Progress on Audit Recommendations as of Q1 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
Tailings	1. Experimental test fills planned, should be given high priority for completion. Two test fills are planned at the southern portion of the East levee where foundation conditions are considered tenuous. These test fills will provide important data to drive construction techniques (including RoR), consolidation rates, saturation levels and geogrid performance. Diligent efforts should be made by TRMP to preserve the operational integrity of each test pad, so data is reliable and useful for design, construction and operation of the levee system.	The two planned test fill pads located within the southern MPS area were completed, with results issued and analyzed in Q3 2025. The test fill program has provided and continues to provide empirical data to support refinement of construction techniques, including rate of rise considerations, consolidation behavior, saturation conditions, and geogrid performance. Test pad operational integrity continues to be maintained through diligent management efforts and ongoing geotechnical monitoring, supporting data reliability and applicability for ongoing design, construction, and operation of the levee system.	Recommendation Implemented
	2. The measurement of phreatic surface levels in the levee embankments through standpipe piezometers have in the past been problematic due to 1) the levee crest traffic, 2) differential settlement that have sheared off vibrating wire piezometers and 3) levee raises that makes it difficult to "work around" water level instrumentation at the surface. It is recommended that TRMP develop a plan to measure water levels through traditional piezometers or hybrid systems	PTFI has consulted with a third-party expert to refine its pore pressure monitoring to better inform groundwater levels and phreatic response to levee construction. As part of this effort, 17 vibrating wire piezometers have been installed within the levees, with installation of additional piezometers anticipated to be completed this year. To address past challenges associated with levee crest traffic, differential settlement, and the extension of instrumentation during levee raises, PTFI plans to prioritize design features that minimize surface exposure and interference, allowing instrumentation to be retained and extended as construction progresses.	Q3 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	which can provide accurate measurement of phreatic levels in the levee embankment. These data need to be feed into the geotechnical stability model for the ModADA. These piezometers will need to be carefully extended as further lifts are added to each levee to address freeboard requirements. Piezometer data collected should be correlated with foundation conditions and undisturbed, native groundwater levels to determine potential mounding conditions in the levee embankment and correlation of phreatic levels in the embankment in proximity to water adjacent or near the levee.	The refined monitoring and instrumentation installation strategy supports active embankment management by providing reliable pore pressure data that are integrated into geotechnical stability assessments and evaluated in relation to surrounding environmental and foundation conditions.	
	3. Foundation conditions to the south continue to be generally weaker owing to a number of factors. These southern areas contain peat lenses, which are influenced by tidal fluctuations, and will be highly sensitive to the RoR requirements due to inherently weak foundations. Geotechnical stability analyses suggest these sections are not liquefiable, but this largely depends on the soil parameters and assumptions used in the analyses. TRMP must continue to refine these data and adjust design parameters accordingly. It was apparent in the 2024-2025 Environmental Audit that this data collection and analysis is underway (see bullet below on test fill programs currently ongoing).	The two planned test fill pads located within the southern MPS area were completed, with results issued and analyzed in Q3 2025. The test fill program has provided and continues to provide empirical data to support refinement of construction techniques, including rate of rise considerations, consolidation behavior, saturation conditions, and geogrid performance. Additional geotechnical investigations are in progress, with results used to support continued refinement of geotechnical data and design considerations.	Q3 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	4. Consideration, evaluation and of the Ajkwa River remain very important to the overall performance of the ModADA. Detailed designs of the New West Levee (NWL) toe area will be required with subsequent lifts. Physical constraints of this area will become more challenging in the future as downstream expansion of the NWL is required.	Geotechnical investigations at NWL, including drilling, CPT, and MSW surveys were completed. Updated geotechnical models are estimated to be completed in Q2 2026. The results will be incorporated into future designs to support detailed NWL toe design for subsequent levee lifts, considering increasing physical constraints and future downstream expansion requirements.	Q2 2026
	5. TRMP should continue to strategically direct tailings materials into low areas of the ModADA with highest priority to infill and displace ponded water in contact with the levee embankment. This recommendation will result in improved tailings retention and levee embankment stability. (Reference Tailing Roadmap Section II – Handling of Material in ModADA, [5] The increase of tailings retention, [c] Filling of depressed areas.	Tailings placement will continue to be actively managed to prioritize the infilling of low areas to strategically displace ponded water within the ModADA. Excavation and maintenance of internal channels guide tailings into depressed areas and are complemented by spur dikes to redirect tailings flows away from levee embankments, resulting in optimized tailings retention and embankment stability.	Recommendation Implemented
	6. The continued placement, operation, and maintenance of spur dikes and/or geotubes to strategically force the tailings river away from the levee embankment is highly supported. The spur dikes can be unarmored (i.e. without rip-rap protection) with periodic inspection and repair, when scour or erosion might occur. The spur dikes serve two primary purposes. First, they force the river away from the levee embankment and second, they create lower	PTFI continues to construct spur dikes based on completed design and hydraulic modelling. The continued placement, operation, and maintenance of spur dikes are used to manage tailings flow within the ModADA by redirecting flows away from levee embankments, reducing scour potential, and improving conditions for sediment retention. Monitoring and periodic maintenance are conducted to ensure their continued effectiveness, including repair of localized erosion when necessary.	Recommendation Implemented

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	energy depositional environments immediately downstream of the spur dike structure. Use of Dolos (or other manufactured scour protection tools) in strategic areas versus managing scour through widened crest widths or placement of sacrificial spur dikes should also remain as alternative scour protection methodology. This will require a tradeoff evaluation around effectiveness, cost, and availability. (Reference Tailing Roadmap Section II – Handling of Material in ModADA, [5] The increase of tailings retention, [b] Spur dikes and groins).		
