Assessment Summary Report

Participant Information

Name of the Site	Teck Metals Ltd, Trail Operations
Unique identifier provided by the Copper Mark	P0072
Address	5 Aldridge Avenue Trail, B.C. Canada V1R 4L8
Country of Operation	Canada
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	High-purity lead metal (99.99%) and lead metal alloys; High-purity zinc metal (99.99%) and zinc metal alloys; High purity silver bars (99.99%)
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Zinc, lead, germanium, indium, cadmium, silver, gold
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Zinc, lead
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	Silver (LBMA)
Types of operations included in scope	
Mining	☐
Concentrate blending	☐
Solvent extraction and electrowinning	☐
Smelting	☒
Refining	☒
Fabrication	☐
Other (*please explain*)	
Infrastructure owned or controlled by the site and included in scope	

Roads	☐
Rails	☐
Ports	☐
Other (*please explain*)	

Equivalent Systems

The following equivalent systems were applied:
Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the Copper Mark Recognition Process.

Equivalent System	Review Process	Criteria Covered by Equivalency
Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc 1 April 2022	N/A – the assessment was conducted through the Copper Mark Assurance Process.	31. Due Diligence in Mineral Supply Chains
Integrated assessment against the following standards: Toward Sustainable Mining • Biodiversity Conservation management • Crisis Management and Communications Planning • Indigenous and Community Relationships • Safety and Health • Water Stewardship • Responsible Sourcing Alignment Supplement	The assurance / certification was confirmed to be: • Valid at the time of the review • No more than 24 months old and / or plans for reassessment are underway. • In effect for an additional 12 months and / or plans for reassessment are underway • Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials • Accompanied by improvement plans where applicable	All criteria

• GHG and Energy Management International Council on Metals and Mining Performance Expectations The Copper Mark Criteria		
ISO 14001:2015 16 November 2020	The assurance / certification was confirmed to be: • Valid at the time of the review • No more than 24 months old and / or plans for reassessment are underway. • In effect for an additional 12 months and / or plans for reassessment are underway • Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials • Accompanied by improvement plans where applicable	14. Environmental Risk Management

Independent Site Assessment Information

Name of the Assessment Firm (if applicable)	PricewaterhouseCoopers, LLP
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Overall verification: 3 October 2022 – 7 February 2023 Site visit: 29 January 2023 – 1 February 2023
Assessment Period	1 January 2022 – 3 October 2022 Additional documents may have been reviewed as far back as 3 years

Summary of the Assessment Methodology	Assurance was performed in accordance with the International Standards on Assurance Engagement (ISAE) 3000, Attestation Engagements Other Than Audits or Reviews of Historical Financial Information. PwC's sampling methodology was applied to support the reasonable assurance opinion.
	Permanent workers: 1570 permanent workers
	Contract workers: Variable due to contractor activities on site; at the time of the assessment, there were approximately 175 contractors on site
Summary of the Assessment Activities	• Opening meeting
	• Site tour
	• Interviews with site management, site representatives, sample of employees, sample of contractors, sample of Communities of Interest
	• Review of email confirmations from sample of suppliers
	• Document and record review

Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully Meets	Trail has established and maintains processes to ensure compliance with applicable laws. In 2023, Teck Trail Operations (Trail) pleaded guilty to charges laid under the federal Fisheries Act and the provincial Environmental Management Act for a historical (2019) release of effluent into the Columbia River. Although the event took place prior to the assessment period the charges were resolved in 2023 during the assurance year and thus, one gap was identified: • Trail was not in compliance with all national legal requirements at the time of the assessment. The assessors did not identify any gaps in Trail's management system to ensure compliance with all national legal requirements. Rather, the non-compliance is the result of a pollution

