



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

May 31, 2025



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.

Actions Since Last Report

The following documents have been updated to make specific reference to compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), with the consequence of non-compliance being the potential cancelation of the contract:

- Code of Conduct & Business Ethics for Dumas Employees
- Template Subcontractor Agreement
- Supplier Code of Conduct
- Purchase Order Terms & Conditions

Last year, Dumas reviewed reports filed by material suppliers subject to the Act, to support Dumas’ monitoring of its own supply chain.

Supply Chain

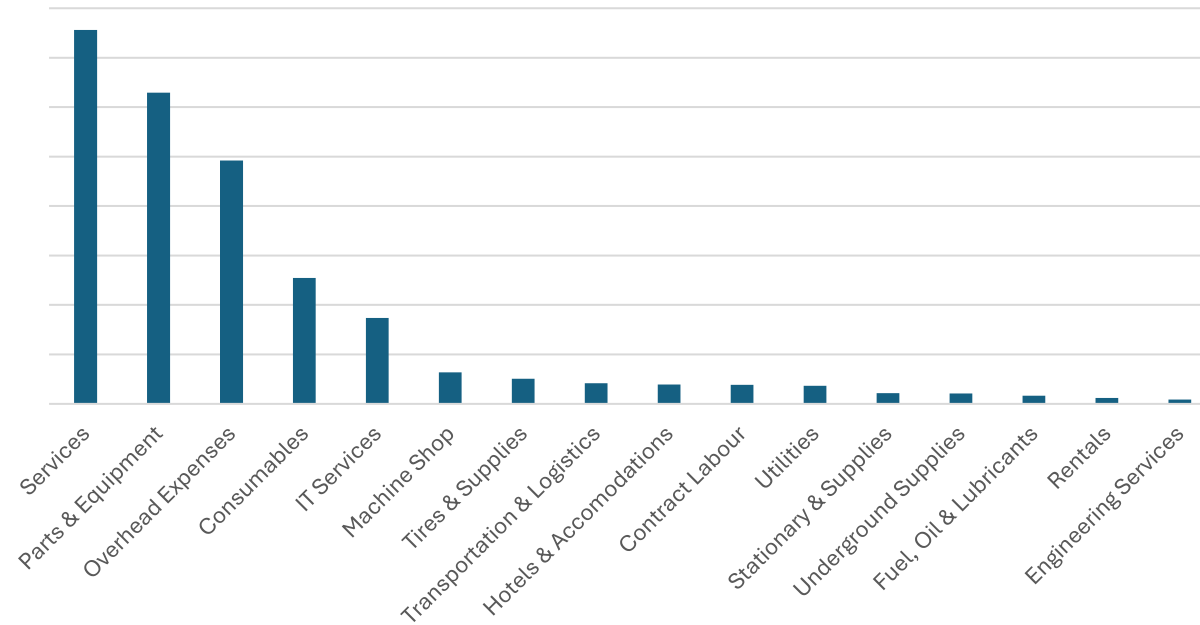
Dumas' risk of forced and child labour within our supply chain remains low.

Dumas procures virtually all of the goods used in its business from suppliers 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.

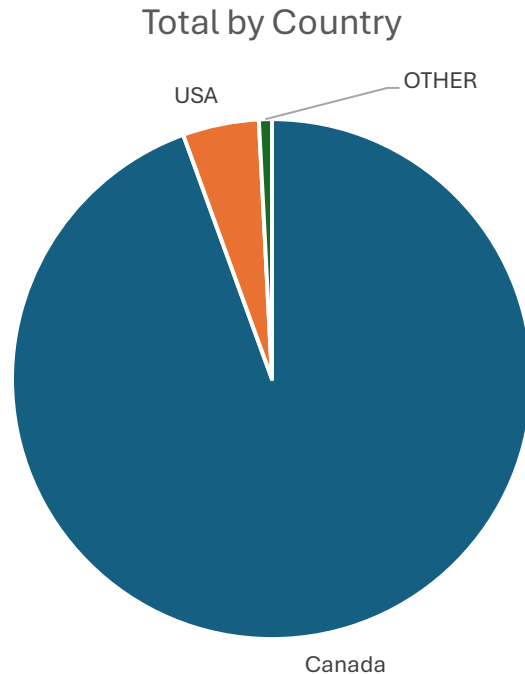
Regardless of this assessment, we continue to require the highest of standards from our suppliers by requiring them to adhere to our Supplier Code of Conduct. This obligation is included in our purchase order and supply agreement terms.

Supply Chain

Dumas procures goods and services from approximately 277 providers for various categories:



Supply Chain



The majority of our suppliers are located within Canada, with a limited number from the United States, Peru, Panama, Europe, and Mexico.

Dumas focuses principally on its tier 1 suppliers. It recognizes that it has more limited visibility into its risk of forced or child labour further down its supply chain, but believes that whatever risk may exist is mitigated by engaging with its many large, established companies.

Recruitment

Our risk of forced and child labour within our workforce remains low. Our recruitment practices ensure that all hired employees are eligible to work in Canada. The majority of our employees are skilled workers with compensation levels well above minimum wage.

An area that could lead to a higher risk of forced labour in our Canadian workforce relates to recruitment from countries other than Canada. Currently we do not have any such workers on our payroll.

If foreign recruitment is required, we do have procedures in place to mitigate any risk of forced or child labour by using a reputable recruitment agency, following Canadian government regulations for foreign workers, direct supervision to ensure fair treatment by the agency, confirmation of adequate housing, having possession of their passport, and no restrictions in their mobility within Canada or elsewhere.

Areas of Focus

- Develop specific training on the new sections in our Code of Conduct & Business Ethics that deal directly with our obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and applicable human rights legislation and other ethics topics. This would include induction training for new hires as well as annual refresher training, tailored to the position.
- Promote methods of reporting concerns of forced labour/child labour, including our existing Whistleblower email and telephone number.
- Develop mechanisms for remediation if violations are uncovered.
- Further assessment of our supply chain partners and development of due diligence procedures.

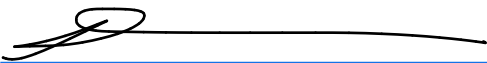
Summary & Approval

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.

This report was approved by the board of directors of Dumas pursuant to section 11(4)(a) of the Act. I am signing this attestation in my capacity as a director of Dumas and not in my personal capacity.



Dumas Contracting Ltd.

Per: 
STEPHEN DIXON (May 28, 2025 09:29 EDT)

Steve Dixon, Director

May 31, 2025

“I have the authority to bind the company.”