



The Copper Mark Claims Guide

V2.0 – May 2021

Revision Date:	Publication Date:	Organization:
6 May 2021	6 May 2021	The Copper Mark
Title:		Type:
The Copper Mark Claims Guide		Public

The Copper Mark Claims Guide

Document owner	The Copper Mark
Date	19 th March 2020
Version	1

The Copper Mark has developed the first and only comprehensive social and environmental assurance process for copper production and fabrication.

The vision of The Copper Mark is for copper supply chain actors with The Copper Mark to be recognized by their employees, neighbors, customers, investors and civil society as having adopted internationally accepted responsible operating practices and making significant contributions to the UN Sustainable Development Goals.

The Copper Mark is 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”.

The Copper Mark provides an assurance framework to demonstrate the copper industry’s responsible production practices and industry contribution to the United Nations SDGs.

General Enquiries

The Copper Mark welcomes questions and comments on this document.

Email: info@coppermark.org

Website: www.coppermark.org

Disclaimer

This document does not intend to, nor does it, replace, contravene or otherwise alter the requirements of The Copper Mark Articles of Association or any applicable national, state or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein. The Copper Mark documents are updated from time to time.

Table of Contents

1. Introduction	3
The Copper Mark and The Copper Mark-related claims	3
Purpose of this Guide	3
Applicability of this Guide	4
Legal Compliance	5
2. General Requirements for all The Copper Mark-Related Claims	5
General.....	5
Logo Use Requirements.....	6
3. Types of Claims	6
Assured Claims	6
Marketing Claims	6
Chain of Custody Claims	7
Types of Claims Permitted and Prohibited by The Copper Mark.....	7
4. The Copper Mark-related claims	7
The Copper Mark Producer Assurance Claims	7
The Copper Mark Producer Marketing Claims	12
The Copper Mark Partner Claims	13
General Supporter Claims.....	15
Approvals for Claims	16
Fees for Use of Claims	16
5. Monitoring and Enforcement.....	17
Monitoring Use of Claims	17
Identified Misuse of The Copper Mark-Related Claims	17
6. Related The Copper Mark Information and Documents	19
7. Review of this Guide.....	19
8. Contact The Copper Mark.....	19
9. Glossary.....	19
10. References	20

1. Introduction

The Copper Mark and The Copper Mark-related claims

The Copper Mark enables organizations to make claims to differentiate their business by their commitment to implementing responsible production practices and to contributing to sustainable development or by showing support for the objectives of The Copper Mark and The Copper Mark Assurance Process.

A The Copper Mark-related claim is 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 The Copper Mark logo.
- Text relating to The Copper Mark Assurance Process, which may be alongside The Copper Mark logo, or standalone.

Consistent, accurate and appropriate use of terms related to The Copper Mark Assurance Process and use of The Copper Mark logo helps to build awareness, recognition and credibility. It is essential that claims not be inaccurate or misleading. Claims that appear absolute or imply performance levels beyond what is actually required or assured by The Copper Mark Assurance Process may result in accusations of 'greenwashing'. Claims that imply a formal association with The Copper Mark where none exists might mislead business or the general public and expose users to legal recourse.

The Copper Mark controls all relevant The Copper Mark-related claims to ensure they are both credible and accurate. This means that The Copper Mark must grant permission for any use of The Copper Mark-related claims prior to their being made unless stipulated otherwise in this Guide. The Copper Mark reserves the right to act on any use of its name or logo that it believes to be inappropriate.

There are different types of claim and differing relevance to Copper Producers in The Copper Mark Assurance Process, The Copper Mark partners and general supporters of The Copper Mark. This Guide provides both principles and practical examples of how Copper Producers, Partners and Supporters of The Copper Mark may make claims.

Any other site that uses the Assurance Process but is not a Participant in the Copper Mark is not eligible to make any claims. This includes any site that is assessed only against the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc.

