

Fighting Against Forced Labour and Child Labour in Supply Chains Act

FY2025 Report

Orano Canada Inc.

1. Introduction

Orano Canada Inc. (“Orano Canada”) created this report (the “Report”) pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) (the “Act”) for the financial year January 1, 2025 to December 31, 2025. It touches upon the risks of modern slavery in supply chains that Orano Canada’s operations and supply chains seek to mitigate and prevent. It also details the policies and procedures it has in place regarding risk management and compliance to assess and mitigate those risks.

Orano Group is ultimate the parent company and shareholder of Orano Canada. Orano Group is a Société anonyme, which is a public limited company in France and is the equivalent of a private corporation in Canada. It operates in the field of nuclear materials, and provides solutions to current and future challenges in the fields of nuclear energy and health. Orano Group has a presence in 17 countries with a total of 18,500 employees worldwide. Its revenue amounted to €5.1 billion for the year 2025.

Orano Group operates and is managed as an integrated group with overarching policies, systems, and processes that are required to be applied consistently across its global operations, which are in addition to any policies, systems, and processes that are implemented at the local level, such as at Orano Canada. However, this Report is limited to discussing Orano Canada’s local operations only and does not provide any guarantees or attestations on the supply chain operations or practices of Orano Group or any of its subsidiaries.

Orano Group is required to report on topics including human rights, labour practices, forced and child labour in the French context pursuant to France’s 2016 Sapin II law (“Sapin II”). Sapin II covers transparency, anti-corruption, and economic modernization. It also requires the subsidiaries of French parent companies, such as Orano Canada as a subsidiary of Orano Group, to comply with its requirements.

In addition to Sapin II, Orano Canada is required to comply with French Law No. 2017-399 of March 27, 2017, which addresses the duty of vigilance of parent companies and orders their international subsidiaries to also be subject to its requirements. Adhering to the requirements of this duty is an integral part of the Orano Group’s corporate culture. Orano Group requires Orano Canada to provide regular reporting on its processes that comply with the duty’s requirements, and it also conducts audits of those processes periodically to identify any deficiencies or gaps. Detailed information on the Orano Group’s compliance reporting is available at <https://www.orano.group/en>.

2. Orano Canada's Structure, Activities and Supply Chains in FY2025

Orano Canada is incorporated under the *Canada Business Corporation Act*. It is a wholly owned subsidiary of Orano Group and had an estimated 523 employees in 2025, with many being from northern communities. Its organizational structure consists of departmentation with a chain of command originating at the executive level. It has been a leader in the exploration, mining, and milling of Canadian uranium for over 60 years.

Our presence in Canada began with uranium exploration in the 1960s and the development of the Cluff Lake mine in the 1980s, and continued with mines and a mill at McClean Lake. Orano Canada is also a joint venture participant in several other sites in the Athabasca Basin operated by another company. As of 2025, Orano Canada's operations include uranium exploration, milling, and mining preparation activities. In 2024, with all decommissioning objective successfully met, the Cluff Lake property was transferred into the Province of Saskatchewan's Institutional Control Program for long term monitoring.

Orano Canada's supply chain management department oversees the sourcing and delivery of necessary goods and services for the operation of its mill, mining and exploration activities. In 2025, the department sourced materials from around 1,038 suppliers worldwide (including Canada), with an annual expenditure of approximately \$748,749,550.

Orano Canada procures a wide range of goods, materials and services. These include industrial equipment and machinery, personal protective equipment, chemicals, reagents, packaging materials, and other items and services essential for exploration and uranium mining and milling operations. We also source furniture, equipment, and consumables to support both camps and office-based activities. We prioritize local suppliers whenever possible, especially those in northern Saskatchewan, as outlined in our "Northern Content" policy.

In 2025, approximately 99% of our supply chain spending was directed to 933 suppliers within Canada (the remaining 1% of suppliers are located in the United States of America, France, China, and Australia). This represents an annual expenditure of approximately \$741,331,482. 24 of the 933 suppliers qualify as Northern Content providers, with an annual expenditure of approximately \$50,880,456.

3. The Act's Additional Reporting Criteria

Orano Canada operates under the Orano Group's global recruitment and employment framework (amended as necessary for the local law context), which requires background checks to be undertaken depending on role and location—including to verify that candidates and apprentices are at least 18 years of age. Orano Canada also bears the cost of pre-employment medical and background checks.

