



***FIGHTING AGAINST FORCED
LABOUR AND CHILD LABOUR
IN SUPPLY CHAINS ACT***

2024 ANNUAL REPORT





INTRODUCTION

At PTW, we deeply value the drive and dedication of our people. Our culture is the cornerstone of our company, reflecting our commitment to the communities we serve.

It defines the way we operate and interact, not only with our clients, but also within our team and the broader society. We believe in creating an environment that inspires, nurtures and uplifts, driven by our unwavering commitment to safety, excellence, and continuous improvement. This ethos fuels our ambition, shapes our decisions, and guides our actions. It is the essence of our culture, which we are proud to share.

Everyone deserves to be treated with dignity and fairness and our core values embrace these rights for people to live their lives free from social, political, or economic discrimination or abuse. We aim to nurture relationships, act with integrity and empathy, communicate transparently, empower, hold ourselves accountable and protect each other and our communities.

We are committed to creating a diverse, equitable and inclusive workplace and respecting everyone's human rights. Equity means ensuring that everyone has fair and equal access to opportunities and resources, regardless of their background or identity. Inclusion means creating a sense of belonging for all individuals by valuing and respecting their perspectives and experiences. This together with our commitment to acting ethically and responsibly in all business relationships reflects our fundamental beliefs that we inject into our day-to-day business and guides our operations.

To preserve the trust our stakeholders have in us, we rely on our network of suppliers including vendors, manufacturers, agents and others to commit to and uphold our high standards of integrity, values and operating principles.

This report outlines our initiatives, both current and future, to identify, prevent, mitigate and communicate Forced Labour and Child Labour risks in our supply chain.

REPORTING ENTITIES:

Under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the following entities meet the reporting requirements:

- PTW Energy Services Ltd.
- PTW Canada Ltd.
- PTW Structural Solutions Ltd.

Each of the above entities claiming entity report status by having at least \$20 million in assets and generating at least \$40 million in revenue.

PTW Energy Services Ltd. ("PTWESL") does not perform any specific work or services but as the sole shareholder of PTW Canada Ltd. ("PTWCL") and PTW Structural Solutions Ltd. ("PTWSSL"), it falls into the category of an entity required to report as defined in the Act.

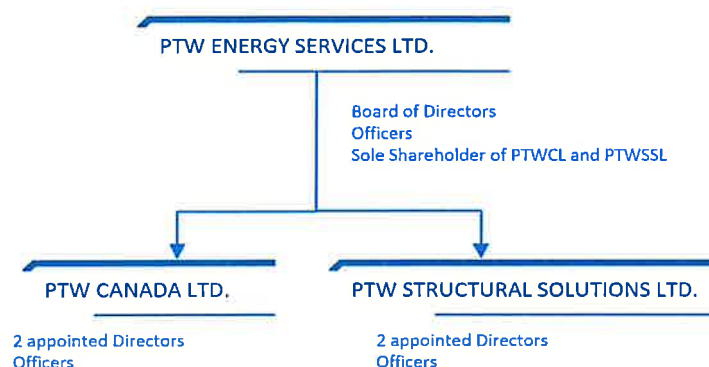
PTW Canada Ltd. and PTW Structural Solutions Ltd. are contracting entities and each of them meet the requirements of an entity required to report.



For the purposes of this report, except where it is applicable to reference each of the entities individually, these entities will collectively be referred to as “PTW”.

STRUCTURE

All three PTW entities are active operating entities and incorporated under the laws of the Province of Alberta. Organizationally, each entity follows a chain of command and departmental management.



Headquartered at 285188 Frontier Road, Rocky View County, AB, T1X 0V9, we are one of the largest providers of electrical and instrumentation (E&I) maintenance and construction services in western Canada. We are also a Canadian leader in customized self frame, rigid frame, structural steel and pre-engineered building solutions.

PTW is a fully integrated electrical and instrumentation solutions and construction services provider. In 2024 we had an average number of 1,841 employees and 40 branch locations across Canada. This extensive network allows us to execute projects with a consistent approach while providing clients with localized expertise and support. Our Branch network is supported by our construction workforce, giving us the competitive advantage to take on projects of all sizes and client requirements.

Our corporate operations include health, safety, environment, quality, supply chain, sustainable development, information technology, human resources, finance, legal and Indigenous relations.

