

## TSM Verification Report

### Facility Information

Name of company	Hudbay Minerals Inc. Peru
Name of facility	<p>Constancia Unit</p> <p>Hudbay arrived in Peru with the acquisition of the Constancia copper project in 2011. Constancia is Hudbay's 100% owned copper operation located in the province of Chumbivilcas in southern Peru and consists of the Constancia and Pampacancha deposits. We completed construction of Constancia in 2014, and the mine went from first production to full production in just five months. The Constancia operations also include the nearby Pampacancha satellite pit, a high grade copper-gold deposit where mining activities began in 2021 which will be completed in late 2025.</p> <p>The company acquired a series of properties near Constancia, adding a large, contiguous block of exploration prospects within trucking distance of the Constancia processing facility, including the past producing Caballito property and the highly prospective Maria Reyna property. The company commenced early exploration activities at Maria Reyna and Caballito after completing a surface rights exploration agreement with the community of Uchucarcco in August 2022. As part of the drill permitting process, environmental impact assessment (EIA) applications were submitted for the Maria Reyna property in November 2023 and for the Caballito property in April 2024.</p>
Address	Av. Jorge Chavez nro. 235 dpto. 701 Lima - Lima - Miraflores
Country of operation	Peru
Products/metals produced on site	Extraction of other non-ferrous metallic minerals
Types of operations included in scope:	
Mining	<input checked="" type="checkbox"/>
Milling	<input checked="" type="checkbox"/>
Smelting	<input type="checkbox"/>
Hydrometallurgical	<input type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other (please explain)	
Types of infrastructure included in scope:	
Roads	<input checked="" type="checkbox"/>
Rails	<input type="checkbox"/>
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)	21/10/2025 – 24/10/2025
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, Constancia Operations. All operations at Hudbay Constancia 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"> <li>• Indigenous and Community Relationships (2019 version)</li> <li>• Biodiversity Conservation Management (2020 version)</li> <li>• Crisis Management and Communications Planning (2022 version)</li> <li>• Climate Change (2021 version)</li> <li>• Preventing Child and Forced Labour (2019 version) – only for companies undergoing external verification!</li> <li>• Water Stewardship (2018 version)</li> <li>• Safety and Health (2020 version)</li> <li>• Tailings Management (2023 version) – includes reporting on inactive sites</li> <li>• OMS Guide (2021 version)</li> <li>• Tailings Guide (2021 version)</li> <li>• Table of Conformance (2022 version)</li> </ul> <p>Are any other standards included in scope? None.</p> <p>Document and file sharing arrangements: Using share-point site under control of Hudbay.</p> <p>Date of Site Visit: 21-24 October 2025. Constancia Operations</p> <p>Community of Interest representatives to be interviewed: Sampling of COI is outlined in the methodology below.</p>
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#### Verification Schedule:

- September-October 2025: Planning, Information request, Document Record review, Video Interviews, Risk Scanning, COI scanning
- October 2025: Site visit, Follow-up interviews and document review, Draft Reporting
- December 2025: Final Reporting and Submission to MAC

The scope of work for this project involves the conduct of an external verification of Hudbay 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.

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.

#### Approach and Methodology

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.

#### Step 1 - Planning

As part of the planning process, Hudbay and Safety Science had a teleconference call to confirm scope, timelines, information request and other project particulars. An information request will be made to Hudbay to provide Safety Science with the following:

- 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.)
- 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).

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>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"> <li>• a review of Hudbay's self-assessments for each of the TSM Protocols;</li> <li>• comparisons to previous self-assessment levels;</li> <li>• review any new or changed information to ensure that they meet the intent of external verification; and,</li> <li>• sampling supporting evidence that demonstrates the self-assessed level.</li> </ul> <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 verifier's 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 support the verification	<p>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 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 Constancia operations workforce population we targeted at least fifty-nine (59) interviews across executives, management / supervisor and workforce (including contractors) across the operations. We achieved our target and achieved ninety-five (95) interviews across the organizational structure with 30% being workforce interviews. We believe this was adequate considering the management system</p>

	approach across the operations, management structures and shared services and we found the interview information consistent with the self assessment information.
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
<b>Biodiversity Conservation Management</b>		
1. Corporate biodiversity conservation commitment, accountability, and communications	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>Hudbay demonstrated strong Corporate commitment demonstrated in Policy, ESG reporting, HSE Policy and site procedures</li> <li>Hudbay website includes commitment to sustainability and provides examples of biodiversity activities</li> <li>Corporate and facility programs have standards and expectations for management systems, programs</li> <li>Accountability and responsibility defined at all levels of organization</li> <li>Biodiversity action plans created with defined responsibilities</li> <li>Internal assessments verify commitment and implementation performed by Corporate and Site personnel</li> <li>Mitigation hierarchy outlined in actions plans and procedures</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> (if applicable) <ul style="list-style-type: none"> <li>Not applicable</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>Website</li> <li>Sustainability Reporting</li> <li>Standards</li> <li>HSE Policy</li> <li>Interviews with site personnel and COI</li> <li>Environmental procedures</li> <li>Biodiversity and Ecosystem Services Standard</li> </ul>
2. Biodiversity conservation planning and implementation	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>Biodiversity standard includes requirements, actions, responsibilities, reporting and inclusion of COI engagement in biodiversity activities</li> <li>Baseline data has been established to manage biodiversity aspects</li> <li>Standards have been established to define requirements, procedures, plans and responsibility</li> </ul>

