



This report applies to Swift Oilfield Supply Incorporated (Swift Supply) and is made pursuant to Bill S-211 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, also referred to as the Canada Modern Slavery Act. Swift Supply is Canadian owned and operated distributor of pipe, valves, and fittings. With our headquarters and distribution center in Nisku, Alberta Swift's footprint includes 16 locations across Western Canada.

This report sets out Swift Supply's organizational values, policies, and actions with respect to modern slavery, in alignment with the six mandatory disclosure areas outlined in Section 11 of the act.

Swift Supply is committed to fostering a culture of safety, sustainability, and corporate responsibility. This includes honouring fundamental human rights and strictly prohibiting the use of forced labour and child labour in any form throughout all operations and supply chains. The company has taken the necessary steps to comply with the requirements of the Act and continues to refine its practices as part of ongoing due diligence.

Structure, Activities, and Supply Chains

Swift Supply sources products globally based on customer requirements and industry needs. Pipe, valves, and fittings comprise the bulk of Swift's product mix. The company maintains a broad and diversified supplier base to meet the demands of the Canadian oil and gas sector.

Policies and Due Diligence Processes

Swift Supply's Supplier Code of Conduct outlines strict expectations regarding ethical sourcing and labour practices. All suppliers are required to comply with laws prohibiting forced and child labour and to operate workplaces free from coercion, abuse, or discrimination. No issues or areas of non-compliance were identified in 2024

Compliance is reviewed through Swift's vendor onboarding and re-evaluation processes. Documentation and adherence to the Code are monitored on an ongoing basis.

Identifying and Assessing Risks

Swift Supply has assessed its supply chain based on known risk factors such as geographic location, product type, and labour practices. Based on publicly available indices and industry benchmarks, certain global regions are recognized as carrying elevated risk for modern slavery. As of the end of 2024, Swift has no evidence of forced labour or child labour within its operations or supply chain.



Actions Taken to Address Risks

In 2024, Swift Supply:

- Collected signed acknowledgements from suppliers regarding the Supplier Code of Conduct
- Conducted on-site evaluations with several key global suppliers and observed no evidence of non-compliance
- Conducted routine reviews as part of its supplier management process
- Reinforced expectations through direct communication with suppliers and other stakeholders

Swift remains committed to working collaboratively with its suppliers to uphold these principles and will take appropriate action, including the potential discontinuation of business relationships, if compliance cannot be ensured.

Measuring Effectiveness

Effectiveness is evaluated based on compliance rates, supplier engagement, and absence of known violations. Enhancements to internal tracking may be considered in future years.

Training and Awareness

Training and informational resources are provided to employees to ensure understanding of Swift's stance against forced and child labour. Awareness is incorporated into onboarding for new employees. Swift continues to educate suppliers as part of its long-term ethical sourcing objectives.

Reporting and Whistleblower Mechanism

Swift encourages reporting by employees and third parties to report any suspected violations of human rights, including modern slavery. Confidential reporting mechanisms are available, and no retaliation is permitted for good faith reporting. Each report is investigated with findings escalated to senior leadership as appropriate.



This report has been reviewed and approved by the governing body of Swift Supply and will be updated as necessary to remain aligned with the Canada Modern Slavery Act and Swift's internal practices.

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 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. I confirm that I have the authority to bind Swift Oilfield Supply Incorporated.

Brett Peat

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Vice President – Supply Chain

May 31, 2025