



The Copper Mark Chain of Custody Standard

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1 Introduction

A chain of custody (CoC) is a system of control and transparency, specifically, the documented record of the sequence of companies and individuals that have *custody* of *materials* as they move through a supply chain. CoC systems can provide an important point of differentiation and confidence in the responsible production claims of a product for customers, end-users, and other stakeholders when well-defined and validated.

The Copper Mark CoC Standard (CoC Standard) sets the rules for the system as well as the evidence required to demonstrate conformance to those rules. Conformance to the CoC Standard is validated through the implementation of the Copper Mark Assurance Process. The Assurance Process allows *sites* conformant with the Copper Mark's CoC Standard at different points in the supply chain to make product-level claims related to "*Copper Mark copper*" in accordance with the Copper Mark Claims Guide.

The CoC Standard complements the Copper Mark Responsible Production Criteria, against which copper producers are independently assured as having responsible production practices. Its implementation is voluntary for Copper Mark participants.

The CoC Standard is based on the [Copper Mark principles](#) of

- Inclusiveness
- Collaboration
- Continuous Improvement
- Progressiveness
- Pragmatism

2 Objectives

The CoC Standard's core objectives are to:

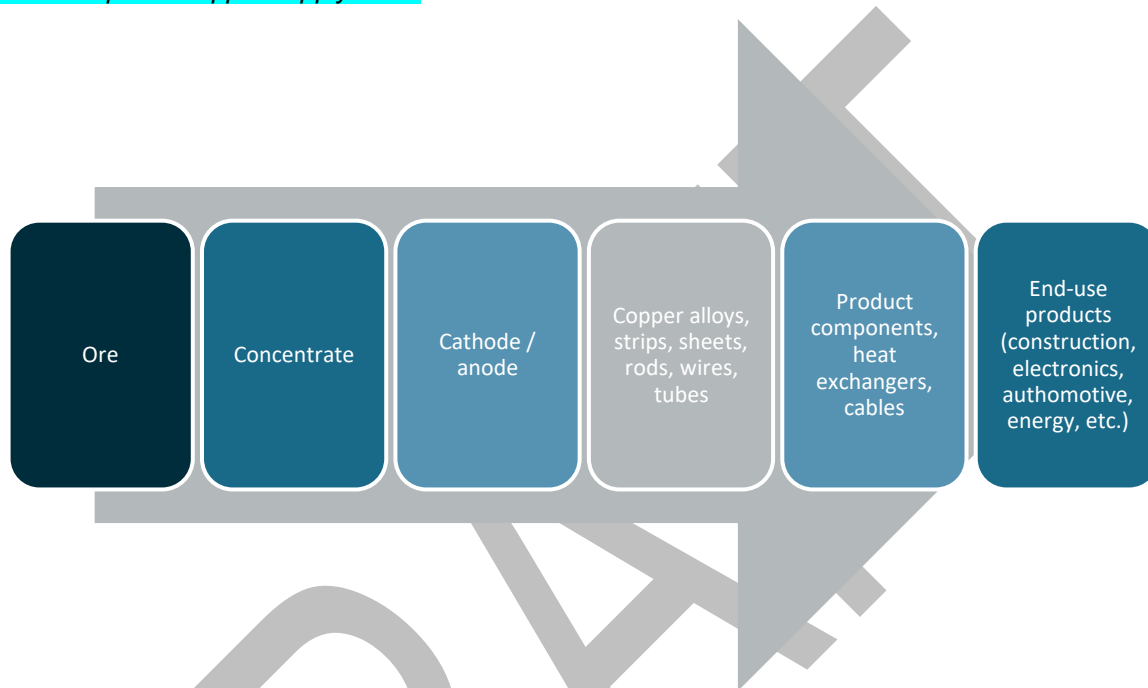
- Increase transparency in copper supply chains.
- Allow customers to be confident that their copper was produced responsibly.
- To track subject copper product as it moves between responsible copper producers and processors.
- Contribute to the uptake of responsible production practices and in particular use of the Copper Mark Responsible Production Criteria (Copper Mark Criteria) and Assessment Process.
- Contribute to the increased use of recycled material and support efforts to move to a circular economy.
- Allow product-level claims of Copper Mark copper

3 Core Elements

The CoC Standard incorporates the following core elements:

- **Applicable along the supply chain:** The CoC Standard is available to the full supply chain, from mines to end products, including pre-consumer copper.

