

TSM Verification Report

Facility Information

Name of company	Hudbay Minerals
Name of facility	<p>Manitoba Business Unit</p> <p>Hudbay Minerals business can trace its history back almost a century, to the first mines in Manitoba's Flin Flon Snow Lake Greenstone Belt. It was there we laid the foundation for the mine-building expertise and community engagement that distinguish Hudbay to this day. Our operational focus in Canada, with two operating mines in British Columbia and Manitoba, is core to our ability to create sustainable long-term value for shareholders.</p> <p>Manitoba's Snow Lake region continues to be an area of opportunity as our reserves, processing capacity and exploration activities expand in the region, setting the stage for a new phase of growth. Our Lalor mine (gold, zinc, copper, silver) in Snow Lake is a meaningful low-cost gold producer that substantially benefited from the refurbishment of the New Britannia mill in 2021. Hudbay has been actively conducting drilling activities testing the down-plunge gold and copper extensions of the Lalor deposit, in the first step out drilling in the deeper zones at Lalor since the initial discovery of the gold zones in 2009.</p> <p>By living our values, we are able to build strong relationships with our host communities and governments, making us a better partner and a better company.</p> <p>Hudbay strives to treat the people in our host communities with the dignity and respect that they deserve. Our commitment is underpinned by the policies, procedures, and the numerous voluntary codes to which we adhere. They serve as a blueprint that guides our actions in critical areas such as community relations, environmental stewardship, health and safety, and human rights. By living our values, we are able to build strong relationships with our host communities and governments, making us a better partner and a better company.</p>
Address	<p>Mining in TORONTO, ONTARIO</p> <p>800-25 York St, TORONTO ONTARIO M5J 2V5</p>
Country of operation	Canada
Products/metals produced on site	Copper Zinc Gold Silver
Types of operations included in scope:	
Mining	X
Milling	X
Smelting	<input type="checkbox"/>
Hydrometallurgical	<input type="checkbox"/>
Refining	X

Other (please explain)	
Types of infrastructure included in scope:	
Roads	x
Rails	x
Ports	<input type="checkbox"/>
Other (please explain)	

Verifier Information

Name of lead verifier	Robert Duda
Verification firm	Safety Science Management Consulting Inc.
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	(Yes or No) Yes
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	08/2025 – 12/2025
Verification period	2022-2025

Verification Process

Summary of the verification methodology	<p>Hudbay has been a long-standing member of the Mining Association of Canada (MAC) Towards Sustainable Mining (TSM) Initiative and has provided support and leadership to the program. This program empowers mining companies to fulfill society's demand for minerals, metals and energy products in a socially, economically and environmentally responsible manner through site-level performance assessments. TSM is globally recognized as an industry-leading practice and has been adopted by national mining associations beyond Canada. Today, 12 other countries have adopted the program. Our participation in TSM supports Hudbay's accountability and transparency through site-level evaluations and public reporting across the protocols listed below.</p> <p>Scope of TSM Verification: Hudbay Minerals, Manitoba Operations. All operations at Hudbay Manitoba Operations noted will be included within the external verification including tailings, mine etc.</p> <p>The scope of work for this project involves the required external verification of Hudbay's facility performance against eight protocols in the MAC TSM program, as follows:</p> <p>In 2025, facilities will report publicly using the following protocols:</p> <ul style="list-style-type: none"> • Indigenous and Community Relationships (2019 version) • Biodiversity Conservation Management (2020 version) • Crisis Management and Communications Planning (2022 version) • Climate Change (2021 version) • Preventing Child and Forced Labour (2019 version) – only for companies undergoing external verification! • Water Stewardship (2018 version) • Safety and Health (2020 version) • Tailings Management (2023 version) – includes reporting on inactive sites • OMS Guide (2021 version) • Tailings Guide (2021 version) • Table of Conformance (2022 version)
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	<p>Are any other standards included in scope? None.</p> <p>Document and file sharing arrangements: Using sharepoint site under control of Huidbay.</p> <p>Date of Site Visit: 17-20 November 2025. Manitoba Operations</p> <p>Community of Interest representatives to be interviewed: Sampling of COI is outlined in the methodology below.</p> <p>Verification Schedule:</p> <ul style="list-style-type: none"> September-October 2025: Planning, Information request, Document Record review, Video Interviews, Risk Scanning, COI scanning November 2025: Site visit, Follow-up interviews and document review, Draft Reporting December 2025: Final Reporting and Submission to MAC <p>The scope of work for this project involves the conduct of an external verification of Huidbay performance indicators according to the MAC TSM verification program according to published TSM protocols. The verification scope is based on sampling and includes an assessment of the various management systems related to sustainability; hence, professional judgment is required in assessing the degree of implementation of a performance indicator and the quality of management processes and intervention.</p> <p>Inherent in any sampling is risk and to minimize the implications of sampling we will be utilizing professional standards of auditing. These standards are outlined in ISO19011, and those published by the Canadian Environmental Auditing Association (CEAA). The verification process and results do not infer or guarantee effectiveness of achieving performance indicator objectives or effective implementation of planned arrangements.</p> <p>Approach and Methodology</p> <p>The following is the overview of the external verification work plan with additional specific details provided below. The following methodology is in conformance with the MAC TSM verification guide.</p> <p>Step 1 - Planning</p> <p>As part of the planning process, Huidbay and Safety Science had a teleconference call to confirm scope, timelines, information request and other project particulars. An information request will be made to Huidbay to provide Safety Science with the following:</p> <ul style="list-style-type: none"> MAC TSM self-assessment during the current period for performance indicators including two previous periods; Last documented MAC TSM verification and media scan from MAC; Risks related to the TSM Protocols including access to information, resources and timelines. Company exposed risks (H&S issues/fatalities, emergencies, spills/releases will be scanned for relevance and sampling adjusted as necessary) Identify sampling strategy (i.e. identify information locations at sites, share-point, self-assessment scoring, risks identified) and discussion of resources and access to people to information Identify any new processes that have been implemented that may have resulted in a higher or lower scores; Discuss sampling depth and extension of sampling based on information obtained; Approach to COI identification (selection, number, discussion topics, using risks, performance information and self assessment data for COI sampling); Site visit approach, timing and length of visit for each site (discuss approach based on information collected, sampling of data, risks, media scan, performance levels etc.)
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	<ul style="list-style-type: none"> • MAC TSM reporting requirements, submission to MAC of draft report, process for handling performance level issues (disagreement) and, • Audit report(s) as evidence for demonstrating TSM performance self-assessed levels (using MAC TSM protocols). <p>Discussion was held with Hudbay on the interview sampling and site visit. Some interviews were held via conference call and others will be performed during the site visit. A combination of executive, senior management/ management, supervision and workers were be performed. Interviews were based on the relevant scope of the positions job function and the protocols.</p> <p>Step 2 - Verification</p> <p>The verification comprises conducting interviews, documentation and records reviews. The activities will include:</p> <ul style="list-style-type: none"> • a review of Hudbay's self-assessments for each of the TSM Protocols; • comparisons to previous self-assessment levels; • review any new or changed information to ensure that they meet the intent of external verification; and, • sampling supporting evidence that demonstrates the self-assessed level. <p>Based on MAC TSM requirements, the external verifier may, at their discretion, expand the verification (increase sampling size and number of facilities for the verification) based on the consistency of the findings. Based on the judgment of the verifier, dialogue (interviews) with local COI regarding company performance may be necessary.</p> <p>Based on the outreach indicators self-assessment level and at the verifiers discretion, a sampling of COI was conducted to validate the implementation of engagement processes. We will work with Hudbay to identify COI that can be contacted. A 'TSM introduction' and the questions to be asked of the COI will be provided by Hudbay prior to the discussion. To remain objective and unbiased, the discussions/interviews will be held between the COI and the verifier and will not include Hudbay personnel. The number and depth of COI sampling will be determined as the verification progresses based on information gained from self-assessment, data review, media scan etc.</p> <p>The verification performance levels will be discussed with Hudbay and the MAC TSM external verifier program will be the guiding direction. We will provide Hudbay with the opportunity to identify additional evidence and information that may provide additional insight into Hudbay's self-assessed performance levels.</p> <p>Step 3 - Reporting</p> <p>Safety Science prepared an internal MAC TSM report and a public MAC TSM report for submission to MAC. The reports follow MAC prescribed requirements for approach and content to the reports.</p>
Summary of the verification activities	Safety Science utilized the above noted Approach and Methodology and reviewed documentation and records, performed interviews across the organization structure and involved COI and indigenous groups.
Was a site visit conducted?	Yes. See notes above regarding approach and methodology for the site visits.
Did the facility provide advance notice of the verification to communities of interest?	Yes. Communication materials were provided and verified by Safety Science.
Number and types of communities of interest interviewed to	Based on the outreach indicators self-assessment level and at the verifier's discretion, a sampling of COI was conducted to validate the implementation of engagement processes. To remain objective and unbiased, the discussions/interviews will be held between the COI and the verifier and did not include Hudbay personnel. The number

