



FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

2025 REPORT

1. INTRODUCTION

This report (the “Report”), in respect of the financial year ended March 31, 2025, is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)* (the “Act”) has been prepared jointly by AECO Gas Storage Partnership (“AECO”), Access Gas Services Inc. (“AGS”) and Access Gas Services (Ontario) Inc. (“AGS ON”). In this Report, AECO, AGS and AGS ON are collectively referred to as “Reporting Entities” and references to “we”, “us” or “our” are to the Reporting Entities. The Business Numbers of each Reporting Entity is as follows:

- AECO Gas Storage Partnership BN: 82104 8949
- Access Gas Services Inc. BN: 83888 6521
- Access Gas Services (Ontario) Inc. BN: 84542 1494

We are committed to working in a responsible manner, one that prioritizes the well-being and protection of our workers, the public, and the environment. We operate our facilities in a manner that respects the health and safety of our employees, contractors, customers, communities, and the environment in which we operate. We believe that the health, safety, and wellbeing of our employees, contractors, customers, and the public are the highest priority. It is our goal and objective to operate our business in such a way as to prevent harm to people and to protect the environment. We comply with all applicable health, safety, human rights and environmental laws and regulations.

2. OUR COMMITMENT

We are committed to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights, including but not limited to:

- a. operating with leading health and safety practices to support the goal of zero serious safety incidents;
- b. Striving to ensure that the interests, safety and well-being of the communities in which we operate are integrated into our business decisions;
- c. the elimination of discrimination in employment;
- d. the prohibition of child and forced labour; and
- e. the eradication of harassment and physical or mental abuse in the workplace.

We strive to embed these standards into all of our core business activities, including training, communications, contracts and due diligence processes as appropriate. These practices extend to our interactions with our key suppliers and other business partners.

3. OUR BUSINESS

AECO is headquartered in Calgary, Alberta. In Alberta, AECO owns and operates the AECO Hub™, comprised of the Suffield and Countess gas storage facilities.

AECO provides natural gas storage services as well as actively buys and sells natural gas throughout Canada.

AECO is the parent company of both AGS and AGS ON which provide natural gas supply and related services to customers throughout Canada.

We have centralized corporate and administrative functions that provide governance, financing, procurement, and other support to the business of the Reporting Entities covered by this Report.

4. OUR SUPPLY CHAIN

The supply chain and procurement team is a centralized function that supports our operations across Canada. Our supply chain includes various vendors, suppliers, contractors, and subcontractors (the “Service Providers”) involved in the procurement of goods and services necessary for our operations in developing and maintaining our assets and the services we provide. In total, we procure goods and services from approximately 225 Service Providers.

The most common products at our facilities are industrial hardware for oil and gas facilities, which are typically sourced from North America. The only good which we sell is natural gas, which has been developed in Canada.

We employ the services of Complyworks, a third-party vendor used to manage various risks and compliance requirements within our supply chain to ensure we contract only with Service Providers who meet our qualification standards and corporate requirements. Complyworks will screen a third-party vendor upon onboarding, but also conduct periodic compliance assessments with our policies and procedures. If a third-party vendor is non-compliant, that “red flag” is brought forward to the Legal Department to assess.

5. OUR POLICIES AND DUE DILLIGENCE

All of our Service Providers and their affiliates are required to adhere to our comprehensive corporate policies in providing goods and services to all of our subsidiaries and affiliates including the Reporting Entities. Each corporate policy of the Reporting Entities is posted on our external website for all of our Service Providers to access. Failure to adhere to our policies may result in the Service Provider’s services being terminated. Our Code of Business Conduct and Ethics Policy addresses Human Rights and Modern Slavery and our commitment to conducting business in an ethical and responsible manner. Our policies are reviewed annually to ensure continued measures are in place to mitigate such risks and that any forms of forced labour or child labour are addressed. We are committed to continuously evolving and improving our policies and practices and strive to make every effort to prevent our activities from having a negative impact on human rights.

We expect all of our Service Providers to adhere to business principles and values similar to our own and to comply with all laws, regulations and best practices. Before making any commitments towards third parties, Complyworks assists us by evaluating the relationship and mitigating any associated risks by carrying out risk-based due diligence and checks to identify high risk suppliers in various areas, including forced labour, child labour or other human rights violations.

Our standard form service agreements with Service Providers now include various representations, obligations and indemnities in relation to forced labour and child labour. Service Providers must represent that they and their subcontractors do not use any forced or child labour in their procurement processes. Any breach of these obligations is deemed a material breach and entitles us to terminate the Services Provider’s agreement immediately.

6. ASSESSING OUR RISK

In assessing the risk of forced and child labour in our business and supply chains, we rely heavily on Complyworks, an external risk management and compliance service provider who utilizes a variety of metrics and questionnaires to assess our risk within the procurement process. We acknowledge that our exposure to the risk of forced labour and/or child labour increases when we engage with third parties in high-risk countries or categories such as protective equipment and garment production. When a Service Provider falls into either of these categories (being located in a high-risk country, or providing products such as garments or personal protective equipment), we exercise a higher level of diligence and will seek alternative products or Service Providers and to the extent possible we attempt to source locally produced products.

7. REMEDIATION MEASURES

We continually assess our operations and Service Providers with respect to any incidences of forced labor or child labor within our supply chain. To date, we have not yet identified any concerns. Therefore, we have not taken any measures to remediate any forced or child labour incidents or any loss of income to the most vulnerable families that results from any measures taken to eliminate such incidents. We acknowledge the importance of ongoing monitoring to ensure that risks surrounding forced and child labour remain mitigated within our operations and supply chains. We are committed to regularly reviewing policies and implementing any necessary remediation measures should the need arise in the future. Our Code of Business Conduct and Ethics and our Whistleblower Policy require all our employees and contract workers to report actual or suspected misconduct in all areas.

Our processes establish that if we do identify an incidence of forced or child labour, we will immediately stop the work (to the extent safe to do so), engage the Legal Department to investigate and terminate the Service Provider where appropriate. We will then identify how the incident occurred and take corrective steps to prevent future occurrences.

8. TRAINING

Our personnel at all levels are required to adhere to all corporate policies as well as participate in an annual online training session in respect of our Code of Business Conduct and Ethics, as well as Anti Bribery and Corruption Program to ensure that it is understood and properly applied to their daily activities. Additionally, all employees are informed, encouraged and expected to report wrong-doing or suspicious activities under those policies.

This report itself is included in onboarding materials for new hires and is required reading.

9. EFFECTIVENESS

As part of our ongoing commitment to a safe and fair workplace, we monitor compliance with our policies on an ongoing basis and review any concern which might be brought to our attention by employees or Service Providers. To date no significant concerns or complaints relating to forced labour or child labour have been identified. We meet with the representatives of Complyworks on a regular basis to ensure that all measures are being taken by Complyworks on our behalf continue to meet our needs and the evolving risks of our operations.

10. APPROVAL & SIGNATURE

This Report has been approved by the board of directors of each Reporting Entity for the fiscal year ending March 31, 2025, in accordance with Section 11(4)(b)(i) of the Act.

It has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This report will be available on our internal website as well as our external website at www.rockpointgs.com.

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 Reporting 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.



*Tobias (Toby) J. McKenna

Authorized Signatory for:

AECO Gas Storage Partnership, Access Gas Services Inc., Access Gas Services (Ontario) Inc.

Dated: May 26, 2026.

**I have the legal authority to bind all Reporting Entities.*