



# **Fighting Against Forced and Child Labour in Supply Chains Act**

Modern Slavery Act 2015 (Amended 2018)

**2024 Annual Statement**

## About this Report

This is a joint report (the “Report”) for Calibre Mining Corporation (“Calibre” or the “Company”) and certain of its wholly-owned subsidiaries noted below (the “Reporting Entities”) in accordance with Section 6(2) of Canada’s *Fighting Against Forced and Child Labour in Supply Chains Act* (S.C. 2023) (the “Act”) for the period from January 1 to December 31, 2024. The Report details the measures the Reporting Entities have implemented to identify, prevent, and address forced and child labour risks throughout their operations and supply chains.

This is not a revised version of a report already submitted this reporting year.

## About Calibre Mining

### Structure

Calibre is incorporated under the *Business Corporations Act* (British Columbia) (“BCBCA”). Its head office is located at Suite 1560, 200 Burrard Street, Vancouver, British Columbia, V6C 3L6. Calibre’s registered office is located at 2200 HSBC Building, 885 West Georgia Street, Vancouver, British Columbia V6C 3E8.

The Company’s common shares are listed on the Toronto Stock Exchange (TSX) in Canada under the ticker symbol CXB and quoted in the United States on the OTCQX Best Market under the ticker symbol CXBMF.

### Activities

Calibre is a Canadian-listed, Americas focused mid-tier gold producer with a strong pipeline of development and exploration opportunities across Newfoundland and Labrador in Canada, Nicaragua and Nevada and Washington in the United States. Calibre owns three producing mines and has a large exploration portfolio in Canada, United States and Nicaragua. The Reporting Entities consist of Calibre and the following wholly-owned subsidiaries which meet both the “Entity” and “Reporting Entity” tests under the Act:

- Marathon Gold Corporation (100% ownership), an Ontario, Canada company which owns the Valentine Gold Mine (“Valentine”) an open pit mining and conventional milling operation under construction located in Newfoundland and Labrador, Canada and which the Company acquired on January 24, 2024; and
- Adobe Capital and Trading Limited (100% ownership), a Barbados company which owns the following operations:
  - El Limon Mine (100% ownership), an underground and open pit gold mining operation including a milling facility located approximately 100 km northwest of Managua, Nicaragua (“El Limon Complex”); and
  - La Libertad Mine (100% ownership), an underground and open pit gold mining operation which includes other including a milling facility located approximately 110 km east of Managua, Nicaragua (“La Libertad Complex” or “La Libertad”).

As of December 31, 2024, Calibre had approximately 1,449 employees and 3,590 contractors. Calibre is committed to hiring locally and most employees and contractors at each of its operations come from local communities.

Calibre’s principal product is gold doré refined to market delivery standards by a refiner with locations in North America that is an arm’s length party. Calibre also produces silver as a by-product. The principal buyers of the gold and silver, once refined, are international bullion banks, traders and the refiner. There is a worldwide market for gold and silver into which Calibre could sell its refined gold and, as a result, Calibre is not dependent on a particular purchaser regarding the sale of gold and silver it produces.

Calibre produced 242,487 ounces of gold in 2024 from its operations and is advancing Valentine's construction, set to be Atlantic Canada's largest gold mine, with first gold production expected before the end of the third quarter of 2025.

On February 23, 2025, Calibre and Equinox Gold Corp. announced a merger pursuant to a court-approved plan of arrangement (the "Equinox Transaction"). The combined company will continue under the name "Equinox Gold Corp." For further information, refer to the Company's news release dated February 23, 2025, available on the Company's website at [www.calibremining.com](http://www.calibremining.com) and on Calibre's profile on [www.sedarplus.ca](http://www.sedarplus.ca). Shareholders of both Calibre and Equinox approved the Equinox Transaction on May 1, 2025. The Equinox Transaction is expected to close prior to the end of the second quarter of 2025, subject to the receipt of the remaining regulatory approvals and consents and the satisfaction of other customary closing conditions.

