



Assessment Summary Report

Participant Information

Name of the Site	Red Dog Operation (RDO)
Unique identifier provided by the Copper Mark	P0102
Address	Northwest Artic Borough, near Kotzebue, Alaska
Country of Operation	United States of America
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Zinc concentrate, lead concentrate
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Zinc, lead
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.)	N/A
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"/>
Fabrication	<input type="checkbox"/>
Other (please explain)	
Infrastructure owned or controlled by the site and included in scope	

Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input checked="" type="checkbox"/>
Other (<i>please explain</i>)	

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
ISO 14001:2015 Valid until 3 Dec 2025	The assurance / certification was confirmed to be: <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 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)	9 December 2022 – 8 December 2023 Onsite: 9 October 2023 – 12 October 2023

Assessment Period	<p>2023 Operating Year Requirements: 9 December 2022 to 8 December 2023</p> <p>Additional documentation and evidence may have also been reviewed as part of meeting the 3-year cycle requirements.</p>
Summary of the Assessment Methodology	<p>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.</p> <p>The assessment was carried out against the following standards:</p> <ul style="list-style-type: none"> • ICMC Mining Principles and Performance Expectations (ICMM PE) (facility level) • The Copper Mark Criteria for Responsible Production (The Copper Mark), including the Joint Due Diligence Standard • Mining Association of Canada’s Towards Sustainable Mining (MAC TSM) Protocols: <ul style="list-style-type: none"> ○ Indigenous and Community Relationships (2019 version) ○ Biodiversity Conservation Management (2020 version) ○ Crisis Management and Communications Planning (2018 version) ○ Climate Change (2021 version) ○ Safety and Health (2020 version) ○ Preventing Child and Forced Labour (2019 version) ○ Water Stewardship (2018 version) ○ Tailings Management (2022 version) <ul style="list-style-type: none"> ▪ OMS Guide (2021 version) ▪ Tailings Guide (2021 version) ▪ Table of Conformance (2022 version) <p>Permanent workers: Over 400</p> <p>Contract workers: Over 400</p>
Summary of the Assessment Activities	<p>The assessment consisted of document review and preparation. While on site, the following activities took place:</p> <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 • Document and record review

	<ul style="list-style-type: none"> Closing meeting
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>RDO 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>RDO 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 anti-corruption compliance audit report and interviews with management and employees for awareness of the policy and training. Additionally, record review to confirm 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>RDO has processes and policies in place to map and identify Communities of Interest (COI).</p> <p>RDO has systems for COI engagement, public feedback procedures, and monitoring, tracking, and reporting of COI feedback. During interviews, COI representatives confirm engagement processes and feedback mechanisms in place to resolve disputes.</p>

		<p>Training is provided to employees on effective engagement and dialogue.</p> <p>This was confirmed through a review of the engagement strategy, mapping process, feedback procedures, agreements with key COIs; interviews with management; and interviews with a sample of COI representatives.</p> <p><u>Access the Teck Grievance Mechanism/ More Learn</u></p>
4. Business Relationships	Fully meets	<p>RDO 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. This is supported by a contractor pre-qualification program, due diligence questionnaires for customers, and a broader risk-based due diligence program.</p> <p>RDO has a system in place to identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner.</p> <p>Additionally, RDO support contractors and suppliers to operate responsibly and to standards of ethics, safety, health, human rights, and social and environmental performance comparable to its own.</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 to confirm understanding of supply chain expectations and policies.</p>
5. Child Labor	Fully meets	<p>RDO has policies and procedures in place to prohibit child labor. RDO 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>Controls are in place to confirm the ages of employees, and no personnel</p>

