

# **MODERN SLAVERY REPORT**

**Fiscal Year 2023**

This Modern Slavery Report (the "**Report**") addresses the period from October 1, 2022 to September 30, 2023 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the "**Act**").

This Report is made on behalf of Amalgamated Mining & Tunneling Inc. ("**AM&T**").

## **INTRODUCTION**

At AM&T, corporate integrity, responsible product sourcing, and the safety and well-being of workers across the global supply chain are of paramount importance to our operations, management, and business. As part of our commitment to holding ourselves to the highest standards of respecting and protecting the human rights belonging to all individuals involved and affected by our business operations, we have a responsibility to ensure exploitative practices, including forced labour and child labour ("**Modern Slavery**") are addressed and minimized in our supply chain. Through continuous reassessment of our practices, and a dedication to improving them by taking action, we strive to prevent and reduce the risk that Modern Slavery is used in our operations or supply chain.

## **STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN**

### ***Structure***

AM&T is a private corporation existing under the *Business Corporations Act* (Alberta), has a board of directors as its governing body, and has no operating subsidiaries. AM&T is headquartered in Edmonton, Alberta, and has 18 staff located across Canada.

### ***Activities***

AM&T's sole business activity is the sourcing and supply of new and used surface and tunneling machines, for sale and for rental, to customers globally.

### ***Supply Chain***

AM&T primarily sources its surface and tunneling machines from a number of reputable suppliers and manufacturers, namely, Kovatera, Getman, and Sandvik, as well as sources used machines from a network of contractors, minesites, auctions, and other third party resale houses. Kovatera is based in Ontario and engineers and manufactures underground mining utility vehicles. Getman Corporation is based in the United States and is a global supplier of mobile equipment. Sandvik Canada Inc. is part of the global industrial engineering group Sandvik and manufactures tools and machining solutions.

## **MODERN SLAVERY POLICIES AND DUE DILIGENCE PROCESSES**

AM&T has been in operation for decades and takes governance matters seriously. We are always looking for ways to learn, grow, and become a better corporate citizen. Our senior leadership team is always looking for ways to mitigate risk to AM&T's business, including with respect to the risks of Modern Slavery



in our operations and supply chain. We do not tolerate slavery or human trafficking in our organization or those of our suppliers or others with whom we conduct business.

As part of AM&T's commitment to continuous improvement and in recognition of the importance of combatting Modern Slavery, we intend to adopt and roll-out a focused Anti-Modern Slavery Policy during our 2024 fiscal year.

We expect and have always expected our suppliers and others with whom we conduct business to adhere to business principles and values similar to our own and to comply with all applicable laws. We aim to work only with reputable third-parties that we feel share our values and commitment to worker well-being. In order to mitigate potential risks of Modern Slavery in our supply chain, we are constantly monitoring and reviewing supply chain and business relationships with a critical eye to all business risks. To this end, AM&T intends to implement a Supplier Code of Conduct during its 2024 fiscal year to put in writing the standards to which we currently hold our suppliers in principle, including our expectation that our suppliers take all reasonable steps to themselves identify risks, and mitigate and remediate incidents, of Modern Slavery in their own operations and supply chains.

## **MODERN SLAVERY RISKS, MITIGATION, AND REMEDIATION MEASURES**

### ***Risk Identification and Mitigation***

We encourage transparent communication between management, employees, and third-parties, including suppliers, enabling all parties to raise and voice concerns with our senior leadership regarding potential risks of any kind within our operations and supply chain. As part of our overall risk identification and mitigation strategy, we are continuously reviewing our risk management infrastructure including policies, procedures, and legal obligations.

We recognize the need for vigilance in identifying, mitigating, and remediating the risks of Modern Slavery in our supply chain and intend to implement processes through which we can collect specific information in this regard from our suppliers so as to put ourselves in a position to better identify such risks. Until we receive further data in this regard, we have not identified any risks of Modern Slavery in our operations or supply chain.

### ***Remediation Measures***

As we have not yet conducted a specific assessment of our operations and supply chains focused on identifying risks of Modern Slavery, we have correspondingly not identified any incidents of Modern Slavery being used. Therefore, we have not needed to take any measures to remediate any incidents of Modern Slavery. We acknowledge the need for vigilance and ongoing monitoring to ensure that we continue to mitigate all risks, including risks of Modern Slavery, in our operations and supply chains. To that end, we will regularly review our risk assessments and implement any necessary remediation measures should the need arise in the future.

## **LOSS OF INCOME REMEDIATION**

To date there have been no identified or reported instances of loss of income to vulnerable families that results from measures taken to eliminate the use of Modern Slavery in our operations and supply chains.





As we have not received any evidence of Modern Slavery, human trafficking incidents, or loss of income as a result of steps taken to eliminate Modern Slavery in the prior fiscal year, there has not been a basis to take remedial steps regarding such matters.

### **TRAINING PROGRAM**

We believe that awareness and education are crucial in preventing Modern Slavery. To that end, we intend to provide training from time to time for all applicable employees of AM&T working in areas which could be impacted by Modern Slavery. The scope of the training would focus on our policies and due diligence practices to address Modern Slavery while promoting awareness of our obligations under the Act and identifying key risk factors. Where employees work directly with suppliers, it is important for them to clearly articulate to our suppliers what is expected of them in this regard.

### **ASSESSING EFFECTIVENESS**

Our ongoing commitment to preventing and minimizing risks in our operations and supply chain involves our continuous monitoring and assessment of the efficacy of our current policies, codes of conduct, due diligence procedures, and training. Where appropriate, we will take necessary steps to improve our processes. If potential risks in our operations and supply chains are identified, we will subsequently identify the appropriate corrective action both internally and with third-parties, including suppliers, and will track these issues to completion.

We are committed to continuous learning and improving our efforts to combat Modern Slavery and human trafficking. As stated above, we have identified the need for adoption of a formal Anti-Modern Slavery Policy and Supplier Code of Conduct and intend to take steps to implement these governance documents in the 2024 fiscal year. Further, we intend to:

- further integrate Modern Slavery considerations into our risk assessment and due diligence processes;
- implement training programs with a focus on identifying Modern Slavery risks; and
- collaborate with industry peers and organizations to share best practices and drive collective action against Modern Slavery.

We are committed to combatting Modern Slavery in all its forms. We recognize the importance of transparency and accountability in this effort and will continue to work diligently to ensure that Modern Slavery and other slavery-like practices have no place in our business.

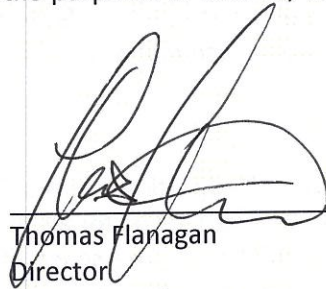
### **APPROVAL AND ATTESTATION**

This Report was approved pursuant to paragraph (4)(a) of the Act by the board of directors of AM&T. This Report is also available on our website at: [amt-inc.ca](http://amt-inc.ca)

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.



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Thomas Flanagan

Director

December 9<sup>th</sup>, 2024

*I have authority to bind Amalgamated Mining & Tunneling Inc.*