



Swagelok Edmonton | Drayton | Fort McMurray

Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

This report is made pursuant to subsection 11(2) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C., 2023, c.9 (the Act) and has been prepared on behalf of Edmonton Valve Inc. Corporate integrity, responsible product sourcing, and the safety and well-being of workers across the global supply chain are of paramount importance to Edmonton Valve & Fitting Inc.

Forced labour and child labour are forms of modern slavery, which are a crime, and violation of fundamental human rights. We recognize and respect human rights. Edmonton Valve & Fitting Inc. has a zero-tolerance approach to Modern Slavery in all its forms, and we are committed to acting ethically and with integrity in all business dealings and relationships. We have also implemented and will enforce effective systems and controls to ensure Modern Slavery is not taking place anywhere in Edmonton Valve & Fitting Inc's business or in its supply chains.

As required by the Act, this report summarizes the steps that we have taken in the financial year ended December 31, 2024 to prevent and reduce the risk that forced labour or child labour is used at any step of the domestic/international sourcing of goods imported into Canada by Edmonton Valve & Fitting Inc.

Scope

This policy applies to all persons working for or on behalf of Edmonton Valve & Fitting Inc. in any capacity regardless of location or role, including (but not limited to) associates at all levels, leadership, agency workers, external consultants, third-party representatives, supply chain participants and business partners.

Please read this Policy carefully and openly and make every effort to understand the importance of preventing Modern Slavery and the ways we can strive to accomplish these objectives together. Companies and contractors with which Edmonton Valve & Fitting Inc. does business are expected to adopt this Policy or have and enforce a policy which meets or exceeds the requirements of this Policy.

This Policy is to be read in conjunction with Swagelok's Supplier Code of Ethics, Swagelok's Code of Conduct, and any additional requirements in those documents must also be followed.

Definitions

For the purposes of this Policy, the following terms have the following meanings:

"Act" means the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada).

"Modern Slavery" means collectively Forced Labour and Child Labour

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

- Are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.



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- Are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to them.
- 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.

“Forced Labour” means labour or service provided or offered to be provided by a person under circumstances that 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.

Examples of Modern Slavery

Modern Slavery can be found in almost every country in the world. Vulnerable persons such as children, women, workers who have traditionally been discriminated against, migrant workers, workers with uncertain immigration status, and rural workers, and illiterate workers are the most at risk of being exploited through Modern Slavery.

Some examples of Modern Slavery include, but are not limited to:

- Human trafficking.
- Debt bondage and exploitative labour contracts.
- Sale or exploitation of people.
- Debt-induced forced labour.
- Forced labour in prisons; and
- Coercion or deception in employment.

Objective

This Policy sets out Edmonton Valve & Fitting Inc's commitment to:

- Responsibly source goods or services to use in its business.
- Ensure there is transparency the approach to tackling Modern Slavery in Edmonton Valve & Fitting Inc's business and throughout its supply chains.
- Take action to prevent, mitigate and where appropriate, remediate the harm caused by Modern Slavery occurring in Edmonton Valve & Fitting's business or supply chains.
- Comply with applicable laws and regulations about Modern Slavery including under the Act.

Policy

Edmonton Valve & Fitting Inc. is firmly committed to eradicating Modern Slavery from its operations and supply chain. It is our policy to strictly prohibit any form of Modern Slavery, including forced labor, human trafficking, and child labor, at any stage of the production process or within the operations of our suppliers and their partners.

We do not engage in business with any supplier that uses, or is reasonably suspected of using Modern Slavery, whether directly or indirectly. This applies to all tiers of the supply chain.

To uphold this commitment, we regularly assess Modern Slavery risks and perform due diligence to ensure compliance throughout our supply chain. If there is a suspicion that a supplier or any of its subcontractors or business partners is involved in Modern Slavery, we will conduct a thorough



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investigation. Should we find credible evidence, appropriate corrective action will be taken, including the potential termination of the business relationship.

Due Diligence & Mitigation Measures

As part of our approach to identifying and preventing Modern Slavery, we implement the following measures:

Supplier Vetting

- All new and existing suppliers are evaluated for Modern Slavery risks in accordance with our Business Partner Due Diligence Policy.
- This includes the use of questionnaires, on-site inspections, and other relevant assessments.

