Priscu and Associates
Consulting Engineers Inc.

PriscuEngineers.com

9794 Centrestone Drive
Lake Country, BC, Canada V4V 0A5

GISTM Independent Assurance Verification:

Bruce Tailings Storage Facilities, Arizona

Freeport McMoRan Bagdad Inc., AZ, United States

September 16, 2025

Prepared by: Priscu and Associates Consulting Engineers Inc., Canada

For: Freeport-McMoRan Inc. ("FCX") on behalf of Freeport McMoRan Bagdad Inc., AZ, United States

September 16, 2025

(Via e-mail)

ATTN: Tamara Johndrow, PE
Director Tailings, Crushed Leach and Water
Freeport-McMoRan Inc.
E-mail: tjohndro@fmi.com

Cc: Bill Cobb
VP and Chief Sustainability Officer
Freeport-McMoRan

Georgia Lysay P.Eng
Director Tailings, Crushed Leach and Water
Freeport-McMoRan

Bryce Romig
Director Remediation and Discontinued Operations
Freeport-McMoRan Bruce Mine Site, AZ, USA

Yonatan Fesseha
Chief Engineer TCLW, and
Responsible Tailings Facility Engineer (RTFE)
Freeport-McMoRan Bruce Mine Site, AZ, USA

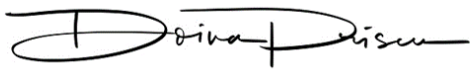
Dear Tamara,

RE: Freeport-McMoRan Inc. ("FCX")
Freeport-McMoRan Bagdad Inc., Bruce Mine Site, AZ, USA
GISTM Independent Assurance Verification (Full) Report

Please find attached the Global Industry Standard on Tailings Management (GISTM) Independent Assurance Verification full report for Freeport-McMoRan Bagdad Inc., AZ, United States tailings storage facilities, completed from July 23-24, 2025 with the site visit completed on October 14, 2024. This report includes verifications of the three existing inactive tailings storage facilities at Bruce Mine Site – that are: North Tailings Impoundment, South Tailings Impoundment, and East Tailings Impoundment.

We thank you for entrusting our team with this important task. Should you have any questions, please do not hesitate to contact the undersigned.

Kind regards,



Doina Priscu, M.Eng, P.Eng (BC), F.E.C.
Project Manager
Principal Engineer – Mining Environment, Director
Priscu and Associates Consulting Engineers Inc.
Mobile: +1 (604) 862-7731; E-mail: DPriscu@priscuengineers.com

Cc: Dr. Caius Priscu, P.Eng (BC); Dr. Janis Shandro

Executive Summary

Our firm, Priscu and Associates Consulting Engineers Inc. (PACE) was retained by Freeport-McMoRan Inc. ("FCX") on behalf of Freeport McMoRan Bagdad Inc., AZ, USA (Bruce Mine Site), to complete an independent assurance verification of the Global Industry Standard on Tailings Management (GISTM) implementation status for the Bruce Tailings Storage Facilities (TSFs), located near the Bagdad Operation in central-west part of Arizona, United States. FCX committed, as part of its International Council for Mining and Metals (ICMM) membership, to the implementation of the GISTM standard, including public disclosure and reporting by August 2023 for “Very high” or Extreme” consequence classification TSFs (PACE understands that FCX met these commitments as evidenced by independent verification of FCX's TSFs and Freeport's broader tailings disclosures), and by August 2025 for all other applicable facilities.

The assurance verification at Bruce TSFs was carried out from July 23 to 24, 2025, based on GISTM’s 77 requirements and associated criteria, and guided by the ICMM’s GISTM Conformance Protocol, issued in May 2021. The assurance verification entailed review of the self-assessments completed by the operation and supporting documentation, site visit (completed on October 14, 2024) and meetings and discussions on each requirement with the Bruce and Bagdad operations staff, Engineer of Record and select FCX corporate team members were held remotely.

The GISTM Independent Assurance Verification evaluated the Bruce TSFs (composed of North Tailings Impoundment (NTI), South Tailings Impoundment (STI), and East Tailings Impoundment (STI)). The three existing TSFs are adjacent to each other; they are managed in a similar manner, under the same governance process (same AE, RTFE, EOR team, and ITRB). The overall Conformance reflects the results for each of the TSFs, however, a single report is issued for all existing facilities with one Table of Conformance. The Independent Assurance Verification concluded with the following outcomes for the Bruce Mine Site TSFs:

Requirements	North Tailings Impoundment	South Tailings Impoundment	East Tailings Impoundment
Facility Status:	Inactive	Inactive	Inactive
Requirements that are Not Applicable:	14	14	14
Requirements that Meet the standard:	63 (100%)	63 (100%)	63 (100%)
Requirements that Partially Meet the standard:	0	0	0
Requirements that Do Not Meet the standard:	0	0	0
TOTAL Applicable Requirements	**63**	**63**	**63**

The applicable requirements for all the facilities either met or exceeded conformance criteria at the time of the independent verification, and therefore full conformance was achieved, with no further plan of actions required from the Owner. The report includes details on the scope of work, methodology, assessment process, and the assessed conformance levels with GISTM. Where applicable, the independent verifiers provided value-added comments and non-binding suggestions to further improve systems and practices at Bruce Mine Site.

Content

1. Introduction

Our firm, Priscu and Associates Consulting Engineers Inc (PACE) of Lake Country, BC, Canada was retained by Freeport-McMoRan Inc. ("FCX") on behalf of Freeport McMoRan Bagdad Inc. AZ, United States to complete an independent assurance verification of the Global Industry Standard on Tailings Management (GISTM, the "Standard") implementation level at the three existing tailings storage facilities (TSFs) Bruce TSFs, located at Bruce Mine Site, approximately 4 miles south west of the town of Bagdad in Yavapai County, and about 100 miles northwest of Phoenix, Arizona, United States.

The Standard is structured around 6 (six) Topic areas encompassing 15 Principles and includes 77 individual Requirements (GTR, 2020).

The Standard applies to tailings facilities, except those deemed to be in a state of safe closure. Also, Conformance is assessed by facility; for facilities with multiple containment structures, or multiple facilities that are part of the same larger mining operation with a common governance program, some documentation and systems may overlap. The noted 77 requirements were evaluated separately for the three existing TSFs at Bruce Mine Site, that is North Tailings Impoundment (NTI), South Tailings Impoundment (STI), and East Tailings Impoundment (STI) TSFs. The existing facilities are located quasi-adjacent to each other, and are part of the same governance program, operational activities, risk management. This report is therefore issued for the Bruce Mine Site, but with three conformance ratings – one for each TSFs.

ICMM members are committed to implementing the GISTM by August 2023 for TSFs with 'Extreme' or 'Very High' potential consequences, and by August 2025, for all other tailings facilities. As such, all applicable criteria should satisfy the "Meets" level of conformance by these times.

2. Scope of the Independent Assurance Verification

2.1 GLOBAL INDUSTRY STANDARD ON TAILINGS MANAGEMENT (GISTM)

The GISTM (or the "Standard") is a global standard on tailings management that applies to both existing and future tailings storage facilities (TSFs). Strengthening current practices in the mining industry by integrating social, environmental, local economic and technical considerations, the Standard covers the entire tailings facility lifecycle – from project concept, planning, and design, through operation and ongoing construction, to closure and post-closure.

The Standard strives to achieve the goal of zero harm to people and the environment with zero tolerance to human fatalities. It requires Operators to take responsibility and prioritize tailings facilities safety through all phases of the facility's lifecycle, including closure and post-closure. It also requires the disclosure of relevant information to support public accountability.

The GISTM was developed and published in August 2020, by three co-conveners which are the International Council of Mining and Metals (ICMM), United Nations Environmental Program, and Principle for Responsible Investment (PRI). As a member of ICMM, FCX has publicly committed to the implementation of the standard at their operations, as per the dates noted above in Section 1. As such, all applicable criteria should satisfy the "Meets" level of conformance within the noted timelines.

2.2 INDEPENDENT ASSURANCE VERIFICATION STANDARDS, GUIDELINES, AND PROTOCOLS

The GISTM Independent (third-party) Assurance Verification is based on the following documents:

- ICMM Tailings Governance Framework; Position Statement (December 2016)
- Global Industry Standard on Tailings Management (August 2020)
- ICMM Conformance Protocols (May 2021)
- ICMM Tailings Management, Good Practice Guide (May 2021)
- ICMM's Assurance and Validation Procedure (February 2020)
- IAASB - ISAE 3000 (Revised) Assurance Engagement Other than Audits and or Reviews of Historical Financial Information, 2013 (revised 2015)
- Engineers and Geoscientists of British Columbia (EGBC) Professional Guidelines and Advisories (2022), Professional Guideline Peer Review (2022)

2.3 CONFORMANCE LEVELS DESCRIPTION

The GISTM Independent Assurance Verification is based on the ICMM 2021 GISTM Conformance Protocol (2021) that maps the 77 requirements and their criteria for conformance. While the Assurance Verification is evidence-based, professional judgement was also used, based on good engineering practices, to assess the alignment of the operational practices with the criteria established by ICMM.

As described in the 2021 ICMM Conformance Protocol, pg. 6:

> *"The possible outcomes of the self-assessment and third-party validation of the individual requirement are "Meets", "Partially Meets" and "Does Not Meet", In some situations specific Requirements are not applicable and will be indicated as "Not Applicable".*

Conformance levels are described in Table 1 hereafter, and align with the ICMM's GISTM Conformance Protocol, Table 1, pg.6 (2021).

Table 1: Description of conformance levels (text in bold as per ICMM Conformance Protocols, 2021)

Conformance Level	Description of Outcome
Meets (M)	**Systems and/or practices related to the Requirement have been implemented and there is sufficient evidence to demonstrate that the Requirement is being met.** • Requirement is met or exceeded. • Some GISTM details may not be all using the exact same text or definitions, but the intent and outcome are the same. • Definitions may not be identical, but the intent and outcome are the same. • No gaps were identified that would impact the overall quality implementation of GISTM. • Activities that take long time to implement are clearly defined and underway, with proper teams, budgets, and schedules, and approved by the RTFE and the AE.
Partially Meets (PM)	**Systems and/or practices related to meeting the Requirement have been only partially implemented. Gaps or weaknesses persist that may contribute to an inability to meet the Requirement, or insufficient verifiable evidence has been provided to demonstrate that the activity is aligned to the Requirement.** • Requirement is Partially Met with recommendations for improvement. • The GISTM requirement is partially addressed. • Minor gaps were identified that may impact implementation of GISTM. • Several updates are recommended for full alignment and conformance with GISTM. • Activities that take a long time to implement are somewhat defined but are not underway or do not have clearly defined teams, budgets, and schedules, and/or are not approved by the RTFE and the AE.
Does Not Meet (DNM)	**Systems and/or practices required to support implementation of the Requirement are not in place, or are not being implemented, or cannot be evidenced.** • Requirement is not properly addressed at this time. • The GISTM requirement is not currently met, and additional work is needed for full conformance. • Major gaps were identified that will impact the quality implementation of GISTM.
Not Applicable N/A	**The specific Requirement is Not Applicable to the context of the asset.**

2.4 OBJECTIVES OF THE INDEPENDENT ASSURANCE VERIFICATION

The objectives of the Independent Assurance Verification were to:

- Competently confirm the reasonableness and authenticity of assertations made in the self-assessment by the Owner of the TSFs.
- Assess the levels of alignment against the GISTM standard and associated conformance protocol requirements for the TSFs, as well as the unique site-specific conditions of the facility.
- Facilitate informed management decisions regarding the status of Standard implementation.
- Allow identification of any non-conformances or gaps in the tailings management practice.
- Ensure that the Accountable Executive (AE) has a third-party opinion regarding the implementation of the tailings management system, independent of the teams (employees, consultants, and contractors) responsible for planning, designing, constructing, operating, maintaining, and closing the facility.

3. Methodology

3.1 INDEPENDENT ASSURANCE VERIFICATION

PACE conducted a limited third-party assurance verification ("Assurance Verification") on GISTM implementation. The ICMM's GISTM Conformance Protocol section ii, pg. 5. followed the ICMM's Validation Guidance and defines the following:

> *" **Third-party validation** – Independent confirmation of the reasonableness and authenticity of assertions made in self-assessments. This review may take place as part of a separate system audit, e.g. an ISO 14001 environmental management system audit. "*

In undertaking the Assurance Verification, PACE reviewed evidence to support the findings that the operation either meets, partially meets or does not meet the requirements of the Standard. This evidence to support the findings may include, but is not limited to, documents and records, direct field observations, interviews with appropriate personnel and results of assessments and/or technical documentation, inspections, monitoring data and analyses. PACE followed the IAASB - ISAE 3000 (Revised) Assurance Engagement Other than Audits and/or Reviews of Historical Financial Information, 2013 (revised 2015) to frame the limited assurance conducted in this exercise, that is limited assurance to a validation process for conformance with a standard (in this case, GISTM). As described in the ICMM Conformance Protocol:

> *"The auditor should confirm during the review that evidence provided can reasonably be expected to address the Requirements and related criteria. However, the Conformance Protocol is based on the premise that an auditor's scope of work does not include a detailed analysis of the evidence provided, especially given that much of it is already subject to oversight by (and the professional judgement of) an Independent Tailings Review Board (ITRB), senior independent technical reviewer, and/or regulatory agency. The functions of independent review (e.g. the ITRB) are summarized in the Standard (Annex 3, Table 4) and described more fully in ICMM's Tailings Management: Good Practice Guide, while more detail on the competencies of auditors is provided in Section vi."*

3.2 CORPORATE FCX DOCUMENTS REVIEW

FCX has prepared a suite of specific GISTM Corporate Conformance Guidance documentation in support of conforming with GISTM implementation at its operations. These documents complement well already established internal policies and guidelines.

In a series of meetings (virtual and in person) during 2022, the Corporate FCX support groups have presented and discussed with the PACE team these documents, their use and application at the operational level, and the context on how they support conformance with the GISTM Requirements. All documents available were reviewed and shared with the PACE team prior to the Bruce TSFs third-party assurance verification.

3.3 TAILINGS FACILITIES SPECIFIC DOCUMENTS REVIEW

Bruce Mine Site staff and their consultants have prepared an extensive and detailed self–assessment of the GISTM Conformance Table, where each applicable requirement was supported by one or multiple documents. These documents were shared via the new platform developed by FCX, called CAAT (Conformance and Assessment Tool on July 10, 2025 in advance of the formal verification that took place July 23-24, 2025. Furthermore, some additional information was provided via shared drive, or e-mails

immediately after the assurance verification. Over 100 documents were submitted as evidence by FCX to the PACE team for this assurance verification process, including both Corporate FCX, near-by Bagdad Operation, and Bruce TSFs site-specific reports.

The supporting documents were reviewed by the PACE team and discussed during the formal verification virtual meetings. Numerous in-depth discussions were conducted with the Operations team and the EOR team, as well representatives of the Social, Legal, and Environmental departments, to understand how they are used in practical context to support the tailings practices to the operation, and their applicability.

Each requirement of the GISTM was reviewed independently with the Operation team, and with support from the Corporate FCX support groups, as well as the Engineer of Record (EOR) during the site visit and meetings in Arizona.

3.4 SITE VISIT AND MEETINGS

PACE completed a site visit of the Bruce Mine Site, including the three existing TSFs on October 14, 2024. The site visit was followed in the same week by face-to-face meetings, held at the mine site, focused on the level of implementation of the GISTM. Meetings were conducted with the personnel from the operation, the EOR, the Bagdad leadership team, and the FCX corporate team. The verifiers appreciate the opportunity to visit the facilities, and the site of the future TSF. Pictures were allowed to be taken during field visit, and a select set of photos are included in Appendix F.

The evidence was presented via the on-line CAAT Tool prepared by FCX, which proved to be very useful and well structured, helping the overall verification and assurance process. The RTFE for the TSFs at Bagdad Operation and Bruce Mine Site led the site visit on October 14, 2024, which was very well organized, including the health and safety aspects, as well as the logistics and the explanations received. FCX is to be commended for developing such a tool, which could be used in the future to update and monitor GISTM implementation status and show improvements over time.