Figure 1: Simplified copper supply chain



- **Built on responsible production:** *sites* that are in scope of the Copper Mark Assurance Framework shall demonstrate conformance with the Copper Mark Responsible Production Criteria (the Copper Mark Criteria) to be eligible for an assessment against the CoC Standard.
- **Focused on copper products:** Users are able to make product-level claims regarding the content of “*Copper Mark copper*” in their product. All copper-containing products are included in the scope of the CoC Standard.
- **Allows separation and mass balance systems:** Users are able to choose between applying a separation system or a mass balance system at site level.
- **Inclusive of responsibly sourced scrap:** Users are able to make “*Copper Mark copper*” claims for *secondary material* subject to having conducted due diligence on *secondary material* supply chains in accordance with the Copper Mark Criteria.
- **Voluntary:** Implementation of the CoC Standard is voluntary.
- **Independently verifiable:** The CoC Standard defines independently verifiable assessment criteria for actors in the copper supply chain to implement separation or mass balance chain of custody systems.

4 Related Documents

The CoC Standard shall be read in conjunction with the following Copper Mark documents:

- Copper Mark Assurance Process
- Copper Mark Claims Guide
- Copper Mark Criteria Guide
- Copper Mark Recognition Process
- *Copper Mark standards*
- RRA-Copper Mark Equivalency Matrix

5 Scope

5.1 Geographic scope

The CoC Standard has a global scope.

5.2 Sites in scope

The CoC standard is implemented and assessed at *site*-level. The scope includes all operations that the *site* uses to process, store, handle, ship and receive *Copper Mark copper*.

The CoC Standard applies to any *site* in the copper value chain who directly purchases *Copper Mark copper* or who purchases a product that contains *Copper Mark copper* and wish to make assurance claims.

Different requirements apply to:

- *Sites* that are eligible for an assessment against the Copper Mark Criteria.
- *Sites* that are not eligible for an assessment against the Copper Mark Criteria.

5.2.1 *Sites that are eligible for an assessment against the Copper Mark Criteria*

An assessment against the Copper Mark Criteria is available to *sites* up to and including the point where a product made from copper or copper alloys is given a special shape, surface or design which determines its function to a greater degree than its chemical composition, and down to but not including the point where a complex object is manufactured. For avoidance of doubt, these are:

1. A copper producer, defined as the *site* of a company that is 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
2. A *site* where copper and copper alloy *materials* are processed, treated, mixed, formulated, handled, and otherwise manipulated.

These are generally referred to as *mines*, *smelters*, *refiners*, *recyclers* or *fabricators*, but may also include *traders* or other supply chain actors.

5.2.2 Sites that are not eligible for an assessment against the Copper Mark Criteria

Sites that purchase *Copper Mark copper* or a product that contains *Copper Mark copper* for use in a complex object but do not physically or chemically alter the copper itself are not eligible nor required to undergo an assessment against the Copper Mark Criteria.

These are generally referred to as *manufacturers* or *end users* but may also include *traders*.

Chart 1: Eligibility for Copper Mark assessments

| | Mine | Smelter | Trader | Refiner | Fabricator | Manufacturer | End user |
|--|------|---------|--------|---------|------------|--------------|----------|
| Eligible for the CoC Standard | X | X | X | X | X | X | X |
| Eligible for the Copper Mark Production Criteria | X | X | X | X | X | | |

