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The Copper Mark Summary Report

Participant Information

Name of the Site	Minera Los Pelambres
Unique identifier provided by the Copper Mark	P0030
Address	45 Km East of Salamanca, Coquimbo
Country of Operation	Chile
Copper products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper concentrate
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, molybdenum
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, molybdenum
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 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 checked="" type="checkbox"/>
Other (<i>please explain</i>)	

Equivalent Systems

<p>The following equivalent systems were applied:</p> <p><i>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 <u>Copper Mark Recognition Process</u>.</i></p>		
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	Rachelle Jackson / Juliana Villegas
Name of the Assessment Firm (if applicable)	Arche Advisors
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	26 September 2022 – 30 September 2022
Assessment Period	August 2021 – August 2022
Summary of the Assessment Methodology	<p>The assessment methodology included data gathering through site visits to the mine operation and community; observation, worker and management interviews, and document review of policies, procedures, and records related to each of the specific Copper Mark criteria. A sampling approach was used related to document selection and worker selection, including contractor agencies.</p> <p>Permanent workers: 1,100 Contract workers: 10,129</p>
Summary of the Assessment Activities	<p>Day 1:</p> <ul style="list-style-type: none"> Community interviews Visit to tailings dams <p>Day 2:</p> <ul style="list-style-type: none"> Opening meeting Facility walkthrough

	<ul style="list-style-type: none"> • Management interviews • Document review <p>Day 3:</p> <ul style="list-style-type: none"> • Management interviews • Assessment of conformance with criterion 31 • Document review <p>Day 4:</p> <ul style="list-style-type: none"> • Direct employee interviews • Union representative interviews • Contractor interviews <p>Day 5:</p> <ul style="list-style-type: none"> • Document review • Closing meeting and presentation of findings
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Summary of Findings

Criterion	Rating	Comments
<i>Fully meets, partially meets, does not meet, not applicable</i>	<i>Includes link to publicly available documents or supporting evidence where possible and at a minimum for those criteria with an *</i>	
1. Legal Compliance	Fully meets	<p>Legal compliance is overseen by the corporate legal executive over the Chacay region and the Antofagasta Minerals SA (AMSA) corporate manager of the environment. There is a corporate level legal department that monitors legislative developments related to mine operations on an on-going basis, supported by subject matter experts who oversee compliance in specific areas. There is regular communication between the corporate legal team and the site.</p> <p>The Los Pelambres site manager is responsible for ensuring the appropriate personnel at the site are involved in implementing any changes or systems required to meet new legal requirements.</p>

		<p>This was confirmed through interviews with management supported by review of documents such as register of legislation, activity reports, presentations of legal updates, and interviews with workers who confirmed knowledge of the internal laws and regulations and are trained on their applicability at site. During the site visit, it was observed that the company publishes policies, internal regulations, and regulations applicable to the activities being carried out.</p>
2. Business Integrity	Fully meets	<p>Los Pelambres follows corporate policies related to business integrity, including policies against bribery, corruption, and in promoting ethical business practices, including a prohibition on facilitation payments. Workers are trained on the policy and can locate it within the company website and posted in the workplace. There is a process to receive and review complaints related to business integrity, about which workers are also aware. Interviewees indicated that to date they had not filed any complaints.</p> <p>This was confirmed through interviews with management, review of documents including the policy, code of ethics, crime prevention manual, and interviews with workers.</p>
3. Stakeholder Engagement*	Fully meets	<p>Los Pelambres has a stakeholder map in line with public reporting obligations under Global Reporting Initiative (GRI) guidelines, done at the national, regional, and community level and including public and private individuals and organizations.</p> <p>In addition to the Somos Choapa program that operates in specific communities with initiatives around issues such as water, employment, and other ways the community wishes the company to contribute, Los Pelambres also has a formal grievance mechanism aligned with the UNGP Effectiveness Criteria. This is available here.</p> <p>This was confirmed through interviews with management, interviews with stakeholders who confirmed awareness of the grievance channels, and a review of documents including the stakeholder map, the stakeholder grievance channel webpage, report to management on system of complaints, and standard relationship process procedure, among others.</p>
4. Business Relationships	Fully meets	<p>Los Pelambres has policies and practices in place to manage standards and ethics in business relationships. Contractors are asked to sign commitments to uphold responsible business practices. The company carries a check on due</p>

