



The Copper Mark Summary Assessment Report

Copper Producer Information

Name of the Copper Producer Site	Atlantic Copper Smelter & Refinery
Unique identifier provided by the Copper Mark	P0005
Address	Avenida Francisco Montenegro, s/nº. 21001 Huelva, Spain
Country of Operation	Spain
Types of operations included in scope (<i>select all that apply</i>)	
Mining	<input type="checkbox"/>
Concentrate blending	<input checked="" 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)	10/12/2020
Expiry Date of the Copper Mark (dd/mm/yyyy)	10/12/2023

Assessment Information

Name of the Lead Assessor	David Shirley
Name of the Assessment Firm (if applicable)	Corporate Integrity Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	23/09/2020 – 24/09/2020 Atlantic Copper completed an on-site assessment against the Joint Due Diligence

	Standard for Copper, Lead, Nickel and Zinc 30 November - 2 December 2021.
Assessment Period	01/09/2019 – 31/08/2020
Summary of the Assessment Methodology	<p>The Corporate Integrity team conducted an assurance review between Sept 23rd and 24th 2020. Due to the international COVID-19 crisis, the review was carried out via live video conferencing. Recognising the limitations in conducting remote video conference reviews, the assurance procedures were adjusted accordingly.</p> <p>Note that this is part of a multi-year engagement and the Corporate Integrity team has conducted on-site ICMM assurance at Atlantic Copper in 2012, 2017 and 2019 and a video conference review in 2016. These reviews have resulted in extensive coverage of subject matter and physical site visits to operational facilities and relevant off-site projects.</p>
Summary of the Assessment Activities	<p>The work was carried out in accordance with Corporate Integrity Ltd's assurance procedures, which involve:</p> <ol style="list-style-type: none"> 1. Desktop review and scoping for site review including: <ul style="list-style-type: none"> • Review of related corporate policies and their alignment to the scope of the assurance. • Review of site Risk Register • Review of the site self-assessment and supporting evidence submitted. 2. Site Review including: <ul style="list-style-type: none"> • Review of scope related risks at the site, including processes for evaluation and prioritisation. This involves interviews with senior management and all relevant departments. • Review of the systems and approaches that are used to manage scope related risks and issues. This involves interviews with relevant departments and personnel, review of additional documented evidence and physical observations (at operation and in local communities). • Review of procedures for the collection and assimilation of relevant performance information • Close out meeting with management team, which includes presentation of findings and discussion on site's plans to close gaps to achieve 'meets' for all CM requirements and other improvement opportunities. <p>Assurance Outcomes including:</p> <ul style="list-style-type: none"> • Corporate Integrity provides an assurance statement based on the self-assessment. • Corporate Integrity provides a site management report which includes good practices, risks and improvement opportunities.

Equivalencies and Non-Applicable Criteria

The following criteria were confirmed to be not applicable to the Copper Producer:	19. Tailings Management 22. Mine Closure and Reclamation 25. Artisanal and Small-Scale Mining 27. Security and Human Rights 28. Indigenous Peoples' Rights 29. Land Acquisition and Resettlement
The following equivalent systems were applied (add more rows as appropriate)	
Equivalent System <i>(Name, date of assurance / certification)</i>	Criteria Covered by Equivalency
ICMM PE Assessment 23/09/2020 – 24/09/2020	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 RRA for criteria 2. Business Integrity, 10. Working Hours, and 11. Remuneration.

Summary of Findings

Criterion	Rating <i>Fully meets, partially meets, does not meet, not applicable</i>	Comments
1. Legal Compliance	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Atlantic Copper has systems in place to ensure compliance with all applicable laws.
2. Business Integrity	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Atlantic Copper has a management system that prohibits and effectively prevents bribery, corruption and anti-competitive behavior. The system was

		confirmed to also prohibit facilitation payments.
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>Atlantic Copper has a structured stakeholder engagement and evaluation process and a working grievance mechanism in place.</p> <p>Grievances can be submitted online here.</p>
4. Business Relationships	Fully Meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>The Supplier Code of Conduct is complemented by a comprehensive screening, monitoring, and training system.</p>
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>Atlantic Copper 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 Supplier Code of Conduct and business relationships practices.</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>Atlantic Copper has a system in place that prevents the use of any forms of forced labor and participation in acts of human trafficking complemented by the Supplier Code of Conduct and business relationships practices.</p>
7. Freedom of Association and Collective Bargaining	Fully Meets	The Independent Review confirmed that the site meets the requirement as

		<p>validated through the ICMM PE Assessment.</p> <p>Atlantic Copper 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper has systems in place to continually monitor progress to ensure the implementation of a policy on gender equality in the workplace. The policy is included in the Principles of Business Conduct and Human Rights policies.</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>Atlantic Copper 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 confirmed that the site meets the requirement as</p>

