

EVR Feedback Mechanism Procedure

Purpose

This procedure outlines the approach by which Elk Valley Resources (EVR)'s Elk Valley assets, under the guidance of the Social Responsibility team, design and implement a feedback mechanism. This will ensure alignment with EVR's internal governance requirements, Glencore's Group Sustainability framework and international standards including the UN Guiding Principles on Business and Human Rights (UNGPs), the International Council on Mining and Metals (ICMM), the Mining Association for Canada (MAC), and the Global Industry Standard on Tailings Management (GISTM).

Objectives

This standard aims to:

Align with EVR and international standards

Ensure compliance with EVR's internal requirements and global best practices, including ICMM, MAC, GISTM, and the UNGPs, to uphold human rights and responsible engagement.

Identify risks early

Use community feedback to detect emerging concerns and potential risks, enabling timely and informed responses.

Monitor and manage risks

Integrate feedback into risk management systems to track resolution of individual concerns and identify broader trends.

Ensure transparency and consistency

Demonstrate fairness and accountability by applying a uniform process for receiving and addressing concerns.

Minimize conflict and legal escalation

Provide a structured channel for concerns to reduce the likelihood of disputes being expressed through protest or legal action.

Strengthen social performance and trust

Support meaningful engagement, foster stakeholder confidence, and contribute to maintaining EVR's social license to operate.

Scope

This feedback mechanism is available to all communities of interest (COIs) and rightholders. It applies to all operational activities carried out by EVR, including those undertaken by employees, contractors, and other associated personnel.

The mechanism is intended to address feedback related to EVR's interactions with COI and rightholders, including but not limited to:

- Community investment and social programs
- Economic development and local employment opportunities
- Environmental impacts and concerns
- Health and safety in relation to operational activities
- Land access, land use, and natural resource management
- Mining practices and operational conduct
- Transportation, infrastructure, and utilities
- Human rights and Indigenous rights as they relate to EVR's business activities

Feedback outside the scope of this mechanism includes:

- **Workplace grievances**, which will be referred to Human Resources
- **Criminal allegations**, which will be referred to law enforcement (e.g. the RCMP)
- **Ethical violations or compliance concerns**, which should be directed to Glencore's Raising Concerns Hotline

This procedure is intended to ensure that all relevant concerns related to EVR's external impacts are addressed in a consistent, timely, and respectful manner, in line with Glencore's commitment to responsible business practices and the UN Guiding Principles on Business and Human Rights.

Procedure

Alignment with UNGP

The feedback mechanism must be designed and implemented in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs), particularly the effectiveness criteria for grievance mechanisms. To ensure it serves as a credible and trusted tool for addressing complaints, grievances, and enquiries, the mechanism must meet the following requirements:

- **Legitimacy**
Operate with integrity, independence, and stakeholder trust, ensuring all parties have confidence in the process.
- **Accessibility**
Be well-publicized, culturally appropriate, and readily available to all communities of interest, including vulnerable and marginalized groups.
- **Transparency and confidentiality**
Provide clear information about how the mechanism functions while protecting the confidentiality and identity of individuals where appropriate.
- **Equitability**
Ensure all users can engage on fair and informed terms, with access to guidance or support if needed.
- **Dialogue-based**
Promote engagement, communication, and mutually respectful resolution rather than adversarial approaches.
- **Predictability**
Follow a consistent, time-bound process with clear procedures, responsibilities, and expected outcomes.
- **Embeddedness**
Be integrated into operational structures and supported by the necessary leadership, resources, and training to function effectively.
- **Continuous learning**
Be reviewed regularly to identify trends, improve responsiveness, and strengthen relationships with COI and rightsholders.

Where possible, the mechanism should be established at the earliest stages of a project or operational lifecycle to support the development of constructive relationships with affected COI and rightsholders.

- Facilitate employee and contractor engagement, ensuring that workforce concerns and contributions are actively considered in decision-making processes.
- Promote the use of diverse communication channels, including digital platforms, traditional media, and face-to-face engagement to ensure information reaches all relevant COI and rightsholders.
- Ensure engagement activities are aligned with Glencore’s sustainability and social performance objectives.

