



RCS

GLOBAL GROUP

AN SLR COMPANY

PROPRIETARY AND CONFIDENTIAL

TSM VERIFICATION SUMMARY REPORT

DIAVIK DIAMOND MINES (2012) INC.

8-11 April 2024



1. Facility Information

Name of company	Diavik Diamond Mines (2012) Inc.
Name of facility	Diavik Diamond Mines (2012) Inc.
Address	Offices: Diavik Diamond Mine, 300 Northwest Tower, 5201 Franklin Ave, Yellowknife, NT X1A 3S9, Canada Mine: Northwest Territories, Canada, coordinates 64°29'46"N 110°16'24"W
Country of operation	Canada
Products/ metals produced on site	Diamonds
Types of operations included in scope:	
Mining	X
Concentrate blending	
Smelting	
Refining	
Other (please explain)	Product Splitting Facility (PSF) of Diavik which is a critical processing plant handling operations for the Diavik and Gahcho Kue diamond mines in Northwest Territories, Canada. It manages the cleaning, sorting, and shipment of diamonds extracted from these mines.
Types of infrastructure included in scope:	
Roads	
Rails	
Ports	
Other (please explain)	Airport

2. Verifier and Verification Information

Verification firm	RCS Global Ltd. 1 Bartholomew Lane, EC2N 2AX, London UK contact@rcsglobal.com
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	Yes
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	26/02/2024 – 29/02/2024 08/04/2024 – 11/04/2024
Verification period	01 April 2023 – 31 March 2024
Summary of the verification methodology	<ul style="list-style-type: none"> • Desktop review including document and records review, and interviews during the period 26/02/2024 – 29/02/2024 • Reconnaissance visits to the mine site and to the PSF, with further document and record review and interviews during the period 08/04/2024 – 11/04/2024
Summary of the verification activities	<ul style="list-style-type: none"> • Reconnaissance visits to the mine site and PSF • Interviews with the worker and management team representatives of the auditee

	<ul style="list-style-type: none"> • Document review • Records review
--	---

3. Summary of Findings

Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Comments
Indigenous and Community Relationships		
1. Community of Interest (COI) Identification	AAA	<p>The auditee employs a systematic and documented annual process for Communities of Interest (COIs) identification, utilizing interviews with diverse personnel to ensure thorough coverage, including under-represented COIs within the local context.</p> <p>COIs identification processes are documented, ensuring transparency and accountability in the identification and engagement of COIs.</p>
2. Effective COI Engagement and Dialogue	AAA	<p>The auditee prioritizes engagement with COI, particularly Indigenous people, by classifying COIs based on their impact and leverage and implementing additional actions for Indigenous stakeholders' participation. Engagement processes are managed within a regulatory framework, ensuring compliance with relevant requirements.</p> <p>The only COI for the mine site is the 5 Indigenous communities with who the auditee has entered into participation agreements / impact benefit agreements. The communities are: Tł̨ch̨ Government, the Yellowknives Dene First Nation, the North Slave Métis Alliance, the Kitikmeot Inuit Association, and the Łutsel K'e Dene First Nation.</p> <p>The auditee maintains a system to track community feedback and concerns.</p> <p>The auditee has established engagement processes, including annual stakeholder identification and close engagement with Indigenous stakeholders.</p>
3. Effective Indigenous Engagement and Dialogue	AAA	<p>The auditee exhibits a clear dedication to engaging with Indigenous stakeholders, recognizing their importance and implementing additional actions for their involvement.</p> <p>The auditee demonstrates a commitment to fostering dialogue with directly affected Indigenous communities.</p> <p>Processes are either being developed or already implemented to facilitate dialogue with Indigenous communities. These processes are designed to determine the priorities and concerns of Indigenous communities and are informed by local</p>

		languages, customs, and legal frameworks, reflecting a commitment to culturally sensitive engagement.
4. Community Impact and Benefit Management	AAA	<p>Senior management has shown commitment to identifying and mitigating adverse impacts related to the facility's activities affecting Communities of Interest (COI), as well as striving to optimize benefits to those communities.</p> <p>Roles and responsibilities for implementing the commitment to identify and mitigate adverse impacts have been assigned.</p> <p>Auditee demonstrates efforts to mitigate identified adverse impacts, a human rights due diligence management system is under implementation and expect to be completed by end-2024</p>
5. COI Response Mechanism	AAA	<p>A structured system is in place to monitor complaints and concerns from community auditees related to different aspects of community development.</p> <p>Cultural heritage information and feedback are gathered through traditional panels, indicating a commitment to involving community voices in decision-making.</p> <p>There is a process managed by the regulatory body concerning community development, hinting at a potential framework for formalizing feedback mechanisms in the future.</p>
Safe, Healthy and Respectful Workplace		
1. Commitments and Accountability	AAA	<p>The auditee has a "Diavik Health & Safety Policy", which refers to the corporate health & safety policy. The site policy is signed by the site director and was observed to be widely distributed.</p> <p>Workers were interviewed to review their knowledge and understanding of the health & safety policy. Overall, workers and managers demonstrated a comprehensive understanding of the content and intent of the policy.</p> <p>The auditee's Contractor Management Team conducts onboarding, and review of contractor competency. Site induction is conducted, and contractor staff receive the same orientation and training as all other site workers, which includes reference to the site's health & safety policy.</p> <p>Audits are conducted internally & externally to review performance against internal standards, and industry standards.</p>
2. Safety and Health Management Systems	AAA	<p>The auditee employs a comprehensive and robust health & safety management system. The auditee's Health & Safety Policy, which refers to the corporate health & safety policy, is signed by the site director.</p>