Chart 2: Applicable sections of the CoC Standard per actor in the supply chain

| | Mine | Smelter | Trader | Refiner | Fabricator | Manufacturer | End user |
|--------|------|---------|--------|---------|------------|--------------|----------|
| 6 | X | X | X | X | X | X | X |
| 6.1. | X | X | X | X | X | X | X |
| 6.2. | X | X | X | X | X | X | X |
| 7.1. | X | X | X | X | X | X | X |
| 7.1.1. | X | X | X | X | X | | |
| 7.1.2. | X | X | X | X | X | | |
| 7.1.3. | X | X | X | X | X | | |
| 7.1.4. | X | X | | X | X | | |

| | | | | | | | |
|--------|---|---|---|---|---|---|---|
| 7.1.5. | X | X | | X | X | X | X |
| 7.2. | X | X | X | X | X | X | X |
| 7.2.1. | X | X | X | X | X | X | X |
| 7.2.2. | X | X | X | X | X | X | X |
| 7.3. | X | X | X | X | X | X | X |
| 7.3.1. | X | X | X | X | X | | X |
| 7.3.2. | X | X | X | X | X | X | X |
| 7.3.3. | X | X | X | X | X | | X |
| 7.3.4. | X | X | X | X | X | | X |
| 7.3.5. | X | X | X | X | X | X | X |
| 7.4. | X | X | X | X | X | X | X |
| 8 | X | X | X | X | X | X | |
| 9 | X | X | X | X | X | X | X |

5.3 Materials in scope

The CoC Standard covers all copper-containing *materials* received, held, and/or processed during the assessment period. For avoidance of doubt, this includes copper ore, concentrate, anodes, cathodes, scrap, alloys, intermediate products, and finished copper products.

For products that contain copper (i.e., complex objects), any claims are limited to the copper in the product, not the product itself.

Sites might produce other metals as well as copper. However, because the CoC Standard’s primary objective is to link responsible copper producers with responsible copper products, the material in scope is limited to copper.

6 Chain of Custody Models

Sites may use one of two models¹:

6.1 Separation model

Copper Mark copper is separated from non-*Copper Mark copper* through each stage of the supply chain, including within the *site*, allowing assurance that the copper originates from *sites* that have received The Copper Mark, though it may not be possible to identify

¹ Adapted from the [ISEAL Chain of Custody models and definitions](#) for segregation and *site*-level mass balance.

which molecules came from which *sites*. A *site* cannot decide to apply or represent itself or its products as being tracked through the separation model after receiving *Copper Mark copper* produced using a mass balance model.

Figure 2: Separation model

[INSERT DIAGRAM]

6.2 Mass balance model

Copper Mark copper is physically separated from non-*Copper Mark copper* until a processing stage when the *Copper Mark copper* is allowed to be mixed with non-*Copper Mark copper*. In this instance, proportions of *Copper Mark copper* and non-*Copper Mark copper* at the overall *site* level are recorded and reconciled.²

Figure 3: Mass balance model

[INSERT DIAGRAM]

The *site* shall notify the Copper Mark of which model they are using.

7 Conformance Requirements

7.1 Management systems

The *site* shall have a CoC *management system* that is appropriate to the size and complexity of its operations.

Elements of the *management system* may be integrated into existing *management systems* such as sourcing, sales, legal, and internal controls.

At a minimum, the *management system* shall include the following elements.

7.1.1 Leadership

The *site's* senior management shall commit to the effectiveness of the *management system* by:

- Understanding the requirements under the Copper Mark criteria.
- Assuming accountability for its implementation and maintenance and the achievement of intended results.
- Ensuring its requirements are integrated into the *site's* business processes.

² This standard does not allow for products to have a “partial *Copper Mark copper*” claim. The output quantity is designated as all *Copper Mark copper* using the certified source content claims model.

- Allocating resources for building and maintaining internal capacity to implement the *management system*.
- Ensuring continual improvement of the *management system*.

7.1.2 Organisational Roles, Responsibilities and Accountabilities

The *site* shall assign the responsibility and accountability to a member of its senior management with the necessary competence, knowledge, and experience to:

- Oversee the *management system*.
- Make decisions for its implementation.
- Regularly review the effectiveness and the performance of the *management system* and take necessary action to address gaps and deficiencies and pursue improvements opportunities.