Channels of Communication

EVR will provide a range of accessible and culturally appropriate channels for communities of interest (COIs) and rightsholders to submit feedback. These channels will be:

- Technologically and culturally appropriate to the local context
- Inclusive and non-discriminatory
- Free of cost to individuals or communities
- Accessible to vulnerable or traditionally excluded groups, including Indigenous peoples, women, elders, youth, persons with disabilities, and those affected by poverty or limited education
- Capable of receiving both oral and written communication

Available feedback channels include:

- **Email, Telephone and Website**
COIs and rightsholders may submit feedback via by email (feedback@evr.com), through a toll-free number (1-855-806-6854) or the EVR website <https://www.glencore.ca/en/evr/contact>. The Feedback Coordinator is responsible for monitoring these channels at minimum twice weekly and ensuring timely entry into the feedback tracking system.
- **Verbal Feedback**
COIs may provide verbal feedback to the Feedback Coordinator or any member of the Social Responsibility team. Verbal input will be recorded and entered into the system in accordance with the same standards as written feedback.
- **Public Engagement Events**
Feedback may be submitted during public consultations or project-related events attended by EVR Social Responsibility staff or other designated personnel.
- **Third-party Channels**
COIs and rightsholders may submit feedback through community representatives such as mayors or designated delegates within the four core communities.
- **Proactive Outreach**
If public expressions of concern arise (e.g., through media or public forums) that have not been formally submitted, the Feedback Coordinator may—with approval from the Manager, Community and Indigenous Relations—proactively approach the affected party to encourage formal submission through the feedback mechanism.
- **Direct Meetings**
COIs and rightsholders may also meet in person with a member of the Social Responsibility team to submit feedback.

Use of a standard Feedback Submission Form is encouraged but not mandatory. Feedback submitted through any format will be formally recorded by the Feedback Coordinator in the tracking system.

Any feedback received by site personnel will be referred promptly to the Manager, Community and Indigenous Relations or the Feedback Coordinator for registration and processing. Site teams will be kept informed of relevant developments.

Publicizing the Mechanism

The Feedback Coordinator, with approval from the Manager, Community and Indigenous Relations will ensure that the mechanism is effectively communicated to COIs and rightsholders, including employees and contractors. Communication efforts will be tailored to the needs of diverse groups (e.g., seniors, youth, Indigenous communities) and may include:

- Printed and electronic media (e.g., newsletters, newspapers, posters)
- Online resources (e.g., EVR's website and social media platforms)
- Public information stands or booths
- Community events and public meetings
- Informational brochures (Appendix A) and feedback mechanism cards (Appendix B)
- Internal communications and workforce briefings

A record of all outreach and awareness activities will be maintained within the Stakeholder Information Management Tracking system.

The communications plan will incorporate the following elements:

- A clear, publicly accessible description of how the feedback mechanism works
- Clarification of who may use the mechanism and for what types of issues
- Assurance that the mechanism is fair, objective, and does not preclude access to judicial or non-judicial grievance channels
- Defined communication channels for submitting feedback
- Expected timelines for acknowledgment and resolution
- Commitment to anonymity, if requested
- Confirmation that there is no cost to use the mechanism

Internal awareness-raising efforts will be ongoing to ensure all staff and contractors understand the purpose and functioning of the feedback mechanism.

Receiving, documenting and acknowledging feedback

All non-anonymous feedback will be acknowledged by the Feedback Coordinator in writing (via email or letter) or phone call within five (5) working days of receipt. If literacy or accessibility barriers exist, efforts will be made to ensure acknowledgment is conveyed in a clear and inclusive manner through personal contact.

The written acknowledgment will include:

- A thank-you message for the feedback submission
- A brief explanation of the process and anticipated timeline

- Confirmation that the Feedback Coordinator is the designated point of contact, with full contact details provided
- Instructions for requesting status updates during the process
- Basic information on how to access the appeal process, if needed

A formal response to the feedback will be issued within twenty (20) working days of receipt.

All feedback—anonymous or otherwise—will be logged into the Stakeholder Information Management Tracking system by the Feedback Coordinator. This system will serve as a central registry for tracking feedback, documenting follow-up actions, and enabling management reporting and community transparency.

Reporting negative feedback

EVR assets are required to report all negative feedback as part of the corporate reporting obligations. This process ensures that individual negative feedback issues are addressed in a timely and consistent manner, while also facilitating the evaluation of feedback trends and patterns at the aggregate level across the organization. The reporting framework is structured according to a standardized categorization system that describes the feedback’s character, applicable management area, relevant policies, and the severity of the feedback. These reporting requirements are integrated into the **Stakeholder Information Management Tracking** system.

Escalation of Negative Feedback

Assets must ensure that negative feedback is appropriately escalated within the organization based on its severity.

