

PetroTal Corp.
Supply Chains Act Report

ABOUT THIS DOCUMENT:

This is the first draft of **PetroTal Corp.** (“PetroTal” or the “Company” or “we” or “our”) and its subsidiaries’ report pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* Report. It builds on the content **PetroTal Corp.** inputted into the Public Safety Canada Questionnaire Excel, information from internal documents, publicly available documentation, and information provided by Oliver Alvaro, Raul Farfán, Freddy Jaimes and Sonia Lou through shared documents sent via email or added to the shared Teams platform.

Throughout this document, placeholders are used where there is an opportunity for **PetroTal Corp.** and its subsidiaries to provide more detail to satisfy the reporting requirements. Comments are also left throughout the document to note areas requiring additional clarification or confirmation from **PetroTal Corp.** and its subsidiaries.

PETROTAL ROLES AND RESPONSIBILITIES RELATED TO THIS DRAFT:

Reviewers are to validate the structure, content, comment on the key points and highlights that have been selected. All feedback is requested within this report using track changes or the comment function. **Please do not delete existing comments or content in the file without tracking the change.**

Reviewer/ approver of this draft:

Oliver Alvaro

TIMELINE:

- Review period: **April 25, 2025 – April 29, 2025**
- Consolidated comments on this document are to be shared with EY on **April 29, 2025**

NEXT STEPS:

- Second and final draft: **May 1, 2025**
- Board Approval of the S-211 Draft Report: **May 8, 2025**

For more information on the reporting requirements, Public Safety Canada’s Guidance can be located here [Guidance for entities](#)

DISCLAIMER:

Ernst & Young LLP (EY) prepared the Draft Report only for **PetroTal Corp.** and its subsidiaries pursuant to the agreement solely between EY and **PetroTal Corp.** and its subsidiaries. EY did not perform its services on behalf of or to serve the needs of any other person or entity. Our work has been limited in scope and time and more detailed procedures may reveal issues that this engagement has not. The procedures do not constitute an audit, a

review or other form of assurance in accordance with any generally accepted auditing, review or other assurance standards, and accordingly we do not express any form of assurance.

Restrictions on the use of our work product

Consistent with our engagement agreement, this Draft Report is intended solely for the information and use of the management of **PetroTal Corp.** and its subsidiaries and is not intended to be and should not be used by anyone other than these specified parties. While we believe the information obtained is substantially responsive to your request, we are not in a position to assess its sufficiency for your purposes. In addition, we have no responsibility to update the Draft Report for events or circumstances occurring after the date of the Draft Report.

Interpretation and selection of entities in scope of the Fighting Against Forced Labour and Child Labour in Supply Chains Report

EY has not provided any guidance, advice, or recommendations to **PetroTal Corp.** and its subsidiaries to identify which entities are within the scope of the *Fighting Against Forced Labour or Child Labour Act* (“Act”). EY has not advised or influenced in any capacity, the interpretation and selection of the entities that are included in the Supply Chains Act (“Report Draft”). These decisions were made solely by **PetroTal Corp.**, and its subsidiaries and EY is neither liable nor accountable for these decisions, or any potential consequences that those decisions could have on **PetroTal Corp.** and its subsidiaries’ compliance with the Act, or the quality, truthfulness, or completeness of the Report Draft.

Fighting Against Forced Labour and Child Labour in Supply Chains Draft Report and Public Safety Canada Questionnaire

EY’s work was advisory in nature and did not include any validation or assessment to determine the accuracy of the information provided by **PetroTal Corp.** and its subsidiaries, included in the Report Draft or the draft responses contained in the Public Safety Canada Questionnaire excel file. EY understands **PetroTal Corp.** and its subsidiaries’ internal legal counsel has reviewed the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”), the Report Draft, and the Public Safety Canada Questionnaire excel file in detail to ensure the accuracy of the content. **PetroTal Corp.** and its subsidiaries has acknowledged it is its responsibility to obtain a third-party compliance check to verify the Draft Report and Public Safety Canada excel deliverables satisfy the Act’s legislative requirements. **PetroTal Corp.** and its subsidiaries is responsible for obtaining the required approval and attestation of the Final Version of the Report Draft by its governing body or bodies. In addition, **PetroTal Corp.** and its subsidiaries is responsible for ensuring the Report and Questionnaire are submitted to Public Safety Canada in advance of the May 31, 2024, deadline, and for publishing the approved Report in a prominent place on its website.