		<p>validated through the ICMM PE Assessment.</p> <p>Atlantic Copper 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 Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper is certified against OHSAS 18001.</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>Atlantic Copper has a grievance mechanism available to all employees.</p>
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>Atlantic Copper is certified against ISO 14001.</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>Atlantic Copper has a process to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting standards.</p> <p>More information available 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>Atlantic Copper has a process to implement and quantify energy efficiency improvements and increased use of renewable energy to reduce total</p>

		energy consumption and / or energy intensity.
17. Freshwater Management and Conservation	Fully Meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper 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	Not applicable	
20. Pollution	Fully Meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper has a system in place to implement the mitigation hierarchy to avoid, minimize, reduce and compensate for the adverse impacts of pollution on human health and the environment.</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> <p>Atlantic Copper 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</p>

		Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless specifically and legally permitted.
22. Mine Closure and Reclamation	Not applicable	
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>Atlantic Copper 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper implements the UN Guiding Principles on Business and Human Rights including human rights due diligence..</p>
27. Security and Human Rights	Not applicable	
28. Indigenous Peoples' Rights	Not applicable	
29. Land Acquisition and Resettlement	Not applicable	
30. Cultural Heritage	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.

		Atlantic Copper 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..
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>Atlantic Copper completed an on-site assessment against the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc 30 November -- 2 December 2021.</p> <p>Atlantic Copper has a process to conduct due diligence in mineral supply chains in accordance with the OECD Due Diligence Guidance.</p> <p>The process is appropriate to the nature, scale, and operational context.</p> <p>Atlantic Copper makes reasonable efforts in completing due diligence.</p>
31.a. Management System	Fully meets	<p>Atlantic Copper has a strong management system to support supply chain due diligence including supply chain governance and the necessary resources for implementation.</p> <p>This was confirmed through a review of the policy and implementing procedures, records for example of the Responsible Sourcing of Minerals Committee, training records, and reviewsews with management.</p> <p>The policy is available here.</p>
31.b. Red Flag Identification Process	Fully meets	<p>Atlantic Copper has a process to identify red flags, including a process to identify conflict-affected and high-risk areas.</p> <p>This was confirmed through a review of procedures, the risk tool, supplier KYC documents, contracts, and interviews with management.</p>
31.c. Risk Assessment Process	Fully meets	Atlantic Copper has a process in place to assess identified risks, which includes a combination of desk research, supplier engagement, expert profiles, and on-the-ground assessments as appropriate.

			<p>This was confirmed through a review of due diligence records such as country of origin and import / export documents, reports, meeting minutes, on-the-ground assessment plans, and interviews with management.</p>
	31.d. Risk Management Process	Fully meets	<p>Atlantic Copper has a process to manage risks that includes corrective action plans and timelines, monitoring, capacity building, and stakeholder engagement. The mitigation has not been tested in the case where on-the-ground assessments take place due to Covid-19 restrictions. The rating of “fully meets” is conditional on reviewing the implementation of this element of the system when Covid-19 restrictions allow.</p> <p>This was confirmed through review of records such as meeting minutes, communications with suppliers, action plans, and interviews with management.</p>
	31.e. Public Reporting*	Fully meets	<p>Atlantic Copper has a Step 5 report that covers the relevant elements of the management system, risk identification process, risk assessments, and risk management.</p> <p>The Step 5 report is available here.</p>
32. Transparency and Disclosure		Fully Meets	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Atlantic Copper reports annually on environmental, social and governance performance in line with internationally recognized standards and publicly supports the implementation of EITI.</p> <p>The Corporate annual report is available here. Atlantic Copper also has a 2020 Social Responsibility Report available here.</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 18/09/2022.	<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 18/09/2022.	<input type="checkbox"/>
The site misses some or all of the applicable applicable requirements of the Risk Readiness Assessment and has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	<p>The Copper Mark does not accept remote assessments. However, in light of the Covid-19 pandemic, the Copper Mark reviewed the assessment in the context of the Covid-19 Policy. The Copper Mark determined there were sufficient onsite engagements within a reasonable period of time conducted at the site combined with the adjustments of the process allowing for a single-time acceptance of this remote assessment. The next assessment to be used for purposes of the Copper Mark must be conducted on-site.</p> <p>Process adjustments:</p> <ol style="list-style-type: none"> 1) Where the following conditions are all met the assessor considered that we have detailed knowledge of the site and operations sufficient to provide remote assurance: <ol style="list-style-type: none"> (a) A physical site visit by at least one currently-accredited CopperMark assessor has been made in previous three years; and (b) The site has been operating to ICMM Sustainable Development principles for the last three years or more. 2) During the course of the remote assurance review, the assessors may identify specific

	<p>areas which will need to be covered at site during the next physical site visit, which should be conducted within an 18-month period. For example, if:</p> <ul style="list-style-type: none"> (a) There have been material changes to the operation, management or risk profile (as defined by the site Risk Register); and (b) There have been incidents having a material adverse effect on performance such as safety and environmental, business integrity, human rights related incidents; and (c) There have been material external factors (such as substantial new regulations or significant reputational decline) directly related to the operation. <p>3) In the event that a follow up visit is not possible because of ongoing COVID-19 travel restrictions or because a site visit could not otherwise be achieved, the assurance status will need to be reviewed and a reassessment may be required.</p> <p>4) On a site by site basis the assessor will require that all equivalent third party assurance remains valid during this period (e.g. ISO14001, OSHAS18001).</p>
Additional comments:	None