



# **MODERN SLAVERY** REPORT 2023

Joint Report Under the Modern Slavery Act 2018 (Australia)

Published: May 3, 2024



# Introduction

Ensign Energy Services Inc. is dedicated to acting as a good corporate citizen and to promote the development and maintenance of good corporate practices throughout Ensign Energy Services Inc. and all of its domestic and foreign subsidiaries and affiliates (individually or collectively, "Ensign"). As part of this commitment, Ensign has in place a Code of Conduct and a Supplier Code of Conduct which sets out Ensign's expectations of its employees and its vendor, suppliers, and third party service providers, respectively. Ensign is committed to labour and human rights, health, safety, and environment, and business integrity and expects its suppliers, vendors, and service providers to align to these standards. Ensign has developed its requirements in accordance with the United Nations (UN) Global Compact ten universally accepted principles, and other internationally recognized standards.

## Our Structure & Operations

### Reporting Entities' Legal Names:

- Ensign (Australia) Holdings PTY Limited ("EAHP")
- Ensign Australia (PTY) Limited ("EAPL")

### Financial Reporting Year:

2023

### Identification of Joint Report:

Yes

### Identification of Reporting Obligations in Other Jurisdictions:

None

### Sector / Industry:

Petroleum and Natural Gas

### Location:

Registered offices of EAHP and EAPL are located in Edinburgh North, South Australia.

### Reporting Entities Structure:

Both EAHP and EAPL are corporations incorporated under the laws of New South Wales and are wholly owned subsidiaries in the Ensign Energy Services Group of Companies.

### Organizational Structure:

Ensign Energy Services Inc. ("ESI"), an Alberta corporation (Canada), which is publicly traded on the Toronto Stock Exchange, and is the ultimate parent company of the Ensign Energy Services group of companies. ESI is the ultimate parent company of EAHP and EAPL. EAHP is a holding company while EAPL is the primary operating entity of the Ensign Energy Services Group of Companies in Australia.

### Activities of Entities:

ESI is a holding company and the ultimate parent company of the Ensign Energy Services group of companies. The Ensign Energy Services group of companies provide oilfield services to the crude oil and natural gas industries in three main geographic operating regions:

- Canada;

- United States; and
- International (Argentina, Venezuela, Bahrain, UAE, Kuwait, Oman, and Australia).

The oilfield services it provides include drilling, well servicing, oil sands coring, directional drilling, underbalanced and managed pressure drilling, equipment rentals and transportation.

We provide a more detailed explanation of our business activities on our website:

[www.ensignenergy.com](http://www.ensignenergy.com)

Neither EAHP nor EAPL are involved in the production of goods; however, EAPL is involved of the sale of goods that are ancillary to its drilling operations, such as consumables used on its drilling rigs. These goods are procured generally from Australian suppliers. Further, while the vast majority of the goods utilized by EAPL in its operations are purchased as landed goods (i.e. imported by a Australian supplier), from time to time, EDI does import goods into Australia for use in its provision of services.

**Management Systems:**

Overall Responsibility	Vice-President, Global Human Resources and General Counsel
Responsibility for Internal Due Diligence	Human Resources Department
Responsibility for Due Diligence of Third Parties	Supply Chain Department
Responsibility for the Reports of Contravention (Process)	Legal Department
Training	Human Resources Department

# Our Supply Chain

The Ensign Energy Services group of companies’ Global Supply Chain Team sources goods across the globe. With respect to its activities in Australia, it engages hundreds of vendors, suppliers, and service providers in Australia, each year, ranging from large multi-nationals to local family businesses. The majority of such suppliers, vendors, and service providers are Australian corporations, including

Australian subsidiaries of multi-national corporations. Generally, goods and services are purchased through Ensign standard form contracts which require compliance with applicable laws, including all Australian legislation. A number of our suppliers source their products globally, which are imported into Australia, and sold through local subsidiaries.

# Applicable Policies

EAPH and EAPL are committed to labour and human rights, health, safety, and environment, and business integrity and expects its suppliers, vendors, and service providers to align to these standards. ESI has developed its requirements in accordance with the United Nations (UN) Global Compact ten universally accepted principles, and other internationally recognized standards. As part of the processes to reduce the risk of modern slavery, ESI has implemented throughout the Ensign Energy Services group of companies, a Supplier Code of Conduct as well as requiring all vendors, suppliers, and service providers to complete an assessment which identifies the risk of modern slavery as well as other integrity issues. ESI and EDI’s relevant commitment to conduct business in an ethical fashion are set out in the following policies:

- [Ensign Code of Conduct](#)
- [Ensign Supplier’s Code of Conduct](#)

**Minimum Age Requirement Policy:**

This policy provides that, in addition to restrictions imposed by applicable law, individuals under the age of 18 are not permitted to be employed in: (i) field positions; (ii) “safety sensitive” positions; and (iii) positions classified as “high risk”. Exceptions are permitted with approvals of the Vice-President of the applicable division, Vice-President of Health, Safety and Environment, and Director of Human Resources of the relevant division.

