

Thyssen Mining Construction of Canada Ltd.

Modern Slavery Report

This Modern Slavery Report (the “Report”) is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) and covers the reporting period from January 1, 2025 to December 31, 2025. This Report is made on behalf of Thyssen Mining Construction of Canada Ltd. (“Thyssen” or the “Company”).

Introduction

Forced labour and child labour, as defined under the Act, are serious violations of human rights. As a Canadian underground mining construction contractor operating primarily in North America, Thyssen recognizes its responsibility to conduct operations ethically and to promote responsible practices throughout its supply chains. This Report outlines the steps taken during the reporting period to prevent and reduce the risk that forced labour or child labour is used in Thyssen’s operations or supply chains, including in goods produced in Canada or elsewhere, or goods imported into Canada by Thyssen or its suppliers.

Our Business

Thyssen is an underground mining contractor with offices in Regina Saskatchewan and Sudbury Ontario as well as various site locations. Thyssen’s supply chain includes various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for our operations.

In total, we procure goods and services from approximately 500 approved suppliers and contractors. The suppliers and contractors Thyssen engages with include businesses that are primarily local to our operations, and adhere to regulations in Canada for oil and gas production which are among the highest standards in the world.

Organizational structure

Thyssen Mining Construction of Canada Ltd. is the parent company of the following operating entities:

- Thyssen Mining Inc. (United States)
- Thyssen Mining Offshore Ltd. (Saskatchewan)
- CMAC – Thyssen Global Holding Inc. (Quebec)

Across all entities, Thyssen employs approximately 1,600 employees in Canada and the United States.

Policies and Due Diligence Processes

Thyssen is predominantly a North American business that conducts its day-to-day operations with a strong focus on proper governance. Thyssen’s Business Code of Conduct applies across the organization and sets out expectations for ethical behaviour and legal compliance, including mechanisms for anonymously reporting potential breaches to the Company’s Privacy Officer. All employees are expected to perform in accordance with the Business Code of Conduct, and employees involved in procurement and supply-chain activities annually complete additional training specific to the Act.

Thyssen complies with applicable laws in the jurisdictions in which it operates, including laws prohibiting slavery and human trafficking. Through the new initiative, Business Code of Conduct - that is currently being introduced, which

includes the implementation of a global ethics framework, the Company has strengthened its focus on identifying, preventing, and mitigating the risks of forced labour and child labour within its operations and supply chains. Thyssen is committed to upholding high ethical standards and to continuously enhancing its ethical governance practices across all regions where it operates.

These principles and documents establish standards of conduct that govern interactions among employees, business partners, and suppliers. Thyssen is continually reinforcing the Company's commitment to ethical behaviour and human rights. Thyssen promotes a respected workplace and provides employee support programs, including an employee and family assistance program, and Respect in the Workplace Policy.

Thyssen's supply chain management personnel follow internal standards for sourcing, procurement, and supplier selection appropriate to a mining construction contractor. New suppliers are subject to an approval process, and business units are responsible for ensuring supplier compliance with Thyssen's standards. Thyssen reviews certain suppliers for compliance with the Act, including by consulting the Public Safety Canada catalogue of reports. Thyssen will be implementing a Supplier Code of Conduct outlining expectations related to human rights, labour standards, legal compliance, health and safety, environmental responsibility, ethics, and governance.

Risk Identification and Assessment

Thyssen assessed the risk of forced labour and child labour within its operations and supply chains by considering factors such as supplier location, type of goods and services procured, and regulatory environment.

Given that Thyssen's operations and primary suppliers are located in jurisdictions with strong labour protections, the overall risk of forced labour or child labour is considered low. However, the Company recognizes that certain goods, such as equipment or components manufactured outside North America, may present a theoretical risk due to the complexity of global supply chains

Risk Mitigation Measures

To manage and mitigate risks, Thyssen maintains procurement standards and supplier expectations designed to reduce the likelihood of forced labour or child labour occurring within its supply chain. These measures include supplier approval procedures, contractual standards, training of procurement personnel, and ongoing oversight by business units responsible for supplier relationships. Potential concerns identified through these processes are escalated internally for further review and, where appropriate, engagement with the relevant supplier.

Remediation Measures

During the reporting period, Thyssen did not identify any instances of forced labour or child labour within its operations or supply chains.

Assessing Effectiveness

Thyssen assesses the effectiveness of its approach to preventing and reducing the risk of forced labour and child labour through periodic reviews of procurement practices, supplier oversight activities, and related internal policies and procedures. Effectiveness is evaluated by considering indicators such as completion of supplier approval and review processes, escalation and resolution of any identified concerns, and employee participation in mandatory training related to ethical conduct and supply chain responsibility. Thyssen reviews these measures periodically to determine whether enhancements are required in response to operational changes, supply chain developments, or regulatory guidance

Approval and 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.



Colin Wilson
Chief Executive Officer
Thyssen Mining Construction of Canada Ltd.