

TSM Verification Summary Report

Facility Information

| Name of company | Vale |
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| Name of facility | Port Colborne Refinery |
| Address | 187 Davis Street Port Colborne, ON L3K 5W2 |
| Country of operation | Canada |
| Products/metals produced on site | Electrolytic Cobalt, Platinum Group Metals (PGM) concentrate, Gold Sand, Silver Sands, Bismuth Cake, Iridium Cake, Selenium Cake, Tellurium Dioxide Cake |
| Types of operations included in scope: | |
| Mining | |
| Milling | |
| Smelting | |
| Hydrometallurgical | |
| Refining | |
| Other (please explain) | |
| Types of infrastructure included in scope: | |
| Roads | |
| Rails | |
| Ports | |
| Other (please explain) | |



Verifier and Verification Information

| Verification firm | Rubinoff Environmental Inc. | |
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| 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) | 03/09/2025-04/09/2025 | |
| Verification period | Year prior to Verification end date | |
| Summary of the verification methodology | All applicable Protocols were verified for this operation. There are no tailings at this facility. | |
| | 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 activities | The activities undertaken during the verification process 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 self- assessments 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. 13 individuals were interviewed. Interviews included formal interviews with subject matter experts as well as informal interviews | |

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| | with workers. Some worker interviews were scheduled to follow-up on information provided by the subject matter experts. Some random interviews were conducted. All interviews were conducted in a manner that allowed the interviewees to speak confidentially and comfortably with the Verifier. |
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| | 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 and Indigenous communities. |
| | 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 representative of Indigenous organizations |
| Has the facility developed an action plan to address gaps to achieve Level A or Yes on any TSM performance indicators? | Facility has developed an Action Plan to address the gaps to achieve Level A for Climate Change Indicator #2 and Indicator #3 |



Summary of Findings

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

Biodiversity Conservation Management

Interviews included: Environmental Advisor, Senior Corporate Environment Specialist

Documents reviewed included: Documents reviewed included: Vale Sustainability Policy, Guidelines and Processes for Biodiversity Management, Canada-EMS-Environmental Policy Statement, Vale Base Metals Standard for Closure, Port Colborne Closure Plan, Management Review 2025, New Employee Orientation, Supervisor Induction Program, Toolbox Talk Calendar, Vale Supplier Newsletter - Biodiversity and its Essentiality for Life and Future of the Planet, Environment Manager Job Description, Environment Advisor Job Description, Environment Superintendent Job Description, Vale Community Based Risk assessment (CBRA) website (Overview, Additional Studies, Summary of CBRA Findings and Conclusions, Community Health Assessment Project (CHAP), Community-Based Action Plan), TSM Biodiversity Internal Audit Dec 2024, Annual Budget for CBRA Action Plan, EMS Awareness Training for Leadership, Environmental Aspects Registry, Port Colborne Environmental Aspects and Impacts Map, Environmental Monitoring Teams Update, Monthly Performance Review KPI, PORTS meeting, Community Garden, Port Colborne Urban Forest Initiative, Inco Port Colborne Refinery Aquatic Baseline Studies by Beak & Klohn-Crippen, December 1997, Port Colborne Community Action Plan - Report on Terrestrial Natural Environment 2024, Port Colborne Community Action Plan - Aquatic Survey Report, Ontario Stakeholders List, Port Colborne Stakeholder Map, Environmental Manual for Projects, Open House 2024 posters, Canada EMS Stakeholder Environmental Feedback procedure, Vale Integrated Report 2024 and ESG Data Book, Journey Together Report to the Community Port Colborne Refinery 2023-2024

| Corporate biodiversity conservation commitment, accountability, and communications | AAA | The Vale Sustainability policy includes a commitment to biodiversity. The Canadian EMS Environmental Policy Statement and the Closure Standard also include commitments relevant to biodiversity. The policy is supported by the Guidelines and Processes for Biodiversity Management which includes the application of the mitigation hierarchy. The commitments in these documents are consistent with MAC Biodiversity Framework. Commitment has been communicated to employees and COI. Responsibilities and resources have been assigned. An independent verification of the commitment was conducted in 2024. Vale's commitment includes a stated ambition of no net loss. Vale actively partners with other organizations. |
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| Biodiversity conservation planning and implementation | AAA | A baseline study was conducted in 2002 as part of the Community-Based Risk Assessment (CBRA). Significant biodiversity aspects have been identified including species at risk and the Carolinian forest. Additional studies (e.g., terrestrial and aquatic) have been conducted in 2024 as part |



