



The Copper Mark Summary Report

Participant Information

Name of the Site	Minera Antucoya
Unique identifier provided by the Copper Mark	P0031
Address	Ruta 5, Km 1518, Camino de Acceso Antucoya, María Elena
Country of Operation	Chile
Copper products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathode
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper
Metals included in scope of Criterion 31 (this must be all or a sub-set of the metals produced on site)	Copper
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input 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>)	

Equivalent Systems

The following equivalent systems were applied:

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
NA	<p>The assurance / certification was confirmed to be:</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 	NA

Independent Site Assessment Information

Name of the Lead Assessor	Rachelle Jackson and Juliana Villegas
Name of the Assessment Firm (if applicable)	Arche Advisors
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	14 – 17 June 2022
Assessment Period	1 June 2021 – 31 May 2022
Summary of the Assessment Methodology	Methodology included data gathering through site visits to the mine and community; observation, worker and management interviews, and document review of policies, procedures, and records related to

	<p>each of the specific Copper Mark criteria. A sampling approach was used related to document selection and worker selection, including contractor agencies.</p> <p>Greater specifics are included in detail in each criteria section.</p> <p>Number of permanent workers: 800</p> <p>Number of contract workers: 1500</p> <p>Worker interviews: 28</p> <p>Community interviews: 11</p> <p>Union representatives were also interviewed.</p>
<p>Summary of the Assessment Activities</p>	<p>Day 1</p> <ul style="list-style-type: none"> • Opening meeting • Mine tour • Management interviews • Document review <p>Day 2</p> <ul style="list-style-type: none"> • Management interviews • Worker and contractor interviews • Union interviews • Due diligence in mineral supply chains assessment (using Joint Due Diligence Standard) • Document review <p>Day 3</p> <ul style="list-style-type: none"> • Community interviews <p>Day 4</p> <ul style="list-style-type: none"> • Wrap up • Closing meeting

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>Antucoya uses corporate level legal department to oversee legal compliance on an ongoing basis. The system is in place and</p>

		<p>there is an understanding of this system at the site level. This is confirmed by interviews with management, review of documents, and interviews with workers to check an understanding of the legal requirements related to their areas of work.</p>
2. Business Integrity	Fully meets	<p>There are corporate policies in place related to business integrity including policies against bribery, corruption, promoting ethical business practices, and prohibiting facilitation payments.</p> <p>Interviews with management and employees confirmed awareness of the policies and procedures, including how to raise an issue. This was also confirmed through a review of documents and records.</p>
3. Stakeholder Engagement*	Fully meets	<p>Stakeholder mapping is carried out in line with public reporting obligations under the GRI guidance. Managers confirm knowledge and execution of stakeholder mapping and engagement activities, including the grievance mechanism.</p> <p>Interviews with stakeholders also confirmed implementation of the engagement activities and awareness of the grievance mechanism.</p> <p>The grievance mechanism can be found here.</p>
4. Business Relationships	Fully meets	<p>Antucoya has policies promoting and committing business partners and suppliers to responsible business practices. Contractors in particular are asked to sign commitments and are subject to monthly audits on issues of wage and hour compliance, forced and child labor.</p> <p>This was confirmed through a review of documents, records, and interviews with management.</p>
5. Child Labor	Fully meets	<p>Antucoya has and implements policies and procedures on no child labor, minimum wage for hire, and general recruitment and hiring practices, including unintentional hiring of minors.</p> <p>Site observations confirm no children were on site. Interviews with management and</p>

		workers confirm the recruitment practices and child labor policies are in place.
6. Forced Labor	Fully meets	<p>Antucoya has a management system in place to prohibit forced labor. There are policies and practices in place to avoid issues such as document retention, restricted movement, and mandatory overtime as examples.</p> <p>Interviews with management confirm implementation of the system. Interviews with workers demonstrate understanding and training on forced labor issues and how to raise a complaint. No workers were observed as working against their will.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>Antucoya has public policies to respect freedom of association and collective bargaining. There are collective bargaining agreements in place between the company and the unions, which were reviewed. Workers are made aware of the presence of unions at the time of hire but are neither pressure to join or not join them.</p> <p>This was also confirmed through interviews with management, workers, union representatives, review of training material, and a review of union-company meeting notes, among other documents.</p>
8. Discrimination	Fully meets	<p>Antucoya has a system in place to prohibit discrimination and promoting equality in the workplace embedded in policies, handbooks, and public reporting.</p> <p>This was confirmed through interviews with management and workers. Workers expressed awareness of the policies and how to access them, how to raise complaints, and that they had not been subjected to discrimination. Interviews with community members also confirmed the company does not discriminate against individuals or groups.</p>
9. Gender Equality	Fully meets	<p>Antucoya has a system in place to promote gender equality is embedded in the diversity and inclusion policy. There are statistics and goals in place to increase diversity and inclusion. The current focus is to increase recruitment of women, people with disabilities, and people from diverse</p>

