



The Copper Mark Assurance Process

May 2021

Revision Date:	Publication Date:	Organization:
1 May 2021	1 May 2021	The Copper Mark
Title:		Type:
The Copper Mark Assurance Process		Public

Table of Contents

1	<i>Introduction</i>	3
2	<i>Participating Entities</i>	4
3	<i>The Copper Mark Assurance Process Steps</i>	8
3.1	Overview and Timeline	8
	Step 1: Commitment	13
3.2	Step 2: Self-Assessment	13
3.3	Step 3: Independent Review	14
3.3.1	Independent Desk Review of Self-Assessment	15
3.3.2	Independent Site Assessment	16
3.3.3	Site Assessment	17
3.3.4	Site Assessment – Copper Mark Assessor	17
3.3.5	Remote Assessments	19
3.3.6	Observers to the Site Assessments	19
3.3.7	Assessment Outcomes	20
3.4	Step 4: Improvement Plan	21
3.4.1	Timelines for Implementing Improvement Plans	21
3.4.2	Types of Improvement Plans	21
3.4.3	Submitting the Improvement Plan	22
3.4.4	Monitoring	22
3.4.5	Outcomes from the Independent Assessment of the Implementation of Improvement Plans	23
3.5	Step 5: Re-Assessment	23
3.6	Equivalence	25
3.6.1	Equivalence Recognition	25
3.6.2	Additional Information	26
3.6.3	Add-On Assessments	26
4	<i>Assessor Selection and Evaluation</i>	28
4.1	Selection	28
4.2	Training	30
4.3	Evaluation	30
5	<i>Reporting</i>	31
6	<i>Data Confidentiality</i>	33
7	<i>Grievance Mechanism</i>	34

8	<i>Program Communication and Evaluation</i>	35
8.1	Communication	35
8.2	Program Evaluation.....	35
9	<i>Glossary</i>	36
10	<i>Annex 1: Site Assessment Report Format</i>	39

1 Introduction

The Copper Mark is a credible assurance framework to promote responsible production practices and demonstrate the copper industry's 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.

Assurance is the process by which The Copper Mark ensures that sites meet the requirements of the relevant standard(s). The Copper Mark seeks to implement an assurance process that is recognized by stakeholders as credible, incorporates best international practice, and aligns with the following five organizational principles:

1. Pragmatic

The Copper Mark is achievable, implementable and fit-for-purpose. Companies are able to use documented evidence as a significant contribution to the assessment.

2. Inclusive

The Copper Mark is accessible to all companies in scope, at whatever stage along their journey to sustainability and to all sizes of operations.

3. Recognition

The Copper Mark recognizes existing standards systems, reporting frameworks, and certifications in order to avoid redundancy and to promote the use of these initiatives.

4. Progressive

The Copper Mark acknowledges that a period of implementation is required to achieve full conformance with its standards.

5. Continuous improvement

The Copper Mark monitors overall progress through annual reviews of the implementation of improvement actions.

Aligned with the principle on recognition, The Copper Mark seeks to avoid redundancy and promote the use of existing initiatives by making its Assurance Process available to sites that are not Participants in The Copper Mark, but wish to be assessed against the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (Joint Due Diligence Standard).

This document defines The Copper Mark Assurance Process for:

1. Sites of a copper producer that are Participants in The Copper Mark and are assessed against The Copper Mark Criteria for Responsible Production, covering all 32 issue areas and including the Joint Due Diligence Standards for Criterion 31: Due Diligence in Mineral Supply Chain.

2. Sites that are assessed only against the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc.

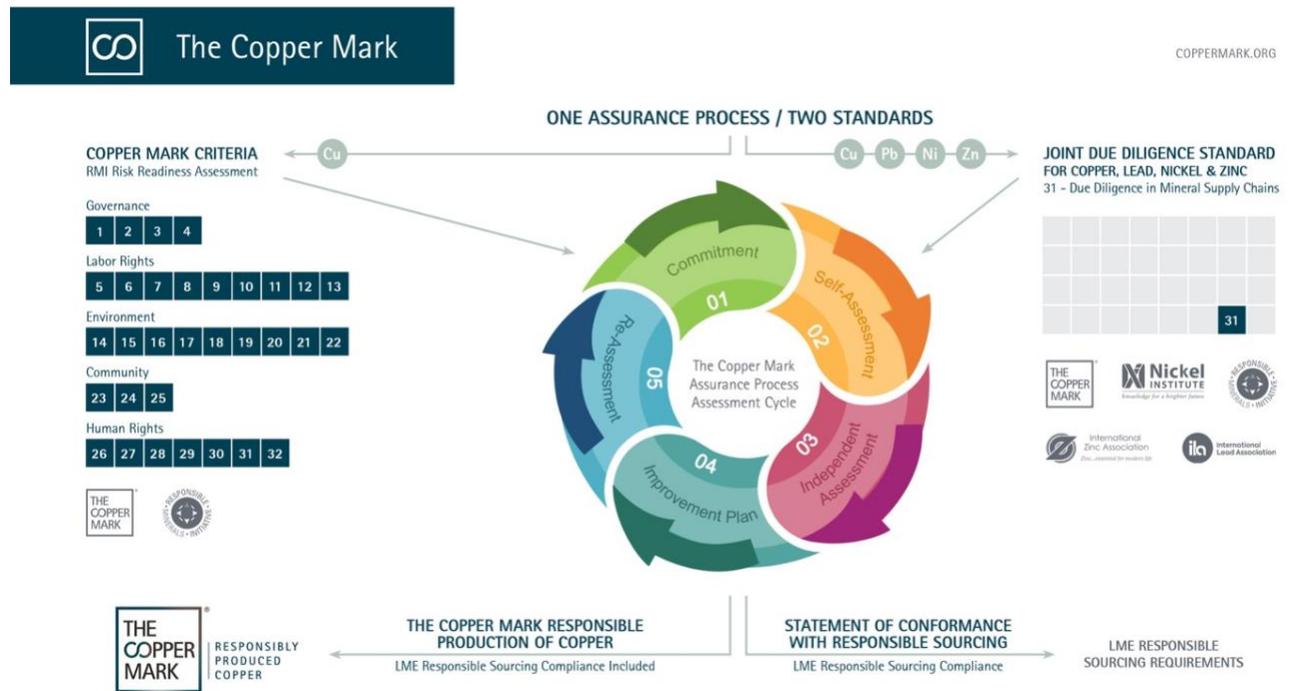
In this document, the Copper Mark standards refers to

1. The Copper Mark Criteria for Responsible Production (Copper Mark Criteria). The Copper Mark uses the Risk Readiness Assessment (RRA) of the Responsible Minerals Initiative (RMI) as the basis for evaluating Participants' performance, including the RRA-Copper Mark Criteria Guide of February 2020.
2. The Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of February 2021.

Currently, The Copper Mark Assurance Process does not provide for chain of custody.

The Copper Mark Assurance Process applies regardless of the Copper Mark standard against which the site is being assessed. Requirements that are specific to The Copper Mark Criteria or the Joint Due Diligence Standard (which may be assessed using other assurance processes) are delineated in this document as appropriate.

