



**TOREX GOLD RESOURCES INC.**



# FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

Report for the Financial Year Ended December 31, 2025

## INTRODUCTION: OUR COMMITMENT TO RESPONSIBLE MINING AND THE PROTECTION OF HUMAN RIGHTS

The following report (the “**Report**”) has been prepared by Torex Gold Resources Inc. (“**Torex**,” “**Torex Gold**” or the “**Company**”) in accordance with reporting requirements under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for the financial year ended December 31, 2025. As this is the Company’s third report under the Act, we remain committed to continually improving our disclosures and strengthening our efforts to assess and mitigate the risks of forced and child labour across our operations and global supply chain.

Our commitment to responsible mining is grounded in our organizational purpose statement: *To transform finite mineral resources into lasting prosperity by positively impacting all the lives we touch.* For Torex, implicit in this statement is a deep commitment to respect and protect the rights of all of those connected with Torex directly through our operations and more broadly through our business relationships in Canada, Mexico, USA and the other jurisdictions where we procure goods and services.

This Report is organized according to the information required by the Act, and describes the specific actions, policies and programs that support the mitigation of risks associated with forced labour and child labour. The Company remains committed to transparency in our approach as we move forward in this regard.

## CORPORATE STRUCTURE AND ACTIVITIES

Torex Gold is a Canadian mining Company primarily engaged in the exploration, development, and production of gold, silver, and copper from its flagship Morelos Complex in Guerrero, Mexico. The wholly-owned property spans over 29,000 hectares within the highly prospective Guerrero Gold Belt in Mexico, situated 180 kilometers southwest of Mexico City.



The Company is headquartered in Canada, with our corporate office located in Toronto, Ontario. The Company is a corporation governed by the *Business Corporations Act* (Ontario). The Company’s common shares are listed on the Toronto Stock Exchange under the symbol TXG.

In August 2025, Torex acquired interests in a portfolio of early-stage exploration properties including the Gryphon and Medicine Springs in Nevada, USA, and Batopilas and Guigui in Chihuahua, Mexico.

In October 2025, Torex acquired 100% ownership of the development-stage Los Reyes gold-silver project located in Sinaloa, Mexico. A preliminary economic assessment is currently underway for Los Reyes which is expected to be delivered by mid-2026.

In 2025, our workforce consisted of 1,570 employees and 2,737 contractors, of which 55 were corporate office employees based in Canada. We are proud that 99% of our direct operational workforce is from Mexico, with 64% of our employees from Guerrero State. In 2025, 7%

of our employees in Mexico were covered by a collective bargaining agreement.

The Company's primary mining asset is the Morelos Complex, which includes the El Limón Guajes ("ELG") underground mine, processing plant and related infrastructure, the Media Luna underground mine, which was completed in 2025, and the Media Luna North (formerly EPO) Project currently under development with first production expected by the end of 2026.

The Morelos Complex produced 376,364 gold equivalent ounces in 2025. Following the declaration of commercial production at our Media Luna Project in May 2025, the Company now produces a combination of gold doré bars and precious-metal-rich copper concentrate. Gold doré bars require refining to become a marketable material, and the Company holds two contracts for refining of gold doré. One contract is shared between two affiliated refineries, Asahi Refining USA Inc. and Asahi Refining Canada Ltd, located in the United States and Canada, respectively, for 75% of its doré. A second contract for the remaining 25% is with MKS PAMP SA, with operations in Switzerland and India. Copper Concentrate is transported off-site for sale under long-term offtake and logistics arrangements.

The Company has the following material subsidiaries:

Company	Jurisdiction of Registration	Principal Business
Caymus Holding S.à r.l.	Luxembourg	Holding Company
Groth Holding S.à r.l.	Luxembourg	Holding Company
TGRXM, S.A. de C.V.	Mexico	Holding Company
Minera Media Luna, S.A. de C.V.	Mexico	Mining Operations

This is a joint Report made under section 11 of the Act on behalf of the Company and its operating subsidiary, Minera Media Luna, S.A. de C.V., each of which has been determined to be a reporting entity (collectively, the "**Reporting Entities**"). In this Report, references to "Torex", "Torex Gold", the "Company", "we", "us", "our" and similar expressions include the Reporting Entities, unless the context suggests otherwise.