7.1.3 Resources Management

The *site* shall:

- Determine and provide the resources needed to support the implementation, maintenance, and continual improvement of the *management system*, considering *site* size, location, and circumstances.
- Define the competences needed to manage and implement the *management system* and ensure that the staff managing and implementing the *management system* has these competences, on the basis of education, training and/or experience.
- Provide sufficient training on the *management system* and process to relevant employees and maintain training records.

7.1.4 Performance Evaluation and Improvement

The *site* shall evaluate the effectiveness of the *management system* at pre-determined intervals and determine:

- The scope of the evaluation.
- The methodology of the evaluation.
- The timing of the evaluation.
- The *site* shall use the results from the evaluation to plan for continuous improvement of the *management system*.

7.1.5 Process to Address Complaints, Gaps, Mistakes, and Inconsistencies

The *site* shall design and implement a process to identify, investigate and correct complaints, gaps, mistakes, and inconsistencies related to the production, transfer, receipt, or other handling of *Copper Mark copper*. The process shall include gaps, mistakes or inconsistencies made by the *site* as well as any complaints, gaps, mistakes, and inconsistencies brought forth by customers or suppliers.

This process shall include direction to:

- Investigate any complaints or concerns about gaps, mistakes or inconsistencies identified or received.
- Develop an improvement plan to avoid future gaps, mistakes, or inconsistencies when these were caused by the *site* and assist customers or suppliers in developing an improvement plan when the gaps, mistakes or inconsistencies were caused by the customer or supplier.
- Determine and implement an appropriate way to address the mistake or inconsistency.
- Notify the customer / supplier (respectively) and the Copper Mark.

Mistakes or inconsistencies concerning Copper Mark copper received

- Notify the supplier and the Copper Mark without delay
- Agree on steps to address the gap, mistake, or inconsistency either by:
 - Returning the *materials*
 - Retaining the *materials* but removing the *Copper Mark copper* status (i.e., no further transfer records may be issued)
 - Retaining the *materials* and a corrected *CoC transfer record*
- Document the gap, mistake or inconsistency and the steps taken to address it

Mistakes or inconsistencies concerning Copper Mark copper sent

- Notify the buyer and the Copper Mark without delay
- Agree on steps to address the gap, mistake, or inconsistency, either by
 - Accepting returned *Copper Mark copper*
 - Agreeing to remove the *Copper Mark copper* status (i.e., no further transfer records may be issued)
 - Providing a corrected *CoC transfer record*
- Investigate the root cause of the gap, mistake or inconsistency

- Develop and implement corrective action to avoid future mistakes or inconsistencies
- Document the mistake or inconsistency and the steps taken to address it

A *site* shall monitor their systems on an ongoing basis as well as through a documented formal review at a frequency appropriate for the *site*.

7.2 Eligible Copper

A core element of the CoC Standard is to identify the type of copper (primary or secondary) and its *point of origin*.

If the type and *point of origin* of copper cannot be determined, the subject copper is not eligible to be used as *Copper Mark copper*.

7.2.1 Primary Copper

For *primary material* to be eligible to be *Copper Mark copper*, all the following criteria must be met:

- The type of *primary material* is identified and recorded;
- The *point of origin* of the *primary material* is identified and recorded;
- The *point of origin* meets one of the following criteria at the time when the copper is produced:
 - The *point of origin* is a recipient of the Copper Mark
 - The *point of origin* is a recipient of the Copper Mark that are in the process of re-assessment
 - The *point of origin* is certified by a fully equivalent system (an up-to-date list of equivalent systems is available [here](#).)

A *site* may combine an assessment against the [Copper Mark Criteria](#) and the CoC Standard, however they may not make CoC Standard-related claims until they receive the Copper Mark.

