

## **KUYA SILVER CORPORATION**

# Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

#### Fiscal Year 2024

## **INTRODUCTION**

This report (the "**Report**") relates to the fiscal year ended December 31, 2024 and outlines the actions taken by Kuya Silver Corporation ("**Kuya**" or the "**Company**") to prevent and reduce the risks of modern slavery, including forced labour and child labour, in its operations and supply chains in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").<sup>1</sup>

# STEPS TAKEN TO PREVENT AND REDUCE SUPPLY CHAIN RISKS

Kuya does not tolerate any form of modern slavery, forced labour or child labour in its operations or supply chain. The Company recognizes its responsibility to protect these values and to ensure that it is preventing and addressing risks that may arise within its operations and supply chain. The Company expects its business partners and suppliers to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

Kuya welcomes constructive engagement with all stakeholders, including suppliers, governmental authorities and clients, to increase the effectiveness of its modern slavery risk mitigation practices. The Company will continue to adapt to maintain the highest standards of ethics and integrity in its business and relationships.

In the Company's 2024 financial year, Kuya gained a better understanding of the requirements to investigate and address, as reasonable, risks associated with forced labour and child labour and how such risks may be present in its operations and supply chains.

# STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

# **Structure**

The Company was incorporated under the laws of the Province of British Columbia and was established as a legal entity on July 15, 2015. The common shares in the capital of the Company are listed for trading on the Canadian Securities Exchange under the symbol "KUYA", the OTCQB as "KUYAF" and the Frankfurt Stock Exchange as "6MR1".

The Company conducts its operations primarily through its head office located in Toronto, Ontario, Canada and its mining facilities in Peru and Canada.

<sup>&</sup>lt;sup>1</sup> The Company has prepared this Report based on information available to it at the time of preparation. This Report contains forward-looking statements relating to Kuya Silver Corporation's policies and practices with respect to forced labour and child labour risk management, including statements of current intention and expectation and statements of opinion. There can be no assurance that such statements will prove to be accurate, as the Company's actual results and future events could differ materially from those anticipated in this forward-looking information. Except as required by applicable laws or regulations, the Company does not undertake to publicly update or review any forward-looking statements.

## Activities

Kuya is a mineral exploration and development company, engaging in the acquisition, exploration, and advancement of precious metal assets in Canada and Peru. The company explores for silver, lead, zinc, copper, and gold. It primarily holds interest in the Bethania silver project with concessions totaling 4,295 hectares located in Central Peru; and the Silver Kings project covering approximately 13,000 hectares located in Northern Ontario, Canada.

Kuya's current core market is in Peru and includes the exploration, extraction and processing of silver-rich polymetallic mineralized material as well as the production and sale of silver-lead and zinc concentrates.

# **Supply Chains**

Kuya does business with a wide range of suppliers, sourcing materials and services locally and globally, and strives to build relationships with suppliers who align with the Company's values. Kuya strives to work with suppliers who operate legally, ethically and responsibly that are aligned with the Company's safety and operational integrity requirements.

The table below outlines the geographical location of the Company's primary suppliers and the percentage of annual purchases the Company made from the listed countries:

Country	Annual Purchases (%)	Type of Purchases
Peru	58%	mining supplies, services, equipment, transportation, food services
Canada	33%	drilling and exploratory site work, travel, consulting
USA	8%	geological support, consulting.

# **POLICIES AND DUE DILIGENCE**

There are several policies, processes, and practices that the Company uses to minimize the risk of forced labour or child labour practices in the Company's supply chains.

# **Policies**

The Company is committed to conducting its business and affairs with honesty, integrity and in accordance with high ethical and legal standards. Kuya's corporate governance framework is supported by several key corporate policies which are related to or affirm our zero-tolerance stance on modern slavery. These policies include:

- Code of Business Conduct and Ethics
- Whistleblower Policy

The Code of Business Conduct and Ethics provides a set of ethical standards by which each director, officer, employee, consultant and contractor of the Company is required to conduct his or her business with an expectation that all individuals, business acquaintances, business, and property be treated with respect. Everyone is expected to know, understand, and adhere to Company practices to protect the best interests of the Company and individuals within and outside. We expect respect for the rights and feelings of others and a demonstration of personal integrity and professionalism.

The Whistleblower Policy encourages the reporting, including confidential reporting, of questionable business practices, including suspected cases of Modern Slavery. Notably, the Whistleblower Policy encourages reporting of any violation of any applicable law, rule or regulation that relates to violation of any corporate policies, including health, safety, environmental, operational or ethical. Any allegations of these wrongdoings will be further investigated under the Whistleblower Policy.