| Criterion | Rating C, B, A, AA or AAA (unless otherwise indicated) | Comments |
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| | | of the Port Colborne Community Action Plans. Key COI have been consulted with. Global and site-specific biodiversity objectives exist related to reduction of impacted land. The status is reported monthly. Biodiversity is integrated with business process and budgeting. An independent verification of the management system implementation was conducted in 2024. The facility has made investments in research, is contributing to greater scientific understanding and has developed guidance documents as part of the CBRA. |
| 3. Biodiversity conservation reporting | AA | The facility reports on its biodiversity KPI monthly to management and to Vale corporate. This information is reported on an aggregate basis in the Vale Integrated Report. The biodiversity data in the Sustainability Report is externally verified. Biodiversity information is also included in the Report to the Community and presented at the Open House. COI feedback on reporting is sought at the at the Open House and through the Community Report feedback. Vale Integrated Report 0c82cdc2-0eee-aa5f-1777-cddc02bd917d |



| | Rating | |
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| Criterion | C, B, A, AA or AAA (unless otherwise indicated) | Comments |
| Climate Change | | |
| Interviews included: Technical Leader Decarbonization, Energy Management Lead | | |
| Documents reviewed included: 2025 Base Metals Emissions spreadsheet, Sustainability Policy, 2024 | | |

Documents reviewed included: 2025 Base Metals Emissions spreadsheet, Sustainability Policy, 2024 Vale Integrated Report and ESG Databook, Credit 360 tracking of fuels and non-energy sources, Climate Vulnerability Risk Assessment Project Kick-off Presentation, Energy Organizational Chart., Management Review April 2025, Environmental KPI Tracker, Sample 5CP Forecast, Alert and Performance emails August 2025, Management of GHG procedure Appendix 1- GHG Simplified Calculation Tool, Vale Community Report: Sudbury Operations Update 2023-2024, Action Plan to Achieve Level A on Indicator #2 and Indicator #3

| Achieve Level A on Indicator #2 and Indicator #3 | | |
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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 | В | 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. Job descriptions show clear roles and responsibilities. Operators are informed of 5CP days and have awareness of parameters influencing energy performance. A climate vulnerability and risk assessment has been completed. A climate change video has been prepared to promote awareness. Vale does not meet the criteria "The facility gauges the level of importance of climate change mitigation and adaptation in relation to relevant or affected communities of interest and engages as appropriate" as required by Level A. Other Level A criteria have been met. An action plan has been prepared to achieve |
| 3. Facility performance targets and reporting | В | Level A. Vale has set corporate targets for GHG reductions (33% by 2030) and for zero-net GHG emissions by 2050. There are also Sudbury level forecast targets. The facility has demonstrated progress towards the performance targets, achieving the forecast targets in 2024. There are short-term and long-terms actions developed. There is |



| Criterion | Rating C, B, A, AA or AAA (unless otherwise indicated) | Comments |
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| | | annual public reporting in the Vale Integrated Report. |
| | | Vale does not meet the criteria "Is Information on the facility's assessment of potential climate impacts and plans or actions to manage the associated risks shared publicly and updated as assessments or plans are updated" as required by Level A. Other Level A criteria have been met. An action plan has been prepared to achieve Level A. |



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

Crisis Management and Communications Planning (Indicate YES or NO)

Interviews included: Manager Safety, Health and Risk & Disability Management, Superintendent HSR Processing Plants, Health, Safety and Risk Analyst, Operational Risk Specialists,