7.2.2 Secondary Copper

For *secondary material*, the following criteria must be met:

- The type of *secondary material* is identified and recorded (run-around, pre-consumer, or post-consumer).
- Where the *point of origin* of the *secondary material* is not known, the *site* shall engage with immediate suppliers to increase transparency of the *secondary*

material supply chain with a view to identify the *point of origin*. **Secondary material for which the *point of origin* is not known is not eligible for the CoC Standard.**

- Where the *point of origin* of the *secondary material* is known, the *site* shall identify and record it. Additionally, the *site* shall:
 - Confirm that the *point of origin* is a recipient of the Copper Mark or is in the process of a Copper Mark re-assessment at the time the *secondary material* is processed, or
 - Confirm that the *point of origin* has been certified by an equivalent system (an up-to-date list of equivalent systems is available [here](#)) at the time the *secondary materials* is processed, or
- For *pre-consumer and post-consumer material*, the *site* has conducted due diligence on the *secondary material* supply chain, up to and including the *point of origin*. The *site* shall, at a minimum:
 - Conduct a risk assessment on the supply chain against the Copper Mark Criteria or an equivalent set of requirements.
 - For *points of origin* that are considered high risk, conduct or commission an onsite visit to assess the entity's performance against the Copper Mark Criteria or an equivalent set of requirements.
 - Use the results of the risk assessment and onsite visit to engage with identified high-risk supply chain actors to develop and implement *risk mitigation* strategies.
 - Report to senior management and integrate the results of the risk assessment and onsite visits in its *management system* for the responsible sourcing of copper.

7.3 Material accounting system

The site shall have a *Material accounting system* designed to maintain controls of the *Copper Mark copper* from the time it enters the *site* until the time the final product leaves the *site*.

The *Material accounting system* shall include the following elements.

7.3.1 Record Incoming Material

For all incoming material, record the following information:

- Date material is received.
- The name and address of the supplier.
- Type of material (primary or secondary).

- Type of *secondary material* (run-around, new, end-of-life)
- Description of material (e.g., concentrate, cathode, anode, circuit board, shavings, wire, sludge, alloy, etc.).
- Weight and percent of copper content for simple objects
- Weight of copper content for complex objects
- Unique identification number of the material to be used in the production process.

Where *Copper Mark copper* is received, the *site* must record the following additional data points:

- *CoC transfer record* reference number, issued by the supplier. For *Copper Mark copper* processed using the separation model, this number should not change throughout the supply chain.
- Unique identification number of the supplier issued by the Copper Mark.
- The weight of the *Copper Mark copper* content.
- The applicable CoC model applied to the production of the copper (separation or mass balance).

7.3.2 Review CoC transfer records

If incoming material is *Copper Mark copper*, it must be accompanied by a valid *CoC transfer record* (see Section XXX). The *site* must confirm that the material received matches the information provided on the *CoC transfer record*. Materials should be secured and separated until all documents are received, reviewed, and validated.

7.3.3 Separation Model Only

In the separation model, *Copper Mark copper* shall be kept physically separated from non-*Copper Mark copper* throughout storage and all stages of production.

In cases where there may be mixing of previously processed *materials* (for example, melting, smelting, or refining), the *site* may mix 100% *Copper Mark copper* with other 100% *Copper Mark copper*. A *site* cannot apply the separation model after receiving *Copper Mark copper* produced using a mass balance model.

The *site* must be able to demonstrate that separation is implemented effectively throughout the production process.

7.3.4 Mass Balance Only

In the mass balance model, the percentage of product that can be claimed as *Copper Mark copper* is directly determined by the *site's* total *Copper Mark copper* input percentage over the assessment period. The CoC standard does not allow for products to have a “partial *Copper Mark copper*” claim. The total volume of products claimed to be *Copper Mark copper* cannot exceed the total volume of *Copper Mark copper* output. Under the mass balance model, actual *Copper Mark copper* may or may not be present in the *Copper Mark copper* products.

To calculate the input percentage, the *site* input of *Copper Mark copper* is divided by the sum of input of *Copper Mark copper* and non-*Copper Mark copper*, where the unit of measurement for both the numerator and the denominator are the same, as depicted here:

$$\frac{\text{(Input of Copper Mark copper)}}{\text{(Input of Copper Mark copper) + (input of non-Copper Mark copper)}}$$

The resultant number is then multiplied by 100 to get the percentage.

The quantities should be calculated in the appropriate form of measurement, usually mass.

