



BILL S-211 COMPLIANCE PACKAGE FOR NPLH DRILLING

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2025 COMPLIANCE STATEMENT

Filed Pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)

Reporting Entity: Daniel and Anita Blaquiere Family Trust

Covered Entities: NPLH Drilling and Hydraulics Plus

Reporting Period: January 1, 2024 – December 31, 2024

Filing Date: May 31, 2025

Authorized Signatory: Dana Blaquiere-Norkum, President & CEO

Executive Summary

This report outlines the actions taken in 2024 by NPLH Drilling and Hydraulics Plus to prevent the use of forced labour or child labour in their operations and supply chains. It represents a follow-up to the 2024 submission (covering the 2023 period) and demonstrates compliance with planned milestones, including the creation of a CSR Committee, the rollout of policies, and the beginning of training and supplier engagement.

1. Entity Overview

Business and Registration Numbers:

NPLH Drilling

- Business Number: 230347437
- Ontario Corporation No.: 2355291 Ontario Inc.

Hydraulics Plus

- Business Number: 17470
- Ontario Corporation No.: 1169366 Ontario Inc.

NPLH Drilling and Hydraulics Plus are both Ontario-incorporated entities controlled by the Daniel and Anita Blaquiere Family Trust. NPLH Drilling provides resource-sector drilling services. Hydraulics Plus specializes in

the repair of hydraulic components. Both companies are based in Timmins, Ontario, and share administrative infrastructure, including procurement, HR, and compliance.

As of December 31, 2024:

- **NPLH Drilling** employed approximately 211 staff across Ontario and Quebec.
 - **Hydraulics Plus** employed approximately 11 staff in Ontario.
-

2. Governance and Oversight

As committed in our 2024 statement, the Corporate Social Responsibility (CSR) Committee was planned and approved in late 2024 and formally launched in Q1 2025.

- The Committee includes representatives from Legal, HR, Procurement, Operations, and Executive Management.
 - The Committee reports to the President & CEO and holds quarterly meetings with documented deliverables.
-

3. Actions Taken in 2024

Governance Implementation

- CSR Committee formed in Q1 2025 with full mandate and reporting structure.

Policy Development

- The Responsible Business Conduct (RBC) Policy was finalized in Q3 2024 and disseminated to all employees.
- The Whistleblower and Grievance Reporting Policy was completed in Q4 2024.

Training Rollout

- Mandatory employee training on ethical conduct and supply chain risk launched in Q4 2024.
- Completion rate by filing date: 81% (target of 100% by July 2025).

Supplier Engagement

- Supplier onboarding process and attestation checklist implemented in Q4 2024.
- 94% of Tier 1 suppliers completed the attestation form.

- All attested suppliers classified as low-risk as of May 2025.

4. Risk Identification

Based on our 2024 due diligence, internal audits, and supplier attestations, **no actual or potential risks** of forced labour or child labour were identified in our operations or supply chains.

In addition to internal assessments, we continue to maintain collaborative relationships with Indigenous communities such as **Taykwa Tagamou Nation, Moose Cree First Nation, Apitipi Anicinapek First Nations, Mattagami First Nation** and **Flying Post First Nation**, as well as NGOs focused on ethical labour practices and human rights. These partnerships support community-based oversight and proactive engagement in responsible sourcing and social accountability.

Our supply chain remains limited in scope, with the vast majority of Tier 1 vendors located within Ontario. Hydraulics Plus operates exclusively within Timmins and sources parts from verified Canadian suppliers. NPLH Drilling’s subcontractors are similarly subject to onboarding and attestation protocols.

We reference tools such as the Walk Free Index and U.S. Department of Labor reports, which continue to indicate low geographic and commodity-based risk exposure. We remain committed to ongoing vigilance through continued monitoring and scheduled reassessment.

5. Remediation and Grievance

No remediation was required in 2024. However, grievance systems are now in place:

- Confidential reporting email established
- Escalation protocols managed by Legal and HR

Non-compliance with supplier declarations will trigger formal review and potential disengagement.

