



YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.

Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

Yellowstone Pipe Flange & Fitting Ltd.

Fighting Against Forced Labour and Child Labour in Supply Chains Report **Year ended September 30, 2023**

Pursuant to subsection 11(2) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C., 2023, c. 9 (the "Act"), this report is made jointly by Yellowstone Pipe, Flange and Fitting Ltd. (herein 'Yellowstone') and the entities listed in Schedule "A" that it controls. Yellowstone. is headquartered in Sherwood Park, Alberta and is a privately controlled corporation. As required by the Act, this report presents our forced labour and child labour reporting statement for the financial year ending September 30, 2023. It summarizes the actions taken to prevent and reduce the risk that forced labour and child labour is used at any step of the production of goods in Canada by Yellowstone or of goods imported into Canada by Yellowstone. Where this report refers to "Yellowstone", the "Company", "we," "us" or "our," it is a reference to all the reporting entities.

1. Steps to Prevent and Reduce the Risks of Forced Labour and Child Labour in 2023

At Yellowstone, our purpose is to help customers bring their resources to our world and our mission is to be the distribution company of choice for our customers. Our organization's core values are Safety and Quality Always, Lead, Collaborative, and Competitive. Our people are committed to providing high quality service and products safely within the framework of our core values. Our culture thrives on collaboration, diversity, and a shared passion for excellence. We are committed to operating in a safe, ethical, inclusive, transparent, and socially and environmentally responsible manner, including respecting human rights and contributing to the communities in which we live and work.

During 2023, Yellowstone conducted a review of the certain policies and procedures as they relate to risks and responsibilities associated with forced labour and child labour and child protection policies. Listed below is a summary of the actions taken to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- We have revised our Purchasing Policy to incorporate ethical procurement principles as part of our regular business practice and supplier selection. A majority of our Procurement comes from outside of Canada and all subcontracted labour is sourced from Canadian companies in alignment with the laws and regulations of Canada.





YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.

Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

- We have reviewed and communicated our Whistleblower Policy whereby employees, contractors and suppliers have an avenue to share complaints in a confidential and anonymous manner. The platform is administered by our internal human resources department and matters are investigated by internal representatives to ensure compliance with policy and legislation.
- We have reviewed our Minimum Age Policy, which is in place to ensure all employees are above the age of 18. Should the Company hire someone below the age of 18, they must meet the following criteria:
 - The employee is a participant in an industry recognized work experience program (e.g., Registered Apprentice Program in Alberta for high school students);
 - The employee is a summer student and is working in an office environment.
 - The employee is engaged in office work; or
 - The employee is engaged as a labourer or apprentice in a company shop facility or yard, and in accordance with all applicable provincial employment standards legislation.

On an annual basis, employees are required to sign or provide electronic acknowledgement of our key policies, including but not limited to, the Code of Conduct and Ethics Policy, the Whistleblower Policy, the Respect in the Workplace Policy, and the Information Technology Acceptable Use Policy.

2. Structure and Operations

Yellowstone provides distribution of pipe, flanges, and fittings to industrial markets, including oil and gas (upstream, midstream and downstream), infrastructure and water treatment. Yellowstone has warehouses strategically located across Canada and a dedicated workforce.

As of September 30, 2023, Yellowstone had approximately 140 employees. The number of employees working at the various warehouses can vary depending on seasonality and client demand. The senior executive team and head office is located in Sherwood Park, Alberta.

Yellowstone's products and services can be broadly grouped into three categories: pipe, flanges and fittings.





YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.
Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

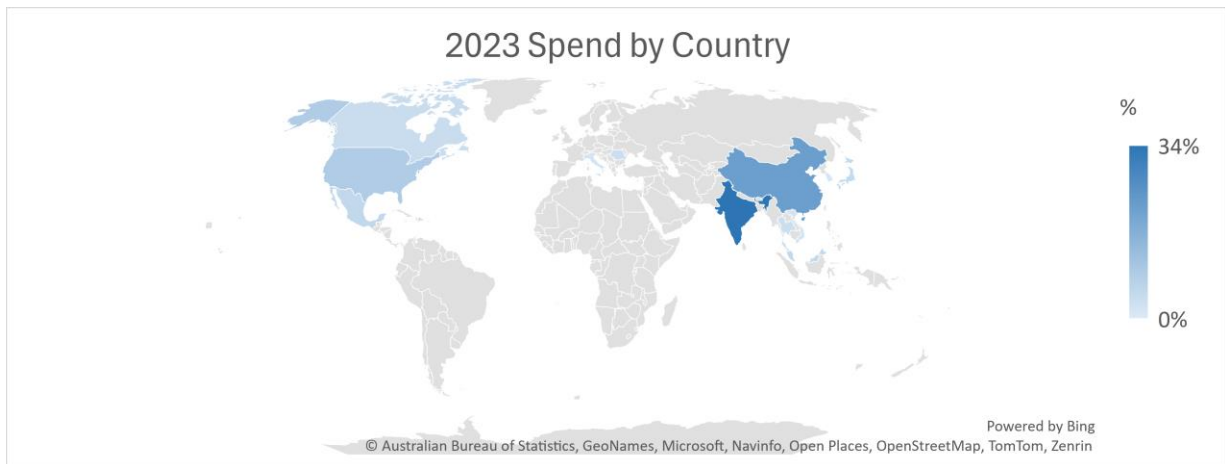
Supply Chains

Yellowstone's procurement activities are focused on various international suppliers based on quality, price and delivery. The steps taken in 2023 to prevent and reduce the risk that forced labour and child labour is used were focused on data gathering and analysis to identify any areas of the supply chain where further risk mitigation may be required. We understand that most of the supplier's supply products that originate from international locations. Our suppliers are engaged through our corporate and procurement teams. Through prequalification verifications and requirements set for approval of suppliers, we strive to build relationships with suppliers who align with our values.

Yellowstone endeavors to work with suppliers who operate legally, ethically, and responsibly, using prequalification criteria to assess that they are aligned with our safety and quality requirements, and to protect us from potential legal and reputational risks. Our prequalification assessment includes health, safety, environmental, technical compliance, financial considerations, and sustainability requirements including local and Indigenous content.

The following chart and table show where Yellowstone sourced its materials in 2023.

COUNTRY	India	China	USA	Mexico	Malaysia	Japan	Canada	All Other Countries
% SPEND	34%	22%	9%	6%	6%	5%	4%	14%





YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.
Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

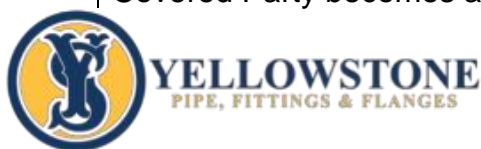
Policies and Due Diligence Practices

Yellowstone has implemented policies and practices aimed at supporting human rights and socially responsible business practices. Yellowstone requires its personnel, contractors, and suppliers to act in accordance with its policies and in so doing supports human rights and social responsibility.

Yellowstone has standard form supply chain contracts used for suppliers, which include requirements for supplier compliance with applicable laws and Yellowstone policies (including the Code of Conduct and Ethics Policy).

The following table summarizes our key policies that encourage and promote a culture of ethical business conduct.

Policy	Overview	Policy in Action
Code of Conduct and Ethics Policy	<p>The Company has adopted a Code of Conduct and Ethics Policy (the "Code") that applies to all directors, officers, employees, and service providers (each, a "Covered Party"). The principles of the Code encourage and promote a culture of ethical business conduct by establishing standards of conduct by which each Covered Party must abide.</p> <p>Each Covered Party has a responsibility to:</p> <ul style="list-style-type: none"> (i) avoid apparent or actual conflicts of interest; (ii) avoid actions or behaviours that could create an uncomfortable or hostile work environment environment; (iii) protect the Company's assets (iv) ensure confidential information remains confidential; (v) discharge their duties in compliance with applicable laws; and (vi) report violations of the Code of which such Covered Party becomes aware. 	<p>The Code of Conduct and Ethics Policy applies to all directors, officers, employees and service providers in all jurisdictions in which we operate.</p>





YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.
Dba Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

The Board, through Senior Management of the Company, is responsible for monitoring compliance with the Code. Upon accepting a position with the Company, a new director, officer, employee or service provider is required to provide an acknowledgement of their commitment to comply with the Code. In addition, each Covered Party is required to acknowledge their compliance with the Code on an annual basis.

