



Fighting against forced labour and child labour in supply chains report

REPORT INTRODUCTION

This Modern Slavery Report is provided to meet our obligations and the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), for the reporting period of January 1, 2024 to December 31, 2024. For the purpose of this report, "Woodcote" and the "Company" refers to Woodcote Oil and Gas Inc.

Modern slavery refers to forms of contemporary slavery such as forced or compulsory labour¹, child labour², human trafficking or any other internationally recognized exploitative labour practices. The Canadian government has committed to preventing and reducing these risks and has established this Act to impose certain entities to report on the measures taken in this regard.

STEPS TAKEN TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR

In 2023, Woodcote had started to take steps to better understand its modern slavery risks within its operations and supply chains and throughout the fiscal year, Woodcote reviewed our current suppliers to assess risk levels. As well, we engaged a third party ESG (Environmental, Social, and Governance) reporting team to review our report to ensure compliance with the Act.

In 2024, Woodcote conducted another review of current suppliers to ensure alignment with current policies and ensure all risks are mitigated as to the best of our abilities. Further, reviewed any reporting changes made to the Act to ensure Woodcote was compliant with all requirements.

As a result of the above, Woodcote determined that we are not aware of any high-risk exposure to Modern Slavery at this time.

OUR STRUCTURES, OPERATIONS AND SUPPLY CHAINS

Woodcote is a privately held Alberta based company focused on acquiring conventional oil reserves and applying the latest development technologies to increase production and oil recovery. Woodcote is in Calgary, Alberta with field sites throughout northern Alberta. Woodcote's supply chain in 2024 was comprised of 364 suppliers that supply goods and services necessary for our operations and development of our conventional oil and gas properties. Of the 364 suppliers, approximately 50% are service based and the other 50% are goods. The high percentage of service-based vendors lowers our overall risk profile since

¹ As defined by Article 3 of: International Labour Organization (ILO), Forced Labour Convention, 1930 (No. 29)

² As defined by Article 3 of: International Labour Organization (ILO), Worst Forms of Child Labour Convention, 1999 (No. 182)

service-based suppliers are largely based in Alberta, requiring them to adhere to strict labour regulations and business practices minimizing the risk of forced labour/child labour. All of Woodcote's suppliers in 2024 were in Canada with the majority in Alberta, requiring them to adhere to Canadian oil and gas regulations. Further, Woodcote does not import goods or services from other countries.

POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Woodcote is committed to maintaining the highest standards of ethical conduct in all our dealings with employees, customers, suppliers, and the communities we serve. By means of our policies, we effectively convey our values and expectations, establishing a stringent standard for ourselves, our suppliers, and our employees. Under no circumstances are Woodcote employees allowed to conduct business in an unlawful manner or contrary to regulatory requirements. As such, the Company has several policies and due diligence processes in place to ensure our employees and suppliers understand and support our commitment to ethical business conduct. We are dedicated to continuously developing and enhancing our approach.

Our policies

Woodcote does not currently have specific policies related to the prevention and detection of modern slavery, however, the Company has an established set of policies which foster safe work practices and an ethical and respectful working environment.

- Respectful Workplace Policy – Within this policy, Woodcote is committed to eliminating any unfair or unsafe work practices.
- Fitness for Duty Policy – This policy outlines its expectations that employees are treated fairly and with respect and a person must be fit for their role, therefore they must be both physically and mentally qualified to perform their duties.
- Health, Safety and Environment (HSE) Policy – This policy outlines Woodcote's commitment to a strong health, safety and environmental management system that protects its workers, supervisors, subcontractors, contract operators, suppliers, self-employed persons, visitors and the public (its stakeholders), the natural environment and its property from incidents.

These policies are available to be reviewed by all employees, contractors, suppliers, visitors, and shareholders, ensuring that everyone involved understands and supports the commitment to ethical business conduct. These policies are also reviewed and updated on an annual basis.

In addition to the above policies, the Company abides by the Alberta Human Rights Act and requires all employees to as well.