1. Introduction

This report (“the Report”) is the second Supply Chains Act Report submitted pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (“Act”) by **PetroTal Corp.** (“the Corporation”) and its subsidiaries listed below (collectively “PetroTal” or the “Company” or “we” or “our”). The activities described in this Report pertain to the fiscal year beginning on January 1, 2024, and ending on December 31, 2024 (“Reporting Period”). The following companies are subsidiaries of PetroTal Corp. under the Act and are referred to as “subsidiaries” in this Report:

- PetroTal USA Corp.
- PetroTal Peru S.R.L.
- Petrolifera Petroleum del Peru S.R.L.

The Report outlines the steps that PetroTal Corp. and its subsidiaries have taken during the reporting period to prevent and reduce the risk that Forced Labour or Child Labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

2. Steps Taken in the Previous Financial Year to Prevent and Reduce Risks of Forced Labour and Child Labour

PetroTal Corp., PetroTal USA Corp., PetroTal Peru S.R.L., and Petrolifera Petroleum del Peru S.R.L. are committed to respecting human rights, acknowledging the potential impact that our activities and supply chains may have on the economic status and fundamental rights of our people. In line with the Universal Declaration of Human Rights by the United Nations, we prioritize the dignity and rights of all individuals in our value chain of our operations. The Company’s employees, contractors, subcontractors, suppliers, vendors, and those with whom the Company conducts business must not engage in any practice that constitutes a violation of human rights. We demonstrated a strong commitment to human rights by integrating international standards and principles into our policies. This includes respecting and working within the framework the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the International Labor Organization (ILO) Declaration on International Labor Principles. Furthermore, we are progressively incorporating human rights clauses into third-party contracts, as part of a phased approach applied to new contractual agreements.

Previously, the company established a Whistleblower Policy, enabling individuals to report any violations confidentially. Furthermore, PetroTal's Purchasing and Contracting Procedure includes a comprehensive evaluation of new suppliers, assessing various factors such as financial stability, environmental management, health and safety standards, and legal compliance, thereby promoting a thorough vetting process. Additionally, PetroTal maintains a Risk Management Policy and Manual as part of its Integrated Management System, which encompasses activities related to the exploration, exploitation, and commercialisation of hydrocarbons in Peru. This framework can potentially integrate considerations regarding Forced Labour and Child Labour in the future.

Lastly, PetroTal's Community Relations Plan in Peru emphasizes the integration of environmental management with community engagement, highlighting a commitment to social management, sustainability, and strict prohibitions against child and Forced Labour.

During this Reporting Period, we carried out the following:

- Mapped our activities and a sample of a sample of Tier 1 suppliers in our supply chain to identify areas of risk related to Forced Labour and Child Labour
- Conducted an inherent risk assessment on all sample suppliers to identify potential areas of risk related to Forced Labour and Child Labour.

