



**TIDEWATER**  
Midstream and Infrastructure Ltd.

*Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*

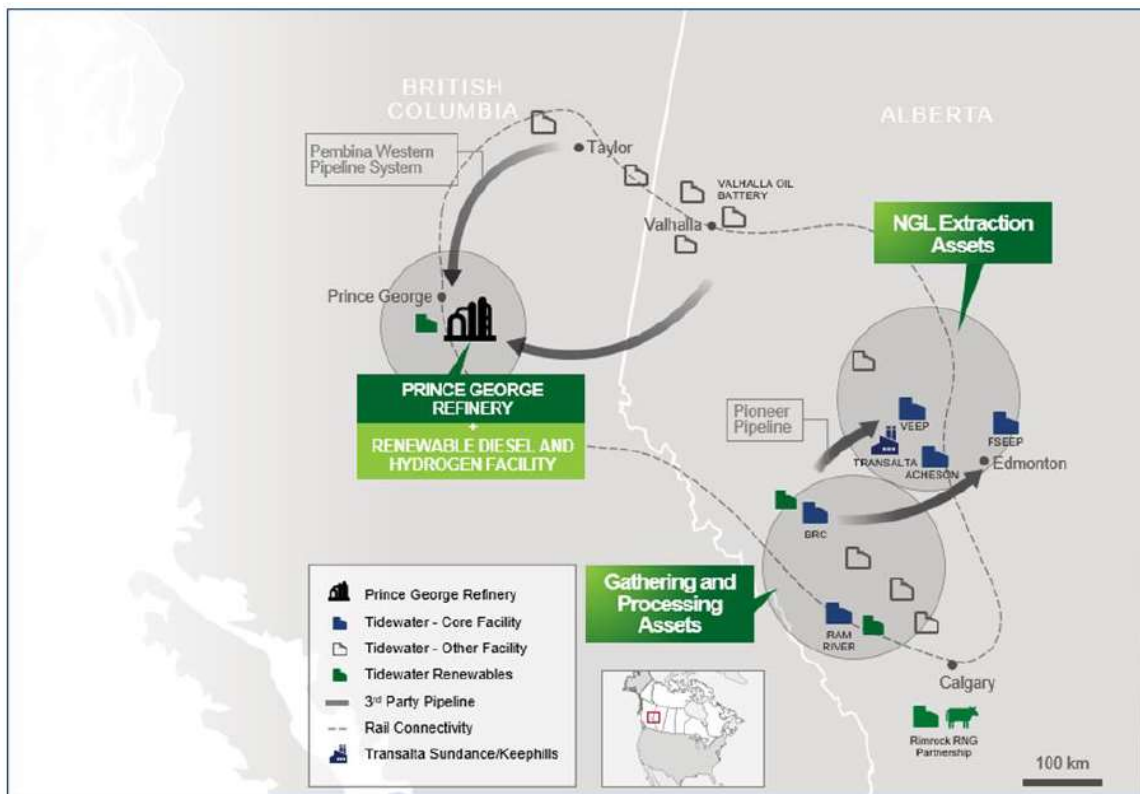
**Report**

## INTRODUCTION

1. Tidewater Midstream and Infrastructure Ltd. ("**Tidewater**") is committed to ensuring that its supply chains are free of forced labour and child labour. This report is filed by Tidewater for the financial year ending December 31, 2023, in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").
2. The terms "we", "our" and "us" as used in this document refer to Tidewater.

## STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

3. Tidewater is a public corporation incorporated under the *Business Corporations Act* (Alberta) (the "**ABCA**") on February 4, 2015. Tidewater is a reporting issuer in each Canadian province.
4. Tidewater is a downstream, midstream, and infrastructure company that deals in natural gas, natural gas liquids, crude oil, refined products, and renewables fuels. Tidewater sells crude, refined product, natural gas, NGLs and renewable products and services to customers across North America.
5. Our operations extend through the Western Canadian Sedimentary Basin ("**WCSB**") including the Deep Basin, the Montney and Central Alberta areas as well as Prince George, British Columbia. All sales and marketing of Tidewater products are done from our head office in Calgary, Alberta. The following map shows the locations of Tidewater's principal operations, all of which are in Canada.



