

# OUR NATURAL CAPITAL



Generating a net positive impact goes beyond the rigorous management systems, processes and controls, and the day to day efforts we make across the organization to minimize any negative environmental impacts from DPM operations. Our more ambitious goal is to create a positive environmental legacy, embodying our core value of being stewards of the environment, and making ecosystem services more robust and resilient for our host communities.

## COMMITMENTS AND PARTNERSHIPS

Our policies, standards and reporting practices are guided by a number of external frameworks related to environmental stewardship and sustainable development:

- UN Sustainable Development Goals
- European Bank for Reconstruction and Development (EBRD) performance standards
- International Finance Corporation (IFC) Environmental and Social Performance Standards
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Global Reporting Initiative

Several industry specific frameworks inform our approach to managing natural capital, such as:

- Initiative for Responsible Mining Assurance Standards
- World Gold Council's Responsible Gold Mining Principles
- The Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)
- London Bullion Market Association
- Extractive Industries Transparency Initiative (EITI)
- Extractive Sector Transparency Measures Act (ESTMA)

At DPM, we have integrated key principles of sustainability closely into our business model, making these an integral part of how we think, act, and operate.

The company's financial and non-financial capital resources are allocated in ways that ensure good governance, sustainability, and innovation. Our existing portfolio of assets and growth opportunities are optimized to deliver value to all of DPM's stakeholders.

The company's purpose is to "unlock resources and generate value to thrive and grow together". This purpose is supported by a foundation of six core values that inform a set of interdependent and complementary strategic pillars and strategic objectives, one of which is to "generate a net positive impact from our operations." ("[Our Business Model](#)"). In order to provide a more robust framework for assessing our net positive impact going forward, we have adopted the concept of the "Six Capitals".<sup>1</sup> Informed by the Six Capitals approach, we developed our Corporate Responsibility Policy, which integrates health and safety with environmental aspects and social licence including stakeholder engagement. In order to be able to fulfill the commitments defined in our Corporate Responsibility Policy, we identified seven priority areas, five of which are related to managing environmental areas that guide our strategy and actions. We supplement our corporate policies with site-specific procedures that ensure we remain in compliance with all applicable laws, rules and regulations, as well as international standards, as evidenced by our numerous investments in initiatives to optimize and improve our environmental performance.

To review our annual performance for each of our material environmental issues, please refer to the data tables and accompanying information in our [Sustainability Report](#)

**We manage environmental matters consistently and in a way that supports the fulfilment of DPM's long-term purpose and our strategic objective, to generate a net positive impact from our operations.**

1. For an introduction into the concept of value creation through Six Capitals, see e.g. the guidelines of the International Integrated Reporting Council (IIRC): <https://integratedreporting.org>

# CLIMATE CHANGE AND ENERGY

## BACKGROUND

The scientific consensus is clear - climate change is the imperative challenge of our time. In 2015, global governments adopted the Paris Agreement with the goal of limiting global warming to well below 2°C, in order to stave off the most severe impacts of climate change. Achieving this goal implies wide-ranging societal transformation. DPM is committed to supporting this effort, both by working to reduce our own climate impacts and as a producer of blister copper, a commodity essential to a decarbonized economy. It has been declared that we are now in the last decisive decade for governments, companies and civil society to commit to climate action in order to avoid the worst of the climate crisis. Our company's purpose of unlocking resources and generating value to thrive and grow together embodies DPM's fundamental commitment to sustainability and speaks to the deep collaboration required to ensure the resiliency of our global environmental and social systems in the midst of the climate crisis.

## GOVERNANCE AND ACCOUNTABILITY

DPM's Sustainability Committee of the Board of Directors, (Board) provides ongoing oversight of the company's overall sustainable development activities to ensure the management of the organization's environmental and social impacts. This includes receiving quarterly updates on the company's climate strategy including risks and opportunities and progress against our greenhouse gas reduction targets.

At the Executive level, the Senior Vice President (SVP), Sustainable Business Development reports directly to the President and Chief Executive Officer and is responsible for health and safety and sustainability including both social and environmental impacts, including our climate strategy. The Director of Sustainability reports directly to the SVP, Sustainable Business Development and leads DPM's overall climate strategy, working across the Executive team and Sustainability Directors at each operational site to integrate our climate targets throughout the company's operational and functional areas.