Documents reviewed included: Hazard Identifications and Risk Assessment (HIRA) for Material Unwanted Events (MUEs) procedure, MUE Loss of Containment of Carbonyl and CO from Process Area Piping and Process, Copper Cliff Mine North Side Fire procedure, Base Metals Severity Matrix, Ontario Business Support Team (BST Team) membership, Ontario Crisis Management Plan and document revision/review records, Ontario Crisis Management Plan Profile Packs, Job Description Community Affairs Specialist, Sudbury Stakeholder List, Summary of Meetings/Interactions with Port Colborne Fire Department, Report for Full-scale simulation drill – SO2 release, Report for Tabletop Exercise March 2023 – Level 2 Ammonia Release at CCNR, Report for Tabletop Exercise 2024 – Garson Mine underground fire

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| Crisis Management and Communications Preparedness | YES | The Hazard Identification Risk Assessment (HIRA) identifies Material Unwanted Events (MUE) as credible threats. Emergency Plans exist to respond. EMQnet software is used to manage the crisis including Ontario Crisis Management Plan and roles and responsibilities of the Business Support Team (BST). EMQnet allows remote access; and the Maple Conference Room at the North Atlantic Operations Centre (NAOC) is designated as a crisis room. Location specific documents on EMQnet include stakeholder lists and media lists. Facility meets regularly with local emergency response authorities. |
| | | NOTE: The Business Support Team for Port Colborne is the Ontario Operations Support Team and is the same as the Sudbury Operations Team. |
| 2. Review | YES | EMQnet acts as a document control system for crisis documents. The facility's plans are shared with corporate through EMQnet. The notification system was tested. Records indicate all crisis team members are familiarized with the plan either through EMQnet modules, facilitated training or participation in an exercise. |



| | Rating | |
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| Criterion | C, B, A, AA or AAA (unless otherwise indicated) | Comments |
| 3. Training | YES | A tabletop drill was conducted in March 2023 for a Level 2 Ammonia Release at CCNR. A 2024 tabletop drill was conducted for an underground fire at Garson Mine. A full crisis simulation drill was conducted in October 2022 for an SO2 release at Port Colborne**. A full scale simulation drill for tailings is planned for Fall 2025. |



| | Rating | |
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| Criterion | C, B, A, AA or AAA (unless otherwise indicated) | Comments |
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Indigenous and Community Relationships

Interviews included: GM Indigenous and Community Relations, Indigenous Relations Specialist, Community Relations Specialist, 1 local government official, 1 representative of Indigenous organizations

Documents reviewed included: Vale's Social Performance procedure, Listening and Response Mechanism, Health, Safety, Environment, Community and Operational Event Management procedure, Vale SDI (Stakeholders Demands and Issues) System, Port Colborne Stakeholders List, Port Colborne Stakeholder Map, Indigenous Relations Specialist job description, Community Relations Specialist job description, Indigenous Foundations training, Stereotypes, Bias and Reconciliation training, Vale.com Indigenous Peoples and Traditional Communities webpage, Engineering Standards Community Relations Manual for Capital Projects procedure, Vale Concerns Line Protocol, Whistle Blower Channel & Re-education Campaign, Community Investing Criteria

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| Community of Interest (COI) Identification | AA | Communities of Interest are identified and documented on the Ontario Stakeholders List. There is a documented process in place for COI identification and is described in corporate documents. Under-represented COI, such as Mississaugas of the Credit FN (MCFN), have been identified |
| Effective COI Engagement and Dialogue | A | The facility ensures COI can participate by holding the Open House at the Farmer's Market. Reporting on engagement and dialogue takes place at monthly leadership performance meetings. There is a formal engagement process related to the Community-Based Risk Assessment (CBRA). Information on engagement, including feedback, is included in the Vale Port Colborne Community Report. |
| 3. Effective Indigenous Engagement and Dialogue | A | On the Vale website, there are stated commitment to Indigenous engagement consistent with the TSM Framework. There have been some engagement processes and dialogue with Indigenous communities. Meeting have been held related to business opportunities. In addition to the Indigenous Foundations training, the Heritage Interpreter from MCFN provided a cultural awareness training session for all workers at the facility. |



