



Apex on Human Rights: Modern Slavery and Human Trafficking Report

This statement is prepared in accordance with the United Kingdom’s Modern Slavery Act 2015, the Australian Modern Slavery Act 2019, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act, which came into force on January 1, 2024 (“the Canadian Act”).

This report sets out the steps taken by Apex Oilfield Services (2000) Inc. “Apex” to ensure compliance within the Canadian Act and outlines the measures taken to prevent modern slavery including forced labour and child labour, and human trafficking in Apex’s business operations and supply chains. Additionally, it outlines the internal beliefs and core values inherent to Apex.

This report was prepared in collaboration with Apex Senior Management and Ownership.

1. Who We Are

Apex is a leading supplier of drilling equipment rentals and service in the Western Canadian Sedimentary Basin. A private company with humble beginnings, Apex has quietly grown to be the supplier and employer of choice in the energy services industry.

With over 150 employees and dedicated services centers throughout Western Canada, Apex values its people and is committed to adhering to all industry, provincial, and federal regulations.

2. Our Commitment to Human Rights

The protection of human rights is foundational to Apex’s core values and evident in how it conducts its business and treats its employees. Apex is an equal opportunity employer and does not tolerate modern slavery, including forced labour and child labour, or human trafficking in either our business, supply chains, or business partnerships.

3. Our Structure, Operations, and Supply Chains

3.1 *Apex is a privately held company headquartered in Red Deer, Alberta, Canada with a sales office in Calgary, Alberta.*

3.2 *Apex has Operation centers in Estevan and Gull Lake, Saskatchewan. Red Deer, Whitecourt, Lloydminster, Lac La Biche, and Grande Prairie, Alberta, as well as Fort St. John, B.C.*

3.3 *Apex primarily builds its own equipment and mainly sources parts from local suppliers. A single foreign supplier for solids control equipment is used to procure centrifuges integral to the drilling process.*

4. Modern Slavery and Human Trafficking Risks

The risk of Apex contributing to human trafficking and modern slavery is extremely low. Despite this, Apex is committed to providing a safe, respectful, and fair workplace free of harassment and the protection of human rights.

Apex has robust Human Resources policies in place including a Modern Slavery Safe Work Practice (SWP), Ethics and Integrity Policy, and Modern Slavery and Human Trafficking Training for all Apex Employees.

Employees are informed of all Policies and Procedures at time of hire. Compliance and acknowledgment of policies, procedures, and training requirements are tracked and monitored through an HSE compliance software program.

5. How Apex Identifies and Addresses Modern Slavery Risks

A respectful and inclusive corporate culture is part of our foundation. Our Code of Conduct/Ethics reflects our expectation that all employees, suppliers, and business partners uphold our global corporate responsibility relating to modern slavery and human trafficking.

Where elimination is not possible, Apex Oilfield Services will implement control measures to mitigate the risk associated with forced and child labour. Where applicable, Apex Oilfield Services will implement control and monitoring measures related to mitigating the occurrence of forced and child labour as per ILO and IRBC stipulations, and other actions considered best practice, within internal operations and throughout the supply chain. Monitoring mechanisms may be used to provide reporting data for any government-required reporting processes. These actions may include, but are not limited to:

ABUSE AND VULNERABILITY

Control Measures

Analyze recruitment processes and identify any potential abuses of vulnerability, then implement effective solutions to prevent abuses of vulnerability.

Ensure workers are aware of their rights during recruitment and employment. Ensure that discrimination throughout all operational processes is completely absent and prohibited, with workers trained in non-discriminatory practices. Ensure workers know where to seek help if they feel their rights have been violated during both the recruitment process and their employment tenure.

Establish and make available grievance mechanisms to employees during both recruitment and employment. Encourage dialogue between employees about potential grievances they may have with managerial undertakings.

Provide life skill training to workers to ensure they understand situations where they, or others, may be experiencing forced labour.

Monitoring Mechanism

Implement approaches to monitor and record the presence of abuse or vulnerability. Eg. Recording the number of workers that are working with absent or expired documentation.

With consideration to confidentiality, record the amount of known number of incidents of reports of abuse, and/or legal assistance provided to workers within the organization related to abuse and vulnerability associated with work tasks.

Conduct interviews with organizational workers and establish a process where workers feel comfortable discussing grievances within the workplace or reporting them to the applicable authority.

Record the participation in the courses provided to employees regarding life skills.

