



2025 Modern Slavery Report

Redpath Mining Inc.
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TABLE OF CONTENTS

- 1.0 INTRODUCTION3
- 2.0 STEPS TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR.....3
- 3.0 STRUCTURE ACTIVITIES, AND SUPPLY CHAINS3
- 4.0 POLICIES, GOVERNANCE AND DUE DILIGENCE PROCESSES.....4
 - 4.1 Human Rights Statement.....4
 - 4.2 Code of Conduct4
 - 4.3 Supplier Code of Conduct.....4
 - 4.4 Due Diligence Policy5
 - 4.5 Reporting and Non-Retaliation policy.....5
- 5.0 ASSESSING AND MANAGING OUR RISK.....7
- 6.0 REMEDIATION MEASURES7
- 7.0 TRAINING7
- 8.0 ASSESSING EFFECTIVENESS8
- 9.0 FUTURE COMMITMENTS (2026 AND BEYOND).....8
- 10.0 APPROVAL ATTESTATION9

1.0 INTRODUCTION

This Modern Slavery Report is published by Redpath Mining Inc. ("Redpath" or the "Corporation") on behalf of its subsidiaries in Canada for the fiscal year ending December 31, 2025 ("Reporting Period"). These subsidiaries include:

1. Redpath Raiseboring Limited.
2. Redpath Global Mobility Services Inc.
3. Redpath Canada Limited.

This report summarizes actions taken by Redpath to address and mitigate risks associated with forced labour and child labour, in line with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act").

2.0 STEPS TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

Redpath continues to recognize respect for human rights as a core corporate responsibility. During 2025, the Corporation advanced its approach from periodic due diligence to continuous monitoring and risk intelligence, significantly strengthening its ability to detect and respond to modern slavery risks.

Key actions in 2025 include:

- Expansion of mandatory global training incorporating Modern Slavery awareness.
- Deployment of advanced supplier monitoring tools across key jurisdictions.
- Strengthening of supplier onboarding and ongoing due diligence processes.
- Increased integration of compliance oversight into operational and procurement functions.
- Continued alignment with the United Nations Global Compact principles.

3.0 STRUCTURE ACTIVITIES, AND SUPPLY CHAINS

Headquartered in North Bay, Ontario, Redpath Mining Inc. provides a comprehensive array of underground mining infrastructure services globally. Our extensive operations encompass 12 countries across six continents, with 108 projects, in 81 different sites for 63 clients, including Mine Development, Shaft Sinking, Production Mining, and specialized services. As of 2025, the Corporation employed approximately 10000+ people globally and consistently applied rigorous

supplier management and due diligence procedures to mitigate risks of modern slavery within supply chains.

Redpath maintains active business relationships with a total of 3,541 suppliers globally, distributed across key Business Units (BUs) as follows: Africa (376), Australia (1,558), Europe (858), and the Americas including Canada (4562). Each of these suppliers has been issued a Modern Slavery Supplier Due Diligence questionnaire.

4.0 POLICIES, GOVERNANCE, AND DUE DILIGENCE PROCESSES

4.1 Human Rights Commitment

Redpath maintains a strict prohibition against:

- Forced labour
- Child labour
- Human trafficking
- Workplace exploitation

This commitment is embedded in corporate governance and operational practices.

4.2 Code of Ethics (the “Code”)

The Code applies to all Redpath employees, including the Board of Directors and management, across all locations and entities. It addresses ethical conduct in our work environment, business practices, and relationships with stakeholders, promoting honesty and integrity. It can be found at: [Code of Conduct | Compliance | Profile | Redpath Mining Contractors and Engineers](#).

The Code applies globally to all employees and is:

- Mandatory
- Subject to annual certification
- Inclusive of anti-corruption, human rights, and ethical conduct provisions

In 2025, training completion rates for core compliance modules ranged between **83% and 100% globally**, demonstrating strong organizational penetration.

4.3 Supplier Code of Conduct (the “Supplier Code”)

Redpath’s Supplier Code, updated in August 2023, aligns with the UNGC principles and outlines our expectations regarding human rights, labour, legal compliance, health and safety, the **REDPATH**

environment, anti- corruption, ethics, and governance. Promotes Fair Labour Practices and mandates legal and regulatory compliance. The Supplier Code includes provisions prohibiting child and forced labour.

It is available at: [Redpath Partners Code of Conduct \(redpathmining.com\)](https://www.redpathmining.com/redpath-partners-code-of-conduct).

Child Labour Provisions, Fair labour provisions and Forced Labour Provisions:

- Redpath prohibits all forms of forced labour, modern slavery, and human trafficking. Suppliers' employees must be free to leave work or terminate employment with reasonable notice and without surrendering government-issued identification or work permits.
- Redpath does not tolerate or use child labour in any stage of the suppliers' activities other than in accordance with all applicable laws and regulations.
- Redpath mandates suppliers compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs.