		<p>diligence and conflicts of interest prior to entering into a business relationship with contractors. Supplier contracts include a requirement to adhere to the Code of Ethics, Anti-Slavery policy and Due Diligence Directive. Internal audits are carried out 1-2 x per year to check contracts and ensure the process is followed and requirements are met.</p> <p>This was confirmed through a review of documents including the directive of purchasing and supplier contracting, know your client procedures and forms, training records, and interviews with management.</p>
5. Child Labor	Fully meets	<p>Los Pelambres has Policies on human rights, no child labor, minimum age for hire, and recruitment and hiring procedures in place. No minors were observed during the field visit. Workers interviewed understood the child labor policy and knew where to find the written and electronic policy, where the prohibition of child labor is explicit. They also reported that they have been trained, demonstrated that they are not minors by providing proof of age documentation during hire, and indicated that they began to work at the sufficient age as stipulated by law. Job descriptions mention the requirement to meet minimum age requirements.</p> <p>Contractors commit to upholding the prohibition of child labor as part of the responsible business practices.</p> <p>This was confirmed through the facility walkthrough, interviews with management, interviews with workers, and a review of documents including the human rights policy, human resources handbook, recruitment handbook, and a review of the age-range of employees at Los Pelambres.</p>
6. Forced Labor	Fully meets	<p>Los Pelambres has policies on human rights, prohibition of forced labor, and recruitment and hiring procedures in place. The system is supported by tools to prevent practices that can contribute to conditions of forced labor, such as document retention, restricted movements, mandatory overtime, etc. No workers were observed to be working or residing on-site against their will. In interviews, employees demonstrated understanding of the organization's policy, where to find it, and how to raise a related complaint.</p> <p>Contractors commit to upholding the prohibition of forced labor as part of the responsible business practices. The company utilizes a third-party auditor to</p>

		<p>audit and certify the compliance of contractors on a monthly basis. Internal auditors also carry out spot audits at the site.</p> <p>This was confirmed through the facility walkthrough, interviews with workers, interviews with management, and a review of documents including the human rights policy, recruitment handbook, Know Your Client AMSA program, sample contracts, and internal audit reports.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>Los Pelambres has public reports containing policy statement on the respect of freedom of association and collective bargaining and has collective bargaining agreements in place between the company and unions. There are three unions at the site; one for mine employees, another for concentrator employees, and one for supervisors. 100% of the direct workforce is affiliated to the worker union and approximately 99% of supervisors are affiliated to the supervisor’s union. Employees are informed about the unions at the time of hire but are not compelled to join or not join. Collective agreements are negotiated every 3 years.</p> <p>At the time of the assessment, the supervisor’s union was in the process of negotiating their latest agreement. Interviews with the union representatives indicated there is engagement with the company and a good relationship overall.</p> <p>This was confirmed through interviews with management, interviews with workers, interviews with union representatives who reported good relationships with the company, and a review of documents including training content for managers and meeting minutes between the company and unions.</p>
<p>8. Discrimination</p>	<p>Fully meets</p>	<p>AMSA has policies and procedures in place for anti-discrimination and inclusion and promotion of equality. Workers are aware of the policies, have undergone training, and those interviewed stated they have neither been subjected to nor heard of colleagues who were the subject of discrimination. The company sets wages based on job requirements, tenure, competence, and not based on gender or other personal characteristics. The company allows employees to declare a beneficiary that is not a legal spouse, as a nondiscriminatory means for LGBTQ and others without a marital status.</p> <p>This was confirmed through interviews with management, interviews with workers, community members, and a review of documents including the directive on diversity and inclusion, new hire training</p>

