
MODERN SLAVERY POLICY

Global

Date: 11-05-2024



INTRODUCTION

PHX Energy Services Corp. and its subsidiaries ("Phoenix", "we", "our" or the "Corporation") require the highest standards of professional and ethical conduct within the Corporation, including from our directors, officers, employees, and consultants (collectively referred to as "Personnel") and from our Suppliers (as defined in our Supplier Code of Conduct).

We are committed to maintain the highest standards of business and make a positive impact in the communities in which we work. We respect the fundamental human rights of the people we interact with and refuse to participate in activities that violate human rights. Our efforts to prevent modern slavery are published in our annual ESG report and set out in our annual Modern Slavery Report.

MODERN SLAVERY & OUR COMMITMENTS

Modern slavery is a general term that refers to situations in which a person is exploited by another for personal or commercial gain. This includes forced labor, child labor, bonded labor, debt bondage, domestic servitude, sex trafficking and human trafficking. Phoenix prohibits the use of modern slavery in any form, including in our supply chains. In compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, Phoenix compiles an annual report on due diligence efforts to identify modern slavery risks and prevent modern slavery from occurring in our supply chains. Phoenix expects that Suppliers will provide any information required for Phoenix to report.

WE EXPECT OUR PEOPLE TO:

- Monitor our Suppliers to ensure they adhere to our Supplier Code of Conduct and ensure the Director, Global Supply Chain and the Compliance Officer have been suitably informed;
- Monitor our Personnel to ensure they adhere to our Business Code of Conduct;
- Report any actual or suspected breaches of this Modern Slavery Policy via our Whistleblower line; and
- Follow all internal Phoenix policies and procedures that reference Modern Slavery requirements.

WE EXPECT OUR SUPPLIERS TO:

- Meet the requirements of our Supplier Code of Conduct;
- Act socially responsibly, including not using forced labor, child labor, bonded labor, debt bondage, domestic servitude, sex trafficking or human trafficking; and
- Develop and apply controls to prevent modern slavery in their supply chains.

WE WILL COMMUNICATE OUR EXPECTATIONS THROUGH:

- Annual training via our learning management system.
- Emails and surveys to external stakeholders.
- Updates provided in our annual ESG report.