TSM Summary Assessment Report

Facility Information

Name of company	Rio Tinto Ltd.
Name of facility	Iron Ore Company of Canada
Address	Colby Building North – Office # 2039 121 Matthew Drive Labrador City, NL A2V 2A2
Country of operation	Newfoundland and Labrador, and Québec, Canada
Products/metals produced on site	Iron ore concentrate and pellets
Types of operations included in scope:	
Mining	☒
Milling	☒
Smelting	☐
Hydrometallurgical	☐
Refining	☐
Other (please explain)	Production of iron ore pellets
Types of infrastructure included in scope:	
Roads	☐
Rails	☒ QNS&L railway
Ports	☒ Sept-Îles, QC marine terminal
Other (please explain)	☐

Verifier and Verification Information

Verification firm	EEM EHS Management Inc.
All verifiers involved in the verification are accredited TSM verifiers	Yes, the verifiers involved (2) were recognized TSM Verification Service Providers.
Date(s) of verification activities	17/10/2023 – 30/11/2023
Verification period	2023
Methodology summary	The verification was carried out in accordance with the principles set out in the following standards and documents: • *ISO 19011:2018 – Guidelines for auditing management systems*; and, • Mining Association of Canada Audit Service Provider Mandate (revised November 19, 2021). The tasks and activities undertaken during the verification process are summarized below: • Prior to the verification, the facility self-assessments and supporting documentation were made available to the verifiers; • Evidence was collected through interviews, and submitted documents and records; • The information collected was evaluated based on the criteria set out in the performance standard protocols evaluated; and, • A closing meeting was held. This verification report, which contains the audit conclusion and the audit statement, has been produced.
Summary of the verification activities	• A kick-off meeting was held to prepare the verification; • The client submitted documentation for review by the verifier; • An opening meeting was held on the morning of October 17th, 2023; • Collection of evidence was conducted by videoconference interviews and through documents and records submitted by email or stored on an MS Teams portal; • Working notes were taken by the verifier; • An attempt was made to contact a representative number of external communities of interest (CIs) listed by IOC, according to the Squeglia c=0 method for an acceptable quality level of 90%. Of the five (5) CIs selected, only two (2) were reached. No issues were identified with regards to IOC's stakeholder management processes for the CIs interviewed. • A closing meeting was held during the afternoon of October 26th, 2023.

	• Subsequent interviews and document reviews were conducted; and,
	• The present report was produced.
Was a site visit conducted?	No. A previous site visit was conducted at the facilities by one of the verifiers in June 2023 during an EHS compliance audit mandate.

Summary of Findings

Note : Ratings that have been changed by the verification service provider are highlighted in **bold**. The justification for rating changes is provided in *italicized text* in the Comments column of the corresponding changed rating.

Criterion	Rating	Comments / Examples of Evidence Consulted
Indigenous and Community Relationships (version CAN 3.0, February 2021)		
1. Community of Interest (COI) Identification	AAA	1. Periodic reviews of the COI identification system are done in collaboration with COI to allow for continual improvement. 2. COI input is considered in updates to the COI identification process. • a. Where COI input is not incorporated, feedback is provided to the COI on why input was not incorporated. Evidence reviewed: • Facility stakeholder mapping • Socioeconomic knowledgebase • IOC multi-year Community social performance plan • 2022 Rio Tinto CSP standards • Netbenefit Solutions platform • CAP meeting documents • Stakeholder engagement tracking system (in MS Teams)
2. Effective COI Engagement and Dialogue	**AA**	1. Engagement processes are co-developed with COI, where possible, and include mechanisms for resolving disputes. 2. COI are engaged in joint decision making on agreed-to matters that directly affect them and/or in which they have an interest. 3. A review of the effectiveness of the engagement system has been conducted with COI and identified corrective actions are being implemented. *Scoring downgraded from AAA to AA due the absence of public reporting that includes the disclosure of the effectiveness of the engagement system.* Evidence reviewed: • IOC Connects platform (internal social media app)

Criterion	Rating	Comments / Examples of Evidence Consulted
		• External business briefs
		• Monthly staff meetings
		• Town halls with IOC employees
		• COI engagement process
		• 2022 Rio Tinto CSP standards
		• CAP meeting documents
		• Database of 1st nations workers and their qualifications.
		• Indigenous and cultural awareness training.
		• Indigenous consultation training
		• IOC and Rio Tinto SD annual reports
		• Community baseline knowledge report

3. Effective Indigenous Engagement and Dialogue	AAA	1. Engagement processes, as described in Level AA, have been implemented and have resulted in agreements or mutually agreed-to commitments with directly affected Indigenous communities.
		
		2. The facility can demonstrate that it is maintaining the terms of agreements and commitments and is tracking their implementation.
		
		3. The facility is collaborating with communities on mutual objectives identified in Level AA and can provide evidence of progress towards outcomes or benefits.
		
