

# Forced Labour in Canadian Supply Chains: 2024 Annual Report



# Table of Contents

3. INTRODUCTION

4. ABOUT GRAN TIERRA ENERGY  
CORPORATE GOVERNANCE

5. SUPPLY CHAIN

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6. REQUIREMENTS OF OUR SUPPLIERS

7. INTERNAL CONTROLS

8. GRAN TIERRA ENERGY'S HUMAN RIGHTS POLICY & STRATEGY

9. PILLAR 1: GTE'S DUE DILIGENCE PROCESS

11. PILLAR 2: TRAINING

12. PILLAR 3: MONITORING SYSTEMS & REMEDIATION

13. PILLAR 4: TRANSPARENCY & STAKEHOLDERS

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14. GTE PROJECTS FOCUSED ON THE PREVENTION OF CHILD LABOUR & FORCED LABOUR  
THE KEY PARTNERS PROGRAM

15. PREVENTING CHILD RECRUITMENT

16. CONCLUSION

# Introduction

Gran Tierra Energy Inc. is committed to operate at the highest levels of responsible business conduct, through the adherence and application of the highest Human Rights and Business international standards, as well as in strict compliance with the legislation of the countries where the company operates. The Company creates and ensures a non-discriminatory and respectful work environment for all its personnel and contractors, offering safe and healthy working conditions. It is also committed to managing human rights risks within its business and through its supply chain, including working to combat forced labour and child labour and is submitting this report to:



1. Address the requirement of the Canadian Department of Public Safety in accordance with the **Act to Combat Forced Labour and Child Labour in Supply Chains**.
2. Share additional information regarding preventative actions implemented by Gran Tierra Energy, both within the Company and throughout its supply chain in order to prevent the materialization of potential risks associated with forced labour or child labour, and more generally for fundamental rights.
3. Demonstrate its public commitment and actions to respect and promote human rights, in line with internationally recognized standards, including the International Bill of Human Rights and the International Labour Organization Conventions (ILO) – particularly the fundamental rights principles set forth in the ILO Declaration on Fundamental Principles and Rights at Work. The Company is also committed to apply relevant international norms and standards, including:
  - i. **the United Nations Guiding Principles on Business and Human Rights (UNGPs);**
  - ii. **the Voluntary Principles on Security and Human Rights;**
  - iii. **the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;**
  - iv. **the OECD Due Diligence Guidance for Responsible Business Conduct;**
  - v. **the United Nations 2030 Agenda for Sustainable Development.**

The information referenced in this document corresponds to the period of January- December 2024, pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. The Terms "Gran Tierra", "GTE", "we", "us", "our", or "the Company" is a reference to all the Reporting Entities. For the purposes of the Act, this document includes information about:

1. Gran Tierra Energy;
2. GTE's corporate due diligence on human rights actions, related to risk analysis and management processes for risk prevention and/or mitigation;
3. GTE's training and programs in all areas of the organization with a special focus in preventing forced labour and child labour in the supply chain.

# About Gran Tierra Energy

Gran Tierra Energy Inc. together with its subsidiaries is an independent international energy company currently focused on oil and natural gas exploration and production in Canada, Colombia, and Ecuador. The Company's common stock is listed on the New York Stock Exchange (NYSE American), the London Stock Exchange (LSE), and the Toronto Stock Exchange (TSX) under the ticker symbol GTE. Gran Tierra believes in creating value for all of our stakeholders through oil and gas exploration and production, capitalizing on the global operating experience of our team. We are building a record of success, in a transparent, safe, secure and responsible way.

Gran Tierra's management team has a proven track record of successfully managing large, international projects across Latin America, Africa, the Middle East, Asia and Canada. The Company has assembled a diversified, high-quality asset base which is 100% operated in Colombia and Ecuador, and 69% in Canada. The Company currently operates a total of 25 blocks in Colombia and Ecuador, spanning three basins and over 1.5 million gross acres. As of November 2024, Gran Tierra also now holds large contiguous areas in Alberta, Canada, spanning 1.2 million gross acres across the Western Canadian Sedimentary Basin.

