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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL
OF CYMI CANADA INC.

OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO

SECOND REPORT OF TDB RESTRUCTURING LIMITED

AS PROPOSAL TRUSTEE OF

CYMI CANADA INC.

JULY 3, 2026

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1.0 INTRODUCTION

1. This report is being submitted by TDB Restructuring Limited (“**TDB**”) in its capacity as proposal trustee (the “**Proposal Trustee**”) of CYMI Canada Inc. (“**CYMI**” or the “**Company**”) in connection with the Notice of Intention to Make a Proposal (the “**NOI**”) filed by CYMI on May 12, 2026 (the “**Filing Date**”), pursuant to Section 50.4(1) of the *Bankruptcy and Insolvency Act*.
2. The principal purposes of the NOI proceedings (these “**Proceedings**”) are to provide for a stay of proceedings to allow the Company to consider options, including, a liquidating proposal designed to maximize recoveries for creditors through an orderly realization of CYMI’s assets; and provide a formal process for CYMI’s creditors and stakeholders to obtain information about the Company.
3. On June 9, 2026, this Honourable Court granted a Stay Extension and Ancillary Order (the “**Initial Proposal Order**”), which among other things:
 - a) extended the time for CYMI to file a proposal to July 8, 2026;
 - b) approved the First Report of the Proposal Trustee dated June 5, 2026 (the “**First Report**”) and the activities described therein, a copy of the First Report (without Appendices) is attached hereto as **Appendix “A”**;
 - c) granted an Administration Charge (as defined below) in the amount of \$150,000; and
 - d) adjourned the balance of the relief sought, including approval of the proposed debtor-in-possession financing facility (the “**DIP Facility**”), the associated DIP Charge (as defined below), the balance of the requested Administration Charge and the requested extension of the stay of proceedings.
4. As further described below , since the granting of the Initial Proposal Order, the Proposal Trustee has continued to monitor CYMI's activities, receipts and disbursements, assisted management in evaluating and pursuing recoveries on its principal assets, attended meetings with the Company and stakeholders, and

consulted with CYMI and its professional advisors regarding the continued development of a proposal to creditors.

1.1 Purpose of the First Report to Court

5. The purpose of this report (the “**Second Report**”) is to provide the Court with further information related to the relief sought by the Company. This Second Report specifically provides information regarding:
 - a) the Proposal Trustee’s activities since the First Report;
 - b) an update on CYMI’s activities and the development of the proposal;
 - c) the Proposal Trustee's comments on the Company's performance against the Cash Flow Forecast since the granting of the Initial Proposal Order; and
 - d) CMYI’s application for an Order which includes, among other things:
 - i. extending the period in which CYMI can make a proposal to its creditors and the stay of proceedings up to and including August 21, 2026 (the “**Stay Extension**”)
 - ii. approving the Second Report and the activities described herein;
 - iii. increasing the following charges against CYMI’s current and future assets, in the following relative priorities:
 1. first – an increase to the charge in the maximum amount of \$500,000 in respect of amounts borrowed under the Interim Financing Facility (the “**Interim DIP Charge**”); and
 2. second – an increase to the charge to not exceed \$500,000 as security for the fees and disbursements of the Proposal Trustee, the Proposal Trustee’s counsel (the “**Administration Charge**”).

6. The Certificate of Filing, together with the Court documents related to the NOI proceeding, have been posted on the Proposal Trustee's website, which can be found here: <https://tdbadvisory.ca/insolvency-case/cymi/> (the "**Case Webpage**").

1.2 Terms of Reference

7. In preparing this Second Report and making the comments herein, the Proposal Trustee has relied upon information from third-party sources (collectively, the "**Information**"). Certain of the information contained in the Second Report may refer to, or is based on, the Information. As the Information has been provided by other parties or obtained from documents filed with the Court in this matter, the Proposal Trustee has relied on the Information and, to the extent possible, reviewed the Information for reasonableness. However, the Proposal Trustee has not audited or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Canadian Auditing Standards pursuant to the Chartered Professional Accountants Canada Handbook and, accordingly, the Proposal Trustee expresses no opinion or other form of assurance in respect of the Information.
8. An examination of the Cash Flow Forecast as outlined in the Chartered Professional Accountants of Canada Handbook has not been performed. Future oriented financial information relied upon in this Second Report is based upon the Company's assumptions regarding future events; actual results achieved may vary from this information and these variations may be material. The Proposal Trustee expresses no opinion or other form of assurance on whether the Cash Flow Forecast will be achieved.
9. Unless otherwise stated, all dollar amounts contained in the Second Report are expressed in Canadian dollars.
10. Unless otherwise indicated herein, capitalized terms used but not otherwise defined in this Second Report shall have the meanings ascribed to them in the First Report.

