



The Copper Mark Summary Report

Site Information

Name of the Site	Boliden Harjavalta Oy
Unique identifier provided by the Copper Mark	S001
Address	Teollisuuskatu 1, FI-29200, Harjavalta
Country of Operation	Finland
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathodes, nickel matte, gold bars and granules, silver granules, palladium concentrate
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, nickel, gold, silver, PGM
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.)	LBMA Responsible Gold and Responsible Silver
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" 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 checked="" type="checkbox"/>
Rails	<input checked="" type="checkbox"/>

Ports	<input checked="" 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	<p>The Independent Reviewer confirmed the assurance / certification was:</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	Josue Ruiz
Name of the Assessment Firm (if applicable)	RCS Global Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	<p>Head office: 8 February 2022</p> <p>Site: 20 January 2022</p> <p>Follow up assessment: 8 December 2022</p>

Assessment Period	1 January 2021 – 31 December 2021
Summary of the Assessment Methodology	<p>An assessment was completed at the head office where sourcing and sales is conducted. The sites are not able to purchase material themselves. Rather, this is handled at the corporate level. Each of the sites are subject to the policies, procedures, and activities of central control. In addition to the assessment at the head office, a site assessment was completed at each of the smelters.</p> <p>At the head office, the following activities were conducted:</p> <ul style="list-style-type: none"> • Opening Meeting • Company introduction and determination of scope, including: <ul style="list-style-type: none"> • All relevant facilities of the company are included in the audit scope; • Site operation and production flow • All relevant materials and suppliers are included in the audit scope. • Understanding of Boliden’s due diligence management systems: <ul style="list-style-type: none"> • Management interview to understand overall due diligence system • Internal management structure to support material control • Due diligence process and implementation: including risk assessment process, assessment tools and records • Internal employee training and communication • Supplier management process • Understanding of Boliden’s due diligence management systems: <ul style="list-style-type: none"> • Transparency and traceability over the lead, zinc, silver supply chains, internal recording system, material control and/or MIS platform • Transactions traceability review, and due diligence files review: <ul style="list-style-type: none"> • Review of selected transactions • Review of KYC files and counterparty’s AML policies • Closing Meeting <p>Triangulation of information based on document review, record review, interviews with management and workers, and facility walk-through.</p>
Summary of the Assessment Activities	<p>The following activities were conducted at site level:</p> <ul style="list-style-type: none"> • Opening meeting • Site introduction and determination of scope

	<ul style="list-style-type: none"> • Onsite facility tour <ul style="list-style-type: none"> ○ Inventory ○ Warehouse ○ Final products shipment products • Employee interviews on awareness • Transaction sampling and material control to match documents from headquarters to materials at site • Confirmation of implementation of policies / procedures • Closing meeting
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Summary of Findings

Criteria	Rating <i>Fully meets, partially meets, does not meet, not applicable</i>	Comments
1. Management System	Fully meets	<p>As of the follow up assessment on 8 December 2022, this criterion is fully meets.</p> <p>Harjavalta has a supply chain of medium complexity. The site receives primarily mined material and a small amount of recycled material.</p> <p>Boliden has established a due diligence process aligned with the OECD Due Diligence Guidance at corporate level. There is an OECD-aligned policy available here. The policy is appropriate to the nature, scale, and operational context of the company. It is understood by managers and relevant personnel in the company.</p> <p>Boliden has assigned responsibility for the implementation and maintenance of the management system and the achievement of its intended results. Senior management both ensures that the management system requirements are integrated into the company's business processes and ensures continual improvement.</p> <p>Resources are allocated and training is effective to implement the due diligence management system.</p>