Gran Tierra has 293 million barrels of oil equivalent of proved plus probable reserves which is based on Q4 2024 actual product of 46,619 barrels of oil equivalent per day and translates to almost 17 years of reserve life.

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## Corporate Governance

Gran Tierra is committed to conduct its business in an honest, fair, and safe manner, and has established these principles in a comprehensive and binding set of corporate policies. The Company conducts training annually to inform employees and contractors of all relevant policies and requires compliance throughout the organization, including its contractors and business partners.

Gran Tierra Energy's Board of Directors provides independent oversight of the Company and are elected each year by the Shareholders at the Annual Meeting. The Board is responsible for overseeing the risks to which our business is exposed and to ensure that processes are in place to identify, monitor, and manage them effectively. The Board delegates responsibility for the execution of certain aspects of risk control at its committees to thus ensure appropriate expertise, support, and diligence. These Board committees oversee relevant risk areas and report periodically to the Board. These committees include: the Health, Safety, and Environment Committee, Nominating and Corporate Governance Committee, Reserves Committee, Compensation Committee and Audit Committee.

The Company's corporate policies reflect Gran Tierra's commitment to governance and provide the necessary guidelines to ensure safe and comprehensive operation at all levels and are binding for employees, contractors and suppliers.

**The Company's policies include:**

- [Code of Business Conduct and Ethics](#)
- [Compliance with Anti-corruption Laws](#)
- [Health, Safety and Environmental Policy](#)
- [Human Rights Policy](#)
- [Corporate Security Policy](#)
- [Disclosure Policy](#)
- [Insider Trading Policy](#)
- [Whistleblower Policy](#)
- [Personal Data Policy](#)



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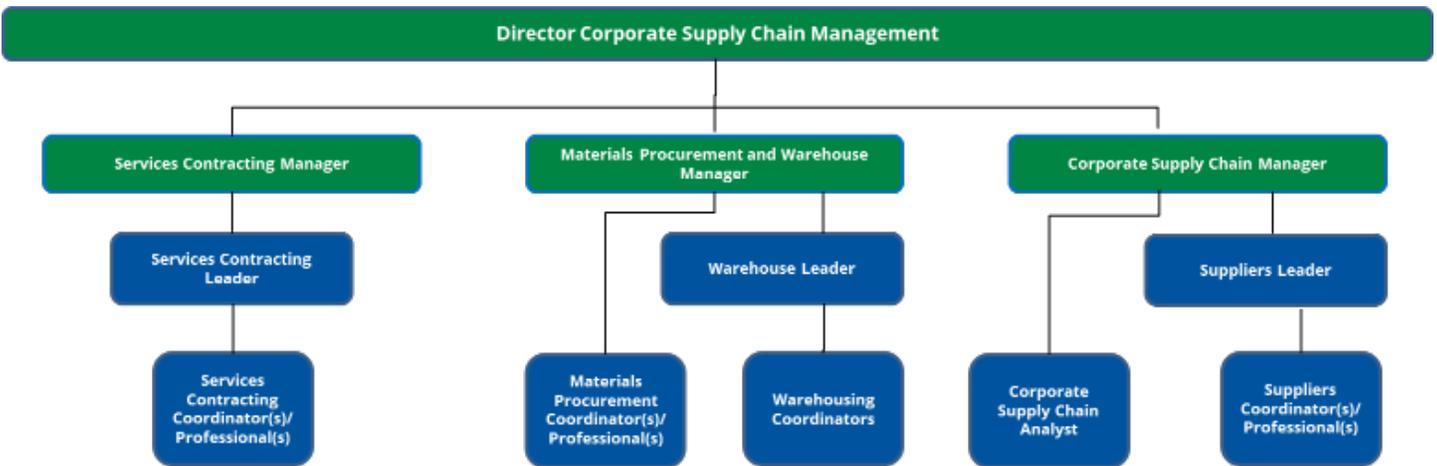
## Supply Chain