The Verifiers clarify that, aligned with the FCX and Bruce Mine Site documentation and self-assessment, one table of conformance was prepared by PACE for all three inactive TSFs; a single table is presented in Appendix G for all three inactive TSFs. It is noted that the three existing TSFs have been inactive for more than 35 years, and were grouped in one table, as site evidence and management documentations were similar or prepared for the joint group of adjacent TSFs – most of the time jointly shared, such as the Annual Report, OMS manual, ERP, Environmental/Social management documents, Social Baseline Study, climate change, and various other reports. It is also noted that the AE, a newly designated RTFE, EOR team, and ITRB are the same for all three TSFs at Bruce Mine Site. Comments in the conformance protocol refer to all three TSFs. Nevertheless, evaluation of conformance was completed separately for each TSF.

4. Brief Tailings Storage Facilities Description

4.1 EXSITING THREE TSFS AT BRUCE MINE SITE

Bruce Mine Site is located near Bagdad Operation, located in west-central Arizona, about 4 miles south west of the town of Bagdad in Yavapai County and about 100 miles northwest of Phoenix. The Bruce Mine Site TSFs are inactive since late 1980s and partially reclaimed; they cover an approximate combined area of about 12 acres. The TSFs were constructed on natural ground and tailings are reported to have been deposited through gravity transportation and placement methods. The South (STI) and East (ETI) Tailings Impoundments are reported to have been constructed using the upstream method but the construction method for the NTI is unknown (S.E.T., 2018).

The exact tailings storage volume at each Bruce Site TSF is not currently known, however an estimated 1.6 million tons of ore was removed from the Bruce Mine and adjacent mines (Old Dick Mine and Copper Queen Mine) between 1943 and 1977. Ore produced from 1943 through 1955 was shipped off-site and ore produced from 1955 through 1977 was stored on-site in the tailings storage facilities. Evaluations of pre-mining and post-mining topography by AECOM 2024 indicated tailing storage at the STI, ETI, and NTI, are approximately 273,116 cubic yards, 94,301 cubic yards, and 209,946 cubic yards, respectively. Total storage between the three TSFs is approximately 355,000 cubic yards (or 271,400 cu m).

The STI and ETI are reported to have been constructed using the upstream method. The construction method for the NTI is unknown but is likely upstream construction. All three TSFs are currently inactive and partially reclaimed.

Additional summary technical information on STI, ETI and NTI at the Bruce Mine Site is presented in Appendix E, Table E.

Presently, Bruce Mine Site is part of the State of Arizona Voluntary Remediation Program since 2005.

5. Results of the Independent Assurance Verification

5.1 CONFORMANCE RESULTS

PACE independent team members have completed the Assurance Verification based on all information available, for each of the GISTM requirements. The 77 standard requirements were assessed based on evidence provided (which included over 100 documents and reports). In certain situations, the PACE team considered the best practices, the FCX and Bruce Mine Site context and internal requirements, regulatory requirements, and practical considerations to understand and assess alignment with the standard. The focus has always been on material aspects of tailings dam safety and prevention or elimination of catastrophic tailings dam failures.

Levels of conformance were rated using the evaluation matrix presented in Section 2.3 of this report. Tables containing the Independent Assurance Verification results for the 77 Requirements and associated value-added comments are included in Appendix G and H.

North Tailings Impoundment, East Tailings Impoundment and South Tailings Impoundment:

- *Requirements that are Not Applicable:* A total of 14 requirements were identified to be not applicable. They are Requirements 1.2, 3.3, 5.5, 5.8, 6.2, 6.3, 6.5, 13.3, 13.4, 14.1, 14.2, 14.3, 14.4, and 14.5.
- *Requirements that Do Not Meet the Standard:* There are no requirements identified that do not meet the standard (0%).
- *Requirements that Partially Meet the Standard:* There are no requirements identified that partially meet the Standard (0%).
- *Requirements that Meet the Standard:* There are a total of 63 requirements identified that meet the Standard (100%).

Conformance summary results by Topic Area are presented in Table 2, hereafter, for the three existing Bruce Mine Site TSFs. It must be noted that there is no computed average of ratings, and no overall rating for a TSF, since all 77 requirements are equally weighted.

Table 2: Bruce Mine Site TSFs (NTI, ETI, STI) Conformance Summary Results by Requirement / Topic Area

Topic	Meets	Partly Meets	Does Not Meet	N/A	Applicable req's	Total no. of req's
1. Affected Communities	3	0	0	1	3	4
2. Integrated Knowledge Base	7	0	0	1	7	8
3. Design, construction, operation, and monitoring of the Tailings Storage Facility	22	0	0	5	22	27
4. Management and Governance	26	0	0	0	26	26
5. Emergency Response and Long-term Recovery	2	0	0	7	2	9
6. Public Disclosure and Access to Information	3	0	0	0	3	3
TOTAL Requirements	**63**	**0**	**0**	**14**	**63**	**77**
PERCENT CONFORMANCE	**100%**	**0%**	**0%**		**100%**	

5.2 OWNER'S ACTION PLAN TO ACHIEVE FULL CONFORMANCE

The results of the Assurance Verification at Bruce Mine Site demonstrate 100% of the applicable requirements are meeting or exceeding criteria set out in the GISTM Conformance Protocols, without a need for a plan of actions. Hence, a letter from FCX is not required in this Assurance Verification process. Corporate commitment from FCX to maintain full conformance with GISTM is noted in the corporate policy, in the internal guidance documentation, as well as in the FCX commitment as an ICMM member.

5.3 RECOMMENDATIONS FOR FUTURE IMPROVEMENTS

During the Assurance Verification, PACE team members have noted the quality of work being completed by FCX / Bruce Mine Site staff, and their consultants; the positive outcomes of the Assurance Verification reflect this statement clearly. Nevertheless, the independent verifiers have provided additional comments for many of the 77 requirements in the Table of Conformance (included in Appendix G) that could be considered to improve the systems and processes at Bruce Site, as well as potentially for FCX corporate team. The independent verifiers offer these additional suggestions and recommendations for enhancements, to strengthen the tailings management program at the Bruce Mine Site.

These suggestions, prepared based on the PACE team members' experience at the time of the independent assurance verification, also stem partly from the lack of clarity or specificity in the GISTM on how the requirements are written, or the ICMM Conformance Protocols. Some conformance criteria have been left a bit more generic in the noted documents, to accommodate the acknowledged multitude of situations at thousands of TSFs around the world. The comments and recommendations noted in Appendix G in the last (RHS) column, while not mandatory, are made in a constructive and supportive manner and are the sole view of the independent third-party verifiers, for FCX and Bruce Mine Site consideration only.

6. Closing Remarks and Acknowledgements

The PACE Independent Assurance Verification team presents the following closing comments and remarks.

- The overall participation and support from Bruce Mine Site staff and Corporate FCX support groups, as well as their consultants, was excellent.
- The level of openness and professionalism is appreciated, showing a strong positive and supportive corporate culture - a key and fundamental element for any dam safety and sustainability program.
- The logistical support provided by the Bruce Mine Site team and Corporate FCX support groups during the site visit was excellent.
- Meetings on site and remote were very well organized and efficient.
- Documentation was prepared and presented in a clear manner, making the process smooth. The FCX CAAT online electronic system, together with the other Excel spreadsheets self-assessment, helped in organizing all the reports and evidence by GISTM requirement.

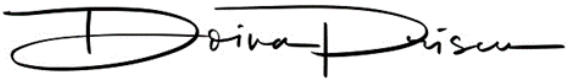
The support and professionalism of all involved is sincerely acknowledged by the PACE team.

7. Closure

Priscu and Associates Consulting Engineers Inc., independent professionals and verification service providers, would like to thank Freeport-McMoRan Inc and Freeport McMoRan Bagdad Inc., Bruce Mine Site, their Engineer of Record (AECOM) and other consultants for their allocated time and assistance in this process.

Should you have any questions related to this report, please do not hesitate to contact the Project Manager, Ms. Doina Priscu, at the address noted below.

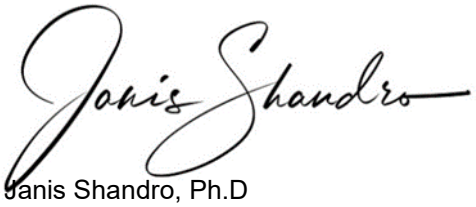
Sincerely,



Doina Priscu, M.Eng, P.Eng (BC), F.E.C.
Project Manager

Principal Engineer – Mining Environment, Director
Priscu and Associates Consulting Engineers Inc.

Mobile: +1 (604) 862-7731
E-mail: dpriscu@priscuengineers.com



Janis Shandro, Ph.D

Community Health and Safety Specialist, Associate
Priscu and Associates Consulting Engineers Inc.

Caius Priscu, Ph.D, P.Eng (BC)

Principal Geotechnical Engineer, Director
Priscu and Associates Consulting Engineers Inc.

Key References

1. ICMM Tailings Governance Framework (2016) https://www.icmm.com/en-gb/our-principles/position-statements/tailings-governance
2. Global Industry Standard on Tailings Management (August 2020) https://globaltailingsreview.org/global-industry-standard/
3. ICMM Conformance Protocols (May 2021) https://www.icmm.com/en-gb/our-principles/tailings/tailings-conformance-protocols
4. ICMM Tailings Management, Good Practice Guide (May 2021) https://www.icmm.com/en-gb/guidance/innovation/2021/tailings-management-good-practice
5. ICMM Integrated Mine Closure; Good Practice Guide (May 2021) https://www.icmm.com/integrated-mine-closure
6. ICMM's Assurance and Validation Procedure (February 2020) https://www.icmm.com/en-gb/our-principles/validation/procedure
7. IAASB - ISAE 3000 (Revised) Assurance Engagement Other than Audits and or Reviews of Historical Financial Information, 2013 (revised 2015) https://www.iaasb.org/publications/international-standard-assurance-engagements-isae-3000-revised-assurance-engagements-other-audits-or
8. EGBC Professional Practice Guidelines and Advisories - Professional Guideline Peer Review (2022) https://www.egbc.ca/app/Practice-Resources/Individual-Practice/Guidelines-Advisories

Appendices

APPENDIX A – DISCLAMER OF THE INDEPENDENT VERIFIERS

Priscu and Associates Consulting Engineers Inc. (**"PACE"**) was engaged by Freeport-McMoRan (**"FCX"**) to conduct a third-party independent assurance verification (the **"Assurance Verification"**) of the implementation level of the Global Independent Standard on Tailings Management at the Bruce Mine Site Tailings Storage Facilities (the **"Tailings Storage Facilities" or "TSFs"**) located near Freeport McMoRan Bagdad Inc. (Bagdad), located some 100 miles northwest of Phoenix, AZ, USA. PACE is delivering a copy of this Assurance Verification report (the **"Report"**) subject to the limitations, restrictions, qualifications, and caveats set forth herein, under its contractual agreement with Freeport-McMoRan, and in the Report.

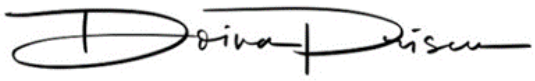
The Report is being provided for the sole and exclusive use of FCX and no other person or entity. Any use which a person or entity other than FCX makes of this Report, or any reliance on or actions taken (or omitted to be taken) by any person or entity other than FCX are the responsibility of such other person or entity. Neither PACE, nor its directors, officers, shareholders, representatives, employees, contractors or affiliates shall have any liability (whether under statute, in contract, in equity, in tort or otherwise) to any other person or entity whatsoever with respect to, resulting from, or in connection with, directly or indirectly, the Report, and no person or entity shall have any rights or claims (or basis for a claim) by virtue of the Report. The Report has been provided solely for informational purposes, and not to induce FCX to enter into any particular course of action. The Report is not a substitute for the continued implementation of leading tailings management and dam safety practices.

In preparing the Report, PACE has followed what it believes to be industry leading practices and a clear and well-defined assurance process and methodology, with an evidence-based review of information and conformance evaluation criteria. However, a certain level of interpretation, reasonableness, adaptation, and judgement (engineering and otherwise) was used, as each tailings facility in the world is unique in its social, environmental, and technical context, design, operation, and management. Interpretation of documents and other information made available to PACE was necessary to complete the Assurance Verification. In particular, valuation of conformance levels conducted as part of the Assurance Verification was based on information provided by and on behalf of FCX. PACE has, at times, relied on the truth, accuracy, and completeness of documents and other information made available to it (including, without limitation, by the FCX and its directors, officers, employees, and other representatives) during the period of time the Limited Assurance Verification was conducted, without further verification or independent investigation. To that extent, the Report is subject to and is informed by the quality of documentation and other information made available to PACE at the time the Assurance Verification was conducted. PACE makes no representation or warranty as to the accuracy of the documents submitted or their contents.

The Report is based upon data and information collected during the period of time the Assurance Verification was conducted and, therefore, reflects a snapshot in time. The Report does not imply, nor is it expected, that the determinations and findings (including, without limitation, the conformance level reporting) set out in the Report will remain the same over time. Forward-looking information, predictions, forecasts, projections, or conclusions about future periods of time involve inherent changes, risks and uncertainties, both general and specific, which give rise to the possibility that they will not be achieved or remain accurate.

As part of the Independent Assurance Verification, PACE considered the quality, completeness, and content of documents provided and the effectiveness of management's internal systems and processes when determining the level of conformance. While the conformance levels for the GISTM implementation clearly reflect the quality of work completed by FCX and Bruce Mine Site team, they are not to be used to measure the safety of the TSFs and associated appurtenant structures.

PRISCU AND ASSOCIATES CONSULTING ENGINEERS INC.



Doina Priscu, M.Eng, P.Eng (BC), F.E.C.
Principal Engineer – Mining Environment, and Project Manager
Priscu and Associates Consulting Engineers Inc.

APPENDIX B – PERSONAL BIOS OF THE INDEPENDENT VERIFIERS

Biographies of the three specialists that completed this independent verification are included hereafter. The focus areas listed below are only indicative of each of the verifier's relevant GISTM specific requirements coverage or leading relevant specialty; however, all three specialists have worked interactively and jointly in all aspects of the assurance verification process, to ensure a true, multi-disciplinary evaluation approach.

Doina Priscu, M.Eng, P.Eng (BC), F.E.C.

Principal Engineer – Mining Environment, and Project Manager
Priscu and Associates Consulting Engineers Inc.
West Vancouver, BC, Canada.

Focus areas in this GISTM Independent Assurance Verification: Environmental, permitting, mine closure, emergency preparedness and response plans, regulatory, disclosure requirements and auditing.

Dr. Caius Priscu, P.Eng (BC)

Principal Geotechnical Engineer
Priscu and Associates Consulting Engineers Inc.
West Vancouver, BC, Canada.

Focus areas in this GISTM Independent Assurance Verification: Geotechnical engineering, mine waste management, tailings dam design, operation, closure, safety and risk management, dam breach and inundation studies, emergency and recovery planning, and TSF governance.

Dr. Janis Shandro

Community Health and Safety Specialist, and Associate,
Priscu and Associates Consulting Engineers Inc., and

Director, Arrowsmith Gold Inc., Parksville, BC, Canada

Focus areas in this GISTM Independent Assurance Verification: Social engagement, community health and safety, and human rights aspects, emergency planning, recovery, and restoration.

Priscu and Associates
Consulting Engineers Inc.

PriscuEngineers.com

PO Box 91220 Stn West Vancouver
West Vancouver, BC Canada V7V 3N6

Doina M. Priscu
M.Eng, M.Sc, P.Eng, FEC

Principal Engineer - Mining Environment

+1.604.862.7731
dpriscu@priscuengineers.com

Education

University of Cambridge, Institute for Sustainability Leadership, UK, 2020 – Business Sustainability Management Course

Queen's University, Kingston, Ontario, Queen's School of Business and MCSC, Canada
2005 – Diploma in Strategic Planning & Leadership

McGill University, Montreal, Canada
1997 – M.Eng, Mining Engineering

Technical University of Civil Engineering, Bucharest, Romania
1991 – M.Sc, Civil Engineering

Professional registration

Professional Engineer – P.Eng, Engineers and Geoscientists BC, Canada (2011 – present)

Professional Engineer – P.Eng, Engineers Geoscientists Manitoba, Canada (2003 – 2018)

Fellow of the Engineers Canada – FEC (2011)

Canadian Dam Association (CDA) – Member

Canadian Institute of Mining (CIM) - Member

Languages

English and Romanian (fluent)

Spanish and French (technical level)

Specialization

Mine closure planning and implementation; mine site reclamation; environmental assessments; permitting; sustainable mining; MAC independent verifier.

