



## **FLINT Corp.**

# **Fighting Against Forced Labour and Child Labour in Supply Chains Report Year ended December 31, 2023**

Pursuant to subsection 11(2) of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C., 2023, c. 9 (the “Act”), this report is made jointly by FLINT Corp. and the entities listed in Schedule “A” that it controls, including joint ventures which it operates. FLINT Corp. is headquartered in Calgary, Alberta and its common shares trade on the Toronto Stock Exchange under the symbol FLNT. As required by the Act, this report presents our forced labour and child labour reporting statement for the financial year ending December 31, 2023. It summarizes the actions taken to prevent and reduce the risk that forced labour and child labour is used at any step of the production of goods in Canada by FLINT or of goods imported into Canada by FLINT. Where this report refers to “FLINT”, the “Company”, “we,” “us” or “our,” it is a reference to all the reporting entities.

### **1. Steps to Prevent and Reduce the Risks of Forced Labour and Child Labour in 2023**

At FLINT, our purpose is to help customers bring their resources to our world and our mission is to be the service company of choice for our stakeholders. Our organization’s core values are Safety and Quality Always, Lead, Collaborative, and Competitive. Our people are committed to providing high quality services and products safely within the framework of our core values. Our culture thrives on collaboration, diversity, and a shared passion for excellence. We are committed to operating in a safe, ethical, inclusive, transparent, and socially and environmentally responsible manner, including respecting human rights and contributing to the communities in which we live and work.

During 2023, FLINT conducted a review of the certain policies and procedures as they relate to risks and responsibilities associated with forced labour and child labour and child protection policies. Listed below is a summary of the actions taken to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- We have revised our Procure to Pay (P2P) Policy to incorporate ethical procurement principles as part of our regular business practice and supplier selection. Procurement outside of Canada is limited and all subcontracted labour is sourced from Canadian companies in alignment with the laws and regulations of Canada.
- We have reviewed and communicated our Whistleblower Policy whereby employees, contractors and suppliers have an avenue to share complaints in a confidential and anonymous manner. The platform is administered by a third-party provider and matters are investigated by internal representatives to ensure compliance with policy and legislation.

- We have reviewed our Minimum Age Policy, which is in place to ensure all employees are above the age of 18. Should the Company hire someone below the age of 18, they must meet the following criteria:
  - a. The employee is a participant in an industry recognized work experience program (e.g., Registered Apprentice Program in Alberta for high school students);
  - b. The employee is a summer student and is working in an office environment;
  - c. The employee is engaged in office work; or
  - d. The employee is engaged as a labourer or apprentice in a company shop facility or yard, and in accordance with all applicable provincial employment standards legislation.

On an annual basis, employees are required to sign or provide electronic acknowledgement of our key policies, including but not limited to, the Code of Conduct and Ethics Policy, the Whistleblower Policy, the Respect in the Workplace Policy and the Information Technology Acceptable Use Policy.

## **2. Structure and Operations**

FLINT provides asset integrity services to energy and industrial markets, including oil and gas (upstream, midstream and downstream), petrochemical, mining, power, agriculture, forestry, infrastructure and water treatment. With offices strategically located across Canada and a dedicated workforce, FLINT's services included: maintenance and turnarounds; wear technologies and weld overlays; fabrication, modularization and machining; facility construction; pipeline installation and integrity; high voltage construction; electrical and instrumentation; workforce supply; heavy equipment operators; and environmental services.

As at December 31, 2023, FLINT had approximately 3,200 employees. The number of employees working on the various sites can vary depending on seasonality and client demand. The senior executive team and head office is located in Calgary, Alberta.

FLINT's products and services can be broadly grouped into three categories: (a) maintenance and construction services; (b) wear technologies; and (c) environmental services.

### **a. Maintenance and Construction Services**

Maintenance and Turnarounds: These services support all aspects of pipeline and facility maintenance and management, including planning and scheduling, cost control, procurement, regulatory compliance, logistics and material management, warehousing and the supply of skilled plant operators and trade professionals. Supplemental and operational maintenance services include providing complete plant and field support, quality control, field operations and safety management systems personnel. FLINT's maintenance services often include the provision of materials and equipment required to execute day-to-day maintenance services. Shutdown and turnaround services are fully integrated and designed to minimize plant and facility downtime and support long-term asset integrity. In plant turnarounds, where a facility is shut down for a period of time for service and repair, FLINT is typically involved from the start of shutdown planning through to the completion of the turnaround.

