



INPLAY OIL

2023 InPlay Oil Corp. Modern Slavery Report

Introduction:

InPlay Oil Corp. ("InPlay", the "Company", "we", or "our") has prepared this report in compliance with the requirements pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Modern Slavery Act").

Forced labour and child labour (each as defined in the Modern Slavery Act and hereinafter together referred to as "**modern slavery**") are violations of fundamental human rights and are occurring across the globe. As a Canadian company, we recognize the responsibility that we have to ensure our operations and the supply chains that support our operations adhere to the highest ethical standards, which includes the identification and prevention of modern slavery from occurring in our operations and supply chains.

InPlay is a reporting entity as defined in the Modern Slavery Act. This report covers InPlay's activities during our previous financial year, from January 1, 2023 to December 31, 2023.

InPlay takes modern slavery and our reporting requirements very seriously and we are committed to ensuring that we adhere to such requirements. We will continue to evaluate and assess our processes with respect to modern slavery in our business over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

Reporting:

The following paragraphs summarize the annual reporting requirements of the Modern Slavery Act and InPlay's response to each item for the financial year ended December 31, 2023.

Section 11(1) – Steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity

InPlay first became aware of the Modern Slavery Act in early 2024 after it came into force and subsequently engaged our legal counsel to assist in navigating the new reporting regime. InPlay intends to continue to evaluate our reporting processes, ensure that our reporting with respect to modern slavery meets the statutory requirements and assess our policies, due diligence activities and overall business regarding the identification and prevention of modern slavery in our operations and supply chain.

InPlay is committed to conducting business to the highest standards of ethical business practice and conduct. The Company strives to ensure that forced labour and child labour are not taking place in our supply chains and operations, including through recruitment and employment practices. We do not knowingly engage in forced labour or child labour or partner with any supplier who does.

InPlay has implemented effective policies and procedures to prevent and reduce the risk of forced labour or child labour in our operations or supply chain including: Code of Business Conduct and Ethics, Whistle Blowing Procedure, Corporate Governance and EHS&S Committee Mandate and Terms of Reference,

Compensation Committee Mandate and Terms of Reference, Recruitment Procedure and Supplier Due Diligence Procedure.

Section 11(3)(a) – Entity structure, activities and supply chain

InPlay is a publicly traded junior oil and gas exploration and production company with operations in West Central Alberta. InPlay produces light crude oil and natural gas focusing on our concentrated light oil assets targeting the Cardium Formation within the well-defined Pembina and Willesden Green pools, and the high oil-weighted Belly River Formation. The produced commodities are then sold within Canada to various oil and gas marketing companies .

InPlay has approximately 35 employees and approximately 40 contractors. We do business with a wide range of suppliers that provide goods and services required for our operations. We strive to build relationships with suppliers that operate legally, ethically and responsibly. InPlay’s number one priority is the safety of our employees, contractors and communities within our operating areas. In 2023, the majority of goods and services procured by InPlay were sourced from Canada.

InPlay holds interests in assets that are not operated by the Company. Statements regarding our operations only relate to operated assets and data for non-operated assets is not presented in this Report.

Additional information regarding the corporate structure and operations of InPlay can be found in our 2023 Annual Information Form, which is available on SEDAR+ (www.sedarplus.com).

Section 11(3)(b) – Policies and due diligence processes in place related to forced labour and/or child labour

This section addresses InPlay's policies and due diligence processes in relation to modern slavery.

Policies

InPlay has several policies in place that reflect our values and set clear expectations for our directors, officers, employees, suppliers, contractors, consultants, business partners, and other service providers with whom we engage. We do not tolerate any form of modern slavery in any part of our business, including in our supply chains. Below, we have provided an overview of the relevant policies that we currently have in place in relation to modern slavery that guide our commitment to conduct business activities in an ethical, legal and responsible manner:

| Policy | Overview |
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| <i>Code of Business Conduct and Ethics</i> | <p>The <i>Code of Business Conduct & Ethics</i> (the “Code”) establishes specific standards of ethical business practice and conduct expected of all directors, officers, employees, consultants, contractors, contract operators and any other person or company that provides services to InPlay (collectively, the “Service Providers”). The Code further outlines the following:</p> <p>Fair Dealing: Each Service Provider should endeavour to deal fairly with the Company’s customers, suppliers, competitors and Service Providers. No Service Provider should take unfair advantage of anyone through illegal conduct, manipulation,</p> |