Additional information relating to Calibre's corporate structure, including a chart showing its principal subsidiaries, activities and principal risks can be found in the Company's Annual Information Form for the year ended December 31, 2024, available on the SEDAR website, [www.sedarplus.ca](http://www.sedarplus.ca), and the Company's website, [www.calibremining.com](http://www.calibremining.com).

## Supply Chain

The Company is involved in the business of exploring for gold, developing mines, mining gold bearing material, processing material to extract gold (and by-products) and selling gold. Our relationships with suppliers vary from one-off engagements through to long term contractual agreements.

Our supply chain activities cover the complete mine lifecycle from exploration through to closure. Most of our procurement spending can be categorized in the following procurement areas: procurement of goods (raw materials, electricity, power, and consumables); operational and technical services (e.g., engineering, construction, transportation); and administrative and support activities (e.g., security, catering, janitorial) from global and regional suppliers, prioritizing ethical sourcing. Calibre uses critical components such as water, electrical power, explosives, diesel, heavy machinery, construction materials, and cyanide in its business, all of which are readily available. Logistics include transporting raw materials and delivering semi-refined gold that we produce. The Company's business does not have a substantial economic dependence on any single commercial contract or group of contracts either from suppliers or contractors.

In 2024, the Reporting Entities procured goods and services from approximately 1,461 suppliers. The main commodities procured were in the categories of services (construction, mining operations, civil engineering, ore transportation, logistics, contract labor) and consumables (cyanide and other reagents, grinding media, fuel, explosives, and exploration).

Calibre is committed to working with responsible suppliers and building a supply chain that is efficient, resilient, and responsive to both Company requirements and the priorities of our communities. The Company recognizes its responsibility to help ensure its supply chain mirrors its own strong values and principles, with the goal of using local suppliers to the extent practical to maximize the value generated in the countries and communities in which we operate.

During 2024, the Reporting Entities spent US\$797 million on in-country procurement (Canada and Nicaragua), representing 94% of the total annual procurement by the Reporting Entities and reflecting our commitment to procuring goods and services from the communities in which we operate.

## **Governance, Policies and Due Diligence Processes related to Forced or Child Labour**

### **Policies**

Integrity guides our actions every day. The Company's Corporate Governance Policies, approved by the Board and reviewed on an annual basis, establish commitments to ethical conduct, compliance with applicable laws, rules and regulations, and human rights. They align with international frameworks such as the Universal Declaration of Human Rights, the UN Guiding Principles, the International Labour Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines. Policies include the Code of Business Conduct and Ethics, the Whistleblower Policy, and Insider Trading Policy which promote integrity and accountability. Such policies apply across business relationships and are reinforced through training and public disclosures.

The Company is committed to its corporate responsibility to respect the human rights of individuals affected by its business activities. The Company in no way supports or engages in child labour, forced labour or modern slavery practices.

The Company seeks to ensure that its suppliers, including contractors, maintain lawful business practices; agreed standards of quality and timeliness of delivery; safe, healthy and fair workplaces; zero tolerance for human rights violations, in relation to both their personnel and the communities in which they work; and business practices that minimize environmental impact.

Calibre upholds responsible sourcing practices through the adoption of various policies and processes, including our Code of Business Conduct and Ethics, People Policy, Supply Chain Policy, Purchasing Policy, contractor management systems and due diligence procedures, and Human Rights Standard, which apply to employees, suppliers, and contractors, ensuring ethical sourcing, legal compliance, and sustainability. Any breach of the policies can be reported or expressed anonymously using the Company's Whistleblower policy.

Complementarily, Calibre has been a member of the World Gold Council since 2020 and adheres to the World Gold Council's Responsible Gold Mining Principles ("RGMPs"). The Company publicly reports the status of conformance with these principles. This report is externally assured by a third-party independent assurance provider.

During the reporting period, Calibre's governing bodies and employees, and the business partners of the Nicaragua Reporting Entity were informed of the Company's Corporate Governance Policies.

### **Governance**

Calibre's sustainability governance is a multi-tiered structure ensuring effective oversight and management of our economic, environmental, and social impacts, all while ensuring ethical business conduct, transparency, and regulatory compliance.

