



2024 Criterion Energy Ltd. Modern Slavery Report

Criterion Energy Ltd. ("we", "our" or the "**Corporation**") has created this report to meet our requirements pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Modern Slavery Act**").

Forced labour and child labour (each as defined in the Modern Slavery Act and hereinafter together referred to as "**modern slavery**") are violations of fundamental human rights and are occurring across the globe. As a Canadian energy company, we recognize the responsibility we have to ensure our operations and the supply chains that support our operations adhere to the highest ethical standards, which includes no use of modern slavery in our business or supply chains.

The Corporation is subject to the reporting requirements of the Modern Slavery Act. This report covers the Corporation's activities, and the activities of our subsidiaries listed in Appendix A during our previous financial year, from January 1, 2024 to December 31, 2024.

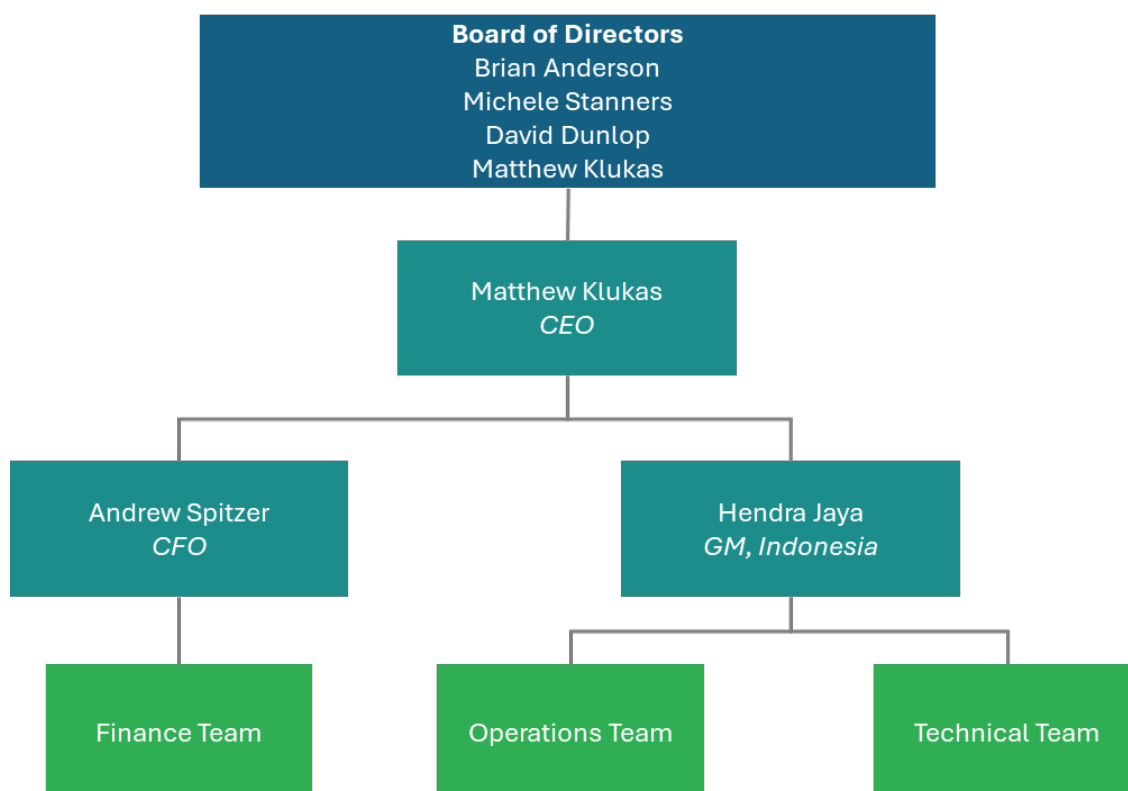
The Corporation takes modern slavery and our reporting requirements very seriously and we are committed to ensuring that we adhere to such requirements. We will continue to evaluate and assess our processes with respect to modern slavery in our business over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

Steps Taken During 2024

The Corporation first became aware of the Modern Slavery Act after it came into force and subsequently engaged our legal counsel to assist in implementing the requirements of the new reporting regime. In early 2024, the Corporation acquired our first operated interest, an Indonesian entity with well-established supply chain processes. As such, we did not take any steps in 2024 in relation to specifically reducing the risks of modern slavery occurring in the Corporation's supply chain; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain. We intend to continue to evaluate our reporting processes to ensure that our reporting with respect to modern slavery meets the statutory requirements.

