



Report on Measures Against Forced Labour and Child Labour for Year Ended
December 31, 2025

March 11, 2026

STEP Energy Services Ltd. ("STEP", the "company", "us", "our" or "we") publishes this report pursuant to Section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the "Act") in respect of the year ended December 31, 2025.

STEP STRUCTURE AND SUPPLY CHAIN OVERVIEW

Formerly listed on the TSX, STEP transitioned to a privately held corporation on December 15, 2025. The company, incorporated under the laws of the Province of Alberta and headquartered in Calgary, operates through its direct and indirect subsidiaries active in Canada and the United States. STEP and its subsidiaries provide industry leading deep-capacity coiled tubing, fluid and nitrogen pumping, and hydraulic fracturing solutions to energy-sector clients. These operations rely on a broad array of products procured from a diverse group of suppliers. Such purchases largely consist of (but are not limited to):

- proppant (sand) for hydraulic fracturing operations;
- chemicals and nitrogen for use in hydraulic fracturing, fluid pumping and industrial services operations; and
- equipment for use in all operations, including tractors (trucks), trailers, pumps, parts, tubing/pipe, electronics, and tires.

Required products are sourced from both domestic (Canada and the United States) and international suppliers. In evaluating suppliers and potential suppliers, we consider reliability, product quality, price, delivery terms and location, product guarantees/warranty, operational costs, support offering, reputation, and financial stability.

COMMITMENT

Integrity, trust, responsible sourcing, and the safety and well-being of workers across our supply chain are of paramount importance to STEP. STEP stands against all forms of human exploitation, including forced labour and child labour. We have taken, and will continue to take, measures to prevent such abuses in our supply chain as further set out herein. Meeting this commitment can only be achieved by actively partnering with our suppliers to improve sourcing standards and global supply chain practices.

MEASURES TAKEN IN 2025

In 2025, STEP took the following measures to prevent and reduce the risk of forced labour and child labour within its supply chain:

1. STEP implemented a Supplier Code of Conduct (the "Supplier Code") in 2023. As part of our onboarding and ongoing compliance processes, all suppliers are required to sign an acknowledgment confirming adherence to the Supplier Code or to an equivalent policy with obligations therein that meet or exceed those contained in the Supplier Code. The majority of suppliers have returned their signed acknowledgments. The Supplier Code establishes the standards with which all STEP's suppliers must comply, including:
 - (a) each supplier's responsibilities regarding its own supply chain;
 - (b) reporting of violations of the Supplier Code;
 - (c) slavery, human trafficking, and forced labour prohibitions;
 - (d) worker compensation expectations; and

(e) non-discrimination and anti-harassment obligations.

2. STEP introduced provisions into certain of its supplier contracts that require the supplier to comply with STEP's Supplier Code, including the forced labour and child labour prohibitions therein (or comply with the supplier's own equivalent policy provided the obligations therein meet or exceed those set out in the Supplier Code).

STEP has not identified any instances of forced labour or child labour within its supply chain. As such, STEP did not take remedial measures in 2025 with respect to forced labour or child labour, or measures to remediate the loss of income resulting from any measure taken to eliminate the use of forced labour or child labour. STEP measures its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chain by: (i) assessing qualitative and quantitative information gathered through meetings with suppliers and from supplier responses and feedback to STEP's Supplier Code; and (ii) tracking relevant performance indicators, such as the number of professionals that receive training in regards to STEP's Supplier Code and any instances of non-compliance with the Supplier Code should they be reported through the Supplier Code's various reporting mechanisms.

STEP's Legal team provides periodic training to the members of STEP's Supply Chain team regarding STEP's Supplier Code and the Act, though no such training was provided in 2025.

RISK AREAS

Based on STEP's review of its supply chain, STEP believes the greatest risk of forced labour and child labour in its supply chain originates from products sourced outside of Canada, the United States and Europe. STEP has engaged, and will continue to engage, with critical suppliers (particularly those who import goods) to confirm their understanding of STEP's Supplier Code and to understand how they intend to comply with the requirements of the Supplier Code.

REPORTING

STEP's Supplier Code strongly encourages any person who becomes aware of any violation of the Supplier Code, including any form of exploitation within STEP's supply chain, to report the activity through STEP's third-party whistleblower administrator, IntegrityCounts, as soon as possible. The Supplier Code allows reports to be made with IntegrityCounts through any of the following:

Online: <http://www.integritycounts.ca/org/stepenergyservices>
E-mail: step-es@integritycounts.ca
Phone: 1-866-921-6714
Fax: 1-604-926-5668
Mail: IntegrityCounts
Re: STEP Energy Services
PO Box 91880
West Vancouver, British Columbia Canada V7V 4S4

APPROVAL AND ATTESTATION

This report has been approved by STEP's Board of Directors. In accordance with the requirements of the Act, and in particular Section 11 thereof, I, in my capacity as a Director of STEP, 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.

A handwritten signature in black ink, appearing to read "Steve Glanville". The signature is fluid and cursive, with the first name "Steve" and last name "Glanville" clearly distinguishable.

Steve Glanville

Director & Chief Executive Officer

I have the authority to bind STEP Energy
Services Ltd.

March 11, 2026