



FIGHTING AGAINST FORCED
LABOUR AND CHILD LABOUR
IN SUPPLY CHAINS

2024 REPORT

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Introduction

This report (the “**Report**”) was developed in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C 2023, C 9 (the “**Act**”) to disclose CEDA’s efforts related to preventing forced labour, child labour and modern slavery (“**Forced Labour**”) in its supply chain, workforce and operations during the business year that ended on December 31, 2024 (the “**Reporting Period**”).

This Report has been completed by CEDA Limited Partnership to address the reporting requirements for five of its affiliated operating legal entities: CEDA Services and Projects LP, CEDA Industrial Services LP, CEDA Specialty Services LP, CEDA Field Services LP and CEDA West Services Limited. CEDA Limited Partnership and its wholly controlled subsidiaries listed above are collectively referred to as “**CEDA**”, “**we**” or “**our**”.

Structure, Activities and Supply Chains

CEDA is a portfolio company of the Hillcore Group, a leading independent Canadian investment firm. Headquartered in Calgary, Alberta, CEDA employs up to 2,200 people during peak operating periods. CEDA’s business operations are North American based, with staged operations throughout Canada and one location in Pasadena, Texas. A list of our locations can be found at <http://www.ceda.com/locations>.

We provide industrial maintenance, turnaround and environmental services—either as standalone offerings or as part of an integrated solution. Through our client partnerships over the past five decades, we have developed a broad range of technical expertise serving a wide variety of industries—oil and gas, pipeline, power, pulp and paper, chemical, mining, municipal and steel.

In support of our operations and customers, CEDA purchases a variety of goods and services including but not limited to: materials, rentals, equipment, hospitality, transportation and labour.

As part of CEDA’s core philosophy on community investment, we are committed to supporting wherever possible, local businesses, community organizations and Indigenous groups, as well as training, employing and procuring locally from communities where we operate, as guided by our Procurement Policy. The majority of CEDA’s suppliers are Canadian; however, we do import goods from the United States and abroad as necessary to meet operational specifications.



Policies and Due Diligence Processes

It is important to CEDA to be a good corporate citizen wherever we conduct business. Our commitment to our owners, employees, customers, suppliers and communities is to ensure our business activities meet or exceed industry standards and are compliant with all local laws and legislative requirements.

This commitment to corporate social responsibility is supported by CEDA' Corporate Core Values, the CEDA Code of Conduct and Ethics Policy and our Diversity Equity and Inclusion Policy.

CEDA's Whistleblower Policy facilitates *anonymous* disclosure of any alleged Forced Labour. The policy mandates that CEDA employees, contractors and suppliers are expected to report any potential violations of applicable law or other misconduct. CEDA is committed to investigating any such allegations and violations can lead to disciplinary action, up to and including termination.

CEDA continually monitors and self-assesses our policies and governance performance in relation to our industries and legislative requirements. This review includes determining whether it is appropriate to make changes to address the potential for Forced Labour in our supply chain and operations. In 2024, the results of this review determined that no specific changes were required.

Areas of Risk

As we engage with customers, partners and suppliers across various locations, we recognize that the risk of Forced Labour may differ within our operations and cannot be overlooked. Some of our services, particularly those in the construction, fabrication and industrial services sectors, may carry a risk of Forced Labour, depending on the origin of some goods integrated into the services CEDA provides installing, constructing or fabricating a final finished product. Therefore, we have identified the following risk areas to help us assess and address Forced Labour:

Suppliers of Products and Services

Supply chains are complex with the potential for our primary suppliers to use secondary or tertiary suppliers or sub-contractors who engage in Forced Labour manufacturing processes as part of their supply chain. All of our commercial commitments to suppliers include mutual expectations to follow local and applicable laws and legislation and to adhere to CEDA's Code of Conduct and Ethics Policy.

Recruitment and Employment

Both direct hire and contracted personnel through agencies, including temporary staff and contractors, may face the risk of human trafficking, bonded labour, low-wage and other forms of Forced Labour and precarious work. Canada is a signatory member to the International Labour Organization's declaration on fundamental principles and core-working rights, inclusive of the principle that there should be an elimination of all forms of Forced or Compulsory Labour. As such, we follow applicable employment



standards legislation and use equitable recruitment and screening practices, employment policies and procedures to ensure everyone is treated ethically and to mitigate the potential risks of underage employment, Forced Labour or precarious work.

Remediation Measures

CEDA acknowledges the requirement to report on what remediation measures it has taken, if any, to remediate any instances of Forced Labour in its business operations or supply chain and counteract the potential loss of income for vulnerable families impacted by it.

Measures Taken to Remediate Any Forced Labour or Child Labour and to Remediate the Loss of Income

CEDA has not identified any instances of Forced Labour in the Reporting Period and therefore no remediation measures with respect to Forced Labour or Loss of Income were taken.

Training

All CEDA employees receive training on our policies during the onboarding process and complete annual attestations on CEDA policies.

CEDA has a stakeholder committee working together to ensure we meet the regulatory requirements of the Act and its efforts aligns with customer expectations and industry best practices. In 2024, no formal training was mandated to employees on Forced Labour. The organization is exploring training options specific to Forced Labour and the regulatory requirements of the Act.

Effectiveness

CEDA is committed to meeting all regulatory requirements and meeting the expectations of our customers in our operations. In 2024, there were no reported instances of Forced Labour in any of CEDA's business activities. CEDA will continue to review our policies, processes and practices on an on-going basis to see if enhancements are needed to mitigate risk of occurrences of Forced Labour.



Attestation

CEDA's Board of Directors approved this report on May 14, 2025, for the financial year ended December 31, 2024, in accordance with the Act.

"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."

A handwritten signature in black ink, appearing to read "K. Fleury", with a horizontal line extending to the right.

Kevin Fleury
President & Chief Executive Officer of CEDA

Date: May 29, 2025

I have the authority to bind CEDA and I am attesting this Report on its behalf and not in my personal capacity.