

THOR EXPLORATIONS LTD



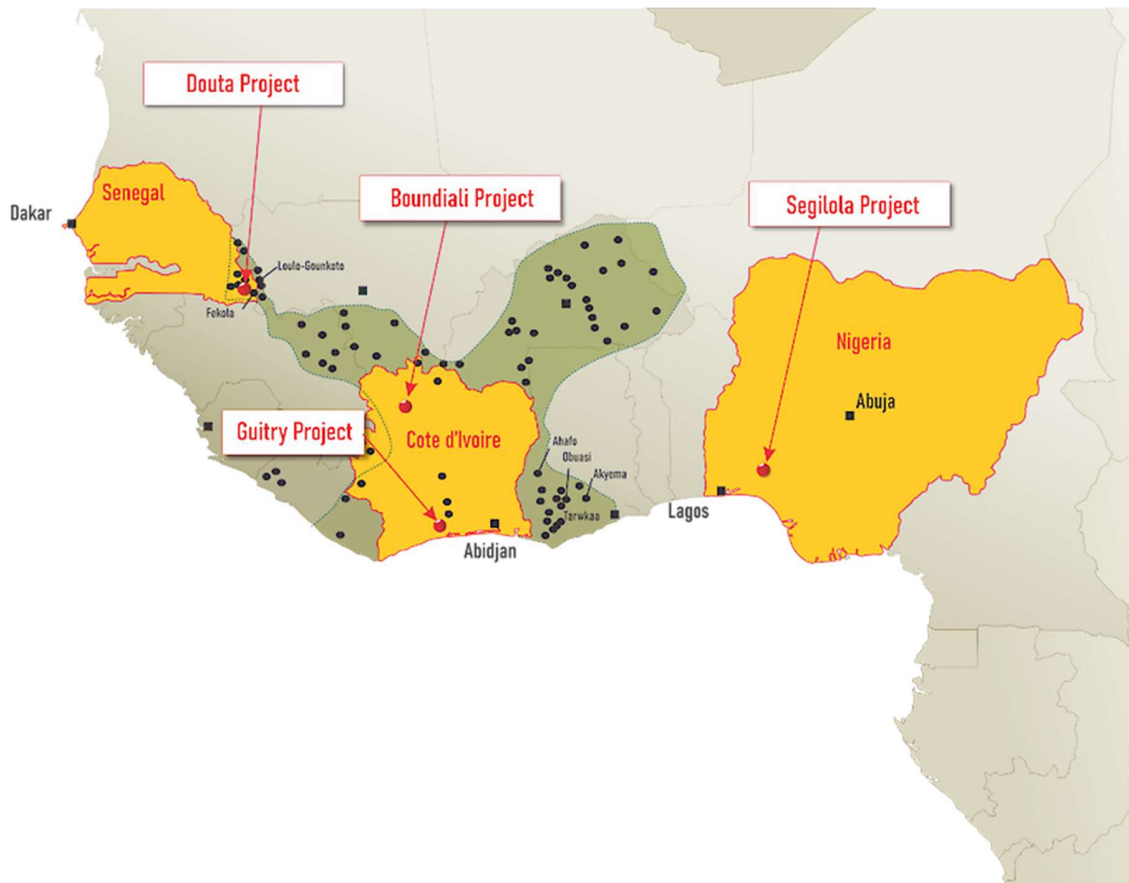
2024 Annual report on Activities to Prevent and Reduce Risk of Forced Labour or Child Labour in Supply Chain

Thor Explorations Ltd.

May 2025

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1. About this Report

This report relates to the financial year ending December 31, 2024. It is published by Thor Explorations Ltd. (“Thor”) in compliance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and the *UK Modern Slavery Act 2015*. The Report is a joint report prepared on behalf of Thor and its wholly owned subsidiaries: Thor Investments (BVI) Ltd., African Star Resources Incorporated, Segilola Resources Incorporated, Thor Gold Ventures Ltd, African Star Resources SARL, Argento Exploration BF SARL, AFC Constelor Panafrican Resources SARL, Segilola Resources Operating Limited, Segilola Gold Limited, Newstar Minerals Limited, Enorm Mining Limited, Ngnira Gold SARL.

