

HUMAN RIGHTS IMPACT ASSESSMENT SUMMARY REPORT

NEWMONT'S RED CHRIS OPERATION



**PREPARED BY:
SOCIAL RISK STRATEGY INC.**

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Cautionary Statement

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About the Assessor

Nick Abrahams is the director of consulting at Social Risk Strategy Inc., with extensive expertise in managing above-ground risks, particularly in the areas of security, social performance, and human rights.

He is highly experienced in implementing the UN Guiding Principles on Business and Human Rights, having worked on a diverse range of extractive assets and gained valuable insights into the interplay between non-technical, technical, and financial risks.



Previously, Nick led social sustainability efforts at SLB, where he played a pivotal role in advancing human rights and social performance strategies. As the chair of the [IPIECA Human Rights Working Group](#), he brought together experts from across the energy sector to address emerging human rights challenges and develop best practice guidelines.

His career began in the humanitarian sector, with impactful work across Africa, the former Soviet Union, and Afghanistan.

He holds a Master in Business Administration from INSEAD.

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Introduction

Newmont's [Human Rights Standard](#) requires sites to evaluate human rights impacts either through integrating human rights into existing assessments or undertaking a stand-alone Human Rights Impact Assessment (HRIA). Assessments identify and evaluate actual and potential human rights impacts from: (i) the site's own activities, and (ii) the site's business relationships (including relationships with suppliers, security forces and governments). Special attention is expected to be paid to identify and address the needs of vulnerable and/or marginalized community members who may be disproportionately affected by the sites' activities.

In 2024, an independent human rights assessor conducted an HRIA at the Red Chris mine in British Columbia (B.C.), Canada, located entirely on the ancestral and unceded territory of the Tahltan Nation. The assessment was undertaken in line with expectations of the [UN Guiding Principles on Business and Human Rights, 2011](#) (UNGPs) to provide a snapshot of salient human rights issues related to Red Chris operations, helping to improve decision-making and better prevent and mitigate human rights impacts.

Red Chris Operations

Red Chris is an open-pit mine that produces copper and gold. The mine has been in operation since 2015 and is proposing to transition from open pit to underground (block cave) mining. Red Chris is located approximately 23 km from the community of Iskut. Other communities north of the mine include Dease Lake and Telegraph Creek. Regional communities located south of Red Chris are Smithers (450 km), Terrace (368 km) and Stewart (200 km). Highway 37, which is approximately 12 km west of Red Chris connects the mine to the provincial transportation network. The mine employs a significant number of Tahltan members and associates.

Scoping

The HRIA considered six of the seven issue areas identified in Newmont's 2023 human rights saliency assessment [1], as well as new and emergent human rights issues specific to Red Chris operations. It covered individuals and groups affected by Red Chris operations, from within the mine-site and surrounding affected areas, including employees, contractors, local communities, and a focus on vulnerable/marginalized individuals and groups.

FIGURE 1: HUMAN RIGHTS ISSUE AREAS



Indigenous Peoples' Rights



Land Access and Use



Community Impacts



Environmental Impacts



Security



Labour Rights

[1] Workplace health and safety was not covered in the scope of this assessment due to the technicality of health and safety issues at a mine site and the management of this salient issue through other existing site health and safety assessments

HRIA Procedure

Undertaken in accordance with emerging guidance on HRIA best practices, the below table provides an overview of the key phases and actions taken to implement the HRIA.

FIGURE 2: HRIA ASSESSMENT STEPS

Step 1

Scoping and Planning

- Identification of the geographic area, time frame, project-affected stakeholders, and relevant human rights benchmarks for the assessment
- Review of Newmont group-level internal commitments and human rights-related policies, procedures, and management systems
- Review of the mining sector and its particular human rights issues and challenges in British Columbia

Step 2

Desk-based Research

- Media search on relevant human rights issues related to Red Chris operations and similar sites in Canada
- Review of secondary documents specific to Red Chris operations provided by Newmont
- Review of Self-Assessment Questionnaires completed by Red Chris operations gathering information about management systems in place

Step 3

On-site Research

- Management awareness session and one-on-one interviews
- Interviews with representatives of local communities
- Focus group discussions to gain employee and contractor perspectives on labour rights issues
- Preliminary identification and prioritization of key human rights risks and impacts

Step 4

Evaluation

- Analysis of collected data and interpretation of interviews
- Preparation of HRIA report
- Identification of human rights actions for key risks
- Presentation of findings and recommendations to management

Stakeholder Engagement

Engagement formed a core part of the HRIA process, with input gathered directly from a number of internal and external rightsholders. The HRIA sought to listen to and reflect the perspectives of those whose rights could be impacted by the operation. Key rightsholder groups identified for engagement are shown in the map below. Due to limited time and logistical limitations during the field visit, a sample of rightsholder groups were successfully engaged.

