



NORTH WEST REDWATER PARTNERSHIP

ANNUAL REPORT

FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Reporting Year: 2024
Submission Deadline: May 31, 2025

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 below. 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.


Name	Peter Duda
Title / Company	General Manager, North West Redwater Partnership
Date	May 8, 2025
Signature	
	I have authority to bind North West Redwater Partnership.

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1.0 INTRODUCTION

- The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* came into effect in Canada in 2024 to encourage businesses in Canada to help eradicate modern slavery.
- With millions of victims worldwide as reported by the International Labour Organization, forced labour and exploitative child labour exists in many supply chains around the globe.
- According to Public Safety Canada, the Act aims to increase industry awareness and transparency as well as drive businesses to improve practices.

2.0 PURPOSE AND SCOPE

- North West Redwater Partnership (NWRP) has an obligation to complete an annual report as a business entity in Canada meeting the size threshold that produces, sells and imports goods.
- Information contained within this report covers NWRP's 2024 financial year and relates solely to the subject of forced labour or child labour. The report contents are structured as per the requirements of the Act and are not intended to be future looking.

3.0 STRUCTURE AND ACTIVITIES

- **Mission:** Maximize the value of processing bitumen into energy products safely and responsibly by our high performing teams for our partners, customers, and Alberta.
- North West Redwater Partnership ("NWRP") is a 50/50 general partnership between CNR (Redwater) Limited ("CNR Redwater") and APMC (Redwater) L.P. ("APMC LP"). NWRP owns and operates a single asset – the Sturgeon Refinery – located 45 km north east of Edmonton, Alberta. The refinery became commercially operational in June 2020. The refinery employs more than 350 employees and more than 150 contractors for a total workforce of over 500 individuals. All are based in Alberta, Canada.
- The partnership's strategic direction is set by the Executive Leadership Committee (ELC), which has two representatives from CNR Redwater and two from APMC LP. With guidance from the ELC, the Senior Leadership Team (SLT) is responsible for daily operations of the facility, ensuring appropriate and effective measures are in place to create and execute strategies and manage operational requirements.
- The Sturgeon Refinery is designed to process approximately 79,000 barrels per day of diluted bitumen from Alberta's oil sands. Bitumen feedstock is processed into diesel, vacuum gas oil, diluent, and natural gas liquids (see table below). The refinery uses leading-edge technology while meeting environmental performance benchmarks with carbon capture and storage to lower the overall environmental footprint. Products are transported to customers via pipeline, truck and rail mainly throughout Canada and into the United States.

Product	2024 Average Barrels Per Day
Bitumen Feedstock Processed	45,800+
Diesel Produced	37,800+
Other Energy Products Produced	38,700+

4.0 SUPPLY CHAINS

- In 2024, NWRP spent \$1.5+ billion CAD on the acquisition of goods, services, feedstock and commodities that were necessary to operate its Sturgeon Refinery. The supplier base consisted of over 900 vendors. Feedstock and commodities represent the vast majority of the overall spend followed by services, and goods, respectively.
- NWRP’s 2024 procurement breakdown by region (rounded to the nearest hundredth):
 - Canada: 91.79%
 - United States: 8.17%
 - Outside of North America: 0.04%

5.0 POLICIES AND DUE DILIGENCE PROCESSES

- NWRP has various policies to guide business conduct. NWRP also complies with the Government of Alberta's Alberta Employment Standards which govern the rules, regulations, and compliance measures for employers and employees in Alberta workplaces.
- Our direct suppliers, including all entities that provide goods or services to NWRP, must comply with our policies and applicable laws, including laws related to labour standards and to extend these principles to their own employees and supply chains for the goods and services provided to NWRP.
- Due diligence activities are undertaken to ensure NWRP and our vendors are upholding high standards of integrity, ethical conduct and responsible business practices in our activities and supply chains, including but not limited to the policies listed in the table below.

Policy	Purpose	Impact on Forced Labour	Due Diligence
Code of Conduct Policy	Reflects values and clearly articulates standards	Confirms commitment to ethical business practices and behaviours in all business affairs	Annual code of conduct training and signed recommitment of all NWRP personnel
Work Schedules Policy	Outlines work schedules for employees, with reference to Vacation and Overtime policies	Confirms alignment with the rules and regulations of the Alberta Labour Board	Annual review of policy in addition to review/approval processes to confirm that schedules and hours worked comply with all applicable laws including Alberta Employment Standards
Recruiting and Hiring Policy	Explains the process for recruiting and selecting candidates to fill employment vacancies	Affirms commitment to equal opportunity and transparency of recruitment process	Annual review of policy and recruitment process in addition to new hire sign off that confirms new hires have read and agree to NWRP's terms of employment
Respectful Workplace Policy	Articulates the corporate culture at NWRP which requires personnel to comply at all times with NWRP's Respectful Workplace Policy	Mitigates risk of harassment, discrimination, violence, or hardship and outlines the process for reporting complaints or concerns	Annual review of policy in addition to respectful workplace training and signed recommitment of all NWRP personnel
Allegations of Wrong Doing Policy	Maintains a system to receive, retain and promptly address concerns of questionable practices or potential violations of any of NWRP's policies	Provides a means of confidential reporting of all violations, including suspected violations	Prompt investigation of all submissions to NWR's Confidence Line in addition to quarterly sign off by Senior Management confirming ethical business practices and corporate policies, including a disclosure of any known forced labour or child labour in NWRP's business activities
Refinery Operations Procurement Policy	Outlines the process and requirements for procuring goods and services	Affirms requirement that all supply chain activities must be conducted in compliance with NWR policies and government legislation	Screening during vendor selection process verifies that each vendor complies with all NWR policies and government legislation

6.0 FORCED LABOUR RISK AND MITIGATION

- NWRP procures feedstock, materials and equipment from third party vendors of which nearly 100% is from within North America. Of the North American spend, Canadian suppliers account for nearly 92%, and are subject to Canadian employment and human rights laws, as well as the forced labour and child labour import restrictions under Canada's *Customs Tariff* and reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This is complemented by forced labour restrictions in the United States such as the most recent *Uyghur Forced Labour Prevention Act of 2021*.
- As such, the likelihood of forced labour and child labour being a risk in connection with NWRP's operations is low in light of the geographic source of NWRP's procurement (being North America) along with the company's commitment to compliance with Alberta labour and employment laws and human rights standards and the policies and procedures in place to address these requirements.
- NWRP reviews operating activities and relationships with suppliers in the normal course of business to monitor for any changes in circumstances that could increase risk. The policies and due diligence activities described in section 5.0 above provide the necessary risk identification and mitigation.

7.0 REMEDIATION MEASURES

- During the 2024 reporting period, NWRP did not identify any specific instances of forced or child labour in its activities or supply chains, and accordingly NWRP did not implement any specific remediation measures in relation to such issues. Similarly, no specific measures have been taken by NWRP to remediate lost income by vulnerable families as a result of forced or child labour.

8.0 EMPLOYEE TRAINING

- During the 2024 reporting period, NWRP's training included overall business conduct, ethics, reporting, and standards. NWRP's employment policies are posted internally for all staff to access. Training on the Code of Conduct and Respectful Workplace policies occurs upon hire and mandatory in-person and written recommitment by all staff occurs on an annual basis.

9.0 ASSESSMENT AND EVALUATION

- For the 2024 reporting period, NWRP deems the risk of forced labour and child labour in its domestic operations as low. NWRP remains committed to monitor for any changes in circumstances that could increase risk.