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Name: Trican Well Service Ltd.  
Reporting Year: 2023  
Entity Category: TSX Publicly Listed Corporation  
Industry/Sector: Oil and Gas Services  
Location: 2900, 645 – 7<sup>th</sup> Ave SW, Calgary AB.

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Trican Well Service Ltd. (**Trican**), a Canadian issuer, submits this report (the **Report**) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023* (also known as the “**Modern Slavery Act**”). The Report covers the period beginning January 1, 2023, and ending December 31, 2023, and relates to Trican’s operations in Canada.

### **ENTITY DESCRIPTION – STRUCTURE AND OPERATIONS**

Trican Well Service Ltd. is incorporated in Alberta and headquartered in Calgary. Trican is listed on the Toronto Stock Exchange with the ticker “TCW”.

Trican supplies oil and natural gas servicing equipment and solutions to its customers through the drilling, completion, and production cycles. Our team of technical experts provide state-of-the-art equipment, engineering support, reservoir expertise and laboratory services through the delivery of hydraulic fracturing, cementing, coiled tubing, nitrogen services and chemical sales for the oil and gas industry in Western Canada. Trican is the largest pressure pumping service company in Canada. Currently, Trican does not have any operations outside Canada.

### **STEPS TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR IN 2023**

In summary, Trican introduced and implemented the following measures during the reporting period to prevent and reduce the risks of forced labour and child labour in our supply chain:

- Adopted and implemented a corporate policy on forced labour and child labour in supply chains,
- Introduced and implemented an Annual Supplier Compliance and Certification process,
- Developed and introduced anti-forced labour and anti-child labour contractual clauses, and
- Met with relevant employees to review and sensitize them on the requirements of the Modern Slavery Act.

The above initiatives are discussed in this Report.

## SUPPLY CHAINS

Our supply chain activities are predominantly located in North America with over 99% of Supply Chain spend sourced from suppliers within North America. Supply Chain inputs include proppants, chemicals, equipment and parts sourced from entities operating within the United States of America or Canada.

## POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

### Policies

Pursuant to the enactment of the Modern Slavery Act, Trican implemented a policy on [Forced Labour and Child Labour](#) (the “**Policy**”). Amongst other things, the Policy states that Trican is opposed to all forms of forced labour and child labour in its supply chain activities and will use its best endeavours through its due diligence process and supplier reporting requirements to ensure that forced labour and child labour are avoided in the supply of goods and services that Trican procures from its suppliers or that it provides to its customers.

The objective of the Policy is:

*“to ensure that Trican has adequate procedures in place to manage the risk of the use of forced labour and child labour in its supply chain and can demonstrate compliance with the Modern Slavery Act.”*

The key principles of the Policy are:

- Due Diligence,
- Training,
- Compliance Statements in Contracts and Agreements and
- Enforcing Compliance.

In addition to the Policy, the following policies guide Trican’s commitment to ensuring ethical and responsible business conduct:

Policy	Overview	Scope
Code of Ethics & Professional Conduct (the “ <b>Code</b> ”)	The Code requires persons acting on behalf of Trican to act with honesty, integrity, and fairness in every dealing for and on behalf of Trican and to conduct Trican’s business in compliance with laws, rules, regulations, and other legal requirements applicable to our business operations.	The Code extends to all directors, officers, employees, contractors, agents, and other Trican representatives when engaged in Trican business.
<a href="#">Anti-Corruption Policy</a>	Trican’s Anti-Corruption Policy states Trican’s commitment to	The Anti-Corruption Policy applies to the board of directors,

	upholding and complying with anti-bribery and anti-money laundering laws in the jurisdictions in which we operate.	employees, agents, contractors, and all persons who act for and on behalf of Trican.
Violence, Harassment & Discrimination Policy	This policy outlines the behavioural expectations of all employees and communicates Trican's commitment to prevent threats of violence and harassment, including sexual harassment and discrimination against employees. All reports of alleged violence, harassment, and/or discrimination are promptly investigated by a Trican official or an external investigator and corrective actions are taken.	The policy applies to all Trican employees in all areas where we conduct business.
Whistleblower Policy	The Whistleblower Policy is a statement of Trican's commitment to ensuring that any wrongdoing by Trican or any of its employees, contractors, or suppliers is identified and reported confidentially and expeditiously investigated and remedied.	Our Whistleblower Policy applies to all employees, contractors, suppliers, and other stakeholders

Board Oversight

As part of its mandate, Trican's Corporate Governance Committee reviews all corporate policies and makes recommendations to the Board for approval. Specifically, the Corporate Governance Committee, amongst other things, (i) provides oversight on governance issues, including Trican's policies, standards, disclosures, and compliance practices, and (ii) reviews, monitors, and reports to the Board on actions and initiatives undertaken by Trican to manage and mitigate governance risks.

