

REPORT ON MODERN SLAVERY

FOR THE YEAR ENDED DECEMBER 31, 2024

LOS CANADA OPERATIONS ULC

Approved by the Board of Directors of LOS Canada Operations ULC on May 28, 2025

**LOS Canada Operations ULC
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1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) requires that certain entities report on the measures they have taken during the fiscal year to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains. This Report on Modern Slavery (this “**Report**”) is being prepared and filed by LOS Canada Operations ULC (“**Liberty**”) in compliance with its reporting requirements under the Act.

This Report refers to the 2024 fiscal year (i.e., January 1, 2024 to December 31, 2024) (the “**Reporting Period**”) and describes measures taken by Liberty during the Reporting Period.

Liberty does not tolerate child labour, forced labour or any other form of modern slavery. Liberty’s fundamental policy is to conduct its business with honesty and integrity in accordance with the highest legal and ethical standards. Liberty and its directors, officers and other employees must comply with all applicable legal requirements of Canada and each other country in which Liberty conducts business.

2. Steps taken to prevent and reduce the risk of forced labour or child labour

Liberty considers the respect of human rights to be a fundamental corporate responsibility and a value governing all of its activities. Liberty will under no circumstances make use of forced labour or child labour and will only employ individuals who are working of their own free will.

During the Reporting Period, Liberty took the following steps to prevent and reduce the risk that forced labour or child labour was used in its business and supply chains:

- **Continued commitment to upholding and respecting human rights:** Liberty’s ultimate parent company, Liberty Energy Inc. (the “**Parent**”), has developed and adopted various policies which govern the business and affairs of the Parent and its subsidiaries, including Liberty (collectively, the “**Liberty Organization**”). These policies relate to the protection of human rights and general compliance with laws and include a Corporate Code of Business Conduct and Ethics (the “**Code of Conduct**”) and an Employee Handbook (the “**Employee Handbook**”). The Code of Conduct sets out that all directors, officers and other employees must respect and obey the laws of the cities, states and countries in which the Liberty Organization operates. The Code of Conduct also encourages directors, officers and other employees to report violations of applicable laws, rules, regulations, the Code of Conduct or any other code, policy or procedure governing the Liberty Organization.
- **Updates to corporate policies:** During the Reporting Period, the Employee Handbook was updated to include a reference to the Act. Liberty also developed and adopted its own employee handbook (the “**Canadian Employee Handbook**”), which also references the Act. The Employee Handbook and the Canadian Employee Handbook specifically indicate that Liberty and its representatives are prohibited from engaging in any activity that supports, encourages, or is linked to forced labour, modern slavery or human trafficking.
- **Careful selection of suppliers:** The Liberty Organization screens all of its prospective suppliers for sanctions and public charges. The Liberty Organization’s agreements with suppliers also require

that the suppliers abide by all applicable laws, which includes laws relating to forced labour and child labour.

- **Diligent monitoring and communication with suppliers:** During the Reporting Period, the Liberty Organization conducted internal reviews of its suppliers to identify which may be exposed to markets with a higher likelihood of forced labour or child labour and initiated discussions with suppliers to understand their internal processes and supply origins. In addition, the Liberty Organization audits its suppliers on an ongoing basis and supplier scores from these audits are reviewed at least monthly. During the Reporting Period, the Parent did not identify any occurrences of forced labour or child labour within the Liberty Organization’s supply chain.
- **Employee training initiatives:** During the Reporting Period, the Parent provided mandatory training to Liberty’s employees regarding the Code of Conduct and compliance with laws generally (including forced labour). The Liberty Organization also hosts mandatory orientation classes for all new employees which include training regarding company policies, safety and forced labour.

More details on the above actions are set out in this Report.

3. Corporate structure, activities and supply chains

Corporate Structure and Activities

Liberty is incorporated under the *Business Corporations Act* (British Columbia). Liberty is a privately-held company and has no subsidiaries. Liberty is an indirect subsidiary of the Parent, whose common shares are listed for trading on the New York Stock Exchange under the symbol “LBRT”. The Parent’s corporate headquarters are located in Denver, Colorado and the Liberty Organization’s operations are mainly located in North America. As of December 31, 2024, the Liberty Organization had approximately 556 employees in Canada and 5,718 employees in total.

The following table shows the inter-corporate relationships within the Liberty Organization as of December 31, 2024.

Company	Jurisdiction	Ownership
Liberty Oilfield Services LLC (“ Liberty Oilfield ”)	Texas	100% owned by the Parent
Liberty Power Innovations LLC (“ Liberty Power ”)	Texas	100% owned by the Parent
LOS Odessa RE Investments, LLC	Texas	100% owned by Liberty Oilfield
LOS Cibolo RE Investments, LLC	Texas	100% owned by Liberty Oilfield
Liberty Advanced Equipment Technologies LLC	Texas	100% owned by Liberty Oilfield
LOS Leasing Company LLC	Texas	100% owned by Liberty Oilfield
Freedom Proppant LLC	Delaware	100% owned by Liberty Oilfield
LOS Kermit LLC	Delaware	100% owned by Liberty Oilfield
Proppant Express Solutions, LLC	Delaware	100% owned by Liberty Oilfield
LOS Canada Holdings Inc.	British Columbia	100% owned by Liberty Oilfield
LOS Canada Operations ULC	British Columbia	100% owned by LOS Canada Holdings Inc.