# Due Diligence Process

## 1 Internal

The Human Resources department ensures that all employees are legally permitted to work in the applicable jurisdiction (including age and work permits) and that offers of employment are provided to all new and returning employees which are accepted by such employees (i.e. employees have ability to reject the offer).

## 2 Third Parties

- Commencing in 2023 and continuing in 2024, ESI has implemented a process throughout the Ensign Energy Services group of companies requiring all current and new vendors, suppliers, and service providers to complete an assessment questionnaire which has been prepared for the purpose of identifying areas of risk, including child labour or forced labour. Further, if a vendor, supplier, or service provider is identified as having a higher probability of child slavery, forced labour, or other contraventions of our Supplier Code of Conduct, we will arrange for an in-person inspection of the relevant manufacturing facility. Going forward, vendor and suppliers will be required to complete the questionnaire on a biennial basis.
- With respect to third party consultants, we utilize contractual and informal confirmation that all services are provided by individuals who are legally permitted to work within the applicable jurisdiction and that no services are provided by either children (as defined in applicable legislation) or forced labour.

# Areas of Risk

Area of Risks were determined through assessments being conducted by the applicable heads of the relevant departments. Such assessments identified areas where the potential of either child labour or forced labour occurring in its operations. Risk analysis undertaken on this basis indicates that the risk of child labour and/or forced labour practices in the first tier of EAPL's supply chain is very low. However, certain items used in EAPL's operations are routinely imported from outside of Canada by EAPL's vendors and suppliers. The risks of child labour and/or forced labour practices, while low in the immediate supply chain interface, may exist in layers further up the supply chain. Notwithstanding the foregoing, third party manufactured goods which are purchased internationally, including vendors operating in China which provided

drill pipe, represented an area where child labour and/or forced labour could occur. As a result, in addition to the assessment questionnaire, direct communication occurred between ESI's Supply Chain group with the relevant supplier regarding these matters.

Additionally, ESI has in place an anonymous whistleblower hotline / website that is available for employees and third parties to provide reports of any integrity / compliance issues which may arise, including any potential modern slavery. Each report is fully investigated and dealt with accordingly.



# Remediation Measures



Neither EAPH nor EAPL are aware of any instances of forced labour or child labour in either its own operations or those of its vendors, suppliers, or service providers. Accordingly, we have not taken any remedial action.

However, in the event that EAPH or EAPL became aware of any forced labour or child labour, the following are remedial measures that may be taken, based on the circumstances:

1

## Internal and Third Party Consultants:

Discipline up to and including termination of individual responsible for hiring contravening labour or purchasing the prohibited goods to the extent that the exercise of reasonable due diligence would have identified such contravention.

2

## Third Party Vendors, Suppliers, and Consultants:

Initially, EAPH or EAPL would work with the applicable vendor, supplier, or service provider to improve the situation and facilitate the cessation of the use of child labour and/or forced labour. Specific strategy would be dependent on the situation. In the event that such efforts do not result in the third party ceasing the use of forced labour or child labour, termination of contract with third party would occur.

## Remediation of Loss of Income

EAPH and EAPL are not aware of any instances of any instances of forced labour or child labour in either its own operations or those of its vendors, suppliers, or service providers and therefore have not taken any actions.

## Training

Training regarding the prohibition of the use of child labour or forced labour, whether directly or indirectly, by any member of the Ensign Energy Services Group of companies is included in our Code of Conduct training which is required to be completed by all employees and directors on an annual basis.

## Assessing Effectiveness

The implementation of the applicable policies will occur on a regular cycle to determine its effectiveness.

# Attestation

This report has been approved by the Boards of Directors of Ensign (Australia) Holdings PTY Limited and Ensign Australia PTY Limited. in accordance with their respective applicable laws, by-laws and internal policies.

In accordance with the requirements of the Act, and in particular Section 14(2)(d)(i) of the Modern Slavery Act 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.

I have the authority to bind Ensign (Australia) Holdings PTY Limited and Ensign Australia PTY Limited.



**Robert H. Geddes**

President and Chief Operating Officer

May 3, 2024