6. Progress on 2024 Commitments

2024 Commitment	Status (as of May 2025)
Establish CSR Committee	✅ Completed Q1 2025
Finalize RBC and Whistleblower Policies	✅ Completed Q3–Q4 2024
Launch Mandatory Training	✅ Initiated Q4 2024 (81% complete)
Implement Supplier Onboarding & Attestations	✅ Completed Q4 2024

7. Future Actions (2025–2026)

- Reach 100% employee training completion by July 2025
- Extend due diligence to Tier 2 suppliers by Q4 2025

- Conduct internal audit of grievance system by Q1 2026
 - Review existing contracts for clause alignment by December 2025
 - Evaluate third-party auditor engagement by 2026
-

8. Approval and Certification

This report was approved by the Board of Directors and signed by an authorized officer.

Signed on May 28, 2025 | Dana Blaquiere-Norkum | President & CEO

A handwritten signature in blue ink, appearing to read 'D B', is written over a horizontal line.



RESPONSIBLE BUSINESS CONDUCT (RBC) POLICY

Approved by: *Dana Blaquiere-Norkum*

Effective Date: 01DEC2024

Applicability

This policy applies to all employees, officers, contractors, and suppliers of **NPLH Drilling and Hydraulic Plus**.

Definitions

Forced Labour: Any work or service which a person is compelled to perform against their will under threat of penalty, including bonded labour, debt bondage, or restrictions on movement.

Child Labour: Employment of individuals under the age of 18 in roles that are mentally, physically, socially, or morally dangerous and harmful to children or interferes with their schooling.

Tier 1 Supplier: A direct supplier with whom the company has a contractual relationship.

Tier 2 Supplier: An indirect supplier to our Tier 1 suppliers, often further upstream in the supply chain.

1. Policy Statement

NPLH Drilling and Hydraulics Plus, under the Daniel and Anita Blaquiere Family Trust, are committed to upholding the highest standards of ethical conduct, human rights, and social responsibility. We strictly prohibit the use of forced labour, child labour, or any form of modern slavery in our operations and supply chains.

This Responsible Business Conduct (RBC) Policy outlines the expectations, principles, and mandatory compliance requirements applicable to all employees, management, contractors, and suppliers.

2. Scope and Application

This policy applies to:

- All full-time, part-time, and temporary employees
 - Contractors and subcontractors
 - All Tier 1 suppliers and any third parties acting on our behalf
-

3. Core Principles

A. Human Rights and Labour Standards

- We uphold internationally recognized human rights, including freedom from forced, bonded, or indentured labour.
- We do not tolerate the employment of workers under the age of 18 in hazardous environments and strictly prohibit child labour.
- Employees and suppliers must ensure safe, non-discriminatory, and respectful workplaces.

B. Ethical Procurement and Supply Chain Responsibility

- All suppliers must complete and sign our Supplier Attestation and Onboarding Form.
- Tier 1 suppliers must verify that they do not use forced or child labour in any part of their operations.
- Tier 2 supplier due diligence will be implemented by Q4 2025.
- Suppliers found to be non-compliant are subject to review, corrective action plans, and potential disengagement.

C. Reporting and Whistleblower Protections

- A confidential grievance mechanism is in place to report unethical conduct or suspected labour violations. Concerns can be reported confidentially via email to: compliance@nplhdrilling.ca.
- No retaliation will be tolerated against individuals who report concerns in good faith.
- Reports will be reviewed by HR and Legal and escalated per established protocols.

D. Legal Compliance

We comply with Bill S-211 (*Fighting Against Forced Labour and Child Labour in Supply Chains Act*), the Employment Standards Act, and applicable human rights legislation.

4. Implementation and Training

- All employees must complete mandatory training on this policy and its principles.
- New hires will receive RBC training during orientation.
- Completion is tracked and reviewed quarterly.
- Training completion rate is targeted at 100% by July 2025.

5. Oversight and Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment or supplier disengagement.

The Corporate Social Responsibility (CSR) Committee oversees implementation and compliance.