support the verification	<p>and depth of COI sampling was determined as the verification progresses based on information gained from self-assessment, data review, media scan etc.</p> <p>Based on Hudbay Manitoba operations workforce population we targeted at least thirty-five (35) interviews across executives, management / supervisor and workforce (including contractors) across the operations. We achieved our target and conducted forty (40) interviews across the organizational structure with 30% being workforce interviews. We believe this was adequate considering the management system approach across the operations, management structures and shared services and we found the interview information consistent with the self assessment information.</p> <p>Safety Science participated in two (2) public meetings that Hudbay performs quarterly to provide participants information on the company activities, issues, monitoring, environmental and other items that may have been raised by COI and indigenous groups. Hudbay held a session in Flin Flon and one in Snow Lake. Hudbay invites COI and indigenous groups to attend and includes information on social media and the radio. Additionally, some COI and indigenous are emailed information if its specific to their interests. Safety Science randomly interviewed ten (10) participants at both public meetings and discussed engagement processes, communication, notification, awareness, engagement procedures, response and other topic specific questions.</p>
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

Criterion	Rating C, B, A, AA or AAA (unless otherwise indicated)	Summary of Findings, Identified Gaps, and Examples of Evidence Consulted
Biodiversity Conservation Management		
1. Corporate biodiversity conservation commitment, accountability, and communications	AAA	<p>Summary of Findings</p> <ul style="list-style-type: none"> Hudbay demonstrated strong Corporate commitment demonstrated in Policy, ESG reporting, HSE Policy and site procedures Hudbay website includes commitment to sustainability and provides examples of biodiversity activities Corporate and facility programs have standards and expectations for management systems, programs Accountability and responsibility defined at all levels of organization Biodiversity action plans created with defined responsibilities Internal assessments verify commitment and implementation performed by Corporate and Site personnel Mitigation hierarchy outlined in actions plans and procedures <p>Identified Gaps to Achieve Level A (if applicable)</p> <ul style="list-style-type: none"> Not applicable

		Examples of Evidence Consulted <ul style="list-style-type: none"> • Website • Sustainability Reporting • Standards • HSE Policy • Environmental Aspects List • Interviews with site personnel and COI • Environmental procedures
2. Biodiversity conservation planning and implementation	AAA	Summary of Findings <ul style="list-style-type: none"> • Biodiversity standard includes requirements, actions, responsibilities, reporting and inclusion of COI engagement in biodiversity activities • Baseline data has been established to manage biodiversity aspects • Standards have been established to define requirements, procedures, plans and responsibility • Biodiversity standards include objectives of no net loss and specific MBU biodiversity objectives • Business plans include budgetary requirements • Internal assessments verify commitment and implementation performed by Corporate and Site personnel • Mitigation hierarchy outlined in actions plans and procedures • Accountability and responsibility defined at all levels of organization including environment department that has specific roles and requirements for procedures and action plans • Hudbay has participated in governmental agencies on wildlife and Caribou monitoring studies to supplement Manitoba government data to aid in habitat conservation and sustainability • Studies and monitoring for environmental effects Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • Not applicable Examples of Evidence Consulted <ul style="list-style-type: none"> • Standards • Environmental Aspects List • Interviews with site personnel and COI • Environmental procedures • Engagement records • Environmental monitoring studies and data • COI engagement records • Safety Science participation in public meetings in Flin Flon and Snow Lake
3. Biodiversity conservation reporting	AAA	Summary of Findings <ul style="list-style-type: none"> • Hudbay publishes sustainability key performance data on its website and includes wide range of information for: land, surface water, land-use etc. • Hudbay reports to Global Reporting Initiative (GRI) on wide range of indicators • Reporting on Biodiversity contained within company ESG reporting and quarterly public reporting in Flin Flon and Snow Lake • Historical regulatory permitting documents have included biodiversity • Internal assessments verify commitment and implementation performed by Corporate and Site personnel • Public meetings included feedback actions and company personnel at each location were present to answer questions and provide information • Link to information can be found: Hudbay Minerals Inc. - Home

