

TSM Verification Report

Facility Information

Name of company	Elk Valley Resources
Name of facility	Greenhills Operations
Address	V0B 1H0
Country of operation	Canada
Products/metals produced on site	Steelmaking Coal
Types of operations included in scope:	
Mining	<input checked="" type="checkbox"/>
Milling	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Hydrometallurgical	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Other (<i>please explain</i>)	
Types of infrastructure included in scope:	
Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	N/A
Overview of Operations	Greenhills is an open-pit operation using truck-and-shovel mining techniques. It produces steelmaking coal (metallurgical coal), which is exported globally, mainly to Asia-Pacific markets. Coal is transported by rail to Vancouver terminals and shipped overseas.

Verifier Information

Name of lead verifier	Rosanne Camacho
Verification firm	ERM CVS
Confirmation that all verifiers involved in the verification are accredited TSM verifiers	Yes
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	17/11/2025 – 21/11/2025
Verification period	2023-2025

Verification Process

Summary of the verification methodology	<ul style="list-style-type: none"> The auditors followed standard principles of auditing with an objective, evidence-based approach as outlined in ISO
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	<p>19011:2018, Guidelines for Auditing Management Systems. Professional judgment was used during the verification of the evidence presented.</p> <ul style="list-style-type: none"> • Where document review was required, a sampling of documents within the verification period was reviewed to verify the requirements. • When possible, COI and employee interviews were used to verify communication and rollout strategies for various protocols.
<p>Summary of the verification activities</p>	<p><u>Planning</u></p> <p>Planning for the verification was organized with EVR and Glencore corporate staff. Both EVR and Glencore corporate representatives were able to accompany the verifiers during the week of the site visit. Jeff Price, an approved verification service provider (VSP), assisted Rosanne Comacho with the verification preparation and was onsite during the week of 17/11/2025.</p> <p>A request for a site COI list was made, and corporate representatives provided the list and notification to the COI list of the forthcoming site verification. A schedule of verification activities was prepared and shared with site representatives. The schedule included a focused interview with the lead for each TSM protocol and selected site tours.</p> <p><u>Document Review</u></p> <p>In advance of the site visit, a SharePoint site was set up by EVR to allow access to the self-assessment reports and associated documented evidence. The VSP reviewed the available information prior to the site visit and completed additional review of provided evidence after the site visit.</p> <p><u>Site Visit</u></p> <p>The Greenhills verification was conducted over five days, with two of the days being onsite at Greenhills. In accordance with the schedule, an opening meeting was held with site staff, including leadership in key areas. The subsequent interviews focused on reviews of the site's self-assessments for each protocol. Evidence was reviewed and if required, the VSP requested additional information or adjustments to the self-assessment.</p> <p>Sampling of evidence was limited to certain monitoring reports, minutes of</p>

	<p>meetings, and other periodically scheduled activities.</p> <p>A tour of the facilities and general views of the operation were conducted.</p> <p>Interviews were conducted with operational personnel and verification of systems, processes and implementation of procedures. With some protocols, several people from the site participated in the discussion. Over 40 employees and contractors with responsibilities at Greenhills were interviewed, including both leadership and front-line employees. Interviews with front-line employees were conducted without supervisors present, generally in groups of 1 or 2 employees. One session included a group of 10 front line employees.</p> <p><u>COI Interviews</u></p> <p>The COI interviews were conducted in person and by Microsoft Teams meetings based on availability of the participants.</p>
Was a site visit conducted?	Yes
Did the facility provide advance notice of the verification to communities of interest?	Yes
Number and types of communities of interest interviewed to support the verification	<i>2 local communities and 2 First Nations (6 external COI members total)</i>
Has the facility developed an action plan to address gaps to achieve Level A or Yes on any TSM performance indicators?	<i>Not Applicable</i>

Summary of Findings

Criterion	Rating <i>C, B, A, AA or AAA (unless otherwise indicated)</i>	Summary of Findings, Identified Gaps, and Examples of Evidence Consulted
Biodiversity Conservation Management		
1. Corporate biodiversity conservation commitment, accountability, and communications	A	<p>Summary of Findings</p> <p>Glencore has an Environmental Policy that includes commitments to manage biodiversity-related risks and integrate biodiversity conservation into mine planning. The Environmental Policy is consistent with the intent of TSM's Mining and Biodiversity Conservation Framework.</p>