Gran Tierra Energy works with suppliers, contractors and companies that provide services locally and internationally in the regions where it operates. To ensure that our operations are conducted with the highest ethical and transparent performance, Gran Tierra requires strict adherence to all of its Corporate Policies throughout its supply chain. Furthermore, the Company conducts its operations in alignment with the ILO Fundamental Principles and Rights at Work of the 1998 International ILO Declaration, including a commitment to the elimination of child labour, forced labour, discrimination in the workplace, and recognition of freedom of association – all essential to maintaining excellence in operations. These standards are clearly outlined in the Company's, "**Gran Tierra Energy Supplier and Contractor Expectations**" procedure, which is publicly available on the Company's website.

As part of the Company's processes to acquire goods and services, and to manage its supplier database, GTE is constantly identifying factors that may affect the execution of its compliance policies, including preventing forced and child labour. The Company bases its decision making on policies, controls, and guidelines set out by the parent company, securing compliance with all current standards and regulations of law in the countries where the company operates. In Canada and the United States of America, the Company complies through the Foreign Corrupt Practice Act (FCPA) of the United States and the Securities and Exchange Commission (SEC) of the United States, as well as the internal policies, procedures and provisions in matters of Occupational Health, Industrial Safety, Preservation of the Environment, Code of Ethics and Quality Systems.

Figure 1. shows the structure of the GTE Supply Chain team where it is evident that all operations related to the procurement of goods and/or services are the responsibility of the Director, Corporate Supply Chain Management. These operations and their management are carried out in accordance with the law, Gran Tierra's internal regulations and SOX regulations.

**Figure 1. Gran Tierra Energy Supply Chain Structure**



# Supplier Accountability and Internal Controls on Labour Standards

## REQUIREMENTS OF OUR SUPPLIERS

Gran Tierra also has procedures in place for its supply chain partners whereby it establishes the commitments required from the companies working with us. This includes their obligations related to human rights, to avoid any practice associated with promoting child labour or forced labour, which is prohibited in all our operations and in those of our partners. In South America, these requirements are included within the contracts that our supply chain partners are required to sign in order to work with Gran Tierra Energy. **In 2024, 332 contracts were entered into with 200 suppliers for the provision of goods and/or services in Colombia and Ecuador. 100% of these contracts included human rights clauses and a document called "The Responsible Practices for the Respect of Human Rights (RPRHR)".** Gran Tierra Energy requires that its suppliers provide services to the Company in accordance with the principles established in its Corporate Policies and, through their contracts, agree to implement human rights practices in accordance with the RPRHR.

Gran Tierra Energy guarantees that the working conditions, both internal and those of our contractors and subcontractors, are fair, competitive in the market, and comply with safety and well-being standards for all workers. In the Company's contracts for suppliers and contractors two key documents are included that explicitly commit them to:

- "Conduct business operations and practices in a manner consistent with the Fundamental Principles and Rights at Work of the 1998 International Labour Organization (ILO) Declaration, including the elimination of child labour, forced labour, discrimination at the workplace, and recognition of freedom of association." (See Annex: Expectations of Gran Tierra Energy suppliers and contractors).
- "The Contractor shall not participate in, encourage or attempt to benefit, and require its personnel not to participate, encourage or attempt to benefit, from national or international crimes, including, but not limited to, war crimes, crimes against humanity, genocide, torture, forced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, arms or drug trafficking, child labour or extrajudicial, summary or arbitrary executions. (See Annex No. 14 RESPONSIBLE PRACTICES REGARDING RESPECT FOR HUMAN RIGHTS).

