



## The Copper Mark Summary Report

### Participant Information

Name of the Site	Compañía Minera Condestable S.A (CMC)
Unique identifier provided by the Copper Mark	P0023
Address	Av. Manuel Olgúin Nº 501, Of 803, Santiago de Surco, Lima
Country of Operation	Peru
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, gold, silver
Metals included in scope of Criterion 31 (this must be all or a sub-set of the metals produced on site)	Copper, gold, silver
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 type="checkbox"/>
Other ( <i>please explain</i> )	

### Independent Review

<p>The Independent Review took place from 1 <b>April 2022 to 28 April 2022</b>. During this step, the Independent Reviewer examined the Copper Producer’s self-assessment, supporting documentation, independent third-party assurance reports, and publicly available information. The activities included review for completeness, verifying equivalence, and conducting desk-based due diligence.</p> <p>As a result, the Independent Reviewer recommended the scope of the site assessment to the Copper Mark.</p>		
<p>The Independent Reviewer confirmed completeness, indicating available evidence for the assessor to review for all applicable criteria:</p>		<p>All 32 criteria</p>
<p>The Independent Reviewer recommended the following criteria be included in the scope of the independent site assessment:</p>		<p>All except</p> <ul style="list-style-type: none"> <li>• 12. Occupational Health and Safety</li> <li>• 14. Environmental Risk Management</li> <li>• 18. Waste Management</li> <li>• 25. Artisanal and Small-Scale Mining</li> <li>• 28. Indigenous Peoples’ Rights</li> <li>• 29. Land Acquisition and Resettlement</li> </ul>
<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>		
<p><b>Equivalent System</b> <i>(Name, date of assurance / certification)</i></p>	<p><b>Review Process</b></p>	<p><b>Criteria Covered by Equivalency</b></p>
<p>ISO 14001:2015</p>	<p>The Independent Reviewer confirmed the assurance / certification was:</p>	<ul style="list-style-type: none"> <li>• 14. Environmental Risk Management</li> </ul>

19 February 2021 - 27 May 2021	<ul style="list-style-type: none"> <li>Valid at the time of the review</li> <li>No more than 24 months old and / or plans for reassessment are underway</li> <li>In effect for an additional 12 months and / or plans for reassessment are underway</li> <li>Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials</li> <li>Accompanied by improvement plans where applicable</li> </ul>	<ul style="list-style-type: none"> <li>18. Waste Management</li> </ul>
ISO 45001:2018 19 February 2021 - 27 May 2021	<p>The Independent Reviewer confirmed the assurance / certification was:</p> <ul style="list-style-type: none"> <li>Valid at the time of the review</li> <li>No more than 24 months old and / or plans for reassessment are underway</li> <li>In effect for an additional 12 months and / or plans for reassessment are underway</li> <li>Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials</li> <li>Accompanied by improvement plans where applicable</li> </ul>	12. Occupational Health and Safety
The Independent Reviewer recommended the following criteria be considered focus areas for the independent site assessment:		None
The Independent Reviewer recommended the following criteria be considered not applicable to the Site:		<ul style="list-style-type: none"> <li>25. Artisanal and Small-Scale Mining</li> <li>28. Indigenous Peoples' Rights</li> <li>29. Land Acquisition and Resettlement</li> </ul>

### Independent Site Assessment Information

Name of the Lead Assessor	Ricardo Labó Follow up assessment: Elanne Almeida
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Name of the Assessment Firm (if applicable)	LQG Energy and Mining Consulting (LQ A Consultoría y Proyectos Ambientales SAC) Follow up assessment: EY Chile
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Site assessment: 24-27 May 2022 Document review: 30 May – 15 June 2022 Follow up assessment: <ul style="list-style-type: none"> <li>• All activities: 31 – 2 June 2023</li> <li>• Site visit: 15 – 17 May 2023</li> </ul>
Assessment Period	24 May 2021 – 23 May 2022 Follow up assessment: <ul style="list-style-type: none"> <li>• All activities: 31 – 2 June 2023</li> <li>• Site visit: 15 – 17 May 2023</li> </ul>
Summary of the Assessment Methodology	<p>Application of ISO methodology to determine conformance with the Copper Mark criteria. Using document review, interviews, and site observations to support determinations. Included in the scope were visits to the campus, offices, auxiliary areas, medic, lab, lunchroom, mine, processing area, and tailings facilities.</p> <p>Follow up assessment methodology: the follow up assessment was focused on the 10 criteria considered “partially meets” from the initial assessment.</p>
Summary of the Assessment Activities	<p>Day 1</p> <ul style="list-style-type: none"> <li>• Opening meeting</li> <li>• Visit to office of public information of Minera Condestable in the town of Mala</li> <li>• Visit to main operations</li> <li>• Meetings with relevant personnel related to labor rights, community, energy consumption criteria</li> <li>• Daily closing meeting</li> </ul> <p>Day 2</p> <ul style="list-style-type: none"> <li>• Meetings with relevant personnel related to human rights, security, legal compliance, business integrity criteria</li> <li>• Visit to auxiliary services (dormitories, kitchen, medic, etc.)</li> <li>• Worker interviews (39 workers of employees and contractors)</li> <li>• Daily closing meeting</li> </ul> <p>Day 3</p> <ul style="list-style-type: none"> <li>• Meetings with relevant personnel related to due diligence, transparency, GHG emissions, other environmental criteria</li> </ul>

