

## 2025 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

### Introduction

This report has been prepared by NDL Construction Ltd. (“NDL”) in accordance with the requirements set out in the *Fighting Against Forced Labour and Child Labour Supply Chains Act* (the “Act”). The information contained herein applies to NDL’s 2025 Financial Year.

### Structure, activities and supply chains

#### Structure

NDL is a privately owned, 100% Canadian company. NDL was incorporated under *The Corporations Act* of Manitoba in 1974, and carries 50+ years of northern construction experience.

Headquartered in Winnipeg, Manitoba, the vast majority of our projects are located in northern Manitoba, Ontario and Nunavut. Projects include construction of schools, nursing stations, water treatment plants and other key infrastructure.

NDL employs under 20 office staff and up to 150 field staff, depending on current projects.

#### Activities and supply chains

NDL’s direct activities include shipping, construction camp operations, site work, concrete work and supervision. Additionally, as the general contractor NDL hires and oversees various project subcontractors, including mechanical, electrical, steel erection, roofing, and various specialty and finishing subcontractors.

NDL sources over 99.9% of its materials and equipment from well-established local suppliers. Additionally, all of our subcontractors are Canadian based companies.

### Policies and due diligence

NDL has implemented a *Forced Labour and Child Labour Policy*, which acknowledges the very real problem of forced/child labour and outlines NDL's commitment to addressing this issue within our supply chains.

Should supply chains be known to incorporate forced/child labour, NDL is committed to taking all reasonable steps to find alternate supply chains that pose less of a risk.

### Forced Labour or Child Labour risks

To date, NDL is unaware of the presence of forced/child labour in any of our supply chains. That said, we acknowledge that we do not always know where products and materials incorporated into our projects come from and under what labour conditions they are produced.

### Measures taken to remediate any forced labour or child labour

As NDL has no knowledge of child/forced labour being used in any of its supply chains, NDL is not in a position to take any measures to remediate any forced/child labour.

### Measures taken to remediate the loss of income

As NDL has no knowledge of child/forced labour being used in any of its supply chains, NDL is not in a position to take any measures to remediate the loss of income associated with forced/child labour.

### Training provided to employees

NDL's *Forced Labour and Child Labour Policy* forms a part of our *Employee and Subcontractor Handbook*, which is made available to all employees and subcontractors.

Furthermore, this topic will be covered in our regular staff training, with a focus on identifying risks and reporting any concerns.

### Assessing effectiveness

Without having identified/remediated instances of forced/child labour within our supply chains, NDL is not in a position to assess the effectiveness of measures taken. Our hope is that in raising awareness of this issue through distribution of our policies and staff training, any

instances of forced/child labour in our supply chains could be more easily identified and addressed.

**Approval and attestation**

This report has been approved by the Board of Directors of NDL Construction Ltd. In accordance with the requirements of the Act, we attest that we have reviewed the information contained in the report and, having exercised reasonable diligence, we attest that the information is true and accurate.

Signed as of the 20<sup>th</sup> Day of February, 2026.

  
Jonathan Barg, Director/Officer