

# Canada Supply Chain Act Annual Report

This report is made in compliance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") by Aptim Management Corp. and Aptim Services Canada Corp ("APTIM entities" or "we"). It has been prepared for the calendar year ended December 31, 2023. Aptim Management Corp's directors and officers, as its the principal governing body, approved the report pursuant to section 11(5) of the Act on May 20, 2024.

## Who We Are

The APTIM entities are direct subsidiaries of Aptim Canada Acquisition LLC, and indirect subsidiaries of Aptim Corp, both Delaware companies headquartered in the United States (together, "APTIM").

Aptim Canada Acquisition, LLC is the parent company of Aptim Management Corp., which is the parent company of Aptim Services Canada Corp.

## What We Do

**Our Mission:** APTIM enhances the quality of the environment, well-being of people, resilience of communities, and opportunity for employees to make a difference, not just a living.

A leading professional solutions firm, we specialize in environmental, sustainability, resilience, and infrastructure solutions. Our team of experts provide these integrated solutions for forward-thinking government agencies, commercial and industrial clients, and energy customers. Together, we create sustainable and resilient communities for all.

**What we do in Canada:** APTIM supports the maintenance of energy industry assets throughout Canada. APTIM employs tradespersons to plan and execute maintenance work at permanent facilities owned by our clients. The work entails the demolition, replacement, and refurbishment of industrial equipment including piping, pressure vessels, pumps, compressors, valves, electrical and instrumentation systems. As part of that work, APTIM fabricates components of these systems at a fabrication facility, and then transports and installs these systems. APTIM also provides professional services such as engineering, construction, and project management to facilitate the installation and maintenance work.

## Our Supply Chains

Our supply chains for the maintenance business consist of various types of goods and services that support our operations in Canada.

We source most of these goods and services from local suppliers in Canada, primarily in Alberta, where our fabrication facility and client sites are located. We also procure some goods and services from international suppliers, mainly from the United States, Mexico, China, India, and Europe, depending on the availability, quality, and cost of the items. We strive to select suppliers who share our values and standards of ethical conduct, environmental stewardship, social responsibility, and governance.

## How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour

APTIM is committed to accelerating the transition toward a clean and efficient energy economy, building a sustainable future for our communities and natural world, and creating an inclusive equitable environment that celebrates the diversity of our people. The way APTIM behaves as a company and as a community is inseparable from the way we serve our

clients. We commit to make Environment, Social, and Governance part of our business and culture. We believe in our mission In Pursuit of Better, for our employees, our clients, and the communities that we serve.

At APTIM, ESG is not just the acronym of the day; it is deeply embedded in the principles of our culture and heavily informs the path we take as a company. We commit to work with our partners to address the global challenges we face.

APTIM Services Canada Corp. is party to collective bargaining agreements governing the employment of all union employees working for our company. We comply with Canada labour laws and take seriously our commitment to bargain fairly with the unions representing our employees. Grievance procedures are part of each collective agreement to assist in the resolution of any disputes.

Additionally, all employees and suppliers have access to raise concerns, 24/7 and anonymously, if they wish, using APTIM's Ethics Line.

APTIM requires all suppliers and subcontractors to accept and commit to our Supplier Code of Conduct, including the prohibition against forced labour and child labour. See below section on Our Due Diligence Processes for more details. This requirement extends to the APTIM entities and is part of our Code of Conduct.

## **Our Policies**

APTIM's policies, which apply to APTIM entities, reflect its commitment to respecting human rights and preventing the use of forced labour or child labour. Please see the following:

Excerpt from the Supplier Code of Conduct, AMS-310-00-PL-00008:

### **Respect Human Rights**

APTIM entities expect suppliers to conduct business in compliance with applicable laws protecting human rights, to provide reasonable working hours and conditions, and never to use forced labour or human trafficking. APTIM will not knowingly conduct business with suppliers who violate these laws.

Excerpt from our Code of Conduct, AMS-310-00-PL-00004:

At APTIM, we do amazing work. We welcome the opportunity to partner with clients who are also doing great things, supporting our government and commercial clients and the communities that we collectively serve. APTIM is strongly committed to doing the right thing, conducting its business in accordance with the highest ethical standards.

The character, reputation, and integrity of our company and our people are precious. We will never put them at risk for any reason. Not ever.

This Code of Conduct provides guidelines for APTIM employees in doing the right thing, upholding the law and the highest standards of ethics and integrity.

### **We Respect Human Rights Around the World**

APTIM conducts business in a manner respecting the rights of all people and in compliance with laws regarding human rights. We provide reasonable working hours and conditions. We have a zero-tolerance policy regarding the use of forced labour or human trafficking. People working for APTIM must do so voluntarily and for proper wages without coercion of any kind. APTIM never knowingly conducts business with subcontractors, business partners, suppliers, or other third parties who violate these laws.

APTIM does not impose unreasonable restrictions on a worker's rights to leave a facility or project or terminate employment. No employee shall pay or give anything of value to obtain a job here. APTIM will not engage in any harsh or inhumane treatment.

## Our Due Diligence Processes

APTIM uses a vendor registration system to ensure that our suppliers and subcontractors are aware of and commit to our policies prohibiting forced labour and child labour. Additionally, we vet these suppliers and subcontractors against prohibited parties lists using a third party application called E2Open; these checks are updated nightly. We require all subcontractors and suppliers to accept our supplier code of conduct, which includes a prohibition against forced labour and child labour; this commitment is required at the inception of our relationship with these suppliers or subcontractors, and the commitment is renewed annually.

## Employee Training on Forced Labour and Child Labour

APTIM, including APTIM entities, trains all employees annually on our code of conduct, including our policies prohibiting forced labour and child labour.

## How We Monitor Ourselves and Our Suppliers and Assess Effectiveness

As part of our commitment to the highest ethical standards and transparency in reporting, we joined the UN Global Compact, a public commitment to the Compact's 10 universal principles covering human rights, labour, discrimination, environmental, and anti-corruption topics.

APTIM also formed the following committees and councils, whose work are integral to monitoring our own compliance with ethical standards and ESG commitments.

### COMMITTEES AND COUNCILS

#### Ethics Board

- Provides information and ideas on compliance topics and Ethics Line trends and serves as an important communication link between compliance and functional leadership
- Comprised of business leaders from our strategic business units and support functions

#### Diversity, Equity, and Inclusion Council

- Informs leadership of industry trends; provide cross-company feedback; and proposes strategy and tactics regarding diversity, equity, and inclusion topics
- Comprised of a diverse group of employees and sponsored by our CEO

#### ESG Advisory Council

- Provides input and feedback on ESG strategy, performance, and key deliverables, and champions initiatives within their teams
- Comprised of CEO as executive sponsor, enterprise director of ESG as chair, and cross-company leaders, including members of our strategic business units

## We Are Aware of Risks of Forced Labour or Child Labour Use in Global Supply Chains

APTIM is committed to ensuring that forced labour and child labour are not used in our supply chains. We source materials from reputable suppliers who comply with labour laws and regulations. Please see above description of our registration and vetting process for suppliers and subcontractors.

## How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour our in Supply Chains

APTIM is unaware of situations of the use of forced labour or child labour in our supply chains and therefore has not had to remedy or rectify such situations.

### 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.

Bradley T. Lowe

Director and Treasurer, Aptim Management Corp.

Date: May 20, 2024

Signature: 

I have the authority to bind Aptim Management Corp .