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| | <p>concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. No Service Provider will be permitted to achieve results through violations of laws or regulations, or through unethical dealings.</p> <p>Compliance with Laws, Rules and Regulations: Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is critical to our reputation and continued success. All Service Providers must respect and obey the laws of the cities, provinces and countries in which we operate and avoid even the appearance of impropriety.</p> <p>Reporting of any Illegal or Unethical Behaviour: We have a strong commitment to conduct our business in a lawful and ethical manner. Service Providers are encouraged to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation and to report violations of laws, rules, regulations or this Code. We prohibit retaliatory action against any Service Provider who, in good faith, reports a possible violation.</p> |
| <i>Whistle Blowing Procedures</i> | <p>InPlay's Whistleblower Policy provides a mechanism through which Service Providers and other stakeholders can anonymously submit complaints relating to the Company's operations. It is the responsibility of the Audit Committee to ensure that the Company has established appropriate procedures for the receipt, retention and treatment of complaints received through the Whistleblower Policy. The Whistleblower Policy can be accessed by Service Providers and other stakeholders through the Company's website.</p> |
| <i>Corporate Governance and EHS&S Committee Mandate and Terms of Reference</i> | <p>The Corporate Governance and EHS&S Committee oversees matters relating to environmental, health, safety and sustainability ("EHS&S") policies, practices and programs of InPlay. The <i>Corporate Governance and EHS&S Committee Mandate and Terms of Reference</i> outlines the following responsibilities of this committee:</p> <ul style="list-style-type: none"> • Establishing, reviewing and updating periodically a <i>Code of Business Conduct and Ethics</i> and ensure that management has established a system to monitor compliance with the Code. • Reviewing management's monitoring of the Code. • Monitor InPlay's business to assist InPlay in conducting its business in a socially responsible, ethical and transparent manner that includes engagement, respect and support for the communities in which InPlay works. • Review InPlay's compliance with all applicable laws, regulations and InPlay's policies with respect to health, safety and the environment. |
| <i>Compensation Committee Mandate and Terms of Reference</i> | <p>The Compensation Committee is responsible for the compensation and remuneration policy for employees of InPlay. The Company utilizes a fair and equitable compensation policy that adheres to Alberta's</p> |

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| | <i>Employment Standards Code.</i> |
| <i>Recruitment Procedures</i> | InPlay maintains recruitment procedures and employment practices to facilitate compliance with applicable employment, labor and human rights laws. InPlay performs reference checks on employee candidates to identify any previous instances of non-compliance with laws, rules and regulations. |

In addition to the above, we intend to regularly evaluate our approach with respect to modern slavery to ensure the effectiveness of our methodology, including amending existing policies and implementing new policies, as necessary, to prevent modern slavery from occurring in our business.

Due Diligence

InPlay expects our directors, officers, employees, suppliers, contractors, consultants, business partners, and other service providers with whom we engage, to adhere to ethical and lawful business practices.

To ensure we are not unknowingly engaged in business with any entities engaged in modern slavery, our supplier due diligence includes the following steps:

- Engaging with Canadian-based companies, which are subject to local laws including employment and labour laws, to the fullest extent possible;
- Collecting sufficiently detailed supplier information prior to engaging in business;
- Monitoring and evaluating supply chains and business relationships.

Subsequent to December 31, 2023, InPlay has engaged with a third party to implement a questionnaire for all vendors requiring a response from all vendors on their policies and processes relating to modern slavery and child labour.

Section 11(3)(c) – Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

Given our workforce is largely comprised of office workers and skilled oil and gas field workers and our assets are located in the province of Alberta, we consider that there is minimal risk of forced labour or child labour in our direct operations.

Given that the large majority of InPlay’s expenditures on goods and services is with suppliers located in Canada, we consider the overall risk of modern slavery being present with our direct suppliers to be low. However, we appreciate that many of our suppliers provide us with products that originate from other jurisdictions, and all have their own supply chains.

Section 11(3)(d) – Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?

InPlay has not identified any instances of modern slavery in our business and the supply chains that support our operations and as such, we have not taken any measures to remediate any forced labour or child labour or to remediate the loss of income to the most vulnerable families that resulted from any measure taken from any of InPlay's actions.

Section 11(3)(e) – Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

InPlay has not identified any instances of modern slavery in our business and the supply chains that support our operations and as such, we have not taken any measures to remediate any forced labour or child labour or to remediate the loss of income to the most vulnerable families that resulted from any measure taken from any of InPlay's actions.

Section 11(3)(f) – Does the organization currently provide training to employees on forced labour and/or child labour?

InPlay does not currently provide training to employees on forced labour and/or child labour. However, all employees are required to confirm they have read, acknowledge and understand the *Code of Business Conduct and Ethics* when they join the Company. This document is also available on InPlay's website and circulated to all employees annually. Officers and directors are required to make this acknowledgement on an annual basis.

Section 11(3)(g) – Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

InPlay has not yet implemented any policies or processes to assess our effectiveness in ensuring that modern slavery is not used in our business and our supply chains. However, InPlay encourages stakeholders to share concerns related to violations of the Code, policies or applicable laws via a confidential whistleblower system.

Attestation:

This report was approved by InPlay's Board of Directors on May 8, 2024 pursuant to paragraph 11(4)(a) of the Modern Slavery Act and has been filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the Modern Slavery Act, and in particular section 11(4)(a) thereof, I attest that I have reviewed the information contained in the report for the entity 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 Modern Slavery Act, for the reporting year listed above.

Doug Bartole
Chief Executive Officer and Director
May 8, 2024