



**Forced Labour in Canadian
Supply Chains Report –
Dumas Contracting Ltd.**

May 31, 2024



About Us

Dumas Contracting Ltd. (“Dumas”) is a full-service underground mining contractor with offices in Toronto and Timmins, Ontario. We are a private corporation existing under the laws of the Province of Ontario. Our current projects are located in Ontario and Manitoba.

Dumas has two wholly owned subsidiaries in Mexico and the United States, with current active operations in Mexico. This report applies to the Canadian operations of Dumas, but considers there is some engagement with Mexico’s supply chain.



Core Competencies

Mine Development

Dumas' core services include full-scale mine development, we have undertaken significant ramp and lateral development work in some of the world's most challenging conditions. We are experts in both track and trackless development of any size, as well as exploration, development, and production drifts.

Shaft Sinking

Dumas is one of the Americas' leading shaft sinking contractors having undertaken numerous shaft sinking projects in North and Latin America (directly or through its foreign subsidiaries).

Raising

Dumas is a leading provider of conventional open raising methods and mechanized raise climbing. Our mechanized raise climbers are used in some of the deepest mines in North America and have successfully completed some of the most challenging raises on the continent.

Mine Infrastructure & Construction

Dumas provides safe, innovative and efficient approaches to the construction of mine infrastructure. Services include shaft infrastructure, shaft rehabilitation, portal construction, material handling systems, pumping and dewatering systems, ancillary buildings and essentially all underground infrastructure installations.

Engineering

Dumas has a multi-disciplined Engineering and Technical Services team that offers practical, innovative and reliable designs with the ability to oversee the entire mine infrastructure. Our knowledge and skills allow us to design, manage and construct all aspects of underground mine infrastructure.

Supply Chain

Dumas procures virtually all of the goods used in its business from large dealers in the Canadian and broader North American market. Additional information regarding the nature of the goods we purchase and the location of the suppliers from which they are purchased are summarized below. We seek to work with reputable distributors and suppliers with which we have relationships and where we are not currently aware of any instances of the use of forced labour or child labour. Overall, we consider our risk for forced and child labour within our supply chains and business activities to be low.

Regardless of this assessment, we continue to require the highest of standards from our suppliers by requiring them to adhere to our Supplier Code of Conduct. This obligation is included in our purchase order and supply agreement terms.

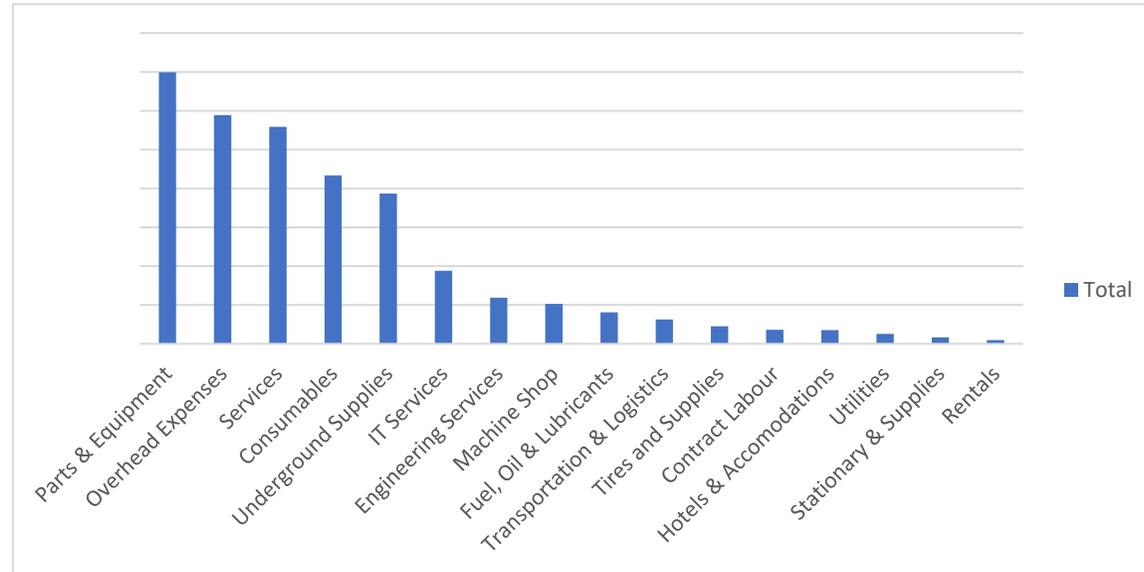
Supply Chain

Despite this low overall assessed risk, we have identified certain areas of relatively higher risk with our smaller supply partners, specifically in Mexico. We currently seek additional contractual protections in our agreements with these suppliers where we require representations and warranties that the provider is in compliance with all applicable laws, Dumas' policies and our client's policies.