	7. The Ajkwa River Corridor remains an important element of the overall tailings management system. The corridor diverts the Ajkwa River from the ModADA (i.e. previously it was combined with the Otomona River) from the ModADA and provides a redundant level of protection to Timika through the New West Levee (NWL). Should a peak storm event exceed the design capacity of the ModADA, overflow would be captured in the corridor assuming the Ajkwa River watershed did not experience an identical peak storm event and was also in flood stage. While the NWL provides this additional protection to Timika, it also has technical issues that must be proactively addressed. Both the NWL and the Old West Levee	Geotechnical investigations at NWL, including drilling, CPT, and MSW surveys were completed. Updated geotechnical models are estimated to be completed in Q2 2026. The results will be incorporated into future designs to support detailed NWL toe design for subsequent levee lifts, considering increasing physical constraints and future downstream expansion requirements. Potential ARD generation within the double levee system continues to be monitored through visual inspections and surface water quality monitoring.	Q2 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	(OWL) have specific sections constructed on top of tailings deposited prior to the segregation of the Ajkwa and Otomona Rivers. These underlying tailings were deposited in a dynamic, braided river environment resulting in pockets of tailings sediments underexposed in the Ajkwa River floodplain. From a physical geotechnical perspective, these tailings are potentially liquefiable when saturated. Under this saturated condition, significant seismic loads could destabilize the NWL as well as the OWL. In some locations these old exposed tailings are generating a visible ARD signal; syntopic water sampling above and below these locations show no discernable impact to surface water quality. It is recommended that PTFI continue to evaluate the geotechnical stability of the NWL and address potential ARD generation.		
	8. With the completion of the Kwamki Lake discharge level lowering project at the end of Q4 2024, continued monitoring of the capture system's performance is essential to ensure that it functions as intended—specifically, as a hydraulic barrier to prevent the long-term spread of potential pollutants from ModADA to the city of Timika.	PTFI continues to monitor the capture system's performance, with monitoring results routinely evaluated to confirm the system performs as intended over the long term.	Recommendation Implemented

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	9. Due to the dynamic nature of the ModADA and need for a reliable OFB target, LiDAR surveys are currently being done annually. The results of the LiDAR surveys should be incorporated into the OFB calculations on a regular basis and also be used to provide a database to update the Failure Mode and Effects Analysis. It should be PTFI's goal to have accurate survey data, at a minimum annually, and ideally on a 6-month basis (e.g., annual LiDAR with semi-annual infill surveys).	PTFI conducts annual LiDAR surveys to maintain accurate elevation data for Operational Freeboard (OFB) calculations, which is essential given the dynamic nature of the ModADA. LiDAR results are routinely integrated into OFB assessments and used to update the Failure Modes and Effects Analysis (FMEA), which is applied as a risk-based tool to prioritize levee-raising plans. Between annual LiDAR surveys, TRMP uses complementary monitoring approaches, including routine levee freeboard surveys and ongoing InSAR monitoring, to support ongoing OFB evaluation and inform the FMEA.	Recommendation Implemented
	10. Maintain the current levee monitoring program and frequencies (CQA, instrumentation, LIDAR, observations, seepage observation). TRMP continues to make great strides in this area over the years and the monitoring program should continue to be institutionalized and embedded in TRMP SOPs. Focus should be concentrated on the southern extensions of both the East and West levee sections. It is realistic to assume that in the south extension area, the acceptable RoR required to avoid deformation and differential settlement may not allow the placement of adequate levee fill material to meet freeboard design parameters. The test fill data will help assess this probability. Alternative designs or operating procedures are required to address specific situations where deformation can be managed	PTFI will continue to maintain the established levee monitoring program, including CQA, instrumentation, LiDAR, visual inspections, and seepage monitoring, and ensure these practices remain embedded within TRMP SOPs. Monitoring priority remains focused on the southern extensions of the East and West levees, where deformation and differential settlement may constrain achievable rates of rise and freeboard. Test fill results from the southern MPS area are used to assess these conditions, and outcomes will be incorporated into levee construction SOPs where appropriate.	Q3 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	sufficiently to preserve adequate freeboard.		