2.0 BACKGROUND

11. The details of CYMI's background, its business and operations, financial circumstances, and the events leading to the filing of the Notice of Intention can be found in the Affidavit of Oscar De la Fuente Tomé sworn June 5, 2026 (the "**First Tomé Affidavit**"), which was filed in support of the motion heard on June 9, 2026.
12. The developments since the filing of the NOI, including the Company's restructuring efforts, the discovery of additional potential asset realizations, and the relief sought on the within motion, are set out in the Affidavit of Oscar De la Fuente Tomé sworn July 2, 2026 (the "**Second Tomé Affidavit**"), filed in support of this motion. Those matters are not repeated herein except where necessary to provide context for the comments and recommendations of the Proposal Trustee.

3.0 ACTIVITIES OF THE PROPOSAL TRUSTEE

13. Since the granting of the Initial Proposal Order, the Proposal Trustee has continued to supervise the NOI Proceedings and assist CYMI in advancing its restructuring efforts. In particular, the Proposal Trustee has, among other things:
 - a) monitored CYMI's receipts and disbursements and ongoing cash requirements;
 - b) participated in regular meetings and discussions with CYMI's management and legal counsel regarding the progress of the restructuring proceedings;
 - c) reviewed information relating to the Company's principal assets and anticipated recoveries;
 - d) corresponded with various stakeholders respecting the restructuring process;
 - e) reviewed the Company's ongoing cash requirements and liquidity needs;
 - f) consulted with CYMI regarding the development of a proposal to creditors;
 - g) reviewed the relief sought in connection with the within motion;
 - h) maintained the Case Webpage for these Proceedings; and

- i) prepared this Second Report.

3.1 Restructuring Activities Since the Initial Proposal Order

14. As described in the Second Tomé Affidavit, the Company has continued its efforts to pursue recovery of the approximately \$4.9 million receivable relating to the Mosaic Transit Group project (the "**Mosaic Holdback**"). The Proposal Trustee has monitored those collection efforts, reviewed supporting information and participated in discussions regarding the timing and collectability of the Mosaic Holdback. While the Proposal Trustee continues to view the Mosaic Holdback as a significant potential realization, the timing and amount of any recovery remain uncertain.
15. During the course of the NOI Proceedings since the last extension was granted on June 9, 2026, the Company also advised the Proposal Trustee that it had located a further material agreement that could provide an additional source of recovery. As described in Second Tomé Affidavit, the Proposal Trustee understands any such recovery remains contingent upon a number of factors.
16. The Company also undertook a further review of its historical records to determine whether any additional material assets had not previously been identified. The Proposal Trustee understands that no additional material assets were identified through that review.
17. The Proposal Trustee was also advised that the Canada Revenue Agency ("**CRA**") issued a reassessment reversing certain input tax credits and increasing CRA's asserted trust claim. The Company has advised the Proposal Trustee that it is considering its available remedies in respect of the reassessment. The Proposal Trustee has not independently assessed the merits of any potential objection and simply notes that the quantum of CRA's claim remains subject to further determination.
18. Following the June 9, 2026 hearing, discussions continued between CYMI, BNA Constructors Canada GP ("**BNA**") and their respective advisors. The Proposal Trustee has participated in some of those discussions and understands they have been

constructive. The Proposal Trustee further understands that the determination of BNA's contingent claim remains an important consideration in the formulation of the Company's proposal, as it may affect both the claims pool and the anticipated recoveries available to creditors.

19. Overall, the Proposal Trustee is satisfied that the Company has continued to act in good faith and with due diligence in advancing these NOI Proceedings. Since the Initial Proposal Order, meaningful progress has been made in assessing the Company's principal asset realizations, addressing issues affecting the claims process and continuing the development of a proposal to creditors.