Purpose of this Guide

The purpose of The Copper Mark Claims Guide is to set out the rules and supporting guidance for different The Copper Mark-related claims. Specifically, this Guide gives instruction on:

- Types of claims permitted and prohibited by The Copper Mark (Assured, Marketing, and Chain of Custody claims).
- Claims related to assurance against The Copper Mark Criteria (The Copper Mark Producer Assurance Claims)
- Marketing claims made by Copper Producers (The Copper Mark Producer Marketing Claims)
- Claims made by The Copper Mark Partners (The Copper Mark Partner Claims)
- Claims made by The Copper Mark Supporters (General Supporter Claims)
- Monitoring and enforcement

Applicability of this Guide

The Guide must be used by anyone making The Copper Mark-related claims. It is publicly available to assist other stakeholders in their understanding of The Copper Mark-related claims. There are three general categories of organizations that might choose to make a The Copper Mark-related claim:

- **Sites of a Copper Producer** – 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. Such entities might produce other metals as well as copper. Included in the copper supply chain are multi-metal producers that produce gold, silver, nickel, cobalt, lead, molybdenum and zinc, alongside copper.

A Participant is assessed against all 32 Copper Mark Criteria. Only Participants are eligible to make Copper Mark Claims in accordance with [The Copper Mark Claims Guide](#). 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.

Copper Producers can make Assurance Claims and Marketing Claims (see Section 4). To be eligible to make The Copper Mark-related claims, Copper Producers must have signed a Letter of Commitment with The Copper Mark confirming their participation in The Copper Mark Assurance Process (see Section 4.1).

Parent companies of operating sites and/or facilities, and joint venture partners are also eligible to make claims about Copper Producers in which they have an interest. **All claims must be clearly linked with the specific Copper Producer's site and/or facility that has fulfilled the requirements of The Copper Mark Assurance Process.**

Copper Producers cannot be The Copper Mark Partners or General Supporters or make claims associated with these two categories.

Sites that use the Copper Mark Assurance Process but are not Participants **are not eligible to make any claims or use the logo.**

- **The Copper Mark Partners** – organizations in the copper value chain that use, rely on or have an interest in copper or copper production in their business and that have made a public commitment to The Copper Mark’s vision and objectives and recognize the responsible production and sourcing of copper in their business policies and activities through expressing a preference for producers assured through The Copper Mark Assurance Process. Such organizations include, but are not limited to component and parts manufacturers using copper in their industrial processes; original equipment manufacturers using copper in their end-products; and investors and financial institutions with direct or indirect interests in copper production.
- **General Supporters** – organizations that are not part of the copper value chain, and thus are not eligible to be a The Copper Mark Partner or Copper Producer but wish to express their support for The Copper Mark’s vision and objectives. Such organizations include, but are not limited to, organizations with social or environmental missions, community groups, trade unions, governmental organizations, trade associations, standards bodies, The Copper Mark-approved assessors, and academic institutions.

Legal Compliance

Organizations that make The Copper Mark-related claims are each responsible for legal compliance with applicable regulations, including labelling, advertisement, consumer protection and competition laws, at all times. The Copper Mark cannot accept liability for any violations of applicable law, or any infringement of third-party rights made by other organizations.

2. General Requirements for all The Copper Mark-Related Claims

General

The following rules apply to general references to The Copper Mark:

- The Copper Mark must be referred to as ‘The Copper Mark’.
- The above names may not be translated into other languages without also retaining the English version/s for reference.
- The Copper Mark logo must never be displayed in such a way that is misleading or confusing or might lead to any harm or prejudice to the reputation or credibility of The Copper Mark.
- Associating The Copper Mark name or logo with a chain of custody linked to a product is prohibited¹.
- The use of The Copper Mark name or logo as, or as part of, another brand name is prohibited.

- The Copper Mark name or logo must not be placed in such a way that it could be interpreted as belonging to any company or organization other than The Copper Mark.
- The use of The Copper Mark name or logo alongside other sustainability/responsible sourcing logos, marks or seals is generally permitted.

Logo Use Requirements

The Copper Mark has developed Brand Guidelines that contains information on:

- Available The 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.

Please contact The Copper Mark at info@coppermark.org to request a copy of the Brand Guidelines or if you are unsure about how to place The Copper Mark logo in a particular situation.

3. Types of Claims

Assured Claims

An assured claim is a claim that can be made as a result of an assurance process against a responsible business code or standard. The Copper Mark allows assured claims by Copper Producers that have fulfilled the requirements of The Copper Mark Assurance Process against The Copper Mark Criteria. Such claims are known as The Copper Mark Assurance Claims, they include text claims and The Copper Mark logo, and their permitted use is further described in Section 4.1 of this Guide.