		<p>(contractors or employees) under the age of 18 are allowed onsite.</p> <p>No underage persons were observed on site.</p> <p>This was confirmed through review of policies, the code of conduct, procedures to confirm the ages of employees, and interviews with management to observe their understanding of relevant policies.</p>
6. Forced Labor	Fully meets	<p>RDO has policies and procedures in place to prohibit forced labor and to monitor working hours of both employees and contractors. Interviews with management confirm their understanding of these policies.</p> <p>Onsite observations and interviews confirm that no workers appear to be working involuntarily. Interviews with workers and contractors confirm that they are not forced to be in work and have the right to end the employment and say no to overtime.</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>RDO has processes, policies, and training in place to respect freedom of association and collective bargaining. Management interviews affirmed their comprehension and training in these policies. There is no union present at the site.</p> <p>This was confirmed through interviews with workers; and review of documents including check of policies, code of conduct, and training materials.</p>
8. Discrimination	Partially meets	<p>RDO has processes in place to respect the rights of workers and eliminate harassment and discrimination. Training on this matter is given during onboarding, and management interviews confirm their understanding of these policies. Additionally, controls are in place for employee grievances</p>

		<p>such as the “Doing What’s Right Program”.</p> <p>An opportunity for improvement was identified:</p> <ul style="list-style-type: none"> • An incident occurred at RDO in 2023, the incident was investigated and as part of the investigation additional controls were identified as being required (e.g. additional access control). At the time of the assurance activity these controls had not been implemented as such an improvement opportunity has been identified. <p>This was confirmed through review of policies, code of conduct, training material, interviews with workers, and grievances logged in the grievance mechanism.</p>
<p>9. Gender Equality</p>	<p>Fully meets</p>	<p>RDO implements policies and practices to promote diversity at all levels of the company, including the representation of historically under-represented groups. RDO reports on progress in this regard.</p> <p>RDO also has processes to identify and resolve barriers to the advancement and fair treatment of women in the workplace. This is achieved through employment, supply chain, training, and community investment programs, which aim to contribute to the socio-economic empowerment of women within the community.</p> <p>This was confirmed through the review of 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</p>

		performance indicators for progress on the advancement and fair treatment of women were also reviewed.
10. Working Hours	Fully meets	<p>RDO has a system in place to ensure regular and overtime working hours are within legally required limits for both employees and contractors. Worker interviews confirm that any overtime is paid and voluntary.</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>RDO 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 market or a living wage (whichever is higher).</p> <p>Employee remuneration is managed at the head office, through the implementation of employee “bands”, which outline payment aligned with responsibilities and experience.</p> <p>This is confirmed through the review of employee wage “bands”, interviews with management, and review of collective bargaining agreements.</p>
12. Occupational Health and Safety	Fully meets	<p>RDO has systems, policies, and procedures in place to manage occupational health and safety, minimize risks, and provide relevant training.</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</p>

		and responsibilities, and awareness of policies and procedures in place regarding occupational health and safety were also completed.
13. Grievance Mechanism	Fully meets	<p>RDO has a grievance mechanism for employees, contractors, and other individuals who may be adversely impacted by company activities. The grievance mechanism is accompanied by a system to track and respond to grievances.</p> <p>Worker and contractor interviews confirm they know where to find the grievance mechanism and that they've received training on the matter.</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>RDO has implemented an environmental management system (EMS) that is functionally equivalent to an internationally recognized EMS standard. RDO is certified to ISO 14001:2015, which was recognized as equivalent. Assessors completed further assurance activities to ensure that processes are in place at the time of the verification.</p> <p>Onsite observations confirm environmental protection measures are in place, including secondary containments, spill kits, recovery/reuse of water, dust control measures and groundwater monitoring.</p> <p>Risk registers are used to track environmental risks, as well as controls that can prevent the causes or reduce the severity of the consequences.</p> <p>Worker interviews confirm their awareness of the EMS, Environmental Policy, and significant environmental aspects and impacts.</p> <p>This was confirmed through interviews with relevant personnel, workers, review of the EMS and Environmental Policy, review of tracking and</p>

		monitoring data, internal verification results, public reports, and observations on-site.
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>RDO has processes in place to reduce greenhouse gas (GHG) emissions, define targets, and publish results. This is complemented by energy consumption reduction targets and programs, as well as a Climate Change Outlook and strategy. Reduction targets are considered at the corporate level and then implemented at the site level to meet 50% reduction by 2030 for Teck-wide.</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>RDO has a systems and policies in place to manage and reduce energy consumption onsite. This is complemented by GHG emissions reduction targets, as well as a Climate Change Outlook and strategy. For RDO, all energy consumption is run from diesel and therefore also resulting in GHG emissions. The focus is to change this to renewable sources (which will reduce emissions by over 50%).</p> <p>Other strategies to reduce energy consumption include projects to recover, recycle and reuse energy, natural resources, and material. Further energy improvement projects were observed onsite.</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,</p>

