

Modern Slavery Report (Bill S-211)

SECURE Waste Infrastructure Corp. Fiscal Year 2025

Prepared in accordance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211).

1. Reporting Entity

Legal Name

SECURE Waste Infrastructure Corp.

SECURE Waste Infrastructure Corp. has two fully owned Canadian subsidiaries: SECURE Specialty Chemicals Corp. and WiQ Technologies Inc. SECURE's operational footprint is entirely within Canada and the United States. Both Canadian subsidiaries report into a single senior leadership team (President & CEO, COO and CFO) and are internally governed by the same operating practices, corporate policies and procedures as SECURE Waste Infrastructure Corp.

On January 1, 2025, SECURE Energy Services Inc. changed its name to SECURE Waste Infrastructure Corp. to more accurately reflect its waste management activities and the infrastructure that supports its waste business. All entities formerly under SECURE Energy Services Inc. (SECURE Energy Services Inc., SECURE Energy (Drilling Services) Inc., and SECURE Energy) were incorporated into SECURE Waste Infrastructure Corp. The Corporation's common shares are traded on the Toronto Stock Exchange ("TSX") under the symbol "SES" and is a constituent of the S&P/TSX Composite Index.

In 2025 SECURE had just over 1,900 employees with 99% of its employee base located in Canada.

SECURE does not operate in other countries, like the United Kingdom or Australia, where modern slavery, forced labour or child labour reporting is a regulatory requirement.

Address

SECURE Waste Infrastructure Corp ("SECURE") is headquartered in Calgary, Alberta at 2300, 225 6 Ave SW with field operations located throughout western Canada and North Dakota.

Jurisdiction of Incorporation:

Alberta, Canada

Business Numbers:

SECURE Waste Infrastructure Corp. 857304323

SECURE Specialty Chemicals Corp. 836377861

WiQ Technologies Inc. 812798973

Fiscal Year End:

December 31, 2025

Reporting Period:

January 1, 2025 – December 31, 2025

2. Structure, Activities, and Supply Chains

Company Overview

SECURE operates a fully integrated network of waste processing facilities, produced water pipelines, industrial landfills, and waste transfer stations and provides field & industrial solutions capable of handling all major waste streams in Western Canada and North Dakota. Services include produced and wastewater disposal, hazardous and non-hazardous waste collection, processing and storage, and treatment of crude oil emulsions. The Corporation also manages ferrous and non-ferrous metals for industrial, energy, mining, residential, and commercial customers in Western Canada through our network of metals recycling facilities, rail response, and project management services. SECURE collects, processes, and recycles metals to be used in new steel manufacturing. SECURE also develops technologies that optimize operations and increase production. Through this infrastructure network, the Corporation carries out business operations including the processing, recovery, recycling and disposal of waste streams generated by its energy and industrial customers.

Operations

SECURE delivers environmental solutions, including hazardous and non-hazardous waste management, field services, recycling, and decommissioning. These services support oil & gas, mining, manufacturing and other industrial activities, along with agricultural and municipal clients.

SECURE requires all employees and contract employees to be over the age of 18 and to be legally eligible to work in Canada or the United States. Both criteria are verified at the time of hire. SECURE's procedures, practices and policies are compliant with Canadian or U.S. labour law requirements. Employees are covered under overtime agreements and overtime is voluntary. Additional details about SECURE can be found on SECURE's website:

[About Us | SECURE Delivering Change Together](#)

Supply Chains

SECURE's supply chain consists of:

Domestic procurement including: equipment, chemicals, supplies (example Personal Protective Equipment) and vehicles.

International sourcing of supplies and materials is primarily chemicals and materials for the construction of internal infrastructure like piping and tanks, landfill liners, and other materials for process vessel components.

The use of domestic contracted service providers for transportation, site operations, and specialized remediation. The use of contractors is driven by a lack of capacity within SECURE's own operations or the need for specialized technical services or expertise that does not exist within SECURE's operations. Many of these contractors are considered safety sensitive and if they are deemed safety sensitive are required to go through additional screening annually using a contracted third-party screening service.

3. Policies and Due Diligence

Policies Addressing Forced Labour and Child Labour

SECURE is governed by the following policies that address forced labour, child labour, and modern slavery and the fair and ethical treatment of people:

- Business Code of Conduct,
- Supplier Code of Conduct,
- Human Rights Policy; and
- Indigenous Relations Policy.

The following links provide access to these policies:

[Sustainability Reports and Policies | Transparent Reporting and Sustainable Solutions | SECURE](#)

[Supplier Code of Conduct - January 2026-1.pdf](#)

Due Diligence Processes

In 2023, SECURE began incorporating supplier screening into its supply chain to reinforce its commitment to ethical and sustainable practices. As part of supplier onboarding, suppliers are required to acknowledge SECURE's Supplier Code of Conduct and select suppliers are required to complete an online supplier screening survey. The supplier screening survey includes screening for indicators of child labor, forced labor and modern slavery.