		<ul style="list-style-type: none"> <li>• Biodiversity standards include objectives of no net loss and specific biodiversity objectives</li> <li>• Business plans include budgetary requirements</li> <li>• Internal assessments verify commitment and implementation performed by Corporate and Site personnel</li> <li>• Mitigation hierarchy outlined in actions plans and procedures</li> <li>• Accountability and responsibility defined at all levels of organization including environment department that has specific roles and requirements for BAP procedures and action plans</li> <li>• Studies and monitoring for environmental effects</li> <li>• Constancia Operations has a joint research agreement with a state entity, INAIGEM (National Institute for Research on Glaciers and Mountain Ecosystems) and the Conservation efforts have recently been recognized at the Congress of Mining Techniques and Innovation</li> <li>• With the wetland management plan that has been developed they are improving and conserving biodiversity and ecosystem services</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Standards</li> <li>• Interviews with site personnel and COI</li> <li>• Environmental procedures</li> <li>• Engagement and conventions records</li> <li>• Environmental monitoring studies and data</li> <li>• COI engagement records</li> <li>• Biodiversity action plans, BAP monitoring, reporting and dissemination</li> </ul>
3. Biodiversity conservation reporting	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Hudbay publishes sustainability key performance data on its website and includes wide range of information for: land, surface water, land-use etc.</li> <li>• Hudbay reports to Global Reporting Initiative (GRI) on wide range of indicators</li> <li>• Reporting on Biodiversity includes monitoring in the wetlands and dry seasons and evaluation of the state of the wetland ecosystem, including intervention strategies.</li> <li>• Historical regulatory permitting documents have included biodiversity</li> <li>• Internal assessments verify commitment and implementation performed by Corporate and Site personnel</li> <li>• Public meetings included feedback actions and company personnel at each location were present to answer questions and provide information</li> <li>• Link to information can be found: <a href="#">Hudbay Minerals Inc. - Home</a></li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Hudbay Website</li> <li>• Sustainability Report including related verification</li> <li>• Participation in Public meetings, publication of ecosystem assessment results and presentation of conferences with SERFOR (National Forest and Wildlife Service)</li> </ul>
<b>Climate Change</b>		
1. Corporate climate change management	A	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• A revised strategy, entailing a set of BU-specific targets was publicized in Hudbay's 2024 Annual Report.</li> <li>• These revisions were made primarily in response to recent anti-greenwashing provisions, limiting what can be publicly stated.</li> </ul>

		<ul style="list-style-type: none"> <li>• The corporate scorecard is part of the process related to board and management accountabilities</li> <li>• Governance and risk / opportunity details are disclosed within the Management Information Circular</li> <li>• Hudbay has been tracking and disclosing scope 1 and 2 emissions since the introductions of federal requirements</li> <li>• Hudbay has opportunities to integrate climate change into risk management activities and consideration of offsets to improve MAC TSM performance levels</li> <li>• </li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Hudbay Website</li> <li>• Sustainability Report</li> <li>• GHG Reduction Roadmap Charter</li> <li>• Tailings Risk Register Extract</li> <li>• Annual CDP Report</li> <li>• Enterprise Risk Management (ERM) files</li> <li>• Health, Safety &amp; Environment Policy</li> </ul>
2. Facility climate change management	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• EHS Policy outlines commitments and setting objectives and targets for the facility and is signed by the top management.</li> <li>• Environmental Strategy &amp; Objective Framework guides departmental level objectives</li> <li>• Numerous departmental objectives in 2025 are focusing on reduction of water consumption, fuel consumption, waste management optimization.</li> <li>• Energy and emission source (fuel, electricity) amounts are tracked on a monthly basis and the information is included in monthly environmental performance reports</li> <li>• Annual Environment Strategy &amp; Objectives Framework is formalized for setting of performance targets and stewarded during the year and reviewed as part of the annual management review</li> <li>• Energy and climate change related activities are included in public meetings updates as needed</li> <li>• Internal and external audits review the energy and GHG emissions management system procedures and calculations</li> </ul>
		<b>Identified Gaps to Achieve Level AAA</b> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Hudbay Website</li> <li>• Sustainability Report</li> <li>• GHG Reduction Roadmap Charter</li> <li>• Tailings Risk Register Extract</li> <li>• Annual CDP Report</li> <li>• Enterprise Risk Management (ERM) files</li> <li>• Health, Safety &amp; Environment Policy</li> <li>• Environmental Strategy and Objective Framework</li> <li>• Env Strategy &amp; Objective</li> <li>• Annual GHG Report and working files</li> <li>• </li> </ul>
3. Facility performance	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• <u>Hudbay Minerals Inc. - Sustainability</u></li> </ul>

targets and reporting		<ul style="list-style-type: none"> <li>• Facility level action plans are developed and implemented to align with the corporate commitment</li> <li>• Hudbay's Annual Sustainability Report covers reporting on energy use and emissions.</li> <li>• Governmental GHG Quantification Requirements provides relevant emission factors that are used for quantification</li> <li>• Performance is reported internally via meetings and monthly Environmental Performance Reports</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Hudbay Website</li> <li>• Sustainability Report</li> <li>• Annual CDP Report</li> <li>• Enterprise Risk Management (ERM) files</li> <li>• Health, Safety &amp; Environment Policy</li> <li>• Environmental Strategy and Objective Framework</li> <li>• Env Strategy &amp; Objective</li> <li>• Annual GHG Report and working files and associated Ministry audit</li> <li>• Environmental Report June 2025</li> <li>• Management's discussion and analysis of results of operations and financial conditions</li> <li>• Report of mitigation actions by certifying company in accordance with ISO 14064-1:2018 including indirect emissions and removals and indirect GHG emissions from imported energy.</li> </ul>
<b>Crisis Management and Communications Planning - CORPORATE (YES or NO)</b>		
1. Crisis Management and Communications Preparedness	Yes	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Hudbay has a Crisis Management Policy that outlines Hudbay's commitment to operational excellence</li> <li>• Hudbay maintains a Crisis Management Plan that defines protocols and overall responsibilities in a crisis situation</li> <li>• All Hudbay subsidiaries maintain emergency response plans for their operations</li> <li>• Crisis Management Policy is approved by the CEO</li> <li>• Crisis management is also an annual topic covered under the executives EHSC Management Review</li> <li>• Hudbay Crisis Management Procedure outlines and defines protocols and overall responsibilities in a crisis situation.</li> <li>• Media Spokesperson are defined and have roles and responsibilities</li> <li>• 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</li> <li>• Facilities have their own contact forms for contact numbers which also include key external media and stakeholder information</li> <li>• Hudbay has requirements for communications procedure and tracks incoming and outgoing communications.</li> <li>• All emergency related documentation is controlled as per the company's document control procedure.</li> <li>• All copies of the emergency procedures manual are available electronically using the shared drive and can be accessed through computers</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b>