The subsidiaries of the Company are as follows:

Company	Location	Incorporated	Interest	Functional currency
Thor Investments (BVI) Ltd. (“Thor BVI”)	British Virgin Islands	September 30, 2011	100%	USD
African Star Resources Incorporated (“African Star”)	British Virgin Islands	September 30, 2011	100%	GBP
Segilola Resources Incorporated (“SR BVI”)	British Virgin Islands	March 10, 2020	100%	USD
Thor Gold Ventures Ltd (“THX GV”)	United Kingdom	February 11, 2023	100%	GBP
African Star Resources SARL (“African Star SARL”)	Senegal	July 14, 2011	100%	CFA
Argento Exploration BF SARL (“Argento BF SARL”)	Burkina Faso	September 15, 2010	100%	CFA
AFC Constelor Panafrican Resources SARL (“AFC Constelor SARL”)	Burkina Faso	December 9, 2011	100%	CFA
Segilola Resources Operating Limited (“SROL”)	Nigeria	August 18, 2016	100%	USD
Segilola Gold Limited (“SGL”)	Nigeria	August 18, 2016	100%	NGN
Newstar Minerals Limited (“Newstar”)	Nigeria	July 5, 2022	100%	USD
Enorm Mining Limited (“Enorm”)	Nigeria	August 20, 2023	51%	USD
Ngnira Gold SARL (“Ngnira”)	Cote D’Ivoire	April 22, 2023	100%	USD

This report details the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used in its activities or supply chain.

References in this report to “company”, “corporation”, “we”, “our” and similar terms are to Thor. All dollar figures in this report are the U.S. dollars.

This report reflects our commitment for respecting human rights and combating modern slavery and human trafficking in all its forms. It includes the policies, programs and actions we have implemented or are developing in order to address modern slavery risks in our own operations and our supply chain during the reporting period. We remain committed to open and transparent reporting in both our progress and the challenges we face in this area.

2. Preventing And Reducing Risks of Forced Labour and Child Labour

During our last financial year, we have taken the following steps to prevent and reduce the risk that forced labour or child labour be used in our activities and supply chain:

- Mapping activities;
- Conducting an internal assessment of risks; and
- Implementing due diligence policies and processes for identifying addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.

This report describes the above actions.

3. Organizational Structure, Activities and Supply Chain

Thor is registered in BC, Canada under Company No. BC0860183 and listed on the TSX Venture Exchange (TSX-V) and AIM Market of the London Stock Exchange (AIM). The head office of the company is located at 4th Floor, 32 Wigmore Street, London, W1U 2RP and its registered office is located at Suite 2900, 550 Burrard Street, Vancouver, BC, Canada, V6C 0A3.

Thor's highest governance body is the Board of Directors with all directors being elected annually at its annual shareholder meetings. In its role as a steward of the company's assets and affairs, the Board responsibilities include:

- Setting the governance structure of the company through its charters and policies
- Overseeing the execution of company's strategic plan
- Reviewing and approving operating plans and budgets
- Identifying principal business risks and ensuring mitigation plans are in place
- Succession planning and assessment of senior management
- Ensuring effective communication with all stakeholders
- Adhering to all laws and regulatory disclosure requirements
- Providing a stewardship of financial affairs

In order to fulfill its duties, the Board has established the following Board Committees: Audit Committee, Remuneration and Nomination Committee and Technical Committee. For further details on corporate governance, please refer to our website: [Thor Explorations Ltd. | Corporate Governance](#)

Thor's main assets include its flagship producing Segilola open pit gold mine in Nigeria and the advanced exploration project, Douta, in Senegal. In 2024, the Segilola Gold Mine in Nigeria produced 84,965 ounces of gold and employed about 1,700 people (as of December 31, 2024), with 98% of the workforce being Nigerian and 81% subcontractor staff. The company has a growing portfolio of prospective exploration licences on the unexplored Ilesha schist belt in near proximity to the Segilola gold mine and further

exploration licences in Nigeria, and acquired (via joint venture) two additional Exploration Licences (ELs) in Senegal adjoining and near its Douta EL. Thor has 66 staff in Senegal located in a country office in Dakar and an exploration camp on the Douta EL. In 2024 Thor attained three Exploration Licences in Cote D'Ivoire totalling 1183 km². Exploration activities on these licenses are expected in 2025. Three office-based staff are in Abidjan.

On Thor's only operating mine (Segilola Gold Mine) the supply chain consisted of 378 main Tier 1, 756 Tier 2 and 2,268 Tier 3 suppliers and contractors with global footprint in 2024. Key supply chains include:

- Asia: Equipment and process plant parts, chemicals, and expertise.
- European Union: Hazardous chemicals, vehicles, and specialist equipment
- Switzerland: Gold refining and purification.
- West Africa: Non-hazardous materials, mining expertise, and exploration drilling.
- Nigeria: Fuel, food, camp supplies, project staff, and professional services.
- North America: Legal, financial, and mining expertise.
- United Kingdom: Professional, financial, and public relations services.
- Australia: Mining and geology expertise.