Expertise

Doina Priscu is a Co-Founder and Principal Engineer at Priscu and Associates Consulting Engineers Inc, based in West Vancouver, BC, Canada. She has over 30 years of experience in the mining industry in the operational, consulting, engineering, and regulatory aspects of the mining industry in several countries (Canada, Chile, Argentina, Peru, Brazil, Bolivia, and Romania). She gained her experience in areas related to design and expansion of mining projects, environmental impact assessments (EIA), permit submissions and regulatory approvals, mining operational due diligence and mine closure, technical and general assurance processes, health and safety, and other integral aspects of mining sustainability.

Doina provided strategic engineering planning, project management support, and reviews in a variety of mineral resource developments, from grassroots exploration to mine development and closure stages. She successfully led and coordinated multidisciplinary specialist teams for efficient worldwide project management, as technical lead, team manager, and consultant.

She managed implementation of rehabilitation activities and mine closure projects for numerous active, inactive, orphaned, and abandoned mine sites and delivered numerous Closure Plans at the conceptual to detailed level. She drafted and contributed to development and implementation of corporate and international standards focused on closure activities for mining and energy production companies, as well as health and safety aspects.

For several years, Doina has been part of the NOAMI - Canada (National Orphaned/Abandoned Mines Initiative) and MEND – Canada (Mine Effluent Neutral Drainage) program, as Steering Committee member and Provincial representative. In 2019, she represented Teck Resources on the ICMM Mine Closure Working Group.

Doina has organized workshops and conferences on Responsible Mining. While living in Santiago, Chile, she was the Technical Chair and Co-Chair of the Planning for Closure Conference 2016, and EnviroMine Conference 2017; and Technical Chair for the Planning for Closure International Conference 2018. She has taught courses in Mining Sustainability and Mine Closure at the Pontificia Universidad Católica de Valparaiso and Centro de la Minería, Chile.

In 2020, Doina joined the Technical Advisory Panel of the Landform Design Institute in Canada (www.landformdesign.com).

Employment History

Priscu and Associates Consulting Engineers Inc.
Co-Founder and Principal Engineer -Mining Environment (2020 -present)

Teck Resources Ltd. – Corporate, Canada
Acting Director, Regulatory Approvals and Closure (2018 – 2020)

Golder Associates, Chile
Senior Consultant / Regional Lead Mine Closure Latin America, (2016 – 2018)

Universidad Pontificia Católica de Valparaíso, (PUCV) Chile
Lecturer Mining Sustainability Course and Mine Closure Post Graduate Diploma (2016 – 2019)

Anglo American, Corporate, Chile
Technical Senior Audit Manager Operations and Projects, Anglo Business Assurance Services, Santiago, Chile (2014 – 2015)

AMEC, Canada and Chile
Associate Engineer / Senior Project Manager, Environment & Infrastructure (2011 – 2014)

Manitoba Government, Winnipeg, Manitoba, Canada, (2001 – 2011)
Chief Mining Engineer, Mines Branch, Mineral Resources Division (2007 – 2011)

Director Engineering Branch, Workplace Safety & Health Division (2000 – 2007)

Natural Resources Canada, CANMET Experimental Mine, Val d'Or, Quebec, Canada
Rock Mechanics Research Scientist, underground mine operations (1996 – 1999)

AQUAPROIECT S.A., Consulting Engineers, Romania
Design Engineer, Water Resources Projects (1991 – 1993)

Experience Highlights

- Project management and subject matter expert (environmental, mine closure, emergency planning and disclosure) for independent third party verification of GISTM Implementation at numerous operations (Freeport McMoRan Inc. Teck Resources Ltd, Compania Minera Antamina, BHP Minera Escondida)
- Completed Mining Association of Canada (MAC) TSM independent tailings verifications at several mining operations in Canada & Chile.
- Led the development of Teck Resources' mine closure global standard and associated suporting guidence while advancing mine closure projects and planning.
- Lectured in Mining Sustainability Course (Universidad Pontificia Católica de Valparaíso, (PUCV) Chile. Lectured and championed Module development as part of the Post-graudated Diploma in Mine Closure for the Centro de La Mineria Chile.
- Mine Closure Project Development Technical Lead for numerous closure plans: Chile (12 closure plans): CODELCO (two), Antofagasta Minerals (four), Freeport-McMoRan (El Abra), Teck Resources (CDA), Lumina (Casserones), La Ceniza, Ango American (Los Bronces UG), Pucobre (El Elespino), Peru: Rio Tinto (La Granja), Newmont (Yanachocea), Bolivia (San Cristobal)
- Project Manager of Environmental Assessments (EAs) and (EIAs) for greenfield & brownfield mining projects involving multi-disciplinary teams, Compliance Coal LTD; participation in Pucobre and Rio Tinto
- Qualified Professional (QP) for NI43-101complient reports and assurance/due-diligence (environmental, permitting and mine closure sections) for Mineria Guanaco (Chile), Capstone Mining Corp. (Chile), NGEx (Chile/Argentina)
- Technical Assurance Audits for Mining operations and processes, risk-based approach focused on critical controls design and adequacy, (Anglo American), Sustainability Audits (Goldcorp, Antofagasta Minerals)
- Technical regulatory approvals and permitting for mining projects, construction, operations, expansions, and closure, including Teck, INCO, Vale, HudBay Minerals, Crowflight Minerals, Tanco, San Gold, Lafarge.
- Technical Regional Lead for APAC Mine Closure Checklist for Governments Guidance Document (Asia Pacific).
- Project Management for mine closure and mine site rehabilitation of 55 Orphaned and Abandoned Mines (over US $200M), mainly old gold and copper mines, pits and quarries (Manitoba, Canada).
- Technical inspections of about 200 workplaces in terms of safety and health engineering aspects for compliance with legislative requirements as well as recommend corrective actions. Delivery of expert technical reports for over 50 workplace fatality investigations and inquests, to prepare the technical assessments required for crown prosecutions.
- Underground rock mechanics and mine planning; Placer Dome and Cambior, Canada.

Priscu and Associates
Consulting Engineers Inc.

PriscuEngineers.com

PO Box 91220 Stn West Vancouver
West Vancouver, BC Canada V7V 3N6

Caius Priscu
Ph.D., P. Eng (BC)

Principal Geotechnical Engineer

+1.604.839.4237
cpriscu@priscuengineers.com

Education

McGill University, Montreal, Canada
1999 – Ph.D, Mining Engineering

McGill University, Montreal, Canada
1993 – M.Eng, Civil Engineering

Technical University of Civil Engineering, Bucharest, Romania
1989 – M.Sc, Civil Engineering

Professional registration

Professional Engineer – P.Eng, Engineers and Geoscientists BC, Canada (2010-present)

Professional Engineer – P.Eng, Professional Engineers Ontario, Canada (2002-2023)

Languages

English, Romanian (fluent)

Spanish, French (technical level, intermediate)

Professional membership

Technical Sciences Academy of Romania – Honorary Member (since 2022)

Canadian Dam Association (CDA) – Member (2003 to 2021); Corporate Member (2021 to present); former Director for Manitoba on CDA Board (2008 to 2011).

Canadian Institute of Mining, Metallurgy and Exploration (CIM) – Member

United States Society on Dams – Member

ICOLD Chile (2014 to 2019) - Member

Romanian National Committee on Large Dams (ROCOLD) – Honorary Member

ICOLD Committee H: Dam Safety - Member (2014 to 2021)

ICOLD Committee L: Tailings Dams and Waste Lagoons - Member (2022 to present)

Specialization

Mine Waste Management; Dam Safety and Portfolio Risk Management for Tailings and Water Retaining Dams; Tailings Management; Corporate Governance, Standards and Policies.

Expertise

Dr. Caius Priscu is Co-Founder and Principal Geotechnical Engineer with Priscu and Associates Consulting Engineers Inc., based in West Vancouver, BC, Canada. He has over 30 years of experience in the field of geotechnical and geo-environmental engineering related to the mining and water resources industries across the world. He was involved in projects and/or participates in Independent Tailings Review Boards (ITRBs) for operations located in Canada, US, Australia, South Africa, Botswana, Zimbabwe, Tunisia, Chile, Peru, Brazil, Argentina, Ghana, Slovenia, Spain, Mongolia, Philippines, and Romania.

Dr. Priscu's background is in both Civil and Mining Engineering, working over the years with a general contractor team, in consulting engineering, and as an owner/operator of tailings and water retaining dams. During his career, he has participated in projects related to the planning, design, construction, operation and closure of tailings storage facilities and water retaining dams for the mining and water resources industries. Over the last two decades, his career focus has been on dam safety and risk management, and the development of corporate standards and guidance for safe design and operation of mine waste management facilities.

Dr. Priscu has been a tireless volunteer and true supporter of many technical not-for-profit organizations, including the Canadian Dam Association (CDA), The Mining Association of Canada (MAC), the Canadian Institute of Mining, Metallurgy and Exploration (CIM), the Canadian Geotechnical Society (CGS), The Society for Mining, Metallurgy and Exploration (SME), the Chilean National Committee on Large Dams (ICOLD Chile) – past Committee H Dam Safety, the Romanian National Committee on Large Dams, currently serving on Committee L Tailings Dams and Waste Lagoons. He is a past member of the International Council on Mining and Metals (ICMM) tailings working group (TWG) and its working subcommittees relating to tailings dams.

Dr. Priscu is also an Adjunct Professor with the Norman B. Keevil Institute of Mining Engineering at the University of British Columbia, where since January 2021, he enjoys mentoring students, sharing knowledge, and teaching Mine Waste Management courses.

In 2022, he was accepted as Honorary Member of the Technical Sciences Academy of Romania.

Dr. Priscu is the recipient of the Canadian Dam Association 2023 Peter Halliday Award for Service, for his valued contributions and outstanding commitment to the advancement of the Association.

Employment History

Priscu and Associates Consulting Engineers Inc., West Vancouver, BC, Canada
Co-Founder and Principal Geotechnical Engineer (April 2021-present).

University of British Columbia - Norman B. Keevil Institute of Mining Engineering, Vancouver Campus, BC, Canada
Adjunct Professor (January 2021-present)

Anglo American (Chile and Canada) - Corporate
Global Head of Mineral Residue Facilities and Water Management, Group Projects, Technical and Sustainability (2014-2021)

Principal Engineer, Tailings and Mine Waste, Engineering Standards and Governance, Group Engineering, Mining and Technology (2013-2014)

AMEC Earth & Environmental (subsequently Wood, now WSP), Canada
Senior Associate Geotechnical Engineer (2011-2013)
Regional Technical Lead, Manitoba, and Saskatchewan (2004-2011)

Acres International (now Hatch), Canada
Senior Geotechnical Engineer (1999-2004)

Geotechnical Consultant, Montreal, QC, Canada
Independent Consultant (1997-1999)

Group Axor Consulting Engineers, Montreal, QC, Canada
Geotechnical Project Engineer (1994-1997)

CIMA + Ingenieurs Conseils, Laval, QC, Canada
Geotechnical Engineer (1993-1994)

Hydropower Construction Co. (now Hidroconstructia SA), Romania
Junior Site Engineer – three dam construction sites (1987-1990)

Experience Highlights

- Independent Tailings Review Board (ITRB) member for several large mining companies, for operations in Canada, Argentina, Brazil, Chile and Ghana.
- Mining Association of Canada (MAC) independent verifier for MAC member companies with operations in Canada, Chile, Peru and the United States.
- GISTM Independent Verifier for several large mining companies including Teck Resources Ltd., Freeport-McMoRan, Compania Minera Antamina S.A.
- Corporate Level: Global practice area strategic advisory role and technical support for Mineral Residue Facilities and Water Management at Anglo American. Supporting the implementation of leading industry practices for effective and sustainable design, construction, operation, and closure of Mineral Residue Facilities. Supporting as a Senior Advisor on ICMM technical standards and guidelines implementation of best practices in water management.
- Corporate Level: Led a team of up to 15 engineers and scientists to implement leading industry practices for effective and sustainable design, construction, operation, and closure of mineral residue facilities. Portfolio included over 100 tailings dams and 200 water retaining dams. Defined and implemented the Group structural integrity and operational management of tailings dams, water retaining dams, waste rock dumps and stockpiles technical standard.
- Corporate Level: Provided the technical support for implementation of mineral residue disposal strategies and technologies, based on environmental, safety and business principles. Provided advisory and technical support to Anglo American's four Business Units, 34 Operations and associated JV partnerships over eight years.
- Corporate Level: Provided recommendations to the Board of Directors, its Sustainability Committee, Operations Committee, Directors and Group Heads to needs and requirements related to best practices in dam safety and risk management of the Group portfolio of dams. Prepared technical notes and Annual Reports to the Board and senior management team.
- Business Units and Operation Level: Provided specialist support for leading practices implementation across the group in the field of mine waste management, dam safety and surface flooding protection, including OMS manuals, design criteria, emergency planning, FMEA and dam breach analyses, in line with applicable internal technical standard, country specific and ICMM technical requirements.
- Provided specialist technical support, training, Investment Assurance, Operational Risk Management audits, along with internal reviews for reliability, environmental impact, safety, integrity, risk management and mitigation practices.
- Select papers at: https://mining.ubc.ca/person/caius-priscu-2/

Arrowsmith Gold Inc.

arrowsmithgold.ca

551 Tulip St. Parksville,
British Columba, Canada V9P1T7

Janis Shandro
Ph.D (Mining Engineering & Population Health)

Community Health and Safety Specialist

+1.250.951.6776
janis@arrowsmithgold.com

Education

University of British Columbia, Vancouver Canada
2011 – Ph.D, Mining Engineering & Population Health

University of Northern British Columbia, Prince George, Canada
2003 – M.Sc, Chemisty

Lakehead University, Thunder Bay, Ontario
2001 – H.BSc, Biology

Lakehead University, Thunder Bay, Ontario
1999 - B.Sc, Natural Science

Languages

English (fluent)

Spanish, French (basic)

Professional membership

Member - Institute of Corporate Directors (2021-present)

Steering Committee member - Health Impact Assessment Asia Pacific Network (2018-present)

Professional member - International Association of Impact Assessment (2012-present)r

Specialization

Community and Occupational Health and Safety; Influx Management; Emergency Preparedness and Response, Health Impact Assessment, Indigenous Health and Rights; Human Rights Requirements; Livelihood Restoration; Agreements; International Safeguard Policies and Standards; Diplomatic Affairs; Executive Leadership.

Expertise

Dr. Janis Shandro is the founder (2011) and Director of Arrowsmith Gold Inc., a community health and safety firm based in Parksville, British Columbia, Canada. She has over 20 years of direct project experience in Argentina, Australia, Brazil, Cambodia, Canada, Chile, Dominican Republic, Ecuador, Egypt, Ethiopia, Indonesia, Lao PDR, Liberia, Madagascar, Malaysia, Mexico, Mongolia, Mozambique, Myanmar, Panama, People's Republic of China, Peru, Suriname, Thailand, The Philippines, Turkey, United Kingdom, United States of America, Venezuela, and Viet Nam.

Dr. Shandro's work on the development and operation of large-scale complex projects is focused on mitigating risks and impacts to people. She has experience across diverse sectors (including but not limited to mining) in the areas of social and health performance, effective risk management, due diligence conformance reviews, and monitoring and evaluation approaches. She is a trusted advisor to several Indigenous communities, governments (Indigenous and non), international organizations, multilateral development banks, and private sector clients in developing and developed nations.