		system failure in 2019 which has been assessed accordingly in criterion 20.
		Please refer to criterion 20 for further information, including the improvement measures required to address the gap identified in criterion 1.
		This was confirmed through interviews with management and workers; a review of documents including mechanisms to identify relevant legal requirements, tracking and monitoring tools, the general ledger for legal expenses, and training records; and facility walkthrough demonstrating posted laws and regulations.
2. Business Integrity	Fully meets	Trail implements policies, practices, and controls that prohibit and effectively prevent bribery (including facilitation payments) and corruption in all their forms, conflicts of interest and anti-competitive behavior by employees, agents, or other company representatives. This was confirmed through review of the internal controls to mitigate anti-bribery and anti-competitive behavior, including the Economic Contribution Report, employee expense forms and procurement payments; interviews with workers to understand their awareness of the policies and procedures to report corrupt behavior; and interviews with management to understand the controls in place.
3. Stakeholder Engagement	Fully meets	Trail has a process to carry out community of interest mapping and implements an engagement plan. Trail has a grievance mechanism in place. This was confirmed through a review of documents including the training records, list of key and critical stakeholders, and monitoring process; interviews with management; interviews with a sample of external stakeholders.

		More information is available here and here.
4. Business Relationships	Fully meets	Trail has a process to promote responsible business practices with significant business partners, including suppliers.

This was confirmed through a sampling of assessments and monitoring activities carried out on suppliers, sampling of supplier confirmations on conformance to Trail's requirements, a review of documents including policies and procedures for selecting and evaluating contractors, suppliers and other business partners and the Master Risk Ranking Feed where suppliers are identified and ranked, testing of the systems of compliance, interviews with management; and interviews with employees and contractors. |
| 5. Child Labor | Fully meets | Trail has a management system that prevents the employment of children under the age of 15, prevents of child labor, and prevents the exposure of employees under the age of 18 to hazardous work.

This was confirmed through review of documents including the policies and commitments; review of training and security procedures to monitor personnel on-site including visitors and employees to ensure no underage personnel enter site operations under 18 years of age; review of legal environment to understand the risk-based approach taken by the operation; interviews with management; and site visit inspections to ensure no underage workers. |
| 6. Forced Labor | Fully meets | Trail has a management system that prevents the use of any forms of forced labor and participation in acts of human trafficking. This was confirmed through review of policies, the code of conduct, procedures for |

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		controls, and interviews with workers and management.
		This was confirmed through a sampling of payroll controls and contracts; a review of policies, commitments, and training related to forced labor; a review of the investigation process that results from labor-related grievances; interviews with management; and interviews with workers including union representatives.
7. Freedom of Association and Collective Bargaining	Fully meets	Trail has processes in place to respect employees' rights to freedom of association and to collective bargaining, participate in collective bargaining processes in good faith, and not obstruct alternative means of association where there are legal restrictions. This was confirmed through a review of the current Collective Bargaining Agreement; review of the Code of Sustainable Conduct, including the commitment to uphold freedom of association and collective bargaining; review of training records; interviews with management; and interviews with workers including unionized workers.
8. Discrimination	Fully meets	Trail has a process in place to prevent and address all forms of harassment and discrimination in the workplace. This was confirmed through review of relevant policies, commitments, and training; a sample of employee confirmations of discrimination training; inspection of the grievance mechanism; interviews with management; and interviews with workers and contractors, including female representatives and representatives from different age categories.
9. Gender Equality	Fully meets	Trail has a process to continually assess and monitor progress to ensure the implementation of a policy on gender equality in the workplace.

		This was confirmed through a review of the Equity, Diversity, and Inclusion Policy; inspection of training and communication to all workers; a review of gender pay gap assessments carried out; review of grievances to identify any related to gender equality; interviews with management; and interviews with employees and contractors including female representatives of each.
10. Working Hours	Fully meets	Trail has a system in place to keep employees' total regular and overtime working hours to 60 hours per week unless defined otherwise by applicable law or a collective bargaining agreement; and to ensure overtime is voluntary, provide one rest day in seven; and provide annual leave.
		This was confirmed through a review of documents including the fatigue management plan and relevant training materials, overtime approval forms, and the collective bargaining agreement which includes a section specific to hours of work such as the average employee hours permitted in a work week; interviews with management; interviews with workers.
11. Remuneration	Fully meets	Trail has a system to pay wages that equal or exceed the national minimum wage, the appropriate industry wage (if higher), or a living wage.
		This was confirmed through a review of documents including the collective bargaining agreement, which includes a section on 'overtime rates'; sampled contracts and payroll reports to confirm remuneration above the living wage, payroll controls and calculations, and employee contracts; interviews with management; and interviews with workers including unionized representatives.
12. Occupational Health and Safety	Fully meets	Trail has an occupational health and safety management system that

