

## **TSM Verification Summary Report**

## **Facility Information**

Name of company	Vale
Name of facility	Long Harbour Operations
Address	1 Nickel Road, Long Harbour, NL A0B 2J0
Country of operation	Canada
Products/metals produced on site	Nickel rounds, cobalt rounds, copper cathodes
Types of operations included in scope:	
Mining	
Milling	
Smelting	
Hydrometallurgical	
Refining	
Other (please explain)	Hydrometallurgical facility
Types of infrastructure included in scope:	
Roads	
Rails	
Ports	
Other (please explain)	

## **Verifier and Verification Information**

Verification firm	Rubinoff Environmental Inc.
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	Yes Dianne Rubinoff of Rubinoff Environmental Inc. is a Verification Service Providers (VSP) certified by the Mining Association of Canada and meets the Terms of Reference for Verification Service Providers established by the Mining Association of Canada.
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	11/08/2025-13/08/2025
Verification period	Year prior to Verification end date



## Summary of the verification All Protocols were verified for this operation. methodology The Verification was completed in accordance with MAC's requirements for completing TSM Verifications, the Towards Sustainable Mining Verification Guide. Rubinoff Environmental conducted the assessment using standard techniques based on those outlined in ISO 19011 The Guidelines for Auditing Management Systems. Summary of the verification The activities undertaken during the verification process activities are summarized below: • Review of media scan and development of Verification Plan. Areas identified as higher risk either in the media scan or based on the Verifier's knowledge of the site were given additional verification time in the schedule. Prior to the verification, copies of the facility's selfassessments and supporting documentation were made available and were reviewed An opening meeting was held including an overview presentation made by the facility, followed by a site tour. Evidence was collected through interviews with facility and corporate personnel, review of documents and some observations. • The information collected was assessed against the criteria set out in the performance standards protocols. As per MAC guidance, the number of worker interviews were based on the square root of the number of workers on site. 34 individuals were interviewed. Interviews included formal interviews with subject matter experts as well as informal interviews with workers. Interviews with workers were scheduled to follow-up on information provided by the subject matter experts. Some of the worker interviews were conducted remotely (due to wildfire situation). All interviews were conducted in a manner that allowed the interviewees to speak confidentially and comfortably with the Verifier. A representative sample of COIs were interviewed virtually after the site visit. COI were selected by the Verifier using the stakeholder list and included municipal representatives, NGOs and nearby educational institutions. A debrief meeting was held daily and a closing meeting was held on the last day. A verification report was produced.



Was a site visited conducted?	Yes
Did the facility provide advance notice of the verification to communities of interest?	Yes
Number and types of communities of interest interviewed to support the verification	1 local government official, 1 NGO representative, 1 educational institution representative
Has the facility developed an action plan to address gaps to achieve Level A or Yes on any TSM performance indicators?	Not Applicable



## **Summary of Findings**

	Rating	
Criterion	C, B, A, AA or AAA (unless otherwise indicated)	Comments

## **Biodiversity Conservation Management**

Interviews included: VNL Environmental Superintendent, HSER Advisor

Documents Reviewed Included: Vale Sustainability Policy, Canada-EMS-Environmental Policy Statement, Vale Base Metals Standard for Closure, Environmental Protection Plan, Environmental Monitoring Plan, Environmental Advisor Job Description, Environmental Budget, Internal Audit December 2024, Community Liaison Committee (CLC) Presentations and Minutes, Vale Supplier Newsletter – Biodiversity and its Essentiality for Life and Future of the Planet, NL DEEC Real-Time Water monitoring Website, EIS Long Harbour Commercial Nickel Processing Plant Full Report 2008, Significant Environmental Aspects Registry: Natural Ecosystems and Closure, Rehabilitation and Closure Plan, Vale NL Long Harbour Operations 2024 Terrestrial/Freshwater Effects Monitoring Program Feb 2025, Environmental Effects Monitoring for Epiphytic Lichens 2014, 2024 Water Use Reports, Certificate of Approval Vale NL Long Harbour Processing Plant Dec 2023, Vale Integrated Report 2024 and ESG Databook

