



## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR REPORT FOR THE YEAR ENDED DECEMBER 31, 2023

### **Introduction**

Corsa Coal Corp. and each of our subsidiaries (“Corsa” or the “Company”) is committed to preventing the occurrence of forced labour and child labour in our operations and supply chains. We do not tolerate child labour, forced labour or any other form of slavery and we expect that our suppliers share our commitment to ethical and responsible business practices and support our values.

This report (the “Report”) has been prepared pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and outlines the actions we have taken during the year ended December 31, 2023 to prevent and reduce the risk of forced labour or child labour occurring in our business.

The use of the words “we”, “us” and “our” refers to Corsa.

This Report has not been prepared as financial or investment advice or to provide any guidance in relation to our future performance. Readers should review the disclaimers beginning on page 4 of the Report.

### **Our Structure and Business**

Corsa is in the business of mining, processing and selling metallurgical coal, as well as exploring, acquiring and developing resource properties that are consistent with its existing coal business. The Company is a corporation existing under the Canada Business Corporations Act and is domiciled in Canada. The registered office of Corsa is located at 199 Bay Street, Suite 5300, Commerce Court West, Toronto, Ontario, Canada, M5L 1B9, and the head/corporate office of Corsa is located at 1576 Stoystown Road, P.O. Box 260, Friedens, Pennsylvania, USA, 15541. Corsa’s common shares (“Common Shares”) are listed on the TSX Venture Exchange (“TSX-V”) under the symbol “CSO” and the Common Shares also trade on the OTCQX Best Market under the symbol “CRSXF”.

The Company’s coal operations are conducted through its Northern Appalachia Division (“NAPP” or NAPP Division) based in Somerset, Pennsylvania, U.S.A. and are primarily focused on metallurgical coal production in the states of Pennsylvania and Maryland. Corsa markets and sells its metallurgical coal production to customers in North America, South America, Asia and Europe. Corsa produces coal from five mines, one preparation plant and has approximately 400 employees.

The legal ownership structure for the Company's subsidiaries is presented below.

Legal Entity Name	Jurisdiction of Incorporation or Formation	Legal Parent	Operating Division	Corsa Indirect Ownership
Corsa Coal Corp.	Canada	Publicly Traded	Corporate	N/A
Wilson Creek Holdings, Inc. ("WCH")	Delaware, USA	Corsa - 100%	Corporate	N/A
Wilson Creek Energy, LLC ("WCE")	Delaware, USA	WCH - 100%	NAPP	100%
Maryland Energy Resources, LLC	Delaware, USA	WCE - 100%	NAPP	100%
Mincorp Acquisition Corp. ("MAC")	Delaware, USA	WCH - 100%	NAPP	100%
Mincorp, Inc.	Delaware, USA	MAC - 100%	NAPP	100%
PBS Coals, Inc. ("PBS")	Delaware, USA	Mincorp, Inc. - 100%	NAPP	100%
RoxCoal, Inc.	Pennsylvania, USA	Mincorp, Inc. - 100%	NAPP	100%
Quecreek Mining, Inc.	Pennsylvania, USA	PBS - 100%	NAPP	100%
Croner, Inc.	Pennsylvania, USA	PBS - 100%	NAPP	100%
Elk Lick Energy, Inc.	Pennsylvania, USA	PBS - 100%	NAPP	100%

## Our Supply Chains

Corsa relies on a diverse pool of suppliers to provide goods and services to support our mining, transportation and processing of coal and related support services (including but not limited to truck transportation, fuel, contract mining services, roof control products, purchased coal, machinery and equipment). Corsa's procurement operations are conducted through a dedicated procurement function that is led by the Company's Chief Financial Officer. The majority, approximately 99%, of the procurement spend was with suppliers in the United States of America and approximately 1% was with administrative service providers in Canada.

## Our Policies and Due Diligence Processes

Corsa's policies establish our dedication to conducting business in a lawful, ethical and responsible manner and our commitment to prevent forced labour and child labour in our activities. Our policies outline the Company's standards for acceptable business conduct and are reviewed and updated as needed by our executive team and the Board of Directors. Corsa intends to develop specific forced labour and child labour policies over the course of the next year. Corsa's policies are accessible to employees, officers and directors and are available on internal communication channels and members of the management team and certain directly impacted employees are required to certify annually that they have read, are aware and follow the Company's policies and procedures.

Corsa requires its employees, officers, directors and consultants to adhere to the Company's Code of Business Conduct and Ethics and are reminded of the principles annually. The Code of Business Conduct and Ethics requires, among other commitments, our employees, directors, officers and consultants conduct the Company's business affairs honestly and with integrity using high ethical standards, to comply with the laws, rules and regulations of each jurisdiction in which the Company does business and to comply with all applicable local employment and human rights laws in any jurisdiction where we do business.

Additionally, the Company has an Anti-Bribery and Anti-Corruption Policy, a Compliance Procedure Manual and Third Party Due Diligence Policy, a General Authority Limitations Policy and a Travel and Expense Policy. These commitments help our employees, directors and officers reduce the risk of forced or child labour in our operations and supply chains.

