



## **Fighting Against Forced Labour and Child Labour in Supply Chains Report (2024)**

### **ABOUT THIS REPORT**

Ovintiv Inc. (TSX & NYSE: OVV) has prepared this report ("Report") pursuant to section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ended December 31, 2024. This is a joint Report made on behalf of Ovintiv Inc. and the subsidiaries (the "Ovintiv Reporting Entities") identified in the table below (collectively, "Ovintiv", "Company", "we", "us" or "our").

<b>Ovintiv Reporting Entity</b>	<b>Principal Activity</b>
Ovintiv Inc.	Ultimate parent of the Ovintiv group of companies. Listed on the Toronto Stock Exchange and New York Stock Exchange
Ovintiv Canada ULC	Main operating entity in Canada and is an indirect wholly owned subsidiary of Ovintiv Inc.
11786865 Canada Ltd.	Top holding company for Ovintiv's Canadian subsidiaries and a wholly owned subsidiary of Ovintiv Inc.
Encana Leasehold Limited Partnership	Real estate holding company Partnership between Ovintiv Canada ULC and 1229577 Alberta Ltd.
Ovintiv USA Inc.	Main operating entity in U.S.A., which is an indirect wholly owned subsidiary of Ovintiv Inc.
Cutbank Ridge Partnership	Partnership between Ovintiv Canada ULC and Cutbank Dawson Gas Resources Ltd.

The information provided in this Report generally applies to all Ovintiv Reporting Entities except where otherwise indicated.

### **INTRODUCTION**

At Ovintiv, our products fuel the world — we make modern life possible. As one of the largest producers of oil, condensate, natural gas and natural gas liquids in North America, our team stands united by a commitment to drive progress and improve lives with respect and responsibility, not just in the communities where we operate, but for everyone.

We recognize the fundamental importance of human rights and the need for all of us to ensure these rights are upheld. Our respect for human rights is embodied in the ways we operate and conduct ourselves—always guided by our foundational values of safety, integrity, respect and trust. Our foundational values underpin our behaviour and define what we expect of ourselves and others in the workplace and beyond. They impact how we execute our strategy, deliver on our objectives and achieve our purpose of making modern life possible.

Ovintiv is committed to supporting the protection and preservation of human rights throughout our operations, including preventing forced labour, child labour and human rights abuses from occurring in our operations and supply chains. This commitment extends to all locations where we operate.



## **STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

### ***Organizational Structure***

Ovintiv is a leading North American oil and natural gas exploration and production company that is focused on developing its multi-basin portfolio of high-quality assets located in the United States and Canada. Ovintiv's operations also include the marketing of oil, NGLs and natural gas. As at December 31, 2024, all of the Company's reserves and production were located in North America.

Ovintiv's success is the direct result of a talented workforce and the Company's expectation to share ideas and work together to achieve company goals. As at December 31, 2024, Ovintiv employed 1,623 employees with 925 employees in the U.S. and 698 employees in Canada. In addition, the Company also engages a number of contractors and service providers.

Ovintiv Inc. is incorporated pursuant to the laws of Delaware and has its principal office located in Denver, Colorado. Ovintiv Canada ULC, which is the main operating entity in Canada, is incorporated pursuant to the laws of British Columbia and is principally located in Calgary, Alberta.

### ***Activities***

Ovintiv's operations are focused on the exploration and development of oil, NGLs and natural gas reserves. The Company is also focused on creating and capturing additional value through its market optimization activities. The Company conducts a substantial portion of its business through the Ovintiv Reporting Entities, among other subsidiaries. Ovintiv's operating and financially reportable segments are: (a) Canadian Operations; and (b) U.S. Operations.

During the year ended December 31, 2024, Ovintiv reassessed its reportable segments and reclassified its Market Optimization segment to present Ovintiv's market optimization in their respective Canadian and U.S. operating segments, which they support.

### **Canadian Operations**

Ovintiv's Canadian Operations includes the exploration for, development of, and production of oil, NGLs, natural gas and other related activities within Canada. Plays in Canada include Montney in northeast British Columbia and northwest Alberta and Horn River in northeast British Columbia.

In 2024, the Canadian Operations production averaged approximately 47.1 Mbbls/d of oil and NGLs and approximately 1,161 MMcf/d of natural gas.



### U.S. Operations

Ovintiv's U.S. Operations includes the exploration for, development of, and production of oil, NGLs, natural gas and other related activities within the United States. Plays in the U.S. include Permian in west Texas, Anadarko in west-central Oklahoma, and Uinta in northeastern Utah. On January 22, 2025, Ovintiv closed the divestiture of substantially all of its Uinta assets.

In 2024, the total production of the U.S. Operations averaged approximately 167.9 Mbbls/d of oil, approximately 87.0 Mbbls/d of NGLs and approximately 537 MMcf/d of natural gas.

### **Our Supply Chains**

Ovintiv operates in Canada and the U.S. and as such most of Ovintiv's suppliers are also based in these countries. In 2024, Ovintiv made payments to over 3,300 suppliers. Fewer than 1% of these suppliers are based outside of Canada or the U.S.

