



The Copper Mark Assurance Process

February 2020

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1 Introduction

The Copper Mark is a credible assurance framework to demonstrate the copper industry's responsible production practices and industry contribution to the United Nations SDGs. With the Copper Mark, we can improve the lives of our colleagues and neighbors, strengthen the communities in which we do business, and increase the value we deliver to our customers and their consumers.

The Copper Mark:

- has been designed specifically for, and with the participation of, the copper industry, around issues that matter most to the industry and its stakeholders;
- uses a business-to-business tool and platform that is used and widely recognized by major automotive and electronics OEMs, smelters and refiners;
- incorporates, recognizes and has a specially designed '[equivalence](#)' system for well-known management system standards used by the copper industry;
- monitors continuous improvement;
- is comprehensive in its approach to sustainability, taking its inspiration from the UN Sustainable Development Goals (SDGs); and,
- includes credible assurance of responsible practices at copper production [sites](#), including mines, smelters, and refineries.¹

The Copper Mark claims and logos can be used by assured sites to convey a Copper Producer's commitment to meet industry sustainability standards in their production practices. For further information please refer to The Copper Mark Claims Guide.

This document outlines the assurance process for the Copper Mark – the Copper Mark [Assurance Process](#) – to be applied at the sites of copper mines, smelters and refineries. The Copper Mark Assurance Process assesses responsible production as measured by the [Copper Mark Criteria](#) that cover 32 issue areas. Currently, the Copper Mark Assurance Process does not provide for [chain of custody](#), nor does it include the assurance process for the Copper Mark Due Diligence Standard (see the Copper Mark Due Diligence Standard document for further information).

Assurance is the process by which The Copper Mark Company ensures that the claims made by participants are credible and trustworthy. The Copper Mark Company seeks to

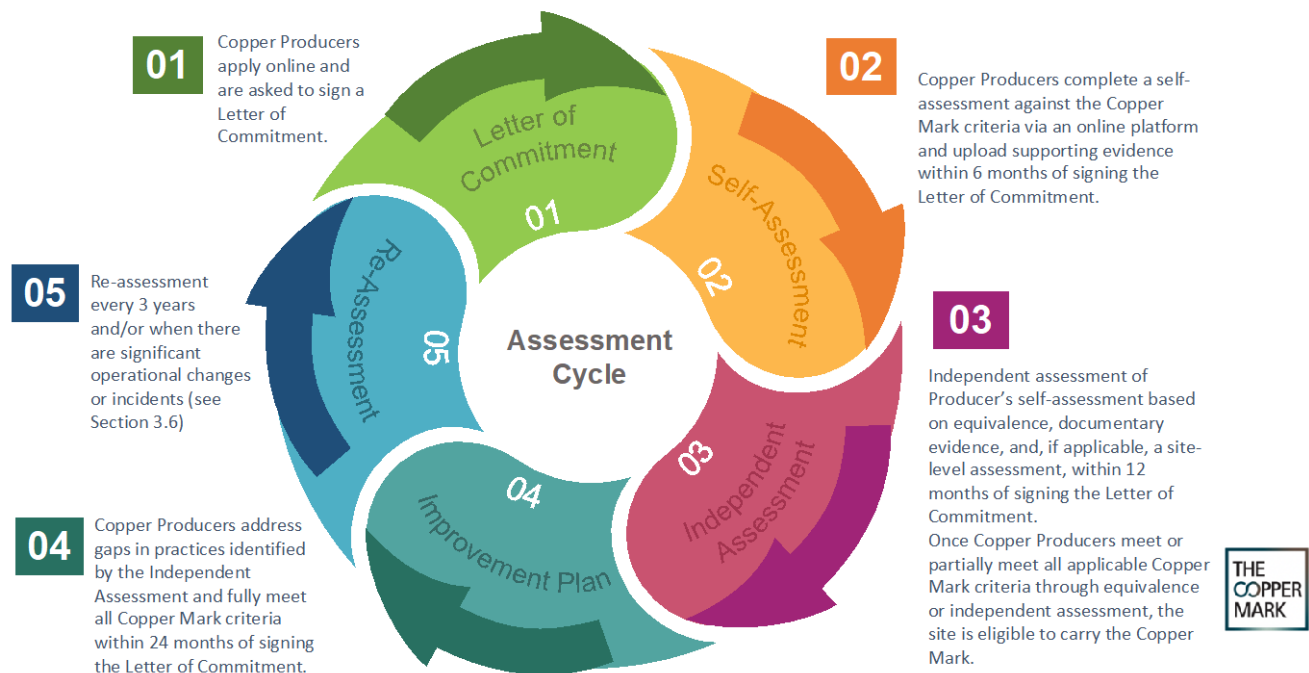
¹ In the future, copper fabricators may be able to participate in the Copper Mark Assurance Process.

implement an assurance process that is recognized by stakeholders as credible, incorporates best international practice, and aligns with the following five principles:

1. **Pragmatic**
The assurance process is achievable, implementable and fit-for-purpose. It enables participants to use documented evidence as a significant contribution to the assessment.
2. **Inclusive**
The assurance process is accessible to all Copper Producers, smelters and refiners at whatever stage along their journey to sustainability and to all sizes of operations.
3. **Recognition**
The assurance process recognizes existing standards systems, reporting frameworks, certifications or externally assured management in order to avoid redundancy and to promote the use of these initiatives.
4. **Progressive**
The assurance process acknowledges that a period of implementation is required to achieve full conformance with the Copper Mark Criteria for responsible production (the Copper Mark Criteria).
5. **Continuous improvement**
The Copper Mark Company monitors overall progress in improvements against the Copper Mark Criteria through annually reviewing implementation of improvement actions.

