



**SUBJECT:** DNOw Canada Modern Slavery Report

**Reporting Year:** 2023

**Owner:** Director of Corporate Compliance

This report applies to DNOw Canada ULC (Canadian Business Number: 121684302), its affiliates and subsidiaries (collectively referred to herein as “DNOw”) and is made pursuant to Bill S-211 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (referred to herein as the “Canada Modern Slavery Act”). DNOw is a leading global supplier of energy and industrial solutions, products, and engineered equipment packages. DNOw provides an extensive selection of pipe, valves, and fittings, in addition to supplies, and products to the energy and industrial markets worldwide. DNOw has a network of locations spanning over 20 countries, and its online digital channels give customers easy access to the products they need.

Pursuant to the Canada Modern Slavery Act, organisations that supply goods and services, carry on a business or part of a business in Canada, and have assets in Canada and that, based on its consolidated financial statements, has at least \$20 million in assets, has generated at least \$40 million in revenue, and employs an average of at least 250 employees are required to submit a report for each financial year.

This report outlines the standards and policies of DNOw with regard to human rights and modern slavery. DNOw recognizes the significance of eliminating modern slavery and understands that modern slavery can take many forms, including but not limited to, child or forced labour and human trafficking. DNOw also recognizes the responsibility to respect the human rights of its employees and individuals and is committed to taking a zero-tolerance approach to modern slavery within our operations, supply chain, and the communities where we do business. This includes taking the necessary actions to comply with the requirements set forth in the Canada Modern Slavery Act.

DNOw continues to monitor and enforce these obligations through our DNOw Code of Business Conduct and Ethical Standards and our DNOw Supplier Code of Conduct, which provide the expectations and guidelines of DNOw with respect to responsible sourcing throughout our supply chain and prohibits the use of any form of child or forced labor, slavery, or human trafficking. DNOw employees are required to review and complete training annually on DNOw’s Code of Business Conduct and Ethical Standards. DNOw’s Supplier Code of Conduct applies to all first-tier suppliers operating directly with DNOw and labor agencies, third parties, and in-house contractors. DNOw also ensures compliance with fair wage and hour laws in all operations. At DNOw, we will not knowingly conduct business with any supplier or other business partner who violates these standards.

Our commitment to human rights and preventing modern slavery includes encouraging our stakeholders to report any suspected violations or concerns. These reports can be made through DNOw’s anonymous Ethics & Compliance Hotline (visit <https://secure.ethicspoint.com/domain/media/en/gui/40906/index.html> for applicable country dialing information) or via email to [Risk.Mitigation@dnow.com](mailto:Risk.Mitigation@dnow.com). No reprisal or retaliation will be taken against any employee found to be raising concerns in good faith. DNOw will investigate, address, and respond to the concerns of employees and will take appropriate actions as needed.



**SUBJECT:** DNOw Canada Modern Slavery Report

**Reporting Year:** 2023

**Owner:** Director of Corporate  
Compliance

DNOw will: (i) hold suppliers and other business partners accountable for compliance with DNOw's human rights standards, (ii) as part of the tender process, require suppliers and other business partners to confirm that they do not, nor will they in the future, support or knowingly do business with any other party involved in any act of slavery or human trafficking as defined in the Canada Modern Slavery Act, and (iii) utilize the DNOw standard terms and conditions of purchase which specifically require suppliers and other business partners to comply with and enforce applicable laws prohibiting forced labour. Failure of suppliers or business partners to make these commitments, comply with DNOw's standard terms and conditions of purchase, or Supplier Code of Conduct may lead to the termination of business dealings with such suppliers and other business partners.

This report has been approved by the governing body and the Legal and Compliance Departments of DNOw who are responsible for oversight and/or implementation of the applicable policies. This report is reviewed and updated as necessary to ensure that the report is up to date with current DNOw controls and the Canada Modern Slavery Act as required.

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 due 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 attest and confirm that I have the authority to bind DNOw CANADA ULC.

Gail Purdy

Director

May 15, 2024

A handwritten signature in black ink, appearing to read 'Gail Purdy', written in a cursive style.

---