		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> Not applicable
		Examples of Evidence Consulted <ul style="list-style-type: none"> Hudbay Website Sustainability Report including related verification Public Meeting Presentations and Handouts Participation in Public meetings in Flin Flon and Snow Lake
Climate Change		
1. Corporate climate change management	A	Summary of Findings <ul style="list-style-type: none"> A revised strategy, entailing a set of BU-specific targets was publicized in Hudbay's 2024 Annual Report. These revisions were made primarily in response to recent anti-greenwashing provisions, limiting what can be publicly stated. The corporate scorecard is part of the process related to board and management accountabilities Governance and risk / opportunity details are disclosed within the Management Information Circular Hudbay has been tracking and disclosing scope 1 and 2 emissions since the introductions of federal requirements Hudbay has opportunities to integrate climate change into risk management activities and consideration of offsets to improve MAC TSM performance levels
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> Not applicable
		Examples of Evidence Consulted <ul style="list-style-type: none"> Hudbay Website Sustainability Report GHG Reduction Roadmap Charter Tailings Risk Register Extract Annual CDP Report Enterprise Risk Management (ERM) files Health, Safety & Environment Policy
2. Facility climate change management	AA	Summary of Findings <ul style="list-style-type: none"> MBU EHS Policy outlines commitments and setting objectives and targets for the facility and is signed by the VP of the MBU Environmental Strategy & Objective Framework guides departmental level objectives Numerous departmental objectives in 2025 are focusing on reduction of emissions and increasing the use of clean (hydroelectric and battery-operated) energy. Energy system includes assessment of all sources of energy (for scope 1 and 2 emissions) separated by operating departments. Energy system includes carbon associated with the use of reagents (i.e. Lime and CO2). 2023 Snow Lake Waste Disposal Ground design and construction required analysis of climate related impacts Energy and emission source (fuel, propane, electricity) amounts are tracked on a monthly basis where they are analyzed and reviewed at monthly Management EHS meetings Annual Environment Strategy & Objectives Framework is formalized for setting of performance targets and stewarded during the year and reviewed as part of the annual management review

		<ul style="list-style-type: none"> • Operators of key equipment underground are aware of the benefits of diesel reduction in terms of emissions to ensure optimal performance and track the hours of BEV operation in place of diesel consumption • Departmental objectives and targets are communicated to crews through management review meeting minutes which occur at least quarterly • Environmental contacts are also circulated to all employees regarding the importance of energy conservation and carbon footprints • Energy and climate change related activities are included in public meetings updates as needed • Internal audits review the energy and GHG emissions management system procedures and calculations <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Hudbay Website • Sustainability Report • GHG Reduction Roadmap Charter • Tailings Risk Register Extract • Annual CDP Report • Enterprise Risk Management (ERM) files • Health, Safety & Environment Policy • MBU Environmental Strategy and Objective Framework • MBU Env Strategy & Objective • Annual ECCC GHG Report and working files • MBU EHS Performance Presentation • Environmental Aspect List • EMS Control Plan for General Significant Impacts • Aspect ID & Evaluation • MBU Environmental Strategy 2024 Annual Report
3. Facility performance targets and reporting	AA	<p>Summary of Findings</p> <ul style="list-style-type: none"> • <u>Hudbay Minerals Inc. - Sustainability</u> • Facility level action plans are developed and implemented to align with the corporate commitment • MBU annual Environment Strategy and departmental annual objectives outlines performance targets and reporting • Hudbay's Annual Sustainability Report covers reporting on energy use and emissions. • Governmental GHG Quantification Requirements provides relevant emission factors that are used for quantification • Facility level targets are discussed in EHS Performance management review with department heads to roll out the overall MBU strategy for climate change adaptation and mitigation as part of the overall Environmental Strategy • Plans were rolled out at the beginning of 2025 as the overall climate change & emission strategy (incorporated into the overall annual Environment Strategy) • At the MBU, performance was demonstrated as being improved <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Hudbay Website • Sustainability Report • GHG Reduction Roadmap Charter

		<ul style="list-style-type: none"> • Tailings Risk Register Extract • Annual CDP Report • Enterprise Risk Management (ERM) files • Health, Safety & Environment Policy • MBU Environmental Strategy and Objective Framework • MBU Env Strategy & Objective • Annual ECCC GHG Report and working files • MBU EHS Performance Presentation • Environmental Aspect List • EMS Control Plan for General Significant Impacts • Aspect ID & Evaluation • MBU Environmental Strategy 2024 Annual Report
Crisis Management and Communications Planning - CORPORATE (YES or NO)		
1. Crisis Management and Communications Preparedness	Yes	<ul style="list-style-type: none"> • Summary of Findings • Hudbay has a Crisis Management Policy that outlines Hudbay's commitment to operational excellence • Hudbay maintains a Crisis Management Plan that defines protocols and overall responsibilities in a crisis situation • All Hudbay subsidiaries maintain emergency response plans for their operations • Crisis Management Policy is approved by the CEO • Crisis management is also an annual topic covered under the executives EHSC Management Review • Hudbay Crisis Management Procedure outlines and defines protocols and overall responsibilities in a crisis situation. • Media Spokesperson are defined and have roles and responsibilities • Emergency Contact Numbers contain site-wide contact information to be used in the event of an emergency, including off-site key stakeholder contact information such as media and other stakeholders requiring contact in a crisis • Facilities have their own contact forms for contact numbers which also include key external media and stakeholder information • Hudbay has requirements for communications procedure and tracks incoming and outgoing communications. • All emergency related documentation is controlled as per the company's document control procedure. • All copies of the emergency procedures manual are available electronically using the shared drive and can be accessed through computers
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Crisis Management Policy • Crisis Communication Checklist • Management Review agenda • Crisis Management Plan • Confidentiality and Insider Trading Policy • Code of Business Ethics & Conduct • Whistleblower Policy • Emergency Contact Information • Crisis Communication Guidance
2. Review	Yes	Summary of Findings <ul style="list-style-type: none"> • Hudbay document control procedures require that all documents are formally reviewed and re-approved at a minimum once every five years. • Hudbay procedures include updates to the documents be made when there is a personnel change

		<ul style="list-style-type: none"> • Crisis and Emergency plans are reviewed and revised annually and/or when there is a change in affected personnel and business changes may require review and revision of this plan and/or the affected subsidiary's emergency response plans for that operation • Emergency Contact Information was demonstrated as recently being updated • Crisis management team members were involved as part of recent situations with wildfires in 2025 • ESG Steering Committee took a break from scheduled agenda to discuss impacts of the evacuation
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Interviews with Corporate Crisis Management Team members including Chief Operating Officer • Crisis Management Policy • Crisis Communication Checklist • Management Review agenda • Crisis Management Plan • Confidentiality and Insider Trading Policy • Code of Business Ethics & Conduct • Whistleblower Policy • Emergency Contact Information • Crisis Communication Guidance • Post Crisis Lessons Learned Report – 2024 •
3. Training	Yes	Summary of Findings <ul style="list-style-type: none"> • Hubbay demonstrated review and training of the Crisis and Emergency plans through wildfires in Manitoba this past summer 2025 • Fires required an evacuation of both Flin Flon and Snow Lake in June, and a few weeks later a second evacuation of Snow Lake. • Crisis team was, and continues to be, fully engaged, and alerted the corporate crisis team who enacted their plan • Hubbay shut operations down in advance of the Snow Lake evacuation. • Site team executed their crisis management processes and, when necessary, escalated the situation to Corporate • Corporate team was provided with regular updates by the BU and as the situation progressed this led to communications company-wide and externally
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Interviews with Corporate Crisis Management Team members including Chief Operating Officer • Interviews with facility emergency management personnel • Crisis Management Policy • Crisis Communication Checklist • Management Review agenda • Crisis Management Plan • Emergency Contact Information • Crisis Communication Guidance • Post Crisis Lessons Learned Report – 2024