Out of all Tier 1 suppliers and contractors, the company has identified that about 14% are key to its operations thus concentrating its due diligence efforts within that group. The company has no real visibility into the activities of its Tier 2 and Tier 3 vendors.

4. Policies and Due Diligence Processes

Thor is governed by and complies with Canadian and UK labour laws, which strictly forbids the use of all forms of modern slavery and child labour. Thor has also mapped its activities and determined that purchasing and using goods and services for its operations could potentially represent a risk that forced labour or child labour be used in its supply chain. These activities were added as a risk in the specific operation's risk register.

In 2022, the Board adopted a set of governing policies, which are now integrated into the business activities of the company. Notably, Thor's **Business Conduct and Ethics Policy** ([thor_group_business_conduct_ethics_policy_august_2022.pdf](#)) ensures that all its directors, officers, employees and other individuals representing the company maintain the highest standards, professional conduct and ethics in its business activities including complying with all applicable legal and regulatory requirements.

Our **Human Resources Policy** ([thor_group_human_resources_august_2022.pdf](#)) is fundamental in setting a constructive worker-employer relationship by treating the workers fairly and providing them with safe

and healthy working conditions. It strictly stipulates the avoidance of the use of forced labor, as well as compliance with national employment, labor laws and relevant international guidelines.

The company also introduced **Human Rights Policy** ([thor_group_human_rights_policy_august_2022.pdf](#)), which stipulates Thor's commitment to respecting human rights and support of the Universal Declaration of Human Rights and the United Nations' Guiding Principles on Business and Human Rights.

In addition, we adopted **Supplier Code of Conduct** ([thor_group_supplier_code_august_2022.pdf](#)) which seeks to multiply the positive impact of the corporation on local, regional and national economies. Suppliers are required to understand and support Thor's values in their business dealings with or on behalf of Thor. The code specifically outlines Thor's supplier due diligence and indicates expectations for compliance with Labour Rights. Thor expects its suppliers to respect workers' rights to safe working conditions, fair remuneration and work time and to prohibit the use of child labour and all forms of modern slavery, amongst other fundamental rights, by complying with applicable labour legislations and all Thor policies on this subject.

Similarly, our **Procurement Policy** ([thor_group_procurement_policy_august_2022.pdf](#)) stipulates our commitment for avoiding the procurement of goods and services from suppliers where potential risks of child labour, forced labour or of instances of modern slavery have been identified.

5. Risk Assessment & Remediation Measures

We understand that it is highly unlikely that any sector or industry that involves the production of a good will be free of child and forced labour risks, due to the complex and diverse nature of global supply chains. This is especially true for the mining industry where conflict minerals in many areas around the globe use forced or informal labour. In addition, Nigeria is among countries identified with protracted conflicts and have some of the highest overall vulnerability to modern slavery, and relatedly, a high prevalence of modern slavery. Women and children are particularly vulnerable to modern slavery in conflict. Armed groups also use modern slavery and related abuses as weapons in conflict. In the past few years, many African countries, including Nigeria, have taken actions to improve their response to modern slavery. Despite these efforts, Nigeria remains among the African countries with the highest prevalence of modern slavery and Senegal ranking at the lower range¹.

To manage the direct impact of its own operations, Thor has enforced strict policies against the employment of child or forced labour. To this end and as mentioned in the above Structure, Activities and Supply Chains section of this report, we have gone through the process of mapping out our top 53 direct suppliers in 2024. As operators of the first legal gold mine in Nigeria, we have implemented strict security rules including no persons under the age of 18 can be present on site. Whilst we have confidence that there is no risk of child and forced labour at the Segilola mine, but it is possible that higher risks exist in

¹ Source: <https://www.walkfree.org/resources/>

the supply chain particularly in the use of local contractors near the Segilola mine or remote jurisdictions where equipment is manufactured.

Thor has established a process through which to monitor the performance of suppliers in higher-risk categories. The company sends out annual environmental and social assessment surveys to its key suppliers. In 2024, 53 of the Tier 1 suppliers were contacted for due diligence information.

A whistleblowing hotline exists to allow issues to be lodged confidentially or by email. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to use the following toll-free numbers in UK or Nigeria. Complaints may also be submitted confidentially via e-mail: thorexpl@integritycounts.ca or through Thor's dedicated web portal: <https://www.integritycounts.ca/org/thorexpl>.