		4. A collaborative assessment process is in place to measure progress in meeting objectives and includes:
		
		    a. Verification of performance with Indigenous communities; and,
		
		    b. Incorporation of adaptive management that can address instances where objectives are not consistently met.
		
		5. Commitment to enhancing awareness on the history, traditions, and rights of Indigenous peoples and intercultural awareness and engagement is demonstrated by at least three of the following:
		
		    a. Facility-wide education, awareness, and/or training on the history, traditions, and rights of Indigenous peoples and intercultural awareness is provided to employees on a regular basis;
		
		    b. On-site cultural activities are supported by the facility;
		
		    c. The facility facilitates and encourages the participation of personnel in community events;
		
		    d. The facility contributes to or participates in local, regional, and/or national level awareness initiatives;
		
		    e. Awareness and education efforts are regularly assessed for effectiveness;
		
		    f. Awareness and education efforts are expanded beyond the facility; and,

Criterion	Rating	Comments / Examples of Evidence Consulted
		g. Traditional and cultural activities/protocols are integrated into business practices
		<u>Evidence reviewed:</u>
		• 4 IBAs with 5 Indigenous groups
		• Indigenous and cultural awareness training.
		• Indigenous consultation training
		• Reporting required under NL Government Indigenous consultation policy
		• Cultural heritage management plan - phase one
		• IOC Indigenous relations steam – lead (1), advisors (2), HR rep (1), procurement rep (1), and environment rep (1)
		• Annual IBA reports
		• Indigenous cultural event summaries
4. Community Impact and Benefit Management	AAA	1. Where such processes do not already exist, the facility is working with COI to implement decision-making processes to empower COI to manage ongoing adverse impact mitigation and benefit optimization after the productive life of the facility ends.
		a. These processes include the identification of potential partnerships and the role of relevant levels of government to ensure the mitigation and optimization can be sustained.
		b. Where opportunities to minimize long term adverse impacts and/or to optimize benefits beyond the productive life of the facility have been identified, they are being incorporated into long-term investment decisions and/or closure plans to ensure they can be sustained in the long term.
		2. Where COI do not already have a shared vision and community development plan (or equivalent) and where COI are interested, the facility provides support to enable COI to begin planning.
		3. The facility collaborates with affected COI on reviewing the effectiveness of:
		a. Actions aimed at optimizing priority opportunities for community benefits; and,
		• b. Actions aimed at mitigating adverse impacts.
		<u>Evidence reviewed:</u>
		• Socioeconomic knowledgebase.
		• Agreements with Smokey Montain, Lab City, Hospital (noise), Menhek nordic ski trail
		• Indigenous relations and Community Social component teams
		• Social risk review (Jan 2023)

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Moss pit - vibration and noise monitors. New ski lifts installed (because engineering was unknown - vibration risks).
		• Smokey mountain dust study. + closed during blasting Mon-Fri 9 to 5.
		• Grants and social contributions
		• Environmental risk register
		• Vulnerable population study (GISTM)
		• Archer system (social risk) and internal MS Teams tracker for CSP related actions
		• NL agreements for local procurement, IBAs for First Nations employment and procurement, Contribution to schools, training of Indigenous students, seniors housing in collaboration with NL gov.
		• Monthly briefs and IOC annual SD report
		• Momentum system (project management software package) - adapted for use for COI projects
		• Laptop school donation benefit review
		• RT CSP std
		• IOC investment decision matrix + community investment committee
		• IOC closure plan
5. COI Response Mechanism	AAA	1. There are mechanisms in place to escalate complaints if not adequately dealt with through the COI response mechanism.
		2. The response mechanism includes post-process follow-up with mechanism users.
		3. A review of the effectiveness of the response mechanism has been conducted and
		identified corrective actions are being implemented.
		Evidence reviewed:
		• Community complaint / concern process
		• HSEC Tracker and MS Teams action tracking tool
		• External brief, IOC Facebook, IOC website
Safety and Health (December 2020 version)		
1. Commitments and Accountability	AA	An internal audit has been conducted to determine:
		• The degree of consistency that the commitments are applied with respect to the intent of the MAC Safety and Health Framework.
		• Whether accountabilities and responsibilities are understood.