Crisis Management and Communications Planning - FACILITY (YES or NO)		
1. Crisis Management and Communications Preparedness	Yes	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Highbay has a formalized Potential Emergencies document that identifies the following key subject areas have been covered: Adverse Media Coverage, Earthquake, Explosion, Fire, Flammable Liquid Spill, Flood, Hazardous Substance Release, Loss of Data / Communications, Loss of Electricity, Loss of Critical Equipment, Loss of Water Supply, Medical, Personnel, Radiation Release, Severe Ice or Snow, Severe Windstorm, Structural Failure / Subsidence of Ground, Threats. • List identifies potential emergencies as well as the associated impacts and controls – references include appropriate portions of emergency procedures/manuals. • Highbay Emergency Control Flow Chart identifies the Crisis Management Team as under “Management Control Centre” for Level Three incidents. • OHSMS Global Responsibility & Authority outlines roles and responsibilities • Highbay Incident Assessment and Response document requirements and Highbay Emergency Preparedness procedure includes defined roles and responsibilities are contained in the various emergency related procedures. • Emergency Control Flow Chart outlines who needs to be notified and by whom, at each level of emergency or crisis, laying out level 1, 2 and 3 incidents. At Level 3, the Local Crisis Management Team is engaged. <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Potential Emergencies • MBU Crisis Management Presentation • Control Flow Chart • OHSMS Global Responsibility & Authority • Incident Assessment and Response • Emergency Preparedness • Crisis Management Policy (crisis management doc package) • Crisis communication Procedure (crisis management doc package) • Crisis Communications Plan • Media Spokesperson • Emergency Contact Numbers • Emergency Numbers (New Brit) • Emergency Numbers (Lalor) • Communication • Incoming Calls • Activity Log Form for Outgoing Calls
2. Review	Yes	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Emergency Log Master is the annual evidence that indicates that all parts of the facility were tested for evacuations. These evacuations include notification system tests. • This year the wildfire safety alerts from June and July 2025 have been provided as examples of alerting employees to a crisis and its developments. In these examples, several alerts were provided to address the evacuation crisis, and ongoing updates. • All emergency procedures are controlled electronically and are readily available at the corporate office via the appropriate Google Drive directories.

		<ul style="list-style-type: none"> • MBU Crisis Management presentation was given to the corporate management team at the September Management Review meeting. • Management at the corporate office being made aware in real time of actual crises with the wildfires: • Key corporate employees included on mailing lists that were sent to MBU • Updates regarding evacuation and operational shutdown provided at June Management Review meeting • Emails from CEO to all Hudbay employees / press releases demonstrated communication and updates of the situation
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Potential Emergencies • MBU Crisis Management Presentation • Control Flow Chart • OHSMS Global Responsibility & Authority • Incident Assessment and Response • Emergency Preparedness • Crisis Management Policy (crisis management doc package) • Crisis communication Procedure (crisis management doc package) • Crisis Communications Plan • Media Spokesperson • Emergency Contact Numbers • Emergency Numbers (New Brit) • Emergency Numbers (Lalor) • Communication
3. Training	Yes	Summary of Findings <ul style="list-style-type: none"> • Hudbay demonstrated an actual crisis / emergency response during the wildfires in the region occurring in June and July 2025 • Fires required an evacuation of both Flin Flon and Snow Lake in June, and a few weeks later a second evacuation of Snow Lake • During the evacuation the crisis team was, and continues to be, fully engaged, and alerted the corporate crisis team who enacted their plan also (see Corporate Crisis Checklist). The crisis continues, so next steps in the form of lessons learned will follow when our employees and communities' safety, and the ability to operate, are no longer the top priority.
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Potential Emergencies • MBU Crisis Management Presentation • Control Flow Chart • OHSMS Global Responsibility & Authority • Incident Assessment and Response • Emergency Preparedness • Crisis Management Policy (crisis management doc package) • Crisis communication Procedure (crisis management doc package) • Crisis Communications Plan • Media Spokesperson • Emergency Contact Numbers • Emergency Numbers (New Brit) • Emergency Numbers (Lalor)

		<ul style="list-style-type: none"> • Communication
Indigenous and Community Relationships		
1. Community of Interest (COI) Identification	AA	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Highbay has a comprehensive Stakeholder Engagement Program and is formalized through a set of Standards and Procedures • Highbay Stakeholder Engagement include: <ul style="list-style-type: none"> • identification and engagement of its stakeholders • appropriately incorporates understanding of stakeholder perspectives in Highbay plans and activities. • identify stakeholders interested in or affected by projects/operations within a region and document the results in a stakeholder register. • review and build from existing studies and desk-based research • define local and regional stakeholders with direct or indirect interests (and if appropriate indigenous or other minorities) • Engage personnel from a range of functions in the identification process (e.g. operations, community relations, health and safety, environment, human resources, procurement), and • Ask known stakeholders if there are others that should be included in the identification process • MBU has developed a site procedure Stakeholder Management to apply at a local level and includes requirements, roles and responsibilities • MBU demonstrated active encouragement of community identification of stakeholders in the two public meetings Safety Science attended • Highbay has a software program to manage COI and Indigenous contact information • Highbay procedures include review and update stakeholder register, stakeholder analysis and engagement plan at least annually, and when there are significant changes to the business or the stakeholder landscape, and share results with the corporate Sustainability department • Highbay has initiated discussion on improving formal collaboration efforts with COI and Indigenous to achieve AAA <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Safety Science participation in two public meetings: Flin Flon and Snow Lake in November 2025 • Stakeholder Engagement Standard • Stakeholder Management Procedure • Indigenous Relations Policy • Interaction Abstract List • Management review Meeting Minutes • Intranet Stories • Annual Sustainability Report (ASR) • Role Accountabilities (Landice, Sandy, Pam) • Local Procurement and Employment Standard • Stakeholder Engagement Guidance • Community Response Mechanism Standard • EMS Responsibilities Chart • Aspect List • Hazard Register • Two-Year Plans (Indigenous, and Community Engagement)