## TOREX GOLD'S SUPPLY CHAIN

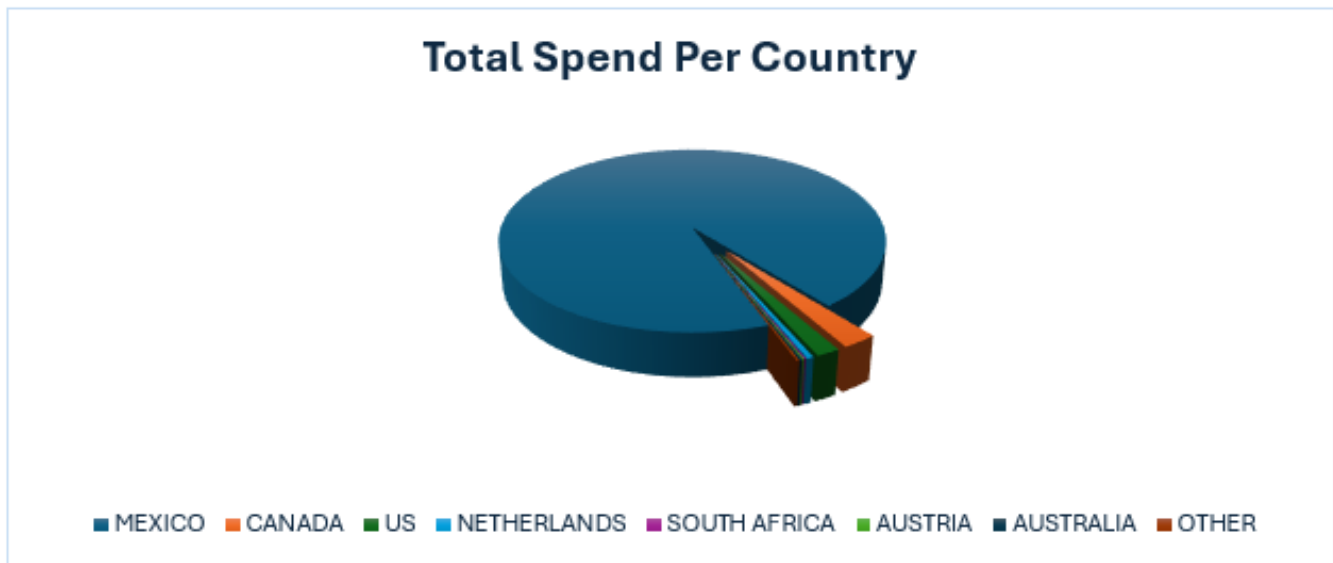
Torex recognizes the critical importance of effective supply chain management in supporting our operations and fulfilling our commitment to sustainable business practices and the fundamental respect of human rights. Strategic and ethical sourcing are fundamental to our operations, and are supported by robust procurement systems, contractual requirements, and governance oversight.

To ensure our partners live up to the Responsible Mining standards expected by the Company, Torex maintains a [Supplier Code of Conduct](#), endorsed by the Safety, CSR and Technical Committee of the Torex Board of Directors. The Supplier Code of Conduct establishes the minimum standards of conduct expected of Suppliers in all business activities conducted with or on behalf of the Company and its subsidiaries. The Code requires compliance with all applicable labour, employment, taxation, and human rights laws and explicitly prohibits the use of forced labour and child labour, as defined by applicable legislation, at any stage of production or in connection with imported goods.

All standard Torex contracts require suppliers to read, understand, and agree to comply with the provisions of the Supplier Code of Conduct.

In 2025, Torex worked with 1291 direct suppliers, with approximately 75% of those suppliers located in Mexico, reflecting the Company's commitment to supporting local and regional businesses.

Procurement from vendors in Mexico represented 95% of total procurement spend in 2025, equivalent of US \$687.5 million of Torex's \$726 million total procurement spend for the year. The remaining procurement spend was primarily attributable to suppliers located in Canada (2.5%), United States (1.7%), the Netherlands (0.5%), and South Africa, Austria, and Australia (each approximately 0.1%), with other jurisdictions collectively representing less than 0.2% of total spend, as shown in the chart below.



Torex's procurement spend in 2025 was concentrated in categories closely linked to mining operations and support services, including construction services and materials (25%); industrial equipment, parts and accessories (18.5%); production consumables and bulk materials (15%); professional mining services (14.5%); support and administrative services (14%); non-production consumables (4%); maintenance and repair services (3%); fuel and electricity (2%); transport, logistics and warehousing services (2%); technology, laptops, computers and mobile phones (1%); protective equipment and apparel (0.5%). The remaining 0.5% of total spending is related to other materials and services acquired during the year.