		<ul style="list-style-type: none"> <li>• Crisis Management Policy</li> <li>• Crisis Communication Checklist</li> <li>• Management Review agenda</li> <li>• Crisis Management Plan</li> <li>• Confidentiality and Insider Trading Policy</li> <li>• Code of Business Ethics &amp; Conduct</li> <li>• Whistleblower Policy</li> <li>• Emergency Contact Information</li> <li>• Crisis Communication Guidance</li> </ul>
2. Review	Yes	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Huidbay document control procedures require that all documents are formally reviewed and re-approved at a minimum once every five years.</li> <li>• Huidbay procedures include updates to the documents be made when there is a personnel change</li> <li>• 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</li> <li>• Emergency Contact Information was demonstrated as recently being updated</li> <li>• Crisis management team members were involved as part of recent situations with wildfires in 2025</li> <li>• ESG Steering Committee took a break from scheduled agenda to discuss impacts of the evacuation</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Interviews with Corporate Crisis Management Team members including Chief Operating Officer</li> <li>• Crisis Management Policy</li> <li>• Crisis Communication Checklist</li> <li>• Management Review agenda</li> <li>• Crisis Management Plan</li> <li>• Confidentiality and Insider Trading Policy</li> <li>• Code of Business Ethics &amp; Conduct</li> <li>• Whistleblower Policy</li> <li>• Emergency Contact Information</li> <li>• Crisis Communication Guidance</li> <li>• Post Crisis Lessons Learned Report – 2024</li> </ul>
3. Training	Yes	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Huidbay demonstrated review and training of the Crisis and Emergency plans through wildfires in Manitoba this past summer 2025</li> <li>• Fires required an evacuation of both Flin Flon and Snow Lake in June, and a few weeks later a second evacuation of Snow Lake.</li> <li>• Crisis team was, and continues to be, fully engaged, and alerted the corporate crisis team who enacted their plan</li> <li>• Huidbay shut operations down in advance of the Snow Lake evacuation.</li> <li>• Site team executed their crisis management processes and, when necessary, escalated the situation to Corporate</li> <li>• Corporate team was provided with regular updates by the BU and as the situation progressed this led to communications company-wide and externally</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>

		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Interviews with Corporate Crisis Management Team members including Chief Operating Officer</li> <li>• Interviews with facility emergency management personnel</li> <li>• Crisis Management Policy</li> <li>• Crisis Communication Checklist</li> <li>• Management Review agenda</li> <li>• Crisis Management Plan</li> <li>• Emergency Contact Information</li> <li>• Crisis Communication Guidance</li> <li>• Post Crisis Lessons Learned Report – 2024</li> </ul>
<b>Crisis Management and Communications Planning - FACILITY (YES or NO)</b>		
1. Crisis Management and Communications Preparedness	Yes	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Huidbay Peru has identified Potential Emergencies within their Crisis Manual that identifies the following key subject areas have been covered: Natural disasters, stoppages, strikes, access blockades, seizure of an installation by members of the community, on transport routes, accidents involving the transport of hazardous substances, paralysis of operations due to the takeover of the installation by workers, involuntary retention and kidnapping of officials, changes in legislation with a negative impact on the operation.</li> <li>• The Manual identifies potential emergencies as well as the associated impacts and controls – references include appropriate portions of emergency procedures/manuals.</li> </ul> <b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul> <b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Manual de crisis</li> <li>• Crisis Management Team CMT Activation Protocol</li> <li>• Functions of the CMT</li> <li>• Resources for the CMT and the crisis command center of Lima, Cusco and UM Constancia</li> <li>• Risk management procedure</li> <li>• Stakeholder management procedure</li> <li>• Media monitoring procedure</li> <li>• Spokesperson procedure</li> <li>• Crisis communication procedure</li> <li>• Contact data records of main supplier companies</li> <li>• Emergency Response Plan (ERP) of the TMF Constancia, with the 4 levels of emergency, crisis management and communications.</li> <li>• Directory of internal and external contacts</li> <li>• TMF Emergency Preparedness Plan (EPP) Constancia</li> </ul>
2. Review	Yes	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• The manual is reviewed annually, and updates have been made to the CMT contacts, media, vendor and institutional contacts</li> <li>• This year the crisis committee is activated due to invasion and for the occupation of strategic roads to harm the transport of minerals, for protests to the Peruvian state to prolong the REINFOP (Registry of Mining Formalization) convened by the National Federation of Informal Miners.</li> <li>• CMT (corporate) activation due to invasion, announcing the suspension of operations, operational personnel and mobile teams were evacuated as part of the strategy and announcing the gradual reestablishment of operations.</li> <li>• Minutes of the Crisis Management team are generated with the periodic report of activities to the members of the CMT and Post-Crisis</li> </ul>

		<p>evaluation including the strengths of the response to the crisis and actions to be improved.</p> <ul style="list-style-type: none"> <li>• Management at the corporate office being made aware in real time of actual crises with the CMT:</li> <li>• TEAM meetings by CMT demonstrated communication and updates of the situation. Messages of support for the strategy indicated by the CMT were disseminated and internal messages were disseminated to employees. Effective coordination was carried out with the authorities MINEM, Ministry of Energy and Mines, PNP, National Police and PCM, Presidency of the Council of Ministers.</li> </ul>
		<p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Manual de crisis</li> <li>• Crisis Management Team CMT Activation Protocol</li> <li>• Functions of the CMT</li> <li>• Resources for the CMT and the crisis command center of Lima, Cusco and UM Constancia</li> <li>• Risk management procedure</li> <li>• Stakeholder management procedure</li> <li>• Media monitoring procedure</li> <li>• Spokesperson procedure</li> <li>• Crisis communication procedure</li> <li>• Contact data records of main supplier companies</li> <li>• Emergency Response Plan (ERP) of the TMF Constancia, with the 4 levels of emergency, crisis management and communications.</li> <li>• Directory of internal and external contacts</li> <li>• TMF Emergency Preparedness Plan (EPP) Constancia</li> </ul>
3. Training	Yes	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Huidbay demonstrated an actual crisis / emergency response during the crisis committee is activated for the occupation of strategic roads to harm the transport of minerals, for protests to the Peruvian state to prolong the REINFOP (Registry of Mining Formalization) convened by the National Federation of Informal Miners in the region occurring in 10/2025</li> <li>• As above, conducting a full crisis simulation exercise was unnecessary this year due to the actual crisis.</li> </ul>
		<p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Manual de crisis</li> <li>• Crisis Management Team CMT Activation Protocol</li> <li>• Functions of the CMT</li> <li>• Resources for the CMT and the crisis command center of Lima, Cusco and UM Constancia</li> <li>• Risk management procedure</li> <li>• Stakeholder management procedure</li> <li>• Media monitoring procedure</li> <li>• Spokesperson procedure</li> <li>• Crisis communication procedure</li> <li>• Contact data records of main supplier companies</li> <li>• Emergency Response Plan (ERP) of the TMF Constancia, with the 4 levels of emergency, crisis management and communications.</li> <li>• Directory of internal and external contacts</li> <li>• TMF Emergency Preparedness Plan (EPP) Constancia</li> </ul>