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Whether the commitments to safety and health have been communicated to employees, contractors and suppliers at the facility.
		• Whether processes are in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the safety and health commitments.
		Employees at the facility demonstrate their commitment to safety and health.
		Evidence reviewed:
		• 2020 Safety Maturity Model program external audit
		• BCA audit report 2023
		• Rio Tinto - The way we work - Code of conduct Feb 2023
		• Safety maturity model assessment tool
		• IOC Business Conformance audit report 2021
		• Pre-start meetings,
		• IOC Connects application
		• Cognibox (contracts)
		• All staff calls - Teams meetings (typically 300+ people) - Fr and Eng.
		• Leadership in the field (contractors and IOC)
		• Contractor management meetings
		• Monthly HS meetings
		• Observation by the verifier of IOC employees and contractors during an EHS compliance audit conducted in June 2023
2. Planning and Implementation	AA	• An internal audit has been conducted to determine whether planning and implementation of the safety and health management system meets the requirements of Level A.
		• Industrial hygiene risks and controls have been reviewed by a qualified hygienist.
		• The facility has verified that critical controls are in place and functioning, and the definition of critical controls differentiates between critical controls, mitigating controls and underpinning controls.
		Evidence reviewed:
		• JHA forms
		• Take 5 forms
		• IOC-HSE-E-WP Hazard identification and Risk management procedure, V3
		• IOC-HSE-E FLO Level 1 Hazard identification and risk management flowchart

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Mine to Port internet portal
		• Concentrator SOPs
		• Monthly HS snapshot
		• First party monthly assurance reports
		• IOC weekly summaries
		• IH program
		• IH Control monitoring details
		• Health dashboard monthly reports
		• IH monitoring performance report
		• Org chart (VP HSEC Minerals to IOC HSE governance superintendent)
		• 2020 Safety Maturity Model program external audit
		• BCA audit report 2023
		• RT MS Element 10 - Critical risk control group procedure
3. Training, Behaviour and Culture	AAA	• The commitment to safety and health is visibly embedded throughout the facility.
		• Facility management visibly demonstrates commitment with one-on-one interactions with employees.
		• Trainers are assessed for effectiveness.
		• A program is developed to support worker mental health and provide assistance when required.
		Evidence reviewed:
		• On-boarding process
		• Cognibox and My tool (Global RT) records
		• Induction training + specific training
		• Training dept org chart
		• Competency assessments
		• Trainer qualifications
		• Annual business plan and IOC Strategic Map
		• IOC-HSE-E-FRM Purchasing Criteria Checklist
		• STIP, annual performance, and talent reviews
		• 2020 Safety Maturity Model program external audit
		• IOC-FP-E-STD Office and Workplace Design Standard
		• Rio Tinto Global Workplace Principles and Standards (2018)
		• Rio Tinto Work Setting Options

Criterion	Rating	Comments / Examples of Evidence Consulted
		• EHS compliance audit conducted at the Labrador City and Sept-Îles facilities and in June 2023
		• CRM verifications
		• Leadership in the Field program
		• Internal First Party Assurance activities
		• Employee family Assistance program (EFAP) - available for employees and contractors
		• Occupational Health team is affiliated with local mental health and addiction teams
4. Monitoring and Reporting	A	There is a documented safety and health monitoring and reporting program in place that includes: • Performance metrics that are clearly defined, consistently applied, regularly assessed (including against broader industry performance), and internally reported. • Performance metrics used to analyze trends for informing decisions and guiding continuous improvement. • Monitoring program that includes tracking and internal reporting of leading and lagging indicators, safety and health and industrial hygiene inspection and monitoring, health surveillance, and incident investigation and follow up. • A safety and health audit program is in place, and compliance audits and management system audits are conducted in accordance with the audit plan. • The monitoring and audit programs include a focus on high consequence hazards. • The facility assesses the adequacy and effectiveness of its safety and health management system annually and makes recommendations on how to make continual improvement. • Regular management review of safety and health performance for the purpose of continual improvement and to inform decision-making. • Results of workplace monitoring, inspection and follow-up action are recorded and communicated within the facility. • Safety and health performance is communicated to the public on at least an annual basis. Evidence reviewed: • Weekly, Monthly and Annual reporting - incidents, injuries, action status, CRM verifications & actions, Critical Control Monitoring Plans • IOC TV, Info Boards, Security gate, Mine-to-Port Intranet, monthly reports • RT S&E reporting

Criterion	Rating	Comments / Examples of Evidence Consulted
		• First party assurance report • All calls presentation • Monitoring programs • External compliance audit (June 2023) • BCA audit biannually (most recent September 2023) • Internal audit program (FPA) in place since 2020. • Monthly management reviews (Exco + operational GMs) • JOSHE committee posts • Personal sampling results communicated to workers via letters. • H&S performance is reported publicly annually in the Sustainable Development report pg 33 Table 1- Performance data: https://www.ironore.ca/en/sustainability/environment/sustainable-development-reports
5. Performance	AA	Performance targets are set for both leading and lagging indicators. Senior company management regularly reviews site targets and improvement plans through meetings. The facility (or company) benchmarks its safety and health performance against its peers. Evidence reviewed: • Annual HS objectives (leading and lagging indicators, includes contractors) • Monthly management reviews (Exco + operational GMs) • Monthly performance dashboard • SMM annual audit score results (benchmarking)
Crisis Management and Communications Planning - FACILITY (Indicate YES or NO). (November 2018 version)		
1. Crisis Management Preparedness	YES	1. Credible threats and risks have been identified and protocols established to address them. 2. The results of these evaluations have been shared with the corporate office. 3. A Local Crisis Management Team has been established, with defined roles and responsibilities. 4. A notification mechanism is in place to activate the Local Crisis Management Team in the event of a crisis. 5. A media spokesperson has been assigned and trained. 6. The Local Crisis Management and Communications Plan is a controlled document.