		content, human rights policy, and human resources procedure.
9. Gender Equality	Fully meets	<p>Los Pelambres has policies and procedures to implement diversity inclusion, inclusive of gender equality. The company has an independent assessment on the state of the company on gender equality and inclusion, various internal presentations to sensitize and educate managers and executives, and an internal report outlining the company goals regarding increasing diversity and inclusion, with increasing recruitment of women as one of three main goals.</p> <p>Los Pelambres has reviewed all work areas from the mine to ensure adequate spaces as required by law, including increasing changing room spaces, and providing lactation areas in areas where women are working. There are improvements underway to ensure enough space to accommodate the goal of increased women in the workforce.</p> <p>There is a focus on job training for women, including an apprentice training program with people in the local communities that is currently 90% women. Los Pelambres is also changing job descriptions as needed to accommodate lesser</p> <p>years of work experience or allow for more pre-job training to ensure women have the opportunity to obtain the skills to qualify for the work.</p> <p>Workers are aware of the policies. The women interviewed indicated that they are treated in the same way, and that they have the same opportunities to advance in their positions.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the directive on diversity and inclusion, guide on diversity and inclusion, labor protocol for persons in gender transition, and an Internal Report on Diversity and Inclusion Roadmap and Advancing Goals, including data on male/female employment and goals for increasing female employment.</p>
10. Working Hours	Fully meets	<p>Los Pelambres has policies in place to ensure working hours are kept in line with the legal limit, workers receive days off, vacation, and there is no overtime.</p> <p>The site operates shifts of 7 days on, 7 days off, or 4 days on, 3 days off, depending on the role. Additional</p>

		<p>work hours should be approved by the union, according to the collective agreements.</p> <p>Workers are aware of the policies and how to report in case they are breached.</p> <p>This is confirmed through interviews with management, interviews with workers, and a review of documents including the Regional Labor Directorate Approval to Implement work shifts, a sampling of timecards, and collective bargaining agreements.</p>
11. Remuneration	Fully meets	<p>Los Pelambres has policies and practices in place to ensure remuneration is in line with legal requirements, including a commitment to "ethical wage payment" requirements for contract employees, which would be 38% higher than the minimum wage. The company uses an industry salary guide published by a third party to set wages for non-union employees. For union employees, wages are negotiated through the collective contract. No employee earns less than the minimum wage.</p> <p>This was confirmed through interviews with management, interviews with workers who confirmed their understanding of how the salary system works, and a review of documents including a sampling of wage records, audits of contractor wage payments, and collective bargaining agreements.</p>
12. Occupational Health and Safety	Partially meets	<p>Los Pelambres has a management system that is aligned with internationally accepted best practice frameworks, such as ISO 45001. Site observations confirm the use of PPE, adequate risk signaling, publication of control measures in each area, equipment, and machinery safety checklists. Workers are trained so that they know the mine's safety rules, policies, and regulations. They are also trained in emergency care; they can remove themselves from danger without having to request authorization, and their bosses hold safety talks and sign a document that indicates the risks of the task to be carried out and the control measures that are taken to avoid accidents. Interviewed workers know the procedure for reporting an accident or incident.</p> <p>Two gaps were identified:</p> <ul style="list-style-type: none"> • In one section, the changing area does not have a light and a door and the bathroom has deteriorated infrastructure. It is noted that there is a current contract underway to make

		<p>improvements to the bathrooms, dressing rooms, and infrastructure in this area.</p> <ul style="list-style-type: none"> The affiliated community is not fully trained on the emergency plan for the Mauro tailings dam. It is noted that the document is under development in conjunction with the respective government entities and the process is being carried out to allow for the disclosure of the emergency plan. There is evidence that there are risk controls in place. The firefighters / local government will be responsible for training of the community. <p>This was confirmed through site observations, interviews with management, interviews with workers, interviews with the community, and significant document review of the policies, procedures, meeting minutes, accident investigation records, drill records, among others.</p>
<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>Los Pelambres has an employee grievance mechanism in place hosted through an online portal that allows for tracking of complaints received, which must be investigated and responded to within set time frames, depending on the type of issue presented. Complainants must be informed of the result of the investigation on the grievance. The online portal allows for anonymous complaints to be made and the anonymous individual to receive an update on the resolution even though they reported in an anonymous way. This system is available for employees, contractors, and communities.</p> <p>Workers are aware of the grievance mechanism and its procedure. Union representatives stated that in case one of its members is being investigated, they are informed at the time of initiating of the investigation, and also have access to the resolution that the company does.</p> <p>This was confirmed through interviews with management, interviews with workers, interviews with union representatives and a review of documents including the platform, the e-learning module disseminating information about the platform, records of grievances received, and the new hire orientation content.</p>
<p>14. Environmental Risk Management</p>	<p>Fully meets</p>	<p>Los Pelambres has a system to manage environmental risks including policies, procedures, and performance measures. This system is functionally equivalent to ISO 14001.</p>