The majority of interviews were conducted with Red Chris employees and contractors, alongside a number of conversations with Tahltan community members. We recognise the HRIA process as one tool for engaging with rightsholders, which is supported by our ongoing mechanisms for engagement through stakeholder meetings, consultations, and complaints and grievance mechanisms to build an ongoing understanding of human rights risks and opportunities.

The engagement process encompassed a range of activities, including:

- Group discussions with mine management to gather insights on operational perspectives.
- Interviews with community members from Iskut and Dease Lake to understand local concerns and expectations.
- Focus group discussions with employees and contractors, featuring dedicated sessions for women-only and Tahltan worker-only groups to ensure diverse voices were heard.
- Interviews with key functional areas of Red Chris Mine, including Social Performance, Human Resources, Security, Environment, Health & Safety, Tailings and the Block Cave Project.

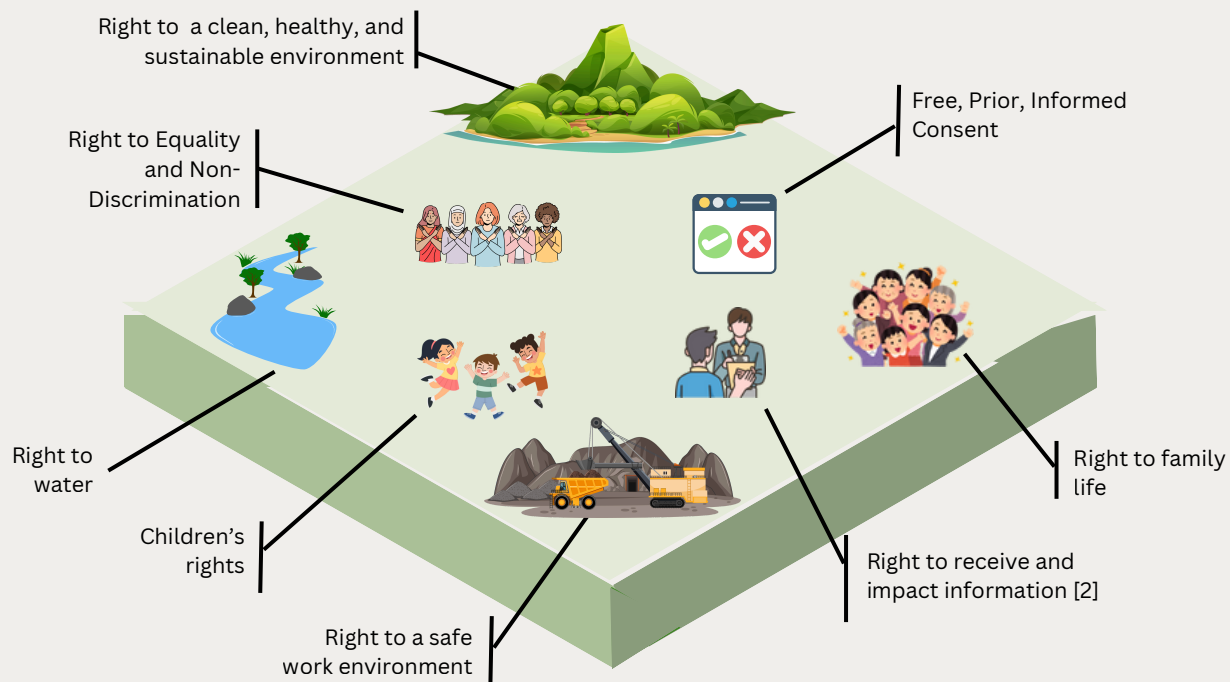
A NOTE ON POSITIVE IMPACTS

Human rights due diligence requires the identification of adverse impacts in line with the expectations of the UNGPs. Therefore, the HRIA did not focus on the mine's contributions to human rights or address the significant work of Red Chris Mine relating to socio-economic benefit sharing including production royalty payments and provincial mineral taxes, community investment, employment creation and support to local businesses, which are outside of the scope of this HRIA.