4.0 CASH FLOW FORECAST

20. Since the granting of the Initial Proposal Order, the Proposal Trustee has continued to monitor the Company's actual cash receipts and disbursements against the Cash Flow Forecast.
21. Based on the Proposal Trustee's review of the Company's post-filing operations and available financial information, the Proposal Trustee is satisfied that the Company's actual disbursements have generally tracked the assumptions contained in the Cash Flow Forecast. The variance in actual cash receipts is primarily attributable to the absence of any borrowings under the proposed DIP Facility, as approval of the DIP Facility and corresponding Interim DIP Charge was adjourned by the Court at the June 9, 2026 hearing.
22. Other than the absence of the projected DIP advances, the Proposal Trustee is satisfied that the Company's actual cash receipts have generally tracked the Cash Flow Forecast.
23. A copy of the Cash Flow Forecast including the Company's budget-to-actual analysis comparing the forecast to the Company's actual receipts and disbursements is attached hereto as **Appendix "B"**. The budget-to-actual analysis demonstrates that the principal variance in disbursements relates to the timing of professional fee

payments, while the principal variance in receipts relates to the absence of borrowings under the proposed DIP Facility.

24. While the Cash Flow Forecast demonstrates that the Company presently has sufficient liquidity to continue the restructuring process, it provides only limited flexibility should there be delays in realizing upon the Company's principal assets or other unforeseen contingencies arise during the restructuring proceedings.
25. The Proposal Trustee will continue to monitor the Company's cash position throughout the NOI Proceedings.

5.0 DIP AND INTERIM FINANCING

26. The proposed debtor-in-possession financing facility (the "**DIP Facility**") and the terms of the related DIP Term Sheet are described in detail in the Proposal Trustee's First Report and the First Tomé Affidavit. The reasons supporting the continued approval of the DIP Facility are further described in the Second Tomé Affidavit.
27. As noted in the First Report, the DIP Facility is intended to provide CYMI with access to up to \$500,000 in interim financing from CYMI Spain should additional liquidity be required during these NOI Proceedings. While the relief sought in respect of the DIP Facility was adjourned at the June 9, 2026 hearing, the Proposal Trustee's views regarding the appropriateness of the proposed financing have not changed.
28. Since the granting of the Initial Proposal Order, the Proposal Trustee has continued to monitor the Company's liquidity, cash flow requirements and restructuring efforts. Although the Company's cash flow has generally tracked the Cash Flow Forecast and there have been no material adverse variances, the Proposal Trustee remains of the view that the proposed DIP Facility represents a prudent liquidity backstop while CYMI continues its efforts to realize upon its principal assets and develop a proposal to creditors.
29. As discussed in this Report, the Company's anticipated recoveries are largely dependent upon the realization of the Mosaic Holdback and the potential Champlain

receivable, both of which remain subject to uncertainties regarding timing and collectability. In the Proposal Trustee's view, maintaining access to the DIP Facility provides the Company with the financial flexibility necessary to continue pursuing those recoveries without jeopardizing the restructuring process.

30. The Proposal Trustee remains satisfied that the terms of the proposed DIP Facility are reasonable in the circumstances. The requested borrowings are limited to an amount the Proposal Trustee considers appropriate having regard to the Company's anticipated funding requirements and are intended to preserve and maximize value for the benefit of all stakeholders.
31. Accordingly, the Proposal Trustee continues to support the approval of the DIP Facility and the granting of the proposed Interim DIP Charge.

6.0 COURT ORDERED CHARGES

6.1 Administration Charge

32. Pursuant to the Initial Proposal Order, this Court approved an Administration Charge in the amount of \$150,000 to secure the fees and disbursements of the Proposal Trustee, counsel to the Proposal Trustee and counsel to the Company for the period up to July 7, 2026.
33. As described in the Second Tomé Affidavit, the Company now seeks an increase in the Administration Charge from \$150,000 to \$500,000 to secure the professional fees and disbursements anticipated to be incurred during the balance of these NOI Proceedings.
34. As described in the First Report, an Administration Charge is a common feature of restructuring proceedings including NOI proceedings and the increased quantum requested is appropriate in light of the nature of the proceeding and anticipated work to be completed, in TDB's view, given its previous history and experience with restructurings of similar size and complexity.

35. The Proposal Trustee understands that the DIP Lender is supportive of the Administration Charge.
36. As described in the First Report, the Proposal Trustee was supportive of the proposed Administration Charge and its view are unchanged. The Proposal Trustee supports the request for the Administration Charge, pursuant to section 64.2(1) of the BIA, on the basis that it provides payment certainty for the professionals involved and allows them to effectively participate in the proceedings.