7.3.5 Reconciliation and Losses

The *site* shall reconcile the total volume of *Copper Mark copper* input and the total *Copper Mark copper* output over the *Material accounting period*. The *site* may define its own *Material accounting period*, which may be no more than 12 months.

The reconciliation shall record the input and output volume and percentage of *Copper Mark copper* as part of the total copper volume received and sent or sold.

Where there is a positive balance of *Copper Mark copper* at the end of the *Material accounting period*, it shall be clearly recorded. A positive balance may be carried over to the subsequent *Material accounting period* but will expire at the end of that next period.

The *site* shall explain and document the reasonable losses from the *site's* processes. The *site* shall record and investigate any unreasonable losses in accordance with **Section XXX on addressing complaints, gaps, mistakes, and inconsistencies.**

7.4 CoC transfer records

Each time there is a change in *custody* of the *Copper Mark copper*, there shall be an updated *CoC transfer record*, issued by the *site* that currently has *custody* of the *Copper Mark copper*.

Where *Copper Mark copper* is passed through by a *site*, the *site* shall transmit the *CoC transfer record* received from the supplier to its customer without making any changes or alterations.

7.4.1 Validity of the *CoC transfer record*

A *CoC transfer record* is valid as long as the *site* that issued it continues to participate in the Copper Mark Assurance Process. This list of participants is updated on the Copper Mark website in real time.

If a *site* no longer meets the requirements of the *Copper Mark standards*, the Copper Mark will notify the *CoC Standard users*.

Copper Mark copper supplied before the change of status of the participant will not be affected and *sites* along the chain are not expected to retroactively adjust their *Material accounting systems* accordingly.

Copper Mark copper supplied after change of a status of a participant takes effect is no longer considered to be Copper Mark.

7.4.2 Contents of the *CoC transfer record*

The *CoC transfer record* must include, at a minimum, the following information:

- Date of issue of the *CoC transfer record*.
- *CoC transfer record* reference number, issued by the *site* and correlating with the *site's Material accounting system*.
- The name and address of the issuing *site*.
- Unique identification number of the issuing *site* issued by the Copper Mark.
- The name of the responsible person at the *site* who can verify information in the *CoC transfer record*.
- The name and address of the customer.
- Unique identification number of the customer issued by the Copper Mark, where applicable.
- Description of *Copper Mark copper* (e.g., concentrate, cathode, anode, circuit board, shavings, wire, sludge, alloy, etc.)
- The weight of the *Copper Mark copper*.
- The applicable *CoC* model applied to the production of the copper (separation or mass balance).
- **For separation only:** all *sites* involved in the production of the subject copper using the separation model.

Sites may include additional information (such as e.g., greenhouse gas emissions) on the *CoC transfer record* as long as it is clearly indicated that it has not been validated by the Copper Mark.

7.4.3 Communicating the *CoC transfer record*

Each *CoC transfer record* shall be physically or digitally connected to the *Copper Mark copper* or copper-containing product. A template is provided in Annex I, however *sites* may choose to integrate the required information into their own format.

On an annual basis, the *site* must report a sampling of *CoC transfer records* to the Copper Mark. The Copper Mark will conduct a system reconciliation of all *CoC transfer records* on a regular basis.

8 Outsourcing contractors

When using an outsourcing contractor, the *site* shall retain ownership of all *materials*. If the *site* does not retain ownership of all *materials*, the copper returned by the outsourcing contractor is no longer be considered *Copper Mark copper*.

The CoC Standard allows for the outsourcing of *Copper Mark copper* to companies who are not assessed in accordance with the CoC Standard with the following conditions:

- The *site* reviews the contractor's processes to understand the potential risks of mixing its *Copper Mark copper* with non-*Copper Mark copper*. For purposes of this section, an outsourcing contractor who mixes material is considered "high-risk."
- The *site's* contract with the outsourcing contractor requires a continuance of separation or mass balance models as required to support the CoC model used by the *site*.
- The *site* prohibits outsourced contractors from sub-contracting any activities involving *Copper Mark copper* to any other companies.
- In accordance with the results of the review above, the *site* requires:
 - For low-risk contractors: records to verify conformance with the contract requirements and requirements of the CoC Standard.
 - For high-risk contractors: third- or second-party site-visit to verify conformance with the contract requirements and requirements of the CoC Standard.
- Any mistakes or inconsistencies result in corrective actions and / or termination of the *site's* relationship with the outsourced contractor.

