



REPORT ON FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS DURING THE FISCAL YEAR ENDED DECEMBER 31, 2023

This report has been prepared by Alphamin Resources Corp. (“**Alphamin**” or the “**Company**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”) pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and is the Company’s first report under the Act.

Structure, Activities and Supply Chains

The Company is incorporated under the laws of Mauritius and its ordinary shares are listed for trading on the TSX Venture Exchange in Canada and the AltX board of the Johannesburg Stock Exchange in South Africa.

Alphamin is engaged in the mining, production and sale of high-grade tin concentrate from its Bisie tin mine located in the Walikale District, North Kivu Province of the east-central Democratic Republic of the Congo (“DRC”). The Company’s registered office is located Grand Baie, Mauritius and its head office is located in Johannesburg, South Africa.

On December 31, 2023, the Company and its subsidiaries had approximately 1,500 employees and 290 contractors at its Bisie tin mine, covering both the existing operations and the Mpama South development project under construction in FY2023.

The Company’s supply chain includes local, regional and national suppliers within the DRC and neighbouring countries, as well as international and multi-national suppliers based in South Africa, Australia, North America, across Europe and Asia. Goods and services sourced in the supply chain primarily include consumables and spares used in the production and processing of tin concentrate. The Company has established, where practical, long-term relationships with upstream suppliers and downstream customers that meet its Supply Chain transparency requirements and Responsible Supply Chain Policy. The Company’s contracts further stipulate that any sub-contractors appointed by the Company’s contractors and suppliers are subject to the terms and conditions outlined in the Company’s Responsible Supply Chain Policy and Code of Ethical Conduct.

Forced Labour and Child Labour: Policies and Due Diligence Processes

Policies

The Company is committed to the conduct of its business in an ethical and fair manner, to the promotion of a corporate culture which is non-sectarian and apolitical, and which is socially and environmentally responsible. It does this by subscribing to the following values and principles:

- Fairness and integrity in all business dealings, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Having respect for the human rights and the dignity of all employees;
- Acceptance of diverse cultures, religions, race, gender and sexual orientation;

- Honesty, transparency, accountability; and
- Adherence to sound standards of corporate governance and all applicable laws.

The above is outlined in the Company's Code of Ethical Conduct, which forms part of both senior employee and supplier onboarding packs, as well as all contracts entered into with stakeholders. Ongoing commitment thereto is affirmed on an annual basis and no transgressions with respect to forced or child labour were noted in the year ended December 31, 2023.

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognising that upstream mining companies have the responsibility to respect human rights and not contribute to conflict, the Company has adopted, made widely available and incorporated into contracts and/or agreements with suppliers the Company's Supply Chain Due Diligence Policy for responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user.

The Company has refrained from any action which contributes to the financing of conflict and it complies with relevant United Nations sanctions resolutions or, where applicable, international and domestic laws implementing such resolutions. The policy is publicly communicated via the Company's web site. The policy is reviewed annually and updated as necessary.

The Company's Human Rights Policy statement further outlines the Company's commitment to protect the non-exhaustive list of rights to human dignity, fair treatment, not to be subjected to slavery, servitude and forced labour, not to be employed if you are a child, fair labour practices and the rights to a workplace free from violence and intimidation, freedom of movement and freedom and security of person.

While sourcing from, or operating in, conflict-affected and high-risk areas, the Company will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered himself voluntarily;
- any form of child labour;
- other gross human rights violations and abuses such as widespread sexual and gender-based violence; and
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

The Company's DRC subsidiary, Alphamin Bisie Mining SA (ABM), conformed to the requirements of the ICGLR Regional Certification Mechanism and received a Green status in 2021 as there were no issues identified or associated with Conflict, Human Rights or Formality/Transparency. There were items identified that would strengthen the ABM management system; these items have subsequently been addressed and are subject to validation in early 2025 when ABM will be required to undergo their second ICGLR Third-Party Audit.