Given the labour-intensive nature of mining activities, Torex applies a risk-based approach to supply chain oversight, with enhanced attention on jurisdictions and service categories that are inherently more exposed to labour-related risks, including construction, logistics, maintenance, and other services. Torex considers country-of-origin risk, sector-specific risk, and supplier profile as part of its supplier onboarding and contracting processes, where the Company has the greatest ability to set expectations and apply contractual requirements. While Torex's due diligence activities are primarily focused on its direct (Tier 1) suppliers, the Company acknowledges that labour-related risks may also exist further upstream in the supply chain and continues to evaluate opportunities to enhance its approach to supply chain risk management over time.

## **POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR**

Due diligence processes at Torex involve embedding responsible business conduct into our governance structure, corporate policies, and internal management systems and approaches. As part of a robust risk management

system, we also identify and assess the risk of adverse impacts to our business including human rights, and, where necessary, seek to cease, prevent, or mitigate those risks through effective and documented controls that are regularly reviewed. Any adverse impacts, complaints and/or violations can be reported through our Whistleblower Hotline and/or our grievance mechanism, and the Company is committed to address issues and cooperate in remediation if and where appropriate through those processes.

The Company is in full conformance with the World Gold Council's Responsible Gold Mining Principles (RGMPs). Conformance with this standard serves to strengthen the Company's governance and transparency with respect to responsible mining practices and provides additional confidence to our investors that we are delivering on our financial and operational commitments with the highest level of ethics and corporate social responsibility. Sub-principle 6.3 specifically references that members must prohibit child labour, forced labour and modern slavery in operations and supply chains. In 2025, the Company continued to demonstrate ongoing compliance and continuous improvement with respect to the RGMPs, as evidenced in the Company's [Responsible Gold Mining Principles Year 5 Conformance & Continuous Improvement Report](#), which includes limited third-party assurance.

In 2025, the Company also issued its third [Conflict Free Gold Report](#), including [independent limited assurance](#), which confirms our commitment and declaration that our gold is produced in a manner that does not cause, support or benefit, unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law, which includes forced labour and child labour.

## Governance

The Safety, CSR and Technical Committee of the Board is responsible for overseeing the Company's corporate responsibility strategy, which includes maintaining a healthy and safe workplace, environmentally sound and responsible resource development, good community relations, and the protection of human rights and associated risks, as reflected in its [mandate](#).

At the executive level, the President and Chief Executive Officer ("CEO") has overall accountability for ensuring risks related to human rights are managed appropriately. The Senior Vice President, Human Resources, ESG and Communications, who reports directly to the CEO, is responsible for the Company's ESG strategy and framework, which includes policies and programs supporting the protection of human rights and the identification and mitigation of risks related to child labour and forced labour. Overall accountability for managing human rights risks within Mexico rests with the Senior Vice President Mexico, who also reports to the CEO and is a member of the Executive Team. The role is responsible for ensuring that human rights considerations are integrated into operational decision-making and site-level practices.

The Company has established an internal sustainability committee known as the "Responsible Mining Working Group", comprised of leaders from both the corporate office and operations. The mandate of the group is to support and advance responsible mining and sustainability practices across the organization. A "Responsible Supply Chain" sub-group was subsequently established in 2023 to strengthen strategies, processes, and systems related to supply-chain due diligence and to enhance confidence that suppliers and contractors are in alignment with the Company's expectations and standards of conduct related responsible mining. The ongoing identification, assessment, and mitigation risks related to forced labour and child labour within the supply chain form part of the ongoing mandate of this sub-group.

## Corporate Responsibility Policies

Our approach to doing business is guided by a set of policies that are applicable across our entire organization and designed to ensure that individuals are aware of their responsibilities and expectations regarding conduct and behaviour. The policies are developed by executive management and approved by our CEO and Board of Directors. Our main policies in relation to the protection of human rights, and by extension the prevention of forced labour and/or child labour, are as follows:

- Our [Code of Business Conduct and Ethics](#) affirms the commitment of the Company to conduct its business and affairs in alignment with our core values, while also specifying the behaviour expected from all levels of the organization, including the Board of Directors. The policy commits to foster a work environment that is safe and healthy and free of discrimination, harassment, intimidation, and hostility of any kind and to obey all laws governing the conduct of the business and affairs of the Company. It also provides a mechanism for reporting violations to the code through the corporate Whistleblower Policy.
- Our [Human Rights Policy](#) affirms our commitment to the protection of workers and human rights in our management systems and behaviours. The policy explicitly prohibits forced labour and child labour and commits that the Company will regularly review and audit our performance, and that of our supply chain, on security and human rights matters relative to our stated policies and standards.
- Our [Whistleblower Policy](#) promotes openness and transparency and sets out procedures through which anyone connected with the Company, including employees, contractors, vendors and community members can submit a complaint regarding potential wrongful behaviour. Retaliation against an individual who submits a complaint in good faith is strictly prohibited.

