



Assessment Summary Report

Participant Information

Name of the Site	Boliden Harjavalta Oy
Unique identifier provided by the Copper Mark	P0061
Address	Teollisuuskatu 1, FI-29200, Harjavalta
Country of Operation	Finland
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathodes and nickel matte
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper, nickel, gold, silver, PGM
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper and nickel
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	LBMA Responsible Gold and Responsible silver. Report available here .
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"/>
Fabrication	<input type="checkbox"/>
Other (please explain)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input type="checkbox"/>

Rails	<input type="checkbox"/>
Ports	<input 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 Copper Mark Recognition Process.</i></p>		
Equivalent System	Review Process	Criteria Covered by Equivalency
<p>Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc</p> <p>20 April 2022</p>	<p>N/A – the assessment was conducted through the Copper Mark Assurance Process.</p>	<p>31. Due Diligence in Mineral Supply Chains</p>
<p>ISO 14001:2015</p> <p>Certification valid until 29 September 2023</p> <p>Confirmed that re-certification is in progress.</p>	<p>The assurance / certification was confirmed to be:</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 	<p>14. Environmental Risk Management</p> <p>16. Energy Consumption</p> <p>18. Waste Management</p> <p>20. Pollution</p>
<p>ISO 45001:2018</p> <p>Certification valid until 29 September 2023</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> Valid at the time of the review 	<p>12. Occupational Health and Safety</p>

<p>Confirmed that re-certification is in progress.</p>	<ul style="list-style-type: none"> • 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 	
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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)	20-21 March 2023
Assessment Period	March 2022 – March 2023
Summary of the Assessment Methodology	<p>Boliden Harjavalta is part of Boliden Group of companies running Copper smelter, nickel smelter and sulphuric acid plants in Harjavalta and copper electrolysis in Pori. Facility is located in south-west Finland.</p> <p>Main inputs are concentrates from external mines and Boliden Kevitsa mine.</p> <p>All Boliden Harjavalta units were included in the assessment scope.</p> <p>Permanent workers: 515</p> <p>Contract workers: 0</p>
Summary of the Assessment Activities	<p>Auditor conducted facility tours, management interviews, employee interviews, documentation review at both locations of company – in Harjavalta and Pori.</p> <p>Due to the nature of the stakeholders identified in the stakeholder mapping, external stakeholder interviews were not conducted. Stakeholders included government, society at large, customers and suppliers (both managed through corporate headquarters), and</p>

	others. Assessors were able to triangulate the evidence through detailed records in particular on government relations.
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Boliden Harjavalta has a system in place to ensure compliance with all national legal requirements, including national obligations under international law.</p> <p>There are people responsible for keeping up to date with local legislation, company-wide support to follow EU legislation and client requirements, external services for legal advice, and ongoing messages for changes in legal requirements.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the procedure to monitor legal obligations and assess compliance, internal audit reports, notifications and emails with changes, and the legal database.</p>
2. Business Integrity	Fully meets	<p>The company has implemented Boliden's policies and procedures in the area of business ethics, anti-Corruption, and payments. Workers are trained on these on hiring through refresher trainings. There is a whistleblower policy and procedure.</p> <p>Interviews with workers indicate there are no complaints related to business integrity to date.</p> <p>This was confirmed through management interviews; worker interviews; and a review of documents including anti-corruption guidelines, whistleblower policy, procurement policy, and training records.</p> <p>Relevant policies are available here.</p>
3. Stakeholder Engagement	Fully meets	Boliden Harjavalta has identified stakeholders relevant to its operation

