



2023 REPORT UNDER THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Introduction

This report has been prepared by Almonty Industries Inc. (“Almonty”) in response to the reporting requirements under the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for Almonty’s financial year ending December 31, 2023. This report constitutes the first report prepared by Almonty pursuant to the Act.

Almonty recognizes that the mining industry plays an important role in preventing and assessing the risk of forced labour and child labour in supply chains. We acknowledge the risks of forced labour and child labour in the mining sector and are committed to continuous improvement in our due diligence, risk assessment, remediation and training processes in order to contribute to a more ethical operating environment that adheres to the greatest possible extent with international human rights conventions and ethical business practices.

Structure, Activities and Supply Chains

Almonty is a company continued under the *Canada Business Corporations Act*. Almonty’s common shares are listed on the Toronto Stock Exchange under the trading symbol “AII”. Almonty’s corporate headquarters are located in Toronto, Ontario.

The principal business of Almonty is the mining, processing and shipping of tungsten concentrate from its Los Santos Mine in western Spain and its Panasqueira mine in Portugal as well as the development of its Sangdong tungsten mine in Gangwon Province, South Korea and the development of the Valtreixal tin/tungsten project in northwestern Spain. Almonty does not own any mining properties in Canada and does not import goods into Canada.

As at December 31, 2023, Almonty had 16 non-unionized full-time employees at the Los Santos Mine; 138 unionized full-time employees and 231 full time employees at the Panasqueira Mine; 1 full-time, non-unionized employee and 6 full-time consultants and 1 part-time consultant working at the corporate office (1 consultant in Vancouver, 1 consultant in Paris, 2 consultants in Portugal, 3 consultants in Spain, one consultant in New York and 1 consultant in Korea); 38 full-time employees at the Sangdong Mine in Korea; and 1 part-time consultant at the Valtreixal Mine in Spain.

The vast majority of Almonty’s procurement activities occur through a central procurement function out of Pansquiera in respect of activities in the Iberian Peninsula and out of Sangdong in respect of activities in South Korea. Almonty procures a range of goods and services to support its exploration, mining, processing, transportation, development and sustainability activities. The Operations Managers at the mine sites are responsible for procurement governance, with

oversight by Almonty's executive team. Almonty has recently commenced a supplier mapping exercise to facilitate a more comprehensive understanding of the various risks related to "Modern Slavery" that may be present in its supply chain. Spain, Portugal and South Korea each are considered to have relatively lower levels of prevalence of modern slavery¹.

Almonty's Policies and Due Diligence Procedures

Almonty's core values are integrity, honesty, fair dealing and transparency. These values underpin Almonty's business and corporate governance and are disclosed in Almonty's Code of Business Conduct and other corporate governance policies. Together, the following policies form a framework of standards required of our Board of Directors, officers, employees, contractors and suppliers to ensure our operations are conducted in an ethical manner.

- Code of Business Conduct – Almonty maintains a Code of Business Conduct that, among other things, requires directors, officers, employees, and contractors of Almonty to act honestly, with integrity and in compliance with all applicable laws and regulations in fulfilling their duties and responsibilities.
- Anti-Bribery Policy – Almonty maintains an Anti-Bribery and Anti-Corruption Policy prohibits the making of bribes and improper payments, and places appropriate controls on the giving and receiving of gifts and donations.
- Whistleblower Policy – Almonty maintains a Whistleblower Policy to provide stakeholders with channels to raise concerns free from any consequences that could otherwise result from making a report.

In the coming months, we intend to review and update our policies and procedures in with a view to bolstering Almonty's commitment to operating in a manner that respects human rights and to identify and appropriately address risks associated with forced and child labour in our operations and supply chains.

Third Party Risk Management

The bulk of Almonty's procurement is done with globally recognized counterparties who have reputations for operating in accordance with best business practices. Almonty conducts due diligence internally on proposed third party supplies to ensure that they meet the standards for ethical business practices espoused in Almonty's Code of Business Conduct. Almonty intends to review its diligence practices in respect of third parties to ensure that specific assessment is done with respect to the risk that the counterparty engages in forced labour or child labour.