		aligned with internationally accepted best practice frameworks.
		This was confirmed through a review of relevant commitments, policies, and accountabilities; inspected compliance requirements related to occupational health and safety; review of documents including the emergency response controls and management plan, exposure reduction plan, risk assessment process, internal standards, training, health and safety monitoring and reporting, and health and safety performance, meeting minutes from safety committees; interviews with management; interviews with workers; interviews with relevant communities of interest; and site visit inspections to observe workers utilizing their personal protective equipment, safe machines, emergency preparedness measures including first aid, and health and safety information displayed prominently on production sites in ways that are easily comprehensible to all workers.
13. Grievance Mechanism	Fully meets	Trail has a grievance mechanism for employees that meets the effectiveness criteria of the UNGPs.
		This was confirmed by inspection of the grievance mechanism; review of the investigation procedures and relevant roles and accountabilities; review of training and communication in place for workers; interviews with management; and interviews with workers.
14. Environmental Risk Management	Fully meets	The assessment confirmed Trail has a valid ISO 14001 certificate.
15. Greenhouse Gas (GHG) Emissions	Fully meets	Trail has processes in place to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting protocols.

		This was confirmed through review of documents including policies, internal standards, records, documents and mechanisms in place related to energy use and greenhouse gas emission management systems, greenhouse gas emission management reporting, and greenhouse gas emission management targets, training, and communications for workers, corporate decarbonization strategy, and public reports on climate change; inspection of GHG verification results, system in place to measure and track carbon emissions; interviews with management; interviews with workers; and site observations of new technology to improve efficiency and reduce emissions. More information is available here.
16. Energy Consumption	Fully meets	Trail has a system to implement and quantify energy efficiency improvements and increased use of renewable energy to reduce total energy consumption and/or energy intensity. This was confirmed through a review of documents including relevant policies, internal standards, records, documents and mechanisms in place related to energy use management systems, management reporting and management targets, public reports; a review of the system in place to measure and track energy consumption; an inspection of the results of energy data assurance; interviews with management; interviews with workers; and site observations of new technology to improve efficiency and reduce emissions.
17. Freshwater Management and Conservation	Fully meets	Trail has a system in place to conduct a comprehensive assessment of water-use impacts and risks in collaboration with relevant stakeholders and to implement

		measures to ensure that water consumption does not restrict availability/access for other water users or reduce the range and populations of fauna and flora in the catchment area of the site / facility.
		This was confirmed through a review of documents including relevant policies, framework, internal standards, reports, documents and mechanisms in place related to water governance, water management, water reporting and performance, training, risk registers and impact assessments, and communication to workers; observation of a sample of the monitoring and controls over water discharge and water withdrawals; interviews with management; interviews with workers; and interviews with external stakeholders.
18. Waste Management	Partially meets	Trail implements a risk-based waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (hazardous, non-hazardous, and inert). The following improvement opportunity was identified: • Improve waste management plan to include formal mechanism for checking the effectiveness of the plan. This should include actions for analysis and remedial action where effectiveness is defective. • Formally document the risk-based waste removal process in the management plan. This was confirmed through a review of documents including the impact assessments, the process hazard assessment risk matrix application for waste management, policies, framework, internal standards and procedures, documents, mechanisms for waste management, training, and

		communications to workers; inspection of adherence to regulatory requirements for storage of waste and response plans; interviews with management; interviews with workers; site visit inspections to observe waste management practices.
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Partially meets	Trail implements the mitigation hierarchy to avoid, minimize, reduce, and compensate for the adverse impacts of pollution on human health and the environment.

