

## **Modern Slavery Report of D.F. Barnes Industrial Limited**

This is a report of D.F. Barnes Industrial Limited under the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (the “Act”).

Financial Reporting year: 2024

Business Number: 101373322

### **(a) Structure, Activities and Supply chains**

#### *Corporate Structure and Activities*

D.F. Barnes Industrial Limited (“DFBI”) is an “entity” as defined under section 2 of the *Act*. It is wholly owned by D.F. Barnes Services Limited, which is a holding company that owns DFBI and several other business enterprises in Atlantic Canada, in the marine and energy sectors. D.F. Barnes Services Limited is part of the JV Driver group of companies and is wholly owned and controlled by J.V. Driver Corporation Inc.

DFBI is an industrial construction and fabrication company offering project management services to site construction, constructability surveys, workforce planning and support & supply services. It is headquartered in St. John’s, Newfoundland with projects that expand throughout Newfoundland and other areas in Canada, including Thompson, Manitoba. DFBI employs approximately 40 staff employees and approximately 300-350 crew employees. As part of its business operations, DFBI will sometimes import material and equipment when required by specific projects, that cannot be sourced in Canada.

#### *Supply Chains and Actions Taken to Prevent and Reduce Risk of Forced Labour or Child Labour*

Most goods procured for DFBI projects are purchased directly by our clients and therefore, DFBI is not involved in importing any items into Canada. For those projects where DFBI does purchase goods for a project, DFBI most often purchases through Canadian distributors or manufacturers. However, at times specialty welding consumables, nuts & bolts and raw steel materials may be required by a customer request on a specific project. In situations where specialty goods are required, DFBI seeks to limit the importation of goods from within North America and Western Europe. By limiting the geographic scope in this manner, DFBI strives to minimize the risk that the goods it manufactures and/or incorporates into its projects are produced with forced and/or child labour.

In the rare occasion that DFBI must purchase or import goods that have been produced outside North America or Western Europe DFBI purchases through 3<sup>rd</sup> parties located within North America or Western Europe with an internally verified reputation for ethical business practices and adherence to regulatory standards.

### **(b) Policies and due diligence processes in relations to forced labour and child labour**

With the *Act* now in force, this is the first time that DFBI has had modern slavery compliance obligations. As a result, DFBI has not fully developed and implemented a policy and process framework to address

modern slavery considerations. Internal discussions started in 2023 about potential updates to policies and process to address modern slavery considerations more fully.

In the meantime, DFBI already has various due diligence processes in place that we expect will help minimize forced labour and child labour risks, including as follows:

- (i) DFBI operates a Quality Management System (QMS), which was implemented to define, measure, and control the various processes and activities employed in the provision of our services. The QMS is based upon the ISO 9001:2015 Quality management systems requirements. Pursuant to the ISO 9001:2015 standard, DFBI is required to establish criteria to assess suppliers. This is accomplished through the completion of Supplier Qualification questionnaires, which each new potential supplier is required to complete. The questionnaire includes various topics including Quality certificates, Quality manual, operational safety requirements, change management policies, worker injury information and safety training. The questionnaire, however, can be tailored and revised by DFBI to respond to identified and emerging risks, including modern slavery risks. DFBI reviews and evaluates the responses to ensure that customer, regulatory and statutory specifications are satisfied. Suppliers may be subject to periodic re-evaluation which is performed through supplier audits to assess processes, quality controls and adherence to standards. The QMS requires DFBI to uphold the highest standards in our supply chain, which will assist us in identifying risks associated with child or forced labour.
  - (ii) DFBI ensures that its contracts, especially any with foreign suppliers of goods, contain provisions which ensure compliance with applicable laws, including forced and/or child labour laws.
- (c) Parts of its business and supply chains that carry a risk of forced labour or child labour being used and steps taken to assess and manage the risk**

DFBI has not currently identified any specific risks in its business and supply chains that are associated with child labour or forced Labour. DFBI does, however, try to limit the geographic scope of where it obtains goods from, to North America and/or Western Europe. In addition, if goods must be sourced from outside North America or Western Europe, DFBI purchases through 3<sup>rd</sup> parties located within North America or Western Europe with an internally verified reputation for ethical business practices and adherence to regulatory standards.

**(d) Measures taken to remediate any forced labour or child labour**

To date, DFBI has not identified any specific forced labour or child labour risks in its activities and supply chains.

**(e) Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains**

To date, DFBI has not identified any specific forced labour or child labour risks in its activities and supply chains. As a result, DFBI has also not taken any measures at this time to remediate loss of income to vulnerable families.

**(f) Training provided to employees on forced labour and/or child labour**

DFBI has not provided specific training to its employees on forced labour and child labour. DFBI is, however, currently involved in developing an action plan to create educational materials which will increase employee awareness around the issues of forced and/or child labour, as well as the *Act* and its goals and purposes.

**(g) Assessing effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains?**

DFBI regularly reviews and updates its internal policies and procedures to address new and emerging risks to all aspects of its business. As new information is gathered around modern slavery risks in its supply chains, new policies and procedures will be developed to address any current and emerging risks.

**Report Approval and Attestation**

In accordance with the *Act*, and in particular ss. 11(4) and 11(5), I attest that:

- (i) this Report of D.F. Barnes Industrial Limited has been reviewed and approved by the Board of Directors of D.F. Barnes Industrial Limited; and
- (ii) I have reviewed the information contained in report for D.F. Barnes Industrial Limited. 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.

Full Name: Jason Fudge

Title: President

Date: May 26, 2025

Signature: \_\_\_\_\_

I have the authority to bind D.F. Barnes Industrial Limited.