| Criterion | Rating C, B, A, AA or AAA (unless otherwise indicated) | Comments |
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| 4. Community Impact and Benefit Management | A | Vale's Sustainability Policy commits to contributing to local development. Impacts are managed through the Environmental Management System. The CBRA process identified risks and prioritized mitigation to the community. Vale contributes to several organizations to benefit a broad spectrum of the community and has created a Community Improvement Fund working with the City. These contributions are noted in the Report to the Community and in press releases. |
| 5. COI Response Mechanism | A | A Community Concerns Hotline is in place. supported by a documented Response Protocol. Concerns from the hotline are documented and followed up and tracked. Reports are provided monthly to the Leadership Performance Meeting COI are proactively informed on how to access the response mechanism |



| | Rating | |
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| 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." |
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| | | 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. |



| Criterion | Rating C, B, A, AA or AAA (unless otherwise indicated) | Comments |
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| 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. |
| | | 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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| Criterion | C, B, A, AA or AAA (unless otherwise indicated) | Comments |
| Safety and Health | | |

Safety and Health

Interviews included: Manager Safety, Health and Risk & Disability Management, Superintendent HSR Processing Plants, Health, Safety and Risk Analyst, Operational Risk Specialists, Learning and Development (L&D) Supervisor, L&D Superintendent – Mines, Occupational Health Superintendent

Documents Reviewed Included: Sustainability Policy, Ontario Operations Health and Safety Policy. Roles and Responsibilities procedure, HSR Organizational Chart, OHSMS Summary Report March 2025, Safety, Health, Environmental and Community Events Management procedure, Daily Events Summary, Supervisor Training IRIS/SAP-IM/CRM, Surface Plant (General) Supervisor Induction Program, Cobalt Hydrate Plant job procedures, Work Inspection procedure, JHSC 2025 Safety Calendar, Inspection Report Jan 2025 Admin Building, Training and Change House - Theme Electrical and Housekeeping, Zero Energy State (ZES) program and modules, Job Hazard Analysis August 2025 Replacement of CL2 Valve and Associated Equipment, Hazard Identification and Risk Assessment (HIRA) for Material Unwanted Event (MUE) Surface Fire and Explosion and critical control verifications, HIRA Summary MUE and Critical Controls Report, Quantitative Occupational Exposure Monitoring Program, Designated Substance Program, WHIMS Program, Hearing Conservation Program, Quantitative Exposure Assessment Decision Tree, PCR Cobalt Annual Occupational Health Sampling Plan, New Employee Orientation Training Itinerary, Equipment Training Syllabus, Health and Safety Budget, August 2025 Calendar for Safety Line-ups, 9 Positive Mental Health Habits, Mine for Minds, Management Review NA HSR 2024, Monthly HS Deep Dive Meeting, Weekly HSER Meeting, HSER Bulletin New Ontario Safety Plan Dashboard March 24, 2025, CIMM Benchmarking report, Vale Integrated Report and ESG Data Book, Vale Community Report: Journey Together 2023-2024

| 1. Commitments and Accountability | AA | The Sustainability Policy and the Ontario Health and Safety Policy define the policy commitments. The Policy has been communicated to employees and contractors. The Manager HSR is accountable for safety and health in Ontario and roles and responsibilities have been assigned. An internal OHSMS audit was conducted in March 2025. |
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| 2. Planning and Implementation | AA | A formal Safety and Health Management System is in place including objectives, risk assessments, critical control verification, workplace inspections, defined roles and responsibilities, 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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| Criterion | C, B, A, AA or AAA (unless otherwise indicated) | Comments |
| 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 annually. The facility promotes health and wellness with programs to support worker mental heath. 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 reviews performance weekly. Safety information is communicated to employees through toolbox talks and monthly PORTS meetings. 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. |
| 5. Performance | AA | Vale Integrated Report 0c82cdc2-0eee-aa5f-1777-cddc02bd917d Targets are set for leading and lagging indicators and performance is regularly reviewed and communicated. Targets include contactors. Facility benchmarks its performance against its peers. |



| Criterion | Rating C, B, A, AA or AAA (unless otherwise indicated) | Comments |
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| - | Tailings Manag | gement |
| Tailings management policy and commitment | | Not applicable. There are no tailings at this facility |
| Assigned accountability for tailings management | | Not applicable. There are no tailings at this facility |
| Tailings management system and emergency preparedness | | Not applicable. There are no tailings at this facility |
| 4. Operation, maintenance, and surveillance (OMS) Manual | | Not applicable. There are no tailings at this facility |
| 5. Annual tailings management review | | Not applicable. There are no tailings at this facility |