	11. The fiber optics program was a wise investment by PTFI to monitor geotechnical performance of the combined levee system. The system will require continuous service to maintain this tool's reliability and accuracy.	PTFI will continue operating the fiber-optic monitoring system to support reliable levee performance monitoring. The fiber-optic system is supported by routine maintenance, servicing, and vendor verification to maintain system reliability and accuracy.	Recommendation Implemented
	12. Drone technology should be exercised to its fullest to maintain real time operational inspection, reduce travel risk and costs and provide real time corroboration of instrumentation signals that may signal anomalous conditions.	PTFI uses drone technology across the TRMP working area to support real-time operational inspections, reduce travel-related risks, and enable timely identification and evaluation of potential anomalous conditions. Drone monitoring is used in conjunction with other technologies to support informed operational decision-making.	Recommendation Implemented
	13. Data collection by TRMP remains impressive and growing. The quality and reliability of the data is also improving. TRMP should continue to evaluate methods, software and approaches to interrogate data to transition from a lagging indicator (i.e. what has happened in the past) to a leading, predictive indicator of what is likely to happen in future.	To further enhance TRMP data collection and utilization, PTFI has implemented a digitization program through an enterprise environmental data management platform that centralizes laboratory, field, and monitoring data within a validated database. This approach enables improved data interrogation, automated reporting, and trend analysis, supporting the transition from lagging indicators toward leading and predictive indicators. Based on the implementation of this program and the enhanced capability for data-driven and predictive analysis, this recommendation is considered closed.	Recommendation Implemented

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
		14. The release of Version 6 of the TRMP Emergency Procedures Manual (TEPM) since 2022 shows PTFI's commitment to continuous improvement in the daily management of the ModADA and specifically protocols that address emergency response actions. These periodic updates are a necessary requirement in the future.	PTFI routinely reviews and updates the TRMP Emergency Procedures Manual (TEPM) to maintain effective emergency response protocols within the ModADA and the latest version was approved in March 2025. Drills and exercises are used to validate the TEPM and support its continuous improvement over time.	Recommendation Implemented
Grasberg Open Pit Closure	Wanagon Overburden Stockpile Geotechnical Management and Water Management	1. PTFI should confirm that all closure activities could be realistically supplied via the aerial tram alone and determine the limitations that will be imposed on highland reclamation activities by the early loss of HEAT road. It is further recommended that PTFI develop a detailed mitigation plan to address a situation where subsidence impacts are realized before Wanagon closure is completed. This plan could include construction of an alternate access road, stockpiling of heavy equipment and supplies or other mitigation strategies to ensure the mine closure schedule would not be adversely impacted by early loss of the HEAT road.	PTFI has evaluated the capability of the aerial tram system as the primary logistics and personnel transport route and identified the key limitations that may affect closure and reclamation activities in the highlands. Based on this evaluation, PTFI is developing a mitigation strategy to ensure that mine closure and reclamation activities can continue safely and effectively should access via the Heavy Equipment Access Trail (HEAT) road be lost earlier than anticipated. This strategy includes evaluating alternative access solutions and contingency measures such as strategic stockpiling of critical equipment and materials. These measures are being coordinated through PTFI's internal Mine Closure governance process to ensure that the planned Wanagon closure schedule is not adversely impacted by subsidence-related access constraints.	Q1 2027
		2. PTFI should develop contingency plan if the KDL is impacted by subsidence.	PTFI is assessing subsidence scenarios that could affect the functionality of the KDL Tunnel and is identifying appropriate contingency measures to ensure drainage performance can be maintained should impacts be realized. These measures may include developing monitoring-based triggers, identifying opportunities for flow diversion and constructing alternative	Q1 2027

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
			routes to ensure drainage continuity. Subsidence will continue to be closely monitored to inform the best type of contingency measures. This work is being integrated into PTFI's broader subsidence and mine closure governance processes to ensure that environmental protection and operational resilience are maintained as subsidence conditions evolve.	
