Our Approach to Human Rights

Which Teck sites does this document apply to?
This document summarizes our approach to managing human rights. This document applies to all Teck sites and projects. This does not include operations in which Teck has/had an ownership interest but is not the principal operator.


Background
As adopters of the United Nations Guiding Principles on Business and Human Rights (UNGPs), we are committed to respecting the rights of our employees, the communities in which we are active, and others affected by our activities. We recognize that the nature of mining activities, whether in exploration, construction, operation or closure, create the potential for a wide range of human rights risks and we work to mitigate those risks. Where we have caused or contributed to adverse human rights impacts we will contribute to their remediation as appropriate.

Member companies of the UNGPs are expected to express risks and impacts to people and assess severity as an impact to that person rather than as a reflection of the resultant impact to business and reputation. Teck has a multi-disciplinary group called the Human Rights Working Group, whose purpose is to evaluate potential and actual impacts to people and human rights across the business.

We have adopted the UN Guiding Principles Reporting Framework to report on how we respect human rights in line with the Guiding Principles, and will use this framework to disclose our performance annually through our annual sustainability report.

Human Rights through the Mining Life Cycle

Human Rights Management During Exploration
Prior to entering a country to conduct exploration activities, we assess a range of social risks associated with operating in each jurisdiction, including those relating to:

- National security, including terrorism, social unrest, border conflict, religious conflict and ethnic conflict
- Personal security, including kidnapping, extortion, hijacking and robbery
- Personal health, including access to safe water, pollution levels, sanitation and disease

Based on the results of these assessments, we decide whether it is appropriate for us to pursue exploration activities in a given location.

Human Rights Management at Projects
Our approval process for new projects and major investments integrates social risk considerations, including risks to human rights, from the start. As a result, social and human rights issues are taken into consideration during project design, evaluation and decision-making.

Human Rights Management at Operations
Teck undertakes specific multidisciplinary human rights self assessments every two years with our operations to identify local issues of potential human rights risk. Teck has further integrated the consideration of human rights into our ongoing assessments of social risk and social management plans as part of our Social Management and Responsibility at Teck (SMART) Framework. Teck continues to focus corporate policy, guidance and best practice development on those human rights issues most salient to the company.

Human Rights Management in Joint Ventures (JVs)
Teck has several joint venture partners, including, for example, Newmont Corporation. Teck partners with Newmont Corporation on NuevaUnión, a joint venture in the Atacama Region of Chile. Teck and Newmont Corporation are committed to ensuring that the project undertakes meaningful engagement with communities to better understand current human rights conditions and the
risks and opportunities associated with human rights in the region. Newmont Corporation and Teck have a shared committee that is responsible for ensuring JV partners are represented in the Health, Safety, Environment and Community (HSEC) sphere.

**Human Rights Key Industry Risks**

Key industry risks as defined by the Corporate Human Rights Benchmark Methodology 2019 are risks commonly regarded as potentially severe or likely within the extractives industry and that companies are expected to demonstrate, through a process of human rights due diligence, how they are preventing them or why they are not relevant.

**Governance and Accountability**

The Board of Directors, through its Safety and Sustainability Committee, broadly oversees health, safety, environment and community policies, systems, performance and auditing, including implementation of our HSEC Management Standards. The Safety and Sustainability Committee Terms of Reference specifically includes the responsibility to manage the risks and responsibilities associated with human rights. Teck’s Board of Directors and senior management team regularly consider human rights impacts and risks associated with ongoing activities and material incidents.

---

**Key Industry Risk | Approach to Managing the Key Industry Risk**

| Freedom of association and collective bargaining | See Our Approach to Relationships with Communities |
| Health and Safety | See Our Approach to Health and Safety |
| Land Rights—Resettlement | Although Teck’s requirement for resettlement has been limited to date, we recognize that it is a complex, personal and emotional process, requiring thoughtful consideration and management. When it is necessary, Teck conducts resettlements in compliance with accepted international standards, including World Bank Operational Policy 4.12 and the International Finance Corporation Performance Standard 5. Teck’s SMART Framework also includes a specific set of guidelines for resettlement planning that include the development of a socio-economic baseline and impact assessment, planning a census survey and an asset inventory, and providing guidance on engaging with those people affected by the project. |
| Land Rights—Artisanal or Small-Scale Miners | We regularly monitor our sites for the potential presence of artisanal or small-scale miners on or adjacent to our operations, particularly in Chile. Should these instances occur, our approach focuses on the improvement of health, safety and the environment as well as the community impacts of small-scale mining extraction. These efforts help strengthen the livelihoods of these miners by providing guidance on occupational safety and best practices, in collaboration with government. Such activities also seek to establish agreements between the small-scale miners and government on security, mining and rehabilitation. |
| Security | We have third-party security personnel at some of our sites, including Trail Operations, Antamina, Carmen de Andacollo and Quebrada Blanca. Where we have security personnel, contracts require adherence to the Voluntary Principles on Security and Human Rights. Training for security personnel is completed annually, and is overseen on a regular basis by Teck’s Risk Group. Training also occurs if and when we change security companies at our operations. |
| Water and sanitation | See Our Approach to Water Stewardship |