	<ul style="list-style-type: none"> <li>• Interviews with external stakeholders</li> <li>• Daily closing meeting</li> </ul> <p>Day 4</p> <ul style="list-style-type: none"> <li>• Meeting at central offices</li> <li>• Meetings with senior representatives of the company</li> <li>• Closing meeting and presentation of findings</li> </ul> <p>Follow up assessment activities:</p> <ul style="list-style-type: none"> <li>• Planning and scoping</li> <li>• Document review</li> <li>• Virtual meetings with management</li> <li>• Site visit, including:             <ul style="list-style-type: none"> <li>○ Meetings with relevant teams</li> <li>○ Facility walkthrough</li> <li>○ Worker interviews</li> <li>○ Stakeholder interviews</li> </ul> </li> <li>• Report-writing and finalization</li> </ul>
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### Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>CMC has systems in place to comply with legal requirements. It is supported by compliance matrices, internal, external and government audits, and a team to maintain, disseminate information to and communicate with other teams at the site.</p> <p>This was confirmed through document review and interviews.</p>
2. Business Integrity	Fully meets	<p>CMC has a system in place to promote business integrity. There is a policy that prohibits bribery, corruption, and anti-competitive behavior, and is explicit on prohibiting facilitation payments. It is complemented with training and a gift log.</p> <p>This was confirmed through interviews with workers and document review.</p> <p>The following observations were identified:</p>

		<ul style="list-style-type: none"> <li>• No gift registry was maintained during Covid as government offices were closed. The gift registry is still not maintained even though offices are open</li> <li>• Not all workers interviewed were familiar with elements of the policy related to situations to avoid and / or mechanisms established to manage situations covered by the Policy</li> </ul>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has a stakeholder map, a plan for engagement and grievance mechanism. There is evidence of some community engagement, but the plan has not been formally implemented.</p> <p>SPM has a grievance mechanism called <b><u>Speak Up – SPM Contigo</u></b>.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• The Community Engagement Strategic Plan has not been fully implemented</li> <li>• Community representatives expressed a desire for a roundtable or dialogue to jointly – with other representatives – discuss community needs and identify where the company can provide support</li> <li>• There is not a structured system to capture the interactions, decisions and agreements (and follow-up of them) between the company and stakeholders (including social support, development, local employment and procurement, etc.)</li> <li>• There are no defined regulations and rules for determining representation within stakeholder fora</li> <li>• Knowledge and understanding of <i>SPM Contigo</i> is not uniform internally or externally</li> </ul> <p>During the follow up assessment in May 2023, it was verified that the strategic plan is implemented through an annual community relationships plan and related activities. Notes, records, decisions, and follow up actions are regularly kept, and result in monthly reports.</p> <p>The social investment strategy is underway, The participatory monitoring committee has</p>