Sources of emissions to air have been identified, a monitoring program is implemented, and targets or thresholds have been established with time-bound action plans in place.

In 2023, Teck Trail Operations (Trail) pleaded guilty to charges laid under the federal Fisheries Act and the provincial Environmental Management Act for a historical (2019) release of effluent into the Columbia River. Please refer to criterion 1 for further information.

As a result of the incident in 2019, Trail has put in place further controls for monitoring and testing effectiveness. The assessment confirmed that the operation is not currently polluting into the river, is operating within the boundaries of the relevant permits, and the mitigation hierarchy is applied.

The following gap was identified:

• While the controls have been put in place, additional time is needed to demonstrate effective implementation.

This was confirmed through a review of documents including relevant policies, framework, internal standards, and mechanisms to support the application of the |

		mitigation hierarchy, management plans, continuous improvement plans, training awareness presentations, reporting presentations, risk identification process and risk registers associated with pollution; inspection of regulation compliance including the operational plan submitted to the British Columbia Ministry of Environment including the system to tack compliance against permits; interviews with management; interviews with workers; interviews with external stakeholders; and site visit inspections to observe mechanisms in place to avoid and minimize pollution.
21. Biodiversity and Protected Areas	Fully meets	Trail has a system to implement the mitigation hierarchy to avoid, minimize, reduce, and compensate for adverse impacts on biodiversity; to avoid adverse impacts to Critical Habitats or Endangered Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless specifically and legally permitted. This was confirmed through a review of documents including relevant policies, internal standards, reports, documents and mechanisms in place related to biodiversity conservation, Biodiversity conservation planning and implementation, biodiversity conservation reporting, impact assessments and workbooks including discussions on restoration impracticalities and resulting mitigation action plans, and training and communication to workers; review of examples of mitigation hierarchy implementation; interviews with management; interviews with workers; and interviews with external stakeholders.
22. Mine Closure and Reclamation	Not applicable	This criterion is not applicable to non-mining operations.

		Trail implements a management system to monitor, avoid, minimize, reduce, and compensate for adverse impacts on community health and safety.
23. Community Health and Safety	Fully meets	This was confirmed through a review of documents including relevant policies, internal standards, reports, documents and mechanisms in place related to community health and safety, training and communication to workers, Trail Area Health & Environment Program website and descriptions, committee information including meeting notes, published reports including an annual blood level report from 2021, fugitive dust project update from 2022, and ambient SO2 reduction and control update from 2022; interviews with management; interviews with workers; and interviews with external stakeholders.
24. Community Development	Fully meets	Trail has a system in place to identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development. This was confirmed through a review of documents including relevant policies, internal standards, reports, documents and mechanisms in place related to community development, such as the 2022 Community Engagement Plan, the Continual Improvement Plan Master List - Business Function Review, and the 2022 Communities of Interest Mapping, training and communications to workers; publicly available information including the Trail Operations Engagement with Our Community Fall 2021 Engagement Summary Report, Discussion Guide, and Feedback Form; review of the Trail Area Health & Environment Program Strategic Directions 5-Year Plan 2022-2027 and the Trail Area Health &

		Environment Committee Meeting Minutes; interviews with management; interviews with workers; and interviews with external stakeholders.
25. Artisanal and Small-Scale Mining	Not applicable	During the site assessment it was confirmed through interviews and a risk-assessment that there are no artisanal or small-scale mines in Trail's sphere of influence.
26. Human Rights	Fully meets	Trail implements the UN Guiding Principles on Business and Human Rights including human rights due diligence. This was confirmed through a review of documents including relevant policies, internal standards, reports, documents and mechanisms in place related to Human Rights, including Teck's Expectations for Suppliers and Contractors and Teck's Code of Ethics, training for workers, Teck Trail Operations Engaging with our Community Discussion Guide, which provides the community the opportunity to provide feedback, Trail Human Rights Risk Assessment, which allows Trail to identify gaps where relevant in the management of human rights; interviews with management; interviews with workers; and interviews with external stakeholders.
27. Security and Human Rights	Partially meets	While not applicable to non-mining operations and Trail not being in a Conflict Affected or High Risk Area, Trail has included this criterion in the assessment. Trail implements training aligned with the Voluntary Principles on Security and Human Rights (VP on SHR) when engaging with private or public security forces. The following improvement opportunity was identified: • The security company at Trail is trained in the Justice Institute of

