



## **Forced Labour and Child Labour Report**

### **Introduction**

This Forced Labour and Child Labour Report (this “Report”) is submitted by Volt Carbon Technologies Inc. (“Volt”, “we”, “us” or “our”) for the financial year ending October 31, 2024 and is made in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9 (Canada), also known as the Modern Slavery Act (the “Act”).

This Report applies to, and describes the reasonable steps taken by, Volt to mitigate forced labour and child labour in our organization’s operations and supply chains. Volt is a junior resource company involved in the acquisition and exploration of property interests that are considered potential sites for future mining opportunities, as well as research and product development related to graphite processing. Volt is headquartered in Alberta, Canada.

### **Respect for Human Rights**

Volt fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour, including in our operations and our supply chain. Respect for human rights is fundamental to our values as a Company and to the wellbeing of the communities in which we operate.

As set out in the United Nations Guiding Principles on Business and Human Rights (“UNGPs”), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur; and (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

To do our part to advance the UNGPs and the objectives of the Act, in May 2024, we hired a full-time Human Resources employee to develop policies and practices aligned with the UNGPs. All staff completed training on the new program and policies in August 2024.

Volt is headquartered in Calgary, on the territories of Indigenous peoples, including the First Nations of Treaty 7 as well as other non-Treaty First Nations and Métis. We are committed to reconciliation.

### **Steps Taken During 2024 Financial Year to Prevent and Reduce Risk that Forced Labour and Child Labour are Used in Our Supply Chain**

Volt is committed to operating ethically, following practices, policies, and standards in compliance with the objectives of the Act and applicable labour and employment laws. As part of this commitment, we acknowledge the importance of considering modern slavery and child labour within our supply chains and activities.

During its 2024 financial year, Volt hired a full-time Human Resources employee who developed a robust company policy and staff training program on forced labour and child labour risk, prevention, and detection.

The comprehensive program we developed, which is utilized by all employees, consists of:

- A Modern Slavery Prevention Plan: *Volt Carbon Technologies Forced and Child Labour Prevention Plan* (June 2024)
- An Employee Training Program: *Fighting Against Forced Labour and Child Labour in our Supply Chain* (August 2024)
- *A New Vendor Questionnaire* – used to confirm the identity of all new suppliers, including details of their raw material supply chain.
- *A New Vendor Risk Assessment Tool* – used to evaluate vendor risk in relation to the Modern Slavery Prevention Plan. Vendors are categorized as low, medium, or high risk, or disqualified from engagement altogether.

In addition, pursuant to the implementation of the Modern Slavery Prevention Plan in 2024, all employees of Volt must validate their identity with government issued photo identification and provide their Social Insurance Number (SIN) number or, if applicable, work permit.

### **Corporate Structure, Activities and Supply**

#### Corporate Structure:

Volt is a corporation existing pursuant to the provisions of the *Business Corporations Act* (Alberta) (the “**BCA**”) and is extra-provincially registered to carry on business in the provinces of Saskatchewan, British Columbia and Quebec.

Volt, then named Torch River Mines Ltd., was incorporated on June 18, 1997, pursuant to the provisions of the BCA. On March 26, 2004, the Company amalgamated with Tael Capital Inc., in accordance with the BCA to form Torch River Resources Ltd. This amalgamation was the Company’s qualifying transaction for listing on the TSX Venture Exchange. On October 30, 2013, the Company changed its name from Torch River Resources Ltd. to Saint Jean Carbon Inc. On February 16, 2022, the Company announced a change of corporate name from “Saint Jean Carbon Inc.” to “Volt Carbon Technologies Inc.”.

Volt is a reporting issuer in Alberta and British Columbia. Volt’s shares are traded on the TSX Venture Exchange under the symbol “VCT” and are also traded in the United States on the OTC market under the symbol TORVF.

On May 27, 2021, Volt acquired all the issued and outstanding shares of Solid Ultrabattery Inc. (“**Solid**”), an Ontario company involved in the research and development of solid-state batteries.

Volt, and its subsidiary Solid, employ approximately 5 employees in Canada and no employees outside of Canada. Volt utilizes a limited number of contractors from time to time and employs university co-op students on a regular basis from the University of Waterloo and Guelph University to help train and provide experience for the students to be future employees.

#### Activities:

##### *Mineral Exploration and Development*

The mineral exploration and development segment of Volt focuses on the acquisition and exploration of property interests that are considered potential sites of economic mineralization. Volt continues to hold mineral rights to multiple historic molybdenum properties in British Columbia and a graphite property in Quebec.

##### *Research and Development*

Volt’s primary research is in development of its lithium-ion batteries, graphite separation products, battery anodes and graphene products. Volt is partnered with the University of Waterloo to develop its lithium-ion batteries. The research is performed primarily at the Guelph, Ontario location with support from the University of Waterloo.

Volt has proprietary technology consisting of an air classifier (the “Air Classifier”) that processes graphite bearing ore into high purity graphite. The Air Classifier is capable of processing and purifying graphite in small batches and is currently in the scale up phase. The process enables purification of graphite in a dry environment without the use of any water and reagents.

