



The Copper Mark Summary Report

Participant Information

Name of the Site	Highland Valley Copper Partnership
Unique identifier provided by the Copper Mark	P0026
Address	Highway 97C, Logan Lake, BC
Country of Operation	Canada
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper concentrate
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, molybdenum
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	NA
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Other (<i>please explain</i>)	Initial processing of concentrates (autogenous and semi-autogenous grinding and flotation)
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	

Independent Review

<p>During this step, the Independent Reviewer examined the Copper Producer’s self-assessment, supporting documentation, independent third-party assurance reports, and publicly available information.</p> <p>The activities included review for completeness, verifying equivalence, and conducting desk-based due diligence.</p> <p>As a result, the Independent Reviewer recommended the scope of the site assessment to the Copper Mark.</p> <p>The Independent Review took place on these dates:</p>	<p>21 January – 7 February 2022</p>	
<p>The Independent Reviewer confirmed completeness, indicating available evidence for the assessor to review for all applicable criteria:</p>		<p>All criteria</p>
<p>The Independent Reviewer recommended the following criteria be included in the scope of the independent site assessment:</p>	<p>All criteria</p>	
<p>The following equivalent systems were applied:</p> <p><i>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.</i></p>		
<p>Equivalent System <i>(Name, date of assurance / certification)</i></p>	<p>Review Process</p>	<p>Criteria Covered by Equivalency</p>
<p>Toward Sustainable Mining / International Council on Metals and Mining Performance Expectations / Copper Mark Criteria combined assessment October 2021</p>	<p>The Independent Reviewer confirmed the assurance / certification was:</p> <ul style="list-style-type: none"> • 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 	<p>All criteria</p> <p>Note that 19. Tailings was completed for Toward Sustainable Mining by a subject-matter expert</p>

	<p>Criteria, including operations, locations, and materials</p> <ul style="list-style-type: none"> Accompanied by improvement plans where applicable 	
The Independent Reviewer recommended the following criteria be considered focus areas for the independent site assessment:		12. Occupational Health and Safety
The Independent Reviewer recommended the following criteria be considered not applicable to the Site:		25. Artisanal and Small-Scale Mining

Independent Site Assessment Information

Name of the Assessment Firm (if applicable)	PricewaterhouseCoopers, LLP
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	<p>5-29 October 2022</p> <p>Onsite: 5-7 October 2022</p> <p>Follow up assessment: October 2023</p>
Assessment Period	<p>1 January 2021 – 29 October 2021</p> <p>Additional documents may have been reviewed as far back as 3 years</p>
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.
Summary of the Assessment Activities	<ul style="list-style-type: none"> 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
	<i>Fully meets, partially meets,</i>	<i>Includes link to publicly available documents or supporting evidence</i>

	<i>does not meet, not applicable</i>	<i>where possible and at a minimum for those criteria with an *</i>
1. Legal Compliance	Fully meets	<p>HVC has established and maintains processes to ensure compliance with applicable laws.</p> <p>This was confirmed through testing of a sampling of mechanisms to identify relevant legal requirements, tracking and communication tools, monitoring manuals, and internal audit results. Interviews with management and workers were conducted to understand their awareness and interpretation of policies and use of mechanisms.</p>
2. Business Integrity	Fully meets	<p>HVC 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.</p> <p>This was confirmed through review of the compliance policy and manual, interviews, and record review to confirm awareness and procedures for reporting and testing of controls for procedures including payments to government, political contributions, taxes, royalties, employee expense reports, and procurement payments.</p>
3. Stakeholder Engagement*	Fully meets	<p>HVC has a process to map and identify Communities of Interest.</p> <p>HVC has a COI response mechanism.</p> <p>This was confirmed through a review of the engagement strategy, mapping process, and feedback procedures, interviews with management, and interviews with COI representatives.</p> <p><i>include link to access the Teck grievance mechanism /HVC grievance mechanism/ learn more</i></p>

4. Business Relationships	Fully meets	<p>HVC has a code of conduct applicable to employees, suppliers, and contractors. The code is actively promoted and there are systems in place to monitor and ensure compliance.</p> <p>This was confirmed through a review of the code of conduct, testing of the systems of compliance, interviews with management and interviews with contractors.</p>
5. Child Labor	Fully meets	<p>HVC has policies and procedures in place to prohibit child labor. HVC operates in a jurisdiction where labor standards and codes including mining codes do not allow child labor or dangerous work under the age of 18.</p> <p>This was confirmed through review of policies, the code of conduct, procedures to confirm the ages of employees, and interviews with management.</p>
6. Forced Labor	Fully meets	<p>HVC has policies and procedures in place to prohibit forced labor. Observations and interviews confirm that no workers appear to be working involuntarily.</p> <p>This was confirmed through review of policies, the code of conduct, procedures for controls, and interviews with workers and management.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>HVC has processes in place to respect freedom of association and collective bargaining.</p> <p>This was confirmed through a review of the current collective bargaining agreement and negotiations process, check of policies, code of conduct, and training materials, and interviews with the union representative and workers.</p>
8. Discrimination	Fully meets	<p>HVC has a process in place to respect the rights of workers and eliminate harassment and discrimination.</p>

