

## Modern Slavery Act Report May 2025

Athabasca Basin Development Limited Partnership is a Saskatchewan Indigenous-owned investment company. Investments include partial or complete ownership in construction, underground mining, industrial security, electrical, diamond drilling, logistics, cannabis, retail, road maintenance, aviation and more.

The company is owned by the seven communities in the Athabasca region, providing an efficient way to partner with local communities in one of the world's premier mining and exploration districts. For more information on our company and its investments, please visit our website at [www.athabascabasin.ca](http://www.athabascabasin.ca).

Of our ownership, the following investments are subject to significant influence and distribute goods in Canada:

- Arctic Beverages – 48.33% ownership
- Optek Solutions – 37.5% ownership
- Points North Freight Forwarding – 48.37% ownership
- Synergy Five Investments – 37.5% ownership

The following investments are interest in jointly controlled enterprises and manufacture and distribute goods in Canada:

- Tru North RV, Auto & Marine Sales – 50% ownership.

### Anti Slavery Policy Statement

Athabasca Basin Development values being a good corporate citizen. We, together with all of our investments, are committed to social and environmental responsibility. We are committed to employment equity, diversity and inclusion and foster a respectful workplace environment, including ensuring the health and safety of their workers, subcontractors and the public. This includes zero tolerance of any form of modern slavery and human trafficking in our company and our investments.

This report sets out the steps that Athabasca Basin Development has taken during 2024 to ensure that slavery, human trafficking and child labour are not taking place in any of its supply chains or in any part of its own operations.



## Risk Assessment and Due Diligence Process

As an investment company, our own business operations and supply chains primarily include professional services, and we have assessed the risk of modern slavery within our business and supply chain to be low.

We have been in discussions with all the companies we own and most of our companies are service companies that also use local professional suppliers, where we would assess the risk of modern slavery and child labour to be low. Of our companies that manufacture or distribute, the companies that do not import goods directly ensure that they procure material from professional, well-known suppliers where policies against modern slavery are in place. The companies that do import products directly have supplier agreements in place with suppliers whereby the suppliers agree to comply with a code of conduct that includes compliance with law and protection of Human Rights.

Overall, we have not identified any forced labour or child labour in our activities and supply chains, and we have embedded responsible business conduct into our policies, management, and governance systems to ensure that we uphold our value of being a good corporate citizen.

## Future Steps

We understand that modern slavery can take many forms and it is important that our employees and investments understand the issues surrounding modern slavery, child labour and human trafficking. We are in the process of developing a plan to implement awareness training to reinforce our zero-tolerance policy and our due diligence process.

As we move forward, we will also be developing governance processes to further implement, monitor and assess the effectiveness of our policies and procedures in preventing and reducing the risks of forced labour and child labour.

## Approval and 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 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.

A handwritten signature in black ink, appearing to read "Geoff Gay", is written over a light blue horizontal line.

Geoff Gay  
CEO

May 29, 2025

I have the authority to bind Athabasca Basin Development Limited Partnership by its General Partner, Athabasca Basin Development Corporation.

