



WEST RED LAKE

GOLD MINES

Modern Slavery Report for the Year ended December 31, 2025

Introduction

West Red Lake Gold Mines Ltd. (“WRLG” or the “Company”) has prepared this Modern Slavery Report (the “Report”) pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023) (the “Modern Slavery Act”) for the financial year ended December 31, 2025.

This is a joint report made under Section 11 of the Act on behalf of WRLG and its wholly owned subsidiaries, Red Lake Madsen Mine Ltd. (“RLMM”) and West Red Lake Gold Mines (Ontario) Ltd (“Rowan”). This report generally applies to WRLG, RLMM and Rowan, except where specifically indicated.

WRLG recognizes that forced and child labour can take many forms, including human trafficking, indentured servitude, forced labour, forced marriage, debt bondage, child labour and deceptive recruiting practices (collectively, “Modern Slavery”). We acknowledge that there are risks of Modern Slavery in all industry spaces, including the mining industry, and accordingly, industry players have an important role in assessing, mitigating and preventing the risk of Modern Slavery in Canada’s supply chain.

For WRLG, this begins with our commitment to carry on our business honestly and with integrity, using high ethical standards, while protecting the health, safety and wellbeing of our employees, the environment, and the communities in which we work. WRLG aims to work with business partners that share these commitments and values. To ensure this is the case, we are committed to continuous improvement in our due diligence, risk assessment, and training processes to continually assess, mitigate and prevent the risk of Modern Slavery in our supply chain.

WRLG’s Corporate Structure, Activities and Supply Chains

Corporate Structure

WRLG, Rowan, and RLMM are each a corporation organized under the laws of British Columbia, Canada, with a head office located at Suite 3130 595 Burrard Street, Vancouver BC V7X 1L3. WRLG trades on the TSX-V under the symbol “WRLG”. RLMM and Rowan are wholly owned subsidiaries of WRLG. 2025 is the first year in which WRLG, Rowan, and RLMM became an “entity” with reporting obligations pursuant to the Modern Slavery Act.

As of December 31, 2025, WRLG employed (either directly, or indirectly through its wholly owned subsidiaries Rowan and RLMM) approximately 250 employees, almost all of whom were employed on a permanent basis. Nine employees are based in the head office in Vancouver, Canada, and the remainder in our Red Lake Mine Site in Northern Ontario.

Group Activities

WRLG is a Canadian gold producer, advancing its Red Lake Madsen Mine in Ontario. Following the first pour of gold and silver in March 2025, WRLG has successfully transitioned from a development company to an operating company, with a focus on safe disciplined execution, operational excellence and creating long-term value for shareholders. WRLG respects the rights and interests of Indigenous Nations. The Company is dedicated to building relationships founded on trust, respect, and integrity, and is committed to unlocking the value of its assets in a manner that benefits Indigenous Nations and the communities where WRLG operates. WRLG’s primary focus is the continued ramp-up of production at Red Lake Madsen Mine.

Supply Chains

All of WRLG's procurement activities occur through its purchasing department, located at either the Vancouver head office, or at the Red Lake Madsen Mine Site. WRLG engages with a variety of suppliers and service providers, to procure a range of goods and services to support our exploration, construction, mining, processing, transportation, sustainability and environmental protection and monitoring activities. The supply chain and contract functions are managed by our Vice President of Operations, with operational oversight and governance by the Chief Financial Officer. Most of WRLG's procurement activities are governed by standard terms and conditions maintained by our purchasing department. For major procurement activities, potential suppliers must pre-qualify with the Company, demonstrating, among other things, its policies and processes regarding health, safety, environment, ethical business practices, management of subcontractors, sustainability and employee relations. Only qualified businesses are invited to engage in tendering processes with the Company.

WRLG is continuing to develop policies and processes related to the purchase of goods and services that provide additional guidance and standards to help us manage all risks, including Modern Slavery Risks, present in our supply chain. This includes providing rules and guidelines to formalize cost efficiencies, accountability while prioritizing local and indigenous procurement and ethical business practices. WRLG's Supplier Code of Conduct, that applies to all suppliers that provide goods and services to the Company was a key policy development.

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When measured by value, 98% of WRLG's total procurement expenditure occurred within Canada. The remaining 2% of procurement expenditure occurred primarily within the United States, with no procurement expenditure with suppliers from the ten countries reputed to have the highest prevalence of modern slavery.