<b>Indigenous and Community Relationships</b>		
1. Community of Interest (COI) Identification	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>Hudbay has a comprehensive Stakeholder Engagement Program and is formalized through a set of Standards and Procedures</li> <li>Hudbay Stakeholder Engagement include: <ul style="list-style-type: none"> <li>identification and engagement of its stakeholders</li> <li>appropriately incorporates understanding of stakeholder perspectives in Hudbay plans and activities.</li> <li>identify stakeholders interested in or affected by projects/operations within a region and document the results in a stakeholder register.</li> <li>review and build from existing studies and desk-based research</li> <li>define local and regional stakeholders with direct or indirect interests (and if appropriate indigenous or other minorities)</li> <li>Engage personnel from a range of functions in the identification process (e.g. operations, community relations, health and safety, environment, human resources, procurement), and</li> <li>Ask known stakeholders if there are others that should be included in the identification process</li> </ul> </li> <li>Constancia has developed a site procedure Stakeholder Management to apply at a local level and includes requirements, roles and responsibilities</li> <li>Constancia demonstrated active encouragement of community identification of stakeholders, with the offices, bilateral assemblies with the representatives of the communities, and residents, permanent offices of attention in the most representative communities, informative workshops, suggestion boxes and registration and follow-up of Communications with the COIs.</li> <li>Hudbay has digitalized to manage COI and Indigenous contact information</li> <li>Hudbay 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</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>Stakeholder Management Procedure</li> <li>Local Procurement and Employment Standard</li> <li>Stakeholder Engagement Guidance</li> <li>Community Response Mechanism Standard</li> <li></li> <li>Communication and consultation procedure</li> <li>Acta de actualization de stakeholders</li> <li>Quarterly Matrix of Stakeholders Mapping</li> <li>Report Matrix Assemblies</li> <li>Community Relations procedure</li> </ul>
2. Effective COI Engagement and Dialogue	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>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</li> </ul>

		<ul style="list-style-type: none"> <li>• Attention is provided in permanent and itinerant information offices, where consultations, orders, entry of documents and complaints or claims are registered. In addition, there are communications in Spanish and Quechua through news bulletins and radio announcements. Public meetings and participatory monitoring are developed.</li> <li>• COIs are invited to participate in joint decision-making on agreed matters that directly affect and/or have an interest through the communal assemblies.</li> <li>• The agreements are followed up in minutes that are reviewed in the periodic meetings held with the community where the effectiveness of the actions taken as agreements is evaluated. When there are deviations from the commitments, the organization has procedures where non-conformities are recorded, the causes are analyzed and actions are proposed to evaluate the effectiveness of the closure.</li> <li>• Public information includes the effectiveness of the actions taken, such as information bulletins that publish the actions taken in which the inhabitants are satisfied.</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Stakeholder Management Procedure</li> <li>• Local Procurement and Employment Standard</li> <li>• Stakeholder Engagement Guidance</li> <li>• Community Response Mechanism Standard</li> <li>• Communication and consultation procedure</li> <li>• Stakeholder Update Minutes</li> <li>• Quarterly Matrix of Stakeholders Mapping</li> <li>• Report Matrix Assemblies</li> <li>• Community Relations procedure</li> </ul>
3. Effective Indigenous Engagement and Dialogue	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Hudbay Standard Stakeholder Engagement has processes to engage in dialogue with indigenous communities</li> <li>• Processes follow key steps of: Identify, Understand, Plan, Engage, Respond</li> <li>• Indigenous groups are invited to public meetings held in each critical community.</li> <li>• Traditional decision-making processes are incorporated through the free election of their community representatives</li> <li>• Engage personnel from a range of functions in the identification process (e.g. operations, community relations, health and safety, environment, human resources, procurement)</li> <li>• Hudbay demonstrated comprehensive processes to engage in dialogue with indigenous communities</li> <li>• Among the projects developed with the communities in order to empower them, there is the creation of communal enterprises for the transport of concentrate.</li> <li>• As part of the traditional processes, there are seed planting projects for tree planting projects during mine closure.</li> <li>• Internally, the communities have elections of their representatives who are elected every two years and who carry out agreements with the community and are transmitted to the Minea unit for negotiation.</li> <li>• There are programs to disseminate the cultural aspects of communities, traditions and rituals. It is supported by its internal and external diffusion.</li> </ul>

		<ul style="list-style-type: none"> <li>If the conflicts cannot be resolved in the assemblies and dialogue tables, the next step is the complaint process</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>Stakeholder Management Procedure</li> <li>Local Procurement and Employment Standard</li> <li>Stakeholder Engagement Guidance</li> <li>Community Response Mechanism Standard</li> <li>Communication and consultation procedure</li> <li>Acta de actualization de stakeholders</li> <li>Quarterly Matrix of Stakeholders Mapping</li> <li>Report Matrix Assemblies</li> <li>Community Relations procedure</li> </ul>
4. Community Impact and Benefit Management	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>Hudbay Stakeholder Standard includes process for impact and benefit management</li> <li>Process to engage with local COI is described within Hudbay Local Procurement and Employment Standard</li> <li>There are employability indicators, contracting of services to the communities, projects such as activities, river cleaning, training of first aid, peasant patrols.</li> <li>There is a risk matrix, by communities, Analysis and management of Social Risk. It includes activities that may be compromised, there are indicators of alerts and mitigation measures.</li> <li>There are different actions taken to mitigate the risk of complaints from the communities such as, Construction of water catchments to guarantee the volume of water to the communities, monitoring every 6 months of infrastructure, near or adjacent to the pit; Hydrological monitoring, quality and quantity of river water are in place to prevent overflow; irrigation of roads internal and external to the communities to mitigate adverse impacts such as the generation of dust</li> <li>The main efforts are focused on women. This is demonstrated by entries in the stakeholder matrix, specific programmes and public reports on these programmes</li> <li>The Works for Works for Taxes program (the state's program to do community work and reduce taxes) supports jointly identified infrastructure needs that, once established, are intended to become self-sustaining (e.g., Integrated Health Network for all community health facilities).</li> <li>Several examples of publications, such as the Community Contractor program, aim to grow sustainable businesses in local communities</li> <li>A consulting report on social projects and compliance includes information on the economic development of the communities such as the management of concentrate transport by a community, showing the operational results of the community enterprise and the performance of occupational health and safety and business growth, projects in the construction of sheds for cattle feed, installation of solar panels for energy generation, improvement of the production of alpacas and Andean camelids through the implementation of female reproductive modules in the community, change of posts of cattle fences, metal hypostases and meshes for cattle farms. Medical center was implemented with services such as general medicine, early stimulation, tuberculosis module, HIV and AIDS prevention module, for the local population.</li> </ul>
		<b>Identified Gaps to Achieve Level A</b>

		<ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Stakeholder Management Procedure</li> <li>• Annual Sustainability Report (ASR)</li> <li>• Local Procurement and Employment Standard</li> <li>• Stakeholder Engagement Guidance</li> <li>• Communication and consultation procedure</li> <li>• Stakeholder Update Minutes</li> <li>• Quarterly Matrix of Stakeholders Mapping</li> <li>• Report Matrix Assemblies</li> <li>• Community Relations procedure</li> </ul>
5. COI Response Mechanism	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Hudbay Communications and Stakeholder Engagement Procedure outlines a formal complaint system for managing external issues and grievances</li> <li>• Hudbay monitors COI concerns and engagement mechanisms and through the tracking in software</li> <li>• Public meetings include feedback during the meeting, COI to contact Hudbay and make inquiries and feedback</li> <li>• There is a procedure for managing claims and complaints, which includes communication to the COI, analysis and proposed actions until the agreement of the COI. There are also procedures for escalating actions in case of non-conformity with results.</li> </ul> <b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul> <b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>•</li> <li>• Community Response Mechanism Standard</li> <li>• Communication and consultation procedure</li> <li>• Stakeholder Update Minutes</li> <li>• Quarterly Matrix of Stakeholders Mapping</li> <li>• Report Matrix Assemblies</li> <li>• Community Relations procedure</li> </ul>
<b>Preventing of Child and Forced Labour (Indicate YES or NO)</b>		
1. Preventing Forced Labour	Yes	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Hudbay's Constancia operation is committed to the prevention of child labour and forced labour across its workforce and supply chain, in alignment with Peruvian law, ILO Conventions, and Hudbay corporate policies</li> <li>• Constancia operates in accordance with Hudbay's Human Rights Policy, which explicitly prohibits child labour and all forms of forced, bonded, or involuntary labour</li> <li>• Identity and age verification are required during recruitment and onboarding.</li> <li>• Employment is voluntary, with no retention of identity documents, deposits, or coercive practices.</li> <li>• Employees are free to terminate employment in accordance with legal notice requirements.</li> <li>• Contractors and service providers must comply with Hudbay's Code of Business Conduct and Human Rights standards.</li> <li>• Contractual clauses prohibit child labour and forced labour</li> <li>• Constancia aligns site-level controls with Hudbay corporate oversight and governance</li> </ul>

		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Huidbay Website</li> <li>• Huidbay Sustainability Report</li> <li>• Huidbay Disclosure policies and documents</li> <li>• Huidbay interviews with key contacts</li> </ul>
2. Preventing Child Labour	Yes	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Huidbay maintains hiring practices to validate identify of persons during hiring processes</li> <li>• Don't hire under age of 18, mine regulations and Peruvian regulation</li> <li>• Background checks are performed based on valid ID, passport, driver licence and includes combination of criminal check, certificates education</li> <li>• Validation part of the contracting process to ensure regulatory requirements are followed by contractors</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Huidbay Website</li> <li>• Huidbay Sustainability Report</li> <li>• Huidbay Disclosure policies and documents</li> <li>• Huidbay interviews with key contacts</li> <li>• Huidbay's Human Rights Policy</li> <li>• Huidbay's Code of Business Conduct and Human Rights standards.</li> <li>• Records of training on human rights</li> <li>• Global Supplier Due Diligence Policy</li> <li>• Vendor onboarding and supplier management processes</li> <li>• Human Rights Policy</li> <li>• Code of Business Conduct and Ethics</li> </ul>
<b>Safety and Health</b>		
1. Commitments and Accountability	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• Huidbay has a long standing certification to ISO45001 and has internal and external audits <ul style="list-style-type: none"> <li>• <u>Huidbay has used the TSM H&amp;S Abridged External Checklist for the TSM self assessment</u></li> </ul> </li> <li>• Huidbay 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.</li> <li>• Huidbay 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</li> <li>• Huidbay 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."</li> <li>• To ensure that safety is a living part of our daily operations, the management systems at all of our 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</li> </ul>



		<p>verifications ensure our operations remain in compliance with TSM standards and protocols throughout the life of the operation.</p> <ul style="list-style-type: none"> <li>• Highbay 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 VFL's (visible field leadership)– aim to support supervisors in effectively engaging with their teams so that everyone understands the risks associated with tasks and the work environment. Ultimately, the goal is zero harm – with no fatalities and no injuries.</li> <li>• Highbay demonstrate a comprehensive health and safety management system with clearly defined roles and responsibilities</li> </ul>
		<p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Health Safety and Environment Policy</li> <li>• Internal audit report</li> <li>• External audit report and summary</li> <li>• Remote Visible Leadership (VRL) FORM</li> <li>• Occupational Health and Safety Inspections</li> <li>• Monitoring of inspections through the Safety App.</li> <li>• Specific Safe Work Procedures</li> <li>• Annual training program</li> <li>• Internal regulations on occupational safety and health</li> </ul>
2. Planning and Implementation	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Highbay demonstrated a comprehensive health and safety management system that includes identification of high consequence hazards, and related controls</li> <li>• Monitoring of psychosocial agents and sexual harassment. Healthy company program, Healthy workplace model for the creation of healthy work environments for employers, workers.</li> </ul>
		<p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Internal audit report</li> <li>• External audit report and summary</li> <li>• Annual Sustainability Report</li> <li>• Visible Felt Leadership</li> <li>• VFL Tracking Report</li> <li>• Certificates of recognition as healthy business management</li> <li>• Annual occupational safety and health programme</li> <li>• Specific Safe Work Procedures</li> <li>• Hazard and risk matrices and controls.</li> <li>• Critical Controls Verification Guide.</li> </ul>
3. Training, Behaviour and Culture	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Mental health support programs, including Highbay Peru has a program called BSK (Beyond Sumaq Kausay), which consists of activities that promote well-being and mental health and healthy lifestyles. In addition, there is a medical surveillance program for healthy lifestyles. The program includes definitions of respectful behaviours.</li> <li>• There is a program of mental health and healthy living activities</li> </ul>