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Corporate biodiversity conservation commitment, accountability, and communications	AAA	The Vale Sustainability policy includes a commitment to biodiversity. The policy is supported by the Canadian EMS Environmental Policy Statement and the Closure Standard. The commitments in these documents and programs in place are consistent with MAC Biodiversity Framework. An Environmental Protection Plan (EPP) and Environmental Monitoring Plan (EMP) have been prepared. Commitment has been communicated to employees and COI. Responsibilities and resources have been assigned. An internal audit on biodiversity was conducted in 2024. Vale's commitment includes a stated ambition of no net loss. Vale actively partners with other organizations (e.g., NL DECC for air and water monitoring and with local fisher on projects).
2. Biodiversity conservation planning and implementation	AAA	Long Harbour Operations developed baseline data as part of its Environmental Impact Study. The EPP, EMP and the Rehabilitation and Closure Plan outline the components of a biodiversity conservation plan. Global and site-specific biodiversity objectives exist related to reduction of impacted land. Responsibilities are assigned. Communities of Interest are engaged through the Community Liaison Committee. Budgeting takes place. An internal EMS audit included natural ecosystems and closure planning was



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		conducted in 2024. During the HADD process, Vale presented papers contributing to greater understanding for the protection of biodiversity. Vale supported a beach cleanup in 2024 and community cleanup in 2025.
3. Biodiversity conservation reporting	AAA	Biodiversity is included in Senior Leadership monthly performance meetings and the weekly coordination meetings as appropriate. Biodiversity is included in the Vale Integrated Report and data is externally. Real time water quality data is available to the public and is independently verified by NL DECC. Feedback on biodiversity reporting is sought at the CLC.  Vale Integrated Report 0c82cdc2-0eee-aa5f-1777-cddc02bd917d



	Rating	
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Climate Change		
Interviews included: VNL Environmental Superintendent, Production Area Superintendent and Chief Power Engineer, Processing Plant Technician and Power Engineer		
Documents Reviewed Included: Sustainability Policy, Canada-EMS-Environmental Policy Statement, Vale Integrated Report 2024 and ESG Databook, NL GHG Reporting Form Long Harbour 2024, Management Review 2025, Community Liaison Committee presentations and minutes, Long Harbour Operations GHG Procedures Manual, VBM Climate Vulnerability and Risk Assessment Long Harbour 2025 project overview, NL Carbon Tax Worksheet, Environmental Advisor Job Description, Senior Technologist Job Description, Surface Plants, Mining and Maintenance Supervisor Job Description, Boiler GHG Emissions Reduction Study Report, Environmental Awareness for All training course, EMS Internal Audit May 2025, RY2023 ISO-14064 Third Party Verification Report for LHPP October 2024		

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Corporate climate change management	A	Data on Scope 1 and Scope 2 emissions are maintained. There is a demonstrated corporate climate change strategy documented in the Vale Integrated Report. Vale has a Chief Sustainability and Corporate Affairs Officer and a Board Sustainability Committee. Material climate-related risks are identified in the Vale Integrated Report.
2. Facility climate change management	A	The Sustainability Policy commits to demonstrating leadership in low carbon mining. Significant sources of energy and non-energy sources are identified and data is collected and monitored. The facility has conduced some analysis of climate change impacts and adaptation measures. Job descriptions show clear roles and responsibilities. Operators demonstrated awareness of parameters influencing energy performance. A climate vulnerability and risk assessments has been completed. The energy and GHG emissions management system has undergone an internal audit as part of the ISO 14001 Environmental Management System. KPIs related to energy use and GHG emissions are assigned.



Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Comments
3. Facility performance targets and reporting	AA	Vale has set corporate targets for GHG reductions (33% by 2030) and for zero-net GHG emissions by 2050. The NL government also has set GHG intensity targets for the site. The facility has demonstrated progress towards the performance targets. There are short-term and long-terms actions developed. There is annual public reporting in the Vale Integrated Report. Information on the facility's assessment of potential physical climate impacts and plans or actions to manage the associated risks has been shared publicly at the CLC.