On-site contractors at Orano Canada's properties, including those who provide labour, are contractually required to adhere to all site safety procedures and the Orano Group's Code of Ethics, which contain requirements relating to the prevention of child labour, forced or compulsory labour, human trafficking and other breaches of labour and human rights.

Supply Chain Policies and Due Diligences Processes

Orano Canada has implemented a range of measures to assess and reduce the risk of forced and child labour within its supply chain. These measures include a requirement within our vendor prequalification process for prospective suppliers to confirm whether they maintain a policy or program to prevent forced and child labour, as well as a broader vendor questionnaire program designed to evaluate our current suppliers' practices and potential risk areas. In addition, our standard contract templates include clauses requiring suppliers to represent and warrant that their operations and supply chains are free from forced and child labour, and that they have taken reasonable steps to address these risks. Suppliers are also required to adhere to the Orano Group's Sustainable Development Declaration (the "Sustainable Development Declaration") and Code of Ethics, which reinforce our commitment to ethical business practices and the protection of human rights. Further details on these measures are provided in the sections below.

Orano Canada strictly applies its Code of Ethics to ensure the protection of human rights. Each Orano Canada employee is required to sign and comply with the Code of Ethics. As a condition of all contracts and purchase orders, all third parties, including our suppliers, agree to adhere to Orano Canada's Code of Ethics.

Other Due Diligence Processes

Orano Canada has developed and implemented policies and procedures for procuring goods and services to manage risk and ensure compliance with laws and regulations that are applicable to our operations. These policies and procedures include, but are not limited to, our Supply Chain Management Strategy, which adopts the Sustainable Development Declaration.

Orano Canada complies with all employment and labour laws and support international human rights conventions, including the *United Nations Universal Declaration of Human Rights*. We are dedicated to creating a work environment where everyone feels safe, respected, and free from harassment, violence, or discrimination, ensuring no one feels demeaned, humiliated, or threatened. We strive to foster a welcoming, equitable, and inclusive workplace, valuing the dignity and self-respect of every individual, and we expect the same standards from our suppliers and their employees.

Orano Canada's personnel involved in the vetting of new or renewed third party business relationships receive regular training on Orano compliance programs, including Orano's confidential whistleblowing procedures and the Orano Group whistleblowing platform. It enables both employees and non-employees, in strict confidence, to report in good faith behaviours or situations that appear contrary to the Orano Group's Code of Ethics or in breach of applicable law and regulations, such as suspected forced and child labour activities.

Supplier Selection

Prospective suppliers must undergo a pre-qualification process that includes collecting and verifying their company information, as well as acknowledging their commitment to and compliance with Orano Group's policies. For significant purchases, a thorough supplier review is conducted, which may involve a site visit by Orano Canada personnel to the supplier's

manufacturing site. Further, Orano Canada's supply chain contracts contain a compliance section that contains terms requiring suppliers to confirm their compliance with the Sustainable Development Declaration and Code of Ethics, which are available at <https://www.orano.group/en>.

The Sustainable Development Declaration is a sustainable development and continuous improvement initiative within the Orano Group. It asks all suppliers to participate in this initiative with regard to their own operations. Specifically, it requests that they respect human rights and labour standards, which includes forced and child labour.

The Code of Ethics describes the ethical rules to which the Orano Group and its subsidiaries adhere to in all circumstances. Similar to the Sustainable Development Declaration, the Code of Ethics contains a section discussing respect for human rights and other commitments and includes a prohibition on participating in human trafficking, forced and child labour. Such adherence is a result of external obligations (laws and regulations) or internal requirements. They apply to all of Orano Group's employees, suppliers, and partners.

Orano Canada's suppliers who operate in or source goods from countries that are flagged as being high-risk for forced and child labour are required to complete a due diligence questionnaire (the "Questionnaire") that addresses risks regarding those human rights concerns. The questions assess a supplier's:

- visibility of the levels of different suppliers within their supply chain;
- implementation of any policies and training for their employees to help identify and prevent forced and child labour;
- screening and onboarding practices for new and existing suppliers;
- monitoring and response mechanisms for allegations of forced and child labour; and
- any associations with geographic regions or entities that have been flagged as high-risk for forced and child labour practices.

The suppliers must also disclose any past and/or current allegations their organization has received that are related to forced and child labour. If information exists that must be disclosed, then the supplier is required to provide details on any mitigation and/or remedial measures that were implemented in response.