The Copper Mark Assurance Process comprises five steps, illustrated in Figure 1.

Figure 1: Overview of the Copper Mark Assurance Process Cycle



2 Participating Entities

There are four principal entities that participate in the Copper Mark Assurance Process, each of which have particular roles and responsibilities:

- A. Copper Producers.
- B. Copper Mark Assessors.
- C. Independent Reviewers.
- D. The Copper Mark Company.

A. **Copper Producers** are entities with an operating mining site and/or a facility with solvent extraction and electrowinning (SX/EW), smelting or refining operations that are located in one geographic area and are operated under one management system. To be eligible to participate in the Copper Mark, producers must produce copper or copper products. Such entities might produce other metals as well as copper. Included in the copper supply chain are multi-metal producers that produce gold, nickel, lead, molybdenum and zinc, alongside copper.

Copper Producers responsibilities when participating in the Copper Mark Assurance Process include:

- Signing a Letter of Commitment to complete the 5-steps of the Assurance Process;
- Nominating and providing an appropriate level of support and resources to a contact person who will coordinate with the Copper Mark;
- Committing the requisite resources to meet the Copper Mark Criteria;
- Maintaining records related to their participation in the Copper Mark Assurance Process;
- Completing self-assessment surveys, accepting independent reviews on this information and receiving site-assessment visits at their operating sites; and,
- Making available information on their production practices necessary to determine their conformance with the Copper Mark Criteria.

B. **Copper Mark Assessors** are independent parties approved by the Copper Mark to carry out assessment activities. Assessors provide external validity to the Copper Mark's Assurance Process through visits to Copper Producers' sites to assess their production practices against the Copper Mark Criteria, the scope of which is set by the Copper Mark based on a recommendation made by Independent Reviewers (see below). The Copper Mark selects assessors using criteria listed in Section 3.

Copper Mark Assessors have the following responsibilities:

- To complete the Copper Mark’s approval process for Assessors;
- To participate in any required training;
- To conduct site assessment visits and prepare assessment reports;
- To provide feedback and recommendations on Copper Producer Improvement Plans, three-monthly reports and findings from site-visits.

C. **Independent Reviewers** are independent parties appointed by the Copper Mark to review the self-assessments of Copper Producers. Reviewers check the completion status of self-assessments and of supporting documentary evidence submitted to the Copper Mark. They verify the legitimacy of submissions for equivalent certifications or standards schemes recognized by the Copper Mark. Reviewers can also be Copper Mark Assessors if they meet the requirements set out in Section 3.

Independent Reviewers have the following responsibilities:

- To participate in any required training;
- To complete desk reviews on Copper Producer self-assessments;
- To verify the legitimacy of submissions for equivalent certifications or standards schemes recognized by the Copper Mark;
- To make recommendations on the need for and the scope and focus of site assessments.

D. **The Copper Mark Company** is responsible for the planning, execution and reporting of the Copper Mark Assurance Process. It oversees the delivery of assessment activities, including the approval of Copper Mark Assessors and Independent Reviewers, reporting of assessment results and monitoring claims and logo use by assured Copper Producers. It is accountable for all compliance and decisions related to assured Copper Producers.

The Copper Mark Company has the following responsibilities for the implementation of the Assurance Process:

- To approve Copper Mark Assessors;
- To approve Independent Reviewers;
- To confirm and to remove eligibility of Copper Producers to make Copper Mark claims and use the Copper Mark logo;
- To maintain a log for Independent Reviewer and Copper Mark Assessor reports, and for Copper Producers’ Improvement Plans;
- To identify the need for, and oversee the implementation of, system improvements.

3 The Copper Mark Assurance Process Steps

3.1 Overview and Timeline

The Copper Mark Assurance Process follows five steps, an overview of which is given below and more detailed information provided for each step in subsequent sub-sections.

The Copper Mark Company accepts assurance conducted in accordance with ISO 19011:2018 Guidelines for Auditing Management Systems or the International Standard on Assurance Engagements, ISAE 3000. Under ISAE 3000, The Copper Mark Company accepts reasonable or [limited assurance](#).

Step 1: A Copper Producer participates in the Copper Mark by submitting an online application directly to The Copper Mark Company. If the application is accepted, The Copper Mark Company issues an invitation to sign a Letter of Commitment. Once the Letter of Commitment is signed by both parties, the Copper Producer will be known as a participating Copper Mark Producer and obliged to complete the requirements of the Copper Mark Assurance Process.

Step 2: From signing a Letter of Commitment, the Copper Producer will have 6 months to complete and submit a Self-Assessment through the Responsible Mineral Initiative's (RMI) Risk Readiness Assessment (RRA) platform and provide requisite supporting documented evidence. The Self-Assessment may be completed and submitted earlier. If there are delays in The Copper Mark Company reviewing reports, this will not be counted towards the Producer's timeline.

