



## **DFI CORPORATION (“DFI”)**

### **REPORT FOR COMPLIANCE ON: FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT (the “Act”)**

#### **Report**

To meet the reporting obligation pursuant to the Act, DFI is publishing this report for the financial years ended December 31, 2023 and December 31, 2024.

DFI conducts its business operations in strict adherence to all relevant laws and regulations. This commitment extends to compliance with the provisions outlined in the Act.

#### **Structure, Activities, Supply Chain**

##### **Structure**

DFI is privately owned and operated and was established in March, 1969 with approximately 300 employees in Canada. DFI’s main headquarters are in Edmonton, Alberta, but also includes a branch network with locations throughout Western Canada. These locations effectively service customer projects primarily in Western Canada however has the capacity to support projects anywhere in Canada.

##### **Activities**

DFI’s core business model is to provide a one-stop steel piling source to serve customers that require steel piling foundations and ancillary services. DFI’s services encompass a wide range of activities that include: pre-drilling, pile design, pile manufacturing & supply, pile installation, surveying, pile testing, pile extraction and engineering services.

##### **Supply chain**

DFI’s supply chain consists of a variety of vendors that support all the activities listed above. These vendors are grouped into the following main categories: manufacturing inputs (i.e. mills that provide hot rolled coil), pipe wholesalers, parts (mainly for Canadian fleet equipment), third party contractors (welding, trucking, etc.), various marketing & legal consultants, etc. Most of these vendors (approximately 95% or greater) are sourced from within Canada.

Our supply chain includes suppliers and manufacturers of hot rolled coil, steel piling pipe and plate steel. Most of our supply chain operations are situated in Canada, with 100% of our hot rolled coil procured within North America (~99% within Canada from trusted vendors).

## **Policies & Due Diligence**

### **Policies**

1. Code of Ethics
2. Company HR policies
3. Regular reviews of vendors
4. Procurement policies and standards

### **Due Diligence**

DFI regularly reviews all suppliers to ensure that they meet our standards in terms of quality as well as the involvement of child labour and forced labour within their supply chain and operations. Although DFI recognizes a number of its vendors already comply with the act and have submitted their reports, it plans to implement more in depth reviews to further mitigate the risk of forced labour or child labour within our supply chain. DFI maintains strict code of ethics and professional conduct, including specific language banning all forms of modern slavery. DFI intends to implement a process of annual employee acknowledgements beginning in 2025. Procurement practices further require all vendors to comply with the act.

### **Risk assessment**

After evaluating both our operations and supply chain, we recognize the inherent risks associated with engaging third-party suppliers. However, given that the majority of our purchases occur within North America with long-standing trusted vendors, we assess the risk of forced labor or child labor to be relatively low. Outside of Canada, similar practices have been implemented and further improvements will be made in 2025.

### **Remediation forced labour & child labour & vulnerable family income loss**

DFI has not been required to initiate any remediation measures as no instances of forced labour or child labour have been identified in our supply chain to date.

### **Training**

DFI plans to implement various training opportunities and resources to ensure that we can effectively handle these issues should they arise. To date, DFI's focus has been on general awareness.

### **Effectiveness assessment**

DFI realizes that addressing the issue of forced labour and child labour in supply chains requires our continued attention. We are committed to continually improving our processes in order to mitigate the risk of forced labour or child labour across our operations and supply chain.

**Steps taken to prevent & reduce risk of forced labour or child labour**

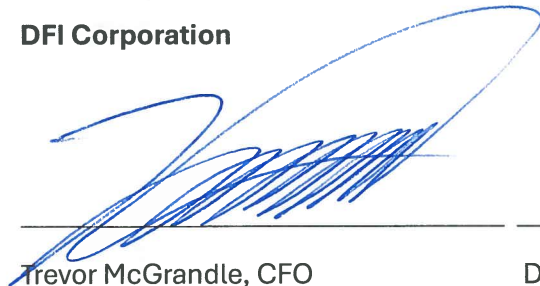
DFI intends to conduct regular reviews in order to identify potential risks of forced labour child labour within our supply chain and to further seek input from key employees. There will be a greater focus on procurement activities including suppliers and the origins of raw materials as we believe this is where the risk is the highest, despite non-Canadian sourced product representing an extremely low portion of our supply chain activities.

**Approval & attestation**

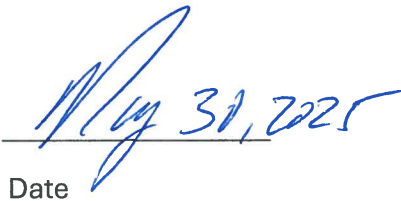
We hereby attest that the information provided in this report is accurate and complete to the best of our knowledge. We affirm that all efforts have been made to ensure the integrity and reliability of the data presented herein. Any limitations or exceptions to the accuracy of this report have been duly noted.

Furthermore, we acknowledge our responsibility to uphold the principles of transparency, accountability, and respect for human rights within our supply chain. We are committed to continuously improving our practices to prevent forced labor and child labor and to foster ethical and sustainable sourcing throughout our operations.

**DFI Corporation**



Trevor McGrandle, CFO



Date

I have the authority to bind DFI Corporation and this report applies to DFI Corporation and all entities considered reporting entities under the Act and any controlling subsidiaries, if they apply.