Dr. Shandro holds a previous academic portfolio as an Assistant Professor with the University of Victoria where she co-led a multi-million dollar federally funded research program as it relates to mining and health. Dr. Shandro was the technical lead for the Health Impact Assessment for the 2015 Mount Polley tailings dam failure and has co-led environmental and social performance independent reviews for over 25 large-scale mining projects globally. She has also supported the development and implementation of corporate guidance on community health and safety and emergency preparedness and response for a large global mining firm. Dr. Shandro is currently the Chair of the Health, Safety, Environment and Social Performance committee, and Independent Director, with the Board of Directors for Artemis Gold Inc., a Canadian mining company. Her dedication to the health and well-being of populations, prompted her to recently establish (in 2022) the Asia Pacific Foundation for Climate and Health. She is currently ACH's Executive Director and Chair of the Board of Directors.

Dr. Shandro has delivered over 60 presentations globally at international conferences and is the technical lead author on numerous international guidance documents, book chapters, and peer review journal papers as it relates to community health and safety.

Employment History

Arrowsmith Gold Inc., Parksville, BC, Canada
Founder and Director (August 2011-present).

Artemis Gold Inc. Vancouver, BC, Canada
Independent Director (August 2021 - present)

Asia Pacific Foundation for Climate and Health. Vancouver, BC, Canada
Executive Director (September 2022 - present)

University of Victoria, Victoria, BC Canada
Assistant Professor/Research Associate (2013-2020)

University of British Columbia, Vancouver, BC Canda
Sauder School of Business Affiliate Professor (2015-2016)

Experience Highlights

- Independent Verification Specialist - Global Industry Standard on Tailings Management - Human Environment Requirements - for mid-tier/large mining companies.
- Social Development Specialist, Asian Development Bank, providing technical lead support for the development and implementation of a $100 million social development program for a green energy project involving the economic displacement of ~25,000 people for a $1 billion transport project.
- Technical Lead, United Nations Development Programme, leading inaugural technical training related to SES#3 on Community Health, Safety and Security and SES#7 Labor and Working Conditions for UNDP project management staff. This also involved developing implementation guidance material and tools related to SES#3 and SES#7 for UNDP global staff.
- Community Health and Safety Advisor and Co-Author of community health and safety/emergency preparedness and response guidance and associated tools for large global mining company.
- Community Health and Safety/Influx Manager for the construction phase of a $9 billion Refinery and Petrochemical Project involving a workforce of 35,000 conforming to international performance standards associated with lender agreements.
- Project Manager and Lead Corporate Trainer for an Asian petrochemical company on implementation of IFC Performance Standards. Supported the corporate development of grievance redress mechanisms for a petrochemical project that involved a construction workforce of 75,000.
- Independent reviewer (mining) on behalf of international lender groups for conformance with international performance standards in Canada, Madagascar, Peru, Chile, Argentina, the Dominican Republic, and Turkey.
- Health Impact Assessment technical lead for the Mount Polley Tailings Dam failure on behalf of an Indigenous health authority. Worked collaboratively with over 20 individual First Nations.
- Community Health and Safety Advisor for three Pacific Northwest Indigenous Nations as it relates to the construction of a mega-Petrochemical project ($40 billion build). Established and supported multi-year monitoring programs.
- Health Impact Assessment Expert consultant for 5 countries within the Greater Mekong Subregion. Supported the establishment of industrial zone legislation, policies, guidelines and cross-border agreements for safeguarding health as it relates to intensive industrial development.

APPENDIX C – STATEMENT OF INDEPENDENCE

The authors of this report confirm that:

a. We are independent of the Owner and its operations. To the best of our knowledge and belief, we have no conflict of interest with the Owner, as defined by industry best practices, which could affect the transparency or impartiality of the Limited Assurance Verification for which we were engaged.

b. We have no relationship with the Owner or its operations, other than as third-party independent verifiers, reviewers, or auditors.

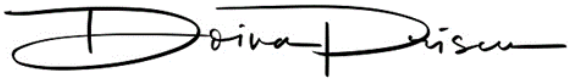
c. We are not providing any professional services to the Owner at any site outside the current contract and scope of work for independent verification, review, or auditing, either directly or indirectly as a sub-consultant.

d. We have not conducted, and do not direct, any studies, strategic plans, design, construction, operational work, engineering assessments or associated environmental services, social or community engagement or consultations, for any of the sites owned and operated by the Owner.

e. We maintained impartiality at all times during the provision of the Limited Assurance Verification detailed in this report.

Signed jointly in Lake Country, BC, Canada on August 18, 2025 by:

Doina Priscu, M.Eng, P.Eng (BC), FEC
Principal Engineer – Mining Environment, Director
Priscu and Associates Consulting Engineers Inc.



(signature)

Caius Priscu, Ph.D, P.Eng (BC)
Principal Geotechnical Engineer, Director
Priscu and Associates Consulting Engineers Inc.

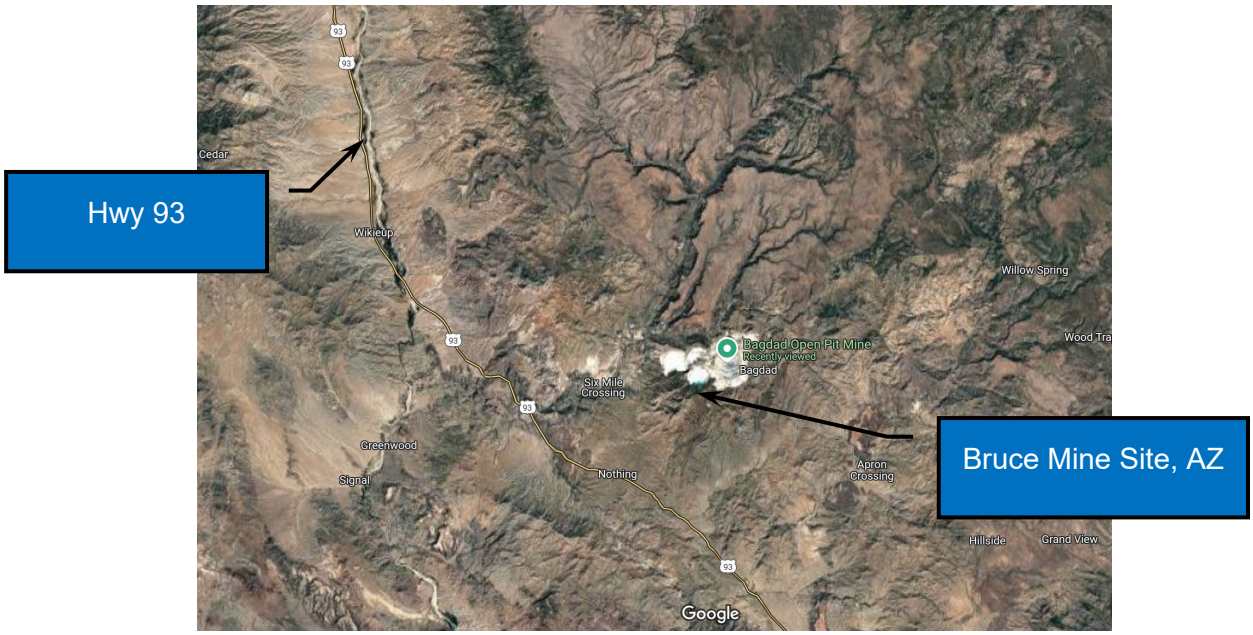
(signature)

Janis Shandro, Ph.D
Principal Social/Health Performance Specialist, Associate
Priscu and Associates Consulting Engineers Inc.

(signature)

APPENDIX D – SITE LOCATION KEY MAP AND SITE KEY FEATURES

Source: Imagery @2024 TerraMetrics, Map Data @2024 Google INEGI Canada



APPENDIX E – SUMMARY OF TECHNICAL CHARACTERISTICS – BRUCE MINE SITE TSFS

Item no.	Characteristics / Parameters	South Tailings Impoundment – STI (Inactive)	East Tailings Impoundment – ETI (Inactive)	North Tailings Impoundment - NTI (Inactive)
1	TSF location in UTM Coordinates (center of TSF)	34°32'37.99"N 113°13'58.98"W	34°32'40.48"N 113°13'52.74"W	34°32'43.24”N 113°13'59.82"W
2	Tailings dam name and construction type	South Tailings Impoundment (STI) – Upstream	East Tailings Impoundment (ETI) – Upstream	North Tailings Impoundment (NTI) – Upstream
3	Current maximum tailings dam height, and crest elevation (ASL – Above Sea Level)	75 feet and 3813 feet ASL	70 feet and 3816 feet ASL	70 feet and 3871 feet ASL
4	Current crest width / total crest length	1000 feet	500 feet	400 feet
5	Current overall upstream / downstream slopes (H:V)	1.5:1	3.5:1	3.5:1
6	Current surface area of the lagoon (supernatant pond)	N/A	N/A	N/A
7	Current volume of the lagoon (supernatant pond)	N/A	N/A	N/A
8	Current volume of stored tailings	0.28 million metric tons	0.37 million metric tons	0.13 million metric tons
9	Process water recovery capacity/rate (avg) from the TSF	N/A	N/A	N/A
10	Final maximum tailings dam height and crest elevation (as currently approved in permit)	N/A	N/A	N/A
11	Final crest width and crest length (as approved)	N/A	N/A	N/A
12	Final overall upstream / downstream slopes (as approved)	N/A	N/A	N/A

13	Final surface area of the entire TSF footprint at closure (as approved)	N/A	N/A	N/A
14	Maximum approved TSF tailings storage capacity	N/A	N/A	N/A
15	Current in situ density of stored tailings (avg)	110 lbs/cu.ft.	110 lbs/cu.ft.	110 lbs/cu.ft.
16	Inflow Design Flood (IDF) (PMF, etc) value	PMP (3,418 cfs Peak Discharge)	PMP (3,418 cfs Peak Discharge)	PMP (3,418 cfs Peak Discharge)
17	Seismic design event (MCE, etc) value	10,000-year AEP, 0.14 PGA	10,000-year AEP, 0.14 PGA	10,000-year AEP, 0.14 PGA
18	Tailings deposition starting year	1968	1968	1955
19	Remaining life of the facility (year)	N/A	N/A	N/A
20	Design ore throughput to TSF (dry tailings, average tpd)	N/A	N/A	N/A

APPENDIX F – AERIAL VIEWS AND SELECT SITE VISIT PHOTOS

EXISTING BRUCE TSFs

Site layout and plan view of existing Bruce TSFs (Source: AECOM, Design Basis Report, April 2024)

Select photos – Bruce Mine Site TSFs, taken during the October 14, 2024 site visit






APPENDIX G – EXISTING BRUCE MINE SITE TSFS - 2025 GISTM TABLE OF CONFORMANCE

Freeport-McMoRan Inc. (“FCX”), Bruce Mine Site, AZ, USA
Table of Conformance – GISTM Independent Assurance Verification
Date of completion reflected: July 24, 2025
Additional documents submitted by FCX on or before August 07, 2025
Bruce Tailings Storage Facility (TSF)[1]

[1] NOTE: This table of conformance is prepared jointly for the Bruce TSFs, for reasons presented in the report, and aligned with the FCX self-assessment. Ratings and comments are common for all three facilities, being adjacent to each other, unless otherwise noted in writing.

GISTM Requirements	ICMM Conformance Protocol Criteria	PACE Rating	Independent Verifiers Assessment Comments	Independent Verifiers Recommendations for Improvement
TOPIC I: AFFECTED COMMUNITIES				
PRINCIPLE 1: Respect the rights of project-affected people and meaningfully engage them at all phases of the tailings facility lifecycle, including closure.				
REQUIREMENT 1.1: Demonstrate respect for human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), conduct human rights due diligence to inform management decisions throughout the tailings facility lifecycle and address the human rights risks of tailings facility credible failure scenarios. For existing facilities, the Operator can initially opt to prioritise salient human rights issues in accordance with the UNGP.	The following are demonstrated: a. Operator has a policy commitment to respect human rights in accordance with the UNGPs. b. Operator has conducted a site-specific human rights due diligence process to inform management decisions throughout the tailings lifecycle. c. Operator has addressed the human rights risks of tailings facility credible failure scenarios where such scenarios exist for a given facility.	**M**	- Corporate human rights policy and procedures in place - Human rights analysis for the site was included in work for Bagdad site in 2022 and updated in social impact assessment completed in 2023 - Potential human rights risks are being addressed in emergency preparedness and response collaborative planning which is underway with a local rancher.	
REQUIREMENT 1.2: Where a new tailings facility may impact the rights of indigenous or tribal peoples, including their land and resource rights and their right to self- determination, work to obtain and maintain Free Prior and Informed Consent (FPIC) by demonstrating conformance to international guidance and recognised best practice frameworks.	For new facilities, the following are demonstrated: a. Operator has identified indigenous or tribal peoples1,2,3 that may be affected by a new tailings facility and understands how the rights of these groups may be impacted4, including their land and resource rights and their right to self-determination. If indigenous or tribal peoples are identified in accordance with (a), the following are demonstrated: b. Operator works to obtain and maintain FPIC from identified indigenous or tribal peoples, in conformance with international guidance and recognized best practice frameworks.	**N/A**	- No new TSFs.	
REQUIREMENT 1.3: Demonstrate that project-affected people are meaningfully engaged throughout the tailings facility lifecycle in building the knowledge base and in decisions that may have a bearing on public safety and the integrity of the tailings facility. The Operator shall share information to support this process.	The following are demonstrated: a. Operator has identified project-affected people. b. Operator has undertaken meaningful engagement with project-affected people throughout the tailings facility lifecycle to: - Share relevant and accessible information about the tailing facility; - Build the knowledge base for the tailings facility, including the social, environmental and local economic context; and, - Seek feedback on decisions that may have a bearing on public safety and the integrity of the tailings facility.	**M**	- The site is remote with risks associated with credible failure scenario potentially affecting one rancher family and their business activities (due to grazing nearby the site). - Engagement with area community members on the Bruce TSFs has occurred since 2023 and is currently ongoing with the rancher family. - Engagement with the rancher family occurred in July 2025 to inform an updated EPRP as described in 13.1.	
REQUIREMENT 1.4: Establish an effective operational-level, non-judicial grievance mechanism that addresses complaints and grievances of project-affected people relating to	The following are demonstrated: a. An effective operational-level non-judicial grievance mechanism accessible to project-affected people has been developed and implemented. b. The grievance mechanism addresses complaints and grievances of project-affected people relating to the tailings facility.	**M**	- The Bruce Site's grievance mechanism is the same mechanism used for the Bagdad site given its proximity and operational status.	

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the tailings facility and provide remedy in accordance with the UNGP.	c. The grievance mechanism provides remedy in accordance with the UNGPs 29- 31.		- The mechanism is used and consistently reviewed for alignment with UNGPs. - No grievances have been registered for the Bruce site	
Topic II: Integrated Knowledge Base				
PRINCIPLE 2: Develop and maintain an interdisciplinary knowledge base to support safe tailings management throughout facility lifecycle including closure				
REQUIREMENT 2.1: Develop and document knowledge about the social, environmental and local economic context of the tailings facility, using approaches aligned with international best practices. Update this knowledge at least every five years, and whenever there is a material change either to the tailings facility or to the social, environmental and local economic context. This knowledge should capture uncertainties due to climate change.	The following are demonstrated: a. Operator has documented the site-specific social, environmental and economic context in relation to its tailings facility. b. Evaluate uncertainties associated with climate change that may impact upon the safety of the tailings facility (see also GISTM requirement 3.1). c. Operator updates the above information at least at five-year intervals, and whenever there is a material change to the tailings facility or related environmental, social or economic context.	**M**	- Knowledge base noted.	- Recommended the knowledge base for social aspects could be filtered and simplified to focus on 'Social Data' or 'Social Baseline' or 'Social Performance Data'. At the moment, data is filtered at a fine granularity and therefore fragmented in such a way that relevant information may be missed by a non-social professional not knowing the key words to use.
REQUIREMENT 2.2: Prepare, document and update a detailed site characterisation of the tailings facility site(s) that includes data on climate, geomorphology, geology, geochemistry, hydrology and hydrogeology (surface and groundwater flow and quality), geotechnical, and seismicity. The physical and chemical properties of the tailings shall be characterised and updated regularly to account for variability in ore properties and processing.	The following are demonstrated: a. A detailed site characterisation1 of the tailings facility site(s) exists and it is updated as warranted throughout the lifecycle to reflect material changes in conditions and new knowledge. b. Site characterisation is supported by data including site-specific climate, geomorphology, geology, geochemistry, hydrology, and hydrogeology (surface and groundwater flow and quality), geotechnical, and seismicity. c. Tailings characterisation exists, considering the physical and geochemical properties, and it is updated throughout the lifecycle to account for variability in ore properties, processing, and tailings deposition.	**M**	- Knowledge base noted with relevant info and documentation. Prepared in Excel. - Pilot project for on-line database for all FCX sites is in progress.	- Bruce Site has been inactive since 1987 with some reclamation works implemented up to 1996. Presently is part of the VRP program. - It might be useful long term to improve the site knowledge with respect to Hydrogeology aspects that are nor presently well understood. - No matter what the next steps (relocation or remediation in place) hydrogeology modeling would allow/help development / establishing of post-remediation site objectives that are quantifiable.
REQUIREMENT 2.3: Develop and document a breach analysis for the tailings facility using a methodology that considers credible failure modes, site conditions, and the properties of the slurry. The results of the analysis shall estimate the	The following are demonstrated: a. Where a tailings facility has a credible failure mode / scenario, there is a documented breach analysis for the tailings facility using a methodology that considers credible failure modes, site conditions and properties of the tailings. b. The physical area potentially affected by a failure is estimated and defined.	**M**	- No flow failure mode. - Runout analysis completed with DRUM modeling tool. - Potential impact areas noted in the report.	

