

# REPORT ON FORCED AND CHILD LABOUR IN SUPPLY CHAINS

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MAY 2025

# ABOUT THIS REPORT

This annual report has been prepared in accordance with the requirements of Section 11 of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and discloses information for the reporting year ended December 31, 2024. This report describes the steps K92 Mining Inc. and its wholly owned subsidiaries (the “**Company**”, “**K92**”, “**we**”, “**our**” or “**us**”) have taken to prevent and reduce the risk that forced labour or child labour (as such terms are defined in the Act; collectively, “**modern slavery**”) is used at any step in our activities and supply chains. This report has been prepared as a single-entity report for the Company.

## INTRODUCTION

At K92, we are committed to delivering long-term sustainable value to all of our stakeholders in an environmentally and socially responsible manner. This commitment is reflected in our mission and vision as well as in our core values.

We recognize that modern slavery presents potential risks that may affect companies and their supply chains globally. We are committed to doing our part in reporting on these risks in accordance with the Act.

Our efforts reflect the size of our Company as well as the unique sociocultural context in Papua New Guinea (“**PNG**”). In 2024 and into 2025, we have taken additional steps to identify, assess and mitigate potential risks related to modern slavery in our own operations and our supply chains. This annual report under the Act provides an overview of these steps.

Combatting modern slavery risks requires collective action from a broad group of stakeholders across global value chains. Looking forward, we remain committed to working in collaboration with our stakeholders to help address these risks in PNG and elsewhere.

## COMPANY OVERVIEW

K92 is engaged in the production and sale of gold, copper and silver from the Kainantu Gold Mine in the Eastern Highlands Province of PNG, as well as the exploration and development of mineral deposits in the immediate vicinity of the Kainantu Gold Mine. We declared commercial production from the Kainantu Gold Mine in February 2018. For a detailed description of our business activities, please refer to our website and our latest [Annual Information Form](#).

As at December 31, 2024, we had a total operational workforce (employees and contractors) of approximately 1,800 people. Approximately 92% of the Company’s operational workforce is from PNG, with an expatriate workforce comprising the remaining 8%. We maintain our head office in Vancouver, Canada, and have a regional corporate office in Brisbane, Australia, with a combined corporate staff of 36 as at the end of 2024.

The Company is listed on Canada’s Toronto Stock Exchange (the “**TSX**”) (TSX: KNT) and trades on the OTCQX® Best Market (the “**OTCQX**”) (OTCQX: KNTNF) and is incorporated under the *Business Corporations Act* (British Columbia).

## STEPS TAKEN TO PREVENT AND REDUCE RISK

In the year ending December 31, 2024, K92 took the following measures to prevent and reduce the risks of forced labour and child labour in our operations and supply chains:

- Updated the Board Sustainability Committee Charter to further clarify that oversight of risk management in relation to child labour and forced labour, including associated public reporting requirements, is covered as a Board-level responsibility.
- Presented regular updates to the Board and management on the measures taken to address modern slavery risks throughout the year.
- Continued modern slavery due diligence working with senior corporate and operations leadership.
- Conducted an additional review and gap analysis of our current policies, mandates and procedures as they relate to addressing and prohibiting the use of child and forced labour in our operations and supply chains. This includes a review against international sustainability performance standards that contain provisions related to child and forced labour.
- Reviewed and updated our Human Rights Policy to include a specific commitment to prohibit the use of forced labour or child labour (as those terms are defined by the International Labour Organization (“**ILO**”)).
- Adopted a Supplier Code of Conduct (the “**Supplier Code**”) that defines our expectation that our suppliers respect our core values and comply with our Supplier Code as a condition of doing business with the Company.
- Began implementing a provision in major supplier contracts that suppliers must comply with the Company’s policies and applicable laws and regulations regarding child labour and forced labour, including the Company’s Supplier Code.
- Updated the Company’s General Terms and Conditions for Goods as well as our General Terms and Conditions for Services to include compliance with the Company’s Supplier Code, which includes provisions related to modern slavery.
- Incorporated an additional question relating to modern slavery policy compliance into the pre-qualification questionnaire for major tenders.

- Developed an employment standard that includes prohibiting the use of child, forced and bonded labour as defined by ILO Convention 29 on Forced Labour and ILO Convention 138 on Minimum Age.
- Completed an initial supplier scoping exercise to map out the Company's supply chain and help identify potential suppliers that are a higher risk in relation to modern slavery.
- Completed a review of the Company's internal and external grievance mechanisms against international sustainability performance standards to determine strengths and areas for improvement.

