

# International Council on Mining and Metals' (ICMM) Performance Expectations (PEs)

## Self-Assessment

### « FY2025 Asset Level Report (Taganito HPAL Nickel Corporation: THPAL) »

We implemented a PEs self-assessment for THPAL in FY2025 as shown below and underwent third-party validation in FY2026

#### FY2025 Self-Assessment Result (THPAL) April 2025 to March 2026

| Items | Performance Expectation                                                                                                         | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1     | Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development. |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1.1   | Establish systems to maintain compliance with applicable law.                                                                   | Meets                           | As a mechanism for identifying relevant legal requirements, information on laws and regulations is shared within THPAL. In addition, the "Procedure for Identification & Evaluation of Compliance Obligations" serves as a mechanism to track, assess, demonstrate, and communicate changes to relevant legal requirements. When a compliance violation is detected at THPAL, the legal department responsible, as stipulated in the Basic Compliance Regulations, evaluates preventive measures and other necessary actions, and the details are reported to the Board of Directors of Sumitomo Metal Mining Co., Ltd. |
| 1.2   | Implement policies and practices to prevent bribery, corruption and to publicly disclose facilitation payments.                 | Partially Meets                 | THPAL has established the "Policy on Anti-Bribery" as a policy to prevent bribery and corruption. The policy stipulates that facilitation payments are to be treated in the same manner as the provision of standard benefits; however, the specific details of this treatment have not been disclosed publicly. In addition, while training on the policy and prohibited practices is provided to employees, we were unable to provide evidence that such training has been conducted for contractors.                                                                                                                 |