		3. The placement of the additional planned piezometers and maintenance of all installed piezometers in the Wanagon OBS should continue to remain a high priority. Any unusual increase (or decrease) in phreatic levels should be immediately reported to the design team.	PTFI continues to prioritize the installation and maintenance of piezometers in the Wanagon OBS, including the placement of additional instruments as planned. Piezometer data are routinely reviewed to identify any unusual changes in phreatic levels, and established internal procedures ensure that such anomalies are promptly communicated to the relevant design and technical teams. These activities form part of PTFI's ongoing geotechnical monitoring and governance framework to support safe operations and effective closure planning in subsidence-affected areas.	Q2 2027
		4. PTFI should consider alternative methods to estimate discharge from the toe of the LWOBS (i.e. surface and groundwater). This data would be extremely useful to complete a system wide water balance for the Wanagon OBS.	PTFI is evaluating alternative surface and groundwater-based methods to estimate discharge in this area, recognizing the site-specific geological and hydraulic conditions that may limit the effectiveness of conventional monitoring installations. Hydraulic modeling is being applied to support evaluation of discharge estimation methods. Outcomes will be integrated into PTFI's ongoing water balance framework for the Wanagon OBS, supporting informed water management and closure planning.	Q2 2027

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
Underground Mining Operation	1. The progression of subsidence—currently occurring in the Grasberg and DOM areas—is closely linked to surface access availability, infrastructure stability, and mine water management. Therefore, any updates or changes to existing subsidence predictions must be continuously communicated to the relevant divisions, and mitigation efforts should be prepared as early as possible. This is essential to ensure the availability of access and the stability of critical infrastructure required for the successful completion of the Grasberg post-mining program as well as the production-operation.	PTFI routinely updates subsidence predictions as part of its geotechnical risk management process and utilizes these updates as an early-warning system to support operational planning and preventive actions. Mitigation measures are prepared and implemented proactively, including adjustments to access, protection of critical infrastructure, and implementation of preventive controls, as required.	Q4 2026
	2. Water balance analysis has been conducted for both open-pit and underground mines. The integration of water quality (geochemical load) analysis should be initiated for the underground mining operation, as the post-mining phase requires a sustainable and stable water quantity and quality, particularly in relation to subsidence progression at both GBC and DMLZ.	PTFI has implemented water balance analysis for its mining operations to support effective water management throughout the operational and post-mining phases. Recognizing the importance of maintaining both water quantity and quality, PTFI is strengthening its approach by progressively integrating water quality considerations into underground water balance evaluations. PTFI will enhance the assessment of potential geochemical interactions associated with underground mine expansion and subsidence progression, with the objective of supporting sustainable water management over the long-term. The outcomes of ongoing technical evaluations will be used to refine operational scenarios, water utilization strategies, and management controls, while maintaining alignment with applicable technical standards and regulatory requirements.	Q4 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	3. Mine water management, for both surface and underground operations, has been implemented with a focus on ensuring a reliable water supply for mill operations via pumping at LPS, while also minimizing environmental reduce impact. it is there for PTFI should maintain : ▪ Efforts to separate water and solid particles as close as possible to the water-slurry sources underground need to be increased (e.g. increasing pumping capacity to the plant, series of mud pond/trap and UG ditch) to sediment load need to be continued. ▪ Increase the frequency of sediments removal from traps to optimize design capacity need to be continued.	Ongoing hydrology assessments are being conducted to better understand flow characteristics and suspended solids behavior, including sediment load projections and wastewater performance trends, with outcomes used to further refine pumping strategies and sediment management practices. PTFI will continue to maximize and expand water diversion and pumping to the mill processing facilities. To further improve sediment management performance, PTFI is enhancing operational controls by ensuring sediment trap maintenance and clean out activities are undertaken regularly and by evaluating additional sediment control opportunities (improved drainage systems, additional mud traps, control structures, etc.).	Q4 2026
	4. With the issuance of the technical approval for wastewater discharge—and the anticipated operational approval process in the near future—a thorough and continuous evaluation of wastewater management performance is crucial to ensure compliance with the upcoming effluent water quality standards based on technical approval. Any potential risks of non-compliance, such as increased load from KL Mine operations or the cessation of pumping activities in the Grasberg Pit Area, must be promptly communicated to all relevant divisions and proactively addressed to prevent any violations once the technical approval is officially	Ongoing hydrology assessments are being conducted to better understand flow characteristics and suspended solids behavior, including sediment load projections and wastewater performance trends, with outcomes used to further refine pumping strategies and sediment management practices. These efforts are supported by routine monitoring and trigger-based review and response mechanisms that allow for timely adjustment or refinement, as appropriate, in relation to applicable technical approvals. To support continuous evaluation and follow-up, PTFI is in the process of strengthening its internal reporting to more effectively communicate trends and improve cross-functional collaboration to inform management decisions.	Q4 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	enforced.		
