



## **HUMAN RIGHTS CORPORATE POLICY**

### **1. INTRODUCTION**

This Policy sets forth the responsibilities of Frontera Energy Corporation and all of its subsidiaries (collectively, "**Frontera**" or the "**Corporation**") subject to the Code of Business Conduct and Ethics and those working for Frontera concerning the protection of human rights.

This Policy is aligned with the corporate purpose, the sustainability strategy, the Code of Business Conduct and Ethics, and other policies of the Corporation, especially those related with social and labor responsibility, safety, health, environment and quality, compliance, and ethics.

Frontera respects and supports internationally recognized human rights and is convinced that its commitment to their protection derives from its ethical foundations rather than from its legal obligation and that applying these principles adds value and competitiveness to the Corporation. Frontera is aware of the obligation of each of the jurisdictions in which it operates to respect, guarantee and protect the human rights of its citizens, and believes in the realization of these rights through joint action between society, business and institutions.

In the event of a contradiction between this Policy and local law, Frontera shall follow the most stringent applicable law or standard.

### **2. OBJECTIVE**

To make known the corporate guidelines that guide business conduct, based on the protection of human rights, understood as those freedoms and standards of treatment that are considered to belong to all people.

### **3. SCOPE**

Considering that respect for human rights is of material importance to Frontera, this document covers all persons, including its partners, associates, suppliers, contractors, subcontractors, and any other business partners and their respective workers, communities, local governments, labor unions and other stakeholders involved in the Corporation's operations and activities.

### **4. COMMITMENT TO HUMAN RIGHTS**

Frontera declares its commitment to promote respect for human rights established in the legal systems of the countries where we operate. Frontera strives to act in compliance with the following frameworks and charters:

- Universal Declaration of Human Rights

- United Nations Guiding Principles on Business and Human Rights
- Voluntary Principles on Security and Human Rights
- International Labor Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work
- Core Conventions of the ILO, including the Forced Labour Convention, Worst Forms of Child Labour Convention, and the Minimum Age Convention
- United Nations Declaration on the Rights of Indigenous Peoples
- Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises
- United Nations Sustainable Development Goals
- United Nations Global Compact
- and the standards on which the Corporation reports its sustainability performance, such as Sustainability Accounting Standards Board (“SASB”) Standards, Global Reporting Initiative (“GRI”) Standards, among others.

Frontera's commitment to respect human rights is transversal for all people involved in the Corporation's operations. Therefore, through internal due diligence processes, the Corporation honors the integral, legal, and ethical duty to respect the human rights of its employees, contractors, contractors' employees, and stakeholders. Further, the Corporation will apply the Code of Business Conduct and Ethics to third parties with which the Corporation has significant dealings, including partners, suppliers, distributors, contractors, subcontractors, agents, advisors, and other representatives acting on the Corporation's behalf.

The Corporation declares zero tolerance for human rights violations by its partners, suppliers, distributors, contractors, subcontractors, agents, advisors, and other representatives acting on the Corporation's behalf, especially any type of child labor, forced labor, or human trafficking. Frontera will not tolerate any retaliation against any person who in good faith reports a suspected violation of this Policy and other human rights laws.

## 5. CORPORATE HUMAN RIGHTS GUIDELINES

The Corporation establishes the following corporate human rights guidelines:

**5.1. Communities:** The Corporation strives to maintain an open and proactive dialogue with the communities, as well as understand the social, economic, cultural, and environmental conditions of the jurisdictions in which we operate. We also seek to understand, prevent and manage the impacts of our operations and promote human rights throughout our areas of influence.

**5.2. Indigenous communities:** The Corporation recognizes and respects the link of indigenous populations to land and water, in line with the United Nations Declaration on the Rights of Indigenous Peoples. The Corporation is committed to free and informed consultation to obtain the prior consent of Indigenous communities for activities that could affect them.

**5.3. Forced labor and human trafficking:** We prohibit our contractors, subcontractors, associates, suppliers and any other business partners from directly or indirectly engaging in or using modern slavery practices, which are contrary to our commitment against forced labor and human trafficking. Forced labor includes labor or service provided or offered to be provided by a person under circumstances that could reasonably be expected to cause the person to believe their safety, or the safety of a person known

to them would be threatened if they failed to provide or offer to provide the labor or service. The use of involuntary labor, including prison labor, debt bondage, indentured servitude or any other form of forced labor is strictly prohibited. Likewise, Frontera does not tolerate any form of involuntary or forced labor and will not do business with any person or entity that engages in or facilitates human trafficking.

The use of physical acts to punish or coerce workers, the use of psychological coercion, or any other form of physical or non-physical abuse is prohibited. Frontera prohibits the practice of charging recruitment fees to job applicants under any circumstance as these fees can lead to debt bondage and restrict the freedom of employees. Furthermore, Frontera forbids the withholding of passports, identification documents, or any personal legal documents. Such actions are inherently coercive and violate basic human rights, as well as the freedom of movement and the right to personal security.

**5.4. Child Labor:** Frontera strictly prohibits the exploitation of children and the use of illegal child labor. Illegal child labour includes the worst forms of child labour as defined in the ILO's *Worst Forms of Child Labour Convention*. Illegal child labour also includes employment of children under the applicable minimum legal age in a way that is mentally, physically, socially or morally dangerous and harmful or that interferes with attendance at school, as set out in the ILO's *Minimum Age Convention*. The Corporation and its associates, suppliers, contractors, subcontractors, and any other third-party providing services to, or on behalf of, Frontera must ensure that all of their employees are legally eligible for employment and meet the applicable minimum legal age.

**5.5. Diversity:** In line with the Diversity, Inclusion, and Equity Policy, the Corporation ensures that both men and women have access to decent and productive work under conditions of equality and safety, regardless of sex, physical ability, ethnic identity, age, religious beliefs, political or philosophical ideology, educational level, nationality, family origin, language, sexual orientation, gender identity, socioeconomic status, or any other sociocultural characteristic, as well as ways of thinking and expressing oneself.

**5.6 Security:** In line with the Voluntary Principles on Security and Human Rights, the Corporation manages and maintains its relations with law enforcement and private security providers, promoting respect for human rights.

**5.7. Right of Association:** The Corporation is committed to compliance with the labor rights of its employees and to ensuring for its contractors and subcontractors that these same practices are in place. In addition, the Corporation is committed to sponsoring and guaranteeing the right to freedom of association and collective bargaining in its value chain.

## **6. SYSTEM FOR PREVENTION AND MANAGEMENT OF HUMAN RIGHTS RISKS AND IMPACTS**

With the commitment to respect and promote human rights in all of the Corporation's activities, Frontera has created an internal system for the prevention and management of human rights risks and impacts, called the Human Rights Risk and Impact Management Manual, the implementation of which is the responsibility of certain management levels as well as the Corporation's operational and administrative areas.

Frontera commits to ensuring compliance with these policies, and any violation will be met with appropriate disciplinary actions, including potential legal recourse. Our commitment to these standards is unwavering, and we expect all associates, suppliers, contractors, subcontractors, and any other third-party providing services to, or on behalf of, Frontera, and all other stakeholders to adhere to these ethical practices, promoting a work environment free from exploitation and coercion, and any failure to adhere to such standards will be met with appropriate action, including but not limited to Frontera ceasing to conduct business with such persons.

## **7. CONTACT AND REPORTS**

In case of any questions, concerns, or requests regarding the application of this Policy:

- Employees may contact your supervisor, through the Sustainability Manager.
- Local governments and community may contact Frontera's Corporate Social Responsibility professionals in the applicable jurisdictions.
- Contractors and suppliers may contract [atencionproveedores@fronteraenergy.ca](mailto:atencionproveedores@fronteraenergy.ca);

If confidentiality or anonymity is required, reports of potential violations of human rights laws or this Policy may be made to the to the Ethics Hotline. More information is available in Frontera's Ethics Complaints Protocol.

### **Ethics Hotline (toll free):**

- Canada: 1- 855-815-2385
- Colombia: 01-800-911-0010 or 01-800-911-0011. After the prompt, dial 855-815-2385.

## **8. OVERSIGHT & VALIDITY**

This Policy is subject to approval by Frontera's Board of Directors, which shall be responsible for its maintenance and periodic review. The most recent revision of this Policy was approved on December 5, 2023.