



## Responses to Inclusive Development International Right to Reply letter dated February 26, 2025

### 1. Response on information about Compagnie des Bauxites de Guinée (CBG) :

We want to ensure that IDI has the most updated and complete information on CBG for your public website. This information should include the 2024 Ramboll Environmental and Social Monitoring Report which will be publicly available shortly and the Aluminium Stewardship Initiative [ASI Audit Report Compagnie des Bauxites de Guinee - CBG Certificate](#) which was issued in December 2024.

We believe it is more appropriate to have CBG – rather than its non-managing, indirect shareholder – provide this information to you directly when it is available. As such, we have provided your request directly to CBG.

We encourage you to engage directly with CBG when seeking the most updated and complete information on the operation.

### 2. Response on Rio Tinto Simfer (Simandou) related to community and human rights topics:

Simandou is a complex, uniquely transformative project. From the associated infrastructure corridor to the thousands of jobs the project will create, the project will positively impact the Guinean economy, creating opportunities and development potential which will benefit the people of Guinea for generations to come. As with any significant development project, challenges will need to be carefully managed, including minimising adverse social, health, safety and environmental impacts while simultaneously fostering positive and tangible change for local communities and other key stakeholders. Throughout the history of our involvement in the Simandou project, we have maintained regular community consultation forums and sessions designed to maintain dialogue with local communities by addressing questions, concerns and additional opportunities to provide support. We are committed to developing the Simandou project in line with internationally recognised environmental, social and governance standards. This includes transparently reporting on impacts of our mining operations, and continuing to work alongside local stakeholders on ways of mitigating these impacts. We recognise the responsibility we are entrusted with and see ourselves as long-term stewards of natural resources. We will continue to work alongside communities to ensure the Simandou project is developed with environmental stewardship and social wellbeing at its core.

The full set of Project Standards are set out at: <https://www.riotinto.com/-/media/Content/Documents/Sustainability/Ethics-and-integrity/Transparency/RT-Simandou-Amended-consolidated-basic-convention-EN.pdf>

SimFer published the Mine and Rail Spur Environmental and Social Impact Assessment (ESIA) in July 2024. The ESIA addresses several concerns related to community impacts and environmental degradation, and mitigation measures, including:

- Simfer aims to minimize displacement by avoiding important community lands and access routes. When unavoidable, they will implement compensation through a Framework for Land Acquisition, Resettlement, and Compensation in line with IFC Performance Standard.

This framework includes in-kind and financial compensation to restore and improve the livelihoods of affected people, based on detailed surveys and consultations.

- Acknowledges the prohibition of fishing in the Pic de Fon Classified Forest and the potential impacts on aquatic ecosystems due to changes in water flows and quality. Mitigation strategies include protecting sensitive catchments and ensuring water quality through sediment controls and treatment of effluents.
- Recognizes the potential impacts on farmland from mud, dust, and flooding caused by railway construction, with measures to minimize displacement and mitigate impacts by avoiding important community lands and access routes wherever possible.
- Addresses concerns about polluted waterways by implementing a Mine Water Management System to protect water quality, including sediment controls, treatment of acid drainage, and emergency procedures for leaks or spills.
- Acknowledges the negative impacts on livelihoods, including loss of homes and farmland, and pollution affecting agricultural soils and livestock health. Compensation and support measures are planned to mitigate these impacts.

Please see our 2024 Annual Report page 81 and read more at: <https://riotintoguinee.com/en/> and <https://www.riotinto.com/en/operations/projects/simandou>

Please see the ESIA available at <https://simfer-sa.com/en/disclosures/>

### **3. Response on Rio Tinto Simfer (Simandou) related to environmental and biodiversity topics:**

The Rio Tinto Simfer portion of the rail is outside of chimpanzee habitat areas. For more information about management of impacts to chimpanzee habitat along the rail please see the Winning Consortium Simandou ESIA.

For the Simfer mine development in Blocks 3 and 4, significant effort has been employed, where possible, to avoid impact to areas of Natural Habitat and Critical Habitat. One of many examples is the relocation of mining infrastructure to the east of the Simandou Ridge, which is a key avoidance measure to reduce the impact on Chimpanzees on the western side of the range. This design change added significantly to the project complexity, but demonstrates Simfer's commitment to application of the mitigation hierarchy. Avoidance measures for chimpanzees are also being applied at numerous other sites, including the HME2 haul road design around the Boyboyba Forest.

Please see the ESIA available at <https://simfer-sa.com/en/disclosures/> - including Chapter 10 – Biodiversity.

