

# **2024 Report on “Fighting Against Forced Labour and Child Labour in Supply Chains Act”**

**Prepared for:**

**Public Safety Canada, Government of Canada**

**Prepared by:**

**Sanjel Energy Services Inc.**

**Reporting Period Jan 1, 2024, to Dec 31, 2024**

**May 31, 2025**

**Second Report**

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## A. ABOUT THIS REPORT

Sanjel Energy Services Inc. ("**Sanjel**", "**we**", "**our**" or the "**Corporation**") has prepared this report (the "**Report**") being submitted pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"), for the financial year ended December 31, 2024 (the "**Reporting Period**"). The Act came into force on January 1, 2024, and imposes yearly disclosure requirements on prescribed reporting entities ("**Reporting Entity**").

As a Reporting Entity, we have prepared this Report that describes the efforts being taken to enhance the transparency in our supply chains by outlining the steps taken during the Reporting Period to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

Sanjel does not report under similar legislation in any other jurisdiction.

## B. INTRODUCTION

Sanjel recognizes that the energy industry plays an important role in preventing and assessing the risk of forced labour and child labour in Canada's supply chains. Accordingly, at Sanjel we are committed to maintaining a workplace and culture of respect, dignity, and safety and expect our suppliers and contractors to comply with Sanjel's prohibition on the use of all forms of forced labour, child labour, all modern forms of slavery, and any form of human trafficking.

## C. SANJEL'S BUSINESS STRUCTURE, ACTIVITIES & SUPPLY CHAIN

### Structure

Sanjel is a privately owned corporation, headquartered in Alberta, Canada. We operate in the mining, quarrying and energy extraction sector in accordance with the sector classification from the Canadian Government.

Our locations of operations are all in Canada within the provinces of British Columbia, Alberta, Saskatchewan, and Manitoba. For more information, please refer to [Locations & Contact - Sanjel Energy Services](#).

### Activities

Sanjel is a service company, providing primary and remedial cementing solutions to energy producers and industrial customers within Canada. Our cementing services and products are blended, warehoused, and handled in Canada by employees in accordance with the provincial employee and safety standards legislation for the provinces of British Columbia, Alberta, Saskatchewan, and Manitoba.

### Supply Chains

Sanjel maintains a centralized supply chain group that procures from both Canadian and international suppliers, covering all stages from raw material sourcing to final blended product distribution. Sanjel

prioritizes partnerships with suppliers who align with our core values. This assists us in upholding our commitment to environmental stewardship, community engagement, and ethical business practices.

We procure goods and services from a range of third parties including but not limited to cementing products and additives, information technology, telecommunications, parts, transportation, storage, mail and courier services, research and analytics, marketing and promotional goods, consulting services, safety and protective gear, and office supplies.

## **D. POLICIES & DUE DILIGENCE PROCESSES**

### **Governance**

Sanjel's Board is accountable for our strategic objectives, including sustainability matters, as well as overseeing the effectiveness of the Sanjel's risks and internal controls. There are processes to keep the Board informed of the interrelationship between the business environment and its associated risks. These reporting processes are intended to facilitate and stimulate discussion of our key business risks and progress in addressing and monitoring those risks.

Sanjel has an active Modern Slavery Act Committee (the "**Committee**") that consists of varied representation, to develop a multi-year program to raise awareness and steps to prevent and reduce the risk of forced and child labour in our operations and supply chains. Part of the Committee's mandate is to keep the Board and Executives informed of the status, findings, potential risks, and any legislative developments.

### **Policies**

In accordance with our Corporate Ethics and Social Responsibility Standard policy and our Ethics Reporting Policy, employees are encouraged to report any compliance issues or suspected violations to our Privacy Officer and act in accordance with all governmental laws, rules and regulations applicable to our business. More specific to forced and child labour; our Human Rights Policy is in effect for all employees and contractors of the company and includes ethical business conduct, fair employment practices, working conditions, modern slavery, and forced and child labour.

