



## NORTH AMERICAN HELIUM INC.

### Fighting Modern Slavery

Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*  
for the Calendar Year ending December 31, 2023

#### Introduction

This Report is prepared pursuant to and in compliance with the *Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canada)* (also known as the “**Modern Slavery Act**” or the “**Act**”), effective as of January 1, 2024.

This Report is filed on behalf of North American Helium Inc., a company formed under the laws of British Columbia, for itself and its wholly owned Canadian subsidiary, 1302415 B.C. Ltd. a company formed in British Columbia (collectively, “**NAH**” or the “**Company**”, “**we**” or “**us**”). The Company is headquartered in Calgary, Alberta and operates primarily in Saskatchewan, Canada.

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a Canadian helium exploration and production company, we recognize the important role that we have in ensuring that our operations, and the supply chains that support our operations, adhere to the highest ethical standards. This includes the prevention and identification of forced labour and child labour in our supply chain.

This Report sets out the steps we have taken to prevent and reduce the risk that forced labour or child labour is used at any step in the production of helium in Canada by NAH, or of goods imported into Canada by NAH.

#### Our Business – Structure, Activities and Supply Chain

North American Helium’s head office is located at 1200-440 2 Avenue SW, Calgary, Alberta T2P 5E9. Our registered and records office is located at 505-1168 Hamilton Street, Vancouver, BC V6B 2S2. The Company has approximately 50 employees in Canada.

The Company currently has seven helium producing facilities on its contiguous land position of over nine million acres in southwest Saskatchewan, Canada, including Canada’s largest facility (Battle Creek), selling gaseous and liquid helium on long-term contracts to some of the largest global industrial gas companies. NAH has discovered eleven new helium fields in Saskatchewan to-date, and also has exploration assets in Alberta, Utah, Arizona, and Montana. The Company is working to rapidly grow its production to meet increasing helium demand from semiconductor manufacturing, space exploration, and emerging applications like small modular reactors (SMR) and nuclear fusion. NAH currently produces over 5% of helium supply in North America.

The Company’s supply chain includes businesses that supply goods and services to our organization, primarily encompassing various vendors, suppliers, contractors, and subcontractors involved in the

procurement of goods and services necessary for our operations in developing and maintaining helium properties and producing helium. .

The suppliers we engage include businesses that are predominantly local and adhere to regulations in Canada for industrial gas production. Our purchasing organization is comprised of our Marketing & Logistics and sourcing and purchasing teams. The sourcing and purchasing group is responsible for supplier selection, contract negotiations and supplier performance monitoring, with support from our Operations and Engineering team. These two groups work together as a cohesive team to ensure successful, streamlined sourcing and purchasing operations. Our relationships with our suppliers are crucial to the long-term success of our organization. During the initial supplier selection phase and on an ongoing basis, we consider suppliers' records when evaluating supplier relationships, to the extent such information is available to us. We require as a condition of contract that all suppliers agree to comply with all applicable laws and regulations, including compliance with Canada's Modern Slavery Act.

Additional information regarding the corporate structure, operations and the industry conditions relating to our Company is on our website at [www.nahelium.com](http://www.nahelium.com). For further details on our commitment to the Environment, Governance, and Sustainability see <https://nahelium.com/sustainability>.

#### Our Policies and Due Diligence Processes

NAH has several policies in place which are relevant to prevent and reduce the risk of forced labour or child labour in its business and supply chains. These policies are set out below. In addition, the Company will continue to evaluate additional actions it may implement to help prevent and reduce the occurrence of forced and/or child labour in its business and supply chains. Lastly, the Company has established an internal working group composed of management representatives with knowledge of our supply chain and with expertise on sustainability, governance, and legal requirements.

#### *Code of Ethics and Business Conduct*

We are committed to conducting our business in an honest and ethical manner with full, fair, accurate, timely and understandable disclosure in the Company's reports and communications and compliance with applicable governmental laws, rules, and regulations. These principles are included in our Code of Ethics and Business Conduct. This Code is the foundation of our company policies. The Code applies to all team members, including directors, officers, employees, agents, consultants, and contractors.

#### *Whistleblower Policy*

Our Whistleblower Policy provides a mechanism for all team members to report concerns in good faith regarding wrongdoing without fear of victimization, subsequent discrimination, retribution, or disadvantage. The Whistleblower Policy is intended to encourage and enable team members to raise concerns within our Company rather than overlooking a problem. The Whistleblower Policy would allow anyone with concerns regarding forced and/or child labor to report it. Just like the Code, the Whistleblower Policy applies to all team members working for NAH.

#### *Anti-Corruption, Anti-Bribery and Anti-Modern Slavery Policy and Responsible Resource Development Policy*

These two policies set out our expectations regarding, respectively, interacting with government officials, business partners, third parties and community stakeholders with integrity and in compliance with applicable anti-bribery and anti-corruption laws, and operating in a safe and sustainable manner, using innovation, and respecting our environment. Together these policies function to reinforce the principles set out in the Code and the Whistleblower Policy. Additionally, the Company has specifically addressed modern slavery in the Anti-Corruption, Anti-Bribery and Anti-Modern Slavery Policy.

We may terminate our relationship with any individual or organization that does not comply with the above policies.

#### *Due Diligence*

While we believe that the potential risk of forced labour or child labour in our industry supply chain is low, we acknowledge that such risk exists. We also recognize that our exposure to the risk of forced labour and/or child labour may increase when we engage with third parties, particularly in categories such as personal protective equipment and clothing and construction materials sourced in whole or in part offshore and/or through third parties.

