



## Apex on Human Rights Canadian Modern Slavery Reporting

May 21, 2025

*This report is prepared in accordance with the United Kingdom’s Modern Slavery Act 2015, the Australian Modern Slavery Act 2019, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act), which came into force on January 1, 2024 (“the Canadian Act”).*

*This report sets out the steps taken by Apex Oilfield Services (2000) Inc. “Apex” to ensure compliance within the Canadian Act and outlines the measures taken to prevent modern slavery including forced labour and child labour, and human trafficking in Apex’s business operations and supply chains. Additionally, it outlines the internal beliefs and core values inherent to Apex.*

*This report was prepared in collaboration with Apex Senior Management and Ownership.*



### **1. Who We Are**

*Apex is a leading supplier of drilling equipment rentals and service in the Western Canadian Sedimentary Basin. A private company with humble beginnings, Apex has quietly grown to be the supplier and employer of choice in the energy services industry.*

*With approximately 150 employees and dedicated services centers throughout Western Canada, Apex values its people and is committed to adhering to all industry, provincial, and federal regulations.*

## **2. Our Commitment to Human Rights**

*The protection of human rights is foundational to Apex's core values and evident in how it conducts its business and treats its employees. Apex is an equal opportunity employer and does not tolerate modern slavery, including forced labour and child labour, or human trafficking in either our business, supply chains, or business partnerships.*

## **3. Our Structure, Operations, and Supply Chains**

**3.1** *Apex is a privately held company headquartered in Red Deer, Alberta, Canada with a sales office in Calgary, Alberta.*

**3.2** *Apex has Operation centers in Estevan and Gull Lake, Saskatchewan. Red Deer, Whitecourt, Lloydminster, Lac La Biche, and Grande Prairie, Alberta, as well as Fort St. John, B.C.*

**3.3** *Apex primarily builds its own equipment and mainly sources parts from local suppliers. A single foreign supplier for solids control equipment is used to procure centrifuges integral to the drilling process.*

## **4. Modern Slavery and Human Trafficking Risks**

*The risk of Apex contributing to human trafficking and modern slavery is extremely low. Despite this, Apex is committed to providing a safe, respectful, and fair workplace free of harassment and the protection of human rights.*

*Apex has established comprehensive Human Resources policies, in addition to a Modern Slavery Safe Work Practice (SWP), Ethics and Integrity Policy, and Modern Slavery and Human Trafficking Training for all employees.*

*All policies and procedures are communicated to employees upon hire. Compliance and acknowledgment of these policies, procedures, and training requirements are tracked and monitored through a dedicated HSE and HRIS compliance software system. Further, all employees are required to complete Modern Slavery Awareness – an internal training every three years.*

## **5. How Apex Identifies and Addresses Modern Slavery Risks**

*A respectful and inclusive corporate culture is a fundamental part of our foundation. Our Code of Conduct and Ethics sets clear expectations for all employees, suppliers, and business partners to uphold Apex's commitment to global corporate responsibility, with particular emphasis on preventing modern slavery and human trafficking.*

*To date, Apex has not identified any instances of forced or child labor within its operations or supply chains. As such, no remediation measures have been necessary. However, Apex remains vigilant and continues to evaluate potential risks, especially in response to any changes within the supply chain. The company has not—and will not—knowingly engage with any supplier found to be in violation of basic human rights.*

*In situations where complete risk elimination is not feasible, Apex will implement appropriate controls to mitigate the risk of forced and child labor. Where applicable, these measures will align with International Labour Organization (ILO) and International Responsible Business Conduct (IRBC) guidelines, as well as other widely recognized best practices, across both internal operations and external suppliers. Monitoring systems may also be employed to ensure compliance with government-mandated reporting obligations. These actions may include, but are not limited to:*

<b>ABUSE AND VULNERABILITY: Control Measures</b>	<b>Monitoring Mechanism</b>
Ensuring ethical recruitment and hiring processes related to human rights.	Maintaining internal policies and procedures to help ensure that all employees are recruited voluntarily and are legally qualified and of legal age to work within their jurisdiction.
Ensure workers are aware of their rights during recruitment and employment. Ensure that discrimination throughout all operational processes is completely absent and prohibited, with workers and managers trained in non-discriminatory practices. Ensure workers know where to seek help if they feel their rights have been violated during both the recruitment process and their employment tenure.	With consideration to confidentiality, record the amount of known number of incidents of reports of abuse, and/or legal assistance provided to workers within the organization related to abuse and vulnerability associated with work tasks.
Establish and maintain accessible grievance mechanisms for employees throughout both recruitment and employment. Promote open dialogue among employees regarding any concerns they may have related to managerial actions or decisions.	
Provide training and life skill courses to workers on workplace health and safety, anti-bribery and corruption, and anti-harassment and anti-violence.	Monitor the whistleblower hotline for any complaints or concerns related to human rights issues. Provide workers with appropriate resources to ensure they feel safe and supported when raising workplace grievances or reporting them to the relevant authority.
	Record the participation in the courses provided to employees regarding life skills.

**DECEPTION AND DEBT BONDAGE: Control Measures**

Ensuring compliance with ethical recruitment policies and hiring procedures that adhere to the applicable national law.