		<p>Greenhills Operations (GHO) has shared and communicated the commitment to biodiversity conservation to employees, contractors and relevant on-site communities of interest (COI), as part of its internal committee discussions and basic documents. In addition, the roles and responsibilities for implementing the commitment are clear, and the GHO Environment team, along with the regional Land Strategy team have been tasked with implementing the biodiversity commitment.</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted Glencore Code of Conduct; Glencore Environmental Policy; Biodiversity TAG meeting minutes; ICA commitment</p>
<p>2. Biodiversity conservation planning and implementation</p>	<p>A</p>	<p>Summary of Findings GHO has a Biodiversity Management Plan (BMP), and accompanying Workbooks, which is referenced within its Mine’s Act Permit C-137 Amendment Approving Cougar Pit Extension. The permit requires identification of significant biodiversity (fauna, limnology, flora) aspects, biodiversity monitoring and periodic reporting. BMP actions are shared internally via internal rollout training presentations and Lunch & Learns; externally with COI via Biodiversity Technical Advisory Group (TAG) meetings; and reported through the Reclamation dashboard, monthly internal Sustainability reports, and the Annual Reclamation Report.</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted GHO BMP (2022); 2025 Land Plan On A Page; Elk Valley Cumulative Effects Management Framework; Biodiversity TAG meeting minutes; Elk Valley Regional Wildlife Monitoring Program; Lands and Conservation Lunch & Learn presentation</p>
<p>3. Biodiversity conservation reporting</p>	<p>AA</p>	<p>Summary of Findings Biodiversity conservation is reported internally via a Reclamation dashboard, monthly internal Sustainability reports; and externally via the Annual Reclamation Report (ARR), annual Sustainability Report, and Biodiversity TAG and COIAI meetings. Feedback. A review of Biodiversity TAG meeting minutes show that feedback was actively sought regarding the development of EVR’s 2025 BMPs, but the requested feedback was not specific to EVR’s biodiversity reporting.</p>
		<p>Identified Gaps to Achieve Level A</p>

		<p>Examples of Evidence Consulted GHO BMP (2022); GHO ARR (2024); Monthly Sustainability Reports; 2023 Teck Sustainability Report; Biodiversity TAG meeting minutes</p>
Climate Change		
1. Corporate climate change management	AA	<p>Summary of Findings Glencore has a corporate commitment to develop an updated EVR climate change strategy within 3 years of acquisition (2027). EVR completed a Climate Change Risk Assessment (CCRA) and is currently working through action plans for the identified risks. Glencore/EVR's climate change strategy includes decarbonization initiatives, tracking and reporting GHG emissions as part of Glencore's annual sustainability reporting, and use of a MACC curve.</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted Glencore Energy and Climate Change Standard; Summary of Investment Canada Act (ICA) Commitments; Glencore Climate Change Risk Assessment Procedure; 2025 EVR CCRA Submission; Glencore 2024 Sustainability Report; Glencore 2024-2026 Climate Action Transition Plan; 2024-2024 MACC</p>
2. Facility climate change management	AAA	<p>Summary of Findings EVR has developed a Climate Change Procedure, in accordance with Glencore's Energy and Climate Change Standard, which is executed by GHO. Sources of energy consumption (natural gas, electricity and diesel usage) and GHG emissions data is collected by GHO, in accordance with Glencore's Emissions & Energy Reporting Procedure, and reported in GSD quarterly (broken down by month). Energy consumption sources and GHG emissions are also reviewed on an annual basis, as part of GHO's reporting for BC Greenhouse Gas emissions. CCRA completed in 2025 and action plans being developed. Climate change mitigation communicated internally via new hire orientation and other internal communications; externally via COIAI meetings and annual regulatory GHG reporting.</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted EVR Climate Change Procedure; EVR Climate Change and Energy Standard; Glencore Emissions & Energy Reporting Procedure; Annual BC GHG Report; 2025 EVR CCRA Submission; Weekly Decarbonization Reports</p>