Step 3: The independent assessment step is divided in two. First, The Copper Mark Company appoints an Independent Reviewer(s) to review Copper Producers' Self-Assessments for their status of completion, validate the legitimacy of recognized equivalent standards or certifications, to reveal gaps, and to make a determination and recommendation to The Copper Mark Company on whether a site assessment is needed to assess the performance level of the Copper Producer against the Copper Mark Criteria.

Where it is determined by the Independent Reviewer that equivalency with recognized equivalent standards or certifications is demonstrated for all applicable Copper Mark Criteria, the Copper Producer may skip step 3 and the site will be eligible to make Copper Mark claims.

Second, where it is determined that a site-assessment is needed, The Copper Mark Company requires that a site-assessment is completed by a Copper Mark Assessor.

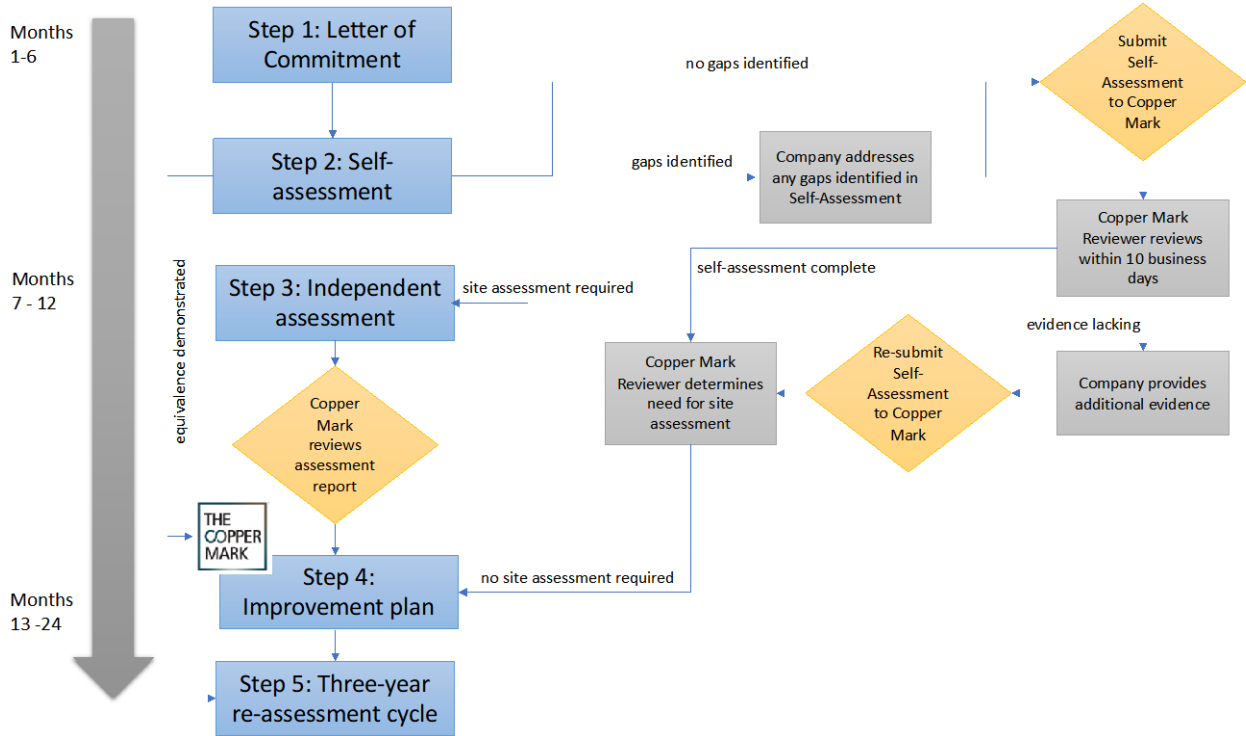
The Copper Mark Producer is responsible for selecting an approved Copper Mark Assessor, arranging the site assessment and notifying The Copper Mark Company of the dates for the site assessment.

The independent review and, where needed, the site assessment must be completed within 12 months of signing the Letter of Commitment. The self-assessments and independent assessment can be completed and related reports submitted in advance of this timeline.

Step 4: Following completion of Step 3, if the site-assessment reveals areas that fall short of fully meeting one or more Copper Mark Criteria, the Copper Producer commits to necessary improvement actions that are set out in an Improvement Plan and that must be completed within 24 months of signing the Letter of Commitment. A Copper Mark Assessor will verify that the implementation of the Improvement Plan by the Copper Producer. This may be done remotely or through an additional site-assessment depending on the types of improvements required. The Copper Producer must demonstrate “fully meets” for all Copper Mark Criteria within the 24-month time frame.

Step 5: Copper Producers must demonstrate continued conformance with the Copper Mark Criteria through a re-assessment by independent Copper Mark Assessors, or by demonstrating conformance with recognized equivalent standards or certifications, every 3 years from being eligible to make their first Copper Mark Assurance claim. A re-assessment of a Copper Producer can also be triggered at any time at the discretion of The Copper Mark Company when there has been a significant incident indicating a potential non-conformance of one or more Copper Mark Criteria, or when there is a substantial change or expansion at the site.

Figure 2: The Copper Mark Assurance Process Timeline



3.2 Claims

To make a Copper Mark Assurance claim, Copper Producers are required to be independently assessed as having ‘fully met’ or ‘partially met’ the 32 Copper Mark Criteria (Step 3) within 12 months of signing a Letter of Commitment (Step 1), either directly or through recognition of equivalent standards and certifications, and to commit to addressing all ‘partially met’ criteria within 24 months of signing a Letter of Commitment (Step 1).