Criterion	Rating	Comments / Examples of Evidence Consulted
		7. All Local Crisis Management Team members have been provided the plan and key contact list.
		8. Crisis control centres have been established and equipped in Labrador City, NL (2), Sept-Îles, QC (1), and St. Johns NL (1). Provisions also in place for virtual crisis control centres.
		9. Key media contact and telephone log sheets have been prepared.
		10. Mechanisms to alert employees to a crisis and its developments have been established.
		11. Contact information for key local stakeholders relevant to the credible threats and risks have been prepared.
		12. The facility meets annually with senior members of the local emergency response authorities.
		Evidence reviewed:
		• BRRP version 7.1 dated Feb 2023
		• BRP roster
		• IamResponding (phone application)
		• June 13, 2023 email from the Media Relations Dirtector (draft for communications to media re: wildfires)
		• Connects App
2. Review	YES	1. Local crisis management and communications plans are regularly reviewed and updated:
		a. when there is a change of personnel of those associated with implementation of the crisis management and communications plan; and/or,
		b. every 18-24 months.
		2. The mechanism to notify the crisis management team is tested at least twice per year.
		3. Mechanisms to alert employees to a crisis and its developments are tested at least once per year.
		4. The facility's plan is shared with the corporate office.
		5. Processes exist to ensure that new crisis team members are familiarized with the plan within two months of joining the team.
		Evidence reviewed:
		• BRRP version 7.1 dated Feb 2023
		• BRP roster
		• IamResponding (phone application)
		• June 13, 2023 email from the Media Relations Dirtector (draft for communications to media re: wildfires)
		• Connects App

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Business resilience induction presentation
3. Training	YES	1. "Tabletop" crisis simulation exercises are conducted annually. 2. A full crisis simulation is conducted every three years. Table-top and full-scale crisis simulations are conducted on alternate years at both facilities. That is, when a full-scall is conducted in Labrador City, a desktop is conducted in Sept-Îles and vice versa. In certain instances, an actual crisis situation may be used to replace full-scale crisis simulations. Evidence reviewed: • Operation (keep it on the) Download After Action Report & Improvement Plan May 15, 2023 • IOC-Labrador BRT Post Exercise Report - 'Lima-Alpha', November 2, 2021. Report Issued: December 1, 2021
Preventing of Child and Forced Labour (Indicate YES or NO) (June 2019 version)		
1. Preventing Forced Labour	YES	1. There are processes in place that are commensurate to jurisdictional risks to ensure forced labour, including bonded or indentured or involuntary prison labour is not used. 2. IOC operates in a jurisdiction of low risk of forced labour. Evidence reviewed: • Human rights policy • Modern slavery statement • Supplier code of conduct • Rio Tinto - The way we work • Rio Tinto payment guidelines (10% holdback for workers compensation in NL, payment of sub-contractors in QC).
2. Preventing Child Labour	YES	1. There are processes in place that are commensurate to jurisdictional risks to ensure that no child under the age of 18 engages in work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons as defined in national law or regulation. 2. There are processes in place that are commensurate to jurisdictional risks to ensure that no child under the age of 15 is employed. Minimum age to work at IOC is 18 years of age. Evidence reviewed: • Background check form requiring 2 pieces of ID and birth date • Employee standards outlining respect for applicable laws • Rio Tinto - The way we work (p.16 & 29)

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Copies of the summer student employment form for NL and website application requirements for QC • IOC hiring form which requires birth date and SIN to confirm identify
Climate Change (March 2021 version)		
1. Corporate climate change management	A	1. There is a demonstrated corporate climate change strategy that is supported by defined actions, including integration of the strategy into business planning for existing activities and in considerations for new projects. 2. Board and management structures, accountabilities, responsibilities and reporting processes related to the governance of climate-related risks and opportunities are in place. 3. Material climate-related risks and opportunities and their impact on the company's businesses, strategy and financial planning are identified, assessed, and managed. 4. Materials demonstrating the above criteria are publicly reported on an annual basis. Evidence reviewed: • 2022 Climate Change Report • RT-sustainability-fact-book-2022 • 2022 Climate Change Report (page 28 Enhancing our resilience to physical climate risk) • 2022 Fact Book (GRI Index tab)

2. Facility climate change management	B	1. A basic energy use and GHG emissions management system has been established that includes:
		
		    a. A demonstrated senior management commitment to manage energy use and GHG emissions, with assigned responsibility to a department or individual at the facility level.
		
		    b. Identification and disaggregation of significant sources of energy consumption and GHG emissions.
		
		    c. Identification and estimation of significant sources of non-energy GHG emissions.
		