## Our Balanced Score Card

An important element of DPM's internal management system is performance monitoring and measurement through the Balanced Score Card (BSC) methodology, incorporating environmental and social performance into the overall employee and executive compensation structure. Once a year the Board approves the BSC reflecting the annual corporate goals which in turn support the achievement of our strategic objectives. The ESG component of the BSC has consistently included climate-related performance over the last several years. With the announcement of our carbon reduction targets in 2022, performance against an annual GHG reduction target will now be incorporated into the BSC going forward until our organizational climate goals are achieved. The BSC climate metrics are monitored monthly by the Senior Management Team and reported quarterly to the Sustainability Committee and the Board.

## Our Policies and Standards

### Policies

DPM's Board has endorsed the inclusion of climate-related matters as part of the company's Corporate Responsibility Policy, accounting for both climate change mitigation and adaptation. Responsible management of emissions and the reduction of DPM's environmental footprint throughout the business life cycle, considering the impact of climate change on the organization, and building climate resilience into the company are key elements in the policy.

### Standards

An Integrated Management System (IMS) is in place and effective at all of our operational sites. While not fully assured by a third party to ISO standards, the management system was designed and modelled after the requirements of ISO 14001 for an environmental management system. The standard ensures that our efforts are systematically organized towards fulfilling compliance obligations and enhancing our performance.

## OUR APPROACH TO CLIMATE CHANGE AND ENERGY

### Climate Change Adaptation

The mining industry faces many environmental challenges, some of which directly stem from climate change, including water and energy availability. DPM has committed to building resiliency into the

company by taking into account the impact of climate change on the business. Our sustainability reporting framework includes a publication on the [“Risks and opportunities relating to climate change”](#), as defined by TCFD. The analysis allows us to evaluate physical and transition climate change risks which are then incorporated into our internal risk management processes. In addition, DPM has developed a comprehensive Enterprise Risk Management (ERM) system to manage risk, including climate-related risk, throughout the organization.

DPM’s efforts towards climate change mitigation, as discussed in the following section, also contributes to our adaptation since decreasing our energy use reduces future carbon pricing risks. Additionally, our ambitious decarbonization approach assists us in capitalizing on the opportunities provided by the transition to a low carbon economy, such as improved energy efficiency, smaller operating costs, and a growing demand for copper in the low-carbon world.

### Climate Change Targets & Energy Management

DPM’s corporate-wide climate strategy is based on our growth strategy, capital resources and operational priorities, and is informed by the latest Intergovernmental Panel on Climate Change (IPCC) climate science. Energy reductions and efficiency have been a key focus for the company since its onset as our advancement has largely been the result of acquiring under-performing and under-capitalized assets and transforming them into world-class operations that meet stringent international environmental and sustainability performance standards. Our ambitions are in line with the goal of keeping the world below the two-degree threshold, as defined by the Paris Agreement Framework. In our publication: [“Generate Net Positive Impact; 2022 Climate Change Targets”](#), our Board endorsed a commitment to reduce our absolute Scope 1 and 2 GHG emissions by 37.5% by 2035 and to achieve Net Zero emissions by 2050. We aim to develop a Scope 3 emissions target by 2025 and engage with existing and potential new partners within our value chain to identify and pursue opportunities that will have a meaningful impact.

Being part of an energy intensive industry, we are consistently and continuously exploring possibilities to reduce our energy consumption, both through gradual operational improvements and through the implementation of ground-breaking new technologies. We recognize that achieving our emission reduction objectives will require the involvement of our organization at all levels, particularly at the func-

tional and operational level. Therefore, our work focuses on creating detailed site-level decarbonization maps for each of our assets. Every four years, we commission an energy efficiency audit and we implement recommended measures at our operating sites. Apart from energy use optimization, our planned initiatives include electrification of mobile equipment, increased use of renewable fuels and, where feasible, expansion of the renewable content of the electricity we consume. Our education and training programs and the experience obtained from our decarbonization projects lay the foundation of knowledge needed to optimize our future assets in order to meet our goal of being Net Zero by 2050.

### Measurement and Reporting

We follow the [Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard](#) to quantify and measure our Scope 1, 2 and 3 GHG emissions for each of our operations. These values are subject to third party assurance and reported annually in our Sustainability Reports and Sustainability Data Supplements.