¹ Walk Free, "Global Slavery Index – Global Findings" available at <https://www.walkfree.org/global-slavery-index/>

Contracting Arrangements

In the current fiscal year, Almonty intends to review its contracting procedures to include standard terms and conditions that require our suppliers to certify that they do not and will not, directly or indirectly, knowingly engage in forced labour or child labour practices. Almonty will include the obligations that if a supplier breaches this term, the supplier is obligated to remedy that breach to Almonty's satisfaction and to terminate the contract if a supplier fails to adequately remedy or take reasonable action to address modern slavery issues.

Forced labour and child labour risk

Almonty's operations are located in relatively low-risk jurisdictions, based on the Global Slavery Index published by Walk Free². However, Almonty acknowledges that the nature of mining activities and related supply chains can create potential human rights risks. To date, our approach to identifying the risks of forced labour and child labour has focused on the sector we operate in, as well as the location of our activities and operations, and on employees, contractors and direct suppliers at our operating sites.

Our policies and procedures include the following risk identification factors:

- Red flags associated with forced labour and child labour, including lack of age verification; charging for recruitment, employment or repatriation fees; lack of written employment contracts; and the retention of employee identification documentation;
- The location of the contractor or supplier and the strength of rule of law in those jurisdictions;
- The industry and type of goods and services provided;
- Contractor history of known human rights violations or complaints; and
- Almonty's level of influence and relationship with the supplier and its workers.

Steps to prevent and reduce risks of forced labour and child labour

Almonty considers the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. Almonty places the highest importance on respecting human rights while conducting our business activities everywhere we operate. Almonty expects the same of its business partners.

For the fiscal year ending December 31, 2024, we intend to take the following actions to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

² <https://www.walkfree.org/global-slavery-index/>

- Review and update, where required, our internal policies and procedures and consider whether any new policies, such as a Supplier Code of Conduct may be prudent to adopt in light of our business activities and the jurisdictions in which we operate;
- Complete our preliminary initial internal assessment of the risks of forced labour and/or child labour in our supply chains to enhance our supplier Third-Party due diligence process; and
- Commence testing of any formal supplier Third-Party due diligence process we may adopt, which includes risks associated with forced and child labour, with selected suppliers with the objective of testing the process and improving it as necessary.

Measures Taken to Remediate Any Forced Labour or Child Labour or the Loss of Income to the Most Vulnerable Families

As stated above, Almonty has not encountered any incidents of forced labour or child labour being used in its operations or supply chain. Given there were no reports or incidents, Almonty has not had to take any measures to remediate any forced labour or child labour, or to remediate any loss of income to vulnerable families as a result of remediation efforts.

Training Provided to Employees on Forced Labour and Child Labour

Almonty employees are trained on its Code of Business Conduct. Such training includes information on Almonty's expectation that all employees comply with all company policies and procedures and all laws. Although this is not currently explicitly stated, compliance with such laws includes, but is not limited to, laws against forced labour and child labour and Almonty will be considering whether to include specific training on this matter on a going forward basis.

How Almonty Assesses Its Effectiveness in Ensuring Forced Labour and Child Labour Are Not Being Used in Its Business and Supply Chains

Almonty is at the preliminary stages of assessing its effectiveness in ensuring forced labour and child labour are not being used in its business activities and supply chains. While it has begun to take certain actions as described above, it has not yet taken steps to assess the effectiveness of those actions but will be reviewing such matter in due course.

Almonty's Objectives for 2024

Almonty is committed to continuous improvement in all aspects of our business operations, and this extends to our commitment to take meaningful steps to identify and combat risks associated with forced labour and child labour. For the year ending December 31, 2024, Almonty is currently intending to take the following actions, among others:

- Reviewing and updating, as appropriate, Almonty's policies and procedures and considering whether additional policies ought to be adopted;

- Strengthening workforce training and awareness on forced labour and child labour issues;
- Completing a mapping of its supply chain and conducting screening of its major supplies;
- Reviewing and updating contractual arrangements with third parties; and
- Increasing awareness of our whistleblower policies and encouraging reporting where appropriate.

Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Almonty Industries Inc. 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. This report has been approved by the Board of Directors of Almonty.

“I have the authority to bind Almonty Industries Inc.”

Lewis Black
President and Chief Executive Officer
May 31, 2024