Identifying Risks of Forced and Child Labour in Orano Canada's Activities and Supply Chain

Orano Canada is aware of the potential risk of forced and child labour being present in its supply chain, which mainly consists of procuring goods and services for its uranium mining, milling, and exploration activities. As discussed below, a program to identify and mitigate those risks has been developed and implemented.

As discussed in our 2024 report, Orano Canada's Supply Chain Management Department engaged in an information gathering exercise regarding suppliers who frequently supply goods

and/or services for our operations. The goal of the exercise was to determine how many of Orano Canada's suppliers have operations in or their own supply chains from high-risk countries where forced and child labour practices are common. We created a list of countries sourced from both Orano Group's internal risk rating guide as well as *Walk Free's* Global Slavery Index (available at www.walkfree.org).

Once the list of high-risk countries was determined, we then expanded our information gathering to suppliers who sourced goods and/or services from those countries. From there, we created a questionnaire (the "Questionnaire") for the suppliers to complete that covered topics about mitigating the risk of forced and child labour in their supply chains.

The suppliers' responses to the Questionnaire ranged from being sufficiently detailed to no response provided. The consequences for suppliers who refused to participate or whose answers and risk mitigation processes were insufficient may include, but not be limited to, terminating our business relationship with them.

In 2025, our Supply Chain Management Department evaluated and reviewed the information submitted from the above-noted Questionnaire process that was completed in 2024. The goal of the evaluation and review was to determine which of our suppliers are located in or source goods/services from high-risk countries where forced and child labour practices are common.

We then ran a report of the inventory items that was sourced from the suppliers who were flagged as being high-risk. An in-depth review of their responses to the Questionnaire was completed to determine if the suppliers were at risk of engaging a supplier that uses forced and child labour in their operations.

Following that, we applied a risk-based assessment to our suppliers' responses to determine whether procuring goods from them that were flagged as high-risk for forced and child labour should continue. Where responses were assessed as acceptable, the procuring of the identified goods was permitted to continue. Where responses were unsatisfactory, we implemented alternate sourcing for the affected goods and terminated our relationship with that particular supplier.

Compliance Requirements in Contract Templates

In 2025, Orano Canada implemented changes to its contract templates to include language affirming that the third party represents and warrants that it:

- does not and will not use forced and child labour (as defined in the Act); and
- has taken and will continue to take reasonable steps to reduce the risk that forced and child labour is used in its supply chain.

The termination provisions in our contracts extend to the above compliance requirements. Therefore, if, for whatever reason, we suspect or have evidence that the supplier has breached its obligations regarding preventing forced and child labour in its supply chain, then we have the ability to terminate the contract (and our relationship with that particular supplier) immediately.

Forced and Child Labour Risk Mitigation

Corruption and Influence Peddling Risk Mapping

Orano Canada's Corruption and Influence Peddling ("C & IP") risk mapping process is an annual program driven by the Orano Group for analyzing risks of corruption and influence peddling in our organization. It is adapted to the business of the company using it, such as mining, milling, and exploration activities for Orano Canada, and lists the risks to which it may be exposed. It is used to help identify all the vulnerabilities inherent in an activity or project, which includes forced and child labour in our supply chain. By proposing a definition for each risk and a breakdown of risks, it provides a consistent framework for risk management and mapping.

The top C & IP risks are determined by interviewing personnel in Orano Canada's departments that may be exposed to such risks. The risks are then mapped in a risk register, which is reviewed and approved by Orano Canada's senior management. The risk register contains action plans to address and mitigate identified risks. Each risk is under the control of a manager who oversees the action plan and communicates it to relevant employees, and Orano Canada's Compliance Officer is required to monitor and provide internal reporting on the status of the action plan.

Remediation Measures

Orano Canada employs risk mitigation strategies as part of its comprehensive compliance. If a risk involving the potential use of forced or child labour were to be identified within our operations or supply chain, these strategies would be activated to address the issue appropriately.

Remediation of Loss of Income

To date, Orano Canada has not detected any instances of forced or child labour in our operations or supply chain. Consequently, there are no remediation measures currently in place, nor have we had to address the loss of income for vulnerable families that would arise from actions taken to eradicate forced or child labour in our activities or supply chains.