The Company has also implemented a policy that requires workers and contractors to report suspected activities related to any human rights violation, including forced labour and child labour, to strengthen due diligence and help prevent these potential impacts on human rights from materializing.

## INTERNAL CONTROLS

Gran Tierra is committed to compliance with labour regulations and the prevention of child labour and forced labour. One way the Company does this is through a robust control and verification system that includes databases with employability matrices, where key information is recorded such as date of birth, residence certificate, and identification for each worker. This ensures that all hired people meet the legal age and other legal conditions required to perform their duties.

Additionally, in Colombia and Ecuador, GTE is subject to government reviews by the respective Ministries of Labour, which conduct inspections to verify that companies are complying with the national legal framework.



# Gran Tierra Energy's Human Rights Policy & Strategy

Gran Tierra operates with full conviction and commitment to respect internationally recognized human rights, applying without limitation, the international standard of the United Nations Guiding Principles on Human Rights (UNGPs) and actively supports the best performance in human rights by the organizations with which it works. The recognition of human dignity, as well as respect for rights, be it individual or collective, are principles that are observed in all areas of the Company's activities, including in and through its supply chain.

Gran Tierra Energy's Human Rights Policy reflects the Company's public commitment to respect and protect all internationally recognized human rights. The Company places special emphasis on its corporate policy and contractual annexes, including zero tolerance clauses in relation to situations of forced labour, child labour and the worst forms of child labour. These measures reinforce the Company's commitment to ensuring that its operations and supply chains adhere to the highest human rights standards, promoting a safe, ethical and fair working environment.

The Company undertakes human rights due diligence processes in order to identify, prevent, manage, and report on the potential negative impacts that its activities may have on human rights, and based on those processes, the Company established its corporate Human Rights Strategy. This strategy and its associated actions ensure that operations are carried out with respect and promotion of human rights, maintaining a people-centred approach in everything we do. Then, through employee training, monitoring systems, and collaboration with stakeholders, Gran Tierra Energy ensures that we uphold these principles in all areas of the Company.

Gran Tierra Energy's corporate Human Rights Strategy is based on the Company's Human Rights Corporate Policy that was updated in 2019. It is focused on the management of four pillars, with the goal of the prevention of potential risks in relation to human rights and our operations.



### The four pillars of Gran Tierra's Human Rights Strategy are:

- 1. DUE DILIGENCE:** Identification and management of priority human rights risks through rigorous due diligence processes. These analyses are conducted on average every three years by an external, accredited and independent party.
- 2. TRAINING:** Strengthening employees, contractors, and suppliers' skills and knowledge about human rights and its connection to the Company's business operations. This is a fundamental pillar because it works to prevent potential violations of fundamental rights by those involved in executing our operations, including our supply chain partners.
- 3. MONITORING SYSTEMS & REMEDIATION:** The Company has a comprehensive grievance management system whereby; all stakeholders are encouraged to communicate any concerns or alerts to the Company. All communications received through this channel results in follow-ups by the appropriate teams and written responses to all inquiries. In the case of a human rights violation, a response would be followed by the execution of timely and proper remedial actions, in accordance with the UN Guiding Principles.
- 4. TRANSPARENCY AND STAKEHOLDERS:** Building trust and legitimacy through transparency with our stakeholders is another important priority for GTE. This pillar is based on the fundamental rights of Participation and Access to public information.



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## Pillar 1: GTE's Due Diligence Process

Gran Tierra Energy has recently implemented a heightened due diligence process that allows risks to be identified and evaluated more rigorously, based on the complex contexts in which operations are performed. This approach includes risk prioritization with the assistance of experts, which reinforces our commitment to act with responsibility, transparency and respect in all processes.

The due diligence process is conducted on average every two years by an external, accredited and independent party. A heightened Due Diligence process is continuously linked to Gran Tierra Energy's Grievance Management System. The most recent identification and prioritization of human rights risks was performed in 2023 for the Company's operations in Ecuador and Colombia, including through the supply chain. This process was led by Shift, the leading centre of expertise on the United Nations Guiding Principles on Business and Human Rights (UNGPs). This independent nonprofit organization collaborates across all sectors to help integrate respect for human dignity into corporate practices.

