

Tata Steel Minerals Canada (TSMC) / Towards Sustainable Mining (TSM) Initiative

TSMC Action Plan to achieve Level A scores in all TSM Protocols and the respective indicators

April 2025



Background and Scope:

Tata Steel Minerals Canada (TSMC), as a member of the Mining Association of Canada (MAC) and the Quebec Mining Association (AMQ), must align and maintain its operational functions in meeting with the Towards Sustainable Mining (TSM) standards. TSMC conducted its initial TSM internal audits in 2021 and 2022 and underwent the mandatory 3rd party verification for the 2023 TSM audit (conducted in January 2024).

All MAC and AMQ member companies must demonstrate a workplan and timeline towards Level A scores across all the TSM protocols and respective indicators. Using the verified scores from TSMC's 2023 TSM audit and the general guidance from MAC and AMQ for all association members to achieve Level A scores, a comprehensive assessment was carried out by TSMC for all functional areas relevant to the TSM protocols. This assessment outlines these high-level tasks and associated timelines planned by TSMC to ensure these changes are implemented, adopted and standardized effectively. TSMC has initiated the progression of works and activities towards meeting these objectives.

#	TSM Protocol	Functional Area	Requirements Not Met for Level A Score
1	Biodiversity Conservation Management	Environment	
2	Water Stewardship	Environment	
3	Climate Change	Environment	
4	Indigenous and Community Relationships	Community Relations	
5	Safe, Healthy and Respectful Workplaces	Health & Safety	
6	Equitable, Diverse and Inclusive Workplaces	Human Relations	
7	Crisis Management and Communications Planning – Corporate	Human Relations	
8	Tailings Management	Operations/Processing	

#	TSM Protocol	Functional Area	Requirements Met for Level A Score
9	Crisis Management and Communications Planning – Facility	Health & Safety	
10	Prevention of Child Labor and Forced Labor	Human Relations	

1. Biodiversity Conservation Management Protocol

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Commitment, Accountability and Communications	AA	-	Level A requirements met.	Plan to exceed current score.	-
Biodiversity Conservation Planning and Implementation	B	A	<ul style="list-style-type: none"> Comprehensive biodiversity plan Plan based on assessments Integration into business planning 	<ol style="list-style-type: none"> Enhance existing protection plan Conduct biodiversity assessment Develop objectives and targets Create formal management plan Integrate into operations Establish monitoring program 	31 March 2026
Biodiversity Conservation Reporting	C	B	<ul style="list-style-type: none"> Begin biodiversity reporting Track initiatives Develop internal reporting 	<ol style="list-style-type: none"> Develop reporting template Collect initiative data Establish quarterly reports Create tracking system 	31 March 2026
		A	<ul style="list-style-type: none"> Public reporting Report on progress vs objectives Include achievements and challenges 	<ol style="list-style-type: none"> Create annual public report Develop progress tracking Implement data validation Include in sustainability reporting Establish feedback process 	31 December 2026

2. Water Stewardship Protocol

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Water Governance	A	-	Level A requirements met.	Plan to exceed current score.	-
Effective COI Engagement and Dialogue	B	A	<ul style="list-style-type: none"> Comprehensive water system Integration into business planning Clear objectives and targets 	<ol style="list-style-type: none"> Enhance existing management plan Develop efficiency initiatives Implement risk assessments Establish performance monitoring Create standard procedures Integrate into operational decisions 	31 March 2026
Effective Indigenous Engagement and Dialogue	AA	-	Level A requirements met.	Plan to exceed current score.	-
Reporting	B	A	<ul style="list-style-type: none"> Comprehensive reporting systems Performance vs objectives reporting Continuous improvement processes 	<ol style="list-style-type: none"> Develop performance dashboard Establish operational targets Implement regular reviews Create public reporting system Develop improvement processes Establish water stewardship team 	31 March 2026

3. Climate Change Protocol – Indicator 1

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Corporate Climate Change Management	C	B	<ul style="list-style-type: none"> Develop climate change policy Establish governance structure Identify climate-related physical and transition risks Begin strategy development Demonstrate board-level accountability 	<ol style="list-style-type: none"> Develop a comprehensive climate change policy that addresses both physical and transition risks Establish a formal climate change governance structure with clear reporting lines Appoint a senior executive responsible for climate change Conduct an initial climate risk assessment to identify key physical and transition risks Develop a preliminary climate change strategy Create a board-level reporting mechanism for climate issues Document the process for climate risk identification Begin collecting GHG emission inventory data (Scope 1 and 2) 	31 March 2026
		A	<ul style="list-style-type: none"> Integrate climate change into business strategy Implement systems to manage climate-related risks Conduct scenario analysis Develop targets aligned with international commitments Demonstrate senior management involvement Align disclosure with recognized frameworks 	<ol style="list-style-type: none"> Integrate climate considerations into strategic planning processes Develop a formal climate risk management system Conduct climate scenario analysis aligned with TCFD recommendations Develop science-based GHG reduction targets Implement a system to track climate performance against targets Expand GHG inventory to include Scope 3 emissions Establish climate-related performance metrics for senior management Align climate disclosures with frameworks like TCFD, CDP, or GRI Document how climate considerations inform business decisions 	31 December 2026