		<p>The auditee employs and implements corporate “critical risk” management standards for the most important occupational and mine safety risks at the site. Each standard has a Nominated Manager or “Champion” at the site level. The auditee hosts regular (monthly) sessions to review performance against the standards, facilitated by the site safety advisors. These Champions, along with the site director, are accountable for implementation of the risk-specific standards.</p> <p>The auditee has implemented Rio Tinto “C-Standards” and “D-Standards” providing control over significant risks and hazards. Management Plans for each D- Standard with associated Directives for each sub-standard (e.g., ground control, inundation of solids, in rush of water, etc.). These Directives are used to define controls on a per-task, per-day basis, with each operator signing off to demonstrate training / understanding.</p> <p>Detailed risk registers have been developed. The auditee uses different levels of risk assessment depending on the potential risk, up to and including Team Based Risk Assessment (TBRA). TBRA’s have been developed for all activities on site. Qualified safety advisors participate in the review of all new activities at site.</p> <p>The site tracks performance for lagging and leading indicators associated with critical risks. Performance is summarized on a Critical Risk Management (CRM) dashboard which is circulated weekly to the auditee leadership team.</p> <p>Critical risk control procedures have been reviewed to confirm compliance with Territorial (legal) requirements. Legal registers / concordance tables exist for each of the risks. Audits are conducted internally to review performance against internal standards, and industry standards.</p> <p>The auditee has employed 2 certified industrial hygienists (CIH) to review and manage occupational exposure risks. Health surveillance including audiometry (annual), periodic health assessments (fit for work) for staff over 60 (annual) and over 45 (biannual), as well as silica sampling / occupational exposure monitoring.</p> <p>The auditee was at the time of the audit rolling out a program called “Not myself today”, designed to address psychosocial hazards and harmful behaviors, and potential risks. This process existed toward the end of the verification period. Full-time counsellors are on-site and on-call, and available for workers and contractors. The auditee reported that counsellors were available during the recent aviation accident, and the systems and tools were put to the test.</p>
3. Psychological	A	There was evidence available to demonstrate that



<p>Safety and Respectful Behavior</p>		<p>the auditee has implemented processes and programs to promote psychological safety and respectful behavior in the workplace.</p> <p>There was no evidence that the auditee practices or condones any form of discrimination in the workplace.</p> <p>Interviews with workers and managers confirmed that general awareness training is provided to staff regarding discrimination and unconscious bias. Managers and supervisors are trained to recognize signs of discrimination. Observed non-discrimination policy / communications posted in the lunchrooms at PSF and at the mine.</p> <p>Members are required to ensure that all individuals who are 'fit for work' are given equal opportunities and are not discriminated against on the basis of factors unrelated to their ability to perform their job.</p> <p>As noted previously, the auditee was at the time of the audit rolling out a program called "Not myself today", designed to address psychosocial hazards and harmful behaviors, and potential risks. This process existed toward the end of the verification period. Full-time counsellors are on-site and on-call, and available for workers and contractors. The auditee reported that counsellors were available during the recent aviation accident, and the systems and tools were put to the test.</p> <p>The auditee has established several mechanisms for feedback / grievance. Grievance is managed through the auditee's Human Resources department. A QR code can be scanned for complaints / concerns / ideas to be reported anonymously. Communications (posters, emails, communications, etc) were observed around the mine and PSF to document the process.</p> <p><u>There was no evidence that the auditee communicates to its broader supply chain its policies and processes to promote psychological safety and respect. We have no evidence to confirm that the auditee sets performance objectives, or applies performance objectives at the corporate level, with regards to psychological safety and respect.</u></p> <p><u>We are not aware of an internal audit of psychological safety with results of the internal audit being communicated to workers and reported publicly.</u></p>
<p>4. Training, Behavior and Culture</p>	<p>A</p>	<p>It was obvious from interviews and observations that health & safety training is comprehensive. The member provides training and information about health and safety to all employees and contractors. Training covers critical risk management, including "Life Saving Rules" as well as psychological safety</p>



		<p>and respectful behavior.</p> <p>Training is job specific and workers are expected to sign off to demonstrate understanding of health & safety roles and responsibilities. The auditor went through a rigorous training program in order to be allowed to visit the mine site.</p> <p>Training requirements are defined, scheduled and each worker receives site-specific training based on an Individual Training Plan. Each department defines its own training needs. Competency checks include reading, understanding of operations manuals / work instructions for equipment (including safety requirements), and a written exam. Workers also review and sign off on their understanding of relevant standard operating procedures.</p> <p>General worker and contractor induction / orientation training lasts approximately 8 hours, covering environment, land disturbance, roles and responsibilities, Indigenous knowledge, waste management, etc. Induction is repeated for all staff every 3 years.</p> <p>The auditee tracks performance for lagging and leading indicators associated with critical risks, reports, and verifications / inspections, etc. Performance is summarized on a Critical Risk Management (CRM) dashboard which is circulated weekly to the leadership team. Each department completes daily CRM Board reviews. "Embracing the Red" promotes sharing of learnings, near misses, etc. Departments use a traffic light system to track performance, and to draw attention to important issues and risks. Leadership is responsible for inspections, and supervisors have targets for inspections.</p> <p><u>We have no evidence that compensation is affected by safety and health performance, or that specific guidelines have been implemented for workplace design and culture that prioritize physical and psychological safety.</u></p>
5. Monitoring and Reporting	AAA	<p>The auditee has an industry leading incident investigation program. All health and safety incidents result in a review of relevant hazard controls to identify opportunities for improvement. All incidents are investigated using the "5 whys" methodology. More significant incidents - potentially fata incidents (PFI), and those incidents resulting in injury or lost time - are subject to more detailed investigation using InterSafe "Essential Factors". A safety advisor is involved in PFI investigations, along with subject matter experts. The site director is accountable for the incident / investigation and so this places priority on the process. An example incident investigation (a D3 incident from February 2023) evidenced comprehensive investigation with subject matter</p>