GTE and Shift first collaborated in 2019 to identify and work to address human rights topics related to the Company's business operations and its supply chain. Since then, not only has Shift led an independent review of GTE's due diligence processes for its Colombia and Ecuador operations, but they have also provided GTE with guidance on integrating best practices for supporting human rights throughout our business. As a result, GTE has improved its approaches in various aspects such as implementing human rights in GTE's policies, developing strategies to manage human rights risks and addressing the influence of operations on human rights.

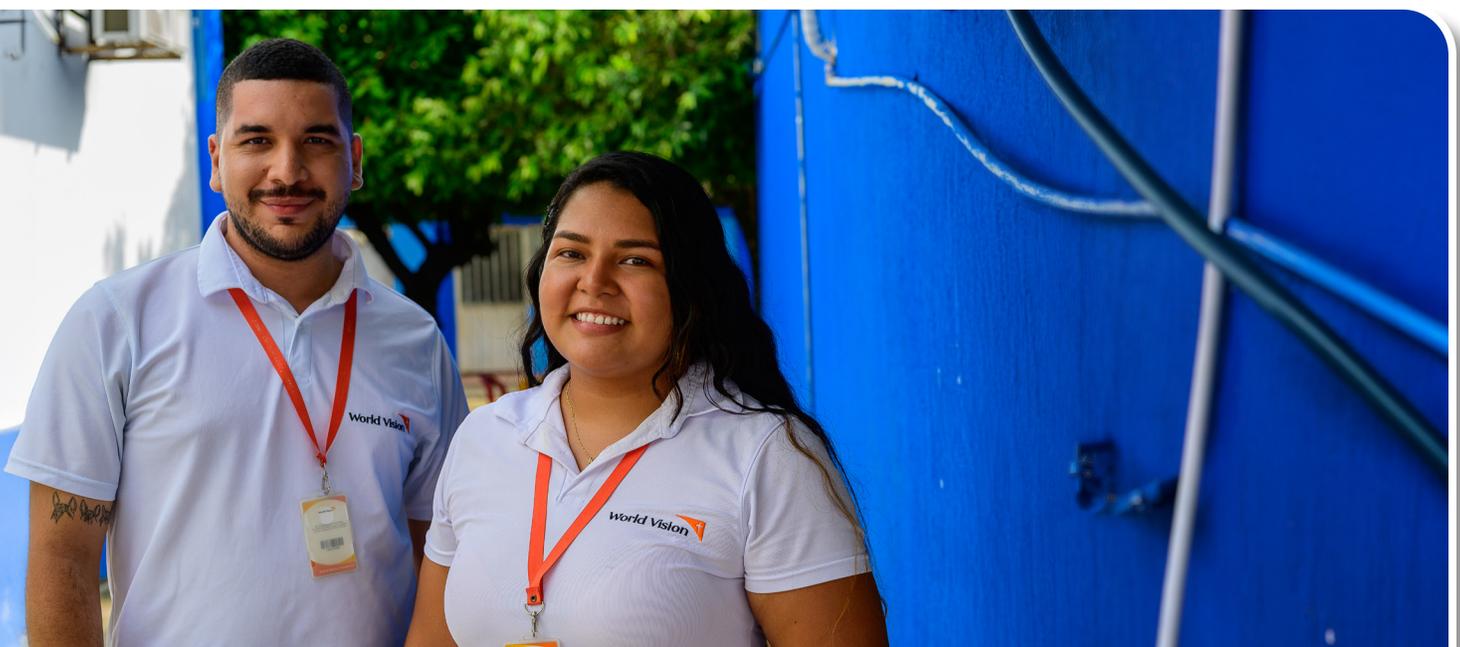
Gran Tierra is also one of 18 companies that participate in Shift's Business Learning Program, which was designed to support companies that are committed to working to fulfill their responsibility to respect human rights.