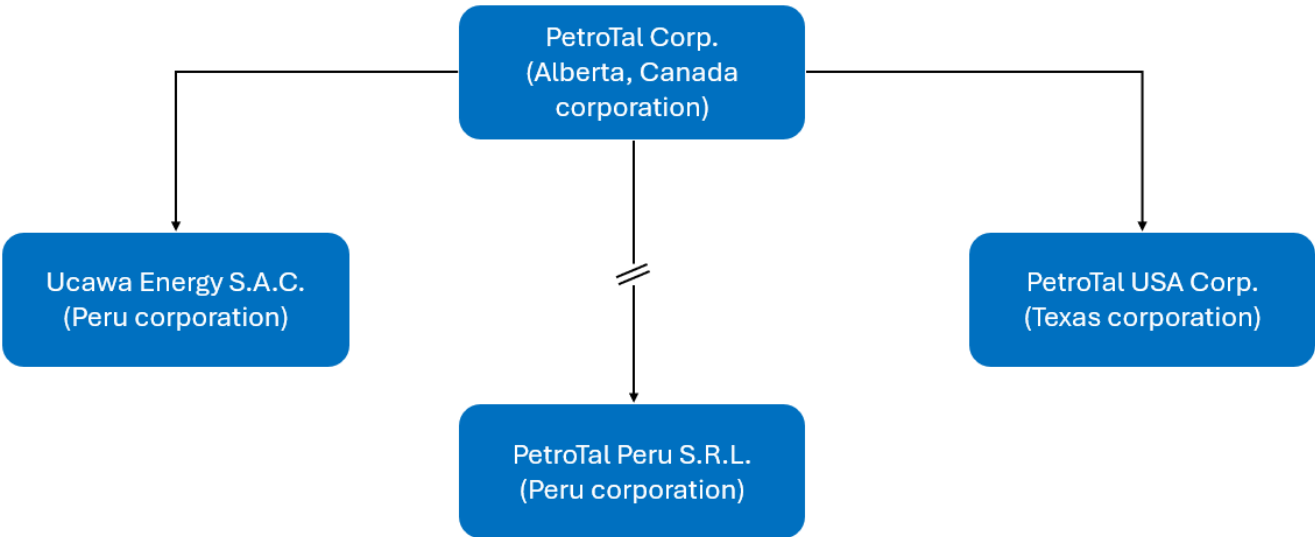
PetroTal Corp. and its subsidiaries acknowledge the ongoing nature of our efforts to address Forced Labour and Child Labour risks and are committed to enhancing our understanding and management of these risks in our supply chains and operations.

3. Our Structure, Activities and Supply Chains

3.1 Structure

On December 18, 2017, the Company completed a plan of arrangement (the Reverse Takeover “RTO”) with Sterling Resources Ltd. pursuant to which Sterling acquired all the shares of “old” PetroTal and once amalgamated, continued as one operation under the name of Sterling Resources Ltd. The name of the Company was changed in June 2018 to PetroTal Corp. In 2018, the Company amended its articles for AIM compliance and began trading on the Alternative Investment Market (AIM) with the symbol "PTAL". Headquartered in Houston, Texas, with a registered office in Calgary, Alberta, PetroTal Corp. is a reporting entity in multiple Canadian provinces and since February 16, 2023, trades on the Toronto Stock Exchange (TSX) as "TAL", and continued on OTCQX as "PTALF", and on AIM as "PTAL". Here is a description of the organizational framework for our parent company and its subsidiaries:

Figure 1 Structure of PetroTal Corp. reporting entities



Governance

The company adheres to Canadian corporate governance standards suitable for a listed company, with a code of conduct and a Board mandate in place. The Board of Directors is responsible for overseeing the company's day to day operations, focusing on long-term shareholder value, strategic planning, regulatory compliance, safe operations, and management oversight. The Board is supported by specialized committees, including Audit, Corporate Governance and Compensation, Reserves, and Health, Safety, Environment, and Corporate Social Responsibility.

The Board is responsible for the continuous review and enforcement of health, safety, and environmental policies, as well as evaluating the company's social impact, with all outcomes reported to the Board of Directors. The Human Resources and Occupational Health and Safety departments manage employee-related issues. In December 2024, PetroTal Peru S.R.L formally established a cross-functional Human Rights Committee, bringing together representatives from key departments including Human Resources, Procurement, Security, Compliance, Operations and Legal among others. The PetroTal leadership team, which includes various departments, works in unison on significant issues, providing regular reports to the CEO and the Board, including weekly and quarterly updates on social responsibility and sustainability matters. In the future, we plan to formally integrate the prevention of Forced Labour and Child Labour into our governance structure, leveraging our proactive community involvement, compliance with social risk legislation, and commitment to ethical conduct.