For more information on claims, please refer to The Copper Mark Claims Guide.

3.3 Step 1: Letter of Commitment

Copper producing sites or facilities apply to be Copper Producers in the Copper Mark (see section 2.3 Copper Producers and Assessment Scope for a definition of a ‘Copper

Producer’) via an online form on the Copper Mark website (www.coppermark.org). The Copper Mark Company responds by requesting the Copper Producers sign a Letter of Commitment.

Copper Producers may apply for multiple sites at the same time, which will be treated as individual sites by The Copper Mark Company and in accordance with the definition of a ‘site’ (see Glossary).

3.4 Step 2: Self-Assessment

3.4.1 Copper Mark Criteria Self-Assessment

The Copper Mark Criteria are based on industry norms for responsible production practices and covers a comprehensive set of 32 issue areas. The Copper Mark Company currently uses the RMI’s RRA online platform as the framework for these criteria and partners with the RMI on the use of its RRA online platform.

Copper Producers complete a self-assessment survey on the RMI’s RRA online platform and submit it to The Copper Mark Company for review (refer to the Criteria Guide for detailed instructions on completing the self-assessment).

3.4.2 Type of Information to be Submitted in the Self-Assessment

Copper Producers should:

- 1) Provide site-level information;
- 2) Indicate existing certifications; initiatives; standards and externally assured management systems that apply to the site;
- 3) Upload supporting documentation for each of the Copper Mark Criteria (see the Criteria Guide for examples of types of evidence);
- 4) For criteria where the Copper Producer intends to claim an equivalent certification or independently verified system, the Copper Producer will indicate the name of the certification or system and provide evidence of verification (e.g. the certificate; the verification report; the continuous improvement plan). The evidence must include the following:
 - a. Name of the independent verifier/certification body;
 - b. Dates of the verification;
 - c. Scope of the verification (operations; issue areas; criteria; etc.);
 - d. Expiration of the certification; and,
 - e. The results of the verification.

- 5) For non-applicability, the Copper Producer will explain why the Copper Mark criterion is not applicable to the site or facility and provide relevant, verifiable documentation to support the explanation, where possible.

3.5 Step 3: Independent Assessment

The Copper Mark Company requires independent assessment of Copper Producers' self-assessment. The independent assessment step is divided into two: first, a desk review of Copper Producers' self-assessment that determines whether the evidence provided by Copper Producers is sufficient to substantiate their self-assessment for each criterion, or whether a further assessment is needed at the Copper Producer's site— a 'site assessment' - to gather more evidence to confirm the [performance determination](#).

It should be noted that a site assessment is not automatically required in all cases.

The Copper Mark Company expects assessors to apply ISO 19011 Guidelines for Auditing Management Systems or ISAE 3000 International Standard on Assurance Engagements. Under ISAE 3000, The Copper Mark Company accepts reasonable or limited assurance. Assessments based on limited assurance engagements will be reviewed after the first year of implementation.

3.5.1 Independent Desk Review of Self-Assessment

The Copper Mark Company assigns an Independent Reviewer to evaluate the performance of a Copper Producer against the Copper Mark Criteria based on their self-assessment and supporting documentation within **ten business days** of submission of the self-assessment through the RMI's RRA online platform.

The Independent Reviewer(s) will evaluate the self-assessment submitted by the Copper Producer, including a desk review of documentation, electronic media scan and remote interviews. This review includes an evaluation of the eligibility for equivalence of the verified standards or certifications, or externally assured management systems held by the Copper Producer based on the equivalency established by The Copper Mark Company. During the review, the reviewer may request additional information from the Copper Producer.

The following tasks will be completed by the Independent Reviewer:

1. Due Diligence: conduct background research on the Copper Producer based on publicly available information using Internet search engines to identify any issues of past performance or incidents related to the Copper Mark Criteria in the last five years. Sources will be reviewed, and information yielded will be reviewed for relevance to the site. The review will be shared with the Copper Mark Assessors where it is determined a site assessment is needed to inform their plans and preparation for the visit.
2. Completeness: check supporting documentation for evidence of policies and procedures that confirm the performance determination in the Self-Assessment against the Copper Mark Criteria;
3. Rating: review the self-assessed rating:
 - a. No change to the performance determination if evidence submitted is sufficient to support the self-assessed performance determination;
 - b. Adjust the rating if the evidence submitted does not support the self-assessed rating;
 - c. Request additional evidence if supporting documentation is insufficient (this could include remote interviews of site-level employees); and,
 - d. Determine the need for a site assessment based on the Copper Mark Criteria that are in scope and that are not covered through equivalency .
4. Equivalence: review equivalent certifications or externally assured management system and associated evidence, such as independent audit reports, to determine eligibility for equivalency recognition (see also section 2.4 below on Equivalence).

The Independent Reviewer will complete their review within **one month** of being assigned to review a Copper Producer's self-assessment survey and submit to The Copper Mark Company for a decision on whether and for which issue areas a site assessment is required.

The decision on the need for a site assessment will be made within **ten business days** of receiving the report from the Independent Reviewer and will be documented.

3.5.2 Independent Site Assessment

An independent site assessment will be required in the following situations:

1. There are no equivalent certifications or externally assured management systems in place.
2. Equivalent certifications or externally assured management systems cover some, but not all of the Copper Mark Criteria.
3. The due diligence review reveals potential issues of past performance gaps or incidents related to one or more of the Copper Mark Criteria.

