



## **Report on Measures Against Forced and Child Labour in Supply Chains For the Year Ended June 30, 2024**

This report is made pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour in the Supply Chains Act.

Element Technical Services Inc. (“Element” or the “Company”) is committed to respecting human rights by preventing modern slavery in our own operations and supply chains and expect our suppliers to share this commitment.

### **Structure, Activities, and Supply Chains**

This report has been prepared as a joint report. Element was incorporated on September 27, 2010, under the laws of the province of Alberta and operates under the trade names Element Technical Services, Essential Coil Well Service and Tryton Rentals. Element also has a subsidiary that operates in the United States, Element Technical Services LLC.

Element’s core business is oilfield services including the operation of specialized fracturing stimulation, coil tubing services and fluid and nitrogen pumpers in Western Canada as well as the state of Wyoming in the United States.

Our direct suppliers are predominantly located in North America. Element procures goods and services only from financially stable, technically qualified, and reliable sources. We require that our suppliers comply with the laws and regulations in their jurisdiction, or with industry guidelines where they exist and are more stringent than the local law.

Element purchases consist mainly of (but not limited to):

- Raw materials such as fracturing sand, chemicals, nitrogen, and fuel
- Oilfield equipment, trucks, component parts, tubing, electronics, and tires

## **Policies and Due Diligence**

Subsequent to June 30, 2024, Element has approved a Modern Slavery Policy. The key principals of this policy are preventing modern slavery in our own operations and our supply chain, training, and compliance.

Element is committed to respecting Human rights as a fundamental principle in our operations. The Company does not utilize forced or child labour. All employees of the Company are recruited and provided with working conditions that comply with all applicable laws and regulations.

With regards to the Company's supply chain, we seek to collaborate with suppliers who share our commitment to respecting human rights. Element expects our suppliers to comply with all applicable laws with respect to their employees and impose similar expectations on their subcontractors and suppliers.

## **Risk of Forced or Child Labour**

### **Element Operations**

Our staff are predominantly oil and gas professionals, operators and administrative workers located in Canada and the United States. We are satisfied that, as a result of the recruitment, remuneration and human resource practices implemented throughout our operations, there is low risk that our Staff are at risk of modern slavery.

### **Supply Chain**

As the vast majority of our direct suppliers are located in North America and comply with laws and regulations in the province, state, or country where they operate, we believe our direct supplier risk is low. We believe that we procure products and services from high quality and high integrity suppliers. However, we recognize the potential for labour violations in our supply chain. In 2023, we focused on our direct suppliers with a supply chain we knew extended beyond North America. Building on this in 2024, we are now reviewing all suppliers and assessing them with a risk category from 1 to 3 based on geographic location, product, and industry. Based on this risk assessment, we have requested a self-assessment questionnaire from level 1 and an attestation statement from level 2 and 3 suppliers. To date, we have no indications that forced or child labour is being used by our suppliers.

## **Measures Taken to Remediate any Forced Labour or Child Labour**

Our analysis of our supply chain does not indicate that forced or child labour is being used, therefore we did not take any measures to remediate the use of forced or child labour.

## **Measures Taken To Remediate the Loss of Income to the Most Vulnerable Families that Result from any Measures taken to Eliminate the Use of Forced or Child Labour in our Activities or Supply Chains**

Our analysis of our supply chain does not indicate that forced or child labour is being used, therefore we did not take any measures to remediate loss of income to the most vulnerable families as a result of the elimination of the use of forced or child labour.

## **Training Provided to Employees**

The Modern Slavery Act has raised awareness of the potential use of forced or child labour in our industry with our employees. We are committed to providing any training necessary to employees engaged in the procurement process.

## **Assessment of Effectiveness**

We have established a Modern Slavery Policy and believe our existing practices protect our employees and contractors and the risk of modern slavery in our operations. We select suppliers and services providers who are reputable and comply with domestic and international laws. We will continue to assess suppliers and are committed to following our industry's best practices.

## **Approval and 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 or 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.

*(signed) "Brendan Nelson"*

**Brendan Nelson**  
**CFO**

May 27, 2025

I have the authority to bind Element Technical Services Inc. and its subsidiaries