- Quarterly reviews of policy effectiveness and supplier compliance will be conducted.
- This policy is subject to annual review and update.

6. Acknowledgement

All staff and suppliers are required to acknowledge receipt and understanding of this policy and agree to act in accordance with its principles.



SUPPLIER COMPLIANCE PACKAGE

Approved by: *Dana Blaquiére-Norkum*

Effective Date: 01JAN2025

Dear Valued Supplier,

Thank you for your continued partnership with NPLH Drilling. In alignment with **Canada's Bill S-211 – the Fighting Against Forced Labour and Child Labour in Supply Chains Act**, we are strengthening our ethical sourcing practices to ensure our operations and extended supply chains are free from forced or child labour.

Included in This Compliance Package

You will find the following three documents enclosed:

- 1. Supplier Code of Conduct**
Outlines NPLH Drilling's expectations for ethical conduct and labour standards.
 - 2. Supplier Attestation & Onboarding Form**
Confirms your agreement to comply with our Code of Conduct and obligations under Bill S-211.
 - 3. Supplier Risk Assessment Questionnaire**
Collects information about your labour practices, internal policies, and supply chain oversight.
-

Return Instructions


Please complete, sign, and return all required documents to: compliance@nplhdrilling.ca

Deadline: within **14 business days** of receipt.

We appreciate your cooperation and commitment to responsible business practices. Together, we can maintain an ethical and transparent supply chain.

Sincerely,

Steve Vachon | Procurement Manager

 705-268-7956 Ext. 220



SUPPLIER DEFINITION INFORMATION SHEET

Under Bill S-211, your Tier 1 suppliers are defined as:

Tier 1 Supplier Definition

Any **company or individual** that **directly supplies goods or services** to your organization and with whom you have a **direct contractual relationship**.

They are the **first link in your supply chain** — the vendors you pay directly.

Examples of Tier 1 Suppliers for NPLH Drilling & Hydraulics Plus may include:

For NPLH Drilling:

- Drill rig equipment suppliers (e.g., Fordia, Boart Longyear)
- Fuel & lubricant suppliers
- PPE providers (boots, helmets, gloves)
- Field subcontractors (independent drillers, helpers)
- Camp service providers (lodging, food)
- Vehicle maintenance companies
- Custom machining services

For Hydraulics Plus:

- Hydraulic parts distributors
 - Hose and fittings suppliers
 - Tool suppliers (wrenches, crimpers, etc.)
 - Freight and logistics partners
 - Safety inspection and calibration companies
-

You Do Not Need to Include:

- Internet service providers
- Utility companies (e.g., Hydro)
- One-time office supply purchases
- Local restaurants or casual service vendors

Those are considered indirect or tertiary and are not Tier 1 unless they're core to your product/service delivery.



SUPPLIER CODE OF CONDUCT

Approved by: *Dana Blaquiére-Norkum*

Effective Date: 01JAN2025

NPLH Drilling is committed to operating with integrity, transparency, and respect for human rights. We expect our suppliers and business partners to uphold the same values and comply with this Supplier Code of Conduct. This Code sets forth the minimum standards for ethical business practices, labor rights, health and safety, environmental protection, and compliance with **Canada's Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act**.

1. Compliance and Laws

Suppliers must comply with all applicable local, national, and international laws and regulations, including those related to labour, health and safety, environmental protection, anti-corruption, and human rights. This includes full compliance with **Bill S-211**.

2. Prohibition of Forced and Child Labour

Suppliers must not engage in or benefit from any form of forced, bonded, indentured, or involuntary labor. **Child labour is strictly prohibited**. All workers must be of legal working age as defined by local laws and international standards.

3. Ethical Recruitment and Employment

Suppliers shall not charge workers recruitment fees, confiscate identification documents, or restrict workers' freedom of movement. Employment must be freely chosen with transparent terms.

4. Working Conditions and Wages

Workplaces must be safe and respectful. Compensation must meet or exceed legal minimums. Hours must comply with applicable laws.