		2. The facility has conducted some analyses related to physical climate impacts and adaptation.
		
		3. The facility has developed an action plan to meet all requirements for a Level A
		
		Evidence reviewed:
		• SteerCo Meeting & EGHG Working Group presentation - Progress, dashboards and next steps
		• GHG reporting manual
		• Walkthrough documents (PPT) produced for all consumables

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Power Bi • 2022 Climate Change Report • IOC Decarbonization - Final Report • IOC Decarbonization pathway 2023
3. Facility performance targets and reporting	B	1. Energy and/or GHG emissions performance targets have been set. 2. Some public reporting takes place on energy and/or GHG emissions. 3. Standard quantification and estimation methodologies are used to convert energy and GHG emissions data into comparable units, including process emissions data. 4. The company has developed an action plan to meet all requirements for a Level A. Risk identified for attaining the GHG 15% reduction target by 2025. Ongoing discussions regarding potential corrective actions and mitigation plans. Evidence reviewed: • RT GHG Intensity 2018 Baseline (2019 - 2023 YTD) Performance • Performance for port and rail • IOC SD report 2021 • IOC SD report 2022 (draft) • Canada's GHG quantification requirements Dec 2022, V6 (ECCC) • NL A guidance document for reporting GHG emissions for large industry in NL, March 2017 • Performance targets agreed to with the Provincial Government under the Federal Government GHG Regulations (April 6th, 2023 - COR 2023 804 - Correspondence with IOC's COO & Management of Greenhouse Gas Regulations - amendments for 2023 presentation) – Scope 1 and 2 emissions included. • NL GHG Targets June 2023 • RT & NL GHG Targets June 2023 • Emissions explanation for Mitsubishi • NL GHG compliance form for government
Biodiversity Conservation Management (version CAN 2.0, March 2020)		
1. Corporate biodiversity conservation commitment, accountability, and communications	AA	The facility's biodiversity conservation commitment and its implementation underwent external independent verification by EEM EHS Management Inc. in August of 2022. The verification determined that: • All requirements of Level A were met for indicator 1; and, • All requirements of Level A were not met for indicators 2 and 3. • External verification findings were actioned.

Criterion	Rating	Comments / Examples of Evidence Consulted
		Evidence reviewed: • Biodiversity conservation strategy, Oct 16, 2023 • Internal gap assessment April 29, 2021 • 20230606_Memo Environment Training.docx • Biodiversity conservation strategy - 5 year plan • Integrated Assurance Engagement RTM – Iron Ore Company of Canada (IOC) • HSEC Business Conformance Audit (BCA), Sept 2023 • EEM - MAC TSM External Audit of Biodiversity Conservation Management to Attain « AA » Score, Nov 9th, 2022 • IOC Environmental Advisor e-mail Oct 24th 2023
2. Biodiversity conservation planning and implementation	AAA	1. Biodiversity conservation management is integrated into the facility's broader business strategy and includes: a. Investments in research and development that enhance the industry's understanding of and contribution to biodiversity conservation, science, and traditional knowledge (ex., Study on paired trawling. Reduced fish mortality from 89% to 4%. Implemented in 2018. Knowledge shared with the Department of Fisheries and Oceans and the Mining Association of Canada (MAC)). b. Contributing to a greater scientific understanding to the protection of biodiversity (ex. Ongoing bat studies in the Labrador West region – data shared with government of NL, Owl survey conducted in 2023, Rare plant survey on the Western Hillside). c. Contributing to industry or region-specific guidance documents that foster biodiversity conservation (ex. IOC Biodiversity Conservation Strategy and ILM Geospatial Data tool - highlighted by MAC and various auditors. Rio Tinto is considering sharing within the organisation. MAC asked for a presentation to their TSM team). d. Enhancing biodiversity in areas outside of the facility's property (Ex. Enhancement and stream reconstruction of Cowboy Creek which was heavily damaged subsequent to 2013 forest fire. Project undertaken 2016-18. Monitoring program currently in year 6 of 10. Biodiversity is improving. e. Achieving national or regional recognition in biodiversity conservation (Ex. IOC was awarded the Canadian Institute of Mining's Newfoundland & Labrador Branch Environment Stewardship Award for its Biodiversity Conservation Strategy and ILM Geospatial Data tool in 2023). g. Encouraging employee volunteerism in community-based biodiversity initiatives (Ex. Involvement with Ducks Unlimited, Lab West community gardens, (annual wetlands education program led by IOC in a local elementary school). Evidence reviewed:

