



## The Copper Mark Summary Report

### Site Information

Name of the Site	Vale Copper Cliff Nickel Refinery
Unique identifier provided by the Copper Mark	S006
Address	175 Industrial Rd, Sudbury, ON P3E 6A4
Country of Operation	Canada
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathodes, nickel pellets and powder
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, nickel
Metals included in scope (This must be all, or a sub-set of the metals produced on site)	Copper, nickel
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other ( <i>please explain</i> )	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>

Ports	<input type="checkbox"/>
Other (please explain)	

### Equivalency Check

Upon receiving the pre-assessment checklist, the Copper Mark did a review of equivalent certificates and third-party assurances.

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	NA	NA

### Independent Site Assessment Information

Name of the Lead Assessor	Kaido Katalsepp
Name of the Assessment Firm (if applicable)	Arche Advisors
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	9-10 June 2022
Assessment Period	10 June 2021 – 10 June 2022
Summary of the Assessment Methodology	The assessment was conducted in accordance with ISO19001:2011 Standard. Auditor sampled 10% of primary material transactions and 10% of secondary material transactions. Sampling was not applied for supplier files review and supply chain review - meaning all supplier files and supply chains were assessed. Based on auditor`s judgment the sample was sufficient. Auditor used triangulation method, including site tour, interviews and documentation review to verify the conformance against the JDD Standard.
Summary of the Assessment Activities	On-site assessment at Vale Copper–Cliff Refinery and Smelter was conducted on June 9-10, 2022. Assessment activities started with Opening Meeting on June 9, 2022, with the presence of management representatives, responsible for implementation of Due Diligence Management System. Assessment scope, methodology and activities were explained. Access to requested information was granted by the representatives. Opening meeting was followed by Facility tour, review of Policies and Procedures, review of selected transactions, Management Interview and Closing Meeting. Assessor communicated preliminary findings and explained, that final report

	will be issued later. After the assessment additional clarifications were requested by assessor and these were provided by auditee.
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### Summary of Findings

Criteria	Rating	Comments
1. Management System	Partially meets	<p>Copper Cliff has a medium complexity supply chain, sourcing mined and recycled material from tens of suppliers worldwide.</p> <p>There is a due diligence management system in place including responsible sourcing policies embedded in numerous documents including the code of conduct, human rights policy, sustainability policy, and risk management policy, among others. There is also a dedicated Commitments Page, which can be found <a href="#">here</a>.</p> <p>The policy is supported by procedures to carry out mineral supply chain due diligence. This includes clear roles and responsibilities for accountable persons, a Metals Accounting Standard and process, demonstrated continual improvement, training, and adequate dedicated resources proportional to the size and complexity of the operations.</p> <p>Copper Cliff also has a process to receive and respond to grievances related to violations of the code of conduct. The Whistleblower Channel can be found <a href="#">here</a>.</p> <p>This was confirmed through review of policies, procedures, organizational charts, training material, records, and interviews with relevant personnel.</p> <p>The following were identified as areas for improvement:</p> <ul style="list-style-type: none"> <li>• Policy <ul style="list-style-type: none"> <li>○ Clearly commit to carry out an independent third-party audit of the due diligence system</li> <li>○ Clearly commit to support the principles of the Extractive Industry Transparency Initiative (EITI)</li> <li>○ Identify applicable minerals</li> </ul> </li> <li>• Training (minor improvement): carry out dedicated training specific to the OECD due diligence guidance and the Joint Due Diligence Standard</li> </ul>

<p>2. Red Flag Identification Process</p>	<p>Partially meets</p>	<p>Copper Cliff has a process in place to identify red flags.</p> <p>Record review confirms Copper Cliff has a process to determine, record and confirm the weight for each batch of material received in line with the established Metals Accounting Standard.</p> <p>Copper Cliff has a process to collect information from suppliers. In particular, Vale's standard contract template includes provisions for: (i) compliance with Supplier's code of conduct which shall be aligned with Vale's Supplier Code of Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high risk and the ten principle of the United Nations Global compact with respect to human rights, labor, environment and anti-corruption and (ii) Vale's right to preform due diligence to assess Supplier's compliance with Vale's policies, including on responsible minerals supply chains, through site visits and inspection production, documents and records review.</p> <p>At the corporate level, Vale has a procedure to identify conflict-affected and high-risk areas using a combination of resources.</p> <p>On red flag related to material origin was identified during the assessment period.</p> <p>The following were identified as areas for improvement:</p> <ul style="list-style-type: none"> <li>• The procedure to identify conflict-affected and high-risk areas, including the criteria, resources and thresholds applied must be documented</li> <li>• In conducting red flag assessments, transportation routes through conflict-affected and high-risk areas must be considered a red flag</li> </ul>
<p>3. Risk Assessment Process</p>	<p>Fully meets with observation</p>	<p>Copper Cliff has a process to identify risks begins with risk questionnaires, and evaluation by corporate integrity. If risks are identified, further analysis will be completed by normative areas.</p> <p>Copper Cliff has a reasonable procedure to determine the need for on-the-ground assessments for high-risk suppliers. Implementation will be verified during the next assessment, when on-the-ground assessments have already been carried out.</p> <p>No evidence of risks of adverse impacts or actual adverse impacts have been identified in company's supply chains.</p>

4. Risk Management Process	Fully meets	Copper Cliff has not identified any risks of adverse impacts or actual adverse impacts.  Nonetheless, Copper Cliff utilizes the corporate level Risk Management Policy should risks be identified. This defines when relationships with suppliers should be suspended, terminated, or ongoing while mitigation efforts are in effect.
5. Public Reporting	Fully meets, with observation	Copper Cliff has a “step 5” report that meets the requirements of the standard and is available <a href="#">here</a> .  There is an observation that: <ul style="list-style-type: none"> <li>The report should include the description of system of control and transparency designed and implemented to collect and retain information necessary for red flags identification.</li> </ul>

### Conclusions

Performance Determination	
The site is found to fully meet the conformance criteria of the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (Joint Due Diligence Standard).	<input type="checkbox"/>
The site is found to fully meet or partially meet the conformance criteria of the Joint Due Diligence Standard and has committed to continuous improvement at the site to fully meet the conformance criteria by 16 May 2023.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the conformance criteria of the Joint Due Diligence Standard, and has committed to continuous improvement at the site to fully meet all conformance criteria by 16 May 2023.	<input type="checkbox"/>
The site misses some or all of the conformance criteria of the Joint Due Diligence Standard and has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
Additional comments:	

### Assurance Process Information

Date of Performance Determination (dd/mm/yyyy)	21 July 2022
Re-assessment Due Date (dd/mm/yyyy)	21 July 2025