		<p>internal regulations, objectives, scopes, rights and principles clearly defined. A work plan was developed and is implemented.</p> <p>The follow up assessment verified that information about SPM Contigo has been disseminated internally and externally through numerous avenues, including information tents, posters, banners, bulletins, manuals, and through the local radio. Stakeholders are aware of the reporting channels, confidentiality, and types of complaints they can file.</p> <p>This was confirmed through interviews with management and local teams; interviews with workers; interviews with community members; facility walkthrough; and a review of documents including records, notes, matrices, revised stakeholder maps, and work plans for 2023.</p>
4. Business Relationships	Fully meets	<p>CMC has policies, programs, and processes to require business partners to act responsibly. There is a process to identify risks with suppliers, and a supplier code of conduct, contractual clauses binding suppliers to sustainable practices, and training and capacity building for suppliers.</p> <p>This is confirmed through document review and interviews.</p> <p>The following observations were identified:</p> <ul style="list-style-type: none"> <li>Suppliers are not fully aware about the specifics of responsible practices nor the SPM Contigo system</li> </ul>
5. Child Labor	Fully meets	<p>CMC has policies in place to prevent child labor, complemented by training and systems of control. There are also requirements to prevent child labor for suppliers and business partners.</p> <p>This was confirmed through document review, interviews with workers and management, and site observations. No child labor was identified during the field visit.</p> <p>The following observations were identified:</p> <ul style="list-style-type: none"> <li>Training for workers is still at early stages, and no refresher training has yet taken place</li> </ul>
6. Forced Labor	Fully meets	<p>CMC has policies in place to prevent forced labor, complemented by training and systems of</p>

		<p>control. There are also requirements to prevent forced labor for suppliers and business partners.</p> <p>This was confirmed through document review, interviews with workers and management, and site observations. No forced labor was observed during the field visit.</p> <p>The following observations were identified:</p> <ul style="list-style-type: none"> <li>• Training for workers is still at early stages and no refresher training has yet taken place</li> <li>• When a policy or procedure is updated, the linked policies and procedures are not consistently updated</li> </ul>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>CMC has a system in place to support freedom of association and collective bargaining, demonstrated through policies and procedures.</p> <p>This was confirmed through document review and interviews with management and workers. In interviews, union representatives described a positive relationship with the site and good responses to issues raised.</p>
<p>8. Discrimination</p>	<p>Fully meets</p>	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has policies in place to prevent discrimination, harassment, and sexual harassment. There is evidence of training and systems of control, including a committee designed to address in particular sexual harassment as required by law. There are also requirements to prevent discrimination for suppliers and business partners. It was observed that no discrimination seems to be taking place.</p> <p>This was confirmed through document review, interviews with workers and management, and site observations.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• Interviews with workers indicated training received was either not consistent or not well understood</li> <li>• The harassment committee does not keep a register or meeting notes, as required by law</li> <li>• There was no evidence that the site follows the law requiring companies with more than</li> </ul>



		<p>50 workers to fill 3% of the workforce with workers with disabilities</p> <ul style="list-style-type: none"> <li>There was no evidence that the site has analyzed which jobs can be filled by people with disabilities, or that there have been calls to fill such jobs without success</li> </ul> <p>During the follow up assessment in May 2023, it was verified that training was provided on and workers are aware of the policies to prevent discrimination, harassment, and sexual harassment. A committee to investigate claims on sexual harassment was launched, though has not received any complaints to date.</p> <p>CMC conducted a study to assess the plausibility of positions available to persons with disabilities, concluding that the analyzed positions posed a moderate to high-risk for persons with disabilities. The study, combined with evidence of existing workers with disabilities, exempts the company from certain legal compliance obligations related to the 3% requirement for workers with disabilities.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the act to form the sexual harassment committee, the study on jobs available for workers with disabilities, and training content and records.</p>
9. Gender Equality	Fully meets	<p>CMC has policies and procedures in place to ensure equality of conditions and pay equity in a transparent manner. This is complemented with objectives, indicators, budget, and goals, an operating manual, and clear responsible persons. It is noted that of 9 management positions in the company, 3 are occupied by women.</p> <p>This was confirmed through document review, and interviews with management and workers. During interviews, female workers stated that they noted no differences in treatment between women and men.</p>
10. Working Hours	Fully meets	<p>CMC has a system in place to keep working hours below 60 hours per week in line with national regulation. Normal working hours are capped at 48 hours per week, with voluntary overtime up to 56 hours total per week. This is enshrined in policies and procedures to maintain</p>

