



The Copper Mark Summary Report

Site Information

Name of the Site	Clydach Refinery
Unique identifier provided by the Copper Mark	S008
Address	Clydach Refinery, Glais Road, Clydach, Swansea SA6 5QR
Country of Operation	United Kingdom
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Nickel pellets and powder
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Nickel
Metals included in scope (This must be all, or a sub-set of the metals produced on site)	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 type="checkbox"/>
Other (<i>please explain</i>)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>

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

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	Emily Brennan
Name of the Assessment Firm (if applicable)	Arche Advisors
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	3-4 August 2022
Assessment Period	31/07/2021 – 01/08/2022
Summary of the Assessment Methodology	The assessment was conducted in accordance with ISO19001:2011 Standard. Auditor sampled 10% of primary material transactions. Sampling was not applied for supplier files review and supply chain review - meaning all supplier files and supply chains were assessed. All incoming minerals were sourced during the assessment period from Vale Group of Companies, which were not located in CAHRAs. 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 Clydach Nickel Processing Plant was conducted on August 3-4, 2022. Assessment activities started with Opening Meeting on August 3, 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

	<p>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 the final report will be issued later. After the assessment additional clarifications were requested by assessor and these were provided by auditee.</p>
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Summary of Findings

Criteria	Rating <i>Fully meets, partially meets, does not meet, not applicable</i>	Comments
1. Management System	Partially meets	<p>During the assessment period, Clydach refinery had s a simple supply chain with mined material inputs sourced from sister companies within Vale. There are no external suppliers.</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 here.</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>Clydach also has a process to receive and respond to grievances related to violations of the code of conduct. The Whistleblower Channel can be found here.</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"> • Policy

		<ul style="list-style-type: none"> ○ Clearly commit to carry out an independent third-party audit of the due diligence system ○ Identify applicable minerals <p>Training (minor improvement): carry out dedicated training specific to the OECD due diligence guidance and the Joint Due Diligence Standard</p>
2. Red Flag Identification Process	Partially meets	<p>Clydach has a process in place to identify red flags.</p> <p>Record review confirms Clydach 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>Because there are no external suppliers, the expectations for supplier due diligence are not applicable.</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>No red flags were identified during the assessment period.</p> <p>The following were identified as areas for improvement:</p> <ul style="list-style-type: none"> • The procedure to identify conflict-affected and high-risk areas, including the criteria, resources and thresholds applied must be documented • In conducting red flag assessments, transportation routes through conflict-affected and high-risk areas must be considered a red flag
3. Risk Assessment Process	Not applicable	No red flags were identified
4. Risk Management Process	Not applicable	No red flags were identified
5. Public Reporting	Fully meets	<p>Clydach has a “step 5” report that meets the requirements of the standard and is available here.</p> <p>There is an observation that:</p> <ul style="list-style-type: none"> • 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.
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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 18/07/2023.	<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 Commencement date + 12 months	<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)	25 August 2022
Re-assessment Due Date (dd/mm/yyyy)	24 August 2025