		<ul style="list-style-type: none"> Communications
2. Effective COI Engagement and Dialogue	AA	<p>Summary of Findings</p> <ul style="list-style-type: none"> Hudbay Stakeholder program includes requirements for identifying stakeholders interested in or affected by projects / operations within a region and document the results in the stakeholder register Environmental engagement. A sample has been provided in the Interaction Abstract List Hudbay demonstrated there are formal presentations and meeting minutes from the more formal interactions such as public meetings Hudbay interviews indicated communities and indigenous groups have been more actively involved in providing input over the past year At quarterly meetings with Manitoba Mines Branch the agenda is developed together through a section at the end of each meeting that asks for feedback to improve the next quarter (slide deck example attached as evidence) Questionnaires are provided in public meetings to inquire about the desired frequency of engagement, best methods of communication, and what type of topics for engagement COIs have interest in Indigenous Engagement activities are updated at monthly Management Review <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> Safety Science participation in two public meetings: Flin Flon and Snow Lake in November 2025 Stakeholder Engagement Standard Stakeholder Management Procedure Indigenous Relations Policy Interaction Abstract List Management review Meeting Minutes Intranet Stories Annual Sustainability Report (ASR) Role Accountabilities (Landice, Sandy, Pam) Local Procurement and Employment Standard Stakeholder Engagement Guidance Community Response Mechanism Standard EMS Responsibilities Chart Aspect List Hazard Register Two-Year Plans (Indigenous, and Community Engagement) Communications
3. Effective Indigenous Engagement and Dialogue	AA	<p>Summary of Findings</p> <ul style="list-style-type: none"> Hudbay Standard Stakeholder Engagement has processes to engage in dialogue with indigenous communities Processes follow key steps of: Identify, Understand, Plan, Engage, Respond Hudbay has dedicated staff for indigenous engagement and identify concerns and interests and assess relationships, dynamics and perceptions between stakeholder groups relevant to the operation Indigenous Relations Policy details processes to follow for engagement with indigenous peoples Hudbay identify stakeholders interested in or affected by projects/operations within a region and document the results in a stakeholder register Indigenous groups are invited to public meetings held in Flin Flon and Snow Lake

		<ul style="list-style-type: none"> Engage personnel from a range of functions in the identification process (e.g. operations, community relations, health and safety, environment, human resources, procurement) Hudbay demonstrated comprehensive processes to engage in dialogue with indigenous communities <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> Safety Science participation in two public meetings: Flin Flon and Snow Lake in November 2025 Stakeholder Engagement Standard Stakeholder Management Procedure Indigenous Relations Policy Interaction Abstract List Management review Meeting Minutes Intranet Stories Annual Sustainability Report (ASR) Role Accountabilities (Landice, Sandy, Pam) Local Procurement and Employment Standard Stakeholder Engagement Guidance Community Response Mechanism Standard EMS Responsibilities Chart Aspect List Hazard Register Two-Year Plans (Indigenous, and Community Engagement) Communications
4. Community Impact and Benefit Management	A	<p>Summary of Findings</p> <ul style="list-style-type: none"> Hudbay Stakeholder Standard includes process for impact and benefit management Hudbay demonstrated extensive engagement with indigenous groups and provided examples of encouraging participation Hudbay works with the Metis Employment and Training Centre, working with Northern MB Mining Academy to present to the women in industry training program Hudbay supports the Flin Flon Referral Service (which offers mental health counselling and anger management services as well as employment-search assistance) Hudbay Two-Year Plans have clear consideration of optimizing benefits to communities including developing talent pipeline from northern communities, providing more opportunities for two-way communication to seek feedback, hosting events to build community culture (family day, pancake breakfasts, community smudging's) and supporting community initiatives (such as aqua-center) Process to engage with local COI is described within Hudbay Local Procurement and Employment Standard <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> Safety Science participation in two public meetings: Flin Flon and Snow Lake in November 2025 Stakeholder Engagement Standard Stakeholder Management Procedure Indigenous Relations Policy Interaction Abstract List Management review Meeting Minutes

		<ul style="list-style-type: none"> • Intranet Stories • Annual Sustainability Report (ASR) • Role Accountabilities (Landice, Sandy, Pam) • Local Procurement and Employment Standard • Stakeholder Engagement Guidance • Community Response Mechanism Standard • EMS Responsibilities Chart • Aspect List • Hazard Register • Two-Year Plans (Indigenous, and Community Engagement) • Communications
5. COI Response Mechanism	A	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Huidbay Communications and Stakeholder Engagement Procedure outlines a formal complaint system for managing external issues and grievances • Huidbay monitors COI concerns and engagement mechanisms and through the tracking in software • Public meetings include feedback during the meeting and they provide an email address for the public, COI and indigenous to contact Huidbay and make inquiries and feedback • Communications outlines a "Concerns/Alert" system and Corporate maintains an additional system • Organization seeks to understand COI concerns through other avenues including the ongoing COI engagement processes including informal ongoing community meetings with aboriginal groups regarding exploration / development activities, business and training opportunities, etc. • Huidbay demonstrated the facility's response mechanism feedback is sought at public meetings. <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Safety Science participation in two public meetings: Flin Flon and Snow Lake in November 2025 • Stakeholder Engagement Standard • Stakeholder Management Procedure • Indigenous Relations Policy • Interaction Abstract List • Management review Meeting Minutes • Intranet Stories • Annual Sustainability Report (ASR) • Role Accountabilities (Landice, Sandy, Pam) • Local Procurement and Employment Standard • Stakeholder Engagement Guidance • Community Response Mechanism Standard • EMS Responsibilities Chart • Aspect List • Hazard Register • Two-Year Plans (Indigenous, and Community Engagement) • Communications
Preventing of Child and Forced Labour (Indicate YES or NO)		
1. Preventing Forced Labour	Yes	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Huidbay MBU are in jurisdiction that has low risk of child and forced labour and has a strong regulatory and enforcement system

		<ul style="list-style-type: none"> • Highbay website communicates values that include respect for the rights of the people who work on our behalf and those who live in the communities near our operations. • Code of Business Conduct and Ethics and Human Rights Policy demonstrate support for the principles of the Universal Declaration of Human Rights and affirm our respect for human rights through our business conduct and management practices • Highbay fair labour practices include zero tolerance for forced, compulsory and child labour, and we work to prevent any infringement upon human rights within our sphere of influence • Highbay outlines that the UN Guiding Principles on Business and Human Rights provides a blueprint for businesses that includes a public commitment, a due diligence process that assesses risks, and a process for providing remedy to anyone who is impacted. Concerns about human rights issues within our business can be reported via site grievance mechanisms or directly to our Board of Directors through our corporate website or third-party ethics hotline. • Highbay website outlines the operations, projects and exploration sites where we employ security personnel apply the Voluntary Principles on Security and Human Rights (the VPs), which prioritize relationship building and provide a framework for maintaining safety and security within an operating context that ensures respect for human rights and fundamental freedoms
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Highbay Website • Highbay Sustainability Report • Highbay Disclosure policies and documents • Highbay interviews with key contacts
2. Preventing Child Labour	Yes	Summary of Findings <ul style="list-style-type: none"> • Highbay maintains hiring practices to validate identify of persons during hiring processes • Don't hire under age of 18, mine regulations and Canadian regulation • Background checks are performed based on valid ID, passport, driver licence and includes combination of criminal check, certificates education • Validation part of the contracting process to ensure regulatory requirements are followed by contractors
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Highbay Website • Highbay Sustainability Report • Highbay Disclosure policies and documents • Highbay interviews with key contacts
Safety and Health		
1. Commitments and Accountability	AAA	Summary of Findings <ul style="list-style-type: none"> • Highbay has a long standing certification to ISO45001 and has internal and external audits <ul style="list-style-type: none"> • <u>Highbay has used the TSM H&S Abridged External Checklist for the TSM self assessment</u>