# WASTE MANAGEMENT BACKGROUND

Waste management is a critical issue in mining and metallurgy as both industries unavoidably generate significant quantities of waste in several forms. Our management strictly monitors waste regardless of its type (e.g., hazardous/non-hazardous, mineral/non-mineral). All our operational sites have a waste management plan and provide examples of modern and innovative solutions in reduction, reuse, and safe treatment of waste.

For practical and reporting purposes, DPM segregates its waste in two major categories: mineral and non-mineral waste. Mineral waste includes mill tailings, including arsenic waste, and mined waste rock, while non-mineral waste encompasses other hazardous and non-hazardous waste such as metals, oils, plastics and construction materials. All of these waste streams are subject to very strict management control.

For information on our tailings management approach, [refer to section Tailings Management on page 8.](#)

## GOVERNANCE AND ACCOUNTABILITY

The Board through its Sustainability Committee provides ongoing oversight of the company's overall sustainable development activities to ensure the reduction of the organization's environmental and social impact. This includes receiving quarterly updates on the company's waste management initiatives, including arsenic bearing wastes and impacts.

At the Executive level, the Senior Vice President (SVP), Sustainable Business Development reports directly to the President and Chief Executive Officer and is responsible for health and safety and sustainability including both social and environmental impacts, inclusive of waste management. Directors leading the sustainability teams at each of our sites develop and lead each site's respective waste management strategy and targets, with the ultimate goal of reducing our generation of hazardous and non-hazardous waste and their impacts.

In 2019, we established an Arsenic Advisory Panel comprised of international experts on arsenic management, who advise us on matters including (but not limited to) health, safety and environmental protection and stewardship.

### Our Balanced Score Card

An important element of DPM's internal management system is its performance monitoring and measurement through the Balanced Score Card (BSC) methodology, incorporating environmental and social performance into the overall employee and executive compensation structure. Each operating site develops their own BSC which helps to direct resources to improve performance and ultimately influences compensation for their respective entity. Waste management in the form of arsenic level reduction has been consistently reflected in our Tsumeb smelter's BSC over the years to signal the importance of reducing the impact of that issue on the environment and more significantly the health of our employees and surrounding communities.

### Policies and Standards

Effective control, reduction and responsible management of all effluents and waste is a key element of our responsible business practices, as we have committed to in our Corporate Responsibility Policy.

The policy reflects our core values and is a testimony of our integrated approach to sustainable governance by encompassing several environmental and social matters, including waste.

### Arsenic Management

Corporate-wide waste policies, commitments and management systems are being developed for critical pollutants such as arsenic to ensure that best practices in arsenic processing, disposal and environmental and health management are followed.

## OUR APPROACH TO WASTE MANAGEMENT

For practical and reporting purposes, DPM segregates its waste streams into mineral and non-mineral waste. Our mineral waste is further categorized into three different streams: mill tailings, mined waste rock, and hazardous mineral waste (including arsenic waste.) Non-mineral waste includes other hazardous and non-hazardous waste such as metals, oils, plastics and construction materials. Both waste streams are subject to very strict management control. This section focuses on all waste except for mill tailings, which is addressed separately in the Tailings Management section.

### Mineral Waste

At our Chelopech mine, the bulk of mineral waste generation is in mill tailings. Around 40% is waste rock, which is reused for backfilling empty galleries, providing support to the surrounding rock mass, mitigating the risk of surface subsidence, and ensuring a safer working environment. All waste rock is returned underground together with a sulphide-resistant cement to avoid any acid rock drainage.

In contrast to Chelopech, all mining waste at our Ada Tepe mine site is non-hazardous with inert characteristics and does not negatively impact the surroundings. The waste is managed in an Integrated Mine Waste Facility (IMWF) through a detailed technical and biological rehabilitation plan employed throughout the operation cycle of the mine and beyond.

### Arsenic Management

The processing of complex concentrates at our smelter in Tsumeb, results in hazardous arsenic-bearing

ing dust that must be disposed of responsibly. Since acquiring the smelter in 2010, we have mitigated the risks of disposal by building a hazardous waste landfill facility as an engineered solution meeting the requirements for long term storage of such types of materials.

Our Arsenic Exposure Reduction Plan drives continuous improvement and is designed to ensure that the management, monitoring, stewardship, storage and neutralization of arsenic by-products complies with both international and national standards. It focuses on engineering controls to reduce exposure in the workplace through limiting emission generation at the source and removing emissions from the workplace before they reach employees. The plan stretches over several years and is supported by numerous initiatives such as training, plant-specific housekeeping and a range of other improvements. Inputs into the plan and actions are sought internally, as well as from external experts, and the impact of actions is monitored and verified through occupational hygiene and biological monitoring.