When a *site* cannot meet the above requirements with their *Outsourcing contractors*, the copper returned by the outsourcing contractor will no longer be considered *Copper Mark copper* and shall be recorded and handled accordingly.

The *site* must maintain a list of all outsourced contractors and records of due diligence for review in an assessment of the CoC Standard.

9 Claims

The Copper Mark allows assured claims by *sites* that have fulfilled the requirements of the Copper Mark Assurance Process against the *Copper Mark standards*.

They include text claims and the Copper Mark logo, and their permitted use must adhere to the [Copper Mark Claims Guide](#).

Assurance against the Copper Mark CoC Standard relates to secure and documented transfer of the copper product itself or to the flow of material through the copper supply chain. Assured claims are permitted:

- For *sites* that are eligible for an assessment against the Copper Mark Criteria: if the *site* fulfilled the requirements of the Copper Mark Assurance Process against the Copper Mark Criteria and the CoC Standard.
- For *sites* that are not eligible for an assessment against the Copper Mark Criteria: if the *site* fulfilled the requirements of the Copper Mark Assurance Process against the CoC Standard.

10 Technology

New technologies to track and trace material through the supply chain is constantly emerging. The Copper Mark believes that technology can play an important role in supporting transparency in global supply chains. The CoC Standard does not require *sites* to use any technology to meet the conformance requirements. Nevertheless, the Copper Mark recognizes that technology can be a tool to support the objectives and implementation of the CoC Standard.

The Copper Mark continues to monitor developments, particularly related to new technologies such as blockchain. It will regularly review and assess whether and how technologies may be incorporated in the CoC Standard in the future.

11 Glossary

Actual adverse impact(s): An adverse impact that has already occurred or is occurring.³

Adverse impact(s): Negative consequences associated with the occurrence of Annex II risks. Such consequences may include harm to people (i.e. external impacts), or reputational damage or legal liability for the company (i.e. internal impacts), or both.

³ United Nations Human Rights Office of the High Commissioner (2012), *The Corporate Responsibility to Respect Human Rights – An Interpretative Guide*, United Nations, New York and Geneva. p. 5.

Such internal and external impacts are often interdependent, with external harm coupled with reputational damage or exposure to legal liability.⁴

CoC transfer record: The record that accompanies the Copper Mark copper as it is transferred along the supply chain and among outsourced contractors and contains all required information per The CoC Standard.

Copper Mark copper: Eligible copper that either as an input or an output is considered responsibly produced.

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.

Custody: Physical and legal possession of materials.

End user: The organization that consumes or uses the copper or copper-containing product.

Fabricator: A company that processes, treats, mixes, formulates, handles, and otherwise manipulates copper and copper alloys.

Management system: A management system is a set of operational procedures, practices, plans, and related documents that are established to implement policies and fulfilment of tasks required to achieve an objective, including the avoidance and management of adverse issues related to the areas covered by the Criteria, or "aspects" associated with a business's activities.

For these areas, the steps involved in a management system typically include identification and assessment of issues; setting of objectives, developing action plans, and assigning responsibilities; implementing action plans through establishing procedures, communication, and training; monitoring and tracking progress; and taking action to correct and prevent identified issues. The final step is a review of the aspects and objectives, adjusting the action plans as needed and recording 'lessons learned' for future training. Management systems can be integrated and address more than one aspect.

Manufacturer: A company that manufactures products containing copper and is downstream of a fabricator.

Materials: All copper-containing primary, and/or *secondary material* received, held, sent, and/or processed during the assessment period.

Material accounting period: A defined period of time during which the Copper Mark copper are accounted for and reconciled.

⁴ OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris. p. 13.