3. Facility performance targets and reporting	AA	<p>Summary of Findings EVR has committed to developing and adopting a climate transition strategy within 3 years of acquisition as part of its Investment Canada Act (ICA) commitments. GHO undergoes annual third-party verification of scope 1 and 2 emissions, in accordance with the province of British Columbia’s GHG reporting regulation and Output-Based Pricing System (OBPS) requirements. Progress against previous targets set under Teck have been made, and last reported in Teck’s 2023 Annual Sustainability Report.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted Summary of ICA Commitments; EVR Decarbonization Goals Internal Planning Memo; Teck 2023 Annual Sustainability Report; 2024 Glencore Sustainability Report; 2024-2026 climate Action Transition Plan; 2024 Glencore Annual Report (TCFD); 2025 EVR Operations Greenhills Operations Verification Report</p>
Crisis Management and Communications Planning - CORPORATE (Y/N)		
1. Crisis Management and Communications Preparedness	Y	<p>Summary of Findings The corporate crisis management plans have been undergoing a transition from Teck Standards to Glencore Standards over 2024 and 2025. The systems used for maintaining plans and stakeholder contact information (EMQNet) are the same between companies, but reconfiguration of the software and company standards required additional work beyond the annual review. Risk register transition to Glencore from Teck is in progress and will continue until completed. Roles and responsibilities are identified at the corporate level and notification mechanism were reviewed and access to the software was confirmed.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted EVR Crisis and Incident Management Standard, EMQNet Mine Emergency Response Plan (MERP), Risk register summary presentation-2023, Glencore Group Enterprise Risk Standard, EMQNet screenshots of crisis teams, stakeholders, Roles and Responsibilities for CMT members, Incident Management Plan</p>
2. Review	Y	<p>Summary of Findings EMQnet maintains the corporate crisis plans for crisis team members. Notifications to the Crisis team are tested quarterly via EMQnet. Responses are tracked in EMQnet.</p>

		<p>The corporate team does not actively familiarize crisis management team members within 2 months of joining the team. The new members are trained during the regular training cycle but are not full active members until the training is complete.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted EMQnet MERPs, screenshots of EMQnet employee access records, LMS training records, IMT-Incident Management Plan</p>
3. Training	Y	<p>Summary of Findings Tabletops are conducted annually. 2024 Corporate Tabletop was postponed until 2025 due to transition of the systems from Teck to EVR.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted 2025 CRM Tabletop AAR.pdf, EVR Crisis Management Training – Final 2024.pptx, IMT-Incident Management Plan</p>
Crisis Management and Communications Planning - FACILITY (Y/N)		
1. Crisis Management and Communications Preparedness	Y	<p>Summary of Findings Interviews with representatives of the crisis management department were completed. Emergency response scenarios have been identified, and key contact information is managed in EMQnet. The system prompts the user for updates at the log in. The site completed a community tailings drill session in 2023. Evidence was provided to support the engagement with the community. Engagement with local communities is completed.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted GHO Greenhills MERP, FRO EMT-coordinator and Logkeeper training, EVR Incident Classification guide, EVR EMT-ERP, 2023 Community ERP workshop and drill</p>
2. Review	Y	<p>Summary of Findings Interviews with representatives of the crisis management department were completed and evidence was provided to support the review of the GHO crisis management plan. Greenhills and Fording River were reviewed in the same session. EMQnet was utilized to spot check members of the GHO crisis team participated in the annual tabletop drills and</p>