		<p>and implements an engagement plan. External stakeholders are encouraged to contact the site directly through phone, email or use the whistleblower channel to communicate grievances.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including records of stakeholder communications, stakeholder map, communications plan, and grievance procedure.</p> <p>More information available here.</p>
4. Business Relationships	Fully meets	<p>Boliden Harjavalta communicates the supplier code of conduct through contracts as part of the terms and conditions. The site implements a supplier monitoring and evaluation program. Raw materials are sourced by Boliden Commercial in Stockholm. There is a process to escalate and engage with business partners identified as high risk.</p> <p>This was confirmed through interviews with management and a review of documents including supplier evaluation reports, the business partner code of conduct, procurement activities, and high-risk business partner instructions.</p> <p>Relevant policies are available here.</p>
5. Child Labor	Fully meets	<p>Boliden Harjavalta has implemented procedures to avoid child labor and conducts ongoing monitoring to ensure compliance. Boliden Harjavalta has assessed child labor as a low risk in their operations, which was considered reasonable by the assessor.</p> <p>No child labor or historic child labor was detected on site.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including employee files, employee</p>

		training records, hiring procedure, labor contracts, human rights commitment, and code of conduct.
6. Forced Labor	Fully meets	<p>Boliden Harjavalta has a policy and human resources procedures to prohibit forced and bonded labor. All workers are local, with no migrant workforce utilized. Overtime is strictly voluntary. There is a grievance mechanism in place which can be used to report instances of forced labor. No concerns were identified during the assessment.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including internal rules, training activities, code of conduct, personnel and competence development procedure, employee files, employee training records, and grievance reports.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>Boliden Harjavalta has an active trade union in place as well as a collective bargaining agreement. During the assessment, neither the union representative nor employees raised issues related to freedom of association and collective bargaining.</p> <p>This was confirmed through management interviews; worker interviews; union representative interview; and a review of documents including the collective bargaining agreement, meeting records with union / employee representatives and management, a sampling of pay slips, local agreements on salary raises, hiring procedures, and the code of conduct.</p>
8. Discrimination	Fully meets	<p>Boliden Harjavalta has adopted several policies, which address discrimination, equality, and diversity. There is a grievance mechanism in place to report any issues related to discrimination. During the assessment, no concerns were identified. While grievances related to discrimination were raised, they were reviewed and two of the four</p>

		<p>remediated through the grievance mechanism process.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the equality plan, grievance reports, the diversity policy, operation control, and principles of mental well-being.</p>
9. Gender Equality	Fully meets	<p>Boliden Harjavalta has policies in place to address discrimination, equality, and diversity. Gender equality is monitored at the group level. From 2020-2022, the employment of female workers in Boliden Finland operations rose from 17.1% to 17.8%.</p> <p>The grievance mechanism covers issues related to gender equality.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the equality plan, grievance reports, equality assessment and KPIs, and process for personnel and competence development.</p>
10. Working Hours	Fully meets	<p>Boliden Harjavalta has a process to register and monitor working hours. Normal weekly working hours are defined as 40 hours / week. The number of daily, weekly, or monthly overtime limits are not specified in legislation. A review of the working hours database and pay documents demonstrate conformance with local legislation, the collective bargaining agreement, and international law.</p> <p>All workers are entitled to 2 days off in every 7-day period in average. As weekly rest is not specified in legislation, it was noted, that some workers had worked up to 12 days in a row. However, these were in extraordinary circumstances and met the following conditions:</p>

		<ul style="list-style-type: none"> • Not in violation of local or national law. • The average number of rest days is equivalent to one in seven. • An assessment of health and safety impacts on the workers and related safeguards to protect those impacts are in place. <p>Overtime hours are strictly voluntary, and in accordance with both the CBA and local legislation.</p> <p>This was confirmed through management interviews; worker interviews; a review of the working hours database; and a review of documents including pay slips, code of conduct, grievance reports, training activities, and internal rules.</p>
11. Remuneration	Fully meets	<p>Remuneration is managed through collective bargaining agreements (CBA), and a local agreement that sets wages higher than required by the CBA. There is no legal minimum wage in Finland.</p> <p>For blue-collar workers, wages are paid twice a month. Evidence demonstrates wages are paid on time. Errors in the calculations are rare and fixed where appropriate.</p> <p>This was confirmed through management interviews; worker interviews; union representative interview; and a review of documents including pay slips, code of conduct, grievance reports, training activities, human rights commitment, and internal rules.</p>
12. Occupational Health and Safety	Fully meets	<p>The assessment confirmed Boliden Harjavalta has a valid ISO 45001 certificate.</p>
13. Grievance Mechanism	Fully meets	<p>Boliden Harjavalta has a grievance procedure for internal stakeholders that aligns with the effectiveness criteria of</p>