Membership Associations

We are linked with business associations including the Peruvian Society of Hydrocarbons, the SNMPE, the American Chamber of Commerce of Peru, the Canadian Chamber of Commerce, the Chamber of Commerce, Industry and Tourism of Loreto and the Chamber of Commerce of the Indigenous Peoples of Peru. We participate in these associations through the Sustainability Committee, Human Rights Committee, and Communications Committee, among others.

3.2 Activities

Since incorporation, the Company has engaged in acquiring rights and exploring, developing, and producing crude oil and natural gas. Initially concentrating on onshore projects in Canada and the U.S., the company expanded its operations internationally in 1997. Following a management change in December 2017, the Company shifted its focus to executing a development and exploration strategy for its business operations in Peru.

PetroTal Corp.

PetroTal Corp. operating solely as a holding entity with 100% ownership of its subsidiaries, does not engage in the production, distribution, or importation of goods, nor is it involved in direct operational activities. The holding entity helps in the marketing and selling of crude oil. As of December 31, 2024, it maintains a workforce of zero employees. PetroTal Corp. controls and manages PetroTal USA Corp., PetroTal Peru S.R.L., and Petrolifera Petroleum del Peru S.R.L.

PetroTal USA Corp.

PetroTal USA Corp., a subsidiary fully owned by PetroTal Corp., incorporated in the United States, serves as the company headquarters. It primarily focuses on executive and senior management support for operations in Peru and the exploration of new business opportunities. Despite its strategic role, PetroTal USA Corp. does not conduct any oil and gas field operations within the United States, nor does it engage in the production, sale, distribution, or importation of goods. The company remains uninvolved in direct operational or commercial activities in the United States and sustains a workforce of 17 employees.

PetroTal Peru S.R.L.

PetroTal Peru S.R.L., is a wholly owned subsidiary of PetroTal Corp. and is incorporated in Peru. It is the largest onshore crude oil producer in the country as of early 2022. It focuses on the Bretana field in Block 95, which is its only producing asset, supported by a robust supply chain. As of December 31, 2024, PetroTal Peru employs 200 people and has increased its oil production from zero to approximately 20,000 barrels of oil per day (BOPD) in six years. The company's strategy emphasizes value creation through the development and exploration of oil assets, with a strong commitment to environmental and social responsibility principles guiding its business decisions.

Petrolifera Petroleum del Peru S.R.L.

Petrolifera Petroleum del Peru S.R.L., incorporated in Peru and fully owned by PetroTal Corp., is engaged in the exploration of prospects and leads within Block 107 in Peru. At present, the block is inactive, generating no

revenue, and maintains a workforce of zero employees, rendering the company dormant and purely exploratory for the time being.

3.3. Supply Chains

PetroTal Corp. and its subsidiaries have mapped our Tier 1 supply chain. Below, we describe the characteristics of a sample of our Tier 1 suppliers, selected based on their potentially high inherent risk profile due to the nature of the goods and services they provide. It is important to note that these suppliers do not represent all Tier 1 suppliers but rather a targeted sample for analysis.

To gain a deeper understanding of our Tier 1 suppliers and their impact on our supply chain, we have compiled a series of tables that provide valuable insights into spending patterns and supplier distribution. Together, these insights will aid supplier management and risk mitigation strategies.

The majority of PetroTal Tier 1 suppliers have a significant concentration of spending in South America. Most of the other suppliers are located across North America, while other regions account for less.

Table 1 Sector Breakdown of PetroTal and Subsidiaries’ Tier 1 sample Suppliers

Sector (NAICS 2022 – Level 1)
Manufacturing
Construction
Transportation and warehousing
Utilities
Administrative and support, waste management and remediation services
Professional, scientific and technical services
Other

PetroTal Corp.
PetroTal Corp, listed on the Toronto Stock Exchange, specializes in the oil and gas development sector in Peru. The company maintains a streamlined supply chain for its operations, with most of their suppliers belonging to the finance and insurance sector. The company holds no involvement in the production, marketing, distribution, or importation of goods and remains unengaged with operational or commercial activities in the Canadian oil and gas markets. As a holding entity, PetroTal Corp owns and manages three subsidiaries: PetroTal USA Corp., PetroTal Peru S.R.L., and Petrolifera Petroleum del Peru S.R.L., ensuring a focused and efficient approach to its business endeavors in the Peruvian oil and gas industry.

