

Fighting Against Forced Labour and Child Labour in Supply Chains Act

2025 Annual Report





Introduction

We believe business has a constructive role to play to advance respect for human rights. We recognize the dignity of all human beings, and our core values embrace the inalienable right of all people to live their lives free from social, political, or economic discrimination or abuse. We commit to respecting human rights and conducting business in a manner consistent with the Universal Declaration of Human Rights (UDHR) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Our approach is also informed by the UN Guiding Principles on Business and Human Rights.

This approach and our commitment to acting ethically and responsibly in all business relationships reflect our SPIRIT values which guide our operations.



We expect suppliers and contractors working on our behalf to be guided by these principles, and we are committed to continuous improvement, ensuring that our practices evolve to further enhance human rights protections throughout our operations and supply chains.

This Modern Slavery Report details our current initiatives and future plans to identify, prevent, mitigate, and communicate modern slavery risks in our operations and supply chains.

Our Reporting Entities and Structure

Our Reporting Entities

This Modern Slavery Report ("Report") is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and covers the reporting period from January 1, 2025 to December 31, 2025. This Report provides an overview of actions ConocoPhillips Canada has taken to identify, assess and address the risks of modern slavery during the reporting period, including forced labour and child labour, within our operations and supply chains.

For the purpose of this Report, ConocoPhillips Canada includes the following reporting entities:

- ConocoPhillips Canada Resources Corp. (BN: 89218 2981);
- ConocoPhillips Canada (BRC) Partnership (BN: 86539 3136);
- ConocoPhillips Surmont Partnership (BN: 88280 4313);
- Conoco Funding Company (BN: 88448 7711); and
- ConocoPhillips Company (BN: 88739 1169).



Our Structure

All five reporting entities are either direct or indirect subsidiaries of ConocoPhillips,¹ which is incorporated under the laws of Delaware and is headquartered in Houston, Texas. ConocoPhillips conducts activities in 14 countries, with approximately US\$122 billion in total assets, and approximately 9,900 employees as of December 31, 2025. Total global company production for the year averaged 2,375 thousand barrels of oil equivalent per day (MBOED). ConocoPhillips Canada's operations employed 771 people in Canada and produced 177 MBOED in 2025.

The first three reporting entities listed in the "Our Reporting Entities" section above are Canadian operating entities and are registered under Alberta law. The fourth reporting entity in the list, Conoco Funding Company (BN: 88448 7711), is a Canadian financing entity, registered under Nova Scotia law, that provides funding, as needed, for Canadian capital expenditures and operations. The last reporting entity in the list, ConocoPhillips Company (BN: 88739 1169), is incorporated under the laws of Delaware, and has limited activities directly in Canada, consisting primarily of the provision of employee services in respect of Canadian projects.

For more information, go to conocophillips.com.

2025 Achievements

In 2025 we completed the following commitments we had made in the previous reporting period, including:

- Applying our supplier screening and monitoring tool to more suppliers; and
- Rolling out our training on child and forced labour to our Human Resources team.

In addition to meeting the commitments above, ConocoPhillips Canada has continued to advance its approach to identifying and addressing modern slavery risks in 2025, resulting in greater visibility and understanding of forced labour and child labour risks across our operations and supply chains. This has included:

- Introducing a third-party risk screening and monitoring tool to establish a baseline understanding of social and human rights risks related to our critical suppliers;
- Conducting an updated supplier risk analysis using our third-party risk assessment tool;
- Continued engagement with the International Petroleum Industry Environmental Conservation Association (IPIECA). Through participation in IPIECA working groups and peer discussions, ConocoPhillips Canada has collaborated with industry peers on a range of topics, including human rights and modern slavery, through knowledge sharing of best practices;
- Conducting a Gap Analysis based on Public Safety Canada's updated guidance and International Reporting Template; and
- Expanding our communication and engagement activities through sharing posters and digital signage regarding our Code of Business Ethics and Conduct.

¹ Where the name ConocoPhillips appears in this Report, as opposed to another ConocoPhillips name, it refers to the ultimate parent company.



Our Activities and Supply Chains

Our Activities

ConocoPhillips Canada's operations consist primarily of:

- A 100% interest in the Surmont oil sands development in Alberta;
- A 100% working interest in the liquids-rich Montney unconventional development gas field in British Columbia;
- Unconventional exploration plays;
- Natural gas, crude oil, bitumen and natural gas liquids marketing activities; and
- Corporate operations, including functions related to health, safety and environment, supply chain, sustainable development, engineering, maintenance, shutdown, security, finance, information technology, human resources, legal and government and external affairs.

For further information about our Canadian Operations, refer to www.conocophillips.ca/who-we-are/our-operations/

Our Supply Chains

At ConocoPhillips Canada, sustainable supply chain practices are fundamental to our operations. We prioritize safety, quality, and sustainability in the selection and management of our suppliers and contractors. Through comprehensive and collaborative efforts, we have developed sourcing strategies and supplier standards that help ensure our supply chain aligns with our commitment to ethical business practices and SPIRIT values.