SECURE uses the following process for assessing its supply chain:

1. Identification and categorization of suppliers that are considered high-risk based on the countries they operate in and/or the products they supply, where high-risk countries are determined using an objective standard- the Global Slavery Index.¹ Any suppliers that fall into this category are automatically selected for additional screening and if deemed necessary, through screening, an audit and/or site visit.
2. Conducting a risk-based screening program for all suppliers that are not identified as high-risk. Suppliers are categorized into groups, where suppliers that meet a minimum

¹ Global Slavery Index provided by Walk Free. [Global Slavery Index | Walk Free](#)

- spending threshold and/or are used frequently are deemed higher risk and are prioritized into screening over other suppliers.
3. Screening consists of completion of an online Supplier Screening Questionnaire.
 4. Anything detected during online screening triggers additional follow-up which may include requests for additional information, a phone interview, and if deemed necessary, an audit and/or site visit.
 5. Suppliers that are screened and audited will continue to be monitored.

4. Risk Assessment and Management

Identified Risks

In 2025 SECURE conducted its annual supply chain review and confirmed that no new suppliers from at-risk countries were added to SECURE's supply chain. At-risk suppliers identified in previous years remained in SECURE's supply chain except for one. The supplier from Mexico was dropped in 2025 because of tariff issues and all materials previously sourced from the Mexican supplier were switched to the Argentinean one. Table 1 provides a summary of the at-risk suppliers and has been updated to reflect the change noted.

During preparation of the 2025 Report, SECURE identified that two at-risk suppliers, operating in Bahrain and Malaysia, were not included in the 2024 Report. Following internal review, it was determined that these suppliers had initially been excluded based on the application of internal supplier spend thresholds. The suppliers represented comparatively low spend relative to other suppliers operating in jurisdictions assessed as at-risk for modern slavery. SECURE personnel conducted site visits at both supplier locations during 2024, and no indicators or concerns related to modern slavery were identified during those visits. Table 1 has been updated in the 2025 Report to include these suppliers and reflect the expanded scope of SECURE's supplier inventory and risk assessment processes.

Table 1. Suppliers Identified with High-Risk Potential Based on Geography using the Global Slavery Index (2023).

Year Identified	High-Risk Country (Global Slavery Score) Note: Higher score indicates higher risk potential	Supplier Details
2023	China (4)	3 suppliers - specialty chemicals
2023	Argentina (4.2)	1 supplier - piping and base components for process equipment and infrastructure
2024	United Arab Emirates (13.4)	1 supplier - specialty chemicals
2024	Mexico (6.6)	1 supplier - piping and base components for process equipment and infrastructure
2024	Colombia (7.8)	1 supplier - piping and base components for process equipment and infrastructure
2024	Malaysia (6.3)	1 supplier – specialty chemicals
2024	Bahrain (6.7)	1 supplier – specialty chemicals
2025	<i>Note that the Mexican supplier (identified in 2024) was changed to the Argentinian supplier in 2025 because of tariff issues.</i>	

In 2023, four suppliers were identified with a high potential for using forced or child labour based on geography. Audits and sites visits were completed for two of the Chinese suppliers in 2023. The audit and site visit for the third supplier was scheduled but could not be completed due to inclement weather and difficulty travelling safely to the supplier's location. A site visit for

the remaining Chinese supplier will be scheduled in the future. The suppliers in Mexico, Columbia and Argentina were identified as high-risk based on geography. Further assessment of these suppliers will be completed in the future, if SECURE continues to use these suppliers.

Actions to Address Risks

The following actions are in place to mitigate risks associated with forced labour, child labour and modern slavery:

- Continued phase in of supplier screening program for low-risk suppliers.
- Ongoing monitoring of suppliers that have been screened.
- Reinforcing the use of SECURE's whistleblower process to provide a mechanism for reporting noncompliance of SECURE's Code of Conduct and Human Rights violations.

5. Remediation Measures

Incidents and Responses

SECURE's assessments in 2024 and 2025 did not detect any incidents of forced labour, child labour or modern slavery, so no remedial action plans were required.

Should an incident occur, SECURE would either:

- Terminate the affected supplier immediately; or
- Work with the affected supplier to develop and implement a remedial action plan.

The remedial action plan may include measures to support impacted individuals that lose income through the elimination of a supplier contract through remediation funds or services. Until the plan is fully implemented, progress on achieving remedial plan milestones will be reported to SECURE; failure to achieve milestones in a reasonable timeframe may result in termination of the supplier.

SECURE will consider engaging local authorities and NGOs if required.

6. Training and Capacity Building

Internal Training

Awareness training was delivered to:

- Personnel with supply chain or procurement responsibilities,
- Operational and engineering leaders with the potential to purchase items in high-risk countries or products; and
- Senior leadership (C-Suite, Vice Presidents, Directors and SECURE's Board of Directors).

These roles comprise about 10% of all employees. The 2025 completion rate for awareness training was 85%. This awareness training is also made available to any employee who would like to learn more about modern slavery.

Supplier Engagement

Since 2024, screening has been completed for 392 suppliers assessed as low-risk, and 100% of suppliers identified as high-risk have undergone screening. Screening activities for low-risk suppliers were paused in 2025 to allow SECURE to further refine and formalize its internal supplier screening thresholds, methodology, and governance processes.

7. Assessing Effectiveness

Continuous Improvement

To drive continuous improvement, the following opportunities have been identified:

- Review internal screening thresholds, methodology and governance processes for low-risk suppliers to more effectively balance SECURE's internal resources and the risks posed by low-risk suppliers; and
- Conducting audits and/or site visits for high-risk suppliers identified through screening that have not already been audited.

8. 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 of 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.

I have the authority to bind SECURE Waste Infrastructure Corp.



Corey Higham
Chief Executive Officer
May 30, 2026