

Pacific Canbriam Energy 2025 Report Fighting Against Forced Labour and Child Labour in Canadian Supply Chains

About this Report

This 2025 Annual Report (this “Report”) encompasses Pacific Canbriam Energy Limited (“PCE”) fiscal year end December 31, 2025. This Report is prepared pursuant to sections 11(1) and 11(3) of *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and has been prepared in compliance with the Act.

PCE is a Canadian energy company focused on the responsible production of natural gas. We are headquartered in Calgary, Alberta, with an office in Fort St. John, and primary field operations in the Altares and Kobes Montney regions of northeastern British Columbia. PCE is a subsidiary of Pacific Energy Corporation Limited. We are proud to be an industry leader in the production of responsibly sourced natural gas and to be certified under the Equitable Origin EO100™ Standard for Responsible Energy Development. PCE is committed to driving excellence, teamwork, respect, integrity and sustainability across all aspects of our operations to build shared value for all of our stakeholders. We are uniquely positioned for responsible production as we own all field infrastructure, including roads, camps, processing plants, gathering pipelines, and water handling assets. PCE’s supply chain includes businesses that supply goods to our organization for various operational requirements.

Pacific Canbriam Energy recognizes the important role that we have in ensuring that our operations, and the supply chains that support our operations, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. PCE is committed to upholding the highest ethical standards and ensuring that our operations, as well as those of our suppliers, reflect our dedication to social responsibility. We unequivocally condemn forced labour and child labour in all its forms and are fully supportive of eradicating these practices from the supply chain. This Report outlines our approach to prevent the risk that forced labour or child labour is used in the production of goods in Canada or elsewhere, or of goods imported into Canada, by PCE or third parties supplying PCE.

Summary

Based on our 2025 supply chain risk assessment and a review of our structure, activities, and supply chains, we consider our operations to be relatively low-level risk for forced labour and child labour. Our operations are conducted exclusively within British Columbia, Canada, with no significant direct sourcing from outside of North America.

While we identify a low-level risk related to purchases of materials manufactured overseas from distributors where we have limited visibility into the distributors supply chain, our process of continuously seeking to better understand our supply chain and sourcing did not uncover any specific instances of forced or child labour.

In 2025, we increased awareness of forced labour and child labour and mitigated risk in our supply chains through the following remediation measures:

- Training our Supply Chain Management group on the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and the risks of forced labour and child labour.
- Ensuring all PCE personnel adhere to our Code of Business Conduct & Social Responsibility policies, found within our Employee Handbook. Additionally, all employees are informed of how to report wrongdoing under our Grievance mechanism and Whistleblower Policy.
- Updating our Supplier Compliance process for all our suppliers to incorporate environmental, social and governance questions including those pertaining to forced labour and child labour.

Additionally, in order to deepen our understanding, in 2025 we committed to engaging in a pilot project in 2026 with an external supply chain risk intelligence platform. Through this engagement, we hope to better assess our global supplier connections and understand critical geographic impacts.

Structures, Activities, and Supply Chain Risk Assessment

Our Supply Chain Management group is responsible for identifying, assessing and responding to all types of risks related to the management and operations of our suppliers and supply chain. This function reports directly to our corporate President. Our Supply Chain Management group's focus is to secure the goods required for oil and gas development, as well as for the operation and sustainment of existing operations from North American-based direct suppliers.

Following a risk-based assessment of our supplier base, our Request for Proposals ("RFPs") process requires all suppliers working on our sites to be in our compliance tool prior to being awarded work. In addition, during formal RFPs, suppliers are required to provide supplemental data with their proposal submission outlining their commitment to HSE, ESG and sustainability.

PCE recognizes the potential for forced or child labour in our supply chain. In 2025, our primary sourcing and procurement activities were based in North America. While we have no significant direct sourcing from overseas, our primary exposure to child or forced labour is beyond our second-tier procurement sources.

We proactively assessed critical suppliers to our operation allowing us to mitigate potential risk to our supply chain. In 2025, we procured goods and services from 533 suppliers. Our top 50 suppliers account for 76% of PCE spend. The overall risk in our supply chain is minimal with operations limited to British Columbia and a supply chain that is based in North America.

Our Supply Chain Management group maintains active engagement with industry peers and supply management professional associations. These relationships have expanded and enhanced our access to shared industry insights and experience, particularly relating to reference checks for equipment supplier assessments and vendor validation.

