## 1. Modern Slavery Act Report, Fiscal Year 2024

Blackline Safety Corp. ("Blackline Safety", the "Company", "we" or "our") has prepared the following report in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Modern Slavery Act"). This report covers Blackline Safety Corp which also falls under the scope of the U.K. Modern Slavery Act 2015. Although this report discusses our activities throughout the Blackline family of entities, it is only submitted on behalf of Blackline Safety Corp. As part of our ongoing compliance with the Modern Slavery Act, this report outlines the actions and practices we have undertaken across our organization and subsidiaries for the fiscal year spanning November 1, 2023 to October 31, 2024 (the "Reporting Period").

We remain strongly committed to identifying and addressing risks related to forced labour, child labour, and human trafficking in our operations and supply chains. These practices have no place in our business or in the broader industries we work within. As a global organization, Blackline Safety is focused on conducting business ethically and responsibly, and we continue to engage our stakeholders, including employees, suppliers, and customers—with transparency and integrity.

Forced labour and child labour are contrary to our corporate purpose, vision, and values. We expect everyone associated with our business, from our internal teams to our external partners and Board members, to uphold the highest ethical standards. Where concerns arise, we are committed to taking meaningful action to address them and continuously improve our approach to responsible business conduct.

# 2. Steps taken to help prevent and reduce the risk of forced labour or child labour

During the Reporting Period, Blackline Safety has taken the following steps to help prevent and reduce the risk that forced labour or child labour is used at any step of the operations of our business:

- Conducted our annual supplier compliance assessment to identify and evaluate potential risks related to forced labour or child labour within our supply chain.
- Formalized and improved our supplier compliance assessment template to strengthen our review process.
- Delivered mandatory training to employees within our procurement team whose responsibilities involve direct engagement with vendors, ensuring they are equipped to recognize and address risks associated with forced and child labour.

#### 3. Our structure, activities, and supply chain

#### Structure

Founded in 2004 and headquartered in Calgary, Alberta, Canada, Blackline Safety is a hardware-enabled software-as-a-service technology company that is focused on bringing connected worker safety solutions to the global marketplace. Blackline Safety develops, manufactures, and markets a suite of safety devices and cloud-connected services in its Calgary headquarters to help protect workers at their jobs.

Blackline Safety is a public company listed on the Toronto Stock Exchange (TSX: BLN) and is incorporated in accordance with the Alberta Business Corporations Act and domiciled in the province of Alberta, Canada. The Company's principal business office is Unit 100, 803 24 Avenue S.E., Calgary, Alberta, T2G 1P5 and the Company's registered office is Suite 2400, 525 8 Avenue S.W., Calgary, Alberta, T2P 1G1.

Blackline Safety Corp.'s wholly owned subsidiaries are Blackline Safety Europe Ltd., Wearable Technologies Limited, Blackline Safety Europe SAS, Blackline Safety Australia Pty. Ltd., Blackline Safety USA Corp., and Blackline Safety SPV Seller Corp. As of the end of the Reporting Period, Blackline Safety employed 562 individuals worldwide, with 424 of them based in Canada.

#### **Activities**

Blackline Safety's technology empowers businesses with real-time safety insights to manage emergency responses and evacuations, proactively manage gas detection compliance and increase operational efficiency. When seconds count, Blackline Safety's connected technology enables a live monitoring team to deliver help directly to an employee in the shortest amount of time — to the worker's exact location.

The Company conducts operations from our facility in Calgary, Canada, where we manufacture and assemble our products, maintain our 24/7/365 Safety Operations Centre, as well as carry out research and development, sales and marketing, finance, administration, and other head office functions. The Company also has facilities in the United Kingdom, France, the United States and in the United Arab Emirates, providing support and administration and other services for the Company's European and international operations.

#### **Supply Chain**

Blackline Safety manufactures our products in-house, applying our skilled labour and leading manufacturing practices to build, test and ship products to our customers. Blackline Safety's investment in surface mount technology enables us to populate our own printed circuit board assemblies, increasing control over quality, reducing overall costs, and speeding time-to-market for new products. Blackline Safety's operations department provides production engineering services to ensure that our products can be manufactured at a high-level of quality and test coverage, technical production problems are corrected and averted, and alternative production methodologies can be introduced in order to remain competitive.

Blackline Safety actively sources goods for our products from a diverse range of suppliers. Key components, such as sensors and other electronic components are primarily sourced from the United Kingdom, Taiwan, China, and Japan. While many of our suppliers are headquartered in the United States, we recognize the varying levels of modern slavery risk across our supply chain and are committed to ongoing assessment and mitigation efforts.

Blackline Safety's production and manufacturing operations use a variety of assembly and test techniques in the production of our products, both in-house and outsourced to contract manufacturers. Methods include, but are not limited to, manual, fixtured and semi-automated component assembly using both mechanical and adhesive technologies, fabrication of machined and molded parts, in-house printed circuit board assembly, and component assembly and test within a cleanroom environment. Quality and specification inspection, using various gauge and material analysis equipment, is used in support of production. Services include design, analysis, reliability testing, repair, re-work, and upgrade support. The Company's manufacturing facility is ISO 9001:2015 and 14001:2015 certified.

#### 4. Policies and due diligence process in relation to forced labour and child labour

#### **Code of Conduct and Ethics**

Our <u>Code of Business Conduct and Ethics</u> (the "Code") sets forth a requirement for all service providers to Blackline Safety to refrain from taking unfair advantage of anyone through illegal conduct, manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice and must respect and obey the laws of the cities, provinces and countries in which we operate and avoid even the appearance of impropriety.

Our Code reflects our commitment to a culture of honesty, integrity, and accountability. It outlines the basic principles and policies with which all service providers are expected to comply. Service providers are our directors, officers, employees, consultants, contractors, contract operators, and any other person or company that provides goods and/or services to Blackline Safety. We regularly review and evaluate this policy to

assess its effectiveness to ensure compliance with applicable laws and international standards. Annually, we require reaffirmation from our employees that they have read and comply with the Code, which helps us meet our business practice standards and comply with applicable laws and regulations.

Our independent whistleblower reporting tool is available to report concerns anonymously regarding forced labour or child labour in violation of Blackline Safety's employee handbook and corporate policies, including suspected instances of illegal or questionable accounting, internal control, auditing, or people matters. When issues are reported, we investigate, address, and respond, as necessary. We ensure that the appropriate protections are in place for those who report misconduct and are committed to investigating and addressing all complaints reported.

#### **Quality policy**

We have a quality policy that outlines our commitment to continuously improve our quality management activities. We are committed to complying with all applicable statutory laws and regulations and establishing high quality standards for our customers and from our suppliers. Our manufacturing facility is ISO 9001:2015 and ISO 14001:2015 certified, of which the ISO 9001:2015 certification procedure contains stipulations regarding our efforts to prevent the risk of modern slavery or human trafficking, including forced labour or child labour in our manufacturing process.

### Sustainability reporting

Blackline Safety is fully committed to respecting human rights and upholding high ethical standards across all our operations and we do not tolerate modern slavery or human trafficking in any form. Oversight of our policies, governance framework, and sustainability, including policies relating to forced labour or child labour is interlinked with certain of our sustainability initiatives.

Strong corporate governance is fundamental to protecting the long-term interest of shareholders. Our governance structure includes executive leadership and our Board of Directors, providing a robust framework for accountability and effective oversight of our business.

The Board of Directors has established standing committees to support its oversight responsibilities. Our Governance & Nominating Committee is responsible for overseeing our corporate strategy, policies and internal controls pertaining to environmental and social matters. Our Audit Committee oversees matters regarding financial reporting and identifies and reviews the principal business and financial risks, including potential future sustainability-related disclosures in our public company filing requirements. There is also an internal sustainability-focused cross-functional team with a focus on progressing the Company's sustainability goals.

Blackline Safety reports annually on its sustainability goals and progress. Our 2024 Sustainability Report can be found on our website at: https://investors.blacklinesafety.com/sustainability.

# 5. Assessing and managing the risk of forced labour or child labour being used in our supply chain

During the Reporting Period, we conducted an assessment to identify potential risks of forced labour or child labour within our business and supply chain. Our broader supply chain is varied and complex; as a result, we typically engage only with primary vendors and assess the risk of forced labour or child labour within their end-to-end supply chain, including contractors and sub-contractors. We recycle critical minerals used in our production processes which helps to reduce our reliance on external suppliers, particularly for high-risk materials, and contributes to the mitigation of modern slavery risks.

We require all our approved vendors (suppliers providing ATEX/IECEx/UKSI certified product and/or supplies of raw stock or electronic components) to maintain a quality management system that complies with ISO 9001: 2015, UL, ATEX QAN, IECEx QAR, or an equivalent standard. We expect our vendors to uphold this requirement throughout their supply chains. We monitor compliance through our purchasing procedures, which include a new vendor screening scorecard and an annual vendor compliance assessment. In some instances, after a review of the supplier, we have "grandfathered" certain suppliers who may not have a formal quality system in place.

We engage proactively with our suppliers to assess their performance and encourage continuous improvement and accountability of any issues identified. This process includes providing feedback to vendors and collaborating with them to address the issues identified, if any, or explore vendor diversification to strengthen the resilience of our supply chain.

We formalized and enhanced our annual supplier compliance assessment template to better evaluate any changes in policies, compliance requirements, or risks, particularly those related to modern slavery and human trafficking with our current suppliers. The assessment is reviewed annually to ensure that the scorecard criteria remain aligned with applicable laws, regulations, and evolving considerations affecting supply chain.

We focused our efforts on the suppliers that represent the majority of our procurement activity. Specifically, during the Reporting Period, we verified vendors that accounted for over 90% of our total production spend. This production spend-based approach enabled us to maximize the impact of our compliance efforts by concentrating on vendors with the most significant business volume and highest exposure within our supply chain, helping us to uphold alignment with our standards regarding modern slavery.

We obtain confirmation from each key supplier, as part of our annual vendor compliance assessment, that it adheres to our Code, as well as all applicable regulations and laws. Included in this confirmation, when a vendor supplies its products from its own supply chain, we require confirmation that forced labour and child labour is not present in any part of its supply chain. This allows us to address the most at risk parts of our supply chain for critical materials. We obtain this confirmation as part of our new vendor screening process and suppliers are reassessed annually as part of our annual vendor compliance assessment. Based on the annual assessment performed, we are satisfied that the answers address the risk of forced or child labour in our supply chain. As a result, direct on-site audits and inspections by Blackline Safety personnel or third parties have not been deemed necessary, however we may visit certain vendors.

We also conduct an internal assessment to identify the risk within our business of forced labour or child labour. We require mandatory background checks on all new employees and contractors globally. We also provide various avenues that allow any employee to voluntarily report any instances of unfair worker rights, including an independent whistleblower reporting tool, anonymous annual employee survey, and an annual performance review. We also conduct annual training for employees within our procurement team whose responsibilities involve direct engagement with vendors, ensuring they are equipped to recognize and address risks associated with forced and child labour.

### 6. Remediation of any forced labour or child labour

We have not identified instances of forced labour or child labour in our business and the supply chains that support our operations.

# 7. Remediation of the loss of income and measures taken to eliminate the use of forced labour and child labour

Blackline Safety did not identify the existence of forced labour or child labour in our business and the supply chains that support our operations and as such, no remediation measures have been required, including those related to the loss of income for vulnerable individuals or families.

### 8. Training provided to employees on forced labour and child labour

During the Reporting Period, we completed mandatory forced labour and child labour training for all employees in our procurement team whose roles require direct interaction with vendors.

#### 9. Assessing the effectiveness of our actions

We currently conduct an annual self-assessment vendor screening process to identify suppliers that may pose a risk of violating our Code. Assessing the effectiveness of managing the risk of forced labour and child labour within our supply chain is a shared responsibility of the Board of Directors and Executive Team. The Board of Directors and

Executive Team are responsible for assessing and understanding the Company's principal risks related to forced labour and child labour and ensuring the appropriate checks and balances are implemented. There is also annual review of the Code and review of the supplier compliance assessment template, as required, to ensure compliance with applicable laws and international standards. Annual training is carried out for staff whose responsibilities involve direct engagement with vendors.

During the Reporting Period, there were no instances of forced labour or child labour identified among our suppliers through our annual supplier monitoring procedures.

We do not engage with any suppliers that tolerate forced labour or child labour in their supply chain or operations.

## **Approval**

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* by the Board of Directors of Blackline Safety Corp. and its wholly owned subsidiaries.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Blackline Safety Corp. and its subsidiaries. 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 Modern Slavery Act, for the Reporting Period listed above.

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**Cody Slater** 

Chief Executive Officer and Chair, Blackline Safety Corp.

I have the authority to bind Blackline Safety Corp.

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Director and Chair of the Governance and Nominating Committee of the Board of Directors, Blackline Safety Corp.

I have the authority to bind Blackline Safety Corp.

May 31, 2025