The Company's [Supplier Code of Conduct](#), also clearly establishes the minimum standards of conduct expected from our Suppliers, including all entities that provide goods or services to the Company, including contractors, vendors, and advisors. Suppliers must ensure the same of any affiliates, agents, subcontractors, intermediaries, or those who work for them. The policy explicitly prohibits the use of forced labour and child labour, as defined by applicable legislation, at any stage of production or in connection with goods imported. The document also sets standards of conduct and includes a number of provisions relating to human rights and ethical labor practices, including the following:

- Suppliers must not employ children below the minimum legal age where the work is performed and are expected to take proactive measures to assess, prevent, and mitigate the risk of forced or child labour within their own supply chains.
- Suppliers must ensure fair and appropriate terms of employment as defined by applicable legislation, including working hours and remuneration, and must support fundamental rights at work, such as freedom of association and the right to collective bargaining.
- All forms of forced labour, human trafficking, modern slavery, and other inhumane treatment including physical, moral, sexual or verbal abuse, bullying, or intimidation are strictly prohibited.

## Internal Management Systems and Approaches

The following internal management systems and approaches contribute to the protection of human rights and workers' rights and, by extension, the prevention and reduction of risks associated with forced labour or child labour as part of the business activities of Torex.

**Reglamento Interior de Trabajo:** Torex maintains a Reglamento Interior de Trabajo (the "**Reglamento**"), which are internal working regulations that define how the Company will align with, or exceed, Mexican labour laws. The Reglamento includes, among others, the following provisions:

- Company commitments to respect the rights of workers as defined in Mexican legislation, including the international human rights conventions Mexico is party to;
- Minimum age requirements, which in Mexico is 18, thereby prohibiting child labour in our workforce;
- Working hours policy, including provisions for overtime pay;

- Provisions for the fair payment of wages and salaries as well as vacation entitlements;
- Health and safety provisions, including the right to refuse unsafe work;
- Equal protection provisions for men and women, including for pregnant and breastfeeding women; and
- A grievance mechanism to resolve complaints fairly and effectively.

**Fair Treatment System (internal):** We maintain a 'Fair Treatment System' within the Company, the purpose of which is to resolve employee complaints about perceived unfair treatment in the workplace and ensure fair resolution through a set of established policies and procedures.

**Whistleblower Hotline:** As set out in our Whistleblower Policy referenced above, the Company maintains a Whistleblower Hotline, through which anyone, including all employees, contractors, vendors and members of the public, can submit a complaint regarding potential wrongful behaviour. Complaints can be submitted anonymously, and all complaints are treated confidentially. In 2025, the Company received six complaints through the whistleblower channel, none of which were associated with forced labour or child labour issues.

**Grievance Mechanism:** In addition to the Company's Whistleblower Hotline, we maintain a grievance mechanism to understand and respond to community concerns. The mechanism is accessible to local residents, organized community groups, cooperatives, Ejido assemblies, and contractor-related parties, and submissions are accepted in writing, by phone, by email, or in person. It is intended to address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all parties. Grievances are classified according to their severity of impact and are subject to corresponding management controls to streamline Company responses and enable effective resolution. The grievance mechanism contains a commitments tracker system to digitally document and register all complaints. The grievance mechanism may also be used by stakeholders to address grievances against contractors and subcontractors. In 2025, there were 10 grievances received, none of which were related to concerns regarding forced labour or child labour.

**Supplier Onboarding and Contractual Compliance:** In 2025 the Company implemented its vendor due diligence through the SAP Ariba platform. SAP Ariba improves supplier onboarding, contractor compliance management, and audit readiness by providing a centralized, standardized, and transparent system for collecting, validating, and monitoring vendor information. In addition to compliance with our Supplier Code of Conduct, our contractual clauses include a provision that the Contractor must ensure that the guidelines and policies of the Company are met, as well as applicable laws and official Mexican legislation. We also maintain a Contractor Management System that the Company established in 2022, which is intended to align contractor work and performance to Torex operational policies, procedures and systems with respect to health, safety and environmental management.