Achieving continuous improvement in our supply chain requires building strong relationships with our supply chain vendors and contractors. We maintain ongoing engagement with suppliers through business reviews, supplier relationship management collaboration and supplier audits.

The types of goods and services sourced by ConocoPhillips Canada include:

- Drilling Services and Oil & Gas Production (including diesel and fuel)
- Construction Services & Materials
- Equipment, Machinery & Tools
- Professional Services (including external engineering and corporate services)
- Chemicals
- Maintenance, Repair and Operations
- Waste Management
- Hospitality
- Logistics
- Utilities (including electric and water utilities)
- Telecommunication Services (including software and IT services)

In 2025, ConocoPhillips Canada had approximately 1,195 active contracts, of which 93% were with Canadian suppliers and contractors. In total, approximately 99% of our annual spend on goods and services was with Canadian suppliers and contractors. The remaining suppliers and contracts, which include over \$11 million CAD in annual spend, are located in the United States of America, Norway, the United Kingdom, and France.



Governance, Policies and Standards

Governance

ConocoPhillips has a comprehensive governance framework that integrates sustainability risks and trends, including modern slavery risks, into our business strategy and decision making processes. We use a combination of strategic planning processes and risk management tools, underpinned by our approach to continuous improvement and internal assurance. These incorporate input from ConocoPhillips' Public Policy and Sustainability Committee, Executive Leadership Team, senior management and internal subject matter experts.

The ConocoPhillips board of directors oversees our strategic planning and risk management programs, including those related to modern slavery, forced labour and child labour. The board allocates certain oversight functions to its five standing committees to provide expertise and effective supervision across the business.

Our executive leadership team is responsible for developing corporate strategy, including implementing sustainability efforts. Our Sustainable Development Leadership Team, which is comprised of global business unit presidents and functional department heads, is responsible for managing sustainability in their businesses and functions, including SD focus areas, goals, priorities, action plans and results.

Operations and leadership teams within our business units and across functions are responsible for integrating sustainability into their day-to-day operations, project development and decision making. To support consistency across our global operations, subject matter experts

Governance framework

Feedback and communication at all levels of the chain is an important feature of our governance structure.



Note: Each layer represents a governance level and the corresponding membership entity/support.



collaborate in issues working groups focused on a range of sustainability issues, including modern slavery. They meet quarterly to discuss risks, risk mitigation challenges and best practices.

Policies and Standards

We have established several policies and statements outlining our principles and requirements for suppliers, ensuring alignment with our ethical standards and operational expectations. Our [Human Rights Position](#) is informed by internationally recognized standards such as the:

- Universal Declaration of Human Rights (UDHR);
- United Nations Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work;
- Voluntary Principles on Security and Human Rights (VPSHR);
- ILO Convention 169 on Indigenous and Tribal Peoples; and
- United Nations Declaration on the Rights of Indigenous Peoples.

The [ConocoPhillips Code of Business Ethics and Conduct](#) (Code) applies to all employees, suppliers, contractors, and business partners, and includes a commitment to respect human rights in accordance with the UDHR and the ILO Declaration on Fundamental Principles and Rights at Work. To instill these principles company-wide, all new employees undergo training on the Code, while existing employees attest to their understanding and compliance annually. Suppliers are obligated to comply with the expectations of our Code, as communicated in our contract agreements, in addition to upholding their own codes of conduct.

Furthermore, the [ConocoPhillips Supplier Expectations](#) (Supplier Expectations) set out specific requirements regarding ethical conduct, including the prohibition of child or forced labour, slavery and human trafficking.

Our Supply Chain Standard establishes controls and process governance for our supply chain functions and promotes compliance with various company requirements, such as policies, ethics codes, and internal procedures.

Employees and contractors at ConocoPhillips who are responsible for procuring materials and services are expected to adhere to our [Supply Chain Policy](#). This policy emphasizes the integration of safety, quality, environmental and social responsibility considerations into the selection and management of suppliers.

Our human rights position, and associated policies and implementation, are communicated internally and externally. Our business units and functions collaborate on human rights due diligence processes and share best practices through working groups and our Networks of Excellence.

Corporate functional documents are reviewed, at a minimum, every five years, and our Code and Supplier Expectations were most recently reviewed and updated in 2022. No updates have been made to policies related to modern slavery in 2025.



Risk Assessment

Since 2024, ConocoPhillips Canada has engaged an independent firm to apply a risk analysis tool to its direct suppliers that considers geographic, industry, and product or service risks. The tool utilizes annually updated information from international organizations that are reputable, publicly available and annually updated, in line with the approaches that our affiliated businesses in [Norway](#) and [Australia](#) use to comply with similar legislation. This risk analysis has been updated for 2025.