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

Water Stewardship

Interviews included: Environment Advisor, Effluent Treatment Plant (ETP) and Utilities Supervisor

Documents reviewed included: Sustainability Policy, Water and Water Resources Policy, Management of Water Resources and Effluents Procedure, Canadian EMS Environmental Policy Statement, Health, Safety, Environment, Community and Operational Event Management procedure, OMS Manual for Port Colborne Water Management Facility, Water Quality Management Plan, Port Colborne Environmental Aspects and Impacts Map, Environment Advisor Job Description, Environment Manager Job Description, Environment Supervisor Job Description, New Employee Orientation Permit to Take Water Noncompliance documentation, Environmental Monitoring Plan and results, Hazard Identification and Risk Assessment (HIRA) for Material Unwanted Event (MUE) Uncontrolled release of toxic solids/sediment from the external pond, HIRA – MUE Effluent Treatment Plant – Effluent at Internal Discharge Pond, Canada Ops Internal Audit Dec 2024, Water Stewardship External Audit MAC TSM Dec 2024 and associated OFIs tracking, Environmental Compliance Approval A120310 Sep 2024, 2024 Annual Monitoring Report for Port Colborne Landfill ECA A120310, Environmental Compliance Approval A-500-2-2197364087 May 2025, Assorted SOPs for Effluent Treatment Plant, Water Balance Port Colborne Refinery, Emergency Repair Plan for PCR External Polishing Pond, 2025 Environmental Objective record, Environmental Training Matrix, Vale Ontario Operations Operator/Inspector Training for Dams, ETP Training Curricula and Functional Training Check sheet for MT 2025, Port Colborne Closure Plan, Environmental Impact and Aspect Register, 2024 and 2025 Water Intensity Tracker, Monthly HSER Performance meeting, Journey Together Port Colborne 2023-2024, PGS-5973 Canada EMS Stakeholder Environmental Feedback procedure, 2024 Vale Integrated Report and ESG Data Book

| 1. Water Governance | AAA | There is demonstrated senior management commitment through the Sustainability Policy and the Water and Water Resources Policy consistent with the MAC Water Framework. The commitment is communicated through PORT meetings and in community open houses. 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 December 2024. An external audit was conducted by WSP in |
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| | | December 2024. |



| | Rating | |
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| Criterion | C, B, A, AA or AAA (unless otherwise indicated) | Comments |
| 2. Operational Water Management | A | The site has identified facility-level risks related to surface water and ground water with critical controls identified and verified. A water balance was prepared. Processes are established to monitor water performance for both surface water and groundwater. Groundwater is modelled. Records of water quality and quantity are maintained. The site has a systematic approach to operational water management described in the Water Quality Management Plan (WQMP). Response plans have been established for water related risks and incidents. Relevant employees have been provided with appropriate training (ETP Operator). Opportunities to improve water performance have been identified. Critical controls are monitored. by Sudbury personnel in November 2024. An external audit was conducted by WSP in December 2024 and the resulting opportunities for improvement are being tracked. Long-term water management consideration have been incorporated into closure plans. |
| 3. Watershed-scale Planning | AA | Vale has identified watershed in the Environmental Impacts and Aspects map. Relevant COI have been identified. Responsibility of water-shed planning has been designated. Engagement with the City of Port Colborne, Niagara Peninsula Conservation Authority and Niagara Coastal has taken place and opportunities have been identified. The facility communicates with relevant COI (e.g., governmental agencies) to help them understand how operational practices address risks. |
| 4. Water Reporting and Performance | AAA | Vale's water performance target is documented on the Vale website. Progress is reported in the monthly HSER meeting. Facility is meeting its 2025 YTD water targets. Public reporting of performance against target is included in the Vale Integrated report. The data in the Integrated Report was independently verified. Vale Integrated Report 0c82cdc2-0eee-aa5f-1777-cddc02bd917d |



Statement of Verification

| Statement of Verification | | |
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| 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 | none | |
| Additional comments | Vale and Port Colborne Refinery 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 | 25/09/2025 | |
| Signature of lead verifier | there S. Rubinoff | |