### **Due Diligence**

For the reporting period in 2024, Sanjel does not have a specific formal document of a due diligence process solely in relation to forced labour and child labour. We do, however, take the following steps towards due diligence in our supply chains:

- Conducted a supply chain mapping activity to identify the country of origin for our material products.
- Yearly acknowledgement of our human rights policy by all employees
- Yearly acknowledgement by all employees of Sanjel's ethics policy
- Issued self-assessment questionnaires to top suppliers in regard to forced and child labour
- Issued public statement on Sanjel's stance on modern slavery [Governance - Sanjel Energy Services](#)

- Active confidential and anonymous ethics hotline for employees, suppliers or the public to speak up and raise concerns [Ethics Hotline - Sanjel Energy Services](#)
- Supplier onboarding to include forced and child labour questionnaire

Sanjel's supply chain team manages our commercial relationships with all suppliers that are issued contracts through supply chain in accordance with Sanjel's practices and procedures. The practices and processes applied by the Corporation's supply chain team serve to develop relationships with suppliers who share in our commitment to doing business in line with our core values, safety, service, excellence, integrity, and teamwork. Sanjel prioritizes partnerships and onboarding with suppliers who align with our core values and maintain an in good standing certificate of insurance, with coverages applicable to the material/services being provided to Sanjel, along with an appropriate remittance address, Workers' compensation, yearly surveys, and GST number.

## **E. POTENTIAL RISKS OF FORCED LABOUR AND CHILD LABOUR IN OUR SUPPLY CHAINS AND OPERATIONS**

In 2024, Sanjel took the following steps to prevent and reduce the risk of child and forced labour being present in its supply chains:

- Conducted a supply chain mapping activity to identify the country of origin for our material products.
- Maintained our quarterly Modern Slavery Act Committee to continue sharing findings, potential risks, and any legislative developments.
- Issued self-assessment questionnaires to top suppliers regarding forced and child labour
- Issued public statement on Sanjel's stance on modern slavery [Governance - Sanjel Energy Services](#)
- Released a confidential and anonymous ethics hotline for employees, suppliers or the public to speak up and raise concerns [Ethics Hotline - Sanjel Energy Services](#)

### **Operations**

Sanjel views its risk of forced and child labour in its operations to be low as our operations and employees are only in Canada. Out of 160 countries, Canada is ranked 17th lowest in terms of prevalence of modern slavery by the Global Slavery Index produced by Walk Free, an international human rights group focused on the eradication of modern slavery.

In addition to a low jurisdictional risk, at Sanjel we maintain employment practices consistent with Canadian labour and employment laws, which helps prevent and reduce the risk of child and forced labour in its operations. All our employees are above the legal minimum employment age in Canada and are recruited and provided working conditions and the payment of wages and benefits that comply with provincial and federal laws and regulations.

## **Supply Chains**

Sanjel is not aware of any child or forced labour in its supply chains. However, we recognize that child and forced labour can occur in every industry, sector, and geographic location. At present, Sanjel has started the process of identifying potential risks in its supply chains and operations. However, these steps have not yet been finalized.

Achieving complete visibility across all vendor supply chains is challenging and we understand that as part of a global supply chain, there may be risks that have not yet been identified. As our compliance program related to child and forced labour matures, we intend to consider further mitigation measures, as required. We also intend to continue to engage with our stakeholders and our vendors to prevent and reduce the risk of child and forced labour within our business or supply chains.

## **F. REMEDIATION**

We have not identified or been made aware of any instances of child or forced labour in its supply chains or operations. Accordingly, we did not take any remediation steps, including those related to the loss of income by the most vulnerable families as a result of remediation efforts. In addition, Sanjel reviews concerns and questions that are raised on our ethics hotline platform. To date no significant or applicable complaints or concerns have been identified.

## **G. TRAINING**

We strive to have our people trained on our business standards and culture. In particular, our people receive training and require yearly acknowledgment on a variety of human rights related topics, including our Human Rights policy, Respectful and Inclusive Workplace, Corporate Ethics and Social Responsibility policies where they are reminded and encouraged to identify potential violations in these areas, and to report behavior that does not comply with internal policies and procedures and external regulations and laws.

In 2024, Sanjel provided external third-party training to their Board of Directors and to the supply chain and sustainability group related to forced and child labour. A training matrix for modern slavery was finalized that contains required personnel, training content and frequency for training with an expected delivery in 2025.

## **H. MEASURING OUR EFFECTIVENESS**

At present Sanjel does not have methods of measuring the effectiveness of its processes that help prevent and reduce the risk of child and forced labour in our operations and supply chains. However, as we continue to evaluate our compliance measures in place that are designed to prevent and reduce the risk of child and forced labour, we intend to consider, where appropriate, implementing measures to assess the effectiveness of any of our processes. Sanjel reviews concerns and questions that are raised on our ethics hotline platform. To date no significant complaints or concerns have been identified.

## **I. APPROVAL & ASSETATION**

This Report was approved by the Board of Directors for Sanjel Energy Services Inc. on May 15, 2025

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 Sanjel Energy Services Inc. 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 'Sanjel Energy Services Inc'.

Full Name: Murray Bickley

Title: President and CEO

Date: May 22, 2025