6.2 Priority of Charges

37. The Company proposes that the charges have the following priority (with maximum amounts in brackets):
 - a) first, the Administration Charge (\$500,000); and
 - b) second the Interim DIP Charge (\$500,000).
38. The Proposal Trustee is of the view that the priority of the above charges is appropriate and in the interest of facilitating these proceedings.

7.0 EXTENSION OF THE STAY OF PROCEEDINGS

39. The Company is seeking the Court's approval for the Stay Extension.
40. The Company believes that in order to formulate a plan for the restructuring process and maximize recoveries for all stakeholders, it will require additional time.
41. The Proposal Trustee has considered the Company's request for the Stay Extension and is supportive of this request for the following reasons:
 - a) the Company is acting in good faith and with due diligence;
 - b) the Stay Extension will provide the Company with an appropriate period in which to conduct the restructuring to the benefit of its creditors; and

- c) the Stay Extension does not appear to materially prejudice any of the Company's creditors.


8.0 CONCLUSION AND RECOMMENDATION

- 42. The Proposal Trustee respectfully recommends that this Court grant the relief sought by CYMI in the draft Order to maximize realizations for all creditors and stakeholders.

All of which is respectfully submitted to this Court as of this 3rd day of July 2026.

TDB RESTRUCTURING LIMITED, solely in its capacity as Proposal Trustee *re* CYMI Canada Inc. and not in its personal or corporate capacity

Per:



Bryan A. Tannenbaum, FCPA, FCA, FCIRP, LIT
Managing Director

Appendix A



TDB Restructuring Limited
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ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

**IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL
OF CYMI CANADA INC.**

OF THE CITY OF TORONTO, IN THE PROVINCE OF ONTARIO

**FIRST REPORT OF TDB RESTRUCTURING LIMITED
AS PROPOSAL TRUSTEE OF
CYMI CANADA INC.**

JUNE 6, 2026

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1.0 INTRODUCTION

1. This report is being submitted by TDB Restructuring Limited (“**TDB**”) in its capacity as proposal trustee (the “**Proposal Trustee**”) of CYMI Canada Inc. (“**CYMI**” or the “**Company**”) in connection with the Notice of Intention to Make a Proposal (the “**NOI**”) filed by CYMI on May 12, 2026 (the “**Filing Date**”), pursuant to Section 50.4(1) of the *Bankruptcy and Insolvency Act*. A copy of the certificate of filing issued by the Office of the Superintendent of Bankruptcy is attached as **Appendix “A”** to this report.
2. The principal purposes of the NOI proceedings (these “**Proceedings**”) are to provide for a stay of proceedings to allow the Company to consider options, including, the preparation for a liquidating proposal designed to maximize recoveries for creditors through an orderly realization of CYMI’s assets to maximize value of the Company’s assets for the benefit of its stakeholders; and provide a formal process for CYMI’s creditors and stakeholders to obtain information about the Company.

1.1 Purpose of the First Report to Court

3. The purpose of this report (the “**First Report**”) is to provide the Court with further information related to the relief sought by the Company. This First Report specifically provides information regarding:
 - a) the background on the Company, their financial position, and the reasons for the NOI filing;
 - b) the Proposal Trustee’s activities since the Filing Date;
 - c) the Proposal Trustee’s comments on the Company’s cash flow forecast for the period May 12, 2026, to August 9, 2026 (the “**Cash Flow Forecast**”); and
 - d) CMYI’s application for an Order which includes, among other things:

- i. extending the period in which CYMI can make a proposal to its creditors and the stay of proceedings up to and including July 24, 2026 (the “**Stay Extension**”)
- ii. granting the following charges against CYMI’s current and future assets, in the following relative priorities:
 1. first - a charge in the maximum amount of \$500,000 in respect of amounts borrowed under the Interim Financing Facility (as defined herein) (the “**Interim DIP Charge**”); and
 2. second - a charge to not exceed \$500,000 as security for the fees and disbursements of the Proposal Trustee, the Proposal Trustee’s counsel, and the Company’s counsel (the “**Administration Charge**”).
4. The Certificate of Filing, together with the Court documents related to the NOI proceeding, have been posted on the Proposal Trustee’s website, which can be found here: <https://tdbadvisory.ca/insolvency-case/cymi/> (the “**Case Webpage**”).