Facility Construction: FLINT provides complete plant and facility construction services, including project planning and constructability, estimating and scheduling, project and construction management, fabrication and modular construction, field construction and workforce supply. The facility construction business is complemented by maintenance service offerings after the completion of construction.

Pipeline Installation and Integrity: FLINT provides full cycle services for small diameter pipeline construction of laterals, tie-ins and gathering lines and above ground pipelines, from constructability planning through to construction execution. FLINT also provides pipeline integrity dig services, which involve determining the exact location for the integrity dig while adhering to strict ground disturbance procedures.

Electrical and Instrumentation: FLINT provides a complete range of electrical and instrumentational construction and maintenance services to the energy, commercial and industrial markets. Construction services range from major facility construction to plant expansions and upgrades.

High Voltage Construction: FLINT provides high voltage construction services, including material procurement and project construction and management, to power generating facilities and substations for regulated utilities, industrial and municipal-owned electric utilities, oil and natural gas producers, independent power generators and wind farms.

Fabrication, Machining and Modular Assembly: This business line includes piping fabrication, modular fabrication, modular assembly, skid packages, vessel dressings, structural fabrication and machining services (including manual and computer numeric control and sub arc and orbital welding). These services are provided out of the Company's fabrication shops located throughout Alberta and in Fort St. John, British Columbia.

#### **b. Wear Technologies**

FLINT's Wear Technologies division is a solutions-based provider that manufactures and distributes the AssetArmor™ product line, which provides asset protection from abrasion, corrosion and erosion. This division also provides fabrication services, including piping, specialty alloys, custom designed components, structural steel assemblies and pressure vessel fabrication services. The products are developed and fabricated out of facilities located in Sherwood Park (two facilities), Lloydminster and Airdrie, Alberta.

FLINT's patented technologies, marketed as AssetArmor™, prolong the component life of steel pipes, vessels, and plates used in harsh operating conditions by protecting them against the harmful and costly effects of abrasion, erosion, corrosion, and impact. The technology has applications in any industrial use that requires steel component protection. The AssetArmor™ product line consists of overlay pipe spools, pipe bends, wear plates, custom overlay solutions, chrome white iron spools and asset integrity monitoring. AssetArmor™ products are sold throughout North America primarily to downstream facilities across a range of industry markets, including oil and gas, oilsands, refining, pulp and paper, petrochemicals, power, pipeline, mining and industrial fabrication.

#### **c. Environmental Services**

FLINT Environmental Services provides environmental consulting and field services to clients across various end markets, such as oil and gas, pipeline, forestry, mining, power and government. The environmental services business complements the fabrication, construction and maintenance service offerings, enabling FLINT to provide its customers with services that span the full project lifecycle, from construction to decommissioning.

This business line includes full-scope environmental and regulatory compliance services, from the initial planning stage (pre-construction assessments, regulatory licensing and permitting), through the operational stage (amendments or renewal applications, water, air and soil monitoring, waste management reporting and spill response), to site abandonment and decommissioning, as well as the