Table 2 Sector Breakdown of PetroTal Corp.'s Tier 1 Suppliers

Sector (NAICS 2022 - Level 1)
Finance and insurance
Professional, scientific and technical services
Information and cultural industries
Mining, quarrying, and oil and gas extraction
Manufacturing

PetroTal USA Corp.

PetroTal USA Corp., a wholly owned subsidiary of PetroTal Corp. and incorporated in the United States, serves as the company's headquarters, focusing on executive and senior management support for operations in Peru and exploring new business opportunities. Although it plays a strategic role, PetroTal USA Corp. does not engage in any oil and gas field operations within the United States, nor does it handle the production, sale, distribution, or importation of goods, remaining detached from direct operational or commercial activities in the United States. The headquarters' main spend is on suppliers in the administrative and support, waste management and remediation services sector.

Table 3 Sector Breakdown of PetroTal USA Corp.'s Tier 1 Suppliers

Sector (NAICS 2022 - Level 1)
Administrative and support, waste management and remediation services
Professional, scientific and technical services
Finance and insurance
Information and cultural industries
Real estate and rental and leasing

PetroTal Peru S.R.L.

PetroTal Peru S.R.L., the largest onshore crude oil producer in Peru and a subsidiary of PetroTal Corp., maintains a strategic supply chain concentrated on the Bretana field in Block 95. The supply chain is supported by local Tier 1 suppliers, with the top three spanning sectors by spend including manufacturing, construction, and transportation and warehousing. This localized and specialized supply chain is vital to PetroTal Peru S.R.L.'s sustained production and operational efficiency.

The manufacturing and construction sectors account for most of PetroTal Peru S.R.L.'s spending. However, the concentration of suppliers is primarily in the manufacturing and professional, scientific, and technical services sectors. This distribution indicates that while manufacturing and construction are major areas of expenditure, a diverse supplier base exists within the professional, scientific, and technical services sector.

Table 4 Sector Breakdown of PetroTal Peru S.R.L.'s Tier 1 Suppliers

Sector (NAICS 2022 - Level 1)
Manufacturing
Construction
Transportation and warehousing
Utilities
Professional, scientific and technical services
Administrative and support, waste management and remediation services
Wholesale trade
Mining, quarrying, and oil and gas extraction
Finance and insurance
Other services (except public administration)
Other

Petrolifera Petroleum del Peru S.R.L.

Petrolifera Petroleum del Peru S.R.L., a subsidiary of PetroTal Corp. based in Peru, specializes in the exploration of potential oil and gas sites within Block 107 in Peru. Currently, the block is not in production, which means there is no active supply chain management or engagement with vendors, as the company's operations are solely focused on exploration activities and have not yet transitioned into extraction or distribution phases. The entity has one supplier in the transporting and warehousing sector.

4. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

As PetroTal Corp, PetroTal USA Corp., PetroTal Peru S.R.L. and Petrolifera Petroleum del Peru S.R.L. PetroTal, are dedicated to operating with integrity, adhering to all relevant laws, regulations, and internal guidelines, including international standards specific to our industry. Our compliance framework is integrated across the organization, with each department upholding the principles outlined in our corporate and local policies, as well as those specific to their functions as detailed in the manuals and procedures of PetroTal's Integrated Management System (IMS). A key objective for our company is to conduct business responsibly and ethically, ensuring safe and stimulating work environments for our employees and contractors. We recognize the importance of familiarizing all personnel with our general business conduct policies to fulfill our strategic mission.