		<p>completed annual reviews of MERP and required training.</p> <p>Notifications to the Crisis team are tested quarterly via EMQnet. Responses are tracked in EMQnet.</p> <p>The site does not actively familiarize crisis management team members within 2 months of joining the team. The new members are trained during the regular training cycle and become full members once trained.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>EMQnet program for MERPs. Screenshots of GHO employee access records in EMQnet, LMS training records</p>
3. Training	Y	<p>Summary of Findings</p> <p>During interviews with representatives of the crisis management department, training scenarios were reviewed for the previous three years. Wildfires in 2023 live tested components of the Crisis management plan.</p>
		<p>Identified Gaps to Achieve Level A</p>
		<p>Examples of Evidence Consulted</p> <p>2024 GHO Tabletop EMQnet Report 1, 2024 GHO Tabletop EMQnet Report 2 , 2-23 TECK GHO OVERTOP 1, EVR Crisis Management training -2025, GHO & EVO Implementation Training -Session 1.pdf, 2024 Tabletop AAR Final.pdf, 2023 Teck exercise Rollover.pdf, EVO GHO FRO Session 2 Training Attendance Sheet.pdf, EVO GHO FRO Session 3 Training Attendance Sheet.pdf</p>
Indigenous and Community Relationships		
1. Community of Interest (COI) Identification	AAA	<p>Summary of Findings</p> <p>EVR's COI Engagement Procedure is expected to be rolled out in Q1 of 2026. In the meantime, GHO is operating under the previous Teck COI Engagement Procedure, which is aligned with TSM requirements. The procedure demonstrates senior leadership endorsement and includes a process for identifying COI, including under-represented COIs, as well as feedback from COI.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>EVR Cultural Heritage Standard; EVR Social Performance Standard; Teck COI Engagement Procedure; 2025 COIAI Map; COIAI meeting minutes</p>
	AA	<p>Summary of Findings</p>

<p>2. Effective COI Engagement and Dialogue</p>		<p>Under EVR’s Social Performance Standard, engagement plans, budgets and tracking is managed at the Regional level, for all assets. Community investment is also managed at the Regional level, through an online grant system, with strict eligibility criteria.</p> <p>Representatives from 2 local communities and 2 First Nations (for a total of 6 external COI members) were interviewed.</p> <p>Indigenous and Cultural Awareness Training (ICAT) previously developed under Teck was available to employees voluntarily. New ICAT is currently under development, in collaboration with KNC.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted EVR Social Performance Standard; EVR Cultural Heritage Standard; EVR Communication Engagement and Participation Procedure; EVR Feedback Mechanism Procedure; ICAT CBT Historical Completion Data; COIAI meeting minutes; SCEEAC meeting minutes</p>
<p>3. Effective Indigenous Engagement and Dialogue</p>	<p>AAA</p>	<p>Summary of Findings Indigenous engagement processes are in place in accordance with the former Teck COI Engagement Procedure. New COI Engagement Procedure is expected to be rolled out in Q1 of 2026. Agreements are in place with Yaqit ʔa·knuq̓iʔit First Nation (YQT), ʔakisq̓nuk First Nation, Shuswap Indian Band, Elk Valley Metis Nation (EVMN) and Tsuutʔina Nation, as well as an Impacts Management and Benefit Agreement (IMBA) with the Ktunaxa Nation Council (KNC).</p> <p>Indigenous and Cultural Awareness Training (ICAT) previously developed under Teck was available to employees voluntarily. New ICAT currently under development, in collaboration with KNC.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted EVR Social Performance Standard; EVR Cultural Heritage Standard; EVR Communication Engagement and Participation Procedure; EVR Feedback Mechanism Procedure; KNC IMBA; YQT Stewardship Agreement; ʔakisq̓nuk Agreement; Shuswap Agreement; EVMN Agreement; Tsuutʔina Agreement; ICAT CBT Historical Completion Data; 2024 IMBA Conditions & Covenants Report; CWG Agenda</p>
<p>4. Community Impact and</p>	<p>AAA</p>	<p>Summary of Findings Evidence shows that EVR supports capacity-building, employment, training, and business development</p>

Benefit Management		<p>opportunities, and invests in community programs aligned with COI priorities. EVR operates under a Community Investment Strategy, embedded in its Social Performance Standard, supported by an online grant system and annual reporting. Engagement is primarily through the COIAI. EVR’s IMBA with the KNC establishes a long-term framework to manage environmental, cultural, and socio-economic impacts of coal mining in the Elk Valley, while ensuring benefits and participation for KNC. Action plans are documented in various agreements (e.g. KNC IMBA, COI-specific agreements). Feedback is tracked and there is evidence of actions taken based on COI feedback.</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted EVR Complaints and Grievances Report 2024-25; FRX Expansion COI Engagement Records; KNC IMBA; Annual SCEEMP Reports;</p>
5. COI Response Mechanism	AA	<p>Summary of Findings EVR Feedback Mechanism Procedure was rolled out in September 2025. Stakeholder Engagement Plan also developed in 2025, modeled after the Fording River expansion (FRX) Engagement Plan. Feedback Mechanism Procedure was shared with COIAI. Feedback is tracked and there is evidence of actions taken based on COI feedback. Lacking evidence of formal effectiveness review (including criteria, rating scale).</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted EVR Feedback Mechanism Procedure; FRX Stakeholder Engagement Plan; COIAI meeting minutes; EVR Complaints and Grievances Report 2024-25</p>
Preventing of Child and Forced Labour (Indicate Y/N)		
1. Preventing Forced Labour	Y	<p>Summary of Findings Reviewed employee codes of conduct and supplier codes of conduct and interviewed HR management representatives to understand the controls in place. Greenhills and Fording River were interviewed together. Whistleblower policy discusses reporting modern slavery and human rights breaches. Discussed inclusion in the supplier code of conduct and communication to suppliers.</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted</p>

