



# 2024 Modern Slavery Report

Redpath Mining Inc.  
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## 1.0 INTRODUCTION

This Modern Slavery Report is published by Redpath Mining Inc. ("Redpath" or the "Corporation") on behalf of its subsidiaries in Canada for the fiscal year ending December 31, 2024 ("Reporting Period"). These subsidiaries include:

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

This report summarizes actions taken by Redpath to address and mitigate risks associated with forced labour and child labour, in line with Canada's 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 that guides all our operations. We mandate and prioritize human rights adherence in our business practices and expect our partners to uphold the same standards. Redpath has been a signatory to the United Nations Global Compact since 2017.

In 2024, Redpath:

- Strengthened mandatory global training with an enhanced focus on Modern Slavery.
- Implemented rigorous supplier onboarding processes with detailed modern slavery compliance checks.
- Initiated the integration of sophisticated third-party tools to effectively evaluate and monitor suppliers.

## 3.0 STRUCTURE ACTIVITIES, AND SUPPLY CHAINS

Headquartered in North Bay, Ontario, Redpath Mining Inc. provides a comprehensive array of underground mining infrastructure services globally. Our extensive operations encompass 12 countries across six continents, with 94 projects, in 65 different sites for 54 clients, including Mine Development, Shaft Sinking, Production Mining, and specialized services. As of 2025, the Corporation employed approximately 9,000 people globally and consistently applied rigorous

supplier management and due diligence procedures to mitigate risks of modern slavery within supply chains.

Redpath maintains active business relationships with a total of 3,541 suppliers globally, distributed across key Business Units (BUs) as follows: Africa (376), Australia (1,558), Europe (858), and the Americas including Canada (1437), Canada on its own has (749) suppliers registered. Each of these suppliers has been issued a Modern Slavery Supplier Due Diligence questionnaire. The process to collect responses from all suppliers is ongoing, with reminders issued and follow-up procedures in place. Suppliers that fail to respond or are deemed high risk may be subject to further review or deactivation in accordance with Redpath's compliance protocols.

## 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). Redpath remains firmly committed to respecting human rights by prohibiting forced labour, child labour, workplace harassment, discrimination, and abuse.

### 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 \(redpathmining.com\)](#).

Child Labour Provisions, Fair labour provisions and Forced Labour Provisions:

**REDPATH**

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Safety – First, Last and Always

- 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. In 2024, Redpath continued enhancing supplier due diligence practices, notably by rationalizing supplier bases across key regions such as Australia and Africa. Comprehensive Modern Slavery questionnaires have become essential in supplier onboarding, complemented by rigorous and updated contractual provisions designed to ensure ongoing compliance and facilitate proactive management of potential risks.

Redpath assesses these responses and engages in dialogue with the supplier to set corrective action, if areas of improvement are identified.

In addition, the European BU has implemented and integrated a due diligence system of suppliers and our Australian and Americas BU will follow this process prior to the end of 2025.

#### **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 applies robust risk assessment methodologies by distributing detailed questionnaires globally, notably across Africa, Australia, and the Americas, and implementing advanced supplier monitoring systems for real-time oversight, scheduled for full deployment by the end of 2025.

## 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, comprehensive training, including Modern Slavery, reached 1,288 employees globally, utilizing digital platforms totaling 2,207 hours, reinforcing mandatory annual compliance across business units. During 2025 this number is set to increase with the addition of the training and deployment of Compliance Champions on projects, and Short Compliance messages including Modern Slavery to all Redpath employees.

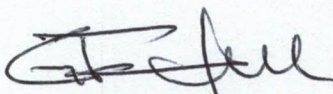
## 8.0 ASSESSING EFFECTIVENESS

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

George Flumerfelt Chief Executive Officer - Director of Redpath Inc. Date: May 29th, 2025