		<ul style="list-style-type: none"> <li>There is communication from HR is referred to a specialist psychological emergencies, stress management, There is a telephone to access psychological support, whatsapp, PEACE portal communication by mail that includes work well-being, feeling good, healthy finances. There is a Welfare Portal. External supplier and local professionals. Psychological care 24/7 attention for employees and family members. There is also a psychological emergency for immediate action.</li> <li>Mult-track training schedule (includes alcohol &amp; drug policy, harassment / respectful workplace, employee benefits, mental health first aid, etc)</li> <li></li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>Internal audit report</li> <li>External audit report and summary</li> <li>Visible Felt Leadership</li> <li>VFL Tracking Report</li> <li>Management Review Presentation</li> </ul>
4. Monitoring and Reporting	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>Hudbay demonstrated monitoring and reporting processes, tracking, communication and external reporting through the 2024 Annual Sustainability Report – Report safety performance metrics to ICMM standards.</li> <li>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:</li> <li>TRIF / Lost time severity</li> <li>Hudbay uses methodologies for incident investigation including ICAMs</li> <li>High Potential Incident reviews are performed</li> <li>Field risk assessments are carried out and there is a threshold to stop work to add controls before starting work again</li> <li>SIF program is based on a focus of critical controls.</li> <li>Hudbay demonstrated audits with a focus on aspects and critical controls</li> <li>Behavior management includes training programs to reinforce behaviors, review of work procedures, field accompaniment of observers, observation of leaders providing support and recognition to outstanding observers.</li> </ul> <p><u>Hudbay Minerals Inc. - Sustainability - Health and Safety</u></p> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>Internal audit report</li> <li>External audit report and summary</li> <li>Annual Sustainability Report</li> <li>Visible Felt Leadership</li> <li>VFL Tracking Report</li> <li>Management Review Presentation</li> </ul>
5. Performance	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>Hudbay had zero (0) fatalities in 2024</li> </ul>

		<ul style="list-style-type: none"> <li>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</li> <li>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&amp;P, ISS, Sustainalytics, Corporate Knights, etc.)</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>Internal audit report</li> <li>External audit report and summary</li> <li>Annual Sustainability Report</li> <li>VFL Tracking Report</li> <li>Management Review Presentation</li> </ul>
<b>Tailings Management</b>		
1. Tailings management policy and commitment	AA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>Hudbay's Tailings Management System Policy, signed by the General Manager Hudbay Peru.</li> <li>The Tailings Management System Manual specifies the allocation of Human and Financial Resources to support tailings management</li> <li>A budget is prepared annually to cover the requirements for construction, engineering, instrumentation</li> <li>Emergency Preparedness Plan encourages a Training Plan.</li> <li>External evacuation drills are carried out in the event of events that compromise the stability and integrity of the dam</li> <li>The Tailings Governance Statute of the corporation where the responsibilities, functions and accountability are detailed and define the Accountable Executive (AE) the Chief Operating Officer (COO).</li> <li>Assistantships twice a year, with the IPRB (incl. EoR). In the audits, the IPRB and the EOR report to the AE and the management of Constancia the responsible management of the tailings</li> <li>Staff report their concerns and follow up on tailings management committees which are monthly.</li> <li>There are meetings with the IPRB (Comité Tecnico Revisor Independiente) on a biannual basis</li> <li>Drills are scheduled and executed to validate emergency response plans and action plans for identified improvements.</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>Emergency Preparedness Plan</li> <li>Training Plan.</li> <li>Emergency Response Plan</li> <li>Handbook Organigram</li> <li>Manual Responsabilidades</li> <li>IPRB (Independent Technical Review Committee) Constancia Report</li> <li>PPE Emergency Preparedness Plan</li> <li>Tailings Management System Manual</li> <li>Emergency Response Plan</li> <li>Matrix RACI and contract manual.</li> <li>Drill reports</li> </ul>

2. Assigned accountability and responsibility for tailings management	AA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Tailings Governance Charter, details key people, governance team, corporate reviews, defines the Executive responsible for accountability and approving the Accountable Executive (AE), key third-party functions incident reporting, and EHSS and technical committee registration. The Engineer of Record (EoR) and the Independent Technical Review Committee (ITRB) are defined</li> <li>• Different internal and external reviews are carried out to validate existing controls and designs such as Dam Safety Review – Tailing Management Facility, Meeting Independent peer review board (IPRB), Annual safety inspection and engineer of record report, Inspection Act by the Mining and Energy Supervisory Body</li> <li>• There are inspections by the EoR and semi-annual reports of the instrumentation Report review, Review of Constancia Seismic Hazard Assessment</li> <li>• There is a monthly report on mine management, tactical and strategic mine planning TMF 2025 and LOM Plan HCW Constancia weekly plans are available</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Tailings Governance Statute</li> <li>• Emergency Preparedness Plan</li> <li>• Training Plan.</li> <li>• Emergency Response Plan</li> <li>• Handbook Organigram</li> <li>• Manual Responsabilidades</li> <li>• IPRB (Independent Technical Review Committee) Constancia Report</li> <li>• PPE Emergency Preparedness Plan</li> <li>• Tailings Management System Manual</li> <li>• Emergency Response Plan</li> <li>• Matrix RACI and contract manual.</li> <li>• Drill reports</li> <li>• Annual safety inspection and engineer of record report</li> <li>• Inspection report by the supervisory body of energy and mining.</li> <li>• Dam Safety Review – Tailing Management Facility</li> <li>• Meeting Independent peer review board (IPRB)</li> <li>• Internal and external audit reports</li> <li>• Independent review report of the TMF Constancia Hudbay by independent evaluator.</li> <li>• Tailings Management Committee Minutes.</li> <li>• Monitoring of risk management of civil works in tailings management</li> </ul>
3. Tailings management system and emergency preparedness	AA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Risk identify as Earthquakes, floods, landslides or avalanches</li> <li>• The Risk Management Plan is updated annually.</li> <li>• Currently, the IPRB recommended in 2024 and 2025 to reevaluate the evaluation matrix at the corporate level. Therefore, the Risk Management Plan will be updated after defining the corporate matrix</li> <li>• Se tiene plan de gestión de riesgos del TMF Constancia, Plan anual de simulacros y programa anual de capacitaciones para brigadas los cuales se vienen llevando periódicamente y se toma acciones para cerrar brechas</li> <li>• Si tiene evaluación de riesgos y checklist de controles para eliminar o reducir los riesgos defectos respuestas y minimizar consecuencias</li> <li>• The report and evaluation of performance, deficiencias, action plan schedules and follow-up on the implementation of critical controls is presented in the Tailings Committee</li> </ul>