Volt obtains its graphite ore from Green Batteries Mineral Inc. located in Vancouver, British Columbia and E-Power Resources Inc. located in Montreal, Quebec.

In the course of its research and development initiatives, Volt purchases supplies such as scientific research materials, technical instruments and other parts from various suppliers around the world. Given the small scale of Volt’s operations, it does not import such supplies regularly and only makes purchases as needed to support its research and development activities.

#### Supply Chain and Operations

Volt is committed to complying with all applicable laws and regulations, including in respect of forced labour and child labour, and we expect our suppliers to demonstrate the same commitment in the regions in which they operate. We acknowledge the risk of forced labour and child labour existing in any complex supply chain.

Overall, during its 2024 financial year, Volt and its subsidiary Solid utilized approximately 221 suppliers, of which approximately 203 are in Canada, 10 are in the USA, 4 are in China and 4 are in Europe (United Kingdom, Germany). Compared to the 2023 fiscal year, the number of Canadian supplies used increased by 25, and the number of suppliers in foreign countries decreased.

Total procurement expenditure in the 2024 financial year for Volt and Solid was approximately \$2,082,900. Volt purchased approximately \$1,930,000 from Canadian suppliers, \$56,000 from USA suppliers, \$52,000 from suppliers based in Europe (United Kingdom, Germany) and \$44,930 from suppliers in China. Compared to the 2023 fiscal period, the value of purchases from Canada increased by 5%, and purchases from foreign countries, such as China decreased by 5%.

Volt has previously utilized a limited number of suppliers from China for one-time purchases. Historically, suppliers used from China have been referred to Volt on the recommendation of contacts at the University of Waterloo (our trusted technical advisors), or by referrals within the scientific community. Generally, our suppliers have been sourced or recommended through the Prospectors & Developers Association of Canada, an industry association providing assistance to the mineral exploration and development community.

#### Description of Products

Most of Volt’s procurement spend on the products and services procured by Volt in Canada are for professional fees such as lawyers, accountants, auditors, consultants or for regulatory filing fees, as well as rental payments for 2 work site locations and the utilities that correspond to these locations. Our suppliers in China provide laboratory machinery for battery fabrication such as glove boxes, battery testers and coin cell testers, and a small amount of chemicals required in battery fabrication such as lithium. Our suppliers in Europe (United Kingdom, Germany) supply primarily marketing and advertising services. Our suppliers in the USA provide chemicals used for battery fabrication, research supplies and some capital equipment, such as a low temperature battery testing chamber.

In 2024, Volt launched a new program to sell processed graphite through an online store hosted on its website. The initial product offering included limited quantities of large flake graphite, available in package sizes of up to 500 grams. As a result of the early stage of the program, only a small volume of graphite was sold to Canadian customers during the 2024 fiscal year.

## **Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

In June 2024, Volt created a formal modern slavery prevention policy to address the risk, prevention, and detection of forced labour and child labour in our supply chains and operations. The new policy was initiated in August 2024 when all staff were trained on the policy. This policy ensures that all current and future staff are trained, and that a thorough vetting process is in place for existing and future vendors to determine their risk level within their supply chain as it relates to UNGP.

Should a vendor be deemed low risk according to our risk assessment procedure, the vendor will continue to supply products and services to Volt and be re-evaluated for risk every 2 years. The purchasing manager will complete a risk assessment for all existing vendors and new vendors. New vendors will not be used until the risk assessment has been completed. The risk assessment is a comprehensive list of questions regarding the industry the vendor is in, the ability to validate the identities of its suppliers, the transparency of the vendors labour policy, their location of business and associated supply chain, transparency of the vendor's code of ethics, whether the vendor is unionized, whether the vendor is a public or private corporation, and the danger of the products or services such vendor suppliers.

A vendor with a medium risk score will be monitored diligently, will be required to provide detailed tracking of shipments, and will be re-evaluated each year for risk level.

Should a vendor be assessed to have a high-risk score, an alternate vendor must be found for the product or service. A high risk vendor will not be used as a Volt preferred supplier.

In 2024, 54 risk assessments were completed on vendors used by Volt. Most risk assessments determined the vendors to be low risk, some vendors were assessed as medium risk, and no vendors were assessed as high risk.

## **Risk Assessment and Management**

During the 2024 financial year, Volt formally assessed 54 vendors and service providers to identify any risk within their supply chain that may carry a risk of forced labour or child labour. Most risk assessments for our core vendors and suppliers scored low risk for forced labour or child labour within their supply chain. A few vendors scored medium risk and therefore will be re-assessed in 2025. There were no vendors that were evaluated to have high risk of forced or child labour.

We believe that our activities carry a lower risk of forced labour and child labour being utilized given the small size of our operations and because the graphite we process is obtained from sources located in Canada. However, we acknowledge that one of our largest risks of forced labour and child labour being used in our supply chains likely relates to the raw materials that our suppliers obtain and process into products used in our research and development business. We also acknowledge that our suppliers may source raw materials from jurisdictions that have a higher risk of forced labour and child labour.