- **Evidence of high-level commitment to business and human rights**
- **Demonstrated organizational capacity to drive the implementation process**
- **Support for the broader, mission-driven learning approach**
- **Coherence with human rights principles**

Through this work and the independent risk identification reviews of Gran Tierra's business practices, Shift found no risks related to forced labour or child labour within the Company's operations, its area of influence, or in its supply chain.

In 2025, the Company will undergo the due diligence process of identifying and prioritizing human rights risks in the Company's newly acquired Canadian operations.

As indicated above, the Company's most independent recent human rights due diligence risk analysis revealed no risks related to possible violations associated to forced labour or child labour either within the Company or in its supply chain. **Nevertheless, Gran Tierra operates with a prevention approach in mind and is always working to enhance the lives of the communities living near its operations.** As a result, the Company implements additional preventative actions and processes that contribute to the prevention of potential situations associated to forced labour or child labour.



## Pillar 2: Training

A fundamental part of Gran Tierra's commitment to respect and promote human rights is training that supports the integration of the Company's Human Rights Policy at all levels of the Company and its operations. Gran Tierra conducts activities in order to strengthen and enhance the knowledge of human rights and associated risks, including the requirements set out in its corporate Human Rights Policy, among its employees, contractors, and those in our supply chain.

The focus is not only to create a business culture based on respect for human rights but also to provide its employees and contractors with the necessary knowledge and tools to address potential human rights issues. By having ongoing and consistent training opportunities, the Company trains its team and contractors in the concepts of human rights, our Human Rights Policy and how to prevent any human rights violations, as a result of our operations. This includes the detection and prevention of forced and child labour.

Since 2021, Gran Tierra has implemented a program focused on strengthening the understanding and implementation of good human rights practices in our contracting companies. This work has been done in collaboration with two key partners, Hemisferio Consultores and academia through the ICESI University. To date, more than 20 local companies have participated in the program, receiving training and education in Human Rights and Business. In addition, participants have been provided with continuous support to create and formalize human rights policies of their own. This has translated into an increased commitment among Gran Tierra's suppliers for the respect and promotion of human rights in their businesses.

Gran Tierra has also hosted additional in-person training sessions to support our growing operations in Ecuador. In 2023, GTE carried out human rights focused training, led by Shift, on the standards of the Guiding Principles of Human Rights and Business. This training workshop was attended by 60 people, the majority being of supply chain partners, but also in attendance were government officials and civil society organizations. In addition, GTE hosted a session with 19 of the Company's supply chain partners in Lago Agrio (a town close to our operations). At this session topics included: GTE's Human Rights Policy, the Company's operating philosophy, and contractor requirements to apply our corporate policies and contractual clauses, including those of human rights.

In 2024, the Company developed a new way to train employees, contractors and supply chain partners. This new virtual course created by GTE's Human Rights team, deepens knowledge and understanding of the principles of human rights and how they intersect with the daily activities of the people working for and with Gran Tierra. The course is offered through an online learning platform that will launch in 2025 and includes interactive modules, practical cases and evaluations that will ensure employees and contractors have a deep and applicable understanding of GTE's human rights approach, commitment and requirements.





In order to raise awareness on specific potential risks from a human rights perspective, the course will include a module on promoting the respect of human rights of vulnerable groups within the communities where we operate in Colombia and Ecuador. Additionally, the training program will address how employees and contractors – across all regions, including Canada, can help prevent forced labour and child labour from their individual roles in the Company. In this module, information about forced and child labour is shared, including the seriousness of these violations. Attendees will be provided with the necessary tools to identify and prevent forced and child labour.

