



The Copper Mark Summary Report

Site Information

Name of the Site	Glencore Canada Corporation - CCR Refinery
Unique identifier provided by the Copper Mark	S010
Address	220 Durochere Avenue, Montreal East, Quebec, Canada, H1B 5H6
Country of Operation	Canada
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, gold, silver, selenium, platinum / palladium, tellurium
Metals included in scope. (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.)	Gold, silver: covered by the LBMA Responsible Gold / Silver Guidance (respectively)
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input 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 Inc.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Corporate visit: 23-24 March 2023 Site visit: 5-6 April 2023
Assessment Period	1 January – 31 December 2022
Summary of the Assessment Methodology	<p>The assessment was conducted in accordance with ISO19001:2011 Standard.</p> <p>The auditor sampled a percentage of material transactions. Sampling was also applied to supplier file review and supply chain reviewed. The auditor used the triangulation method, including site tour, interviews, and documentation review to verify conformance against the Standard.</p> <p>The CCR refinery is a Glencore asset.</p> <p>Materials processed by CCR are sourced by Glencore’s marketing offices in Europe (corporate office) and North America. CCR does not source any materials directly.</p> <p>Glencore has a Group wide Responsible Sourcing Policy, Standard and related procedure for metals and minerals, on which CCR has built its supply chain policy.</p>

	<p>Due diligence on suppliers of metals and minerals is largely done through the corporate office.</p> <p>An assessment was completed at Glencore’s corporate office and at the CCR refinery.</p>
<p>Summary of the Assessment Activities</p>	<p>The assessors reviewed corporate level policies and procedures during the corporate visit on 23-24 March 2023.</p> <p>The on-site assessment was conducted as scheduled. Assessment activities included an opening meeting with the presence of management representatives responsible for implementation of the Due Diligence Management System; assessment scope, methodology and activities were explained; access to requested information was granted by the representatives.</p> <p>The opening meeting was followed by a facility tour, review of policies and procedures, review of selected transactions, KYC information, and supplier engagement activities; as well as interviews with management and responsible due diligence implementation employees.</p> <p>The assessment concluded with a closing meeting.</p>

Summary of Findings

Criteria	Rating	Comments
<p>1. Management System</p>	<p>Fully meets</p>	<p>Glencore Canada Corporation – CCR Refinery (CCR) has a medium-complexity supply chain. It sources both primary and secondary material from smelters within and outside of the Glencore Group, in various geographic locations.</p> <p>Glencore Group, the parent company, has a standalone Responsible Sourcing Policy (Date: June 1, 2022), which is publicly available here.</p> <p>CCR has a global supply chain policy that builds on the Glencore Group responsible supply chain policy and LBMA requirements and meets the requirements of the Joint Due Diligence Standard. The policy is communicated internally and externally and is understood by relevant workers. Glencore supports the EITI since 2012 at local and group level , and discloses payments to government here.</p> <p>Senior management is confirmed to assume responsibility of the implementation and maintenance of the management system, as well as achievement of its intended results. The system is integrated into corporate practice and</p>

		<p>senior management is responsible for continuous improvement.</p> <p>CCR provides adequate resources to support the implementation of the policy and management system are appropriate and proportional to its size, location, and circumstances.</p> <p>As part of the system, there is a grievance mechanism appropriate to the nature, scale, and operational context of the company.</p> <p>The information generated by the due diligence management system is sufficient for the effective implementation of all applicable steps of the due diligence process.</p> <p>CCR has a process to engage with suppliers, including to conduct risk assessments, monitor progress, increase transparency, and build capacity.</p> <p>This was confirmed through interviews with management, interviews with relevant workers, and a review of documents including the supply chain policy, public reporting, the Glencore Responsible Sourcing Standard, supplier files, and samples of transaction data.</p>
<p>2. Red Flag Identification Process</p>	<p>Fully meets</p>	<p>CCR and the corporate office have a process to collect, review, and retain both supplier and material information that is appropriate to the nature, scale, and operational context of the company, that is sufficiently and consistently implemented.</p> <p>The information collected is sufficient and credible to conduct a red flag assessment.</p> <p>CCR uses the Country Risk Assessment Tool 2022 Methodology Guidance, with sufficient, credible resources defined in the CAHRA identification process. They are clear criteria identified, and the process is reasonable and consistently applied.</p> <p>CCR has a process to collect, review, and retain information for red flags identification is appropriate to the nature, scale, and operational context of the company. The red flag assessment is reasonable and consistent with the process.</p>

		<p>One red flag was identified, which relates to materials, originating from a country, which is known for transit for minerals from CAHRAs. CCR has identified the need for further supplier engagement, the outcome of which will determine the need for an on the ground assessment to determine the presence of Annex II risks and the need for CAPs.</p> <p>This was confirmed through interviews with management and a review of documents including supplier questionnaires, the Glencore Country Risk Assessment Tool 2022 Methodology Guidance, communication records, a sample of supplier contracts, and the results of the red flag assessment.</p>
3. Risk Assessment Process	Fully meets	<p>CCR has a process to conduct a risk assessment using sufficient and credible information. The results of the risk assessment review process are reasonable, considering company size, location and circumstances and the information generated by the risk assessment.</p> <p>Note that more engagement is under way to determine whether there is a need to conduct a site-assessment. It is noted to follow up on this in the next assessment.</p>
4. Risk Management Process	Fully meets	<p>There is a process to conduct risk management, defined in the responsible sourcing policy. Since the presence of Annex II risks has not been confirmed for any suppliers, implementation of this process cannot be assessed. It is noted to follow up on this in the next assessment.</p> <p>No plan implemented yet as no confirmed Annex II risks identified.</p>
5. Public Reporting	Fully meets	<p>CCR has a Public Due Diligence Report for reporting period of 01 January – 31 December 2022. This is the 1st report that covers copper.</p> <p>The report covers the requirements of the standard and is accurate and consistent with the evidence and information reviewed on site. While the report does not cover changes in sourcing practices from one year to the next, it does provide information on development of the</p>

		<p>Due Diligence Management System and Continuous Improvement activities.</p> <p>Note this is the first report that covers copper.</p> <p>The report is available at Nos certifications et reconnaissances (glencore.ca) and CCR Public Due Diligence Report (glencore.net).</p>
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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 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 14 February 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 14 February 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)	7 June 2023
Re-assessment Due Date (dd/mm/yyyy)	6 June 2026