Governance oversight of the policies and activities of the Company as they relate to the health and safety of the employees of the Company in the workplace, the sustainability and corporate social responsibility engagement is provided at the Board of Directors level by the Safety, Health, Environment, Sustainability and Technical (SHEST) Committee,

The President & Chief Executive Officer (CEO) is responsible for leading the execution of the Company's core strategies and ensuring compliance with policy commitments. At the executive level, corporate oversight on supply chain and compliance processes lies with the Chief Finance Officer, implementation of the sustainability programs is the direct responsibility of the Senior Vice-President Sustainability, and human capital matters of the Senior Vice-President Human Capital. They all report directly to the CEO.

As human rights risks are cross-disciplinary, responsibility for overseeing the application of adequate due diligence is delegated to senior managers at each operation, according to their areas of expertise, such as human capital, supply chain, health and safety, artisanal and small-scale mining, and community relations. General Managers and Department Heads are responsible for ensuring Calibre's commitments to human rights are upheld at the operations. Employees, suppliers and contractors are expected to adhere to these policies, supported by communication and training.

The local supply chain teams are responsible for supply chain activities for the business units encompassing sourcing, purchasing, and delivering functions. The country-level Supply Chain Manager is responsible for developing, distributing, implementing, and verifying the execution of the procurement policy and procedures. The purchasing group is the only group authorized to establish an obligation with a supplier in accordance with applicable policies and guidelines.

## **Due Diligence**

Calibre supports and respects human rights consistent with the Universal Declaration of Human Rights and actively seeks to ensure that the Company is not complicit in human rights abuses committed by others. Calibre has clear procedures to manage the human rights dimensions of its operations, including the dignity, well-being and rights of employees, their families and the communities in which it operates. Where those rights are threatened, the Company seeks to have international standards upheld and avoids situations that could be interpreted as tolerating human rights abuses.

Calibre's procurement strategy prioritizes ethical business conduct, local economic contributions, and supplier accountability. The Company holds a human rights due diligence process in place for all contractors and business partners. Contractors are trained on human rights policies and are required, as part of their contracts, to implement and follow Calibre policies.

The Reporting Entities integrate responsible procurement requirements into all supplier contracts, mandating compliance with human rights, labor rights, anti-corruption laws, corporate policies, health and safety standards, and environmental regulations. A Know Your Counterparty (KYC) management system ensures continuous supplier due diligence with a focus on legal and regulatory compliance. Moreover, suppliers may be subject to audits to ensure compliance with their contractual undertakings, and applicable policies and standards.

To enhance supplier engagement, Calibre conducts training on corporate policies, ethical sourcing, anti-corruption, and sustainability, reinforcing adherence to responsible business practices. The Company also engages stakeholders - including contractors and communities - and maintains accessible grievance mechanisms in place to ensure procurement decisions reflect local needs and minimize or provide fair and timely redress to adverse impacts.

In 2024, 100% of new suppliers for Nicaragua Reporting Entity were screened using social criteria, and annual due diligence was conducted on 1,494 active and potential suppliers, ensuring 100% screening for human rights compliance. The RGMP assurance site visit at La Libertad Complex in Nicaragua included an in-depth review of high-risk contractors, while a Human Rights Impact Assessment (HRIA) at Eastern Borosi Mine, which is part of La Libertad Complex, further evaluated contractor risks. As a result, nine suppliers were identified with human rights risks, and a remediation plan was implemented to address the findings.

## **Risk of Forced and/or Child Labour in our Business**

In assessing the inherent risk of forced and child labour across its business and supply chains, Calibre considers country-specific vulnerabilities, the nature of mining operations, sector-specific risks, and workforce characteristics that may increase vulnerability.

Within the Company's direct operations, the risk of forced or child labour is considered low due to the specialized skills required, established recruitment practices, and applicable legal frameworks. All Calibre employees are engaged through formal contracts.

As part of Calibre's review of its direct supply chain for areas of the inherent risk of forced labour and child labour (i.e. the degree of risk without applying the Company's risk mitigation measures), the Company relied on the Global Slavery Report which provides relative country ranking for risks of forced labour and child labour and a list of products made in certain countries which are at high risk for modern slavery and child labour. The countries where Calibre operates vary in their vulnerability to modern slavery, as indicated by the 2023 Global Slavery Index (GSI): Canada (11), the United States (25), and Nicaragua (54).