Marketing Claims

Marketing claims are claims that relate to corporate commitments or expressions of support relating to The Copper Mark, its mission, goals and to The Copper Mark Assurance Process, but that are not based on assurance against The Copper Mark Criteria. For example, marketing claims could include statements expressing an organization's general level of commitment or involvement in The Copper Mark's work program, support for responsible sourcing of copper, or an intention of a copper producer to work towards The Copper Mark Assurance. The Copper Mark Copper Producers (Section 4.2), The Copper Mark Partners (Section 4.3) and General Supporters (Section 4.4) can all make marketing claims. All such claims must be consistent with the general principles set out in Section 2 of this Guide

Chain of Custody Claims

Assurance against The Copper Mark Criteria (Section 4.1) relates to policies, procedures and practices implemented by the site and/or facility of the Copper Producer, and not to the copper product itself or to the flow of material through the copper supply chain. Claims related to the flow of material through the supply chain are required to have a chain of custody to provide a reasonable level of confidence in the provenance of the material. Although not currently included in the Assurance Process, The Copper Mark plans to introduce a chain of custody assurance enabling a verified tracking of copper material from copper producer to downstream users.

The Copper Mark does permit claims to appear on or to accompany copper products, for example on copper cathode bundles, where such a claim clearly identifies the copper site and/or facility as having met The Copper Mark requirements, rather than the copper itself. Examples of such claims is provided in Section 4.

Types of Claims Permitted and Prohibited by The Copper Mark

Types of Claims Permitted and Prohibited by User Category

User Category	Assured	Marketing	Chain of Custody
Copper Producers	✓	✓	✗
The Copper Mark Partners	✗	✓	✗
General Supporters	✗	✓	✗

4. The Copper Mark-related claims

The Copper Mark Producer Assurance Claims

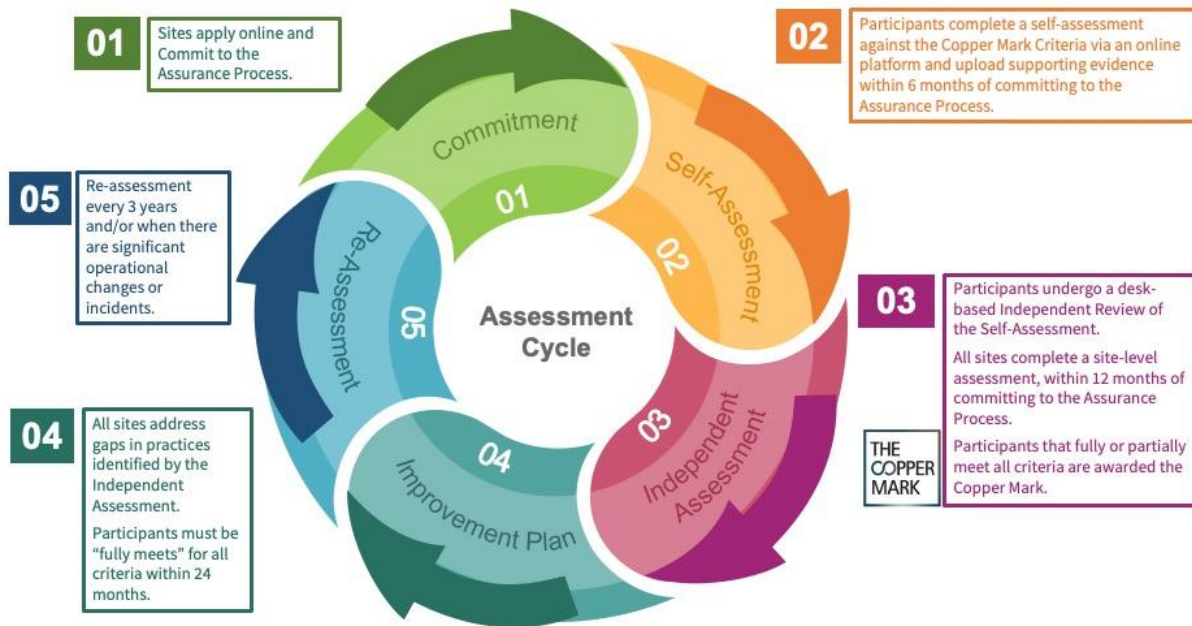
A The Copper Mark Assurance Claim is an assured claim that conveys information about responsible practices of a particular copper producer as defined in The Copper Mark Criteria. Only Copper Producers that have implemented policies and practices independently assessed as conforming with The Copper Mark Criteria and that follow The Copper Mark Assurance Process are eligible to make The Copper Mark Assurance Claims.