The Company does not accept behaviour which is inconsistent with its Code of Ethical Conduct, Human Rights Policy Statement and Responsible Supply Chain Policy by any employee, contractor, supplier or Board Member and the above parties are required to report any such behaviour using the established grievance procedure if disclosure is chosen, or through the Company toll free number where anonymous disclosure is an option. The Ethics Hotline Services provided by Whistle Blowers Pty Ltd plays a pivotal role

in the Company's risk management and legal compliance program. All calls to these numbers are made to an independent third party with specialist knowledge and experience in dealing with calls of this nature and all information is treated as strictly confidential. The anonymity of all callers is guaranteed. The hotline number is tested regularly to ensure service availability. All calls to the hotline numbers were monitored and no incidents were reported through the Ethics Hotline Services in 2023.

The Company will not tolerate any form of retribution or victimisation against those who speak out against violations of the Code of Ethical Conduct and Responsible Supply Chain Policy and all stakeholders (supplier, customer, employees, local citizens, etc.) are urged to report any instances of victimisation to the Chief Compliance Officer, the Audit Committee or on the Company toll free numbers.

In addition, a Grievance Process for all internal employees and both internal and external stakeholders is available and is managed by the Community Development Department through its Community Liaison and Grievance Officer.

Stakeholders can also utilise the Responsible Minerals Initiative (RMI) Grievance Mechanism to raise concerns about ABM's operations since ABM is a member of RMI. The Grievance Mechanism is located on the RMI web site.

Grievances, whatever their source or routing, are documented, reviewed and dealt with as needed

Due Diligence

The Company's due diligence management policies and procedures consistent with the OECD Due Diligence Guidance, and responsible business conduct is embedded in our policies, procedures, risk management system and throughout our governance structures.

As part of the Company's supplier onboarding requirements, suppliers are required to complete and sign a Vendor Application, a Due Diligence Questionnaire, Certificate of Anti-corruption Compliance, General Terms and Conditions of Purchase contract and the ABM Responsible Supply Chain Policy. Once these documents have been completed, they are reviewed and if all is in order the supplier is approved.

The Company will immediately suspend or discontinue engagement with upstream suppliers or downstream customers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses, inclusive of forced or child labour.

The Company is committed to ensuring that sound and effective systems of internal control and enterprise risk management are developed, embedded, implemented and consistently reviewed throughout the organisation. To achieve this commitment, the Company has implemented a Risk Management Framework with associated systems and controls. The ABM Managing Director is responsible for communicating identified risks to the senior management team.

Alphamin uses a reporting framework and template which includes the following aspects:

- Risk category/cluster
- Description of the risk
- Discussion on the context of the risk
- Discussion on the business implications of the risk
- Review of the current controls
- Evaluation of the efficiency of the controls
- Evaluation of impact and likelihood
- Overall rating
- Risk Mitigation measures
- Action plan and risk mitigation strategies with specific responsibility.

The above approach is executed in terms of the Company's social and labour risks, which are effectively managed through the implementation of community development initiatives and monitoring systems.

To achieve the Company's social commitments, the Community Development department prioritises and organises its work according to the social management system (SMS) the Company has developed, ensuring that formalised strategies, policies, procedures, processes, and tools are in place to manage and prevent social impacts to communities, to uphold fundamental human rights, and to respect cultures, customs, and values while engaging in open and inclusive dialogue with communities, employees, and others who are affected by mine's activities.

The Company's Social Performance Commitments are managed according to the following key indicators:

- Identify, assess and systematically mitigate / manage all social responsibility
- Manage, monitor and control any grievances or issues
- Respect each peoples' culture and promote effective communication
- Maintain open and enduring relationships with traditional leaders, community leaders and management
- Respect the rights of individuals, communities and stakeholders and contribute to social and economic development within localities
- Engage and consult proactively with communities throughout the life of the project
- Recognise the value of cultural heritage and cultural diversity, and protect cultural sites
- Identify and support the development of sustainable and capacity building social projects within communities, with a focus on education, health and alternative livelihoods
- Avoid involuntary resettlement wherever possible, but if unavoidable proceed in line with IFC Performance Standards on Land Acquisition and Involuntary Resettlement

Although child labour was common in the geographical location, namely Walikale district of the DRC, and thus carry an inherent risk of this occurring within the area in which the mine operates, the Company has implemented robust Human Resources processes and controls to mitigate the risk

Measures implemented within the year ended December, 31 2023

During the fiscal year ended December 31, 2023, the Company took the following steps to mitigate, prevent and reduce the risks of forced labour and child labour in our operations and supply chains:

- Continued implementation and monitoring of Code of Ethical Conduct and Human Rights Policy compliance, including the Company's zero-tolerance approach to bribery, corruption, modern slavery, child labour and any illegal or conflict financing
- Continued implementation and monitoring of supplier due diligence processes, including the use of contractual clauses prohibiting the use of forced and/or child labour
- Not engaging with suppliers where red flags are identified through the Company's due diligence processes
- Prioritising and focusing due diligence efforts on most severe risks in accordance with the Company's risk management framework
- Enforcement of the Company's Responsible Supply Chain Policy, with both internal and external stakeholders
- Training on both OECD Guidance on due diligence and FCPA anti-bribery and corruption training conducted in FY2023
- Continued implementation and monitoring of various social commitments, with the Company ensuring adherence to its processes and due diligence requirements through management by its Community Development Department, including:

- Continued support of the Lowa Alliance, a non-profit organisation that implements projects outlined in a protocol agreement signed in 2015 between communities of Walikale and the Company's DRC subsidiary over the life of the mine. This is a moral obligation the Company is using to ensure and perpetuate social and voluntary projects.
- The roll-out of various Commitments Register projects as periodic commitments negotiated between the holder of the mining title and local communities affected by the mining project. Its objective is to guide and organise the implementation of the holders of mining rights commitments relating to the construction of socio-economic infrastructures and social services for the benefit of beneficiary communities impacted by its mining activities.

The Commitments Register serves as a framework agreement to allow the realisation of sustainable development actions aimed at improving the economic, social, and cultural well-being of local communities affected by the mining project both during and after mining.

- Required contributions to the basket fund through a specialised organisation established by the DRC Ministry of Mines, Ministry of Social Affairs, based on the DRC Mining Code and Regulations as amended and stipulating that the holder of mining exploitation rights or authorisation to exploit permanent quarries is required to constitute an endowment for contribution to community development projects, the minimum amount of which is equal to 0.3% of the turnover of the financial year during which it is constituted.

Management of the department's key deliverables further includes:

- Active and ongoing communication with internal and external stakeholders around ABM's Human Rights Policy Statement, including training and raising of awareness;
- Regular and substantive engagement with affected or potentially affected stakeholders, including vulnerable groups, as a primary means of identifying and addressing negative impacts;
- Cross-departmental collaboration in determining, preventing and mitigating salient risks;
- Management coordination and oversight of ABM's human rights-related activities in the form of a senior-level Human Rights Working Group, which invites key contractors to participate in Working Group meetings and activities;
- Establishment of an effective Grievance Mechanism for both internal and external stakeholders; and
- A commitment to investigate urgently any credible allegations of human rights abuses and act as appropriate, including remediation and/or referral to the relevant authorities.

The Company has assessed the risk of both forced labour and child labour within its own workforce as low, due to its zero-tolerance policy with respect to the above. Community initiatives are monitored closely to ensure the Company's policies are adhered to, and the various grievance mechanisms implemented for stakeholders were effectively managed during FY2023.

There was no forced labour or child labour during the fiscal year, and thus no remediation measures were undertaken during the year ended December 31, 2023.

There was no focused training provided to employees on forced labour and child labour during the year ended December 31, 2023. However, it is noted that there is no risk of this occurring in the workforce due to the Company zero-tolerance approach and is covered by the Company's Human Rights Policy which is included in the onboarding pack and annual compliance renewals. Training was conducted as part of community development initiatives to community stakeholders.

There were no measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply

chains. These were addressed in prior periods, and sustainable development is ongoing through the community development initiatives outlined within this report.

The Company did not have a formal process in place during the fiscal year ended December 31, 2023 for assessing the Company's effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains, although a formal assessment process may be considered in the future.

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 the entity or entities listed above. 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

DATED this 31st day of May, 2024

APPROVED BY THE BOARD OF DIRECTORS

(signed) "Charles Needham"

Charles Needham, Chairman
I have authority to bind
Alphamin Resources Corp.