		<p>experts, resulting in recommendations on improvements to prevent reoccurrence of future incidents.</p> <p>The site tracks performance for lagging and leading indicators associated with critical risks. Performance is summarized on a Critical Risk Management (CRM) dashboard which is circulated weekly to the auditee leadership team.</p> <p>Results of workplace monitoring, inspection and follow-up action are communicated within the facility. Sample testing result like dust, Diesel and Water was public and widespread through information board</p> <p>Audits are conducted internally to review performance against internal standards, and industry standards.</p>
6. Physical Safety and Health Performance	AAA	<p>Physical safety and health performance targets are set for employees of the facility.</p> <p>Performance targets are set for both leading and lagging indicators. Senior management reviews performance against facility targets and associated improvement plans.</p>
Crisis Management and Communications Planning (Indicate YES or NO)		
1. Preparedness	Yes	<p>The CEO has endorsed and demonstrated support for crisis management and communications planning. The CEO's support is demonstrated within the Company's Business Resilience Management Plan.</p> <p>The Business Resilience Management Plan (recently updated December 2022) is a site-specific document that describes the process of identifying and assessing risk.</p> <p>A Crisis Management Team has been established, and a Crisis Management and Communications Plan has been developed. The auditee's Crisis Management Team is made up of site leadership, legal, finance, communications, human resources, IT, security, etc. The site-specific Crisis Management and Communications Plan includes a contact list, and clearly communicated roles and responsibilities.</p>
2. Review	Yes	<p>The company's crisis management system- Business Resilience Management Plan, is reviewed regularly, at least annually. The system was most recently tested on January 23, 2024, as a result of a real event, with the downing of an aircraft en route to site from Fort Smith.</p> <p>The Business Resilience Management Plan describes mechanisms to update and alert workers and managers to crisis or other issues that require the timely communication of information.</p> <p>A British Aerospace Jetstream Plane crashed into woods near the departure town of Fort Smith. The</p>

		charter flight was carrying five auditee workers and two flight crew members. Only one worker survived the accident. Canada's Transportation Safety Board (TSB) continues to investigate the accident.
3. Training	Yes	The auditee's Crisis Management Team has been trained (including tabletop crisis simulation exercises and full crisis simulations) on the Crisis Management and Communications Plan and on the Business Resilience Management Plan.
Preventing of Child and Forced Labour (Indicate YES or NO)		
1. Preventing Forced Labour	YES	<p>The auditor examines various documents, such as employment contracts and identification records, to ensure there are no indicators of coercion or involuntary servitude. Special attention is given to verifying that workers have voluntarily entered into their employment agreements.</p> <p>Working conditions are scrutinized to identify any signs of forced labour, such as restricted movement, confiscation of personal documents, or excessively long work hours beyond legal limits. Any potential instances of coercion or duress are thoroughly investigated.</p> <p>Worker interviews confirmed that employees feel free to terminate their employment without fear of reprisal or consequences. Additionally, there were no reports of coercion or pressure within the working environment.</p>
2. Preventing Child Labour	YES	<p>The auditee conducts a meticulous review of age verification documentation, including birth certificates or government-issued IDs, for every individual engaged in the value chain.</p> <p>Attendance records and work hour logs undergo thorough examination to ensure compliance with legal working age requirements and to prevent any instances of excessive or irregular working hours.</p> <p>Interviews with workers are conducted to ascertain their awareness of their age upon employment, understanding of labour laws, and assessment of working conditions.</p>
Climate Change		
1. Corporate Climate Change management	AAA	<p>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. This is documented in the Rio Tinto Climate Report 2022, which was made available to the auditors.</p> <p>The company has made and communicated publicly its commitments to climate action that are consistent with the ambition to limit global warming to well below 2°C (above pre-industrial levels), with short- and long-term targets and actions planned to achieve these commitments. Specifically, Rio Tinto has made commitments for reduction of GHG for 2025 / 2050, with a 15%</p>



