



The Copper Mark Summary Report

Participant Information

Name of the Site	BHP Olympic Dam Corporation Pty Ltd ABN 99 007 835 761
Unique identifier provided by the Copper Mark	P0014
Address	Olympic Dam SA 5725
Country of Operation	Australia
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper product: copper cathodes
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, gold, silver, uranium
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other (<i>please explain</i>)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	Located 560 kilometers north of Adelaide, South Australia, Olympic Dam is one of the

	<p>assets in the BHP group of companies which has deposits of copper, gold, silver, and uranium.</p> <p>Olympic Dam is made up of underground and surface operations and operates an integrated processing facility from ore to metal.</p> <p>The underground mine is made up of more than 450 kilometers of underground roads and tunnels. Ore mined underground is hauled by an automated train system to crushing, storage and ore hoisting facilities.</p> <p>The processing plant consists of two grinding circuits in which high-quality copper concentrate is extracted from sulphide ore through a flotation extraction process. Olympic Dam has a fully integrated metallurgical complex with a grinding and concentrating circuit, a hydrometallurgical plant incorporating solvent extraction circuits for copper and uranium, a copper smelter, a copper refinery, and a recovery circuit for precious metals.</p>
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Independent Review

<p>During this step, the Independent Reviewer examined the Copper Producer’s self-assessment, supporting documentation, independent third-party assurance reports, and publicly available information.</p> <p>The activities included review for completeness, verifying equivalence, and conducting desk-based due diligence.</p> <p>As a result, the Independent Reviewer recommended the scope of the site assessment to the Copper Mark.</p> <p>The Independent Review took place on these dates:</p>	<p>7 June 2021 – 30 July 2021</p>
<p>The Independent Reviewer confirmed completeness, indicating available evidence for the assessor to review for all applicable criteria:</p>	<p>All applicable criteria.</p>
<p>The Independent Reviewer recommended the following criteria be included in the scope of the independent site assessment:</p>	<p>All except 25. Artisanal and Small-Scale Mining</p>
<p>The following equivalent systems were applied:</p>	

Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the [Copper Mark Recognition Process](#).

Equivalent System <i>(Name, date of assurance / certification)</i>	Review Process	Criteria Covered by Equivalency
<p>ICMM (International Council on Mining and Metals) Performance Expectations (EY provided limited assurance on 7 June 2021, please refer to the statement found here).</p>	<p>The Independent Reviewer confirmed the assurance / certification was:</p> <ul style="list-style-type: none"> • Valid at the time of the review • No more than 24 months old and / or plans for reassessment are underway • In effect for an additional 12 months and / or plans for reassessment are underway • Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials • Accompanied by improvement plans where applicable 	<p>All applicable criteria. This is inclusive of a "top up assessment" to review the criteria that are identified as gaps between the ICMM PE and the Risk Readiness Assessment (RRA) for the following criteria:</p> <ul style="list-style-type: none"> • 2. Business Integrity • 10. Working Hours • 11. Remuneration
<p>The Independent Reviewer recommended the following criteria be considered focus areas for the independent site assessment:</p>		<p>No further independent site assessment recommended, but confirmation with the assessment team was conducted on:</p> <ul style="list-style-type: none"> • 3. Stakeholder Engagement • 14. Environmental Management Systems • 17. Freshwater Management and Conservation • 19. Tailings Management • 23. Community Health and Safety • 28. Indigenous Peoples' Rights

The Independent Reviewer recommended the following criteria be considered not applicable to the Site:	25. Artisanal and Small-Scale Mining
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Independent Site Assessment Information

Name of the Lead Assessor	Meg Fricke, Mat Nelson
Name of the Assessment Firm (if applicable)	EY Australia
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	1 April 2021 - 24 May 2021 Site visit: 17 May 2021 - 20 May 2021
Assessment Period	1 July 2019 – 30 June 2020
Summary of the Assessment Methodology	<p>EY developed a limited assurance methodology specific to the International Council on Mining and Metals (ICMM) Performance Expectations and The Copper Mark Self Assessments in accordance with International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information.</p> <p>This methodology included:</p> <ol style="list-style-type: none"> 1. Assurance Planning and Strategy <ul style="list-style-type: none"> - Opening meeting with client contacts - Assessment of ICMM Performance Expectations and Copper Mark criteria, including engagement with Copper Mark - Risk Assessment against the ICMM Performance Expectations and Copper Mark criteria specific to Olympic Dam's operating context - Development of specific procedures and approach for assurance execution 2. Execution <ul style="list-style-type: none"> - Inspection of documentation including policies, procedures, data, and other evidence - Virtual meetings with functional owners at BHP Group and Olympic Dam to understand processes and activities to address the ICMM Performance Expectations and The Copper Mark criteria - Site visit to Olympic Dam head office and mine site including interviews with functional owners, workers, and local stakeholders - Assess ICMM Performance Expectations and The Copper Mark Self-Assessment determinations against evidence and observations - Held discussions around rating differences, supporting documentation, gaps and plans to address gaps 3. Conclusion