Figure 1: The Relationship between the Copper Mark Criteria and the Joint Due Diligence Standard



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. Sites.
- B. Copper Mark [Assessors](#).
- C. [Independent Reviewers](#).
- D. The Copper Mark.

A. Sites

The Copper Mark Assurance Process must be implemented at site-level. 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. Companies may engage in and operate one site or multiple sites. In the case of a joint venture, the name of the joint venture will be designated as the site and the operating partner will be responsible for demonstrating conformance.

Sites of the following companies are eligible to take part in The Copper Mark Assurance Process:

Sites of a Copper Producer (also referred to as “Participants”): A Participant is a copper producer assessed against all 32 Copper Mark Criteria. Only Participants are eligible to make Copper Mark Claims in accordance with [The Copper Mark Claims Guide](#). A copper 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. To be eligible to be a Participant in The Copper Mark, the entity must produce copper or copper products. The Copper supply chain includes multi-metal producers. Multi-metal producers can choose to include these other metals in the scope of the Copper Mark requirements.

Participants must sign a Letter of Commitment, are required to pay annual fees and have access to The Copper Mark working groups, governance bodies and other resources.

As part of the assessment against The Copper Mark Criteria, Participants are required demonstrate conformance with Criterion 31: Due Diligence in Mineral Supply Chains. In accordance with the Criteria Guide, Participants should refer to specific standards applicable to their metals to demonstrate conformance. This means, participants are required to implement the Joint Due Diligence Standard in accordance with the following timeline:

- From 9 February 2021 to 31 December 2021, Participants are encouraged to implement the Joint Due Diligence Standard to demonstrate conformance with Criterion 31.
- From 1st January 2022 onwards, Participants are required to implement the Joint Due Diligence Standard to demonstrate conformance with Criterion 31.

Sites assessed only against the Joint Due Diligence Standard: Sites of any company extracting, producing and/or trading copper, lead, nickel or zinc materials from mine sites, including producers of refined metal products, which are generally referred to as the refiner. The Joint Due Diligence Standard also applies to producers of nickel chemical compounds and all nickel raw intermediate materials (including ferro-nickel, nickel pig iron, and nickel oxide sinter) entering production of stainless steel, alloys, batteries, and plating, and where no refining takes place.

Sites that are assessed only against the Joint Due Diligence Standard **are not Participants in The Copper Mark.**

The Copper Mark Assurance Process assesses a site's activities and operations. The scope is determined by the site, assessment firm, and the Copper Mark and might include but is not limited to:

- The principal activities and operations associated with the scope of the assessment;
- 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 site' operation, such as transport and storage warehouses; and,
- All business activities and management processes related to areas in scope of the assessment.

Sites in the exploration phase are not eligible to participate. A site must have been operating for at least 3 months before undergoing the Site Assessment.

Sites' responsibilities when using The Copper Mark Assurance Process include:

- Committing to complete the Assurance Process including through contractual agreements with The Copper Mark;
- 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 criteria of the applicable Copper Mark standard;
- Maintaining records related to their participation in The Copper Mark Assurance Process;
- Completing self-assessment surveys, accepting independent reviews on this information and receiving assessors on-site;
- Contracting an approved Copper Mark Assessor where appropriate; and
- Making available information necessary to determine their conformance with Copper Mark standards.

B. Copper Mark Assessors

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 site visits to assess site conformance to the standard. The Copper Mark reviews and approves assessor applications using the criteria listed in Section 4.

Copper Mark Assessors have the following responsibilities:

- Complete the Copper Mark's approval process for Assessors including signing the declaration of commitments to quality, independence and professional conduct;
- Participate in any required training;
- Maintain approval;
- Conduct site assessment visits and prepare assessment reports; and
- Provide feedback and recommendations on the sites' Improvement Plans and findings from site-visits.

C. Independent Reviewers

Independent Reviewers are independent parties appointed by The Copper Mark to review the self-assessments of Participants. The Independent Review does not apply to sites that are only assessed against the Joint Due Diligence Standard.

The Independent Reviewer checks the completion status of self-assessments and of supporting documentary evidence submitted by Participants 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:

- Participate in any required training;
- Complete desk reviews on Participants self-assessments;
- Verify the legitimacy of Participants' submissions for equivalent certifications or standards schemes recognized by The Copper Mark; and
- Make recommendations on the need for, scope and focus areas of site assessments.

D. The Copper Mark

The Copper Mark 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 improvement plans as well as claims and logo use. It is accountable for all compliance and decisions related to Participants and other sites using the Assurance Process.

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

- Manage the approval and maintenance process for Copper Mark Assessors;
- Approve and contract Independent Reviewers;
- Assess other certification or standards schemes for equivalency of their standard and assurance requirements;
- Verify and confirm the legitimacy of submissions for equivalent certifications or standards schemes recognized by The Copper Mark;
- Confirm and remove eligibility of Participants to make Copper Mark claims and use The Copper Mark logo;
- Maintain a log for Independent Reviewer and Copper Mark Assessor reports, and for sites' Improvement Plans;
- Provide guidance and interpretations on Copper Mark standards and this Assurance Process; and
- Identify the need for, and oversee the implementation of, system improvements.

3 The Copper Mark Assurance Process Steps

3.1 Overview and Timeline

This section provides details on the steps of the The Copper Mark Assurance Process for sites that are Participants in The Copper Mark and other sites that are assessed against the Joint Due Diligence Standard.

The Copper Mark accepts assurance conducted in accordance with the auditing methodology outlined in ISO 19011:2018 Guidelines for Auditing Management Systems or the International Standard on Assurance Engagements, ISAE 3000. Under ISAE 3000, The Copper Mark accepts reasonable assurance only.

An overview of the similarities and differences is outlined in the chart below.

Activity	Participants in The Copper Mark	Other eligible sites
Applicable Copper Mark standard(s)	Copper Mark Criteria From 9 February 2021 to 31 December 2021, Participants are	Joint Due Diligence Standard

	<p>encouraged to implement the Joint Due Diligence Standard to demonstrate conformance with Criterion 31.</p> <p>From 1st January 2022 onwards, Participants are required to implement the Joint Due Diligence Standard to demonstrate conformance with Criterion 31.</p>	
Step 1: Commitment	Letter of Commitment and Producer Agreement	Pre-assessment Questionnaire and Joint Due Diligence Standard Agreement
Step 2: Self-Assessment	required	voluntary
Step 3: Independent Assessment, Independent Desk-based Review of Self-Assessment	√	No
Step 3: Independent Assessment, Site Assessment	√	√
Step 4: Improvement Plan (where applicable)	√	√
Step 5: Re-assessment	√	√
Eligible to use claims in accordance with The Copper Mark Claims Guide	√	No
Sites using this process published on website	<u>√</u>	<u>√</u>
Results published on website	√	√

The Assurance Process generally includes five core steps that are described in more detail in the following sections.