We are actively developing solutions to limit arsenic exposure in the workplace and mitigate occupational health and safety risks. Regular third party verified environmental monitoring is conducted to control the extent of community exposure to arsenic and preserve the environment.

### Non-Mineral Waste

We separate non-mineral waste into hazardous and non-hazardous, with both types of waste being further split into three categories: waste recycled off-site, waste treated and disposed of on-site, and waste sent off-site but not recycled.

We have implemented separate collection systems for non-hazardous waste, including plastic from bags and water bottles, metal packaging, paper from office buildings, tires from mining vehicles and cars, protective clothing, and others. Hazardous waste streams are segregated and include printer cartridges, used oil, batteries, or any other polluted non-hazardous waste. The majority of this waste is recycled off-site.

All waste from our mining operations is treated locally and our contracts for off-site waste disposal or recovery have specific requirements for the conditions and location of the waste treatment plants.

# WATER MANAGEMENT

## BACKGROUND

Both mining and metallurgy use significant amounts of water. Most of it is needed for flotation and other technological processes, but significant quantities are used for cooling of machinery, sprinkling systems, as well as sanitary water supply. Ore bodies and their processing often release metals and acidity to the environment, so handling of wastewater is a critical issue for us.

In water-scarce regions, our industry may be a significant water consumer, thus leading to potential competition for demand with other users.

## GOVERNANCE AND ACCOUNTABILITY

The Board through its Sustainability Committee provides ongoing oversight of the company's overall sustainable development activities to ensure the reduction of the organization's environmental and social impact. Management of water and effluents is an important component of the Committee's agenda.

At the Executive level, the Senior Vice President (SVP), Sustainable Business Development reports directly to the President and Chief Executive Officer and is responsible for health and safety and sustainability including both social and environmental impacts. Working with each operational site, this role oversees the company's water plans and initiatives and benchmarks them against industry standards and international best practices. The various directors across each of our sustainability teams are responsible for developing and monitoring each site's respective water-related activities in order to continuously improve water stewardship.

Water-related risks are monitored as part of our Enterprise Risk Management system and key risks and mitigation strategies are reported to the Sustainability Committee. Once identified, water risks and opportunities are used to inform decision-making throughout the lifecycle of our assets from exploration, development, and operation, through to closure.

We continuously work to control water risk below levels that could seriously impact our operations or adversely affect neighbouring communities or ecosystems. As water represents an important physical risk for our operations, we evaluate water risks also in the context of their relationship with climate change as part of an assessment based on the recommendations of the TCFD. We use this framework to disclose information related to our governance, strategy, risk management, metrics and targets regarding climate change and its effects on availability, distribution, and quality of water resources. Our preparedness for expected changes in climate is deemed sufficient, with risks having limited implications for current production processes or requiring minor investments.

### Our Balanced Score Card

An important element of DPM's internal management system is its performance monitoring and measurement through the Balanced Score Card (BSC) methodology, incorporating environmental and social performance into the overall employee and executive compensation structure. Each operating site develops their own BSC which helps to direct resources to improve performance and ultimately influences compensation for their respective entity.

Until recently, the reduction of freshwater consumption was a measure in our corporate-wide BSC. However, with increasingly strong performance at our mine sites, the measure is now captured exclusively on our Tsumeb smelter's BSC in order to focus the organization on driving further progress toward that site's freshwater reduction.

### Policies and Standards

Our continuous efforts towards optimization of water consumption and reuse have resulted in zero industrial wastewater discharge policy across our mining sites. We maintain the policy through a strict water quality management plan that includes proper treatment and recycling of water. DPM's Corporate Responsibility Policy includes provisions for effective control and reduction of effluents and encourages environmental protection throughout all aspects of our business.

## OUR APPROACH TO WATER MANAGEMENT

### Water use

We operate in water stressed regions where our business may be a substantial water consumer and

lead to potential competition for demand with the community. We prioritize the protection of water resources against pollution and the implementation of best practices for responsible water use. We have established high standards in our industry for water stewardship and our efforts and investments to reduce consumption have led to an impressive reduction in freshwater use intensity at all operations. We have continuously implemented an extensive surface water management program, including site-level measures related to refurbishment and construction of existing infrastructure to reduce water use intensity.