| Items | Performance Expectation                                                                                                                                                                                             | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                      |
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| 1.3   | Implement policies and standards consistent with the ICMM policy framework. <sup>2</sup>                                                                                                                            | —                               | —                                                                                                                                                                                                                                                                                                                                     |
| 1.4   | Assign accountability for sustainability performance at the Board and/or Executive Committee level. <sup>2</sup>                                                                                                    | —                               | —                                                                                                                                                                                                                                                                                                                                     |
| 1.5   | Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary. <sup>2</sup>                                                                     | —                               | —                                                                                                                                                                                                                                                                                                                                     |
| 2     | Integrate sustainable development in corporate strategy and decision-making processes.                                                                                                                              |                                 |                                                                                                                                                                                                                                                                                                                                       |
| 2.1   | Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities. <sup>2</sup>                     | —                               | —                                                                                                                                                                                                                                                                                                                                     |
| 2.2   | Support the adoption of responsible physical and psychological health and safety, environmental, human rights and labor policies and practices by joint venture partners, suppliers and contractors, based on risk. | Partially Meets                 | THPAL regularly communicates with contractors regarding health and safety, the environment, and related matters; however, no THPAL policy had been established to define the company's expectations across the value chain regarding occupational health and safety, the environment, human rights, and labor policies and practices. |
| 3     | Respect human rights and the interests, cultures, customs, and values of workers and communities, and other vulnerable groups – such as human rights defenders – who may be affected by our activities              |                                 |                                                                                                                                                                                                                                                                                                                                       |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 3.1   | Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence (including undertaking processes that assess perceived, potential and actual human rights impacts on rightsholders, including human rights defenders and other vulnerable groups), and providing for, or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to. | Meets                           | As a commitment to policies that avoid causing or contributing to adverse impacts on human rights through business activities, or through activities directly related to the business, products, or services, THPAL has established a Human Rights Policy. Human rights training is provided for all employees, and a Social Impact Assessment is conducted for local residents and others who may be adversely affected by corporate activities. This process involves prior investigation and evaluation of the impacts that development projects, policies, and initiatives may have on the human rights and other rights of local communities and individuals. |
| 3.2   | Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people.                                                                                                                                                                                                    | Meets                           | In developing THPAL, we explained the project to 41 households living in the affected area and requested their cooperation after obtaining their consent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.3   | Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights. This includes identifying potential and actual human rights impacts on vulnerable groups.                                                                                                                                                                                                                                                                          | Meets                           | For security guards, the Service Agreement clearly stipulates the lawful and proper management of firearms and other such items. In addition, based on an approach to security and human rights in line with the Voluntary Principles on Security and Human Rights (including human rights risk assessments), the Company provides regular training on how to appropriately and respectfully engage with stakeholders who may be affected, such as neighboring residents, while giving due consideration to human rights.                                                                                                                                          |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                                                                                     | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| 3.4   | Respect the rights of workers by: not employing child or forced labor; avoiding human trafficking; not assigning hazardous/ dangerous work to those under 18; eliminating all forms of harassment and discrimination; respecting freedom of association and collective bargaining; and providing an appropriate mechanism to address workers grievances.                    | Meets                           | Since the recruitment process employs individuals aged 18 or older, child labor and the assignment of hazardous work to persons under 18 are not anticipated. There is a "Collective Bargaining Agreement" based on workers' consent as evidence that forced labor and human trafficking are not taking place. A "Human Rights Policy" exists as a mechanism to identify, assess, and eliminate potential employment and human rights risks related to harassment and discrimination. A "Collective Bargaining Agreement" exists as a mechanism to respect the rights to freedom of association and collective bargaining. A "Speak Up System" exists as a mechanism enabling worker grievances to be raised and addressed. |
| 3.5   | Equitably remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits.                                                                                                                                | Meets                           | THPAL has employment contracts related to employee compensation, including the "Probationary Appointment Paper" and "Job Description" at the time of hiring. We monitor working hours and check compliance with statutory working hour limits. As evidence of mechanisms to ensure fair remuneration, we have internal regulations such as the "Policy on Annual Performance Appraisal".                                                                                                                                                                                                                                                                                                                                    |
| 3.6   | Respect the rights, interests, aspirations, culture, Indigenous knowledge and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; carry out due diligence to address potential adverse impacts; and share benefits in a manner that is aligned with Indigenous Peoples' aspirations for social and economic development. | Meets                           | THPAL has explained to the indigenous peoples living around THPAL the impacts of development during operations on the surrounding area and obtained their consent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Assessment<br>Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                         |
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| 3.7   | Obtain agreement with affected Indigenous Peoples demonstrating their consent to anticipated impacts to their land or other rights, and setting out the terms by which impacts may occur and be managed. Where potential impacts include the relocation of Indigenous Peoples from their lands or territories, or significant impacts to their critical cultural heritage, companies will explore feasible alternatives to project design in order to avoid such impacts. If relocation and/or significant impacts on critical cultural heritage are unavoidable, companies will obtain agreement demonstrating the consent of affected Indigenous Peoples in accordance with ICMM's Indigenous Peoples and Mining Position Statement. In any instance where agreement is not obtained, ICMM members will develop a policy or approach outlining the steps they have taken to fulfil the commitments set out in the position statement. | Meets                              | THPAL has explained to the indigenous peoples living around THPAL the compensation, assistance, and other measures to be provided in the event of any impact and obtained their consent. |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                                 | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 3.8   | Implement policies and practices to respect the rights and interests of women that reflect gender-informed approaches to work practices and job design, and that protect against all forms of discrimination and harassment, and behaviours that adversely impact on women's successful participation in the workplace. | Meets                           | THPAL strives to create a workplace that is comfortable to work in by reflecting gender-responsive approaches, including Women's Month, Magna Carta leave under the Magna Carta of Women (Republic Act), which provides leave for gynecological disorders, and parental leave. In addition, it implements fair administration of its wage structure and promotion system regardless of gender and carries out human resources management free from gender discrimination. Regarding the Company's employment and compensation practices, including THPAL, gender-disaggregated data on the ratio of female managers and employees is disclosed in the ESG Data Book. |
| 3.9   | Implement policies and practices to respect the rights and interests of all workers and improve workforce representation in the workplace so it is more inclusive.                                                                                                                                                      | Partially Meets                 | To create a more inclusive workplace, our group conducts initiatives such as Men's Month, Mental Health Forum, and harassment training, not only for women but for people of all backgrounds, to foster a workplace where everyone can work comfortably. However, we were unable to provide evidence of detailed activities extending to contractors.                                                                                                                                                                                                                                                                                                                |
| 4     | Implement effective risk-management strategies and systems based on sound science, and which account for stakeholder perceptions of risk.                                                                                                                                                                               |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4.1   | Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.                                                                                          | Meets                           | We obtained the "Environmental Compliance Certificate" prior to the development of THPAL and submitted it to the relevant authorities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                 | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 4.2   | Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High Risk Areas, when operating in, or sourcing from, a conflict-affected or high risk area.                                                                  | Not Applicable                  | THPAL was determined to be “not applicable” because no operations or procurement in CAHRAs were identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4.3   | Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy physical and psychological health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system. | Meets                           | Although THPAL has not obtained third-party certification, it has established an occupational health and safety management system by building a safety and health management framework, setting policies, objectives, and plans, and operating a PDCA cycle, and it implements an environmental management system based on ISO 14001. As evidence of risk-based controls to avoid/prevent, minimise, mitigate and/or remedy physical and psychological health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, as well as to minimise or compensate for adverse impacts, regulations such as the “Risk Management System Regulations” and the “Environmental Policy” are in place. |
| 4.4   | Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice.                                                               | Partially Meets                 | THPAL identifies foreseeable hazards and risks that could lead to emergencies and has developed earthquake preparedness measures based on a revised damage scenario, as well as measures and response plans for cybersecurity risks. While individual measures are being implemented, we were unable to provide evidence of the full process of establishing, maintaining, and testing the emergency response plan.                                                                                                                                                                                                                                                                                                                               |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                                              | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 5     | Pursue continual improvement in physical and psychological health and safety performance with the ultimate goal of zero harm.                                                                                                                                                                                                        |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 5.1   | Implement practices aimed at continually improving workplace physical and psychological health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries, psychosocial hazards and prevention of occupational diseases, based upon a recognised international standard or management system. | Partially Meets                 | Although third-party certification has not been obtained, THPAL has established its own occupational health and safety management system, and documents such as the "Safety and Health Handbook" exist as mechanisms for identifying, assessing, eliminating (where possible), and/or controlling health and safety hazards and occupational diseases. Because third-party certification has not been obtained, we were unable to provide evidence of a recognized international standard or management system.                  |
| 5.2   | Provide workers with training in accordance with their responsibilities for physical and psychological health and safety and implement health surveillance and risk-based monitoring programmes based on occupational exposures.                                                                                                     | Meets                           | THPAL has internal regulations, such as the "Safety and Health Handbook," as mechanisms to identify and provide job-specific health and safety training for employees, and to conduct education on security, safety, and occupational health management. Additionally, our internal regulations, such as the "Safety and Health Handbook," specify the activities, substances, and processes to which employees may be exposed, along with the procedures to follow in the event that occupational exposure limits are exceeded. |
| 5.3   | Safeguard the health of workers against exposure to diesel particulate matter (DPM) emissions in all underground mining operations by implementing a comprehensive DPM management programme.                                                                                                                                         | Not Applicable                  | THPAL was determined to be "not applicable" because it is not an underground mine.                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 6     | Pursue continual improvement in environmental performance issues, such as water stewardship, energy use, and climate change.                                                                                                                                                                                                         |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Items | Performance Expectation                                                                                                                                                                                                                                                    | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 6.1   | Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised. | Not Applicable                  | THPAL was determined to be “not applicable” because it is not a mine.                                                                                                                                                                                                                                                                                                                                                                             |
| 6.2   | Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.      | Meets                           | As a policy for implementing water resource management, the “Policy on the Adoption of SMM Group’s Water Policy” is in place, and the “Water Quality Management Procedure” is in place as the implementation procedure. Water withdrawal, wastewater discharge, and pollutants are monitored. In addition, the company engages in regular consultations with local residents regarding the provision of water supply systems and related matters. |
| 6.3   | Design, construct, operate, monitor and decommission tailings disposal/storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure.         | Meets                           | THPAL complies with and discloses information in accordance with the Global Industry Standard on Tailings Management (GISTM).                                                                                                                                                                                                                                                                                                                     |