We are also considering the development of a training program for all of our site employees who interact directly with these smaller suppliers to further mitigate this risk. The training is expected to focus on understanding the law prohibiting forced and child labour, to give them tools to identify risk areas, and to promote positive communication between all levels of management so that concerns can be properly disclosed and addressed.

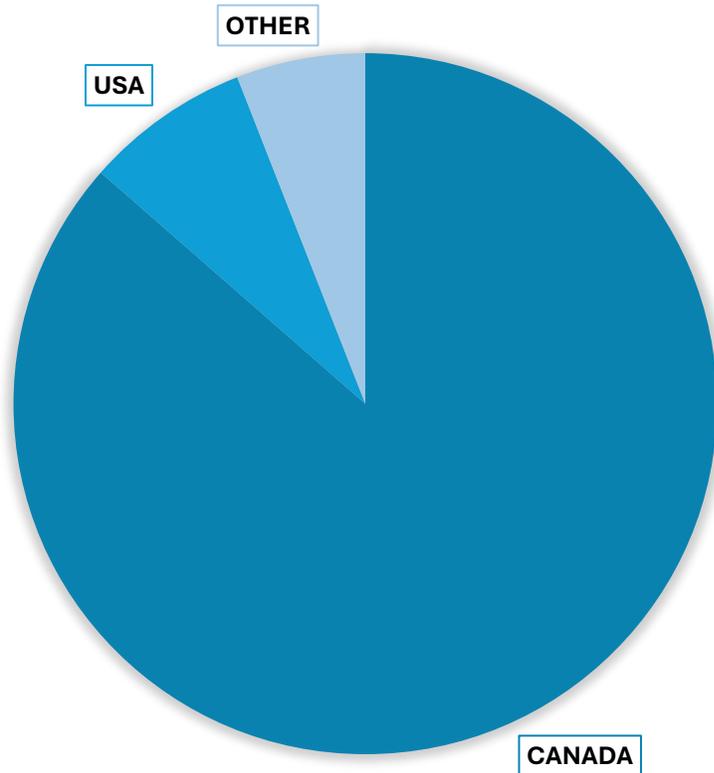
Supply Chain

Dumas' supply chain includes approximately 375 providers for various categories:



Supply Chain

TOTAL BY COUNTRY



Dumas recognizes that many of its suppliers will procure items from outside of Canada, which has the potential for increasing the risk of forced labour/child labour. That risk is mitigated by engaging with many large, globally established companies

Recruitment

In connection with the risk assessment described above, we also examined our own workforce and recruitment process to determine the risk of forced labour or child labour in our own business activities. Overall, we assessed our risk for forced and child labour within our workforce to be low, particularly for our operations in Canada.

However, we believe that there is a relatively higher risk when we recruit from countries other than Canada. We seek to mitigate this risk by using a reputable recruitment agency and we seek to follow Canadian government regulations for foreign workers. We supervise these individuals directly and ensure they are being treated fairly by the agency by confirming they have adequate housing, remain in possession of their passport, and are not restricted in their mobility within Canada or elsewhere.

Areas of Focus

- Review and revise all current policies in place. We intend to update a number of our existing corporate policies and procedures to more specifically address forced labour or child labour in our business and supply chains.
- Review and revise current language in Purchase Orders and Supply Agreements. We are updating our supplier agreements to specifically address matters relating to the use of forced labour or child labour by our suppliers.
- Develop specific training on our obligations. Although we do not currently have dedicated training on matters relating to forced labour or child labour, we are working to develop and implement a training program for employees.
- Further assessment of our supply chain partners and review reports to be filed by them in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.
- Promote our existing Whistleblower email and telephone number within our organization and on our website to provide a venue where suspicion of forced/child labour can be brought to our attention.
- We also intend to implement a program to monitor and periodically assess the effectiveness of our policies and procedures at mitigating the risk that forced labour or child labour are being used in our business or supply chains.

Summary & Approval

As of the date of this Report, Dumas is not aware of any instances of forced labour or child labour in its supply chain or workforce.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities 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.



Dumas Contracting Ltd.

Per: _____

Jeremy Okolisan, President

May 31, 2024

“I have the authority to bind the company.”