



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

### FRONTERA ENERGY CORPORATION REPORT - REPORTING YEAR 2025

#### 1. Introduction

Frontera Energy Corporation (hereinafter “**Frontera**” or the “**Company**”), is a company listed on the Toronto Stock Exchange (“**TSX**”) under the ticker symbol “**FEC**” and incorporated under the laws of the Province of British Columbia, Canada.

The Company presents this report, which indirectly includes its subsidiaries, highlighting the actions implemented throughout the organization to respect human rights and to prevent any forms of child labour and all forms of modern slavery in its supply chain. This report discusses the implementation of policies, procedures and regulations applicable to Frontera (in its operations in Colombia), its contractors throughout its supply chain, and other parts of the business and supply chains, pursuant to the requirements of Section 11.3 of the ***Fighting Against Forced Labour and Child Labour in Supply Chains Act*** (hereinafter the “**Act**”).

#### 2. General Overview of Frontera Energy Corporation

Frontera recognizes the role it plays within the social environment and strives to maintain close, transparent and ethical relationships with its stakeholders. The Company acknowledges that respect for human rights is a material factor in business performance, and, accordingly, establishes a corporate commitment applicable to all its operations, including partners, affiliates and the supply chain.

The commitment to respect human rights is grounded in the following instruments: the Universal Declaration of Human Rights; the United Nations Guiding Principles on Business and Human Rights; the Voluntary Principles on Security and Human Rights; the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work; the ILO core conventions, *including the Forced Labour Convention, the Worst Forms of Child Labour Convention, and the Minimum Age Convention*; the United Nations Declaration on the Rights of Indigenous Peoples; the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; the United Nations Sustainable Development Goals; the United Nations Global Compact; and the standards under which the Company reports its sustainability performance, including the Sustainability Accounting Standards Board (SASB) Standards and the Global Reporting Initiative (GRI) Standards, among others.

During 2025, Frontera continued its human rights due diligence process to identify, prevent and mitigate impacts and risks related to human rights violations, particularly those associated with forced labour and child labour across its value chain. Furthermore, actions were taken to safeguard occupational health and safety and working conditions for the Company’s employees and for individuals retained through third parties, partners, affiliates, and across the supply chain.



### 3. Structure of the Company's Operations

Frontera Energy Corporation is a Canadian public company, engaged in the exploration, development, production, transportation, storage and commercialization of crude oil and natural gas in South America, including related investments in both upstream and midstream facilities.

On March 10, 2026, Frontera, Parex Resources Inc. ("**Parex**") and Parex Acquisitionco Inc., a wholly-owned subsidiary of Parex ("**Purchaser**" and, together with Parex, the "**Purchaser Parties**"), entered into an arrangement agreement pursuant to which Parex has agreed to acquire, through Purchaser's acquisition of all of the outstanding shares of common stock of Frontera Petroleum International Holdings B.V., all of Frontera's Colombian oil and gas upstream business, which consists of all of Frontera's oil and gas exploration and production assets in Colombia, its reverse osmosis water treatment facility and its palm oil plantation, pursuant to a court-approved plan of arrangement under the *Business Corporations Act* (British Columbia) (the "**Parex Transaction**").

The agreement has an effective date of January 1, 2026, and is anticipated to close in the second quarter of 2026. For additional information, see the material change report of Frontera dated March 13, 2026, a copy of which is available on Frontera's SEDAR+ profile at [www.sedarplus.ca](http://www.sedarplus.ca).

Additionally, all of Frontera's crude oil assets and interests in Ecuador were sold effective December 9, 2025. As a result of the above matters, if the Parex Transaction is completed as anticipated, Frontera's ongoing business will consist of its Colombian infrastructure business, which consists of strategic investments in infrastructure assets such as the Oleoducto de los Llanos S.A. ("**ODL**") pipeline and the Sociedad Portuaria Puerto Bahia S.A ("**Puerto Bahia**") port facility.

#### 3.1. Description of Operations

As of December 31, 2025, the Company held a diversified asset portfolio consisting of 18 exploration and production blocks in Colombia and Guyana, together with pipeline infrastructure and port facilities in Colombia.