Severity of Negative Feedback

Severity	Description	Site Notification	EVR Notification	Timeframe
Slight	Perceived short term impact to a single interest	Social Responsibility Team	N/A	Monthly
Minor	Real short-term impact to a single interest, or perceived widespread short-term impact	Manager, Community and Indigenous Relations	N/A	Monthly
Moderate	Real short-term, widespread impact, or perceived long-term impact	Manager, Community and Indigenous Relations and relevant Department Managers	VP, Sustainable Development	24 hours

Major	Real long-term impact to a single interest or strong perceptions of long-term impact	General Manager	VP, Sustainable Development	2 hours
Severe	Real, long-term, widespread impact, likely irreversible or life altering for those impacted	General Manager	CEO	2 hours

The Feedback Coordinator will assign feedback to one of the severity levels to determine the appropriate response and the necessary level of seniority for response approval. Severe feedback, particularly those relating to human resources or other sensitive matters, will be escalated beyond the Feedback Coordinator’s scope to senior management. The Feedback Coordinator may assist in these cases as required.

Where the feedback involves human resource issues, it will be referred to human resources. For grievances that require specialist departments or subject matter expertise (e.g., Environmental Health and Safety, Procurement), the Feedback Coordinator will ensure the necessary parties are involved in the investigation. If the feedback pertains to a Major grievance, the General Manager will be involved in the investigation process.

Preparing and communicating the response

Once feedback has been evaluated, and an investigation has been completed (in cases of Major negative feedback), the Feedback Coordinator, with support from relevant personnel and management, will prepare a formal response. The response will be appropriate in terms of language to ensure understanding, particularly when technical matters are involved.

The response will:

- Confirm whether the feedback provider is satisfied with the response.
- Provide further explanations or clarifications as needed, including over the phone if necessary.
- Be delivered within the committed timeline (no later than 20 working days from the date of feedback receipt).
- Include updates or next steps if more time or work is required to resolve the grievance.

The General Manager will approve all responses to Major grievances. In cases where the feedback pertains to issues outside the operation’s control, the response will include a clear explanation and may involve notifying the relevant external authority.

For anonymous feedback, the response will be handled case by case. The identity of the COI or rightsholder will not be disclosed in any public response, and anonymity will be maintained.

Seeking and documenting the response of the community of interest

For all feedback (except anonymous), the Feedback Coordinator will request confirmation from the COI or rightsholder, either verbally or in writing, regarding their satisfaction with the response. This will be recorded in the feedback - Stakeholder Information Management Tracking system.

- **If the COI or rightsholder affirms satisfaction**, the feedback case will be closed, and confirmation may be sought in writing.
- **If the COI or rightsholder is not satisfied**, the case will remain open, and the Feedback Coordinator will propose next steps, including the potential for re-evaluation or independent third-party involvement if necessary.

Access to an independent third party

In cases where resolution is not possible internally or where the COI or rightsholder requests, an independent third party may be engaged. This third party, mutually agreed upon by both the COI or rightsholders and EVR, may be involved in managing an appeals process, acting as a mediator, or conducting additional investigations.

Potential third parties include:

- Community authorities (e.g., neighborhood councils)
- Indigenous authorities (e.g., elders' councils, tribal councils)
- Government bodies (e.g., ombudsman's office)
- Recognized NGOs
- Academics or respected community leaders

Avoiding conflict of interest

To maintain impartiality and avoid any perception of conflict of interest, EVR ensures that individuals or departments implicated in a grievance do not play a central role in its investigation or resolution. In the event of such an occurrence:

- If the Feedback Coordinator is implicated, the investigation will be led by the Manager, Community and Indigenous Relations.
- If the Manager, Community and Indigenous Relations is implicated, the investigation will be led by the General Manager.
- For other implicated departments, a cross-department investigation will be undertaken to ensure neutrality.

Following up and reporting of feedback

The Feedback Coordinator and the Manager, Community and Indigenous Relations will monitor feedback and assess the effectiveness of the mechanism on an annual basis. This includes:

- Reviewing COI and rightsholder participation and identifying any underrepresented groups.
- Analyzing grievance trends and addressing systemic issues.
- Following up on unresolved or extended cases.

Results of monitoring and evaluation will be integrated into EVR's reporting system, with updates shared with COI and rightsholders as part of the community consultation process. All commitments made in response to feedback will be tracked and monitored to ensure follow-through and effectiveness.

Roles and Responsibilities (as applicable)

General Manager

The General Manager of each EVR asset holds overall accountability for ensuring the effective implementation of this feedback mechanism within their site. This includes oversight of timely, appropriate responses to concerns raised by communities of interest (COIs) and rightsholders and ensuring that site-level engagement aligns with EVR's social performance standards and Glencore's sustainability commitments.

Manager, Community and Indigenous Relations

The Manager, Community and Indigenous Relations is responsible for the strategic oversight, approval, and governance of the feedback mechanism, including the design, implementation, and continuous improvement of associated processes. This role ensures alignment with EVR's corporate policies and relevant international frameworks, including the UN Guiding Principles on Business and Human Rights.

