



Forced Labour and Child Labour in Supply Chain Assessment - 2025

Introduction

This report has been prepared in compliance with the requirements of the Fighting Against Forced Labor and Child Labor in Supply Chains Act (Bill S-211) that came into effect on January 1st, 2024. Side Group began to prioritize the assessment of forced labour and child labour within its supply chain, and this is the second report submitted to the Minister of Public Safety Canada. The office address of Side Management Ltd is #206 10625 West Side Drive, Grande Prairie, AB T8V 8E6 and subsidiaries are as shown below.

This report represents actions taken during the financial years as noted:

- Northern Metallic May 2023 to April 2024
- Baron Oilfield Supply May 2023 to April 2024
- Paragon Oilfield Supply January 2024 to December 2024

Business Structure & Activities

The Side Group has a long history in Northern Alberta and Northern British Columbia. The Side Group began in 1954 as a family owned enterprise and continues to be operated in that fashion, today.

Our affiliates engage in a variety of industrial supply, sales, operational, logistical, development, and service-focused functions. This report will feature those companies that engage in the supply and distribution of goods only; primarily Northern Metallic, Paragon Oilfield Supply and Baron Oilfield Supply. Those companies primarily specialize in supplying the industries of oil and gas extraction, mining, forestry, transportation, agriculture, and construction.

Not all Side Group locations must report on Bill S211 per the reporting criteria, however, as a company, we are committed to acting as a responsible Canadian corporate entity and we recognize that the responsibility for ensuring an ethical supply chain should apply to all, regardless of size. With that foremost in our mind, we have chosen to report on all our sales and distribution focused companies, regardless of whether they meet the current "reporting entity" conditions.

Within Side Group, we have a combined total of 1250+ distinct suppliers utilized during the past year. This includes repeat and one-time inventory suppliers and indirect suppliers of goods to support operations.

Steps Taken To Prevent and Reduce Risk

Side Group has taken the following steps during 2024 to identify and manage forced labour and child labour risk within our supply chain:

- Held internal discussions with leadership team members to apprise them of our compliance obligations and existing measures being taken.
- Mapped our supply chain and categorized all 1250+ suppliers according to their level of risk.
- Engaged with all 1250+ suppliers through an online survey which required them to self report risk in their own supply chain.
- Made our Supplier Code of Conduct public information and published on our corporate site.
- Shared our 2024 report with several customers at their request.
- Supplier reports were obtained for 53% of our suppliers (based on spend), and we are continuing to reach out to those who have not responded.
- Created an online training program for employees with purchasing responsibility.
- All staff completed the mandatory training to ensure they are all aware of the importance of acting with integrity and doing their due diligence throughout the purchasing process.
- Process mapping of our supplier onboarding process has begun and will be completed over the next 12 months. This will result in a singular, rigorous supplier approval process and require all new suppliers to provide compliance data relating to their Bill S211 status and the origin of their goods for resale.

High Risk Areas | Identification & Management

Our method of risk assessment for our 1250+ suppliers involved evaluation of the qualifiers below:

1. The country of origin of the imported goods, focus placed on countries with higher risk as noted by the U.S. Department of Labor, Bureau of International Labor Affairs ([ILAB](#))
2. The type of product purchased – prioritization of the types of goods noted in the [Walk Free 2023 Global Slavery Index](#)

Inventory vs Indirect Goods

Most annual procurement is for the purpose of distribution to end users and far exceeds the goods and services that we consume during daily operations. We have elected to focus exclusively on supply chain mapping and risk identification of our end-user goods before addressing indirect goods. We do acknowledge the limitations of our current evaluation strategy.

High-Risk Goods

Using the Walk Free 2023 Global Slavery Index, we were able to identify several high-risk goods which we currently stock within our inventory and will need to investigate further. We do acknowledge that the current evaluation only represents a brief analysis of our goods procured and has limitations.

Remediation of Forced and Child Labor

Side Group is in the process of creating and standardizing our internal processes and documents to ensure that further harm is unlikely to occur within our supply chain. This process of understanding and evaluating our supply chain has not identified any instances of child/forced labour.

Other than our internal actions to identify risks and monitor our suppliers, we have not taken any direct measures to remediate any forced/child labour or any loss of income resulting from measures taken to

eliminate forced/child labour in 2024.

Self-assessment

Side Group has so far focused its efforts on collecting data from our suppliers and determining which areas are most at risk. We recognize that refining our internal processes will be an ongoing process. We expect to develop meaningful metrics to assess the effectiveness of our program in preventing and/or reducing forced/child labor as our understanding of the program matures.

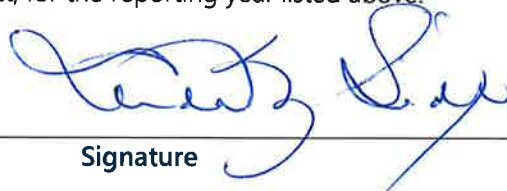
Conclusion

Progress has been made in specific areas including internal documentation and training. Policies are in place and are being circulated among key stakeholders. Onboarding of suppliers is a continually evolving process and we will work to develop an internal risk matrix to standardize the onboarding and supplier approval process. Our focus will continue to be the communication with existing suppliers of inventory goods before moving on to indirect spend.

Approval and 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 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.

Linda Side



Full Name

Signature

Managing Director

July 11, 2025

Title

Date

I have the authority to bind SIDE GROUP, and this report covers financial year 2024 and applies to SIDE GROUP