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Biodiversity conservation strategy, Oct 16, 2023
		• Biodiversity conservation strategy - 5 year plan
		• Priority Biodiversity Features including those of culturally significant
		• Land management and disturbance permit process
		• Integrated Land Management Geospatial database tool
		• Wetlands awareness program for grade 4 students (annually in May), HSE expo where biodiversity aspects may be presented
		• Biodiversity conservation awareness in Cognibox
		• Steerco 2022 presentation May 26, 2022
		• Meeting Minutes Environment Steer Co, 11 April 2022 - Bullet 7.
		• IOC Environmental Advisor e-mail Oct 24, 2023
		• ERECs (eng. requisitions) - environment approval process for projects
		• EEM - MAC TSM External Audit of Biodiversity Conservation Management to Attain « AA » Score, Nov 9th, 2022
		• Study on paired trawling. Knowledge shared with DFO and MAC TSM
		• R&D on bat roosting, swallows
		• Winter multibeam surveys through ice (bathymetry 2021)
		• IOC letter of support to NL gov for SEM bat studies. Feb 2021
		• Cowboy Creek enhancement and stream reconstruction project
		• Great Blue Heron National Award (2004)
		• Involvement with Ducks Unlimited
		• Lab West community gardeners
		• Wetlands Education Program by IOC
3. Biodiversity conservation reporting	**AA**	The public reporting on biodiversity conservation is independently verified or reviewed (internal or external) The facility's public reporting on biodiversity conservation underwent external independent verification by EEM EHS Management Inc. in August of 2022. The verification determined that: • All requirements of Level A were met for indicator 1; and, • All requirements of Level A were not met for indicators 2 and 3. External verification findings were actioned. *Scoring downgraded from AAA to AA due the absence of evidence to the effect that Community of Interest feedback on biodiversity conservation reporting has been publicly reported.* Evidence reviewed:

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Steerco 2022 presentation May 26, 2022 • Meeting Minutes Environment Steer Co, 11 April 2022 - Bullet 7 • Monthly stakeholder briefs • Annual IOC SD report 2021 (+2022 draft) • EEM - MAC TSM External Audit of Biodiversity Conservation Management to Attain « AA » Score, Nov 9th, 2022 • Cowboy Creek enhancement and stream reconstruction project
Tailings Management (June 2022 version)		
1. Tailings management policy and commitment	AA	An external audit has been conducted and determined that all requirements for a Level A have been met. <u>Evidence reviewed:</u> • 2019 completed table of conformance (internal) • Tailings Steer-Co established - 2022 Tailings Management Meeting Minutes • May 2023 - Tailings management review • Tailings Management Plan • Tailings Management Plan Budget allocation. Operational budget and CapEx plan • EEM - MAC TSM External Audit of Tailings Management to Attain « AA » Score, Nov. 2022. • EEM - Closure of MAC TSM External Tailings Management Audit Findings, March 2023.
2. Tailings management system and emergency preparedness	AA	An external audit has been conducted and determined that all requirements for a Level A have been met. <u>Evidence reviewed:</u> • 2019 completed table of conformance (internal) • Wabush Lake ERP • EEM - MAC TSM External Audit of Tailings Management to Attain « AA » Score, Nov. 2022. • EEM - Closure of MAC TSM External Tailings Management Audit Findings, March 2023.
3. Assigned accountability and responsibility for tailings management	AA	An external audit has been conducted and determined that all requirements for a Level A have been met. <u>Evidence reviewed:</u> • 2019 completed table of conformance (internal) • EEM - MAC TSM External Audit of Tailings Management to Attain « AA » Score, Nov. 2022.

Criterion	Rating	Comments / Examples of Evidence Consulted
		• EEM - Closure of MAC TSM External Tailings Management Audit Findings, March 2023.
4. Annual tailings management review	AA	An external audit has been conducted and determined that all requirements for a Level A have been met. Evidence reviewed: • 2019 completed table of conformance (internal) • EEM - MAC TSM External Audit of Tailings Management to Attain « AA » Score, Nov. 2022. • EEM - Closure of MAC TSM External Tailings Management Audit Findings, March 2023.
5. Operation, maintenance, and surveillance	AA	An external audit has been conducted and determined that an OMS manual has been developed and implemented that is in conformance with the OMS Guide. Evidence reviewed: • 2019 completed table of conformance (internal) • EEM - MAC TSM External Audit of Tailings Management to Attain « AA » Score, Nov. 2022. • EEM - Closure of MAC TSM External Tailings Management Audit Findings, March 2023.
Water Stewardship (version CAN 1.0, November 2018)		
1. Water Governance	A	IOC has demonstrated senior management commitment to water stewardship that is consistent with the TSM Water Stewardship Framework. 2. Commitments to water stewardship have been communicated to relevant employees, contractors, and water-related, facility-level COI (Ex. Environmental management and protection training, HSE shares, Compensation agreements). 3. Roles, responsibilities and accountabilities for operational water management and watershed-scale planning are documented in procedures, are inherent to roles (ex. hydrologist), and or are documented in assigned actions (for example in corrective action plans). Evidence reviewed: • HSEC policy • E Standards - E11 Water Quality Protection Standard • Mine Water Management Plan • Mine Effluent Management Plan • Red Water Run-off Management Plan • Tailings Working Group