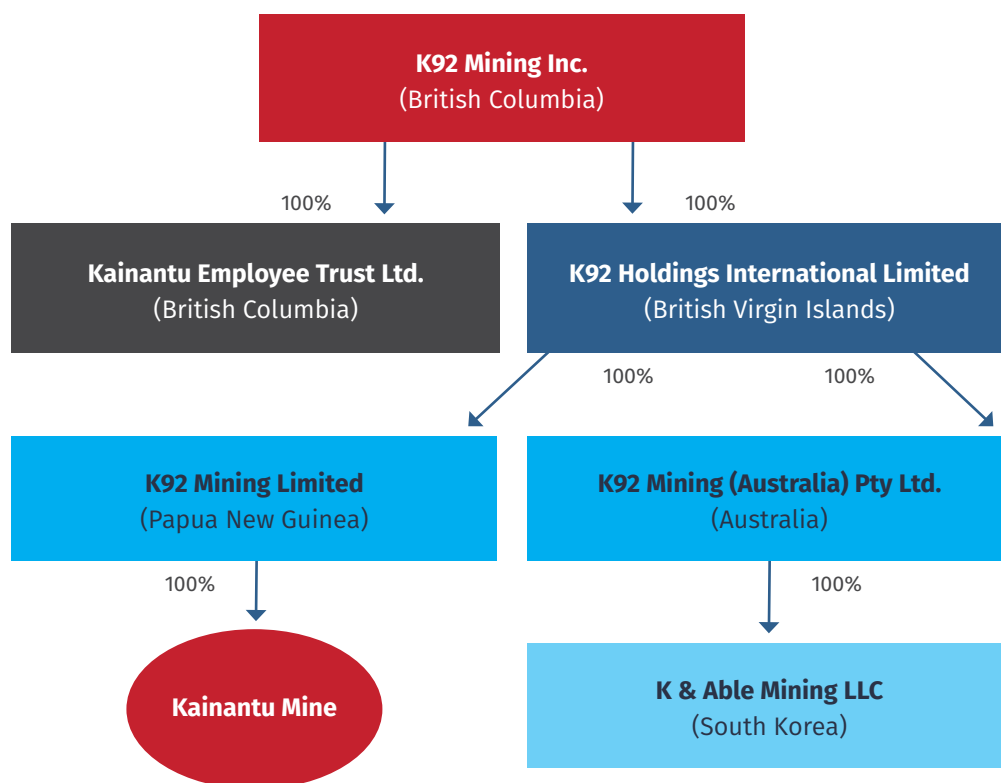
- Reviewed our grievance and whistleblower mechanisms for incidents related to forced labour and child labour.
- Developed new training and awareness modules related to modern slavery, which are now integrated into our online employee training and compliance platform.

Further details on these activities are provided in the following sections of this report.

## COMPANY STRUCTURE

The table and image below provide an overview of the Company's corporate structure, subsidiaries and interrelationships.

Entity	Principal Business	Jurisdiction of Incorporation
K92 Mining Inc.	Parent corporation; public company with operations in Canada	British Columbia, Canada
Kainantu Employee Trust Ltd.	Trust company	British Columbia, Canada
K92 Holdings International Limited	Holding company	British Virgin Islands
K92 Mining (Australia) Pty Ltd.	Holding company	Australia
K92 Mining Limited	Operating mine company	Papua New Guinea
K & Able Mining LLC	Project generation	South Korea



# OPERATING ACTIVITIES AND SUPPLY CHAIN OVERVIEW

Gold production forms the majority of the Company's revenues. Gold, copper and silver are produced primarily in the form of concentrate, which is then sold pursuant to an offtake agreement with Trafigura Pte Ltd. ("**Trafigura**"), a multinational commodity trading company based in Singapore. Approximately 10–15% of our total annual gold production and 1–2% of silver production is in the form of doré that is produced by the Company at its operations in PNG. The Company uses the services of a refinery in Australia to process the doré to market delivery standards. All copper production is in the form of concentrate, which is also sold under the same offtake agreement with Trafigura.