		<p>Workers have knowledge of the policy, procedures and know how to evaluate from their operational activity how they can impact the environment and what are the control measures to avoid or mitigate those impacts.</p> <p>In the areas where the highest percentage of particulate material is produced, there are different control measures that help to reduce this impact.</p> <p>This was confirmed through interviews with management, interviews with workers, a facility walkthrough, and review of documents including the environmental baseline, matrix of environmental impact aspects, training records, and internal audits.</p>
<p>15. Greenhouse Gas (GHG) Emissions*</p>	<p>Fully meets</p>	<p>Los Pelambres is part of a company-wide climate change strategy including the reduction of greenhouse gas emissions for scope 1 and scope 2.</p> <p>The company proposed a GHG reduction goal between 2018 and 2022 of saving 300,000 tons of CO₂, a goal that was reached in the first quarter of 2021. This allowed establishing a new goal in May 2021 of saving 730,000 tons of CO₂ between 2021 and 2025.</p> <p>The company establishes annual goals per site, which are the KPIs. The goal for 2021 is 3.5% savings in the emission budget. These targets are set at the corporate level. Reporting is made in line with international reporting protocols and was independently verified.</p> <p>Since March 2022 the mine works with 100% renewable energy, solar panels, and wind power.</p> <p>This is confirmed through interviews with management and a review of documents including the environment policy, the climate strategy, the climate change report, objectives, and goals set, risk assessment, and annual total emission sustainability report.</p> <p>More information is available here and here.</p>
<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>Los Pelambres has policies and procedures for energy consumption, including energy consumption indicators and energy efficiency goals and inspection reports. Workers understand the energy use policy and know how to reduce energy use.</p> <p>This was confirmed by a facility walkthrough, interviews with management, interviews with workers, and a review of documents including the above</p>

		reports, the energy management system manual, and internal audits.
17. Freshwater Management and Conservation	Fully meets	<p>Los Pelambres has a management system and follows legal processes for the use of water. Currently, Los Pelambres recycles 85% of water used in its processes. Los Pelambres began the construction of the INCO project, meant to take seawater through a pipe that goes from the port to the plant to reduce the use of continental water.</p> <p>Workers are aware of the policies and procedures.</p> <p>This was confirmed through interviews with management, interviews with workers, facility walkthrough, and review of documents including the implementation of measures to ensure responsible water consumption, water balance, controls of extraction, procedure, and guidelines for water reportability, baseline considerations for freshwater management, and internal audits.</p>
18. Waste Management	Fully meets	<p>Los Pelambres has a policy that describes the systems and legal processes established to manage the generation, storage, transportation, and disposal of waste, that effectively follows the waste hierarchy. The plan includes goals such as reducing waste generation. The waste management plan is approved by the local government and the site has sectoral permits to manage and dispose of all types of waste.</p> <p>Interviews with workers verified that they know the company's waste policy, they indicated that they have been trained to contribute to recycling, and that the company currently has clean points in all work areas.</p> <p>A visit to the hazardous substances deposit, hazardous waste deposit, verified that the company complies with the required legal guidelines. A visit to the facilities and work areas verified that the company has clean points implemented.</p> <p>This was further confirmed through a review of documents including the waste policy, waste management matrix, risk sheet for spillage of dangerous substances, chemical exposure control report, and inspection report of the regional ministerial secretary of health of the region of Coquimbo.</p>
19. Tailings Management	Partially meets	<p>Note: On 1st October 2021, the Copper Mark adopted the <u>Interim Guidance on Tailings Management</u>. All participants who joined the Copper Mark after this date are required to implement the Global Industry Standard for Tailings Management (GISTM) for</p>