5. Health and Safety

Suppliers must provide a safe and hygienic workplace that complies with applicable health and safety laws. Appropriate training, protective equipment, and emergency protocols must be in place.

6. Environmental Responsibility

Suppliers must comply with environmental laws and adopt practices that minimize their impact on the environment. This includes responsible waste management, pollution control, and efficient use of energy and resources.

7. Anti-Corruption and Business Integrity

Suppliers must not engage in any form of bribery, corruption, extortion, or embezzlement. Business dealings must be conducted transparently and honestly.

8. Monitoring and Due Diligence

Suppliers must maintain records and allow NPLH Drilling or its authorized representatives to audit or assess compliance with this Code. Suppliers are expected to conduct their own due diligence to identify and mitigate risks within their own supply chains.

9. Reporting and Non-Retaliation

Suppliers must provide a mechanism for employees to report concerns or violations confidentially and without fear of retaliation. NPLH Drilling encourages transparency and will support suppliers in remediation where appropriate.

10. Continuous Improvement

NPLH Drilling expects suppliers to take proactive steps to continuously improve their social, environmental, and ethical performance. We may provide guidance or training as needed to support compliance and shared goals.

11. Consequences of Non-Compliance

NPLH Drilling reserves the right to take appropriate action in cases where a supplier fails to comply with this Code. Such actions may include requiring corrective measures, suspending new business, or terminating the supplier relationship. Repeated or egregious violations may be reported to appropriate authorities.

12. Cascading Expectations

Suppliers must ensure that their own suppliers, subcontractors, and business partners are aware of and comply with similar ethical and legal standards. This cascading obligation helps extend responsible business practices throughout the supply chain.

13. Policy Updates and Evaluations

NPLH Drilling may update this Supplier Code of Conduct periodically to reflect evolving laws, standards, and best practices. Suppliers are expected to remain in compliance with the most current version and to cooperate with evaluations or audits assessing such compliance.

Acknowledgment

By signing below, the supplier acknowledges receipt of and agrees to comply with the NPLH Drilling Supplier Code of Conduct.

Supplier Name: _____

Authorized Representative: _____

Signature: _____

Date: _____



SUPPLIER ATTESTATION & ONBOARDING FORM

Company Name: _____

Address: _____

Phone: _____ Email: _____

Primary Contact Name: _____

Position/Title: _____

1. Purpose

This form is issued by **NPLH Drilling** under the Daniel and Anita Blaquiere Family Trust, to ensure all Tier 1 suppliers meet ethical, legal, and operational standards as outlined under Canada's **Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)**.

By completing and signing this form, you confirm compliance with our ethical sourcing policies, including the Responsible Business Conduct (RBC) Policy, and agree to cooperate in maintaining a transparent, compliant, and socially responsible supply chain.

2. Attestation of Ethical Labour Practices

Please confirm the following by initialing each statement:

_____ Our company does not use, directly or indirectly, any form of forced labour, bonded labour, child labour, or human trafficking.

_____ Our supply chain is free from known involvement with entities engaged in modern slavery or exploitative labour practices.

_____ We are aware of and agree to comply with Bill S-211 and other applicable labour laws.

_____ We will notify NPLH Drilling **immediately** if we become aware of any potential violations of these principles within our operations or supply chain.

_____ We agree to provide access to documentation or respond to any future due diligence requests related to ethical sourcing or supply chain practices.

3. Policy Acknowledgment

_____ We have received, read, and agree to abide by the **Responsible Business Conduct (RBC) Policy**.

_____ We are aware that a **confidential reporting process** is available for raising ethical or labour-related concerns via compliance@nplhdrilling.ca.

4. Agreement to Ongoing Monitoring

_____ We agree to participate in any future compliance assessments, audits, or certification reviews as requested by NPLH Drilling.

_____ We understand that non-compliance may result in a requirement to complete corrective action plans or, in serious cases, the suspension or termination of our supplier relationship.

5. Signature & Declaration

I hereby certify that the information provided above is true and accurate to the best of my knowledge and that our company agrees to uphold these principles as a condition of our supplier relationship with NPLH Drilling.