6. Tidewater has the following business lines:

- *Downstream* – Tidewater purchases light crude oil and renewable feedstocks and produces refined products including low sulfur diesel, renewable diesel and gasoline.
- *Midstream* – Tidewater provides fee-based processing services for natural gas, NGL extraction capability as well as toll-based natural gas storage services.
- *Marketing and Other* – Tidewater purchases, transports, sells, stores and blends both NGLs and crude oil throughout North America. Additionally, Tidewater engages in some limited upstream oil and gas production in Western Canada.

7. In 2023, Tidewater employed approximately 392 permanent employees and 60 contractors and consultants in its operations. Tidewater employees have collective bargaining agreements with the company. Approximately 43 employees employed by Tidewater at the Brazeau River Complex (located in the West Pembina region in central Alberta) are represented by Unifor Local 431. Additionally, approximately 94 employees employed by Tidewater at the 12.0 Mbb/d light oil refinery located in Prince George, British Columbia, are represented by Unifor Local 1997.

8. Most of our suppliers are located in Canada and the United States and consist of raw material and equipment suppliers, including, but not limited to, equipment and materials such as gaskets, pumps, mechanical appliances and machinery, steam turbines, electrical apparatuses, cyclic and acyclic hydrocarbons, and petroleum oils other than crude. We have approximately 440 suppliers, primarily located in Canada and the United States most of whom have long-term contracts with Tidewater. Also to support the construction of Tidewater Renewables Ltd.'s Renewable Diesel facility, Tidewater also imports materials and equipment from Europe.

## **POLICIES AND DUE DILIGENCE PROCESSES**

### **Our Operations**

9. Tidewater embeds responsible business conduct into its policies and management systems. We comply with the employment laws of Alberta and British Columbia in our facilities. We have policies intended to foster safe and respectful workplaces, including policies against harassment, bullying, sexual harassment, and violence. New employees are to complete online reviews and acknowledgment of Tidewater's policies against harassment, bullying, sexual harassment, and violence. All employees are also required to complete review and acknowledgment of these policies annually.

10. All Tidewater employees, officers, and directors are expected to adhere to our Code of Business Conduct and Ethics (the "**Code**"). The Code includes expectations regarding responsible business conduct and the obligation to act ethically and with integrity. The Code is accessible online on our website by any employees or external stakeholders. New employees are to

complete online reviews and acknowledgment of the Code. All employees are also required to complete review and acknowledgment of the Code annually.

11. Tidewater maintains internal accountability standards and procedures for employees or contractors who to meet company standards, including disciplinary action up to and including termination. Employees are encouraged to immediately provide a written or verbal report to their manager or supervisor, or People Services, if they suspect of any party acting in violation with Tidewater's policies. For most workplace issues, we have a grievance mechanism in accordance with our employees' collective bargaining agreement for our unionized employees and for all employees we have a whistleblower hotline to call should they encounter dangerous, improper, or unlawful acts.
12. Tidewater is committed to remediating any workplace or labour-related issues where appropriate, especially in arbitrations under our collective bargaining agreements with employees. Internally, our grievance process seeks to address concerns raised by employees, with decisions communicated to employees through the union.

### **Our Suppliers**

13. Specific agreements with suppliers will have appropriate contractual provisions to require the supplier and anyone else involved to plan and conduct work for Tidewater in a manner that safeguards the lives of people, property and the environment.
14. The general terms and conditions that apply to our purchase orders with suppliers specify that the supplier will only provide goods and services in compliance with all applicable laws. While Tidewater's standard agreements have not historically contained express clauses addressing forced labour or child labour as defined in the *Supply Chains Act*, suppliers represent and warrant that they will remain fully compliant with all applicable trade and customs laws, regulations, instructions, and policies. Moreover, any services provided at a customer site must be provided in a manner that maintains the healthy and safe working conditions at the site.
15. Typically, any material violation of an application law that is not remedied within forty-eight hours of receipt of written notice detailing the violation is a material breach of the agreement and triggers termination rights.

### **RISK OF FORCED LABOUR OR CHILD LABOUR**

16. Tidewater assesses the risk of forced labour or child labour in its own operations as low because of the workplace policies and procedures that Tidewater maintains in accordance with applicable local labour and employment laws and human rights standards. While we use employment agencies in limited capacities (e.g., to recruit support workers who assist with the cleaning of our facilities), these agencies must follow provincial employment laws under their contractual obligations with Tidewater.
17. Tidewater has not identified any specific risks related to forced and child labour in its operations or supply chains. Tidewater relies on the cooperation of all of its suppliers and expects them to follow any applicable laws, as set out in their respective purchase agreements.