		<p>backgrounds, with pilots and initiatives in place to carry out those goals.</p> <p>Management interviews and interviews with workers confirmed knowledge of the policies and procedures, training, and implementation. Women workers who were interviewed indicated they treated in the same way, that they have the same opportunities to advance in their positions, and that they did not imagine they would have the opportunity to operate heavy machinery under the same conditions as men.</p>
10. Working Hours	Fully meets	<p>Antucoya has a system in place that aligns with local law. The site operates on shifts that are approved by the government. Working hours are limited to 45 hours per week through the shift rotation.</p> <p>This was confirmed through review of documents and records including company shift approvals from the government, attendance records, collective bargaining agreements, and training materials. It was further confirmed by interviews with workers and management.</p>
11. Remuneration	Fully meets	<p>Antucoya has a system to manage remuneration and pays well above the minimum wage to meet a commitment to pay a living wage. The systems accounts for a process to manage contractor compliance.</p> <p>This is confirmed through a review of documents and records, including a public commitment to “ethical payment,” wage records, interviews with management and with workers to discuss implementation of the processes including treatment of overtime pay in accordance with local law.</p>
12. Occupational Health and Safety	Fully meets	<p>Antucoya has an occupational health and safety management system materially aligned with ISO 45001.</p> <p>This was confirmed through a review of documents, a site visit to confirm a safe work environment, interviews with workers to confirm training and implementation of processes.</p>

13. Grievance Mechanism	Partially meets	<p>Antucoya has a working grievance mechanism embodied in the platform “Tu Voz.” Management confirmed how the mechanism worked and employees confirmed knowledge of the system.</p> <p>The following opportunities for improvement were identified:</p> <ul style="list-style-type: none"> • Ensure training and awareness raising to contract workers, preferably directly rather than through administrators • Provide transparency about the number of grievances that are received and resolved to workers
14. Environmental Risk Management	Fully meets	<p>Antucoya has a management system in place to address environmental risks. This was confirmed through document review, interviews with management and workers, and site observations.</p> <p>Of note is that in the areas where the particulate material is produced, there are different control measures that help to reduce this impact.</p>
15. Greenhouse Gas (GHG) Emissions*	Fully meets	<p>Antucoya has a climate change strategy in place since 2020.</p> <p>At company level, a GHG reduction goal of saving 300,000 tons of CO2 was in place for 2018-2022 and was reached in 2021. As a result, the company announced new targets of carbon neutrality by 2050, in line with Chile’s national commitment, and a shorter-term target of 30% reduction in emissions by 2025.</p> <p>Reporting is made in line with international reporting standards and externally verified.</p> <p>In addition to document review, interviews with management and relevant workers confirmed the strategy is implemented.</p> <p>More information is available here.</p>
16. Energy Consumption	Fully meets	<p>Antucoya has a system to reduce energy use consisting of a policy, operational implementation, and energy efficiency projects.</p> <p>This was confirmed through document review, interviews with management and</p>

		workers, and site observations including observations of energy efficiency projects.
17. Freshwater Management and Conservation	Fully meets	<p>Antucoya has processes in place to manage and conserve freshwater.</p> <p>Antucoya uses seawater in both mining and electrowinning plant. It also has reverse osmosis plant to produce drinking water for the camp. All the water used in camps and offices is collected for treatment in the wastewater treatment plant and is used to moisten our internal roads and the open pit loading area.</p> <p>This was confirmed through document review, interviews with management and workers, and site visits to relevant operations.</p>
18. Waste Management	Fully meets	<p>Antucoya has systems in place to manage waste with a view to reduce waste generation and recycle waste where possible. The waste management plan is approved by the local government and the site has sectoral permits to carry out management and disposal of all waste types.</p> <p>Antucoya complies with legal guidelines for hazardous waste management.</p> <p>This was confirmed through document review, interviews with management and workers, and site observations to relevant operations, including the hazardous substance warehouse, hazardous waste warehouse, and sanitary landfill.</p>
19. Tailings Management	Not applicable	As confirmed by the site assessment, there are no tailings systems at Antucoya.
20. Pollution	Fully meets	<p>Antucoya has a system in place to manage pollution in line with the mitigation hierarchy. There are established objectives that are reviewed annually to reduce the use of hazardous substances, minimize the associated risks, and replace them with non-hazardous alternatives when possible.</p> <p>There is also a contingency and emergency plan to address incidents and accidents. Workers and stakeholders are trained on how to contribute to a reduction in pollution.</p> <p>This was confirmed through document review, interviews with managers and</p>