Specifically, Volt has used one supplier based in China that provides cathode material to Volt that contains cobalt. Volt acknowledges that the supply of cobalt globally carries a high risk of forced labour and child labour being used in its production. In purchasing cathode material from this supplier and to manage this risk, Volt reviewed the supplier's Labour and Human Rights policy which contains a specific prohibition on the use of child labour.

Volt manages the risk of forced labour and child labour in its supply chains by using suppliers that are approved by the Prospectors & Developers Association of Canada or referred to Volt through the University of Waterloo or otherwise through the scientific community.

### **Forced Labour and Child Labour Remediation Measures**

During the 2024 financial year, we were not aware of any forced labour or child labour practices occurring within our supply chains and we believe that our supply chain presents a low risk of forced labour or child labour being utilized. Accordingly, we did not undertake any measures to remediate any forced labour or child labour.

### **Loss of Income - Remediation Measures**

During the 2024 financial year, we were not aware of any forced labour or child labour practices occurring within our supply chain and we believe that our supply chain presents a low risk of child labour or forced labour being utilized. Accordingly, we did not undertake any measures to remediate any loss of income relating to any forced labour or child labour.

### **Training of Employees**

A training program in the prevention of forced labour and child labour was developed by Volt Carbon in June 2024 and presented to all staff in August 2024. The training consisted of a 1.5-hour interactive education session with the following themes:

1. Understand outcomes and impacts of forced and child labour Internationally and in our industries
2. Volt's commitment to mitigate forced and child labour in our Supply Chain
3. New Volt Modern Slavery Prevention Policy and our Employee's responsibilities regarding our supply chain

During the training session, interactive exercises were incorporated to enhance employee understanding and highlight key risk considerations.

The training session included a review of the Volt's Policy on the prevention of forced and child labour. Staff received a presentation on the supply chain risk assessment tool, along with instructions on how to complete it. The purchasing manager retains responsibility for completing vendor risk assessments, but all staff were trained on how to evaluate vendors and identify relevant risks when sourcing.

### **Assessing Effectiveness**

Over the past year, Volt hired staff to develop a modern slavery prevention policy, design a training program, deliver training to employees, and implement the program by completing 54 vendor risk assessments. Volt has not yet evaluated the effectiveness of the policy or the risk assessment tool. To mitigate overall risk, Volt has prioritized reducing reliance on foreign vendors where possible. As a result, both foreign vendors spending, and the number of foreign vendors decreased by 5% in 2024. Most assessed vendors were classified as low risk, with a small number identified as medium risk. No vendors were assessed as high risk.

### **Approval of Board of Directors**

This Report has been approved by a written resolution of the Board of Directors of Volt, in accordance with Section 11(4)(a) of the Act stating:

"In accordance with Section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), Modern Slavery Report is here by authorized and approved."

"In accordance with Section 11(5)(b) of the Act, any one director or officer of the Corporation is hereby authorized and directed to do and perform all such acts and things and sign such documents as necessary to complete the filing of the Modern Slavery Act Report and the President of the Corporation is hereby authorized and directed to complete the attestation requirements of the Modern Slavery Report in accordance with the Act."

## **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.



Per:

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V-Bond Lee  
CEO, President and Chairman of the Board  
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May 16, 2025  
*I have the authority to bind Volt Carbon Technologies Inc.*

## **Forward Looking Information**

This report contains forward-looking information concerning Volt’s business and affairs. In certain cases, forward-looking statements can be identified by the use of words such as “plans”, “expects” or “does not expect”, “intends” “budget”, “scheduled”, “estimates”, “forecasts”, “anticipates” or variations of such words and phrases or state that certain actions, events or results “may”, “could”, “would”, “might” or “will be taken”, “occur” or “be achieved”.

These forward-looking statements are based on current expectations and are naturally subject to uncertainty and changes in circumstances that may cause actual results to differ materially due to any number of factors, including such variables as new information regarding potential mineral reserves, changes in demand for and commodity prices of graphite, molybdenum or any other commodity, legislative, environmental and other regulatory approval or political changes. Although Volt believes that the expectations represented in such forward-looking statements are reasonable, there can be no assurance that these expectations will prove to be correct. Such statements include our commitments and future compliance with applicable laws against exploitative practices of forced labour and child labour, our own modern slavery prevention policy, and our continued use of vendor risk assessments on our suppliers. Forward-looking statements involve significant risks and uncertainties, should not be read as guarantees of future performance or results, and will not necessarily be accurate indications of whether or not such results will be achieved. A number of factors could cause actual results to differ materially from the results discussed in the forward-looking statements. Any such forward-looking statements are expressly qualified in their entirety by this cautionary statement. Forward-looking information is provided as of the date of this Report and Volt assumes no obligation to update or revise them to reflect new events or circumstances, except as may be required under applicable securities legislation.