We did not identify any instances of the use of forced or child labour in our 2025 risk assessment.

Training

PCE internally developed a Modern Slavery training video on the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and the risks of forced labour and child labour. This training covers what human rights are, forced labour and child labour, and our responsibilities with respect to suspecting these activities. While mandatory for members of the Supply Chain Management group, it is available to all employees via our intranet platform.

Additionally, all PCE personnel are required to adhere to our Code of Business Conduct & Social Responsibility policies, found within our Employee Handbook, and ensure that these policies are understood and properly applied to their daily activities. All employees are informed of how to report

wrongdoing under our Grievance mechanism and Whistleblower Policy. We provide employees with ongoing training opportunities to ensure that all employees have current knowledge of PCEs policies.

Policies and Due Diligence Processes

Through our organizational and governance policies we communicate our values and expectations. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working with us. We make every effort to monitor the performance of our suppliers to prevent our activities from having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Code of Business Conduct & Social Responsibility

We are committed to conducting our business in a lawful and ethical manner. Our Code of Business Conduct & Social Responsibility is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing job duties, PCE employees and contractors should always act lawfully, ethically and in the best interests of PCE.

Human Rights Policy

PCE is committed to sustainable development in all locations where we operate, including respecting and protecting human rights. We comply with all applicable local laws and in accordance with internationally recognized human rights conventions and standards. We are committed to preventing and eliminating all forms of forced and child labour.

Code of Procurement Ethics

PCE's Code of Procurement Ethics details the requirements and expectations we have of our suppliers. PCE seeks to promote a mutually beneficial business environment which can bring optimum value to our suppliers. We conduct our business fairly and ethically, and we expect the same from our suppliers. Our mutual commitment and ability to promote these principles determines the quality and longevity of our business relationship.

Procurement Policy

PCE is committed to ensuring its values and policies are reflected in the procurement of all goods and services, promoting excellence, respect and integrity across all aspects of our operations while integrating social and environmental responsibility. Procurement is an essential function requiring collaboration between the Company and Suppliers to deliver consistency and value for the Community, Country and Climate.

Anti-Bribery & Corruption Policy

PCE is committed to conducting its business in compliance with all applicable Anti-Bribery and Corruption (ABC) laws in the jurisdictions in which it operates and strictly prohibits all forms of bribery and corruption both within its organization and in respect of the actions of its employees and suppliers.

Whistleblower Policy

The Whistleblower Policy establishes procedures that allow stakeholders to confidentially and anonymously submit their concerns regarding questionable accounting, internal controls or auditing matters, including fraud or misrepresentation of accounting or financial records, or contraventions of applicable laws, without fear of retaliation. The Whistleblower Policy applies to all employees and those suppliers working for PCE.

Supplier Due Diligence Process

We require the use of approved suppliers, which are companies under contract who meet or exceed our requirements. Our pre-screening requirements include:

- Managing supplier onboarding within an external compliance platform that collects and verifies supplier information, while conducting regular audits to ensure alignment with PCE's established requirements.
- Ensuring contracts are in place that outline supplier responsibilities, including compliance with laws and our Code of Business Conduct & Social Responsibility.
- Risk mapping of our supplier's supply chain for our environmental, social and governance considerations, including those related to forced labour.

Our Request for Proposals process requires all suppliers to be in our compliance tool prior to being awarded work on our site locations. In addition, during formal RFPs suppliers are required to provide supplemental data with their proposal submission outlining their commitment to HSE, ESG and sustainability. An additional measure of success in 2025 is our improved response rate and engagement with suppliers.

The following questions are examples of those found within our external compliance tool pertaining to the use of forced labour and child labour:

- Do you have a Policy that ensures no Forced Labour takes place in your organization and supply chain?
 - 63% responded yes.
- Has your organization performed training for your employees regarding Forced Labour, your organizational policy, and expectations around it?
 - 52% responded yes.
- Do you perform any due diligence to ensure that your supply chain (that provides, imports, or distributes goods) does not conduct any Forced Labour activities?
 - 22% responded yes.

While adding the questions above has helped increase awareness amongst suppliers, we will continue to encourage more suppliers to take action.

Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I, in the capacity of President, Pacific Canbriam Energy, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.

Nauman Rasheed

Nauman Rasheed
President, Pacific Canbriam Energy

May 25, 2026

I have the authority to bind Pacific Canbriam Energy.