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Environment Steerco
		• HSE shares
		• Environmental management and protection training slides
		• Roles, responsibilities and accountabilities documented in procedures or are inherent to roles (ex. hydrologist). Also documented in assigned actions (for example in corrective action plans).
2. Operational Water Management	A	1. A systematic approach to operational water management has been established and implemented, and includes:
		a. A site-wide water balance has been prepared for the facility. Water balances are updated on a pre-defined frequency and incorporate monitoring data. Work ongoing to better define certain data points.
		b. A water monitoring program addressing surface water and groundwater, including both quality and quantity parameters, is implemented, and is informed by identified risks and regulatory requirements.
		c. Controls based on identified risks have been established and implemented as planned.
		d. Response and contingency plans for water-related risks and incidents have been established (Ex. exceedances, toxicity fails, structural failures).
		e. Relevant employees and contractors are provided with training that is in accordance with their roles and responsibilities (Ex. tailings personnel trained on flocculant use, mine operations personnel trained on pipes and pumps, contingency plans in case of power outages to prevent total suspended solids in effluents, treatment plant contractors trained).
		Evidence reviewed:
		• Risk Register CR & ZV
		• Legal Register - Nimonik
		• Environmental Risk Register
		• Sampling and monitoring programs
		• Mine Effluent Management Plan,
		• Provincial CofA and federal MDMER monitoring requirements
		• Water metering
		• Water Balance
		• Monitor Pro and PI systems (records)
		• 2021 Water Balance Study (Wood)
		• 2022 YEAR END PUMPED VOLUMES
		• Process Water Intake 2022
		• Environmental incident management procedure

Criterion	Rating	Comments / Examples of Evidence Consulted
		• MDMER Emergency Response Plan • HSE and environmental training in Cognibox
3. Watershed-scale Planning	AA	1. Through engagement with relevant COI, water-related risks and opportunities in the watershed have been identified and prioritized. For example, engagement of COIs regarding risks and opportunities occurs during: • environmental assessments undertaken for new mining pits; • discussions with COIs regarding issues of concern (Ex. impacts to local lakes resulting from pit dewatering activities). 2. The facility communicates with relevant COI to help them understand how operational water management practices address the priority watershed-related risks (Ex. through the permitting processes, Indigenous and other COI consultations, Bureau d'audiences publique sur l'environnement (BAPE) consultations for dredging in the port of Sept-Îles, QC). 3. For priority risks beyond the control of the facility, the facility participates in watershed governance for a to evaluate and develop collaborative response options. (Ex. IOC assisted Labrador City in the investigation of a fish death occurrence outside of the area of control of facility, BAPE consultations for dredging in in the port of Sept-Îles, IOC is a partner in Northern Institute for Research in Environment and Occupational Health and Safety whose mission is to conduct research relating to environmental sciences and occupational health and safety. Evidence reviewed: • Integrated Land Management tool • 2021 Water Balance Study (Wood) • Water-related communities of interest • IOC Indigenous Consultation Report • Non- Domestic Well Construction and Water use License Luce, Humphrey, & Moss Pit October 3.pdf • W60 - Town of Labrador City Presentation Western Hillside Project EW.pdf • White Wolf Trail Association.pdf • Socioeconomic study, environment assessment registrations, Indigenous Committee • MDMER schedule 5 - EEM (comparison with lake that is not impacted by IOC activities. • First nations consultations • Compensation plans with government • Land use studies • Environmental Assessments registrations

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Regular Stakeholder meetings CAP
		• Public audience (BAPE) for Dredging
		• ILM Tool
4. Water Reporting and Performance	B	Water performance objectives and targets have been established for relevant water risks and/or opportunities. These are monitored and reported to senior management and the corporate function. Evidence reviewed: • Baseline established (2019-2021 average). Target - remain at current consumption levels.
Equitable, Diverse, and Inclusive Workplaces (version CAN 1.0, June 2023)		
1: Leadership and Strategy (Corporate Criteria	AA	1. The requirements of Level A are implemented at the corporate level and are flowed down to the facility level. 2. There is a process for ongoing engagement to review and update the corporate strategy which is based on data obtained through the Everyday Respect survey report (2020). Annual reviews of strategies conducted both at the corporate and facility levels. An independent audit and review of progress against the recommendations Everyday Respect Report is planned for 2024. 3. Workers receive updates on implementation of the corporate strategy and the number and types of issues reported to the organization's reporting and response mechanisms. 4. Objectives are set for equitable, diverse, and inclusive recruitment, retention, and representation among corporate leadership, with public reporting on progress towards these objectives via Rio Tinto global annual reports. Evidence reviewed: • Rio Tinto - Everyday-respect-report • Rio Tinto - The Way We Work (Code of conduct) • Rio Tinto – Inclusion and Diversity Policy • IOC HR-330-4 Respect Inclusion and Diversity Policy • IOC Everyday Respect 2023 planning • Strategy_IOC_EN.pdf • Engaged_workforce_charter – DRAFT for discussion SLT – July 2023.pptx