Mill and Concentrator	1. Currently, MP74 Stockpile maximum capacity is 1 million ton (250,000 tonnes at MLA Stockpile and 750,000 tonnes at Amole Stockpile) to support overall concentrate mill process, including oreflow process. The implementation plan to integrate the C1-C2 and C3-C4 lines could provide an opportunity to regulate the CNV/MPA ratio in ore processing, helping to reduce the issue of deficit CNV/MPA ratio in ModADA tailings management.	The Concentrating Division continues to evaluate operational scenarios for integrating the C1–C2 and C3–C4 processing lines to enhance flexibility in ore blending and further optimize the CNV/MPA ratio prior to tailings discharge. This assessment includes characterization of ore feed from MLA and Amole stockpiles, sulfide trends, and potential blending strategies aligned with the anticipated increase in high-sulfide ore from future mining zones. The evaluation will be coordinated with the Tailings and River Management Project (TRMP) to ensure alignment with downstream requirements. When the evaluation is complete, the findings will be incorporated into operational planning.	Q3 2026
	2. Following the commissioning of SAG#3 and the Kasuang CuCL, which began operations in December 2023 and October 2024 respectively, there is a potential for a reduction in tailings particle size. This condition may increase pressure on Total Suspended Solids (TSS) levels at the compliance point in ModADA. Therefore, continuous review of the impact of finer tailings particle size on tailings management at ModADA—particularly regarding TSS values at the compliance point—must be maintained.	The Concentrating Division, in coordination with TRMP continues to evaluate the relationship between tailings particle size distribution and TSS levels at the compliance points leaving the ModADA. This includes routine PSD monitoring, sediment transport modelling updates, and operational adjustments within ModADA to maintain TSS performance within Roadmap targets. Findings will be incorporated into quarterly technical reviews with TRMP.	Q1 2027

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
Waste Management	Hazardous Waste	1. If the used dry battery is generated in PTFI in the near future, it is recommended to revise the SOP for handling of used dry batteries that contain lithium. The revised SOP should encompass correct labelling, storage and disposal to an authorized third-party including reassessment of the determined symbol where more than one symbol is used for one type of hazardous waste. PTFI also will determine how to influence Sandvik for management of storage and disposal in the future of these used dry batteries that contain lithium.	PTFI is reviewing and updating its internal procedures to strengthen requirements for the handling, labeling, and temporary storage of used batteries in work areas, taking into account the specific characteristics of lithium-containing batteries. These actions are intended to ensure batteries are clearly identified and managed appropriately during on-site storage. PTFI has not disposed of any waste lithium batteries; however, as these batteries are depleted, off-site disposal of used lithium batteries will be managed by authorized third parties with the appropriate technical capability and regulatory permits. PTFI is engaging third-party service providers who are permitted and equipped to manage and dispose of used lithium-containing batteries when these wastes are generated. PTFI has confirmed the contract stipulation and the commitments of a battery-operated equipment supplier, whereas the supplier assumes responsibility for the handling and disposal of their used batteries. PTFI will verify that management and disposal of these wastes are in line with applicable procedures and regulations.	Q3 2026
		2. It is recommended to include future potential generated wastes e.g. used dry batteries and any anticipated future wastes will require inclusion in any upcoming waste stream audit.	PTFI regularly assesses changes in activities which potentially result in new hazardous waste streams. These results inform waste stream audits ensuring that waste handling capacity, storage arrangements, third-party service providers, and associated costs are appropriately planned and aligned with regulatory requirements. Waste stream audits occur when significant changes in operational activities are identified.	Q4 2026
		3. PTFI needs to revisit the current MoC process specifically MoC review, to check the adequacy of the filled completed MoC checklist phase 1.	PTFI is strengthening its Management of Change (MoC) review process, particularly at the early assessment stage, to ensure that potential impacts are adequately evaluated, and appropriate risk controls are identified from the outset. An internal MoC Task Force is coordinating input from Environmental, Safety and other	Q3 2027

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
			divisions to enhance the robustness of the program and has already included a review and socialization of the Phase 1 checklist. As a result of the Task Force, PTFI has released interoffice-memorandums and conducted awareness and user training sessions.	