		internal verification results, energy improvement projects, public reports, feasibility study, and observation of energy and GHG sources on-site.
17. Freshwater Management and Conservation	Fully meets	<p>RDO has a system in place to govern water use, including internal controls, risk management, and stakeholder engagement processes. Regular water monitoring takes place, including collaborative monitoring with COI on a watershed level. Targets are in place for reduction in water use and plans to achieve these targets were observed.</p> <p>This was confirmed through a review of policies and procedures, systems to track non-compliances, internal assessments and water use reports, interviews with COIs 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	Partially meets	<p>RDO 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. RDO possess relevant Waste Permit Requirements to the State of Alaska and operate using Waste Management Plans and the Environmental Management System.</p> <p>RDO on the whole practice good waste management processes onsite including segregation of waste and bins, clear labelling, and hazardous materials storage.</p> <p>The following opportunity for improvement was identified:</p> <ul style="list-style-type: none"> • Additional compensating controls around chemical storage and potentially hazardous materials could be improved. <p>This is confirmed through review and discussion on policies and procedures including, review training material,</p>

		<p>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>RDO implements TSM's Tailings Management Protocol (2022) and the Tailings Management (2022 version), the OMS Guide (2021 version), the Tailings Guide (2021 version), and the Table of Conformance (2022 version), which together are recognized as equivalent. RDO achieved an AAA rating for the TSM tailings protocol.</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>RDO 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>There is a commitment to prevent and continually work to reduce noise and vibrations, adverse emissions to air, and spills and leakages. Potential sources of pollution are identified, tracked and monitoring programs are implemented.</p> <p>This is confirmed through review and discussion on policies and procedures, 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>RDO and Teck corporate have systems for biodiversity conservation planning and implementation, including a five-year plan for achieving Net Positive biodiversity conservation, along with</p>

		<p>established risks, action plans, and regular monitoring.</p> <p>RDO apply the mitigation hierarchy, which is evidenced by the Biodiversity Management Plan, Caribou Policy, and Native Seed Harvest Project.</p> <p>Additionally, RDO collaborate with COIs on biodiversity conservation as well the Chukchi Sea Polar Bear Research Program.</p> <p>Employees and contractors have received relevant training on the matter.</p> <p>This was confirmed by interviews with relevant management; interviews with a sampling of stakeholders; review of site 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>RDO has a plan for the social and environmental aspects of mine closure in consultation with authorities, employees, and affected communities and other relevant stakeholders.</p> <p>RDO have made financial and technical provisions to ensure planned closure and post-closure commitments are realized, including the rehabilitation of land, beneficial future land use, preservation of water sources and prevention of acid rock drainage and metal leaching.</p> <p>This was confirmed through review of the Mine Plan and Reclamation Program, closure targets, maintenance and surveillance, financial and technical plans; interviews with management; and interviews with representatives from COIs.</p>
<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>RDO has a community engagement action plan to identify potential and actual adverse impacts related to the site's activities on COIs. RDO implements the TSM Protocol on Indigenous and Community</p>

		<p>Relationships (2019 version) and has a rating of AAA.</p> <p>Interviews with members from COIs confirm the implementation of engagement and feedback processes, receiving training, and having access to feedback mechanisms.</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>RDO has policies and practices in place on community investment and procurement opportunities for local suppliers. RDO implements the TSM Protocol on Indigenous and Community Relationships (2019 version) and has a rating of AAA.</p> <p>There is a process in place to identify community development initiatives with local communities and other partnerships.</p> <p>RDO enables access by local enterprises to procurement and contracting opportunities across the project lifecycle, both directly and by encouraging larger contractors and supplies, and by supporting initiatives to enhance economic opportunities for local communities.</p> <p>This was confirmed by a review of policies and procedures, tracking of local spending and contribution, investment programs, review of contracts and partnerships; interviews with partners and local community representatives; and interviews with management to confirm awareness of policies and practices.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>The assessment confirms that there are no Artisanal and Small-Scale Mining activities present in RDO's area of influence.</p>
26. Human Rights	Fully meets	<p>RDO has adopted and implements the UN Guiding Principles on Business and</p>