Material accounting system: A system to track and record the total inputs and outputs of copper.

Outsourcing contractors: It is common for companies to relinquish physical custody of copper that is owned or controlled by the *site* for the purpose of another company processing, treating, manufacturing, or otherwise manipulating the copper. When Copper Mark copper is physically held by a company not in the control of the *site*, i.e., activities are contracted, outsourced, or tolled, there is a risk that a link in the physical chain of custody is broken.

Pre-consumer material: Material diverted from the waste stream during the manufacturing process. Excluded is the reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it. (Source: ISO 14021:1999)

Point of origin: for primary material, the point of origin is the mine. For secondary material, the point of origin is defined based on the type of secondary material:

- Run-around: The *site* undergoing the assessment against the CoC Standard.
- Pre-consumer material: The manufacturing entity from which the *material* is diverted.
- Post-consumer material: The entity that first extracts the *material* from the post-consumer product.

Post-consumer material: Material generated by households or by commercial, industrial, and institutional facilities in their role as end-users of the product that can no longer be used for its intended purpose. This includes returns of materials from the distribution chain. (Source: ISO 14021:1999)

Primary materials: Mined (copper bearing ore or primary processed material which has never been previously refined), refined, or semi-fabricated copper or copper alloys.

Refiner: For the purpose of this Standard, a company performing a process of purification to produce refined copper, specifically grade A copper cathode.

Risk mitigation strategies: Risk mitigation strategies respond to identified risks of adverse impacts and actual adverse impacts, consistent with the policy and appropriate to the type and scale of the risks of adverse impacts and actual adverse impacts and the company's position along the supply chain. Risk mitigation strategies include:

- Continuing trade or temporarily suspending trade while pursuing ongoing mitigation of the risk.
- Immediately suspending trade or disengagement with the supplier where the company identifies a reasonable risk of adverse impacts or actual adverse impacts that are deemed too severe (these include serious human rights abuses and support to non-state armed groups).

Run-around scrap: Scrap sourced from internal operations at the site undergoing the assessment against the CoC Standard. This is differentiated from other pre-consumer material that is originated at another facility.

Secondary material: For the purpose of this standard, secondary materials are defined as run-around scrap, pre-consumer material scrap and post-consumer material.

Site: A site is the physical place where operations involved in the mining, refining, or other intermediary steps for copper production, including, but not limited to, mining, solvent extraction and electrowinning (SX/EW), concentration, blending, washing, roasting, smelting, alloying or refining take place. A site may also be a facility where copper and copper alloy materials are processed, treated, mixed, formulated, handled and otherwise manipulated.

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 will generally be treated as one site.

Smelter: A company treating minerals or intermediate materials in order to produce metal products for refining. A smelter may treat intermediate material resulting from the processing of either mined material or recycled material.

Trader: A company that buys and sells copper or copper-containing products. A trader may or may not have physical custody of the product at any given time.

12 Resources

The Copper Mark thanks these systems for their support throughout the drafting process. We have used publicly available information from these organizations to inform the CoC Standard.

- [Aluminium Stewardship Initiative](#) (ASI)
- [Better Cotton Initiative](#) (BCI)
- [Forest Stewardship Council](#) (FSC)
- [ISEAL Alliance](#)
- [Responsible Jewellery Council](#) (RJC)
- [RoundTable on Sustainable Palm Oil](#) (RSPO)

Annex I

Copper Mark CoC transfer record

The information provided within is in conformance with the Copper Mark Chain of custody Standard.

| | | | |
|---|--|---|--|
| Date of issue: | | CoC transfer record Reference Number: | |
| Supplier Information | | | |
| Name: | | Address: | |
| Unique ID from the Copper Mark: | | Name of Responsible Person: | |
| Customer Information | | | |
| Name: | | Address: | |
| Unique ID from the Copper Mark (if applicable): | | | |
| Copper Information | | | |
| Description of <i>Copper Mark copper</i> : | | Weight: | |
| Separation / Mass balance | | Separation only: full chain of <i>sites</i> involved in the production using separation model | |