		<p>reduction in GHG emissions goal by 2025, and a net zero goal by 2050.</p> <p>The Rio Tinto website has a Climate Change page which refers to long term commitment for climate action and climate investment. It reports that USD 7.5 Billion will be invested in decarbonization technologies. Marginal abatement costs have been established by the Company as part of go/no go for renewable energy projects (with that marginal abatement cost set at USD 70/tonne). The Marginal Abatement Cost (MAC) document was made available to the auditors.</p>
<p>2. Facility Climate Change Management</p>	<p>A</p>	<p>The most significant closure risk is the impact of climate change on the processed kimberlite containment (PKC) facility as a result of thermal warming. The containment infrastructure (consisting of 50 km of dams some up to 50 m high) sits on permafrost. Closure planning is incorporating climate change into designs following Mining Association of Canada and TSM guidance. Closure design for critical structures has incorporated a “worst-case” climate change scenario.</p> <p>The focus for climate change assessment has been closure planning. The auditee’s goal is for permafrost to encroach in up into the PKC Facility and more specifically to increase the structural integrity of dikes and dams. A 100-year climate change scenario still sees these piles staying frozen. Climate change modelling was initiated in 2008, and was used for design of the North Country Rock Pile. Climate change modelling was updated in 2022 considering worst-case climate change scenario (95%) and mid case climate change scenario (50%). Designs for critical (external dam) structures incorporate worst case climate change scenarios.</p> <p>Data on Scope 1 and 2 GHG emissions is maintained by the auditee. Emissions sources have been identified for the mine site and the PSF, and Scope 1/2 emissions have been calculated. Scope 2 emissions are limited to those from the PSF in Yellowknife. All other emissions are Scope 1 – through the consumption of diesel fuel for electricity generation and heating. Emissions data is reported monthly to the company’s Social & Environmental (S&E) Survey. Emission Factors are provided by Corporate (for the S&E survey) for the calculation of GHG emissions.</p> <p><u>The auditee has not inventoried Scope 3 emissions at the site level, due to the plan for closure.</u> Rio Tinto has developed a Scope 3 emissions summary, but nothing exists for the site.</p> <p>The auditee has a basic Energy Management System. There is no formal process for energy reduction. The auditee relies on brainstorming</p>



		<p>around processes and generating ideas through regular meetings. Energy efficiency meetings are set up by the auditee's Business Improvement Department, to bring together staff from key functional areas to brainstorm ideas and opportunities. "Momentum" is a platform that is used by the site to identify cost-saving / energy efficiency ideas.</p> <p><u>The auditee's energy and GHG emissions management system has not undergone an internal or external audit.</u> There are no certifications to ISO 14064/65, and no certifications or audits to the ISO 50001 standard for EnMS. There is no evidence of internal audits of the energy management systems. Some internal audits have been completed to verify energy savings projects.</p> <p>The main driver for reduction of energy use is cost, associated with the purchase, transport and consumption of about 90 MM litres of fuel oil each year. The auditee has established a site-wide power monitoring system (Energy Excellence) which allows monitoring of energy usage by department / equipment. There are no site-specific targets for energy reduction or energy efficiency.</p> <p>As part of its closure plan, the member has invested in 4 wind turbines which provide 10% of current power needs. At the time of the audit, the member was installing a solar farm to provide additional power. When mining activities cease in around 2026, the use of electrical energy will significantly drop due to the elimination of underground mine workings heating. Wind and solar will continue to provide power to the site during closure activities, through to 2029.</p>
<p>3. Facility performance Targets and Report</p>	<p>A</p>	<p>The auditee reports publicly on its operational environmental performance, including with respect to climate change adaptation and mitigation. https://www.riotinto.com/Operations/canada/diavik</p> <p>The auditee's Closure Manager is regularly engaged in conversations with the social / communities' group, for disclosure and engagement regarding climate change risk and impacts. The auditee's Impact Benefits Agreements / Participation Agreements with 5 Indigenous groups facilitates direct engagement between Diavik and the communities. The auditee reported that much of the dialogue relates to climate change, and the impacts of change on the facility. The auditee's Final Closure and Reclamation Plan has been submitted to the regulator (Wek' èezhii Land and Water Board - WLWB) and is currently going through public review which includes review by these 5 Indigenous groups.</p> <p>There have not been significant changes in the</p>



		<p>verification period, in terms of energy consumption or GHG emissions. The solar farm will reduce overall consumption and emissions by about 10%. The GHG footprint of the mine will drop dramatically when the mine closes and underground heating is no longer required.</p> <p><u>The auditee has not inventoried or reported Scope 3 emissions at the site level, due to the plan for closure.</u></p> <p><u>Energy use and Scope 1 and 2 GHG emissions (e.g., source data, conversion factors, energy GHG intensities used, etc.) have not been independently assured.</u></p>
<p>Biodiversity Conservation Management</p>		
<p>1. Corporate biodiversity conservation commitment accountability, and communications</p>	<p>AA</p>	<p>Rio Tinto has established a series of environmental standards that apply to site operations, including: E16 – Biodiversity protection and natural resource management. Site-specific Management Plans are then established by the Facility to document how it will apply the corporate standard, and to incorporate commitments and directives from regulators. Conformance table in each document matches regulatory requirements with site-level plans and programs. A compliance calendar is used to schedule / plan / track compliance submissions.</p> <p>Senior management biodiversity commitment is in place and is consistent with the intent of the TSM Mining and Biodiversity Conservation Framework. The company has published a Biodiversity and Natural Resource Management Policy, and this framework document was observed around the mine site and the PSF. Roles, responsibilities, and accountabilities for implementation of the commitment are clear, and resources have been assigned to support implementation of the commitment. The Environmental Roles and Responsibilities of the company are defined in a reviewed document ENVI-44-0415.</p> <p>The Indigenous communities with whom the auditee has participation agreements require regular communication and engagement regarding the results of biodiversity monitoring and site performance. The auditee has worked to incorporate Traditional Knowledge into its Wildlife Management and Monitoring Plan, e.g. Wolverine track surveys conducted with Indigenous community member, Peregrine Falcon regional survey conducted by GNWT partially funded by Diavik, Caribou tracking program undertaken by SUNY (University) and partially funded by Diavik.</p> <p><u>The company's biodiversity conservation commitment does not include a stated ambition of no net loss.</u></p> <p>Business Conformance Audits (BCAs) are conducted annually and include an audit of site</p>