		<p>existing and new tailings facilities at their site to achieve a “fully meets” rating for this criterion. Sites that have started implementation of the GISTM but where implementation is not complete at the time of the Copper Mark assessment are rated “partially meets”.</p> <p>Los Pelambres has a system in place to manage tailings. They have a policy, procedures and risk assessment for tailings operations in line with international best practices, including identifying and implementing critical controls, actions to avoid major risks, training, and a focus on reducing environmental risks and avoiding accidents.</p> <p>Los Pelambres began work on the implementation of the GISTM in 2022. A third-party was contracted to verify compliance and identify gaps. Currently, there is a work schedule for implementation and the company’s internal commitment is to have the standard fully implemented by August 2023.</p> <p>This was confirmed through review of documents including permits, internal audits, verification of compliance, interviews with managers, interviews with workers, and visits to the El Mauro and Quillayes tailings areas.</p>
20. Pollution	Fully meets	<p>Los Pelambres has policies and practices in place to manage pollution, and specifically avoid contamination and comply with current legal processes using the mitigation hierarchy. This includes objectives that are reviewed every year to reduce the use of hazardous substances, minimize the associated risks, and replace them with nonhazardous alternatives when necessary and possible; contingency and emergency plan to deal with incidents and accidents; annual training to workers and the community.</p> <p>Some specific initiatives include a preventive plan for hydration of roads and areas where particulate matter is generated, and real-time air quality monitoring that helps prevent exceeding the permissible limits.</p> <p>This was confirmed through interviews with management, facility walkthrough, and a review of documents including Consideration of mitigation, prevention and compensation measures, Environmental compliance resolution, Consolidated Report of the Evaluation Environmental Impact Study, and a number of specific issue-area reports.</p>

<p>21. Biodiversity and Protected Areas</p>	<p>Fully meets</p>	<p>Los Pelambres has a policy to protect biodiversity, implements the mitigation hierarchy and incorporates biodiversity management into impact assessment, planning and the operations. They are aware of the species that can be found in the area and have a complaint mechanism open to all parties. Workers are aware of the biodiversity policies and procedures. Four (4) protected areas were identified.</p> <p>This was confirmed through interviews with management, interviews with workers, facility walkthrough, and review of documents including proof of submission of records regarding the conditions, commitments and measures established in the environmental qualification resolution, baseline study, Wildlife rescue and relocation report, identification of protected areas, and Environmental inspection report by the environmental superintendence of the Chilean government.</p>
<p>22. Mine Closure and Reclamation</p>	<p>Fully meets</p>	<p>Los Pelambres has a mine closure plan, describing the economic and environmental parameters that cover the life cycle of the mine and its post closure phase. The closure plan was developed with stakeholder participation. It is worth noting that due to legal requirements the published version of the plan does not include social aspects of the closure, however the internal version of the closure plan does.</p> <p>This was confirmed through interviews with management, a review of the closure plan, and review of documents including closure plan approval permits, citizen participation attendance records, and Mining Site Risk Assessment Gap Report.</p>
<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>Los Pelambres has a policy and process to identify and evaluate health risks and determine significant health and safety risks in the community. Los Pelambres has measures in place to mitigate possible impacts. The health and safety policy and how to file claims are shared through development dialogues and workshops with the community and stakeholders.</p> <p>Of note, there are some indigenous groups within the communities that have not been directly engaged (see criterion 28). These indigenous groups exist within, and not apart from, the larger community.</p> <p>This was confirmed through interviews with managements, interviews, and meetings with representatives from three nearby communities, and a review of documents including impact evaluation on the human environment, dialogues for development</p>

		report, community health checks, and agreements with the community.
24. Community Development	Fully meets	<p>Los Pelambres identifies and consults with affected communities to implement development initiatives. This includes a diagnosis of the needs of the community a development plan, and a process to monitor and evaluate the impacts of the executed projects.</p> <p>Of note, there are some indigenous groups within the communities that have not been directly engaged (see criterion 28). These indigenous groups exist within, and not apart from, the larger community.</p> <p>This was confirmed through interviews with management, interviews with representatives from the community, and a review of documents including stakeholder mapping of local communities that are in the project's area of influence, plans for a community-focused engagement, and minutes of project meetings and progress reports on project implementation.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>Interviews were carried out with managers regarding the artisanal and small-scale (ASM) mining practices in the region of the mine site. Interviews were also carried out with community members in the area near the mine perimeter. Interview confirmed that there is no ASM activity within the sit's sphere of influence.</p> <p>The mine perimeter was also visited to physically confirm the absence of ASM activity.</p>
26. Human Rights	Fully meets	<p>Los Pelambres has a process in place to carry out human rights due diligence in line with the UN Guiding Principles for Business and Human Rights. This entails a policy, a human rights impact assessment, action plans to address issues identified, input from stakeholders, and a grievance mechanism. Workers and communities are aware of the human rights policy and grievance mechanism, and none interviewed reported being subject to or knowing anyone subject to a human rights violation by the company.</p> <p>This was confirmed through interviews with workers, interviews with stakeholders, interviews with management, and a review of documents including the human rights policy, the humanhttps://www.antofagasta.co.uk/investors/annual-report-2021/ rights impact assessment and action plan, and directive on due diligence.</p>
27. Security and Human Rights	Fully meets	Los Pelambres has a policy and procedure to support security and human rights. At the corporate level,