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physical area impacted by a potential failure. When flowable materials (water and liquefiable solids) are present at tailings facilities with Consequence Classification of 'High', 'Very High' or 'Extreme', the results should include estimates of the physical area impacted by a potential failure, flow arrival times, depth and velocities, and depth of material deposition. Update whenever there is a material change either to the tailings facility or the physical area impacted.	c. For facilities with credible failure scenarios involving flowable materials (water and liquefiable solids) and with consequence classification of 'High', 'Very High' or 'Extreme' or greater, the flow arrival times, flow depths, flow velocities, and depth of deposited material are estimated. d. For facilities meeting all the conditions of a, b and c, a breach analysis is completed / updated if there is a material change1 to the tailings facility or to the knowledge base that results in a credible failure scenario that could lead to a flow failure.		- Completed using conservative assumptions in the stability analyses.	
REQUIREMENT 2.4: In order to identify the groups most at risk, refer to the updated tailings facility breach analysis to assess and document potential human exposure and vulnerability to tailings facility credible failure scenarios. Update the assessment whenever there is a material change either to the tailings facility or to the knowledge base.	The following are addressed and can be demonstrated: a. Groups at most risk are identified, with consideration of the breach analysis for those facilities with credible failure scenarios as per Requirement 2.3. b. Potential human exposure and vulnerability to tailings facility credible failure scenarios is documented. c. The assessment of human exposure and vulnerability is updated if there is a material change1 to the credibility of flow failure potential and the corresponding breach analysis or the knowledge base.	**M**	- Consequence classifications were noted. - Transient PAR only.	
PRINCIPLE 3: Use all elements of the knowledge base - social, environmental, local economic and technical - to inform decisions throughout the tailings facility lifecycle, including closure.				
REQUIREMENT 3.1: To enhance resilience to climate change, evaluate, regularly update and use climate change knowledge throughout the tailings facility lifecycle in accordance with the principles of Adaptive Management.	The following are demonstrated: a. To enhance resilience, climate change knowledge is regularly updated and used to evaluate risks and opportunities to the tailings facility lifecycle, in accordance with the principles of adaptive management, with the aim of enhancing resiliency to climate change.	**M**	- Climate change study noted. Same as for Bagdad.	
REQUIREMENT 3.2: For new tailings facilities, the Operator shall use the knowledge base and undertake a multi-criteria alternatives analysis of all feasible sites, technologies and strategies for tailings management. The goal of this analysis shall be to: (i) select an alternative that minimises risks to people and the environment throughout the tailings facility lifecycle; and (ii) minimise the volume of tailings and water placed in external tailings facilities. This analysis shall be reviewed by the Independent Tailings Review Board (ITRB) or a senior independent technical reviewer. For existing tailings facilities, the Operator shall periodically review and refine the tailings technologies and design, and management strategies to minimise risk and improve environmental outcomes. An exception applies to facilities that are demonstrated to be in a state of safe closure.	The following are demonstrated: a. For new tailings facilities, a multi-criteria Alternatives Analysis1 is conducted that examines feasible sites, technologies, and strategies for tailings management through the lifecycle, that aims to minimise: - risks to people and the environment. - volumes of tailings and water stored in surface facilities. b. For existing facilities that are not in a state of safe closure, there are periodic reviews of the tailings technologies, design and management strategies, and assessments of the potential to implement improvements arising from the reviews. c. For new facilities, the analysis is reviewed by the ITRB or senior independent technical reviewer.	**M**	- Multi-criteria analysis (options analysis) to be completed by Q1 2026 for closure options. Main options are tailings removal/reprocessing vs. in place risk mitigation.	
REQUIREMENT 3.3: For new tailings facilities, use the knowledge base, including uncertainties due to climate change, to assess the social, environmental and local economic impacts of the tailings facility	The following are demonstrated for new tailings facilities: a. Environmental, social and local economic impact assessments are conducted and inform the existing knowledge base.	**N/A**	- No new TSFs.	

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and its potential failure throughout its lifecycle. Where impact assessments predict material acute or chronic impacts, the Operator shall develop, document and implement impact mitigation and management plans using the mitigation hierarchy.	b. Environmental, social and local economic assessments demonstrate that climate change uncertainties are considered in assessing life of tailings facility impacts and whether there is any potential for a credible failure throughout the tailings facility lifecycle. c. Mitigation measures and management plans are developed, documented and implemented to address material chronic1 and acute2 impacts. d. Management plans are based on the principles and practice of a mitigation hierarchy and management plans for the tailings facility and are updated throughout the tailings facility lifecycle.			
REQUIREMENT 3.4: Update the assessment of the social, environmental and local economic impacts to reflect a material change either to the tailings facility or to the social, environmental and local economic context. If new data indicates that the impacts from the tailings facility have changed materially, including as a result of climate change knowledge or long-term impacts, the Operator shall update tailings facility management to reflect the new data using Adaptive Management best practices.	The following are demonstrated: a. Material change as defined by the Operator is consistently applied to trigger updates to the environmental, social and economic assessment of the tailings facility. b. Tailings facility management is updated in accordance with adaptive management best practices if new data (including climate change knowledge) indicates that the impacts from the tailings facility have changed materially.	**M**	- Options analyses to be completed and decision to be made by Q1 2026. Study will include both social and environmental aspects, as well as risk management and potential long-term impacts for each alternative.	- See note on improvements in Requirement 2.2
TOPIC III: DESIGN, CONSTRUCTION, OPERATION AND MONITORING OF THE TAILINGS FACILITY				
PRINCIPLE 4: Develop plans and design criteria for the tailings facility to minimise risk for all phases of its lifecycle, including closure and post-closure.				
REQUIREMENT 4.1: Determine the consequence of failure classification of the tailings facility by assessing the downstream conditions documented in the knowledge base and selecting the classification corresponding to the highest Consequence Classification for each category in Annex 2, Table 1. The assessment and selection of the classification shall be based on credible failure modes and shall be defensible and documented.	The following are demonstrated: a. Determine the consequence of failure classification of the tailings facility by assessing the downstream conditions documented in the knowledge base and adopt: (i) the consequence classification for the highest level in each category in Annex 2, Table 1, or (ii) a more conservative approach by adopting 'Extreme' post-closure design loading criteria in Annex 2. b. For a(i) base the assessment and selection of classification on credible failure modes / scenarios. c. Document the assessment and selection with defensible evidence.	**M**	- Consequence classification completed for the three TSFs, based also on the DRUM simulations for runout analyses. - Transient PAR only.	
REQUIREMENT 4.2: With the objective of maintaining flexibility in the development of a new tailings facility and optimizing costs while prioritizing safety throughout the tailings facility lifecycle: a) Develop preliminary designs for the tailings facility with external loading design criteria consistent with both the consequence of failure classification selected based on current conditions and higher consequence classifications (including 'Extreme'). b) Informed by the range of requirements defined by the preliminary designs, either: 1. Implement the design for the 'Extreme' consequence classification external loading criteria; or 2. Implement the design for the current consequence classification criteria, or a higher one, and demonstrate that the feasibility, at a proof of concept level, to upgrade to the design for the 'Extreme' classification criteria is maintained throughout the lifecycle of the facility. c) If option b.2 is implemented, review the consequence of failure classification at the time of	The following are demonstrated: a. Prepare preliminary designs for the tailings facility, with consideration of the lifecycle stages, using external loading design criteria consistent with both the consequence of failure classification based on current conditions and higher Consequence Classifications (including 'Extreme'). b. Adopt (i) the 'Extreme' Consequence Classification external loading criteria, or (ii) adopt the current Consequence Classification loading criteria or a higher one, and demonstrate that the feasibility, at a proof of concept level, to upgrade to the design for the 'Extreme' classification criteria is maintained throughout the tailings facility lifecycle. c. If option b(ii) above is implemented, the Consequence Classification is reviewed at the time of the Dam Safety Review (DSR)1 and at least every five years, or sooner if there is a material change in the social, environmental and local economic context, and complete the upgrade of the tailings facility to the new Consequence Classification as determined by the DSR within three years. This review shall proceed until the tailings facility has been safely closed according to this Standard.	**M**	- Extreme events for design criteria to be adopted.	

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the Dam Safety Review (DSR) and at least every five years, or sooner if there is a material change in the social, environmental and local economic context, and complete the upgrade of the tailings facility to the new consequence classification as determined by the DSR within three years. This review shall proceed until the facility has been safely closed according to this Standard. d) The process described above shall be reviewed by the Independent Tailings Review Board (ITRB) or the senior independent technical reviewer, as appropriate for the tailings facility consequence classification. Subject to Requirement 4.7, Requirements 4.2.C and 4.2.D shall also apply to existing tailings facilities.	d. The process described in a., b., and c. shall be reviewed by the Independent Tailings Review Board (ITRB) or the senior independent technical reviewer, as appropriate for the tailings facility Consequence Classification. e. Subject to Requirement 4.7, Requirements 4.2 c. and 4.2 d. shall also apply to existing tailings facilities.			
REQUIREMENT 4.3: The Accountable Executive shall take the decision to adopt a design for the current Consequence Classification criteria and to maintain flexibility to upgrade the design for the highest classification criteria later in the tailings facility lifecycle. This decision shall be documented.	The following are demonstrated: a. Extreme loads are already in place. b. If Extreme Consequence Classification external loading criteria are not adopted, the Accountable Executive shall take the decision to adopt a design for the current Consequence Classification criteria and maintain flexibility to upgrade the design for the highest classification criteria later in the tailings facility lifecycle.	**M**	- AE approved the consequence classifications. ALARP in place.	
REQUIREMENT 4.4: Select, explicitly identify and document all design criteria that are appropriate to minimise risk for all credible failure modes for all phases of the tailings facility lifecycle.	The following are demonstrated: a. Select and identify design criteria that are appropriate to minimise risk for all credible failure modes during each phase of the tailings facility lifecycle. b. Document the rationale for the design criteria selected to minimise risk.	**M**	- DBR (Design Basis Report) noted and up to date.	
REQUIREMENT 4.5: Apply design criteria, such as factors of safety for slope stability and seepage management, that consider estimated operational properties of materials and expected performance of design elements, and quality of the implementation of risk management systems. These issues should also be appropriately accounted for in designs based on deformation analyses.	The following are demonstrated: a. Develop and apply design criteria such as factors of safety for slope stability and seepage management, for each lifecycle phase that considers: - the estimated operational properties of materials and expected performance of the design elements, and - the quality of the implementation of the risk management systems. b. Account for these design and implementation issues in assessments that are based on deformation analyses.	**M**	- Extreme events for design criteria noted. - Leading practice FoS and analyses.	
REQUIREMENT 4.6: Identify and address brittle failure modes with conservative design criteria, independent of trigger mechanisms, to minimise their impact on the performance of the tailings facility.	The following are demonstrated: a. An assessment of the potential for brittle failure modes is documented and the analyses are addressed in the Design Basis Report (DBR)2.	**M**	- Brittle failure mechanism evaluated and noted, together with potential triggers.	
REQUIREMENT 4.7: Existing tailings facilities shall conform with the Requirements under Principle 4, except for those aspects where the Engineer of Record (EOR), with review by the ITRB or a senior independent technical reviewer, determines that the upgrade of an existing tailings facility is not viable or cannot be retroactively applied.	The following are demonstrated: a. Existing tailings facilities shall conform with the Requirements under Principle 4, except for those aspects where the Engineer of Record (EOR), with review by the ITRB or a senior independent technical reviewer, as appropriate, determines that the upgrade of an existing tailings facility is not required, or viable, or cannot be retroactively applied. b. If the condition in (a.) above applies, the Accountable Executive shall approve and document the implementation of measures to reduce both the probability and the consequences of a tailings facility failure to reduce the risk to a level as low as reasonably practicable (ALARP).	**M**	- Plans are in place to minimize risks to ALARP. AE sign-off	

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In this case, the Accountable Executive shall approve and document the implementation of measures to reduce both the probability and the consequences of a tailings facility failure in order to reduce the risk to a level as low as reasonably practicable (ALARP). The basis and timing for addressing the upgrade of existing tailings facilities shall be risk-informed and carried out as soon as reasonably practicable.	c. The basis and timing for addressing the upgrade of existing tailings facilities shall be risk-informed and carried out as soon as reasonably practicable.			
REQUIREMENT 4.8: The EOR shall prepare a Design Basis Report (DBR) that details the design assumptions and criteria, including operating constraints, and that provides the basis for the design of all phases of the tailings facility lifecycle. The DBR shall be reviewed by the ITRB or senior independent technical reviewer. The EOR shall update the DBR every time there is a material change in the design assumptions, design criteria, design or the knowledge base and confirm internal consistency among these elements.	The following are demonstrated: a. The EOR shall prepare a Design Basis Report (DBR)1,2 that details the design assumptions and criteria, including operating constraints, and that provides the basis for the design of all phases of the tailings facility lifecycle. b. The DBR shall be reviewed by the ITRB or senior independent technical reviewer. c. The EOR shall update the DBR every time there is a material change in the design assumptions, design criteria, design or the knowledge base and confirm internal consistency among these elements.	**M**	- DBR prepared and submitted	
PRINCIPLE 5: Develop a robust design that integrates the knowledge base and minimizes the risk of failure to people and the environment for all stages of the tailings facility lifecycle, including closure and post-closure.				
REQUIREMENT 5.1: For new tailings facilities, incorporate the outcome of the multi-criteria alternatives analysis including the use of tailings technologies in the design of the tailings facility. For expansions to existing tailings facilities, investigate the potential to refine the tailings technologies and design approaches with the goal of minimising risks to people and the environment throughout the tailings facility lifecycle.	The following are demonstrated: a. For new tailings facilities, the design incorporates the outcomes of the alternatives analysis1 (as per Requirement 3.2). b. For expansions to existing facilities, assess the outcomes of periodic reviews of potential refinements to tailings technologies and design approaches (as per Requirement 3.2). c. Where the design differs from the alternatives analysis, there is a rationale that incorporates the goal of minimising risks to people and the environment throughout the tailings facility lifecycle.	**M**	- No new TSFs or expansions. - However, multi-criteria analyses to be used in the planned assessment of final closure option selection, currently underway, to be completed and decided by Q1 2026.	
REQUIREMENT 5.2: Develop a robust design that considers the technical, social, environmental and local economic context, the tailings facility Consequence Classification, site conditions, water management, mine plant operations, tailings operational and construction issues, and that demonstrates the feasibility of safe closure of the tailings facility. The design should be reviewed and updated as performance and site data become available and in response to material changes to the tailings facility or its performance.	The following are demonstrated: a. A robust design that considers: - The technical, social, environmental, and local economic context of the tailings facility. - The Consequence Classification, site conditions, water management, mine plant operations, tailings operational and construction issues. - The design demonstrates the feasibility of safe closure3 of the tailings facility. b. The design is reviewed and updated as performance and site data become available throughout the tailings facility lifecycle and / or in response to material changes.	**M**	- Design criteria proportional to the risks noted and consequence classification. - If closure option selected is to keep / redesign structures in place, extreme events loading conditions to be used.	

