



# 2024 Modern Slavery Report

## Tuktu Resources Ltd.

### Introduction

This report ("Report") is made on behalf of Tuktu Resources Ltd. ("Tuktu" the "Company", "we" or "our") pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). The report constitutes our first report pursuant to the Act, includes our forced labour or child labour reporting statement for the financial year ending December 31, 2024 and sets out steps taken to prevent and reduce the risk that forced labour or child labour is being used at any step in our business and supply chains.

### Steps Taken During the Reporting Period

During 2024, Tuktu took the following steps to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- Continued educational efforts to increase awareness among our senior management about our human rights policies and procedures concerning forced labour or child labour.
- Continued to conduct high-level assessments of suppliers based on where the supplier is located or is likely to source materials from

### Structure, Activities and Supply Chains

Tuktu Resources Ltd. is incorporated under the laws of the Province of Alberta and is listed on the TSX Venture Exchange under the symbol "TUK". The Company is in the business of oil and natural gas exploration, development and production in southern Alberta. Tuktu currently operates all of its assets.

On December 31<sup>st</sup>, 2024, Tuktu employed five full time employees who are located in its head office in Calgary, Alberta.

Tuktu is committed to managing and operating in a safe, efficient, and environmentally responsible manner in association with our industry partners and are committed to continually improving our environmental, health, safety, and social performance. In 2024, we procured goods and services across a wide range of categories and industry sectors and are committed to ensuring that our contracting and procuring activities are done in compliance with applicable law and our corporate policies. Tuktu's primary supply chain consists almost exclusively of goods and services originating in Canada and the United States, however, we do appreciate that it is possible some of the inputs to the goods being used by the Company could originate from other jurisdictions.

### Policies and Due Diligence Processes

Tuktu is committed to ensuring a healthy and safe work environment and values honesty and integrity in every aspect of our business and every level of our organization. Tuktu's Code of Business Conduct and Ethics ("Code of Conduct") requires the highest standards of professional and ethical conduct from, and sets out the expected behaviour of our directors, officers, employees, consultants, suppliers and contractors.

The Code of Conduct reflects Tuktuk's commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all employees are expected to comply.

The Company also has a Whistleblower Policy that encourages and protects employees in bringing complaints forward for any improper conduct or for a suspected violation of law or of Tuktuk's policies.

The Company plans to integrate human rights within our due diligence processes and aims to proactively establish and apply policies and procedures that firmly combat forced labour and child labour risks. This will require updating the Code of Conduct and Whistleblower Policy to thoroughly address risks associated with forced and child labour, liaising with stakeholders, and incorporating forced labour and child labour considerations into our operations. We acknowledge the significance of protecting human rights throughout our supply chain and business operations, and we are devoted to executing definitive measures to reach this objective.

### **Assessing and Managing Risk**

Tuktuk does not utilize forced or compulsory labour. All the Company's employees are above the legal employment age and are recruited and provided with working conditions and the payment of wages and benefits that comply with applicable laws and regulations.

With our operations being limited to Southern Alberta and the fact that the vast majority of our suppliers are located in Canada and the United States, we consider the overall risk of forced labour or child labour to be very low. In assessing the risk of forced or child labour in our supply chains our focus has been to evaluate suppliers based on select criteria, including the industry of our suppliers and whether a supplier is located, or is likely to source materials from higher risk jurisdictions. We do recognize however that there may be a risk that forced labour or child labour could exist in our supply chains, in particular, as it relates to suppliers supplying goods to our suppliers that originate from other countries. Tuktuk will continue to implement our policies and assess, understand, and mitigate these risks in our supply chains.

### **Remediation of Forced Labour or Child Labour**

In 2024, Tuktuk did not identify any instances of forced labour or child labour in our operations or supply chain. As a result, we have not had to take any measures to remediate any forced labour or child labour.

Tuktuk recognizes that efforts to prevent and reduce risks of forced labour and child labour can have the unintended consequence of contributing to the loss of income from the most vulnerable families. Remediation is a key step in this process and Tuktuk will endeavour to clearly outline the expectations for addressing remediation for individuals identified as victims of forced labour or child labour in future reporting periods.

### **Training**

The Company provides materials regarding the Act to the personnel responsible for procurement. Tuktuk's directors, officers, employees and contractors at all levels are required to adhere to the Company's corporate policies including the Code of Conduct. Our policies are renewed and approved by the Board of Directors on an annual basis and all of our staff are expected to review such policies on a regular basis. Tuktuk is planning to develop a training program for its officers, employees and contractors in procurement and supply chain roles. Furthermore, Tuktuk is dedicated to enhancing the capacity of our staff to comprehend, identify, and effectively manage the risks of forced labour or child labour within our operations and throughout our supply chains.

### **Assessing Tuktu's Effectiveness**

Tuktu has not yet implemented a system to evaluate how effective our efforts are in mitigating the risks of forced labour or child labour. We are aware of our responsibility in identifying and reporting these risks within our operations and supply chain. Our aim is to consistently enhance our capacity to gauge the effectiveness of these measures.

### **Approval and Attestation**

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Tuktu Resources Ltd. on May 22, 2025 and has been filed with the Minister of Public Safety and Emergency Preparedness.

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 entity or entities listed above. Based on my knowledge, and having exercised reasonable 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 period listed above.

I have the authority to bind Tuktu Resources Ltd.

(signed) "*Tim de Freitas*"

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Tim de Freitas  
President and Chief Executive Officer

May 22, 2025