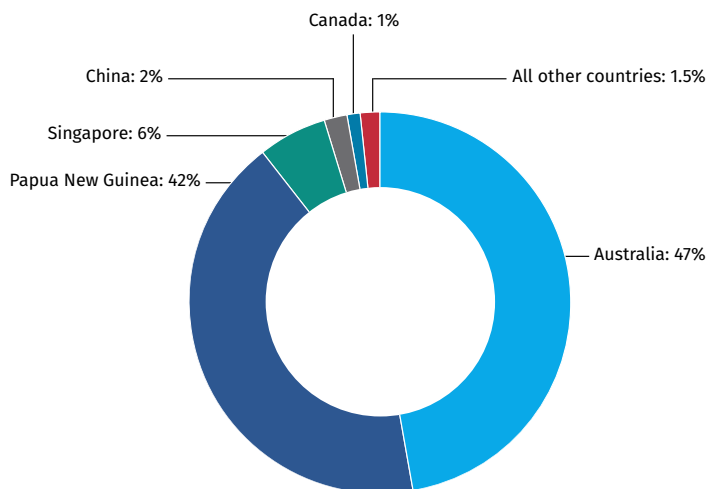
In 2024, we spent US\$240.6M on goods and services, approximately 42% of which was procured from PNG-based companies. Procurement from PNG-based companies as a percentage of overall procurement was lower in 2024 compared to previous years due to the significantly higher level of growth and expansion capital that was spent to procure goods and services from suppliers in support of our Stage 3 Expansion.<sup>1</sup>

In 2024, we did not procure any goods or services from the 10 countries listed as "most prevalent for modern slavery risks" as defined in global benchmark reports.<sup>2</sup>

Key goods and services that we procure include:

- Construction and engineering services and materials
- Heavy machinery and equipment
- Energy, fuels and explosives
- Industrial plant equipment
- Grinding media
- Reagents and chemicals
- Concentrate transportation
- Professional services
- Travel and logistics
- IT and communications equipment and services
- Health, safety and personnel protective equipment
- General services including catering, security, agriculture and livestock supply, routine maintenance and landscaping services

In 2024 and into 2025, we advanced the mapping of our supply chain that consisted of over 1,500 suppliers. Preliminary results indicated the following breakdown as a percentage of overall procurement expenditure in 2024: 42% from PNG-based companies, 47% from Australia, 6% from Singapore, 2% from China and 1% from Canada. The following graph<sup>3</sup> summarizes our procurement expenditure by country in 2024.



Going forward, this mapping work will serve as a foundation for ongoing risk assessments related to modern slavery, including helping to identify higher risk suppliers of goods and services for further due diligence.

<sup>1</sup> For the three years prior to 2024, procurement from PNG companies averaged 59% of total procurement and foreign procurement averaged 41% of total procurement. Going forward, it is expected that procurement from PNG will revert toward historical averages.

<sup>2</sup> See the [Walk Free Global Slavery Index summary](#).

<sup>3</sup> Numbers do not add to 100% due to rounding.

# GOVERNANCE, POLICIES AND DUE DILIGENCE PROCESS

Our Sustainability Committee of the Board of Directors has oversight for ensuring that appropriate policies, management systems and personnel are in place to support safe, socially responsible and sustainable business practices. This includes oversight of responsible management of social and human rights impacts of the Company as well as sustainability-related public disclosure requirements, including those related to the Act. The committee's Charter was reviewed and revised in 2024 to enhance the committee's oversight of matters related to our disclosures under the Act.

In addition, due diligence activities related to modern slavery continued in 2024 with an internal working group composed of senior corporate and operations leadership, including representatives from key functions including sustainability, procurement, community relations, human resources and finance. Our Director, Sustainability & ESG coordinates the work of this group. Progress on work plans and items related to modern slavery are reported to senior management monthly, and to the Sustainability Committee on a quarterly basis.

In 2024, we continued to focus our due diligence measures related to analysis and mitigation of modern slavery on further embedding responsible business conduct into our key policies, procedures and systems. We completed an additional internal review process of our key policies to help integrate modern slavery considerations into our overall commitments to responsible mining. We also strengthened our standards and procedures to support the implementation of our policies. Our practice is to ensure that policies, standards and procedures are developed in conjunction with external and internal subject matter experts, including senior management and functional operational leads, as appropriate. Policies that relate to human rights and the mitigation of forced labour and child labour in our supply chain are available on our public [website](#), and are summarized below. New policies and procedures will be established when it is considered necessary as additional preventive steps.