3. Climate Change Protocol – Indicator 2

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Facility Climate Change Management	C	B	<ul style="list-style-type: none"> Implement facility-level climate governance Identify facility-specific climate risks Begin emissions inventory development Establish energy management systems Document key risk management activities 	<ol style="list-style-type: none"> Establish a facility-level climate committee with clear mandate Appoint a facility climate coordinator responsible for implementation Conduct facility-specific climate risk assessment including: <ul style="list-style-type: none"> Physical risks (extreme weather, water availability, etc.) Transition risks (regulatory, technology, market changes) Impact on operations, infrastructure, and supply chain Develop facility-level GHG emissions inventory Implement an energy management system to track consumption Map climate-sensitive infrastructure and processes Identify preliminary risk mitigation measures Document existing adaptation and mitigation activities 	31 March 2026
		A	<ul style="list-style-type: none"> Integrate climate change into business strategy Implement systems to manage climate-related risks Conduct scenario analysis Develop targets aligned with international commitments Demonstrate senior management involvement Align disclosure with recognized frameworks 	<ol style="list-style-type: none"> Integrate climate considerations into strategic planning processes Develop a formal climate risk management system Conduct climate scenario analysis aligned with TCFD recommendations Develop science-based GHG reduction targets Implement a system to track climate performance against targets Expand GHG inventory to include Scope 3 emissions Establish climate-related performance metrics for senior management Align climate disclosures with frameworks like TCFD, CDP, or GRI Document how climate considerations inform business decisions 	31 December 2026

3. Climate Change Protocol – Indicator 3

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Facility Performance Targets and Reporting	C	B	<ul style="list-style-type: none"> Establish facility-level emissions baseline Set preliminary performance targets Implement monitoring systems Begin reporting on climate performance Document emissions calculation methodology 	<ol style="list-style-type: none"> Establish comprehensive GHG emissions baseline for the facility Document the emissions calculation methodology following recognized protocols (GHG Protocol, ISO 14064) Set preliminary GHG reduction and energy efficiency targets Implement systems to monitor and track emissions and energy use Establish data quality control procedures Begin regular internal reporting on climate performance Identify major emissions sources and reduction opportunities Develop a template for standardized climate reporting Document verification processes for emissions data 	31 March 2026
		A	<ul style="list-style-type: none"> Set science-based reduction targets Implement comprehensive monitoring Establish public reporting Demonstrate progress against targets Document verification of performance data Connect performance to business metrics 	<ol style="list-style-type: none"> Integrate climate considerations into strategic planning processes Develop a formal climate risk management system Conduct climate scenario analysis aligned with TCFD recommendations Develop science-based GHG reduction targets Implement a system to track climate performance against targets Expand GHG inventory to include Scope 3 emissions Establish climate-related performance metrics for senior management Align climate disclosures with frameworks like TCFD, CDP, or GRI Document how climate considerations inform business decisions 	31 December 2026

4. Indigenous and Community Relationships Protocol

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Community of Interest (COI) Identification	B	A	<ul style="list-style-type: none"> Formal, documented COI identification process Regular review process Documented prioritization method 	<ol style="list-style-type: none"> Develop formal COI mapping document Establish quarterly reviews Create prioritization matrix Document identification methodology 	31 March 2026
Effective COI Engagement and Dialogue	AAA	-	Level A requirements met.	Maintain highest level score.	-
Effective Indigenous Engagement and Dialogue	AAA	-	Level A requirements met.	Maintain highest level score.	-
Reporting	B	A	<ul style="list-style-type: none"> Formal public reporting on engagement Reports include responses to feedback Publication of material issues raised 	<ol style="list-style-type: none"> Develop reporting template Create annual community relations report Establish disclosure approval process 	31 March 2026
COI Response Mechanism	AA	-	Level A requirements met.	Plan to exceed current score.	-