		BC which includes principles of human rights and Indigenous Peoples Rights, however there is no formal training in the Voluntary Principles Security and Human Rights. A training program is being developed and will be implemented at Trail.
		This is confirmed through a review of documents including relevant policies, framework, internal standards, and mechanisms in place related to Security and Human Rights, including Trail's most recent Human Rights Risk Assessment, which has an assessment to determine whether security personnel are trained on when to intervene and how to use minimal authorized force; inspected the General Induction Training video for all visitors on site, which includes a discussion on security and access; interviews with management; interviews with workers; interviews with external stakeholders; observation of security personnel performing the specified procedures and protocols prior to allowing visitors on site during the in-person site visit.
28. Indigenous Peoples' Rights	Fully meets	Trail implements a management system to respect the rights of Indigenous Peoples, including FPIC; avoid adverse impacts on Indigenous Peoples' lands, livelihoods, resources, and cultural heritage; and develop and implement an Indigenous Peoples' engagement plan.
		This is confirmed through a review of documents including policies, agreements, documents and mechanisms in place related to Indigenous engagement and dialogue, including the Teck Trail Ops Public Affairs 2022 Community Engagement Plan and the Teck Trail Operations Indigenous Peoples Engagement Plan, and training and communication for workers; inspected a sample of communications between

		Trail Operations and relevant Indigenous Peoples discussing issues impacting their people, including opportunities to engage further; interviews with management; interviews with workers; and interviews with external stakeholders.
29. Land Acquisition and Resettlement	Not applicable	The site assessment confirmed that no land acquisition or resettlement is in progress or planned.
30. Cultural Heritage	Fully meets	Trail has a process in place to identify cultural heritage sites and to consult with communities of interest to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage. This was confirmed through a review of documents including relevant policies, framework, internal standards, and mechanisms in place related to Cultural Heritage including an Archaeological Guidance report, a Chance Find Management Plan, and references to cultural heritage in Teck's Approach to Relationships with Communities; inspection of a sample of communications discussing issues impacting their communities, including opportunities to engage further; interviews with management; interviews with workers; and interviews with external stakeholders.
31. Due Diligence in Mineral Supply Chains	Fully meets	This criterion was assessed separately using the Copper Mark Assurance Process and the Joint Due Diligence Standard for Copper, Lead, Nickel, and Zinc on 30 January – 3 February 2022. The full report on this criterion and the results of the assessment is available here.
32. Transparency and Disclosure	Fully meets	Trail reports annually on economic, social, and environmental performance through the corporate level GRI Sustainability Reporting Standards, which is independently assured. More information is available here.

	Trail through corporate operations outlines its commitment to implement the EITI on the website here.

Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard.	☐
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 9 February 2025.	☒
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some, or all of the applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 9 February 2025.	☐
The site misses some or all of the applicable requirements of the Risk Readiness Assessment and / or for Criterion 31, the applicable criteria of the Joint Due Diligence Standard. The Site has not committed to continuous improvement.	☐
Limitations:	
Additional comments:	

Award

The Copper Mark	☐
The Molybdenum Mark	☐
The Nickel Mark	☐
The Zinc Mark	☒

This Summary Report is prepared using data from the independent accountant's assurance report and the independent assessor report. The Copper Mark confirms the assessors' opinion and awards the relevant metal Mark(s) as follows.

Date the Zinc Mark is awarded	30 May 2023
Expiry Date of the Zinc Mark	29 May 2026