### Water discharge

We implement innovative measures of water recovery and recycling to achieve our ambitious goals of zero industrial wastewater at our mine sites. We are proud that no stakeholder conflicts concerning water resources or water-related incidents have taken place at any of our operations. As part of our holistic approach to the environment we have created a synergy between our water and mine waste objectives by minimizing water requirements and pollution through upgrading our tailings management facilities.

[Refer to Tailings Management section.](#)

### Water Quality

All water released to the environment by DPM complies with strict standards and discharging permits. A water quality monitoring plan is in place which tracks the biological quality of local water resources and ensures all legal requirements are met.

# BIODIVERSITY AND HABITAT CONSERVATION

## BACKGROUND

The development, operation, closure, and remediation of mines can have a range of impacts on biodiversity, such as landscape alterations, vegetation removal, and impacts to wildlife habitats. Leaving the surrounding environment in a state at least as good or better as it was prior to our operations is part of our strategic goal of creating a net positive impact with our business. We believe that our ability to transform natural capital into social and

human capital contributes to and strengthens the sustainable livelihoods of the community. Therefore, restoring and improving ecosystem services and supporting resilient habitats is essential to providing measurable evidence that our purpose is being met.

## GOVERNANCE AND ACCOUNTABILITY

The Board through its Sustainability Committee provides ongoing oversight of the company's overall sustainable development activities to ensure the reduction of the organization's environmental and social impact. The management of the impact on the biodiversity and habitats surrounding our operations is a material aspect of the Committee's work.

At the Executive level, the Senior Vice President (SVP), Sustainable Business Development reports directly to the President and Chief Executive Officer and is responsible for health and safety and sustainability including both social and environmental impacts including DPM's biodiversity initiatives including site biodiversity plans. The various directors across each of the company's sustainability teams are responsible for developing, executing and monitoring proactive habitat and biodiversity management plans for their respective sites.

### Our Balanced Score Card

An important element of DPM's internal management system is its performance monitoring and measurement through the Balanced Score Card (BSC) methodology that incorporates environmental and social performance into the overall employee and executive compensation structure. Each operating site develops their own BSC which helps to direct resources to improve performance and ultimately influences compensation for their respective entity.

The inclusion of performance against a mine site's biodiversity action plans is captured in the site's BSC with a focus on increasing rehabilitation, monitoring and prevention of habitat, plants and animal species deterioration.

All of our operational sites have developed comprehensive biodiversity management plans which are frequently monitored by internal quality controls to ensure progress in implementing the plan and to introduce any necessary changes or updates at the earliest possible stage. We provide extensive external reporting for specific indicators and have implemented effective oversight by corporate management and the Board.

## Policies and Standards

As part of our Corporate Responsibility Policy, we have committed to ensuring the efficient use and protection of the natural, physical and biotic environment. Our plans take into account the environmental and social policy of European Bank for Reconstruction and Development (EBRD) and the relevant Implementation Requirements, as well as the Implementing Standards and recommendations of the International Financial Corporation (IFC) aimed at protecting biodiversity, benefiting from ecosystem services and sustainable management of living natural resources. Additionally, our biodiversity management plans in Bulgaria have been developed in accordance with the Standard for Sustainable Development of the Mineral-Raw Material Industry in Bulgaria, which is consistent with the provisions of the European Union and the most up-to-date legislative requirements and best global practices.

## OUR APPROACH TO BIODIVERSITY AND HABITAT CONSERVATION

All our operational sites have biodiversity management plans in place and have been subject to extensive environmental assessment and permitting procedures at an early exploration and development stage. The plans' general long-term objectives include conservation and improvement of habitats and species while each operational site focuses on specific execution steps from an analysis and systematization of the available information regarding biodiversity through to the establishment of an effective system for monitoring and evaluating progress in the implementation of the planned activities. DPM's management addresses stakeholder concerns through grievance mechanisms and stakeholder engagement activities, with a feedback loop, enabling two-way communication. We partner with a number of NGOs to ensure adequate measures are considered and implemented.

### Rehabilitation and Soil Management

Mining activities may result in land-use changes modifying the surrounding landscape through deforestation, erosion and contamination of soil. As a metals and mining company DPM faces regulatory risks related to reclamation after a mine or a waste facility is decommissioned. Our closure and rehabilitation provisions are developed and updated by qualified third parties and are reflected in our balance sheet as Asset Retirement Obligations. Progressive rehabilita-

tion is a well-established practice across all our operations as our biodiversity management plans include land reclamation and remediation activities. Rehabilitation of degraded and polluted soil is a long-term process that we continue to develop to ensure there is a minimum impact on land from our business.