	<ul style="list-style-type: none"> - Executive check and final inspection of self-assessments - Drafting and finalising assurance statement - Drafting and finalising the Copper Mark Summary Assessment Report - Closing meeting with BHP <p>Note that the EY assurance team has previously undertaken site-based assurance activities at Olympic Dam in 2019 and undertakes annual assurance activities across BHP for sustainability disclosures.</p>
<p>Summary of the Assessment Activities</p>	<p>The execution procedures included, but were not limited to, the following:</p> <ul style="list-style-type: none"> - Conducting interviews (in person and virtual) with BHP Group and Olympic Dam personnel to understand the reporting process for the Self Assessments - Checking accuracy and completeness of Criteria assessed - Checking whether the information disclosed in both the ICMM Performance Expectations, and The Copper Mark Self Assessments are consistent where equivalent - Checking Olympic Dam’s classification of applicability and whether they have met, partially met, or not met the noted Criteria - Inspecting referenced policies and documents to assess whether classification can be supported - Performance of site-based inquiries of internal and external stakeholders to check documentation and written evidence. Consideration was also given to interviews and assessments performed in person at Olympic Dam in 2019. - Checking whether the information disclosed in the Self Assessments is consistent with our understanding and knowledge of Olympic Dam's governance, accountability, and sustainability management as reviewed in our assurance of BHP’s FY20 sustainability disclosures in the Annual Report. <p>EY’s assurance statement can be found here.</p>

Summary of Findings

<p>Criterion</p>	<p>Rating</p> <p><i>Fully meets, partially meets, does not meet, not applicable</i></p>	<p>Comments</p> <p><i>Includes link to publicly available documents or supporting evidence where possible and at a minimum for those criteria with an *</i></p>
<p>1. Legal Compliance</p>	<p>Fully meets</p>	<p>The Independent Review confirmed that the site meets the requirement as</p>

		<p>validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to ensure compliance with all relevant legal requirements including regional, state, national and international law.</p>
2. Business Integrity	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a policy in place that is designed to prohibit and prevent bribery, including facilitation payments, corruption, and anti-competitive behaviour. The policy includes management systems (EthicsPoint conduct reporting system) that aim to identify any contraventions to the policy.</p>
3. Stakeholder Engagement*	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a stakeholder mapping process that is utilised across multiple purposes including new projects, site activities and general consultation. In addition, Olympic Dam has a complaints and grievance mechanism to receive complaints and concerns from community stakeholders and these can be raised anonymously through BHP's confidential speak-up tool, EthicsPoint.</p> <p>EthicsPoint can be accessed here.</p>
4. Business Relationships	Partially meets (improvements monitored by ICMM)	<p>The Independent Review confirmed that the site partially meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has systems in place that are designed to promote responsible business conduct with significant business partners, including suppliers. To fully meet this</p>

		criteria, Olympic Dam is currently working to strengthen engagement with contractors for full alignment of safety management procedures and standards.
5. Child Labor	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to prevent the employment of children under the age of 15, prevent the worst forms of child labour, and prevent the exposure of employees under the age of 18 to hazardous work.</p>
6. Forced Labor	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to prevent the use of any form of forced labour and participation in acts of human trafficking.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to respect employees' rights to freedom of association and to collective bargaining.</p>
8. Discrimination	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to prevent and address all forms of harassment and discrimination in the workplace.</p>
9. Gender Equality	Fully meets	The Independent Review confirmed that the site meets the requirement as

		<p>validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to assess and monitor progress and implementation of gender equality in the workplace.</p>
10. Working Hours	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to responsibly manage employees regular and working time hours as defined by a collective bargaining agreement and/or in line with applicable law.</p>
11. Remuneration	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to pay wages that equal or exceed the national minimum wage, the appropriate industry wage, or a living wage.</p>
12. Occupational Health and Safety	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to manage occupational health and safety in line with internationally accepted frameworks.</p>
13. Grievance Mechanism	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to provide a grievance mechanism that</p>

		is accessible to all employees across a number of forums.
14. Environmental Risk Management	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to manage environmental risk in line with internationally accepted frameworks.</p>
15. Greenhouse Gas (GHG) Emissions*	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has established reduction targets for operational CO2 equivalent emissions and quantifies and discloses CO2 equivalent emissions in line with the GHG Protocol.</p> <p>Details on BHP's emission targets and performance can be found in BHP's Annual Report and on its website, here.</p>
16. Energy Consumption	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has management systems that are designed to implement and quantify energy efficiency improvements.</p>
17. Freshwater Management and Conservation	Partially meets (improvements monitored by ICMM)	<p>The Independent Review confirmed that the site partially meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to assess and manage water-use risks and impacts. To fully meet this criteria, Olympic Dam is progressively implementing action plans to improve key water stewardship commitment areas including implementation of TCE (Technical Centre of Excellence)</p>

