



ANTI-CHILD AND FORCED LABOUR POLICY

Dated July 15, 2024

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I. INTRODUCTION

The board of directors (the “**Board**”) of G Mining Ventures Corp. (“**GMIN**” or the “**Corporation**”) has adopted this anti-child and forced labour policy (this “**Policy**”) to affirm and document its commitment to preventing and reducing the risk of Modern Slavery (as defined herein) within its operations and supply chain. The Corporation has a zero-tolerance approach towards Modern Slavery.

II. SCOPE

This Policy applies to GMIN and its current and future subsidiaries and all of their respective directors, officers and employees, irrespective of jurisdiction (collectively, the “**GMIN Personnel**”), and for the purposes hereof, references to the Corporation or GMIN are deemed to include references to each of the foregoing.

This Policy further sets forth the standards of conduct that GMIN expects of its suppliers, contractors, representatives, service providers and any other third parties that work for or on behalf of GMIN, including their respective directors, officers, employees, suppliers, contractors and representatives that provide goods or services to GMIN or related to its business (collectively, the “**GMIN Suppliers**”, and collectively with the GMIN Personnel, the “**GMIN Subject Parties**”), through adherence to the Corporation’s third-party code of ethics and business conduct (the “**Third-Party Code**”).

III. INTERPRETATION

“**Act**” means the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) and any other applicable legislation that prohibits or requires reporting about Modern Slavery.

“**Compliance Officer**” means the vice president, legal affairs & corporate secretary of the Corporation, provided that GMIN may designate any other officer of the Corporation to act as Compliance Officer or to assist the Compliance Officer.

“**Child Labour**” means labour or services provided or offered to be provided by a person under the age of 18 years and that is provided or offered under circumstances that are mentally, physically, socially or morally dangerous, interferes with schooling, or is compulsory or Forced Labour (as defined herein).

“**Forced Labour**” means labour or services provided or offered to be provided by a person that is against his or her will, that is performed under threat or punishment, or which is not provided voluntarily.

“**Modern Slavery**” means Child Labour and/or Forced Labour.

IV. COMMITMENTS

A. Prevention and Reduction of the Risk of Modern Slavery

The Corporation is committed to conducting its activities and business not only in compliance with all applicable laws, rules and regulations, but also in such a way as to prevent Modern Slavery in its operations and to help prevent and reduce the risk of Modern Slavery in its supply chain.

B. Transparency

Pursuant to the Act, GMIN is legally required to report annually about the measures taken to prevent and reduce the risk of Modern Slavery in its operations and supply chain, as further set forth in Section VI, and the Corporation is committed to ensuring the transparency of its approach in fighting Modern Slavery within its operations and supply chain.

C. Continuous Improvement

The Corporation is committed to applying a continuous improvement approach to the way it prevents and reduces the risk of Modern Slavery in its operations and contributes to preventing and reducing the risk of Modern Slavery in its supply chain. Accordingly, GMIN may, as its Compliance Officer considers appropriate: (i) seek feedback from GMIN Subject Parties about the success of its efforts in preventing and reducing the risk of Modern Slavery; (ii) establish processes and key performance indicators to monitor the effectiveness of measures taken to comply with this Policy; and (iii) ensure that all appropriate GMIN Personnel receive training on this Policy and on Modern Slavery.

V. RESPONSIBILITIES

A. Risk Assessment and Management in Operations

The Corporation will carry out periodic risk assessments to determine which portions of its operations are at risk for Modern Slavery. The Compliance Officer will determine any necessary corrective measures and areas of improvement.

B. Risk Assessment and Management in Supply Chain

The Corporation will carry out periodic risk assessments to determine which portions of its supply chain are at risk for Modern Slavery. In evaluating the risk of Modern Slavery in its supply chain, the Corporation will assess the following:

- the various categories of GMIN Suppliers in its supply chain;
- the level of spending in each category;
- whether the sourcing is direct or indirect;
- whether the supply of goods or services involves lower-skilled workers;

- whether the sourcing involves products or countries with a higher risk of unethical labour practices; and
- any other factor deemed relevant to this assessment by the Corporation.

Any GMIN Suppliers who present a higher risk of Modern Slavery will be required to complete an attestation in a form considered appropriate by the Compliance Officer.