Sector Risks

While not specific to our operations, there are general risks of forced or child labour within specific industries from which ConocoPhillips Canada sources its goods. These industries and associated risks include the following:

- The **construction industry**, including construction services and materials. Construction materials such as aggregates have been linked to forced and child labour in upstream supply chains, while construction services have been more directly linked to labour and human rights concerns including unsafe working conditions, low-wages, and health and safety risks. The construction industry in Canada relies on migrant and temporary labour under the Temporary Foreign Worker Programme which has been linked to reports of exploitation and discrimination.
- The **maintenance, repair, and operations industry**, including cleaning and janitorial services, health and safety services, and other goods and services related to facilities, equipment, and operational infrastructure. Roles within this industry may be hazardous with low barriers to entry and sub-contracted staffing practices, leading to a reliance on temporary or migrant workers at greater risk of exploitation.
- The **oil and gas industry**, including the exploration and development of oil fields and associated drilling services, and the production and supply of **petrochemical products** used in production and operations. These products have occupational health and safety risks in their production, handling, and transportation. The risks of modern slavery in this industry are low, but drilling services may rely on vulnerable migrant and low-skilled workers, at risk of exploitation due to weak legal protections, language barriers, underpayment, or excessive working hours.
- The **manufacturing industry**, including operational equipment purchases and rentals, has potential risks of forced labour in lower-cost manufacturing regions with weak legal protection, where workers may be exposed to hazardous or unsafe conditions, involuntary overtime, or illegal recruitment fees. Additionally, the raw materials used in operational equipment, such as steel or aluminium, have been linked to forced labour and are subject to increased scrutiny under import regulations in the US and EU.
- The **hospitality industry**, including hotel accommodations and lodging, has moderate risks of modern slavery as it relies on temporary migrant workers, including students or young workers and women, who are more vulnerable to exploitation. This may include trafficking, illegal recruitment fees or contracting practices, wage theft, unsafe living conditions, and retention of identity documents.



ConocoPhillips Canada actively mitigates these risks through the due diligence measures and risk management processes outlined in this Report.

Geographic Risks

Based on the results of our 2025 risk assessment, ConocoPhillips Canada considers the risk of modern slavery in our operations and supply chains to be low. Direct suppliers are located in Canada, the United States, Norway, the United Kingdom, and France.

All five of these countries are considered low or very low risk across several modern slavery indicators, including prevalence of child labour, average working hours, human trafficking, and respect for fundamental rights.

Risk Management and Due Diligence

Our Operations

Our Sustainable Development (SD) Risk Management Standard establishes the process for the assessment and management of risks, including human rights risks across assets and projects, ensuring corporate oversight and consistent implementation. Risk assessments are conducted at least annually by each business unit and consider the physical, social and political context of our operations. Significant or high risks are documented in the corporate SD Risk Register, which is reviewed annually alongside associated action plans, and regular audits are conducted in each business unit.

Our stakeholder identification process is a key component of our overall social risk assessment process, including the identification of modern slavery risks. Each business unit is responsible for identifying stakeholders to understand their perspectives and concerns. Through our ongoing relationships with stakeholders, we identify important issues, as well as potential opportunities for collaboration. We then develop an engagement plan to address concerns and foster mutually beneficial relationships. By having open dialogue, we are able to identify and address potential impacts associated with our operations.

Consistent with our stakeholder engagement approach, if our operations identify potential human rights concerns, engagement plans and specific actions to manage and mitigate that risk are developed through engagement with the community or other stakeholders. Business units communicate and engage with communities and their representatives about how to contact the company and address any concerns or grievances.

Across our organization, we also drive collective action to address security and human rights issues, including potential child or forced labour, through engagement with governments, nongovernmental organizations (NGO) and other stakeholders, in line with the Voluntary Principles on Security and Human Rights (VPSHR). We have been a member of the VPSHR initiative since its inception in 2000. Our social performance guidance directs our VPSHR implementation and our [annual VPSHR report](#) details our current practices and provides updates for previous years.



Our Supply Chains

We routinely engage with our suppliers through business reviews and supplier audits. These processes aim to identify sustainable development opportunities and potential risks across critical categories. Suppliers are required to abide by ConocoPhillips' standards, including our Supplier Expectations and Code of Business Ethics and Conduct. As part of the onboarding process, the supplier registration questionnaire for new suppliers asks suppliers to confirm that they follow all applicable legislation regarding human rights and anti-slavery in the countries in which they operate.

Moreover, our contract terms require contractors, suppliers and service providers to adhere to all applicable laws (including, specifically, those relating to human trafficking or modern slavery) and conduct their activities for ConocoPhillips in a manner consistent with our Code of Business Ethics and Conduct.

