



Kingston Midstream

---

---

2024 Report on Forced Labour in Canadian  
Supply Chains

May 31, 2025

## Identifying Information

Kingston Midstream Limited, Kingston Marketing Limited, Kingston Midstream Saskatchewan Limited, and Kingston Midstream Westspur Limited (together, Kingston) are Entities as defined by Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (The Act). This report provides Kingston's statement for the financial year ending 31 December 2024 and meets the reporting requirements of The Act.

### Reporting

Reporting entity's legal name	Kingston Midstream Limited Kingston Marketing Limited Kingston Midstream Saskatchewan Limited Kingston Midstream Westspur Limited
Financial reporting year	2024
Identification of a revised report	None
Business number(s), if applicable	Kingston Midstream Limited 71004 7093 RC0001 Kingston Marketing Limited 84735 1707 RC0001 Kingston Midstream Saskatchewan Limited 10431 2079 RC0002 Kingston Midstream Westspur Limited 10565 3893 RC0001
Identification of a joint report	Yes
Identification of reporting obligations in other jurisdictions	None
Sector/industry	Other: Oil and Gas Midstream (pipeline and storage)
Location (if in Canada, which province headquartered or principally located)	Alberta, Canada (headquarters) Alberta, Saskatchewan, and Manitoba (operations)

### Entity Categorization

a. is listed on a stock exchange in Canada; or	No
a. has a place of business in Canada, does business in Canada or has assets in Canada and that, based on its consolidated financial statements, and meets at least two of the following conditions for at least one of its two most recent financial years:	Yes
i. it has at least \$20 million in assets,	Yes
ii. it has generated at least \$40 million in revenue, and	Yes
iii. it employs an average of at least 250 employees.	No

---

## Annual Report

In 2024, Kingston continued to take measures to prevent and minimize the risk of forced labour and child labour in the production of goods, both in Canada and globally. These efforts involved continued supply chain mapping and the implementation of a high-level assessment of the risk of potential instances of forced labour and child labour throughout our operations and supply chain.

### **Structure, Activities and Supply Chains**

Kingston Midstream Limited (Kingston), a Canadian private corporation, offers services to several subsidiary operating companies, including Kingston Marketing Limited, Kingston Marketing USA Limited, Kingston Midstream Saskatchewan Limited, Kingston Midstream Westspur Limited, Kingston Midstream Weyburn Limited, Kingston Midstream Virden Limited, and Kingston Midstream Alberta Limited. As of December 31, 2024, Kingston has 202 employees, while Kingston Marketing Limited has 30 employees, all based in Canada. The other entities listed in this paragraph do not have any employees. This report is a joint report for Kingston Midstream Limited, Kingston Marketing Limited, Kingston Midstream Saskatchewan Limited and Kingston Midstream Westspur Limited.

The predominate business of the operating companies is the gathering, terminalling, and marketing of crude oil (goods) produced in the provinces of Manitoba, Saskatchewan, and Alberta to locations within Canada.

Located solely within Canada, Kingston's operations entail minimal transactions related to importing goods from outside the country. Most of Kingston's supply chain, including pipe material, chemicals, and manufactured items, is sourced from Canadian vendors. Additionally, services are procured by Kingston through Canadian entities. Kingston also engages in crude oil marketing activities in the United States.

Kingston's organizational structure consists of an Executive Leadership Team reporting to Kingston's Chief Executive Officer, who reports to the Kingston Board of Directors.

### **Policies and its due diligence processes in relation to forced labour and child labour**

Kingston does not have policies in place relating to forced labour and child labour.

### **Business and supply chains risks**

Kingston's internal risk assessment indicates a very low level of risk of forced labour or child labour being used in our business or supply chain. Kingston continues to investigate the supply chain and raw materials used by our Canadian suppliers and our tier two or three suppliers. Additionally, there are risks associated with the use of outsourced, contracted, or subcontracted labour and the location for our services companies.

In 2023, Kingston initiated supply chain mapping, and a preliminary review did not indicate a high level of risk. This project continued in 2024, and the assessment thus far has not identified any critical concerns requiring immediate action.

Suppliers are monitored through Kingston's Supply Chain department for their Worker's Compensation Board compliance and insurance and Health and Safety compliance. Grievances by contractor or vendor employees can be communicated to Kingston through email or phone contact, which are provided on its external website. Kingston employees can also provide anonymous grievances to the Kingston CEO email address.

---

### **Measures taken to remediate any forced labour or child labour**

No instances of forced labour or child labour were identified and therefore no interventions or remedial measures were deemed necessary.

### **Measures taken to remediate the loss of income to the most vulnerable families**

No instances of forced labour or child labour were identified, and so no measures were taken to eliminate the use of forced labour or child labour and therefore there was no need to remediate the loss of income to vulnerable families.

### **Training provided to employees on forced labour and child labour**

Training is not provided to employees on forced labour and child labour.

### **How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

Kingston has an adequate process for preventing forced labour and child labour within its business and supply chains. Kingston will regularly review the effectiveness of this process including supplier assessments, contracting practices, and third-party evaluations to scrutinize compliance with ethical labour practices. Ongoing collaboration with stakeholders, engagement with industry best practices, and the continuous development and enhancement of due diligence processes contribute to a comprehensive evaluation framework. This proactive approach ensures a thorough assessment of the entity's efforts in maintaining a responsible and ethical business environment.

## **Conclusion**


In summary, this report fulfills Kingston Midstream Limited's obligations under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act for the fiscal year ending December 31, 2024. Kingston has determined that its supply chain, and operational practices carry a low overall risk level and initiated measures to identify the risks of forced labour and child labour in its operations and supply chain. While the internal risk assessment indicates a further attention will be directed towards our vendor supply chains and outsourced labour for services companies. Despite the absence of identified instances of forced labour or child labour in 2024, Kingston recognizes the importance of ongoing diligence and is in the process of developing a program to address the potential for forced labour and child labour. Kingston will continue to develop its measures to prevent and minimize the risk of forced labour and child labour in its operations.

---

## Attestation and Board Approval

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Secretary, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that this report has been approved by the Board of Directors of the entities and the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

I have the authority to bind the entities listed above.

  
\_\_\_\_\_  
Heather Piercy

Title VP Law and General Counsel

Date May 22, 2025