Coordinator, Sustainability (Feedback Coordinator)

The Coordinator, Sustainability serves as the designated Feedback Coordinator, fulfilling this role alongside other core responsibilities outlined in their position description.

The Feedback Coordinator is responsible for the day-to-day operational management of the feedback mechanism. Key duties include:

- Ensuring clear and accessible communication of the mechanism to COIs and rightsholders

- Delivering internal awareness through employee and contractor inductions, as well as periodic refresher training
- Coordinating the logging, investigation, and resolution of feedback in a timely and respectful manner

The Feedback Coordinator will also prepare and submit quarterly and annual feedback reports to EVR Senior Management. These reports will be submitted through internal reporting channels and shared with the Elk Valley Communities of Interest Advisory Initiative (COIAI) Steering Committee as a standing agenda item. Summaries of the reports, including trends, responses, and outcomes, will be documented in meeting minutes and distributed to Advisory Partners for transparency and awareness.

Related documents

REG.HSEC.STD.HSEC.0007 Social Performance

REG.HSEC.STD.HSEC.0003 Human Rights

REG.HSEC.STD.HSEC.0008 Cultural Heritage

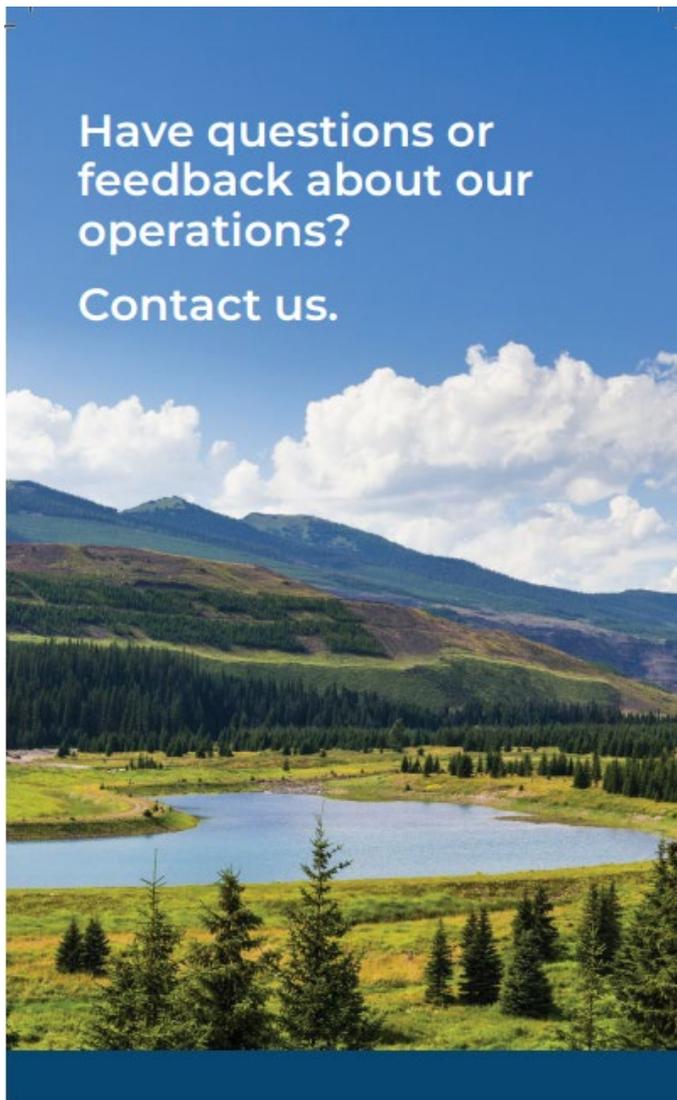
REG.HSEC.STD.HSEC.0011 Communication, Engagement and Participation

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Approver: Justin Paterson, Manager, Community & Indigenous Relations		2025-09-17

Appendix A - Feedback Mechanism Informational Brochures



Have a question or concern?

Contact us today

We will respond as quickly as possible and work to resolve concerns and answer all questions.

Your questions or concerns are likely shared by others, so your feedback helps us respond better to community needs and avoid similar situations across our operations.

Elk Valley Resources (EVR) operates four steelmaking coal mines in the Elk Valley, providing jobs for more than 5,000 people. We are committed to responsible resource development, environmental performance and building strong relationships with communities and Indigenous Peoples.

Learn more at
evr.com



Have questions or feedback about our operations?

Contact us



 1.855.806.6854

 feedback@evr.com

 evr.com/contact

Appendix B – Feedback Mechanism Cards

Contact us

Have questions or feedback about our operations?



1.855.806.6854



feedback@evr.com



glencore.ca/en/evr/contact