MODERN SLAVERY POLICY

Owner:	Chief Operating Officer	**Number:**	LG.32.1.00
Approvers:	Board of Directors	**Approval Date:**	November 9, 2023

1 Purpose

Trican is dedicated to preventing and reducing the risk of the use of forced labour and child labour in its supply chain activities. By ensuring that our supply chain activities screen for and reduce the use of forced labour and child labour, we will not only be compliant with the Federal Government's requirements enacted in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2023* (also known as the "**Modern Slavery Act**") but also it will advance our collective vision of providing safe and efficient service to our customers.

Our goal is to ensure that we put in place reasonable measures that will enhance due diligence in our supply chain activities, facilitate our legal reporting requirements and ultimately help mitigate the risk of the use of forced labour and child labour in supply chains.

At Trican, we are opposed to all forms of forced labour and child labour in our supply chain activities. Through the adoption and implementation of this *Forced and Child Labour in Supply Chain Policy* (the "**Policy**"), we will use our best endeavours through our due diligence process and reporting obligations to ensure forced labour and child labour are avoided and/or reduced in the supply of the goods and services that we procure from our suppliers and that we provide to our clients.

2 Objective

To ensure that Trican has adequate procedures in place to manage the risk of the use of Forced and Child Labour in its supply chain and can demonstrate compliance with the requirements of the Modern Slavery Act.

3 Definition of "Forced Labour" and "Child Labour"

Forced Labour

"Forced Labour" means labour or service provided or offered to be provided by a person under circumstances that:

i) Could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or

ii) Constitute forced or compulsory labour as defined in Article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

Child Labour

"Child labour" means labour or services provided or offered to be provided by persons under the age of 18 years and that:

i) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;

ii) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;

iii) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or

iv) constitute the worst forms of child labour as defined in Article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

4 Key Principles

Due Diligence

Trican shall implement a due diligence process by incorporating the questionnaire attached to this Policy as *Schedule "A"* to its tendering and bidding processes and procedures as part of its supplier evaluation process.

Training

Trican shall institute a training program and annual refresher for its employees engaged in the procurement process and shall communicate the Policy across its organization.

Compliance Statement in Contracts

Trican shall amend its contracting documents including its standard Master Services Agreement to include this statement: "Contractor and Contractor Related Parties shall not engage in any behaviour related to slavery, unlawful child labour, exploitation of children, forced labour or human trafficking."

Enforcing Compliance

Suppliers must certify compliance by completing the Supplier Certification of Compliance form in Schedule "A". Trican shall review the responses provided by a supplier, and where there is an indication of a violation, a potential violation or a gap in approach, suppliers shall work with Trican to resolve such violations, potential violations or gaps and suppliers shall undertake to take reasonable measures to comply with this Policy and the Modern Slavery Act.

Failure or violation by a supplier to comply with this Policy and the Modern Slavery Act may result in disciplinary actions up to and including termination of contracts and subsequent disqualification of certain products/services or as a supplier of Trican.

Annual Reporting

Every year, the Chief Operating Officer or their designee must prepare an annual report (the "**Annual Report**"), which must contain:

i) Trican's organizational structure, activities, and supply chains;

ii) Trican's policies and due diligence processes in relation to forced labour and child labour;

iii) a description of the parts of the business and supply chain that are exposed to the risk of the use of forced labour and/or child labour and the steps taken to assess and manage those risks;

iv) measures taken to remediate any identified forced labour and/or child labour;

v) measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour and/or child labour in Trican's activities and supply chain;

vi) training provided to employees on the requirements of this Policy and applicable law; and

vii) a description of the process for assessing the effectiveness of this Policy.

Approval and Attestation of the Annual Report

The Annual Report must be approved by management.

The approval of the Annual Report shall be attested to by a designated member of management in the form attached to the Policy as Schedule "B". The approved Annual Report shall be filed by the General Counsel and Company Secretary with the Minister of Public Safety and Emergency Preparedness by May 31st each year.

Accessibility of the Annual Report

A copy of the Annual Report shall be published on Trican's website.

5 Responsibilities

Composed entirely of independent board members, Trican's Corporate Governance Committee oversees the Corporation's governance policies, including sustainability and ESG matters, and recommends to the Board for approval any amendments to these policies.

In fulfilling this aspect of its mandate, the Governance Committee:

i) provides oversight on governance issues, which includes 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 governance risks.

Accordingly, the Corporate Governance Committee will have oversight responsibility for the approval, implementation, and periodic amendment of this Policy.

The Chief Operating Officer shall supervise the incorporation of this Policy into Trican's supply chain processes and procedures.

6 Reference Documents

i) Fighting Against Forced Labour and Child Labour in Supply Chain Act, 2023

ii) Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930

iii) Child Labour Convention, 1999, adopted at Geneva on June 17, 1999

7 Revision History

REV.	DOCUMENT STATUS	REVIEWER	APPROVER	DATE
1.	Effective Date	Legal	Board of Directors	11/09/2023