Calibre's review of forced labour and child labour risks is focused on contractors working on site. While the Company takes steps to identify such risks, it has not yet undertaken a comprehensive, formal assessment of its entire supply chains to identify heightened risks of forced or child labour. However, Calibre recognizes that certain segments, particularly low-skilled contract labour and artisanal supply chains, present higher risks.

As part of Calibre's business model in Nicaragua, the Company purchases gold from artisanal and small-scale mining ("ASM") operations located on land under Calibre's concessions. These supply chains are informal by nature and known to carry elevated risks of child labour, with documented cases of children working as young as 12 years old. This context positions Nicaragua and ASM as the areas of greatest inherent risk. See below information in relation to risk management and mitigation in respect of this risk.

## Risk Management

Calibre proactively assesses procurement-related risks, including:

- Environmental risks: Potential degradation due to unsustainable supplier practices.
- Social risks: Labor rights violations, inadequate health and safety measures, and human rights concerns.
- Corruption risks: Exposure to unethical business practices within the supply chain.

To mitigate these risks, Calibre has policies and due diligence processes in place to prevent and/or reduce the risks of forced labour and child labour in its operations and supply chain:

- **Pre-screening:** Given Nicaragua's higher risk profile, compliance teams screen all suppliers before engagement and conduct periodic due diligence reviews to identify and address potential risks and violations through the completion of Know Your Customer forms. Medium-risk suppliers undergo reviews every two years, and high-risk suppliers on an annual basis. If a supplier is found to have a negative impact on society or the environment, no commercial relation is established or the relation is terminated.
- **Hiring processes:** Site-level management enforces compliance with labour laws, with strict proof-of-age policies and hiring procedures and records in place to prevent anyone under the legal working age from obtaining employment or even entering the mine sites.
- **Legal compliance:** Tendering process terms and conditions and supplier contracts include precautionary clauses and controls, specifically prohibiting the use of child or forced labour. While suppliers have autonomy in internal labour relations, adherence to national laws, corporate standards, and governance policies is a mandatory requirement, as communicated at the start of the tender process and included as appendices in procurement contracts that require signature of acknowledgment.

- **Training and awareness:** Training is provided to all employees on the Corporate Code of Conduct, and, in Nicaragua, all employees and contractors are required to undergo a social induction, which includes a section focused on human rights risks.
- **Contractor oversight:** In Nicaragua, supplier inspections, contract monitoring, and third-party assessments are completed, including Human Rights Impact Assessments commissioned externally to evaluate risks associated with key contractors.
- **Grievance mechanisms:** Employees, contractors, and community members can raise human rights concerns through site-level grievance mechanisms or the Company's confidential whistleblower hotline.
- **Transparency and accountability:** Annual externally assured progress reports are produced on conformance against the World Gold Council's Responsible Gold Mining Principles. Calibre communicates how impacts are addressed in its annual sustainability reports available on its website at <https://calibremining.com/esg/overview/#sustainability-2>.

In 2024, Calibre completed an external risk assessment at La Libertad Complex within the Nicaragua Reporting Entity. Calibre developed a gold sourcing management system, including a Responsible ASM Ore Sourcing Policy and an Ore Supplier Code of Conduct, aligned with OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area. Key measures include regular site inspections, supplier training on child labor laws, corrective action protocols, and continuous monitoring. Calibre is refining its system, with an internal audit planned for 2025 to ensure compliance and effectiveness. The Company is also exploring opportunities to partner with local organizations to support the elimination of child labour in ASM and to build alternative livelihood programs.

## Remediation

Calibre uses its reasonable best efforts to manage the risks discussed above, including by conducting due diligence exercises to proactively identify and address human rights risks to people in its business and value chain. The Company expects its employees, contractors, and community members to raise human rights concerns through site-level confidential grievance mechanisms or the Company's whistleblower hotline. The Company will take immediate action to terminate any such arrangement should it become aware that such methods are being supported or enabled by one of its business partners. These measures reflect Calibre's dedication to responsible and ethical business practices.