| Items | Performance Expectation                                                                                                                                                                                                                                             | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 6.4   | Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment.                                                                                                                  | Meets                           | THPAL implements an environmental management system based on ISO 14001. As mechanisms to identify, assess, and control sources of potential pollution and their impacts on human health and the environment, we have established internal regulations such as the "Environmental Policy," the "Solid Waste Management Procedure," and the "Waste Management Regulations." Specific initiatives in line with the mitigation hierarchy include the reuse of water recovered within processes and the reduction of waste by utilizing unnecessary resources from one process in another.             |
| 6.5   | Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO <sub>2</sub> equivalent (GHG) emissions.                                              | Partially Meets                 | THPAL is striving to improve energy efficiency, including by conducting co-firing tests of woody biomass in coal-fired power generation (self-generation), but this has not led to a significant reduction in GHG emissions. Energy usage is reported to Sumitomo Metal Mining Co., Ltd. in accordance with the "Energy Management Regulations." Sumitomo Metal Mining Co., Ltd. calculates the Group's GHG emissions using emission factors based on the Act on Promotion of Global Warming Countermeasures, with reference to the GHG Protocol, and discloses the results in its ESG Data Book. |
| 7     | Contribute to the conservation of biodiversity and integrated approaches to land-use planning.                                                                                                                                                                      |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 7.1   | Neither explore nor develop new mines in UNESCO World Heritage Sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated. | Not Applicable                  | We determined that this was "Not applicable," as there are no UNESCO-listed World Heritage sites in the area surrounding THPAL.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Items | Performance Expectation                                                                                                                                                                                                        | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 7.2   | Assess and address material risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, to achieve a minimum of no net loss (NNL) or net gain of biodiversity by completion of closure. | Meets                           | THPAL regularly conducts surveys of aquatic life in the local area and terrestrial flora and fauna to better understand ecosystems, and, in line with the Philippines' National Greening Program, is promoting initiatives for biodiversity conservation and restoration, including reforestation, as described in the Mining Forest Program Accomplishment of THPAL.                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8     | Facilitate and support the knowledge-base and systems for responsible design, use, re-use, recycling, and disposal of products containing metals and minerals.                                                                 |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8.1   | In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources and materials.                                                         | Meets                           | There is evidence that the principles of sustainable development are integrated into the project design. As part of energy efficiency initiatives, we are working to improve energy efficiency and reduce GHG emissions through energy-saving activities, including co-firing tests of woody biomass in coal-fired power generation (self-generation) in line with the roadmap toward achieving carbon neutrality by 2050. In addition, for water recycling, we reuse supernatant water accumulated in the tailings dam in the refining process. As waste countermeasures, we are working to reduce plastic emissions, and as a resource recovery initiative, we produce recycled products such as chairs from waste plastics through a plastic waste recycling facility. |

