



2025 Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Introduction

This report has been prepared by **Sirius Instrumentation and Controls, Inc.** to comply with the requirements of *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act* for financial year ending April 30, 2025.

Structure, activities, and supply chain

Sirius Instrumentation and Controls Inc. (Sirius Controls), incorporated in April 2003 in Alberta, Canada, is a designer and manufacturer of proprietary chemical injection pumping and monitoring systems. The company offers a comprehensive range of chemical injection systems comprised of pumping, monitoring, environmentally sustainable tank systems and solar products. Headquartered in Edmonton, Alberta, Sirius Controls focuses on innovative engineering and remained at the forefront of technology in both the chemical injection and solar industries. Its commitment to advancing sustainable solutions and maintaining high standards of quality is integral to its operations and supply chain.

Policies and due diligence processes

Sirius Controls is committed to ethical practices in its operations and supply chain, prioritizing the rights and safety of its workers. In 2025, Sirius Controls strengthened its commitment to ethical labour standards by introducing a Modern Slavery Policy and encouraged employee feedback through a Suggestion Box. The policy was shared with employees through a company-wide email and discussed in a weekly team meeting. The company recognizes the opportunities to improve its policies and due diligence processes. To address this, a formal vendor onboarding process was developed, and an annual policy review was implemented to ensure ongoing compliance with lawful and ethical standards.

Additionally, the company developed a Vendor Risk Matrix to categorize vendors based on country of origin and procurement value. A due diligence audit process was established, using a vendor questionnaire to assess and evaluate the risk of forced or child labour in vendor operations and supply chains.

Sirius Controls' senior management team continues to regularly review and update relevant policies, procedures, and practices during the Annual Management Review Meeting.



Forced labour and child labour risks

In alignment to the Act, Sirius Controls conducted a structured due diligence process to assess the risk of forced and child labour within its supply chain. As part of this process, a Vendor Risk Matrix was developed and implemented to categorize vendors based on their risk level. These vendors provide raw materials, components, finished goods, fixed assets, repairs & maintenance, logistics, professional services, and other services. Each vendor receives an overall risk score derived from the combined risk ratings of their spend level and location. These two factors are rated and combined to determine the overall risk level: low, medium, or high. The combined score determines the overall risk level.

To further support the risk assessment and compliance monitoring process, a standardized questionnaire was distributed to all active vendors. The company received a positive response from all the High and Medium Risk vendors. Vendors who did not respond, belong to Low-Risk category, have been temporarily designated as inactive and will remain so pending completion of the assessment.

Remediation measures and remediation of loss of income

During the reporting period, aside from implementing the Vendor Risk Matrix and assessment, Sirius Controls did not identify any instances of forced or child labour within its operations or supply chain. As a result, the company has not undertaken any direct remediation measures or any measures to remediate the loss of income.

Training

Sirius Controls provides on-the-job and recurring training to ensure employees are well-equipped to perform their roles effectively. As part of its ongoing commitment to ethical practices, the company offers training on prevention of forced and child labour. In 2025, this training is being delivered through multiple channels, including in-person sessions, email communications, and as part of the onboarding process for all new employees. These efforts aim to build awareness and ensure that all employees understand the responsibilities in upholding ethical labour standards.

Assessing Effectiveness

Throughout the past financial year, Sirius Controls maintained its commitment to ethical labour practices, ensuring integrity across its operations and supply chains. The company remains dedicated to continuously enhancing the effectiveness of its measures to prevent and address the risks of forced and child labour in the years ahead.

The entire organization, from employees and leadership to the Board is expected to act ethically and with integrity. The company also strives to engage vendors and clients who share its core values.



Approval and attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.


Thakur Sekhon
President & CEO
May 23, 2025

I have the authority to bind Sirius Instrumentation and Controls Inc.