		<p>There is an effective grievance mechanism in place that meets the requirements of the standard.</p> <p>Boliden has a process in place to conduct know-your-counterparty on suppliers.</p> <p>Supplier engagement activities are undertaken by Boliden Corporate are appropriate to collect information necessary for the implementation of the due diligence process.</p> <p>The following were identified as areas for improvement:</p> <ul style="list-style-type: none"> • Consistently implement the procedure to conduct know-your-counterparty on suppliers, retain the related records, and tighten the processes to avoid human error • Formalise the communication plan of the responsible sourcing management system to suppliers regarding how adherence will be monitored and assessed • Implementation of an OECD-aligned ESG clause into commercial agreements has not yet been assessed <p>The follow up assessment of 8 December 2022 confirms the gaps have been addressed.</p> <p>Improvements include the development of a “supplier connect portal” that reduces potential errors in operational systems for suppliers of secondary material, an update to the system for suppliers of primary material, the establishment of a system to evaluate the effectiveness of communication, internal training, and updates to contracts that did not previously have an ESG clause.</p>
<p>2. Red Flag Identification Process</p>	<p>Fully meets</p>	<p>As of the follow up assessment on 8 December 2022, this criterion is fully meets.</p> <p>The information collected to identify red flags is credible, reasonable, and appropriate to the nature, scale, and operational context of Boliden. Overall, the process is adequate to identify red flags.</p>

		<p>Boliden has a process to identify conflict-affected and high-risk areas that is reasonable and consistently applied.</p> <p>The process to identify red flags is implemented consistently. Boliden has identified red flags related to origin and transport of materials.</p> <p>The following were identified as areas for improvement:</p> <ul style="list-style-type: none"> • Ensure all KYC-related records are consistently maintained for suppliers • Ensure all suppliers are available on the electronic system in a consistent manner <p>The follow up assessment of 8 December 2022 confirms the gaps have been addressed.</p> <p>The process flow has been updated to include the initial risk determination to ensure consistent maintenance of records.</p> <p>Sample records demonstrated consistent maintenance of supplier files.</p>
<p>3. Risk Assessment Process</p>	<p>Fully meets</p>	<p>As of the follow up assessment on 8 December 2022, this criterion is fully meets.</p> <p>Boliden collects credible information and makes reasonable efforts to identify Annex II risks. The risk assessment results are reasonable, on the basis of the information collected, and based on the nature, scale, and circumstances of Boliden.</p> <p>Boliden conducts on-the-ground assessments taking into account location, company size, and circumstances, and the results are reasonable. No Annex II risks were confirmed during the assessment period.</p> <p>It is noted that in the assessment period some on-the-ground assessments could not take place due to Covid-19 but are scheduled to take place when travel permits.</p> <p>The following were identified as areas for improvement:</p> <ul style="list-style-type: none"> • Analyze the assessor’s independence before the assessment • Analyze the assessor’s competency before the assessment

		<ul style="list-style-type: none"> Maintain documents related to risk assessments, including risk analysis reports for high-risk suppliers <p>The follow up assessment of 8 December 2022 confirms the gaps have been addressed.</p> <p>The process flow has been updated to include the initial risk determination to ensure consistent maintenance of records.</p> <p>A sample of suppliers demonstrated consistent maintenance of supplier records, including high-risk suppliers and information related to the risk assessments and analysis.</p> <p>Additionally, the ESG on-site assessment procedure was updated to ensure the competence and independence of the assessor.</p>
4. Risk Management Process	Fully meets	<p>Boliden has a Risk Management plan for high and critical business partners. The risk mitigation strategy is consistent with the company's policy on responsible minerals supply chains and the recommendations of the OECD Guidance and is appropriate to the type and scale of the risks of adverse impacts and actual adverse impacts and the company's position along the supply chain.</p> <p>The risk management plan is supported by sufficient resources and implemented consistently. It is supported by stakeholder engagement activities appropriate to the type and scale of risks identified. The process to evaluate progress is appropriate and effective.</p> <p>It is noted that no Annex II risks were confirmed during the assessment period.</p>
5. Public Reporting	Fully meets	<p>Annual due diligence reports are publicly available here and covers the requirements of the standard.</p>

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 checked="" 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 January 2023.	<input 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 18 January 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)	20 April 2022
Re-assessment Due Date (dd/mm/yyyy)	19 April 2025