WRLG's Governance, Policies and Due Diligence Processes

Governance

Subject to its constating documents and applicable law, the board of directors of WRLG (the "Board") has a responsibility for the stewardship of the Company, including the responsibility to supervise the management of and oversee the conduct of the business of the Company, provide leadership and direction to management, set policies appropriate for the business of the Company and approve corporate strategies and goals. The Board has constituted four committees: the Audit Committee, the Technical Safety and Sustainability Committee ("TSSC Committee"), Corporate Governance and Nominating Committee ("GNC Committee"); and the Compensation Committee. Each committee of the Board oversees risks within their functional area. WRLG's Technical Safety and Sustainability Committee oversees our activities with respect to health, safety, environment and social performance, guided by applicable law along with leading performance and risk management standards. As such, the GNC Committee has general oversight of Modern Slavery Risks.

WRLG's senior leadership has responsibility for risk management, including Modern Slavery Risks. WRLG's procurement team works to identify, assess and manage Modern Slavery Risks in our supply chains. Similarly, the Company's legal advisors and human resources team work together to identify, assess and manage Modern Slavery Risks in our workforce.

Policies and Due Diligence

All employees, contractors, officers and directors are expected to follow WRLG's commitment to health, safety and sustainability, and adhere to our suite of corporate policies. The Board of Directors has established a Code of Conduct and Ethics Policy (the "Code"), which provides the guidelines for employee behaviour and establishes the basis for open communication. The Code generally ensures that the Company's business and affairs are undertaken honestly and with integrity, using high ethical standards, in compliance with the laws of each jurisdiction in which we do business. Employees and contractors are expected to conduct the Company's operations with a view to respecting and enhancing the economic and social situations of the communities in which we operate. We are committed to using reasonable efforts to ensure that the companies and individuals with which the Company does material business also observe high ethical standards. Our Supplier Code of Conduct, that applies to all suppliers that provide goods and services to the Company includes requirements related to human rights and labour in our supply channel, including prohibitions on Modern Slavery and requirements regarding health and

safety, and commitment to our local and indigenous communities is considered integral to promoting high ethical standards of engagement.

The Board has also established the Environmental and Social Responsibility Policy (“ESR Policy”) and the Health and Safety Policy (“HS Policy” and collectively the “ESRH Policies”). The ESRH Policies outlines how WRLG and covered persons, including directors, officers, employees, consultants, and contractors, will conduct business safely, in an environmentally responsible manner, and to a high-level standard of corporate responsibility. Employees, officers, directors and contractors are expected to comply with the policies as well as applicable safety and environmental laws and regulations in the locations where WRLG operates. We recognize that aspects of our business may directly, indirectly, or cumulatively impact the communities we are associated with (including vulnerable groups), and strive to minimize risks to community health, safety and security by implementing appropriate collaborative planning and mitigation measures.

As part of its Corporate Governance practices, WRLG has a process established under the Whistle Blower Policy that allows employees, officers, and consultants throughout the organization (either directly or anonymously) to report any unethical or illegal activity without fear of reprisal from their fellow employees, a supervisor or other Company officials. The Whistler Blower Policy has been written and distributed to ensure that employees acting in good faith have the means to report actual or potential violations of our policies. As per the Whistle Blower Policy, there will be no reprisals against employees, officers or directors for reporting violations.

WRLG’s Workplace Bullying and Harassment Policy outlines the Company’s commitment to creating and maintaining a work environment in which all individuals are treated with respect and dignity. It ensures our work environment is safe, promotes equal opportunities, prohibits discriminatory practices and be free of harassment, violence and other breaches of human rights. This policy provides an avenue for all employees to raise concern, complaint or a fair treatment matter about any action, decision or behavior that adversely impacts them. In addition, the Company has a Diversity and Inclusion Policy which encourages diversity within our corporate culture.

Now that WRLG is ramping up operations at its Red Lake Madsen mine and transitioned from project development to an operating company, it is in the process of developing and implementing policies and processes related to the purchase of goods and services that provide additional guidance and standards to help us manage risks, including Modern Slavery Risks, present in our supply chain. This includes providing rules and guidelines to formalize cost efficiencies and accountability while prioritizing local and indigenous procurement and ethical business practices. We implemented a Supplier Code of Conduct, that applies to all suppliers that provide goods and services to the Company, and includes requirements related to human rights and labour in our supply channel, including prohibitions on Modern Slavery and requirements regarding health and safety, and commitment to our local and indigenous communities.