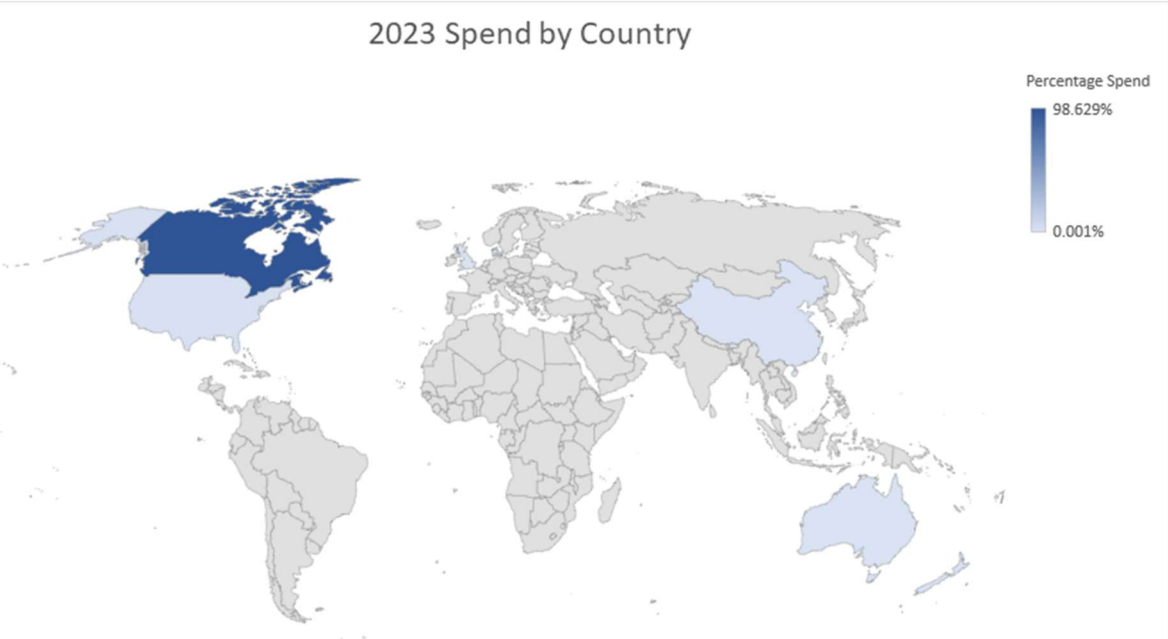
remediation and reclamation stage (Phase 1 and 2 environmental site assessments, remedial excavations, and full site reclamation including regulatory submissions and notifications).

**3. Supply Chains**

FLINT's procurement activities are focused on local, Canadian suppliers which comprised approximately 99% of third party spend by FLINT In 2023. The steps taken in 2023 to prevent and reduce the risk that forced labour and child labour is used were focused on data gathering and analysis to identify any areas of the supply chain where further risk mitigation may be required. We understand that some of the suppliers may supply products that originate from international locations. Our suppliers are engaged through our corporate services team in both supply chain and estimating, as well as through our Operations teams. Through prequalification verifications and requirements set for approval of suppliers, we strive to build relationships with suppliers who align with our values.

FLINT endeavors to work with direct suppliers who operate legally, ethically, and responsibly, using prequalification criteria to assess that they are aligned with our safety and quality requirements, and to protect us from potential legal and reputational risks. Our prequalification assessment includes health, safety, environmental, technical compliance, financial considerations, and sustainability requirements including local and Indigenous content.

The following chart and table show where FLINT sourced its materials in 2023.



COUNTRY	CANADA	UNITED STATES	HONG KONG	CHINA	DENMARK	AUSTRALIA	UNITED KINGDOM	NEW ZEALAND
% Spend	98.629%	1.165%	0.170%	0.026%	0.005%	0.003%	0.002%	0.001%

#### 4. Policies and Due Diligence Practices

FLINT has implemented policies and practices aimed at supporting human rights and socially responsible business practices. FLINT requires its personnel, contractors and suppliers to act in accordance with its policies and in so doing supports human rights and social responsibility.

FLINT has standard form supply chain contracts used for suppliers, which include requirements for supplier compliance with applicable laws and FLINT policies (including the Code of Conduct and Ethics Policy).

The following table summarizes our key policies that encourage and promote a culture of ethical business conduct.

Policy	Overview	Policy in Action
Code of Conduct and Ethics Policy	<p>The Company has adopted a Code of Conduct and Ethics Policy (the "<b>Code</b>") that applies to all directors, officers, employees and service providers (each, a "<b>Covered Party</b>"). The principles of the Code encourage and promote a culture of ethical business conduct by establishing standards of conduct by which each Covered Party must abide.</p> <p>Each Covered Party has a responsibility to:</p> <ul style="list-style-type: none"> <li>(i) avoid apparent or actual conflicts of interest;</li> <li>(ii) avoid actions or behaviours that could create an uncomfortable or hostile work environment;</li> <li>(iii) protect the Company's assets;</li> <li>(iv) ensure confidential information remains confidential;</li> <li>(v) discharge their duties in compliance with applicable laws; and</li> <li>(vi) report violations of the Code of which such Covered Party becomes aware.</li> </ul> <p>The Board, through the Chief Financial Officer of the Company, is responsible for monitoring compliance with the Code. Upon accepting a position with the Company, a new director, officer, employee or service provider is required to provide an acknowledgement of their commitment to comply with the Code. In addition, each Covered Party is required to acknowledge their compliance with the Code on an annual basis.</p>	The Code of Conduct and Ethics Policy applies to all directors, officers, employees and service providers in all jurisdictions in which we operate.