Redpath requires all suppliers to adhere to standards that:

- Prohibit forced and child labour
- Require fair wages and lawful working conditions
- Ensure freedom of employment and mobility

Compliance is contractually reinforced and monitored.

4.4 Due Diligence Framework (Enhanced 2025)

Redpath operates a multi-layered due diligence system, including:

(a) Supplier Questionnaires

- Mandatory Modern Slavery and human rights questionnaires
- Applied globally across all business units
- Follow-up and remediation processes for identified risks

(b) Continuous Monitoring – Prewave System

In 2025, Redpath significantly enhanced its monitoring capabilities through the implementation of **Prewave**, an advanced supply chain risk intelligence platform.

Scope:

- Monitors 4,562 suppliers globally for our Canadian dependant operation.
- Implemented in Canada and Europe
- Parallel systems operating in Australia
- Africa transitioning toward system-based monitoring (currently manual questionnaires)

Core Capabilities:

- Real-time monitoring of supplier risk exposure using AI-driven data analysis
- Detection of risk signals related to:
 - Forced labour
 - Child labour
 - Human rights violations
 - ESG and regulatory risks
- Continuous screening of global data sources (including media, sanctions lists, and regulatory disclosures)
- Automated alerts enabling proactive intervention
- Risk scoring and prioritization of suppliers
- Integration with supplier lifecycle management processes
- Support for corrective action planning and supplier engagement

This transition represents a material evolution from static assessments to dynamic, risk-based oversight.

(c) Enterprise-Wide Risk Management Framework

The Corporation is currently implementing an enterprise-wide risk management system (“ERM”) that defines its risk management framework, including principles, governance, and risk appetite. The ERM outlines how Redpath identifies, assesses, addresses, mitigates, and reports the risks it faces, including those related to modern slavery within its operations and supply chains. Furthermore, the ERM is subject to regular review to ensure it remains aligned with evolving risks and the requirements of the jurisdictions in which Redpath operates.

4.5 Reporting and Non-Retaliation Policy

Redpath's Reporting and Non-Retaliation Policy and Supplier Code provide mechanisms for employees and suppliers to report concerns about forced or child labour confidentially. Redpath maintains:

- A global 24/7 Ethics Line
- Multiple confidential reporting channels
- Strict non-retaliation protections

These mechanisms apply to both employees and third parties.

5.0 ASSESSING AND MANAGING OUR RISK

Redpath applies a **risk-based approach** to modern slavery, combining:

- Questionnaire-based assessments (all regions)
- Continuous monitoring systems (Canada, Europe, Australia)
- Manual supplier engagement (Africa, transitioning)
- Compliance incident tracking and trend analysis

This layered approach ensures:

- Early identification of high-risk suppliers
- Escalation protocols for material concerns
- Ongoing supplier evaluation rather than point-in-time reviews

6.0 REMEDIATION MEASURES

Where risks or non-compliance are identified, Redpath:

- Engages suppliers directly to implement corrective actions
- Monitors remediation progress
- Escalates unresolved issues
- May suspend or terminate supplier relationships where necessary

Remediation efforts are tracked and aligned with compliance protocols.

7.0 TRAINING

Training remains a central pillar of Redpath's prevention strategy.

2025 Enhancements:

- Expanded global Code of Conduct training (including Modern Slavery)
- Monthly compliance communication initiatives (video series)
- Increased onboarding training requirements
- Deployment of Compliance Champions to support local implementation

Training Metrics:

- High completion rates across core modules (83%–100%)
- Increased reach compared to 2024 baseline (1,288 employees trained)

Training content includes:

- Human rights and labour standards
- Ethical conduct and reporting obligations
- Supplier-related risk awareness

8.0 ASSESSING EFFECTIVENESS

In 2025, Redpath began transitioning from planned assessment (2024) to measurable effectiveness indicators, including:

- Training completion rates and regional performance tracking
- Supplier risk scoring and monitoring outputs (Prowave)
- Compliance incident trends and categorization
- Supplier engagement and remediation outcomes

Further formalization of effectiveness metrics is planned for future reporting periods.

9.0 FUTURE COMMITMENTS (2026 AND BEYOND)

Redpath will continue to strengthen its modern slavery framework through:

- Expansion of continuous monitoring systems to Africa
- Increased integration of compliance data into procurement decisions
- Further development of measurable effectiveness indicators
- Continued enhancement of training and awareness programs
- Ongoing refinement of supplier due diligence processes

10.0 APPROVAL AND ATTESTATION

This Report was approved by the Board of Directors of Redpath Mining Inc. in accordance with the Act.

I, the undersigned, attest that I have reviewed the information contained in this report and that, to the best of my knowledge, it is true, accurate, and complete in all material respects.

****George Flumerfelt****

Chief Executive Officer - Director of Redpath Inc.

Date: May 25th, 2026

George Flumerfelt Chief Executive Officer - Director of Redpath Inc. Date: May 25th, 2026