# Criterion C, B, A, AA or AAA (unless otherwise indicated) C, B, A, AA or AAA or AAA (unless otherwise indicated)

## **Crisis Management and Communications Planning – Facility (Indicate YES or NO)**

Interviews included: HSR Superintendent, Operation Risk Lead

Documents Reviewed Included: Hazard Identification & Risk Analysis Vale Long Harbour Report, Material Unwanted Events bowties, Emergency Response Plan Long Harbour, LHO Crisis Management Plan, EMQnet BST members, Vale Base Metals Crisis Management Severity Matrix EMQnet Profile Packs, EMQnet test alerts, Stakeholder contact list for Long Harbour, Everbridge employee alerts, Training Status Report, Full-scale Crisis Management Drill June 2025 Leak of H2S After Action Report, RSA High Level Tabletop After Action Report November 2024

Crisis Management and     Communications Preparedness	YES	The Long Harbour Emergency Response Plan identifies credible threats and plans exist to respond. An assessment of Material Unwanted Events also identified threats. EMQnet is used to manage the crisis plan including roles and responsibilities. A stakeholder list identifies key stakeholders. A media list is available. EMQnet is used to alert the Crisis Team. Everbridge is used to communicate with employees. A crisis room has been set up.
2. Review	YES	EMQnet acts as a document control system for crisis documents. The facility's plans are shared with corporate through EMQnet. The Crisis Management Plan is reviewed and updated as required and at least every two years. The stakeholder contact information is reviewed at least every two years. The notification system is tested at least twice a year. Records indicate team members were familiarized with the plan.
3. Training	YES	A tabletop drill was conducted in November 2024 involving high levels at the RSA. A full crisis simulation drill (H2S Leak) was conducted in June 2025.



	Rating	
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## **Indigenous and Community Relationships**

Interviews included: Communications Advisor, Community Liaison Committee members, local government official, NGO representative, educational institution representative

Documents Reviewed Included: Vale's Social Performance Policy, Listening and Response Mechanism, Vale SDI (Stakeholders Demands and Issues) System, Vale Newfoundland and Labrador Stakeholder Map, EIS Volume 3 Socio-Economic Environment, Long Harbour Community Liaison Committee (CLC) Terms of Reference, Communities – Assessment and Risk Register, Industrial and Employment Benefits Report April 2022, Energy Ministers Mining Conference tour social media post July 2022, Female Recruitment Campaign posters, Women's Employment Plan, Community Concerns database, Indigenous Foundations training module, Journey Together Long Harbour and Voisey's Bay Report 2023-2024, CLC presentation for June 10 2025 meeting, CLC Minutes March 25 2025, Long Harbour Open House Posters, Long Harbour Open House feedback comments, Indigenous Peoples and Traditional Community section on Vale.com website, Photos of Red Dresses hanging at LHO for Missing and Murdered Indigenous Women and Girls Red Dress Day, Vale.com Application for Community Funding, Community Investment Criteria, Pictures of Beach cleanup 2024, Closure Plan

Community of Interest (COI)     Identification	AAA	Communities of Interest are identified and documented on the Stakeholder List. There is a documented process in place for COI identification and is described in corporate documents. COI were identified in the Environmental Impact Statement process. Open Houses and Community Liaison Committee (CLC) polling to identify other groups that could be considered COI.
2. Effective COI Engagement and Dialogue	AAA	The facility provides assistance to ensure COI are able to participate. The facility makes the CLC meetings at a time/location to ensure COI are able to participate. A formal process for engagement is provided in the Terms of Reference for the Community Liaison Committee (CLC) which were collaboratively developed. Accountability has been established. Facility has a consistent history of meaningful engagement with COI. Through the CLC, Vale is engaged in joint decision making on matters that affect the COI.
3. Effective Indigenous Engagement and Dialogue	AAA	There is demonstrated senior management commitment to Indigenous engagement on the Vale website. All Canadian personnel have access to the Indigenous Foundations training module. Facility-wide education and awareness on Indigenous topics occurs.