PTW also has a robust business continuity plan designed to ensure the flow of operations and minimize disruptions to stakeholders in the event of unforeseen circumstances. PTW prioritizes organizational safety, employee wellbeing, financial and personal goals together with aiming to promote well-rounded leadership and encouraging the success of the company.

CONTROL

For the purpose of the Act, Pacific Northwest Electric & Controls Ltd. and Pembina Controls Inc. are subsidiaries of PTW Energy Services Ltd. and fall under the term of control as set out in subsection 10(2) of the Act.



ACTIVITIES

PTW operates in, but is not limited to, the following industries:

- | | |
|---------------------------|--------------------|
| ▪ Agriculture | ▪ Pipeline |
| ▪ Forestry Pulp and Paper | ▪ Oil & Gas |
| ▪ Government | ▪ Petrochemicals |
| ▪ Manufacturing | ▪ Power Generation |
| ▪ Metals and Mining | ▪ Renewable Energy |

PTWCL performs electrical instrumentation and maintenance and construction services and PTWSSL performs fabrication work which fall under the following categories:

- ✓ Producing goods (includes manufacturing, extracting growing and processing), in Canada
- ✓ Importing into Canada goods produced outside Canada
- ✓ Controlling an entity engaged in producing goods, in Canada
- ✓ Controlling an entity engaged in importing into Canada

We are committed to the utilization of best management practices and by leveraging the education, commitment, and dedication of our team members. We adhere to all regulatory requirements and fulfill the environmental protection commitments.

PTW's Quality Commitment

To ensure that our stakeholders receive high-quality products and services, we have developed and implemented a robust Quality Management System (QMS) in our QHSE department. The QMS is based on the widely recognized and respected ISO 9001 framework, which provides a solid foundation for PTW to continuously document and improve our practices to meet the ever-changing needs and expectations of our clients. We have also integrated a risk-based philosophy into our QMS to identify potential issues and proactively address them in relation to our Health and Safety programs.

Through this approach, PTW is able to control the interrelationship among the QMS processes, which has enabled us to enhance the overall safety of our company.

MEMBER ORGANIZATIONS

The following are some of the organizations that PTW either pairs with or is a member of to ensure that it meets industry and customer standards:



Collect. Verify. Connect.







PTW celebrates the rich diversity of race, ethnicity, gender, age, sexual orientation, religion, abilities, and other factors that make us unique. We cherish our long-standing partnerships with organizations and groups that support our diversity and inclusion goals, including but not limited to CAREERS, Lokken College, trade Schools across Canada, Women Building Futures, and other local partners across Western Canada.



SUPPLY CHAIN

PTW is committed to upholding the highest standards of ethical conduct and social responsibility within our operations and supply chains. We firmly oppose and condemn the use of forced labour and child labour in any form, and we support measures to ensure compliance with the legislation for Forced Labour and Child Labour.

PTW supports all initiatives to provide comprehensive training to employees involved in procurement, sourcing and supply chain management to raise awareness of the issues related to Forced Labour and Child Labour. This education should empower our employees to identify, report and address any concerns promptly.

In 2024, we did not become operational with our training program as we anticipated. However, in 2025 we initiated the education of our employees during monthly meetings that included information on the topic of Forced and Child Labour. This was done in preparation for the rollout of a comprehensive training program later in 2025.

STEPS USED TO REDUCE FORCED LABOUR/CHILD LABOUR (SUBSECTION 11(1))

PTW is firmly committed to ethical practices and social responsibility. We advocate and require our suppliers to adhere to our Supplier Code of Conduct policy which explicitly prohibits the use of forced labour, child labour, or any form of human trafficking in our supply chains.

We seek to engage in partnerships with suppliers, manufacturers and organizations that conduct due diligence assessments to evaluate their practices and ensure they align with our ethical standards. Our proactive approach ensures that our sourcing practices are ethical but also sustainable, and environmentally friendly.

POLICY & DUE DILIGENCE

PTW operates under comprehensive umbrella policy agreements that govern all PTW entities in their responsibilities to their employees and customers, ensuring the associated due diligence required to enforce such policies.

