

# Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023 Bill S-211

2023 REPORT

**COLLICUTT ENERGY SERVICES CORP.  
8133 EDGAR INDUSTRIAL CLOSE  
RED DEER, AB T4P 3R4**

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*[collicutt.com](http://collicutt.com)*



# FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT, 2023: Canadian Government Bill S-211

This Fighting Against Forced Labour and Child Labour in Supply Chains Report (the “**Report**”) has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023*(Canada)(the “**Act**”). This Report is made on behalf of Collicutt Energy Services Corp. (“**Collicutt**” or the “**Company**”).

Collicutt Energy Corp. ("Collicutt", "we", "our" or the "Company") has created this report to meet our requirements pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

## INTRODUCTION

Forced labour and child labour, each as defined in the Act, (and referred to as “modern slavery”), are crimes and serious violations of fundamental human rights and are occurring across the globe. As a Canadian energy services company, Collicutt recognizes the important role that we have in ensuring that our operations, which are headquartered in Alberta, Canada, and the supply chains that support our operations, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chains.

The Company may be a reporting entity as defined in the Act. This report covers the Company’s activities during our previous financial year, from January 1, 2023, to December 31, 2023.

The Company takes modern slavery and our reporting requirements very seriously and we are committed to ensuring that we adhere to such requirements. We will continue to evaluate and adapt our processes with respect to modern slavery in our business over time to ensure we are meeting all applicable reporting requirements and other legislation relating to modern slavery.

## Steps Taken to Date

The Company first became aware of the Act in early 2024 and subsequently created a new Company policy called *Fighting Against Forced Labour and Child Labour in Supply Chains* (see Appendix A) to bring attention to the risks and prevention of modern slavery occurring in the Company’s supply chains. At this time, we are not aware of any high-risk exposure to modern slavery associated with the Company’s supply chains. We intend to continue to evaluate our compliance and reporting processes to ensure that our reporting with respect to modern slavery meets the statutory requirements.



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## COLLICUTT ENERGY SERVICES CORP

Collicutt Energy Services Corp. is a recognized expert in engine rebuild and servicing, and a leader in the natural gas and diesel power generation industry. Collicutt is based in Canada with its headquarters located in Red Deer, Alberta. The Company is a family-run business and employed an average of 100 employees throughout Alberta in 2023.

Collicutt operates within the dynamic energy sector, focusing on providing comprehensive power generation solutions, manufacturing power generator packages, engine rebuilds for the oil & gas sector, as well as 24/7 parts and service. The Company's business activities span several key areas aimed at addressing the diverse needs of its clientele, which includes industries such as oil and gas, construction, utilities, healthcare, and data centers, among others.

Additional information on the business can be found at [www.collicutt.com](http://www.collicutt.com).

Refer to Appendix B of this report for the Company's organizational chart.

## SUPPLY CHAINS

Collicutt's supply chains consists of various businesses that support our operations, including vendors, contractors, sub-contractors, and suppliers that offer goods and services related to Collicutt's operations.

## OUR POLICIES

Through our company policies we communicate our values and expectations and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child or forced labour in any of our operations. Our relevant policies are discussed in further details below:

### **Code of Conduct:**

The Company's Code of Conduct is attached as Appendix C and requires the highest standards of professional and ethical conduct from our employees. Our reputation among our clients for honesty and integrity is key to the success of our business. This Code of Conduct reflects our commitment to a culture of honesty, integrity and accountability and outlines the basic business principles and policies with which all employees are expected to comply.

### **Fighting Against Forced Labour and Child Labour in Supply Chains:**

The Company's *Fighting Against Forced Labour and Child Labour in Supply Chains* is attached in Appendix A of this report. This policy was created to uphold ethical standards and ensure compliance. By implementing this policy, the company demonstrates its commitment to human rights and social responsibility, aligning with global initiatives.

We intend to regularly evaluate our approach with respect to modern slavery to ensure the effectiveness of our methodology, including amending existing policies and



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implementing additional policies, as necessary, to mitigate the risks of any actual or perceived modern slavery from occurring in our business or operations to the extent determined necessary.

## **DUE DILLIGENCE**

Our goal is to ensure that we put in place reasonable measures that will enhance due diligence in our supply chain activities, facilitate our legal reporting requirements and ultimately help mitigate the risk of the use of forced labour and child labour in supply chains.

At Collicutt, we are opposed to all forms of forced labour and child labour in our supply chain activities. Through the adoption and implementation of this *Fighting Against Forced and Child Labour in Supply Chain Policy*, we will use our best endeavours through our due diligence process and reporting obligations to ensure forced labour and child labour are avoided and/or reduced in the supply of the goods and services that we procure from our suppliers and that we provide to our clients.