During a site assessment, the Assessor will check in situ the status of the site's performance against the Copper Mark Criteria.

The results of the assessment will provide The Copper Mark Company with a sufficient level of confidence to decide whether to permit the Copper Producer to make Copper Mark claims and use the Copper Mark logo.

The scope of the site assessment will include all operations under the management control of the site (see the [Glossary](#) for the definition of a site).

3.5.3 Site Assessment – Copper Producer

Only Assessors that have been approved by The Copper Mark Company as having met the Copper Mark requirements for Assessors – listed and defined in Section 3 - can undertake site assessments of Copper Producers. Independent Reviewers can be Assessors if they meet the requirements in Section 3.

The Copper Producer may select a Copper Mark Assessor or team of Assessors for the site assessment from the registry of approved Assessors maintained by The Copper Mark Company, or request that an Assessor or team of Assessors of its own choosing be considered for approval by The Copper Mark Company. In such cases, the Assessor(s) will be required to provide sufficient evidence to The Copper Mark Company to demonstrate how they met the Copper Mark requirements for Assessors and to allow for a reasonable amount of time for The Copper Mark Company to review the application. The Copper Mark Company expects that most assessments will require a team of Assessors. The Copper Mark Company retains all rights to approve Assessors.

3.5.4 Site Assessment – Copper Mark Assessor

Assessments are to be conducted in accordance with ISO 19011 or ISAE 3000. The process to conduct the site assessment includes:

- Planning and preparation: the Copper Mark Assessor will work with the Copper Producer and The Copper Mark Company to define the scope (see section 2.3); identify applicable Copper Mark Criteria to be assessed; review the self-assessment and equivalence (where applicable); develop an agenda and organize the logistics of the site assessment.
- Assessment activities will include:
 - Opening meeting;
 - Management, employee and contractor interviews;

- Document review;
- Risk-based sampling of records and data that takes into account materiality; inherent risks; control risks; and detection risks;
- Stakeholder interviews with Indigenous Peoples groups and local communities, NGOs, community organizations, upstream supply chain actors, and government entities, as appropriate;
- Closing meeting.
- Reporting: the Assessor will draw assessment conclusions based on the site assessment and will indicate areas for improvement (where applicable). A detailed report, including the continuous improvement plan, where applicable, will also be developed by the Assessor to accompany the self-assessment results (see Appendix 2: Site Assessment Report Format). The Assessor will finalize their report within two weeks of completing the site assessment.

The Copper Mark Assurance Process requires Assessors to take a risk-based approach to gather and analyze information systematically on a Copper Producer’s performance against the Copper Mark Criteria to optimize efficiency and reduce the compliance burden for Copper Producers. A risk-based approach is understood to be the most appropriate way to prioritize data gathering and analysis that recognizes:

- Inherent risks – the legal, social and geographic context in which the Copper Producer operates;
- Control risks - the management systems the Copper Producer has in place and the voluntary initiatives and responsible practices which the Copper Producer is active in or follows; and
- Detection risk – the likelihood that the assessment methodology will identify non-conformances where they exist.

Assessors are expected to understand the Copper Producer’s operations, business activities, supply chain, and context with a view to identify and assess risks that have the most potential to cause significant gaps between the operation’s practices and the expectations of the Copper Mark Criteria.

Assessors are not expected to review equivalency determinations during the site assessment, but are expected to bring to the attention of The Copper Mark Company and include in their report any areas of non-conformance observed against any of the Copper Mark Criteria, even if equivalent conformance was determined during the review by the Independent Reviewer. The Copper Mark Company will engage the Copper Producer and, where possible, the equivalent standard owner, to resolve conflicting

evidence or assessment conclusions. Copper Producers may also use the Copper Mark Grievance Mechanism to resolve disputes.

The Copper Mark Company will review the independent Assessor's report and make a final decision within **ten business days** of receiving the report on whether the Copper Producer has met the requirements of The Copper Mark Company. The decision will be documented.

3.6 Step 4: Improvement Plan

If the Copper Producer has not fully met all the requirements of the applicable Copper Mark Criteria, the Copper Producer will develop an Improvement Plan to address the gaps in performance. Within **ten business days** of receiving the site assessment report, the Copper Producer will submit the Improvement Plan for review by an Independent Reviewer or a Copper Mark Assessor(s). The plan will be shared with The Copper Mark Company and The Copper Mark Company will monitor the Copper Producer's progress.

Within **12 months** of the assessment, a Copper Mark Assessor(s) will assess the implementation of the improvement plan. The assessment of the improvement plan will include only the areas that need reviewing in accordance with the improvement plan. The assessment of the improvement plan will be desk-based but may require a site assessment in cases where implementation needs to be assessed at the site level.

Within **24 months** of signing a Letter of Commitment, the Copper Producers will have to demonstrate and be independently assessed as fully meeting all the Copper Mark Criteria.

3.7 Step 5: Re-Assessment

To continue to make Copper Mark Assurance claims beyond having been assessed as 'fully meets' all Copper Mark Criteria (Step 4), copper producers must demonstrate continued conformance through a re-assessment (Step 5) by independent Copper Mark-approved assessors, or demonstrating conformance with recognized equivalent standards or certifications, every three years from being eligible to make their first Copper Mark Assurance claim (Step 3).

