



Annual Report:
Fighting Against Forced Labour and Child Labour
in Supply Chains Act (Canada)
For the Financial Year Ended December 31, 2025

1. Introduction

Hemlo Mining Corp. (TSXV: HMMC) (“**Hemlo**” or the “**Company**”) is committed to conducting its business affairs with honesty and integrity and in full compliance with all applicable laws, including laws intended to prevent forced labour and child labour in corporate supply chains and operations.

This annual report (the “**Report**”) is produced by the Company for the financial year ended December 31, 2025, pursuant to the requirements of section 11 of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This is a joint report made on behalf of the Company and certain of its subsidiaries as set forth in the table below (collectively, the “**Hemlo Reporting Entities**”, “**we**”, “**us**” or “**our**”).

| Hemlo Reporting Entities | Principal Activities |
|---------------------------------------|---|
| Hemlo Mining Corp. | Ultimate parent company. Provides management and oversight. Listed on the TSX Venture Exchange (TSXV) |
| Hemlo Mining Operating Corp. (“HMOC”) | Owns the Hemlo Mine |
| Williams Operating Corporation | Employs mine-site employees and provides services to HMOC |

2. Our Business, Structure, Activities and Supply Chains

Hemlo is a Canadian mining company, incorporated under the *Canada Business Corporations Act*. Its common shares are listed on the TSX Venture Exchange. The Company is focused on the exploration, development and production of gold. Through its direct and indirect wholly-owned subsidiaries, the Company owns and operates the Hemlo Mine near Marathon, Ontario.

As of December 31, 2025, the Hemlo Reporting Entities had a combined workforce of 294 employees, including active and inactive employees. The Company operate solely within Canada.

Hemlo’s supply chains include various contractors, consumables suppliers, equipment manufacturers, logistics providers and other service providers supporting its mining operations, and exploration and development activities. Hemlo’s suppliers are generally located or operate within North America and many such suppliers are large, multinational companies that can be



expected to have mature governance and legal compliance practices. As such, the risk of forced labour or child labour in Hemlo's supply chains has been assessed as being low.

3. Policies and Due Diligence Processes

Hemlo has established and maintains a Code of Business Conduct and Ethics (the "**Code**") that reflects the Company's commitment to lawful and ethical business practices, which would include not using forced labour or child labour in any of its supply chains or activities. The Code applies to all directors, officers and employees of the Company. Violations of the Code may result in corrective and/or disciplinary action up to and including termination of employment for cause or removal from office. Violations of the Code that involve illegal behaviour may be reported to the appropriate authorities.

Hemlo has also established and maintains a Whistleblower Protection and Investigation Policy (the "**Whistleblower Policy**") which enables any employee to submit a good faith report to the Company, without fear of dismissal or retaliation, of any suspected violations of the Code, the Company's other policies or laws generally applicable to the Company's activities. Such laws would include laws prohibiting the use of forced labour or child labour in supply chains or operations, such as the Act. Complaints may be made anonymously and confidentially. All questions and concerns are taken seriously and addressed promptly, and professionally, in accordance with the Whistleblower Policy.

Hemlo's new vendor on-boarding process includes a risk-based due diligence review, prior to doing business with any new vendor of goods or services. Hemlo engages a third-party service provider to screen potential new suppliers and deliver a risk report. Depending on the perceived risk level (e.g., location, nature of services, etc.), different levels of due diligence may be conducted. Such reviews would include a "basic" or "advanced" review of environment, social and governance (ESG) factors, including risks related to the use of forced labour or child labour. In certain cases, Hemlo may require applicable contracts to contain representations, warranties and covenants that the supplier has conducted and will conduct appropriate diligence on its own supply chains and that its goods and services have been and will be made without forced labour or child labour. Hemlo would reserve the right to immediately terminate any contract if it discovers that a supplier, its subcontractors or other participants in its supply chains have used forced labour or child labour in their supply chains.

Hemlo complies with local employment legislation with respect to its direct employees. Hemlo conducts pre-employment screening through a third-party service provider when hiring new employees, including confirmation of age and local employment eligibility. The level of screening varies by organizational level, but may include education/professional designation verifications, past employment verification, and/or criminal records searches.

4. Risk Assessment and Management

Hemlo recognizes that the risk of forced labour or child labour could exist within its supply chains, particularly in jurisdictions where labour protections and enforcement mechanisms may be limited. As part of its risk assessment, the Company considers the jurisdictions in which its suppliers operate, the nature of the goods or services being procured, whether subcontracting or labour-intensive manufacturing is used, and information that might otherwise be publicly available with respect to such suppliers. As noted above, the Company currently operates in northwestern Ontario, Canada and its direct supply chains operate predominantly within North America, in which labour and employment laws and oversight mechanisms are well-established.

Hemlo seeks to mitigate the risk of forced labour or child labour in its operations and supply chains through a combination of the Code and the Whistleblower Policy, supplier on-boarding procedures and new-employee on-boarding procedures, as noted above. The Company's 2026 workplan includes implementation of the Mining Association of Canada's Towards Sustainable Mining framework, which includes the prevention of child and forced labour protocol.

No instances of forced labour or child labour were identified during the reporting period.

5. Remediation Measures

During the financial year ended December 31, 2025, Hemlo did not identify any instances of forced labour or child labour in its activities or supply chains and therefore no remediation or income-restoration measures were required.

Hemlo will continue to monitor its activities and supply chains and, if any issues are identified regarding the use or potential use of forced labour or child labour, it will take appropriate remediation measures to eliminate the use of forced labour or child labour in its activities and supply chains, as well as to remediate any loss of income to the most vulnerable families that may result from such measures.

6. Training

Hemlo employees are made aware of the Code, Whistleblower Policy and other policies, including expectations with respect to ethical behaviour and conduct in all of Hemlo's activities and compliance with all applicable laws, including laws prohibiting the use of forced labour or child labour in supply chains or operations. Hemlo expects to evaluate opportunities to enhance employee training and new employee orientation regarding ethics and compliance matters, as its operations and supply chains evolve (e.g., through the creation and implementation of e-learning modules).



7. Assessing Effectiveness

Hemlo reviews its policies and procedures periodically to assess their effectiveness in establishing and maintaining ethical conduct and compliance with applicable laws, including laws prohibiting the use of forced labour or child labour in supply chains or operations, and mechanisms to enable the confidential, anonymous reporting of suspected violations of the Code or other policies. The Company will continue to monitor regulatory developments and industry practices to strengthen its approach over time.

8. Approval and Attestation

This Report was approved by the Board of Directors of Hemlo, on behalf of itself and each of the Hemlo Reporting entities, in accordance with subparagraph 11(4)(a) 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 this Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

DATED May 20, 2026

A handwritten signature in black ink, appearing to read "Jason Kosec", is written over a horizontal line.

Jason Kosec
President, Chief Executive Officer and
Director, Hemlo Mining Corp.

I have the authority to bind Hemlo Mining Corp.
and the Hemlo Reporting Entities