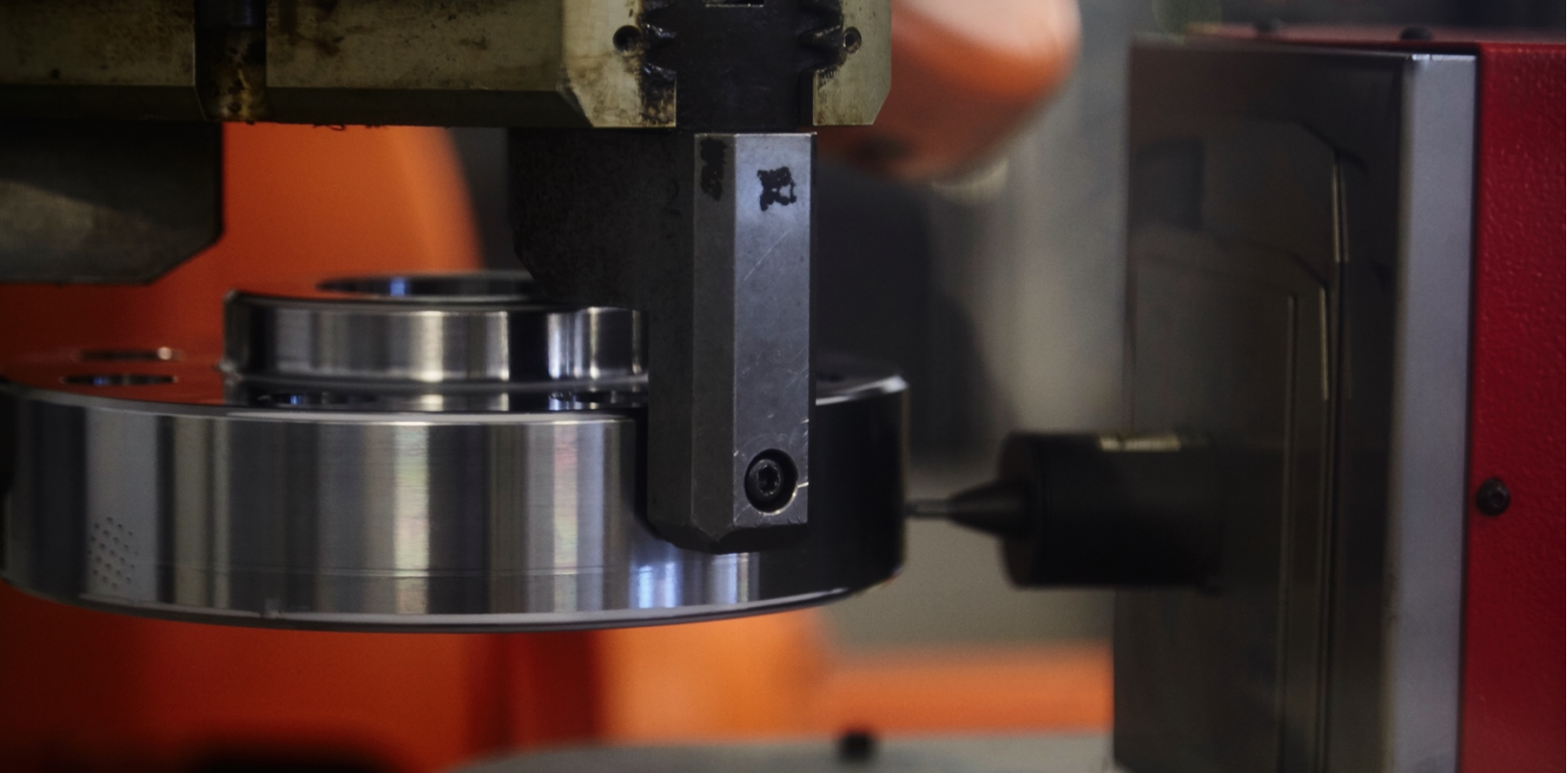


# Forced Labour and Child Labour Report

February 1, 2023 – January 31, 2024





## **Company Structure, Activities and Supply Chains**

This report covers the entities Manluk Industries Inc. and its subsidiaries, Manluk Industries (2008) Inc., and Manluk Mining Inc., collectively referred to as “Manluk”.

Manluk is a privately owned business located in Wetaskiwin, Alberta. Our company specializes in providing turnkey manufacturing solutions for the oil and gas industry. We currently support various sectors, including onshore and offshore drilling, wellhead downhole tools and mining. Manluk is dedicated to upholding ethical and legal standards in our operations, where we commit to ensuring safety, environmental stewardship and are socially responsible in all aspects of our business. The success of our business relies on the dedication and commitment of our workforce, which consists of over 200 employees across all business entities.

