

## 2023 MODERN SLAVERY REPORT (the “Report”)

The following is a joint report prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) by GT Coil Tubing of Canada ULC (“GT”), Pro-Tech Valve Sales-Inc. (“Pro-Tech”), Global Heat Transfer ULC (“GHT”) and Forum Canada ULC (“Forum Canada”, and, together with GT, GHT and Pro-Tech, the “Reporting Entities”). Each of the Reporting Entities is a wholly-owned and indirect Canadian operating subsidiary of Forum Energy Technologies, Inc. (together with its subsidiaries, which for greater certainty includes the Reporting Entities, “FET” or “our” or “we”).

This Report provides an overview of the measures, actions and activities undertaken by the Reporting Entities to assess, prevent and reduce the risk of forced labour or child labour in their business and supply chains. This Report applies in respect of the Reporting Entities’ financial year ending December 31, 2023 and is the first report prepared by each of the Reporting Entities under the Act.

### 1. Overview

FET is a global manufacturing company serving the oil, natural gas, industrial and renewable energy industries. With headquarters in Houston, Texas, FET provides value added solutions aimed at improving the safety, efficiency, and environmental impact of its customers’ operations. Its highly engineered products include capital equipment and consumable products. FET’s customers include oil and natural gas operators, land and offshore drilling contractors, oilfield service companies, pipeline and refinery operators, and renewable energy and new energy companies. Consumable products are used by its customers in drilling, well construction and completion activities and at processing centers and refineries. FET’s capital products are directed at drilling rig equipment for constructing new or upgrading existing rigs, subsea construction and development projects, pressure pumping equipment, the placement of production equipment on new producing wells, downstream capital projects and capital equipment for renewable energy projects. FET continues to develop products to help oil and gas operators lower expenses, increase production, and reduce their emissions while also deploying our technologies in renewable energy applications. FET’s reporting segments align with business activity drivers and the manner in which management reviews and evaluates operating performance. The following three reporting segments describe FET’s reporting segments as of December 31, 2023: Drilling & Downhole, Completions, and Production.

#### A. Activities

***Drilling and Downhole Segment:*** FET’s drilling and downhole segment designs, manufactures and supplies products and solutions to the drilling, artificial lift and subsea markets, including applications in oil and natural gas, renewable energy, defense and communications. The products and solutions consist primarily of (i) capital equipment and consumable products used in the drilling process; (ii) products designed to safeguard artificial lift equipment and cables, and well construction casing and cementing equipment; and (iii) subsea remotely operated vehicles and trenchers, submarine rescue vehicles, specialty components and tooling, and technical services.

Our primary customers in the drilling capital equipment and consumable products product lines include domestic and international drilling rig contractors operating land and offshore based drilling rigs. Our primary customers in the downhole protections systems and casing and cementing tools product lines are oil and natural gas producers, and service companies providing completions, artificial lift and other intervention services to producers. Our subsea vehicle customers are primarily large offshore service companies that serve the oil and natural gas, telecommunications, offshore wind power, and other industries operating in marine environments. In addition, we sell products to a range of governmental organizations including naval, maritime science and geoscience research organizations.

***Completions Segment:*** Our Completions segment designs, manufactures and supplies products and solutions to the coiled tubing, well stimulation and intervention markets. The products and solutions consist primarily of: (i) capital and consumable products sold to the pressure pumping market, including hydraulic fracturing pumps, cooling systems, high-pressure flexible hoses and flow iron, as well as wireline cable and pressure control equipment used in the well completion and intervention service markets; and (ii) coiled tubing strings and coiled line pipe and related services.

**Production Segment:** Our Production segment designs, manufactures and supplies products and solutions for the production and infrastructure markets. The products and solutions consist primarily of: (i) engineered process systems, production equipment, as well as specialty separation equipment; and (ii) a wide range of industrial valves focused on oil and natural gas as well as power generation, renewable energy and other general industrial applications.

We market our valves to our customers and end users through our recognized brands: PBV®, DSI® and Accuseal®. Much of our production is sold through distribution supply companies, with our marketing efforts targeting end users for pull through of our valve products.

## **B. Supply Chain**

FET strives to achieve transparency with its vendors and is focused on critical issues in supply chain management, including ethical procurement and compliance with applicable laws. FET has a network of domestic and international suppliers supporting its global manufacturing footprint. These suppliers are economically diverse in terms of size.

FET acquires component parts, products and raw materials from suppliers, including foundries, forge shops, and original equipment manufacturers. The prices we pay for our raw materials may be affected by, among other things, energy, steel and other commodity prices, inflationary pressures, tariffs and duties on imported materials and foreign currency exchange rates. Certain of our component parts, products or raw materials, such as bearings, are only available from a limited number of suppliers.