		<p>conformance with the Rio Tinto Biodiversity and Natural Resource Management Standard.</p>
<p>2. Biodiversity conservation planning and implementation</p>	<p>AAA</p>	<p>There are no Key Biodiversity Areas (KBAs) in the area of Lac de Gras / Diavik. There are no legally designated protected areas in the area of influence of the site.</p> <p>The site is not listed as a World Heritage site.</p> <p>GNWT Department of Environment and Natural Resources requires that the auditee develop and implement a Wildlife Management and Monitoring Plan (WMMP), under GNWT Wildlife Act. The auditee is subject to a Tier 3 WMMP which requires a management and monitoring plan that contributes to regional-scale wildlife monitoring, and/or cumulative effects research, assessment or management. Site's WMMP most recently updated in October 2022. This is the umbrella document that governs the site standard operating procedures for wildlife management and control, aquatic effects monitoring, etc. Species-specific Management Plans have been established to formalize commitments and directives from regulators.</p> <p>The International Union for Conservation of Nature's (IUCN) Red List of Threatened Species include 11 wildlife species of concern that are present in the area of the site and are documented in the auditee's Wildlife Management and Monitoring Plan. The WMMP implements controls to ensure that their operations will not lead to significant decline. The WMMP commits to and employs the mitigation hierarchy to avoid, minimize and rehabilitate impacts on biodiversity and ecosystem services.</p> <p>The auditee was able to demonstrate that wildlife management and biodiversity monitoring is integrated into core business planning, budgets and plans established by the auditee each year. The auditee's Environment Team undertakes biodiversity monitoring, as a condition of site permits and licensing commitments. The auditee is required to submit annual reports on the WMMP to the regulator. The Environmental Monitoring Advisory Board (EMAB) which was created through the environmental assessment process to oversee ongoing environmental performance at the site, pays particular attention to biodiversity management. The EMAB is made up of external advisors, consultants and representatives of 5 Indigenous communities with whom the auditee has participation agreements / Impact Benefit Agreements. Any changes to site activities are reviewed and evaluated through the EMAB.</p> <p>Facility-level personnel have been assigned responsibility for biodiversity conservation management. The auditee's Superintendent,</p>



		<p>Environment & Closure, and Advisor, Environment Department have responsibility for the execution of the auditee's biodiversity and conservation management programs, including the WMMP. Progress towards biodiversity objectives is tracked and reported to facility-level senior management.</p> <p>Traditional Knowledge (TK) is incorporated into the Wildlife Management and Monitoring Plan and the Aquatic effects Monitoring Plan. The auditee holds regular TK "camps" which include water testing, fish testing, with elders teaching youth and site staff about TK.</p> <p>The Facility's training department provides general training to auditee staff and contractors with regards to overall biodiversity and conservation requirements. Focused "update" training is provided by the Facility for Caribou, Waste, Spills, Grizzly Bears, etc. by the Environment Department.</p> <p>As noted previously, the Indigenous communities with whom the auditee has participation agreements require regular communication and engagement regarding the results of biodiversity monitoring and site performance. The auditee has worked to incorporate Traditional Knowledge into its Wildlife Management and Monitoring Plan, e.g. Wolverine track surveys conducted with Indigenous community member, Peregrine Falcon regional survey conducted by GNWT partially funded by Diavik, Caribou tracking program undertaken by SUNY (University) and partially funded by Diavik.</p>
<p>3. Biodiversity conservation reporting</p>	<p>AAA</p>	<p>The facility reports on biodiversity conservation to facility-level senior management on a regular basis.</p> <p>The facility routinely reports on biodiversity conservation performance to the EMAB. The Environmental Monitoring Advisory Board (EMAB) which was created through the environmental assessment process to oversee ongoing environmental performance at the site, pays particular attention to biodiversity management and requires regular reporting on performance against the relevant conditions of site approval, and the planned arrangements of the WMMP. The EMAB includes representatives of 5 Indigenous communities with whom the auditee has participation agreements / Impact Benefit Agreements.</p> <p>The auditee's reporting on biodiversity conservation is independently verified or reviewed. The auditee's Environmental Agreement annual report summarizes compliance with all the relevant commitments and conditions, and is reviewed by GNWT, EMAB, and the Indigenous communities. The performance reports are also subject to third party review by consultants that are retained by GNWT, EMAB, and the Indigenous communities.</p>