		<p>the UN Guiding Principles for Business and Human Rights.</p> <p>Grievances can be raised through a direct manager, the Union, whistleblower channel, or the myopinion, e-mail. In addition, there are appointed Safety delegates, who can receive confidential grievances. The process to handle grievances is clearly described and strictly forbids any retaliation. Workers are aware of the grievance channels.</p> <p>Grievances are managed on Group level with direct support from local assets. Four incidents of discrimination were reported through the formal grievance mechanism during 2022. All four were reviewed, and for two of the incidents, remediation plans were implemented, with results reviewed through a routine management review processes. In total two of the reported the incidents were resolved during the reporting period.</p> <p>This was confirmed through management interviews; worker interviews; union representative interview; and a review of documents including grievance records, whistleblower instructions, code of conduct, sustainability index, and training materials.</p>
<p>14. Environmental Risk Management</p>	<p>Fully meets</p>	<p>The assessment confirmed Boliden Harjavalta has a valid ISO 14001 certificate.</p>
<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>Boliden Harjavalta collects, analyzes, and publicly reports on CO2 equivalent emissions according to an internationally recognized protocol. Reduction targets have been established and progress is monitored over time. Results are available on annual sustainability reports and the sustainability index.</p> <p>GHG emission calculation is managed on group-level. Boliden Group has had a CO2 intensity target since 2014 and</p>

		<p>launched new CO2 absolute targets at the end of 2022 to raise their climate ambition throughout the value chain and align climate work with the Science Based Targets initiative (SBTi). Boliden Harjavalta has started reporting progress toward new 2030 targets in 2023 and continues to track and report CO2 intensity. The long-term goal is to achieve net zero Scope 1 and 2 greenhouse gas emissions by 2050.</p> <p>For Scopes 1 and 2 the target is 40% lower absolute emissions in 2030 with 2021 as base year.</p> <p>For Scope 3 the target is 30% lower absolute emissions in 2030 with 2021 as base year.</p> <p>This was confirmed through management interviews and a review of documents including the environmental policy, energy policy, climate commitment, annual sustainability report, sustainability index, audit report of CO2 emissions, and monthly CO2 emissions reports. More information is available here.</p>
16. Energy Consumption	Fully meets	<p>The assessment confirmed Harjavalta has a valid ISO 14001 certificate, and this criterion is covered in its scope.</p> <p>Boliden Harjavalta has also a valid ISO 50001:2018 certificate.</p>
17. Freshwater Management and Conservation	Fully meets	<p>Boliden Harjavalta has adopted a policy, which addresses freshwater management. Water-use impact assessment has been conducted in collaboration with relevant stakeholders and a water management system is implemented. There are preparedness and emergency plans in place. Workers are trained on environmental issues.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; and a review of documents including annual environmental reports, risk assessments, water management procedure, code of conduct,</p>

		preparedness plans, and environmental incidence reports.
18. Waste Management	Fully meets	The assessment confirmed Boliden Harjavalta has a valid ISO 14001 certificate, and this criterion is covered in its scope.
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	The assessment confirmed Boliden Harjavalta has a valid ISO 14001 certificate, and this criterion is covered in its scope.
21. Biodiversity and Protected Areas	Fully meets	<p>Boliden Harjavalta is located 1.5 kilometers from the Pirilänkoski Natura 2000 area, a grove-type conservation area along the river. The location is acknowledged in the environmental permitting of the site. An environmental impact assessment (EIA) was conducted for the projects of Sievari and Lammainen landfills in 2012. The EIA set the baseline against which ongoing risk assessments are periodically conducted.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the Boliden biodiversity commitment, environmental impact assessment, climate commitment, green investment criteria, audit summary, and landfill preparedness plan.</p>
22. Mine Closure and Reclamation	Not applicable	This criterion is not applicable to non-mining operations.
23. Community Health and Safety	Fully meets	Boliden Harjavalta has developed and implemented a management system to avoid, minimize, reduce, and compensate for adverse project-related impacts on community health and safety, in partnership with local stakeholders. The review focuses primarily on air emissions and water quality.

