



# S-211 2023 ANNUAL REPORT

**TIER 1 ENERGY SOLUTIONS, INC**

4253 97 Street NW

Edmonton, Alberta

T6E 5Y7

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## Tier 1 Energy Solutions, Inc. S-211 2023 Annual Report

### 1.0 Company Information

Legal Name	Tier 1 Energy Solutions, Inc.
Financial Reporting Year	December 31, 2023
Identification of a Revised Report	No
Business Number	833777634
Identification of Reporting Obligations in other Jurisdictions	No
Sector/Industry	Mining, quarrying, and oil and gas extraction Other: Oil field Services
Location	Alberta, Canada

### 2.0 Policy

Tier 1 Energy Solutions, Inc. (Tier 1) is committed to protecting individuals from the exploitation of illegal labour practices, such as child labour and forced labour. Such practices are not tolerated by Tier 1 and are strictly prohibited in all forms. Tier 1 attests that no person is required to provide Forced Labour or service in our business organization.

Tier 1 holds itself accountable to the highest ethical standards and complies with and exceeds all relevant and applicable local and international laws about illegal labour practices. In doing so, Tier 1 never knowingly contracts with or carries on a business relationship with any organization or employer that does not adhere to the same standards or is in violation of any relevant or applicable labour laws.

### 3.0 Subsection 11 (1) Requirements

Tier 1 has taken the following steps to reduce the risk of forced labour or child labour in the production of goods used or imported into Canada for the company.

1. Grievance Mechanism: Implementation of a confidential Employee Whistleblower Email
2. Dispersion of a companywide confidential Pulse Survey
3. Comprehensive Onboarding Process: Employee Handbook given to and available to every Tier 1 employee which outlines company rules, policies, and procedures in accordance with all provincial laws. The onboarding process has been updated to ensure increased awareness of Tier 1's stance on forced and child labour.
4. Development of an Anti-Slavery Policy in a subsidiary.

### 4.0 Subsection 11 (3) Requirements

#### a) Its structure, activities, and supply chains

Tier 1 is a corporation. Tier 1 sells goods in Canada and imports goods into Canada that are produced outside of Canada.

Tier 1 operates as a mid-sized service provider in the oil and gas industry, with a primary focus on enhancing well performance and completions. The company is structured with a robust management team overseeing various operational units, including engineering, field services, safety, and compliance. It operates both domestically and internationally, leveraging a network of strategically located facilities to support its field operations. Tier 1 offers a comprehensive range of services, including well logging and perforating, and completion tool services. The company's core activities revolve around providing high-quality, reliable solutions designed to increase the efficiency and safety of in the completion of oil and gas wells.

The supply chain of Tier 1 is multi-faceted and includes sourcing specialized equipment and technology from a global network of suppliers. Tier 1 maintains stringent quality control processes and collaborates closely with suppliers to ensure that all materials and equipment meet industry standards and regulatory requirements. The company emphasizes ethical sourcing and sustainability, implementing rigorous checks to mitigate risks associated with child and forced labour. Additionally, Tier 1 collaborates with logistics partners to ensure timely supply delivery to various operational sites, maintaining the efficiency and reliability of its service delivery. By maintaining a transparent and responsible supply chain, Tier 1 ensures that their operations not only adhere to regulatory standards but also contribute to the broader goals of sustainability and social responsibility in the energy sector.

#### b) Its policies and its due diligence processes in relation to forced labour and child labour.

Tier 1 implemented ethics documentation and training for management in 2023. The company embedded responsible business conduct into policies and management systems. If any adverse impacts were to be discovered in the supply chain and procurement process, those contracts would be ceased immediately with a plan to be developed to prevent and mitigate any future reoccurrence.

**c) The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.**

Tier 1 has begun the process of identifying the risks of forced or child labour within our supply chain. We have implemented strategic measures to continuously assess and manage risks, focusing on high-risk areas and improving our risk assessment processes.

**d) Any measures taken to remediate any forced labour or child labour.**

Tier 1 has not identified any forced or child labour in activities or supply chains in 2023.

**e) Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.**

Tier 1 has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced or child labour in our activities and supply chains.

**f) The training provided to employees on forced labour and child labour.**

Tier 1 provides all employees with the Employee Handbook which details company policies, procedures and standards that align with all government labour laws. This information is provided in the onboarding process and is made readily available to all employees.

**g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

Tier 1 conducts regular reviews of our policies and procedures related to forced and child labour. The company collaborates with suppliers to measure the effectiveness of their actions to identify any forced or child labour by means of tracking performance indicators. Tier 1 has a Company Code of Business Conduct and Ethics which includes the Company Mission Statement and Values, Business Principles, Labour and Human Rights alignment, Legal Compliance, and the steps taken for any fraud or corruption identified.


## 5.0 S-211 Action Plan for 2024

Tier 1 plans to complete the following action items for 2024:

1. Implementation of Child and Forced Labour Policy
  - The Child and Forced Labour Policy will be authorized by the CEO, made readily available to all employees, added to the Employee Handbook, and given to all vendors and suppliers of Tier 1.
2. Prepare Supplier List and Related Country of Operation
  - Tier 1 will gather a list of all suppliers which include their regions of origin, goods supplied to Tier 1, and services provided.
3. Development of Supplier Code of Conduct and Declaration
  - The Supplier Code of Conduct and Declaration will outline the requirements for suppliers/vendors of Tier 1 in relation to the expectation of no child or forced labour practices. The supplier completed code of conduct and declaration will be kept on file and reviewed annually.
4. Management training on S-211 Policy requirements and Initiatives.
5. Summary of S-211 compliance and initiatives detailed in the annual ESG report.

## 6.0 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 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 aspects for the purposes of the Act, for the reporting year listed above.

Full Name	Robert Sutherland
Title	Chief Executive Officer (CEO)
Date	May 30, 2024
Signature	 <i>I have the authority to bind Tier 1 Energy Holdings</i>