Our **Code of Business Conduct and Ethics** (the “**Code of Conduct**”) sets our expectations for conducting business to the highest standards of ethics, integrity, honesty and accountability. The Code of Conduct applies to everyone working on behalf of our Company, including directors, employees and contractors.

Our **Human Rights Policy** outlines our commitment to respecting human rights in alignment with international human rights frameworks, including the United Nations Guiding Principles on Business and Human Rights. This policy was updated in 2024 and now contains a commitment to prohibit forced, bonded and child labour within our direct operations as well as in our supply chains. This includes a specific provision that K92 will not directly employ anyone under the age of eighteen (18) years old.

Our **Supplier Code of Conduct** (the “**Supplier Code**”) was developed in 2024. The Supplier Code defines our expectation that our suppliers respect and adhere to our core values. Suppliers are required to comply with our Supplier Code as a condition of doing business with the Company. In 2024, we included adherence to the Supplier Code as a provision in our

General Terms and Conditions for Goods as well as our General Terms and Conditions for Services, which are available on our public [website](#). Adherence to the Supplier Code will now also form part of all major contracts with suppliers of goods and services. In 2024, an additional question relating to modern slavery policy compliance was also incorporated into our pre-qualification questionnaire for major tenders.

Our **Whistleblower Policy** provides mechanisms for anonymously reporting any potential cases of misconduct or fraud related to the Company's activities. To ensure awareness of this policy, a copy of it is distributed to all affected personnel and it is posted on the Company's public [website](#).

Our **Anti-Bribery and Anti-Corruption Policy** is intended to ensure that the Company, together with its directors, officers, employees, consultants and contractors, conducts business honestly and ethically, reflecting the highest standards of integrity, and in compliance with all relevant laws and regulations.

We will continue to review the adequacy of our policies and procedures at least annually. Whenever significant changes are made to the policies, they are communicated as necessary.

To further embed responsible business conduct into our policies and systems, we have developed additional standards and procedures that relate specifically to modern slavery. Our employment standard, which includes a provision prohibiting the direct employment of anyone under the age of 18 years, was adopted in 2024. A provision has also been incorporated into our contractor services contract templates enforcing this requirement. Identity verification in PNG can present a challenge due to the lack of formal identification among a significant proportion of the country's population, and we therefore apply multiple tiers of identity verification steps tailored to the local context.

In addition to our whistleblower mechanism, we maintain an internal grievance mechanism for workers to raise workplace concerns. When each employee is hired, the grievance process is explained to them and they are required to sign a “certificate of acknowledgement” that they have received, read and understood all the Company's policies and procedures. Grievance mechanism reminders are communicated every 18 months via group emails to supervisors.

We also maintain a site-level, external grievance management process that provides local communities and stakeholders with a culturally appropriate way to submit potential concerns to the Company. A key method by which grievances are relayed to the Company is through our village-based community liaison officers, who maintain a regular presence in local communities within the vicinity of the Kainantu Gold Mine. The accessibility of these liaison officers enables the timely resolution of issues, and supports two-way feedback between local communities and the Company.

Our internal and external grievance mechanisms were reviewed in 2024 against international sustainability performance standards, namely the IFC Performance Standards. The review was conducted by independent consultants and helped to identify strengths in our current approach as well as opportunities for improvement going forward.

# RISK ASSESSMENT AND MANAGEMENT

In 2024, we focused our modern slavery risk assessment and risk management efforts on our direct operations and contractors in PNG, given that approximately 92% of our workforce is based in PNG and the country has been identified as a high-risk jurisdiction for modern slavery.<sup>1</sup>

In 2024 and into 2025, we completed an independent, third-party assessment of our sustainability performance against international sustainability standards, namely the IFC Performance Standards and the World Bank Health, Safety and Environment Guidelines. The IFC Performance Standards contain specific and general provisions related to modern slavery, including forced and child labour. The assessment did not reveal any significant issues related to modern slavery and provided recommendations for enhanced management and performance.

In 2024 and 2025, we also completed an initial supplier mapping exercise to help better understand potential material modern slavery risks within our supply chain. The mapping focused on delineating our suppliers of goods and services by jurisdiction. This will help future identification, prioritization and assessment of suppliers that may pose a higher risk of involvement in modern slavery, either directly or indirectly. This forms a foundational step in our broader risk assessment and due diligence program that we will continue to build on going forward.

