



2023 Modern Slavery Report

Redpath Mining Inc.
Reference No. 16052024v4

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1.0 INTRODUCTION

This Modern Slavery Report is issued by Redpath Mining Inc. on behalf of all its active subsidiaries in Canada ("Redpath" or the "Corporation" or "our" or "we") for the financial year ending December 31, 2023 (the "Reporting Period"). These subsidiaries are:

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

This Modern Slavery Report outlines the measures taken to prevent and mitigate the risk of forced labour or child labour in the production of goods, both in Canada and abroad, and in goods imported into Canada by the Corporation. This Report is Redpath's first under Canada's new 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

We consider respect for human rights a fundamental corporate responsibility, guiding all our activities. We mandate and prioritize respect for human rights in our business and operations and expect the same commitment from our partners. Redpath has ascribed to the United Nations Global Compact since 2017.

During the Reporting Period, we undertook the following actions to prevent and reduce the risk of forced labour or child labour within our business and supply chains:

- Reviewed and updated our Supplier Code of Conduct in August 2023.
- Mandated an initial internal assessment to identify the risks of forced labour and child labour within our supply chains, mandating Third-Party due diligence process based on geographical risk approach.
- We instituted updated training to all Redpath employees regarding Modern Slavery through our Code of Conduct Training program. Training which is repeated each year on an ongoing basis for all Redpath staff employees.

3.0 STRUCTURE ACTIVITIES, AND SUPPLY CHAINS

Redpath, a privately-owned company, is incorporated under the Canada Business Corporations Act.

Headquartered in North Bay, Ontario, Redpath builds underground mining infrastructure and renders a full suite of services to the underground mining industry. Services include, but are not limited to, Mine Development, Shaft Sinking, Mass Excavation, Production Mining, Underground Construction, Percussive Drilling, Engineering and Technical Services and other Specialty Services. In addition, Redpath designs, develops, manufactures, vertical mechanized raise drills, which include large, medium and smaller models to service the Mining Industry.

Additionally, the Corporation's replicates this variety of services worldwide, have a presence in 6 continents including the following countries: Canada, USA, Mexico, Peru, Germany, UK, Australia, Mongolia, Indonesia, South Africa, Botswana, Zambia, Ghana, with an ever-increasing footprint.

The Redpath group employs 6000 people in 15 countries as of December 31, 2023, fostering a diverse and inclusive culture across its operations.

Redpath's global supply chain includes, but is not limited to, suppliers of mining equipment manufacturers, mechanical parts suppliers, including steel bits, parts and assemblies, hydraulics, engines, electrical components and systems, concrete, shotcrete, tires, hoses, mesh and other non-product goods and services. Redpath maintains relationships with approximately 2,250 suppliers for the Canadian Business.

We apply a risk based due diligence to sourcing products and services that are higher risk for social, ethical, environmental and geographical elements. Suppliers who provide higher risk products and services are asked to complete detailed questionnaires. Redpath assesses these responses and engages in dialogue with the supplier to set corrective action, if areas of improvement are identified.

4.0 POLICIES, GOVERNANCE, AND DUE DILIGENCE PROCESSES

4.1 Human Rights Statement

Respect for basic human rights, including rights to life and liberty, freedom of thought and expression, and equality; no tolerance for and protections against workplace harassment or abuse, violence, and discrimination (including for reasons of a person's race, colour, sex, sexual orientation, gender identity, national origin, religion, veteran status, marital status or disability).

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](#).

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 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.

4.4 Due Diligence Policy

While pursuit of our business goals is essential to Redpath’s success, the way by which we achieve them is equally important. Redpath engages with suppliers in various categories, such as in mining operations, professional services, information and technology, human resources, travel and marketing. We apply a risk based due diligence to sourcing products and services that are higher risk for social, ethical, environmental and geographical elements. Suppliers who provide higher risk products and services are asked to complete detailed questionnaires. Redpath assesses these responses and engages in dialogue with the supplier to set corrective action, if areas of improvement are identified. That’s why we have various internal policies, standards and guidelines that cover the conduct of our employees, directors and businesses, and how we select and work with our suppliers (Redpath Supplier Code of Conduct – RSEC rev2).

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. Reports can be made through various channels, including supervisors, HR, legal services, or the Compliance Officer. A confidential Ethics Line is also available 24/7 globally.

5.0 ASSESSING AND MANAGING OUR RISK

Redpath uses a risk-based approach to assess and manage the risk of forced and child labour, prioritizing efforts based on supplier risk scores derived from country risk indicators, product type, and supplier location. This approach includes a comprehensive monitoring solution to detect global events impacting the supply chain.

6.0 REMEDIATION MEASURES

Redpath's Reporting and Non-Retaliation Policy, Code of Ethics, and Supplier Code provide mechanisms for reporting ethical or legal violations. If non-compliance is identified, Redpath works to develop and implement corrective plans.

7.0 TRAINING

Redpath provides regular training on ethical topics and policies to its employees. All staff and new office employees undergo mandatory training on the Code of Ethics on an ongoing basis, and annual certification is required. In 2024, Redpath plans to include training on child and forced labour.

8.0 ASSESSING EFFECTIVENESS

Redpath has implemented measures to prevent and reduce forced and child labour risks. We plan to assess the effectiveness of these actions in our activities and supply chains at a later stage.

9.0 APPROVAL AND ATTESTATION

This Report was approved by the Board of Directors of Redpath Inc. in accordance with subparagraph 11(4)(a) of the Act.

I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge and reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.

****George Flumerfelt****

Chief Executive Officer - Director of Redpath Inc.

Date: May 29th, 2024