

**MOUNTAIN PROVINCE DIMAONDS**

**Reporting Year: December 31<sup>st</sup> 2024.**

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## **Introduction:**

Prepared by Mountain Province Diamonds Inc. (“Mountain Province”) (Business Number: 10377 9021), this report is submitted in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and pertains to the financial year ending December 31, 2024.

Mountain Province qualifies as an entity under the Act, maintaining operations and meeting prescribed thresholds for revenue, assets and import and distribution activities within Canada. Mountain Province is also listed on a stock exchange in Canada. In keeping with commitments to ethical business practices and integrity throughout all Mountain Province operations, this report details the steps Mountain Province has taken during the reporting year to evaluate and address the risks of forced and child labour within its supply chains.

## **Section A – Structure, Activities, and Supply Chains**

For the reporting year ending December 31, 2024, Mountain Province operated as a Canadian diamond company that is fully Canadian owned and operated. Mountain Province is a 49% owner of the Gahcho Kué diamond mine, located in the Northwest Territories of Canada.

In 1992, Mountain Province Diamonds acquired a 100% interest in the mineral properties upon which the Gahcho Kué diamond mine is situated. During 2002, the Company entered the Gahcho Kué Joint Venture Agreement with De Beers Canada Inc. (“De Beers”) The original Gahcho Kué Joint Venture Agreement was amended and restated in July 2009, establishing Mountain Province Diamonds’ ownership interest at 49% of the Gahcho Kué diamond mine and De Beers’ at 51%.

Mountain Province does not participate in the day-to-day operations of the Gahcho Kué mine. These operations are fully managed by our trusted partner, De Beers. We rely on De Beers to oversee the mine’s supply chain and to uphold high standards concerning forced and child labour. De Beers is committed to maintaining the integrity of its supply chain and has implemented measures to reduce the risk of such labour practices.

In addition to the Gahcho Kué mine, a portion of our supply chain involves sending our uncut diamonds to India for cleaning and sorting. Mountain Province works with an industry-leading service provider to clean and classify our diamonds in India. This service provider is certified as compliant with the labour practice requirements of the Responsible Jewelry Council and confirms to be in compliance with the World Diamond Council’s, System of Warranties, and has a Human Rights policy, which includes a commitment that the minimum age of employment is eighteen, and that forced or involuntary labour is not practiced in any form, at any of its facilities.

## Section B – Policies and Due Diligence Processes

During the reporting year ending December 31, 2024, Mountain Province initiated a process to identify potential risks of forced labour and child labour within its supply chain. This process has been further detailed in Section C and demonstrates Mountain Province’s commitment to ethical sourcing.

Mountain Province is dependent on De Beers Canada to run the supply chain for its mining operations as the outsourced operator of the mine. De Beers Canada as a member of De Beers Group (and its parent Anglo American plc) has taken a suite of specific actions to prevent forced and child labour including:

- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour
- Developing and implementing anti-forced labour and/or child labour contractual clauses
- Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Complying with the De Beers Best Practice Principles requirements, which establish standards relating to Environmental, Social and Governance risks in the diamond value chain, including best practice expectations relating to human rights, forced labour and child labour.
- De Beers Canada Inc. has been certified 4 times against the Responsible Jewelry Council standards, which also include standards relating to Forced Labour, Child Labour, and Supply Chain due diligence.

## Section C – Forced Labour and Child Labour Risks

During the reporting year ending December 31, 2024, Mountain Province initiated a process to identify potential risks of forced labour and child labour within its supply chain. This process drew upon international sources, including the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and the U.S. Department of Labor’s List of Goods Produced by Child Labor or Forced Labor. Through this assessment, Mountain Province identified country- and product-based risk factors relevant to its sourcing activities.

The identification of these risks does not indicate the presence of forced or child labour within Mountain Province’s supply chain. Rather, the purpose of this initiative was to proactively identify potential areas of exposure and support the implementation of future risk mitigation strategies. Mountain Province acknowledges that no industry is entirely immune to the risks of forced and child labour, particularly in sectors or jurisdictions with weaker regulatory frameworks or enforcement.

The company’s risk assessment approach incorporated a geographic analysis using the Walk Free Global Slavery Index to identify higher-risk sourcing regions, alongside a product-level review of goods commonly

associated with forced or child labour. These efforts enabled a more targeted and informed risk management process.

#### Risk Assessment Findings:

As part of our assessment of key risk areas, Mountain Province recognises that India, where our diamonds are cleaned and sorted, has comparatively elevated risks of forced and child labour, identified in certain specific sectors and commodities but these are not flagged as being in the diamond cleaning and sorting sector. However, given the location of these services, as underscored by the Walk Free Global Slavery Index, which indicates a heightened risk of modern slavery in India, we remain vigilant in relation to the business we conduct there. To further understand potential vulnerabilities in our supply chain, Mountain Province also consulted the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

### **Section D – Remediation Measures**

During the reporting year ending December 31, 2024, Mountain Province did not identify any instances of forced labour or child labour within its supply chain. As a result, no remediation measures were required during the reporting period.

Consistent with the United Nations Guiding Principles on Business and Human Rights, Mountain Province acknowledges the importance of having clear remediation strategies in place. Should any instance of forced or child labour be identified in the future, Mountain Province is committed to taking prompt and appropriate corrective action to address the issue and mitigate its impact.

### **Section E – Remediation of Loss of Income**

During the reporting year ending December 31, 2024, Mountain Province did not identify any instances of forced labour or child labour within its supply chains. Accordingly, no measures were required to remediate loss of income for any affected individuals.

Mountain Province acknowledges the importance of being prepared to address such impacts should they arise. If forced or child labour is identified in future supply chain operations, Mountain Province is committed to responding in a manner that includes appropriate consideration of the needs and rights of affected individuals and ultimately will cease to do business with any organisation that indulges in unacceptable business practice.

## **Section F – Training**

During the reporting year ending December 31, 2024, Mountain Province did not provide specialized training to staff on the identification or mitigation of forced labour or child labour risks within its supply chain.

Currently De Beers, who is responsible for the mine operations, provides mandatory training in forced labour and/or child labour to any staff who are responsible for making contracting or purchasing decisions. As no instances of forced or child labour were identified during the reporting year, targeted training was not deemed necessary for Mountain Province staff. However, Mountain Province recognizes the importance of workforce awareness in addressing supply chain risks and remains open to considering training initiatives should the risk level increase in future assessments.

## **Section G – Assessing Effectiveness**

During the reporting year ending December 31, 2024, Mountain Province did not establish formal policies or operating procedures to codify its efforts to detect and prevent the use of forced labour or child labour within its supply chains.

Mountain Province remains committed to strengthening its monitoring practices. Post year-end, the company is considering the potential engagement of an external third party to independently evaluate the effectiveness of its supply chain oversight.



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## Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in this report for the entity 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 ending December 31, 2024.

I have the authority to bind Mountain Province Diamonds Inc.

A handwritten signature in blue ink, appearing to read "S Thomas".

Steven Thomas

CFO