

Modern Slavery Report

2025



ASPENLEAF
ENERGY LIMITED

Introduction

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2025 to December 31, 2025 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9 (the “Act”). This Report is made on behalf of Aspenleaf Energy Limited (“Aspenleaf” or the “Company”).

Aspenleaf recognizes the importance of the standard in relation to our oil & gas operations, which are predominately in Western Canada and the supply chains that support our operations. We strive to adhere to the highest ethical standards to the most pragmatic extent possible, which includes making best efforts towards the prevention and identification of forced labour and child labour in our supply chain. The intention of this report is to outline the approach Aspenleaf has taken during 2025 to address and mitigate the risk that forced labour or child labour is used at any step in the production of goods by Aspenleaf or of goods imported into Canada either directly by Aspenleaf or on behalf of Aspenleaf by a third party.

During the year ended December 31, 2025, Aspenleaf took the following steps to prevent and reduce the risk of forced labour and child labour in our business and supply chains:

- Continued to conduct an ongoing risk assessment to identify potential deficiencies in our operations and supply chain, including a high-level review of the geographic sourcing of key materials and services used in our operations to better understand the relative mix of domestically sourced inputs compared to those obtained through international supply chains

Entity structure, activities and supply chain – Section 11(3)(a)

Aspenleaf is an oil and gas company headquartered in Calgary, Alberta, Canada. We are engaged in the exploration and development of oil and gas properties located in Alberta with a primary focus on the development of the Swan Hills, Leduc and Twining areas. Aspenleaf’s supply chain includes businesses that supply goods and services to our organization, primarily encompassing various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for our operations in developing and maintaining our conventional oil and gas properties.

The suppliers we engage include businesses that are primarily local and adhere to regulations in Canada for oil and gas production, which are among the highest and most regulated standards in the world.

Policies and due diligence processes in place related to forced labour and/or child labour – Section 11(1)

Through our organizational policies we communicate our values and expectations to our employees, contractors and our business partners. Aspenleaf sets a high standard for ourselves and all of our stakeholders and does not tolerate any forms of forced labour or child labour. We make our expectations clear to our suppliers and on procurement of their goods and services, that we expect them to fully abide by the laws and regulations in place. We recognize we may have some constraints due to our smaller size and organizational capacity, however we are committed to continuous improvement and strive to put processes and policies in place which are reasonable and pragmatic that could also be effective in preventing the use of forced and child labour. The relevant policies and processes are discussed in further detail below:

Due Diligence

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. We acknowledge that employees working outside our primary supply chain can be exposed to the potential risk of forced labour or child labour. In order to mitigate this risk, we strive to ensure that any supplier we conduct business with is

a reputable vendor, with a strong reputation, is aligned with our values and follows industry standard operating best practices.

Code of Conduct and Ethics

We are committed to conducting our business in a lawful and ethical manner. Our Code of Conduct and Ethics (“the Code”) is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Aspenleaf employees should always act lawfully, ethically and in the best interests of Aspenleaf. All directors, officers, employees, and contractors of Aspenleaf, are expected to conduct themselves and act with fairness and provide a safe and respectful work environment, where all individuals are treated with dignity and respect. As outlined in the Code, all employees, officers, contractors, consultants, directors, business partners and suppliers of the Corporation must comply with all applicable laws, rules and regulations in the areas in which we operate.

Whistleblower Policy

Aspenleaf’s Whistleblower Policy provides a mechanism for employees to report concerns regarding wrongdoing without fear of victimization, subsequent discrimination or disadvantage. The Whistleblower Policy is intended to encourage and enable employees to raise serious concerns within Aspenleaf rather than overlooking a problem or seeking a resolution for the problem outside Aspenleaf. The Whistleblower Policy applies to all employees and those contractors working for Aspenleaf. During 2025, the Whistleblower Policy continued to be communicated to all employees to ensure ongoing awareness of what constitutes misconduct under the Act and to encourage prompt reporting of any concerns.