1.2 Terms of Reference

5. In preparing this First Report and making the comments herein, the Proposal Trustee has relied upon information from third-party sources (collectively, the “**Information**”). Certain of the information contained in the First Report may refer to, or is based on, the Information. As the Information has been provided by other parties or obtained from documents filed with the Court in this matter, the Proposal Trustee has relied on the Information and, to the extent possible, reviewed the Information for reasonableness. However, the Proposal Trustee has not audited or otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Canadian Auditing Standards pursuant to the Chartered Professional Accountants Canada Handbook and, accordingly, the Proposal Trustee expresses no opinion or other form of assurance in respect of the Information.

6. An examination of the Cash Flow Forecast as outlined in the Chartered Professional Accountants of Canada Handbook has not been performed. Future oriented financial information relied upon in this First Report is based upon the Company's assumptions regarding future events; actual results achieved may vary from this information and these variations may be material. The Proposal Trustee expresses no opinion or other form of assurance on whether the Cash Flow Forecast will be achieved.
7. Unless otherwise stated, all dollar amounts contained in the First Report are expressed in Canadian dollars.

2.0 BACKGROUND

8. The details of CYMI's background, and the events leading up to the filing of the NOI can be found in the Affidavit of Oscar De la Fuente Tome sworn June 5, 2026 (the "**Tome Affidavit**"), which is included in the Company's motion materials.

2.1 Secured Creditors

9. The Company has no secured creditors.
10. A copy of a PPSA search report for Ontario in respect of CYMI is attached as Exhibit "C" to the Tome Affidavit. It shows a precautionary registration made the day before the BIA filing by CYMI Spain in anticipation of providing DIP financing should that be approved.

2.2 Unsecured Creditors

11. The Company's preliminary list of creditors was filed with its NOI statutory documents and is available on the Case Webpage.
12. CYMI Spain is the largest unsecured creditor in the amount of approximately \$20.5 million.

3.0 ACTIVITIES OF THE PROPOSAL TRUSTEE

13. Since its appointment, the Proposal Trustee has performed the following activities:
 - a) attended on-going meetings with management, located in Spain, to discuss the proposal process;
 - b) assisted the Company with their communications to both internal and external stakeholders;
 - c) filed the necessary prescribed forms required pursuant to the BIA for the NOI;
 - d) issued the required notice pursuant to section 50.4(6) of the BIA to all known creditors of the Company;
 - e) assisted the Company in preparing the Cash Flow Statement;
 - f) corresponded and held numerous discussions with management and the Company's counsel, with respect to general filing matters and specific matters related to the development of the proposal;
 - g) reviewed the proposed Spain Term Sheet (as defined herein);
 - h) maintaining the Case Website for these Proceedings; and
 - i) prepared this First Report.

4.0 CASH FLOW FORECAST

14. CYMI has prepared the Cash Flow Forecast for the period May 12, 2026, to August 9, 2026 (the "**Forecast Period**").
15. The Cash Flow Forecast was prepared by the Company with the assistance of the Proposal Trustee. CYMI's receipts during the Forecast Period consist primarily of rent collected from the sublease of its leased premises, as well as funds projected to be advanced pursuant to the Interim Financing Facility. The Company's disbursements

in the Forecast Period are comprised mostly of professional fees and general operating expenses.

16. The Proposal Trustee has reviewed the Cash Flow Forecast and CYMI's underlying assumptions, and it is the Proposal Trustee's view that the Cash Flow Forecast and the assumptions contained therein are reasonable. A copy of the Cash Flow Forecast, along with a copy of the Proposal Trustee's report on CYMI's Cash Flow Forecast which was filed with the official receiver pursuant to Section 50.4(2)(b) of the BIA, are collectively attached as **Appendix "B"** to this report.

5.0 DIP AND INTERIM FINANCING

17. As set out in the Tome Affidavit, the Company has received a term sheet for DIP financing from a related-party lender, and the proposed terms are acceptable to the Company. The proposed DIP lender, Control y Montajes Industriales CYMI, S.A ("**CYMI Spain**" or the "**DIP Lender**"), a non-arm's length party has agreed to provide the Interim Financing Facility up to a maximum of \$500,000.
18. As described in the Tome Affidavit, the Company's Cash Flow Forecast indicates that the Company is expected to have sufficient liquidity to continue operating throughout the Proposal Proceedings based on projected receipts and disbursements. However, the forecast leaves little room for error and the collection of the Company's principal asset, being the Mosaic Holdback, remains disputed.
19. Accordingly, the Company is seeking approval of the Interim Financing Facility as a prudent backstop to provide additional liquidity, if required, during these Proposal Proceedings. The Interim Financing Facility would provide the Company with the financial flexibility necessary to support the restructuring process, including the realization of its assets and the development and implementation of a proposal to creditors.
20. CYMI Spain has provided a term sheet to the Company which sets out the terms upon which CYMI Spain is prepared to advance funds (the "**Spain Term Sheet**"). A copy of the Spain Term Sheet is attached as **Appendix "C"** to this report.

