



Sent on behalf of Side Group Affiliate Companies, known as “Side Group”:

Side Group Affiliate Companies: Side Management Ltd., Side Asset Management Ltd., Baron Oilfield Supply (1315599 ALBERTA LTD. & 1315740 ALBERTA LTD.), Baron Industrial Projects, Northern Metallic Sales Ltd., Devco Developments Corp., Northern Metallic Lubricants, Side Group Rail, AAA Safety Services, AAA Field Services, Paragon Oilfield Supply LP., Paragon Oilfield Supply (EDM) Limited Partnership, Paragon Oilfield Supply (DC) Limited Partnership, Northern Metallic Sales FSJ (2019) Ltd., Leyman Distributors – A Division of Northern Metallic Sales (GP) Ltd., Metallic Safety Supply Ltd.

Side Group is strongly committed to conducting its business in a lawful and ethical manner, engaging only with suppliers that are committed to the same principles, to ensure a long-term, sustainable, and successful relationship for all parties.

This Supplier Code of Conduct: Child and Forced Labour (the “Code of Conduct”) describes the requirements and ways of working that Side Group applies together with its upstream supply chain third parties. In some cases, this Code of Conduct goes beyond compliance with applicable laws and draws upon internationally recognized standards to advance social and environmental responsibility. When differences arise between the standards set forth in this Code of Conduct and legal requirements, the stricter standard shall apply, in compliance with applicable law.

Code of Conduct applies to Side Group’s suppliers and their subsidiaries, affiliates, and subcontractors (each a “supplier”) providing goods or services to Side Group, or for use in or with Side Group’s products.

Suppliers shall continuously exercise due diligence to reasonably verify conformance with this Code of Conduct within their supply chain. Suppliers shall develop policies and management systems to identify risks and mitigation measures to correct deviations from this Code of Conduct among their own suppliers.

Human Rights

Side Group believes the protection of human rights throughout our supply chain is a critical part of our mission and is committed to respecting all human rights across our full value chain. This protection applies to all individuals, inclusive of migrant workers, women, and children.

At a minimum, our suppliers shall uphold these human rights standards:

Forced Labour: Suppliers shall not use involuntary, enslaved, forced, prison, or debt bondage labor of any kind. Suppliers shall not be involved in human trafficking activity and shall not use any corporal punishment, physical or psychological abuse, or threats of violence, or coercion to secure or retain their workers. Suppliers shall not require payment of fees or the surrendering of identification as a condition of employment. All workers shall be provided with the terms of their employment in a language they understand.

Child Labour: Any employment of workers under the age of 18 shall not interfere with schooling or vocational education and shall not expose children to risks that could cause health, safety, or moral harm, as specified in the ILO Worst Forms of Child Labour Convention (No. 182).



Freedom of Association and Collective Bargaining: Suppliers shall recognize and respect the rights of employees to freedom of association and collective bargaining. Suppliers shall ensure that representatives of trade unions are not subject to discrimination or harassment.

Anti-Discrimination and Fair Treatment: Suppliers shall treat all workers with respect. There will be no unlawful discrimination, harassment or abuse of any kind based on race, caste, national origin, religious affiliation, age, disability, gender, physical appearance, marital status, sexual orientation, union membership, veteran status, political opinion, or HIV/AIDS status in relation to employment practices such as hiring, promotion, compensation, termination, retirement, or any other aspect of their work.

Wages and Benefits: Suppliers shall provide compensation directly to employees that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards. Where there is no legislated minimum wage, suppliers shall provide wages that are comparable to relevant standard industry wages. Wages shall be paid promptly and in full. Wages shall not be subject to deductions as a disciplinary measure. Wage deductions shall not be used to keep workers tied to the employer or to their jobs.

Work Hours and Overtime: Suppliers shall ensure that work schedules and overtime are consistent with all applicable laws and collective bargaining agreements, whichever affords the greater level of protection, including maximum hour and rest period laws. Workers shall receive annual leave and public holidays in accordance with local law.

Labor Agencies and Recruitment Fees: Suppliers shall ensure that the labor agencies they engage with operate legally and are certified or licensed by the competent authority in their country of operation. Workers shall not be required to pay recruitment fees or hiring-related fees to employers, agents, or labor brokers, unless allowed by local law.

Freedom of Movement: Workers shall have unrestricted access to necessities such as clean drinking water and toilets during both work and non-work hours at the work site or in employer-provided or arranged housing. Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or in premises such as, but not limited to, employer or recruiter operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom.