

Thyssen Mining Construction of Canada Ltd.

Slavery and Human Trafficking Report

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”). This Report is made on behalf of Thyssen Mining Construction of Canada Ltd. (“Thyssen” or the “Company”).

Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a Canadian underground mining construction company, Thyssen recognizes the important role that we have in ensuring that our operations, which are predominately in North America, and the supply chains that support our operations, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps taken during fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Thyssen or of goods imported into Canada by Thyssen or third parties supplying Thyssen.

Our business

Thyssen is an underground mining contractor with offices in Regina Saskatchewan and Sudbury Ontario. Thyssen’s supply chain includes businesses that supply goods and services to our organization, primarily encompassing various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for our operations.

In total, we procure goods and services from approximately 350 approved suppliers and contractors. The suppliers and contractors Thyssen engages with include businesses that are primarily local to our operations, and adhere to regulations in Canada for oil and gas production which are among the highest standards in the world.

Organizational structure

Thyssen Mining Construction of Canada Ltd. is parent company to the following operating entities:

- Thyssen Mining Inc., a US based subsidiary
- CMAC – Thyssen Mining Group Inc., a corporation organized in Quebec.

Combined all Thyssen entities have approximately 1700 employees in Canada and United States.

Policies on slavery and human trafficking

Thyssen is predominantly a North American business that runs day-to-day operations in a consistent manner with a clear focus on proper governance of the business. Our Business Code of Conduct applies to all parts of Thyssen’s organization and it also contains details how to report potential



breaches of the Business Code of Conduct to the Privacy Officer of Thyssen anonymously. All staff are trained to perform in accordance with the Business Code of Conduct.

Slavery and trafficking are prohibited in most national legislations and Thyssen complies with applicable legislations in the countries where it operates. We adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain.

Together, these principles and documents describe the standards of business conduct and key compliances that apply to our interactions with each other as employees, business partners and suppliers. These policies help ensure that Thyssen conducts business in an ethical and responsible manner and that human trafficking and modern slavery do not occur within the organization.

Thyssen expects all employees to be treated with respect, and to treat others with respect. We have put in place various employee programs to assist with wellbeing, including the employee and family assistance program, and the Respect in the Workplace Policy.

Thyssen's supply chain management personnel operate at a level befitting a mining contractor, following internal material standards for sourcing, procurement and selection of suppliers and business partners. Our New Vendor processes define how new suppliers are approved, and each individual business unit is responsible for ensuring that suppliers are operating to our standards. We follow this process to eliminate any potential negative impacts.

Under the confidential privacy officer reporting, we have provided anyone with the ability to anonymously report any concerns about any wrongdoing or breaches of law. They are encouraged to raise them through email in confidence and without fear of disciplinary action or retaliation, through this policy.

Risk Assessment

Based on the evaluation of the vendors, relevant policies and procedures, and jurisdictions of operations, Thyssen has concluded that the risk of forced labour or child labour in the supply chain is extremely low. Continued monitoring and the development of additional screening procedures will ensure that the supply chain remains free of forced labour or child labour.

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.



Colin Wilson
CEO
Thyssen Mining Construction of Canada Ltd.

