



**PLAINS**

**FIGHTING AGAINST  
FORCED LABOUR  
& CHILD LABOUR IN  
SUPPLY CHAINS ACT**

**2023 ANNUAL REPORT**

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## INTRODUCTION

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Plains Midstream Canada ULC (“PMC”) is committed to eliminating acts of forced labour and child labour within our business and from within our supply chains. Pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), PMC is considered an “entity”. As such, PMC has prepared an annual report for the 2023 fiscal year (January 1 – December 31) highlighting the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada; in accordance with section 11 (1) of the Act, PMC has a place of business, conducts business, and has assets in Canada. Furthermore, PMC has at least \$20 million in assets, has generated at least \$40 million in revenue and employs an average of at least 250 employees. PMC sells and/or distributes crude oil, natural gas and natural gas liquids in North America and imports into Canada goods produced outside Canada.

PMC established a cross-functional task force comprised of internal subject matter experts who reviewed the impacts of the Act on PMC, and established new practices to identify and reduce risks of forced and child labour in PMC’s supply chains. Such practices include:

- Creation of a Forced Labour Shipment Review form to determine the risk of forced or child labour for certain goods imported into Canada. Where a potential risk has been identified, stakeholders are engaged and provided information about the Act and future training requirements;
- Began creation of internal training program to be further developed in 2024;
- Created companywide awareness of the task force and requirements under the Act through internal PMC communications.
- Attended educational webinars and conferences to engage with subject matter experts on the Act; and
- Engaged with technology companies to review software available to help identify suppliers with forced labour or child labour risks.

## STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

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### Structure & Activities:

PMC operates and develops a diversified portfolio of complementary midstream energy assets engaged in the transportation, processing, storage and marketing of crude oil, natural gas and natural gas liquids. PMC links petroleum producers with refiners and other customers through its network of pipelines, trailers and leased railcars throughout North America. It also owns, operates or has joint

ventures in strategically located facilities, typically situated at or near its pipelines, for crude oil and natural gas liquids storage (including more than 32 active storage facilities and terminals for loading and unloading product from trucks and railcars), extraction of natural gas liquids from natural gas and fractionation of natural gas liquids into specification products.

PMC is headquartered in Calgary, Alberta. Its facilities are located in Alberta, Saskatchewan, Manitoba and Ontario, and it conducts business in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Quebec, Nova Scotia and New Brunswick.

PMC is an indirect, wholly owned subsidiary of Plains All American Pipeline, L.P. (“PAA”). PAA is a publicly traded master limited partnership headquartered in Houston, Texas. Its common units are traded on the NASDAQ exchange under the symbol “PAA.” References to “Plains” in this report applies to both PMC and PAA.

### **Supply Chains:**

PMC’s goal of safely delivering goods relies in part on our relationship with contractors and suppliers, including pipe, valve, and fitting manufacturers and distributors, manufacturers of engineered and skid-mounted equipment, construction companies, technology providers, and engineering firms. Our suppliers source components from the United States, Canada, Mexico, Japan, India, the European Union, China, Taiwan, and the Republic of Korea.

## **POLICIES AND DUE DILIGENCE**

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PMC strongly opposes the use of forced labour and child labour.

Plains’ [Code of Business Conduct](#) sets forth the Core Values that govern how we conduct business and engage in our business relationships with customers and other stakeholders, including suppliers, fellow employees, lenders, investors, governmental agencies and the communities in which we do business. Our Code includes information on our confidential third-party hotline service. The hotline may be used to report violations of the Code including any illegal or unethical behavior, or violations of Company policies.

Plains’ [Human Rights Policy](#) outlines our commitment to maintaining a culture that respects and supports internationally recognized human rights and aligns with the principles set forth in the United Nations Universal Declaration of Human Rights. The policy states our position on forced labour or child labour, which includes our adherence to minimum age provisions of applicable laws and that we employ only individuals of lawful age.

PMC expects our contractors and suppliers to adhere to Plains’ [Code of Business Conduct for Contractors and Suppliers](#), which provides that our contractors and suppliers should oppose forced labour and child labour.

PMC's due diligence approach includes embedding responsible business conduct into policies and management system, PMC expects suppliers to follow all applicable laws and regulations.

## **RISK ASSESSMENT**

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From our initial risk assessment, PMC identified that any risk of potential forced or child labour would exist in administrative and support sectors where we purchase technology products, such as laptops, monitors, and electronics, or promotional merchandise from suppliers. Our risk assessment is ongoing; however, PMC has not identified any forced labour or child labour in our primary business activities or our general supply chain.

## **REMEDIATION MEASURES**

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In 2023, PMC did not identify any forced or child labour in our activities and supply chains; accordingly, no remediation measures were required.

## **MEASURES TO REMEDIATE LOSS OF INCOME**

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In 2023, PMC did not identify any forced or child labour in our primary business activities and supply chains; accordingly, no measures to remediate loss of income were required.

## **TRAINING**

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Employees on PMC's cross-functional task force have attended conferences, webinars, met with peers, subject matter experts, and service providers to ensure Plains is informed and educated on the Act and its requirements.

In 2023, PMC began to develop employee training covering areas related to the Act. This training includes awareness of labour rights, forced labour or child labour practices associated with increased worker vulnerability; forced labour or child labour risk indicators that may occur in our industry or supply chains; and warning signs, including role-specific information on how employees can help identify and manage the risks of forced labour or child labour. This training will be completed in 2024 and assigned to designated employees.

PMC provided awareness of the Act to all employees through internal communications.

## ASSESSING EFFECTIVENESS

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In 2023, PMC did not identify any forced labour and child labour in our primary business or supply chains. Accordingly, no actions to assess our effectiveness were required.

## CONCLUSION

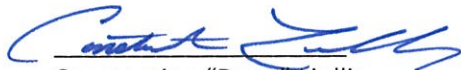
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PMC is committed to the identification and reporting of any risks of forced labour and child labour within our business or within our supply chains. PMC will continue to take steps to prevent and reduce the risk of forced labour or child labour being used at any step of the production of goods in Canada or elsewhere by PMC or of goods imported into Canada by PMC.

## ATTESTATION

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The report for Plains Midstream Canada ULC prepared for the 2023 financial year in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act")* has been approved by the board of directors of Plains Midstream Canada ULC on April 12, 2024. 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 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 above. For clarity, I have provided the attestation above in my capacity as a director and officer of Plains Midstream Canada ULC and not in my personal capacity.



Constantine "Dean" Liollo  
President

April 12, 2024

*I have the authority to bind Plains Midstream Canada ULC.*