



# Modern Slavery Report 2023

## TRIMARK TUBULARS LTD.

### 1. Introduction

*Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading Oil Country Tubular Goods (OCTG) and Line Pipe distributor to the Energy industry, TriMark recognizes the important role that we have in ensuring that our products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere or of goods imported into Canada.*

### 2. Our Business

*TriMark is a major stocking distributor for OCTG and Line Pipe products to the Energy industry with a focus on the Western Canadian Sedimentary oil and gas basin headquartered in Calgary, Alberta, Canada. We have stock located throughout Western Canada in BC, Alberta, Saskatchewan, Canada. TriMark's supply chain includes businesses that supply goods and services to our organization, including VoestAlpine Tubulars (Austria), Vallourec Tubes (Brazil/USA), Evraz NA (Canada), US Steel (USA), Borusan Mannesmann (Turkey, via IMCO International), TPCO (China, via IMEX Canada Inc.), Hunting Canada (Canada), Perma-Pipe Canada (Canada).*

### 3. Our Policies

*Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, 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, forced or bonded labour in any of our operations or by*



suppliers working for us. We make every effort, including through carrying our due diligence and audits to monitor the performance of our suppliers, to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

#### **Business Code of Conduct**

We are committed to conducting our business in a lawful and ethical manner. Our Business Code of Conduct (the “Code”) is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, TriMark employees should always act lawfully, ethically and in the best interests of TriMark.

#### **Human Rights & Modern Slavery Policy**

TriMark is committed to conducting business in a transparent and ethical manner in accordance with human rights principles. We adhere to the following standards that our employees and suppliers are treated with dignity, fairness, equality, respect and independence. We reject any type of discrimination or harassment based on race, age, religion, sex, or any other characteristic protected by applicable laws.

#### **Supplier Certification**

TriMark’s Supplier Certification details the requirements and expectations we have of our suppliers, their supply chains. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Certification in their own operations and supply chain. We engage with suppliers that are committed to these same principles and suppliers commit to these standards as a condition of doing business with us. We review our Supplier Certification on an annual basis to ensure that this policy is in line with current best practices.

#### **Whistleblower Policy**

TriMark has a whistleblower policy in place to protect the officers and employees who report and/or participate in the investigation of compliance issues.

#### **Due Diligence**

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.

## 4. Assessing Our Risk

TriMark engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we request Supplier Certifications. Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories such as manufacturing, and promotional goods suppliers.

## 5. Our Commitments

### **Steps to Prevent and Reduce Risks of Forced and Child Labour**

*TriMark recognizes that modern slavery may impact our business activities and we endeavor to take responsibility for reducing the risk that we might contribute to modern slavery through our supply chains. We are committed to strongly opposing the use of forced labour and child labour throughout our supply chains. To understand the risk in our supply chain annual questionnaires are sent to our suppliers for information on their policies, practices and procedures related to preventing and reducing modern slavery in their work and supply chain. We will work with suppliers of high risk to ensure it is mitigated.*

### **Remediation Measures**

*Our Business Code of Conduct and our Whistleblower Policy require all employees and contract workers of TriMark to report actual or possible misconduct. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business. If we discover any forced labour or child labour in our business and supply chains, we will suspend or terminate deliveries from the supplier until further investigation can be completed.*

### **Training**

*Every year, TriMark personnel at all levels are required to complete a mandatory compliance certification process to ensure that our Business Code of Conduct is understood and properly applied to our daily activities. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.*

## 6. Our Progress and Effectiveness

*As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date no significant concerns or complaints have been identified.*

*We have selected certain key performance indicators (KPIs) with respect to human rights, including forced labour and child labour, and such KPIs are reviewed by Trimark's senior leadership team on an annual basis. Any non-conformances identified are dealt with by the appropriate teams. Support is provided to suppliers where necessary to resolve any issues raised.*



## 7. Approval & Signature

This Report was approved by TriMark's Board of Directors on May 30, 2024, pursuant to paragraph 11(4)(a) or subparagraph 11(4)(b)(i) or (ii) and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada.

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 listed above. Based on my knowledge, and having exercised reasonable diligence, I attest 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.

I have the authority to bind TriMark.

A handwritten signature in blue ink that reads 'David Bailey'.

**David Bailey**  
**Chief Financial Officer, May 30, 2024**