



Modern Slavery Report

Introduction:

This report is made by Steelhaus Holdings Inc. and its subsidiaries Steelhaus Technologies Inc., Steelhaus Technologies Canada Limited (collectively “**Steelhaus**”) in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Supply Chains Act**”) for the financial year commencing on January 1, 2024, and ending on December 31, 2024.

At Steelhaus, we are committed to acting ethically and with integrity in all our business dealings and relationships, promoting compliance with applicable laws and protecting the dignity and rights of all people connected to our business. We strive to work ever more closely with our suppliers to ensure their workforce and the workforce of their supply chains are treated with respect and dignity.

This is Steelhaus's second report under the Supply Chains Act. We recognize that stamping out modern slavery and modern slavery risks is a process that will take time. Our report outlines the measures we have in place and our continuing efforts to assess and address risks of modern slavery, including forced labour and child labour, in our business and supply chain.

Our Organisational Structure:

Steelhaus is a global leader in innovative energy solutions, providing products and services to oil and gas industries. Steelhaus Holdings Inc. is the parent company of Steelhaus Technologies Inc., Steelhaus Technologies Canada Limited. Steelhaus specializes in energy-related manufacturing, distribution, and technology solutions.

Our Operations:

Steelhaus boldly drives the market with practical field-proven experience, adaptable engineering, integrated manufacturing, and uncompromising safety with relentless delivery of unwavering customer service. We employ over 500 people and have operations worldwide. For more information about Steelhaus's operations, please visit [Steelhaus Technology Inc | Get Ahead in the Oil & Gas Industry \(steelhausinc.com\)](https://steelhausinc.com)

Our Supply Chains:

Our supply chain includes a global network of suppliers from Canada, the United States, and Asia. We source raw materials, components, and ancillary services like transportation and logistics. Key raw materials include steel, electronic components, and plastics.

**Modern Slavery Risk Profile:**

All our employees are located in Canada, where they are protected under fair and responsible employment practices. That being said, we recognize that certain risks may exist within our supply chains.

Risk Factors in our Supply Chains Include:

- **Sectors of Operation:** Manufacturing and oil field services.
- **Geographical Regions:** Primarily trusted local suppliers, with occasional international sourcing.

Our Policies on Modern Slavery:

In addition to its Code of Ethics and Business Conduct, Steelhaus has a comprehensive Child and Forced Labour Policy in place. Steelhaus's Child and Forced Labour Policy outlines our commitment to preventing and addressing child labour and forced labour within our organization and supply chain. Some key highlights of our Child and Forced Labour Policy include:

Minimum Employment Age:

Adherence to provincial and federal legislation regarding the minimum age for employment. No individual below the minimum age for employment will be employed.

Protection of Young Workers:

Additional protections are provided for employees under the age of 18 to ensure they are not subjected to hazardous work conditions, excessive working hours, or exploitation.

Forced Labour Prohibition:

We prohibit all forms of forced labour within our organization and supply chain. This includes but is not limited to debt bondage, human trafficking, slavery, and involuntary servitude. All employment relationships must be voluntary, and workers shall not be coerced, deceived, or exploited in any way.

Employee Reporting:

Steelhaus employees are encouraged to report any suspected instances of child labour or forced labour through designated channels, without fear of retaliation. Reports will be promptly investigated, and appropriate action will be taken to address violations.

Compliance and Enforcement:

Steelhaus complies with all relevant labour laws and regulations pertaining to child labour and forced labour, including Alberta's Employment Standards Code, Human Rights Act, and Occupational Health and Safety Act, Saskatchewan's Employment Standards Act, as well as federal legislation such as the Criminal Code and the Immigration and Refugee Protection Act. Non-compliance with the Child and Forced Labour Policy may result in disciplinary action, up to and including termination of employment or contract.

Continuous Improvement:



Steelhaus is committed to continuous improvement in our efforts to prevent and address child labour and forced labour. Steelhaus will regularly review and update our policies, procedures, and practices to ensure alignment with best practices and evolving legal requirements.

Steelhaus is dedicated to promoting ethical labour practices, protecting human rights, and contributing to the well-being of communities in Alberta, Saskatchewan and beyond. We believe that by upholding the principles outlined in our Child and Forced Labour Policy, we can create a workplace and supply chain that is free from exploitation and conducive to the dignity and empowerment of all individuals.

Due Diligence Processes:

Steelhaus enforces a strict code of compliance and does not tolerate slavery or human trafficking within its supply chains. We continually review and improve our approach to supplier due diligence to enhance our action plan against modern slavery risks.

Steelhaus expects its suppliers, contractors, and business partners to share its commitment to ethical labour practices and comply with all applicable laws and regulations regarding child and forced labour. We conduct due diligence on our supply chain to identify and address any potential risks of exploitation or abuse. We reserve the right to conduct additional verifications and audits to ensure adherence to our standards, as well as the right to terminate our relationship with any supplier that engages in modern slavery. We encourage all employees to report any suspected violation of our Child and Forced Labour Policy or our Code of Ethics and Business Conduct to our HR department in confidence.

Remediation Measures:

No instances of modern slavery or human trafficking have been identified within Steelhaus's business and supply chains and as such, no remediation measures were necessary.

Training and Awareness:

Steelhaus actively promotes awareness among its employees of their responsibilities regarding child labour and forced labour. In addition, new employees are required to read and acknowledge their understanding of the Child and Forced Labour Policy upon onboarding.

We are currently developing formal training to ensure our employees are aware and capable of recognizing and reporting the risks of modern slavery and human trafficking.

Effectiveness in Combatting Modern Slavery Risks:

At Steelhaus, we actively monitor the effectiveness of our actions to prevent and reduce the risk of modern slavery in our operations through relevant performance indicators measured during regular site rounds, which are conducted approximately four times per week, across all shops. These rounds allow us to observe working conditions firsthand and address concerns proactively.

Our health and safety checks include identifying potential red flags such as signs of coercion, fatigue, or unusual behaviour.

Additionally, Steelhaus maintains multiple accessible reporting channels, including an open-door policy with management, safety, quality, and supervisory staff, as well as digital platforms for submitting hazard ID's, improving ideas, and other concerns. These mechanisms support early



identification and resolution of issues, reinforcing our commitment to ethical operations and employee well-being.

As we explore and implement further measures to prevent and mitigate modern slavery risks in our supply chains, we will adapt and improve our methods to assess the effectiveness of any actions taken.

Approval of the Report:

This report was approved by the Board of Directors of Steelhaus pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 26, 2025.

A handwritten signature in black ink, appearing to read 'M. George', is positioned above the printed name and title.

Mike George
CEO

Date: May 26, 2025