

**ISCO Canada, Inc.**

**Modern Slavery Statement**

For the Period Ending December 31, 2024

## **Modern Slavery Statement**

This Modern Slavery Statement (the “Statement”) is prepared for ISCO Canada, Inc. (“ISCO Canada” or the “Company”) as a single reporting entity and made to comply with Canada’s Modern Slavery Act of 2023 (the “Act”) for the period ending December 31, 2024 (the “Reporting Period”). ISCO Canada acknowledges the seriousness of modern slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our operations, supply chain or any other part of our business. This Statement outlines the steps we are currently taking or plan to take in the future to assess and address modern slavery risks in our business and ensure compliance with our legal obligations.

### **Our Structure, Operations and Supply Chains**

ISCO Canada was established on January 28, 2014 and is a wholly-owned subsidiary of ISCO Industries, Inc., a company incorporated under the laws of the Commonwealth of Kentucky, United States of America (“ISCO”).

ISCO Canada is a value-added manufacturer and distributor that stocks and sells a wide variety of piping materials and provides customized piping solutions for various environmental, geothermal, golf, industrial, landfill, municipal, nuclear, waterworks and culvert-lining applications, such as High-Density Polyethylene (“HDPE”) piping fabrication, supply and installation, and the sale and/or rental of HDPE pipe fusion or welding equipment.

As of December 31, 2024, ISCO Canada operates from seven facilities throughout Canada and the U.S. state of Alaska, with its primary offices located in Edmonton, Alberta. It currently employs 65 people in Canada across the Provinces of AB, BC, MB, ON, QC and SK. Our workforce, from time to time, also includes a small number of individuals from outside Canada who arrive and operate on work visas for a limited duration.

ISCO Canada’s supply chain comprises primarily of manufacturers of HDPE pipe, pipe fittings and pipe fusion/welding equipment and related products and services. For the last 10 plus years, we have developed strong long-term relationships with our suppliers in order to ensure quality, consistency and reliability of supply.

During the 2024 calendar year, ISCO Canada engaged approximately 173 suppliers, with over 95% of our spend in Canada (70%) and the United States (25%), respectively. Certain of our products that are sourced either locally or in the United States originate from countries such as South Korea, Thailand, and China.

### **Policies and Due Diligence Processes**

In 2024, ISCO Canada took steps to further enhance our policies and guidelines, including making material updates to our Supplier Code of Conduct Policy (“Supplier Code”), particularly with respect to modern slavery and human trafficking. Our policies and guidelines increase the standards expected both of ourselves and our suppliers in mitigating the risk of forced and child labour throughout the supply chain.

During this Reporting Period, ISCO Canada undertook an analysis of its tier 1 suppliers. A supplier screening questionnaire was developed and prepared with input from multiple departments. Once finalized, this questionnaire was distributed, along with a copy of our updated Supplier Code, to ISCO Canada’s supply chain in order to assess risk. Additionally, ISCO Canada intends to implement screening of all our suppliers and customers against published governmental forced labour lists.

## **Risks of Modern Slavery in Operations and Supply Chains and Steps to Address**

Upon preliminary assessment, ISCO Canada believes the risk of our operations causing, contributing to or being linked to modern slavery is very low. All of ISCO Canada's workforce was recruited and employed directly by the Company's Human Resource personnel in accordance with all applicable federal and provincial legislation. Additionally, as stated above, the majority of ISCO Canada's procurement spend for this Reporting Period was in North America, where the risk of child, forced or involuntary labour in manufacturing activities is relatively small. In addition, North American suppliers are subject to compliance with laws that strictly prohibit modern slavery practices.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. To that end, we are committed to conducting thorough assessments and implementing policies and procedures to understand and mitigate these risks effectively, such as:

1. **Due Diligence Process:** As described above, ISCO Canada intends to continue to build on its due diligence process to identify potential areas of vulnerability to modern slavery and human trafficking. This process will include auditing responses received to our supplier questionnaire as well as evaluating various factors assessed by the Corruption Perceptions Index (CPI) that incorporates the Global Slavery Index), market sectors, types of labour, and supply chain complexity.
2. **Collaboration and Information Sharing:** To the extent possible, we intend to collaborate with industry peers, applicable civil society organizations, and other stakeholders to share information and best practices for identifying and addressing the risks of modern slavery and human trafficking. This collaboration will enable us to leverage collective knowledge and resources to enhance our risk assessment processes.
3. **Enhanced Contractual Requirements:** During this Reporting Period, ISCO Canada undertook to include in our terms and conditions of purchase requirements that suppliers strictly prohibit the use of modern slavery or human trafficking.
4. **Continuous Monitoring and Review:** We intend to continuously monitor and review our risk assessment processes to ensure they remain effective and relevant. This will include staying informed about emerging trends, regulatory changes, and industry developments related to modern slavery and human trafficking to adapt our approach accordingly.

By actively identifying and assessing the risks of modern slavery and human trafficking, we can better understand the complexities of these issues and take proactive steps to prevent their occurrence within our operations and supply chain.

## **Measures to Remediate Forced Labour, Child Labour and Loss of Income to Vulnerable Families**

In accordance with ISCO Canada's Supplier Code, ISCO Canada logs complaints as well as ethical, compliance and/or legal concerns via our ISCO Hotline. As of the date of this Statement, ISCO Canada is not aware of any (i) instance(s) of forced labour or child labour or (ii) loss of income to vulnerable families resulting from measures taken by the Company to eliminate the use of forced or child labour in our activities and supply chains.

## **Training and Consultation**

ISCO Canada operates through a centralized procurement and human resources system to minimize any risks of modern slavery or human trafficking. In 2024, ISCO Canada enhanced its efforts to provide

appropriate training on this subject to our employees. Due diligence was conducted on several vendors with a focus on content and gamification to make such content more engaging and motivating. The successful training module was implemented in the third quarter of 2024 and rolled out to our employees in November to great success. We remain committed to ensuring that appropriate Team Members are trained in corporate social responsibility and that such training highlights the risks of child labour, forced labour and human trafficking.

### **Measuring the Effectiveness**

ISCO Canada believes the success of our anti-modern slavery program depends on continuous improvement. To that end, we believe that we have made material improvements to our expectations with suppliers, improved the awareness of our own employees through training, and increased expectations on ourselves through our updated Supplier Code. However, we believe there is no end-point where we can stop our efforts to identify and mitigate risks. As such, ISCO Canada is committed to continuing its process of developing and then implementing measures to further identify and address modern slavery risks within its operations and supply chains.

### **Attestation**

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in this Statement for ISCO Canada, Inc. Based on my actual knowledge, and having exercised reasonable diligence, I attest that the information in the Statement is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Period listed above.

I have the authority to bind ISCO Canada, Inc.



\_\_\_\_\_  
Signature

Richard Butler

\_\_\_\_\_  
Print Name

Director and General Manager

\_\_\_\_\_  
Title

May 29th, 2025

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Date