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REQUIREMENT 5.3: Develop, implement and maintain a water balance model and associated water management plans for the tailings facility, taking into account the knowledge base including climate change, upstream and downstream hydrological and hydrogeological basins, the mine site, mine planning and overall operations and the integrity of the tailings facility throughout its lifecycle. The water management programme must be designed to protect against unintentional releases.	The following are addressed and can be demonstrated: a. A water management plan that takes into account the knowledge base, the mine plan for the current state of the tailings facility lifecycle, upstream and downstream hydrological and hydrogeological basins, and the potential for climate change. b. A water balance model that considers the overall water management plan. c. The water management plan and water balance address the safety of the tailings facility and the prevention of unintentional releases.	**M**	- There is no Water Balance developed at this site, site is inactive since 1987. - No water containment in the TSFs except for small collection lined ponds. - No active or passive deposition of any kind. - Site tested / simulated for extreme rainfall events. - However, *OMS Section 2.4.2.2 Surface and Seepage Water Management*, and also *Section 3 Water Management* explain with sufficient details for this type of site the water management key aspects and provides sufficient information to meet the intent of this Requirement.	
REQUIREMENT 5.4: Address all potential failure modes of the structure, its foundation, abutments, reservoir (tailings deposit and pond), reservoir rim and appurtenant structures to minimise risk to ALARP. Risk assessments must be used to inform the design.	The following are demonstrated: a. Potential failure modes to the structure, its foundation, abutments, reservoir (tailings deposit and pond), Reservoir rim, and appurtenant structures are identified, categorized by risk assessments1, and addressed through preventative measures incorporated into the design and/or through operational controls. b. Risk assessments are used to inform the design to minimize risk to ALARP. Risk assessments should be used to determine whether the potential credible failure mode(s)/scenario are credible.	**M**	- Potential failure modes analyses completed. Note Risk Assessment report.	
REQUIREMENT 5.5: Develop a design for each stage of construction of the tailings facility, including but not limited to start-up, partial raises and interim configurations, final raise, and all closure stages.	The following are demonstrated: a. Designs are conducted for each stage of construction1 of the tailings facility, including but not limited to start-up, partial raises and interim configurations, final raise, and all closure stages prior to construction. The level of detail of the design should be commensurate with the phase of the tailings facility lifecycle.	**N/A**	- In the context of this inactive site for the last 35+ years, the requirement is irrelevant and N/A. - Closure options are currently being evaluated (see 5.1 and 5.6).	
REQUIREMENT 5.6: Design the closure phase in a manner that meets all the Requirements of the Standard with sufficient detail to demonstrate the feasibility of the closure scenario and to allow implementation of elements of the design during construction and operation as appropriate. The design should include progressive closure and reclamation during operations.	The following are demonstrated: a. The closure design meets all the Requirements of the Standard with sufficient detail to demonstrate the feasibility of the closure scenario. b. The closure design allows implementation of elements of the closure design during construction and operation, as appropriate. c. The design includes progressive closure and reclamation during operations.	**M**	- Option analysis project is currently underway, with final closure option to be selected by Q1 2026. Risk removal vs risk management (in place TSF solutions) are currently being evaluated. - Closure strategy memo noted.	

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REQUIREMENT 5.7: For a proposed new tailings facility classified as 'High', 'Very High' or 'Extreme', the Accountable Executive shall confirm that the design satisfies ALARP and shall approve additional reasonable steps that may be taken downstream, to further reduce potential consequences to people and the environment. The Accountable Executive shall explain and document the decisions with respect to ALARP and additional consequence reduction measures. For an existing tailings facility classified as 'High', 'Very High' or 'Extreme', the Accountable Executive, at the time of every DSR or at least every five years, shall confirm that the design satisfies ALARP and shall seek to identify and implement additional reasonable steps that may be taken to further reduce potential consequences to people and the environment. The Accountable Executive shall explain and document the decisions with respect to ALARP and additional consequence reduction measures, in consultation with external parties as appropriate.	The following are demonstrated: For a proposed new tailings facility, the Accountable Executive (AE) shall: a. Confirm that the design satisfies ALARP. b. Approve additional reasonable steps that may be taken downstream, to further reduce potential consequences to people and the environment. c. Explain and document the decisions with respect to ALARP and additional consequence reduction measures. For an existing tailings facility, the Accountable Executive, at the time of every DSR or at least every five years, shall: d. Confirm that the design satisfies ALARP. e. Seek to identify and implement additional reasonable steps that may be taken to further reduce potential consequences to people and the environment. f. Explain and document the decisions with respect to ALARP and additional consequence reduction measures, in consultation with external parties as appropriate.	**M**	- ALARP documentation in place. - AE approval /sign-off also noted.	
REQUIREMENT 5.8: Where other measures to reduce the consequences of a tailings facility credible failure mode as per the breach analysis have been exhausted, and pre-emptive resettlement cannot be avoided, the Operator shall demonstrate conformance with international standards for involuntary resettlement.	The following are demonstrated: a. Operators who have a facility with a credible failure mode, as per the breach analysis, have exhausted measures to reduce consequences, and cannot avoid pre-emptive resettlement. b. Operator has conformed to international standards for involuntary resettlement.	**N/A**	- No pre-emptive resettlement needed. No community.	
PRINCIPLE 6: Plan, build and operate the tailings facility to manage risk at all phases of the tailings facility lifecycle, including closure and post-closure.				
REQUIREMENT 6.1: Build, operate, monitor and close the tailings facility according to the design intent at all phases of the tailings facility lifecycle, using qualified personnel and appropriate methodology, equipment and procedures, data acquisition methods, the Tailings Management System (TMS) and the overall Environmental and Social Management System (ESMS) for the mine and associated infrastructure.	The following are demonstrated: a. The design intent, established in the DBR, is understood and implemented for construction, operation and closure for each phase of the tailings facility lifecycle. b. Construction and operating personnel assigned to tailings-related tasks are qualified based on the qualifications defined in the Tailings Management System (TMS). c. Throughout all stages of the tailings facility lifecycle the appropriate methodology, equipment and procedures1, data acquisition methods, are used and incorporated into the TMS and the Environmental and Social Management System (ESMS) for the mine and associated infrastructure. d. The TMS and the ESMS are implemented during construction, operation, and closure.	**M**	- OMS manual in place. Roles in place relevant and appropriate to an inactive site. - Annual report noted.	
REQUIREMENT 6.2: Manage the quality and adequacy of the construction and operation process by implementing Quality Control, Quality Assurance and Construction vs Design Intent Verification (CDIV). The Operator shall use the CDIV to ensure that the design intent is	The following are demonstrated: a. Quality Control1 (QC) and Quality Assurance2 (QA) programmes are established to monitor the quality and adequacy of the construction2 and operation processes. b. A CDIV programme that confirms that the design intent is met if site conditions vary from design assumptions.	**N/A**	- No construction taking place at this time. Site inactive for several decades. In situ testing completed for closure studies.	

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implemented and is still being met if the site conditions vary from the design assumptions.				
REQUIREMENT 6.3: Prepare a detailed Construction Records Report ('as-built' report) whenever there is a material change to the tailings facility, its infrastructure or its monitoring system. The EOR and the Responsible Tailings Facility Engineer (RTFE) shall sign this report.	The following are demonstrated: a. Construction Records Reports (CRR)1,2,3 are up to date and are prepared when there is a material change to the tailings facility, its infrastructure, or its monitoring system. b. The CRRs are signed by the RTFE and the EOR.	**N/A**	- No active deposition or construction for 35 years. Layouts, geometries, and some limited historic info available. Site investigations are being completed for the options analyses for closure studies.	
REQUIREMENT 6.4: Develop, implement, review annually, and update as required an Operations, Maintenance and Surveillance (OMS) Manual that supports effective risk management as part of the TMS. The OMS Manual should follow best practices, clearly provide the context and critical controls for safe operations and be reviewed for effectiveness. The RTFE shall provide access to the OMS Manual and training to all levels of personnel involved in the TMS with support from the EOR.	The following are demonstrated: a. An Operation, Maintenance and Surveillance (OMS) Manual is implemented, covers each tailings facility and includes the requirements for the OMS activities necessary for the effective risk management based on best practice. b. The OMS is reviewed annually or more frequently if there are any updates following a material change as defined by the Operator. c. The OMS provides clear context and includes the inspection, maintenance and monitoring of the requirements identified including critical controls for safe operation and is reviewed for effectiveness. d. The RTFE ensures that personnel involved in the TMS have access to the OMS Manual. e. The RTFE should provide access to training to all levels of personnel involved in the TMS.	**M**	- OMS manual in place appropriate for the inactive facilities (limited details on SOPs etc). - Issued in May 2025.	- OMS manual is succinct. More details on some of the inspection, monitoring and surveillance practices / SOPs are needed. Right now, the manual is very light, to say the least. - Training of the staff by RTFE was planned and was recently noted lacking by other reviews completed by FCX/Bruce personnel. Not yet implemented but in progress. - Training should cover all surveillance, and including environmental monitoring / water quality sampling testing, pumping system inspections and frequencies, liners, etc., other critical aspects as needed. - See Requirement 11.1.
REQUIREMENT 6.5: Implement a formal change management system that triggers the evaluation, review, approval and documentation of changes to design, construction, operation or monitoring during the tailings facility lifecycle. The change management system shall also include the requirement for the EOR to prepare a periodic Deviance Accountability Report (DAR), that provides an assessment of the cumulative impact of the changes on the risk level of the as-constructed facility. The DAR shall provide recommendations for managing risk, if necessary, and any resulting updates to the design, DBR, OMS	The following are demonstrated: a. A Change Management System1 has been established. b. The Change Management System includes processes for the identification of changes and processes for evaluation, review, approval and documentation of changes throughout the facility lifecycle. c. The Change Management System addresses and documents material changes to design, construction, operations, or monitoring. d. A DAR is periodically prepared and updated by the EOR that addresses the cumulative impact of material changes to the as-constructed facility. e. Recommendations from the DAR have been implemented through updates to the construction, operations, design, DBR, OMS Manual and the monitoring programme. f. The Accountable Executive has approved the DAR.	**N/A**	- No active construction or deposition since the mid-80s. - DAR not applicable at this site.	

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and the monitoring programme. The DAR shall be approved by the Accountable Executive.				
REQUIREMENT 6.6: Include new and emerging technologies and approaches and use the evolving knowledge in the refinement of the design, construction, and operation of the tailings facility.	The following are demonstrated: a. Reviews of new and emerging technologies and approaches for tailings management are carried out considering the tailings facility lifecycle. b. Material results of the reviews have been incorporated into refinements of the facility design, construction and operations.	M	- Technologies are already planned to be included and discussed as part of the options analyses for the closure of the site, including potential for reprocessing, earthworks and tailings removal equipment, monitoring technologies, soil remediation, etc.	
PRINCIPLE 7: Design, implement and operate monitoring systems to manage risk at all phases of the facility lifecycle, including closure.				
REQUIREMENT 7.1: Design, implement and operate a comprehensive and integrated performance monitoring programme for the tailings facility and its appurtenant structures as part of the TMS and for those aspects of the ESMS related to the tailings facility in accordance with the principles of Adaptive Management.	The following are demonstrated: a. A comprehensive and integrated performance monitoring programme for the tailings facility and its appurtenant structures has been developed, and forms part of the TMS, and includes activities for inspection, reviews, and monitoring requirements in alignment with the facility OMS. b. Aspects of the ESMS that are linked to tailings facility's performance monitoring are identified and included in the performance monitoring program. c. The performance monitoring programme is integrated and reflects other programs such as the OMS and is updated in keeping with the principles of Adaptive Management.	M	- In addition to the OMS, Bruce Stormwater Pollution Prevention Plan is noted. - Current monitoring in line with risk profile for the inactive sites.	
REQUIREMENT 7.2: Design, implement and operate a comprehensive and integrated engineering monitoring system that is appropriate for verifying design assumptions and for monitoring potential failure modes. Full implementation of the Observational Method shall be adopted for non-brittle failure modes.	The following are demonstrated: a. A comprehensive and integrated engineering monitoring system1 has been designed and used to verify design assumptions and to monitor potential failure modes. b. Monitoring procedures for non-brittle failure modes are developed and implemented to support the Observational Method. c. Brittle failure modes are addressed by conservative design criteria.	M	- See additional info on the APP permit. - Appropriate for the risk profile.	- Water quality monitoring to be considered prior, during and after closure works implementation.
REQUIREMENT 7.3: Establish specific and measurable performance objectives, indicators, criteria, and performance parameters and include them in the design of the monitoring programmes that measure performance throughout the tailings facility lifecycle. Record and evaluate the data at appropriate frequencies. Based on the data obtained, update the monitoring programmes throughout the tailings facility lifecycle to confirm that they remain effective to manage risk.	The following are demonstrated: a. Performance objectives, indicators and criteria are set that measure the performance of the tailings facility. These are specific and measurable and included in the monitoring programmes. b. Routine and regular inspecting, monitoring, testing, recording, evaluating and reporting of the data from the monitoring programmes is conducted according to the established appropriate frequency. c. The monitoring programme is updated throughout the tailings facility lifecycle based on the evaluation of the data to confirm that the performance objectives, indicators and criteria remain effective to manage risk.	M	- Monitoring currently focussing on physical stability. - Performance objectives to be set depending on the closure option. - See KPI Dashboard as well.	- Team to establish site-specific performance objectives during and after closure implementation. Include both physical and chemical stability. In case of removal, include objectives for soil and water quality objectives once removal is complete. Implement rehabilitation plan to achieve such objectives. - Complete water quality study to act as a "baseline" / reference point prior to any closure option to be put in place.

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				- Establish water quality monitoring program during closure activities and into post-closure
REQUIREMENT 7.4: Analyse technical monitoring data at the frequency recommended by the EOR, and assess the performance of the tailings facility, clearly identifying and presenting evidence on any deviations from the expected performance and any deterioration of the performance over time. Promptly submit evidence to the EOR for review and update the risk assessment and design, if required. Performance outside the expected ranges shall be addressed promptly through Trigger Action Response Plans (TARPs) or critical controls.	The following are demonstrated: a. The tailings facility performance is assessed by analyzing technical monitoring data at a frequency established by the EOR. b. The analysis of tailings facility technical monitoring data clearly identifies and presents evidence on deviations from the expected performance objectives and deterioration of the tailings facility performance over time. c. The results from the tailings facility performance monitoring analysis are promptly reported to the EOR. d. The EOR promptly reviews the tailings facility performance monitoring analysis results and if required, directs that the risk assessment and design be updated. e. Performance expectations are incorporated into Trigger Action Response Plans or critical controls as criteria to state when action is or is not needed.	**M**	- Stability / InSAR data analyzed. - EOR inspection reports - KPI Dashboard	- Ensure better and more granular representation of InSAR data and its analyses.
REQUIREMENT 7.5: Report the results of each of the monitoring programmes at the frequency required to meet company and regulatory requirements and, at a minimum, on an annual basis. The RTFE and the EOR shall review and approve the technical monitoring reports.	The following are demonstrated: a. The results of the monitoring programmes are reported at a frequency that meets company expectations and regulatory requirements and at a minimum is completed annually. b. Technical monitoring reports are reviewed and approved by the RTFE and the EOR.	**M**	- EOR TSF annual reporting, to continue. - KPI Dashboard	- See also 7.4 above.
TOPIC IV: MANAGEMENT AND GOVERNANCE				
PRINCIPLE 8: Establish policies, systems and accountabilities to support the safety and integrity of the tailings facility.				
REQUIREMENT 8.1: The Board of Directors shall adopt and publish a policy on or commitment to the safe management of tailings facilities, to emergency preparedness and response, and to recovery after failure.	The following are demonstrated: a. A documented corporate tailings management policy that commits the Operator to the safe management of tailings, development of emergency response plans, and mechanisms for recovery after failure. This may be in the form of a standalone policy or embedded in a document that the Board of Directors adopts. b. The policy and its endorsement by the Board of Directors is in writing and is publicly available.	**M**	- Policy published.	
REQUIREMENT 8.2: Establish a tailings governance framework and a performance based TMS and ensure that the ESMS and other critical systems encompass relevant aspects of the tailings facility management.	The following are demonstrated: a. A performance based TMS , follows established Plan-Do-Check-Act processes and is suitable for the organization and its tailings facilities. b. Accountabilities, responsibilities and associated competencies for the implementation of that framework are defined that supports appropriate identification and management of tailings facility risks. c. The governance framework supports the TMS, its relevant critical systems and other related ESMS. d. The linkages between the TMS and other systems such as the ESMS are clear to ensure effective integrated management of the tailings facility.	**M**	- TMS and ESMS documents noted. Linkage between the two noted.	
REQUIREMENT 8.3: For roles with responsibility for tailings facilities, develop mechanisms such that incentive payments or performance reviews are based, at least in part, on public safety and the integrity of the tailings facility. These incentive payments shall reflect the degree to which public safety and the integrity of the tailings facility are part of the role. Long-term incentives for relevant	The following are demonstrated: a. For persons with responsibility for tailings facilities, their performance reviews and or incentive payments are based in part, on public safety and the integrity of the tailings facilities. b. Where incentive payments are used, they are based on the degree to which public safety and tailing facility integrity are a component of that role. c. Long-term incentives, as part of executive compensation, take tailings management, facility performance, and public safety into account.	**M**	- Incentive payments part of The Corporate documents with noted mandate. - Confirmed verbally in the meeting that it applies also to inactive or closed sites, including Bruce.	