Figure 2: Overview of The Copper Mark Assurance Process Cycle

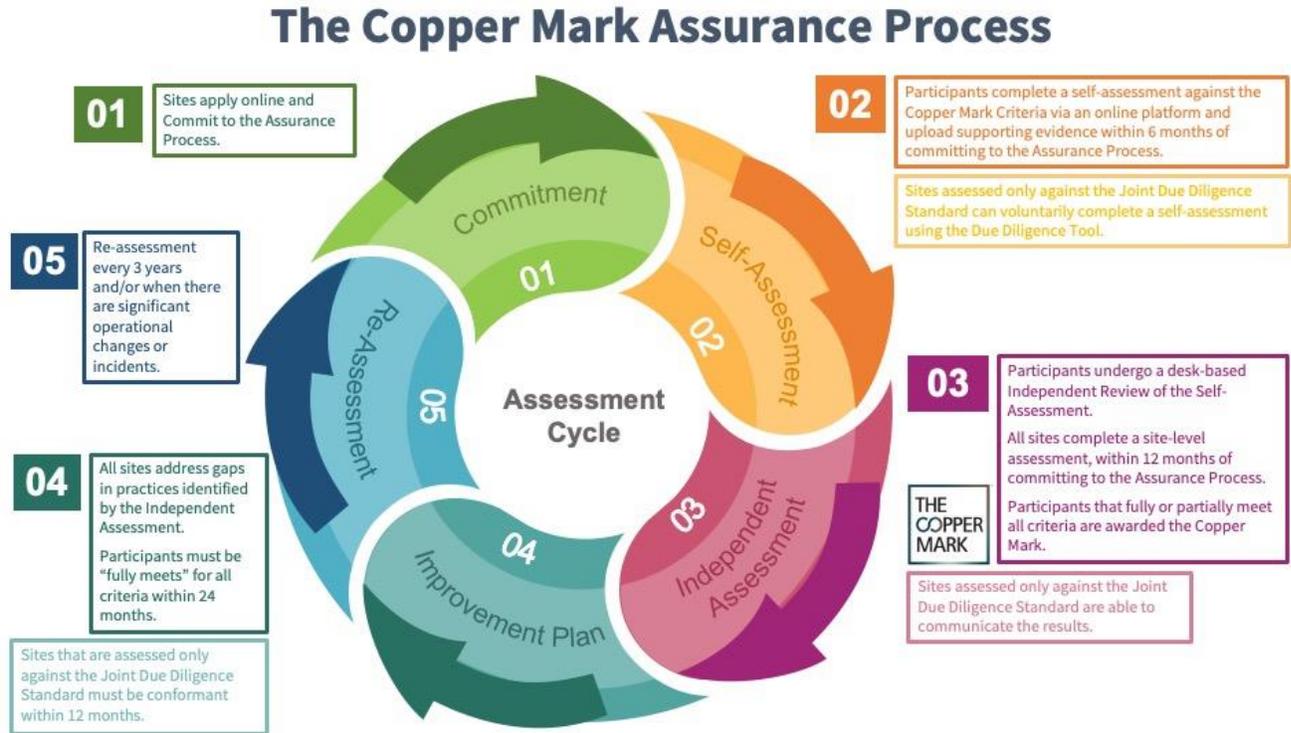


Figure 3: The Copper Mark Assurance Process Timeline for Copper Mark Participants

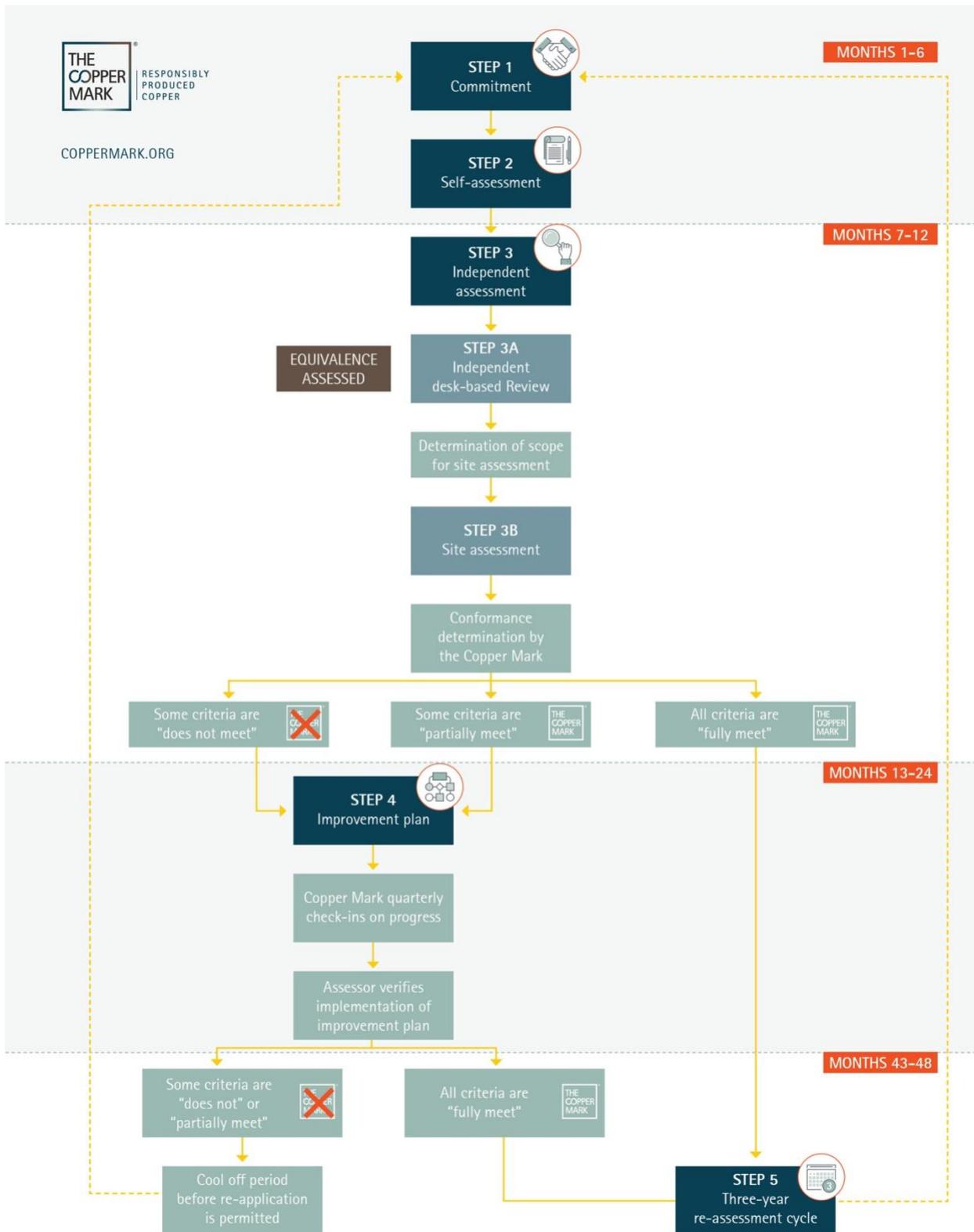
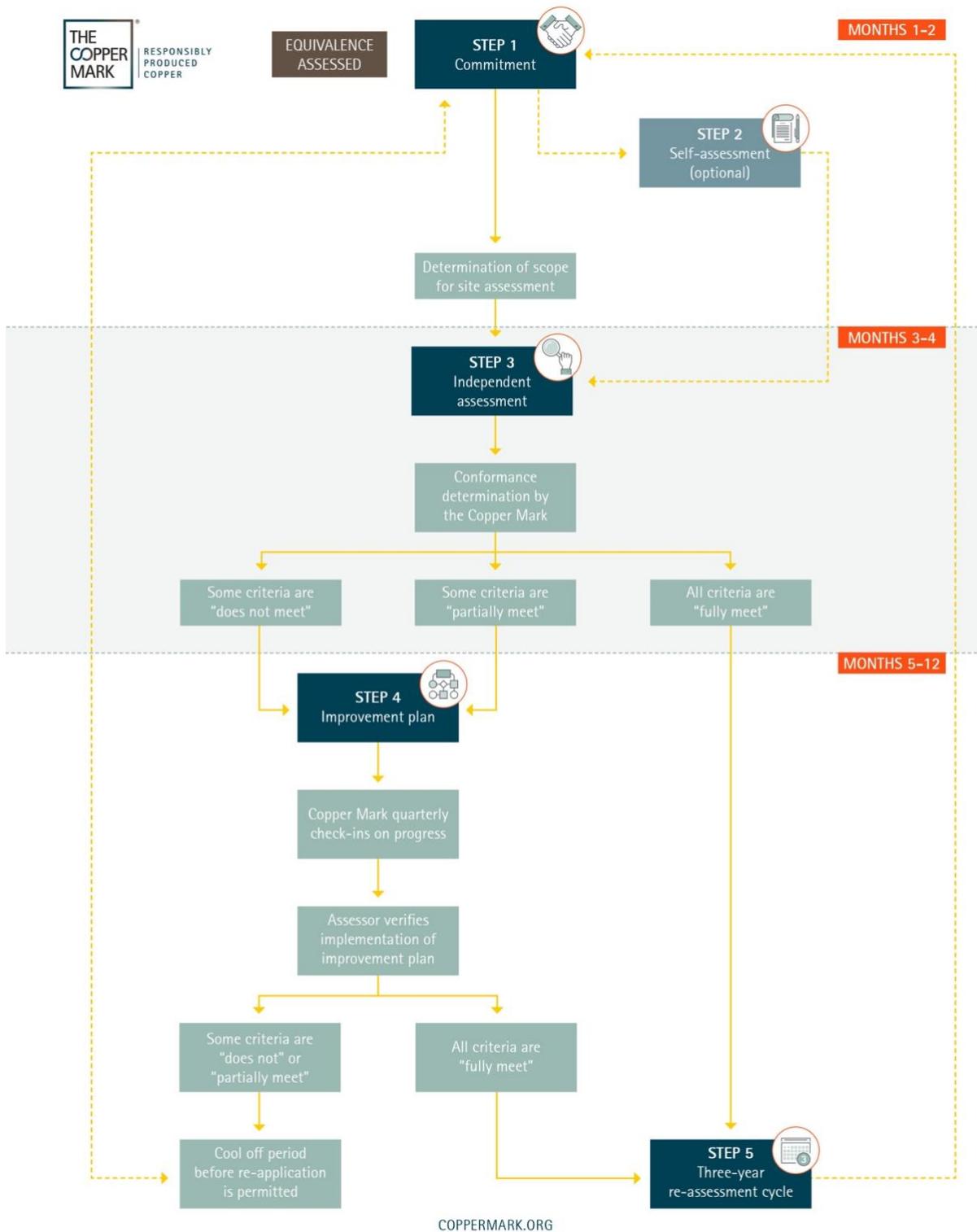