We ensure that all policies and procedures are aligned with Federal and Provincial, Employment Standards legislation, Human Rights legislation and Occupational Health & Safety legislation. This commitment is reflected in several key documents used by PTW, which address these critical topics:

- Code of Conduct, Whistleblower and Anti-Retaliation Policy
- Anti-Harassment Policy
- Anti-Violence Policy
- Purchase Order Terms and Conditions (vendor/supplier)
- Supplier Code of Conduct
- Standard form of Subcontract Terms and Conditions

Our Human Resources department rigorously reviews all new hire onboarding paperwork to ensure compliance with applicable legislation. Payroll serves as the final check to guarantee adherence to these standards.



Additionally, our purchase order terms and conditions and standard form of Subcontract Terms and Conditions require contractors, suppliers, and service providers to adhere to all applicable laws including, those related to human rights and to conduct their business in compliance with PTW's Supplier Code of Conduct.

RISK

Suppliers are required to meet PTW's expectations in accordance with company policies and its Supplier Code of Conduct in order to become an "approved" supplier. We further strive to ensure our contracts and agreements with suppliers outline expectations with respect to granting us authority to conduct audits to ensure that services or products are provided or performed in accordance with our standards.

PTW had approximately 5,560 active Vendors, Suppliers and subcontractors during 2024 however, as yet, we are unable to report regarding parts of the supply chain that may carry risk of Forced Labour or Child Labour as no risk analysis was performed. However, no incidents, complaints or grievances within our supply chain were reported to PTW.

REMEDIATION and REMEDIATION ON LOSS OF INCOME

PTW's suppliers are expected to comply with the standards outlined in its Supplier Code of Conduct and any violation may lead to termination of any agreement the Supplier may have with PTW.

In 2024, PTW did not perform any formal monitoring of its supply chain to identify any potential or actual incidents connected to Forced Labour or Child Labour. However, PTW did not receive any complaints or grievances relating to Forced Labour or Child Labour, nor did it note any measures taken with respect to a Supplier related to a breach of its Supplier Code of Conduct or specifically in connection with Forced Labour and Child Labour that resulted in a either requirement to remediate a risk or remediate any loss of income to vulnerable families affected by remediation of a risk.

TRAINING

PTW requires all employees to read the and sign an acknowledgment that they have read the Code of Conduct, Whistleblower and Anti-Retaliation policy to ensure that applicable legislation is followed. In 2024 PTW did not perform any specific employee training with respect to Forced Labour or Child Labour, but a training program will begin in 2025.

ASSESSING EFFECTIVENESS

Although PTW did not conduct assessments in 2024 to ensure that Forced Labour and Child Labour are not being used in our business or supply chain, we acknowledge our responsibility to continuously evaluate the effectiveness of our policies, contracts, agreements and overall measures. We are committed to improving our processes for identifying, mitigating and remediating Forced Labour and Child Labour risks in our operations.



In 2025, we:

- Initiated an awareness campaign with monthly information bites presented to all employees to build awareness of forced and child labour. This campaign aims to educate our workforce on the importance of addressing these critical issues.
- Are investigating 3rd party options to provide employee training programs on child and forced labour for all employees. This program will cover the scale and scope of child and forced labour, how it affects our business and operating environments, and our responsibilities in addressing it.
- Researching gap risk analysis options to be conducted to identify areas of improvement with respect to training and due diligence processes in connection with our supply chain. This analysis will help us pinpoint weaknesses and develop strategies to address them.

IN ACCORDANCE WITH THE REQUIREMENTS OF THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT, AND IN PARTICULAR SECTION 11 THEREOF, I, IN THE CAPACITY OF CHAIRMAN, ATTEST THAT I HAVE REVIEWED THE INFORMATION CONTAINED IN THE REPORT ON BEHALF OF THE GOVERNING BODY OF THE 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 2024 REPORTING YEAR.

(signature)

As a member of the Board of Directors of PTW Energy Services Ltd., I have been given the authority to sign on behalf of all of them in this matter

Name: Don Basnett

Title: Chairman

Date: May 23, 2025

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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 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 2024 REPORTING YEAR.

PTW ENERGY SERVICES LTD.

(signature)

I have the authority to bind PTW Energy Services Ltd., PTW Canada Ltd. and PTW Structural Solutions Ltd.

Name: John Cooper

Title Chief Executive Officer

Date: May 23, 2025