Rights Framework

The HRIA considered internationally recognized human rights, including those set out in the Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Indigenous and Tribal Peoples Convention, and United Nations Declaration on Rights of Indigenous Peoples (UNDRIP). Human rights identified where Red Chris operations may have potential adverse impacts included:

FIGURE 3: NON-EXHUASTIVE LIST OF RIGHTS AT STAKE



Findings

The assessment indicated that Red Chris mine is a low-risk operation in terms of potential human rights impacts.

This reflects the mine's location, effective engagement with the Tahltan Nation, the commitment to co-management through an Impact, Benefit and Co-Management Agreement with the Tahltan Nation (IBCA), the implementation of effective site-level management systems and relevant legislation in British Columbia, moving towards consistency with UNDRIP. Salient human rights risk scenarios identified in the HRIA are included in Figure 4 below.

[2] An element of freedom expression, Article 19 UDHR

FIGURE 4: HUMAN RIGHTS RISK SCENARIOS

Risk Scenario	Rights at Stake	Involvement	Potential / Actual	Controls in Place
Failure to fulfil commitments from the IBCA due to capacity constraints and insufficient dedicated staff within the Tahltan Central Government and Red Chris operations	<p>Free, prior and informed consent</p> <p>Right to self-determination, subsistence</p> <p>Right to cultural participation</p>	Contribute to	P	<p>Newmont's Indigenous Peoples Standard recognizes the unique rights, culture, and history of Indigenous Peoples and ensures effective implementation of Agreements signed with Indigenous Peoples</p> <p>Commitments register to proactively track all commitments in the IBCA</p> <p>Capacity Investment (including funding dedicated staff for Tahltan Central Government) that covers expenses associated with implementation of the IBCA</p> <p>Effective governance through a Project Advisory Committee and its subcommittees to enable co-management of the IBCA</p>
Disruption of family cohesion, disproportionately affecting women and children, associated with Fly-In, Fly-Out arrangements	<p>Right to family life</p> <p>Right to education</p> <p>Right to participate in cultural life</p>	Contribute to	A	<p>Newmont Sustainability and Stakeholder Engagement Policy respects the dignity, wellbeing and human rights of employees and the communities as well as those affected by Newmont activities.</p> <p>Newmont People Policy and/or Employee Assistance and Wellbeing Program proactively supports Employees and their families</p> <p>Socio Cultural Committee established through the IBCA identifies socio-cultural issues, concerns or effects and works collaboratively with Tahltan Nation to mitigate them</p> <p>Operational-level complaints and grievance mechanism brings any complaints or concerns to the forefront for immediate mitigation</p> <p>Red Chris supports communities including the affected group of people or families through strategic community investment programs</p>

FIGURE 4: HUMAN RIGHTS RISK SCENARIOS (CONT.)

Risk Scenario	Rights at Stake	Involvement	Potential / Actual	Controls in Place
Fear of polluted fish and wildlife habitat and contamination of camp water sources due to seepage from the Tailings Impound Area	<div>Right to a clean, healthy, and sustainable environment</div> <div>Right to water and sanitation</div> <div>Right to participate in cultural life</div> <div>Right to receive and impact information</div>	Caused by	P	<div>Newmont Sustainability and Stakeholder Engagement Policy commits to put in place strong governance, accessible and transparent reporting to ensure effective operational water management and efficiency</div> <div>Co-management of environmental protection practices with Tahltan Nation through Environmental Oversight Committee (EOC), Red Chris Monitoring Committee (RCMC) and other committees and subcommittees</div> <div>Effective implementation of Environmental Management Systems to ensure adherence with environmental protection legislations of both federal and provincial government of Canada</div> <div>Application of advanced technology (tailings thickener and seepage interception system) to reduce water use and comprehensive water monitoring program that covers all major waterbodies around the site</div>

Red Chris mine is committed to continuous improvement in existing management measures and implementing actions in response to the HRIA finding.