



COMMUNITIES OF INTEREST IDENTIFICATION AND ENGAGEMENT PROCEDURE (November 2023)

1. PURPOSE

The purpose of this Communities of Interest Identification and Engagement Procedure (the “**Procedure**”) is to outline the procedure for Hudbay Minerals Inc. (“**Hudbay**”), British Columbia Business Unit (“**Copper Mountain**” or “**Copper Mountain mine**”) to identify our local Communities of Interest (“**COIs**”) within the area of influence and/or within proximity to the Copper Mountain mine, located 20 km Southeast of Princeton BC. This Procedure defines the processes for engaging our COIs for consultation and addressing issues and/or questions brought forward by our COIs.

2. SCOPE

- (a) This Procedure applies to all Managers and Superintendents at Copper Mountain mine.
- (b) Both the Upper Similkameen Indian Band (“**USIB**”) and Lower Similkameen Indian Band (“**LSIB**”) have entered into a participation agreement with Copper Mountain (collectively, the “**Participation Agreements**”) which define an engagement process, and how priority topics will be identified and managed. To the extent of any actual conflict or inconsistency between this Procedure and the Participation Agreements, the Participation Agreements shall govern.

3. RESPONSIBILITIES

- (a) All Copper Mountain mine Managers and Superintendents shall review this Procedure and understand the process for identifying COIs and the mechanisms for responding to questions arising from COIs.
- (b) Identification of COIs shall be the responsibility of Copper Mountain mine’s General Manager, First Nations, Community, and Government Relations (“**General Manager**”), with input from Copper Mountain mine’s Materials Management Superintendent and other Managers, as required.
- (c) It is the responsibility of each of Copper Mountain mine’s Materials Management Superintendent and General Manager to review the list of COIs, at a minimum frequency of once per calendar year, to determine if additions are required.
- (d) It is the responsibility of Copper Mountain mine’s Materials Management Superintendent to coordinate and assure responses are provided to issues identified or brought forward by the COIs.

4. REFERENCE DOCUMENTS

Copper Mountain’s Local Community Business and Employment Engagement Policy (as amended, restated, supplemented or otherwise modified from time to time).

5. PROCEDURE

5.1 Identification of COIs

(a) Current COIs – Copper Mountain has identified the following communities as COIs as it relates to this Procedure:

- USIB located in Hedley;
- LSIB located in Cawston;
- Town of Princeton;
- Village of Keremeos;
- The Regional District of Okanagan Similkameen, Area H;
- The Regional District of Okanagan Similkameen, Area G;
- The Regional District of Okanagan Similkameen, Area B;
- Princeton and District Chamber of Commerce;
- Keremeos and District Chamber of Commerce;
- Copper Creek Ranch;
- Rock Ridge Canyon;
- Elk Ridge Outdoors;
- Owners of Kennedy Lake;
- Ferguson Ranch;
- Smith Ranch; and
- Atkinson Ranch.

Copper Mountain has identified the above listed communities as COIs due to the direct or indirect impact or potential impact that our operations may have on them. Without limitation, the following criteria shall be considered when evaluating a community or group of individuals as a COI:

- The community has an economic interest or has the potential to become significantly impacted economically, either positively or negatively by Copper Mountain procuring goods and/or services from businesses within the community or by Copper Mountain ceasing to procure goods and/or services from businesses within the community;
- Copper Mountain employs individuals from the community in a number that is material relative to the size and population of the community, as the community could be impacted socially and/or economically by the employment or termination of employed individuals residing within the community;
- Communities that are downstream and within close proximity (<100km) of Copper Mountain mine along the Similkameen River basin and may be significantly impacted environmentally, as a result of the operation of Copper Mountain mine; and
- Any other significant economic, social, or environmental reasons, as deemed by the General Manager, that a community or group of individuals may be impacted by the operation of Copper Mountain mine.

(b) Review of COIs – Copper Mountain will, at a minimum frequency of once per calendar year, conduct a review of its operations. If a community that has not previously been defined as a COI becomes, in the determination of Copper Mountain, a COI based on the criteria noted above, the community will be engaged as defined herein.

(c) Self-Identification as COI – If an individual or organization not identified as a COI pursuant to this Procedure requests to identify as a COI, such individual or organization may contact Copper Mountain mine's Materials Management Superintendent or the General Manager. Copper Mountain mine's Materials Management Superintendent and the General Manager will review any such request with the applicable individual or organization to determine whether such

individual or organization meets the criteria set forth above to qualify as a COI. A response to the request will be made by Copper Mountain mine's Materials Management Superintendent within thirty (30) days of any such request.

Individuals or organizations requesting to identify as a COI may request confidentiality throughout the process described above. In the event such a request is made, Copper Mountain will use commercially reasonable efforts to ensure the identity of the individual or organization and the discussions between the parties during such process are kept confidential.

5.2 Engagement and Consultation of COIs

Consultation with various COIs will be completed to determine the appropriate frequency for engagement. The engagements will be carried out annually as per agreed frequency. Copper Mountain mine's Materials Management Superintendent shall coordinate a meeting and invite designates from each COI to participate. The purpose of the meeting will be to provide the COIs with information regarding Copper Mountain mine's current and future operations. Additionally, the meeting will act as a forum for COIs to ask questions. Responses to questions raised at the meeting shall be addressed by Copper Mountain, in a timely manner, in accordance with Section 5.3 of this Procedure, below.

5.3 Communication and Response Mechanism

- (a) Copper Mountain shall appoint a secretary to record minutes from major COI meetings noted above with all meetings documented in a register. In the event any COI asks questions that cannot be answered or addressed by Copper Mountain at the meeting, they will be noted in the meeting minutes. An individual representative from Copper Mountain will be assigned to answer each outstanding question. It will be the responsibility of Copper Mountain mine's Materials Management Superintendent to coordinate a response to the outstanding questions and share this with all COIs. If a further response is required, the issue will be escalated directly to the General Manager. COIs can reach out to Copper Mountain mine's Materials Management Superintendent or message through the Copper Mountain website to report any grievances that they have. All responses and correspondence arising from questions relating to the COI meetings and the grievances reported will be documented and provided to concerned COIs within a period of thirty (30) days. Record-keeping relating to all such documentation shall be the responsibility of Copper Mountain mine's Materials Management Superintendent.
- (b) Minutes from the COI meetings shall be distributed to a delegate for each respective COI and communicated to constituents for each COI as deemed necessary by the area delegate. In order to support accessibility, individuals may also request a copy of all COI meeting minutes from Copper Mountain mine's Materials Management Superintendent or the General Manager via phone or email, as provided below.

5.4 Document Review

This Procedure will be reviewed for consistency with Copper Mountain's overall policies and procedures annually. Such review will be conducted in consultation with all COI designates at the frequency noted above. Requests for changes and/or modifications from COIs will be directed to Copper Mountain mine's Materials Management Superintendent for consideration and, if deemed appropriate, incorporation into this Procedure. In the event that the proposed changes and/or modifications cannot be agreed upon, the request for such changes and/or modifications may be escalated to the General Manager for final decision.

6. CONTACT INFORMATION

Materials Management Superintendent

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ACCEPTANCE AND CONFIRMATION:

Per: *(signed) Frank Catalano*

Name: Frank Catalano

Title: General Manager, First Nations, Community and Government Relations

Per: *(signed) Cory Forcier*

Name: Cory Forcier

Title: Materials Management Superintendent