		<p>https://www.riotinto.com/Operations/canada/diavik https://www.riotinto.com/en/sustainability/environment/biodiversity</p>
Tailings Management		
1. Tailings Management Policy and Commitment	AAA	<p>The Company has a corporate policy and standard related to tailings management, which has been translated into site-specific management plans. The standard is defined as a Critical Risk Management (CRM) plan “D5 Management of Tailings and Water Storage Facilities”.</p> <p>The policy document identifies roles and responsibilities including the accountable executive. An accountable D5 Nominated Manager has been identified for the auditee, for the processed kimberlite containment (PKC) facility (the tailings facility). The auditee has also identified a Responsible Dam Engineer. The Site Director has ultimate responsibility for the performance of the tailings management facility at the site level.</p> <p>The tailings management system (TMS), including the Operation, maintenance, and surveillance (OMS) and the emergency preparedness and response plans, are audited regularly. The auditee is subject to a D5 Independent Operational Review every 2 years, which includes a detailed review of the OMS. An internal TSM audit is completed regularly. The auditee commissioned a third party to complete an external TSM audit using the table of Conformance (2022 version) in Jul-2024, this external audit includes evaluation of the effectiveness of the policy and commitments.</p>
2. Assigned Accountability and Responsibility for Tailings Management	AAA	<p>As noted above, the auditee has adopted the Company’s corporate policy and standard related to tailings management, which has been translated into site-specific management plans. The standard is defined as a Critical Risk Management (CRM) plan “D5 Management of Tailings and Water Storage Facilities”. There are several accountable executives with assigned responsibilities under the D5 standard. An accountable D5 Nominated Manager has been identified for the PKC facility (the tailings facility). The auditee has also identified a Responsible Dam Engineer.</p> <p>In accordance with its corporate standard, the auditee has also established a Geotechnical Review Board (independent – looks at tailings and other areas) and also an Independent Design Review Board.</p> <p>In accordance with the site approval, the auditee has assigned an Engineer of Record (EOR) for the tailings management facility, which for the auditee is the consulting firm WSP.</p> <p>The TMS, including the OMS and the emergency preparedness and response plans, are audited</p>



		<p>regularly. The auditee is subject to a D5 Independent Operational Review every 2 years, which includes a detailed review of the OMS. An internal TSM audit is completed regularly. The auditee commissioned a third party to complete an external TSM audit using the table of Conformance (2022 version) in Jul-2024, this external audit includes evaluation of the effectiveness of assignment of accountability for tailing management to the accountable Executive officer, and delegation of responsibility & authority for tailings management</p>
<p>3. Tailings Management System and Emergency Preparedness</p>	<p>AA</p>	<p>The site's tailings management facility is referred to as the Processed Kimberlite Containment (PKC) Facility.</p> <p>The facility has developed a tailings management system (TMS) that follows the Global Integrated Standard for Tailings Management (GISTM). The tailings management system is aligned with both GISTM and Toward Sustainable Mining (TSM) Protocols.</p> <p>As noted above, the auditee has adopted the Company's corporate policy and standard related to tailings management, which has been translated into site-specific management plans. The standard is defined as a Critical Risk Management (CRM) plan "D5 Management of Tailings and Water Storage Facilities". There are several accountable executives with assigned responsibilities under the D5 standard. An accountable D5 Nominated Manager has been identified for the PKC facility (the tailings facility). The auditee has also identified a Responsible Dam Engineer.</p> <p>The auditee has developed a "concordance table" which demonstrates alignment of the facility TMS with the TSM and GISTM protocols.</p> <p>The auditee was able to demonstrate detailed site characterization of the tailings facility that includes data on climate, geomorphology, geology, geochemistry, hydrology and hydrogeology (surface and groundwater flow and quality), geotechnical, and seismicity.</p> <p>The auditee reportedly completes dam safety reviews (DSRs) every 5-7 years. Dam safety inspections (DSIs) are conducted every year. Other audits against the corporate standard (Independent Operational Review) are completed every 2 years, which includes a detailed review of the site's water balance model, which is a core component of the Operations, Maintenance and Surveillance (OMS) plan.</p> <p>The auditee has a comprehensive environmental monitoring program which includes discharge monitoring from the site's final collection pond as</p>



		<p>required by site's Water License. The auditee also conducts Aquatic Effects Monitoring to evaluate changes in ecosystem around the PKC.</p> <p>The auditee has developed and maintains, and exercises, an emergency preparedness and response plan for the processed kimberlite containment (PKC) facility and also for the A418 pit (which is now exhausted and is being backfilled for fine processed kimberlite (tailings)). The emergency preparedness and response plans are tested routinely (annually). Mock evacuations were completed most recently in December 2023 for A418. The emergency preparedness and response plans are reviewed with relevant third parties, including adjacent mines. The auditee maintains mutual aid agreements with adjacent mines. Emergency preparedness plans are based on breach analyses which includes modelling of dam break scenarios based on storm events. Scenarios have been developed for the PKC and also for the A418 pit.</p> <p>The TMS, including the OMS and the emergency preparedness and response plans, are audited regularly. The auditee is subject to a D5 Independent Operational Review every 2 years, which includes a detailed review of the OMS. An internal TSM audit is completed regularly. The auditee commissioned a third party to complete an external TSM audit using the table of Conformance (2022 version) in Jul-2024, this external audit includes evaluation of the effectiveness of implementation of the tailing management systems and testing of the ERP and EPP, while there are areas could be further improved include no ERP was provided for the surface tailings operations at A418 PKMW.</p>
4. Operation, maintenance, and surveillance	AA	<p>The auditee has developed and implemented an operation, maintenance, and surveillance (OMS) plan. The auditee's OMS was prepared in accordance with TSM Protocol Reference to Developing an Operation, Maintenance, and Surveillance Manual for Tailings and Water Management Facilities.</p> <p>The auditee's OMS is reviewed and updated regularly, based on change, and at a minimum annually. The auditee's Accountable Executive and Dam Engineer are responsible for maintaining the OMS.</p> <p>The TMS, including the OMS and the emergency preparedness and response plans, are audited regularly. The auditee is subject to a D5 Independent Operational Review every 2 years, which includes a detailed review of the OMS. An internal TSM audit is completed regularly. The auditee commissioned a third party to complete an external TSM audit using the table of Conformance (2022 version) in Jul-2024, this external audit</p>