		<p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the environmental assessment, project development process, health and safety policy, environmental permits, monitoring program, grievance records, communication records, and operating principles to prevent accidents.</p> <p>Note that due to the nature of the external stakeholders and the relationship with the local government, there were no interviews.</p>
24. Community Development	Fully meets	<p>Boliden Harjavalta's community development plan includes input from the community and is implemented through sponsorships. The main focus groups are children and young people. The site supports different sports activities, local events, student organizations, and have built Boliden Arena (Sports Arena) for the local community.</p> <p>This was confirmed through management interviews; and a review of documents including the community needs assessment, list of provided sponsorships, sponsorship budget, investment proposal, stakeholder analysis, and green investment criteria.</p> <p>Note that due to the nature of the external stakeholders and the relationship with the local government, there were no interviews.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>The assessment confirmed there is no ASM in the sphere of influence.</p>
26. Human Rights	Fully meets	<p>Boliden Harjavalta has a policy commitment that refers to the UN Guiding Principles and which commits the company to protecting, respecting, and remedying human rights through a systemic approach. The policy statement is communicated to employees through website, trainings, and the annual sustainability report.</p>

		<p>The policy is supported by human rights due diligence and human rights impact assessments including a supply chain risk assessment. There is a grievance procedure in place, and records of lodged grievances demonstrate the effectiveness of the system.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the human rights assessment, sustainability index, annual due diligence report, and plethora of human rights policies and procedures.</p>
27. Security and Human Rights	Not applicable	This criterion is not applicable to non-mining operations.
28. Indigenous Peoples' Rights	Not applicable	The assessment confirmed there are no indigenous peoples' groups in the area, where auditee operated. However, groupwide policies and procedures are in place.
29. Land Acquisition and Resettlement	Fully meets	Boliden Harjavalta is located in an industrial area created for the purpose of the facility. No resettlement activities have been carried out. On occasion, the site engages with the local government on land changes to land ownership.
30. Cultural Heritage	Fully meets	<p>Boliden Harjavalta has a policy to protect cultural heritage. A materiality assessment demonstrates there is no adverse impacts on critical cultural heritage caused by the operation.</p> <p>This was confirmed through site tours in Harjavalta and Pori production units; management interviews; worker interviews; and a review of documents including the indigenous people commitment, sponsorship documents, sustainability topics and directions, materiality assessment with future focus, and group environmental targets, KPIs, and PIs.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	This criterion was assessed separately using the Copper Mark Assurance Process and the Joint Due Diligence

		<p>Standard for Copper, Lead, Nickel, and Zinc on 20 January 2022.</p> <p>The full report on this criterion and the results of the assessment is available here.</p>
32. Transparency and Disclosure	Fully meets	<p>Boliden Harjavalta reports as part of Boliden, the parent company's annual sustainability report. The report highlights the company's development and performance within areas such as productivity, investments, and sustainability. It is also part of Boliden's audited Sustainability Index, in accordance with the Global Reporting Initiative (GRI) Standards, which includes further information in relation to the UN Global Compact's ten principles as well as disclosure to the Task Force on Climate-related Financial Disclosures (TCFD). Since 2021, Boliden also reports in accordance with the Sustainability Accounting Standards Board (SASB) and the International Council on Mining and Metals (ICMM).</p> <p>More information is available here.</p>

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 checked="" 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 9 January 2025.	<input 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	<input type="checkbox"/>

of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 9 January 2025.	
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:	

Award

The Copper Mark	<input checked="" type="checkbox"/>
The Molybdenum Mark	<input type="checkbox"/>
The Nickel Mark	<input checked="" type="checkbox"/>
The Zinc Mark	<input type="checkbox"/>

This Summary Report is prepared using data from the independent accountant's assurance report and the independent assessor report. The Copper Mark confirms the assessors' opinion and awards the relevant metal Mark(s) as follows.

Date The Copper Mark and The Nickel Mark are awarded	6 June 2023
Expiry date of The Copper Mark and The Nickel Mark are awarded	5 June 2026