Due diligence process

Our suppliers are expected to conduct their business in an ethical and responsible manner, and we require them to comply with Woodcote's Respectful Workplace Policy, Fitness for Duty Policy, and Health and Safety Policy. Prior to engaging a prospective supplier, we perform risk-based due diligence procedures to evaluate the supplier. This includes the reference checks to assess whether these suppliers are reputable and uphold similar values and practices to Woodcote. In addition, Woodcote performs further due diligence on prospective suppliers on whether any formal complaints or legal action has been taken against them, including in relation to human rights violations.

If a supplier was to not comply with Woodcote's policies or found to be a risk of non-compliance, we would cease our business with them and take steps to remediate any wrongdoing to those affected.

PARTS OF THE BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR

All our direct suppliers (Tier 1 suppliers) operate in Canada minimizing our risk profile of forced labour and child labour as many of these suppliers would also be subject to requirements of this Act and subject to Canadian laws and regulations.

As such, we take a risk-based approach to assess and manage risks of forced labour and child labour. Our methodology to identify risks is based on a combination of the following:

- **Country risk** – Whether the location of suppliers' headquarters and/or manufacturing sites are in countries with a higher forced labour or child labour score informed by the [WalkFree Global Slavery Index](#)
- **Sector risk**- Whether the goods or services supplied by the supplier is tied to a sector or is comprised of raw materials that originate from known regions where there are higher instances of forced labour or child labour. This assessment was informed by the United Nations Global Marketplace [Sustainability Risk Ratings](#).

Based on the above methodology, we conducted an initial modern slavery scoping exercise of our top ten (10) suppliers which account for approximately 50% of our annual spend. The sectors presenting a higher modern slavery risk potential were identified in suppliers providing certain categories of goods and services including:

- Building and facility construction and maintenance services
- Service industry machinery and equipment and supplies
- Transportation and logistic services
- Industrial manufacturing and processing

Based on the above initial assessment, we understand that our risk exposure to forced or child labour increases when we source certain categories of goods including building materials, drilling equipment, and other manufactured goods. Woodcote is not a direct importer of goods, therefore mitigating the risk of forced/child labour in our operations.

As of the date of this report, Woodcote has not identified any instances of forced labour and child labour and has not been subject to any investigation related to these matters.

MEASURES TAKEN TO REMEDIATE FORCED LABOUR OR CHILD LABOUR

Woodcote has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2023, and therefore, no remediation measures have been taken. The Company acknowledges the importance of continuous monitoring of supply chain activities and will take appropriate remediation measures if the need arises in the future.

MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES

Woodcote has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2024. As such, there is no loss of income to remediate in the current year. We are committed to ongoing evaluation of modern slavery risks in our supply chains and enacting suitable remediation measures.

TRAINING

Woodcote acknowledges the importance of providing training on the requirements of the Act and the Company's policies and processes to manage these risks to its employees. Although Woodcote does not currently have specific modern slavery training in place, the Company will provide its employees with resources related to this topic in the next fiscal year.

ASSESSING EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT USED IN OUR BUSINESS AND SUPPLY CHAINS

An emergency line is listed on Woodcote's website that is directly linked to the Company's operations department and management. Any emergencies or indications of immediate dangers can be reported, and a Woodcote employee will report to the site right away. Less urgent matters are reported to the operations department (VP and Operational Engineer) who will investigate and determine a course of action. Any instances of modern slavery would be reported to management. This would result in an investigation that management and the board would oversee.

Our operations team and members of management perform frequent site visits which help to ensure all suppliers and contractors are abiding by our guideline and policies. Through these site visits, management is also able to assess whether employees are working under safe conditions in line with the Company's various health and safety related policies.

COMMITMENTS BEYOND COMPLIANCE

Woodcote is committed to strengthening our policies and procedures to manage forced labour and child labour risks and therefore intend to the following actions in the next year:

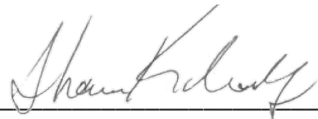
- Review of existing Woodcote policies and suppliers' due diligence and evaluation processes;
- Monitor the requirements of the Act so we, The Company can make changes accordingly;
- Further analysis of potential high-risk suppliers;

CONTACT INFORMATION

For more information, please contact: corporate@woodcoteoil.com

APPROVAL AND ATTESTATION

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 listed above.



Shaun Kolody

President and Ceo

May 27, 2025

I have the authority to bind Woodcote Oil & Gas Inc.