

SUPPLY CHAINS

Our supply chain activities are predominantly located in North America, with over 99% of Supply Chain spending sourced from suppliers within North America. Supply Chain inputs include proppants, chemicals, equipment and parts sourced from entities operating within the United States of America or Canada.

POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Policies

Pursuant to the enactment of the Modern Slavery Act, Trican implemented a policy on Forced Labour and Child Labour (the “**Policy**”) in 2023. For the 2024 reporting year, Trican continued to embed the policy within its operations and business. As reported in 2023, amongst other things, the Policy states that Trican is opposed to all forms of forced and child labour in its supply chain activities and will use its best endeavours through its due diligence process and supplier reporting requirements to ensure that forced and child labour are avoided in the supply of goods and services that Trican procures from its suppliers or that it provides to its customers.

The objective of the Policy is:

“to ensure that Trican has adequate procedures in place to manage the risk of the use of forced labour and child labour in its supply chain and can demonstrate compliance with the Modern Slavery Act.”

The key principles of the Policy are:

- Due Diligence,
- Training,
- Compliance Statements in Contracts and Agreements and
- Enforcing Compliance.

No changes or amendments were made to the policy in 2024.

In addition to the Policy, the following policies guide Trican’s commitment to ensuring ethical and responsible business conduct:

Policy	Overview	Scope
Code of Ethics & Professional Conduct (the “ Code ”)	The Code requires persons acting on behalf of Trican to act with honesty, integrity, and fairness in every dealing for and on behalf of Trican and to conduct Trican’s business in compliance with laws, rules, regulations, and other legal	The Code extends to all directors, officers, employees, contractors, agents, and other Trican representatives when engaged in Trican business.

	requirements applicable to our business operations.	
<u>Anti-Corruption Policy</u>	Trican's Anti-Corruption Policy states Trican's commitment to upholding and complying with anti-bribery and anti-money laundering laws in the jurisdictions in which we operate.	The Anti-Corruption Policy applies to the board of directors, employees, agents, contractors, and all persons acting for and on Trican's behalf.
Violence, Harassment & Discrimination Policy	This policy outlines the behavioural expectations of all employees and communicates Trican's commitment to prevent threats of violence and harassment, including sexual harassment and discrimination against employees. All reports of alleged violence, harassment, and/or discrimination are promptly investigated by a Trican official or an external investigator and corrective actions are taken.	The policy applies to all Trican employees in all areas where we conduct business.
Whistleblower Policy	The Whistleblower Policy is a statement of Trican's commitment to ensuring that any wrongdoing by Trican or any of its employees, contractors, or suppliers is identified and reported confidentially and expeditiously investigated and remedied.	Our Whistleblower Policy applies to all employees, contractors, suppliers, and other stakeholders.

Board Oversight

As part of its mandate, Trican's Corporate Governance Committee reviews material corporate policies and makes recommendations to the Board for approval. Specifically, the Corporate Governance Committee, amongst other things, (i) provides oversight on governance issues, including Trican's policies, standards, disclosures, and compliance practices, and (ii) reviews, monitors, and reports to the Board on actions and initiatives undertaken by Trican to manage and mitigate risks.

In this regard, Trican's Corporate Governance Committee has oversight responsibility for the Policy's approval, implementation, and periodic amendment.

At the executive level, our Chief Operating Officer is responsible for supervising the incorporation of the Policy into our supply chain processes and procedures, with legal support from our VP, Legal, General Counsel and Corporate Secretary.

Pursuant to our internal governance systems, the Policy will be periodically updated and submitted to the Corporate Governance Committee.

Due Diligence

In the past year, Trican administered its annual *Supplier Certification of Compliance Form* (the “**Form**”) to its suppliers.

All suppliers are required to respond to questions including (i) confirmation of their understanding of the requirements of the modern slavery laws applicable in Canada, (ii) adoption and implementation of the Modern Slavery Act within their business operations, and (iii) whether there has been an instance of modern slavery or forced labour in their supply chain over the past year.

For the 2024 reporting year, we issued the Form to 824 suppliers, ~39.8% down from 2023. This resulted from further refining our supplier list to remove entities with whom Trican has “*very minor dealings*” pursuant to the *de minimis* exception to the application of the Modern Slavery Act. Of this number, suppliers representing 86% of Trican’s supply chain spend were compliant with Trican’s Modern Slavery Policy. An additional 4% of suppliers provided Trican with their corporate compliance policies. Taken together, 90% of suppliers complied with Trican’s Modern Slavery Policy relative to an 86% compliance rate in 2023.

Trican did not identify any instances of non-compliance or the presence of forced and child labour in any of the responses received from its suppliers for the reporting period.

Introduction of anti-forced labour and anti-child labour contractual clauses

Trican has developed contractual language, which we continue to incorporate into agreements and contracts with counterparties. Trican’s Standard Terms and Conditions are being updated to incorporate anti-forced and anti-child labour clauses.

In 2024, we observed an increase in customers who introduced anti-forced and anti-child labour clauses into their Master Services Agreements. In some instances, our customers have requested contract amendments to incorporate language on these clauses.

Further, in our review of customer contracts, we increasingly see customer representations and warranties regarding their compliance with anti-forced labour and anti-child labour laws. Where we observe such representations and warranties are not included, we highlight this to customers and request that they be included.

Customer Requests for Certification

In 2024, we received several customer requests to complete questionnaires on anti-forced labour and anti-child labour laws and certify compliance with such laws. These requests were predominantly received through the ComplyWorks platform.

PARTS OF TRICAN’S BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR OR CHILD LABOUR AND MITIGATION AND REMEDIATION MEASURES

Based on current assessments, Trican has not identified any parts of its business or supply chains that carry a risk of forced and/or child labour. Given that over 99% of our suppliers are in North America, we view Trican’s overall exposure to the risk of forced and child labour as minimal. However, Trican will continually monitor this exposure through its due diligence and annual supplier certification process.

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Trican's Whistleblower Policy, which provides an Ethics Hotline administered by an independent third party, is a mechanism for identifying, mitigating, and remediating risks, including forced labour and child labour risks. Trican continues to encourage its employees, contractors, suppliers, and other stakeholders to voice any concerns regarding our business conduct by using the Ethics Hotline or by mail (or other means of delivery) addressed to the Chair of the Audit Committee.

The Ethics Hotline remained active and accessible in 2024.

ASSESSMENT OF EFFECTIVENESS OF IMPLEMENTATION MEASURES

Given that the Modern Slavery Act is in its second year, we continue to monitor the effectiveness of the implementation measures introduced by Trican.

APPROVAL AND ATTESTATION

Approval

The Board of Trican approved this report pursuant to section 11(4)(a) of the Modern Slavery Act.


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 Trican Well Service Ltd. 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: Thomas M. Alford

Title: Board Chair

Date: May 15, 2025

Signature: 

I have the authority to bind Trican Well Service Ltd.