21. The material terms of the Spain Term Sheet include the following:

Terms not defined within this First Report are defined within the Spain Term Sheet.

Key Terms	Description
Borrower	CYMI Canada Inc.
Lender	Control y Montajes Industriales CYMI, S.A
Facility	A super-priority, debtor-in-possession credit facility up to a maximum principal amount of \$500,000 (the “ Interim Financing Facility ”).
Security	The Interim Financing Facility will be secured by the Interim DIP Charge, a super-priority Court-ordered charge, on all of the Company’s property.
Interest Rate	Interest on the principal amount of the Facility outstanding from time to time shall be calculated at a rate of three percent (3%) per annum, which interest shall be calculated on the daily outstanding balance owing under the Facility.
Commitment Fee	None.
Repayment	The Interim Financing Facility shall be due, owing, payable and repaid as the Termination Date without further notice, protest, demand or other act on the part of the DIP Lender.

24. The Proposal Trustee believes that the terms offered by the DIP Lender are reasonable in the circumstances.

25. The Company is seeking an Interim DIP Charge to secure the Interim Financing Facility, which is required pursuant to the terms of the Spain Term Sheet. The Interim DIP Charge is intended to rank in priority to all encumbrances. The Interim DIP Charge will not secure any obligations incurred prior to the Filing Date.

26. The Proposal Trustee is of the view that the Company’s request for approval of the Interim Financing Facility and the Interim DIP Charge is reasonable, the requested quantum of the Interim Financing Facility and Interim DIP Charge is appropriate in the circumstances and may be required to provide the Company with the necessary financing while it formulates a restructuring plan and proposal to its creditors. The

Proposal Trustee is not aware of any creditors who would be materially prejudiced by the granting of the Interim DIP Charge. If this financing is not approved, the Company will not have access to capital, if needed.

6.0 COURT ORDERED CHARGES

6.1 Administration Charge

27. The Company is seeking an Administration Charge in an amount not to exceed \$500,000 to secure the professional fees and disbursements of the Proposal Trustee, the Proposal Trustee's legal counsel and the Company's legal counsel, whether incurred before or after the Filing Date, in priority to all other charges and encumbrances except for the Interim DIP Charge in respect of the fees and disbursements of the Proposal Trustee, its counsel, and the Company's counsel. An Administration Charge is a common feature of restructuring proceedings including NOI proceedings and the quantum requested is appropriate in light of the nature of the proceeding and anticipated work to be completed, in TDB's view, given its previous history and experience with restructurings of similar size and complexity.
28. The Proposal Trustee understands that the DIP Lender is supportive of the Administration Charge. There are no secured creditors who would be primed by the Administration Charge.
29. The Proposal Trustee supports the request for the Administration Charge, pursuant to section 64.2(1) of the BIA, on the basis that it provides payment certainty for the professionals involved and allows them to effectively participate in the proceedings.

6.2 Priority of Charges

30. The Company proposes that the charges have the following priority (with maximum amounts in brackets):
 - a) first, the Interim DIP Charge (\$500,000); and

b) second, the Administration Charge (\$500,000).

31. The Proposal Trustee is of the view that the priority of the above charges is appropriate and in the interest of facilitating these proceedings.

7.0 EXTENSION OF THE STAY OF PROCEEDINGS

32. The Company is seeking the Court's approval for the Stay Extension.

33. The Company believes that in order to formulate a plan for the restructuring process and maximize recoveries for all stakeholders, it will require additional time.

34. The Proposal Trustee has considered the Company's request for the Stay Extension and is supportive of this request for the following reasons:

a) the Company is acting in good faith and with due diligence;

b) the Stay Extension will provide the Company with an appropriate period in which to conduct the restructuring to the benefit of its creditors; and

c) the Stay Extension does not appear to materially prejudice any of the Company's creditors.