In 2023, FET engaged with over 3,000 direct suppliers including with suppliers in the United States of America (“U.S.”), Europe, and Southeast Asia. These aforementioned geographic areas contribute to the highest proportion of suppliers and vendors based outside of Canada. The majority of our Suppliers were located in the U.S.

## **C. Structure**

Forum Energy Technologies, Inc.’s shares are listed on the New York Stock Exchange under the symbol “FET” and its principal executive offices are located in Houston, Texas. Forum Canada is our Canadian operating subsidiary and GT is our Canadian subsidiary which manufactures, sells and distributes coil tubing in Canada under our Completions Segment. Pro-Tech is an FET Canadian subsidiary selling valves under our Productions Segment. GHT is an FET Canadian subsidiary selling radiators and coolers in Canada under our Productions Segment. Each of the Reporting Entities is a wholly-owned and indirect Canadian operating subsidiary within the FET organizational chain.

Each of GT, GHT, Pro-Tech and Forum Canada is a wholly-owned subsidiary of FET, and each of the Reporting Entities is incorporated in the following jurisdiction:

GT Coil Tubing of Canada ULC	Alberta
Pro-Tech Valve Sales-Inc.	Alberta
Forum Canada ULC	Alberta
Global Heat Transfer ULC	Alberta

As of December 31, 2023, we had approximately 1,600 employees. Of our total employees, approximately 1,100 were in the U.S., 200 were in the United Kingdom, 100 were in Germany, 100 were in Canada and 100 were in other locations. FET is also subject to the reporting requirements under the UK’s *Modern Slavery Act 2015*.

## **2. Policies, Procedures and Governance**

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. FET is committed to conducting our business in a manner that respects the human rights and dignity of people and we expect our vendors, suppliers, and those we work with to share these same principles everywhere they operate. FET’s

approach to human rights has been developed based upon our desire to operate as a steward of those we serve and the below practices and policies act as the foundation of expectations concerning human rights at FET.

The Reporting Entities regularly review the policies, procedures and governance practices discussed in detail below, including those relating to forced labour and child labour.

#### **A. Code of Conduct**

FET has adopted a Code of Conduct that establishes the broad standards of business conduct that every employee, officer, director and others working on behalf of FET and its subsidiaries (including the Reporting Entities), including our suppliers, contractors and other partners, are expected to meet. These standards describe our responsibility to:

- foster a safe and healthy work environment;
- deal fairly with customers and other third parties;
- conduct international business properly;
- report misconduct; and
- protect employees from retaliation.

The Code of Conduct prohibits, among other things, the use of forced or involuntary labor, including child labor, and requires that those subject to the Code of Conduct comply with all applicable compensation laws and regulations.

FET is committed to conducting business in a manner that protects the health and safety of its employees, customers, business partners, community neighbors, and the environment. Therefore, FET employees are responsible for performing their activities in accordance with the requirements identified in any FET Health, Safety or Environmental Policy or Manual, or as set forth by their respective locations.

Employees, officers and directors are required to certify annually that they have read, understand and will comply with the Code of Conduct.

FET has zero tolerance for direct or indirect retaliation of any kind against individuals who, in good faith, raise questions, report concerns, or participate in investigations involving legal or ethical conduct, or violations of the Code of Conduct, including with respect to the use of forced or involuntary labor, including child labor.

#### **B. Human Rights Policy Statement and Supplier Code of Conduct**

We have adopted a Human Rights Policy Statement and Supplier Code of Conduct to memorialize our pledge to conduct our business with the highest ethical standards, foster a safe and healthy work environment, and demonstrate ethical behavior and respect for the human rights of our colleagues, individuals who are a part of our supply chain and throughout the communities in which we operate. The Human Rights Policy Statement and Supplier Code of Conduct applies to every employee, officer, director and others working on behalf of FET and its subsidiaries (including the Reporting Entities), including our suppliers, contractors and other partners.

