



FORCED LABOUR IN CANADIAN SUPPLY CHAINS 2023 ANNUAL REPORT

1. Identifying Information

Reporting Entity Legal Name:	Civeo Canada LP
Financial Reporting Year:	2023
Revised Report (yes/no):	No
Business Number:	783188485
Other Jurisdictional Reporting Obligations:	Australia
Report Type:	Single
Structure:	Limited Partnership
Activities:	Procuring of goods and foods; Manufacturing of foods
Sector/Industry:	Hospitality; Accommodation Services
Location:	Canada

2. Measures taken in fiscal year 2023-2024

Steps Civeo has taken to prevent and reduce risk that forced and child labour is used in Civeo's business in Canada and elsewhere:

- HR assigned e-learning on *Complying with Canada's Modern Slavery Law* to its supply chain team. This was assigned and completed in May 2024.
- The Company adopted a Human Rights Policy in 2021, which specifically prohibits any form of child labour, forced labour or modern slavery, or human trafficking. This policy was reviewed in 2024 and complies with the requirements of the forced and child labour legislation.
- The Company adopted a Corporate Code of Business Conduct and Ethics, which requires compliance with all laws and regulations where it does business, and which is reviewed annually and signed off by employees annually.
- The Supplier Code of Business Conduct specifically references the Corporate Code of Business Conduct and Ethics and Human Rights Policy; all suppliers must adhere to both. The Supplier Code of Business Conduct was recently updated and is being sent to all suppliers for renewed sign off.

Steps Civeo has taken to prevent and reduce risk that forced and child labour is used in Civeo's supply chains:

- Civeo's supply chain team has reissued its Supplier Business Code of Conduct to its material vendor base to sign off on and formally agree that they will be compliant with the forced and child labour legislation.



3. Supplementary Information

3.1. Description of Civeo's structure, activities and supply chains

Civeo Canada LP operates as a Limited Partnership. Through its employing entities there are 3,705 employees (at May 27, 2024), of which 1,568 are in Canada and 2,137 are outside of Canada.

Civeo conducts business through a number of partnerships, primarily with Indigenous First Nations in Canada, which provides economic benefit and employment opportunities within those First Nations on their traditional lands.

Activities

Civeo's primary scope is to provide accommodations in remote locations. Civeo and its family of businesses provides workforce lodging and hospitality services to its clients across a wide range of industries but primarily supporting clients in the natural resources sector. Owning and operating over 26,000 rooms in Canada, Australia, and the US, in addition to the properties entrusted to us by our clients, Civeo offers a full suite of hospitality services including lodging, food services, housekeeping, and property maintenance.

Our primary production of goods is related to the purchase of food ingredients from the suppliers as described in this report. Food ingredients are then prepared in the form of meals for our guests and customers.

Supply chains

Civeo operates several lodges in Canada. Civeo's Canadian supply chain is centralized in its corporate office located in Edmonton, Alberta. The supply chain team is responsible for the sourcing and management of contracts and vendor selection in Canada.

Civeo's supply chain works closely with its internal departments to source, prequalify, and manage requirements to operate Civeo's Canadian lodges. Civeo will contract and or procure the following:

- Materials: all requirements to provide lodging services, e.g., food, paper, maintenance, and linens.
- Services: services that are not self-performed, e.g., water and sewage hauling, security, and garbage hauling.
- Construction: major improvements and expansion.
- Utilities: electricity, fuels and city hookups.



The supply chain director and/or designate has the responsibility for overseeing the company's purchasing requirements and approving the selection of suppliers. Selection of suppliers for purchase of materials or services is based on the supplier's ability to meet Civeo's overall needs. A vendor request form must be completed by the requester in collaboration with a supply chain designate. A Supplier Code of Business Conduct must be signed by the supplier. Based on assessment and information collected, the request form must be approved by the Supply Chain Director or designate.

In 2023, Civeo's top 10 vendors % of total spend were:

- Groceries: 31.88%
- Services: 21.49%
- Construction: 4.66%
- Utilities: 8.89%

All materials and services were procured from North American sources.

3.2. Policies and due diligence procedures in relation to forced and child labour

- Vendors are required to sign Civeo's Supplier Code of Business Conduct. When a new version of the Supplier Code of Business Conduct is implemented, all current suppliers are required to re-sign it.
- Civeo's supply chain team conducts a regular review of our policies and procedures on human rights and labour standards.
- Civeo will look to amend future contract templates to have a section within the contract asking vendors to provide their child and forced labour policies.

3.3. Risk of forced and child labour being in Civeo's business

- It is the responsibility of suppliers we do business with to comply with our policies as they relate to forced and child labour. Given that our major suppliers are based in Canada, provide locally produced materials, and are required to comply with our policies, there is minimal risk of forced or child labour in our supply chains.

Steps Civeo has taken to assess and manage risk of use of forced and child labour:

3.4. Measures taken to remediate any forced or child labour

- At this time, Civeo is not aware of any forced or child labour in its supply chains and therefore, has no reason to remediate any forced or child labour concerns.

3.5. Measures taken to remediate loss of income to the most vulnerable families resulting from Civeo's elimination of forced and child labour from its activities and supply chains



- At this time, Civeo is not aware of any forced or child labour in its supply chains and therefore, has no reason to remediate any forced or child labour concerns.

3.6. Training

The following sessions have been completed by the Civeo supply chain team:

- *Complying with Canada's Modern Slavery Law* (e-learning module)
- Supply Chain Canada Training Video – October 5, 2023: [Bill S-211 – Are you and your organization ready?](#)

3.7. Assessing effectiveness in ensuring forced and child labour are not used in Civeo's business or supply chains

- At this time, Civeo is developing measures to assess our effectiveness and working with our suppliers to ensure that our supply chains are doing the same. Civeo is actively managing its tier one vendors and requiring those tier one vendors to confirm their own supply chains are in compliance with the forced and child labour legislation.

4. Approval

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act), and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity 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.

2024-05-29 | 2:54 PM MDT

Date

DocuSigned by:

Allan Schoening

Allan Schoening

President, Canada

I have the authority to bind Civeo Canada LP