		Glencore Human Rights Policy, Glencore Human Rights Standard, Supplier Code of Conduct, Glencore Code of Conduct, Glencore HSEC and Human Rights Management Standard, Glencore Raising Concerns and Whistleblower Policy
2. Preventing Child Labour	Y	<p>Summary of Findings</p> <p>Conducted interviews with HR leadership to understand the hiring process and site and provincial controls to restrict individuals under the age of 18 from being hired. Reviewed verification process by HR for successful candidates. Reviewed distribution method for Supplier Code of Conduct for contractors and inclusion in contracts and purchase orders.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>Supplier Code of Conduct, Glencore Code of Conduct, Glencore HSEC and Human Rights Management Standard, BC Health, Safety, and Reclamation Code for Mines (Section 3.2.1), EVR Standard Candidate profile</p>
Safety and Health		
1. Commitments and Accountability	A	<p>Summary of Findings</p> <p>Interviewed Greenhills safety leadership representative to understand the communication and locations of the commitments and policies. Field verified, through interviews with new and experienced employees and contractors that the safety expectations were understood and communicated properly. The safety expectations were understood and acknowledged consistently across multiple levels and multiple departments. Reviewed and confirmed the safety commitments were communicated in orientations.</p> <p>In the past three years, there were no internal or external audits completed against the requirements of Indicator 1.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>Teck Health and Safety Policy, Glencore Health and Safety Policy, Glencore Safework Performance Expectations, Safe Coal Presentation, Orientation program, field verifications of training, orientation training records, Greenhills- Plan on a Page-include all departments plus H+S</p>
2. Planning and Implementation	A	<p>Summary of Findings</p> <p>Interviewed qualified industrial hygienist and site level industrial hygienist regarding the program and exposure testing and monitoring. Program is</p>

		<p>complete, reviewed by qualified hygienist, and subject to oversight by the qualified hygienist.</p> <p>Interviewed GHO safety leadership representatives to verify HIRA process and transition to Glencore standard from Teck Standard. Representatives indicated ratings are changing but risk ranking is generally consistent as the site transitions standards. This work is still in progress. Verified roles and responsibilities for safety and health management. Verified the use of Standard Practices and Procedures (SP&Ps) for common regular roles throughout the site. Departments have a review frequency for assigned employees.</p> <p>Field verified through workplace interviews the consistent use and application of the field risk controls. The sampling indicated the programs are well understood and consistently applied.</p> <p>In the past three years, there were no internal or external audits completed against the requirements of Indicator 2.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted Facilitated Self assessments of high risk activity, 2024 GHO Risk Register, Glencore Fate and Catastrophic Hazards and Critical Controls Management, Standards, Practices and Procedures (SP&P) for common tasks, GHO Exposure Risk Hazards, online industrial hygiene database, Glencore Group Risk Management Standard, 2025 Industrial Hygiene Program, Visible Field Leadership Tools Guideline, SafeWork Performance Expectations, SafeCoal Presentation, SafeCoal JSA, Greenhills-Plan on a Page-include all departments plus H+S, Industrial Hygienist certification, Take 5 program</p>
3. Training, Behaviour and Culture	AAA	<p>Summary of Findings</p> <p>Training records were spot verified with training department through the sites learning management system.</p> <p>Trainers are assessed for effectiveness annually and training sessions include a feedback mechanism for effectiveness of trainers.</p> <p>Field interviews indicate operational trainers are qualified but interviewees indicated the program is taxed due to higher turnover in the last year.</p> <p>A spot check of training programs for tailings, truck driver training, and new hire orientation indicated consistent use of competency checks. Field interviews indicated they are assessed for competency (tested) for training programs.</p> <p>Field interviews indicate a consistent safety message from all levels of the organization, and the safety commitment and programs (particularly SafeCoal)</p>