Under the Human Rights Policy Statement and Supplier Code of Conduct, employees are expected to promptly report any concerns about compliance with laws, our Code of Conduct and other policies. We recognize our responsibilities with regard to:

- protecting the health, safety and security of our employees, wherever we work and without regard to age, gender, gender identity, gender expression, religion or other characteristics;
- complying with all applicable laws regarding slavery, human trafficking, child labour, freedom of speech, freedom of association, fair labor and employee privacy;
- providing a workplace free from harassment or unlawful discrimination;
- respecting, protecting and supporting the rights of women and minority groups;
- developing our employees potential, and affording them equal employment opportunity;
- providing formal and informal training sessions, both in-person and through online courses, on our Code of Conduct, which includes the themes set forth in the Human Rights Policy Statement and Supplier

Code of Conduct. We currently conduct in person training sessions regarding anti-corruption regulations, regularly holds leadership meetings to discuss the importance of guarding our Core Values and deploy on-line courses to employees on topics such as workplace safety, harassment and other similar topics;

- ensuring that our employees and property is secured and that we are taking the necessary actions to mitigate any potential risks relating thereto;
- providing fair and equitable wages and benefits in accordance with local laws;
- respecting the freedom of association and right to collective bargaining and trade unions;
- respecting the local communities in which we operate, including vulnerable, marginalized and indigenous groups;
- treating water as a fundamental human right; and
- selecting and working with suppliers, partners and subcontractors to promote alignment with the principles reflected in our Code of Conduct and Human Rights Policy Statement and Supplier Code of Conduct.

Our supplier on-boarding process under the Human Rights Policy Statement and Supplier Code of Conduct ensures that we are provided with the highest quality materials and level of customer service. We have implemented a risk based approach in order to ensure compliance with Forum's ethical standards. Such efforts ensure that our suppliers do not engage in unethical conduct. In addition to maintaining the highest level of integrity and conducting their business in accordance with both the letter and spirit of the law, we expect the following of our vendors:

- ***Human Rights and Respect for People:*** We expect our suppliers to share our commitment to being attentive to the human rights of others. Suppliers should not engage in human trafficking or modern slavery, use child labor or otherwise use forced, prison or compulsory labor, or source materials that directly or indirectly finance or benefit armed groups. Furthermore, suppliers should not tolerate discrimination, harassment or retaliation, and should provide a safe, secure and healthy work space.
- ***Gifts and Entertainment:*** FET expects that suppliers will not engage in any form of bribery to secure or retain business, and will act in accordance with all laws related to bribery and conflicts of interest, including the U.S. Foreign Corrupt Practices Act, and any other applicable anti-corruption laws. Under no circumstance should any gift or entertainment be offered, given, or provided to any FET employee or contractor, or any immediate family member of a FET employee or contractor, unless such gift or entertainment is not excessive in value and is consistent with customary business practices.
- ***Transparency:*** We expect the highest level of transparency from our vendors. FET may from time to time audit its suppliers or otherwise objectively verify that suppliers are in compliance with our Human Rights Policy Statement and Supplier Code of Conduct.

All FET employees and management, including those of all Reporting Entities, shall be educated on human trafficking and slavery. The Human Rights Policy Statement and Supplier Code of Conduct is reviewed annually.

### **3. Due Diligence**

As part of its due diligence processes and in addition to the Human Rights Policy Statement and Supplier Code of Conduct, we are regularly embedding responsible business conduct into our policies, procedures and governance. We are continuously identifying and assessing adverse impacts in our supply chain and relationships with our suppliers, vendors and others in our supply chain. We utilize third-party services to screen each of our vendors and customers against all international watch lists and restricted party lists to flag any known allegation of law. Our Trade Compliance and/or Legal departments review any red flags identified in our due diligence processes in order to determine if a given business relationship can proceed.

### **4. Areas of Risk and Remediation Measures**

We have identified parts of our activities and supply chains that have the potential to carry a risk of forced labour or child labour and will continue to strive to identify any emerging risks. In particular, we focus on: the sectors in which we operate; the types of products we source, produce and sell; the locations of our activities and operations; and the use of outsourced, contracted or subcontracted labour.

The Reporting Entities have not identified any instances of forced labour or child labour in their supply chains. No situations have arisen requiring implementation of any remediation measures, including the remediation of loss of income.

**5. Attestation**

This Report was approved by the board of directors of each of GT, GHT, Pro-Tech and Forum Canada pursuant to section 11(4)(b)(i) of the Act on May 30, 2024.

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 applicable 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.

Signed "Adam Werner"  
**Adam Werner**  
Director, GT Coil Tubing of Canada ULC  
I have the authority to bind GT Coil Tubing of Canada  
May 30, 2024

Signed "Adam Werner"  
**Adam Werner**  
Director, Global Heat Transfer ULC  
I have the authority to bind Global Heat Transfer ULC  
May 30, 2024

Signed "Adam Werner"  
**Adam Werner**  
Director, Pro-Tech Valve Sales-Inc.  
I have the authority to bind Pro-Tech Valve Sales-Inc.  
May 30, 2024

Signed "Adam Werner"  
**Adam Werner**  
Director, Forum Canada ULC  
I have the authority to bind Forum Canada ULC  
May 30, 2024