Increase managerial involvement, or recruitment partner involvement, from ethically known companies, within the recruitment process, who are trained in, and enact non-deceptive practices including all prohibited grounds of discrimination.

Ensure all parties involved in the recruitment process can be known upon request. E.g. Recruitment agencies, company adverts, etc. Furthermore, investigate recruitment partners considering those who undertake countermeasure against forced labour practices.

**Monitoring Mechanism**

Currently in place. Record the incidence of any reported breaches of human rights or employment law that are made by workers or employment candidates, and the incidence of use of recruitment companies who have known unethical practices.

To further track and monitor the impact of human rights and performance of employees and subcontractors.

Apex evoked a process as outlined by section 2.0 of SWP.

**RESTRICTION OF MOVEMENT: Control Measures**

Continually review organizational practices that may inhibit workers' freedom of movement, or excessive recording of workplace undertakings, and take action to remove these restrictions and actions. If restriction or record of movement has been established as a safety hazard, find a more suitable alternative.

**Monitoring Mechanism**

Record the incidence of actions or dialogue between workers and supervisors relating to removing restrictions to freedom of movement.

Ensuring compliance with OH&S by all employees through onboarding, education and courses.

**ISOLATION: Control Measures**

Establish grievance mechanisms for individuals who may experience isolation. Engage with senior managers and stakeholders to facilitate enhanced communication with individuals isolated including undertakings such as the provision of cell phones or other means of communication.

**Monitoring Mechanism**

Record the use of known grievance mechanisms regarding isolation and instances, where means of communication are provided, where they were otherwise absent.

**PHYSICAL AND SEXUAL VIOLENCE: Control Measures**

Ensure employees and managers are familiar with established policies and procedures for reporting and managing violence and harassment. Ensuring grievance mechanisms are available for individuals who may experience physical and sexual violence.

**Monitoring Mechanism**

Record data concerning the incidence of reported harassment or violence. Utilizing technology and committees to alleviate risk and ensure safe and confidential reporting of any instance or concerns of gender, physical, or sexual violence.

Ensure trained personnel to investigate complains of harassment, receive complaints and enforce appropriate remedies aimed at reducing harassment in accordance with law and company policy.

Provide awareness training regarding violence and harassment to all workers with the organization.

#### ***INTIMIDATION AND THREATS: Control Measures***

Educate workers on how to recognize intimidation and establish an environment where they feel comfortable reporting occurrences.

Interview workers in confidence to help manage potential situations where they may feel intimidated or threatened.

#### ***Monitoring Mechanism***

Record the occurrence of training concerning intimidation and threatening actions.

#### ***RETENTION OF IDENTITY DOCUMENTS: Control Measures***

Require companies to ensure that workers retain their identity documents and provide individuals with safe storage they can access at any time.

Ensure compliance with Canada Revenue Agency, IFTA and PIPA regulate the length of time some documents need to be kept, which magnifies the need to follow these practices.

#### ***Monitoring Mechanism***

Record compliance and ensure workers are aware of how documents are stored in the correct location and are retained for the correct length of time.

#### ***COMPENSATION AND BENEFITS : Control Measures***

Ensure all workers are fairly compensated according to national employment law. Incorporate the use of digital payment wage systems that register working records and payments.

Investigate suppliers directly, or through legal authority who are, or are suspected, of withholding wages, as to if this is appropriate

#### ***Monitoring Mechanism***

Conduct annual pay equity audits and to ensure continued alignment with compensation in accordance with applicable provincial and national legislation.

Ensure workers understand how and when they are compensated and where to find copies of their pay statements, records of hours work, pay deductions, etc.

**EXCESSIVE WORKING HOURS: Control Measures**

Utilize pay classifications that correspond with employment codes across relevant jurisdictions. Review and assess working hour systems to ensure any overtime is performed voluntarily, without coercion or threats, and in accordance with industry standards. Document and investigate any reported instances of coercion or undue pressure related to overtime work.

**Monitoring Mechanism**

Record any incidence of coercion or threats associated with overtime occurrence.

**ABUSIVE WORKING AND LIVING CONDITIONS: Control Measures**

Ensure any worker housing adheres to local legislation, and all workers are provided adequate working conditions.

Conduct training regarding effective communication between workers and supervisors around working conditions and safety risks.

**Monitoring Mechanism**

Record reports or directly observe incidents of abusive working and living conditions.

**5. Policies and Due Diligence**

*Apex maintains and ensures adherence to workplace policies to ensure there is no forced labor and child labour within the organization. This includes only hiring employees consistent with the Canada Labour Code provincial Employment Standards Act.*

## **6. Assessing Effectiveness**

*The effectiveness of human rights and compliance with the Canadian Act is shared amongst all employees and stakeholders. The Modern Slavery SWP will be monitored regularly for effectiveness, questionnaires for suppliers will be distributed, and components of the Act will be reviewed regularly as part of the Apex HSE program.*

## **5. Approval and Attestation**

*Apex will review its Modern Slavery and Trafficking Report annually in conjunction with best practices and in consultation with employees, managers, and stakeholders.*

*In accordance with the requirements of the Canadian Act, and based on my knowledge, and having exercised reasonable diligence, I attest that I have reviewed the information contained within this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year 2025.*

*Rob Bengtsson*



*Chief Operating Officer*

**Apex Oilfield Services (2000) Inc.**

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