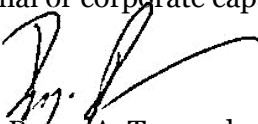
8.0 CONCLUSION AND RECOMMENDATION

35. The Proposal Trustee respectfully recommends that this Court grant the relief sought by CYMI in the draft Order to maximize realizations for all creditors and stakeholders.

All of which is respectfully submitted to this Court as of this 6th day of June 2026.

TDB RESTRUCTURING LIMITED, solely in its capacity
as Proposal Trustee *re* CYMI Canada Inc. and not in its
personal or corporate capacity

Per:



Bryan A. Tannenbaum, FCPA, FCA, FCIRP, LIT
Managing Director

Appendix B

CYMI Canada Inc.
13-Week Cash Flow Forecast
For the Period ended August 9, 2026

CAD; week ended	Notes	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Projected	Projected	Projected	Projected	Projected	Total
		Week 1	Week 1	Week 2	Week 2	Week 3	Week 3	Week 4	Week 4	Week 5	Week 5	Week 6	Week 6	Week 7	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12	Week 13	
		17-May-26	17-May-26	24-May-26	24-May-26	31-May-26	31-May-26	7-Jun-26	7-Jun-26	14-Jun-26	14-Jun-26	21-Jun-26	21-Jun-26	28-Jun-26	28-Jun-26	5-Jul-26	12-Jul-26	19-Jul-26	26-Jul-26	2-Aug-26	9-Aug-26	
Opening Cash		284,489	284,489	357,989	283,665	352,989	285,696	347,989	285,690	338,873	285,549	333,873	288,939	328,873	300,763	323,873	314,757	309,757	304,757	299,757	290,642	284,489
Receipts																						
DIP Financing	1	100,000	83,000	21,500		21,500		21,500		21,500		21,500		21,500		21,500	21,500	21,500	21,500	21,500	21,500	358,000
Rental Income	2	-	-	-	2,462.00	-	-	3,390	-	-	3,390.00	-	15,885.59	-	-	3,390	-	-	-	3,390	-	10,170
Total Receipts		100,000	83,000	21,500	2,462	21,500	-	24,890	-	21,500	3,390	21,500	15,886	21,500	-	24,890	21,500	21,500	21,500	24,890	21,500	368,170
Disbursements																						
Contractor	3	-	-	-	-	-	-	3,000	-	-	-	-	-	-	-	3,000	-	-	-	3,000	-	9,000
Utilities and General	4	-	-	-	-	-	-	1,200	-	-	-	-	-	-	-	1,200	-	-	-	1,200	-	3,600
Rent Paid	5	-	-	-	-	-	-	3,306	-	-	-	-	-	-	-	3,306	-	-	-	3,306	-	9,917
Professional fees (Trustee and Legal)	6	26,500	83,823	26,500	431	26,500	6	26,500	140	26,500	-	26,500	4,062	26,500	17,431	26,500	26,500	26,500	26,500	26,500	26,500	344,500
Total Disbursements		26,500	83,823	26,500	431	26,500	6	34,006	140	26,500	-	26,500	4,062	26,500	17,431	34,006	26,500	26,500	26,500	34,006	26,500	367,017
Closing Cash		357,989	283,665	352,989	285,696	347,989	285,690	338,873	285,549	333,873	288,939	328,873	300,763	323,873	283,332	314,757	309,757	304,757	299,757	290,642	285,642	285,642

Source: Information provided by Management

Notes

- 1 Represents amounts anticipated to be advanced by the Company's parent entity, subject to Court approval, with such advances ranking in priority to all existing encumbrances.
- 2 Represents monthly rental income received from a tenant subleasing the Company's leased premises.
- 3 Represents payment to an independent contractor of the Company who would complete any outstanding warranty work.
- 4 Represents fixed monthly payments to service providers.
- 5 Represents monthly rental payment for the Company's leased premises.
- 6 Professional fees payable to legal counsel for the Debtor, counsel for the Trustee, and the Trustee in connection with restructuring activities.

**THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF
CYMI CANADA INC. FILED IN THE CITY OF OTTAWA, IN THE PROVINCE OF
ONTARIO**

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

PROCEEDING COMMENCED AT
TORONTO

SECOND REPORT OF THE PROPOSAL TRUSTEE

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