		<p>were visible throughout the site tours. The Health and Safety Policy was posted at key locations. GHO maintains an EFAP program and mental health newsletters as well as a mental health hub on the employee intranet</p>
		<p>Identified Gaps to Achieve Level A N/A</p>
		<p>Examples of Evidence Consulted Mental health intranet page, EFAP program, example mental health committee newsletter, training records for new hires, New Hire Orientation, Glencore Tailings academy, operator training signoff sheets, Greenhills-Plan on a Page-include all departments plus H+S, Glencore Safety and Health Policy, SafeCoal presentation, Health and Wellness Account Coverage 1-3.png</p>
<p>4. Monitoring and Reporting</p>	<p>A</p>	<p>Summary of Findings Monthly meeting invites and monthly safety reports were spot checked and verified for consistency. Interviews were completed with attendees to verify topics. Annual review and annual planning process were reviewed and verified via interviews. Visible field leadership was reviewed with GHO safety leadership and dashboard with participation tracking shared. Latest compliance audits and self-assessments for high hazards were reviewed, and corrective action tracking was verified. Monthly safety meetings include communication of key safety KPI. Daily GCOM (daily shift start meetings by crew and department) were attended and verified to include discussion of safety topics. Employees were able to bring forward safety concerns. Attended a GHO Operations safety meeting and verified review of safety stats occurred. Attendees were encouraged to bring safety improvement forward. In the past three years, there were no internal or external audits completed against the facilities documented safety and health monitoring, and reporting programs.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted GHO Monthly PowerPoint HSEC report, GHO monthly leadership review meetings, Greenhills- Plan on a Page-include all departments plus H+S, Facilitated self-assessments for high risk activities, 2022 GHO compliance audit, 2023 Teck Sustainability Report, 2024 Glencore Sustainability Report, EVR Visible Field Leadership (VFL) Tools Guideline, VFL Dashboard for site leadership, Industrial hygiene</p>

		monitoring dashboard, Monthly safety meeting package with safety stats (October 2025).
5. Performance	AA	<p>Summary of Findings</p> <p>With GHO safety leadership, monthly reports with targets were reviewed for leading and lagging KPIs. The process of annual planning and annual review was shared and evidence to support both was reviewed. Monthly meeting invites for reviewing targets and performance were reviewed and confirmed via interview.</p> <p>Safety data sharing for peers was confirmed via participation in the BC Mining Association Safety Committee from the regional leadership.</p> <p>No fatalities were reported onsite during the four-year verification period.</p> <p>GHO High Potential Incident Frequency Rates and TRIFR were reviewed for the previous four years. The site did not meet continual improvement levels for at least 3 of the 4 years.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>GHO Monthly PowerPoint HSEC report, Glencore Coal HSEC&HR Monthly report (October 2025), GHO monthly leadership review meetings, Greenhills-Plan on a Page-include all departments plus H+S, Monthly safety meeting package with safety stats, BC Mining Association Monthly Safety Stats,</p>
Tailings Management		
1. Tailings management policy and commitment	A	<p>Summary of Findings</p> <p>Tailings department representatives provided documentation to support compliance with Glencore tailings commitments and policy. The policy includes commitments to engage communities, provide adequate funding, and reduce tailings where appropriate.</p> <p>In the past 3 years, there was no external audit or evaluation of effectiveness completed for Indicator 1.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>Glencore TSF and Dam Management Standard, Tailings Storage Facility Framework, Tailings Storage Facility Management: Roles and Responsibility Guideline, EVR Tailings Storage Facility and Dam Management Standard, Tailings Storage Facility Policy,</p>
2. Assigned accountability and responsibility	A	<p>Summary of Findings</p> <p>Interviews with key representatives of the tailings department indicate accountabilities are understood</p>