	Rating	
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		Long Harbour Processing Plant's (LHPP) Canadian Environmental Assessment Act Screening Report (accepted by the Impact Assessment Agency of Canada in 2008) did not identify Indigenous groups in the area of influence of LHPP. The Screening Report identified no impacts to Indigenous treaty rights, known Indigenous interests, or current use of lands and resources for traditional purposes near the LHPP.
4. Community Impact and Benefit Management	AAA	Vale's Sustainability Policy commits to contributing to local development. Social impacts are identified and controlled through BWise Mitigation Controls. Vale contributes to a number of organizations to benefit a broad spectrum of the community. Contributions are discussed in the CLC. Benefits include consideration of procurement and employment. These contributions are noted in the community report and benefit a broad spectrum of the community and can be self-sustaining.
5. COI Response Mechanism	AAA	A Long Harbour Community Concerns line and email concerns line is in place. Concerns are also raised through the CLC and meetings with the Long Harbour Town Council. Concerns from the Concerns Line and from email/phone calls are documented and followed up and tracked. The facility responded in a timely and appropriate manner to a concern raised about traffic at a stop sign. Reports are provided monthly to the Base Metals Executive Committee. Questions raised at the CLC are documented and responded to in the minutes. COI are proactively informed on how to access the response mechanism



## Criterion Criterion C, B, A, AA or AAA (unless otherwise indicated) Comments

## Preventing of Child and Forced Labour (Indicate YES or NO)

Interviews included: Talent Acquisition Manager, Corporate Sustainability Analyst

Documents Reviewed Included: Human Rights Policy, Principles of Conduct for Third Parties, Copper Mark – Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc, Vale Base Metals Standard for Responsible Sourcing of Minerals, Responsible Sourcing Policy Statement for Vale Canada Limited

Preventing Forced Labour	YES	Vale's Human Rights Policy states, "Vale prohibits the use of any kind of employment practice that may be interpreted as equivalent to forced or modern slavery labour", and "Vale requires through contractual clauses, that its suppliers prohibit any type of employment practice that may be interpreted as equivalent to forced or modern slavery."
		Vale's Principles of Conduct for Third Parties states that Vale expects third parties to be familiar with Vale's Human Rights Policy and adopt standards in line, including the prohibition of modern slavery and forced labour.
		Vale Base Metals' Standard for Responsible Sourcing on Minerals requires an assessment of risk related for forced labour and the Responsible Sourcing Policy Statement for Vale Canada indicates forced labour will not be tolerated.
		Vale is registered to Copper Mark and supply chain related to forced labour has been audited.
2. Preventing Child Labour	YES	Federal regulation prohibits children under the age of 17 from working in an underground mine. Various Provincial regulations (including Ontario, Manitoba and Newfoundland & Labrador) prohibit children under the age of 18 from working in an underground mine.



Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Comments
		Vale's Human Rights Policy states, "Vale prohibits the use child labour", and "Vale requires through contractual clauses, that its suppliers prohibit the use of slave labour."
		Vale's Principles of Conduct for Third Parties states that Vale expects third parties to be familiar with Vale's Human Rights Policy and adopt standards in line, including the prohibition of child labour.
		Vale Base Metals' Standard for Responsible Sourcing on Minerals requires an assessment of risk related for child labour and the Responsible Sourcing Policy Statement for Vale Canada indicates child labour will not be tolerated.  Vale is registered to Copper Mark and supply chain related to child labour has been audited



	Rating	
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Safety and Health		

Interviews included: HSR Superintendent, Advisor Industrial Hygienist, Learning & Development (L&D) Superintendent, L&D Supervisor