		<ul style="list-style-type: none"> • Hudbay MBU HSE Policy includes commitments to work in a safe and healthy manner, to comply with or surpass legal requirements, to reduce and control risk and to continually improve. • Hudbay Environmental Health and Safety Policy sets out our commitment to control risks, transparently report on our performance, and continuously strive for a healthier workforce and safer workplace • Hudbay website communicates “Nothing is more important than the safety and health of our employees, contractors and the people who live near our mines. We adhere strictly to policies and practices that ensure a healthy and safe work environment everywhere we operate.” • Management systems at Hudbay production facilities are certified to ISO 45001, an internationally accepted standard for occupational health and safety management systems. We also apply the Mining Association of Canada’s (MAC) Towards Sustainable Mining (TSM) Safety and Health protocol to assess and measure our performance. Regular monitoring, self-assessments and tri-annual third-party verifications ensure our operations remain in compliance with TSM standards and protocols throughout the life of the operation. • Hudbay website outlines they are building a culture dedicated to zero harm. This means ensuring that everyone who works at our sites has the knowledge, skills and equipment to work safely, and that our leaders empower their teams and actively encourage them to speak up, especially when they have concerns. Initiatives – such as the supervisor mentor program in Manitoba – aim to support supervisors in effectively engaging with their teams so that everyone understands the risks associated with tasks and the work environment. Ultimately, our goal is zero harm – with no fatalities and no injuries. • Hudbay demonstrate a comprehensive health and safety management system with clearly defined roles and responsibilities
		<p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Health Safety and Environment Policy • Internal audit report • External audit report and summary • Hazard ID - Risk Assessment Procedure • Life Saving Rules • Hazard Registers • SIF checklist / response records
2. Planning and Implementation	AAA	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Hudbay demonstrated a comprehensive health and safety management system that includes identification of high consequence hazards, and related controls • Life Saving Rules (LSR) program (implemented Q1 2020), is designed to target particularly high-risk activities and provide training and controls to maintain safety • Hazard Registers at each level identify the hazards and provide controls to mitigate the risk • Hudbay has an established Significant Injury & Fatality (SIF) Risks system – a system for validating and checking that the critical controls in place to prevent fatal risks are actually working through a checklist that managers, supervisors and workers use while out in the field. Within the SIF system, data is recorded, and one can review the analytics to test whether improved controls made a difference. • Workplace exposures are well known from a long history. Exposure levels are measured, and re-measured when changes to existing controls implemented to ensure effectiveness. Overall program

		<p>effectiveness monitored with lung function testing and biological monitoring program. Radiation safety program in place with documentation found in our Management System – Radiation Program.</p> <ul style="list-style-type: none"> • Highbay has definitions of controls (underpinning, mitigating, and critical). These are expected to be incorporated into control plans, which are then monitored by the SIF programme. If controls are not working, work stops and adjustments must be made. • Highbay Hazard Registers include a note that states “If deemed a “critical control” a Measurement and Reaction Plan must be identified, not optional.” Each register records the action plan in addition to the controls listed. <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • PWP-524 Health Safety and Environment Policy • PWP-035 Hazard ID - Risk Assessment Procedure • PWP-557 Life Saving Rules (2020-03-05) • Hazard Registers (provided two examples) • SIF checklist / response records • PWT-019 Radiation Awareness • Training Standard • Task Observations • Risk Assessment Training • Management Review EHS Performance Review • Visible Felt Leadership • VFL Tracking Report • Surface and Shops Field Risk Assessment • Management Review Presentation
3. Training, Behaviour and Culture	AAA	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Highbay has a comprehensive and formalized Training Program including a documented instruction Task Observations. • Life-saving rule program includes training on high consequence tasks. • Within the HR 24-Month Strategic Plan (October 2024), one of the pillars is Wellness. Under this pillar, there are highlighted opportunities to encourage health and wellness and a healthy lifestyle, such as: • Mental health support • Mult-track training schedule (includes alcohol & drug policy, harassment / respectful workplace, employee benefits, mental health first aid, etc) • Two slides of the strategic plan are devoted specifically to health, wellness and wellbeing, as well as an appendix specifically for wellness. • Wellness programs to encourage health and wellness evidenced in the Wellness Committee Meeting Minutes and include Mental Health First Aid training available (ahttps://openingminds.org/training/twm/) and Monthly wellness newsletter • Highbay demonstrated examples of engagement on wellness including Wellness Bingo, and the Wellness Challenge are encouraged for employees to participate in • Highbay demonstrated events that occur to promote a mentally healthy lifestyle such as Family Mine Day, which encouraged families to come out for mine tours and activities so families could learn more about what our employees do <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p>

		<ul style="list-style-type: none"> • Internal audit report • External audit report and summary • Radiation Awareness • Anti-Harassment Violence Prevention • Alcohol & Drug Policy • Accommodation Policy & Procedures • Respectful Work Environment • Bereavement Leave • Annual Sustainability Report • Wellness Committee Meeting Minutes • Wellness Bingo / Wellness Challenge • Training Standard • Task Observations • Risk Assessment Training • (Management Review) EHS Performance Review • Visible Felt Leadership • VFL Tracking Report • HSE Internal Audit Schedule • Surface and Shops Field Risk Assessment • Management Review Presentation
4. Monitoring and Reporting	AAA	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Highbay demonstrated monitoring and reporting processes, tracking, communication and external reporting through the 2024 Annual Sustainability Report – Report safety performance metrics to ICMM standards. • Monthly Management Review presentations and minutes provide evidence of ongoing monitoring and internal reporting of both leading and lagging indicators. As seen in the example provided, graphs and charts showing: • TRIF / Lost time severity • Highbay uses methodologies for incident investigation including ICAMs • High Potential Incident reviews are performed • Progress towards the Life Saving Rules program (hot work, confined spaces, working from heights, etc.) • Planning and initiatives at different areas of site • SIF program also has a responses report that is continuously updated as data is submitted. • HSE Internal Audit Schedule outlines an audit plan that focuses on Hazard Audits – Life Saving Rules. • LSR audits include focus on high consequence hazards. • Field risk assessments are carried out and there is a threshold to stop work to add controls before starting work again (PWO-157 attached as an example). • SIF program is based on a focus of critical controls. • Highbay demonstrated audits with a focus on aspects and critical controls <p><u>Highbay Minerals Inc. - Sustainability - Health and Safety</u></p> <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Internal audit report • External audit report and summary • Accommodation Policy & Procedures • Respectful Work Environment • Bereavement Leave • Annual Sustainability Report