The Mine and Rail Spur ESIA published in 2024 and the draft of the Oueleba North ESIA (currently under review by the Government of Guinea) has assessed the potential impacts to the streams in the mining concession that are headwaters of the Niger River. The potential impact on the river's ecology and quality has been assessed, and impacts to river flows (including transboundary flows) are not anticipated. Ongoing assessments to confirm the conclusion of the impact assessments will be done.

As part of the mitigation strategy, Rio Tinto Simfer has developed a Water Management Framework, which includes a Mine Water Management Plan, and a Mineral Waste Strategy and Mineral Waste Management Plan to provide an overarching approach that encompasses mitigation

measures designed to reduce and mitigate the potential impacts of the Project to the aquatic environment. Erosion control measures and rapid vegetation establishment on disturbed slopes is being implemented to minimize impacts during construction. Where instream work is required (e.g., for the installation of culverts), temporary stream diversions and relocation of aquatic species are done to minimize impacts. In addition, biodiversity assessments are monitoring status of the aquatic communities in and downstream of the mine concession.

Please see the ESIA available at <https://simfer-sa.com/en/disclosures/> - including Chapter 6 – Water Environment.

#### **4. Response on Bougainville Copper mine**

The situation at Panguna mine is uniquely complex. Rio Tinto was not the operator of the mine and has not been present in Bougainville since the civil war caused Bougainville Copper Limited to exit in 1989. Rio Tinto divested its 53.83 per cent majority shareholding in BCL to the ABG and the PNG Government in 2016 for no consideration, enabling ABG and PNG to hold an equal share in BCL of 36.4 per cent each. Following the outbreak of conflict, the mine was not able to be maintained by BCL, and no data was gathered in the 35 years that followed 1989.

Rio Tinto however, has and continues to take action aligned with our human rights commitments. Since 2022, Rio Tinto has been actively participating in the independent Panguna Mine Legacy Impact Assessment (PMLIA) process to identify and assess environment impacts (and directly connected social and human rights impacts) caused by the Panguna mine since 1989. Rio Tinto is one of several stakeholders in the PMLIA process, which is overseen by an Oversight Committee made up of representatives from the Government of Papua New Guinea, Autonomous Bougainville Government (ABG), landowner and community representatives, Bougainville Copper Limited (BCL), Rio Tinto and the Human Rights Law Centre.

A comprehensive impact assessment was conducted by independent experts from consultancy Tetra Tech Coffey (TTC) during 2023 and 2024. The PMLIA was completed and released in December 2024 following consultation with affected communities. On the publication of the report, Rio Tinto made clear it accepts the findings. In November 2024, Rio Tinto, BCL and the ABG announced they had signed a Memorandum of Understanding (MoU) to form a Roundtable to discuss ways forward to address the findings of the PMLIA.

Rio Tinto has been the majority funder (along with BCL) of the PMLIA as well as the governance aspects of the process, enabling the progress that has been made so far.

Now that the impacts have been assessed, Rio Tinto participated in the first meeting of the newly established Roundtable in March 2025. Under the MoU, the Roundtable parties plan to work together, consult with impacted communities, and establish a process to agree on how to remedy actual and potential impacts identified in the PMLIA. Rio Tinto has already announced publicly that it is intended this will include a remedy mechanism consistent with the UN Guiding Principles. This stage of the PMLIA will take time given the complexity of the issues, the numerous parties involved and the operating context in Bougainville

In addition to the above:

- Rio Tinto is actively supporting the ABG in communicating and educating people on the ground in Panguna about the risks posed by instability in the pit and tailings slopes where artisanal small-scale miners work.

- Rio Tinto is supporting BCL in addressing severe and imminent risks to nearby communities from ageing infrastructure that were identified by the independent contractor as part of the LIA.
- Separately to the LIA, Rio Tinto is funding a water and sanitation social project through World Vision to assist local communities in Bougainville.

Please see our 2024 Annual Report page 82 and <https://www.riotinto.com/en/news/trending-topics/panguna-mine>

## 5. Response on Resolution Copper

Resolution Copper remains committed to ongoing dialogue with Native American Tribes and local communities. Over the past decade, this good faith effort through consultation, coordination and engagement has led to significant changes to the project, including reducing the original land exchange area by approximately 830 acres to avoid and minimize impacts to areas of concern. Resolution Copper has carefully listened to tribal members, including those from the San Carlos Apache Tribe, and their input has played a crucial role in shaping the mine plan. As a result, the plan submitted to the U.S. Forest Service demonstrates a commitment to foregoing portions of the ore body to protect Apache Leap, Queen Creek, and Devil's Canyon. Beyond project design, Resolution Copper is dedicated to supporting Tribes through training, employment opportunities, economic empowerment, and the preservation of cultural heritage. Apache Stronghold has filed a petition with the U.S. Supreme Court requesting a review of the 9th Circuit's decision, which ruled in favor of the U.S. Forest Service. The Supreme Court has yet to decide whether it will hear the case.

The US Forest Service (USFS) continued work to progress the Final Environmental Impact Statement and complete actions necessary for the land exchange. We continued to advance partnership discussions with several federally recognised Native American Tribes who are part of the formal consultation process. We are also monitoring the Apache Stronghold versus USFS case held in the US Ninth Circuit Court of Appeals. While there is significant local support for the project, we respect the views of groups who oppose it and will continue our efforts to address and mitigate these concerns.

Please read more at our Resolution Copper website: <https://resolutioncopper.com/myth-and-facts/>

## 6. Response on QMM

QMM operates in a highly sensitive area from a water and broader environmental perspective. The local communities are farmers and fisherfolks, and rely on the rivers and lakes surrounding QMM's operations for their livelihoods. These communities are our neighbours and we take our responsibility to them very seriously.

- Water quality monitoring  
QMM conducts an extensive water quality monitoring program on water within its mine lease area and around Mandena, in compliance with regulatory requirements. It also conducts additional monitoring and sampling of groundwater, surface water, and marine water quality for the Port d'Ehoala activities. QMM water monitoring data has been published in the QMM Water Report 2021-2023, available on the QMM section of the Rio Tinto website (Water Report). The metal monitoring data presented in the Water Report is derived exclusively from external laboratory data obtained from the accredited laboratory

Eurofins Environment Testing Australia (ISO/IEC 17025 accredited laboratories). Beyond its accredited quality assurance procedures, this facility performs water quality analyses with limits of analytical detection tailored for environmental assessment. The Water Report confirms that no freshwater was extracted for use in mineral processing operations during the 2021 to September 2023 period, with 100% of QMM operations' water demand supplied through water recirculation. Within the receiving environment of QMM's operations, metal concentrations upstream and downstream of QMM's authorised release point have been comparable for all regulated metals since the start of operation of the water treatment plant, with the majority of samples below laboratory limits of detection. Uranium and Lead, which were previously identified as constituents of potential concern (in the water report covering the 2015-2020 period), were all shown to be below analytical limits of detection upstream and downstream of the release point during the period of the Water Report. This is consistent with the findings of the third-party community study of radiation undertaken by JBS&G Australia Pty Ltd (JBS&G), published in September 2023 (further details below).

As part of its water strategy, QMM publishes a monthly water dashboard, which sets out information regarding its water management and performance, including rainfall, volume of water discharged and water quality data from weekly sampling campaigns. In addition, in 2024, independent environmental experts WSP Canada Inc. have commenced a receiving environment assessment of QMM's operations with the intention to complement QMM's existing water monitoring program. WSP's work continues iteratively, in that each field visit informs the further study required.

- JBS&G community radiation study

In 2019, the Andrew Lees Trust (ALT UK – a civil society organisation) commissioned a study, based on QMM's data, which claimed that QMM's activities may have caused elevated levels of radiation around Mandena (2019 ALT UK report). Following those allegations, in 2019 QMM commissioned a study to assess that risk with independent international radiation expert, JBS&G Australia Pty Ltd (JBS&G). The scope of the study was to enhance the baseline environmental radiation knowledge of the site and surrounding communities, and to help provide a scientific basis for future monitoring. Addressing the findings and recommendations of the 2019 ALT UK report were a key component for the scope of work for the study. The three-year JBS&G study, published in September 2023 (available on the QMM website), concludes there is no basis for heightened health concerns around local radiation levels.

The analysis received on the five cycles covering various seasons from November 2019 to October 2022 shows that local food sources, water, air and dust are safe from a radiological perspective. The study involved collecting samples within surface water, groundwater, soil, sediment, land foods, aquatic foods, air and dust, and testing for radiation. More than 260 samples (including 377 individual fish) were collected under strict quality control conditions to ensure reliable and precise data. Samples were shipped to Australia for analysis at one of the world's leading radiation laboratories, the Australian Nuclear Science and Technology Organisation (ANSTO). Mineral elements deposited broadly across the region contain natural radiation. Companies such as QMM that remove mineral elements containing natural radiation must monitor to ensure their activities do not increase radiation levels above an established global reference level. JBS&G found QMM's contribution to radiation dose within the community to be far smaller than the variation in natural background radiation levels and below national and international regulatory limits for radiation. The JBS&G study is one of the most comprehensive of its type ever undertaken and was commissioned as one of a number of steps QMM is taking to reinforce international best practices and scientific-based standards in monitoring its environmental impacts, and the impacts on host communities.

Please see <https://www.riotinto.com/en/operations/madagascar/qit-madagascar-minerals> and our 2024 Annual Report page 81

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MARCH 12, 2025