

IDENTIFYING INFORMATION

For the purposes of Bill S-211 reporting, SECURE Energy Services Inc. (“SECURE”) is an entity. Information contained within this report covers the period from January 1 -December 31, 2023. SECURE’s business number is 857 304 323. This report covers activities and actions for all SECURE entities, including:

- SECURE Energy Services Inc.,
- SECURE Energy (Drilling Services) Inc.,
- SECURE Energy Inc.; and
- SECURE Energy.

All of these entities report into a single senior leadership team (President & CEO, COO and CFO) and are internally governed by the same operating practices, policies, and procedures.

SECURE is a leading waste management and energy infrastructure business headquartered in Calgary, Alberta. SECURE is a publicly traded company that trades on the Toronto Stock Exchange. It has 1,924 permanent employees and operates an asset network in western Canada and the state of North Dakota which includes waste processing and transfer facilities, industrial landfills, metal recycling facilities, crude oil and water gathering pipelines, crude oil terminals, and storage facilities. The majority of SECURE’s employee base (99%) is in Canada.

SECURE does not conduct business in any other countries, like the United Kingdom or Australia, where modern slavery, forced labor or child labor reporting is required.

Additional details on the company can be found on pages 13 and 14 of our 2023 Sustainability Report ([secure-2023-sustainability-report.pdf \(secure-energy.com\)](#))

POLICIES

In 2023 SECURE released its first Human Rights Policy ([Human Rights Policy - May 5, 2023 Final.pdf \(secure-energy.com\)](#)) which addresses modern slavery, forced labor and child labor and aligns with Bill S-211 requirements. In 2024, a fulsome review of SECURE’s Supplier Code of Conduct ([secure-energy-supplier-code-of-conduct.pdf \(hubspotusercontent10.net\)](#)) will be completed to ensure further alignment with Bill S-211. SECURE is also considering including terms and conditions around forced and child labor into its supplier contracts.

Additional details can be found on pages 77 and 83 of SECURE’s 2023 Sustainability Report. [secure-2023-sustainability-report.pdf \(secure-energy.com\)](#)

RISK ASSESSMENT and DUE DILIGENCE

SECURE's Operations

SECURE's operations occur within Canada and the state North Dakota. SECURE requires all employees and contract employees to be over the age of 18 and to be legally eligible for work in Canada or the United States. Both criteria are verified at the time of hire. SECURE's procedures, practices and policies are compliant with Canadian or U.S. labor law requirements. Employees are covered under overtime agreements and overtime is voluntary.

SECURE's Supply Chain Mapping and Assessment Process

SECURE used the following process for mapping and assessing its supply chain:

1. Identification of suppliers that were considered high-risk based on the countries they operate in and/or the products they supply. Any suppliers that fall into this category will be targeted for audits and site visits.
2. Conducting a multi-phase online screening program for all suppliers that are not identified as high-risk. The phases for the supplier screening program were determined based on specified spending amounts and/or the frequency of use. Suppliers with higher spending and/or more frequent use were prioritized to be screened earlier. The screening program requires suppliers to complete an online Supplier Screening Questionnaire that was internally developed.
3. Anything detected during screening will trigger additional follow up which includes additional questions or an over the phone interview and if deemed necessary, an audit and site visit.
4. Suppliers that have been screened and audited will continue to be monitored.

SECURE's review of its supply chain identified that importation of base products (chemicals) and materials used for facility construction were the areas of highest risk. Four suppliers were identified with a high potential risk for using forced labor or child labor based on geography and the Global Slavery Index ([Global Slavery Index | Walk Free](#)). Three of these vendors are located in China and one is located in South America.

The Chinese vendors supply base chemicals for SECURE's Specialty Chemical business, and the South American vendor is a global company that supplies pipe and base components for process equipment that SECURE uses to build and upgrade its waste management and energy infrastructure operations.

Supply Chain Assessments

Two of the suppliers, located in China, were audited and their sites were inspected in person by SECURE personnel in the fourth quarter of 2023. No presence of modern slavery or child labor was detected through the audit or site inspection. These suppliers will continue to be monitored periodically with reassessment planned in the future. The third Chinese supplier could not be visited because inclement weather prohibited travel to the site. The audit of this supplier will be rescheduled in the future as will the audit of the South American supplier.

The multi-phased online Supplier Screening Questionnaire process was also initiated in the last half of 2023 with additional tranches scheduled in the first quarter of 2024. Results from the screening questionnaire will be reviewed in 2024 and any suppliers identified as at risk through the screening process, will be further assessed either through an additional questionnaire or an interview and if necessary, an audit.

Of the 392 suppliers that have already completed the online Supplier Screening Questionnaire, only 7.3% conduct any business outside North America and 43.6% of the suppliers reported that they already have an anti-modern slavery policy in place.

Additional details can be found on pages 80-83 of SECURE's 2023 Sustainability Report.

[secure-2023-sustainability-report.pdf \(secure-energy.com\)](#)

REMEDIAL ACTIONS

In SECURE's assessment work to date, there has been no detection of forced labor or child labor so no remedial action is required.

SECURE intends to work with any suppliers identified as high risk to develop remedial plans or replace them with other, lower risk suppliers, if necessary. Working with suppliers includes the development and implementation of a remedial plan. The remedial plan may also include measures to remediate the loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced labor or child labor in its activities and supply chain.

TRAINING

SECURE developed an online training module that educates and creates awareness on all forms of modern slavery, including forced and child labor. The training also highlights where modern slavery is present and why there has been an increased focus and desire to eliminate these labor practices worldwide.

This training is available for all SECURE employees and contract employees, but is mandatory for all:

- senior leadership (C-Suite, Vice Presidents, Directors and SECURE's Board of Directors),
- members of the ESG Team; and
- anyone who makes purchasing and procurement decisions.

In 2023 the completion rate for those mandated to complete the training was 96% and is mandated for approximately 10% of all employees.

Additional details can be found on pages 81 of SECURE's 2023 Sustainability Report.

[secure-2023-sustainability-report.pdf \(secure-energy.com\)](#)

EFFECTIVENESS and MONITORING

SECURE will develop KPIs or other indicators to assess the effectiveness of the measures it has undertaken to identify and reduce forced and child labor in its supply chain.

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 the entity of entities 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 have the authority to bind SECURE Energy Services Inc.



Rhonda Rudnitski
VP ESG
May 30, 2024