



ALBERTA TUBULAR
PRODUCTS LTD.

Supply Chains Act Report

For the Year Ended March 31, 2024

1. Introduction

This report (the "Report") constitutes Alberta Tubular Products Ltd. ("Alberta Tubular" or the "Company"), inaugural report about its efforts to prevent and reduce the risk of child and forced and child labour in our supply chains and for the financial year ending March 31, 2024. This Report is made pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

2. Structure, Activities, and Supply Chain

Structure

Alberta Tubular is a privately held entity incorporated under the *Business Corporations Act* (Alberta). The Company's head office is located in Calgary, Alberta, and currently employs 21 employees in a variety of skilled roles such as Sales, Accounting, and Finance.

Alberta Tubular is engaged in providing Oil Country Tubular Goods ("OCTG"), Line Pipe, and accessories predominantly to the oil and gas industry.

Activities

Within the oil & gas industry, Alberta Tubular's team has distinguished itself by showing a comprehensive understanding of the needs of our clients. For major projects, challenging environments, or an ongoing source of supply, we can skillfully recommend and supply the appropriate products and services, and our industry connections allow us to proactively work solutions beyond those we currently provide.

Alberta Tubular' key activities are as follows:

1. Procuring inventory from manufacturers and other distributors.
2. Stocking inventory across four provinces (AB, BC, MB, and SK) in independently owned and operated yards.
3. Facilitating coating of Line Pipe, and the alteration of OCTG specified by customers.

In addition to these three key activities, Alberta Tubular will provide shipping when requested.

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The Company's direct (Tier 1) suppliers are based solely out of Canada and can be grouped as providing Alberta Tubular with either inventory or services. In 2023, Alberta Tubular engaged with many suppliers that provided Alberta Tubular with goods that make up its inventory, including but not limited to:

- OCTG
- Line Pipe
- HDPE Pipe; and
- Accessories such as Wrapid/wraparound sleeves, high-temp sleeves, multi-layer sleeve system, directional drilling kits and various tapes.

Our service providers provided a variety of services including, but not limited to, storage, shipping, alteration of products including slotting, coating, threading, inspection, and repairs.

3. Policies and Due Diligence

Policies

Alberta Tubular updates its Handbook on a regular basis and all employees must sign off on the policies contained therein. The latest version was updated to include provisions related to Human Rights and Modern Slavery on January 18, 2024.

In addition, Alberta Tubular rolled out a Supplier Code of Conduct, that is referenced on every purchase order and is also displayed on Alberta Tubular's website. The Supplier Code of Conduct forms part of Alberta Tubular's commitment to ethical business practice. In particular, it highlights the Company's expectation that its suppliers will commit to the same ethical standard and not engage in unethical business practices, including the use of any form of child or forced labour.

Due Diligence

As part of Alberta Tubular's assessment of its supply chains, we distributed vendor questionnaires to suppliers that accounted for 99.52% of the Company's spend on inventory and related services during the Reporting Period.

Alberta Tubular received the majority (97.66% of spend) of the questionnaires back and, using the information provided in response to the questionnaire, was able to classify and evaluate the risks accordingly. As an annual process, the Company presently intends to revise the questionnaire, as applicable, in response to its assessment of the Company's risks.

4. Potential Risks of Child and Forced Labour in our Operations and Supply Chains

During the Reporting Period, Alberta Tubular took the following steps to prevent and reduce the risk of child and forced labour is used at any step of the production of goods, or of goods imported into Canada:

- Reviewed and considered the Act, the Governmental Guidance and its implications;
- Attended webinar's relating to the Act;
- Created and distributed a supplier due diligence questionnaire;
- Planned for the update to the Employee Handbook;
- Developed and implemented the Supplier Code of Conduct;
- Conducted a mandatory in-person training session relating to the Act, child and forced labour and the changes implemented at Alberta Tubular; and
- Mapped our Tier 1 suppliers.

Operations

Alberta Tubular is a close-knit organization with a low employee count, all of whom are well known. Additionally, all of Alberta Tubular's employees are employed in Alberta and are subject to Alberta's labour and employment standards. Accordingly, based on our low jurisdictional risk and the relatively small number of employees, Alberta Tubular considers the risk of child and forced labour occurring in its operations to be very low.

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With respect to Alberta Tubular's service providers, the Company considers its risk of child and forced labour in this aspect of its supply chain to be low. All service providers are based in Alberta and are subject to Alberta's labour and employment laws. In addition, given the nature of our business, the Company has developed long-term relationships with its service providers given Alberta Tubular insight into the day-to-day operations of these suppliers.

As discussed above, Alberta Tubular mapped all Tier 1 suppliers. However, the Company recognizes that its Tier 1 suppliers are part of a global supply chain and may provide Alberta Tubular with products that originate from countries outside North America. The suppliers of our Tier 1 suppliers are considered Tier 2 suppliers and lower. ATP does not have a direct line of sight to those Tier 2 suppliers and beyond.

Accordingly, while Alberta Tubular buys most of its products from North American mills, with the majority of the products being produced in Canada, the Company is aware that it procures some of its products from other distributors that may import products from countries that have a higher risk of child and forced labour.

As part of its response to the risk caused by a lack of visibility into the Company's Tier 2 suppliers, Alberta Tubular distributed questionnaires to all of the distributors with an annual spend over 0.2% of the total spend. As of the date of this Report, not all distributors have replied to the inquiry even after numerous follow-ups. Alberta Tubular Products considers the 1.17% of distributors that did not reply, as high risk, while the manufacturers that did not reply (0.16%) were categorized as low risk due to their location and scale.

The steps set out in this Report, including the policies and procedures, are intended to mitigate the risks as identified in this section.

Alberta Tubular has not identified any incident of forced labour or child labour within our supply chain and remediation is considered not applicable. Accordingly, Alberta Tubular took no remediation steps during the Reporting Period, including those related to the loss of income affecting the most vulnerable families as a result of remediation efforts.

5. Training

All ATP employees, including senior management and in-house consultants, are mandated to take part in the annual training session about child and forced labour. The training session covers the legislation and the reporting obligations under the Act, discusses the definition of child and forced labour, explains the policies that Alberta Tubular has introduced and provides an overview of the steps Alberta Tubular has taken to review Alberta Tubular's supply chain and mitigate any potential risks.

The training was developed by an external third party and tailored to Alberta Tubular's operations and supply chains. The first annual session lasted 1 hour, included a Q&A, and occurred at Alberta Tubular's office on February 29th, 2024.

6. Assessing Our Effectiveness

As the Company continues to evaluate our compliance measures that are designed to prevent and reduce the risk of child and forced labour in our supply chains and operations, we intend to consider, where appropriate, implementing measures to assess the effectiveness of any of our processes.

7. Approval and Attestation

This statement was approved by the Board of Directors of Alberta Tubular Products Ltd. on May 17th 2024. This statement is signed by Stephen F. Sutton as Co-President on the date shown below.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Stephen F. Sutton, Co-President

Alberta Tubular Products Ltd.

Date: May 17th, 2024

I have the authority to bind Alberta Tubular Products Ltd.