The Corporation will incorporate its Modern Slavery commitments in its GMIN Supplier selection and contract management. Contracts with any GMIN Suppliers who present a higher risk of Modern Slavery should include, as appropriate, (i) a specific prohibition against the use of Modern Slavery in their operations and supply chain, (ii) a right of termination in the event of non-compliance with such prohibition, and (iii) a right of audit and inspection.

C. Due Diligence Requirements

In any potential merger, acquisition, joint venture or any other transactions of a similar nature where there is a higher risk of Modern Slavery, the Corporation shall incorporate compliance with the Act or equivalent legislation pertaining to Modern Slavery in other jurisdictions, other applicable laws and this Policy in its due diligence process.

VI. REPORTING UNDER THE ACT

On an annual basis, the Compliance Officer will coordinate the preparation of a report with respect to Modern Slavery, as set forth in the Act. The environment, social & governance committee of the Board (the “**ESG Committee**”) will oversee the preparation thereof and upon its approval with respect to the contents thereof, such report will be circulated to the Board for final approval.

Such report shall be dated as of May 31st in each year and shall include the following information in respect of the Corporation:

- the steps taken during the Corporation’s previous financial year to prevent and reduce the risk that Modern Slavery is used at any step of the production of goods in Canada or elsewhere by the Corporation or of goods imported into Canada by the Corporation;
- its structure, activities and supply chains;
- its policies and its due diligence processes in relation to Modern Slavery;
- the portions of its operations and supply chain that carry a risk of Modern Slavery being used and the steps it has taken to assess and manage that risk;
- any measures taken to remediate any form of Modern Slavery;
- any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of Modern Slavery in its activities and supply chains;
- the training provided to GMIN Personnel on Modern Slavery; and

- how the Corporation's assesses its effectiveness in ensuring that Modern Slavery is not being used in its business and supply chains.

Upon approval of such report by the Board, such report shall be published on the Corporation's website and circulated to the Minister of Public Safety and Emergency Preparedness.

VII. REPORTING VIOLATIONS AND DISCIPLINARY MEASURES

It is the responsibility of all GMIN Personnel to comply with applicable law and this Policy. Non-compliance with this Policy is ground for immediate disciplinary action, as further set forth in the whistleblowing policy of the Corporation (the "**Whistleblowing Policy**"). Any violation of this Policy may also violate applicable laws and if it appears that GMIN Personnel may have violated such laws, the Corporation may refer the matter to the appropriate regulatory authorities.

GMIN Personnel have an obligation to immediately report any situation of known or suspected acts of misconduct or other violations of this Policy (any such event being referred to as an "**Incident**") to their immediate supervisor and/or the Compliance Officer. GMIN Personnel who find their concerns about an Incident not satisfactorily addressed by such report pursuant to the procedures set forth in this Policy or who feel that the seriousness and sensitivity of the issues or people involved require that the reporting of such questionable event should neither be addressed to the attention of their immediate supervisor nor the Compliance Officer should file a complaint in accordance with the procedures set forth in the Whistleblowing Policy.

The Corporation does not tolerate acts of retaliation or retribution. GMIN will ensure the protection from any form of retribution or retaliation made against any individual as a result of any good faith report of an Incident. GMIN Personnel found to have retaliated, or sought retribution, against any individual for having made a good faith report of known or suspected Incidents, even if such report is ultimately mistaken, will face disciplinary action, as further set forth in the Whistleblowing Policy.

Any such Incident includes, without limitation, any situation where the Corporation or a GMIN Supplier uses Child Labour and/or Forced Labour in its operations or supply chain.

VIII. QUESTIONS

A copy of this Policy shall be provided to all GMIN Personnel.

Unless otherwise specified herein, any questions with respect to the interpretation or application of this Policy must be directed to an immediate supervisor or to the Compliance Officer at: mdagenais@gminingventures.com.

IX. REVIEW

On an as-needed basis, the ESG Committee shall (i) review this Policy, including by assessing its effectiveness, and recommend any changes to this Policy to the Board for approval; and (ii) monitor, in collaboration with the Compliance Officer, the implementation of this Policy, including

with respect to the appropriateness of the control systems in place for assuring adherence thereto. The Board may also amend this Policy, as required.

X. EFFECTIVE DATE

This Policy was adopted by the Board on July 15, 2024.