Criterion	Rating	Comments / Examples of Evidence Consulted
		• IOC Training LAC_Safe Caring Inclusive.pptx
		• Everyday Respect_Progress_update_Q1 & Q2 2023_EN.pdf
		• IOC Everyday Respect – Quarterly Update – Q2 2023.pdf
		• Article: "Building Everyday Respect through care, courage and curiosity" training program for all employees is now available – Rio Tinto Connect
		• New Cultural Awareness Training series for employees in Canada and the Americas.pdf
		• https://connect.riotinto.com/content/page/6375b25fa940b06264e3760b
		• Promotion of Everyday Respect work on IOC Connex.png
		• Group news Rio Tinto scorecard - Q1 results
		• rt-second-quarter-operations-review-2023-pdff.pdf
2: Advancing Equity, Diversity, and Inclusion (Facility Criteria)	A	1. Processes are in place to foster a workplace culture of equity, diversity, and inclusion. These are informed through engagement with a cross-section of people who bring diverse perspectives and experiences. This includes relevant labour or worker groups and individuals who are underrepresented in the mining industry. The processes include: a. Clear roles, responsibilities, accountabilities, and resources to promote shared responsibility for equity, diversity, and inclusion in place (Ex. Every Respect facility lead, project lead responsibilities defined, training which supports responsibilities for all, corporate roles defined). b. Review of existing processes underway by an external organization (both at global and facility levels). Scope includes recruitment, performance management, skills development, retention, and advancement, to identify biases or barriers to equity and inclusion. c. Rio Tinto has a clear and transparent practice of ensuring pay equity. 2. Training or awareness programs related to equity, diversity, and inclusion are available to all workers and management. Evidence reviewed: • Community Brochure_2022.pdf • WHAT IS-Pay Equity (GBL).pdf • IOC Everyday Respect – Quarterly Update – Q2 2023.pdf • Early Career Network IOC _ Framework + Enhanced Support Model – May 2023.pdf • Promotion of I+D Training_Jun22 • Anti-racism Training_Jul20 • Contractor Listening Session Plan – July 2023 • Rehire check and assessment Guidance Note (GBL).pdf

Criterion	Rating	Comments / Examples of Evidence Consulted
		• Q_A_IBAs_and_Indigenous_Relations.pdf • Indigenous Participation - Iron Ore Company of Canada • IOC Training LAC_Safe Caring Inclusive.pptx
3: Monitoring, Performance, and Reporting (Facility Criteria)	A	1. Data collection and reporting are informed through engagement with a cross-section of people who provide diverse perspectives and experiences. 2. The facility publicly reports information on demographic diversity, via annual reports, and conducts ongoing monitoring and analysis. 3. Where worker information or feedback is requested as part of information gathering process there is clear communication to workers of: a. The purpose for which the information or feedback will be used. b. The confidential and voluntary nature of participation in the process. c. Processes to protect anonymity when analyzing and communicating results. d. Safe and ethical storage, and intended use, of any data or information collected. <u>Evidence reviewed:</u> • Everyday Respect report • Power BI printscreen.png • Everyday Respect action plan • RT-Data-privacy-standard(6).pdf • Rio Tinto_Group Update_People Survey.pdf • Contractor survey (confidential Aug Sept 2023)

Statement of Verification

Statement of Verification	
The external verification was conducted in accordance with the TSM Verifier Terms of Reference and, accordingly, consisted primarily of interviews, data analysis, and examination (on a sample basis) of other evidence relevant to management's assertion of conformance to the requirements of the TSM performance indicators.	☒ The external verification was conducted in accordance with the TSM Verifier Terms of Reference.
The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.	☒ The scores in this report are considered accurate based on this verification.

Statement of Verification	
Limitations	No limitations were encountered that hindered the attainment of the verification objectives.
Additional comments	The facility originally included the June 2023 version of the Health Safe, Healthy, and Respectful Workplaces Protocol in the scope of the external verification but decided to revert to the December 2020 version of the protocol during the verification.
Has an additional assurance statement been provided by the verifier?	No other assurance statement has been provided by the verifier.
Name of verifiers	Ross Szwec, DGE, CEA®, EP(EMSLA), CESA®, VSP Evelyne Desaulniers, eng., M.Sc. A., PMP, VSP (Conducted community of interest interviews)
Date of statement of verification	March 22nd, 2024
Signature of verifiers	Ross Szwec Evelyne Desaulniers