There are 5 steps in The Copper Mark Assurance Process, which are illustrated in Figure 1. Copper Producers participating in The Copper Mark Assurance Process may make The Copper

Mark Assurance claims only when they have been independently assessed as having met the requirements for each specific steps.

The Copper Mark Criteria Guide provides guidance to assessors on how to determine whether a criterion has been ‘missed’, ‘partially met’, or ‘fully met’.

The Copper Mark Assurance Process



To make a The Copper Mark Assurance claim, Copper Producers are required to be independently assessed as having ‘fully met’ or ‘partially met’ the 32 The 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).

To continue to make The Copper Mark Assurance claims beyond Step 3, Copper Producers must demonstrate and have independently assessed (Step 4) that they have implemented the necessary improvements to raise their performance determination in all issue areas of The Copper Mark Criteria from ‘partially meet’ to ‘fully meet’ within 24 months of signing the Letter of Commitment (Step 1).

To continue to make The Copper Mark Assurance claims beyond having been assessed as ‘fully meets’ all The Copper Mark Criteria (Step 4), Copper Producers must demonstrate

continued conformance through a re-assessment (Step 5) by independent The Copper Mark-approved assessors, or demonstrating conformance with recognized equivalent standards or certifications, every three years from being eligible to make their first The Copper Mark Assurance claim (Step 3).

A re-assessment of a Copper Producer can also be triggered sooner, as defined in The Copper Mark Assurance Process. Please refer to Section 5.2 of this Guide for more information on making claims in these circumstances.

Copper Producers may make The Copper Mark Assurance Claims to customers, suppliers, consumers, media organizations and stakeholders generally and claims can be displayed in corporate material, contracts, invoices, web site and signage.

In addition to the requirements stipulated in 2.1 of this Guide, Copper Producers eligible to make The Copper Mark Assurance Claims must never display The Copper Mark logo or write associated text in such a way that suggest or implies:

- participation in The Copper Mark Assurance Process before Step 3 has been completed.
- a larger assessment scope of a Copper Producer in the Assurance Process than has been assessed following completion of Steps 3, 4 or 5.
- participation in The Copper Mark Assurance Process by an organization other than the specific site of the participating Copper Producer stipulated in the Letter of Commitment.

Please refer to the table below for specific text claims’ examples and logo use for The Copper Mark Assurance Claims.




The Copper Mark Assurance Claims		
Eligibility	Copper Producers	
Assurance Process Status	Step 3 & 4: Copper Producers independently assessed as having partially or fully met all 32 of The Copper Mark Criteria	
Claim Placement	Corporate reports (e.g. sustainability reports), promotional material, letter heads, contracts, invoices, web sites, cathode bundle labels, and site signage. All claims must be placed in such a way to be clearly linked with the specific Copper Producer’s site and/or facility that has fulfilled the requirements of The Copper Mark Assurance Process	
Example Text	Logo Permitted	Approval required from The Copper Mark



[North Mine], a The Copper Mark Producer since 2020, has been independently assessed against The Copper Mark Criteria		YES
As part of The Copper Mark Assurance Process – [North Mine] has been independently assessed as having partially/fully met The Copper Mark Criteria		YES
[North Mine] is an assured The Copper Mark Producer		YES
[North Mine]: a The Copper Mark Producer		YES
[North Mine]: The Copper Mark Assured		YES
[Polly Metal North], a producer of copper, nickel, lead, silver and zinc, has been independently assessed against The Copper Mark Criteria		YES
[Polly Metal North], a producer of copper, nickel, lead, silver and zinc, is an assured The Copper Mark Producer		YES