In this regard, Trican's Corporate Governance Committee has oversight responsibility for the Policy's approval, implementation, and periodic amendment.

At the executive level, our Chief Operating Officer is responsible for supervising the incorporation of the Policy into our supply chain processes and procedures, with legal support from our VP, Legal, General Counsel and Corporate Secretary.

Pursuant to our internal governance systems, the Policy will be periodically updated and submitted to the Corporate Governance Committee.

### Due Diligence

In the past year, Trican introduced an annual Supplier Certification of Compliance Form (the “Form”), which it administered to its suppliers starting in February 2024. The process requires all suppliers to respond to questions including (i) confirmation of their understanding of the requirements of the modern slavery laws applicable in Canada, (ii) adoption and implementation of the Modern Slavery Act within their business operations, and (iii) whether there has been an instance of modern slavery or forced labour in their supply chain over the past year. Upon completion, Trican requires suppliers to certify and return the completed Form. Trican reviews the responses received for non-compliance/exceptions, which are then reviewed with the supplier, including obtaining assurances on steps taken to address any non-conformance or exceptions.

For the 2023 reporting period, we issued the Form to 1,368 suppliers. Of this number, suppliers representing 86% of Trican’s supply chain spend were fully compliant with Trican’s Modern Slavery Policy. We expect the response rate to improve in subsequent years as the awareness around the Modern Slavery Act increases, and we have the benefit of a full year to engage our suppliers.

Trican did not identify any instances of non-compliance or the presence of forced labour and child labour in any of the responses received from its suppliers for the reporting period.

### Introduction of anti-forced labour and anti-child labour contractual clauses

Trican has developed contractual language, which we have started introducing into agreements and contracts with counterparties. Trican’s Standard Terms and Conditions are being updated to incorporate a clause on anti-forced labour and anti-child labour.

## **PARTS OF TRICAN’S BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR OR CHILD LABOUR AND MITIGATION AND REMEDIATION MEASURES**

Based on current assessments, Trican has not identified any parts of its business or supply chains that carry a risk of forced labour and/or child labour. Given that over 99% of our suppliers are in North America, we view Trican’s overall exposure to the risk of forced labour and child labour to be minimal. However, Trican will continually monitor this exposure through its due diligence and annual supplier certification process.

Trican’s Whistleblower Policy, which provides an Ethics Hotline, administered by an independent third party, is a mechanism for identifying, mitigating, and remediating risks, including forced labour and child labour risks. Trican encourages its employees, contractors, suppliers, and other stakeholders to voice any concerns regarding our business conduct by using the Ethics Hotline or by mail (or other means of delivery) addressed to the Chair of the Audit Committee.

### **TRAINING ON FORCED LABOUR AND CHILD LABOUR**

Subsequent to the introduction of the Modern Slavery Act, Trican’s Legal Department organized sessions with relevant employees to introduce them to the new law, its requirements and implementation within our business. The presentation was delivered to mid-level and senior-level employees, including the Director of Supply Chain, the Logistics and Transportation Manager and the Fleet Maintenance Manager.

MODERN SLAVERY ACT  
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The presentation slides were developed internally and covered the provisions of the Modern Slavery Act.

**ASSESSMENT OF EFFECTIVENESS OF IMPLEMENTATION MEASURES**

Given that the Modern Slavery Act is in its first year, the effectiveness of the implementation measures introduced by Trican will be assessed in subsequent years.

**APPROVAL AND ATTESTATION**

Approval

The Board of Trican approved this report pursuant to section 11(4)(a) of the Modern Slavery Act.

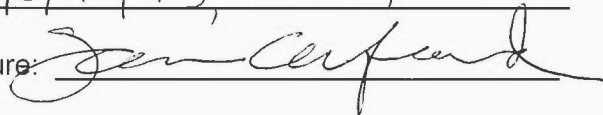
Attestation

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 Trican Well Service Ltd. 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.

Name: THOMAS M. ALFORD

Title: BOARD CHAIR

Date: MAY 13, 2024

Signature: 

I have the authority to bind Trican Well Service Ltd.