A re-assessment of a copper producer can also be triggered sooner. If there are significant changes in the scope of the assessment or significant events or incidents that occur in the interim, then the Copper Producer is obliged to inform The Copper Mark Company. The Copper Mark Company may require that the Copper Producer

completes Steps 2 to 4 even when doing so falls before the mandated three-year re-assessment cycle. Significant changes or events may include:

- A significant expansion of a site operationally or through acquisition;
- A change in the beneficial ownership or operating entity of the mine or facility through a divestment, entering into a joint venture, merger or acquisition;
- A significant environmental incident resulting in significant negative environmental impacts²;
- A significant industrial accident or incident resulting in one or more fatalities; or,
- A grievance lodged against the site in accordance through the Copper Mark Grievance Mechanism that may indicate non-conformance against any of the Copper Mark Criteria (for more information on grievances, see the Copper Mark Grievance Policy).

Re-assessment will also be triggered if the Copper Producer fails to submit evidence of updated certification or external assurance where those certifications or assurance periods of an equivalent scheme or certification expire during the three-year period, unless the Copper Producer can demonstrate they are in the process of or have applied for re-certification. If equivalent certifications are used, Copper Producers are required to inform The Copper Mark Company when they expire and to either provide a timeline, new certificate or notify The Copper Mark Company for the need of an assessment.

If there are no significant changes, the self-assessment confirms continued full conformance with all applicable Copper Mark Criteria.

3.8 Copper producers and Assessment Scope

3.8.1 Copper Producers

A Copper Producer is defined as an entity with an operating mining site and/or a facility with solvent extraction and electrowinning (SX/EW), smelting or refining operations that are located in one geographic area and are operated under one management system. The Copper Mark Assurance Process assesses a Copper Producer’s activities and operations at each site or facility, which might include but are not limited:

² Significant negative environmental impacts include but are not limited to: air emissions, releases to surface water or groundwater that exceed permit allowances; non-treatment or improper disposal of hazardous waste; changes to local biodiversity or ecosystems; impacts on endangered species; impacts on critical habitat or protected areas; impacts on communities that cause illness, injury or fatalities, or that negatively impact community access to or quality of water; spills or releases requiring significant clean up and/or evacuation or relocation of local communities; or contamination of land or soil.

- The principal activities and operations associated with mining and extraction and/or smelting and refining of copper;
- All locations and buildings for the management of waste, storing and maintenance of equipment;
- Offices and administration, and other auxiliary activities;
- Activities and buildings critical to the viability of the Copper Producer’s site operation, such as transport and storage warehouses; and,
- All business activities and management processes related to areas in scope of the assessment.

In the case of a joint venture, the name of the joint venture will be designated as the Copper Producer and the operating partner will be responsible for demonstrating conformance with the Copper Mark Criteria.

3.9 Equivalence

The Copper Mark Company acknowledges that Copper Producers may have undergone internal and/or third-party audits or assessments as part of their involvement in other sustainability standards or certification systems covering operating areas and practices similar to those covered by the Copper Mark Criteria. A core principle of the Copper Mark is to recognize as ‘equivalent’ other sustainability systems, good practice frameworks, certifications, and externally assured management systems where they match and meet the Copper Mark Criteria.

3.9.1 Equivalence Recognition

To have their conformance with existing systems recognized by The Copper Mark Company, Copper Producers should submit evidence of independent assessments in the RRA online platform.

The Copper Mark Company maintains a comparative analysis of the requirements of several standard systems and certifications against the Copper Mark Criteria in the form of a standards’ ‘equivalence matrix’. The ‘Equivalence Matrix’ is published by the Copper Mark as a standalone document and provides a guidance for which of the individual standard system’s requirements are considered equivalent to specific Copper Mark Criteria.

For standards, certifications and externally assured management systems that are not included in the matrix, Copper Producers should submit a request to The Copper Mark Company for an equivalence review of the standard or certification. The Copper Mark

reserves all rights to recognize all or parts of any other standard system as equivalent to the Copper Mark Criteria.

The reviewer will review the submitted certifications or externally assured management systems to make sure that they are legitimate. The Copper Mark Company reserves the right to ask for more details where it deems it necessary.

Where there is evidence that a credible independent assessment or third-party certification has identified and documented a level of conformance by the Copper Producer that is equivalent to the expectations of a Copper Mark criterion, that criterion will be considered assured by The Copper Mark Company and will not require further assurance within the Copper Mark Assurance Process.

The reviewer will determine whether the criterion will be designated as partially or fully meets based on the performance determination of the equivalent standard system.

3.9.2 Add-On Assessments

Where the Copper Producer has an upcoming independent assessment under an external system that is recognized by The Copper Mark Company, it is possible that a Copper Mark “add-on” can be incorporated to “top-up” the scope of the external assessment to include Copper Mark Criteria that are not covered by the system. This may be determined by the Copper Producer in consultation with The Copper Mark Company and the assigned Assessor(s). The Assessor(s) would have to be approved by The Copper Mark Company.