		<p>AMSA hired a Chilean non-profit corporate responsibility organization to provide expert content and a qualified trainer for training security staff on human rights and the Voluntary Principles on Security and Human Rights, including an evaluation administered after the training.</p> <p>This was confirmed through interviews with management, interviews with personnel in charge of security, employees, and community members, and a review of documents including the Security Training Manual of Independent Institute of Professional Training, training plan for security staff on human rights, credentials of trainer, and human rights policy.</p>
28. Indigenous Peoples' Rights	Partially meets	<p>Los Pelambres has a process to engage with various indigenous communities. They have identified 11 communities and continue to work on a strategy and action plan for their relationships, noting that not all communities choose to engage with the company.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> The strategy and action plan have not been fully implemented. While some meetings have occurred, the full strategy and roll out are still underway. <p>It is noted that Chile remains in process of officially identifying indigenous peoples with the most recent acknowledgement of the Chango people in 2020. In the last two years, 10 additional groups in the areas of Los Pelambres were officially recognized or came together as an organized community.</p> <p>This is confirmed through interviews with management and a review of documents including Social Management Model: Standard Process for Engagement with Indigenous Community, Characterizations of Indigenous Communities Minera Los Pelambres 2021, strategy documents for each community, policies, communication records, and meeting minutes.</p>
29. Land Acquisition and Resettlement	Not applicable	<p>An interview with management, environmental impact assessment and regional area maps confirm that no projects have required or are projected to require land acquisition or resettlement.</p>
30. Cultural Heritage	Fully meets	<p>Los Pelambres has a cultural heritage policy and processes of evaluation, development and implementation of mitigation measures related to asset management. Stakeholders are aware of the policy</p>

		<p>and grievance mechanism and are integrated into the processes related to cultural heritage.</p> <p>The company has retained full-time archaeologists on staff who are included in all construction and exploration work. There are policies for how to handle “items of interest” when detected. A baseline mapping of known sites complemented by annual reports of the Mauro valley allow the site to monitor and report to the government as required.</p> <p>This is confirmed through interviews with management, interviews with stakeholders, and a review of documents including baseline archeology mapping, permission to carry out archaeological, anthropological, and paleontological excavations, annual monitoring reports, and Operational procedure - Protection of flora, fauna, and historical heritage.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	Los Pelambres has a simple supply chain, only using its own mined material for input. The system is primarily managed at corporate level.
31.a. Management System	Fully meets	At the corporate level, AMSA has included in the AMSA corporate Sustainability Policy specific reference to the corporate commitment to the OECD Due Diligence guidelines and Annex II. Policies and procedures regarding due diligence have been put in place, including the inclusion of related clauses of contracts and agreements with service providers to require compliance (there are no material suppliers.) There is also a grievance channel managed by the corporate ethics committee to receive third party complaints.
31.b. Red Flag Identification Process	Fully meets	There is a process to confirm red flags including to identify CAHRAs. Chile was considered not to be a CAHRA.
31.c. Risk Assessment Process	NA	No red flags were identified.
31.d. Risk Management Process	NA	No red flags were identified.
31.e. Public Reporting*	Fully meets	All critical Step 5 elements are included in the reporting. There was an observation that the next sustainability report could include an index for mapping content to the Step 5 reporting to simplify the process of identifying relevant aspects of the report.

		The report is available here.
32. Transparency and Disclosure*	Fully meets	At corporate level, AMSA engages in regular public reporting, both through an annual report and a sustainability report framed to Global Reporting Initiative requirements. ICMM includes written commitments to EITI on behalf of its members on their website. More information is available here and here .

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"/>
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.	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Limitations:	
Additional comments:	

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

Date the Copper Mark is awarded (dd/mm/yyyy)	30 November 2022
Expiry Date of the Copper Mark (dd/mm/yyyy)	29 November 2025