

# Modern Slavery Report (Bill S-211)

## SECURE Waste Infrastructure Corp.

### Fiscal Year 2024

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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. SECURE Energy 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 2024 SECURE had over 1,800 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 required.

**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, 2024

**Reporting Period:**

January 1, 2024 – December 31, 2024

## 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:

[SECURE | Transforming Waste Into Value](#)

### 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. Most 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 link provides access to these policies:

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

#### **Due Diligence Processes**

In 2023, SECURE began incorporating supplier screening into its supplier 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.<sup>1</sup> 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 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.

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<sup>1</sup> Global Slavery Index provided by Walk Free. [Global Slavery Index](#) | [Walk Free](#)

- 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

As part of its 2024 supply chain review, SECURE identified the importation of base chemicals and the purchase of construction materials for its facilities and infrastructure, as areas of elevated risk. In the same year, one of SECURE’s long-term suppliers of personal protective equipment (coveralls) advised that, due to increased customer demand, a portion of its product supply would be purchased overseas to supplement domestic production. Table 1 provides additional details on the risks identified through the review.

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

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	Columbia (7.8)	1 supplier - piping and base components for process equipment and infrastructure

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.

In 2024, a supplier in the United Arab Emirates used in the Specialty Chemical business was identified as high-risk based on geography. A site visit of this vendor was completed and no signs of modern slavery were apparent during the site visit.

The material suppliers in Mexico, Columbia and Argentina were identified as high-risk based on geography. Further assessment for these suppliers will be completed in 2025.

### **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 until all suppliers complete screening and ongoing monitoring of suppliers have completed screening,
- 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:

1. Terminate the affected supplier immediately; or
2. 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 2024 completion rate for awareness training was 83%. 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 low risk suppliers and 100% of high-risk suppliers have been screened.

## 7. Assessing Effectiveness

### Continuous Improvement

To continue to advance, the following opportunities for improvement have been identified:

- Continued expansion of supplier screening assessments; and
- Conducting audits and/or site visits for high-risk suppliers identified through screening that have not 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.



Rhonda Rudnitski  
Vice President ESG  
May 30, 2025