<b>Policy</b>	<b>Overview</b>	<b>Policy in Action</b>
Whistleblower Policy	<p>The Whistleblower Policy provides a mechanism for employees, contractors and suppliers with serious concerns about any aspect of the Company’s operations to come forward and voice those concerns on a confidential and, if desired, anonymous basis.</p> <p>This policy makes it clear that FLINT expects all employees to act responsibly to uphold the reputation of the organization and maintain public confidence and employees can report such matters without fear of discrimination, harassment or persecution.</p>	The Whistleblower Policy applies to all employees, contractors and suppliers in all jurisdictions in which we operate.
Minimum Age Policy	<p>The Minimum Age Policy supports our commitment to a safe workplace and enforces an age restriction in accordance with the applicable provincial Employment Standards and Human Rights legislation. A person under the age of 18 may only be employed to do work on at a FLINT facility or site if the employee is: (a) a participant of an industry recognized work experience program; (b) is a summer student and is working in an office environment; (c) is engaged in office work; or (d) is engaged as a labourer or apprentice in a company shop facility or yard, and in accordance with all applicable provincial employment standards legislation.</p>	The Minimum Age Policy applies to all personnel and contractors and suppliers of FLINT.
Subcontractor Management Policy	<p>The purpose of this policy is to clearly define rules and expectations regarding the prequalification, contracting, and management of subcontractors performing work on a FLINT managed site.</p>	The Subcontractor Management Policy applies to FLINT Corp. and all companies where FLINT is a majority owner.
Procure to Pay Policy	<p>The purpose of this policy is to clearly define rules and expectations regarding the procurement of goods and services, confirmation of receipt of goods or verifications of services rendered, and processing of payment to the supplier.</p> <p>It defines the supplier selection process and purchasing process.</p>	The Procure to Pay Policy applies to FLINT Corp. and all companies where FLINT is a majority owner.

## **5. Identifying Modern Slavery Risks, Managing Modern Slavery Risks and Remediation Measures**

In 2023, FLINT has not identified any instances of forced labour or child labour in its operations or supply chain. As a result, it has not had to take any measures to remediate any forced labour or child labour, and has identified its risk as minimal.

We are committed to providing access to effective reporting mechanisms related to concerns arising from compliance with our policies. This is substantiated through our Whistleblower Policy.

We are satisfied that, because of recruitment, remuneration and compliance measures throughout our operations, there is minimal risk that any of our employees are at risk of modern slavery. We continue to be guided by our policies and principles in our relationships with our partners, including working with reputable companies, who are required to comply with domestic and international laws.

As FLINT continues the development of its program to prevent and reduce the risks of child and forced labour in its supply chains and operations in 2024, we will consider and implement measures to assess the effectiveness of these processes.

## **6. Training**

Although we do not carry out dedicated training on forced/involuntary labour, child labour and slavery, we issue our Code of Conduct annually for our employees/contractors to electronically acknowledge that they have read and understood the Code of Conduct, and to reiterate what is expected of them in the performance of their duties.

## **7. Approval and Attestation**

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of FLINT Corp. for all reporting entities.

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. 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 2023.

I have the authority to bind FLINT Corp. and the reporting entities.

Date: May 6, 2024

(signed) "H. Fraser Clarke"

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H. Fraser Clarke  
Chair of the Audit Committee

**Schedule "A"**

**Wholly-owned subsidiaries of FLINT Corp.:**

FLINT Energy Services Limited Partnership

FLINT Wear Technologies LP

ClearWater Energy Services LP

FLINT Equipment LP

FLINT Real Estate LP

**Joint Ventures involving FLINT Corp.:**

521855 Alberta Ltd. (50% Working Interest and Operator)