Authorized Representative Name (Print): _____

Signature: _____

Date: _____

Company Name: _____

Position/Title: _____



SUPPLIER RISK ASSESSMENT QUESTIONNAIRE

Approved by: *Dana Blaquiére-Norkum*

Effective Date: 01JAN2025

This questionnaire is intended to assess supplier compliance with ethical sourcing standards and **Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)**. All suppliers are required to complete this form as part of NPLH Drilling's due diligence process.

1. Supplier Information

- Company Name: _____
- Primary Contact Name: _____
- Address: _____
- Email and Phone: _____
- Company Website URL: _____
- Country of Operations: _____
- Type of Goods or Services Supplied: _____

2. Labour Practices

- Do you employ workers under the age of 18? Yes No
- Do you verify age and identity of all employees? Yes No
- Are any workers employed under forced, bonded, or involuntary Labour conditions? Yes No

If Yes to any of the above, please provide an explanation:

3. Recruitment and Employment

- Do you use third-party recruitment agencies? Yes No
 - Are recruitment fees charged to workers? Yes No
 - Do you retain workers' identity documents? Yes No
 - Do workers receive written contracts? Yes No
-

4. Wages and Working Conditions

- Do you pay all workers at least the legal minimum wage? Yes No
 - Do workers receive regular breaks and days off as per local law? Yes No
 - Do you provide a mechanism for employees to report concerns confidentially? Yes No
-

5. Subcontractors and Supply Chain

- Do you use subcontractors or sub-suppliers? Yes No
 - Do you require your subcontractors to follow similar ethical standards? Yes No
 - Have you conducted due diligence or audits on your supply chain in the past 12 months? Yes No
-

6. Monitoring and Compliance

- Have you been subject to any social, labour, or human rights audits in the last 3 years? Yes No
- Do you allow third-party audits or site visits? Yes No

Please list any certifications (e.g., SA8000, ISO 26000, SMETA):

7. Policy and Documentation

- Do you have a Code of Conduct or Human Rights Policy? Yes No

- Do you have a policy prohibiting child and forced labour? Yes No
 - Please attach relevant documentation (e.g., internal policies, third-party audit reports, certifications such as SA8000, SMETA, WRAP).
-

8. Declaration

I confirm that the information provided above is true and accurate to the best of my knowledge, and that my organization complies with applicable labour laws and ethical standards.

- Name: _____
 - Title: _____
 - Signature: _____
 - Date: _____
-



Return Instructions

Please complete and return this signed form to **compliance@nplhdrilling.ca** within **14 business days** of receipt.



Incomplete or late submissions may result in a temporary suspension of supplier approval status.



Providing false or misleading information may result in disqualification from current or future business with NPLH Drilling. The Company reserves the right to verify responses and request supporting documentation.

WHISTLEBLOWING & ETHICAL SUPPLY CHAIN REPORTING POLICY

Approved by: *Dana Blaquiére-Norkum*

Effective Date: 01DEC2024

This Whistleblowing Policy (“Policy”) is implemented by NPLH Drilling (“Company”) and outlines the Company’s expectations and procedures for confidentially reporting actual or suspected incidents of misconduct in the workplace and within the supply chain.

1. Policy Statement

NPLH Drilling is committed to upholding a culture of **transparency, integrity, and accountability**. Every employee has the right—and the responsibility—to speak up about unsafe or unethical conduct. This Policy ensures that concerns are heard, addressed appropriately, and that employees who report in good faith are protected from retaliation.

2. Definitions

For the purposes of this Policy:

Whistleblower: An employee, contractor, or stakeholder who reports suspected misconduct or violations under this Policy.

Retaliation: Any adverse action taken against a whistleblower for reporting in good faith, including termination, demotion, harassment, or threats.

Modern Slavery: Practices including forced labour, human trafficking, debt bondage, and exploitation.

Child Labour: The use of children in employment that is illegal, exploitative, or interferes with their education or development.