		includes evaluation of the effectiveness of the development and implementation of the OMS manual. However, there are areas can be further improved include OMS do not capture the closure works for PKC, insufficient guidance related to tailings deposition.
5. Annual Tailings Management Review	AAA	<p>The auditee reportedly completes dam safety reviews (DSRs) every 5-7 years. Dam safety inspections (DSIs) are conducted every year. Other audits against the corporate standard (Independent Operational Review) are completed every 2 years, which includes a detailed review of the auditee’s Operation, maintenance, and surveillance (OMS).</p> <p>The Accountable Executive Officer (Site Director) reviews tailings annually, through discussions / presentations with the Responsible Tailings Facility Engineer – after meeting with the Engineer of Record (EOR) and reviewing the yearly / annual Dam Safety Inspections conducted by the EOR.</p> <p>The TMS, including the OMS and the emergency preparedness and response plans, are audited regularly. The auditee is subject to a D5 Independent Operational Review every 2 years, which includes a detailed review of the OMS. An internal TSM audit is completed regularly.</p> <p>The auditee commissioned a third party to complete an external TSM audit using the table of Conformance (2022 version) in Jul-2024, this external audit includes evaluation of the effectiveness of annual tailings management reviews.</p>
Water stewardship		
1. Water Governance	A	<p>The auditee’s health, safety, environment and community (HSEC) Policy is signed by the Site Director. The policy speaks to environmental protection and regulatory compliance generally, but there is no explicit reference to water stewardship. On the other hand, reporting to stakeholders (public reporting) is heavily focused on water and compliance with the Facility’s Water License, and demonstrates a deep commitment to water stewardship.</p> <p>It was evident from document review, interviews and site observations that water is the most important environmental resource associated with the project. The auditee has invested heavily in water stewardship. The auditee has applied strong and transparent water governance, through policies, procedures and regular engagement with affected communities. The auditee’s Water License through the Wek’ èezhì Land and Water Board (WLWB) prescribes most of the “water” related requirements that apply to the site.</p> <p>To manage these requirements, the site has adopted the Company’s environmental standards that apply to site operations, including: standard</p>

		<p>E11 – Water quality protection and water management.</p> <p>Roles, responsibilities and accountabilities for operational water management and watershed-scale planning are defined. The auditee’s Water Management Plan describes roles, responsibilities and accountabilities for water management at the site.</p> <p>The auditee has a long list of COIs and has regular engagement with stakeholders. The auditee regularly and routinely engages with COIs on performance against the requirements of the site’s principal environmental license (the Water License). The Environmental Monitoring Advisory Board (EMAB) created through the environmental assessment process to oversee environmental performance is made up of external advisors/consultants and 5 Indigenous communities with whom the auditee has participation agreements.</p> <p>It is apparent that the assessment of water risks and opportunities is integrated into annual business planning and /or budgeting processes.</p> <p><u>There was no evidence to suggest that an internal audit of compliance with the TSM Water Stewardship Protocol has been completed. The auditee has not yet completed but has scheduled an external TSM audit to be conducted by a third party to review facility conformance with the TSM Water Stewardship Protocol.</u></p>
2. Operational Water Management	A	<p>The auditee has developed a Facility-specific Water Management Plan, based on the Rio Tinto standard E11: Water quality protection and water management. It was apparent from document review and interviews that the identification and assessment of facility-level risks related to surface water and groundwater have been conducted, and that processes to monitor the facility’s water performance have been established. Records of facility-level water quality and water quantity data are maintained as required.</p> <p>The site’s water balance is updated as part of the site’s Closure Plan, and considers at the impact on lake levels, the Coppermine River, and downstream users. The site’s water balance model, which is a core component of the auditee’s Operation, Maintenance and Surveillance (OMS) Manual, is updated annually by the environmental group. The site water balance model is reviewed by the Engineer of Record (EOR) which for the auditee is the consulting firm WSP. The site water balance model was most recently updated on March 31, 2023.</p> <p>The auditee’s Water Management Plan describes water management at the site. Water</p>




		<p>management and monitoring are heavily prescribed by the Facility's Water License. Collection ponds that ring around site collect contact water, which is treated and then discharged. Collection ponds are reportedly oversized and able to accommodate freshet and a 100-year storm (from critical and non-critical infrastructure). The auditee conducts discharge monitoring and environmental effects (receiving environment) monitoring. The auditee maintains separate Management Plans for wastewater treatment, discharge / effluent and also for aquatic effects monitoring. Trigger Action Response Plans (TARPs) are incorporated into aquatic effects monitoring plans (AMP) and other environmental effects monitoring plans. The site's Water License is very prescriptive in terms of sampling, monitoring and reporting. The auditee will assess data from AMP program for trends. The auditee's Water license prescribes monitoring through a Surveillance Network Program (SNP).</p> <p>Monitoring data are stored and trends are analyzed on a pre-defined frequency to inform continual improvement and/or decision-making processes.</p> <p>On-site training is provided to workers and contractors, induction training is approximately 8 hours long, covering environment, land disturbance, roles and responsibilities, Indigenous knowledge, waste management and water stewardship, induction is repeated for all staff every 3 years.</p> <p>Long-term water management considerations are incorporated into current water management decision-making processes and closure plans. The mine site is in the process of closing. It was reported that mining activities will conclude in or about 2026. The auditee has a goal of returning the lands (and waters) to a self-sustaining ecosystem. Final reclamation will return the site to as close to natural conditions as possible, a safe and stable landscape that will require limited involvement and passive management. The auditee's Closure and Abandonment Plan (1999) has evolved into a Final Closure and Reclamation Plan that has been submitted to the regulator and is currently going through public review.</p> <p><u>There was no evidence to suggest that an internal audit of compliance with the TSM Water Stewardship Protocol has been completed. The auditee has not yet completed but has scheduled an external TSM audit to be conducted by a third party to review facility conformance with the TSM Water Stewardship Protocol.</u></p>
3. Watershed-scale Planning	AAA	The Environmental Monitoring Advisory Board (EMAB) created through the environmental assessment process oversees ongoing environmental performance, including water

