

# Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 Annual Report

## 1. Introduction

This Report is produced by DEW Engineering and Development ULC (hereinafter referred to as “**DEW**” or “**our**” or “**we**”) for the financial year ending December 31, 2024 (the “**Reporting Period**”) and sets out the steps DEW has 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 by DEW. This Report has been prepared by DEW pursuant to 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, the way we act with our customers, our employees and the global community is guided by the following values:

- **Dignity - In everything, we do to others what we would have them do to us;**
- **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.**

Dignity and respect for human rights is a fundamental corporate responsibility that impacts all our activities, and we expect all our business partners to share this value.

DEW took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains. We updated our training materials for employees on Ethical Business Conduct to include examples of human trafficking and child and forced labour to raise awareness about the issues that the Act is intended to combat. The training materials cover a variety of ethical and socially responsible business practices and provide employees with guidance on tools available to them for the confidential reporting of workplace issues or concerns relating to the conduct of our suppliers. In connection with our Supplier Code of Conduct, we undertook a review of our supplier assessment questionnaire.

These steps highlight DEW’s commitment to combat the use of child and forced labour in our supply chain and our expectation that DEW suppliers and business partners will do the same.

Details of the above actions are set out in this Report.

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

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

DEW's global supply chain consists almost entirely of North American and Western European product suppliers, providing ceramics, and other materials, components, items and systems 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 seeks to provide a work environment where high standards of ethical behavior are recognized, understood, and practiced. To accomplish this goal, DEW has established a Code of Conduct and strives to ensure that every employee is aware of, understands and lives up to our values and the requirements of the Code. We do this with training and by providing employees with safe and confidential resources for them to seek advice and to report concerns. The Employee Code applies to all employees and management.

The Employee Code includes a prohibition against transactions or contracts involving the provision of services or supplies related to or resulting from human trafficking in all its forms including forced labour and slavery. Employees are expected to report any suspected violations of this prohibition.

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

Our Supplier Code details our expectations of suppliers on a variety of matters including in respect of legal compliance, conflicts of interest, anti-bribery and corruption, health and safety, the environment, fair competition, and the human rights of workers.

DEW opposes any form of forced labour or human trafficking. Our Supplier Code of Conduct seeks to promulgate this commitment in our global supply chain. Suppliers are to respect the basic human rights of workers and must:

- not use forced or involuntary labor of any kind, such as prison labor, slave labor, debt bondage, indentured labor, or participate in human trafficking activities;
- not use or employ workers under the age of 15 or the minimum age for employment in the applicable country, whichever is greater;
- employ, promote, and compensate workers based on their ability to perform the work irrespective of gender, race, ethnicity, nationality, religion, age, disabilities, sexual orientation, gender identity, genetic information, pregnancy, marital status, political affiliation, union membership, social association, veteran status, or other status protected by applicable law or custom;

- respect the personal dignity, privacy, and rights of every individual and not tolerate any unacceptable treatment or harassment of individuals, such as harsh or inhumane treatment, sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse;
- follow all applicable laws for conditions of employment, including maximum hours & overtime and minimum wage & benefits; and
- Our Purchase Order Terms and Conditions for Suppliers specifically require that suppliers comply with our Supplier Code of Conduct.
- As a result of the review noted above, our supplier assessment questionnaire will be revised in 2025 to include questions on supplier policies related to prohibiting forced and child labour.

#### **4.3 Training on Ethical Business Conduct**

In 2024 we updated materials used to provide our employees with training on Ethical Business Conduct generally. These materials include a section on Illegal Employment and Forced Labour designed to make employees aware of DEW's obligations under the Act. The training materials also remind employees of our Purchase Order Terms and Conditions for Suppliers and our Supplier Code of Conduct, which are designed to make suppliers aware of the minimum standards DEW expects from suppliers to support our commitment to ethical and socially responsible business practices. Our training materials cover a broad range of ethical issues and provide employees with examples of the sorts of conduct that conflict with our company values and that are prohibited under the Act and other applicable laws. The materials also inform employees of their obligation to report concerns to management either directly or by phone or email through a confidential and anonymous service available 24/7.

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

DEW's methodology for identifying risks is most notably based on 1) the watch list screening we conduct on all suppliers to assess legal and ethical risks, and 2) the geographical location of the supplier. Our supply chain is almost entirely made up of suppliers located in jurisdictions that have enacted Modern Slavery laws and which, according to the Global Slavery Index have a relatively low prevalence of forced and child labour.

#### **6. Remediation Measures**

To date DEW has not received any reports regarding any risks or incident of forced or child labour. As such no measures have been required to remediate any incident of forced or child labour nor to remediate a loss of income arising from such measures.

#### **7. Training**

The updated training described above will be provided to targeted employees in the second half of DEW's 2025 fiscal year and on an annual basis starting in 2026.

## **8. Assessing effectiveness**

While DEW has measures in place to prevent and reduce the risk that forced, or child labour is used in our activities and supply chains we have not yet taken any actions to assess the effectiveness of those measures. We will continue to assess any suspected incidents of non-compliance with our Supplier Code of Conduct and our related policies. In 2025 we will update our supplier assessment questionnaire to include questions on supplier policies related to prohibiting forced and child labour. We will also consider methods to assess our effectiveness in ensuring that our business and supply chains remain free of forced and child labour.

## **9. Approval and Attestation**

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

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed 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 listed above.

I have the authority to bind DEW Engineering and Development ULC.

Per: "Ian Marsh"

Name: Ian Marsh

Title: President

Date: 22 May 2025