In 2024, 25 suppliers underwent social impact assessments, with one instance at the Reporting Entities identified as having significant actual or potential negative social impacts. ASM suppliers at La Libertad Complex posed a high risk of child labor and exposure of young workers to hazardous conditions due to traditional artisanal mining practices. Calibre registered one case of child labour in one ASM site within its concessions in Nicaragua. As a result, the ASM collective was notified of its non-compliance, reminded of Calibre's Code of Conduct and established immediate corrective measures. Future inspections confirmed requirements were met and no evidence of recurrence has been identified.

Calibre recognizes that efforts to prevent and reduce the risks of forced labour and child labour can have the unintended consequence of contributing to a loss of income for the most vulnerable families. During the reporting period, the Company is not aware of any such case in its activities and supply chains.

## Training

The Nicaragua Reporting Entity completes on-boarding and annual refresher training for employees in relation to its Code of Business Conduct and Ethics, including the prohibition to employ children or utilise forced labour. Complementarily, at the Nicaragua Reporting Entity, a social performance induction and annual refresher training is mandatory for all employees and contractors. It includes a section on human rights based on the UN Guiding Principles, covering risks related to forced and child labour. At the Canada Reporting Entity, during employee onboarding, employees are advised of prohibitions on child and forced labour as part of Calibre's policy commitments.

In 2024, 100% of site-level employees at the Reporting Entities completed dedicated training, reinforcing our commitment to ethical business practices.

## Assessing Effectiveness

Calibre has policies and procedures in place to assess its effectiveness in ensuring that forced and child labour are not being used in its activities and supply chains. These include:

- Conducting annual reviews of corporate policies related to forced labour and child labour by the Board of Directors.
- Tracking and review of relevant performance indicators, such as workers ID to confirm compliance with age requirements; the number of suppliers that have completed the Integral Client Profile Forms and due diligence risk assessment; the number of contracts signed with precautionary clauses that prohibit child or forced labour; the number of suppliers that have provided written acknowledgment of Calibre's governance framework; the number of employees and contractors' workers that have completed mandatory training; the number of ASM sites inspected with evidence of presence of child labour to assess supplier adherence; and the number of cases reported and solved through various mechanisms for raising concerns.
- Stakeholder feedback, including worker interviews and community engagement.
- Partnering with an external organization to conduct an independent review or audit of the organization's actions:
  - External consultants are commissioned on a two or three-year cycle, to conduct human rights impact assessments covering activities of a Reporting Entity and those of key contractors for operations identified as high risk. During 2024, Human Rights Impact Assessment conducted at the Eastern Borosi Mine, ensuring 100% of operations part of the Nicaragua Reporting Entity assessed within the past three years.
  - Annual conformance against the RGMPs is externally assured. Independent limited assurance reports are available on Calibre's website at <https://calibremining.com/esg/overview/>.
  - The findings of these assessments were used to develop a country-wide action plan for Calibre's mines that are part of its Nicaragua Reporting Entity and to update the human rights risks in Calibre's corporate risks register.

Complementarily, in Nicaragua, monthly reports of transactions by the Reporting Entity, and semi-annual reports of compliance tasks executed within the reported period are submitted to the national Financial Analysis Unit. Mandatory annual audits are conducted, which include reviews of supplier files.

Additional information is disclosed in Calibre's annual Sustainability Reports and RGMP conformance reports available on Calibre's website at <https://calibremining.com/esg/overview/>.

## **Future Steps in 2025**

Calibre is strengthening its procurement framework by integrating lessons from external assurance reviews and stakeholder feedback. The 2024 RGMP assurance review and Human Rights Impact Assessment identified gaps at La Libertad Complex, including insufficient contract monitoring. In response, Calibre is enhancing due diligence processes, improving oversight controls, and reinforcing compliance measures in 2025. These actions ensure a more accountable, transparent, and ethical supply chain, reflecting Calibre's commitment to continuous improvement and responsible sourcing.

## **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 2024 reporting year.

I have the authority to bind Calibre Mining Corp.



Darren Hall  
President, Chief Executive Officer and Director  
May 30, 2025