Another training initiative that has been developed in 2024, is a training course focused specifically for the transportation companies and their drivers in our supply chain. Transportation companies have been identified as a critical stakeholder to engage with in order to prevent child and forced labour cases. This training program will target 800 drivers in all of our areas of operations and will implement workshops to promote awareness and knowledge related to child and forced labour issues.

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## Pillar 3: Monitoring Systems & Remediation

GTE has created the necessary tools to monitor and manage complaints filed with respect to any human rights violation, including cases of forced or child labour. The Company, its workers, and its supply chain are required to collaborate with local, national, and international authorities, including in any investigations.

In addition, Company has a comprehensive grievance management system called Gran Tierra Te Escucha (Gran Tierra Listens) whereby, all stakeholders are encouraged to communicate any concerns or alerts to the company. This program includes many ways for people to contact the Company including by mail, email, phone, and physical offices that provide easily accessible channels for stakeholders, including members of the communities next to our operations, to raise issues and engage in two-way communication with the Company.

All communication received through this channel results in actions taken by the appropriate teams and written responses during the process of addressing the inquiries. In the case of a human rights violation, a response would be followed by the execution of timely and proper remedial actions, in accordance with the UN Guiding Principles.

In 2024, the Gran Tierra Te Escucha program received 1,196 queries in Colombia and 331 in Ecuador, of which 100% were resolved in a timely manner. To date, no cases of forced labour or child labour have been received; however, we have the appropriate processes in place to manage any situation should it arise.

Gran Tierra is also committed to maintaining an open dialogue with local, regional, and national governments, local communities, civil organizations, and NGOs in the areas where it operates, so it can obtain key information to identify and address risks of child and forced labour, and report progress relative to risk management.

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## Pillar 4: Transparency and Stakeholders

Gran Tierra is committed to respect and promote the rights of participation and access to information for all stakeholders, fully complying with legal obligations in these areas. The GTE Human Rights team leads the promotion and enforcement of this framework within the Company. In 2024, GTE implemented a range of internal tools to enhance our transparency standards, aligning with international agreements like Rio, Paris, and Escazú, as well as local government guidelines. These tools have been shared with GTE employees and contractors and are becoming an integral part of our operations. They support human rights, environmental licensing, conflict monitoring, social management, and community projects.

In addition, the Company maintains and builds relationships with various institutional, governmental and civil society actors in the area of human rights. Our objective is to find new partners and allies to implement strategic actions and initiatives that will generate positive benefits for the people who live and work next to our operations.



# GTE Projects Focused on the Prevention of Child Labour and Forced Labour

## THE KEY PARTNERS PROGRAM: SUPPORTING THE RESPECT AND PROMOTION OF HUMAN RIGHTS THROUGHOUT GTE'S SUPPLY CHAIN

Gran Tierra's successful Key Partners program has evolved from a simple award given to the best performing vendors into an integrated, multi-stage program with five components:

1. Developing close, beneficial relationships with existing and potential vendors through continuous contact with dedicated company staff. This ensures ongoing dialogue and alignment between vendor and company.
2. Dedicated high-value training offered to managers and owners of vendor companies delivered in partnership with regional Chambers of Commerce.
3. Supply Chain standards that ensure GTE's contractors are also sourcing from local suppliers.
4. Performance evaluations that measure, recognize and reward outstanding vendors.
5. Facilitating relationships between contractors and local suppliers to foster a growing ecosystem of opportunities for area businesses.

This program has led to tremendous growth in the capabilities, capacity and competitiveness of vendors in the areas where the Company operates. GTE's Key Partners program helps supply chain partners develop their technical, sustainability, human rights and administrative capabilities. Including through educational programs tailored to the needs of local suppliers in partnership with well-respected academic institutions and regional Chambers of Commerce.

Through the Key Partners program, Gran Tierra recognizes the importance of maintaining strong and sustainable relationships with its suppliers and contractors and expects that they understand and apply the Company's contractual human rights policies, including the Human Rights Policy, and take a firm stance against corruption in all business practices.

