



Triple-S Tube Supply ULC (dba Tube Supply)

RE: S-211 Fighting Against Forced Labour in Supply Chains Act

Report for FY 2023

Period: September 1, 2022 – August 31, 2023

Introduction and Steps Taken

Tube Supply recognizes the importance of ethical sourcing and responsible business practices. The fiscal year 2023 marked a significant period as we navigated through various challenges and opportunities in the supply chain landscape. Though we consider the risk of forced labor or child labor in our supply chain to be low, we are committed to continuous monitoring and reporting for full transparency with our partners. This report addresses our efforts in alignment with the provisions of Bill S-211.

For this initial report, we make note that our last fiscal year ended August 31, 2023, just 3 months after Canadian Parliament made the announcement regarding the passage of Bill S-211. In this short period of time, our policies and procedures did not change to specifically address the Bill. Steps have been taken since that time and implemented after the fiscal year end, all of which will be detailed in the report for FY 2024 that will be submitted next year.

Our Business, Structure and Supply Chain

Triple-S Tube Supply ULC (dba Tube Supply) based in Edmonton, AB is a wholly owned subsidiary of Triple-S Tube Supply, LP (dba Tube Supply) based out of Houston, TX.

Tube Supply is a global distributor of steel bar and tube, currently operating out of 5 facilities located in Texas, Louisiana, Canada and Dubai. We provide high quality alloy, stainless, chrome, aluminum and carbon steel products for the oil and gas industry. Our steel products are sourced globally and tailored specifically to meet the demands of the oil and gas industry, including high pressure, high temperature (HPHT) and sour (H₂S) well environments. Our clients are leading oil and gas service companies, OEMs, and manufacturing centers. Our Houston, Lafayette, Edmonton & Dubai locations have all received ISO 9001:2015 certifications, and our Houston & Edmonton locations have also been certified as compliant to API 20J standards. We have a robust Quality Management System in place to achieve these goals and continue to provide quality products to the marketplace.

Triple-S Tube Supply ULC has just one facility in Canada (Edmonton, AB) which employs a number below the 250 minimum employee threshold noted in Bill S-211. However, we do meet the other two criteria required for reporting (total revenue and assets) for the last fiscal year.

In regards to our Supply Chain specifically, we have a centralized purchasing department based out of Houston, which manages all supplier relationships and purchases of goods for our facilities worldwide (including the Canadian branch in Edmonton). We take great pride in our long-term strategic partnerships with a smaller, select group of suppliers. These are industry leaders with strong reputations in the market, operating with reliable, ethical business practices. Our suppliers are based primarily in the US, Canada, Mexico, Europe, and South Korea. Many of these are operating under Union contracts, which is another safeguard for our supply chain to ensure fair working conditions and mitigate any risk of labor exploitation.

Policies and Due Diligence

Tube Supply has already established processes to identify, prevent, and mitigate risks within our supply chain. This process involves thorough assessments of suppliers during the onboarding process, as well as audits, questionnaires, and on-site visits. Though we did not have policies specifically targeted at mitigating child or forced labor in place as of the end of the last fiscal year, this has since been addressed and included. It will be detailed on the next report for FY 2024.

Risk Assessment, Monitoring and Remediation

Our Supply Chain and Quality teams work together closely to monitor and assess risk with all suppliers. Tube Supply conducts risk assessments across our supply chain to identify high-risk areas and prioritize action plans accordingly. Continuous monitoring mechanisms are in place to track and evaluate supplier performance and compliance. All main suppliers are required to complete quality questionnaires in addition to on-site audits performed by Tube Supply and/or its subcontractors. Further, these suppliers are required to notify us of any changes to their operations and/or sourcing practices throughout the year, reporting via our QFM-10-EXT Vendor Management of Change Form.

Tube Supply has reviewed and audited all main suppliers as required to maintain our API 20J certification. During these audits, we have personnel on site not only to ensure the quality control of the steel goods we purchase, but also to witness and assess the mill conditions. Any concerns for working conditions will be noted as part of the audit.

The steel products that we import and distribute are NOT included in the List of Goods Produced by Child Labor or Forced Labor published by the Bureau of International Labor Affairs (ILAB) as of the date of this report. We recognize the importance of continuous monitoring, though we deem our products and supply chain as low risk for child or forced labor.

As of this report, we have not identified forced labor or child labor in our supply chain, and therefore have not needed to take any measures for remediation.

Supplier Engagement, Collaboration and Training

We have actively engaged with our suppliers to raise awareness of the requirements set forth by Bill S-211 and to promote responsible sourcing practices, which will be detailed in the 2024 Report. Collaboration initiatives include regular communication channels to address any concerns or issues. Many of our suppliers are also required to report under S-211 or similar legislation from other countries, and therefore have robust policies and procedures already in place regarding fair labor practices.

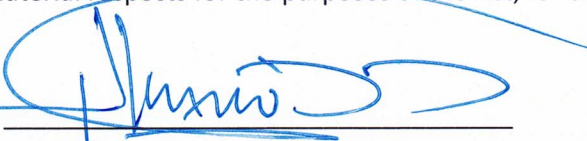
We have not implemented any company-wide training specifically related to this Bill as of the end of fiscal year 2023.

Conclusion

Tube Supply remains committed to upholding the principles of ethical sourcing, human rights, and social responsibility. Though we do not have specific policies in place to assess the effectiveness of our efforts, we will continue to look out for any risk for forced labor and child labor from our supply chain and work together to contribute to a more sustainable and equitable future through ethical sourcing practices. All other steps that we have taken since the Act was passed will be detailed in our 2024 FY report covering the period from 9/1/2023 – 8/31/2024.

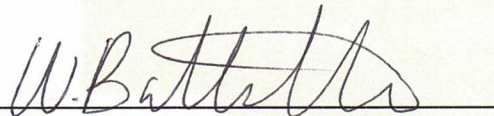
Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (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 respects for the purposes of the Act, for the reporting year listed.

X 

Alvaro Dominguez
President

5-31-2024

X 

Whitney Battarbee
Supply Chain Manager

5-31-2024