## **TRAINING**

18. In 2023, senior management and certain employees received training on respect in the workplace and diversity and inclusion. Tidewater employees are required to have read and understood the Code and Respectful Workplace Policy and complete annual acknowledgements. In addition, all employees are to complete online Respect in the Workplace Training which requires recertification every 3 years.

## **ASSESSMENT OF EFFECTIVENESS AND REMEDIATION**

19. Tidewater is committed to further strengthening our policies and procedures, assessing risks more effectively, and taking targeted actions to address any issues identified. We did not identify any incidents of forced labour or child labour in our activities or supply chain during 2023, and therefore undertook no remediation measures.

20. We continue to monitor the implementation of our current measures and intend to assess their effectiveness in due course.

## **APPROVAL AND ATTESTATION**

21. 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 listed below. 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.

"Signed"

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Thomas P. Dea,  
Chairman of the Board of Directors,  
May 30, 2024

I have the authority to bind Tidewater Midstream and Infrastructure Ltd.

*Advisory Regarding Forward-Looking Statements*

Certain statements contained in this report constitute forward-looking statements and forward-looking information (collectively referred to herein as, “forward-looking statements”) within the meaning of applicable Canadian securities laws. Such forward-looking statements relate to future events, conditions or future financial performance of Tidewater based on future economic conditions and courses of action. All statements other than statements of historical fact may be forward-looking statements. Such forward-looking statements are often, but not always, identified by the use of any words such as “seek”, “anticipate”, “budget”, “plan”, “continue”, “forecast”, “estimate”, “expect”, “may”, “will”, “project”, “predict”, “potential”, “targeting”, “intend”, “could”, “might”, “should”, “believe”, “will likely result”, “are expected to”, “will continue”, “is anticipated”, “believes”, “estimated”, “intends”, “plans”, “projection”, “outlook” and similar expressions. These statements involve known and unknown risks, assumptions, uncertainties and other factors that may cause actual results or events to differ materially from those anticipated in such forward-looking statements. Tidewater believes the expectations reflected in those forward-looking statements are reasonable, but no assurance can be given that these expectations will prove to be correct and such forward-looking statements included in this report should not be unduly relied upon.

In particular, this report contains forward-looking statements pertaining to but not limited to the following:

- Tidewater’s commitment to ensuring that its supply chains are free of forced labour and child labor;
- employees reviewing and adhering to the Code and other corporate policies;
- Tidewater’s commitment to remediating any workplace or labour-related issues as appropriate;
- Tidewater’s inclusion of desired contractual provisions;
- the strengthening of policies and procedures;
- assessing risks and taking targeted actions to address identified issues; and
- monitoring current measures and assessing their effectiveness.

Although the forward-looking statements contained in this report are based upon assumptions which management of Tidewater believes to be reasonable, Tidewater cannot assure investors that actual results will be consistent with these forward-looking statements. With respect to forward-looking statements contained in this report, Tidewater has made assumptions regarding, but not limited to:

- continuing government support for existing policy initiatives;
- Tidewater’s ability to include desired contractual provisions in legal agreements with suppliers and other contractual parties; and
- Tidewater’s ability to monitor and assess the effectiveness of current measures.

Tidewater’s actual results could differ materially from those anticipated in the forward-looking statements, as a result of numerous known and unknown risks and uncertainties and other factors including but not limited to:

- risks relating to the supply chains of third parties;
- employees failing to adhere to existing policies; and
- failing to effectively address identified issues.

Readers are cautioned that the foregoing lists are not exhaustive. Additional information on these and other factors which could affect Tidewater's operations or financial results are included in Tidewater's most recent annual information form and in other documents on file with the Canadian securities regulatory authorities. Readers can access such documents under Tidewater's System for Electronic Document Analysis and Retrieval ("SEDAR+") profile at [www.sedarplus.ca](http://www.sedarplus.ca).

Tidewater does not undertake any obligation to update publicly or to revise any of the included forward-looking statements, whether as a result of new information, future events or otherwise, other than as required by applicable securities law. All forward-looking statements contained in this report are expressly qualified by this cautionary statement.