		employees, and site observations of the different work areas.
21. Biodiversity and Protected Areas	Fully meets	<p>Antucoya has a process in place to implement the mitigation hierarchy and incorporate biodiversity management into impact assessments, planning, and operations.</p> <p>This was confirmed through document review, interviews with management and workers, and site observations. The follow-up and control carried out to monitor change was observed. Management plans that protect biodiversity includes a complaint mechanism available to all interested parties.</p>
22. Mine Closure and Reclamation	Fully meets	<p>Antucoya has a mine closure plan that covers economic and environmental parameters that cover the life cycle of the mine and its post closure phase. The closure plan was developed with the participation of stakeholders.</p> <p>This was confirmed through document review and interviews with responsible persons.</p>
23. Community Health and Safety	Fully meets	<p>Antucoya has a process in place to identify potential negative health and safety impacts on the community and mitigate those potential impacts. This is done with participation of stakeholder through development dialogues, workshops, and transparent awareness raising of health and safety policy and complaints mechanism.</p> <p>This was confirmed through interviews with community members who reported that the company does not generate negative impacts on the community and provides fundamental support to help improve the quality of life of the inhabitants.</p> <p>This was further confirmed through document review and interviews with management.</p>
24. Community Development	Fully meets	<p>Antucoya has a system in place to carry out community development. Document review and interviews with those responsible and community representatives demonstrate an understanding of the development initiatives, how affected communities were identified and consulted, and how executed projects are monitored and evaluated.</p>

		The Maria Elena community in particular noted the communication with the site and the important contributions to the needs of the community in a professional and diligent manner.
25. Artisanal and Small-Scale Mining	Not applicable	As confirmed by the site assessment, there is no ASM in the area of influence.
26. Human Rights	Fully meets	<p>Antucoya has a human rights policy and conducts human rights impact assessments, integrating the findings into the operations. The system includes a grievance mechanism available to stakeholders to report on human rights violations.</p> <p>This is confirmed through document review, interviews with management, workers, and stakeholders.</p> <p>No particular issues were known to be reported as human rights violations in the past.</p>
27. Security and Human Rights	Fully meets	<p>Antucoya follows corporate policies on security and human rights following the UN Voluntary Principles. This includes a policy, training, and evaluation.</p> <p>This is confirmed through interviews with security personnel, management, and document review.</p>
28. Indigenous Peoples' Rights	Not applicable	As confirmed by the site assessment and environmental impact assessment, there are no indigenous communities within the area of influence.
29. Land Acquisition and Resettlement	Not applicable	As confirmed by the site assessment, there are no adjacent communities to the site.
30. Cultural Heritage	Fully meets	<p>Antucoya has a system in place to protect cultural heritage that includes participation of community members.</p> <p>This was confirmed through a review of documents such as the policy, archaeological mapping of the region, environmental impact assessments that address the topic, and excavation permits, in addition to interviews with management and stakeholders.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	Antucoya has a simple supply chain, with no suppliers. It has a due diligence system related to the implementation of both the

		OECD Due Diligence Guidance and the UK Modern Slavery Act.	
	31.a. Management System	Fully meets	<p>Antucoya has a due diligence system in place proportional to the size and complexity of its operations.</p> <p>The system includes a policy, resource allocation, responsible persons, training to workers, and a process to identify red flags.</p> <p>The policy can be found here and here.</p>
	31.b. Red Flag Identification Process	Fully meets	Antucoya utilizes the corporate-level processes to identify conflict-affected and high-risk areas. A red flag assessment is conducted and yields no red flags.
	31.c. Risk Assessment Process	Not applicable	No red flags were identified.
	31.d. Risk Management Process	Not applicable	No red flags were identified
	31.e. Public Reporting*	Fully meets	<p>Antucoya has a “step 5” report that meets the requirements of the standard given the size and complexity of the operation and its supply chain.</p> <p>It is available here.</p>
	32. Transparency and Disclosure*	Fully meets	<p>Antucoya publicly reports on EST performance, payments to government, and commitments to EITI, primarily at the corporate level.</p> <p>This was confirmed through document review, interviews with management, and interviews with stakeholders to confirm performance.</p> <p>Reports are available 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"/>

<p>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 8 November 2023.</p>	<input checked="" type="checkbox"/>
<p>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 8 November 2023.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>
<p>Limitations:</p>	
<p>Additional comments:</p>	

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 assessors' conclusion and awards the Copper Mark as follows

<p>Date the Copper Mark is awarded (dd/mm/yyyy)</p>	<p>25 July 2022</p>
<p>Expiry Date of the Copper Mark (dd/mm/yyyy)</p>	<p>24 July 2025</p>