Example of a Copper Cathode Bundle Label

		YES
--	--	-----

Eligibility	Parent Companies and Joint Venture Partners of Copper Producers
--------------------	---

Assurance Process Status	Step 3 & 4: Copper Producers independently assessed as having partially or fully met all 32 of The Copper Mark Criteria	
Claim Placement	Corporate reports (e.g. sustainability reports), promotional material, letter heads, and web sites. All claims must be placed in such a way to be clearly linked with the specific Copper Producer's site and/or facility that has fulfilled the requirements of The Copper Mark Assurance Process	
The [North Mine] of [MountainCopperCorp] has been independently assessed as having fully met the responsible environmental and social production practices' requirements of The Copper Mark.		YES
The [North Mine] of [MountainCopperCorp] has been independently assessed against and has partially met The Copper Mark Criteria and is committed to continuous improvement at the site to fully meet all 32 of The Copper Mark Criteria by [September 2022].		YES
[MontainCopperCorp] is proud to announce that its [North Mine] and [South Mine] have fulfilled the necessary requirements to be The Copper Mark Assured		YES

Eligibility	Copper Producers	
Assurance Process Status	Step 5: Copper Producers independently re-assessed as fully meeting all 32 of The Copper Mark Criteria	
Claim Placement	Corporate reports (e.g. sustainability reports), promotional material, letter heads, contracts, invoices, web sites, cathode bundle labels, and site signage. All claims must be placed in such a way to be clearly linked with the specific Copper Producer's site and/or facility that has fulfilled the requirements of The Copper Mark Assurance Process	
[North Mine], a The Copper Mark Producer since 2020, has been independently re-assessed as having met all 32 of The Copper Mark Criteria		YES
[North Mine] has successfully completed The Copper Mark Re-Assessment and remains a The Copper Mark-Assured producer.		YES

[North Mine]: a The Copper Mark Producer since 2020.		YES
--	--	-----

Eligibility	Parent Companies and Joint Venture Partners of Copper Producers	
Assurance Process Status	Step 5: Copper Producers independently re-assessed as fully meeting all 32 of The Copper Mark Criteria	
Claim Placement	Corporate reports (e.g. sustainability reports), promotional material, letter heads, and web sites. All claims must be placed in such a way to be clearly linked with the specific Copper Producer’s site and/or facility that has fulfilled the requirements of The Copper Mark Assurance Process	
[MountainCopperCorp’s North Mine], a The Copper Mark Producer since 2020, has been independently re-assessed as having met all 32 of The Copper Mark Criteria		YES
[MountainCopperCorp’s North Mine] has successfully completed The Copper Mark Re-Assessment and remains a The Copper Mark-Assured producer.		YES
[MountinCopperCorp] is proud of the production performance of its [North Mine], which has been a The Copper Mark Producer since 2020.		YES



The Copper Mark Producer Marketing Claims



Copper Producers that have signed a Letter of Commitment (Step 1) and/or have completed a self-assessment against The Copper Mark Criteria (Step 2) are not eligible to make The Copper Mark Assurance Claims but may make Marketing Claims to communicate that they have committed to meet The Copper Mark Criteria and are working towards achieving conformance within the period stipulated in The Copper Mark Assurance Process.

Additionally, Copper Producers may publish their Letter of Commitment and the link to the page on The Copper Mark website that list Copper Producers participating in The Copper Mark Assurance Process.

Please refer to the table below for example text claims and logo use for The Copper Mark Producer Marketing Claims.

The Copper Mark Producer Marketing Claims
--

Eligibility	Copper Producers	
Assurance Process Status	Steps 1 & 2: Copper Producers working towards independent assessment of meeting all 32 of The Copper Mark Criteria	
Claim Placement	Corporate material (e.g. sustainability reports), promotional material, web sites, letter heads, and signage.	
Example Text	Logo Permitted	Approval required from The Copper Mark
[North Mine] is committed to achieving independent assessment of The Copper Mark Criteria to support responsible practices of copper production.		NO
[North Mine] is working towards fully meeting all The Copper Mark Criteria by [May 2022] within [2] years of signing a Letter of Commitment.		NO