Given the recent timing of the implementation of the Act, the Company has yet to undertake any additional steps to conduct specific due diligence beyond the issuance of our 'Supplier Certification of Compliance' questionnaire relating to the awareness and disclosure of forced labour and child labour in their supply chains. We are not aware of any high- risk exposure to modern slavery associated with the Company's supply chains. 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.

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations.

### ***Remediation Measures***

The Company is 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 had to take 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 Company's actions.

The Company acknowledges the importance of vigilance and ongoing monitoring to ensure that modern slavery risks remain mitigated within our operations and supply chains. We are committed to regularly reviewing our risk assessments and implementing any necessary remediation measures should the need arise in the future.

### ***Employee Training***

All new employees of Collicutt are required to read and acknowledge adherence to all company policies during onboarding.



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The Company will ensure that all employees are aware of the new reporting requirements under the Act.

Collicutt personnel, at all levels, are required to adhere to our *Code of Conduct* and *Fighting Against Forced Labour and Child Labour in Supply Chain* policies and ensure that it is understood and properly applied to their daily activities.

### **Supplier Engagement**

We engage with our suppliers to raise awareness of modern slavery risks and provide guidance on implementing best practices for prevention and mitigation.

## **ASSESSING OUR RISK**

Collicutt engages in various activities to identify, assess, and manage business risks. In assessing the risk of forced and child labour in our business and supply chains, we plan to refer to external compliance databases and publicly available resources and reference materials. As the company develops its risk assessment practices, we will consider engagement with our peers and consultation with external experts to help map supply chains

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as protective equipment and clothing and construction materials sourced in whole or in part offshore through third parties.

## **OUR PROCESS AND EFFECTIVENESS**

We monitor compliance with our policies on an ongoing basis. To date no significant concerns or complaints have been identified.

The Company has not yet implemented any processes to assess our effectiveness in ensuring that modern slavery is not used in the supply chains. The Company's management teams will be reviewing our measures and effectiveness of same on a go forward basis.

## **OUR COMMITMENTS**

Collicutt is committed to upholding the highest standards of ethical conduct, including the prevention of modern slavery in all aspects of our operations.

As a Canadian energy services company, we recognize our responsibility to ensure that forced labour or child labour is not used at any step of the production of goods, whether within Canada or abroad, by our entity or within our supply chains.



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## APPROVAL AND ATTESTATION OF THE REPORT

This report was approved by the Company's senior management, pursuant to paragraph 11(4)(a) of the Act and will be filed with the Minister of Public Safety and Emergency Preparedness.

In accordance with the requirements of the 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 Company, 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 Act, for the reporting year listed above.

*Ryan Krutzfeldt*

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Ryan Krutzfeldt, CPA, CGA

Vice President of Operations - Electronically signed by Ryan Krutzfeldt

I have the authority to bind the Company.




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**Appendix A: Collicutt Energy Services Corp.: *Fighting Against Forced Labour and Child Labour in Supply Chains***

	<b>Collicutt Energy Services Corp. Policies and Procedures</b>	Doc. No:	HR P032
		Initial Issue Date:	May 2024
<b>FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS</b>		Revision Date:	Initial Version
		Revision No:	0
		Next Revision Date:	
		Page:	Page 1 of 4
Preparation: HR Manager	Authority: President	Issuing Dept.:	HR

**PURPOSE:**

Collicutt Energy Services Corp. (“Collicutt” or the “Company”) is dedicated to preventing and reducing the risk of the use of forced labour and child labour in its supply chain activities. By ensuring that our supply chain activities screen for and reduce the use of forced labour and child labour, we will not only be compliant with the Federal Government’s requirements enacted in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023* (also known as the “**Modern Slavery Act**”) but also it will advance our collective vision of providing safe and efficient service to our customers.

Our goal is to ensure that we put in place reasonable measures that will enhance due diligence in our supply chain activities, facilitate our legal reporting requirements and ultimately help mitigate the risk of the use of forced labour and child labour in supply chains.

At Collicutt, we are opposed to all forms of forced labour and child labour in our supply chain activities. Through the adoption and implementation of this *Forced and Child Labour in Supply Chain Policy* (the “**Policy**”), we will use our best endeavours through our due diligence process and reporting obligations to ensure forced labour and child labour are avoided and/or reduced in the supply of the goods and services that we procure from our suppliers and that we provide to our clients.

**OBJECTIVE:**


To ensure that Collicutt has adequate procedures in place to manage the risk of the use of Forced and Child Labour in its supply chain and can demonstrate compliance with the requirements of the Modern Slavery Act.