Figure 4: The Copper Mark Assurance Process Timeline for Sites that are assessed only against the Joint Due Diligence Standard



Step 1: Commitment

Activity	Participants in The Copper Mark	Other eligible sites
Step 1: Commitment	Letter of Commitment and Producer Agreement	Pre-assessment Questionnaire and Joint Due Diligence Standard Agreement

A site contacts The Copper Mark staff, who will confirm that the site is eligible to use the Assurance Process. If the site is eligible, The Copper Mark invites the site to sign the required agreements, pay the associated fees and provide relevant information regarding operations and ownership. The Copper Mark will review information received prior to accepting the application. Once complete, the Copper Mark will countersign all documents and list the site on the Copper Mark website.

Companies may apply for multiple sites at the same time, each of which will be treated as individual site by The Copper Mark and in accordance with the definition of a 'site.'

Participants in The Copper Mark: the site must submit the Letter of Commitment and the Producer Agreement. While the Producer Agreement may be signed at company-level, each site must sign the Letter of Commitment.

Sites assessed only against the Joint Due Diligence Standard: the site must submit the Pre-Assessment Questionnaire, the Joint Due Diligence Agreement, and any recognized assessment reports and associated improvement plans for consideration of equivalency. The Copper Mark will review these reports in order to determine equivalency and adjust the scope of the Site Assessment as appropriate.

The Commencement Date is the date at which both the site and the Copper Mark have signed the required agreements. The Commencement Date officially starts the Assurance Process timeline and obliges the site to complete steps 2-5 as appropriate.

3.2 Step 2: Self-Assessment

Activity	Participants in The Copper Mark	Other eligible sites
Step 2: Self-Assessment	required	voluntary

Participants in The Copper Mark: The Copper Mark uses the Risk Readiness Assessment (RRA) owned by the Responsible Minerals Initiative (RMI) and the RRA-Copper Mark Criteria Guide as the basis for evaluating Copper Producers' performance against The Copper Mark Criteria. Participants complete a self-assessment survey on the RMI's RRA online platform and submit it to The Copper Mark for review. Participants may submit supporting documentation to The Copper Mark through an alternative platform where requested.

When submitting the self-assessment, Participants shall:

1. Provide site-level information;
2. Indicate existing certifications, initiatives, and standards that apply to the site;
3. Upload supporting documentation for each of The Copper Mark Criteria and ensure evidence is clearly linked to the relevant criterion;
4. For criteria where the Participant intends to claim an equivalent certification or independently verified system, the Participant 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; materials; issue areas; criteria; etc.);
 - d. Expiration of the certification;
 - e. Improvement plans for any criteria that are not “fully meets”; and,
 - f. The results of the verification.
5. For criteria that are not applicable, the Participant should explain why the criteria is not applicable to the site or facility and provide relevant, verifiable documentation to support the explanation, where possible.

Sites assessed only against the Joint Due Diligence Standard: A self-assessment is not required. However, sites may choose to complete a self-assessment using the Joint Due Diligence tool. Doing so may help the site identify strengths and opportunities for improvement ahead of the Independent Site Assessment. Where the site completed a self-assessment, it is recommended for the site to share it with the selected assessor.

3.3 Step 3: Independent Review

Activity	Participants in The Copper Mark	Other eligible sites
Step 3: Independent Assessment, Independent Review	X	No
Step 3: Independent Assessment, Site Assessment	X	X

The Copper Mark requires that all applicable criteria are independently assessed at the site level.

The Copper Mark recognizes existing systems that are independently assessed at site-level in order to avoid redundancy and to promote the use of these initiatives. Equivalent systems are defined as having standards and assurance requirements that are materially comparable in scope and intent to The Copper Mark Criteria and Assurance Process. Sites may refer to Section 3.8 Equivalence for details on the extent to which equivalent systems can be used to demonstrate conformance with Copper Mark standards.