##### Operations in Colombia:

- 36,499<sup>1</sup> bbl/d in average production
- 5 blocks in exploration phase
- 12 blocks in production phase
- 1 block in exploration and production phase

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<sup>1</sup> Including 23,259 bbl/d of heavy crude oil, 13,886 bbl/d of light and medium crude oil, 6,042 mcf/d of conventional natural gas, and 1,644 boe/d of natural gas liquids.



- 1 block in production phase with a partner
- 1 block in exploration phase with a partner

### **3.2. Structure of Frontera Operations**

#### **Upstream: Exploration**

- 4 onshore blocks in exploration phase
- 1 onshore block in exploration and production phase
- 1 offshore block in exploration/appraisal phase

Net proved reserves (P1): 94.4 MMboe

Gross reserves P1 + probable (P2): 133.8 MMboe

#### **Output: Onshore**

- 12 crude oil blocks in production phase
- 39.011 bbl/d of crude oil production
- 2 gas blocks in production phase
- 3,733 mcf/d of conventional natural gas and 1,850 boe/d of natural gas liquids

#### **Port:**

99.97% ownership interest in Puerto Bahia

### **3.3. Supplementary Information - Description of Frontera's Supply Chain**

Frontera's supply chain is comprised of various companies that provide services directly to its operations. These companies are grouped into the following categories:

- Well intervention service providers: including services related to drilling, workover operations, and well completions.
- Surface service providers: including services related to civil works construction, storage tanks, flowlines and other surface infrastructure.
- Providers of goods and/or associated services: including environmental services, emergency response systems, security services, and other operational support services.

## **4. Measures Adopted to Prevent Forced Labour and Child Labour**

Frontera ensures that its operations are carried out in alignment with its commitment to human rights by integrating its Code of Business Conduct & Ethics and Corporate Human Rights Policy as core elements of its sustainability management framework; with application across its entire value chain, including employees, partners, subsidiaries, and its supply chain.

We are steadfastly dedicated to advancing human rights within our operations and supply chain. Through a range of initiatives, we enhance our operational practices and proactively



address the risk of human rights violations. We acknowledge the vulnerability of specific activities in certain geographic regions, particularly transportation. Frontera also acknowledges that there is potential vulnerability in our supply chain for carrying risk of forced labour or child labour. In particular, Frontera engages multiple suppliers and despite best efforts, does not have 100% transparency into our suppliers' operations or their upstream suppliers' operations. This lack of transparency introduces a risk of forced labor or child labour occurring at the lower levels of the of the Company's supply chain. The due diligence approach seeks the early identification of actual and potential risks and impacts on the human rights of stakeholders, enabling the implementation of preventive and mitigation measures, as well as remediation plans in case of potential human rights violations.

The Company continues to implement initiatives aimed at strengthening its culture of integrity, grounded in performance aligned with respect for human rights. This includes, among other measures: **i)** the ongoing review of actual and potential risks and impacts on fundamental human rights across all of Frontera's core processes, including risks and impacts related to forced labour and child labour within its operations; **ii)** the management of human talent through the implementation of best labour practices, ensuring compliance with legal requirements, and the provision of dignified, safe, and healthy working conditions—both physical and psychological—for direct employees as well as individuals engaged throughout the supply chain. This includes, but is not limited to: the elimination of all forms of forced labour and human trafficking; the effective abolition of child labour; the promotion of non-discrimination and inclusion across all areas of work; freedom of association and the effective recognition of the right to collective bargaining; **iii)** a community engagement strategy grounded in respect, dialogue, and compliance with commitments and obligations, as well as the development of open, ongoing, and transparent information-sharing processes; **iv)** compliance with ILO Convention regarding ILO Convention No. 169 concerning Indigenous and Tribal Peoples, particularly with respect to the right to free, prior, and informed consultation; and **v)** the establishment of differentiated communication and grievance channels for reporting potential human rights violations.