Risk-Based Screening

- We review proposed purchases against a risk matrix that includes high-risk product categories and source countries known for Modern Slavery concerns.

Audits

- We conduct both scheduled and unannounced audits of suppliers' operations.
- Audits may be performed by Edmonton Valve & Fitting Inc. personnel, qualified third-party auditors, or both.

Supplier Code of Conduct

Suppliers must acknowledge and adhere to our Supplier Code of Conduct, which requires them to:

- Ensure that neither they nor any entity in their supply chain engages in Modern Slavery.
- Maintain reliable systems to verify worker eligibility, including legal status and age.
- Promptly report any known or suspected violations of the Code, including instances of Modern Slavery.

Contractual Obligations

Our contracts and purchase orders include terms requiring suppliers to:

- Refrain from using any form of Modern Slavery, including within their own supply chains.
- Conduct appropriate due diligence and maintain verification systems regarding worker eligibility.
- Where applicable, certify that goods provided to us are not produced using Modern Slavery.
- Cooperate fully with investigations initiated by Edmonton Valve & Fitting Inc. related to suspected Modern Slavery.
- Provide Modern Slavery training to their employees and supply chain partners.
- Accept consequences for non-compliance, including cancellation of orders and termination of contractual agreements.

Through these efforts, Edmonton Valve & Fitting Inc. reinforces its commitment to ethical sourcing and human rights across all aspects of its operations.



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Supplier Standards

We expect the same high standards from all suppliers, contractors, and other business partners within Edmonton Valve & Fitting Inc.'s supply chains as outlined in the above sections. We expect that suppliers will hold their own suppliers to the same standards.

Roles and Responsibilities

Associates are responsible for:

Preventing, detecting, and reporting Modern Slavery is a shared responsibility between Edmonton Valve & Fitting Inc.'s suppliers, Edmonton Valve & Fitting Inc. Supervisors and Leadership, and Edmonton Valve & Fitting Inc.'s associates.

Suppliers are responsible for:

- Ensuring their associates, contractors, and suppliers involved in the supply of goods or services to Edmonton Valve & Fitting Inc. understand and comply with this Policy.
- Training their associates, contractors, and suppliers about the risks of Modern Slavery.
- Refraining from directly or indirectly using Modern Slavery.
- Refraining from directly or indirectly benefitting from or contributing to Modern Slavery.
- Complying with Edmonton Valve & Fitting Inc.'s requests for information about their supply chains and practices such as completing supplier questionnaires, participating in audits, and completing statutory declarations certifying they do not use or benefit from Modern Slavery.
- Reporting any risks of Modern Slavery, they identify in their business or supply chains as described in the reporting mechanism below.

Awareness and Training

Suppliers:

Edmonton Valve & Fitting Inc. is committed to addressing Modern Slavery within its operations and supply chains. This commitment will be clearly communicated to all contractors and suppliers at the beginning of our business relationship and reinforced as necessary thereafter, including through specific contractual obligations. Suppliers are expected to ensure their workforce receives adequate training on identifying Modern Slavery practices and recognizing areas of risk within their own operations and supply chains. In addition, Edmonton Valve & Fitting Inc. will work to provide Modern Slavery awareness training to its direct high-risk suppliers, and, where feasible, to high-risk suppliers further down the supply chain.

Associates:

Edmonton Valve & Fitting Inc. will deliver regular training to relevant associates on this Policy. The training will focus on recognizing Modern Slavery practices and understanding which areas of the company's business and supply chains are most susceptible to such risks.

Reporting Non-Compliance:

Everyone is encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of Edmonton Valve & Fitting Inc.'s business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the business, or any tier of the supply chains constitutes Modern Slavery, raise it with the



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company President. Associates can also talk to their Supervisor, Leader, or a member of the Human Resources Team who will support associates with reporting the matter.

Related Documents:

[Swagelok Supplier Code of Ethics](#)

https://www.swagelok.com/-/media/about/about-us-2024/swagelok-code-conduct_en.ashx

Attestation In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that Edmonton Valve & Fitting Inc. Inc. has reviewed the information contained in the report. 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.

Dan Constantin

Dan Constantin

Supply Chain Manager, on behalf of Edmonton Valve & Fitting Inc.

May 12, 2025