



## COMMUNITIES OF INTEREST IDENTIFICATION AND ENGAGEMENT PROCEDURE (November 2024)

### 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, Superintendents, and Directors 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.
- (c) The procedure applies to our communities of interest (COI) mentioned in 5.1

### 3. RESPONSIBILITIES

- (a) All Copper Mountain mine Managers, Superintendents, and Directors 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, other Managers and Directors, and any COIs or future identified COIs .
- (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 ensure 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 and [Hudbay's Code of Business Conduct and Ethics](#) (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:

###### Tier 1– Deep Engagement

- USIB located in Hedley;
- LSIB located in Cawston;

###### Tier 2– Notification-level Engagement

- 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;

###### Tier 3– Needs-based Engagement

- Princeton and District Chamber of Commerce;
- Keremeos and District Chamber of Commerce;
- Copper Creek Ranch;
- Rock Ridge Canyon;
- Elk Ridge Outdoors (presently a non-operating business);
- Owners of Kennedy Lake;
- Ferguson Ranch;
- Smith Ranch; and
- Atkinson Ranch.

###### **Tiers of Engagement** Definitions:

**Tier 1– Deep Engagement:** Ongoing, proactive, and collaborative, Deep Engagement involves the most frequent and multi-directional communication and relationship, where the COIs have the highest level of influence. These COIs receive all relevant information, collaborate on project processes, and decisions, and participate in engagement with Copper Mountain across any platforms.

**Tier 2– Notification-Level Engagement:** Information and updates are shared with Notification-level COIs as relevant, at varying frequencies, when requested, and at least yearly when updates are presented.

**Tier 3– Needs-based Engagement:** As, and if, COIs identify particular needs or information requests, or if Copper Mountain identifies information valuable to share, engagement and

communication are undertaken. Tier 3 COIs are invited to all open houses, community events, and are encouraged to reach out to Copper Mountain as needed.

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 and/or social interest or has the potential to become significantly impacted economically and/or socially, 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 the 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.
  - Self-identified COIs coming forward prior to inclusion in this procedure will participate in discussions with the General Manager to confirm inclusion as COIs in 5.1 (a)
- (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 via phone or email, as provided below. 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. Engagements will be carried out as appropriate based on the COI tiers defined in section 5.1 (a). Copper Mountain mine's Materials Management Superintendent shall coordinate engagement and invite designates from each COI to participate. The purpose of engagement will be to provide the COIs with information regarding Copper Mountain mine's current and future operations. Additionally, engagement will act as a forum for COIs to ask questions. Responses to questions raised at an engagement 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 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 are welcome to use existing mechanisms of communication, they 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) Information and/or minutes from the COI meetings can 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 COI meeting minutes and/or information 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

Cory Forcier

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Copper Mountain Mine Website

Contact Form: <https://hubbaycoppermountain.com/contact/>

**ACCEPTANCE AND CONFIRMATION:**

Per: *(signed) Frank Catalano*

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*Name: Frank Catalano*

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

Per: *(signed) Cory Forcier*

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*Name: Cory Forcier*

*Title: Materials Management Superintendent*