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executive managers should take tailings management into account.				
REQUIREMENT 8.4: Appoint one or more Accountable Executives who is/are directly answerable to the CEO on matters related to this Standard. The Accountable Executive(s) shall be accountable for the safety of tailings facilities and for avoiding or minimising the social and environmental consequences of a tailings facility failure. The Accountable Executive(s) shall also be accountable for a programme of tailings management training, and for emergency preparedness and response. The Accountable Executive(s) must have scheduled communication with the EOR and regular communication with the Board of Directors, which can be initiated either by the Accountable Executive(s), or the Board. The Board of Directors shall document how it holds the Accountable Executive(s) accountable.	The following are demonstrated: a. Accountable Executive(s) who is directly answerable to the CEO have been identified and assigned the safety aspects of a tailings facility and for avoiding or minimising the social and environmental consequences of a tailings facility failure. b. The accountability1 referred to in (a) includes developing and implementing a program of tailings management training, and for emergency preparedness and response. c. The Accountable Executive(s) has regular and scheduled communications with the EOR and Board of Directors which can be initiated either by the Accountable Executive or the Board. d. The process by which the Board of Directors holds the Accountable Executive(s) responsible is documented.	**M**	- AE appointed and noted. Also, the Director - Reclamation and Discontinued Sites noted in the org charts and in communications. - CRC	
REQUIREMENT 8.5: Appoint a site-specific Responsible Tailings Facility Engineer (RTFE) who is accountable for the integrity of the tailings facility, who liaises with the EOR and internal teams such as operations, planning, regulatory affairs, social performance and environment, and who has regular two-way communication with the Accountable Executive. The RTFE must be familiar with the DBR, the design report and the construction and performance of the tailings facility.	The following are demonstrated: a. A Responsible Tailings Facility Engineer (RTFE)1 is appointed to the role. b. Roles and responsibilities are clearly defined and documented for the RTFE position including accountability for the integrity of the tailings facility. c. The RTFE liaises with the EOR and internal teams. d. The RTFE must be familiar with the DBR, relevant design reports, and the construction and operations/performance of the tailings facility. e. Communication occurs between the RTFE and the Accountable Executive, or designee.	**M**	- RTFE appointed and confirmed. - R&R noted in the FCX internal guidance documents.	
REQUIREMENT 8.6: Identify appropriate qualifications and experience requirements for all personnel who play safety-critical roles in the operation of a tailings facility, including, but not limited to the RTFE, the EOR and the Accountable Executive. Ensure that incumbents of these roles have the identified qualifications and experience, and develop succession plans for these personnel.	The following are demonstrated a. Qualification and experience requirements for all personnel with safety critical roles are clearly defined and are appropriate to the level of responsibility for that position. This includes but is not limited to critical roles such as the RTFE, EOR and Accountable Executives. b. Succession plans are developed for safety-critical roles.	**M**	- Required qualifications and experience noted in FCX documents. CVs also noted.	
REQUIREMENT 8.7: For tailings facilities with Consequence Classification of 'Very High' or 'Extreme', appoint an Independent Tailings Review Board (ITRB). For all other facilities, the Operator may appoint a senior independent technical reviewer. The ITRB or the reviewer shall be appointed early in the project development process, report to the Accountable Executive and certify in writing that they follow best practices for engineers in avoiding conflicts of interest.	The following are demonstrated: a. For a tailings facility with a consequence classification of failure of "Very High" to "Extreme", the Operator has appointed an Independent Tailings Review Board (ITRB). b. For a tailings facility with a consequence classification of failure of "High" or lower, in the absence of an ITRB, the Operator has appointed a senior independent technical reviewer. c. The ITRB or a senior independent technical reviewer report to the Accountable Executive for the tailings facility or delegate. d. The ITRB or a senior independent technical reviewer is appointed during the early phase of tailings facility site investigation and design engineering (suggested pre-feasibility). e. The ITRB members and a senior independent technical reviewer have certified in writing the absence of a conflict of interest with the tailings facility as defined by best practice.	**M**	- Quality ITRB in place and composition noted. Contracts noted.	

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PRINCIPLE 9: Appoint and empower an Engineer of Record.				
REQUIREMENT 9.1: Engage an engineering firm with expertise and experience in the design and construction of tailings facilities of comparable complexity to provide EOR services for operating the tailings facility and for closed facilities with 'High', 'Very High' and 'Extreme' Consequence Classification, that are in the active closure phase. Require that the firm nominate a senior engineer, approved by the Operator, to represent the firm as the EOR, and verify that the individual has the necessary experience, skills and time to fulfil this role. Alternatively, the Operator may appoint an in-house engineer with expertise and experience in comparable facilities as the EOR. In this instance, the EOR may delegate the design to a firm ('Designer of Record') but shall remain thoroughly familiar with the design in discharging their responsibilities as EOR. Whether the EOR or the DOR is in-house or external, they must be competent and have experience appropriate to the Consequence Classification and complexity of the tailings facility.	The following are demonstrated: a. For all operating tailings facilities, and for closed facilities with consequence categories of "High', 'Very High' and 'Extreme' an engineering firm which has the design and construction expertise for tailings facilities of comparable complexity has been engaged. b. The appointed Engineer of Record (EOR)1 has experience and expertise commensurate with the complexity of the tailings facility and the consequence class and the appointment has been approved by the Operator. c. A DOR1, if appropriate either due to selection of an EOR internal to the Operator or other circumstances, is appointed that meets the essential qualifications and requirements of the EOR.	M	- EOR selected and in place. - Quality team meetings in place.	
REQUIREMENT 9.2: Empower the EOR through a written agreement that clearly describes their authority, role and responsibilities throughout the tailings facility lifecycle, and during change of ownership of mining properties. The written agreement must clearly describe the obligations of the Operator to the EOR, to support the effective performance of the EOR.	The following are demonstrated: a. An EOR is appointed and in place at all times throughout the tailings facility lifecycle. The appointed EOR may change during the tailings facility lifecycle. b. The EOR is appointed through a written agreement that clearly describes their authority, role and responsibilities throughout the tailings facility lifecycle, and during change of ownership of mining properties. c. The written agreement clearly describes the obligations of the Operator to the EOR, to support the effective performance1 of the EOR during the tailings facility lifecycle.	M	- EOR contract in place. - Continuity noted for the EOR team/Company (AECOM).	
REQUIREMENT 9.3: Establish and implement a programme to manage the quality of all engineering work, the interactions between the EOR, the RTFE and the Accountable Executive, and their involvement in the tailings facility lifecycle as necessary to confirm that both the implementation of the design and the design intent are met.	The following are demonstrated: a. A programme is established to manage the quality of all engineering work and interactions between the EOR, the RTFE and the Accountable Executive. b. The established programme is implemented to manage the quality of all engineering work and the interactions between the EOR, the RTFE and the Accountable Executive. c. The programme, developed by the Operator, covers the involvement of the EOR, the RTFE and the Accountable Executive in the tailings facility lifecycle as necessary to confirm that both the implementation of the design and the design intent are met.	M	- EOR scope of work presented. - Regular meetings noted with RTFE and AE and other key personnel.	
REQUIREMENT 9.4: Given its potential impact on the risks associated with a tailings facility, the selection of the EOR shall be decided by the Accountable Executive and informed, but not decided, by procurement personnel.	The following are demonstrated: a. The risks and associated potential impacts with a tailings facility are considered by the Accountable Executive in selecting the EOR. b. The selection of the EOR shall be decided by the Accountable Executive and informed1, but not decided, by procurement personnel. c. EOR selection is consistent with Requirement 9.1.	M	- Approved by the AE.	-
REQUIREMENT 9.5: Where it becomes necessary to change the EOR (whether a firm or an inhouse	The following are demonstrated: a. A succession plan is in place when it is necessary to change the EOR1 (whether a firm or within a firm, or	M	- EOR change management process noted.	

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employee), develop a detailed plan for the comprehensive transfer of data, information, knowledge and experience with the construction procedures and materials.	an in-house employee) b. The succession plan includes the comprehensive transfer of data, information, knowledge and experience with the construction procedures and materials.			
PRINCIPLE 10: Establish and implement levels of review as part of a strong quality and risk management system for all phases of the tailings facility lifecycle, including closure.				
REQUIREMENT 10.1: Conduct and update risk assessments with a qualified multi-disciplinary team using best practice methodologies at a minimum every three years and more frequently whenever there is a material change either to the tailings facility or to the social, environmental and local economic context. Transmit risk assessments to the ITRB or senior independent technical reviewer for review, and address with urgency all unacceptable tailings facility risks.	The following are demonstrated: a. A risk assessment process is in place for the tailings facility and is based on an up to date knowledge base for the tailings facility. b. The risk assessment is updated at least every three years and more frequently whenever there is a material change either to the tailings facility or to the social, environmental and local economic context. c. Risk assessment scope to include the full potential area of influence of the tailings facility, and to actively incorporate industry experience in risk assessment. d. Sources of risk are regularly identified, assessed and managed at all phases of the tailings facility lifecycle, including projected climate change impacts under a range of credible future climate scenarios. e. A multi-disciplinary team is qualified to undertake the risk assessment specific to the phase of the tailings facility lifecycle (i.e. construction, operation, suspension, expansion, closure) and has the ability to apply best practice methodology in a cross-functional manner. f. Following review by the ITRB or senior independent technical reviewer, action plans are prepared, implemented and reported when risk assessments identify unacceptable tailings facility risks.	**M**	- RA and FMEA completed. - Risk reviews to be included in the options analysis for final preferred closure. Option analysis to be completed by Q1 2026 using a multi-disciplinary team.	
REQUIREMENT 10.2: Conduct regular reviews of the TMS and of the components of the ESMS that refer to the tailings facility to assure the effectiveness of the management systems. Document and report the outcomes to the Accountable Executive, Board of Directors, and project-affected people. The review shall be undertaken by senior technical reviewers with the appropriate qualifications, expertise and resources. For tailings facilities with 'High', 'Very High' or 'Extreme' Consequence Classification, conduct the review at least every three years.	The following are demonstrated: a. The TMS and components of the ESMS are reviewed sufficiently often to assure that the tailings facility management system is effective and applicable for the risks across the full lifecycle of the facility. b. The outcomes of the TMS and ESMS reviews are documented and reported to the Accountable Executive, Board of Directors, and project-affected people. c. The review shall be undertaken by senior technical reviewers with the appropriate qualifications, expertise and resources. d. For tailings facilities with 'High', 'Very High' or 'Extreme' Consequence Classification, the review is conducted at least every three years.	**M**	- TMS and ESMS reviews completed.	
REQUIREMENT 10.3: Conduct internal audits to verify consistent implementation of company procedures, guidelines and corporate governance requirements consistent with the TMS and aspects of the ESMS developed to manage tailings facility risks.	The following are demonstrated: a. Internal audits are completed at a frequency to ensure consistent implementation of established requirements that related to company procedures, guidelines and corporate governance1 requirements that is consistent with the TMS and aspects of the ESMS relating to tailings facility risks.	**M**	- Site specific reviews.	
REQUIREMENT 10.4: The EOR or senior independent technical reviewer shall conduct tailings facility construction and performance reviews annually or more frequently, if required.	The following are demonstrated: a. An annual tailings facility review1 is conducted throughout the construction and operational periods to assess condition and performance. The reviews are performed by the EOR or the senior independent technical reviewer, as assigned for the tailings facility, and the review is documented. Reviews may be conducted more frequently, if required by identified issues or the implementation of necessary corrective measures.	**M**	- EOR reviews and site investigations.	
REQUIREMENT 10.5: Conduct an independent DSR at least every five years for tailings facilities with 'Very High' or 'Extreme' Consequence Classifications and at least every 10 years for all	The following are demonstrated: a. DSRs are conducted and documented: - every five years for tailings facilities with 'Very High' or 'Extreme' Consequence Classifications. - every 10 years for all other facilities, or,	**M**	- Stewardship review in place.	

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other facilities. For tailings facilities with complex conditions or performance, the ITRB may recommend more frequent DSRs. The DSR shall include technical, operational and governance aspects of the tailings facility and shall be completed according to best practices. The DSR contractor cannot conduct consecutive DSRs on the same tailings facility and shall certify in writing that they follow best practices for engineers in avoiding conflicts of interest.	- more frequently as recommended by the ITRB. b. DSRs include technical3, operational4 and governance5 aspects of the tailings facility and shall be completed according to best practice2. c. DSR individual cannot conduct consecutive DSRs on the same tailings facility. d. DSR individuals certify in writing that they follow best practices for engineers in avoiding conflicts of interest.			
REQUIREMENT 10.6: For tailings facilities with 'Very High' or 'Extreme' Consequence Classifications, the ITRB, reporting to the Accountable Executive shall provide ongoing senior independent review of the planning, siting, design, construction, operation, water and mass balance, maintenance, monitoring, performance and risk management at appropriate intervals across all phases of the tailings facility lifecycle. For tailings facilities with other Consequence Classifications, this review can be done by a senior independent technical reviewer.	The following are demonstrated: a. For tailings facilities with 'Very High' or "Extreme" Consequence Classifications, the ITRB1, reporting to the Accountable Executive provides ongoing senior independent technical review of the planning, siting, design, construction, operation, water and mass balance, maintenance, monitoring, performance and risk management at appropriate intervals across all phases of the tailings facility lifecycle. b. For tailings facilities with other Consequence Classifications, this review can alternatively be performed by a senior independent technical reviewer. c. The ongoing reviews are conducted at appropriate intervals across all phases of the tailings facility lifecycle.	**M**	- ITRB review in place.	
REQUIREMENT 10.7: The amount of estimated costs for planned closure, early closure, reclamation, and post-closure of the tailings facility and its appurtenant structures shall be reviewed periodically to confirm that adequate financial capacity (including insurance, to the extent commercially reasonable) is available for such purposes throughout the tailings facility lifecycle, and the conclusions of the review shall be publicly disclosed annually. Disclosure may be made in audited financial statements or in public regulatory filings. Subject to the provisions of local or national regulations on this matter, Operators shall use best efforts to assess and take into account the capability of an acquirer of any of its assets involving a tailings facility (through merger, acquisition, or other change in ownership) to maintain this Standard for the tailings facility lifecycle.	The following are demonstrated: a. A process and governance mechanisms have been established for closure planning and closure cost estimating. b. A closure plan1 for the tailings facility has been established and associated closure cost estimates has been prepared. c. Closure cost estimates1 are reviewed periodically and public disclosure2 is made annually to confirm that adequate financial capacity (including insurance, to the extent commercially reasonable) is in place to meet the closure requirements and expected timing for the tailings facility in their current state. d. If any of an Operator's assets involving a tailings facility underwent a change in Ownership since the last review, the Operator must provide documentation that they assessed and took into account the capability of an acquirer to maintain this Standard (subject to provisions of local/national regulations).	**M**	- Site is under VRP State of Arizona since 2005. Site has been remediated between 1987-1992, following the legal requirements at that time. - Inactive for almost four decades. - Presently, there is a Closure Strategy memorandum in place, and an Option Analysis is underway to determine best option for closing the site. A decision is expected in Q1 2026.	
PRINCIPLE 11: Develop an organisational culture that promotes learning, communication and early problem recognition.				
REQUIREMENT 11.1: Educate personnel who have a role in any phase of the tailings facility lifecycle	The following are demonstrated: a. The Operator has developed an educational program inclusive of job procedures and responsibilities for	**M**	- Note section 1.4.2.2 of the OMS Manual that discusses	- Training documentation on OMS manual and SOPs