Eligibility	Parent Companies and Joint Venture Partners of Copper Producers working towards independent assessment of meeting all 32 of The Copper Mark Criteria	
Assurance Process Status	Not applicable	
Claim Placement	Corporate material (e.g. sustainability reports), promotional material, web sites and letter heads.	
Example Text	Logo Permitted	Approval required from The Copper Mark
[MountainCopperCorp] is proud to support its [North Mine] in meeting the environmental and social performance requirements of The Copper Mark by [March 2021]		NO
[MountainCopperCorp], a joint venture partner with [International Base Metals Inc.] in [North Mine] is proud to support the site's commitment to meet the requirements to become an assured The Copper Mark producer.		NO

The Copper Mark Partner Claims

The Copper Mark Partners are organizations in the copper value chain that use, rely on or have an interest in copper or copper production and include, but are not limited to, organizations in the copper fabricating, auto and electronics OEM, and construction sectors, and financial institutions investing in copper production. The Copper Mark encourages such organizations to make a commitment to The Copper Mark vision and objectives by recognising the responsible



production and sourcing of copper in their core business policies and activities. A The Copper Mark Partner Claim is different to a General Supporter Claim as it commits the organization to go beyond statements of general support by incorporating The Copper Mark into business decisions and resource allocation.


Examples of such commitments include the recognition by a manufacturing business of its suppliers' responsible production and sourcing of copper through expressing a preference for producers assured through The Copper Mark Assurance Process; an investor acknowledging that a The Copper Mark Assured Copper Producer meets its requirements for environmental, social and governance due diligence; or, by allocating the time and expertise of staff to actively serve on The Copper Mark Board of Directors or The Copper Mark Advisory Council.

Organizations wishing to be The Copper Mark Partners submit a formal request through The Copper Mark website that will include a statement of their commitment. The request will be reviewed by The Copper Mark and, if necessary, The Copper Mark may require amendments to the request before accepting the organization formally as a The Copper Mark Partner.

The Copper Mark Partners agree to have their name and logo placed on a dedicated web page on The Copper Mark website.



Please refer to the table below for specific The Copper Mark Partner text claims' examples and logo use.


The Copper Mark Partner Claims		
Eligibility	Organizations in the copper value chain that have made a formal commitment to The Copper Mark, which has been acknowledged by The Copper Mark	
Assurance Process Status	Not applicable	
Claim Placement	Corporate material (e.g. annual reports, sustainability reports), promotional material, web sites, letter heads, and signage.	
Example Text	Logo Permitted	Approval required from The Copper Mark
[Superfast Auto] is proud to be a partner to The Copper Mark and recognizes the credibility of The Copper Mark in its responsible sourcing policy and strategy		NO
[Smart Investing Capital] invests in copper mining operations that are committed to meet and to be independently assessed against the responsible environmental and social production practices' requirements of The Copper Mark.		NO

[Mrs. Yolanda Verde, CEO of the charity NatureSave] is proud to serve on the board of The Copper Mark and to advance its mission to recognize good production practices globally.		NO
---	--	----

General Supporter Claims

The Copper Mark encourages expressions of support and the promotion of The Copper Mark by consumers, communities, The Copper Mark-approved assessors, governmental organizations and other stakeholders. A General Supporter Claim is a statement of support for The Copper Mark that does not imply a direct relationship with producers participating in The Copper Mark Assurance Process, or any materials produced by them, or with The Copper Mark directly.

The Copper Mark General Supporter Claims		
Eligibility	Organizations that are not part of the copper value chain including those with a social or environmental mission, community groups, trade unions, governmental organizations, trade associations, standards bodies, and academic institutions	
Assurance Process Status	Not applicable	
Claim Placement	Corporate material (e.g. annual reports, sustainability reports), promotional material, web sites, letter heads, and signage.	
Example Text	Logo Permitted	Approval required from The Copper Mark
We, the [Xtappa Community of Indigenous Peoples], support copper mining operations that are committed to meet and to be independently assessed against the responsible environmental and social production practices' requirements of The Copper Mark Assurance Process.		NO
[Mountain and Valley Conservation Group] acknowledge The Copper Mark's role in advancing better environmental practices and support copper producers seeking assurance by The Copper Mark		NO
Eligibility	The Copper Mark-Approved Assessor	
Assurance Process Status	Not applicable	
Claim Placement	Corporate material (e.g. annual reports, sustainability reports), promotional material, web sites, letter heads, and signage.	