		<p>stewardship. Through the EMAB, the auditee works with local Indigenous communities to promote responsible and sustainable water use at a water catchment level.</p> <p>The site's water balance is updated as part of the site's Closure Plan, and considers at the impact on lake levels, the Coppermine River, and downstream users. Watershed boundaries have been defined to facilitate this review.</p> <p>The auditee has incorporated Traditional Knowledge (TK) into its Aquatic effects Monitoring Plan (AMP). The auditee regularly hosts a TK "camp" which includes water testing and fish testing, with elders teaching youth about TK.</p> <p>The Community Social Performance (CSP) team conducts panels annually with the 5 communities under Participation Agreements, to review concerns and issues. The CSP team has reported that water related risks are always on the agenda for these meetings.</p> <p>The auditee has not established a "watershed plan" per se, and there is no setting or tracking of watershed level goals. However, it is apparent that watershed level impacts and risks are being reviewed as part of the site's Closure Planning. Watershed level risks are reviewed regularly as part of the site's operational performance monitoring, and reporting through the EMAB. Aquatic effects monitoring will be long term and will continue to assess long term health of Lac de Gras, out to at least 2049.</p>
4. Water Reporting and Performance	AAA	<p>Reports on the results of monitoring are submitted to the regulators (including the Water Board, the Lands Inspector and the EMAB). All the COIs are able to access information on the auditee's water performance through the EMAB, and/or public reports required under the Water License. In addition, information / disclosures on water stewardship and site level performance are available on the Rio Tinto website under "Sustainability" in the Sustainability Fact Book. https://www.riotinto.com/Operations/canada/diavik https://www.riotinto.com/en/sustainability/environment/water</p> <p>The auditee has established objectives and targets that are specific to water stewardship. Progress of actions to achieve objectives and targets is tracked and reported to facility-level senior management. Reporting on water includes performance relative to established objectives or targets, mostly defined through the Water License and reported to the EMAB. The EMAB and other COIs have established a process for the independent verification of the accuracy of the auditee's water performance reporting. Consultants conduct third party reviews</p>

		of the auditee's annual performance reports.
Equitable, Diverse and Inclusive workplaces		
1. Leadership and Strategy	A	<p>The Diversity Policy, publicly available on the company website, underscores the commitment to diversity and equality, including gender.</p> <p>Management interviews acknowledge the limited implementation of gender equality programs but express optimism about achieving more tangible results in the future due to ongoing initiatives.</p> <p>Stakeholder interviews affirm that all positions are open to both men and women, with selection based on qualifications. However, local cultural preferences may influence fewer women applying for physically demanding operational roles.</p>
2. Advancing equity, diversity, and inclusion	A	<p>Site observations indicate a low representation of women at the operational level, but initiatives focused on gender improvement are evident.</p> <p>Employee roster data reveals that the majority of women are occupying management and supervisory positions rather than operational roles. While this highlights progress in gender representation in leadership roles, it also emphasizes the importance of promoting diversity across all levels of the organization to ensure inclusivity and equal opportunities.</p> <p>The Sustainability Fact Book 2023, accessible on the company website, includes public disclosure on gender equality figures. This transparent reporting on gender equality metrics underscores the organization's commitment to accountability and transparency in advancing equity, diversity, and inclusion within the workplace.</p>
3. Monitoring, performance, and reporting	B	<p>Workers in the sample confirm that the hiring process is open to both men and women, though there is currently a limited number of women working at the operational level.</p> <p>The Risk Management Policy at the site level incorporates aspects related to human rights and supply chain, demonstrating a commitment to integrating equity considerations into risk management processes and ensuring that diverse perspectives are accounted for in risk assessment and mitigation strategies.</p> <p>The existence of quarterly reviews to discuss risks and mitigations indicates a structured approach to monitoring risk factors and implementing corrective actions where necessary. <u>However, human rights issues are not yet fully integrated into risk management.</u></p>

4. Statement of Verification

Statement of Verification

The external verification was conducted in accordance with the Terms of Reference for Verifiers 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.
Limitations	None
Additional comments	None
Name of lead verifier	Josue Ruiz
Date of statement of verification	June 11, 2024
Signature of lead verifier	

**Contact RCS Global Group
for more information:**

contact@rcsglobal.com

All written content, graphics and photography in this document have been produced and are owned by RCS Global Ltd 2022.

All rights reserved.