Liberty Power Trucking LLC	Texas	100% owned by Liberty Power
Liberty Power & Logistics LLC	Texas	100% owned by Liberty Power
Liberty Power Real Estate Company LLC	Texas	100% owned by Liberty Power

The Parent is a leading integrated energy services and technology company focused on providing innovative hydraulic fracturing services and related technologies to onshore oil and natural gas exploration and production companies in North America. The Liberty Organization offers customers hydraulic fracturing services, together with complementary services including wireline services, proppant delivery solutions, field gas processing, compressed natural gas delivery, data analytics, related goods (including our sand mine operations), and technologies that will facilitate lower emission completions, thereby helping our customers reduce their emissions profile.

While the Liberty Organization sells and distributes certain oil and gas-related goods within North America, the majority of the revenues earned by the Liberty Organization come from providing the services outlined above. The products used in the performance of these services (e.g., proppant, chemicals, sand, hydraulic fracturing equipment, personal protection equipment, etc.) are an essential component of the Liberty Organization's operations. As further outlined below, these products are sourced by the Liberty Organization's dedicated supply chain team and the vast majority of these products are either developed, extracted or produced by the Liberty Organization or sourced from suppliers within North America. These suppliers are subject to an initial screening process and are regularly monitored and audited thereafter.

The Liberty Organization's areas of operations are in all of the most active shale basins in North America, including the Permian Basin, the Williston Basin, the Eagle Ford Shale, the Haynesville Shale, the Appalachian Basin (Marcellus Shale and Utica Shale), the Western Canadian Sedimentary Basin, the Denver-Julesburg Basin and the Anadarko Basin. The Liberty Organization's operations also extend to a few smaller shale basins, including the Uinta Basin, the Powder River Basin and the San Juan Basin.

Supply Chains

The Liberty Organization has a dedicated supply chain team that manages sourcing and logistics to ensure flexibility and continuity of supply in a cost-effective manner across our areas of operation. The Liberty Organization has built long-term relationships with multiple industry leading suppliers of proppant, chemicals and hydraulic fracturing equipment and have started to internally design and assemble key pump and maintenance parts. In addition, the Liberty Organization has built a strong relationship with the assemblers of our custom-designed hydraulic fracturing fleets.

The Liberty Organization purchases a wide variety of raw materials, chemicals, personal protective equipment, parts and components that are manufactured and supplied for our operations. The Liberty Organization is not dependent on any single source of supply for those products. The Liberty Organization largely relies on suppliers from North America for its raw materials, chemicals, personal protective equipment, parts and components. However, these suppliers often source or manufacture their products outside of North America, including in regions like Europe and Southeast Asia.

4. Policies and due diligence processes in relation to forced labour and child labour

The Parent and Liberty have implemented policies and due diligence processes in relation to forced labour and child labour. These policies and due diligence processes are explained in greater detail below.

Policies

The Liberty Organization is committed to embedding human rights considerations into its policies, governance framework and decision-making. As indicated above, the Employee Handbook and the Canadian Employee Handbook reference the Act and specifically indicate that Liberty and its representatives are prohibited from engaging in any activity that supports, encourages, or is linked to forced labour, modern slavery or human trafficking. The Employee Handbook and the Canadian Employee Handbook also indicate that: (i) we expect that all organizations with whom we have a business relationship will adhere to and uphold our commitment to human rights, including the right to work without being subjected to forced labour, modern slavery or human trafficking; and (ii) we are committed to treating workers with dignity and respect.

The Liberty Organization has also adopted other policies that generally reinforce our commitment to operating in accordance with the highest ethical standards and all applicable laws, regulations, policies and procedures. The Code of Conduct requires that all directors, officers and other employees must respect and obey the laws of the cities, states and countries in which the Liberty Organization operates. The Code of Conduct requires all officers within the Liberty Organization to sign and return a certification whereby the officer acknowledges receipt of the Code of Conduct and agrees to comply with the policies and procedures set forth in the Code of Conduct. The Parent has also developed and adopted a Health, Safety and Environment Manual which reiterates the commitment of the Liberty Organization and its employees to comply with all laws, regulations, policies and procedures.

The Parent has also implemented various procedures for employees within the Liberty Organization to report human rights violations and other illegal acts. The Code of Conduct encourages directors, officers and employees to report violations of applicable laws, rules, regulations, the Code of Conduct or any other code, policy or procedure governing the Liberty Organization. In addition, the Employee Handbook and the Canadian Employee Handbook provide a phone number and website for employees to report illegal conduct, unethical behaviour and violations of the policies governing the Liberty Organization. Finally, the Parent's website provides an "Ethics Reporting" function which allows any person to anonymously report a violation of law or company policy, unsafe workplace conditions, or other legal or compliance concerns.

