



The Copper Mark Summary Assessment Report

Copper Producer Information

Name of the Copper Producer Site	Miami Smelter & Mine
Unique identifier provided by the Copper Mark	P0007
Address	5701 New St. 237 Claypool, AZ 85532
Country of Operation	United States of America
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 checked="" type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input type="checkbox"/>
Other (<i>please explain</i>)	Rod mill, copper fabrication

Copper Mark Information

Date the Copper Mark is awarded (dd/mm/yyyy)	20/01/2021
Expiry Date of the Copper Mark (dd/mm/yyyy)	20/01/2024

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)	13/10/2020 – 14/10/2020

Assessment Period	01/10/2019 – 30/09/2020
Summary of the Assessment Methodology	<p>The Corporate Integrity Team conducted an assurance review between 13th and 14th October 2020. Due to the international COVID-19 crisis, the review was carried out via live video conferencing. Recognising the limitations in conducting remote video conferencing 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 previously conducted physical site assurance visits for ICMM SD framework scope in 2014 and in 2017 with the same team.</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:	25. Artisanal and Small-Scale Mining
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 13/10/2020 – 14/10/2020	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. Miami Smelter & Mine 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. Miami Smelter & Mine 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	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Miami Smelter & Mine has a structured stakeholder engagement and evaluation process and a

		<p>working grievance mechanism in place.</p> <p>Grievances can be submitted online here or by email to communityaffairs@fmi.com.</p>
4. Business Relationships	Partially Meets (improvements overseen by ICMM)	<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. Opportunity for improvement to provide for additional due diligence requirements for suppliers and contractors off-site is currently under development.</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>Miami Smelter & Mine 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>Miami Smelter & Mine 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	<p>The Independent Review confirmed that the site meets the requirement</p>

		<p>as validated through the ICMM PE Assessment.</p> <p>Miami Smelter & Mine 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>Miami Smelter & Mine 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>Miami Smelter & Mine 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>Miami Smelter & Mine 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 validated through the ICMM PE Assessment.</p> <p>Miami Smelter & Mine 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>Miami Smelter & Mine 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>Miami Smelter & Mine 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>Miami Smelter & Mine 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>Miami Smelter & Mine 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>Miami Smelter & Mine has a process to implement and quantify energy efficiency improvements and increased use of renewable energy to reduce total energy consumption and / or energy intensity.</p>
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>Miami Smelter & Mine 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>Miami Smelter & Mine 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Miami Smelter & Mine has systems in place to monitor and close tailings impoundments while minimizing adverse impacts to human health and the environment in line with internationally recognized standards.</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>Miami Smelter & Mine has a system in place to implement the mitigation</p>

		<p>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>Miami Smelter & Mine 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Miami Smelter & Mine 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 confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Miami Smelter & Mine 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>Miami Smelter & Mine has a system in place to identify community needs in consultation with affected communities, develop a plan, and</p>

		commit resources to support community development.
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>Miami Smelter & Mine implements the UN Guiding Principles on Business and Human Rights including human rights due diligence..</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>Miami Smelter & Mine implements the Voluntary Principles on Security and Human Rights when engaging with private or public security forces..</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>Miami Smelter & Mine has a management system in place to respect the rights of Indigenous Peoples, including FPIC; avoid adverse impacts on Indigenous Peoples' lands, livelihoods, resources, and cultural heritage; and develop and implement an Indigenous Peoples' engagement plan.</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>Miami Smelter & Mine has a policy to to explore all viable alternative project designs to avoid and/or minimize land acquisition and physical or economic displacement and to implement a resettlement action plan to fairly address and</p>

		compensate for residual adverse impacts in case of land acquisition and resettlement.
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>Miami Smelter & Mine 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	Partially Meets (improvements overseen by ICMM)	<p>The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.</p> <p>Miami Smelter & Mine implements the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas. Opportunity for improvement to demonstrate implementation across suppliers and materials.</p> <p>Step 5 report 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>Miami Smelter & Mine reports annually on environmental, social and governance performance in line with internationally recognized standards and publicly supports the implementation of EITI.</p> <p>Annual 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 type="checkbox"/>
The site is found to fully meet or partially meet all applicable requirements of the Risk	<input checked="" type="checkbox"/>

<p>Readiness Assessment and has committed to continuous improvement at the site to fully meet all applicable Copper Mark Criteria by 18/09/2022.</p>	
<p>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.</p>	<input type="checkbox"/>
<p>The site misses some or all of the applicable applicable requirements of the Risk Readiness Assessment and has not committed to continuous improvement.</p>	<input type="checkbox"/>
<p>Limitations:</p>	<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> <p>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:</p> <p>(a) A physical site visit by at least one currently-accredited CopperMark assessor has been made in previous three years; and</p> <p>(b) The site has been operating to ICMM Sustainable Development principles for the last three years or more.</p> <p>2) During the course of the remote assurance review, the assessors may identify specific 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> <p>(a) There have been material changes to the operation, management or risk profile (as defined by the site Risk Register); and</p> <p>(b) There have been incidents having a material adverse effect on performance such</p>

	<p>as safety and environmental, business integrity, human rights related incidents; and</p> <p>(c) There have been material external factors (such as substantial new regulations or significant reputational decline) directly related to the operation.</p> <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