Documents Reviewed Included: Sustainability Policy, HSE Critical Activities Requirements, Golden Rules. VPS Management Model Manual, LHO Visitor Orientation, Long Harbour General Orientation. Common Core Training, HSR Superintendent Job Description, HS Advisor Job Description, OHSMS Summary Report March 2025, Occupational Health Management procedure, Occupational Health Monitoring procedure, Memo Occupational Exposure Monitoring Report, Occupational Exposure Monitoring Annual Report 2024 Electrowinning, CIH Certificate for Occupational Hygienist, Critical Control Verification records, Long Harbour Leadership Coordination Meeting HSER Update, HSR Bulletin February 2025 High Winds Protocol, HSR Bulletin March 2025 HSER Monthly Update, MOC and Risk Assessment for Warehouse Cylinder Storage Area Feb 2025, Operator Work Instructions, LHO Standard - Permit to Work, HomeSafe Orientation Presentation, SafeProduction training -Hazard Identification and Risk Management, Workplace Inspection Report, Job Hazard Analysis (JHA) Excavate Ground for Jersey Barrier Placement, JHA Installation of Structural for Temporary Bridge Support, Job Safety Observation (JSO) Carbon Addition, JSO Neutralization Skid – Flocculent Preparation and Storage, Long Harbour Daily Event Summary, Hand Safety Campaign August 2024. Material Unwanted Events (MUEs) bowties - Leaching, Refinery, Services, Ground Stability and CRM verification, Leadership in Field (LIF) Critical Risk Management (CRM) Supervisor Training, VES Vale Education System, Vale Zero Harm notice: Green Room, Defeat Depression Walk email, HR Bulletin New EFAP Program 2024, Mines for Minds training module, Base Metals North America HSR Report 2024 Target Status (LIF, CRM), Long Harbour HSR Tactical Plan, HomeSafe Huddle May 2025, CIMM Benchmarking

1. Commitments and Accountability	AA	The Sustainability Policy defines the commitments. The commitments are consistent with the MAC Safety and Health Framework. The Policy has been communicated to visitors, employees and contractors. The Superintendent of HSR is accountable for safety and health at the site. An internal OHSMS audit was conducted in March 2025.
2. Planning and Implementation	AA	A formal Safety and Health Management System (Vale VPS) is in place including documented safety standards and procedures, objectives, risk assessments, workplace inspections, defined roles and responsibilities, and maintenance of records. Critical controls have been identified and verified. The facility is working towards ISO 45001 certification. The industrial hygiene program is overseen by a qualified hygienist. An internal OHSMS audit was conducted in March 2025.



	Rating	
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3. Training, Behaviour and Culture	AAA	A robust training system is in place. Senior leadership demonstrates a commitment and a safety-based culture is encouraged. Trainees are assessed for competency and trainers are qualified and evaluated for effectiveness. The facility promotes health and wellness with programs to support work mental health. The commitment to safety and health is visibly embedded and management demonstrated the commitment through one-on-one interactions.
4. Monitoring and Reporting	AA	Safety and Health metrics are monitored and reported including leading and lagging indicators. Leadership regularly reviews performance. Safety and Health data is publicly reported in the Vale Integrated Report. An internal OHSMS audit was conducted in March 2025. Critical controls are verified with thresholds implemented.
		Vale Integrated Report <u>0c82cdc2-0eee-aa5f-1777-cddc02bd917d</u>
5. Performance	AA	Targets are set for leading and lagging indicators and performance is regularly reviewed and communicated. Facility benchmarks its performance against its peers.



	Rating	
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## **Tailings Management**

Interviews included: Responsible Tailings Facility Engineer

Documents Reviewed Included: Tailings Management Facilities 2023 Audit MAC TSM North Atlantic Operations Dec 2023, Tailings Management Facilities 2023 Audit Part 2: Effectiveness MAC TSM North Atlantic Operations July 2024, Technical Memo: Tailings Management Facilities 2023 Audit Voisey's Bay and Long Harbour North Atlantic Operations – August 2025

Tailings management policy and commitment	AAA	An external audit of the Tailings Management Policy and Commitment confirmed the requirements of Level A had been met. An external audit evaluated the effectiveness of the policy and/or commitments and their implementation.
2. Assigned accountability for tailings management	AAA	An external audit of the Assigned Accountability and Responsibility for Tailings Management Policy and Commitment confirmed the requirements of Level A had been met. An external audit evaluated the effectiveness of the policy and/or commitments and their implementation of the accountability and responsibilities.
3. Tailings management system and emergency preparedness	AAA	An external audit of the Tailings Management System and Emergency Preparedness confirmed the requirements of Level A had been met. An external audit evaluated the effectiveness of the development and implementation of the tailings management system and the development and testing of the ERP/EPP.
4. Operation, maintenance, and surveillance (OMS) Manual	AAA	An external audit of the OMS Manual determined that the OMS manual was developed and implemented in conformance with MAC's OMS Guide. An external audit evaluated the effectiveness of the development and implementation of the OMS manual.
5. Annual tailings management review	AAA	An external audit of the Tailings Management Review confirmed the requirements of Level A had been met. An external audit evaluated the effectiveness of the annual tailings management review.