Training

New employees at Orano Canada must complete a mandatory course on our Code of Ethics. This course emphasizes the importance of respecting human rights, explicitly prohibiting any involvement in forced and child labour. By doing so, it reinforces Orano Canada's dedication to upholding human rights and fostering a workplace free from violence and discrimination. Certain employees, particularly those in supply chain management, are required to undergo this training annually. This annual training reaffirms Orano Canada's commitment to adhering to human rights laws in all our locations and ensuring a respectful work environment for our employees.

Assessing Effectiveness

Orano Canada evaluates the effectiveness of our current practices by incorporating risk management assessments into our operations. We conduct an annual risk assessment focusing on respectful workplace standards and protected grounds as outlined in the *Canadian Human Rights Act* as part of our compliance program. The outcomes of these assessments serve as valuable indicators of our effectiveness. We also understand that to achieve accurate and reliable results, our assessments must undergo continuous improvement and regular reviews of our existing compliance program.

As discussed above, the BRM undergoes an annual risk review, which is completed by Orano Canada's executive team.

International Council on Mining and Metals

Orano Canada undergoes period audits as a member of the International Council on Mining and Metals ("ICMM") as part of ICMM/s assurance and validation procedures (the "Procedures"). The Procedures establish company member requirements for independent assurance and validation. Topics that are assessed include, but are not limited to:

- ethical business;
- decision making;
- human rights;
- risk management; and
- health and safety.

The process is comprised of the following elements:

- **Self-Assessment of all assets subject to validation.** First-party confirmation of the existence and integrity of systems and/or practices relating to implementation of the performance expectations, which is to the extent that they are applicable in a given context.
- **Prioritization of assets for third-party validation.** The prioritization process follows clearly defined criteria chosen by the company undergoing the audit and includes a transparent disclosure of the selection process. The selection of assets may be based on a fixed percentage of assets, market-driven by virtue of commodities or geographies of particular concern (e.g. conflict minerals), based on customer demands, or a mix of these and other factors.
- **Third-party validation.** Independent confirmation of the reasonableness and authenticity of assertions made in self-assessments. This review may take place in conjunction with third-party work on a separate system (e.g. an ISO14001 environmental management system audit).

- **Disclosure.** Members are required to publicly disclose their performance expectation validation activities on an annual basis. This disclosure can be made on a member's website or in a sustainability or corporate report. The asset-by-asset disclosures that apply to self-assessments and third-party validations from 2022 onwards will provide clear line of sight to interested parties of the status of performance expectations implementation.

These validation activities are designed to effectively evaluate the implementation of the performance expectations individually. There is no overall outcome for a given asset. The possible outcomes for the validation of an individual performance expectation are "meets," "partially meets," and "does not meet." In some situations, the outcome may be "not applicable."

Third-party validations must be conducted by qualified validation service providers ("VSP"). VSPs are professional service providers and must meet ICMM requirements for independence, experience, expertise and lack of conflicts of interest. ICMM keeps a register of VSPs that members use. Members are required to publicly disclose their performance expectation validation activities on an annual basis. The disclosure can be made on a member's website or in a sustainability or corporate report. For our most recent ICMM audit in 2022, the Orano Group utilized KPMG, a professional services firm.

More information on the ICMM assurance and validation audit processes is available at <https://www.icmm.com/en-gb/our-principles/validation/procedure>.

Internal Audits

Orano Canada has an internal audit program, which is based on Orano Group's audit process requirements, for evaluating the Integrated Management System ("IMS") and related processes, including those of our supply chain management department. Our audits are performed by qualified internal employees who assess, against defined criteria, the effectiveness of the documented management processes and practices. They also assess the adequacy of how the applicable requirements have been met for a particular process.

Our audit protocols are based on the ISO 19011:2018 International Standard: Guidelines for Auditing Management Systems. Our audit program provides the guidelines for systematic analysis of IMS requirements, as they apply to departments and site, to determine the extent of management system control. In short, audits verify conformance and completeness.

Lastly, our supply chain management vendor evaluation process determines the need for audits based on various criteria related to business activities (e.g., health and safety, environmental performance, quality of goods and services, etc.). Any reason to suspect that human rights violations have occurred or may be occurring would also qualify as a reason for a vendor audit to occur.

4. Approval and Attestation

This Report is approved and attested as required under subsection 11(4)(a) and 11(5) of the Act.



Tammy Van Lambalgen
Executive Vice President & Chief Corporate Officer
April 20, 2026
I have the authority to bind Orano Canada Inc.