---

1 These risks have been defined in the Corporate Human Rights Benchmark Methodology document.

2 As a member in the Mining Association of Canada our security practices are verified through the MAC TSM process annually. The standards to which we are verified are in line with the Voluntary Principles.
Teck has an internal Human Rights Working Group (HRWG) to align and focus efforts across the organization in support of embedding Teck’s Human Rights Policy. Members of HRWG work together to enhance Teck’s human rights management and reporting, to increase awareness and internal alignment on human rights, and to strengthen the network of human rights practitioners at Teck. This group is director-level and multi-disciplinary, and meets to learn about new initiatives in business and human rights as well to share best practices and efficiencies in their management approaches (ie training, impact identification, reporting tools). This group does not serve a governance role but rather one of peer learning and influence.

**Approach to Managing Human Rights**

Teck operates mines in Chile, Canada and the U.S., and we have projects in Chile, Peru, and Mexico as well as exploration activities globally. At Teck, we manage our impacts to people across our business in following departments: Health and Safety, Risk and Security, Human Resources, Contracts and Procurement and Community Relations. Each of these departments represent key components of Teck’s management of human rights.

**Respecting Human Rights**

**Identifying and Assessing Salient Human Rights Risks**

Each year, Teck’s Human Rights Working Group identifies human rights risks and impacts through a saliency assessment. During the saliency assessment, we identify and prioritize the most significant human rights risks to individuals throughout our value chain so we can better focus our policies and programs that have the biggest impact on people impacted by our business activities.

In 2019, we conducted our saliency assessment in line with the UNGPs. This process included:

- Desktop research including a review of relevant internal policies and procedures, peer review benchmarking, and a media scan. This review considered social, geographical and economic factors that influence our impacts on human rights.

- Internal stakeholder interviews from a diverse cross-section of Teck business areas, and reviews of our biannual operations human rights self assessments.

- A workshop to prioritize the most significant human rights risks to individuals with multidisciplinary attendees.

The output of the workshop included both a heatmap of salient risks and an action plan to prioritize activities for 2020. For more information, see the table ‘Human Rights Issues that are Salient to Teck’ in our 2019 Sustainability Report.

Respecting rights remains a core objective across Teck’s operations and we continue to evolve our approach to manage impacts to people enterprise wide. Further information related to our commitments and management approach towards our impact on people can be found in in **Our Approach to Health and Safety**, **Our Approach to Relationships with Communities**, **Our Approach to Relationships with Indigenous Peoples**, and **Our Approach to Diversity and Employee Relations**.

---

3 Teck’s operations are in Chile, Canada and the United States and only one current operation is Fly in Fly out.

4 Our operations complete a biannual self assessment with the Human Rights Working Group chair that involves the General Manager of each operation and their nominees for Human Resources, Environment and Communities, and Supply management/ materials management/procurement. This information forms an input into our saliency assessments.
Grievance Mechanisms

We are committed to engaging with our communities of interest on our human rights impacts and to reporting on our performance. We expect our employees and contractors, as well as community members, to bring human rights concerns to our attention through our site-level feedback mechanisms and our Doing What’s Right hotline. Doing What’s Right is our program designed to maintain an ethical workplace and to ensure that our moral and ethical principles within our Code of Ethics are upheld. This program accepts complaints in the languages of all countries where Teck is active (see Our Approach to Business Ethics for more information). Our Doing What’s Right program prohibits retaliation against any person reporting a Concern in good faith, or participating in an investigation relating to a Concern. This program also serves as a practical measure to prevent intimidation of union representatives or workers. Individuals making a claim as part of this program are not required to waive any rights.

Support for State-Based Judicial and Non-Judicial Mechanisms

Teck does not impede access to state-based judicial or non-judicial mechanisms or other mechanisms (such as international mechanisms) for persons who make allegations of adverse human rights impacts. We do not require individuals to permanently waive their legal rights to bring a claim through a judicial process as a condition of participation in a grievance/mediation process with Teck. We also do not impede access by competent authorities investigating and adjudicating credible allegations of human rights impacts. We participate in non-judicial grievance mechanisms provided by the state where these are available to resolve grievances.

Responding to Negative Feedback and Incidents, Access to Remedy

All operations, major projects and exploration sites have implemented site based feedback mechanisms, which allow for the collection and responses of complaints or feedback. In some cases these complaints or feedback are related to actual or perceived human rights impacts.

Community incident procedures continue to be embedded in Teck’s HSEC incident reporting processes. In all environmental incidents, community-related impacts and consequences are considered. Depending on the severity of the incident, an in-depth root cause analysis of the incident may be conducted. Where the incident has a perceived or actual impact to human rights, appropriate expertise is made available to the site to manage or mitigate the impacts.

Teck has an enterprise wide-system that our sites use to track feedback and complaints. The system allows specific complaints to be identified as human rights issues, breaches of a commitment, or related to environment or health and safety issues. There is escalation criteria based on our HSEC Risk management criteria, where human rights impacts are included. Depending on the severity of the complaint, increasingly more individuals and more senior individuals are notified of the complaints.

Our operations’ state in their procedures the number of days they will take to acknowledge and respond to complaints. The system has a default countdown timer to encourage a 20 day response time for each of the complaints. A key new function of this system is a specific workflow to allow sites to record and monitor activities to remedy efforts related to the complaint. This will support our ability to monitor the activities to remedy being offered in response to the complaints and to ensure that the remedy efforts reflect the severity of the complaint. See the Relationships with Communities chapter of our 2019 Sustainability Report for more information on how we respond to negative feedback and incidents.

Policies and Standards

Our Human Rights Policy outlines our commitment to respecting the rights of our employees, the communities in which we operate and others affected by our activities. We expect our suppliers and business partners, including joint venture partners, to share this commitment and to put in place policies and processes that support respect for human rights. The table below provides additional details on Teck policies that address particular human rights aspects.

Salient Human Rights, Teck Policies and Management Approaches

<table>
<thead>
<tr>
<th>Specific Human Right</th>
<th>Teck’s Commitments</th>
<th>Relevant Policies, Management Approach and Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Right to Life¹</td>
<td>• We are committed to respecting and observing all human rights, as articulated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the ILO Core Conventions. • Working together we can eliminate fatalities and serious injuries in the workplace; we will accept nothing less. Everyone has the right to a safe and healthy workplace.</td>
<td>• Teck’s Human Rights Policy • Teck’s Health and Safety Policy • Our Approach to Human Rights • Our Approach to Health and Safety</td>
</tr>
</tbody>
</table>

¹ Currently Red Dog is transitioning to an improved process of assessing feedback and determining remedy and will be co-designing a process with Communities of interest in 2020.

² Remedy is a key component of the Guiding Principles and the concept is that the company should take actions to mitigate the impact to the person not just manage the business or legal risk related to the complaint.
| Right to Safe and Healthy Working Conditions | We are committed to everybody going home safe and healthy every day. We are committed to respecting and observing all human rights, as articulated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the ILO Core Conventions. We are committed to providing a workplace free of discrimination where all employees can fulfill their potential based on merit and ability. Teck respects and appreciates differences in age, ethnicity, Indigenous origin or heritage, gender, physical attributes, beliefs, language, sexual orientation, education, nationality, social background and culture or other personal characteristics. Our Code of Ethics and Anti-Corruption Policy affirms our commitment to upholding high moral and ethical principles and specifies the basic norms of behaviour for those conducting business on its behalf. Our suppliers’ commitment to and fulfillment of the Supplier Expectations is a matter of paramount importance to Teck and will be assessed as a factor when Teck considers awarding commercial opportunities. |
| Right to Freedom of Association, assembly and collective Bargaining | We are committed to providing a workplace free of discrimination where all employees can fulfill their potential based on merit and ability. We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, workers in our supply chain, members of the communities where we operate, or others who are affected by our activities. We expect our suppliers and business partners to share this commitment and to put in place policies and processes that support respect for human rights. Our Code of Ethics and Anti-Corruption Policy affirms our commitment to upholding high moral and ethical principles and specifies the basic norms of behaviour for those conducting business on its behalf. Our suppliers’ commitment to and fulfillment of the Supplier Expectations is a matter of paramount importance to Teck and will be assessed as a factor when Teck considers awarding commercial opportunities. |
| Right to not be subjected to slavery, servitude or forced labour | We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, workers in our supply chain, members of the communities where we operate, or others who are affected by our activities. Our Human Rights Policy affirms this commitment. We expect our suppliers and business partners to share this commitment and to put in place policies and processes that support respect for human rights, as affirmed in our Expectations for Suppliers and Contractors. |
| Right to non discrimination in employment/ occupation | We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, workers in our supply chain, members of the communities where we operate, or others who are affected by our activities. We are committed to providing a workplace free of discrimination where all employees can fulfill their potential based on merit and ability. |
| Right to adequate standard of living | We strive to deal with everyone in a fair and open manner, and our employees strive to conform to the spirit and intent, as well as the technical requirements, of all contracts we enter into and all laws, regulations and rules that govern us. We support sustainable development, and we willingly accept our responsibility to continuously improve our production practices to the benefit of our shareholders, employees, local communities and society at large. We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, workers in our supply chain, members of the communities where we operate, or others who are affected by our activities. |
| • Teck’s Health and Safety Policy • Teck’s Human Rights Policy • Teck’s Inclusion and Diversity Policy • Teck’s Expectations for Suppliers and Contractors • Code of Sustainable Conduct • Teck’s Code of Ethics • Teck’s Expectations for Suppliers and Contractors • Our Approach to Health and Safety • Our Approach to Human Rights • Our Approach to Managing Sustainability in our Value Chain • Our Approach to Business Ethics |
| Right to Clean Water and Sanitation | We are committed to protecting water and the life it sustains by being an industry leader in water stewardship.  
We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, workers in our supply chain, members of the communities where we operate, or others who are affected by our activities. | • Teck’s Water Policy  
• Teck’s Human Rights Policy  
• Our Approach to Water Stewardship  
• Our Approach to Tailings Management  
• Our Approach to Human Rights |
| Right to Health | We will identify and manage occupational health and hygiene exposures for the protection of longer term health.  
We are committed to working with suppliers who establish, maintain and rigorously enforce practices that are protective of worker health and safety. Suppliers’ personnel should be adequately trained, prepared and competent to perform their duties safely.  
Actual and potential risks to worker health or safety should be identified, assessed and eliminated or managed throughout the activities involved in sourcing and supplying goods and the performance of services by suppliers. | • Teck’s Health and Safety Policy  
• Teck’s Expectations for Suppliers and Contractors  
• Our Approach to Health and Safety  
• Our Approach to Water Stewardship  
• Our Approach to Human Rights |
| Right to Land | We are committed to building respectful relationships through early, inclusive dialogue and collaborative processes.  
We provide the resources to build the capacity of both Indigenous Peoples and Teck for meaningful dialogue.  
We work to incorporate Indigenous Peoples’ perspectives and traditional knowledge into company decision making throughout the mining life cycle to enhance benefits and address impacts. | • Teck’s Indigenous Peoples Policy  
• Our Approach to Relationships with Indigenous Peoples  
• Our Approach to Relationships with Communities |
| Right to Self Determination | We provide the resources to build the capacity of both Indigenous Peoples and Teck for meaningful dialogue.  
We work to incorporating Indigenous Peoples’ perspectives and traditional knowledge into company decision making throughout the mining life cycle to enhance benefits and address impacts.  
We are committed to working to achieve the free, prior and informed consent of Indigenous Peoples when proposing new or substantially modified projects.  
We are committed to working with Indigenous Peoples to achieve self-defined community goals that provide lasting benefits. | • Teck’s Indigenous Peoples Policy’s Policy  
• Our Approach to Relationships with Indigenous Peoples  
• Our Approach to Relationships with Communities |
| Right to enjoy just and favorable conditions of Work | We are committed to conducting our business in an honest and ethical manner.  
We are committed to providing a workplace free of discrimination where all employees can fulfill their potential based on merit and ability.  
We are committed to upholding high moral and ethical principles and we specify the basic norms of behaviour for those conducting business on our behalf (e.g. contractors). | • Code of Sustainable Conduct  
• Teck’s Inclusion and Diversity Policy  
• Code of Sustainable Conduct  
• Our Approach to Managing Sustainability in our Value Chain |
| Right to take part in cultural life | We provide the resources to build the capacity of both Indigenous Peoples and Teck for meaningful dialogue.  
We work to integrate Indigenous Peoples’ perspectives and traditional knowledge into company decision making throughout the mining life cycle to enhance benefits and address impacts. | • Teck’s Indigenous Peoples Policy  
• Teck’s Health and Safety Policy  
• Our Approach to Health and Safety  
• Our Approach to Relationships with Indigenous Peoples |

1 The Universal Declaration of Human Rights (UDHR), International Covenant on Civil and Political Rights (ICCPR).  
2 International Covenant on Economic, Social and Cultural Rights (ICESCR).  
3 UDHR, ICCPR, ICESCR, ILO.  
4 UDHR, ICCPR, ICESCR.  
5 UDHR, ICCPR, ICESCR, International Labour Organization Core Conventions (ILO).  
6 UDHR, ICESCR.  
8 UDHR (privacy and property), ICCPR (no forced eviction), ICESCR (no forced eviction).  
9 UDHR, ICESCR.  
10 UDHR, ICESCR.
Specialist Advice, Memberships, Partnerships and External Commitments

We play an active role in working with our industry sector partners such as the Mining Association of Canada (MAC) and the International Council on Mining and Metals (ICMM) in identifying and sharing best practices in human rights. We are committed to respecting human rights defenders, and we do not condone any form of attack against them or anyone who opposes our activities. We expect our business partners to share this commitment and to implement practices that reflect a respect for these human rights.

We also work with established human rights specialist groups, such as Business for Social Responsibility and Shift, to evaluate our strategies and support improvement in human rights management.

Teck works with numerous local, national and international organizations and programs to support human rights:

- **International Council on Mining and Metals (ICMM):** A global industry association that represents leading international mining and metals companies who are required to implement the ICMM 10 Principles, including Principle 3 on respecting human rights.
- **Mining Association of Canada (MAC):** Promotes the development of Canada’s mining and mineral processing industry. MAC represents member companies on key related initiatives, such as verifying the requirements of the Voluntary Principles on Security and Human Rights.
- **United Nations Global Compact (UNGC):** Provides a framework for businesses committed to aligning their operations and strategies with 10 principles spanning human rights, labour, the environment and anti-corruption.
- **UN Guiding Principles on Business and Human Rights:** Teck’s Human Rights programming and reporting have adopted this framework.
- **Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises:** Includes voluntary principles and standards for responsible business conduct that address a variety of issues, including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition and taxation.

Embedding Human Rights

We conduct ongoing due diligence to identify, prevent, mitigate and remedy any adverse human rights impacts. This takes place through annual corporate human rights reviews to identify Teck’s most salient human rights issues, including direct impacts of HSEC risks, through operations-level human rights assessments taking place every two years, and through regular social risk assessments. Identified risks are integrated into management plans and activities as outlined in our SMART toolkit. Significant risks related to human rights are acted upon and responses, communicating how issues are being addressed, are tracked.

Direct impacts of HSEC risks, including human rights risks, are assessed at our operations through the mandatory use of our risk matrix consequence table. All our operations update their risk registers annually, including express consideration of impacts to communities and people. This consideration includes actual and perceived impacts, as well as duration and remediability.

Our Targets and Commitments

As a responsible company operating globally, we are committed to respecting and observing all human rights. We are committed to engaging with our communities of interest on our human rights impacts through our SMART Framework and other activities, and to reporting on our performance.

Our Sustainability Strategy guides our long-term approach to relationships with communities across the organization. In 2019, we conducted broad engagement with employees and external stakeholders to identify and prioritize global trends and issues and set a new sustainability strategy, including new goals related to communities.

For more information on our existing and new sustainability strategy goals, see the Sustainability Strategy section of our website.

The table below discusses human rights-related assurance processes at Teck. Following each of these types of assurance, applicable management teams use the results to inform future actions and Teck’s five-year planning process.

We report on our performance against these indicators and our progress towards our human rights management on an annual basis in our sustainability report.

### Human Rights-Related Assurance

<table>
<thead>
<tr>
<th>Type</th>
<th>Organization</th>
<th>Items Reviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>External</td>
<td>Mining Association of Canada: Towards Sustainable Mining assurance</td>
<td>• Community of interest (COI) identification</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Effective COI engagement and dialogue</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• COI response mechanism</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Reporting</td>
</tr>
<tr>
<td>External</td>
<td>International Council on Mining and Metals: Sustainability Report assurance</td>
<td>• Total number of significant disputes relating to land use and the customary rights of local communities and Indigenous Peoples</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Principle 3: Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities</td>
</tr>
</tbody>
</table>