**DEFINITIONS:**

***Forced Labour*** means labour or service provided or offered to be provided by a person under circumstances that:

1. Could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
2. Constitute forced or compulsory labour as defined in [Article 2 of the Forced Labour Convention, 1930](#), adopted in Geneva on June 28, 1930.

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**Child Labour** means labour or services provided or offered to be provided by persons under the age of 18 years and that:

1. are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
2. are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
3. interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
4. constitute the worst forms of child labour as defined in [Article 3 of the Worst Forms of Child Labour Convention](#), 1999, adopted at Geneva on June 17, 1999.

### **KEY PRINCIPLES**

#### ***Due Diligence***

Collicutt shall implement a due diligence process by incorporating the questionnaire attached to this Policy as *Schedule "A"* to its tendering and bidding processes and procedures as part of its supplier evaluation process.

#### ***Training***

Collicutt shall institute a training program and annual refresher for its employees engaged in the procurement process and shall communicate the Policy across its organization.

#### ***Compliance Statement in Contracts***


Collicutt shall amend its contracting documents including its standard Master Services Agreement to include this statement: *"Contractor and Contractor Related Parties shall not engage in any behaviour related to slavery, unlawful child labour, exploitation of children, forced labour or human trafficking."*

#### ***Enforcing Compliance***

Suppliers must certify compliance by completing *Schedule "A", Bill S-211 – Questionnaire/Supplier Request for Information*. Collicutt shall review the responses provided by the supplier, and where there is an indication of a violation, a potential violation or a gap in approach, suppliers shall work with Collicutt to resolve such violations, potential violations or gaps and suppliers shall undertake to take reasonable measures to comply with this Policy and the Modern Slavery Act.



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Failure or violation by a supplier to comply with this Policy and the Modern Slavery Act may result in disciplinary actions up to and including termination of contracts and subsequent disqualification of certain products/services or as a supplier of Collicutt.

### ***Annual Reporting***

Every year, an annual report will summarize the following:

1. Collicutt's organizational structure, activities, and supply chains;
2. Collicutt's policies and due diligence processes in relation to forced labour and child labour;
3. a description of the parts of the business and supply chain that are exposed to the risk of the use of forced labour and/or child labour and the steps taken to assess and manage those risks;
4. measures taken to remediate any identified forced labour and/or child labour;
5. measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour and/or child labour in Collicutt's activities and supply chain;
6. training provided to employees on the requirements of this Policy and applicable law; and
7. a description of the process for assessing the effectiveness of this Policy.

### ***Approval of the Annual Report***

The Annual Report must be approved by management and submitted annually by May 31<sup>st</sup>.


### ***Accessibility of the Annual Report***

A copy of the Annual Report shall be published on Collicutt's website.

### **REFERENCE DOCUMENTS**

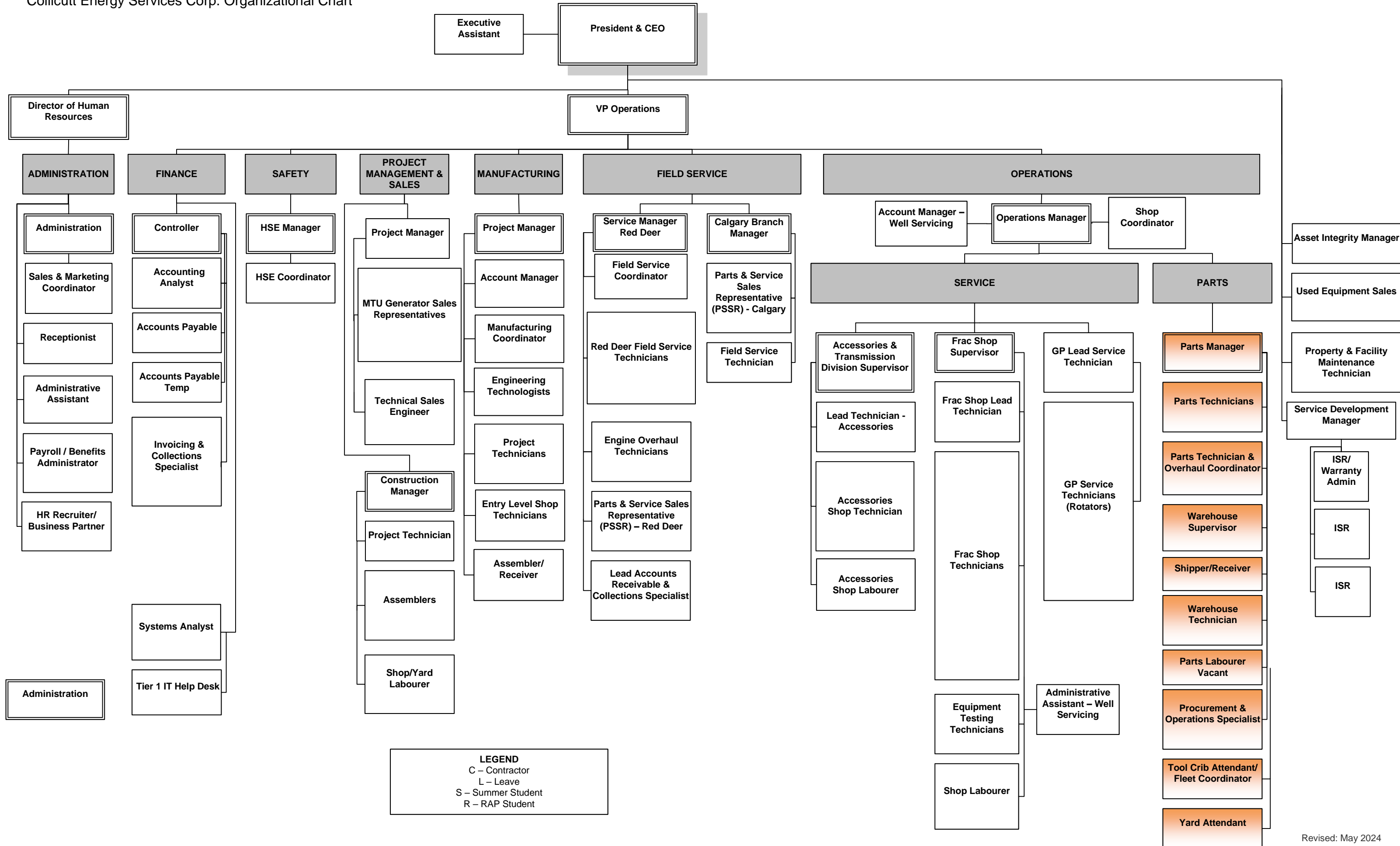
1. Fighting Against Forced Labour and Child Labour in Supply Chain Act, 2023
2. Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930