		standards, risk, accountabilities, data, and planning.
18. Waste Management	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to implement a risk-based waste management system including a commitment to the waste hierarchy.</p>
19. Tailings Management	Partially meets (improvements monitored by ICMM)	<p>The Independent Review confirmed that the site partially meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place that is designed to ensure that tailings impoundments are designed, operated, monitored, and closed in line with internationally recognised standards.</p> <p>The rating for the purposes of this question has been assessed against the ICMM Performance Expectations for tailings storage facilities, and the ICMM has issued guidance that require operators to report a “partially meets” until the facility is in full conformance with the new Global Industry Standard on Tailings Management (GISTM). BHP is working towards conformance with the GISTM in accordance with the timelines prescribed by the ICMM.</p>
20. Pollution	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a system in place to minimise, reduce, and address the effects of pollution from its operations.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p>

		Olympic Dam has a management system in place (based on the mitigation hierarchy) designed to avoid, minimise, 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.
22. Mine Closure and Reclamation	Partially meets (improvements monitored by ICMM)	<p>The Independent Review confirmed that the site partially meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a closure plan in place. To fully meet this criteria, Olympic Dam is working to improve ongoing stakeholder consultation.</p>
23. Community Health and Safety	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place (based on the mitigation hierarchy) which includes the collection of research, information obtained from stakeholders and concerns and complaints raised, designed to monitor, avoid, minimise, reduce, and compensate for adverse impacts on community health and safety.</p>
24. Community Development	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a process to identify community needs and uses this information to inform its social investment plan and budget. The social investment budget is fully expended annually.</p>
25. Artisanal and Small-Scale Mining	Not applicable	There is no artisanal and small-scale mining in the area of influence.
26. Human Rights	Fully meets	The Independent Review confirmed that the site meets the requirement as

		<p>validated through the ICMM PE Assessment.</p> <p>Aligned with the Company’s Human Rights Policy Statement, Olympic Dam has a system to implement the UNGPs including human rights due diligence through risk identification, human rights impact assessments, and procedures to protect, respect, and remedy.</p>
27. Security and Human Rights	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place designed to implement the Voluntary Principles on Security and Human Rights in its approach to managing the security teams working at site and in the village.</p>
28. Indigenous Peoples’ Rights	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place designed to respect and respond to the rights of Indigenous peoples.</p>
29. Land Acquisition and Resettlement	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a process in place designed to avoid land acquisition or resettlement where possible and manage it in alignment with the IFC Performance Standard 5 where required.</p>
30. Cultural Heritage	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has a management system in place designed to identify cultural heritage sites and establish a</p>

		process to limit adverse impacts on cultural heritage.
<p>31. Due Diligence in Mineral Supply Chains (note the site did not voluntarily apply the Joint Due Diligence Standard for Copper, Lead, Zinc and Nickel)</p>	<p>Partially meets (improvements monitored by ICMM)</p>	<p>The Independent Review confirmed that the site partially meets the requirement as validated through the ICMM PE Assessment.</p> <p>There are existing management systems and processes in place for due diligence in mineral supply chains and to fully meet this criterion, a specific OECD Due Diligence Guidance (DDG) alignment project is underway to: (a) align existing management systems more acutely with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas (CAHRA); and (b) to implement that refined due diligence management system, including supporting tools and processes.</p> <p>The OECD DDG alignment project will refine and formalise processes for red flag identification, risk assessment and risk management.</p> <p>While there is public reporting on supply chain due diligence broadly in BHP's Annual Report (available here) and Modern Slavery Act Statement (available here), it is not specific to the OECD Due Diligence Guidance. The OECD DDG alignment project will also deliver a clear public reporting approach to minerals supply chain due diligence in line with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas.</p>
<p>32. Transparency and Disclosure*</p>	<p>Fully meets</p>	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Olympic Dam has processes in place to report annually on environmental, social and governance performance through BHP Group reporting. This information is available in BHP's Annual Report as well as online, here.</p>

Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard.	<input type="checkbox"/>
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 30 October 2022.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some or all of the applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 30 October 2022.	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment and / or for Criterion 31, the applicable criteria of the Joint Due Diligence Standard. The Site has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.
Additional comments:	The Joint Due Diligence Standard was not applied; however, the site was found in conformance of Criterion 31.

Copper Mark Award

This Summary Report is prepared using data from the independent review report and the independent assessment report. The Copper Mark confirms the assessor's conclusion and awards the Copper Mark as follows

Date the Copper Mark is awarded (dd/mm/yyyy)	21/09/2021
Expiry Date of the Copper Mark (dd/mm/yyyy)	21/09/2024