

# Forced Labour and Child Labour Report

April 1, 2023 – March 31, 2024



**MASTER FLO**  
TM





# Introduction

Master Flo Valve Inc. is a leading Canadian manufacturer, supplier and service provider of products for the energy industry in North America and globally. Master Flo is dedicated to building long-term partnerships with our customers, suppliers, employees and communities while offering customized solutions to address complex industry challenges.

Master Flo's guiding principles are Health, Safety, Environment, Integrity, Quality, Innovation, Independence and Growth. We are committed to conducting our business activities in an ethical, legal, safe, environmentally and socially responsible manner.

We are fortunate to have established long-term relationships with many of our carefully selected suppliers, which are built on foundations of trust and transparency. Even so, Master Flo recognizes the risks of forced labour and child labour in corporate supply chains and has implemented policies and processes to prevent and reduce those risks. Our efforts to prevent forced labour and child labour within our organization and supply chain are outlined in this report.

## Our structure and business activities

Master Flo is a privately owned, Canadian company, headquartered in Edmonton, Alberta. Master Flo specializes in the manufacture and sale of surface and subsea flow management solutions for the

energy sector. Master Flo is a subsidiary of Stream-Flo Industries Ltd., which manufactures, sells and services wellheads, gate valves, check valves and surface safety valves. Our organization's success depends upon the professionalism and dedication of our skilled workforce, which comprises over 1100 employees worldwide.

Certain corporate and administrative functions are centralized within our organization to facilitate the support of core business units and global operations. This centralized approach allows for consistency in processes across the organization.

This report is filed by Master Flo Valve Inc.

## Our supply chain

Master Flo relies upon an expansive network of suppliers, consisting of approximately 955 active global suppliers, primarily in North America and Asia, to source the various materials, parts, components and other goods and services needed to manufacture and sell Master Flo equipment to customers in the energy industry. Global Sourcing, Quality Assurance and Supply Chain (collectively referred to as "Sourcing") are centralized corporate functions that work together to carefully select suppliers who meet our qualification standards and corporate requirements. Our Sourcing team tracks key supplier metrics including performance history, competencies, opportunities for improvement and non-conformances.

## Our policies and due diligence processes

### Our policies

Master Flo communicates our values and expectations through our policies, which demonstrate our commitment to ethical and socially responsible business conduct. Master Flo's [Supplier Code of Ethics](#) ("Supplier Code") and Business Conduct and Social Responsibility Policy ("Social Policy") reinforce our position against the use of modern slavery and provide a framework for ensuring all individuals within our organization and supply chain are treated with dignity and respect. All Master Flo employees are required to undergo mandatory annual online training on the Supplier Code and Social Policy to ensure they are familiar with these policies and to reinforce Master Flo's expectations of both employees and suppliers regarding business conduct.

Master Flo's Supplier Code addresses the risk of child labour and forced labour in our supply chain. It requires our suppliers to operate in a socially responsible and non-discriminatory manner, adhere to governing laws and regulations, and promote safe business practices that are respectful of the human rights of workers. The Supplier Code applies to all our suppliers and is incorporated into our contractual requirements. In addition to other specific protections for workers, the Supplier Code includes the following requirements:

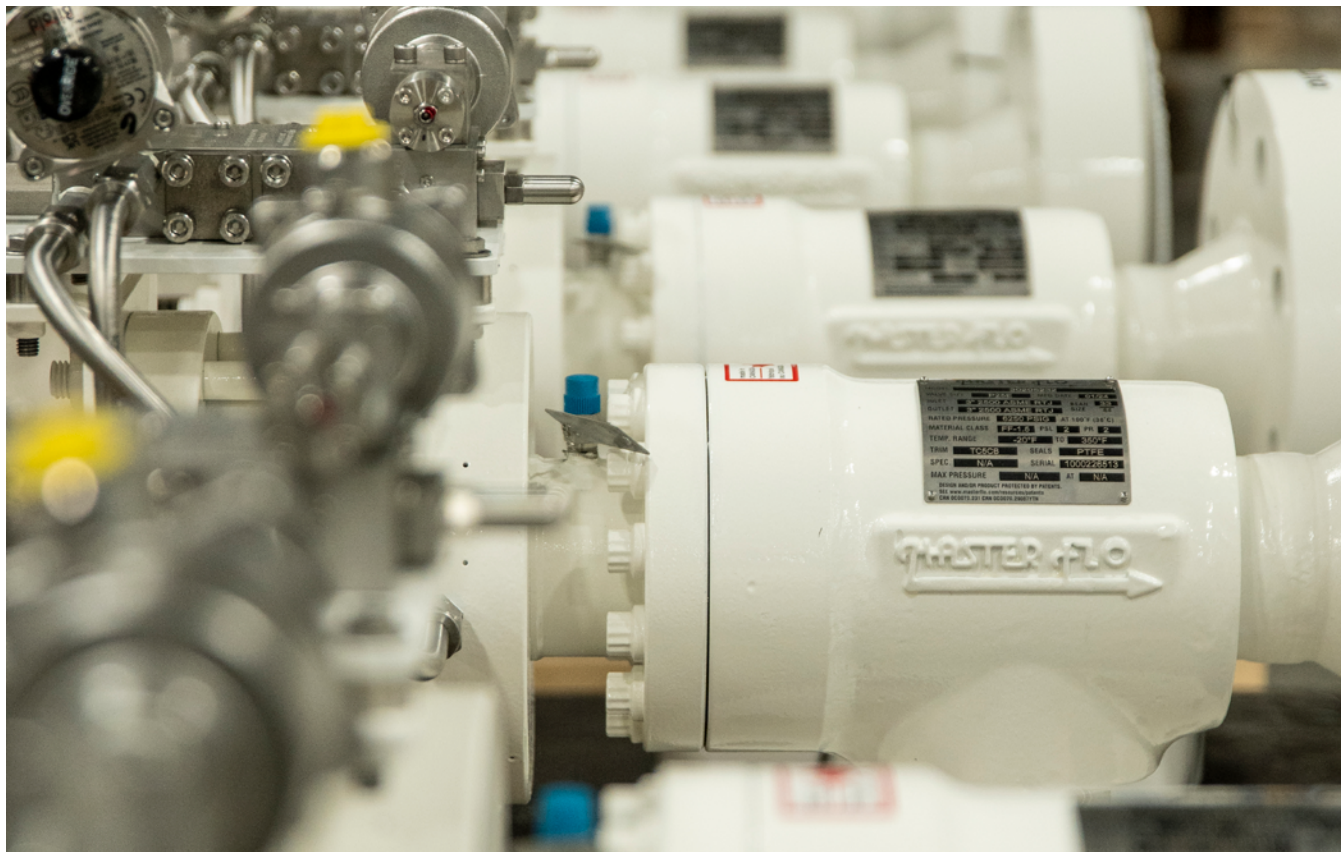
- Suppliers must meet or exceed the minimum standards set out in the Supplier Code relating to compliance with laws, ethical business practices, treatment of workers, and health and safety practices.
- Suppliers must ensure compliance with the Supplier Code throughout their operations and supply chain, including by their suppliers, vendors, subcontractors and agents.
- Suppliers must ensure all labour is voluntary and is not forced labour, child labour, trafficked labour, bonded labour, modern forms of slavery, indentured labour or prison labour.



- Suppliers must ensure that workers are not under the minimum working age or local compulsory school age.
- Suppliers must respect the human rights of their workers, treat their workers with dignity and maintain a safe, healthy and respectful workplace.
- Suppliers must report any non-compliance or violation of the Supplier Code, and any retaliation by a supplier against a whistleblower will not be tolerated.

The expectations in the Supplier Code are reinforced by our Social Policy, which also addresses the issue of modern slavery. Our Social Policy makes it clear that Master Flo does not tolerate any form of child labour, forced labour, slavery or human trafficking; is committed to conducting all operations in a manner that is consistent with upholding human rights; and, expects all business partners and suppliers to share a similar commitment. Both the Supplier Code and Social Policy set out a process for reporting violations.





## Our due diligence processes

### i. Onboarding Evaluation and Risk Assessment

Sourcing is a centralized function that is responsible for the supply chain management process across our organization. Key suppliers must be onboarded and placed on Master Flo's approved vendor list (AVL) to be used in our supply chain. The onboarding process is conducted in accordance with our corporate quality standards, which require an initial evaluation and risk assessment of the supplier prior to their selection or approval for placement on the AVL.

Our Sourcing team evaluates suppliers based on various criteria, including their commitment to identifying and eliminating forced labour and child labour throughout their operations. Suppliers placed on our AVL are continuously evaluated, screened and monitored to ensure compliance with our corporate quality standards.