In accordance with the foregoing, during 2025 Frontera carried out the following activities:

## 5. Implementation of policies related to forced labour and/or child labour

- (i) Corporate Human Rights Policy:** Frontera reaffirms its commitment to respect for human rights by publishing this policy on its website. This policy establishes Frontera's commitment to respect and promote respect for human rights, across the entire Company and its value chain, emphasizing zero tolerance for human rights violations or infringements. This commitment extends to the prohibition of forced labour and child labour.
- (ii) Code of Business Conduct and Ethics** establishes the standards for ethical and responsible conduct in corporate relationships. In 2025, 100% of Frontera employees



completed the annual Code of Business Conduct and Ethics training and formally certified their commitment to comply with this code and its related policies.

- (iii) **Code of Business Conduct and Ethics Handbook: ‘Ethics is the way’, Chapter 5, Communities and Human Rights:** grounded in the principles of ethics and corporate compliance, this chapter affirms that Frontera respects and promotes respect for the human rights of workers and communities in its areas of operation.
- (iv) **Contractual Labour Annex:** states that companies within Frontera’s supply chain must respect, promote and comply with the applicable legal framework and Frontera’s policies regarding personnel engagement, including lawful terms and conditions of employment, timely payment of wages and overtime, prompt social security contributions, legally compliant working hours and shift arrangements, and adequate occupational health and safety standards. It also establishes the obligation to respect and promote human rights across all operations and reaffirms Frontera’s commitment to eradicate forced labour or child labour within its operations, with the objective of eliminating contemporary forms of slavery and human trafficking. It further requires the implementation of measures aimed at promoting diversity and addressing complaints or concerns raised by employees through the Joint Occupational Health and Safety Committee and workplace coexistence mechanisms.
- (v) **Occupational Health and Safety Policy:** sets out the corporate framework for identifying occupational health, mental health, and process safety risks, as well as measures for their prevention and mitigation, including emergency preparedness and response actions aimed at protecting life and safety.

## 6. Due Diligence Actions Related to Forced Labour and/or Child Labour.

- (i) **Human Rights Risk Identification:** in 2025, Frontera assessed the risks associated with 132 corporate macro-processes, placing people at the centre of the analysis and identifying potential and actual impacts on the human rights of individuals connected to its operations in Colombia.
- (ii) **Occupational Health and Workplace Medicine Management:** during 2025, Frontera strengthened its commitment to protecting and promoting the right to health in the workplace through the implementation of comprehensive care strategies. The Company implemented a digital system that enables real-time monitoring and employee’s health conditions analysis, facilitating data-driven decision-making. In addition, the Company provides on-site medical services at its operating fields for emergency care, priority consultations, and preventive programs, supported by epidemiological surveillance within the areas of operational influence. These actions ensure a timely and effective response, contributing to the safety and well-being of workers.



- (iii) **Sustainable Supply Chain:** following the inclusion of Sustainable Supply Chain as a priority topic within the 2024-2028 Sustainability Strategy, Frontera has been strengthening alignment with international standards across its supply chain on sustainability-related matters, including health and safety performance, community engagement, respect for human rights, and compliance with applicable labour and environmental laws and regulations. In addition, during an initial phase, Frontera implemented human rights due diligence actions with supply chain companies that maintain long-term commercial relationships with the Company or employ a significant number of workers from communities in the Company's area of influence. This phase included a 12-hour training on Business and Human Rights. To support companies in strengthening their human rights practices, Frontera created **RedPRO**, a supply chain business network designed to advance respect for human rights. Participation requires, at a minimum, that companies adopt and effectively implement a Corporate Human Rights Policy. A higher level of maturity is expected as participating companies advance in the implementation of their due diligence processes.

In recognition of the initiatives undertaken in supply chain management, in 2025 Frontera obtained CIPS certification<sup>2</sup>, acknowledging compliance with global standards in procurement and supply chain management.