4 Assessor Selection and Evaluation

4.1 Selection

Independent reviewers and Assessors or teams of Assessors will be approved by The Copper Mark Company based on the following requirements³:

| | |
|--------------------|---|
| <p>Objectivity</p> | <p>Assessors must be independent⁴ of the Copper Producer being evaluated and its supply chain to ensure the objectivity, confidentiality and non-existence of conflicts of interest.</p> <p>Assessors cannot have been employed directly by or provided consulting or advisory services related to the scope of the Copper Mark Criteria to the Copper Producer within the last three (3) years.</p> <p>Assessors must disclose any business or financial relationship with or financial interest in the Copper Producer or entities in its supply chain within the scope of the assessment. Potential conflicts of interest will be evaluated by The Copper Mark Company.</p> <p>Assessors cannot have provided any consulting services to the Copper Producer or its supply chain entities within the scope of the assessment within the past three (3) years.</p> |
| <p>Experience</p> | <p>Experience conducting assessments of a similar scope under another scheme or current certification as a management system auditor from a recognized assessment body that includes an examination or other competency verification component.</p> |

³ These are minimum requirements that may be further detailed in the Copper Mark Assessor Approval Process.

⁴ Assessors should be independent of the activity being assessed wherever practicable, and should in all cases act in a manner that is free from bias and conflict of interest (adapted from ISO 19011:2018)

| | |
|----------------|--|
| Expertise | <p>Demonstrated knowledge, understanding, and at least five (5) years working experience in the implementation, maintenance, or auditing of the following applicable areas in mining and/or in smelting and refining:</p> <ul style="list-style-type: none"> • Environmental management systems, including but not limited to biodiversity conservation, water stewardship, and impact assessments; • Occupational health and safety management systems; • Labor, industrial relations, and human resources management systems; • Social impact assessments and human rights due diligence; • Community relations and stakeholder engagement; • Compliance and ethics; • Mineral supply chain due diligence; • Sustainability reporting. |
| | <p>Demonstrated skills and experience performing stakeholder interviews in local communities through culturally appropriate means.</p> |
| | <p>Knowledge of ISO 19011 Guidelines for Auditing Management Systems or ISAE 3000 International Standard on Assurance Engagements.</p> |
| Qualifications | <p>Completion of university degree in a relevant field.</p> |
| | <p>Completion of the Copper Mark training modules (see section 3.2).</p> |
| | <p>Experience and proficiency of at least one Assessor in the country and national language of the relevant site(s).⁵</p> |

The Copper Mark Company maintains an up-to-date list of approved Assessors that includes a description of their competencies in line with the requirements above; evidence of qualifications; conflict of interest disclosures; confidentiality agreements; training records; and results of the Copper Mark observations, including any pending improvement actions (see 4.3 Evaluation).

⁵ Translators may be used to supplement other Assessors in the team who are not proficient in the local language.

The Copper Mark staff that review the reports of Independent Reviewers and Copper Mark Assessors to determine conformity of the Copper Producer's performance against the Copper Mark Criteria will also meet the objectivity requirements outlined above and will sign the Copper Mark conflict of interest policy.

4.2 Training

Assessors are required to undergo the Copper Mark training modules prior to conducting an assessment against the Copper Mark Criteria. The Copper Mark Company will maintain records of successful training completion.

4.3 Evaluation

The Copper Mark Company will review and monitor the ability of Assessors to carry out assessments in conformity with the Copper Mark requirements, based on the objectives and scope of the assessment and judged against assessment records.

5 Reporting

5.1 Copper Mark Reporting Requirements

On receipt of the assessment report from the Assessor, The Copper Mark Company will:

- Confirm the competence of the Assessor(s) against the independent Assessor requirements;
- Review the report and confirm that the assessment process and findings are consistent with the instructions in the Copper Mark Assurance Process and the Criteria Guide;
- Document the scope and relevant details about the Copper Producer including the name and geographic location of the site, the date the Copper Mark becomes effective and expires, and when re-assessment is due;
- Issue formal documentation and information to the Copper Producer, including the Copper Mark Brand Guidelines that contains information on:
 - Available Copper Mark Producer logo formats;
 - Minimum size of logos;
 - Colors and permitted adaptations;
 - Background colors;
 - Exclusion zone;
 - Visual examples of acceptable and incorrect uses of logo placement, size, color, etc.
- List the Copper Producer on the Copper Mark website. A summary report or assurance statement will be published and will include at a minimum:
 - The name of the site and unique Copper Mark number;
 - The type of production facility (Mined, Smelted & Refined, Mined & Smelted/Refined)
 - The duration of the site's Copper Mark and its expiry date, and the schedule for the next re-assessment;
 - Date of the assessment activities and the assessment period;
 - Assessment activities and methodology;
 - Assessment conclusions;
 - Statement of conformance; and,
 - Any non- applicable Copper Mark Criteria.

5.2 Public Reporting

The Copper Mark Company will maintain on its website an up-to-date list of Copper Producers eligible to carry the Copper Mark.

The full assessment report will not be made public.

6 Data Confidentiality

The Copper Mark Company will access information about Copper Producers provided in:

- An application for the purposes of becoming a Copper Producer in the Copper Mark;
- Completed Copper Mark Criteria Surveys;
- Assessment reports for the purposes of assessment; and,
- Continuous improvement plans.

The Copper Mark Company will sign an agreement with Copper Producers, including confidentiality clauses.

Assessors and Independent Reviewers may also have access to confidential or commercially sensitive information during the course of the assurance process. As part of becoming an Assessor, an agreement will be signed with The Copper Mark Company and the Assessor to prevent disclosure of commercially sensitive information to third parties.