Business and Supply Chain Risks Risk

WRLG recognizes the importance of identifying and managing risks related to modern slavery and/or child labour within operations and the supply chain. The Company’s approach is guided by its values and Code of Conduct and Ethics Policy, which emphasizes compliance with all applicable laws, ethical sourcing, and respect for human rights.

WRLG generally conducts annual risk reviews in collaboration with senior leadership and the Board of Directors. This review includes an assessment of human rights risks and impacts, which are monitored on an ongoing basis to support continuous improvement.

In reviewing potential areas of modern slavery risk, WRLG may consider the following factors:

Geographic risks: WRLG’s workforce is in Canada only and primarily uses Canadian and U.S. suppliers, which are generally considered low-risk jurisdictions. Given the international nature of some supply chains, WRLG remains vigilant in ensuring ethical sourcing and responsible business practices.

Sector risks: The mining sector is recognized as having heightened risks related to forced labor, poor working conditions, and exploitation, particularly in remote areas and certain geographies. WRLG acknowledges these sector-specific vulnerabilities and applies enhanced oversight and/or due diligence where appropriate.

Product and service category risks: Based on a preliminary review of industry-wide practices, the following categories may potentially pose elevated risks due to the nature of their workforce or sourcing practices:

Labour brokers and third-party labour service providers, including catering, janitorial, camp service, security, construction, and infrastructure

Suppliers of raw materials and chemicals (e.g., cyanide, explosives, reagents) and/or personal protective equipment

WRLG does not consider its operations to carry a significant risk of Modern Slavery, given the location of our workforce and our human resource policies and procedures. Our workforce largely consists of skilled, qualified and experienced individuals employed in Canada. We have several internal controls designed to protect the health and safety of our employee base, including our Health and Safety Policy, Workplace Bullying and Harassment Policy and our Whistleblower Policy discussed above.

To date, WRLG has not identified any confirmed instances of forced or child labour within its operations or direct supply chain. However, the Company remains committed to strengthening its risk management processes, including implementing a formal supplier risk assessment and enhancing due diligence practices.

Remediation Measures

WRLG's focus to date has been to undertake an initial review and scoping exercise of our supply chain to identify risks and build out the operational policies and processes to continue to help us manage risks, including Modern Slavery Risks, present in our supply chain. As the initial review and scoping exercise has not identified a significant risk of Modern Slavery, we did not implement any remediation measures in 2025.

Training

WRLG's governance policies, as outlined above, ensure that the Company's business and affairs are undertaken honestly and with integrity, using high ethical standards, in compliance with applicable laws, and that we maintain a work environment in which all individuals are treated with respect and dignity. All employees are required to read and agree to the terms of the Code of Conduct and Ethics Policy and are required to complete annual policy training and signoff.

Assessing WRLG's Effectiveness

WRLG commits to ongoing assessment regarding its effectiveness in ensuring that Modern Slavery is not used in its business and supply chains. This assessment will include:

Regular review of our internal policies and procedures related to Modern Slavery.

Regular review of our standard form of templates to ensure appropriate terms and conditions are implemented to assess, manage, and mitigate Modern Slavery Risks.

Tracking and investigating all complaints related to Modern Slavery Risks received via the Whistleblower Policy, described above.

WRLG recognizes that Modern Slavery is a complex issue that requires joint effort between the Company and its suppliers and service providers. Our business relationships are essential in developing creative solutions to Modern Slavery Risks, and we are committed to deepening our long-term relationships with our suppliers and service providers to combat those and other supply chain risks. We will continue to identify and proactively mitigate against emerging risks and will further develop and implement policies and processes related to the purchase of goods and services that provide additional guidance and standards to help us manage risks, including Modern Slavery Risks, present in our supply chain.

Report Approval and Attestation

This report was approved by the Board of Directors of WRLG on May 26, 2026 on behalf of itself, Rowan, and RLMM pursuant to section 11(4)(b)(ii) of the Act.

I have authority to bind WRLG Inc., Rowan and RLMM Ltd.



Shane Williams

Chief Executive Officer