## IDENTIFYING POTENTIAL FORCED LABOUR AND CHILD LABOUR RISKS

### Enterprise Risk Management (ERM) Policy and Process

Torex maintains a formal ERM Policy, which is reviewed by the Board annually and sets out the Company's risk management philosophy and framework. The Board oversees the ERM Program and ensures that adequate controls are in place to manage the material risks. The CEO holds ultimate responsibility for the ERM Program, with authority to delegate to the CFO, Executive Team, and/or VP, Risk.

The ERM Framework supports the identification, evaluation, and management of risk across the Company, including human rights related risks. Risks are reviewed annually through structured risk workshops, and monitored on an ongoing basis, with key risks reported to the Board on a quarterly basis. The effectiveness of the key mitigation measures is assessed by the risk function, with a complementary Internal Audit function that provides independent

and objective assurance and advisory services to support the Company's governance, risk management, and internal control environment.

In 2025, forced labour and child labour risks were not identified as stand-alone enterprise-level risks. However, the Company acknowledges that such risks may arise within extended supply chains, particularly where labour-intensive services are performed in jurisdictions with higher levels of labour vulnerability.

### Human Rights Impact Assessment

In 2022, the Company engaged external human rights experts to undertake a comprehensive human rights impact and due diligence assessment. The assessment included an evaluation against the United Nations Guiding Principles on Business and Human Rights, as well as a review to identify potential human rights risks related to security and to assess the Company's conformance with the Voluntary Principles on Security and Human Rights ("VPSHR"). This assessment did not flag any significant risks associated with forced labour and child labour connected to our business activities.

### Internal Assessment of Risks associated with Forced Labour and Child Labour

Over each of the past three years, Torex has performed a risk-based internal self-assessment of potential forced labour and child labour risks across its supply chain. In 2025, this assessment covered 1,291 direct (Tier 1<sup>1</sup>) suppliers and considered a range of risk factors, including supplier jurisdiction, nature of the goods and services provided, relative spend, labour intensity, reliance on subcontracting, proximity to Torex operations, and publicly available risk indicators such as the Global Slavery Index and international Child Labour data<sup>2</sup>.

As part of this assessment, suppliers were grouped by country of operation, and inherent risk ratings were applied based on a combination of jurisdictional risk indicators and the profile of goods and services procured. The results of this country-level assessment are summarized in the table below, showing the number of supplier transactions by country and the corresponding overall forced labour and child labour risk rating.

Country	# Transactions	Overall forced labour and child labour risk rating (High / Moderate / Low)
Mexico	44,142	Moderate
Canada	2,318	Low
USA	646	Low
Netherlands	9	Low
South Africa	18	Moderate
Austria	17	Low
Australia	45	Low
Other (including Chile, Switzerland, United Kingdom, Italy, Singapore, Spain, France, Ireland, Peru, Uruguay, and Germany)	201	Moderate

Mexico was assessed as presenting a moderate inherent risk, reflecting sectoral and regional labour-market characteristics and the labour-intensive nature of mining-related activities. Other jurisdictions assessed as having moderate inherent risk represented a small proportion of total transactions and typically involved limited spend or specialized services. Suppliers located in Canada, the United States, Australia, Austria, and the Netherlands were

<sup>1</sup> Tier 1 suppliers are defined as those suppliers that provide goods and services to the Company directly.

<sup>2</sup> The following public sources have been used for the risk rating:

- [Global Slavery Index: https://worldpopulationreview.com/country-rankings/global-slavery-index-by-country](https://worldpopulationreview.com/country-rankings/global-slavery-index-by-country); and
- [UNICEF Child labour data: https://data.unicef.org/topic/child-protection/child-labour/#status](https://data.unicef.org/topic/child-protection/child-labour/#status)

assessed as low inherent risk, reflecting strong labour protections, regulatory oversight, and enforcement mechanisms in those jurisdictions.

Based on this multi-factor assessment, no suppliers or transactions were identified as high risk for forced labour or child labour during the reporting period.

To further contextualize these results, Torex also reviewed the types of goods and services procured, recognizing that labour-related risk is influenced not only by geography but also by the nature of procurement. The top 10 materials and goods, and top 10 services, by spend in 2025, are summarized below.