To further strengthen our due diligence efforts in 2025, we implemented a new third-party risk screening and monitoring tool. The purpose of this tool is to establish a baseline understanding of social and human rights risks related to our critical suppliers. This will improve the assessments of suppliers during the bidding process, and ensure in-depth due diligence during the onboarding process. Additionally, it will increase transparency across supply chains, enabling the identification of potential human rights risks, which include modern slavery.

In addition to the other measures outlined throughout this Report, we communicate with our suppliers regarding our expectations. These communications serve to remind suppliers of their responsibility to prevent and mitigate risks of forced labour and child labour, directly or indirectly, in the provision of their goods or services to ConocoPhillips Canada.

Grievance Management and Remediation

ConocoPhillips provides all stakeholders with access to our 24-hour [Ethics Helpline](#), where they may anonymously report any suspected violations of our Code of Business Ethics and Conduct. The Global Compliance and Ethics function manages inquiries and concerns from employees and stakeholders. The team responds to these submissions and investigates alleged violations of the Code of Business Ethics and Conduct, implementing remedial and disciplinary actions as necessary.

We expect suppliers to adhere to the standards outlined in our Code of Business Ethics and Conduct and Supplier Expectations and any violation (including in respect of modern slavery issues) may lead to termination of the supplier's agreement.

In 2025, we did not receive any complaints or grievances regarding child labour or forced labour, nor did we identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. ConocoPhillips Canada will continue to assess our activities across our operations and supply chains and consider appropriate remediation efforts should forced or child labour risks arise.



Training

All new employees undergo training on the ConocoPhillips Code of Business Ethics and Conduct, including a module on Human Rights. Current employees are periodically required to repeat training. All active employees are required to complete the annual attestation to our Code of Business Ethics and Conduct.

In 2024, our Supply Chain Team worked with a third party to develop and deliver training materials for employees on forced labour and child labour. This training covers the definition, impacts and signs of modern slavery, sector- and company-specific risks, and ConocoPhillips' response and expectations of employees. The training also includes presentations and communications on our Human Rights position, which were distributed via email and displayed on internal communication screens across company locations.

This training was expanded in 2025 to our Human Resources team. The training will continue to be expanded to other teams in 2026.

In addition, ConocoPhillips continues to engage with industry organizations, including IPIECA, to support knowledge sharing and continuous improvement on human rights and modern slavery. Through participation in working groups and peer discussions, we collaborate with industry peers to improve training efforts.

Assessing Effectiveness

ConocoPhillips Canada currently assesses the effectiveness of our efforts to prevent and mitigate forced and child labour risks through our SD Risk Management Standard and through reporting our sustainability performance using internationally recognized reporting standards.

Under the Standard, human rights risks, including those related to forced and child labour, are systematically reviewed and reassessed on an annual basis. In addition, business units are required to develop and submit mitigation action plans for any SD risks ranked as significant or high, ensuring ongoing oversight and continuous improvement in addressing these issues.

We also report our sustainability performance using internationally recognized reporting standards. Our reporting is guided by the industry standards set out by IPIECA, the International Financial Reporting Foundation, and the Global Reporting Initiative (GRI), specifically GRI 408: Child Labour and GRI 409: Forced or Compulsory Labour.

As part of our continuous improvement efforts, we worked with a third party to conduct a gap analysis of our reporting requirements and due diligence processes related to modern slavery, including forced and child labour. We will assess the recommendations of the gap analysis in 2026.



Future Commitments

We strive to continuously improve our processes for identifying, mitigating and remediating modern slavery risks throughout our operations.

In 2026, we intend to:

- Roll out our training on child and forced labour to the Health, Safety and Environment (HSE) and additional teams;
- Integrate child and forced labour indicators into our quality assurance and control questionnaires;
- Explore alternative solutions to further strengthen our supply chain understanding and risk mapping capabilities; and
- Continue participation in related industry associations' knowledge shares, including IPECA.

Consultation and Requesting Information

ConocoPhillips Canada consulted with the reporting entities on the development of this Report.

Requests for both general information and specific details related to our operations, supply chain, or business practices can be made through the following channels:

For our **on-line portal**, click here: [Contact Us](#).

Stakeholders can also contact us via:

- Phone: 403 233 4000
- Location: ConocoPhillips Canada Headquarters, Calgary, Alberta

Approval and Attestation

This Report was approved under paragraphs 11(4)(b)(i) and 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Nick McKenna

As a member of the board of directors of ConocoPhillips Canada Resources Corp., which is also the managing partner of ConocoPhillips Surmont Partnership and ConocoPhillips (BRC) Partnership; and as a member of the board of directors of Conoco Funding Company.



A handwritten signature in blue ink, appearing to read 'Kelly B. Rose', with a long horizontal flourish extending to the right.

Kelly B. Rose

As a member of the board of directors of ConocoPhillips Company.