		<ul style="list-style-type: none"> <li>• - It is also presented to the IPRB, since the board makes recommendations and follows up on critical controls</li> <li>• The EOR is also actively reviewing critical controls. They are currently maintained as presented in the Manual, however, in September 2025 the IPRB presented a re-evaluation of the definition of critical controls that was well received by the IPRB. It is currently in the process of implementation and approval and then incorporated into the next version of the Manual</li> <li>• The Tailings Management System Manual details the objectives in section 3.3. These objectives are based on Hudbay's Policies and Commitments.</li> <li>• "The indicators are developed for the entire life cycle in section 3.3</li> <li>• They are also detailed in the Manual</li> <li>• The budgets are prepared by the Managers of the UM Constancia linked to the TMF. Every</li> <li>• The management has a specific deadline for delivery to the General Management for approval. Finally, the General Management has the task of supporting the budgets before the Hudbay Central Office (Toronto, Canada). Budgets are drawn up on an annual basis</li> </ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"> <li>• Annual training program</li> <li>• Tailings Management System Manual Limites.pdf</li> <li>• Tailings Management Statute sistemas.pdf Relationship</li> <li>• Risk Management Plan 2024</li> <li>• Risk Management Plan 2024 Results.</li> <li>• Risk Management Plan 2024 Controls</li> <li>• "IPRB Constancia Report "</li> <li>• Tailings Governance Statute</li> <li>• Emergency Preparedness Plan</li> <li>• Training Plan.</li> <li>• Emergency Response Plan</li> <li>• Handbook Organigram</li> <li>• Manual Responsabilidades</li> <li>• IPRB (Independent Technical Review Committee) Constancia Report</li> <li>• PPE Emergency Preparedness Plan</li> <li>• Tailings Management System Manual</li> <li>• Emergency Response Plan</li> <li>• Matrix RACI and contract manual.</li> <li>• Drill reports</li> <li>• Annual safety inspection and engineer of record report</li> <li>• Inspection report by the supervisory body of energy and mining.</li> <li>• Dam Safety Review – Tailing Management Facility</li> <li>• Meeting Independent peer review board (IPRB)</li> <li>• Internal and external audit reports</li> <li>• Independent review report of the TMF Constancia Hudbay by independent evaluator.</li> <li>• Tailings Management Committee Minutes.</li> <li>• Monitoring of risk management of civil works in tailings management</li> </ul>
4. Operation, maintenance, and surveillance	AA	<b>Summary of Findings</b> <ul style="list-style-type: none"> <li>• There is an annual tailings maintenance plan, critical spare parts have been identified and a maintenance OMS manual has been generated.</li> <li>• The Operation and Maintenance and Inspection and Monitoring (OMS) Manual of the Tailings Deposit, includes the evaluation of reports and</li> </ul>

		<p>documentation where the objectives of the preparation of the documentation report are detailed, procedures for the evaluation of reports and documentation, documents and records generated during the maintenance and inspection operations of the TMF.</p> <ul style="list-style-type: none"> <li>• TMF Safety Review Program Review and Update of the WHO Manual</li> <li>• There is an OMS manual for inspection and monitoring, as part of the operations, maintenance, inspection and monitoring manual of the Constancia tailings deposit.</li> <li>• Routine and non-routine inspections such as maintenance are included and reported to the EoR or its QA team field representative.</li> <li>• Inspections in case of external events such as seismic events or precipitation events.</li> <li>• Independent technical inspections are also considered, there is a program of virtual meetings at least 2 times a year and an annual visit to the unit with the entire team to inspect the construction and operation works of the main structures such as TMF and the WRF.</li> <li>• Monitoring of geotechnical and topographic instruments as part of critical controls And the use of key instruments and equipment for measurement such as piezometer stopped open or tilted meters, prisms and settlement plates, accelerographs among others.</li> <li>• Within the OMS operation, maintenance, inspection and monitoring manual, there is a maintenance section that includes maintenance of roads, diversion channels and safety berms, maintenance of the geomembrane lining, spectator maintenance, transport maintenance and replacement of tailings, among others.</li> <li>• The program and records are included in the organization's document system</li> </ul>
		<p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
		<p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Operation manual maintenance inspection and monitoring of the tailings deposit constancy</li> <li>• Governance Handbook</li> <li>• Operation Manual</li> <li>• Procedure (PETS)</li> <li>• Personnel access and exit control</li> <li>• Maintenance Manual</li> <li>• Training, Awareness and Competence</li> <li>• Handbook Reporting Documentation</li> <li>• Inspection and Monitoring Manual</li> <li>• Relationship of the ERP with the Manual</li> </ul>
5. Annual tailings management review	AA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• The scope of the Annual Independent Review, prepared by Lara Consulting, covers the critical elements related to the Tailings Management System and the installation.</li> <li>• The independent review report of the TMF Constancia.</li> <li>• The status of the recommendations of the previous review document includes the follow-up of implemented recommendations</li> <li>• There is a report from the tailings management committee.</li> <li>• Update of the Response Plans (TARPs) and the TMF water balance model. It includes the status of the recommendations issued and their follow-up.</li> <li>• There is a Geologica-Geotechnical Mapping and Foundation Approval Protocol, and results.</li> <li>• There are critical controls of the TMF Constancia As part of the civil design:</li> </ul>