for tailings management		<p>and acknowledged. Documentation is required to be submitted to the province of British Columbia for the Accountable Executive, RTFE, responsible GM, and EOR.</p> <p>Engineers of Record from WSP were assigned to all TSFs and annual facility performance reports were completed for all facilities. Regular meetings are held between EVR staff and EOR and evidence was provided to support the EOR has lines of communication with the AE through the annual review process.</p> <p>In the past 3 years, there was no external audit or evaluation of effectiveness completed for indicator 2.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted Glencore TSF and Dam Management Standard, Tailings Storage Facility Framework, Tailings Storage Facility Management: Roles and Responsibility Guideline, EVR Tailings Storage Facility and Dam Management Standard, Roles and Responsibilities EVR TSF and Dam Management, 2024 02 28-EOR Scope of Service_Greenhills_WSP.pdf, GAH AE Delegation EVR Mike Carrucan.pdf, GHO Dam Owner Appointment Letter-signed.pdf, GHO RTFE-signed.pdf, GHO-EOR Appointment Letters</p>
3. Tailings management system and emergency preparedness	A	<p>Summary of Findings</p> <p>With representatives of the tailings department EPRP documents and drills were reviewed, including flood response plans and a community focused drill from 2023. The EPRP and associated plans were complete and up to date and reviewed annually. Inundation mapping was completed and is included in the EPP.</p> <p>The TMS and associated Glencore standards were reviewed and referenced. The site has been actively transitioning from legacy Teck standards to Glencore standards for tailings management over 2024 and 2025. A review of ITRB meetings was discussed and documentation was provided. Risk assessments have been conducted for legacy Teck facilities, and the site has been updating risk assessments using the Glencore Enterprise risk matrix. Evidence was reviewed to support the work updating the risk assessments.</p> <p>Roles and responsibilities related to TSF management are maintained by the site. The roles and responsibilities include budget responsibility.</p> <p>In the past 3 years, there was no external audit or evaluation of effectiveness completed for Indicator 3.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted</p>

		Glencore TSF and Dam Management Standard, Tailings Storage Facility Framework, Tailings Storage Facility Management: Roles and Responsibility Guideline, EVR Tailings Storage Facility and Dam Management Standard, GHO TSF Risk Register Review, Site F MCR Facility- Tailings Risk Matrix, TBS Risk Assessment, 2024 Annual Tailings Management Review, TSF Bowties, 1583 Tailings Emergency Response Plan and flood response protocol-2025 update, 1400 GHO MERP, 2024 Table top exercise EPRP, 2023 Community ERP workshop and drill, 2024 ITRB Meeting, Decisions and Action log – GHO EOR.xlsx, 2024 WSP Annual Facility Performance report for all TSF, Roles and Responsibilities EVR TSF and Dam Management, ITRB Resumes, Nov 2024 GHO ITRB Meetings.pdf
4. Operation, maintenance, and surveillance	A	<p>Summary of Findings</p> <p>Interviews were conducted with RTFE and associated Greenhills tailings staff regarding the OMS manuals. The two OMS manuals are aligned to the requirements of Indicator 4 including information about water balances, roles and responsibilities, critical and routine maintenance activities, and surveillance. TARPs are included in the appendix of the OMS.</p> <p>The OMS manuals are current and are reviewed annually. OMS training for relevant staff is assigned in the LMS and was verified.</p> <p>In the past 3 years, there was no external audit or evaluation of effectiveness completed for Indicator 4.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted Final_GHO_SiteFOMSMannual_240201_Signed.pdf, 1543_EVR_TailingsStorageFacility_OMSMannual.docx, 1543_2024_FiguresandAppendices_Combined.pdf, OMS training assignment in LMS, Training History Kennan Brockman, inspection schedule.png</p>
5. Annual tailings management review	A	<p>Summary of Findings</p> <p>With representatives from the tailings department the contents of the annual tailings management review were reviewed including the meeting minutes and decision log. Annual meeting included a review of previous open actions.</p> <p>In the past 3 years, there was no external audit or evaluation of effectiveness completed for Indicator 5.</p> <p>Identified Gaps to Achieve Level A N/A</p> <p>Examples of Evidence Consulted 20241206 Annual TWRS Review meeting minutes.pdf, 20241202_2024 Annual Meeting</p>