As part of the 2024 Key Partners program, the Company hosted workshops for its suppliers and contracting companies focused on human rights and Human Rights and Business. These workshops addressed basic human rights concepts and also included information about the Company's zero tolerance policy for any forms of forced or child labour. 60 suppliers participated from our operations in Colombia and 40 companies from Ecuador. Gran Tierra Energy partnered with the Universidad del Rosario of Colombia because their institution is recognized as having regional experts in this area. The University not only implemented these workshops but also provided additional technical support to the participants after the sessions were complete.

These workshops will continue into 2025, with the aim of supporting 120 companies in GTE's supply chain in Colombia and Ecuador in developing human rights policies, internal processes for identifying risks, and management plans to help prevent potential human rights violations.



## PREVENTING CHILD RECRUITMENT

Gran Tierra Energy, the FC Barcelona Foundation, Colombia's Agency for Reincorporation and Normalization (ARN), and the World Vision International Foundation, continued their strategic alliance into 2024 to increase resilience in vulnerable children and reduce their susceptibility to two important human rights concerns in the area: substance abuse and militia recruitment.

Financed by GTE, the program is implemented by the Youth Violence Prevention Program of the Barça Foundation and uses football as a unifying tool for children from vulnerable populations, children living in poverty and descendants of Afro-Indigenous minorities to learn about conflict resolution, prosocial behaviour development and other important life skills. Expected long-term outcomes include stronger, more stable communities, greater education attainment, increased employment and positive health indicators.



According to the Colombian Family Welfare Institute (ICBF), the project has been effective in preventing forced recruitment of minors, having documented multiple cases of preventions in program participants. The project also helps female victims of sexual and physical violence with psychiatric, emotional and legal support.

To date, the project has benefited more than 2,500 children and young people, including participants from ethnic communities and diverse population groups, as well as their families, impacting more than 5,000 people in the regions where we operate. Furthermore, the methodology has been adopted by educators from eight educational institutions, extending the scope of the project.

The project has also managed to strengthen and create participatory and training spaces in the educational community. These spaces allow teachers, parents, and students to expand their knowledge and skills in child protection. As a result, the initiative contributes to building more effective, sustainable protection systems that better address the needs of the children. Its positive impact on local communities is outstanding.

### Results of the project so far include:

- **+2,500 children and youth participants**
- **8 educational institutions linked to the project**
- **+30 trainers certified in Futbolnet at the University of Barcelona**
- **12 children's rights violations reported and managed with local authorities**
- **10 cases of forced recruitment prevented**

Thanks to this project, GTE has contributed to the consolidation of care and protection scenarios for children and young people, promoting through its influence the rejection of violations related to forced labour or child labour, as well as offering access to information related to government entities and officials in charge of managing these issues.

# Conclusion

Gran Tierra remains committed to human rights and the prevention of violations related to forced labour and child labour, consolidating effective management through both its due diligence processes and associated preventative actions. Up to and including 2024, there have been no instances or risks identified throughout our business and supply chain which indicate potential issues associated with child labour or forced labour, demonstrating effective management in this critical area.

Through its ongoing due diligence process, comprehensive training of employees and contractors, a grievance management structure for reporting issues, and robust supply chain regulations, GTE has a solid framework in place to identify and address any issues related to forced and child labour.

The Company is also more effective in its implementation as a result of the partnerships we are undertaking these key actions with. Including allies such as government entities, non-governmental organizations, and other stakeholders (National and International Government Entities, Barcelona Football Club Foundation, World Vision International, Shift, Ideas for Peace Foundation, CREER, among others).

These organizations have experts in human rights who are enhancing the Company's work and projects every day, so that not only can it operate in a responsible and sustainable manner, ensuring that it meets the highest human rights standards, but also to be leaders by example to our peers and other businesses operating in the regions where we work.



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