		<p>This was confirmed through review of policies, code of conduct, training material, interviews with workers, and grievances logged in the grievance mechanism.</p>
9. Gender Equality	Fully meets	<p>HVC implements policies and practices to promote diversity at all levels of the company, including the representation of historically under-represented groups, and reports on progress.</p> <p>HVC also has processes to identify and resolve barriers to the advancement and fair treatment of women in the workplace.</p> <p>This was confirmed through the Equity, Diversity and Inclusion Policy, meeting minutes from the Inclusivity and Diversity Committee, interviews with management, human resources, and workers to gather their understanding on diversity issues, and a review of the annual gender pay equity reviews done at corporate level. Materials specific to gender inclusion, such as gender intelligence training and presentations on fair treatment of women in the workplace, key performance indicators for progress on the advancement and fair treatment of women were also reviewed.</p>
10. Working Hours	Fully meets	<p>HVC has a system in place to ensure regular working hours within legally required limits, provide 1 day of rest in 7, and provide for annual leave in accordance with Canada's Labor Code.</p> <p>This was confirmed through a review of processes and interview with management on ensuring working hours are within legal limits.</p>
11. Remuneration	Fully meets	<p>HVC has a system to remunerate employees with fair wages and benefits that equal or exceed legal requirements or represent a competitive job wage within that job</p>

		<p>market or a living wage (whichever is higher).</p> <p>This is confirmed through the review of employee wage “bands” aligned with responsibilities and skills, interviews with management, and review of collective bargaining agreements.</p>
12. Occupational Health and Safety	Fully meets	<p>HVC has a system in place to manage occupational health and safety.</p> <p>This is confirmed through review of senior level commitments, organizational charts defining health and safety roles and responsibilities, inspection of control verification programs for monitoring the risk controls for health and safety, review of training materials, targets and measures, and supply chain requirements and site observations of good management practices.</p> <p>Interviews with a sample of employees and contractors to confirm their roles and responsibilities, and awareness of policies and procedures in place regarding occupational health and safety were also completed.</p>
13. Grievance Mechanism	Fully meets	<p>HVC has a grievance mechanism for employees, contractors, and other individuals. The grievance mechanism is accompanied by a system to track and respond to grievances.</p> <p>This was confirmed by inspection of the grievance mechanism, interviews with workers, and review of grievance logs.</p>
14. Environmental Risk Management	Fully meets	<p>The independent review confirmed HVC has a valid ISO 14001 certificate.</p>
15. Greenhouse Gas (GHG) Emissions*	Fully meets	<p>HVC has processes in place to reduce greenhouse gas emissions, define targets, and publish results. This is complemented by energy consumption reduction targets and</p>

		<p>programs, as well as a Climate Change Outlook and strategy.</p> <p>This was confirmed through interviews with relevant personnel, workers, review of the Energy Policy and Energy and GHG Manual, review of tracking data and related methodologies, internal verification results, energy improvement projects, public reports, and observation of energy and GHG sources on-site.</p> <p><i>include link to public disclosure</i></p>
16. Energy Consumption	Fully meets	<p>HVC has a system to manage and reduce energy consumption onsite. This is complemented by GHG emissions reduction targets, as well as a Climate Change Outlook and strategy.</p> <p>This was confirmed through interviews with relevant personnel, workers, review of the Energy Policy and Energy and GHG Manual, review of tracking data and related methodologies, internal verification results, energy improvement projects, public reports, and observation of energy and GHG sources on-site.</p>
17. Freshwater Management and Conservation	Fully meets	<p>HVC has a system in place to govern water use, including internal controls, risk management, and stakeholder engagement processes.</p> <p>This was confirmed through a review of policies and procedures, systems to track non-compliances, internal assessments and water use reports, interviews to understand operational use of water, water monitoring plans including those that integrate stakeholder feedback, internal water related data and reports, and external reports.</p>
18. Waste Management	Fully meets	<p>HVC applies the mitigation hierarchy to prevent pollution, manage releases and waste (hazardous, non-hazardous, and inert), and address</p>

