

**Forced Labour & Child
Labour Policy**

2024

Revision History

Revisions	Effective Date	Reasons for Revision
Revision No.		
Version 1	January 1, 2024	New policy established.

1. Purpose

The purpose of this Forced Labour & Child Labour Policy (“**Policy**”) is to provide direction to employees and partners of Harvest Operations Corp. (“**Harvest**”) in ensuring appropriate and responsible business conduct is embedded in Harvest’s supply chain processes and practices to reduce the risk of forced labour and child labour. This Policy addresses Harvest’s commitment to finding practical, meaningful, and appropriate responses to support the prevention and effective elimination of forced labour and child labour practices, in accordance with the principles set forth by the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”) and similar legislations in force in each of the provinces of Canada.

This policy is intended to be read and interpreted with Harvest’s *Whistleblower Policy*, *Code of Business Conduct & Ethics Policy*, and *Workplace Discrimination, Violence, Bullying and Harassment Policy*.

2. Applicability

This Policy applies to all Harvest employees, officers, directors, contractors, subcontractors, consultants, and suppliers/partners of Harvest or of direct or indirect wholly owned subsidiaries of Harvest.

3. The Policy

Harvest and its subsidiaries shall not employ any person below the age of sixteen (16) years, or the local minimum employment age, whichever is higher. Harvest strictly and explicitly prohibits the use, by any of its suppliers/partners, of child labour and forced or compulsory labour. No employee is made to work against his or her will, or subject to corporal punishment, to threat or to coercion of any type in relation to work. There is a zero-tolerance policy towards any breach of this Policy.

4. Supply Chain Due Diligence

Harvest and its subsidiaries strictly prohibit the use of forced labour or child labour by a supplier and provides that suppliers must conduct reasonable due diligence on their own supply chains and operations to ensure that there is no use of forced labour or child labour.

As part of its supplier/vendor selection process, Harvest shall gather requisite information to understand the credibility and suitability of prospective partners. The main purpose of this approach is to assess and address potential risks, prevent potential forced and child labour impacts, and remediate actual impacts in Harvest’s own operations, supply chain and other business relationships.

5. Implementation

This Policy is and shall at all times be publicly available throughout Harvest’s Intranet and external website, and clearly communicated to all employees in a manner in which it can be understood. Employment contracts and other records, documenting all relevant details of employees, including age, are maintained by Harvest’s Human Resources department and are open to verification by any authorized personnel or relevant statutory body.

6. Compliance & Enforcement

Periodic compliance assessments may be conducted by Harvest; in this context, the Corporate Compliance department may undertake random checks of records no more than on an annual basis. Contravention of this Policy may result in disciplinary action, up to and including termination of employment or supplier/vendor contractual agreements. Nothing in this Policy is intended, nor will it be construed, as restricting, limiting or otherwise affecting any applicable laws or regulations.

7. Review

This Policy will be reviewed by Harvest Management at a minimum, every two years, with any proposed amendments submitted to the CEO for review.

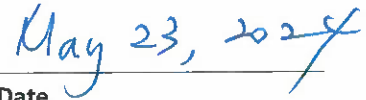
Policy Category:

CATEGORY:	Corporate
APPLICATION:	Harvest & Subsidiaries of Harvest
DEPARTMENT:	Legal
DOCUMENT OWNER:	VP, Legal, General Counsel & Corporate Secretary
EFFECTIVE DATE:	January 1, 2024
REVIEW REQUIRED:	2026

Approved by:



Jungwoo Seo, President & CEO



Date