



Overview

On January 1, 2024, Canada enacted the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, commonly known as the *Modern Slavery Act* (“the Act”).

This report outlines the approach and initiatives of NARL Marketing Limited Partnership, NARL Marketing Inc. and North Atlantic Refining Corp. (collectively “North Atlantic”) to identify and address the risks of forced and child labour in its business operations and supply chains during the financial year commencing January 1, 2024 and ending December 31, 2024.

Business Structure, Activities and Supply Chains

North Atlantic is headquartered in St. John’s, NL and primarily operates as a reseller of gasoline, diesel and jet fuel within the province of Newfoundland and Labrador.

North Atlantic’s supply chain includes a network of direct suppliers domiciled in Canada and the United States that provide goods and services that support us in carrying out our operations. Our suppliers provide a range of goods and services, such as IT and communications equipment, office supplies, consulting and advisory services, financial transaction services and bulk fuels. Our operations and workforce, comprised mostly of office staff, are based in Newfoundland and Labrador.

Policies & Due Diligence Processes

North Atlantic’s commitment to ethical business practices (including labour and human rights) is outlined in its Code of Business Conduct and Ethics (“the Code”). This Code applies to all employees and mandates adherence to all laws, rules and regulations applicable to the cities, provinces and countries in which we operate. Whistleblower reporting mechanisms are in place for any violation of laws, rules, regulations or the Code.

North Atlantic seeks to identify and do business with suppliers that have standards aligned with ours. We also expect that our suppliers adhere to all applicable laws, rules and regulations while doing business with us.

All procurement activities we undertake are fair, ethical and maintain our corporate integrity and reputation. We expect our suppliers to apply standards, processes and principles that are equivalent to our own and to treat their employees in a manner consistent with respect for human rights and applicable labour/employment laws. Each of our suppliers has its own supply chain and we expect compliance throughout all supply chain levels.

North Atlantic proactively takes steps to identify, prevent and reduce the risk of forced labour or child labour in our business operations and supply chains. These steps include:

- Ongoing review and consideration of the latest governmental advice and guidance;
- Ongoing review of our internal policies, procedures, business systems and processes;
- Mapping of our business activities and supply chains;
- Ongoing screening of current and potential suppliers; and
- Continuing to engage in labour and employment practices that comply with all applicable federal and provincial laws.

Risk Assessment

Our employees and operations are based in Canada. Our direct suppliers are based in Canada and/or the United States. Both countries have robust legal and regulatory frameworks that guard against the risks of forced and/or child labour. The nature of our business operations dictates that the majority of our workforce is comprised of skilled and experienced individuals. As a result, we have assessed the risk of forced labour and/or child labour in our business activities and direct supply chains as low.

Remediation Measures

Based on a preliminary assessment of our business activities and supply chains, North Atlantic did not identify any instances of forced and/or child labour. As a result, remediation measures were not required.

Training

North Atlantic insists on strict adherence to our Code of Business Conduct and Ethics. New employees are introduced to the Code during orientation and are required to acknowledge in writing their commitment to strict compliance.

All employees are periodically made aware of the importance of the Code and the whistleblower reporting mechanisms embedded within it. In 2024, efforts were made during employee orientation and other employee training to highlight issues related to child and forced labour, compliance with human rights legislation and supply chain due diligence processes.

Assessment of Effectiveness

As a means of assessing our effectiveness in ensuring that our business activities and supply chains remain free of forced and/or child labour, North Atlantic will:

- Regularly review (and update as necessary) our internal policies and procedures, business systems and processes;
- Continue to insist that our suppliers adhere to all applicable laws, rules and regulations while doing business with us;
- Continue to map our activities and supply chains and monitor our suppliers to identify any risks of forced and/or child labour.

Approval & Attestation

This report was approved pursuant to s.11(4)(b)(ii) of the *Act* by the Board of Directors of North Atlantic Refining Corp.

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 the 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 year listed above.



Ted Lomond
President & CEO
May 30, 2025

I have the authority to bind North Atlantic.