



## The Copper Mark Summary Assessment Report

### Copper Producer Information

Name of the Copper Producer Site	Kennecott Utah Copper LLC (Rio Tinto Kennecott or RTK)
Unique identifier provided by the Copper Mark	P0001
Address	Rio Tinto Regional Center, 4700 Daybreak Parkway, South Jordan, Utah, 84009 USA
Country of Operation	USA
Types of operations included in scope ( <i>select all that apply</i> )	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other ( <i>please explain</i> )	

### Copper Mark Information

Date the Copper Mark is awarded (dd/mm/yyyy)	31/07/2020
Expiry Date of the Copper Mark (dd/mm/yyyy)	31/07/2023

### Assessment Information

Name of the Lead Assessor	Nicholas Garrett
Name of the Assessment Firm (if applicable)	RCS Global Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	02/03/2020 - 05/03/2020

Assessment Period		Verification of implementation of improvement plans: 22/09/2021
Summary of the Assessment Methodology	<p>The entire assessment process is aligned with ISO19011 requirements. The assessment methodology is comprised of three main phases as follows:</p> <ul style="list-style-type: none"> <li>a) Planning of the assessment strategy</li> <li>b) Execution of the onsite assessment</li> <li>c) Assessment conclusion and reporting</li> </ul> <p>A Final Summary Assessment report and Independent Assurance Statement are completed after the onsite assessment.</p>	
Summary of the Assessment Activities	<ul style="list-style-type: none"> <li>a) Planning of the assessment strategy</li> </ul> <p>Request information about the assessee and its operations related to copper; development of an assessment plan with additional instructions and information requested prior to the onsite assessment; arrangement of logistics.</p> <ul style="list-style-type: none"> <li>b) Execution of the onsite assessment</li> </ul> <p>Work with the assessee to conduct an opening meeting; complete a facility walk-through for visual observations, including RTK's mining &amp; refining/smelting operations; interviews with workers and contractors to assess working conditions; review of policies, procedures and records of implementation; prepare an assessment conclusion and conduct a closing meeting. An Improvement Plan/ Corrective Action Plan (CAP) is discussed during the closing meeting.</p> <ul style="list-style-type: none"> <li>c) Assessment conclusion and reporting</li> </ul> <p>A Final Summary Assessment report and Independent Assurance Statement are completed after the onsite assessment.</p>	

### Equivalencies and Non-Applicable Criteria

The following criteria were confirmed to be not applicable to the Copper Producer:	Risk Area 25: Artisanal and Small-scale Mining
The following equivalent systems were applied (add more rows as appropriate)	
<b>Equivalent System</b> <i>(Name, date of assurance / certification)</i>	<b>Criteria Covered by Equivalency</b>
N/A	

## Summary of Findings

<b>Criterion</b>	<b>Rating</b> <i>Fully meets, partially meets, does not meet, not applicable</i>	<b>Comments</b>
1. Legal Compliance	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has systems in place to ensure compliance with all applicable laws.</p>
2. Business Integrity	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.</p>
3. Stakeholder Engagement	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a structured stakeholder engagement and evaluation process. There is an established grievance mechanism. Public access to grievance channel is here:</p> <p><a href="https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad">https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad</a></p>
4. Business Relationships	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has an effectively implemented adequate due diligence and engagement processes for suppliers and significant business partners.</p>
5. Child Labor	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a control system that prevents the employment of children under the age of 15, prevents the worst forms of child labor, and prevents the exposure of employees under the age of 18 to hazardous work, complemented by the Human Rights Policy and Supplier Code of Conduct.</p>
6. Forced Labor	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system in place that prevents the use of any forms of forced labor and participation in acts of</p>

		human trafficking complemented by the Human Rights Policy, and the Supplier Code of Conduct.
7. Freedom of Association and Collective Bargaining	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has systems in place to respect employees' rights to freedom of association and to collective bargaining in line with ILO Conventions No. 87 and No. 98, participate in collective bargaining processes in good faith and not obstruct alternative means of association where there are legal restrictions.</p>
8. Discrimination	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has systems in place to prevent and address all forms of harassment and discrimination in the workplace.</p>
9. Gender Equality	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has systems in place to continually monitor progress to ensure the implementation of a policy on gender equality in the workplace.</p>
10. Working Hours	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has systems in place to keep employees' total regular and overtime working hours to 60 hour a week. The system was confirmed to be in compliance with applicable law and collective bargaining agreements, to ensure overtime is voluntary, provide for one rest day in seven, and provide for annual leave.</p>
11. Remuneration	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has systems in place to ensure wage equity and external salary competitiveness that equal or exceed the national minimum wage, appropriate industry wage (if higher), or a living wage.</p>
12. Occupational Health and Safety	Fully Meets	<p>The follow up assessment confirms the site fully meets the requirements.</p> <p>RTK has implemented an occupational health and safety management system that is in line with internationally accepted best practice framework, addresses main health and safety risks and provides a safe working environment for workers, employees, and contractors. Opportunity for Improvement is to</p>