To date, the company has not received any community-related or supplier-related grievances, nor any grievances related to incidences of child or forced labour. As a result, no specific remedy was provided. If instances of child or forced labour were identified, the company would anticipate 1) documenting the grievance through the Grievance Reporting Channel, 2) commencing an investigation by dedicated personnel, 3) reviewing findings and an action plan from investigator and 4) completing such action plan including immediate legal actions.

With respect to the supply chain, the company is unaware of any use of forced or child labour by our direct suppliers or within our supplier's supply chains and therefore the company did not take any measures to remediate such incidences of forced or child labour in our supply chain. If instances of child or forced labour were identified, we would anticipate following the same remedy steps as above.

Thor has implemented contractual requirements: contracts issued for the Segilola project include clauses requiring compliance with Thor's policies and procedures, including the prohibition of forced labour and child labour. Subcontractors must also comply with the Segilola Health & Safety system (SROLSafe), participate in toolbox meetings, and undergo HSE audits and site inspections, which is also used for monitoring of compliance with the policies discussed above.

In addition, Thor has implemented the following:

- **Employment Policies:** Employment contracts stipulating minimum legal employment age of 18 years and include protections against unfair treatment, as well as promote a fair and inclusive workplace.
- **Recruitment Processes:** Thor's recruitment processes comply with relevant employment laws, including age verification to ensure no one under 18 is employed.
- **Security Measures:** Access to the Segilola Mine Site is restricted, with no children allowed on site.
- **Fair Compensation:** Employees pay and rewards are market-related and reviewed annually.
- **Wellbeing Initiatives:** Thor supports the physical and mental wellbeing of its employees through various initiatives.

6. Training

During 2024, the company did not specifically conduct any training courses for employees that cover modern slavery, forced labour or child labour. However, in order to build capacity and ensuring knowledge transfer among its employees, the company conducts training on a wide range of topics on a regular basis. In 2024, the company conducted 73 Human Resources related training programs. Training topics included:

- Compliance with labour laws and company policies
- Diversity, Equity, and Inclusion (DEI): Thor promotes a workplace free of barriers, bullying, and discrimination, in line with its Diversity Policy.
- Safety and Health: Employees receive training on workplace safety, home safety, and health programs.

All new employees and contractors are required to review and confirm their understanding of all corporate policies, including the Business Code of Ethics, Human Resources and Human Rights policies. These policies affirm the company's commitment to supporting and respecting all applicable laws, including laws upholding human rights and creating a workplace that is free of discrimination, harassment and violence.

Thor is also conducting regular workshops to educate local contractors on the requirements for bidding on contracts, emphasizing the importance of ethical labour practices and compliance with company policies.

7. Assessing the Effectiveness of Our Approach

The company is tracking the effectiveness of compliance with its policies through complaints filed through its grievance mechanisms, supplier questionnaires, as well as any fines and breaches. Thor has not been fined or prosecuted for breaches of environmental, health and safety, labour, human rights, anti-bribery, or tax regulations in any of its operating locations.

The Grievance Management Procedure (GMP) at Segilola Resources Operating Limited (SROL) demonstrates a commitment to addressing the negative impacts caused by the Segilola Mine Project. SROL facilitates stakeholder feedback through established communication channels, ensuring transparency and responsiveness. The GMP outlines a systematic approach for logging grievances, implementing corrective actions, and promptly communicating resolutions to complainants. By utilizing a Stakeholder Engagement Database and Grievance Database System, SROL monitors complaints to enhance performance and maintain a positive reputation. Regular reviews ensure effective remediation, if needed.

The company also tracks responses to its annual Supplier Environmental and Social Assessments sent to key suppliers and contractors.

Thor also complies with international mining industry initiatives, such as the Extractive Sector Transparency Measures Act (ESTMA) and the Extractive Industries Transparency Initiative (EITI) in Nigeria.

8. Attestation

This report has been approved by the Board of Directors of Thor Explorations Ltd. on May 27, 2025 pursuant to paragraph 11 (4)(b)(ii) of the Act and constitutes our report for the financial year ending December 31, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I, in the capacity of Chairman of Thor Explorations Ltd. including its subsidiaries, have reviewed the information contained in the report for Thor Explorations Ltd. 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.

I have the authority to bind Thor Explorations Ltd.



Adrian Coates

Board Chairman, Thor Explorations Ltd.

Date: May 28, 2025