Our Commitments

Aspenleaf is committed to consistently evolving and improving and makes every effort, including diligent monitoring of Aspenleaf operations and the performance of our suppliers, to prevent our activities having any negative impact on human rights. The following practical considerations may be implemented by Aspenleaf to address and mitigate future risks associated the Act:

- Continue to conduct an ongoing risk assessment to identify potential deficiencies in our operations and supply chain
- Aspenleaf will endeavor to have its primary suppliers confirm that no forms of exploitive labour are used

- Work toward providing increased employee training and awareness on modern slavery, including forced labour and child labour, practices and risks
- We intend to provide a more accessible method (such as having the Whistleblower Policy and appropriate contact information posted on the Corporate website) for other stakeholders (suppliers, customers, shareholders etc.) to voice their concerns regarding Aspenleaf's business conduct and supplier usage in an effort to help identify and mitigate any risks
- Assess our internal policies, controls and processes for methods of identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

Steps taken 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 – Section 11(1)

Aspenleaf strives to ensure that forced labour and child labour are not taking place in our supply chains and operations, including through our recruitment and employment practices. Aspenleaf does not knowingly engage in forced labour or child labour or partner with any supplier who does. Our Code and Whistleblower Policy requires all employees and contract workers of Aspenleaf to report actual or possible misconduct. Aspenleaf's Whistleblower Policy provides a mechanism through which we can address concerns regarding violations of policies.

We are committed to reviewing our risk assessments and implementing any necessary remediation measures should the need arise in the future. Going forward management will prepare an annual Modern Slavery Report and present it to the Board, which will include the steps taken during the previous year to prevent and reduce the risk that forced labour or child labour is being used in its supply chain or operations.

Aspenleaf personnel at all levels are required to adhere to our Code and ensure that it is understood and properly applied to their daily activities. Every new employee of Aspenleaf upon acceptance of employment is agreeing to the Code and is informed of how to report wrongdoing under our Whistleblower Policy. We strive to provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? – Section 11(3)(c)

No. Aspenleaf has continued to identify risks and assess our supply chain, and thus far has not identified any instances of forced labour or child labour in either our operations or supply chain. The majority of inputs into Aspenleaf's supply chains in 2025 came from within North America where the risks of forced labour and child labour are relatively low compared to other countries. Nevertheless, similar to any business the potential risk of forced labour or child labour in Aspenleaf's supply chain remains on account of tier two and tier three suppliers, as well as suppliers further down the supply chain.

Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains? – Section 11(3)(d)

No. Aspenleaf has not identified any forced labour or child labour in our activities and supply chains.

Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? – Section 11(3)(e)

No. Aspenleaf has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in their activities and supply chains.

Does the organization currently provide training to employees on forced labour and/or child labour? – Section 11(3)(f)

No. All employees by acceptance of employment agree to comply and adhere to the Code and Whistleblower Policy. The Code is designed to ensure that personnel are aware of Aspenleaf’s standards of ethical business practice and expectations regarding ethical conduct, including the obligation to act with fairness and to provide a safe and respectful work environment, where all individuals are treated with dignity and respect.

During 2025, Aspenleaf continued to build awareness among employees of the requirements of the Act. As part of our ongoing risk assessment activities, we undertook a high-level review of the geographic sourcing of key materials and services used in our operations to better understand relative exposure to labour-related risks in our supply chain.

Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? – Section 11(3)(g)

No. Aspenleaf is currently reviewing and considering what policies would be most effective in ensuring that forced labour and child labour are not being used in its activities and supply chains. At the present time the following is in place:

- Management reviews and assesses the organization’s policies and procedures related to due diligence and vendor procurement
- Aspenleaf encourages stakeholders to share concerns related to violations of the Code, policies or applicable laws via a confidential whistleblower system

Approval & Signature

This Report was approved by Aspenleaf’s Board of Directors on May 7, 2026, and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada.

This Report is also available on our website at www.aspenleafenergy.com



Attestation

In accordance with the requirements of the Act, and in particular section 11(4)(b)(ii) 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 in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Aspenleaf Energy Limited.

Keith Pomedli

Keith Pomedli
President & CEO
May 7, 2026

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Advisories

Forward-Looking Information and Statements

Forward-looking statements are based on the estimates and opinions of the Company's management at the time the statements are made. Readers are cautioned not to place undue reliance on forward-looking statements, as there can be no assurance that the plans, intentions or expectations upon which they are based will occur. Aspenleaf Energy Limited assumes no obligation to update forward-looking statements should circumstances or management's estimates or opinions change. The forward-looking statements contained in this presentation are expressly qualified by this cautionary statement.