Top 10 materials and goods procured by spend	Top 10 services procured by spend
<ul style="list-style-type: none"> <li>• Sodium Cyanide</li> <li>• Sodium Metabisulfite</li> <li>• Fuel</li> <li>• Explosives and accessories</li> <li>• Cement</li> <li>• Spare Parts</li> <li>• Ground Support materials</li> <li>• Valves, pipes and accessories</li> <li>• Liquid Oxygen</li> <li>• Electrical Parts</li> </ul>	<ul style="list-style-type: none"> <li>• Mine Hauling services</li> <li>• Mine development services</li> <li>• Power supply and distribution</li> <li>• Drilling services</li> <li>• Civil Works</li> <li>• Catering</li> <li>• Bulk Transport</li> <li>• Blasting services</li> <li>• Security Services</li> <li>• Personnel transportation</li> </ul>

The assessment concluded that the majority of Torex's suppliers or service providers either operate in jurisdictions with strong labour and employment protections or provide professional, technical, or equipment-based services with lower inherent exposure to forced or child labour risks.

Notwithstanding this assessment, we recognize that other goods and services we procure with smaller expenditures could carry risks, and we are committed to ongoing due diligence of potential risks in this regard.

## MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

During 2025, no instances of forced labour or child labour were identified within the Company's activities or across its supply chains. In addition, no related concerns or allegations were reported through the Company's Whistleblower Hotline, grievance mechanisms, or other formal engagement and reporting processes. As a result, no remediation actions were required during the reporting period. This outcome is consistent with the findings of Torex's risk-based supply chain assessment, as well as its ongoing monitoring, supplier engagement, and oversight activities.

## MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO VULNERABLE FAMILIES

As indicated in the previous section, no instances of forced labour or child labour were identified by Torex in its activities or supply chains during the reporting period. As a result, no loss of income to vulnerable families was identified that required remediation in 2025.

## TRAINING AND AWARENESS ACTIVITIES FOR EMPLOYEES

Torex requires all employees to attest that they reviewed and understand the Company's Code of Business Conduct and Ethics, Whistleblower Policy and other related policies as part of our employee onboarding process. In addition, all staff employees must review and attest to these policies on an annual basis through our online learning management system called the Torex Academy.

In 2025, we also conducted Human Rights training for our site security personnel on the VPSHR, aimed at deepening our security team's understanding and application of these principles within our specific operational context. A total of 137 attendees from our private security team and our public security team (contracted through the auxiliary security service operated by the state) were trained. Additionally, two of our Security Team leaders completed the Diploma in "Legal Use of Force from a Human Rights Perspective" which is taught online through the CNDH Mexico, the National Human Rights Commission.

In 2025, there was no specific training provided to employees with respect to the risk of forced labour and child labour.

## ASSESSING EFFECTIVENESS IN PREVENTING FORCED LABOUR AND CHILD LABOUR IN ACTIVITIES AND SUPPLY CHAINS

We have assessed our effectiveness in preventing forced labour and child labour across our activities and supply chain through the operation of our existing governance framework, due diligence processes and management systems, including supplier onboarding and contractual controls, contractor management practices, and the review of grievance and whistleblower data. Given the complexity and multi-tiered nature of our global supply chain, we recognize the inherent challenges in fully assessing effectiveness in protecting human rights and remain committed to continuous improvement in this regard.

In 2025, the Company reviewed the outcomes of its risk-based supply chain assessment, Whistleblower reports, and community grievances. No concerns related to forced labour or child labour were identified through these channels during the reporting period.

Torex discloses our performance on certain human rights performance indicators through its annual Responsible Gold Mining Report, which provides transparency on performance over time. Through these combined mechanisms, Torex considers its current controls to be effective in mitigating forced labour and child labour risks within its operations and direct supply chain. The Company remains committed to continuous improvement and periodic reassessment of its supply chain risk management approach as part of its broader responsible mining framework. Our Responsible Gold Mining Reports, and other ESG-related disclosures, can be found in the [ESG Reporting Portal](#) on our website.

Going forward, our action plan to enhance effectiveness includes the ongoing review and strengthening of our supplier due diligence processes for goods and services provided to Torex and its subsidiaries.

## APPROVAL AND ATTESTATION

This Report was approved by the Board of Directors of Torex Gold Resources Inc. on May 6, 2026 on behalf of itself and the other Reporting Entities in accordance with subparagraph 11(4)(b)(i) 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 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.



Jody Kuzenko  
President, Chief Executive Officer and Director  
Torex Gold Resources Inc.  
May 6, 2026  
I have the authority to bind Torex Gold Resources Inc.