		<p>Human Rights through its policy commitments to respect human rights, undertaking human rights due diligence, and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that the site has caused or contributed to.</p> <p>RDO has a functioning grievance mechanism available to internal and external stakeholders. Employees and contractors receive human rights training.</p> <p>This was confirmed through review of policies and procedures, worker, and management interviews to confirm awareness of the policies, review of the grievance mechanism and associated records.</p>
<p>27. Security and Human Rights</p>	<p>Fully meets</p>	<p>RDO implements, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.</p> <p>This is confirmed through interviews with management about the policies and procedures for security and human rights, interviews with security contractors, review of the risk register, training material and systems to investigate any reports of incidents relating to security and human rights.</p>
<p>28. Indigenous Peoples' Rights</p>	<p>Fully meets</p>	<p>RDO has policies and procedures in place to respect Indigenous Peoples' Rights, effectively engage, collaborate, and conduct two-way dialogue. This is complimented by mechanisms to identify social risks and employee training on effective dialogue. RDO implements the TSM Protocol on Indigenous and Community Relationships (2019 version) and has a rating of AAA.</p> <p>This is confirmed through interviews with management about the policies and procedures for Indigenous Peoples' Rights; interviews with employees and contractors; interviews with external</p>

		<p>stakeholders; and a review of documents including RDO's agreements with key COIs, training material, relevant policies, and the risk register.</p>
<p>29. Land Acquisition and Resettlement</p>	<p>Fully meets</p>	<p>RDO aims to avoid the involuntary physical or economic displacement of families and communities. Where this is not possible, RDO apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standard or living of displaced people.</p> <p>Site observations confirm that there are no cases of resettlement in RDO's area of influence.</p> <p>This was confirmed through site observations, online research of reports and government data, Subsistence Committee meeting presentations and projects.</p>
<p>30. Cultural Heritage</p>	<p>Fully meets</p>	<p>RDO has a process in place to identify cultural heritage sites and to establish a process based on consultation 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, manuals on how to address social impacts from operations, training documents, Socioeconomic Baseline Data Report, and interviews with management to understand how cultural heritage is maintained and respected.</p>
<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>Responsible sourcing is managed at corporate level.</p> <p>There is a corporate system in place proportional to the size and complexity of the RDO operation.</p> <p>RDO only has sources from its own mine and does not intake external material.</p>

	31.a. Management System	Fully meets	At the corporate level, Teck has established a responsible sourcing policy, which is supported and operationalized by the Responsible Mineral Sourcing Management System procedure.
	31.b. Red Flag Identification Process	Fully meets	Teck has a process to identify CAHRAs. As there are no external suppliers or transportation routes, the review is limited to whether the United States is a CAHRA, which it was determined not to be. No red flags were identified.
	31.c. Risk Assessment Process	Not applicable	No red flags were identified.
	31.d. Risk Management Process	Not applicable	No red flags were identified.
	31.e. Public Reporting	Fully meets	Responsible sourcing at RDO is reported annually through Teck's annual sustainability report. The report is available here .
32. Transparency and Disclosure		Fully meets	RDO reports annually on economic, social, and environmental performance through the corporate level GRI Sustainability Reporting Standards, which is independently assured. RDO outlines its commitment to implement the EITI through corporate operations on their 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.	<input 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	<input checked="" type="checkbox"/>

has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 13 December 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 13 December 2025.	<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:	

Award

The Copper Mark	<input type="checkbox"/>
The Molybdenum Mark	<input type="checkbox"/>
The Nickel Mark	<input type="checkbox"/>
The Zinc Mark	<input checked="" type="checkbox"/>

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	6 February 2024
Expiry Date of The Zinc Mark	5 February 2027