It is our expectation that third parties with which we have a business relationship adhere to principles and values similar to our own and comply with all applicable laws and regulations. In determining that the potential risk of forced labour or child labour in our industry supply chain is low, we considered the following indicators:

- (i) lack of reliance on low skilled workforce (our industry relies on a skilled / specialized workforce);
- (ii) lack of presence of migrant workers and lack of presence of labour intermediaries,
- (iii) lack of presence of child labour;
- (iv) minimal offshore production and sourcing of materials;
- (v) the work in our industry is not perceived as dangerous or undesirable;
- (vi) lack of long, complex, or non-transparent supply chains, and;
- (vii) lack of jurisdictional risks including poverty, conflict, and lack of enforcement of international human rights standards.

#### Our Commitment to Prevention of Forced or Child Labor Risks in Our Business – Assessing and Managing Risk

We engage in various activities to identify, assess, and manage risk for forced and child labour in our supply chains. We engage in the following activities and consider the following factors:

- (i) conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
- (ii) developing and implementing an action plan for addressing forced labour and/or child labour;
- (iii) gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- (iv) addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour;
- (v) developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains;
- (vi) developing and implementing anti-forced labour and/or child labour contractual clauses;
- (vii) developing and implementing anti-forced labour and/or child labour standards and codes of conduct, and;
- (viii) developing and implementing grievance mechanisms.

#### Remediation Measures

NAH has assessed its activities and supply chains and as of the date of this Report, has not identified any incident of forced labor or child labor being used. Therefore, the Company did not take any measures to

remediate an incident of forced labour or child labour. As noted above, it has been determined that the activities and supply chain of the Company carry a low risk of forced labor or child labor being used. If a situation of non-compliance is identified, the Company will work to develop and implement a corrective plan to improve and remedy the situation. As a result, as of the date of this Report the Company has not undertaken any measures to remediate the loss of income or specific activities for vulnerable families to remediate slavery and human trafficking in its supply chain.

### Training

All team members at all levels are required to adhere to our Code of Business Ethics and Conduct and our other policies, including our Anti-Corruption, Anti-Bribery and Anti-Modern Slavery Policy. When joining the Company, and annually thereafter, all team members must sign a declaration confirming that they have read and understood such policies and comply with same.

We are developing training to ensure compliance with Company standards regarding this Report, and in the future we intend to continue to develop and maintain training modules that support our commitment to human rights, including adherence to labor laws, adherence to ethical business practices, proper and fulsome disclosure of information, and supply chain diligence, management and verification processes. In 2024, the Company intends to implement mandatory training on this topic to all of our employees in Canada.

### Assessing Effectiveness

The Company monitors compliance with its policies and procedures on an ongoing basis and through its internal governance processes. Management also reviews any concerns raised through our Whistleblower Policy and other informal mechanisms such as employee feedback. To date no significant concerns or complaints have been identified.

We intend to continue to review, reassess, and further develop our anti-forced and child labour policies and measures, not only to ensure compliance with applicable laws but also to ensure that we fulfil our core values as expressed in the Code, and in this Report.

### Conclusion

Collectively, this Report and the policies, processes, and procedures described in this Report, are all designed to ensure that the Company is proactive and committed to maintaining a workplace and supply chain free of forced labour and child labour. As a leader in the industry, NAH understands the importance of being a responsible corporate citizen, and that ethical choices are critical in creating a sustainable business.

### Approval

This Report was approved by the Company's Board of Directors on May 29, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our website at [www.nahelium.com](http://www.nahelium.com).

## 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 this Report for the Company. 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.

NORTH AMERICAN HELIUM INC.



Nicholas C. Snyder, CEO and Chairman  
*I have the authority to bind the Company.*

Date: May 29, 2024

## *Forward-Looking Information*

*Certain statements contained in this Report include statements which contain words such as “anticipate”, “could”, “should”, “expect”, “seek”, “may”, “intend”, “likely”, “will”, “believe” and similar expressions, statements relating to matters that are not historical facts, and such statements of our beliefs, intentions and expectations about development, results and events which will or may occur in the future, constitute “forward-looking information” within the meaning of applicable Canadian securities legislation and are based on certain assumptions and analysis made by us derived from our experience and perceptions. Forward-looking information in this report includes, but is not limited to: the steps taken to prevent and reduce risks of forced and child labour; the implementation of policies in relation to forced labour and child labour; training provided to employees in respect of forced labour and child labour; business strategy and outlook; remediation measures in respect of forced labour or child labour; maintenance of existing supplier and partner relationships; supply channels; and other such matters.*

*All such forward-looking information is based on certain assumptions and analyses made by us in light of our experience and perception of historical trends, current conditions and expected future developments, as well as other factors we believe are appropriate in the circumstances. The risks, uncertainties, and assumptions are difficult to predict and may affect operations, and may include, without limitation: equipment and labour shortages and inflationary costs; general economic conditions; industry conditions; changes in applicable environmental, taxation and other laws and regulations as well as how such laws and regulations are interpreted and enforced; foreign exchange fluctuations; the existence of operating risks; volatility of helium prices; helium product supply and demand; risks inherent in the ability to generate sufficient cash flow from operations to meet current and future obligations; increased competition; access to information regarding subcontractors; opportunities available to or pursued by us; and other factors, many of which are beyond our control. The foregoing factors are not exhaustive.*

*Actual results, performance or achievements could differ materially from those expressed in, or implied by, this forward-looking information and, accordingly, no assurance can be given that any of the events anticipated by the forward-looking information will transpire or occur, or if any of them do, what benefits, if any, will be derived from them. Except as required by law, we disclaim any intention or obligation to update or revise any forward-looking information, whether as a result of new information, future events or otherwise. All forward-looking information contained in this Report is expressly qualified by this cautionary statement.*