



**FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR  
IN SUPPLY CHAINS ACT  
2024 Report**

## **ORLEN UPSTREAM CANADA LTD.**

### ***FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT***

#### **2024 Report**

This report is made by the reporting entity ORLEN Upstream Canada Ltd. ("ORLEN" or the "Company") pursuant to *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") and constitutes ORLEN's forced labour and child labour reporting statement for the financial year ended December 31, 2024 (the "Report").

ORLEN Upstream Canada Ltd. is a privately held company and is headquartered in Calgary, Alberta, Canada.

#### **Steps to Prevent and Reduce Risk of Forced Labour and Child Labour**

During 2024, ORLEN's multi-disciplinary working team dedicated to the Act and this Report continued to review the impact of the Act on the Company and assess the effectiveness of the actions taken to address the risks of modern slavery.

The team continued to educate themselves on standard industry practices and tools that are being utilized in our industry and others in order to comply with the Act. They engaged the services of external experts to advise in relation to modern slavery risks, obligations and reporting requirements.

Reviewed corporate governance documentation and revised corporate policies to better align with the Company's position on human rights.

Issued formal communications (mail out, emails, one on one conversations, etc.) to both employees, consultants and independent contractors (the "Workers") as well as suppliers and contractors with the Company's position on human rights, expectations of those working for ORLEN on behalf of the Company and an offer for clarification and further understanding/training.

#### **Structure and Activities**

ORLEN is a Canadian-based energy company engaged in the acquisition, exploration, development, production, marketing and sale of crude oil, natural gas, and natural gas liquids ("NGLs"). The Company's principal core regions of operations are in western Canada.

As of December 31, 2024, ORLEN had approximately 82 full time equivalent employees, consultants and independent contractors, inclusive of corporate head office and field-based staff.

Additional information relating to the Company, and a copy of this 2024 report can be found on the Company's website at [www.orlenupstream.ca/EN/Pages/default.aspx](http://www.orlenupstream.ca/EN/Pages/default.aspx).

ORLEN holds interests in joint-venture assets that are not operated by the Company.

Statements regarding operations, assets and values apply only to ORLEN operated assets. Data for non-operated assets is not presented in this Report, however, this Report includes a description of how ORLEN generally approaches risks, including with respect to human rights, in relation to its interests in non-operated assets and other investments.

## **Supply Chain**

For the purposes of this Report, "supply chain" refers to all direct procurement activities for goods and/or services required or consumed by ORLEN in its operations. ORLEN's supply chain includes manufacturers and distributors of oil and natural gas goods and supplies; third party contractors providing equipment, services, and personnel as part of the exploration and production process; third party contractors providing transportation to and from ORLEN's production facilities; and corporate procurement.

## **Policies**

ORLEN's Code of Business Conduct and Ethics (the "Code") reinforces the Company's requirements and expectations for conducting business and expected behaviours and includes a statement on ORLEN's commitment to human rights.

The Code has been adopted and approved by the Company's Board of Directors and outlines the expectation that all employees, directors, officers, and contingent workforce contractors shall obey all applicable laws and adhere to ORLEN's strict ethical standards.

The Company recognizes, respects, and abides by all labour, child labour and employment laws and expects its contract service companies, contractors and other third-party companies to meet the same standards. These include prohibitions on child labor, forced labor and discriminatory behavior, as well as recognition of human rights and social justice.

ORLEN's corporate templates used for the procurement of goods and/or services on behalf of the Company contain (i) an obligation for independent contractors, suppliers and contractors and their own subcontractors to abide by all applicable laws and the Company's Code; (ii) a representation and warranty in relation to such obligations; and (iii) default provisions if these obligations are breached.

ORLEN reports (and encourages the reporting of) actual or potential non-compliances with internal policies and/or legal requirements, including those in relation to forced labour and child labour, so they can be addressed appropriately. ORLEN takes every report seriously and provides immunity from disciplinary action for good faith reporting of incidents and issues. The Company's Whistleblower Policy lays out several avenues to report an issue depending on the nature of the incident, for employees and non-employees.