- (iv) **Management of Labour Conditions in the Supply Chain:** With the objective of promoting and implementing sound labour practices and ensuring respect for workers' rights, social well-being, and operational sustainability, Frontera has established a Labour Standard for Contractors. This standard includes the implementation of the following components: a) Legal Compliance: ensuring adherence to applicable labour legislation and the standards established by Frontera; b) Compliance Verification: ensuring proper fulfilment of labour obligations through supervision and pre-supervision processes; c) Safe and Healthy Work Environments: promoting work spaces free from any form of labour or sexual harassment; and d) Trade Union Relations: fostering constructive and sustainable labour relations aligned with corporate objectives.
- (v) **Speak-up Campaigns:** The Company widely communicates the contact information for its Ethics Hotline to report any conduct contrary to the law, the Code of Business Conduct and Ethics, and related policies and guidelines, including the Corporate Human Rights Policy. It also maintains a web-accessible channel for the reception and

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<sup>2</sup> The CIPS certification is an international professional accreditation awarded by the Chartered Institute of Procurement & Supply.



management of complaints and claims, including cases involving alleged human rights violations.

- (vi) **Compliance Due Diligence Processes:** This process includes the assessment of third-party reputational risk in order to prevent risks associated with, among others, money laundering, terrorist financing, funding for the proliferation of weapons of mass destruction, corruption, bribery, and predicate or related offences, which may include those involving human rights violations to which the Company may be exposed; accordingly, efforts are focused on identifying such risks by considering reports from external sources, including local, regional, and global stakeholders, media reports, and applicable sanctions and restricted party lists, in order to ensure their appropriate management and mitigation, as applicable.

In 2026, Frontera was recognized for the sixth consecutive year as one of the World's Most Ethical Companies by the Ethisphere Institute, which rigorously evaluates organizations across areas including ethics and compliance, governance, environment and social impact, ethical culture, and third-party management, recognizing companies that exemplify ethical business practices, including robust human rights protection systems.

#### **7. Due Diligence Actions Related to Forced Labour and/or Child Labour in the Value Chain**

Additionally, Frontera's subsidiaries—Agro Cascada S.A.S., Promotora Agrícola de los Llanos S.A., Puerto Bahia, and CGX Energy Inc.—undertake efforts to prevent potential violations related to forced labour or child labour. As a result, no issues related to this matter have been identified, and they continue to adhere to the guidelines set out in the communicated policy.

The mentioned subsidiaries maintain their own policies, procedures, and applicable standards governing both their workforce and their supply chain, with the objective of identifying, assessing, and managing risks related to forced labour and child labour in their operations and across their supply chains.

#### **8. Measures Adopted to Remediate Any Form of Forced Labour or Child Labour**

In 2025, Frontera further advanced the visibility and effectiveness of its stakeholder communication mechanisms, engaging employees, communities, supply chain workers, and national and local government authorities. These mechanisms include the Joint Occupational Health and Safety Committee, the Workplace Coexistence Committee, the Ethics Hotline, the petitions, complaints and claims management system, and the UTIPEC Workers' Union. No instances of violations of fundamental human rights, including those related to forced labour and/or child labour, were identified through these mechanisms.

However, should any fundamental human rights violation arise, including any form of forced labour or child labour, the Company applies the United Nations Guiding Principles on Business and Human Rights' mechanisms, understanding that "remediation" and "remedy"



involve both the processes to address adverse impacts and the substantive actions required to mitigate or compensate for such impacts.

The Company will take appropriate disciplinary or contractual action against any employee or contractor involved in any substantiated human rights violation, including forced labour and/or child labour.

#### **9. Actions Taken to Mitigate Adverse Income Impacts on Vulnerable Families Arising from the Elimination of Forced Labour or Child Labour within the Company's Activities and Supply Chain.**

Based on its risk and impact management framework and the proactive implementation of preventive and monitoring measures through human rights due diligence, Frontera did not identify any adverse human rights impacts in 2025 attributable to its operations, including those related to forced labour or child labour. Consequently, the Company has not identified any adverse income impact on vulnerable families.

#### **10. Training on Forced Labour and Child Labour.**

Frontera promotes a culture of integrity across its stakeholders, including communities, local authorities, employees, and supply chain partners, through various initiatives designed to foster awareness of human rights and responsible business conduct, including the following measures:

- (i) Human Rights Training for Government Entities:** this training was delivered in partnership with the Colombian Office of the Ombudsperson (*Defensoría del Pueblo*) with the objective of providing tools and strengthening technical capacities for the handling of petitions, complaints and grievances (PQRs) related to human rights in a business context. The program addressed, among other topics, the importance of safeguarding the rights of children and adolescents within the areas of operation, as well as the timely response to labour-related claims associated with forced labour. In 2025, 15 public employees participated in this training.
  
