

## The Copper Mark Working Group Code of Conduct

The Copper Mark Working Group Code of Conduct is shared with all individuals and organisations who participate in the Copper Mark working groups. It is intended to establish the meeting ground rules, promote a good working order, and ensure compliance with applicable laws. The Copper Mark Working Group Code of Conduct should be read in conjunction with working group terms of reference, addenda, and any agreements already in place between the participants and the Copper Mark.

**ANTITRUST:** It is the Copper Mark's policy to fully comply with all applicable laws, including antitrust and competition laws. The Copper Mark does not condone or in any way seek to facilitate antitrust or competition law breaches.

- In particular, at meetings which the Copper Mark convenes or presides over, it does not permit any participants to discuss or share confidential proprietary or otherwise commercially sensitive information including:
  - current or future pricing practices;
  - terms and conditions of sale;
  - outputs and quotas;
  - market shares;
  - product or marketing plans;
  - commercial strategy;
  - business relations with suppliers and customers; or
  - any other matter on which participants compete.
- Discussing or sharing this type of information can have serious consequences for both the Copper Mark and the participants at such meetings including in-depth regulatory investigation, heavy fines and lasting reputational damage.
- Participants should not hesitate to voice any concerns they may have regarding the conduct of others at such meetings. During the course of a meeting, if a participant believes that the discussion is turning to a sensitive or inappropriate subject, the participant will express that belief and request that the attendees return the discussion to a less sensitive area. This will be formally recorded in the minutes of the meeting to demonstrate compliance. If the discussion continues, the Chair will end the meeting. This will also be formally recorded.
- To be clear, the Copper Mark supports responsible production practices in the copper industry as a whole and does not engage with matters relating to individual or generic pricing, terms or conditions of sale, production or sales levels, salaries, customers or suppliers. It makes no commercial recommendations of any kind.

**AUTHORITY AND REPORTING:** The working group and its participants will not represent themselves as having any authority beyond that delegated in the Terms of Reference (ToR) .

**CHATHAM HOUSE RULE:** Working group meetings are held under Chatham House rules. Participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed.

**CONFIDENTIALITY:** From time to time, the Working Group will of necessity be discussing information regarding the Working Group’s own strategic activities in the context of the sustainability agenda. This could include ‘sensitive’ information in the sense that it requires careful handling, not that it is commercially sensitive. For example, the Working Group may have commissioned research on a particular industry-wide issue which may or may not be published and its unauthorised disclosure could have a negative impact. Working Group participants will be alerted to the sensitive nature of any such information and must abide by their obligations of confidentiality.

**PROFESSIONALISM:** Working group participants are expected to prepare for meetings, engage in meaningful discussion, and maintain a respectful, constructive, and professional tone.

**NOTES AND DECISIONS:** Working group participants will receive notes from the meetings and be given time to respond before any decisions are considered final.