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about how their job procedures and responsibilities relate to the prevention of a failure.	prevention of a failure. b. Those with roles for preventing a failure in any phase of the tailing facility lifecycle is included in the education program.		the external training/conference participation. Section 1.4.2.3 notes onboarding training for new personnel, however none presented. - Folder provided with training internal/external. - Limited evidence on who participated. - Training on EPRP available. - External training noted, conferences, workshops, etc.	is very limited. A more robust training program needs to be defined and completed, including key supporting evidence on who presented what, and who participated/ signature lists.
REQUIREMENT 11.2: Establish mechanisms that incorporate workers' experience-based knowledge into planning, design and operations for all phases of the tailings facility lifecycle.	The following are demonstrated: a. Mechanisms have been established that incorporate workers' experience-based knowledge into planning, design and operations for all phases of the tailings facility lifecycle.	**M**	- Internal weekly meetings - Monthly meetings with EOR.	
REQUIREMENT 11.3: Establish mechanisms that promote cross-functional collaboration to ensure effective data and knowledge sharing, communication and implementation of management measures to support public safety and the integrity of the tailings facility.	The following are demonstrated: a. The Operator has established mechanisms that promote cross-functional collaboration to support public safety and the integrity of the tailings facility through: - effective data and knowledge sharing, - effective communication, and - implementation of management measures.	**M**	- Joint meetings with other departments / enviro / others and also staff from Bagdad.	
REQUIREMENT 11.4: Identify and implement lessons from internal incident investigations and relevant external incident reports, paying particular attention to human and organisational factors.	The following are demonstrated: a. The Operator has identified and implemented lessons from internal incident investigations. b. The Operator has identified and implemented lessons from relevant external incident reports. c. Internal and external incident lessons learned pay particular attention to human and organisational factors.	**M**	- Lessons learned during presentations (externals) and internal TCLW meetings.	
REQUIREMENT 11.5: Establish mechanisms that recognise, reward and protect from retaliation, employees and contractors who report problems or identify opportunities for improving tailings facility management. Respond in a timely manner and communicate actions taken and their outcomes.	The following are demonstrated: a. The Operator has established a documented mechanism1 that recognises, rewards and protects employees and contractors who report problems or identify opportunities for improving tailings facility management. b. The Operator has responded in a timely manner and communicated to employees and contractors the actions taken in response to concerns and opportunities raised.	**M**	- The mechanism given the status of the operation and proximity to an active operation is the same as for Bagdad site. This has been verified with corporate leadership.	
PRINCIPLE 12: Establish a process for reporting and addressing concerns and implement whistleblower protections.				
REQUIREMENT 12.1: The Accountable Executive shall establish a formal, confidential and written process to receive, investigate and promptly address concerns from employees and contractors about possible permit violations or other matters relating to regulatory compliance, public safety, tailings facility integrity or the environment.	The following can be demonstrated: a. Accountable Executive has established a formal, confidential and written process to receive, investigate and promptly address concerns from employees and contractors related to the tailings facility, including possible permit violations or other matters related to regulatory compliance, public safety, tailings facility integrity or the environment.	**M**	- The mechanism given the status of the operation and proximity to an active operation is the same as for Bagdad site. This has been verified with corporate leadership. - There has been no submissions for the Bruce site.	

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REQUIREMENT 12.2: In accordance with international best practices for whistleblower protection, the Operator shall not discharge, discriminate against, or otherwise retaliate in any way against a whistleblower who, in good faith, has reported possible permit violations or other matters relating to regulatory compliance, public safety, tailings facility integrity or the environment.	The following can be demonstrated: a. The Operator maintains whistleblower protection practices that do not discharge, discriminate or retaliate against a whistleblower who in good faith reports possible violations relating to regulatory compliance, public safety, tailings facility integrity or the environment.	**M**	- See comments in 12.1	
TOPIC V: EMERGENCY RESPONSE AN LONG-TERM RECOVERY				
PRINCIPLE 13: Prepare for emergency response to tailings facility failures.				
REQUIREMENT 13.1: As part of the TMS, use best practices and emergency response expertise to prepare and implement a site-specific tailings facility Emergency Preparedness and Response Plan (EPRP) based on credible flow failure scenarios and the assessment of potential consequences. Test and update the EPRP at all phases of the tailings facility lifecycle at a frequency establish catastrophic ed in the plan, or more frequently if triggered by a material change either to the tailings facility or to the social, environmental and local economic context. Meaningfully engage with employees and contractors to inform the EPRP, and co-develop community-focused emergency preparedness measures with project-affected people.	The following are demonstrated: a. The Tailings Management System (TMS) includes a site-specific tailings facility Emergency Preparedness and Response Plan (EPRP). The EPRP includes specific actions to both prepare, to manage an escalating event, and to respond after an event has occurred. b. The tailings facility EPRP is responsive to credible flow failure scenarios and the assessment of potential consequences, and clearly identifies potentially affected areas and the approximate degree of expected consequences. c. The EPRP was developed with input from appropriate expertise in emergency response, site operation and project affected people using best practices. d. The tailings facility EPRP for operating facilities is tested and reviewed based on the process and frequency specified in the plan, every 3 years, or more frequently if triggered by a material change to the tailings facility or to the social, environmental or economic context occur. Reference R. 13.2 and R. 13.3. e. EPRP development and updates involve meaningful engagement of employees, contractors, community emergency response providers, and project-affected people are engaged to co-develop community-focused emergency preparedness and communication of the plan to project-affected peoples.	**M**	- EPRP in draft was provided. - Follows the FCX's Crisis Management Plan. Noted in Annex D. - Enviro and Social Teams involved in exercise. - To be finalized in October 2025 following feedback and lessons learned from the simulations.	
REQUIREMENT 13.2: Engage with public sector agencies, first responders, local authorities and institutions and take reasonable steps to assess the capability of emergency response services to address the hazards identified in the tailings facility EPRP, identify gaps in capability and use this information to support the development of a collaborative plan to improve preparedness.	Based on the nature of the emergency preparedness and response requirements for a given facility, following conformance with Requirement 13.1, the following are demonstrated: a. Operator has identified public sector agencies, first responders, local authorities and institutions that would participate in any emergency response to tailings facility failures. b. Operator has engaged with identified organizations. c. Operator has taken reasonable steps to assess the capability of identified organizations to address the hazards identified in the tailings facility EPRP, to identify gaps in capability, and to use this information to support the development of a collaborative plan to improve preparedness if gaps are identified.	**M**	- Bagdad Crisis Management Plan includes list of agencies and stakeholders. - Tabletop exercise with external agencies planned for September 2025. -	
REQUIREMENT 13.3: Considering community-focused measures and public sector capacity, the Operator shall take all reasonable steps to maintain a shared state of readiness for tailings facility credible flow failure scenarios by securing resources and carrying out annual training and exercises. The Operator shall conduct emergency response simulations at a frequency established in the EPRP	The following are demonstrated: a. The Operator incorporates knowledge of community-focused measures and public sector capacity when establishing a state of readiness in the EPRP. b. The Operator has taken all reasonable steps to maintain a shared state of readiness by engaging with public sector agencies, first responders, local authorities, institutions, which would participate in an emergency response (as identified in 13.2). c. The Operator has secured and maintains resources in a state of readiness to respond to tailings facility credible flow failure scenarios if such apply to their facility. d. Annual internal and community-focused training and exercises on the EPRP are conducted. e. The Operator has a program to conduct emergency response simulations with emergency service	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	

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but at least every 3 years for tailings facilities with potential loss of life.	providers, and project-affected peoples at a frequency defined in the EPRP. f. For facilities with credible flow failure scenarios, the Operator conducted emergency response simulations are undertaken at least every 3 years for those tailings facility credible flow failure scenarios, which may result in loss of life. Simulations can range from tabletop exercises to field exercises of an emergency and can include testing of multiple credible flow failure scenarios.			
REQUIREMENT 13.4: In the case of a catastrophic tailings facility failure, provide immediate response to save lives, supply humanitarian aid and minimise environmental harm.	The following are demonstrated: a. The EPRP includes specific actions to immediately respond if a catastrophic tailings facility failure has occurred (refer to Requirements in 13.1). b. Immediate response in the wake of a catastrophic tailings facility failure clearly prioritizes the saving of lives, provision of humanitarian aid and minimization of environmental harm.	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	
PRINCIPLE 14: Prepare for long term recovery in the event of catastrophic failure				
REQUIREMENT 14.1: Based on tailings facility credible flow failure scenarios and the assessment of potential consequences, take reasonable steps to meaningfully engage with public sector agencies and other organisations that would participate in medium- and long-term social and environmental post-failure response strategies.	For facilities that have credible flow failure scenarios, based on those scenarios and assessment of potential consequences (see Protocols 2.3 and/or 2.4), the following are demonstrated: a. Operator has identified public sector agencies and other organizations that would participate in medium and long-term social and environmental post-failure response strategies. b. Operator has taken reasonable steps to meaningfully engage with such organizations.	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	
REQUIREMENT 14.2: In the event of a catastrophic tailings facility failure, assess social, environmental and local economic impacts as soon as possible after people are safe and short-term survival needs have been met.	The following are demonstrated in the event of a catastrophic tailings facility failure: a. The Operator has undertaken a post-incident impact assessment that addresses social, environmental and local economic impacts. b. The post-incident impact assessment has been undertaken as soon as possible after people are safe and short-term survival needs have been met.	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	
REQUIREMENT 14.3: In the event of a catastrophic tailings facility failure, work with public sector agencies and other stakeholders to develop and implement reconstruction, restoration and recovery plans that address the medium- and long-term social, environmental and local economic impacts of the failure. The plans shall be disclosed if permitted by public authorities.	The following are demonstrated in the event of a catastrophic tailings facility failure: a. The Operator has developed plans, in conjunction with public sector agencies and other stakeholders, to address the medium- and long-term social, environmental and local economic impacts of the failure. b. The Operator has provided for disclosure of the reconstruction, restoration, reclamation and recovery plans, if permitted by public authorities. c. The Operator has implemented the plans in collaboration with public sector agencies and other stakeholders.	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	
REQUIREMENT 14.4: In the event of a catastrophic tailings facility failure, enable the participation of affected people in reconstruction, restoration and recovery works and ongoing monitoring activities.	The following are demonstrated in the event of a a catastrophic tailings facility failure: a. The Operator has enabled the participation of affected people in reconstruction, restoration and recovery works and ongoing monitoring activities.	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	
REQUIREMENT 14.5: Facilitate the monitoring and public reporting of post-failure outcomes that are aligned with the thresholds and indicators outlined in the reconstruction, restoration and recovery plans and adapt activities in response to findings and feedback.	In the event of a catastrophic tailings facility failure, the following are demonstrated: a. The Operator facilitates monitoring and public reporting of post-failure outcomes. b. Monitoring and public reporting of post-failure outcomes are aligned with the thresholds and indicators outlined in the reconstruction, restoration and recovery plans. c. Monitoring and public reporting of post-failure outcomes activities are adapted in response to findings and feedback.	**N/A**	- No credible flow failure scenarios. - No communities in the immediate d/s area of the facilities.	

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TOPIC VI: PUBLIC DISCLOSURE AND ACCESS TO INFORMATION				
PRINCIPLE 15: Publicly disclose and provide access to information about the tailings facility to support public accountability.				
REQUIREMENT 15.1: Publish and regularly update information on the Operator's commitment to safe tailings facility management, implementation of its tailings governance framework, its organisation-wide policies, standards or approaches to the design, construction, monitoring and closure of tailings facilities. A. For new tailings facilities for which the regulatory authorisation process has commenced, or that are otherwise approved by the Operator, the Operator shall publish and update, in accordance with Principle 21 of the UNGP, the following information: 1. A plain language summary of the rationale for the basis of the design and site selected as per the multi-criteria alternatives analysis, impact assessments, and mitigation plans (Information may be obtained from the output of multiple Requirements including, but not limited to, Requirements 3.2, 3.3, 5.1, 5.3, 6.4, 6.6, 7.1 and 10.1); and 2. The Consequence Classification. (Requirement 4.1). B. For each existing tailings facility and in accordance with Principle 21 of the UNGP, the Operator shall publish and update at least on an annual basis, the following information: 1. A description of the tailings facility (information may be obtained from the output of Requirements 5.5 and 6.4); 2. The Consequence Classification (Requirement 4.1); 3. A summary of risk assessment findings relevant to the tailings facility (Information may be obtained from the output of Requirement 10.1); 4. A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow failure scenarios (Information may be obtained from the output of Requirements 2.4 and 3.3);	All of the disclosures specified in 15.1(A) are addressed. All of the disclosures specified in 15.1(B) are addressed. The disclosures specified in 15.1(C) are addressed.	**M**	- Draft disclosure report provided. - To be released in August 2025 - Document provided	

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5. A description of the design for all phases of the tailings facility lifecycle including the current and final height (Information may be obtained from the output of Requirement 5.5); 6. A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP (Information may be obtained from output of Requirements 10.4 and 10.5); 7. A summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures (Requirement 7.5); 8. A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow failure event that: (i) is informed by credible flow failure scenarios from the tailings facility breach analysis; (ii) includes emergency response measures that apply to project affected people as identified through the tailings facility breach analysis and involve cooperation with public sector agencies; and (iii) excludes details of emergency preparedness measures that apply to the Operator's assets, or confidential information (Requirements 13.1 and 13.2); 9. Dates of most recent and next independent reviews (Requirement 10.5); and 10. Annual confirmation that the Operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs of planned closure, early closure, reclamation, and post-closure of the tailings facility and its appurtenant structures (Requirement 10.7). Such disclosures shall be made directly, unless subject to limitations imposed by regulatory authorities. C. Provide local authorities and emergency services with sufficient information derived from the breach analysis to enable effective disaster management planning (Information may be obtained from the output of Requirement 2.3)				

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REQUIREMENT 15.2: Respond in a systematic and timely manner to requests from interested and affected stakeholders for additional information material to the public safety and integrity of a tailings facility. When the request for information is denied, provide an explanation to the requesting stakeholder.	The following are demonstrated: a. The Operator maintains a systematic and timely approach to responding to requests from project-affected people for information material1 to public safety and integrity of a tailings facility. b. In instances where such requests are denied by the Operator, an explanation shall be provided to the requesting project-affected people in a reasonable timeframe and records shall be kept of relevant explanations provided to the requesting project-affected people.	**M**	- See comments in 1.4. - No requests have been made nor denied by the Bruce site team in terms of information requests	
REQUIREMENT 15.3: Commit to cooperate in credible global transparency initiatives to create standardised, independent, industry-wide and publicly accessible databases, inventories or other information repositories about the safety and integrity of tailings facilities.	The following are demonstrated: a. Contribute information to credible global transparency initiatives relating to safety and integrity of tailings facilities. b. Update disclosed information relating to safety and integrity of tailings facilities periodically, as a minimum in line with requirements in 15.1.	**M**	- Contributions to global transparency and research initiatives relating to safety and integrity of tailings facilities submitted.	