Kuya also intends on adding to and revising its internal policies to more specifically address the risk of forced labour and child labour. This is expected to include:

- Implementation of a supplier code of conduct, human rights and labour policy ("Supplier Code")
- An annual review of the supplier's policies and procedures as they relate to risks of forced labour and/or child labour

To support meaningful adoption of the Supplier Code in regions where Kuya operates, the Supplier Code is being translated into Spanish. This ensures suppliers in Peru can fully understand the expectations and legal implications regarding forced and child labour.

## Due Diligence

Internally, the Company has reviewed its hiring and manufacturing practices and determined there is no internal risk of forced labour or child labour. Externally, the Company has identified overseas suppliers as having a heightened risk of the potential for the use of forced labour and child labour.

Kuya has established a Technical, Safety, Environment, and Social Responsibility Committee. This Committee is mandated to ensure that the Company operates in a manner that respects sustainable development principles, upholds human rights, and manages social impacts responsibly, including labour practices across the supply chain.

Kuya maintains a master list of suppliers used in its procurement process and manufacturing activities. Kuya will cross-reference its list of suppliers with the List of Goods Produced by Child Labor or Forced Labor released by the U.S. Department of Labor to identify which countries, products and therefore suppliers may exhibit an elevated risk of forced labour or child labour.

Currently, Kuya does not evaluate all policies and procedures of each of its suppliers. The Company is in the process of implementing a supplier onboarding process, as well as an annual review of existing suppliers, within the a phased twelve to eighteen month rollout, subject to supplier cooperation and available resources. Kuya intends to include a standardized review of each supplier's policies and procedures as it relates to performance and risk, including forced labour and/or child labour. Such processes will be completed before determining if the Company is willing to work with a particular supplier.

While Kuya expects suppliers to certify compliance with its Supplier Code, including prohibitions on forced and child labour, participation is currently voluntary. Kuya recognizes that legal and practical limitations may prevent full participation from certain suppliers, particularly in regions where corporate governance standards may differ

#### **SUPPLY CHAIN RISKS**

Due to the nature and location of its operations, Kuya considers the risks of forced labour or child labour practices in its supply chains to be low to medium and is committed to reducing these risks further through supplier engagement, internal review processes, and enhanced onboarding protocols. Similarly, the Company's risk of involvement in modern slavery practices by its suppliers is considered low to medium. Nonetheless, Kuya remains committed to taking steps to identify and address potential incidents of forced labour or child labour in its supply chains.

The majority of the Company's suppliers are in countries with adequate standards of protection for employees and the rights of individuals and do not pose a high degree of risk of forced labour or child labour practices. Kuya's primary suppliers are in Peru.

#### REMEDIATION MEASURES

Kuya is evaluating industry best practices and internal processes and will diligently take all appropriate remediation measures, as required. To date, there have been no identified or reported instances of forced labour or child labour in Kuya's activities and supply chain, therefore, Kuya has not had to take any remediation measures.

## **LOSS OF INCOME**

Kuya recognizes that efforts to prevent and reduce the risks of forced labour and child labour can have the unintended consequence of contributing to a loss of income for the most vulnerable families. Kuya is not aware of any instance to date where its efforts to mitigate the risk of forced labour or child labour in its activities and supply chains may have contributed to a loss of income for vulnerable families.

## **TRAINING**

When onboarding new employees, Kuya provides training regarding its safety commitments and Code of Conduct. Kuya is also committed to improving the capacity of its employees to understand, identify and manage the risks of modern slavery in our operations and across its supply chain.

## **EFFECTIVENESS ASSESSMENT**

The due diligence processes described above provide a method of managing the risks; however, the Company will continue to look at ways to enhance its capability to identify any risks indicators within its supply chain and its capability to investigate and address any concerns.

Kuya will continue to review its approach and continuously improve its processes to respond to the risks of forced labour or child labour in its supply chain. The Company has not received any complaints of any modern slavery issues or notifications from its suppliers of identification of modern slavery practices.

While Kuya is committed to ongoing review and risk mitigation with respect to forced and child labour, it acknowledges that complete visibility across all tiers of the supply chain may not always be feasible. The Company will address any material risks or incidents if and when they are identified and will take corrective measures in line with regulatory expectations and ethical standards.

## **APPROVAL AND ATTESTATION**

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors on May 22, 2025.

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.

By: "/s/ David Stein"

David Stein CEO

May 22, 2025

I have the authority to bind the Company.