Due Diligence Processes

Prior to engaging a prospective supplier, the Liberty Organization utilizes a software to screen the particular supplier for sanctions and public charges. The Liberty Organization's agreements with suppliers also require that the suppliers abide by all applicable laws, which includes laws relating to forced labour and child labour.

The Liberty Organization also conducts internal reviews of its suppliers to identify which may be exposed to markets with higher likelihood of forced labour or child labour and initiates discussions with suppliers to understand their internal processes and supply origins. In addition, the Liberty Organization audits its suppliers on an ongoing basis and supplier scores are reviewed at least monthly. The Liberty Organization

is committed to working with its suppliers to address potential areas of risk and to work together to mitigate any areas of concern.

5. Areas of risk and steps taken to manage risk

The Parent has worked to identify and address risks within the activities and supply chains of Liberty and the broader Liberty Organization and will continue to strive to identify emerging risks. The Parent has accomplished this by: (i) conducting an internal assessment of risks of forced labour and/or child labour in the Liberty Organization's activities and supply chains; (ii) mapping activities and supply chains; (iii) continuing to monitor the Liberty Organization's own operating procedures; (iv) auditing suppliers; (v) monitoring suppliers; (vi) developing and implementing grievance mechanisms to address complaints in the workplace; (vii) developing and implementing due diligence processes for identifying the use of forced labour and child labour in the Liberty Organization's activities and supply chains; and (viii) developing and implementing training and awareness materials on forced labour.

The vast majority of the Liberty Organization's suppliers are located in North America, which reduces the risk of forced labour or child labour in our direct supply chains. In addition, the Liberty Organization's continuous monitoring of its suppliers serves to reduce the risk of forced labour or child labour in our supply chains. The Liberty Organization recognizes that, in many cases, our suppliers located in North America have in turn purchased goods from suppliers located in other regions (including, among others, Europe and Southeast Asia). The Liberty Organization has less visibility on the practices of these indirect suppliers, and as a result, identifying risks associated with these indirect suppliers is more complex. However, as indicated above, the Liberty Organization has conducted internal reviews of its suppliers to identify which may be exposed to markets with higher likelihood of forced labour or child labour and initiated discussions with suppliers to understand their internal processes and supply origins. The Liberty Organization will evaluate industry best practices and internal processes which could improve the transparency surrounding our indirect suppliers.

6. Measures taken to remediate any forced labour or child labour

During the Reporting Period, Liberty did not identify any instances of forced labour or child labour in its activities and supply chains, nor were any such instances of forced labour or child labour reported to Liberty. As a result, Liberty did not take any measures to remediate any forced labour or child labour during the Reporting Period.

7. Measures taken to remediate the loss of income

Liberty acknowledges that efforts to prevent and reduce the risk of forced labour and child labour may lead to a loss of income for vulnerable families. However, during the Reporting Period, there were no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in Liberty's activities and supply chains. As a result, Liberty did not take any measures to remediate any loss of income to vulnerable families during the Reporting Period.

8. Training provided to employees on forced labour and child labour

During the Reporting Period, Liberty did not offer a formal course or training program relating solely to modern slavery. However, the Parent delivered mandatory training and awareness programs to Liberty's

employees (as outlined below), and these training programs outline the internal standard operating procedures of the Liberty Organization. The training programs identified below are also intended to increase employee awareness regarding general compliance with laws, including laws related to forced labour and child labour.

- **Code of Conduct Training:** During the Reporting Period, all of Liberty's employees were required to undergo mandatory training covering topics such as harassment, discrimination, bribery and corruption, misappropriation of resources and raising concerns. This training was developed externally, and the duration of the training was approximately 1-2 hours. Employees were required to complete a quiz after each section of the training session and received a certificate upon completion.
- **Annual Compliance Training:** During the Reporting Period, the Parent provided training that covered topics contained in the Code of Conduct. This training session was mandatory for all of Liberty's employees and provided information regarding forced labour and other supply chain considerations. This training was developed internally, and the duration of the training was approximately 20 minutes.
- **New Hire Orientation Class:** During the Reporting Period, all new employees of Liberty received mandatory training covering topics such as forced labour, human resources policies, safety and job expectations. This training was developed internally, and the duration of the training was approximately 1-5 days.

The Liberty Organization is committed to embedding human rights considerations into its training and decision-making. In the future, Liberty plans to implement mandatory training for all of its employees which will relate specifically to forced labour and child labour.

9. How we assess effectiveness

During the Reporting Period, Liberty did not have any 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. However, Liberty does not tolerate child labour, forced labour or any other form of modern slavery, and is committed to supporting and respecting the protection of human rights in its business and supply chains.

10. Approval and Attestation

Pursuant to Section 11(4)(a) of the Act, this Report was approved by the Board of Directors of Liberty on May 28, 2025.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I, in the capacity of President of Liberty, attest that I have reviewed the information contained in this Report for the entity 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 Period.

Full name: Ron Gusek

Title: President

Date: May 28, 2025

Signed by:

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I have the authority to bind LOS Canada Operations ULC