



**REPORT RE FIGHTING AGAINST FORCED LABOUR AND  
CHILD LABOUR IN SUPPLY CHAINS ACT**

**Entity Information**

**Entity Name: Gunnison Copper Corp.**

**Entity Address: 2999 North 44<sup>th</sup> Street, Suite 300, Phoenix, AZ, 85018**

**Subsidiary Entities Covered by Report: Excelsior Mining Arizona, Inc., Excelsior Mining Holdings Inc.**

**Section 11 Information**

*(1) Describe the steps the entity has taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.*

**Gunnison Copper Corp. and its subsidiaries (collectively the “Company”) recognize that by the nature of its business, there is a risk that its operations could cause, contribute to, or be directly linked to, modern slavery. Potential modern slavery risk exposures in our operations have been assessed as follows:**

- **Employees/labour – a risk of “causing” or “contributing to” modern slavery if any of our employees or temporary workers were in exploitative situations.**
- **Community – a risk of “contributing” or being “directly linked” to modern slavery if our activity contributes to modern slavery in the community.**
- **Investments – a risk of being “directly linked” to modern slavery through our investments if our investees are themselves involved in modern slavery.**

**As it relates to its labor force, the Company only has employees in the State of Arizona, USA and British Columbia, Canada. The Company pays all of its employees at or above the prevailing minimum wage in the State of Arizona, USA and British Columbia, Canada, and all employees are verified to be employed voluntarily and therefore does not engage in any forced labour practices.**

**During the most recently completed financial year, the Company took steps to mitigate the risk of modern slavery in its supply chain. The key activities undertaken included providing suppliers and contractors with guidance on business integrity principles (which included modern slavery elements) and clarifying our expectations of our suppliers in including business integrity contract clauses.**

**There have not been any modern slavery issues identified during the most recently completed financial year.**

*(3)(a) Entity structure, activities and supply chains*

The Company's only production of goods is the production of copper cathode extracted from its mine in Arizona, USA. To support its copper production the Company sources many items including but not limited to acid, reagents, solutions, gas, propane, spare parts, piping, flanges, pumps, fasteners, motors, safety equipment and computer equipment. All goods are sourced from suppliers in the United States, except for Acid which during 2024 was partially sourced from Mexico.

*(3)(b) Entity policies and its due diligence processes in relation to forced labour and child labour*

Within its mining operation the Company conducts due diligence on employees to ensure they are of legal age and would not be engaging in child labor. The United States government provides an online system to complete age and identity verification that the Company relies on in hiring its workforce. The Company pays all of its employees at or above the prevailing minimum wage in the State of Arizona and all employees are verified to be employed voluntarily and therefore does not engage in any forced labour practices.

The Company has begun to implement due diligence procedures with suppliers to ensure that its suppliers have adequate policies and procedures to reduce the risks of forced labour and child labour.

*(3)(c) The parts of Entity's business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk*

With respect to the Company's mining operations it has assessed the risk of child labour and forced labour as low due to its due diligence activities in verifying age status, paying a wage that is at or above the prevailing minimum wage in the State of Arizona and confirming employees are employed voluntarily.

With respect to its supply chain, the Company has determined that there is a low risk of forced labour or child labour in its supply chain due to almost all of the Entity's suppliers being located in the United States. In order to manage the risk the Company has begun to require supplier certifications and contractual provisions regarding forced labour and child labour risk reduction practices and procedures.

*(3)(d) Any measures taken to remediate any forced labour or child labour*

The Company believes our activities and supply chains do not carry a risk of forced labour or child labour being used and as such has not taken any measures to remediate any forced labour or child labour.

*(3)(e) 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 forced labour or child labour in its activities and supply chains*

The Company has not taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains because the Company believes our activities and supply chains do not carry a risk of forced labour or child labour being used.

*(3)(f) The training provided to employees on forced labour and child labour*

Employees are trained in hiring practices to ensure that all employees are of legal age to work in the State of Arizona, provided relevant information on applicable minimum wages and directed to ensure that all employees are voluntarily employed. The Company has not yet implemented training on

**identifying forced labour or child labour risks in its supply chain but is in the process of establishing policies and training employees on such policies.**

*(3)(g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains*

**The Company does secondary verification of the age status of its employees through the United States E-Verify system in order to assess its compliance with child labour restrictions at its mine site. The Company does not have a process in place to ensure the effectiveness of ensuring that forced labour and child labour are not being used in its supply chains.**

**Attestation**

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.

Full name: Stephen Twyerould

Title: President, CEO and Director

Date: May 29, 2025

Signature: "Stephen Twyerould" (I have the authority to bind **Gunnison Copper Corp.**)