

Thor Explorations Ltd Modern Slavery and Human Trafficking Statement

1. Introduction and Overview

Thor Explorations Ltd (Thor) is committed to combating modern slavery and human trafficking in all its forms. This statement outlines the steps taken by Thor to ensure that slavery and human trafficking do not occur in its operations or supply chains, in compliance with the Modern Slavery Act 2015. The information in this Statement relates to Thor's operations for the year 2023, aligning with the company's financial reporting period.

Thor is a low-cost gold producer listed on both the TSX Venture Stock Exchange (TSX-V) and AIM Market of the London Stock Exchange (AIM). With a focus on West Africa, Thor operates the Segilola Gold Mine in Nigeria and has a portfolio of exploration projects, including the Douta Project in Senegal – www.thorexpl.com

2. Organizational Structure, Business, and Supply Chains

Organizational Structure

Thor's corporate governance is overseen by its Board of Directors, elected by shareholders and accountable to them.

The Board is responsible for:

- Conducting the company's affairs.
- Reviewing and approving operating plans and budgets.
- Identifying and mitigating principal business risks.
- Succession planning and assessment of senior management.
- Ensuring effective communication with shareholders and the public.
- Adhering to regulatory disclosure requirements.
- Stewardship of financial affairs through the Audit Committee.

The Executive Management, appointed by the Board, oversees day-to-day operations, with site management teams reporting on planning and operations.

Metrics and targets are established within comprehensive mine plans to achieve:

- Safe and environmentally responsible gold mining.
- Sustainable development and community prosperity.
- Operational excellence and superior shareholder return.

Business and Operations

Thor operates the Segilola Gold Mine in Nigeria, which produced 84,609 ounces of gold in 2023 – its second full year of operation. The mine employs 1,769 people (as of December 31, 2023), with 98% of the workforce being Nigerian and 81% subcontractor staff. The company also has the Douta Project in Senegal and other exploration assets across West Africa.

Supply Chains

Thor's supply chains are global, with a focus on generating local benefits. Key supply chains include:

Asia: Equipment and process plant parts, chemicals, and expertise.

European Union: Hazardous chemicals, vehicles, and specialist equipment.

Switzerland: Gold refining and purification.

West Africa: Non-hazardous materials, mining expertise, and exploration drilling.

Nigeria: Fuel, food, camp supplies, project staff, and professional services.

North America: Legal, financial, and mining expertise.

United Kingdom: Professional, financial, and public relations services.

Australia: Mining and geology expertise.

3. Policies Related to Slavery and Human Trafficking

Thor is committed to ethical and responsible business practices, including the prevention of modern slavery and human trafficking. This commitment is embedded in the following policies:

Procurement Policy: Thor sources goods and services ethically, minimizing adverse social or environmental impacts and ensuring that local communities benefit from its operations. The Supplier Code of Conduct requires suppliers and their subcontractors to adhere to ethical standards, including the prohibition of child labour and forced labour.

Human Rights Policy: Thor respects the rights of all individuals, particularly those in socially marginalized and vulnerable groups. The company insists that contractors adhere to national legislation and international labour standards, with a focus on preventing child labour, forced labour, and discrimination.

4. Due Diligence Processes

Thor has implemented robust due diligence processes to ensure compliance with its anti-slavery and human trafficking policies:

Supplier Assessment: Key suppliers undergo rigorous legal, financial, and ethical due diligence, including site visits and contract reviews.

Whistleblower Hotline: An independent hotline allows anonymous reporting of concerns related to slavery and human trafficking.

Grievance Handling: A formal process exists for addressing grievances from employees and external stakeholders.

In 2023, Thor enhanced its due diligence processes in Nigeria by implementing a Supplier Environment and Social survey. This survey, tailored to the scale of different suppliers, achieved a 70% return rate, with follow-ups conducted to ensure compliance with Thor's policies at the project level.

5. Risk Assessment and Management

Thor recognizes that certain parts of its operations and supply chains carry a higher risk of modern slavery and human trafficking, particularly in the use of local contractors near the Segilola mine. To mitigate these risks:

Workshops for Local Contractors: Thor has conducted workshops to educate local companies on the requirements for bidding on contracts, emphasizing the importance of ethical labour practices and compliance with company policies.

Contractual Requirements: Contracts issued for the Segilola project include clauses requiring compliance with Thor's policies and procedures, including the prohibition of forced labour and child labour.

Health & Safety Compliance: Subcontractors must comply with the Segilola Health & Safety system (SROLSafe), participate in toolbox meetings, and undergo HSE audits and site inspections.

6. Effectiveness of Measures

To ensure the effectiveness of its anti-slavery and human trafficking measures, Thor has implemented the following:

Employment Policies: Employment contracts include protections against unfair treatment and promote a fair and inclusive workplace.

Recruitment Processes: Thor's recruitment processes comply with relevant employment laws, including age verification to ensure no one under 18 is employed.

Security Measures: Access to the Segilola Mine Site is restricted, with no children allowed on site.

Fair Compensation: Employees pay, and rewards are market-related and reviewed annually.

Wellbeing Initiatives: Thor supports the physical and mental wellbeing of its employees through various initiatives.

Thor has not been fined or prosecuted for breaches of environmental, health and safety, labour, human rights, anti-bribery, or tax regulations in any of its operating locations.

Thor also complies with international mining industry initiatives such as the Extractive Sector Transparency Measures Act (ESTMA) and the Extractive Industries Transparency Initiative (EITI) in Nigeria.

7. Training and Capacity Building

Thor is committed to building capacity and ensuring knowledge transfer among its employees. In 2023, the company conducted 203 training programs primarily at the Segilola mine site. Training topics included:

Diversity, Equity, and Inclusion (DEI): Thor promotes a workplace free of barriers, bullying, and discrimination, in line with its Diversity Policy.

Safety and Health: Employees receive training on workplace safety, home safety, and health programs.

Business and Occupational Skills: Thor offers training in business development, monetary management, and practical occupational skills, particularly for women and youth in host communities.

8. Conclusion

Thor Explorations Ltd is committed to the ongoing prevention of modern slavery and human trafficking within its operations and supply chains. The company will continue to monitor, assess, and enhance its practices to ensure that its business activities align with its ethical standards and contribute to sustainable development in the communities where it operates.



Adrian Coates
Board Chairman Thor Explorations Ltd