DECEPTION AND DEBT BONDAGE	
<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Adopt an ethical recruitment policy that adheres to the applicable national law.	Record the incidence of any reported breaches of human rights or employment law that are made by workers or employment candidates, and the incidence of use of recruitment companies who have known unethical practices. To further track and monitor the impact of human rights impact and performance of all workers including subcontractors,
Ensure all parties involved in the recruitment process can be known upon request. E.g. Recruitment agencies, company adverts, etc. Furthermore, investigate recruitment partners, considering those who undertake forced labour practices such as document retention, worker deception, etc.	the company can evoke a process as outlined by section 2.0 of this SWP
Increase managerial involvement, or recruitment partner involvement, from ethically known companies, within the recruitment process, who are trained in, and enact non-deceptive practices.	
Support companies who may use deceptive practices, or where other gaps in human rights practices have been identified, to assist in achieving practices that are less likely to evoke forced and child labour. For any concerns related to human rights breaches or concerns, either internally or within the supply chain, the company will ensure that a process is established as outlined by the regional laws or best practices, to address the concerns effectively	
RESTRICTION OF MOVEMENT	
<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Review organizational practices that may inhibit workers' freedom of movement, or excessive recording of workplace undertakings, and take action to remove these restrictions and actions. If restriction or recording of movement has been established as a safety mechanism, analyze its necessity and if there are more suitable alternatives available.	Record the incidence of actions or dialogue between workers and supervisors relating to removing restrictions to freedom of movement.

ISOLATION

<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Establish grievance mechanisms for individuals who may experience isolation.	Record the use of known grievance mechanisms regarding isolation and instances, where means of communication are provided, where they were otherwise absent.
Engage with stakeholders to facilitate enhanced communication with individuals isolated including undertakings such as the provision of cell phones or other means of communication	

PHYSICAL AND SEXUAL VIOLENCE

<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Establish policies and procedures for managing violence and harassment.	Record data concerning the incidence of reported harassment, gender-risk assessments completed, or committees present that directly address physical and sexual violence.
Identify gender risk through specific assessment.	
Where feasible, establish committees that investigate complaints of harassment, receive complaints, and enforce appropriate remedies aimed at reducing harassment, in accordance with law and company policy.	
Provide awareness training regarding harassment to all workers within the organization.	

INTIMIDATION AND THREATS	
<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Educate workers on how to recognize intimidation and establish an environment where they feel comfortable reporting occurrences.	Record the occurrence of training concerning intimidation and threatening actions.
Interview workers in confidence to help manage potential situations where they may feel intimidated or threatened.	
RETENTION OF IDENTITY DOCUMENTS	
<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Require companies to ensure that workers retain their identity documents and provide individuals with safe storage they can access at any time.	Record statistics concerning any incidence of companies retaining documents from individuals.
WITHHOLDING OF WAGES	
<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Ensure all workers are fairly compensated according to national employment law.	Record the known incidence of companies that do not fairly compensate their employees, incorporate the use of digital wage payment systems, utilize alternate digital payment methods, and incidence of companies withholding wages.
Incorporate the use of digital payment wage systems that register working records and payments.	
When individuals may not have access to digital payment systems, incorporate the use of other digital alternatives that provide tracking of payment. E.g. An E-wallet.	
Provide copies of payslips to workers with information concerning the number of hours worked, pay deductions and pay rates.	

Investigate suppliers directly, or through legal authority who are, or are suspected, of withholding wages, as to if this is appropriate.	
EXCESSIVE WORKING HOURS	
<i>Control Measures</i>	<i>Monitoring Mechanism</i>
Analyze working hours systems that may concern the undertaking of overtime and ensure the way it is undertaken is absent of threats or coercion and adheres to industry standards.	Record any incidence of coercion or threats associated with overtime occurrence.
ABUSIVE WORKING AND LIVING CONDITIONS	
Ensure any worker housing adheres to local legislation, and all workers are provided adequate working conditions.	Record reports or directly observed incidents of abusive working and living conditions.
Conduct training regarding effective communication between workers and supervisors around working conditions and safety risks.	

6. Assessing Effectiveness

The effectiveness of human rights and compliance with the Canadian Act is shared amongst all employees and stakeholders. The Modern Slavery SWP will be monitored regularly for effectiveness, questionnaires for suppliers will be distributed, and components of the Act will be reviewed regularly as part of the Apex HSE program.

7. Process of Consultation and Approval

Apex will review its Modern Slavery and Trafficking Report annually against best practices and in consultation with employees, managers, and stakeholders.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I have reviewed the information contained in this report. Based on my knowledge and having exercised due diligence, I attest that the information in this report is true, accurate, and complete for the purposes of the Canadian Act for the 2023 reporting year.

Lyle G. Kallis



President and CEO

Apex Oilfield Services (2000) Inc.