### Whistleblower Policy

Corsa advocates for a zero-tolerance policy towards retaliation against whistleblowers and provides for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls, auditing matters or violations of the Company's Code of Business Conduct and Ethics Policy, Anti-Bribery and

Anti-Corruption Policy and another other policy, charter or mandate of the Company, or applicable laws, rules and regulations. The Whistleblower Policy provides a procedure to follow to file a complaint either through the dedicated compliance officer or anonymously through a third party, Safe Hotline, Inc, to receive and record, on a confidential basis, any concerns regarding these matters.

#### The Procurement Process

The Company's General Authority Limitations policy governs the engagement of consultants, professionals, independent contractors and requires a purchase order to be issued and processed before ordering or procuring any equipment, materials, supplies, subcontractors, etc. related to all Company work. The purchase order includes standard terms and conditions. Additionally, the Compliance Procedure Manual Third Party Due Diligence Policy requires a "Know your Customer" questionnaire to be completed for suppliers or vendors outside of the United States of America or Canada and additional due diligence procedures to follow before any goods or services are procured from these vendors.

#### **Potential Supply Chain Risks of Forced Labour or Child Labour**

Corsa recognizes the risk of forced labour and child labour is greater within our supply chains compared to our own operational activities. Furthermore, certain individuals, sectors and geographic locations that may be within our supply chains may be at higher risk of forced labour and child labour.

As such, the Company has identified, through conducting a risk assessment, the following categories of goods as being the most notable potential risks of forced labour and child labour within our supply chains:

- mining equipment and associated inputs which may be procured from a variety of jurisdictions and suppliers;
- other goods manufactured in regions considered at higher-risk of forced labour or child labour; and
- clothing and personal protective equipment.

The measures Corsa takes to mitigate the risk of forced labour and child labour in our operations include our policies and procedures outlined above, in addition to other risk management strategies.

#### **Measures Taken to Remediate any Forced Labour or Child Labour and Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Result from any Measure taken to Eliminate the Use of Forced or Child Labour in our Activities or Supply Chains**

In 2023, Corsa did not implement any remedial measures as no instances of forced labour or child labour were identified in our operations or supply chains.

In the event of forced labour or child labour occurring despite our preventative efforts, we will address the situation in accordance with our commitments, policies and standards.

#### **Employee Training**

Corsa is committed to ensuring that its employees, directors and officers have access to training pertaining to our Code of Business Conduct and Ethics Policy. During the year ended December 31, 2023, Corsa did not provide specific training with respect to identification of forced labour or child labour in its operations or supply chains. Corsa is in the process of developing forced labour and child labour training modules for our employees and expects to have those trainings completed by the end of 2024.

#### **Measuring our Effectiveness**

During the year ended December 31, 2023, no actions were taken to assess the effectiveness of preventing and reducing risks of forced labour and child labour in our activities and supply chains. Corsa is dedicated to ensuring that neither forced labour or child labour is present within our operations or our supply chains. To assess the effectiveness of preventing and reducing risks of forced labour and child labour in our activities and supply chains, Corsa is committed to:

- reviewing periodically our supplier base to identify potential risks of forced labour and child labour;
- identifying and mitigate risks of forced labour and child labour wherever they arise; and
- annually reviewing our policies related to child labour and forced labour prevention.

## **Disclaimers**

This Report does not constitute or form part of any offer or invitation to sell or issue, or any solicitation of any offer to purchase or subscribe for any securities.

All references in this Report to dollars or “\$” are to United States dollars.

## **Forward-Looking Information**

Certain information in this Report may constitute forward-looking information within the meaning of applicable securities legislation. Forward-looking information may also include information regarding our respective future plans or objectives or other information that is not comprised of historical fact and includes statements that contain words such as “could”, “should”, “anticipate”, “expect”, “believe”, “plan”, “propose”, “estimate”, “intend”, “project”, “will”, “may”, “forecast”, “outlook” and similar expressions suggesting future outcomes or events.

Any such forward-looking information is based on information currently available to us and is based on assumptions we believe are appropriate in the circumstances.

However, such forward-looking information involves significant risks and uncertainties. A number of factors could cause actual results to differ materially from those discussed in the forward-looking information. These risks and others are more fully discussed in our most recent annual information from which is available on our SEDAR+ profile at [www.sedarplus.com](http://www.sedarplus.com). We caution readers not to place undue reliance on any such forward-looking information. Such information is current only as of the date on which it was made. Unless otherwise required by applicable securities laws, we do not intend, nor do we undertake any obligation, to update or revise any forward-looking information contained in this Report.

## **Attestation and Approval**

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Corsa Coal Corp.

In my capacity as a Director, President and Chief Executive Officer of Corsa Coal Corp., and not in my personal capacity, I make this attestation in accordance with the requirements 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 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.



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Kevin M. Harrigan  
Director, President and Chief Executive Officer



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Ronald G. Stovash  
Director and Chairman of the Compensation,  
Nominating and Governance Committee

May 17, 2024