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3. Child Labour Convention, 1999, adopted at Geneva on June 17, 1999


**Appendix B**  
Collicutt Energy Services Corp. Organizational Chart



**LEGEND**  
 C – Contractor  
 L – Leave  
 S – Summer Student  
 R – RAP Student

## Appendix C

### Collicutt Energy Services Corp. *Code of Conduct*

	<b>Collicutt Energy Services Corp. Policies and Procedures</b>	Doc. No:	HR – P022
		Initial Issue Date:	24-Oct-2014
<b>Code of Conduct</b>		Revision Date:	Initial Version
		Revision No:	0
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### Code of Conduct

Employees shall always comply with all lawful requirements, all policies and procedures, and all rules and regulations of Collicutt Energy.

Employees shall not compromise the integrity or reputation of Collicutt Energy.

Employees should:

- Not criticize the competition
- Not criticize customers or customer equipment
- Not criticize fellow employees
- Display a caring attitude
- Have concern for other people's property
- Be sincere and realistic in making promises to customers
- Take pride in providing high quality work
- Be honest with customers, suppliers, fellow employees and the company

Employees shall avoid possible conflicts of interest. Conflicts of interest include, but are not limited to:

- Accepting money or gifts from any customer or supplier for any personal gain
- Selling products or services on company time that do not benefit Collicutt Energy
- Owning all or a portion of a business that is in competition with Collicutt Energy
- Purchasing products or services from any company where an employee's relative has ownership interest, unless such products are competitively priced. This type of purchase must be done through a non-related staff member.

The consumption or possession of alcohol or illegal drugs by employees on business premises, or in business vehicles, other than at company approved social functions, will not be tolerated in any circumstance.


Whenever it appears an employee may have committed a criminal offense, the matter must be reported immediately to Human Resources. As a general rule, it will be the policy of the Collicutt Energy to prosecute any and all violators to the fullest extent of the law. Examples of criminal offences include, but are not limited to: fraud, theft, misappropriation of funds, bribery, and receipt of secret commissions, embezzlement, and conspiracy.

Due to the highly competitive nature of our industry, business matters are not to be discussed outside Collicutt Energy, and all matters involving Collicutt Energy are to be kept in the strictest of confidence.

Salaries are highly sensitive and must not be discussed among co-workers. Confidentiality in these matters is a company policy that must be strictly adhered to.

## Appendix C

### Collicutt Energy Services Corp. *Code of Conduct*

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All formal communication within the company must be business related and on a professional basis.

Company computer and e-mail systems, and Internet access are provided for official business use only. Every user is expected to use the company computer systems and equipment in a responsible and efficient manner.

Any employee, who breaches the Collicutt Energy Code of Conduct or Code of Business Principles, will be subject to disciplinary action, up to and including termination of employment.