7 Grievance Mechanism

As an independent assurance system, the Copper Mark has a Grievance Mechanism to process concerns that may arise from Copper Producers, Copper Mark Assessors, stakeholders and the public regarding the initiative, the Copper Mark Assurance Process, Assessor competencies, or Copper Mark claims and logo use.

The grievance mechanism aims to be aligned with the UN Guiding Principles on Business and Human Rights' criteria for effectiveness of non-judicial grievance mechanisms.

The Copper Mark Company aims to investigate grievances in a fair, balanced, and transparent manner and to resolve the issues efficiently and effectively. For more information, see the Copper Mark Grievance Policy.

8 Program Communication and Evaluation

8.1 Communication

The Copper Mark Company will communicate the elements of the program, including any updates to requirements, the assurance process or guidance documents, through its website and associated documents that are accessible on the website.

Assessors are provided with the relevant documents and protocols prior to assessments.

8.2 Program Evaluation

When program requirements change or are updated, and at least every three years, The Copper Mark Company will review and, as necessary, update its assurance process, requirements, and guidance for Copper Producers and Assessors. The Copper Mark Company will evaluate whether the program is meeting its own aims and objectives in relation to responsible production in the copper sector as part of this review. The review will include analysis of data from independent review and assessment reports and a survey of Copper Producers and other stakeholders.

9 Glossary

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| Assessment | An evaluation of the performance of a site against the Copper Mark Criteria. |
| Assessor | An independent service provider or individual (third party) that is approved by The Copper Mark Company and contracted by a Copper Producer company to assess and verify conformance with the Copper Mark Criteria at Copper Mark Producers' sites. |
| Assurance Process | The steps and actions required in the Copper Mark to obtain and consider evidence in order to enhance the degree of confidence regarding conformance with the Copper Mark Criteria. |
| Chain of Custody (CoC) | The documented sequence of custody of material as it moves along the supply chain. CoC material is created by an eligible material declaration, and then transferred from one business to another along the supply chain by issuing a CoC transfer document. ⁶ |
| Copper Mark Criteria for Responsible Production (Copper Mark Criteria) | The Copper Mark uses the Risk Read Assessment (RRA) as the basis for evaluating Copper Producers' performance against the Copper Mark Criteria. The RRA condenses over 50 international standards and guidelines into 32 issue areas covering environmental, social and governance aspects of mining, smelting and refining operations. For the full list of criteria, see the Criteria Guide. |
| Copper Producer | A producer is a company involved in the production of copper, including but not limited to companies involved in mining, solvent extraction and electrowinning (SX/EW), smelting, or refining of copper. |
| Equivalence | Equivalent systems are defined as having standards and assurance requirements that are materially comparable in scope and intent as the Copper Mark Criteria and Assurance Process. |
| Facility | Operations involved in the mining, solvent extraction and electrowinning (SX/EW), smelting, or refining of copper for sale or further processing. A site may comprise several activities in different locations but in the same geographic area (e.g. mines, wastewater treatment facilities, refineries, ports and associated infrastructure), and under the same management control. In this document, the term site is generally used to refer to a mining site and facility is used to refer to any other type of operation associated with copper production. |

⁶ Responsible Jewellery Council Chain of Custody Guidance (2017)

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|---------------------------|--|
| Independent Reviewer | An independent service provider or individual (third party) that is approved by The Copper Mark Company and contracted by The Copper Mark Company to review Copper Producers' Copper Mark criteria self-assessments. An Independent Reviewer can also be a Copper Mark Assessor. |
| Limited Assurance | The objective of a limited assurance engagement is a reduction in assurance engagement risk to a level that is acceptable in the circumstances of the engagement, but where that risk is greater than for a reasonable assurance engagement, as the basis for a negative form of expression of the practitioner's conclusion. ⁷ |
| Performance Determination | Level of performance assigned to each risk area based on whether the Copper Producer company's practices 'does not meet', 'partially meets', or 'meets' the Copper Mark Criteria (see the Criteria Guide for further detail). |
| Site | Operations involved in the mining, solvent extraction and electrowinning (SX/EW), smelting, or refining of copper for sale or further processing. A site may comprise several activities in different locations in the same geographic area (e.g. mines, wastewater treatment facilities, refineries, ports and associated infrastructure), and under the same management control. Integrated sites where the point of extraction and transformation or processing are critical operations to the output of the site, will generally be treated as one site. In this document, the term site is generally used to refer to a mining site and facility is used to refer to any other type of operation associated with copper production. |

⁷ 'International Framework for Assurance Engagements', International Federation of Accountants (2008): https://www.ifac.org/system/files/downloads/International_Framework_for_Assurance_Engagements.pdf

10 Annex 1: Site Assessment Report Format

At minimum, the Site Assessment report should include:

- Copper Producer company information;
- Assessor information;
- Assessment agenda;
- Relevant Copper Mark Criteria;
- Site/facility profile:
 - Geographic scope;
 - Name of site(s);
 - Location;
 - Area;
 - Type of operation;
 - Current production/generation figures;
 - Number of employees and contractors;
- Description of activities to verify conformance with each Copper Mark Criteria;
- Description of performance determination for each Copper Mark Criteria;
- Continuous improvement plan, if applicable;
- List of documents reviewed;
- Number and type of interviewees by stakeholder category (management, employees, contractors, communities, NGOs, government officials, etc.).