According to the Global Slavery Index 2024, 100% of Ovintiv's direct suppliers are based in low-risk countries. Some of our suppliers may procure goods from outside of Canada or the U.S. and we have launched initiatives to understand and identify our indirect exposure to other countries that make up our indirect supply chain.

Using our Risk Protocol Matrix and Questionnaire (described further below) Ovintiv is continuing to further develop its understanding and assessment of the modern slavery risks across the geographical locations and industries within its supply chains.

### **POLICIES**

From an operational perspective, we are committed to cultivating the support of our employees, contractors, service providers and suppliers for our high standards regarding human rights. Respect for human rights is defined in our *Human Rights Policy* and is further reflected in the Code and *Supplier Code of Conduct* (the "Supplier Code"), as well as how we interact with each other and our stakeholders. Our codes and policies apply to our Board, employees, contractors, service providers and suppliers. In addition, our Service Provider EH&S Expectations Manual aligns with our Supplier Code and sets forth our expectations from a business perspective and on important social issues such as human rights.

### **Business Code of Conduct**

Ovintiv understands that to excel in executing our strategy and achieving our vision of "making modern life possible," we must strive to share, uphold and embody ethical and business principles that clearly set out how we do business, engage with each other and the community. Despite our differences—in geography, culture, language and business—we are united by the common principles in the Code and a shared commitment to the highest standards of conduct.

We are committed to complying with and upholding all laws, rules and regulations which apply to our business in the countries in which we operate, including the requirements of applicable labour laws, human rights and regulatory authorities.

The Code applies to our Board, employees and contractors. Each of us has a responsibility to know the Code and always abide by it. Our leaders are expected to lead by example and reflect what it means to "live by



the Code.” A violation of the Code or related policies and practices will result in disciplinary action as appropriate, up to and including termination of employment or contract.

#### [Supplier Code of Conduct](#)

Ovintiv is committed to operating its business ethically and in compliance with all laws and regulations. We expect all of our business suppliers, vendors, contractors, and service providers, including their staff, agents and sub-contractors (collectively, “Suppliers”), to protect, respect, and support human rights measures and comply with all relevant human rights laws, labour laws and regulations. Suppliers are expected to take all reasonable steps to comply with all legal and statutory requirements with respect to their workers.

In 2023, Ovintiv updated its Supplier Code to include a more directed response to child and forced labour to expressly and specifically prohibit the use or tolerance of forced, coerced or child labour. Suppliers are responsible for staying up to date on Ovintiv’s expectations in addition to any legal and regulatory requirements for proper compliance and governance. Failure to comply with the Supplier Code can impact a Supplier’s ability to continue working with Ovintiv.

#### [Human Rights](#)

Ovintiv’s commitment to human rights is guided by international and national standards, including:

- UN Guiding Principles on Business and Human Rights;
- UN Universal Declaration of Human Rights;
- International Labor Organization’s Declaration of Fundamental Principles and Rights at Work; and
- All applicable federal, state and provincial laws and regulations, including the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Accordingly, at Ovintiv we, among other things:

- Prohibit all forms of slavery, compulsory and forced labor, human trafficking, and child labour;
- Understand the important role our industry can play in identifying and preventing human trafficking through increased employee awareness and working with our suppliers to engage in programs to prevent human trafficking;
- Will not be complicit in human rights abuses or violations of human rights laws; and
- Will perform human rights assessments as required within our operations.

Anyone who violates our policies and practices, including the Supplier Code, can be subject to disciplinary action up to and including termination of employment, contract or supplier contract.

#### [Integrity Hotline](#)

Every employee or individual working with us has a duty to report suspected or actual wrongdoing that is illegal or in violation of the Code. We have several resources available for guidance regarding how to report a concern such as: management personnel, Human Resources personnel, our ethics and compliance team, and our Integrity Hotline. In addition, stakeholders are encouraged to report concerns to legal or regulatory bodies. We do not tolerate any form of retaliation including threats, discrimination or discipline against anyone who reports a concern in good faith or participates in an investigation.



Our Integrity Hotline is managed by an independent third party and allows for anonymous reporting of potential violations of the Code. Our Ethics and Compliance team follows up to conduct investigations for appropriate resolution. Management regularly reports hotline activities and compliance investigations to our Audit Committee. Specific concerns are also reported to relevant committees, and the full Board is made aware of material items or investigations.

## **DUE DILIGENCE**

### ***Overview of Ovintiv's Management of Supply Chain Risk***

Ovintiv engages in various activities to identify, assess, and manage supply chain risk. We take an integrated multi-basin approach to supply chain management. Our Supply Management team is woven into all levels of our organization, from our corporate offices to our field operations. We all have a responsibility to uphold human rights – and we act accordingly. We work hard to build transparent, long-term relationships with our suppliers. We want to know who we are working with and how they run their organization. This can often mean being on the ground in the field and touring their shops. Our suppliers must maintain integrity, transparency, and compliance in all that they do.

