

UNITED SAFETY LTD.

Modern Slavery Report 2023

Published: May 23, 2024

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Introduction

This annual report (the “**Report**”) describes the actions taken by United Safety Ltd. (“**USL**” or the “**Corporation**”) from January 1, 2023 to December 31, 2023. The Report has been prepared in compliance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”). Terms used in this Report and not otherwise defined shall have the meaning ascribed thereto in the Act, unless the context otherwise requires. Section references used herein are also to the Act.

Background on USL [section 11(3)(a)]

USL provides industrial safety products, safety consulting and safety training to ensure that the workforce and public remain safe. Based in Airdrie, Alberta, the Corporation has global operations with a focus on North America, Europe and the Middle East. USL services both the upstream and downstream sectors of the oil & gas industry, offering plant turnaround safety services; safety Solutions for onshore/offshore drilling and well servicing activities; integrated risk management services; safety technician services; and construction projects safety services.

The Corporation purchase a broad range of materials and components in connection with its business activities. Some of the components used in USL’s products and services are obtained from a single source or a limited group of suppliers and the Corporation has long-standing relationships with recognized and reputable suppliers. Supply chain teams within USL operate regionally, adapting their approach based on local demands and business practices. In 2023, the majority of goods and services procured by the Corporation were sourced from the United States or Canada.

The Corporation is incorporated pursuant to the *Business Corporations Act* (Alberta), and its financial year end is December 31.

What steps have the Corporation taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Corporation or of goods imported into Canada by the Corporation? [section 11(1)]

- Developing and implementing an action plan for addressing forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains
- Monitoring suppliers
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on force labour and/or child labour

USL is committed to conducting business to the highest standards of ethical business practice and conduct.

The Corporation has adopted a Code of Business Conduct (the “Code”) which emphasizes this commitment to providing a fair and healthy work environment and to ensure compliance with all applicable anti-human trafficking and anti-slavery laws. The Code was approved by the USL board of directors (the “Board”) and has been communicated to the employees of the Corporation.

Does the Corporation currently have policies and due diligence processes in place related to forced labour and/or child labour [section 11(1)]

- Embedding responsible business conduct into policies and management systems

As mentioned above, the Code was approved by the Board. Within the Code is the Anti-Human Trafficking and Anti-Slavery Policy, the purpose of which is to ensure that human trafficking does not occur in any form within the Corporation, and that none of USL’s business systems are associated with forced labour or child labour.

Has the Corporation identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? [section 11(3)(c)]

No; USL has not yet started the process of identifying risks.

Has the Corporation taken any measures to remediate any forced labour or child labour in its activities and supply chains? [section 11(3)(d)]

No; USL has not identified any forced labour or child labour in its activities and supply chains.

Has the Corporation taken any measures 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? [section 11(3)(e)]

No; USL has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in their activities and supply chains.

Does the Corporation currently provide training to employees on forced labour and/or child labour? [section 11(3)(f)]

No. All new employees and independent contractors providing services to the Corporation are provided with access to the Code and are required to acknowledge that they have read it and understand its contents. The Code training is designed to ensure that personnel are aware of USL’s standards of ethical business practice and expectations regarding ethical conduct. Additional training is voluntary and conducted online via a portal containing content provided by the Corporation.

Does the Corporation currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? [section 11(3)(g)]

No.

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 or entities 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 above.



Lee Whittaker
President and CEO, Director

May 23, 2024

I have the authority to bind United Safety Ltd.