## Forced Labour and Child Labour Report

April 1, 2024 – March 31, 2025





## Introduction

For more than 60 years, Stream-Flo Industries Ltd. has been a leading Canadian manufacturer, supplier, and service provider of products for the energy industry in North America and globally. Stream-Flo is dedicated to building long-term partnerships with our customers, suppliers, employees and communities while offering customized solutions to address complex industry challenges.

Stream-Flo's guiding principles are Health, Safety, Environment, Integrity, Quality, Innovation, Independence and Growth. We are committed to conducting our business activities in an ethical, legal, safe, environmentally and socially responsible manner.

We are fortunate to have established long-term relationships, built on foundations of trust and transparency, with many of our carefully selected suppliers. Even so, Stream-Flo recognizes the risks of forced labour and child labour in corporate supply chains and has implemented new policies and procedures in the preceding year, in addition to existing policies and procedures, to prevent and further reduce those risks by:

- Enhancing employee awareness of forced and child labour risks in the supply chain through the delivery and monitoring of employee training;
- Broadening protections for individuals within the organization who report misconduct, including forced and child labour, by providing multiple secure reporting channels and strengthening protections against retaliation;
- Establishing more robust policies addressing bribery, corruption, conflicts of interest and compliance with trade and sanctions laws;
- Introducing a Compliance Certificate requiring all suppliers to confirm, among other commitments, that they do not engage in forced and child labour, and subsequently monitoring and tracking the completion of such certificates; and
- Using in-person meetings with key suppliers as an opportunity to confirm suppliers' understanding of and compliance with forced and child labour laws.



## Our structure and business activities

Stream-Flo is a privately owned, Canadian company, headquartered in Edmonton, Alberta. Stream-Flo manufacturers, sells and services wellheads, gate valves, check valves and surface safety valves for the energy industry. We operate three core business units: wellheads, valves, and after-market services. Our organization's success depends upon the professionalism and dedication of our skilled workforce, which comprises over 1200 employees worldwide.

Stream-Flo is the parent company of Master Flo Valve Inc, which specializes in the manufacture and sale of surface and subsea flow management solutions. Stream-Flo has centralized certain of its corporate and administrative functions within the organization to facilitate the support of its, and Master Flo's, core business units and global operations. This centralized approach allows for consistency in processes across the organization.

This report is filed by Stream-Flo Industries Ltd.

## Our supply chain

Stream-Flo relies upon an expansive network of suppliers, consisting of approximately 955 active global suppliers, primarily in North America and Asia, to source the various materials, parts, components and other goods and services needed to manufacture and sell Stream-Flo equipment to customers in the energy industry. Global Sourcing, Quality Assurance and Supply Chain (collectively referred to as "Sourcing") are centralized corporate functions that work together to carefully select suppliers who meet our qualification standards and corporate requirements. Our Sourcing team tracks key supplier metrics including performance history, competencies, opportunities for improvement and non-conformances.

# Our policies and due diligence processes

### Our policies

Stream-Flo communicates our values and expectations through our policies, which demonstrate our commitment to ethical and socially responsible business conduct. Stream-Flo's *Supplier Code of Ethics* ("Supplier Code") and Business Conduct and Social Responsibility Policy ("Social Policy") reinforce our position against the use of modern slavery and provide a framework for ensuring all individuals within our organization and supply chain are treated with dignity and respect. All Stream-Flo employees are required to undergo mandatory annual online training on the Supplier Code and Social Policy to ensure they are familiar with these policies and to reinforce Stream-Flo's expectations of both employees and suppliers regarding business conduct.

Stream-Flo's Supplier Code addresses the risk of child labour and forced labour in our supply chain. It requires our suppliers to operate in a socially responsible and non-discriminatory manner, adhere to governing laws and regulations, and promote safe business practices that are respectful of the human rights of workers. The Supplier Code applies to all our suppliers and is incorporated into our contractual requirements. In addition to other specific protections for workers, the Supplier Code includes the following requirements:

- Suppliers must meet or exceed the minimum standards set out in the Supplier Code relating to compliance with laws, ethical business practices, treatment of workers, and health and safety practices.
- Suppliers must ensure compliance with the Supplier Code throughout their operations and supply chain, including by their suppliers, vendors, subcontractors and agents.
- Suppliers must ensure all labour is voluntary and is not forced labour, child labour, trafficked labour, bonded labour, modern forms of slavery, indentured labour or prison labour.





- Suppliers must ensure that workers are not under the minimum working age or local compulsory school age.
- Suppliers must respect the human rights of workers, treat workers with dignity and maintain a safe, healthy and respectful workplace.
- Suppliers must report any non-compliance or violation of the Supplier Code, and any retaliation by a supplier against a whistleblower will not be tolerated.

The expectations in the Supplier Code are reinforced by our Social Policy, which also addresses the issue of modern slavery. Our Social Policy makes it clear that Stream-Flo does not tolerate any form of child labour, forced labour, slavery or human trafficking; is committed to conducting all operations in a manner that is consistent with upholding human rights; and, expects all business partners and suppliers to share a similar commitment. Both the Supplier Code and Social Policy set out a process for reporting violations.