Participants in The Copper Mark: The independent assessment step is divided into two: first, a desk review of Participant's self-assessment to inform the scope of the Independent Site Assessment; and second the independent assessment at the Participant's site – a 'site assessment' - to gather evidence to confirm the [performance determination](#).

Sites assessed only against the Joint Due Diligence Standard: The independent assessment is a 'site assessment' to gather evidence to confirm the performance determination.

3.3.1 Independent Desk Review of Self-Assessment

Participants in The Copper Mark: The Copper Mark appoints an Independent Reviewer(s) to review the Participant's Self-Assessments and make a recommendation to inform The Copper Mark's decision on the scope of the Independent Site Assessment, carried out in the second part of Step 3.

The Independent Reviewer will look at the Participant's self-assessment, supporting documentation, independent third-party assurance reports, and publicly available information. An iterative process, the reviewer may request additional information from the Participant.

The Reviewer will conduct the following activities:

1. Completeness: check supporting documentation for evidence of policies and procedures that support the performance determination in the Self-Assessment against The Copper Mark Criteria.
2. 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 3.8 below on Equivalence). The Independent Reviewer will assess the evidence submitted to confirm that
 - a. The assurance or certificate is in effect or valid at the time of the Independent Review.
 - b. The assurance or certificate is no more than 24 months old or plans for re-assessment or re-certification are underway and communicated to The Copper Mark.

- c. The assurance or certificate is valid for at least 12 additional months following the Independent Review or plans for reassessment or recertification are underway and communicated to The Copper Mark.
 - d. The assurance or certificate covers the same scope as the site participating in The Copper Mark, including operations, locations, and materials.
 - e. Improvement plans are in place to close any non-conformances within the next 12 months.
3. Due Diligence: the Independent Reviewer will conduct background research on the Participant 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 are reviewed, and information yielded is reviewed for relevance to the Participant's site. This review will be shared with The Copper Mark Assessors to inform the assessor's plans and preparation for the visit.

The Independent Desk Review of Self-Assessment is an iterative process. The first draft is provided to the Participant within **10 business days** of submission of the self-assessment. After each round of review by the Participant, the Independent Reviewer will return the next iteration of the report within **5 business days**.

The decision on the scope of the independent site assessment will be made by the Copper Mark within **ten business days** of receiving the final report from the Independent Reviewer and will be documented.

Sites assessed only against the Joint Due Diligence Standard: The independent review is not applicable.

3.3.2 Independent Site Assessment

An independent site assessment is required for all sites that use The Copper Mark Assurance Process. All criteria of Copper Mark standards are in scope unless The Copper Mark confirms that that criterion is:

1. Not applicable
2. Fully met through an equivalent site assessment and there are no potential issues raised through due diligence for that criterion
3. Partially met through an equivalent site assessment in which case only the areas that were not previously assessed onsite are in scope

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

Participants in The Copper Mark: The results of the assessment will provide The Copper Mark with a sufficient level of confidence to decide whether to award The Copper Mark to the Participant, authorizing the Participant to make Copper Mark claims and use The Copper Mark logo.

Sites assessed only against the Joint Due Diligence Standard: The results of the assessment will provide The Copper Mark with a sufficient level of confidence to support a determination of performance with the Joint Due Diligence Standard. The site may use the determination to support customer, regulatory, and government requirements as appropriate.

3.3.3 Site Assessment

Only Assessors that have been approved by The Copper Mark as having met The Copper Mark requirements for Assessors – listed and defined in Section 4 - can undertake site assessments. Independent Reviewers can be Assessors if they meet the requirements in Section 4.

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

The Copper Mark will distinguish Assessors or Assessment Firms that are only approved for certain standards, geographies, types of operations, or subject-matter expertise.

3.3.4 Site Assessment – Copper Mark Assessor

Copper Mark Assessors must use the applicable Copper Mark standard(s) to complete the Independent Site Assessment. For The Copper Mark Criteria, assessors must also consider the RRA-Copper Mark Criteria Guide when conducting the assessment.

Assessments must be conducted in accordance with ISO 19011 Guidelines for Auditing Management Systems or ISAE 3000 International Standard on Assurance Engagements. Under ISAE 3000, The Copper Mark accepts reasonable assurance only. Regardless of the methodology used, the process to conduct the site assessment must include:

- Planning and preparation: The Copper Mark Assessor will 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 and worker interviews
 - Document review

- Direct observations of the site operations, buildings and grounds
- 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. 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 1: Site Assessment Report Format). When conducting an assessment that includes a choke point as defined in the Joint Due Diligence Standard, the assessor must also complete and submit the Joint Due Diligence Tool. This applies for all assessments against the Joint Due Diligence Standard and for Criteria 31 for applicable sites.

Interviews are an integral part of the Independent Site Assessment. The pool of interviewees should span across functions, gender, age groups, ethnicity, and other factors to ensure a fair representation of workers. The assessor must define the sampling methodology in the report.

Interviews must be conducted in a way that instills trust and confidence in the interviewee. For example, interviews should be done apart from company representatives, in local language, and in a culturally sensitive manner. Assessors must notify the Copper Mark of any potential incidences of coaching or coercion.

The Copper Mark Assurance Process requires Assessors to take a risk-based approach to gather and analyze information systematically on a site performance against the applicable Copper Mark standard(s) to optimize efficiency and reduce the compliance burden for sites. 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 site operates;
- Control risks – the management systems the site has in place and the voluntary initiatives and responsible practices which the site is active in or follows; and
- Detection risks – the likelihood that the assessment methodology will identify non-conformances where they exist.

Assessors are expected to understand the site’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 Copper Mark standards.

Assessors are not expected to review equivalency determinations during the site assessment, but are expected to bring to the attention of The Copper Mark and include

in their report any areas of non-conformance observed, even if equivalent conformance was determined during the review by the Independent Reviewer. The Copper Mark will engage the site and, where possible, the equivalent standard owner, to resolve conflicting evidence or assessment conclusions. Sites may also use The Copper Mark Grievance Mechanism to resolve disputes.

The Assessor will draft their report within **10 business days** of completing the site assessment. The Assessor will submit the draft Site Assessment Report to The Copper Mark and the site. The Copper Mark, site and assessor engage in an iterative process to finalize the report. The site is requested to comment on factual accuracy and not to dispute the findings in this review.

The Copper Mark will review the independent Assessor's report and make a decision within **ten business days** of receiving the final report on whether the site has met the requirements of the applicable Copper Mark standard(s). The decision will be documented. The Copper Mark will provide a letter to the site with:

- The performance determination;
- Details of the non-conformances identified;
- The date by which the improvement plan is required to be submitted;
- The date for which implementation of the improvement plan is required; and
- The frequency and requirements for the check-in on implementation of the improvement plan.

3.3.5 Remote Assessments

In principle, remote assessments are not accepted in The Copper Mark Assurance Process.

A remote assessment is an offsite assessment where the assessor or assessment team are not physically present at the facility. The scope of the assessment is the same as an on-site assessment. A remote assessment is a "virtual assessment," which utilizes technology to visually review components of the assessment that are normally observed in-person. The remote assessment should be differentiated from a desk-top assessment, which only reviews the documents and records of a site.

