



2025 Freehold Royalties Ltd. Modern Slavery Report

Freehold Royalties Ltd. ("**we**", "**our**", "**Freehold**" or the "**Corporation**") has created this report to meet our 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 an oil and gas royalty company operating in Canada and the U.S., we recognize the responsibility we have to ensure our operations and the supply chains that support our operations adhere to the highest ethical standards, which includes no use of modern slavery in our business or supply chains.

This report covers the Corporation's activities and the activities of our subsidiaries listed in Appendix A during our previous financial year, January 1, 2025 to December 31, 2025. For this period, the Corporation determined that we were required to report under the Modern Slavery Act.

In April 2025, the Corporation ceased all operated production activities and no longer manages any tangible equipment or conducts any operations related to production or sales of any working interest oil, gas or natural gas liquids. The Corporation continues to operate as a royalty interest owner and undertakes limited reclamation work on legacy sites. Since Freehold no longer produces goods, imports goods, or controls any entity engaged in the production or importation of goods, the Corporation is assessing whether it continues to fall within the scope of a reporting entity under the Modern Slavery Act. If it is determined that the Corporation no longer meets the definition of a reporting entity, the Corporation will not file a report under the Modern Slavery Act for the year ended December 31, 2026.

Steps Taken During 2025

Over the past five years, the Corporation has been focused on growing its royalty interest assets, while also reducing its operated and non-operated working interest assets. In April 2025, the Corporation successfully shut-in the remaining operated working interest assets, concluding production operations.

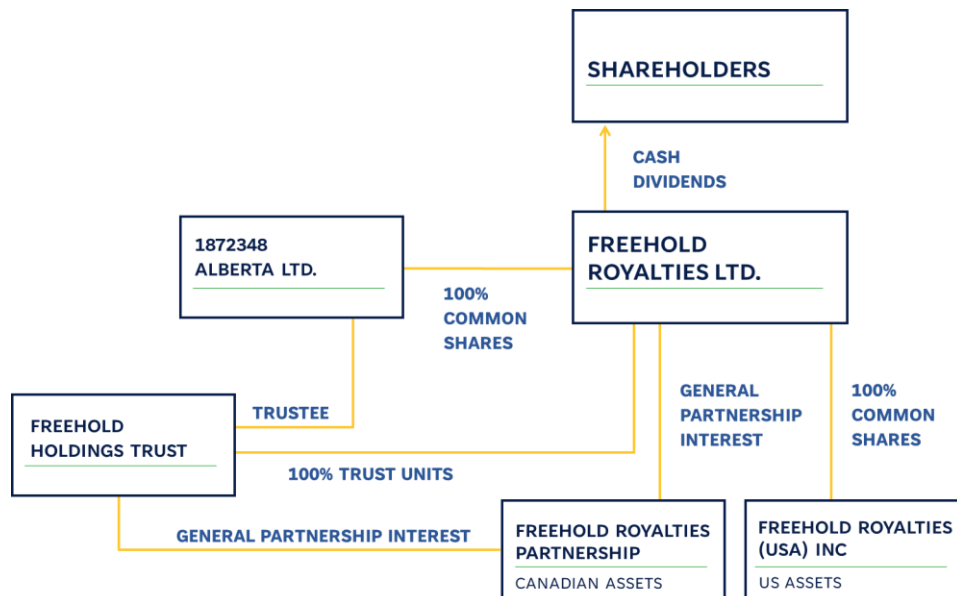
As a royalty interest owner, Freehold does not pay any of the capital costs to drill, complete and equip the wells for production on its properties, nor does it incur cost to operate the wells, maintain production and ultimately restore the land to its original state. All these costs are paid by third parties who conduct activities on the royalty lands.

As a result of the operational changes, the Corporation did not undertake new initiatives in the area of modern slavery risk mitigation, and we are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain.

Structure, Activities and Supply Chains

- **Structure:**

The following diagram sets forth the organizational structure of Freehold:



- **Management**

Historically, Freehold and its subsidiaries were managed by Rife Resources Management Ltd. (the "**Manager**") under the terms of a management agreement and Rife Resources Ltd. ("**Rife Resources**") provided the Manager on a contract basis, with all necessary personnel, equipment and facilities required to provide management and operational services to Freehold on a cost recovery basis.

As a result of the arrangements with the Manager and Rife Resources as described above, Freehold had no employees in 2025. On December 31, 2025, the management agreement was terminated and on January 1, 2026, the employment of all Freehold continuing employees was transferred to Freehold. In total, 50 individuals were transferred to Freehold. The transition of personnel to Freehold does not affect the Corporation's assessment of whether it engages in activities captured by the Modern Slavery Act, as the Corporation remains a non-operating royalty interest owner.

- **Operations:**

Freehold manages one of the largest non-government portfolios of crude oil and natural gas royalties in Canada with an expanding land base in the United States. Our total land holdings encompass approximately 6.0 million gross acres in Canada and includes exposure to approximately 1.2 million gross drilling acres in the US. We have interests in more than 21,000 producing wells and receive royalty income from over 380 industry operators.