In the face of supply chain disruptions, increasing geo-political and compliance risks across the world, our Supply Management team has embraced our value of agility by proactively identifying and mitigating risks to, and in, our supply chain. This includes engaging with key suppliers annually to capture their insights about current and potential risks and disruptions to Ovintiv's supply chain as well as gathering and integrating known trade barriers into our analysis and decision-making.

Ovintiv's Supply Chain Management team is committed to furthering social and governance progress. We have developed an internal methodology to integrate social considerations into our sourcing selection process. We conducted a supply chain risk assessment that allowed us to map our Global Supply Chain and develop a Risk Protocol Matrix. The matrix provides a high-level snapshot of the location of our main suppliers and products. This enables us to continually identify and mitigate potential risks as well as supply disruptions, decreasing exposure for both Ovintiv and our suppliers to the ever-changing global supply chain.

As part of our initial onboarding process for new vendors and annual review process thereafter, counterparties are expected to complete a questionnaire which includes human rights questions to assist with our due diligence and risk assessment. Service providers and suppliers identified as having a higher operational risk are then subject to additional screening or audits via our risk management software (described below).

Finally, Ovintiv's Ethos operations management system performs audits on service providers and suppliers identified as having a higher operational risk, which can include potential human rights issues such as forced labour. Ethos is a structured and documented set of interdependent standards, practices, processes, and procedures used at every level in the company to manage operational risks and clearly state how we conduct our business.

## **POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAIN**

In 2024, our risk assessment steps included, but were not limited to:

- Consideration of the latest governmental advice and guidance;



- A review of our risk management infrastructure including, but not limited to, applicable governance bodies, policies, procedures and legal obligations; and
- A review of our Global Supply Chain Dashboard and Risk Matrix Protocol.

### ***Potential Risks in Our Operations***

Ovintiv considers the risk of child and forced labour occurring within the operations of the Ovintiv Reporting Entities to be low in light of our workforce and human resources policies and procedures. Our employees operate in Canada and the U.S. only, which have a low prevalence of modern slavery, a low risk of vulnerability to modern slavery and fairly robust governmental response to modern slavery.<sup>11</sup> Moreover, our workforce largely consists of skilled, qualified, and experienced individuals.

Ovintiv also has a number of internal controls designed to safeguard the rights of our employees. These include our internal policies and practices, including our recruitment, employee engagement and remuneration practices, our Integrity Hotline, and our commitment to respecting and observing all human rights, in accordance with applicable law and the principles set forth in applicable international standards.

### ***Potential Risks in Our Supply Chains***

Ovintiv recognizes that particular regions, products and raw materials can carry a higher risk of child and forced labour because of the prevalence of child and forced labour in particular countries. There are also risks linked to certain industries even in countries considered to have lower risks of child and forced labour. We recognize that a small percentage of our suppliers likely rely on extensive global supply chains for the goods provided to us which makes it particularly challenging for us to have direct and meaningful visibility across our supply chain beyond the first tier. Accordingly, potential risks of child and forced labour may exist as part of our suppliers' global supply chains.

### ***Management and Mitigation of Potential Risks***

To manage these risks on an ongoing basis we have implemented vendor risk management software that delivers a robust solution for ongoing vendor monitoring and third-party risk management with screening and continuous vendor monitoring.

In addition, our standard contract templates include a provision to ensure that there is a contractual obligation on all of our counterparties to comply with the above-noted policies and codes of conduct as well as generally applicable laws such as the Act.

Based on Ovintiv's knowledge of its operations and supply chain regarding the risk of forced labour or child labour being used, we are not aware of any instances of child or forced labour. Accordingly, no steps were required to remediate child or forced labour or the loss of income associated with remediation efforts.

### **TRAINING**

Annually, Ovintiv employees formally commit to following the Code, acknowledging their understanding of and compliance with key policies. We also provide regular, mandatory code and compliance training at all levels of our organization, including a section on forced labour and human trafficking.

We are proud that 100% of Ovintiv employees committed or recommitted to following the Code in 2024.

<sup>11</sup> Walk Free, Global Slavery Index 2024, found [here: https://www.walkfree.org/global-slavery-index/map/](https://www.walkfree.org/global-slavery-index/map/) 1391-6027-8548.2



### **MEASURING EFFECTIVENESS**

As we continue to grow in a complex and ever-changing environment, we will all encounter difficult situations where the path forward may not be as clear. The Code and related policies and practices assist us in navigating in the right direction as we make ethical decisions on behalf of our company and take accountability for maintaining integrity, transparency and compliance in every aspect of our work. We will continue to learn and adjust our approach where necessary.

In 2025, we will continue to track the number of employees that commit or recommit to our Code. We also periodically review our policies and procedures to continue to evaluate their appropriateness in light of any identified risks.

### **APPROVAL & ATTESTATION**

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Ovintiv Inc. on behalf of itself and each of the Ovintiv Reporting Entities.

A handwritten signature in black ink, appearing to read "Brendan M. McCracken", written over a horizontal line.

Brendan M. McCracken  
President & Chief Executive Officer and a Director, Ovintiv Inc.  
May 6, 2025

I have the authority to bind Ovintiv Inc. and the Ovintiv Reporting Entities