The risk of child labour within our direct workforce is considered low since most positions in the Company require specialized skills and knowledge that are carried out by highly trained and qualified individuals. Our Human Rights Policy and employment standard both prohibit the employment of anyone under the age of 18 years of age. Our Employee Records Procedure supports the implementation of these policies, which will be included in our Human Resources auditing program.

The agriculture and livestock sectors have been identified as a higher risk sector for child labour within our supply chain in PNG.<sup>2</sup> We source a significant amount of our agriculture and livestock supply for our camp facilities from suppliers based in the country, including from local farms within the vicinity of the mine. We recognize that there are activities, such as assisting in a family business or farm, that can contribute to children's development and to the welfare of their families. Such activities, when not deemed as child labour, can provide skills and experience and help people prepare to become productive members of society during their adult life.<sup>3</sup>

We recognize the importance of child education, and our community programs have a strong focus on education. We accordingly invest in a variety of local educational programs to encourage youth education. In 2024, we provided 66 scholarships to local students, provided tuition support for our employees' dependents through an enrolment fee matching program, and provided support for school infrastructure provision.

Local contracts for work, such as routine maintenance and landscaping services, may carry a risk of child labour. These contracts for field-level work are typically assigned to local landowners who may have less robust administrative and management systems related to hiring and payment of wages compared to more established contractors.

Our risk management processes in 2024 included identifying, evaluating and addressing social and environmental risks and opportunities on a regular basis. We will continue the ongoing assessment of modern slavery risks to help inform our risk mitigation strategies going forward.

## EFFECTIVENESS ASSESSMENT AND REMEDIATION

We assess our effectiveness in mitigating modern slavery risks through regular audits of our performance against our Company policies and standards, as well as implementation and monitoring of our internal procedures. We are now including our employment standard and employment procedures as part of our Human Resources auditing program, and we keep comprehensive training records, which will help to ensure that our employees and contractors are aware of our policies and commitments related to the prevention of modern slavery risks.

In 2024, we conducted an independent, external review of our sustainability performance against the IFC Performance Standards. These standards include provisions related to prohibiting the use of forced and child labour. No issues with respect to our performance against these standards were raised by the independent assessor or peer reviewer.

In 2024, we conducted routine monitoring of our whistleblower and grievance mechanisms. In 2024, there were no complaints related to modern slavery reported through these channels. During the year, we did not take any remediation measures related to forced or child labour, nor did we identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Our policies related to forced and child labour risks in our activities and supply chains were reviewed by the Board of Directors in 2024 and will continue to be reviewed on at least an annual basis. New policies and procedures will be established as necessary.

If the Company is informed of, or discovers, the potential for or the confirmed presence of forced or child labour in our supply chains, we will investigate and take the appropriate remedial measures.

<sup>1</sup> See the [Walk Free Global Slavery Index summary](#).

<sup>2</sup> See the [U.S. Department of Labor's 2022 Findings on the Worst Forms of Child Labour](#).

<sup>3</sup> See [International Labour Organization Convention 138 Convention C138 – Minimum Age Convention, 1973 \(No. 138\)](#).

# TRAINING

In 2024, we continued to implement training programs related to our Company-wide policies. Our employees received regular training delivered through Safetrac, a third-party, online compliance training platform.

In 2024, two new training modules were developed through Safetrac that relate specifically to modern slavery. These include a human rights training module as well as a module related to forced and child labour. This Safetrac training will be mandatory for employees from front-line management through to the Board of Directors and will be expanded to our key contractors. Employees will be required to attest to completing and understanding key policies through the training platform on a bi-annual basis.

We are also enhancing our internal communications measures to build awareness around our commitments to mitigating modern slavery risks in our direct operations and supply chains. This will include providing site-wide communication notices as well as posting key Company policies throughout the mine site on department bulletin boards. A centralized, online platform is being developed for employees to easily access all Company policies and procedures.

We will continue to extend our training and awareness initiatives related to modern slavery risks across the Company on an ongoing basis.

## REPORT APPROVAL AND ATTESTATION

This report was approved by the Board of Directors of K92 Mining Inc. on May 26, 2025, pursuant to paragraph (4)(a) of Section 11 of the Act. 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 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.

**I have the authority to bind K92 Mining Inc.**



John D. Lewins

Chief Executive Officer and Director

May 26, 2025





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