

# Modern Slavery Report

## Introduction

Bri-Chem Corp. (“Bri-Chem” or “Corporation”) is committed to acting ethically and with integrity in all of our business dealings and relationships and, as part of that, to working collaboratively with our suppliers to identify and reduce the risk of forced labour or child labour occurring anywhere within our supply chains.

Bri-Chem expects our suppliers to operate in accordance with all applicable anti-slavery laws, including those prohibiting human slavery and slavery-like practices, human trafficking, forced labour and child labour, and particularly including Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

This is the first report of the Corporation under the Act. This report relates to Bri-Chem’s 2023 financial reporting period from January 1, 2023 to December 31, 2023.

## Structure, Activities and Supply Chains

Bri-Chem has established itself, through a combination of strategic acquisitions and organic growth, as a North American industry leader for the distribution and blending of oilfield drilling, completion, stimulation, and production chemical fluids. We sell, blend, package and distribute a full range of drilling fluid products, from 25 strategically located warehouses throughout Canada and the United States.

The following table provides the name and jurisdiction of incorporation, continuance, formation or organization of the subsidiaries of Bri-Chem. The Corporation directly or indirectly owns 100% of the voting securities of the subsidiaries listed below.

Subsidiary	Jurisdiction of Incorporation, Continuance or Organization
Bri-Chem Supply Ltd.	Alberta
Sodium Solutions Inc.	Alberta
Solution Blend Service Ltd.	Alberta
Bri-Corp USA, Inc.	Delaware
Bri-Chem Supply Corp, LLC	Colorado
Sun Coast Materials, LLC	Colorado

Bri-Chem has developed relationships with many oilfield chemical suppliers including domestic manufacturers and international chemical supply companies. These vendors are selected through superior products, pricing, availability and technical support. Bri-Chem’s supply chain and long-

term vendor relationships is an important factor in being a full-service wholesale distribution business. Bri-Chem's vendor network is mainly based in North America but also includes a select group of global suppliers.

## **Policies and Governance**

We have procedures in place which we consider to be appropriate to our business and effective in preventing modern slavery from occurring in our business and our supply chains, and in identifying for the purposes of remediation, any such activity. Bri-Chem's policies and procedures define our expectations of behavior for both employees and suppliers to reduce the potential of supporting forced labour practices.

### *Code of Business Conduct and Ethics*

We foster a culture that prioritizes honesty and integrity in all aspects of our business. We maintain this culture through adherence to our Code of Business Conduct and Ethics, which sets out the guiding principles for all employees, officers and directors of Bri-Chem and its operating subsidiaries. Among other things, the Code of Business Conduct and Ethics requires decisions that comply with the law and are consistent with our values, including human rights, inclusion, equity, ethics and integrity.

### *Supplier Code of Conduct*

This Supplier Code of Conduct outlines the Corporation's requirements regarding the ethical standards and business conduct of its suppliers and sets standards of ethical conduct which the Corporation requires from suppliers when doing business with or on behalf of the Corporation. The Corporation requires its suppliers to adhere to the Supplier Code of Conduct and expects suppliers to implement these requirements in a manner that is appropriate to the nature and scale of their activities, the goods that they supply and the services that they perform. While the Corporation recognizes that its suppliers operate in different legal and cultural environments, the standards set forth in the Supplier Code of Conduct operate as a benchmark for acceptable conduct. Suppliers are also required to take all reasonable measures to ensure they respect, uphold, and communicate the Supplier Code of Conduct across their business and within their own supply chains.

### *Whistleblower Policy*

The Whistle Blower Policy provides procedures for receiving complaints and concerns of employees of the Corporation regarding accounting and auditing matters relating to the Corporation, and violations of the Code of Business Conduct and Ethics of the Corporation, and of any applicable law, rule, or regulation. In addition, our Whistleblower Policy includes a confidential and anonymous reporting process which can be used to communicate any

problematic issues relating to supply chain management. This policy is available and accessible on our website.

### **Assessing and Managing Risk**

Bri-Chem's suppliers are required to review and adhere to the Supplier Code of Conduct. Suppliers will be expected to demonstrate compliance with the Supplier Code of Conduct upon the Corporation's request. The Corporation reserves the right to verify compliance with the Supplier Code of Conduct including through questionnaires, site visits and inspections by Corporation personnel or designated agents. If a supplier fails to comply with any aspect of the Supplier Code of Conduct, immediate notice of the violation must be provided to the Corporation and the supplier shall act promptly to correct the situation to the Corporation's satisfaction.

### **Remediation Measures**

Our Code of Business Conduct and Ethics and Supplier Code of Conduct offer a reporting mechanism for our employees and suppliers to report ethical or legal violations, among other concerns. Our Supplier Code of Conduct also includes information on the Whistleblower reporting, which suppliers can use to raise concerns. If a situation of non-compliance is identified, Bri-Chem will work to develop and implement a corrective plan to improve and remedy the situation.

### **Training**

Bri-Chem is engaging with its suppliers to raise awareness of modern slavery risks and discuss best practices for prevention and mitigation. Bri-Chem is also looking into training options for its procurement and sourcing functions to help them better identify and mitigate these risks in its supply chain. At present, Bri-Chem provides no further mandatory formal training for our current or prospective employees related to forced labour or child labour other than requiring every employee's awareness of, adherence to and compliance with our policies. We are, however, committed to improving the training we provide to our current and future employees related to our policies.

### **Assessing Effectiveness**

We expect to continually improve our effectiveness in identifying and managing the risk of modern slavery in Bri-Chem's supply chain and will be integrating modern slavery considerations in periodic reviews of our suppliers. Relevant policies, including our Supplier Code of Conduct, will be incorporated into our annual policy review process to ensure they remain up-to-date, reflective of our latest processes and in line with best practices.

As part of this exercise, Bri-Chem will assess the effectiveness of its relevant policies on a periodic basis, to prevent and reduce the risk of forced labour and child labour in its activities and supply chains.

## Approval, Attestation and Signature

Approved by the Board of Directors of Bri-Chem Corp. on May 29, 2024.

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities 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.

*(signed) "Don Caron"*

Don Caron  
Chair, on behalf of the Board of Directors of Bri-Chem Corp.

*I have the authority to bind Bri-Chem Corp.*

May 31, 2024