5. Safe, Healthy and Respectful Workplaces Protocol

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Commitment and Accountability	A	-	Level A requirements met.	Plan to exceed current score.	-
Safety and Health Management Systems	A	-	Level A requirements met.	Plan to exceed current score.	-
Psychological Safety and Respectful Behaviour	A	-	Level A requirements met.	Plan to exceed current score.	-
Training, Behaviour and Culture	A	-	Level A requirements met.	Plan to exceed current score.	-
Monitoring and Reporting	B	A	<ul style="list-style-type: none"> Comprehensive audit program Regular monitoring of all aspects Trend analysis processes 	<ol style="list-style-type: none"> Develop ISO-based audit schedule Implement regular inspections Create tracking dashboard Establish analysis process Train internal auditors 	31 Dec 2026
Physical Safety and Health Performance	B	A	<ul style="list-style-type: none"> Consistent meeting of safety targets Leading indicators established Performance monitoring systems 	<ol style="list-style-type: none"> Establish clear targets Implement leading indicators Create tracking system Establish regular reviews Develop recognition process 	31 Mar 2026

6. Equitable, Diverse and Inclusive Workplaces Protocol

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Leadership and Strategy	C	B	<ul style="list-style-type: none"> Develop formal EDI policy Secure leadership commitment Communicate policy 	<ol style="list-style-type: none"> Create comprehensive EDI policy based on Tata Steel Group policy. Secure senior leadership approval Develop communication materials Establish EDI committee 	31 Dec 2025
		A	<ul style="list-style-type: none"> Implement formal EDI strategy Establish governance structures Conduct regular management reviews 	<ol style="list-style-type: none"> Develop multi-year strategy Establish clear roles Implement quarterly reviews Create accountability framework 	31 Dec 2026
Advancing Equity, Diversity, and Inclusion	C	B	<ul style="list-style-type: none"> Implement EDI understanding processes Establish reporting mechanisms Provide EDI resources 	<ol style="list-style-type: none"> Develop EDI training Establish confidential reporting Allocate budget for initiatives Create awareness materials 	31 Dec 2025
		A	<ul style="list-style-type: none"> Define clear roles/responsibilities Identify/address inclusion barriers Establish assessment mechanisms 	<ol style="list-style-type: none"> Assign specific responsibilities Conduct barriers audit Develop action plans Implement regular assessment Create performance dashboard 	31 Dec 2026
Monitoring, Performance, and Reporting	C	B	<ul style="list-style-type: none"> Establish baseline diversity data Implement data collection Begin monitoring trends 	<ol style="list-style-type: none"> Develop data collection tools Establish demographic surveys Create tracking system Develop reporting framework 	31 Dec 2025
		A	<ul style="list-style-type: none"> Implement regular EDI reporting Establish improvement targets Develop data analysis processes 	<ol style="list-style-type: none"> Create comprehensive dashboard Establish quarterly reviews Develop specific targets Implement improvement processes Begin public reporting 	31 Dec 2026

7. Crisis Management and Communications Planning – Corporate

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Crisis Management and Communications Preparedness	No	Yes	<ul style="list-style-type: none"> • Corporate crisis management plan • Coverage of all potential scenarios • Clear roles and responsibilities 	<ol style="list-style-type: none"> 1. Develop comprehensive plan 2. Secure executive approval 3. Ensure alignment with facility plans 4. Create management resources 	31 Dec 2025
Corporate Review	No	Yes	<ul style="list-style-type: none"> • Regular review process • Incorporation of lessons learned • Documentation of reviews 	<ol style="list-style-type: none"> 1. Establish annual review schedule 2. Create process for lessons learned 3. Develop documentation system 4. Assign maintenance responsibility 	31 Dec 2025
Training	Yes	-	Already Yes	Maintain highest level score.	-

8. Tailings Management Protocol – Indicator 1

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Tailings Management Policy and Commitment	C	B	<ul style="list-style-type: none"> Develop a tailings management policy Align with MAC's Tailings Guide Demonstrate commitment to safe management Document and communicate policy 	<ol style="list-style-type: none"> Create a standalone tailings management policy that aligns with MAC's Guide to the Management of Tailings Facilities Include commitments to: Safe design, construction, operation and closure; Risk management procedures; Regular reviews and continual improvement; Compliance with regulations and standards. Have policy signed by senior management Distribute policy to all relevant employees and contractors Make policy available to stakeholders 	31 March 2026
		A	<ul style="list-style-type: none"> Demonstrate implementation of policy Show commitment at senior levels Integrate tailings management into business systems Conduct reviews of policy effectiveness 	<ol style="list-style-type: none"> Develop and implement an executive dashboard for tailings management Include tailings management as a regular agenda item in leadership meetings Document how policy principles are integrated into operational procedures Create a system to track policy implementation and effectiveness Conduct formal annual review of policy effectiveness Document decisions that demonstrate the application of policy principles 	31 March 2026