- **Supply chains:**

Following the cessation of operated production activities, Freehold's remaining procurement relates primarily to reclamation and site restoration services for legacy sites. These activities do not involve the production or importation of goods.

Freehold does not have significant supply chain activity in its role as a royalty interest owner. Freehold does not pay any of the capital costs to drill, complete and equip the wells for production on its properties, nor does it incur costs to operate the wells, maintain production, and ultimately restore the land to its original state. All these costs are paid by third parties who conduct activities on the royalty lands. Freehold receives royalty income from gross production revenue (revenue before any royalty expenses and operating costs are deducted) and does not have any ownership in the tangible production equipment on its royalty interest properties.

Accordingly, Freehold's key vendors are professional advisors (legal, audit, tax, reserves, investor relations, human resources, banking, insurance), software applications and regulatory services.

Additional information regarding the corporate structure and operations of the Corporation can be found in the 2025 Annual Information Form, annual financial statements and related management's discussion and analysis for the year ended December 31, 2025, which are posted on our website (<https://freeholdroyalties.com/investors/#filings>) and filed on SEDAR+ (www.sedarplus.com).

Policies and Due Diligence

Policies

Given our limited operational footprint and the nature of our procurement, the application of these policies continues to focus on service providers supporting reclamation and corporate activities.

The Corporation's Code of Business Conduct and Conflict of Interest Policy (the "**Code**") requires its directors and officers as well as all Rife Resources employees and consultants to have high standards of professional and ethical conduct. In addition, the Code requires compliance with the spirit and the letter of all applicable laws, rules and regulations including the Modern Slavery Act and any other legislation relating to modern slavery.

The Corporation's External Supplier Policy and Code of Conduct (the "**Supplier Code**") requires that its suppliers operate in ways that contribute to the welfare of their key stakeholders and respect the rights of all constituents affected by their operations. In addition, the Supplier Code requires that its suppliers comply with applicable laws and regulations in the jurisdictions in which they do business, including the Modern Slavery Act and any other legislation relating to modern slavery.

The Corporation's Human Rights Policy establishes guiding concepts regarding how the Corporation identifies, prevents and mitigates human rights risks and issues associated with its assets and operations. It requires that the suppliers, officers, directors and employees of the Corporation (and historically, Rife Resources and their personnel) adhere to human rights principles. Those principles include the right of personnel to be treated fairly, ethically, respectfully, with dignity, without harassment and without discrimination and the obligation of personnel to not participate in or allow forced, child, enslaved or trafficked labour.

Furthermore, Freehold has a Whistleblower Policy pursuant to which Freehold's directors, officers, employees and other service providers can anonymously report wrongdoing. Freehold has committed to promptly and thoroughly investigate any reports and complaints made thereunder.

Due Diligence

Given the minimal nature of our direct procurement activities and the transition away from operated production, the Corporation did not implement new initiatives in 2025; however, we continue to monitor our limited supply-chain exposure, which now primarily relates to reclamation services providers. We are not aware of any high-risk exposure to modern slavery associated with the Corporation's supply chain. We may in the future consider implementing additional procedures to ensure we are not unknowingly engaged in business with any entities involved in modern slavery.

Activity and Supply Chain Risks

The Corporation is not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains.

Remediation Measures

We are not aware of the existence 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 the Corporation's actions.

Employee Training

The Corporation has ensured that the Freehold directors, officers, employees, (and historically, Rife Resources employees) are aware of the reporting requirements under the Modern Slavery Act.

Freehold directors, officers and employees (and historically, Rife Resources employees) annually acknowledge their commitment to adhering to the Code.

Freehold is not aware of any high-risk exposure to modern slavery associated with the Corporation's business or supply chains and, as such, had not implemented any specific employee training other than as noted herein.

Assessment of Effectiveness

The Corporation has not yet implemented any specific policies or processes to assess our effectiveness in ensuring that modern slavery is not used in the Corporation's business or supply chains, although Freehold closely monitors compliance with the Code and Supplier Code through whistleblower reporting, through which there have been no complaints in 2025.

Approval and Attestation of the Report

This report was approved by the Corporation's Board of Directors in respect of the Corporation and its subsidiaries listed in Appendix A on March 11, 2026 pursuant to paragraph 11(4)(b)(ii) of the Modern Slavery Act and will be 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 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of the Corporation, and with no personal liability, that the information in this report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Act, for the reporting year listed above.

(signed) "Marvin Romanow"

Marvin Romanow
Chair of the Board
March 11, 2026

I have the authority to bind the Corporation.

Appendix A Subsidiaries

1. Freehold Royalties (USA) Inc.
2. Freehold Royalties Partnership
3. 1872348 Alberta Ltd.
4. Freehold Holdings Trust