| Items | Performance Expectation                                                                                                                                                                                                                                                       | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 8.2   | Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate.                             | Meets                           | Documents such as the “Globally Harmonized System of Classification & Labelling of Chemicals” are in place as evidence that practices are being implemented to identify, assess, and classify product hazards in accordance with the United Nations’ Globally Harmonized System of Classification and Labelling of Chemicals or an equivalent relevant regulatory mechanism. Product hazards are communicated to stakeholders through safety data sheets for hazardous substances and through containers and packaging that clearly indicate information on hazardous substances. |
| 9     | Pursue continual improvement in social performance and contribute to the social, economic, and institutional development of host countries and communities.                                                                                                                   |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9.1   | Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate. | Meets                           | THPAL implements the Social Development and Management Program (SDMP) every year and practices participatory engagement by consulting with local residents to identify, assess, and implement community development activities. As evidence, documents such as the “2026 ASDMP PLAN” and the “Local Community and Indigenous People Subcommittee” are in place.                                                                                                                                                                                                                   |
| 9.2   | Enable access by local enterprises to procurement and contracting opportunities across the project life-cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities. | Meets                           | At THPAL, the contractors are local companies, and minutes of communications with partner companies serve as evidence of consultations with the local community to define, identify, communicate, and promote procurement opportunities for local enterprises or contractors.                                                                                                                                                                                                                                                                                                     |

| Items | Performance Expectation                                                                                                                                                                                                                                                                                           | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps                                                                                                                                                                                                                                                                                                                                                                                            |
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| 9.3   | Conduct stakeholder engagement based upon an analysis of the local context, including with human rights defenders and other vulnerable groups, and provide local stakeholders with access to appropriate and effective mechanisms for seeking resolution of grievances related to the company and its activities. | Meets                           | THPAL has established a grievance mechanism in line with the UN Guiding Principles on Business and Human Rights, enabling the receipt, investigation, and internal reporting of complaints from stakeholders. ComRel, the organization responsible for planning and implementing community contribution activities, regularly communicates with local residents and indigenous peoples to identify complaints and requests. |
| 9.4   | Collaborate with government, where appropriate, to support improvements in environmental and social practices of local artisanal and small-scale mining (ASM).                                                                                                                                                    | Not Applicable                  | We determined that this was "Not applicable," as artisanal and small-scale mining (ASM) is not present in the local area.                                                                                                                                                                                                                                                                                                   |
| 10    | Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner, effectively report and independently verify progress and performance.                                                                                                              |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10.1  | Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner. <sup>2</sup>                                                                                                                                                              | —                               | —                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10.2  | Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project.                                                                                             | Not Applicable                  | We determined that this was "Not applicable," as we are not engaged in resource development in any country where the EITI is implemented.                                                                                                                                                                                                                                                                                   |
| 10.3  | Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards. <sup>2</sup>                                                                                                                                                           | —                               | —                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Items | Performance Expectation                                                                                                                                            | Assessment Summary <sup>1</sup> | Implementation Evidence and Gaps |
|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------|
| 10.4  | Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and verifying membership requirements. <sup>2</sup> | —                               | —                                |

Items for which we were unable to provide evidence will be subject to further consideration.

\*1: Each of the PEs was evaluated in light of the judgment criteria indicated for each PE in ICMM's Validation Guidance, as follows.

Meets: Systems and/or practices related to the PE have been implemented (all the judgment criteria in the Validation Guidance are met) and there is sufficient evidence thereof.

Partially Meets: Systems and/or practices related to the PE have been partially implemented (some judgment criteria of Validation Guidance are met). Or, verifiable evidence provided is insufficient.

Does not meet: Systems and/or practices related to the PE are not in place (all judgment criteria in the Validation Guidance are not met) or there is no evidence thereof

\*2: The asset level report is not applicable, as it is a corporate level item.