In line with our commitment to ethical business practices, we have established policies and manuals to guide our employees and management. These include the Code of Business Conduct and Ethics, the Community Relations Plan (PRC), the Integrated Management System (IMS), the Human Rights Policy Management Plan and Human Rights Policy. These documents and practices form the backbone of our internal compliance program and reflect our longstanding commitment to upholding the highest legal and ethical standards. Looking ahead, we plan to standardize these policies across all relevant subsidiaries and make them available in both English and Spanish, with the aim of reinforcing our stance against Child Labour and Forced Labour and ensuring these principles are uniformly understood and implemented throughout our operations.

Code of Business Conduct and Ethics

PetroTal Corp. and its subsidiaries uphold a Code of Conduct that outlines the expected standards of ethical behavior, legal compliance, and professional responsibility from all personnel, including directors, officers, employees, consultants, and contractors. The Code promotes respect, communication, safety, and integrity, and is enforced by the Board of Directors to ensure fair dealings and environmental responsibility. Managers are responsible for disclosing violations to the Chief Financial Officer and seeking advice when needed. It requires informed judgment, mandates compliance with laws, and prohibits conflicts of interest while encouraging the reporting of violations without fear of retribution. Non-compliance can lead to disciplinary action, including termination. Annual certification of adherence to the Code is mandatory for continued employment as well as upon hiring, emphasizing the company's dedication to ethical practices and social responsibility.

The Community Relations Plan

In Peru, PetroTal Corp.'s Community Relations Plan is an integral part of the Environmental Management Strategy designed to guide environmental management throughout different project phases. The PRC outlines specific actions for supervision, communication, and engagement with local communities, focusing on employment and development opportunities. It includes a Code of Conduct for operating facilities, emphasizing social management and sustainability, as well as procedures for hiring local labour and procuring local products and services, with strict prohibitions against Child Labour and Forced Labour. The PRC's implementation is mandatory during construction, operation, maintenance, and abandonment stages of a project.

Procedure for Hiring Local Labour

PetroTal Perú S.R.L. is implementing and continuously improving a procedure that sets the framework for hiring local labour within the areas impacted by its projects, in line with the company's Social Management and Sustainability policies and commitments outlined in the Environmental Impact Studies. These hiring practices are also in agreement with discussions from roundtables with local communities and are aligned with the United Nations Sustainable Development Goals. The procedure explicitly addresses Child Labour, stating:

"PetroTal promotes and protects the rights of children and adolescents in the localities and communities of its areas of influence. In this regard, PetroTal rejects Child Labour in all its forms and urges its contractors and subcontractors to adhere to this practice." (Translated from Spanish)

Procedure for Procurement of Products and Contracting of Local Services

PetroTal Perú S.R.L. is implementing and continuously improving a procedure for the procurement of local products and services to support the communities within the areas affected by its projects. This procedure applies to all PetroTal's operations in Peru and asks strict adherence during the acquisition of local goods and services for both exploratory and developmental activities. Designed by the Social Management and Sustainability team, the procedure aims to meet the expectations of the local

population and adhere to the policy of good practices in engaging with the communities located in the regions where PetroTal operates. The procedure explicitly addresses Forced Labour, stating:

"It is prohibited to purchase or provide services under any form of slavery or abuse of power or human trafficking." (Translated from Spanish)

Integrated Management System (IMS)

At PetroTal Corp. and our subsidiaries, we have established an integrated management system (IMS) that emphasizes responsible business practices across our value chain. This system is articulated through a comprehensive set of policies, procedures, manuals, and guidelines, all of which are available for public review on both of our websites PetroTal Energy (petrotalcorp.com) and PetroTal (petrotal.pe). Central to the system are policies on compensation, local value creation, and operational conduct. IMS also incorporates a multifaceted approach to addressing complaints and grievances, considering human rights, gender equality, cross-cultural, and environmental issues. Stakeholder engagement is encouraged via open dialogue and transparent communication, with complaint resolution processes evaluated in meetings and designed to conclude within 30 working days. Additionally, as part of IMS, our Whistleblowing Policy ensures confidentiality through an independent service provider, enhancing the company's dedication to ethical conduct, financial integrity, and adherence to legal standards, see below for more details:

Whistleblowing Policy

We at PetroTal Corp and our subsidiaries have established a whistleblowing policy, in line with regulatory authorities' investor confidence rules in the United States and Canada. It establishes procedures to address the receipt, retention, and treatment of complaints received by the corporation regarding matters related to fraud, accounting, internal accounting controls, auditing, violations of the corporation's Code of Business Conduct and Ethics, or any other activity that is illegal, unethical, contrary to the company's policies, or otherwise improper or inappropriate. This policy allows employees and other interested parties to report without fear of retribution. To facilitate anonymous reporting, confidentiality, and prohibition of retaliation, we have partnered with a third-party reporting system provided by Ethico at the following:

- Website address: <https://petrotal.compliancelinemcr.com/>

We have implemented a system for maintaining Logs of all complaints and concerns, which are supervised by the Corporate Secretary under the direction of the Chair of the Audit Committee. Each submission is documented with details of the allegations, actions taken, and the status, whether pending or closed, with a final statement on the resolution of closed cases. The Audit Committee retains full access to these Logs and all related reports, ensuring oversight while preserving the anonymity of the complainants.

Human Rights Management Plan

At PetroTal Corp. and our subsidiaries, we respect human rights, acknowledging their universal, indivisible and interdependent nature. We integrate them in a transversal manner and as a pillar of our management. This implies recognizing how our employees and neighbors related to a project may be affected throughout the value chain.

Human Rights Policy

As part of our Safety, Health, Environmental Management, Social Management, Sustainability and Human Rights Policy, which is currently available in Spanish on our PetroTal website, this policy must be followed by all personnel and contractors engaged in our Peruvian operations. The policy outlines our commitment to respecting the human rights of everyone affected by our activities, including employees, partners, contractors, communities, local populations, and customers. We are dedicated to conducting due diligence on human rights throughout all our activities, identifying and assessing potential impacts associated with the development of our operations at every stage and to implement appropriate measures for prevention or mitigation. We promote zero-tolerance of human rights violations by our employees, contractors, and strategic partners.

Human Right Clauses in Third Party Contracts

In our Peru Operations at PetroTal, we are progressively incorporating human rights clauses into third-party contracts, as part of a phased approach applied to new contractual agreements. These are grounded in the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. These clauses mandate that contractors adhere to relevant modern anti-slavery legislation and report any actions or behaviors related to acts of slavery to the company. Likewise, our agreements with security service providers incorporate clauses dedicated to the protection and advancement of the Voluntary Principles on Security and Human Rights.

The policy and procedures previously mentioned are developed in accordance with international standards, including the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, and the Human Rights Due Diligence Guidance. Furthermore, we utilize a Human Rights and Voluntary Principles evaluation matrix for our security contractors, which mandates that they implement a Training Plan encompassing instruction on the use of force in line with national standards. These practices are currently in effect within our Peruvian Operations. In our daily operations, we incorporate respect for human rights throughout the value chain, which is why we promote the elimination of Forced Labour, Child Labour, and discrimination. We present the Human Rights Policy to suppliers so that they are aligned with the company's actions. In upcoming reporting periods, we aim to standardize these practices across PetroTal Corp and its subsidiaries.

5. Forced Labour and Child Labour Risks

During the reporting period, PetroTal Corp. engaged a third-party to conduct an inherent risk assessment of its operational activities and a sample of Tier 1 suppliers procured between January 1, 2024, and December 31, 2024. The third-party utilized a methodology that analyzes data based on country risk, industry risk, and industry controversy.

It is important to note that the potential inherent risk levels related to Forced Labour and Child Labour do not account for any specific due diligence or governance measures implemented by PetroTal or its individual suppliers. The defined risk levels range from high to low, reflecting varying degrees of potential inherent risk.

Following the inherent risk assessment, some operational activities were identified as having high or medium-high potential inherent risks related to Forced Labour and/or Child Labour, particularly within the sectors of construction, transportation and warehousing, and administrative and support, waste management and remediation services.