		<p>better align the management of a couple of hazardous materials with international standards..</p> <p>Follow up assessment 22/09/21: RTK has an adequate and effective health and safety management system covering cyanide practices. This was confirmed through site observations, review of the updated emergency response and incident action plans.</p>
13. Grievance Mechanism	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a grievance mechanism accessible to all employees.</p>
14. Environmental Risk Management	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has implemented an environmental management system (EMS) functionally equivalent to an internationally recognized EMS standard.</p>
15. Greenhouse Gas (GHG) Emissions	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a process to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting standards. Public reporting available here: <a href="https://www.riotinto.com/sustainability/environment/air">https://www.riotinto.com/sustainability/environment/air</a></p>
16. Energy Consumption	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a process to implement and quantify energy efficiency improvements and increased use of renewable energy.</p>
17. Freshwater Management and Conservation	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a comprehensive multi-stakeholder water stewardship program in place that assesses water-use impacts and risks and implements measures to ensure that water consumption does not restrict availability / access for other water users or reduce the range and populations of fauna and flora in the catchment area of the site / facility.</p>
18. Waste Management	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK implements a risk-based waste management system that includes a commitment to the "waste hierarchy" and is applicable for all waste types.</p>

19. Tailings Management	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system in place to implement the mitigation hierarchy to avoid, minimize, reduce and</p>
20. Pollution	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system in place to implement the mitigation hierarchy to avoid, minimize, reduce and compensate for adverse impacts of pollution on human health and environment (e.g. water, air).</p>
21. Biodiversity and Protected Areas	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system in place to implement the mitigation hierarchy to avoid, minimize, reduce and compensate for adverse impacts on biodiversity; to avoid adverse impacts to Critical Habitats or Endangered Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless specifically and legally permitted.</p>
22. Mine Closure and Reclamation	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a documented plan with stakeholder inputs that addresses environmental and social aspects and makes financial provisions for closure and reclamation of the site / facility.</p>
23. Community Health and Safety	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system in place to monitor, avoid, minimize, reduce and compensate for adverse impacts on community health and safety</p>
24. Community Development	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system in place to identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development.</p>
25. Artisanal and Small Scale Mining	Not Applicable	
26. Human Rights	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p>

		RTK implements the UN Guiding Principles on Business and Human Rights including human rights due diligence.
27. Security and Human Rights	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK implements the Voluntary Principles on Security and Human Rights (VP on SHR) when engaging with private or public security forces.</p>
28. Indigenous Peoples' Rights	Fully Meets	<p>The follow up assessment confirms the site fully meets the requirements.</p> <p>Site based verification confirmed that Rio Tinto has a comprehensive suite of systems, processes and tools to respect indigenous people's rights, including commitments to FPIC. Opportunity for Improvement include to undertake an Indigenous People's Rights assessment to confirm risk levels and develop an Indigenous People's Engagement Plan (as needed based on risk assessment).</p> <p>Follow up assessment 22/09/21: There is an established engagement system to respect the rights of Indigenous Peoples. FPIC is not required as this is not a new mine (Bingham Copper Mine has been in operations since 1906) and the site has not received any claim related to the Utah land. Instead, there are processes to avoid adverse impacts on Indigenous Peoples' lands, livelihoods, resources, and cultural heritage. There is a documented stakeholder' engagement plan, which covers indigenous people.</p> <p>This was confirmed through a review of research, risk identification, and processes to engage stakeholders including the Speak Up grievance mechanism.</p>
29. Land Acquisition and Resettlement	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK holds an RJC COP Certificate (0000 1336, valid until June 2021) and has no allegations of land acquisitions or resettlements.</p>
30. Cultural Heritage	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK has a system to identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce and compensate for adverse impacts on cultural heritage.</p>

31. Due Diligence in Mineral Supply Chains	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK implements the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas. This is supported by their RJC COC Certificate (C00000059, valid until April 2020), and LBMA Report (April 2018). Public information available here: <a href="https://www.riotinto.com/sustainability/human-rights">https://www.riotinto.com/sustainability/human-rights</a></p>
32. Transparency and Disclosure	Fully Meets	<p>The Independent Review confirms the site fully meets the requirements.</p> <p>RTK reports annually on environmental, social and governance performance in line with internationally recognized standards and publicly supports the implementation of EITI. Public information available here: <a href="https://www.riotinto.com/sustainability/sustainability-reporting">https://www.riotinto.com/sustainability/sustainability-reporting</a></p>

### Assessment Conclusions

Statement of conformance	
The site is found to fully meet all applicable requirements of the Risk Readiness Assessment.	<input checked="" type="checkbox"/>
The site is found to fully meet or partially meet all applicable requirements of the Risk Readiness Assessment and has committed to continuous improvement at the site to fully meet all applicable Copper Mark Criteria by 19 May 2022. .	<input type="checkbox"/>
The site is found to miss some or all of the applicable requirements of the Risk Readiness Assessment, and has committed to continuous improvement at the site to fully meet all applicable Copper Mark Criteria by 19 May 2022. .	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment and has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
Additional comments:	