In some rare instances, due to exceptional circumstances, The Copper Mark may consider remote assessments for a Participant for some criteria. This is determined on a case-by-case basis after a review of all available information.

3.3.6 Observers to the Site Assessments

The Copper Mark, assessor, or site may request to have an additional party attend the independent site assessment, for example:

1. Interpreters or translators who help with local-language interviews or document review.

2. Observers from The Copper Mark staff.

Other observers, for example trainee assessors, or representatives from external organizations, may also be requested to attend but may only do so with the express consent of the site.

Observers may not interfere with the assessment or the assessor's determination. Observers are subject to all policies and procedures of The Copper Mark, the site, and the assessor or assessment firm.

With the exception of Copper Mark staff, the assessor has the right to exclude observers from interviews with workers, contractors and stakeholders.

Observers may be required to sign a confidentiality agreement at the request of the site, the Assessor and / or The Copper Mark.

The Copper Mark and the site must be notified of all observers at least **ten business days** prior to the Site Assessment to obtain consent and ensure they have agreed to all relevant policies and procedures.

3.3.7 Assessment Outcomes

Sites for which all criteria are “fully meets” shall proceed to Step 5.

Sites for which one or more criteria are “does not meet” or “partially meets” must proceed to Step 4.

Participants in the Copper Mark: Sites that successfully complete the Assurance Process and for which all criteria are found “fully meets” or with a commitment to address any “partially meets” are awarded the Copper Mark. These sites are able to make The Copper Mark claims and use The Copper Mark logos to convey their commitment to meet industry sustainability standards in their production practices.

Sites for which one or more criteria are “does not meet” are not awarded the Copper Mark.

Sites assessed only against the Joint Due Diligence Standard: Sites that complete the Assurance Process are able to communicate the assessment result (“fully meets,” “partially meets” or “does not meet”) to demonstrate the level of conformance with the Joint Due Diligence Standard using the Assessment Report and / or referencing the Summary Assessment Report on the Copper Mark website. Sites may use the statement of conformance to support customer, regulatory, and government requirements as appropriate. For avoidance of doubt, the statement of conformance assures that the site has a mineral supply chain due diligence management system that aligns with the OECD 5-Step Framework.

Sites using only the Joint Due Diligence Standard are not Participants in The Copper Mark and are not eligible to use The Copper Mark logo or make claims. For further information please refer to The Copper Mark Claims Guide.

3.4 Step 4: Improvement Plan

Activity	Participants in The Copper Mark	Other eligible sites
Step 4: Improvement Plan	X	X

If a site has not fully met all the requirements of the applicable criteria within the Copper Mark standard(s), the site will develop an Improvement Plan to address the gaps in performance.

The implementation of the improvement plan must be independently assessed, though it does not need to be carried out by the same assessor(s). 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 may be desk-based or a site assessment depending on the improvements to be assessed.

3.4.1 Timelines for Implementing Improvement Plans

Participants in the Copper Mark: the assessment of the implementation of the improvement plan must be within **12 months** of the site assessment. Within **24 months** of the Commencement Date, the Participant will have to demonstrate and be independently assessed as fully meeting the Copper Mark Criteria.

Sites assessed only against the Joint Due Diligence Standard: the site will have to demonstrate and be independently assessed as fully meeting the Joint Due Diligence Standard within **12 months** of the Commencement date. The assessment of the implementation of the improvement plan must be scheduled to meet this timeline.

3.4.2 Types of Improvement Plans

There are two types of improvement plans implemented by sites using The Copper Mark Assurance Process:

- **Copper Mark Independent Assessments:** this refers to improvement plans resulting from a non-conformance identified during a Copper Mark Independent Assessment. For every criterion that is deemed “partially meets” or “does not meet” by the Assessor, the Participant must develop and implement an improvement plan.
- **Equivalent Systems:** this refers to improvement plans resulting from a non-conformance identified through an equivalent system. The site may use the independent assessment process as well as the reporting format of the equivalent system to demonstrate implementation. The Copper Mark monitors the progress to ensure adherence to the Assurance Process timelines.

3.4.3 Submitting the Improvement Plan

Depending on the type of improvement, the site will submit the improvement plan to the Copper Mark as follows:

Participants in The Copper Mark:

Copper Mark Independent Assessment: after the Independent Assessment has been completed and within **20 business days** of receiving the final assessment report.

Equivalent Systems: improvement plans in this path must be submitted during Step 2 of the Assurance Process: Self-Assessment.

In Step 3, the Independent Reviewer looks at the improvement plan as part of the review for equivalence: “Corrective action plans are in place to close any non-conformances within the next 12 months.”

The Independent Reviewer will note these non-conformances and the corrective action / improvement plans in the Independent Review Report.

Sites assessed only against the Joint Due Diligence Standard:

Copper Mark Independent Assessment: after the Independent Assessment has been completed and in within **20 business days** of receiving the final assessment report.

Equivalent Systems: during Step 1 of the Assurance Process: Commitment, jointly with the Pre-Assessment Questionnaire and equivalent system reports.

The Copper Mark looks at the improvement plan in Step 1 as part of the review for equivalence: “Corrective action plans are in place to close any non-conformance within the next 12 months.”

The Copper Mark will share the improvement plans with the Copper Mark assessor to inform the scope of the site assessment.

3.4.4 Monitoring

The Copper Mark will record each non-conformance, relevant system, improvement plans, and date the assurance of the implementation of the improvement plan is due.

On a quarterly basis, The Copper Mark will check-in with sites to assess progress and identify challenges / gaps in implementing improvement measures before deadlines expire. The Copper Mark will keep a record of the response until the improvement plan has been independently assessed as successfully implemented.

For equivalent systems, if it becomes clear that the site is not implementing an improvement plan within that system’s process, The Copper Mark may:

- Require the site to have the implementation of the improvement plan assessed through an independent desktop review and included in the next independent site assessment conducted through the equivalent system.
- Require the site to have the implementation of the improvement plan assessed by a Copper Mark assessor using this Assurance Process.

3.4.5 Outcomes from the Independent Assessment of the Implementation of Improvement Plans

Participants in The Copper Mark: sites who are “fully meets” for all criteria within **24 months** of the Commencement Date may continue to carry The Copper Mark.

Participants who had one or more criteria identified as “does not meet” in the independent assessment and who are not “fully meets” with all criteria within 24 months of the Commencement Date will not be awarded The Copper Mark.

For Participants that were awarded the Copper Mark after Step 3 but have not independently verified implementation of the improvement plan to demonstrate all criteria as “fully meets” within 24 months, The Copper Mark may take one of the following steps:

- Suspend the Participant
 - The Participant may no longer use The Copper Mark logo and claims where the independent assessment had identified “partially meets” for one or more criteria.
 - The Copper Mark will note the suspension on the website, indicating the reason for suspension.
- Remove The Copper Mark

Participants that were not awarded the Copper Mark after step 3 and have no independently verified implementation of the improvement plan to demonstrate all criteria as “fully meets” within 24 months will not be awarded The Copper Mark.

Sites assessed only against the Joint Due Diligence Standard: sites who are “fully meets” for all criteria within **12 months** of the Commencement Date may communicate their statement of conformance with the Joint Due Diligence Standard.

