

TODD ENERGY CANADA LTD.
REPORT UNDER THE *FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR*
IN SUPPLY CHAINS ACT (CANADA)
FOR THE FINANCIAL YEAR ENDED DECEMBER 31, 2023

1. Introduction and Application

This report (the “**Report**”) is prepared by Todd Energy Canada Ltd. (“**Todd**”, “**we**” or “**our**”) in compliance with the requirements of the Canadian *Fighting Against Forced Labour in Supply Chains Act* (the “**Act**”) with respect to the period from January 1, 2023 to December 31, 2023.

2. Steps Taken to Prevent and Reduce the Risks that Forced Labor or Child Labor is Used

Todd has a standard Code of Conduct in its Master Services Contract that vendors sign when they are contracted to do work with Todd. Todd will follow up with the vendor to ensure that materials have not originated from high risk areas.

Todd’s parent company, Todd Corporation, has a supplier code of conduct under which Todd has the expectation that its suppliers must provide a workplace that is free from discrimination, unfair practices and modern slavery, which refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. Todd has asked question to certain vendors regarding their supply chains, particularly suppliers for pipeline products and steel.

3. Structure, Activities and Supply Chains

Todd is an Alberta corporation headquartered in Calgary, Alberta. Todd is a wholly-owned subsidiary of Todd Corporation, New Zealand private company.

Todd is an upstream oil and gas producer. Its core activity is the development of oil and gas resources in North East British Columbia. This requires Todd to engage vendors to conduct work to execute its activities. Todd’s procurement procedures are very prescriptive; all vendors are vetted through 3rd party entities (i.e – ComplyWorks) to ensure they are safe and qualified. Depending on the value of the activity, Todd will undertake a formal bidding RFP process. Todd then negotiates with the winning bidder who is then contracted under Todd’s contracts.

4. Policies, Governance and Due Diligence processes

As set forth above, Todd’s parent company has a supplier code of conduct and Todd has a Code of Conduct in its Master Services Contract. As set forth above, Todd uses 3rd party entities to vet vendors.

5. Parts of Todd’s Business and Supply Chains that Carry a Risk of Forced Labor and Child Labor and Steps Taken to Assess and Manage the Risk that Forced Labor or Child Labor is Being Used in Todd’s Operations and Supply Chain

Supply of pipeline products and steel may carry a risk of forced labor. As set forth above, Todd’s procurement procedures are very prescriptive; all vendors are vetted through 3rd party entities (i.e – ComplyWorks) to ensure they are safe and qualified.

6. Remediation Measures

We have not identified any forced labor or child labor in our activities and supply chains and have not taken any measures to remediate or eliminate any forced labor or child labor in our activities and supply chains.

7. Training

Certain of Todd’s officers and personnel involved in procurement attended seminars on the Act that were hosted by external legal firms.

8. Assessing Effectiveness


We do not currently have separate policies or procedures in place to assess our effectiveness in ensuring that forced labor and child labor are not being used in our activities and supply chains; other than our procedure for vetting vendors set forth above.

9. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the board of directors of Todd Energy Canada Ltd. for the financial year ended December 31, 2023.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, hereby attest that I have reviewed the information contained in this Report for the entity listed above. Based on my knowledge, and having exercised reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I am providing this attestation in my capacity as an authorized signatory of Todd Energy Canada Ltd., and not in my personal capacity.

Dated as of May 31, 2024.

By: 

Name: Michael Jones
Title: COO