Example Text	Logo Permitted	Approval required from The Copper Mark
[Reliable Assessors Inc]. are proud to be approved The Copper Mark Assessors.		NO

Approvals for Claims

To use The Copper Mark logo and The Copper Mark-related claims, approval is required from The Copper Mark, unless otherwise specified in this Guide. For a claim to be approved, please submit requests, including the proposed text and logo use and placement, by email to info@coppermark.org using the form provided in Appendix A.

Under normal circumstances, The Copper Mark will respond to requests within 10 business days. In some cases, The Copper Mark might require requested The Copper Mark-related claims to be adjusted. In such cases, the request should be re-submitted for approval by The Copper Mark.

Claims content or designs should not be finalized or printed until approval is granted by The Copper Mark.

Fees for Use of Claims

Copper Producers participating in The Copper Mark Assurance Process pay an annual fee to The Copper Mark to support its work programme. No additional usage or licensing fee currently applies for any legitimate use of The Copper Mark logo or associated claims. The Copper Mark Board reserves the right to review and amend fee structures from time to time.

5. Monitoring and Enforcement

Monitoring Use of Claims

The Copper Mark will implement the following strategies to monitor the use of The Copper Mark-related claims:

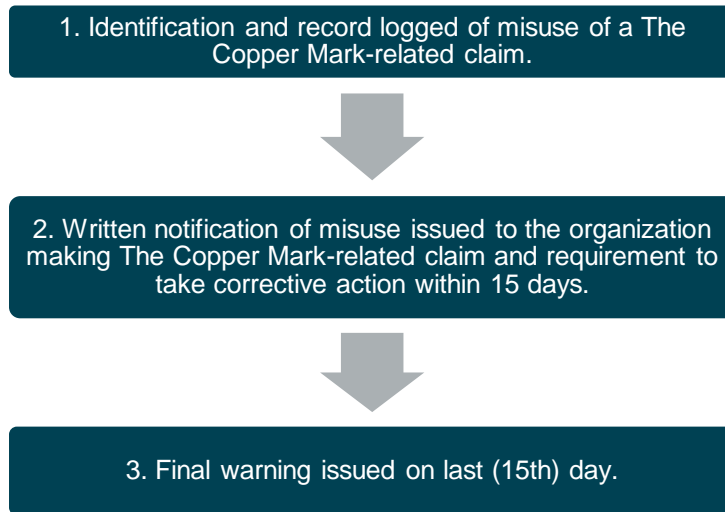
- The Copper Mark will carry out checks to monitor internet-based claims and cross-check these with approved claims, using services such as Google Search and Alert.
- Interested parties can report concerns relating to The Copper Mark-related claims, which The Copper Mark will investigate, through The Copper Mark Grievance Mechanism. The Copper Mark Grievance Mechanism is accessible through The Copper Mark website and is overseen by The Copper Mark.

Identified Misuse of The Copper Mark-Related Claims

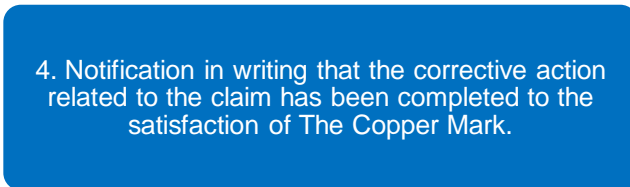
The Copper Mark has the right to suspend or withdraw approval for use of The Copper Mark-related claims where there is a risk that a The Copper Mark-related claim may be false, misleading or confusing or where The Copper Mark Board of Directors decide to disassociate from a participating copper producer.

Identification of potential misuse of The Copper Mark-related claims may be made by The Copper Mark itself, by its stakeholders informing The Copper Mark, or through a complaint being lodged under The Copper Mark Grievance Mechanism. Decisions on whether to suspend or withdraw approval for use of The Copper Mark-related claims will be made at The Copper Mark's discretion. The Copper Mark will record key steps and outcomes in this process.