		4. It is recommended to develop a schedule for spill emergency drills and undertake this drill either integrated with other emergency drills, e.g. fire or seismic or single scenario for spill emergency drill.	PTFI has initiated incorporation of spill emergency scenarios into its existing emergency drills and work is ongoing to refine spill response preparedness programs. Outcomes of these drills will be used to identify opportunities for continuous improvement in emergency response procedures and practices.	Q4 2026
		5. To provide emergency spill kit in relevant areas where the spill incident may occur and consistently conduct inspections for the spill kit equipment to ensure this equipment is ready to use.	PTFI has strengthened its spill preparedness practices by identifying all areas where spills may occur and providing the necessary spill kits. Regular inspections of these spill kits are scheduled and conducted by the area owners to ensure that appropriate spill response equipment is available. These measures are intended to ensure that spill kits are available and remain complete, functional, and ready for use, in the event of an environmental emergency.	Q3 2026
		6. To include training on relevant SOPs or WIs, (e.g. SOPs / WIs on spill emergency response, SOPs / WIs LTP operation) for persons whose tasks are significant to the environment aside from other relevant trainings as per specific aspects.	PTFI conducts regular targeted knowledge-sharing sessions on relevant environmental procedures and work instructions, including spill emergency response. This program will continue to be strengthened to ensure all personnel involved in environmental-critical activities are identified, trained and refresher training is provided. In addition, the environmental department coordinates with internal safety and operational teams regarding appropriate training and awareness programs in place, as well as follow-up communication to reinforce correct operational practices. These actions are intended to improve	Q3 2026

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
			consistency, competency, and compliance in day-to-day environmental operations.	
		7. PTFI is recommended to socialize best practices with respect to waste management with TNI personnel during onboarding which includes their transportation of waste to a centralized PTFI location for disposal.	TNI is not part of PTFI's workforce, contractor hierarchy, governance bodies or organizational structure. However, PTFI will socialize best practices with respect to waste management with TNI personnel during onboarding which includes locations TNI can transport their waste for proper management.	Q4 2026
		8. Review the effectiveness of existing method on environmental awareness training to include training or briefing at working area during safety talks or environmental inspections. This approach will increase the knowledge and understanding of participants compared to conventional method in classroom (online or offline).	PTFI will continue to enhance the environmental awareness programs by integrating field-based training and briefings into routine safety talks, environmental inspections, and operational observations that occur with area owners. These activities include targeted sharing sessions and the use of facility-specific environmental information to reinforce roles and responsibilities related to environmental protection. This combined approach is expected to improve communication and awareness of environmental aspects which will further embed environmental awareness into daily operations across facilities.	Q4 2026
		9. Relevant waste generator needs to reassess the determined symbol where more than one symbols are used for one type of hazardous waste. This reassessment will refer to SDS or actual physical waste that being transferred and stored in the WTP.	PTFI maintains an SOP for hazardous waste management, which includes identification and labelling procedures. PTFI will review and update this SOP to enhance clarity on appropriate hazard symbols, supporting consistent application during handling and storage activities. Labelling will be verified during routine inspections to confirm proper hazardous waste management and regulatory compliance.	Q3 2026

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
	Non-Hazardous Waste	1. Optimization of wastewater treatment by further evaluation of MP38 STP, particularly regarding flow rate stability and treatment efficiency.	PTFI will perform a process review of MP38 STP (hydraulic equalization, aeration capacity, sludge age/MLSS control, return rates) to identify opportunities for improvements to wastewater treatment processes. Adjustments will be made where suitable.	Q1 2027
		2. Solid waste management at the MP73 landfill: ▪ Long-term planning for landfill capacity, given that several landfill facilities are nearing full capacity. ▪ Strengthening 3R programs to minimize the volume of waste sent to landfills. ▪ Continued monitoring to identify the potential environmental contamination.	PTFI will update the MP73 landfill capacity plan (cell life projections) and investigate additional opportunities for improvements to landfill management. This will include further evaluation of a new landfill at MP71. PTFI will look for further opportunities for the 3R programs with the intention to reduce landfill inflow. Groundwater monitoring continues downgradient of the MP73 Landfill.	Q3 2027
		3. Leachate treatment; ▪ Further assessment of the effectiveness of leachate treatment at MP38, especially in reducing BOD levels. ▪ Implementing additional strategies, such as optimized aeration or advanced biological treatment methods, to enhance pollutant removal efficiency.	PTFI has an approved budget for a redesign of the Leachate Treatment Plant (LTP) at MP38 which will improve the system and increase capacity. We have selected a contractor and expect work to commence this year.	Q1 2027
Climate Change Related Issues	Air Quality and GHG	1. Continue the efforts to reduce emissions and improve emission quality from heavy equipment by testing several technologies, including the use of battery-powered heavy equipment and additives that can minimize the formation of CO gas.	PTFI continues to identify and implement initiatives to reduce greenhouse gas emissions from its operations. PTFI has already achieved a significant reduction in GHG emission intensity through a range of decarbonization programs, including the operation of underground electric trains, the utilization of a 129 MW Dual Fuel Power Plant, equipment optimization at the concentrating facilities, and broader energy efficiency programs supported by mandatory energy audits. PTFI is also currently trialing electric loaders in the underground operations.	Recommendation Implemented

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
			PTFI has an ongoing commitment to improve emission performance and will continue to evaluate lower-emission technologies as part of its long-term climate strategy.	