		<ul style="list-style-type: none"><li>TARPs are described in detail in the Response Plan to Emergency Response Plan (ERP) which is a separate document from the Operation manual maintenance inspection and monitoring Manual;</li><li>It is evidenced in tailings committee minute records, independent review report, risk management plan, the manuals or more of the responsibilities, organizational chart and trainings, in addition to the tailings management system manual, continuous improvement and risk management, as well as performance, in addition to the Tailing Governance Charter.</li></ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"><li>None</li></ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"><li>Independent review of the TMF CONSTANCIA - HUSBAY</li><li>Evidence of Communication</li><li>Tailings Management Committee</li><li>Tailings Management Committee</li><li>Evidence of Communications</li><li>IPRB reports</li><li>Status of recommendations Previous follow-up and independent review of the TF Constancy</li></ul>
<b>Water Stewardship</b>		
1. Water Governance	AAA	<b>Summary of Findings</b> <ul style="list-style-type: none"><li>Hudbay's Health, Safety and Environment Policy includes a commitment on Caring for the environment and avoiding adverse effects on the environment and communities in the area, signed by the General Manager</li><li>Environmental Requirements Register is intended to capture all regulations applicable to Constancia facilities including water regulations.</li><li>All employees, contractors and visitors are trained in the Health, Safety and Environment policy</li><li>Hudbay's Employee/Contractor Orientation outlines the commitment to reducing reliance on fresh water and minimizing any harmful impact on local water resources.</li><li>Hudbay demonstrated water management communication to COI and indigenous groups through Participatory monitoring, reporting of the results of OEFA (Environmental Inspection Agency) type audits and reports to the Water Advisory Council of the Alto Apurimac Interregional Basin..</li><li>Annual Sustainability Report includes a water usage assessment and whether Hudbay's water stewardship practices remain compliant with relevant regulations.</li><li>Legal compliance control processes include George software and OEFA-type environmental/legal audits</li><li>The Management of Business Risks and Opportunities, which is updated quarterly on a corporate basis, includes risks related to water management, which are evaluated and preventive and corrective actions are taken as appropriate</li><li>ANA Water Footprint Audit (Blue Certificate), OEFA type audits twice a year in dry season and water season.</li></ul>
		<b>Identified Gaps to Achieve Level A</b> <ul style="list-style-type: none"><li>None</li></ul>
		<b>Examples of Evidence Consulted</b> <ul style="list-style-type: none"><li>Internal Audit Report</li><li>Management Review</li><li>Health Safety and Environment Policy</li></ul>

		<ul style="list-style-type: none"> <li>Blue Footprint Report, Final Report-Blue Certificate</li> </ul>
2. Operational Water Management	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>Hudbay demonstrated comprehensive water management activities including procedures, roles, responsibilities, tracking of data etc.</li> <li>The risks are identified in the chapter on Characterization of Environmental Impacts of the Third Modification of the Detailed Environmental Impact Study (Third MEIAd) of the Constanica Mining Unit (U.M)</li> <li>The Management of Business Risks and Opportunities, which is updated quarterly on a corporate basis, includes risks related to water management, which are evaluated and preventive and corrective actions are taken as appropriate.</li> <li>The monitoring databases, which are reported monthly to the corresponding authorities.</li> <li>The business risk matrix, which includes water management risks, has corrective actions that have been implemented and are being tracked</li> <li>Contingency plan includes risks in the mine, material deposits such as the failure of the MSP dam, or alteration of groundwater due to the failure of the seepage control system</li> <li>The Environment Committee is used to generate opportunities for improvement in water management and is held on a monthly basis</li> <li>There is a Hydrogeological study that shows the cone of depression, and the corresponding mitigation measures</li> <li>Continuous groundwater monitoring is described in the environmental strategy plan and procedure.</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>Internal/external Audit Report</li> <li>Environmental Monitoring Plan</li> <li>Environmental monitoring reports, including hydrobiological monitoring, monitoring of water levels with datalogger, water quality monitoring, monitoring of soils, organic soil piles and sediments</li> <li>Water Quality Model of Receiving Bodies</li> <li>Contingency Plan</li> <li>Annual Environmental Report 2024</li> <li>Risk matrix in tailings management</li> <li>Matrix of environmental aspects and challenges</li> </ul>
3. Watershed-scale Planning	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>A framework agreement is established between the National Institute for Research on Glaciers and Mountain Ecosystems and Huawei Peru to promote scientific research and exchange of knowledge and specialized training with emphasis on the eco-hydrobiological monitoring of wetlands and the ecological evaluation of recovery areas within the area of influence of the mining unit.</li> <li>Mine closure management plan approved by the Ministry of Energy and Mines</li> <li>There is an informative brochure for the community on the environmental controls of the mining unit, as well as the identification of communities of interest.</li> </ul> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>Internal Audit Report</li> </ul>



		<ul style="list-style-type: none"> <li>• Framework agreement between inter-institutional cooperation between the National Institute for Research on Glaciers and Mountain Ecosystems and Hudbay Peru</li> <li>• On the part of community relations and participatory environmental monitoring, it is analyzed which of the relevant communities in relation to water and hydrobiology</li> <li>• The environmental monitoring plans and procedures include the identification of responsibilities which are shared with all workers involved</li> <li>• Hudbay Peru is a member of the Technical-Driving Committee for the formation of the Upper Apurimac Basin Council</li> <li>• Hudbay obtained the Water Footprint certification by the National Water Authority</li> <li>• Promotion of participatory monitoring to COIs and records of attendance at air and water monitoring</li> <li>• Twice-year-long hydrobiological monitoring of specific points of account.</li> </ul>
4. Water Reporting and Performance	AAA	<p><b>Summary of Findings</b></p> <ul style="list-style-type: none"> <li>• Water use is included in the Annual Sustainability Report.</li> <li>• There are KPIs that measure environmental performance in relation to water</li> <li>• The environment team tracks key performance indicators and associated measures. Progress is reported monthly to the environmental committee and semi-annually in the management review</li> <li>• The public reports can be found on the website of the Ministry of Energy and Mines. The results are also published in the annual Sustainability Report and in the Environmental Management Strategy Report, which can be requested by access to information from the Ministry of Energy and Mines</li> <li>• The water data contained in the quarterly compliance reports are compiled from a laboratory certified and accredited by public institutions</li> </ul> <p><u>Hudbay Minerals Inc. - Sustainability - Environment</u></p> <p><b>Identified Gaps to Achieve Level A</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul> <p><b>Examples of Evidence Consulted</b></p> <ul style="list-style-type: none"> <li>• Hudbay Website</li> <li>• Hudbay Sustainability Report</li> <li>• Internal Audit Report</li> <li>• Dissemination of monitoring results</li> <li>• Environmental Management Strategy</li> <li>• Participatory environmental monitoring, attendance list, invitation letters, surveys of communities and representatives and photographic evidence</li> </ul>

#### 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	Due to Peru national civil unrest, a site visit by the regional verifier was not able to occur. We performed additional sampling and testing through document reviews and interviews to ensure reliable verification results.
Date of statement of verification	10 December 2025
Signature of lead verifier	