As part of the initial evaluation and risk assessment, Master Flo categorizes its suppliers as low, medium or

high risk. Depending on the applicable risk category, Master Flo uses one or more of the following methods to collect information about the supplier: interviews, documentation reviews, questionnaires, checklists and audits. The information collected during the onboarding process is designed, in part, to allow Master Flo to ascertain the supplier's:

- adherence to relevant laws, regulations, and standards;
- process controls, including their ability to monitor and manage conditions within their organization and supply chain, to meet or exceed Master Flo's expectations and requirements;
- commitment to the safe and healthy working conditions of workers and treatment of workers with respect and dignity;
- commitment to upholding human rights and rejecting forced or child labour; and

- compliance with Master Flo's policies and procedures, including those related to health, safety and environment and corporate social responsibility.

Master Flo aims to conduct on-site audits of all key suppliers. As part of the audit process, the supplier is evaluated on Corporate Social Responsibility factors, which include factors related to forced labour and child labour. Any failure by a supplier to operate in a socially responsible manner must be brought to the immediate attention of the Global Sourcing Manager. Our supply chain auditors are aware that such violations are treated with the utmost seriousness.

## ii. Ongoing Supplier Management

Once a supplier has been onboarded and added to the AVL, Master Flo continues to manage and reduce risks throughout its relationship with the supplier by conducting biannual risk assessments, at a minimum, and comprehensive audits in accordance with our corporate quality standards. Master Flo also conducts due diligence by using databases and monitoring applicable literature, including the International Child Labour & Forced Labour (ILAB) Report, to identify and evaluate risks of forced labour and child labour within Master Flo's supply chain.

If a potential concern is flagged or a non-conformity is identified with respect to one of our suppliers, our Sourcing team reviews the matter and if appropriate, recommends mitigating measures or corrective actions, which may include termination of the business relationship.

## iii. Reporting of Violations

Master Flo fully endorses and values open and honest communication with respect to the reporting of potential misconduct or violations of law or policy. If a Master Flo employee becomes aware of a concern involving forced or child labour, they must report it to their manager or supervisor without delay. Third party workers who identify or suspect any potential misconduct or violations of law or policy, must report it directly to [info@streamflo.com](mailto:info@streamflo.com). Master Flo does not tolerate any form of retaliation or unprofessional

conduct towards an employee or worker who reports a compliance concern or violation.

## Forced labour and child labour risks and our remediation measures

Master Flo's greatest risk exposure to forced labour and child labour is through our suppliers. We recognize that the risk increases when the goods or the countries from which those goods are procured are at a high risk for human rights violations. We have processes in place to manage these risks during our onboarding and supplier management processes, as outlined above.

After conducting a risk review of our supply chain activities, which included identifying our key suppliers and the geographical regions and industries in which they operate, we did not identify any evidence of forced labour or child labour in our last fiscal year and therefore, did not implement any remediation measures.

## Employee training

Master Flo uses a digital action training system (DATS) to deliver training to its employees. Master Flo has developed training on its policies and processes related to forced labour and child labour, which is administered to all employees using DATS. The training materials include Master Flo's Social Policy and Supplier Code, which must be reviewed by each employee before completing a corresponding quiz. The training materials are intended to educate employees on the expectations Master Flo has of its suppliers and employees, including our prohibition against forced labour and child labour. Our employees are prompted to complete their training as it becomes due and are sent automatic reminders for overdue training. A failure to complete the training or achieve the training competency will result in escalation to the employee's manager. The training is tracked and must be completed annually.

## Our effectiveness

Identifying and eliminating forced labour and child labour in the global supply chain is a complex issue that can only be resolved through partnership and cooperation across various sectors. Further collaboration and dialogue with supply chain partners regarding child labour and forced labour is a necessary step toward the development of a collective solution.

Master Flo has introduced a Supplier Code and contractual language in our supplier terms and conditions related to modern slavery. We have also expanded upon our existing policies, procedures, and processes in an effort to identify and address the risk of child labour and forced labour.

We are committed to continuously evaluating the risk of forced labour and child labour within our organization and supply chain. We are also committed to building upon our due diligence processes and controls to prevent, identify and address the risk of forced labour and child labour in our activities and supply chain.

## Attestation

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 this report for Master Flo Valve Inc. 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.

I have the authority to bind Master Flo Valve Inc.



**Larry Walton**  
President

May 15, 2024