		2. While the current GHG inventory focuses on the main GHG emission sources, i.e. stationary and mobile combustion sources, a comprehensive GHG emission baseline requires the inclusion of potentially overlooked GHG emissions. These sources are recommended to be included in the upcoming GHG inventory to the extent feasible and economically practical.	PTFI has conducted its annual GHG inventory since 2007, with results reported and assured annually as part of FCX's GHG Inventory. GHG inventory practices are implemented in alignment with the GHG Protocol, with information on FCX's GHG emissions assurance provided in the FCX Annual Report on Sustainability, available at fcx.com/sustainability.	Q2 2027
Reclamation and Biodiversity	Biodiversity and Natural Ecosystems	1. In several areas at Grasberg where reclamation was initially conducted, vegetation has failed to establish on eroded slopes. Enhancement planting is recommended to ensure adequate vegetation cover on these eroded slopes to improve soil stability and to control erosion.	PTFI will continue to implement enhancement plantings in previously reclaimed slopes using locally sourced *Deschampsia klossii* and targeted hydroseeding, combined with Bactosoil application where appropriate and based on our enhancement procedures. Priority slopes are selected based on field inspections and erosion risk.	Recommendation Implemented
		2. As follow-up to the 2021-2022 External Environmental Audit recommendation to document post-mining reclamation success, PTFI is recommended to include soil fauna monitoring as part of the ongoing biodiversity monitoring program at Grasberg to demonstrate ecological processes of nutrient cycling and energy flow at post-mining reclamation sites.	PTFI has established a cooperation agreement with UGM to study success criteria for reclamation programs, which includes biophysical data collection and data analysis. As part of this effort, parameters demonstrating ecological function, such as nutrient cycling and energy flow, will be evaluated. Soil fauna will be included where applicable. Field data collection and the associated site visit are underway, with the final report anticipated later this year.	Q3 2026

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
		3. One of the objectives of Taman Kehati is to preserve high conservation values and Papuan biodiversity. It is recommended that indigenous flora species that are threatened or endangered – including those which have established on the tailings deposition at the MP21 research center - should be assessed for planting in this area once there is no risk of further deposition.	Since 2023, PTFI has been progressively assessing and implementing the planting of indigenous flora species, including those with conservation significance, such as threatened or endangered, within the Upper Estuary Taman Kehati area as part of our approved PERTEK. Planting performance is routinely evaluated, and adaptive management is applied to account for site-specific conditions such as prolonged inundation and tidal influence. As site conditions continue to stabilize, the outcomes of this monitoring will inform future decisions regarding the suitability and timing of additional threatened or endangered indigenous flora species to further strengthen the conservation value of Taman Kehati.	Q3 2026
		4. A limited number of SOPs and MPs and reporting of the actions in these plans are either not consistently applied on-the-ground, accurately reflect permits and environmental approvals, or could be updated to include best practices. It is recommended to revise the SOPs and MPs listed in Table 4-8.	PTFI is undertaking a targeted review and update of SOPs and MPs, to ensure consistency with approved Technical Approvals, AMDAL commitments, and evolving best practices. Where needed, updates have been and will be made to strengthen content, clarify monitoring locations and frequencies, and ensure that implementation and reporting accurately reflect current field conditions. This process supports continuous improvement and helps ensure that environmental management practices remain robust, compliant, and aligned with regulatory and scientific expectations.	Q4 2026
		5. Monitoring mangrove survival rate is important to assess planting techniques and seedling success. It is recommended to review survival rate reporting procedures with the environmental team to ensure reporting aligns with MP-EM-RB-	PTFI is reviewing mangrove survival rate reporting procedures to ensure full alignment with the environmental monitoring program. This includes confirming that monitoring frequency, parameters, and reporting formats are applied consistently and reflect the current version of the monitoring program.	Q3 2026

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
		21 updated approved in December 2024.	These actions support data quality, traceability, and regulatory compliance, and ensure that mangrove monitoring results can be reliably used for performance evaluation and reporting.	
