

# Fighting Against Forced Labour and Child Labour in Supply Chains Act 2025 Annual Report

## 1. Introduction

This report is produced by DEW Engineering and Development ULC ("**DEW**", "**we**", "**us**", or "**our**") for the financial year ended December 31, 2025 (the "**Reporting Period**"). It describes the steps DEW has taken to prevent and reduce the risk that forced labour or child labour is used at any stage of (i) the production of goods in Canada or elsewhere, or (ii) goods imported into Canada by DEW. This report has been prepared in accordance with the ***Fighting Against Forced Labour and Child Labour in Supply Chains Act*** (the "**Act**").

## 2. Steps to prevent and reduce risks of forced labour and child labour

At DEW, how we act with our customers, our employees, and the broader community is guided by the following values:

- **Dignity** – We treat others as we would want to be treated;
- **Integrity** – We do what we say, and we say what we mean;
- **Customer Focus** – We create outstanding value for our customers; and
- **Teamwork** – We work together to make our company the best.

Respect for human rights is a fundamental corporate responsibility that informs our activities, and we expect our business partners to share this commitment.

During the Reporting Period, DEW took the following steps to prevent and reduce the risk of forced labour and child labour in our business and supply chains:

- Prepared new and updated training materials on the Act and delivered that training to employees;
- Updated our Supplier Assessment questionnaire to include questions about suppliers' commitment to human rights principles and the prohibition of forced labour and child labour in their own operations and supply chains; and
- Examined potential third-party tools that may assist in assessing supply chain risks.

These actions reflect DEW's commitment to combating forced labour and child labour in our supply chains, and our expectation that suppliers and business partners will uphold the same standards.

Further details regarding these actions are provided in this report.

### **3. Structure, activities, and supply chains**

DEW is incorporated under the laws of the Province of British Columbia and is headquartered in Ottawa, Ontario. With facilities in Ottawa, Ontario and Miramichi, New Brunswick, DEW has over 45 years of experience designing, testing, manufacturing, and delivering a broad range of armour and defence equipment.

DEW's supply chain consists primarily of North American and European Union companies that provide raw and processed materials, sub-assemblies, consumable items, and production machinery required to manufacture armour and defence equipment.

### **4. Policies and Due Diligence processes**

#### **4.1 DEW's Employee Code of Conduct**

In keeping with our values, DEW is committed to providing a work environment in which high standards of ethical conduct are recognized, understood, and practiced. DEW has established an Employee Code of Conduct (the "Employee Code") and works to ensure that every employee understands and complies with its requirements. We support this through training and by providing safe, confidential resources for employees to seek advice and report concerns. The Employee Code applies to all employees and management.

The Employee Code prohibits transactions or contracts involving services or supplies that are connected to child labour, forced labour or human trafficking in any form. Employees are expected to report any suspected violations.

#### **4.2 DEW's Supplier Code of Conduct**

DEW's Supplier Code of Conduct (the "Supplier Code") sets out our expectations for suppliers on a range of matters, including legal compliance, conflicts of interest, anti-bribery and anti-corruption, health and safety, environmental responsibility, fair competition, and respect for workers' human rights.

DEW opposes all forms of child or forced labour and human trafficking. Our Supplier Code reinforces this commitment throughout our supply chain. Suppliers are expected to respect the fundamental human rights of workers and must:

- not use forced or involuntary labour of any kind (including prison labour, slave labour, debt bondage, or indentured labour), or participate in human trafficking;
- not employ workers under the age of 15, or under the minimum legal working age in the applicable country, whichever is higher;
- employ, promote, and compensate workers based on their ability to perform the work, without discrimination on any status protected by applicable law;
- respect the personal dignity, privacy, and rights of every individual, and not tolerate harassment or unacceptable treatment (including sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse);

- comply with all applicable laws governing working conditions, including maximum hours and overtime, and minimum wage and benefits; and
- comply with DEW's Supplier Code, as required under DEW's Purchase Order Terms and Conditions for Suppliers.

### **4.3 Employee Training**

In 2025, DEW provided updated training to targeted executive, management, and supervisory employees.

The training raises awareness of forced and child labour, DEW's obligations under the Act, and adherence to DEW's Purchase Order Terms and Conditions and Supplier Code of Conduct, which define minimum supplier standards for ethical and socially responsible business practices.

The training also reminds employees of their obligation to report concerns to management, either directly or through a confidential and anonymous service available 24/7 by phone or email.

## **5. Assessing and managing our risk**

DEW identifies supply chain risks primarily through (i) watch-list screening of suppliers to assess legal and ethical risks (for example, sanctions and adverse media screening), and (ii) consideration of supplier geography. Our supply chain is almost entirely comprised of suppliers located in jurisdictions that have enacted modern slavery legislation and that, according to the Global Slavery Index, have a relatively low prevalence of forced labour and child labour.

## **6. Remediation Measures**

To date, DEW has not received any reports of forced labour or child labour risks or incidents. Accordingly, no remediation measures have been required, including measures to remediate any loss of income arising from remediation actions.

## **7. Training**

The training described in Section 4.3 will be delivered annually beginning in 2026.

## **8. Assessing effectiveness**

DEW has measures in place to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains, however, we do not currently have a formal process to assess the effectiveness of those measures. We will continue to assess suspected incidents of non-compliance with our Supplier Code of Conduct and related policies. Through updates made to our supplier assessment questionnaire, we now collect information on supplier commitments to reduce forced labour and child labour and will conduct further analysis where supplier responses raise concerns. We examined some questionnaire based third-

party tools that are designed to assist in assessing supply chain risks. We expect more tools to be developed in this area, and we will continue to consider the potential for using such tools in managing our supply chain risks.

## **9. Approval and Attestation**

This report was approved by the Board of Directors of DEW Engineering and Development ULC pursuant to subparagraph 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11, I, the undersigned, attest that I have reviewed the information contained in this report for the entity identified above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year identified above.

I have authority to bind DEW Engineering and Development ULC.

*Ian Marsh*

Per: \_\_\_\_\_

Name: Ian Marsh

Title: President

Date: 20 May 2026