8. Tailings Management Protocol – Indicator 2

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Assigned Accountability for Tailings Management	C	B	<ul style="list-style-type: none"> Define accountability for tailings management Document roles and responsibilities Ensure resources for safe management Establish reporting relationships 	<ol style="list-style-type: none"> Clearly define and document the role of an Accountable Executive Officer for tailings management Develop a formal organizational chart showing tailings management responsibilities Create detailed job descriptions for all roles involved in tailings management Document the reporting structures and communication channels Assess resource requirements and ensure adequate staffing and budget Implement a system to track tailings management tasks and responsibilities 	31 March 2026
		A	<ul style="list-style-type: none"> Demonstrate active oversight by senior management Show integration with broader business processes Ensure responsibilities are understood and implemented Regular evaluation of resource adequacy 	<ol style="list-style-type: none"> Implement quarterly review meetings with senior management Develop key performance indicators for tailings management roles Create a competency matrix for tailings management positions Implement a formal process to evaluate resource adequacy Document how tailings management is integrated with other business processes Establish a formal mechanism for employees to provide feedback on the clarity of roles and responsibilities Conduct periodic assessment of effective implementation 	31 March 2026

8. Tailings Management Protocol – Indicator 3

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Tailings Management System and Emergency Preparedness	C	B	<ul style="list-style-type: none"> Develop a tailings management system Include risk assessment process Develop emergency preparedness plan Document critical controls Establish change management processes 	<ol style="list-style-type: none"> Develop a formal tailings management system aligned with MAC guidelines Conduct a comprehensive risk assessment of tailings facilities Identify and document critical controls for major risk scenarios Develop performance standards for critical controls Create a tailings-specific emergency response plan that includes: <ul style="list-style-type: none"> Potential failure scenarios Response procedures Communication protocols Resource requirements Establish a formal change management process Document baseline information on tailings facilities 	31 March 2026
		A	<ul style="list-style-type: none"> Demonstrate effective implementation Regular testing of emergency plans Independent review of management system Continuous improvement process Integration with overall risk management 	<ol style="list-style-type: none"> Implement monitoring systems for critical controls Conduct tabletop and field tests of emergency response plans Engage external experts to review the tailings management system Develop a formal continuous improvement process Integrate tailings management into the overall operational risk register Document how lessons learned are incorporated Implement a formal system for tracking and closing out actions Establish regular communication with potentially affected communities regarding emergency procedures 	31 March 2026

8. Tailings Management Protocol – Indicator 4

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Operation, Maintenance, and Surveillance (OMS) Manual	C	B	<ul style="list-style-type: none"> Develop a comprehensive OMS manual Align with MAC guidelines Document operating procedures Establish maintenance programs Implement surveillance activities 	<ol style="list-style-type: none"> Develop a comprehensive OMS manual following MAC's guidelines Include detailed sections on: <ul style="list-style-type: none"> Facility description and design parameters Operating procedures and controls Maintenance requirements and schedules Surveillance and monitoring procedures Performance indicators and thresholds Document inspection and testing protocols Establish data management procedures Define roles and responsibilities for OMS activities Develop training requirements for personnel 	31 March 2026
		A	<ul style="list-style-type: none"> Demonstrate effective implementation Regular updates to OMS manual Documentation of OMS activities Evidence of systematic application Integration with management system 	<ol style="list-style-type: none"> Implement systematic documentation of all OMS activities Establish a formal process for regular reviews and updates of the OMS manual Create a dashboard to track key performance indicators Implement a system to document deviations and corrective actions Conduct regular audits of OMS implementation Provide specialized training for personnel on OMS procedures Document how OMS activities inform facility management decisions Establish a process to incorporate lessons learned 	31 March 2026

8. Tailings Management Protocol – Indicator 5

Indicator	Current Score	Target	Key Requirements	Actions to Target	Target Date
Annual Tailings Management Review	C	B	<ul style="list-style-type: none"> Establish a formal review process Include performance evaluation Review adherence to management system Document findings and actions Report to senior management 	<ol style="list-style-type: none"> Develop a formal procedure for annual tailings management reviews Create a standardized review template that includes: <ul style="list-style-type: none"> Performance against objectives and indicators Status of previous action items Effectiveness of risk management controls Results of inspections and audits Changes to regulatory requirements Emerging issues and risks Establish a schedule for conducting reviews Define the composition of the review team Implement a system to track review findings and actions Develop a formal reporting process to senior management 	31 March 2026
		A	<ul style="list-style-type: none"> Demonstrate that reviews inform decision-making Include external expertise in reviews Show continuous improvement Integrate review outcomes into planning Document accountability for findings 	<ol style="list-style-type: none"> Engage external experts in the review process Document how review findings influence business decisions and planning Implement a formal tracking system for actions arising from reviews Establish clear accountability for addressing review findings Demonstrate continuous improvement based on past reviews Integrate review findings into corporate risk management processes Establish metrics to evaluate the effectiveness of the review process itself Document how lessons learned are shared across the organization 	31 March 2026