# TAILINGS MANAGEMENT

## BACKGROUND

Tailings are a common mine waste by-product requiring containment in a tailings storage facility and representing one of the industry's biggest risks. In the event these facilities become compromised or even fail in their containment, the resulting community and environmental impacts could be devastating. As such, tailings facilities require effective and continuous risk assessment, management, assurance, and communication to protect against failures and ensure their continued safe and secure operation.

## GOVERNANCE AND ACCOUNTABILITY

The Board through its Sustainability Committee provides ongoing oversight of the company's overall sustainable development activities to ensure the reduction of the organization's environmental and social impact. The Committee receives quarterly updates and frequently engages with external consultants to ensure compliance with our tailings management framework.

We have developed a Tailings Management Standard that describes the roles and responsibilities of personnel involved with tailings within the organization from the Chief Executive Officer and the Senior Vice President of sustainability (SVP) through to key site individuals.

Tailings management risks and the status of plans and actions are reported quarterly to the Sustainability Committee. The Accountable Executive Officer is responsible for providing assurance to the Board and key stakeholders that tailings facilities are managed correctly. At site level, the Vice Presidents and General Managers are accountable for tailings management by ensuring plans are developed, resourced, and implemented in accordance with all local legal and regulatory requirements.

We have additionally introduced an Independent Tailings Review Board (ITRB) to provide on-going, independent confirmation by internationally recognized experts that the design, construction, operation, and closure of our tailings management facilities (TMFs) obey all applicable regulations, conform with international best practices, and minimize impacts on the environment and the community. The ITRB is given broad authority to review and comment on all aspects of the TMFs throughout their life cycle and its recommendations are incorporated into corrective action plans prepared and implemented by each site.

## Our Balanced Score Card

An important element of DPM's internal management system is its performance monitoring and measurement through the Balanced Score Card (BSC) methodology that incorporates environmental and social performance into the overall employee and executive compensation structure. Each operating site develops their own BSC which helps to direct resources to improve performance and ultimately influences compensation for their respective entity. The management of our TMF's has historically been included in the BSC.

## Policies and Standards

### Policies

Our commitment to protect the environment and the communities surrounding our operations from tailings risk is set out in our Corporate Responsibility Policy wherein we commit to applying a rigorous holistic approach to tailings management to achieve safe long-term disposal in accordance with the Global Industry Standard on Tailings Management (GISTM.) The maintenance of TMFs embodies our integrated approach to corporate responsibility by encompassing all three pillars of the policy: Health and Safety, Environment, and Social.

### Standards

DPM's Tailings Management Standard has been in force since January 1, 2019. It sets the performance requirements related to all aspects of tailings management facilities and is compliant with all European obligations as well as the standards of the Canadian Dam Association and the Mining Association of Canada. The Standard ensures that TMFs are physically and chemically stable for the long term to protect the environment and the health and safety of our employees, communities and stakeholders. The current standard is being revised to fully comply with the GISTM.



## OUR APPROACH TO TAILINGS MANAGEMENT

Tailings facilities pose significant risks and require effective risk assessment, management, assurance and communication to ensure safe and secure operations. All TMFs designed and constructed by DPM incorporate an evaluation of the most appropriate technology to manage risks on a site-specific basis and of industry best practices to mitigate risk and achieve performance objectives in a technically and economically efficient manner. Business units develop an implementation plan and timeline for achieving full compliance with the Tailings Management Standard and perform annual internal reviews of all its aspects. The results are shared with the Sustainability Committee, long-term maintenance is provided for, as TMFs are included in the closure plans of

all operational sites which are submitted for approval in accordance with local regulatory requirements.

### Competency and Training

All personnel involved in the management of TMFs have been properly trained to ensure that the facilities have been constructed and are performing in accordance with the design intent, performance objectives, and applicable standards and regulatory requirements throughout their whole life cycle. DPM has identified specific competencies for all responsible employees and regular training is provided to ensure only highly skilled personnel are involved in every aspect of TMF operation and maintenance. Design and construction of the facilities are performed by qualified professional engineers licenced under the local jurisdiction.