		<ul style="list-style-type: none"> Wellness Committee Meeting Minutes Wellness Bingo / Wellness Challenge Training Standard Task Observations Risk Assessment Training (Management Review) EHS Performance Review Visible Felt Leadership VFL Tracking Report HSE Internal Audit Schedule Surface and Shops Field Risk Assessment Management Review Presentation
5. Performance	AAA	<p>Summary of Findings</p> <ul style="list-style-type: none"> Hudbay had zero (0) fatalities in 2024 Hudbay Management Review minutes record information and analysis of performance and there are risk reduction objectives and targets as well as targets around LTI and Lost Time Severity Regular benchmarking via stats included in the company Annual Sustainability Report, which use ICMM definitions, as do many of our peers (thereby allowing for said comparison). As a company, we participate in the Mining Safety Roundtable, as well as respond to several external questionnaires that are used to benchmark our performance (examples include: S&P, ISS, Sustainalytics, Corporate Knights, etc.) <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> Internal audit report External audit report and summary Annual Sustainability Report Wellness Committee Meeting Minutes VFL Tracking Report HSE Internal Audit Schedule Surface and Shops Field Risk Assessment Management Review Presentation
Tailings Management		
1. Tailings management policy and commitment	A	<p>Summary of Findings</p> <ul style="list-style-type: none"> Hudbay has a long-standing commitment and policy for Tailings Management Hudbay Minerals Inc., MBU is committed to managing process wastes in a manner that protects the human health of our employees and community residents and the natural environment Tailings Governance Charter, Tailings Facility Policy and Corporate EHS Policy all commit to using MAC/TSM to guide operations, which connects with the MAC/TSM commitment to responsible tailings management and minimization of harm. Hudbay MBU demonstrated objectives and targets for tailings management and communication of policy and commitments <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> Tailings Facility Policy Tailings Governance Charter Health, Safety and Environment Policy Hudbay Standard Stakeholder Engagement

		<ul style="list-style-type: none"> • Training • Communication • Emergency Preparedness • Management Review • Document Control • Environmental Control Competency & Responsibility Chart • Tailings Operations Engineer Training Manual • Flin Flon Daily Monitoring and Inspection form
2. Assigned accountability and responsibility for tailings management	A	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Highbay demonstrated formalized processes and description of competency & responsibilities for tailings management • OMS Manuals provide specific roles and responsibilities for employees as appropriate to their roles • Highbay governance of Tailings Management is outlined in a Governance Charter • Role and responsibilities of the independent review board and key tailings positions (engineer of record, responsible person etc.) were demonstrated <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Tailings Governance Charter • Environmental Control Competency & Responsibility Chart • Tailings Operations Engineer Training Manual • OMS Manuals
3. Tailings management system and emergency preparedness	A	<p>Summary of Findings</p> <ul style="list-style-type: none"> • OMS and Emergency documentation for tailings facilities demonstrated the use of risk management and critical controls • Environment Risk Register was demonstrated that is reviewed by department managers on a quarterly basis • Dam safety inspections and reviews were demonstrated • Emergency preparedness and response plans were demonstration • OMS manuals each outline the surveillance and documentation requirements for each failure mode were demonstrated <p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None <p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • Risk Management procedures • Training procedures • Environmental Control Competency & Responsibility Chart • Tailings Operations Engineer Training Manual • Flin Flon Daily Monitoring and Inspection form • Flin Flon Weekly Compliance Monitoring and Inspection Form • Weekly Flin Flon Dam Inspections form • FFTIS Monthly Dam Inspection form • Flin Flon OMS Manual - Module 01 Governance • Flin Flon OMS Manual - Module 02 Facility Description • Flin Flon OMS Manual - Module 03 Water-Management System
4. Operation, maintenance, and surveillance	A	<p>Summary of Findings</p> <ul style="list-style-type: none"> • OMS Manuals have been specifically implemented at Flin Flon, Anderson Lake and Birch Lake

		<ul style="list-style-type: none"> • OMS Manual describes the facility, including a tabulated list of components and subcomponents that are considered to be part of the scope of facility management • Manual issued with input from operating personnel from multiple departments
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Flin Flon OMS Manual • Anderson OMS Manual • Birch OMS Manual
5. Annual tailings management review	A	Summary of Findings <ul style="list-style-type: none"> • Hudbay demonstrated a comprehensive Management Review process including a tailings governance team • Tailings management is reviewed annually on the Board Technical Committee agenda. • Annual tailings facility status update to Accountable Executive Officer • Tailings management topics below are reviewed during Independent Review Board Meetings • Key tailings management and performance topics reviewed with Accountable Executive Officer during the monthly MBU Key Projects meeting • Tailings management, performance, status, and other topics reviewed with the senior management at the monthly meetings
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • Tailings Facility Policy • Tailings Governance Charter • Health, Safety and Environment Policy • Flin Flon OMS Manual - Module 01 Governance • Flin Flon OMS Manual - Module • Management Review • Management Review
Water Stewardship		
1. Water Governance	AA	Summary of Findings <ul style="list-style-type: none"> • Hudbay's Health, Safety and Environment Policy includes a commitment to prevent and/or minimize pollution to water. • Policy is signed by the VP Manitoba Business Unit • EMS Responsibilities outlines division of accountability for setting and achieving environmental objectives and targets; this includes water consumption reduction initiatives. • Management Review and Department Heads are responsible to ensure environmental targets are set • Objectives and targets for water management require facility-wide supporting targets, which include the assignment of accountabilities within individual departments (e.g., New Britannia Mill and Snow Lake Mill). • Environmental Reporting Matrix specifies the water quality reporting that is required under all regulations and licenses that apply to MBU facilities, as well as who is responsible for this reporting. • Water Sampling Manual specifies that monthly, quarterly, and irregular sampling is to be scheduled by the Supervisor of Environmental Programs or designate.

		<ul style="list-style-type: none"> • Environmental Requirements Register is intended to capture all regulations applicable to the MBU's facilities including water regulations. • All employees, contractors and visitors are trained in the Health, Safety and Environment policy and an associated bulletin was circulated to all employees and contractors • Hudbay's Employee/Contractor Orientation outlines the commitment to reducing reliance on fresh water and minimizing any harmful impact on local water resources. • Environment Department employees are required to be trained in the MBU water quality monitoring programs and procedures • Hudbay demonstrated water management communication to COI and indigenous groups through two public meetings: Flin Flon and Snow Lake. • Public engagement sessions are hosted annually in Flin Flon and Snow Lake to inform the public on various operational changes and updates to MBU facilities. • Manager of Environmental Control and Indigenous Relations Liaison held a cross-cultural workshop on water in Opaskwayak Cree Nation • Environment's quarterly newsletter focused on water • Risks regarding water management / water quality are captured in the ERM. This includes budgeting for actions that require additional funds. The Environment Department budget has placeholders for water quality investigations in case the need arises. • Internal Audit focused on resource consumption and water release • Gap analysis was completed to assess the individual commitments contained in the Framework against existing processes • Annual Sustainability Report includes a water usage assessment and whether Hudbay's water stewardship practices remain compliant with relevant regulations.
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • 2025 Water Sampling Calendar • 2023 SGS External Audit Report • Internal Audit Report • Stall Mill Internal Audit Report • Audit Plan and Report • EMS Control Plan • Reporting Matrix • Environment Competency & Responsibility Chart • Effluent Quality Emergency Response Plan • ATIA OMS Manual - Module 06 Water Management Plan • EMS Responsibilities • MBU Environmental Aspect List • Environmental Requirements Register • EMS Control Plan for General Significant Impacts • Management Review • Health Safety and Environment Policy • Environmental Incident Response Plan
2. Operational Water Management	A	Summary of Findings <ul style="list-style-type: none"> • Hudbay demonstrated comprehensive water management activities including procedures, roles, responsibilities, tracking of data etc. • Risks and potential impacts to water resources are evaluated in Environment Act Proposals (e.g., for Reed Mine, Lalor Mine, expansion of Anderson TIA and New Britannia Mill).