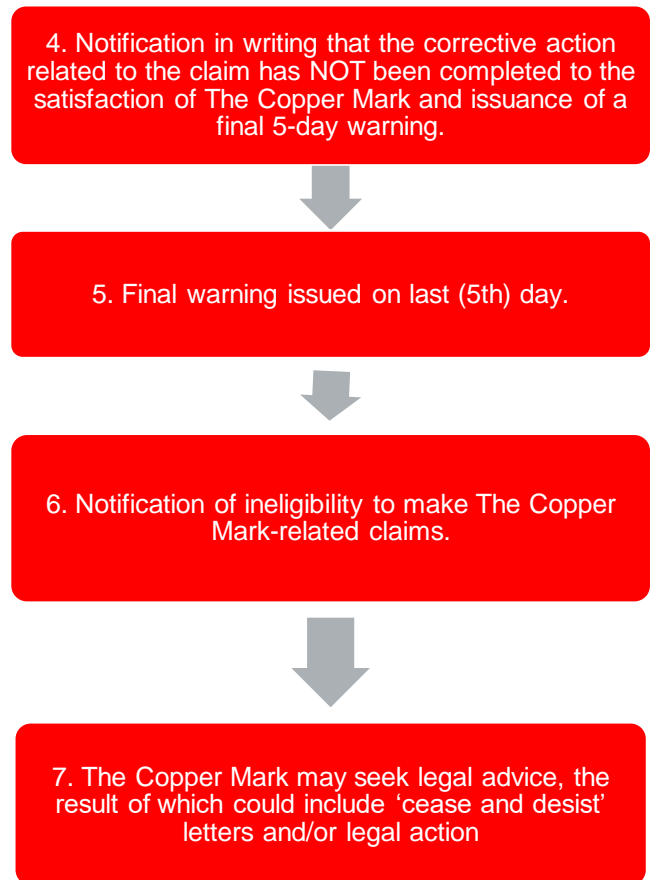
In cases of misuse, The Copper Mark will take the following steps:



Receipt of written confirmation and supporting evidence that the corrective action has been taken



Where corrective action is not undertaken in a timely manner or is inadequate.



6. Related The Copper Mark Information and Documents

The Copper Mark has developed documents with information on The Copper Mark Assurance Process overall and that support the implementation of its Assurance Process, and a glossary of words and terms used by The Copper Mark. Please contact The Copper Mark at info@coppermark.org to request this information.

7. Review of this Guide

The Copper Mark will continue to engage with its participants and stakeholders on the content, implementation and oversight of The Copper Mark Claims Guide. This Guide will be regularly reviewed to take account of implementation experience and identify where it can be improved.

8. Contact The Copper Mark

This Guide aims to cover the key information relating to making The Copper Mark-related claims. The Copper Mark welcomes your feedback and questions, which will be used to inform future revisions of the Guide. If you have any questions, comments or concerns regarding The Copper Mark-related claimss or logo use, please contact us by email at: info@coppermark.org.

For more information on The Copper Mark Assurance Process and how to participate, please visit www.coppermark.org.

9. Glossary

Assessment	An evaluation of the performance of a site against the Copper Mark Criteria or the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc.
Assessor	An independent service provider or individual (third party) that is approved by The Copper Mark Company and contracted by a Site to assess and verify conformance with the Copper Mark Criteria and / or Joint Due Diligence Standard at the site.
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”.
The Copper Mark 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 or the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc. Also referred to as the “Assurance Process”
The Copper Mark Criteria for	The Copper Mark uses the Risk Read Assessment (RRA) as the basis for evaluating participants’ performance. 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

Responsible Production	Copper Mark Criteria Guide. Also referred to as 'The Copper Mark Criteria'
The Copper Mark-related claims	<p>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 The Copper Mark logo and / or Text relating to The Copper Mark Assurance Process, which may be alongside The Copper Mark logo, or standalone.</p> <p>This covers The Copper Mark Assurance Claims and The Copper Mark Marketing Claims.</p>
Copper Producer	A copper producer is defined as an entity with an operating copper mining site and/or a facility with solvent extraction and electrowinning (SX/EW), smelting, or refining operations.
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.
Site	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.

10. References

ISEAL Alliance, Sustainability Claims Good Practice Guide, Version 1.0, May 2015