		<p>potential impacts on human health and the environment.</p> <p>This is confirmed through review and discussion on policies and procedures including, review training material, review of external and government inspection reports, worker, and management interviews to understand awareness of environmental policies, and site observations of good waste management practices.</p>
19. Tailings Management	Fully meets	<p>The independent review confirmed the equivalence with the Toward Sustainable Mining Standard and specifically the Tailings Management Protocol (assessment conducted by Priscu and Associates Consulting Engineers Inc.).</p> <p>This was confirmed through a review of the policy and commitment, management systems and emergency preparedness, accountability and responsibilities, annual tailings review, and OMS manual.</p>
20. Pollution	Fully meets	<p>HVC applies the mitigation hierarchy to prevent pollution, manage releases and waste (hazardous, non-hazardous, and inert), and address potential impacts on human health and the environment.</p> <p>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.</p> <p>This is confirmed through review and discussion on policies and procedures including dust mitigation, review of training material, review of external and government inspection reports, and worker and management interviews to understand awareness of environmental policies including pollution prevention.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>HVC and Teck corporate have systems for biodiversity conservation planning and implementation. This</p>

		<p>includes short- and long-term goals for biodiversity conservation as well as risks and action plans in place.</p> <p>This was confirmed by interviews with relevant management and a sampling of stakeholders, review of facility level baseline data, monitoring data, risks and impact data, internal and external assessments, contracts, and partnerships for conservation, reporting mechanisms and public reports.</p>
<p>22. Mine Closure and Reclamation</p>	<p>Fully meets</p>	<p>As of the follow up assessment in October 2023, this criterion is fully meets.</p> <p>HVC has a process in place to plan for the environmental and financial impacts of mine closure in consultation with internal and external stakeholders.</p> <p>This was confirmed through review of the Mine Plan and Reclamation Program, closure targets, maintenance and surveillance, financial and technical plans, and interviews with management.</p> <p>During the follow up assessment of October 2023, it was confirmed that the improvement plan to include socio-economic factors in the mine closure plan was implemented.</p> <p>This was confirmed through interviews with management to understand the approach to developing socio-economic factors; review of the Environment Assessment submitted to the BC Environment Assessment office, which includes socio-economic aspects as part of the permitting process for HVC 2040; and a review of feedback from communities of interest consultation and comments and feedback included in the environment assessment submission.</p>
<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>HVC has a community engagement action plan related to community health and safety including</p>

		<p>understanding impacts of pollution and waste management.</p> <p>This was confirmed through a review of community action plans, review of monitoring and tracking records, interviews with management and stakeholders.</p>
24. Community Development	Fully meets	<p>HVC has policies and practices in place for themselves, suppliers and contractors on community investment and procurement opportunities for local suppliers.</p> <p>This was confirmed by a review of policies and procedures, tracking of local spending and contribution, investment programs, and review of contracts and partnerships.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>During the site assessment it was confirmed through interviews and a risk-assessment that there are no artisanal or small-scale mines in HVC's area of influence.</p>
26. Human Rights	Fully meets	<p>As of the follow up assessment in October 2023, this criterion is fully meets.</p> <p>HVC implements the UN Guiding Principles on Business and Human Rights through a policy commitment, human rights due diligence and providing remedy. HVC has a functioning grievance mechanism available to internal and external stakeholders and has conducted a risk-based human rights saliency review.</p> <p>This was confirmed through review of policies and procedures, confirmation from suppliers that they have reviewed the policy, worker interviews, review of the grievance mechanism and associated records.</p> <p>During the follow up assessment in October 2023, it was verified that the improvement plan to improve the mechanisms to identify, assess, and control actual or potential human</p>

		<p>rights impacts in consultation with experts and potentially affected groups was implemented.</p> <p>This was confirmed through a review of the updated Human Rights Due Diligence Procedure, which includes procedures to manage human rights across Teck operations, including identifying, assessing, and managing human rights risks and impacts; review of the human rights risk assessment report conducted by a third-party at HVC; and a review of the updated human rights training.</p>
<p>27. Security and Human Rights</p>	<p>Fully meets</p>	<p>As of the follow up assessment in October 2023, this criterion is fully meets.</p> <p>HVC is not located in a Conflict-Affected or High-Risk area, nor do HVC hire public or private security personnel. As such, HVC implements, on a risk-based approach, the Voluntary Principles on Security and Human Rights in accordance with Teck's Human Rights Policy.</p> <p>This is confirmed through interviews with management about the policies and procedures for security and human rights, review of the risk register, training material and systems to investigate any reports of incidents relating to security and human rights.</p> <p>During the follow up assessment in October 2023, it was verified that the improvement plan to further develop the Teck procedures under the Teck Human Rights Policy to ensure that if or when interactions with local police or other security occur, they are made aware of HVC's expectations in relation to adherence to the Voluntary Principles on Security and Human Rights, was implemented.</p> <p>This was confirmed through a review of the updated Human Rights Due Diligence Procedure, which includes procedures to manage human rights</p>