Furthermore, several suppliers were identified as potential high or medium-high inherent risk for Forced Labour and/or Child Labour associated with the following sectors for PetroTal Corp. and its subsidiaries:

Table 5 Potential High and Medium-High Inherent Risk Suppliers for Forced Labour and Child Labour by NAICS (2022) Sector for PetroTal Corp. and Its Subsidiaries

Potential high inherent risk level sectors for Forced Labour and Child Labour
Manufacturing
Construction
Potential medium-high inherent risk level sectors for Forced Labour and Child Labour
Transportation and warehousing
Administrative and support, waste management and remediation services
Manufacturing
Construction
Information and cultural industries
Professional, scientific and technical services

These results are based on suppliers’ maximum Forced Labour and Child Labour potential inherent risk rating. Maximum risk refers to the highest level of inherent risk that is present across both Child Labour and Forced Labour risk factors. Suppliers that operate within the same sector may have various risk levels due to country of operations.

The findings from this assessment, which identify areas with inherent risks of Forced Labour and Child Labour, will help prioritize due diligence efforts and improve the management of exposure to Forced Labour and Child Labour within our operations and supply chains. The results have been utilized to select priority suppliers for the ongoing residual risk assessment, which will evaluate the actual risks associated with these suppliers.

6. Measures Taken to Remediate Forced Labour or Child Labour

As of now, we have not identified any instances of Forced Labour or Child Labour in our activities or supply chains; however, we have recognized potential inherent risks in these areas which are now under further evaluation.

PetroTal Corp. and PetroTal Peru S.R.L have an existing grievance mechanism, as described in section 4.3 for identifying adverse impacts. Should any adverse impacts be identified in the future, we will consider appropriate remediation measures. In the event of non-compliance, the Corporation is committed to developing and implementing a corrective action plan to address and remedy the situation.

7. Remediating the Loss of Income to the Most Vulnerable Families

PetroTal Corp. and its subsidiaries recognize that efforts to prevent and reduce the risks of Forced Labour and Child Labour can unintentionally lead to loss of income for the most vulnerable families. To date, PetroTal Corp. is not aware of any instances where its risk mitigation efforts related to Forced Labour or Child Labour in its activities and supply chains have resulted in income loss for vulnerable families.

8. Training Provided to Employees on Forced Labour and Child Labour

We currently do not provide specific training to employees, contractors, or suppliers solely focused on the risks associated with Forced Labour and Child Labour. However, through PetroTal Peru S.R.L., we have developed video training materials on our Code of Business Conduct and Ethics. These materials are presented in Spanish with English subtitles and emphasize the importance of respecting human rights for all individuals, including employees, contractors, and the communities where PetroTal operates. They also outline the grievance procedure for reporting any incidents or events. Additionally, we offer a workshop on security and human rights, focusing on the Voluntary Principles and their practical application.

During the reporting period, we have developed a training module on Human Rights Policy, Child Labour, and Forced Labour aimed at our staff and contractors through PetroTal Peru S.R.L. to address these inherent risks in our operations and supply chains. At PetroTal Corp. and its subsidiaries, we recognize the need to enhance our staff's ability to recognize, comprehend and effectively manage these risks. We anticipate that training resources will be updated and enhanced in future reporting periods.

9. Assessing Our Effectiveness I

PetroTal Corp. and its subsidiaries are committed to developing a strategy for the prevention of Forced Labour and Child Labour, which will allow us to periodically evaluate the success of our initiatives. Our dedication is centered on progress, strengthening our capacity to detect and lessen the risks of Forced Labour and Child Labour within our operational activities and supply chains in future reporting cycles. Our intent is to reinforce the groundwork we have established through our policies and grievance mechanism and align our practices and goals with the Fighting Against Forced Labour and Child Labour Act.

10. Board of Directors Approval and Attestation Statement

This Report was Approved by the Chair of the Board of PetroTal Corp., pursuant to section 11(4)(b)(ii) of the Act.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chief Legal Counsel, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities 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.



I have the authority to bind **PetroTal Corp.**

Sudan I. Maccio
Chief Legal Counsel
May 28, 2025