		6. Habitats are changing from aquatic to terrestrial ecosystems in estuary. It is recommended that monitoring stations that were initial established for aquatic habitat – in particular EM270 – should be consulted with the MoE regarding the possibility of the relocation due to the expansion of mangrove ecosystems from the tailings deposition and planting.	As a result of the expansion of mangrove ecosystems from the tailings deposition and planting PTFI will consult with the Ministry of Environment on the suitability and, if appropriate, the relocation of aquatic monitoring stations that have transitioned to mangrove habitats (e.g., EM270). Proposed changes will include scientific justification, alternative locations, and continuity of long-term data series.	Q4 2026
		7. Monitoring in the MP40 to MP66 area (red zone) is required to meet environmental commitments and can provide valuable data on terrestrial ecosystems including flora and fauna diversity. However, access and security challenges restrict monitoring in this area. To overcome these challenges, it is recommended that alternative monitoring techniques such as remote sensing analysis be assessed for applicability.	PTFI is working with qualified third-party experts to evaluate alternative monitoring approaches that are safe and feasible, including the potential use of remote sensing analysis and other technology-based methods. This process aims to identify appropriate monitoring areas and methodologies that can provide reliable ecological information while maintaining personnel safety.	Q4 2026
		8. The current efforts in biodiversity conservation, outreach, and research are commendable. There is an opportunity to strengthen awareness of the Natural Succession Discovery Park (NSDP), especially within the scientific	PTFI will continue to collaborate with Indonesian scientific institutions to support information sharing, collaborative research, and long-term preservation of plant specimens. This collaboration strengthens research networks and reinforces the role of NSDP as a living laboratory for scientific learning.	Q4 2026

Strategic Environmental Issues		Recommendations (Summary)	PTFI Response	Status/Timing
		community. It is recommended that PTFI assess opportunities to share it herbarium collection with reputable Indonesian institutions to enhance scientific knowledge, foster collaborative research, and ensure the preservation of valuable plant specimens through distributed storage.		
		9. PTFI has a strong commitment to biodiversity management and monitoring; as evidenced by the workshop held in December 2022 to develop an updated Biodiversity Action Plan based on expert advice. It is recommended that PTFI implement the Biodiversity Action Plan as it offers a clear five-year framework to strengthen monitoring, build capacity, and support scientific output.	PTFI is committed to implementing the BAP as a structured five-year roadmap to strengthen biodiversity monitoring, enhance internal and external capacity, and support scientific outcomes. To support effective implementation, PTFI is undertaking a review of current progress and alignment of ongoing activities with the BAP framework. This process will help ensure that implementation priorities consider timing and implementation context, while supporting systematic tracking and communication of progress.	Q4 2026
		10. PTFI biodiversity monitoring is extensive, covering multiple ecosystems and taxa. However, challenges exist in timely species identification and data curation. To improve the reliability of data reporting, it is recommended that effective training and supervision in data collection best practices, species identification, and analysis be conducted with persons involved in biodiversity monitoring.	PTFI has conducted and will continue to conduct targeted training for personnel involved in biodiversity monitoring. Follow-up assessments will also occur to evaluate the effectiveness of these efforts. This assessment will support the refinement of training programs, quality assurance and quality control processes, and field supervision practices to further enhance the consistency, accuracy, and reliability of biodiversity data over time.	Q4 2026

Strategic Environmental Issues	Recommendations (Summary)	PTFI Response	Status/Timing
	11. As follow-up to the 2021-2022 External Environmental Audit recommendation on data analysis, a synthesis of existing reclamation monitoring data should be conducted to better understand the biological and physical phenomena of reclamation and adaptively improve reclamation practices.	The PTFI Environmental Division has implemented a method of collecting field data to capture more granular reclamation and biodiversity information from the highlands area. The method captures additional biological and physical data that could improve our reclamation plantings and management decisions on reclamation planning. A similar method of collecting field data is being implemented in the lowlands area. PTFI established a cooperation agreement with the Gadjah Mada University (UGM) to study success criteria for reclamation programs which includes biophysical data collection and data analysis. Field data collection and the associated site visit are underway, with the final report anticipated later this year.	Q3 2026
Regulatory Aspects	1. PTFI can develop an accessible regulatory information system as a reference for division/function within PTFI.	PTFI is evaluating opportunities to enhance communication of regulatory updates across operational areas, including potential enhancements to its internal regulatory information reference system.	Q4 2026
	2. To enhance reporting efficiency, an integrated reporting system should be developed to ensure that compliance data and activities are well-documented and comprehensively reflect the compliance measures undertaken.	PTFI is currently strengthening its internal reporting system by improving data consistency, traceability, document management and alignment with current regulatory and permitting requirements through an enterprise environmental data management platform that centralizes laboratory, field, and monitoring data within a validated database. This system will utilize technology and processes such as dashboards to communicate trends.	Q3 2026
	3. PTFI must update its environmental management activities and implementation SOPs in accordance with the new regulations and permits.	PTFI will review and update relevant environmental management activities and associated SOPs to reflect new regulations and permits to ensure the implementation and reporting remain consistent with the latest obligations.	Q1 2027