## Criterion

Rating
C, B, A, AA or
AAA (unless
otherwise
indicated)

### Comments

## **Water Stewardship**

Interviews included: VNL Environmental Superintendent

Documents Reviewed Included: Sustainability Policy, Water Resources Policy, Site Orientation — Environmental Awareness, Water Retaining Structures Analyst job description, Environmental Advisor job description, Bowtie Material Unwanted Event (MUE) — Uncontrolled Release to Environment — Effluent and critical control verification, Environmental Aspect Registry, Internal Audit December 2024, Water Stewardship External Audit December 2024, VNL Long Harbour Site Water Balance 2022, MDMER Emergency Response Plan, Emergency Response Plan, Environmental Training Matrix, Technical Memo 2020 Process Water Reduction Plan, Environmental Protection Plan, Environmental Monitoring Plan, Water Balance for Discharge Quantity, Monthly Performance Meeting — Water KPIs, Management Review May 2025, Monthly Groundwater Sampling Report Investigative Wells, NL DECC Real Time Water Quality Monitoring Site, Community Liaison Committee Presentations March 2025, November 2024, Rehabilitation and Closure Plan, EIS, Vale Integrated Report 2024 and ESG Databook

1. Water Governance	AAA	There is demonstrated senior management through the Sustainability Policy and the Water and Water Resources Policy, consistent with the MAC Water Stewardship Framework. The commitment is communicated through Environmental Awareness training. Roles and responsibilities are defined in the Management of Water and Water Resources document and in job descriptions. Risks are identified in the HIRA and the Environmental Aspects Registry and integrated into business planning and budgeting. An internal audit was conducted by Sudbury personnel in November 2024. An external audit was conducted by WSP in December 2024.
2. Operational Water Management	A	The site has identified facility-level risks related to surface water and ground water and critical controls identified and verified. A water balance was prepared. Processes are established to monitor water performance for both surface water and groundwater. Ground water is modelled. Records of water quality and quantity are maintained. Response and contingency plans have been established for water-related risks and incidents. Relevant employees and contractors have been provided with appropriate training or are hired based on their qualifications. Opportunities to improve water performance are identified. An internal audit was conducted by Thompson personnel in November 2024. The



	Rating	
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		Rehabilitation and Closure Plan include long-term water management considerations. An external audit was conducted by WSP in December 2024.
3. Watershed-scale Planning	AAA	The EIS identifies the watershed that the LHO is located in and the adjacent watersheds. LHO is the only facility located within the Rattling Brook Watershed. The EIS and the Water Baseline Sampling program assessed how the operational water management contributes to the watershed. Facility works with government regulators (COI) on collaborative monitoring.
4. Water Reporting and Performance	AAA	Vale's water performance target is documented on the Vale website. Public reporting of performance against target is included in the Vale Integrated report. The data in the Integrated Report was independently verified. The water reduction target was met in the reporting year. Realtime water data is publicly available and the MDMER results are published.
		Vale Integrated Report <u>0c82cdc2-0eee-aa5f-1777-cddc02bd917d</u> Facility meets the requirements of Level AAA.



## **Statement of Verification**

Statement of Verification		
The external verification was conducted in accordance with the <i>Terms of Reference</i> for <i>Verifiers</i> 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	Due to wildfires in Newfoundland, only one of the verification days was spent on-site. The rest of the verification was conducted in Vale's St. John's office.	
Additional comments	Vale and Long Harbour Operations demonstrated a strong commitment to the MAC TSM program.	
	Personnel were well prepared for the verification process. The self-assessments were comprehensive. Excellent, professional support was received throughout the verification.	
Name of lead verifier	Dianne Rubinoff, P.Eng.	
Date of statement of verification	22/09/2025	
Signature of lead verifier	theme S. Ruberoff	