To ensure continued success and growth, Manluk counts on a supplier base committed to providing quality materials, goods, and products from various regions, including North America, Europe, and Asia.

## **Policies and Due Diligence Processes**

Manluk requires its suppliers providing materials, goods, and products to our operations to comply with all applicable laws, rules, codes, directives, and regulations. Inclusive of laws concerning anti-corruption, anti-bribery, human rights, labour rights, fair working conditions, anti-slavery, and human trafficking, as well as forced and child labour laws. Compliance must align with the established standards we uphold.



Our suppliers are required to conduct their business in an ethical standard that, at minimum, meets the following guidelines:

- Adhere to applicable local, national, and international laws and regulations.
- Conduct all business interactions with integrity, honesty, and transparency.
- Prevent conflicts of interest or potential conflicts of interest by refraining from business dealings where personal interest, the acceptance of gifts/assets, or biased opinion may influence business decisions.

All business records should maintain accuracy, legibility, and transparency to ensure that no omitting or falsifying entries are made, and all communication is free from misrepresentation and misleading information.

Suppliers are also required to treat all staff with dignity and respect, uphold the human rights of their employees, and abstain from any form of human rights abuse. Furthermore, suppliers must ensure a safe and respectful workplace for everyone by adhering to the following guidelines:

- Employees are treated with dignity and respect.
- Prevent the exploitation of workers by ensuring all labour is voluntary, with no use of forced, bonded, involuntary, trafficked or child labour, or any other form of modern slavery.
- Zero-tolerance for discrimination, harassment, mental or physical pressures, or any other form of abuse within the workplace.
- Ensure respectful work practices are implemented where no employee is subject to any threatening behavior such as verbal, written, physical, sexual, and psychological, or otherwise.







- Maintain a safe work environment that meets the required health and safety standards, laws, and regulations to minimize the risk of work-related accidents, incidents, hazards, and occupational illness.
- Hiring practices are in accordance with the required labour laws where employees are.
  - Paid fair wages in accordance with minimum wage and overtime regulations.
  - Given working hours that are within the hours of work and rest as set out in the applicable labour laws.
  - Are of legal working age.
- Ensure employees have a process to report unethical behavior and or violations where no retaliation shall be taken against the employee reporting such instances.

Suppliers are required to carry out regular reviews to ensure their compliance with the above guidelines. In the event of non-compliance, Manluk is to be notified and further action may be taken.

The above information is gathered by way of annual supplier reviews as part of Manluk's audited management system. Manluk suppliers are currently evaluated at minimum annually, utilizing risk-based thinking prior to being added to the company approved vendor list. Any risks or non-compliance to the applicable policies, laws, rules, codes, directives, and regulations identified shall be escalated for further investigation by Manluk.





## **Forced Labour and Child Labour Risks**

Our company has not yet begun the process of identifying risks of modern slavery within its supply chain. However, our intention is to identify any risks within our supply chain through various audits and comprehensive questionnaires to all current and future suppliers. Audits and questionnaires are to be rolled out throughout 2024. This approach aims to identify any potential risks of modern slavery or forced labour. With cooperation from our suppliers and industry partners, we will be able to identify and investigate any potential human rights impacts.

## **Remediation and Remediation of Loss of Income**

As stated above, Manluk has not yet taken steps to identify any forced or child labour risks, therefore no remediation measures have been implemented.

## **Training**

Manluk has formulated a training program that includes company policies, procedures, and comprehensive information regarding labor standards. However, we currently do not have training specific to forced or child labor. Training specific to these issues is currently being developed and will be rolled out throughout 2024. Additionally, employees are evaluated to assess their understanding of the company policies and requirements. Ongoing training is provided through various methods, including classroom sessions, toolbox talks, and written communications.

## **Assessing Effectiveness**

This report outlines the approach and initiatives by Manluk is taking to identify and mediate any risks of modern slavery within its business operations and supply chains. At Manluk, we believe that by working closely with our employees, suppliers, and partners, and by clearly communicating and rigorously monitoring the requirements, we can effectively eliminate forced labour and child labour from our supply chain. We enforce a zero-tolerance approach to all forms of modern slavery, including slavery, servitude, human trafficking, forced labour, and child labour. This standard applies to all our business dealings and will not be tolerated or condoned under any circumstances. Our comprehensive training programs, regular audits, and proactive collaboration ensure adherence to the highest labour standards, creating a supply chain free from modern slavery.





## Senior Management Attestation

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 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, for the reporting year listed above.

Frank Luebke

President

May 30, 2024

I have the authority to bind Manluk Industries.

