



FRONTERA ENERGY CORPORATION

SOCIAL INVESTMENT AND COMMUNITY AID POLICY

1. Introduction

To align the ESG strategy developed by Frontera Energy Corporation's (the “**Corporation**”) sustainability policy, the present Social Investment and Community Aid policy (the “**Policy**”) defines the general framework under which the Corporation implements these concepts.

The Corporation is aware of the impact that the activities that it performs can have in the communities in the areas where it operates. Therefore, the Corporation complies with contractual and legal obligations and honors commitments with communities which promote development, enhance quality of life, and support the social fabric of those communities.

2. Policy Administration

The corporate social investment committee (the “**CSIC**”) will administer and implement the Policy, subject to any direction provided by the board of directors of the Corporation (the “**Board**”) and the provisions hereof.

3. Definitions:

Community Aid: The philanthropic aids that the Corporation or any of its majority owned subsidiaries provide in favor of natural or legal persons¹, Communities, or Public of Interest Organizations, to satisfy specific needs of a noble or humanitarian nature within the areas in which the Corporation operates.

Communities: The set of people who are located in the same or nearby geographical area and on whom the Corporation's operations generate an impact, due to their geographical proximity to the projects carried out in the different countries in which the Corporation operates.

Social Investment: Refers to the support provided by the Corporation in favor of Communities or Public of Interest Organizations, for the development of social benefit projects with a broad and generalized scope. Social Investment can become mandatory (if it originates from a contractual, regulatory or environmental obligation) or voluntary (if it arises from the mere liberality of the Corporation).

¹ Contribution restrictions are included in this Policy.

Public of Interest Organizations: They are associations, groups, community groups, social, indigenous, afro-descendant organizations, public or private institutions that promote, execute and/or represent the interests of a group of people located in areas in which the Corporation operates.

4. Details of Community Aid:

- a. Community Aid may be provided in-kind, including but not limited to the delivery of assets that have zero cost in the Corporation's books ("**Exposed Assets**")².
- b. Community Aid may consist in projects.
- c. Community Aid may also entail resources which must be properly budgeted and duly approved.

Community Aid must be formalized and documented in accordance with the corporate formats adopted for such purpose.

When Community Aid is between USD\$ 1 to USD\$ 8,000, it must comply with the Social Environment Engagement Fund Manual ("*Manual del Fondo de Relacionamento con el Entorno*" in Spanish), while Community Aids that exceed USD\$ 8,000 must adhere to the provisions of this Policy.

Social Investments and Community Aids (together "**Contributions**") that consist in projects and in-kind contributions different to Exposed Assets will be managed in accordance to corporate procedures established by the Corporation's Supply Team.

5. General Guidelines

5.1. Eligibility

The CSIC will be responsible for evaluating, prioritizing and approving Social Investments and Community Aids. For the contributions whose amount is less than USD\$ 8,000, the CSIC will delegate the functions of evaluation, prioritization and approval to the Corporation's Marketing, Logistics and Business Sustainability Vice Presidency and the Corporate Affairs Director. These contributions will be informed periodically to the CSIC.

The guidelines for the Social Investment and Community Aid will be defined by the CSIC, except for the Community Aids that are regulated in the Social Environment Engagement Fund Manual.

5.2. Contribution Limits

- Contributions shall not exceed, in any fiscal year, the amount established in the annual budget approved by the Corporation.
- Contributions must comply with applicable laws and regulations.
- Contributions must consider the benefit to the community and the opportunity for long term value creation.
- Contributions will be carried out in a manner that is consistent with the Corporation's Code of Business Conduct and Ethics, the Conflicts of Interest Policy, the Anti-Bribery and Anti-Corruption Policy, the Sustainability Policy, the Anti-Asset Laundering and Terrorist Financing Policy, and the

² The Corporation's Supply Team will confirm when an asset is an Exposed Asset before it can be contributed.

Gifts and Invitations Policy.

5.3. Restrictions on Contributions

In addition to any other restrictions defined by the CSIC, the Corporation shall not be permitted to make any Social Investments and Community Aids:

- that are made in cash or cash equivalents, such as: vouchers, checks, tickets, gift cards, etc.;
- that are intended for individual natural persons except in exceptional cases that have been explicitly approved by the CSIC;
- that materialize in the form of controlled substances;
- that are delivered in favor of public officials;
- that are addressed to support political parties, religious organizations, candidates or causes;
- that benefit individual natural or legal persons (i) with whom the Corporation has disputes in judicial or administrative instances or (ii) who have asserted claims against the Corporation;
- that could be construed as attempting to secure preferential treatment for the Corporation or an employee of the Corporation (or a member of his/her immediate family);
- that are given primarily to affect the judgment of the recipient with respect to business (or other) dealings with the Corporation or any of its employees;
- that are given to obtain any improper advantage or benefit of any kind so as to induce or influence an action or decision; or
- that if public disclosure thereof would prove to be an embarrassment for the Corporation.

5.4. Document Retention

All correspondence, requests for Social Investments or Community Aids, and supporting documents in connection with their delivery, shall be retained by the Corporation in accordance with the Corporation's document retention policies.

Currency of the Policy

This is a Board Policy and it was last revised effective January 15, 2022.