#### Our due diligence processes

#### i. Onboarding Evaluation and Risk Assessment

Sourcing is a centralized function within Stream-Flo that is responsible for the supply chain management process across our organization. Key suppliers must be onboarded and placed on Stream-Flo's approved vendor list (AVL) to be used in our supply chain. The onboarding process is conducted in accordance with our corporate quality standards, which require an initial evaluation and risk assessment of the supplier prior to their selection or approval for placement on the AVL.

Our Sourcing team evaluates suppliers based on various criteria, including their commitment to identifying and eliminating forced labour and child labour throughout their operations. Suppliers placed on our AVL are continuously evaluated, screened and monitored to ensure compliance with our corporate quality standards. Stream-Flo uses one or more of the following methods to collect information about the supplier: interviews, documentation reviews, questionnaires, checklists and audits. The information collected during the onboarding process is designed, in part, to allow Stream-Flo to ascertain the supplier's:

- adherence to relevant laws, regulations, and standards;
- process controls, including their ability to monitor and manage conditions within their organization and supply chain, to meet or exceed Stream-Flo's expectations and requirements;
- commitment to the safe and healthy working conditions of workers and treatment of workers with respect and dignity;
- commitment to upholding human rights and rejecting forced or child labour; and
- compliance with Stream-Flo's policies and procedures, including those related to health, safety and environment and corporate social responsibility.

Stream-Flo aims to conduct on-site audits of all key suppliers. As part of the audit process, the supplier is evaluated on Corporate Social Responsibility factors, which include factors related to forced labour and child labour. Any failure by a supplier to operate in a socially responsible manner must be brought to the immediate attention of the Supply Chain Manager. Our supply chain auditors are aware that such violations are treated with the utmost seriousness.

#### ii. Ongoing Supplier Management

In 2024, Stream-Flo introduced a Compliance Certificate requiring suppliers to certify, among other commitments, that they do not use forced or child labour, and affirm their commitment to reducing the risk of such practices within their operations and supply chains.

Once a supplier has been onboarded and added to the AVL, Stream-Flo continues to manage and reduce risks throughout its relationship with the supplier by conducting biannual risk assessments, at a minimum, and comprehensive audits in accordance with our corporate quality standards. Stream-Flo also conducts due diligence by using databases and monitoring applicable literature, including the International Child Labour & Forced Labour (ILAB) Report, to identify and evaluate risks of forced labour and child labour within Stream-Flo's supply chain.

If a potential concern is flagged or a non-conformity is identified with respect to one of our suppliers, our Sourcing team reviews the matter and if appropriate, recommends mitigating measures or corrective actions, which may include termination of the business relationship.

#### iii. Reporting of Violations

Stream-Flo fully endorses and values open and honest communication with respect to the reporting of potential misconduct or violations of law or policy. If a Stream-Flo employee becomes aware of a concern involving forced or child labour, they must report it to their manager or supervisor without delay. Third party workers who identify or suspect any potential misconduct or violations of law or policy, must report it directly to *info@streamflo.com*. Stream-Flo does not tolerate any form of retaliation or unprofessional conduct towards an employee or worker who reports a compliance concern or violation.

### Forced labour and child labour risks and our remediation measures

Stream-Flo's greatest risk exposure to forced labour and child labour is through our suppliers. We recognize that the risk increases when the goods or the countries from which those goods are procured are at a high risk for human rights violations. We have processes in place to manage these risks during our onboarding and supplier management processes, as outlined above.

After conducting a risk review of our supply chain activities, which included identifying our key suppliers and the geographical regions and industries in which they operate, we did not identify any evidence of forced labour or child labour in our last fiscal year and therefore, did not implement any remediation measures.



### Employee training

Stream-Flo uses a digital action training system (DATS) to deliver training to its employees. Stream-Flo has developed training on its policies and processes related to forced labour and child labour, which is administered to all employees using DATS. The training materials include Stream-Flo's Social Policy and Supplier Code, which must be reviewed by each employee before completing a corresponding quiz. The training materials are intended to educate employees on the expectations Stream-Flo has of its suppliers and employees, including our strict prohibition of forced labour and child labour. Our employees are prompted to complete their training as it becomes due and are sent automatic reminders for overdue training. A failure to complete the training or achieve the training competency will result in escalation to the employee's manager. The training is tracked and must be completed annually.

### Our effectiveness

Identifying and eliminating forced labour and child labour in the global supply chain is a complex issue that can only be resolved through partnership and cooperation across various sectors. Further collaboration and dialogue with supply chain partners regarding child labour and forced labour is a necessary step toward the development of a collective solution.

Stream-Flo has introduced a Supplier Code and contractual language in our supplier terms and conditions related to modern slavery. We have also expanded upon our existing policies, procedures, and processes in an effort to identify and address the risk of child labour and forced labour.

We are committed to continuously evaluating the risk of forced labour and child labour within our organization and supply chain. We are also committed to building upon our due diligence processes and controls to prevent, identify and address the risk of forced labour and child labour in our activities and supply chain.

## Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act), and in particular section 11 thereof, I, in the capacity of Chief Executive Officer, attest that I have reviewed the information contained in this report on behalf of the governing body of Stream-Flo Industries Ltd. 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 within this report.

I have the authority to bind Stream-Flo Industries Ltd.

KILL Cont

Mark McNeill CEO

May 15, 2025



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