		Presentation-EVR Overview.pdf, 241217_GHO_ATMRM_Final.pdf, GHO_2024_ATMRM_Minutes_Final.pdf,00 GHO Assurance Letter March 2024.pdf
Water Stewardship		
1. Water Governance	AA	<p>Summary of Findings</p> <p>Glencore’s Environment Policy outlines commitments to the principles of water stewardship. Commitment is operationalized through the Strategic Water Governance Framework, which is aligned with TSM requirements. Evidence demonstrates senior management endorsement of water stewardship principles, integration of water considerations into corporate policies, and clear assignment of roles and responsibilities at the Corporate level (Framework) and Regional level (2025 Elk Valley Water Quality Plan).</p> <p>Risk assessment of water infrastructure undertaken in 2024; based on results, water infrastructure upgrades, changes and modifications have been prioritized and incorporated into 2026 budget planning. The 2024 GHO Midterm Review included a review of water resources.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>Glencore Environmental Policy; Glencore Strategic Water Management Framework; 2025 Elk Valley Water Quality Plan; 2025 GHO Mine Water Management Plan; GHO WIRA Engineering Report; 2024 GHO Midterm Review</p>
2. Operational Water Management	AA	<p>Summary of Findings</p> <p>GHO has a Mine Water Management Plan (MWMP) to manage water-related risks and opportunities. Water management responsibilities are clearly assigned, supported by documented procedures and monitoring programs. A site-wide water balance was last updated in 2024. Control measures include a Local Aquatic Effects Monitoring Program (LAEMP), Regional Aquatic Effects Monitoring Program (RAEMP) and Nitrogen Source Control Plan. Systems to track water use, quality, and discharge, and to ensure compliance with regulatory requirements are outlined in the MWMP. Internal reporting mechanisms (GSD) and oversight by senior management were verified. Internal audits (Facilitated Self Assessments) are conducted, but no external audit.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p>

		2025 GHO MWMP; GHO WIRA Engineering Report 2024; Annual Report Elk Valley Regional and Site-Specific Groundwater Monitoring Programs Volume 3; 2025 GHO Water Metrics; Greenhills Creek Local Aquatic Effects Monitoring Program 2023; Regional Surface Flow Monitoring Plan 2023; FRO & GHO 2024 LOM Report
3. Watershed-scale Planning	AAA	<p>Summary of Findings</p> <p>EVR has taken steps to understand and manage water-related impacts beyond each mine site via the Elk Valley Water Quality Plan (EVWQP). Evidence demonstrates participation in regional watershed governance groups (e.g. Environmental Working Group (EWG), Groundwater Working Group (GWG)), engagement with other water users (2024 Water Quality Open House), and consideration of cumulative effects in planning (2024 Annual Report Elk Valley Regional and Site-Specific Groundwater Monitoring). The facility has documented processes for sharing data (BC Government Dashboard) and collaborating with stakeholders to support integrated watershed management (Water Quality Open House, EWG/GWG Meetings).</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>2025 EVWQP; 2024 Water Quality Open House (https://www.glencore.ca/en/evr/water); Water Quality Adaptive Management Plan 2024 Update; 2024 Annual Report Elk Valley Regional and Site-Specific Groundwater Monitoring; Elk Valley Water Quality Dashboard.url</p>
4. Water Reporting and Performance	AA	<p>Summary of Findings</p> <p>GHO has established systems to track water use, discharge quality, and compliance with regulatory requirements. Evidence demonstrates that performance data is collected consistently (GHO Water Metrics), analyzed for trends, and reported internally to support decision-making. Public reporting on water performance is available (2024 Water Quality Open House; https://www.glencore.ca/en/evr/sustainability/water-quality/water-quality-monitoring). Lacking evidence that feedback on water reporting is actively sought.</p>
		<p>Identified Gaps to Achieve Level A</p> <p>N/A</p>
		<p>Examples of Evidence Consulted</p> <p>2025 EVWQP; 2025 GHO Water Metrics; 2024 Water Quality Open House; 2024 Surface Water Quality Monitoring Report</p>

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.	<input checked="" type="checkbox"/> 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.	<input checked="" type="checkbox"/> The scores in this report are considered accurate based on this verification.
Limitations	
Date of statement of verification	23 December 2025
Signature of lead verifier	