ORLEN requires our counterparties (suppliers and contractors) to be familiar with and abide by ORLEN's Policies by including such obligations in contracts for the procurement of goods and/or

services. ORLEN also endeavors to conduct business with those that share our principles and values.

[www.orlenupstream.ca/EN/Company/Company-Policies/Pages/default.aspx](http://www.orlenupstream.ca/EN/Company/Company-Policies/Pages/default.aspx)

### **Due Diligence Processes**

1. Reviewed and revised the Code to include a more comprehensive section on human rights.
2. Reviewed and revised our Whistleblower Policies to include a more comprehensive section on human rights.
3. The newly revised Code was signed by all Workers.
4. A notification of the revised Whistleblower Policy was emailed to all Workers.
5. Both revised policies are available on the ORLEN website  
<https://www.orlenupstream.ca/EN/Company/Company-Policies/Pages/default.aspx>.
6. Issued a letter of ORLEN's position and expectations on the Act to all of our current Workers (email), offering more information and education, if required.
7. Issued a letter of ORLEN's position and expectations on the Act to all of our current suppliers and contractors (mail out), stating consequences for infractions and offering of assistance, if required.

Continued to attend webinars, seminars, meetings with industry counterparts, legal counsel, and others in order to remain up to date on current practices and expectations and include in our own practices as applicable.

### **Identifying ORLEN's Risks Exposure**

The majority of suppliers and contractors of goods and/or services are domestic in the upstream energy sector, which presents a significantly lower risk as it pertains to the subject Act. However, the Company has undertaken initiatives to better understand its risk exposure. The Company has continued to compile information, attend seminars, and looked at third-party managed software in order to initiate the process of further mapping out its supply chain, understanding the tiers of suppliers and contractors, and identifying where the biggest (potential) risks are. The outcomes will determine where initial risk management efforts will be focused. The Company has developed a strategic plan for 2025 - 2026 to identify and address associated risks in their supply chain with a focus on onsite contractors and offsite tier 1 suppliers.

### **Remediation Measures**

In 2024, ORLEN has not identified any instances of forced labour or child labour or loss of income to vulnerable families in ORLEN operations or supply chain. As such, ORLEN did not have to take any remediation measures in 2024.

The supply chain management groups (internal and external) manage the negotiation and implementation of the majority of the Company's contracts and take steps to incorporate contract requirements as set out in paragraph 3 of the Policies and Due Diligence section above.

For anyone (employee or otherwise) seeking advice on ethical/unlawful behavior, human rights matters, or for those who have questions in relation to the Code or are aware of any irregularities, ORLEN encourages open dialogue in accordance with the Whistleblower Policy, as set out in paragraph 3 of the Policies and Due Diligence section above.

### **Training**

In 2024, ORLEN continued to issue their annual computer based acknowledgement on the newly revised Code, which is mandatory for all Workers (permanent and part-time). This training is required to be completed by new Workers and repeated annually. All Workers must verify that they are in compliance with the Code. All Workers are notified and expected to remain current with the Code and any amendments that may be made from time to time.

### **Assessing Effectiveness**

Preventing and addressing forced labour and child labour in ORLEN's operations and supply chain activities will be an ongoing process that will involve continued analysis, monitoring and evaluation. ORLEN will continue to endeavor to conduct business with suppliers, contractors and contract service companies who share the same values and business principles.

As part of its continuous improvement in addressing associated risks, ORLEN's multi-disciplinary team will continue to investigate, identify and recommend any further areas of future improvement in the ORLEN's business processes.

### **Approval and Attestation**

This report was approved by ORLEN's Board of Directors to paragraph 11(4)(a) of the Act and will be filed with the Minister of Public Safety.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year ended December 31, 2024.

I have the authority to bind ORLEN Upstream Canada Ltd.

A handwritten signature in blue ink, appearing to read "Bohdan Bartoszewicz", written over a horizontal line.

Name: Bohdan Bartoszewicz  
Title: Chairman of the Board of Directors  
Date: May 30, 2025