		<ul style="list-style-type: none"> • Environmental Aspects and their associated impacts and level of risk are identified in Environmental Aspect List, including water consumption, contaminated mine water, effluent release over regulatory limits, and spills • MBU Environment Strategy and the 2025 Effluent Quality compliance objective used a comprehensive tool to look at surface water quality and risks at each treatment facility • Water quality is monitored via sampling as per the water sampling schedule for each site as per regulatory requirements • Sampling calendars are developed by the Supervisor, Environmental Programs or designate to ensure that the correct frequency and spacing requirements were followed, and the correct analyses are scheduled • Monthly Water Sampling Calendar is communicated to all personnel involving water sampling • Water consumption quantities are tracked by the Environment Department via pump totalizer readings on the software app PI Vision. • Water quality data is maintained by the Environment Department using EQWin Environmental Data Management Software and regularly reported internally and to relevant government agencies. • Departmental water records are monitored by PI Vision and annual water use records are maintained by the Environment Department based on this data. • Hudbay has discussed reviewing its auditing program to include conformance requirements per TSM criteria to achieve higher MAC TSM performance levels
		<p>Identified Gaps to Achieve Level A</p> <ul style="list-style-type: none"> • None
		<p>Examples of Evidence Consulted</p> <ul style="list-style-type: none"> • 2025 Water Sampling Calendar • 2023 SGS External Audit Report • Internal Audit Report • New Britannia Birch Lake TDF Discharge Procedure • Flin Flon Groundwater Well Monitoring Log • Environmental Scientist Training Checklist • Irregular Sample Schedule • New Britannia Groundwater Well Monitoring Log • Water Sampling Manual • North Weir Manual • Effluent Quality Emergency Response Plan • ATIA OMS Manual - Module 06 Water Management Plan • Environmental Requirements Register • EMS Control Plan for General Significant Impacts • Management Review • Health Safety and Environment Policy • Environmental Incident Response Plan • Flin Flon QC for Water Sampling Program • Lalor Chisel QC for Water Sampling Program • New Brit QC for Water Sampling Program • Reed QC for Water Sampling Program • Environmental Scientist Training Manual • Wastewater Treatment Plant
3. Watershed-scale Planning	AAA	<p>Summary of Findings</p> <ul style="list-style-type: none"> • Watersheds are identified in Environmental Act License applications for each facility.

		<ul style="list-style-type: none"> • Process for COI identification is the same as that used in Indigenous and Community Relationships and is outlined in a Corporate standard • Lists of COIs are maintained at a corporate level and in a database • Engagement sessions are held with Flin Flon, Snow Lake, Manitoba Metis Federation, and Flin Flon Cottage Owner's Association regarding elevated selenium levels in fish tissue from Schist Lake <ul style="list-style-type: none"> • Sessions focus heavily on the downstream watershed and updates are provided quarterly. • Stakeholders and COI's that would be involved in watershed-scale planning and management are assigned a Stakeholder Manager in the Intellex system who is responsible for engagement and planning. • As part of watershed-scale planning, both Manitoba and Saskatchewan governments have been active in engagement on the Schist Lake selenium studies in Flin Flon.
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> • None
		Examples of Evidence Consulted <ul style="list-style-type: none"> • 2025 Water Sampling Calendar • 2023 SGS External Audit Report • Internal Audit Report • Stall Mill Internal Audit Report • Audit Plan and Report • EMS Control Plan • Reporting Matrix • Environment Competency & Responsibility Chart • New Britannia Birch Lake TDF Discharge Procedure • Flin Flon Groundwater Well Monitoring Log • Environmental Scientist Training Checklist • Irregular Sample Schedule • New Britannia Groundwater Well Monitoring Log • Water Sampling Manual • North Weir Manual • Effluent Quality Emergency Response Plan • ATIA OMS Manual - Module 06 Water Management Plan • 2023 Q3 Environment Quarterly Newsletter • Communities of Interest Standard • Huidbay Standard Stakeholder Engagement • EMS Responsibilities • MBU Environmental Aspect List • Environmental Requirements Register • EMS Control Plan for General Significant Impacts • Management Review • Health Safety and Environment Policy • Environmental Incident Response Plan • Flin Flon QC for Water Sampling Program • Lalor Chisel QC for Water Sampling Program • New Brit QC for Water Sampling Program • Reed QC for Water Sampling Program • Environmental Scientist Training Manual • Wastewater Treatment Plant
4. Water Reporting and Performance	A	Summary of Findings <ul style="list-style-type: none"> • Huidbay demonstrated water quality performance objectives are defined by regulatory requirements as per site Environment Act Licenses • Internal performance objectives are determined, tracked, and reviewed through the EMS via departmental water use reduction objectives.

		<ul style="list-style-type: none"> Water use reduction objectives are set through the annual Environmental Strategy and Objective Framework. Progress is tracked and reported to senior management during monthly EHS Performance meetings. Water use is included in the Annual Sustainability Report. Hudbay demonstrated a Public Meeting that included discussions on Water discharges and monitoring in local watershed General Inquiry email to encourage the public to communicate with the department, including feedback and comments on water stewardship. Questionnaires are given to attendees at public engagement events, including the selenium sessions and Trout Lake dam info session to seek feedback. <p><u>Hudbay Minerals Inc. - Sustainability - Environment</u></p>
		Identified Gaps to Achieve Level A <ul style="list-style-type: none"> None
		Examples of Evidence Consulted <ul style="list-style-type: none"> Hudbay Website Hudbay Sustainability Report 2025 Water Sampling Calendar 2023 SGS External Audit Report Internal Audit Report Stall Mill Internal Audit Report Audit Plan and Report EMS Control Plan Reporting Matrix Environment Competency & Responsibility Chart 2023 Q3 Environment Quarterly Newsletter Communities of Interest Standard Hudbay Standard Stakeholder Engagement EMS Responsibilities MBU Environmental Aspect List Environmental Requirements Register EMS Control Plan for General Significant Impacts Management Review Health Safety and Environment Policy

Statement of Verification

Statement of Verification	
The external verification was conducted in accordance with the <i>Terms of Reference for 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.	X The external verification was conducted in accordance with the <i>Terms of Reference for Verifiers</i> .
The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.	X The scores in this report are considered accurate based on this verification.
Limitations	None.
Date of statement of verification	10 December 2025
Signature of lead verifier	