Sites who do not meet this expectation will be removed from the Copper Mark Assurance Process.

In exceptional circumstances, The Copper Mark may allow for more than the defined timeframe for the site to implement all required improvement measures to become “fully meets” with all applicable criteria. A longer timeframe will be reviewed on a case-by-case basis and extensions can only be granted if the Participant is able to provide evidence that the required improvement measures cannot reasonably be implemented within the given timeframe. In this case, a reasonable timeframe is agreed between the site and The Copper Mark before results are communicated.

3.5 Step 5: Re-Assessment

Activity	Participants in The Copper Mark	Other eligible sites
----------	---------------------------------	----------------------

Step 5: Re-assessment	X	X
------------------------------	---	---

Sites must demonstrate continued conformance through a full re-assessment (Step 5) **every three years**. All sites are required to complete Step 1 again before the three-years expire.

The three years are triggered from the following dates:

- The date of the Letter of Award for a participant that has received the Copper Mark either for having fully or partially met all applicable criteria.
- The date of the decision that a participant has not received the Copper Mark and must first complete Step 4.
- The date of the conformance determination for sites assessed only against the Joint Due Diligence Standard.

A full or limited re-assessment of a site 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 site is obliged to inform The Copper Mark. The Copper Mark reserves the right to require that the site completes Steps 2 through 4 as appropriate even when doing so falls before the mandated three-year re-assessment cycle.

Significant changes or events may include:

- A significant change of a site operationally or through acquisition (e.g., suspension, change in mining methods, move to care and maintenance);
- 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 grievance lodged against the site in accordance with The Copper Mark Grievance Mechanism that may indicate non-conformance against any of the criteria in Copper Mark standards (for more information on grievances, see [The Copper Mark Grievance Mechanism](#));
- A change of input from 100% recycled material to include mined material; and
- A change in sourcing practices or circumstances that triggers the site to confirm “red flags.”¹

Participants in The Copper Mark: additional significant changes or events to the above may include:

- A significant environmental incident resulting in significant negative environmental impacts²; or

¹ As defined in the [Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc](#).

² Significant negative environmental impacts include but are not limited to: negative impacts from air emissions, releases to surface water or groundwater that exceed permit allowances; non-treatment or

- A significant industrial accident or incident resulting in one or more fatalities; or
- A significant incident resulting in significant negative impact on human rights.

Sites are required to annually submit a link to their public “Step 5” report as part of Criterion 31 of the Copper Mark Criteria and the Joint Due Diligence Standard as well as confirm whether there are any significant changes or events as defined above, should there have been any.

Sites must also 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 site can demonstrate they are in the process of or have applied for re-certification. If equivalent certifications are used, sites are required to inform The Copper Mark when they expire and to either provide a timeline, new certificate or notify The Copper Mark for the need of an assessment.

Failure to submit the above may also trigger a re-assessment sooner than the three-year cycle.

3.6 Equivalence

The Copper Mark acknowledges that a site may have undergone third-party audits or assessments as part of their involvement in other sustainability standards or certification systems covering operating areas and practices comparable to those covered by Copper Mark standards.

A core principle of The Copper Mark is to recognize as “equivalent” other sustainability systems, good practice frameworks and certifications where they are materially comparable in scope and intent to Copper Mark standards and Assurance Process. Sites may wish to claim that one or more of Copper Mark standard(s) criteria have already been independently assessed by a third-party through an equivalent system. Detailed information is available in [The Copper Mark Recognition Process](#).

3.6.1 Equivalence Recognition

Equivalence is not automatically granted. Where a site uses an equivalent system, evidence must be provided to The Copper Mark to demonstrate that the assurance or certificate is in effect or valid, no more than 24 months old and covers the same scope as the assessment of the site using The Copper Mark Assurance Process.

Participants in The Copper Mark: The Copper Mark maintains a comparative analysis of the requirements of several standard systems and certifications in the form of a standards’ “equivalence matrix.” The RRA-Copper Mark Equivalence Matrix is published

improper disposal of hazardous or non-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.

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 and certifications that are not included in the matrix, Participants should submit a request to The Copper Mark 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 have their conformance with existing systems recognized by The Copper Mark, Participants must submit evidence of independent assessments during Step 2 in accordance with the requirements laid out in Section 3.4. This information will be reviewed by the Independent Reviewer in accordance with Section 3.5.1.

The Independent Reviewer will determine whether the criterion should be designated as partially or fully meets based on the conclusions and scope of the equivalent standard system. Where the criterion is reviewed as fully covered by the assessment of the equivalent system, The Copper Mark may exclude it from the scope of the Independent Site Assessment and the criterion does not need to be re-assessed.

Where the criterion is partially covered by the equivalent standard system, the areas that were not previously assessed onsite are in scope of the Independent Site Assessment.

Where potential issues are identified through the due diligence process of the Independent Desk Review of Self-Assessment, regardless of whether the criterion is fully or partially met through equivalence, The Copper Mark may include the criterion in the scope of the Independent Site Assessment.

Sites assessed only against the Joint Due Diligence Standard: Sites may submit a request for recognition including the full equivalent system assessment report and any improvement plans in Step 1 of the Assurance Process. The Copper Mark will review the request and accompanying evidence. Where the Copper Mark determines there is equivalence, the Copper Mark may adapt the scope of the Independent Site Assessment accordingly.

3.6.2 Additional Information

Certain standards may require additional information to demonstrate the equivalent system fully covers the scope of the specified Copper Mark standard's criteria and / or of this Assurance Process. The list and associated requirements and assurance expectations is regularly updated by the Copper Mark.

3.6.3 Add-On Assessments

Where the site has an upcoming independent assessment under an external system that is recognized by The Copper Mark, it is possible that a Copper Mark "add-on" can be incorporated to "top-up" the scope of the external assessment to include criteria of Copper Mark standards and / or assurance process that are not covered by the system.

This may be determined by the site in consultation with The Copper Mark and the assigned Assessor(s). The Assessor(s) would have to be approved by The Copper Mark. The Copper Mark develops on-going guidance to support “top-up” assessments with equivalent systems.

4 Assessor Selection and Evaluation

4.1 Selection

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

<p>Objectivity</p>	<p>Assessors must be independent⁴ of the company 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 site within the last three (3) years.</p> <p>Assessors must disclose any business or financial relationship with or financial interest in the Participant or entities in its supply chain within the scope of the assessment. Potential conflicts of interest will be evaluated by The Copper Mark.</p> <p>Assessors cannot have provided any consulting services to the Participant 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 Management 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 in accordance with the OECD Due Diligence Guidance; • 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>

Assessors who apply for approval to assess the Joint Due Diligence Standard only must meet all of the requirements with the exception of section on expertise. In this case, assessors shall demonstrate knowledge, understanding, and at least five (5) years working experience in the auditing of **mineral supply chain due diligence in accordance with the OECD due diligence guidance** in mining, smelting or refining.

The Copper Mark 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

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

records; and results of The Copper Mark observations, including any pending improvement actions (see 4.3 Evaluation).