Whistleblower Policy

The Whistleblower Policy provides a mechanism for employees, contractors and suppliers with serious concerns about any aspect of the Company's operations to come forward and voice those concerns on a confidential and, if desired, anonymous basis. This policy makes it clear that Yellowstone expects all employees to act responsibly to uphold the reputation of the organization and Maintain public confidence and employees can report such matters without fear of discrimination, harassment, or persecution.

The Whistleblower Policy applies to all employees, contractors and suppliers in all jurisdictions in which we operate.

Minimum Age Policy

The Minimum Age Policy supports our commitment to a safe workplace and enforces an age restriction in accordance with the applicable provincial Employment Standards and Human Rights legislation. A person under the age of 18 may only be employed to do work on at a Yellowstone facility or site if the employee is:

- (a) a participant of an industry recognized work experience program;
- (b) is a summer student and is working in an office environment;
- (c) is engaged in office work; or

The Minimum Age Policy applies to all personnel and contractors and suppliers of Yellowstone.





YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.
Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

	(d) is engaged as a labourer or apprentice in a company shop facility or yard, and in accordance with all applicable provincial employment standards legislation.	
Procure to Pay Policy	The purpose of this policy is to clearly define rules and expectations regarding the procurement of goods and services, confirmation of receipt of goods or verifications of services rendered, and processing of payment to the supplier. It defines the supplier selection process and purchasing process.	The Procure to Pay Policy applies to Yellowstone and all subsidiaries.





YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.

Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

5. Identifying Modern Slavery Risks, Managing Modern Slavery Risks and Remediation Measures

In 2023, Yellowstone has not identified any instances of forced labour or child labour in its operations or supply chain. As a result, it has not had to take any measures to remediate any forced labour or child labour and has identified its risk as minimal.

We are committed to providing access to effective reporting mechanisms related to concerns arising from compliance with our policies. This is substantiated through our Whistleblower Policy.

We are satisfied that, because of recruitment, remuneration and compliance measures throughout our operations, there is minimal risk that any of our employees are at risk of modern slavery. We continue to be guided by our policies and principles in our relationships with our partners, including working with reputable companies, who are required to comply with domestic and international laws.

As Yellowstone continues the development of its program to prevent and reduce the risks of child and forced labour in its supply chains and operations in 2024, we will consider and implement measures to assess the effectiveness of these processes.

6. Training

Although we do not carry out dedicated training on forced/involuntary labour, child labour and slavery, we issue our Code of Conduct annually for our employees/contractors to acknowledge that they have read and understood the Code of Conduct, and to reiterate what is expected of them in the performance of their duties.

7. Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Yellowstone. for all reporting entities.

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. 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 2023.



YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.
Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

I have the authority to bind Yellowstone. and the reporting entities. Date: May 31, 2024

Derek Christianson
COO / Director



YELLOWSTONE
PIPE, FLANGE & FITTING LTD

YELLOWSTONE PIPE, FLANGE & FITTING LTD.
Db a Allied PFF Canada or Tri-lad Flange and Fittings Canada Ltd.

90 Turbo Drive
Sherwood Park. AB T8H 2J6
Phone: 780-464-7774
Fax: 780-464-0044

1700 Bishop St. NW
Cambridge, ON N1T 1T2
Phone: 519-624-8591

1830 46th Ave
Lachine, QC H8T 2P2
Phone: 514-631-0127

10238 Nordel Court
Delta, BC V4G 1J7
Phone: 604-210-1072

Schedule "A"

Wholly owned subsidiaries of Yellowstone Pipe, Flange & Fitting Ltd.:

Tri-Lad Flange and Fittings Canada Ltd.



YELLOWSTONE
PIPE, FITTINGS & FLANGES



TRILAD
FLANGES AND FITTINGS CANADA



Allied PFF
Canada