

VAN LEEUWEN



2023 Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

Van Leeuwen Pipe and Tube is a large international company with leading expertise in steel pipes and pipe and tube applications. This family-owned business, with its head office in Zwijndrecht, the Netherlands, was founded in 1924 and has about eighty largely stock-keeping branches throughout the world. Apart from an extensive range of pipe and tube products, we offer specialized knowledge and advice, custom material treatments and processing, logistics services and much more.

As a group of companies, Van Leeuwen is committed to respecting, upholding, and applying the highest Human Rights and ethical standards across the economies and societies in which we operate. Our approach is guided by 10 Principles of the United Nations' Global Compact ("UNGC"), with which Van Leeuwen complies. Where national law and the standard under the UNGC differ, Van Leeuwen will follow the higher standard unless this would contravene the national law. The UNGC principles are given effect through Van Leeuwen Group policies, including our Code of Conduct.

Van Leeuwen Pipe and Tube (Canada) Inc., our Canadian distribution business, is predominantly focused around servicing the oil and gas sector - importing and distributing steel pipe, fittings, and flanges based on customer requirements. Much of this material is sourced from globally approved manufacturers outside of Canada as many of the goods required are not manufactured in Canada. Many of our end user customers are publicly traded and require Van Leeuwen Canada to supply manufacturers based on their own internal Approved Manufacturer Lists, which they have approved through their own due diligence.

Due to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), Van Leeuwen Canada has taken further steps to increase our due diligence with our supply base, in conjunction with the Van Leeuwen group of companies. To prevent and reduce the risk that force labor or child labor is used, Van Leeuwen Canada has extended the Van Leeuwen Supplier Sustainability Code to top suppliers to review and receive sign off on their adherence to this code. We have not become aware of any situations that would raise concerns in relation to the Act, therefore no remediation actions have needed to be taken.

Van Leeuwen Canada does not currently have a specific training program in place regarding the Act. However, the Act is known to the Management, Purchasing, and Finance teams. Van Leeuwen Group's Code of Conduct covers the UNGC principles, including fair employment practices and combatting modern slavery. All employees are required to review and sign off on the Code of Conduct.

In order to assess our effectiveness in compliance with the Act, Van Leeuwen Canada ensures that all purchases are in line with Van Leeuwen Group sanction and embargo policies. Locally, this is overseen by our Compliance Representative, reporting to the Van Leeuwen Group Head of Compliance.

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Van Leeuwen Group Core Human Rights Principles

Discrimination

Van Leeuwen does not tolerate discrimination in any form. More specific, we do not tolerate discrimination based on any arbitrary ground such as gender, age, religious belief or creed, race, ethnic or social origin, marital status or pregnancy, family responsibility, culture, health status, disability, sexual orientation or gender orientation.

Diversity & inclusiveness

Van Leeuwen actively seeks to encourage and enable a working environment open to diversity, ensuring equal treatment of all people in access to opportunities and advancement. This extends to allowances for religious or cultural observances where possible to do so.

Fair employment practices

Van Leeuwen operates the following practices in its operations:

- Recognition of the right to freedom of association by employees to join trade unions. Van Leeuwen will make orderly arrangements for recognition, collective bargaining and dispute resolution in accordance with national legislation.
- Employees are paid competitive market related salaries and we endeavor to ensure good access to health care and retirement provision.
- Implementation of employment policies in accordance with national legislation, and include adequate provisions for health, welfare and annual leave.

Combatting modern slavery

Van Leeuwen strongly supports the elimination of all forms of modern slavery, which is entirely at odds with our core values of honesty, integrity and respect for people. We endeavor to ensure that workers in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, such as child labor, forced labor, trafficking, slavery, discrimination, or harassment.

Customers, suppliers and employees have access to our externally facilitated Speak Up line, where any concerns can be reported anonymously and is followed up by specialist investigators.

Learning and development

Van Leeuwen believes that all employees should have access to relevant learning opportunities as and when required. In addition to on-the-job learning supported by coaching and mentoring, functional and centrally driven development learning interventions are provided to all staff in line with agreed development plans.

A safe working environment

Van Leeuwen is strongly committed to ensuring a safe working environment and work practices through policies and management frameworks designed to protect our employees, customers, suppliers, the environment and the communities in which we operate, and which comply with international best practices, standards in addition to local legislation.

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Respect for the environment

Van Leeuwen is committed to minimize our impact on the environment. We also ensure that our suppliers commit to this. Going forward, we will publish annual reports that explain our initiatives and assess their effectiveness against current frameworks for corporate sustainability.

Anti-bribery and corruption

Van Leeuwen recognizes that corruption undermines the rule of law and confidence within the commercial sector. It impoverishes states and distorts free trade and competition. Van Leeuwen is committed to transparency and conducting business with integrity. This includes implementing effective measures, procedures and processes designed to prevent, detect and address bribery and corruption.

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 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.

Graham Watts

Graham Watts
Regional Managing Director – North America
May 30, 2024

I have the authority to bind Van Leeuwen Pipe and Tube (Canada) Inc.