3. Scope

This Policy applies to all NPLH Drilling employees, contractors, and agents. It covers incidents occurring:

- Within the workplace;
 - During work-related travel or events;
 - During interactions with clients, vendors, and other stakeholders.
-

4. What Can Be Reported?

Employees are encouraged to report any concerns related to:

- Unsafe practices or equipment misuse (e.g., bypassing hydraulic safety systems)
- Workplace misconduct (e.g., harassment, bullying, discrimination, violence)
- Fraud or unethical behavior (e.g., falsifying records, accepting kickbacks)
- Violations of laws or company policies

Bill S-211 Specific Language:

Employees are also encouraged to report any concerns related to modern slavery, human trafficking, child labour, or unethical labour practices involving NPLH Drillings' operations, suppliers, or subcontractors, in accordance with Canada's Bill S-211.

5. Reporting Mechanisms

Employees may report concerns through one or more of the following methods:

- **Direct Reporting:** Speak to your supervisor, manager, or Human Resources.
 - **Confidential Hotline:** 1-877-292-0209 (available 24/7, anonymous option available).
 - **Secure Drop Box:** Located in the workplace for confidential written submissions.
 - **Confidential email:** Employees may also submit concerns via email to: compliance@nplhdrilling.ca
-

6. Investigation & Follow-Up

All concerns will be treated seriously and addressed as follows:

- **Initial Review:** Reports will be reviewed within **five (5) business days** to determine whether a formal investigation is warranted.
 - **Formal Investigation:** Where appropriate, a confidential and impartial investigation will be conducted.
 - **Corrective Action:** Depending on the findings, actions may include retraining, disciplinary measures, or procedural changes.
 - **Feedback:** Where legally appropriate, the Company will provide the whistleblower with a summary of the investigation's outcome.
-

7. Protection of Whistleblowers

- **Non-Retaliation:** No employee will face retaliation, intimidation, demotion, harassment, or adverse treatment for reporting a concern in good faith.
 - **Confidentiality:** All efforts will be made to protect the identity of whistleblowers and maintain strict confidentiality.
 - **Support Services:** Employees will be offered assistance throughout the reporting and investigative process as needed. Support may include access to internal HR guidance or external Employee Assistance Programs (EAP), where available
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8. False Reporting

Employees must report concerns honestly and in good faith. Knowingly submitting false or malicious allegations may result in disciplinary action, up to and including termination of employment.

9. Responsibilities

- **All Employees:** Expected to report unsafe, illegal, or unethical conduct and cooperate with investigations.
 - **Supervisors & Managers:** Must uphold this Policy, support employees who raise concerns, and respond professionally and promptly.
 - **Human Resources:** Responsible for policy administration, investigation oversight, and training.
-

10. Legal Compliance

This Policy is aligned with applicable legislation, including the **Occupational Health and Safety Act (Ontario)**, **Employment Standards Act, 2000**, and the **Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill s-211)**.

11. Policy Amendments

NPLH Drilling reserves the right to revise this Policy at any time to reflect changes in law, business operations, or best practices. All changes will be communicated to employees.

12. Acknowledgment

By signing below, the Employee acknowledges that they have read, understood, and agree to comply with the terms outlined in this **Whistleblowing & Ethical Supply Chain Reporting Policy**.

Employee Name (Print): _____

Employee Signature: _____

Date: _____

SUPPLIER TRACKING FORM - SAMPLE

TIER 1 - SUPPLIER TRACKING

Supplier Name	Email Address	Phone Number	Goods/Services Supplied	Contract/PO Reference	RBC Policy Sent (Y/N)	Attestation Form Sent (Y/N)	Attestation Form Rec'd (Y/N)	Risk Rating Low/Medium/High	Follow-up Required (Y/N)
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TRAINING COMPLETION TRACKING FORM - SAMPLE

TRAINING COMPLETION TRACKING

Employee Name	Position / Title	Date Assigned	Training Type RBC/Whistleblower/ Procurement	Completion Date	Comments/ Notes
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