Structure, Activities and Supply Chains

- **Organization Structure (at December 31, 2024):**



- **Operations:** In the year 2024, the Corporation acquired Mont D’Or Petroleum Limited (“MOPL”), a British Virgin Islands registered corporation with assets in Indonesia, and its subsidiaries. The MOPL assets had previously been managed by a private firm based in Singapore with an established record and well-respected reputation for zero tolerance with regards to slavery, corruption and any other nefarious conduct across Southeast Asia. All other operations conducted by the Corporation took place within the head office in Calgary, Alberta. Within non-operated assets, Canadian operations were limited to royalty interest with no purview to how activities were conducted by the operator. Operations were carried out by two large reputable and reportable Canadian entities (Tourmaline Oil Corp and Canadian Natural Resources Limited). Non-operated Indonesian operations were limited to the Bulu PSC which is an offshore undeveloped field. Operations were limited to studies and engineering work, and as such required skilled employees from reputable entities.
- **Supply chains:** Prior to the acquisition of MOPL, the Corporation’s supply chain was not established as there was limited, if any need, for established procedures. Upon closing of the MOPL acquisition, Criterium worked with the supply chain team based in Jakarta to ensure that appropriate steps were being taken when procuring goods and services in our Indonesian operations. This includes but is not limited to a rigorous tender process on any purchases.

Additional information regarding the corporate structure and operations of the Corporation can be found in our 2024 Annual Information Form/Annual Audited Financial Statements and related management's

discussion and analysis for the year ended December 31, 2024, which are posted on our website (www.criteriumenergy.com) and filed on SEDAR+ (www.sedarplus.com).

Policies and Due Diligence

Policies

The Corporation does not have any specific policies in place in relation to mitigating risks related to modern slavery. The Corporation may in the future consider implementing policies designed to mitigate the risks of any actual or perceived modern slavery occurring in relation to our business or operations.

The Corporation's Code of Business Conduct and Ethics (the "**Code**") requires all of our employees, contractors, consultants, agents, business partners, and other service providers to have high standards of professional and ethical conduct. In addition, the Code requires compliance with all applicable laws, rules and regulations including the Modern Slavery Act and any other legislation relating to modern slavery. The Corporation may in the future consider implementing additional policies designed to mitigate the risks of any actual or perceived modern slavery occurring in relation to our business or operations.

Below, we have provided an overview of the relevant policies that we currently have in place:

Code of Business Conduct and Ethics / Anti-Corruption and Anti-Bribery Policy:

As outlined in the Code, Criterium Energy is committed to fostering an environment where all human rights laws and regulations are embedded in all our frameworks, manuals, policies and procedures. This commitment extends to all suppliers and other business partners performing work for the Company. Criterium Energy acknowledges our duty to respect human rights and to remediate human rights impacts.

Employee responsibilities:

- Employees must ensure work complies with Criterium Energy's commitments to human rights; and
- If an employee suspects, witnesses, or experiences any potential human rights violations at any of our work environments, they should speak up and report it.

Criterium Energy complies with applicable laws and regulations in all jurisdictions in which we operate, including the United Nations Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Whistleblower Policy:

As per the Code, any type of retaliation is considered a violation of the Code and will not be tolerated. Allegations will be investigated in accordance with our integrity procedures.

What is retaliation:

Retaliation may present itself in different ways, it includes but is not limited to the following examples:

- Withholding information;
- Prying questions;

- Veiled threats;
- Excluding individuals from relevant meetings;
- Not providing development opportunities; and
- Intimidating words or behaviors.

No adverse or disciplinary action will be taken against individuals for reporting a concern or suspected violation of the Code.

Criterium Energy does not permit retaliation of any kind against:

- Individuals reporting concerns or suspected violations of the company's Code, other corporate policies and standards, or laws and regulations in the applicable jurisdictions; or
- Individuals participating in reviews or investigations by a governmental authority or by the company, where the person has a good faith belief that a violation of the company's Code, other corporate policies and standards, or other illegal or unethical conduct has or will occur.

In addition to the above, we intend to regularly evaluate our approach with respect to modern slavery to ensure the effectiveness of our methodology, including amending existing policies and implementing new policies, as necessary, to mitigate the risks of modern slavery from occurring in our business or operations to the extent determined necessary.

Due Diligence

Given the existing established supply chains in place, the Corporation has not historically undertaken any steps to conduct due diligence relating to mitigating the risks of modern slavery occurring in relation to our business or operations; however, we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain. We may in the future consider implementing additional procedures to ensure we are not unknowingly engaged in business with any entities involved in modern slavery.

Activity and Supply Chain Risks

The Corporation is not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains.

Remediation Measures

We are not aware of the existence of modern slavery in our business and the supply chains that support our operations and as such, we have not taken any specific measures to remediate any forced labour or child labour or to remediate the loss of income to the most vulnerable families that resulted from any measure taken from any of the Corporation's actions.

Employee Training

The Corporation has ensured that all employees are aware of the new reporting requirements under the Modern Slavery Act.

Assessment of Effectiveness

The Corporation has not yet implemented any policies or processes to assess our effectiveness in ensuring that modern slavery is not used in the Corporation's business or supply chains.

Approval and Attestation of the Report

This report was approved by the Corporation's Board of Directors in respect of the Corporation and its subsidiaries listed in Appendix A on April 28, 2025 pursuant to paragraph 11(4)(b)(ii) of the Modern Slavery Act and has been filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of the Corporation, and with no personal liability, that the information in this report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.

Matthew Klukas
President & Chief Executive Officer
May 1, 2025

I have the authority to bind the Corporation.

Appendix A

Corporate structure of Criterium Energy Ltd.

(as at December 31, 2024)