4.2 Training

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

4.3 Evaluation

The Copper Mark will review and monitor the ability of Assessors to carry out assessments in accordance with The Copper Mark requirements, based on the objectives and scope of the assessment and judged against assessment records. This process is detailed in [The Copper Mark Assessor Management Procedure](#).

5 Reporting

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

- Review the report and confirm that the assessment process and findings are consistent with the instructions in The Copper Mark Assurance Process and Copper Mark standards; and
- Document the scope and relevant details about the site including the name and geographic location of the site, the date conformance becomes effective and expires, and when re-assessment is due.

Participants in The Copper Mark: The Copper Mark will:

- Issue formal documentation and information to the Participant, including The Copper Mark Brand Guidelines that contains information on:
 - Available Copper Mark Producer logo formats;
 - Minimum size of logos;
 - Colours and permitted adaptations;
 - Background colours;
 - Exclusion zone;
 - Visual examples of acceptable and incorrect uses of logo placement, size, colour, etc.
- List the Participant on The Copper Mark website. A summary report using The Copper Mark's template 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;
 - Date of the assessment activities and the assessment period;
 - Assessment activities and methodology, including sampling methodology;
 - Any recognized equivalent systems
 - Assessment conclusions for each criteria;
 - For Criterion 31, the conformance determination for each of the five steps of the OECD as detailed in the Joint Due Diligence Standard;
 - Statement of conformance; and
 - Any non-applicable Copper Mark Criteria.

Sites that are assessed against the Joint Due Diligence Standard: The Copper Mark will list the site on the website along with a summary report using The Copper Mark's template that will include at a minimum:

- The name of the site;
- The type of production facility;
- The date of the performance determination and its expiry date;
- Date of the assessment activities and the assessment period;
- Assessment activities and methodology, including sampling methodology;
- Conformance determination for each of the five steps of the Joint Due Diligence Standard; and
- Statement of conformance.

Other data obtained through the assurance process, surveys or other ways may be published by the Copper Mark in aggregated form for the purpose of its annual, impact or grievance reports, with due respect of anti-trust laws.

6 Data Confidentiality

The Copper Mark will access information about sites provided in:

- The Letter of Commitment (including Annexes) or the Pre-Assessment Questionnaire for the purposes of becoming a site that participates in The Copper Mark or is assessed against the Joint Due Diligence Standard;
- Completed self-assessments;
- Assessment reports for the purposes of assessment; and,
- Continuous improvement plans.

The Copper Mark will sign an agreement with sites, including confidentiality clauses, that encompass the Independent Reviewers. Sites are recommended to sign confidentiality agreements directly with their chosen Copper Mark assessor(s).

7 Grievance Mechanism

As an independent assurance system, The Copper Mark has a [Grievance Mechanism](#) to process:

Grievances against the Copper Mark. Grievances about the implementation of the Copper Mark’s policies, procedures and operating processes for which its management and board of directors has direct governance responsibility.

Grievances against a site assessed using the Copper Mark Assurance Process. Grievances against a site which does not conform with or follow the guidance of all applicable Copper Mark policies, procedures and documents. The objective of the Grievance Mechanism is to ensure that grievances raised with the Copper Mark are handled in a timely, comprehensive, consistent, transparent, and effective manner. It is intended to allow Copper Mark stakeholders to raise concerns, have these investigated and provide a remedy, in particular where rights are violated.

8 Program Communication and Evaluation

8.1 Communication

The Copper Mark 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 will review and, as necessary, update its assurance process, requirements, and guidance for sites and Assessors. The Copper Mark 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 sites and other stakeholders.

9 Glossary

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 and contracted by a Participant 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)	A system of control and transparency, specifically, the documented record of the sequence of companies and individuals that have custody of minerals as they move through a supply chain. ⁶
Company	A legal entity formed by an individual or group of individuals or companies to engage in and operate a business. For the purpose of this Standard, the term is used to indicate any business and ownership structure including a partnership, proprietorship, or corporation, or co-operative. A company may engage in and operate one or multiple sites.
Commencement Date	The date the required agreements are signed by both parties. In this document, the Commencement Date triggers the adherence to the Assurance Process.
The Copper Mark	The trading name of the U.K incorporated not-for-profit company that owns and governs the trademark-protected certification mark and logo also known as "The Copper Mark."

⁶ Adapted from OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris. Pag. 65.

Copper Mark Criteria for Responsible Production (Copper Mark Criteria)	The Copper Mark uses the Risk Readiness Assessment (RRA) as the basis for evaluating Participants' 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 Mark-Related Claim	A claim or representation that is public-facing or used in business to business (B2B) communications, is documented, and consists of one or more of: Use of a Copper Mark logo and / or Text relating to The Copper Mark Assurance Process, which may be alongside The Copper Mark logo, or standalone. This covers Copper Mark Assurance Claims and Copper Mark Marketing Claims.
Copper Mark standards	The Copper Mark Criteria for Responsible Production (Copper Mark Criteria).. The Copper Mark uses the Risk Read Assessment (RRA) of the Responsible Minerals Initiative (RMI) as the basis for evaluating Participants' performance, including the RRA-Copper Mark Criteria Guide of February 2020. AND The Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of February 2021.
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	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 metal production.
Independent Reviewer	An independent service provider or individual (third party) that is approved by The Copper Mark and contracted by The Copper Mark to review Participants' Copper Mark criteria self-assessments. An Independent Reviewer can also be a Copper Mark Assessor.
Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc	The joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (the Standard) was established by The Copper Mark, the International Lead Association (ILA), the Nickel Institute (NI), the International Zinc Association (IZA) and the Responsible Minerals Initiative (RMI) to enable responsible global supply chain management in the copper, lead, nickel and zinc industries. The Standard is available on The Copper Mark website here .

Participant	A site of a copper producer that is participating in the Copper Mark. The most up-to-date list is available on the website here .
Performance Determination	Level of performance assigned to each risk area based on whether the Participant company’s practices ‘does not meet’, ‘partially meets’, or ‘meets’ The Copper Mark Criteria (see the Criteria Guide for further detail).
Remote Assessment	A remote assessment is an offsite assessment where the assessor or assessment team are not physically present at the facility. The scope of the assessment is the same as an on-site assessment. A remote assessment is a “virtual assessment,” which utilizes technology to visually review components of the assessment that are normally observed in-person. The remote assessment should be differentiated from a desk-top assessment, which only reviews the documents and records of a site.
Site	<p>Operations involved in the mining, refining, or other intermediary steps for copper, lead, nickel, or zinc production, including, but not limited to, mining, solvent extraction and electrowinning (SX/EW), concentration, blending, washing, roasting, smelting, alloying or refining. 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.</p> <p>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 metal production. A company may engage in or operate one or multiple mining sites and/or facilities.</p>

10 Annex 1: Site Assessment Report Format

At minimum, the Site Assessment report should include:

- Site information;
- Standard(s) applied;
- Assessor information;
- Assessment data including:
 - Assessment dates;
 - Assessment period;
 - Agenda;
- Applicable 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 of the Copper Mark standard(s) criteria;
- Description of performance determination for each of the Copper Mark standard(s) criteria;
- Continuous improvement plan, if applicable and already developed;
- List of documents reviewed; and
- Number and type of interviewees by stakeholder category (management, employees, contractors, communities, NGOs, government officials, etc.).