



Modern Slavery Report

Introduction:

This report is made by Steelhaus Holdings Inc. and its subsidiaries Steelhaus Technologies Inc. and Steelhaus Technologies Canada Limited (collectively “Steelhaus”) in accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Supply Chains Act”) for the financial year commencing on January 1, 2023, and ending on December 31, 2023.

At Steelhaus, we are committed to acting ethically and with integrity in all our business dealings and relationships, promoting compliance with applicable laws and protecting the dignity and rights of all people connected to our business. We strive to work ever more closely with our suppliers to ensure their workforce and the workforce of their supply chains are treated with respect and dignity.

This is Steelhaus's first report under the Supply Chains Act. We recognize that stamping out modern slavery and modern slavery risks is a process that will take time. Our report outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery, including forced labour and child labour, in our business and supply chain.

Our Organisational Structure:

Steelhaus is a global leader in innovative energy solutions, providing products and services to oil and gas industries. Steelhaus Holdings Inc. is the parent company of 11 subsidiaries, including Steelhaus Technologies Inc. and Steelhaus Technologies Canada Limited, specializing in energy-related manufacturing, distribution, and technology solutions.

Our Operations:

Steelhaus boldly drives the market with practical field-proven experience, adaptable engineering, integrated manufacturing, and uncompromising safety with relentless delivery of unwavering customer service. We employ over 500 people and have operations worldwide. For more information about Steelhaus's operations, please visit [Steelhaus Technology Inc | Get Ahead in the Oil & Gas Industry \(steelhausinc.com\)](https://www.steelhausinc.com)

Our Supply Chains:

Our supply chain includes a global network of suppliers from Canada, the United States, and Asia. We source raw materials, components, and ancillary services like transportation and logistics. Key raw materials include steel, electronic components, and plastics.

Modern Slavery Risk Profile:

All our employees are located in Canada, where they are protected under fair and responsible employment practices. That being said, we recognize that certain risks may exist within our supply chains.

**Risk Factors in our Supply Chains Include:**

Sectors of Operation: Manufacturing and oil field services.

Geographical Regions: Primarily trusted local suppliers, with occasional international sourcing.

Actions Taken to Combat Slavery Risks:

Policies and Procedures: Steelhaus has a comprehensive Child and Forced Labour Policy in place.

Employee Training: Employees receive training on identifying and reporting modern slavery and human trafficking risks.

Our Policies on Modern Slavery:

Steelhaus's Child and Forced Labour Policy outlines our commitment to preventing and addressing child labour and forced labour within our organization and supply chain. Some key highlights of our policy include:

Minimum Employment Age:

Adherence to Alberta's Employment Standards Code and federal regulations regarding the minimum age for employment. No individual under the age of 15 will be employed due to the nature of the work.

Protection of Young Workers:

Additional protections are provided for individuals under the age of 18 to ensure they are not subjected to hazardous work conditions, excessive working hours, or exploitation.

Forced Labour Prohibition:

We prohibit all forms of forced labour within our organization and supply chain, including debt bondage, human trafficking, slavery, and involuntary servitude.

Supply Chain Responsibility:

Steelhaus expects its suppliers, contractors, and business partners to share its commitment to ethical labour practices and comply with all applicable laws and regulations regarding child and forced labour.

Additionally, our Code of Business Conduct and Ethics reinforces our commitment to:

Build Trust and Credibility:

Adhering to commitments, displaying honesty and integrity, and reaching company goals through honourable conduct.

Respect for the Individual:

Creating an environment where employees are treated with dignity and respect.

Set the Tone at the Top:



Management demonstrating ethical behaviour through actions and fostering an open and supportive environment.

Uphold the Law:

Understanding and complying with company policies, laws, rules, and regulations.

Due Diligence Processes:

Steelhaus enforces a strict code of compliance and does not tolerate slavery or human trafficking within its supply chains. We continually review and improve our approach to supplier due diligence to enhance our action plan against modern slavery risks.

Steelhaus expects its suppliers, contractors, and business partners to share its commitment to ethical labour practices and comply with all applicable laws and regulations regarding child and forced labour. We reserve the right to conduct additional verifications and audits to ensure adherence to our standards, as well as the right to terminate our relationship with any supplier that engages in modern slavery. We encourage all employees to report any suspected violation of our Child and Forced Labour Policy or our Code of Business Conduct and Ethics to our HR department in confidence.

Remediation Measures:

No instances of modern slavery or human trafficking have been identified within Steelhaus's business and supply chains.

Training and Awareness:

We are currently developing training to ensure our employees are aware and capable of recognizing and reporting the risks of modern slavery and human trafficking. Training will be incorporated into employee onboarding materials.

Effectiveness in Combatting Modern Slavery Risks:

Steelhaus does not currently assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our operations and supply chain. As we explore and implement further measures to prevent and mitigate modern slavery risks in our operations and supply chains, we will monitor and review performance to assess the effectiveness of any actions taken.

Approval of the Report:

This report was approved by the Board of Directors of Steelhaus pursuant to Paragraph 11(4)(b)(ii) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act on May 30, 2024.

A handwritten signature in black ink, appearing to read 'Mike George', is positioned above the printed name.

Mike George
CEO

Date: May 30, 2024