- (ii) Integrity Month:** In August 2025, a series of voluntary engagement activities were conducted to promote the transfer and internalization of knowledge related to ethical conduct among Frontera employees. During this period, (i) an awareness-raising initiative was conducted on the importance of respecting human rights across all operations, with particular emphasis on the prevention of forced labour; (ii) an expert dialogue session was convened to explore how embedding responsible business conduct in the supply chain generates value and strengthens Frontera's corporate reputation; (iii) innovative engagement activities were conducted, including the "Ethics Escape Room", the "Ethics Store", the Annual Compliance Experience: "The Ethical Leader Life Cycle", and the Ethics and Compliance Intranet portal.



## 11. Mechanisms to Assess the Effectiveness of Human Rights Due Diligence in Preventing Forced Labour and Child Labour in the Company's Operations and Supply Chain.

Frontera has adopted measures to assess the effectiveness of actions taken to prevent forced labour and/or child labour, including the following:

- (i) **Labour Audit Plan:** with the objective of ensuring compliance with applicable labour legislation across the supply chain, this audit framework enables the identification of potential gaps or practices that may pose risks of non-compliance, including the calculation and payment of statutory benefits and wages, the verification of compliance with working hours and shift requirements, and the proper implementation of Workplace Coexistence Committees and Joint Occupational Health and Safety Committees (JOHSC), among others.
- (ii) **Supply Chain Training:** Frontera is a member of the “*Guías Colombia*” initiative, a multi-stakeholder platform that brings together the business sector, government and civil society to foster dialogue and develop guidance on corporate practices aligned with international standards. In 2025, this initiative facilitated human rights due diligence training for 12 companies within Frontera's supply chain.
- (iii) **Annual Employee Training on Respect for Human Rights:** with the objective of strengthening employees' knowledge and integrity-related competencies, Frontera delivers annual training designed to promote the identification of potential human rights risks and impacts across all of the Company's processes, including those related to forced labour. In August, an expert panel was held for Frontera employees with the aim of fostering dialogue on responsible business conduct. The discussion focused on companies' responsibility to implement human rights due diligence processes, the importance of protecting people within operations through the roles performed across the organization, and the need to prevent risks related to child labour and forced labour within supply chains. A total of 175 Frontera employees participated in this training session.
- (iv) **Number of Reported Cases of Human Rights Violations, Including Forced Labour and/or Child Labour.** During 2025, a total of 355 complaints, claims and requests, were resolved through Frontera's grievance mechanism. However, none of these cases were related to specific allegations of human rights violations or labour practices associated with child or forced labour across the different operations of Frontera.
- (v) **Ongoing Monitoring of PQRs Received from Different Stakeholders to Detect Issues Related to Labour Matters:** Frontera has a dedicated labour relations team that



continuously monitors labour performance across the supply chain, as well as the timely handling of complaints, claims and requests received through the UTIPEC (Union of Workers of the Oil and Energy Industry of Colombia). In addition, the Sustainable Labour Practices strategy enables the early identification and management of potential risks of human rights infringements in contracting processes, through training activities, audits and ongoing monitoring of labour performance, with particular emphasis on compliance with Colombian labour legislation.

## 12. Approval

This report has been reviewed and approved by the Board of Directors of Frontera, the principal governing body of the entity that controls each entity included in this report, in accordance with section 11 (4)(b)(ii) of the Act.

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 contained in the report is true, accurate, and complete in all material respects for purposes of the Act, for the reporting year listed above, and that I have the authority to bind **FRONTERA ENERGY CORPORATION.**

A handwritten signature in black ink, appearing to read 'OS', written over a horizontal line.

**Orlando Cabrales Segovia**

**Chief Executive Officer & Director**

**Date: May 19, 2026**

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