		<p>across Teck operations, including procedures specific to aligning on-site security with Teck’s approach; review of the new training on the Voluntary Principles for Security and Human Rights; and a review of revised expectations for suppliers and contractors including reference to human rights and security.</p>
<p>28. Indigenous Peoples’ Rights</p>	<p>Fully meets</p>	<p>As of the follow up assessment in October 2023, this criterion is fully meets.</p> <p>HVC has mechanisms in place to engage in two-way dialogue on topics of interest to both HVC and Indigenous Peoples. This is documented in the Indigenous Peoples Policy, and HVC operational Standards and Procedures.</p> <p>This is confirmed through interviews with COI and HVC management, review of the stakeholder engagement strategy report, sample of training on cultural awareness, interviews with Communities Of Interest, testing of the engagement plan to ensure it includes dialogues on what is important to the communities.</p> <p>During the follow up assessment in October 2023, it was verified that the improvement plan to resolve issues raised by COIs within a “meaningful” timeframe was implemented.</p> <p>This was confirmed through interviews with site management about resourcing and capacity building within the social performance team, which had been identified as a root cause; inspection of the organizational chart and structure with clear roles and responsibilities for the Communities and Indigenous Affairs Team, including onboarding provided to social performance staff; and interviews with the Community & Indigenous Affairs Superintendent regarding the functioning of the communication channels between</p>

		HVC and COIs, and response by HVC to COI concerns raised.
29. Land Acquisition and Resettlement	Fully meets	<p>HVC has a process to avoid resettlement and apply the mitigation hierarchy, including implementing actions or remedies that address residual effects to restore or improve livelihoods and standards of living when unavoidable.</p> <p>This is confirmed through a review of the policies and procedures on resettlement commitments, investigation of resettlement planning documents, review of risk assessments, and commitments to avoiding forcible displacement of individuals, groups, or communities.</p>
30. Cultural Heritage	Fully meets	<p>HVC has a process in place to identify cultural heritage sites and to consult with stakeholders to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage.</p> <p>This was confirmed by inspecting the risk register to ensure cultural heritage issues are included, review of policies to respect cultural heritage, review of manuals on how to address social impacts from operations, and interviews with management to understand how cultural heritage is maintained and respected.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>As of the follow up assessment in October 2023, this criterion is fully meets.</p> <p>HVC has a process in place to conduct due diligence on facilities and supply chain activities.</p> <p>This was confirmed through a review of supply chain due diligence policies and procedures, code of conduct, training on the code of conduct, pre-qualification program, facility risk registers, risk assessments on corruption and conflict, and review of list of suppliers and contractors.</p>

			<p>During the follow up assessment in October 2023, it was verified that the improvement plan to further align with the OECD Due Diligence Guidance through enhanced risk procedures has been implemented.</p> <p>This was confirmed through a review of Teck's Expectations for Suppliers and Contractors public policy statement; review of the updated Human Rights Due Diligence Procedure; and a review of the human rights risk assessment report conducted by a third-party consultant at HVC.</p>
	31.a. Management System	Fully meets	<p>HVC has a system to conduct due diligence including a code of conduct and human rights policy.</p> <p>During the follow up assessment in October 2023, it was verified that the implementation plan to align the policy with the OECD and Annex II risks has been implemented.</p>
	31.b. Red Flag Identification Process	Fully meets	HVC has a system to identify red flags including conducting risk assessments and supplier screening.
	31.c. Risk Assessment Process	Not applicable	No red flags have been confirmed.
	31.d. Risk Management Process	Not applicable	No red flags have been confirmed.
	31.e. Public Reporting*	Fully meets	HVC reports on supply chain activities in its annual sustainability report, available here .
	32. Transparency and Disclosure*	Fully meets	<p>HVC reports annually on economic, social, and environmental performance through the corporate level GRI Sustainability Reporting Standards, which is independently assured. Access here.</p> <p>HVC through corporate operations outlines its commitment to implement the EITI on the website here.</p>

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.	<input checked="" type="checkbox"/>
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 28 October 2023.	<input type="checkbox"/>
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 28 October 2023.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Limitations:	
Additional comments:	The site assessment was an integrated assessment combining the requirements for the Copper Mark, the ICMM Performance Expectations, and MAC's Toward Sustainable Mining.

Copper Mark Award

This Summary Report is prepared using data from the independent review report and the independent assessment report. The Copper Mark confirms the assessors' conclusion and awards the Copper Mark as follows

Date the Copper Mark is awarded (dd/mm/yyyy)	8 February 2022
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Expiry Date of the Copper Mark (dd/mm/yyyy)	7 February 2025
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