		<p>and control working hours. Workers are on a shift rotation of 1 of 3 types of shifts: 14 days on and 7 off; 5 days on and 2 days off; or 6 days on and one day off.</p> <p>This was confirmed through document review, record review, and interviews with management and workers.</p>
11. Remuneration	Fully meets	<p>CMC has a system in place for fair compensation for work regardless of gender and based on value. Remuneration is aligned with national industry average, above minimum wage, and determined through collective bargaining agreements.</p> <p>This was confirmed through review of documents, records, and training material, and interviews with management.</p>
12. Occupational Health and Safety	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through ISO 45001:2018.</p>
13. Grievance Mechanism	Fully meets	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC utilizes a grievance mechanism that exists at the corporate level. It is accompanied by a user manual. During worker interviews, it was stated that most grievances are raised through the union and its representatives.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• The information on how to access the grievance mechanism is not easily accessible (for example, through posters)</li> <li>• There is no evidence of training on the Code of Ethics, the grievance mechanism, the process, or how to access the relevant procedures</li> <li>• The “Ethics Speak Up” hotline has not been fully implemented</li> </ul> <p>The follow up assessment in May 2023 verified the implementation of a communication and training plan on the SPM Contigo system. Information was disseminated through multiple avenues, including whatsapp, QR codes, emails, bulletins, and an information fair for workers.</p>

		<p>There is a formal procedure to receive and manage complaints in the system, including monitoring indicators.</p> <p>Workers indicated they had received training and understand the process.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the communication and training plan, evidence of communication, evidence of training, the complaints procedure, and the manual for complaints.</p>
14. Environmental Risk Management	Fully meets	<p>The Independent Review confirmed that the site meets the requirement as validated through ISO 14001:2015.</p>
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has a policy and plan to reduce greenhouse gas emissions that is known by relevant personnel, including reduction targets for scopes 1 and 2. The site holds a certification of energy use of renewable hydro energy that is renewed annually. More information is available <a href="#">here</a>.</p> <p>This is confirmed through document review, interviews with management and workers, and site observations.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• The implementation of the Emissions Reduction Plan 2022 has not begun</li> <li>• Employees were not aware of the company's reduction targets for scopes 1 and 2</li> </ul> <p>During the follow up assessment in May 2023, it was verified that a carbon footprint measurement report was commissioned and completed. The report was used a basis for the revised GHG reduction plan. In parallel, efforts to increase the use of renewable sources, such as electric vehicle fleets, hydroelectric, and charging stations have already begun.</p> <p>Workers have been train and communications enhanced on the objectives of the GHG reduction plan and the actions to implement the plan.</p>

<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>CMC has a system for energy consumption embodied in the policy for climate change and energy efficiency. There are processes in place to measure energy use in every area of operation. The policy is known by relevant personnel, who understand the rationing use of electrical energy, and CMC is rolling out training on the same to all workers. The site holds a certification of energy use of renewable hydro energy that is renewed annually. There are visible changes in energy use, for example of LED lights in the operations.</p> <p>This is confirmed through document review, interviews with worker and management, and site observations.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>CMC has a system in place to manage and conserve freshwater, as well as ISO14001. They have a project to reduce their water footprint and promote shared value with the local communities. Workers and relevant personnel are aware of the policies and procedures.</p> <p>This was confirmed through review of documents, records, training, and interviews with workers and management.</p>
<p>18. Waste Management</p>	<p>Fully meets</p>	<p>The Independent Review confirmed that the site meets the requirement as validated through ISO 14001:2015.</p>
<p>19. Tailings Management</p>	<p>Partially meets</p>	<p>CMC has systems to manage tailings and are in the process to comply with ICMM. They have external reports on potential emergencies. Employees have some training on the management processes.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• The current recommendations identified in the last “Dam Break Analysis” report have not yet been implemented</li> <li>• The GISTM is not yet fully implemented</li> <li>• Workers do not have a deep understanding on tailings management</li> </ul> <p>During the follow up assessment of May 2023, it was verified that the process to implement GISTM is still underway and will be complete by 2025, in accordance with the GISTM timelines.</p>

		A formal request for an extension was provided to and approved by the Copper Mark.
20. Pollution	Fully meets	<p>CMC has a system in place to manage pollution that follows the mitigation hierarchy and is certified to ISO 14001. They identify, register, and minimize, mitigate, or eliminate negative impacts from pollution. The system includes input from local populations since 2019.</p> <p>This was confirmed through a review of documents, records, training, and through interviews with management and workers.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>CMC has a system in place to manage biodiversity and protected areas including a policy, processes, inspections, analysis of different seasons, and monitoring.</p> <p>This was confirmed through a review of documents, records, training, and through interviews with management and workers.</p>
22. Mine Closure and Reclamation	Fully meets	<p>CMC has a mine closure and reclamation plan that is reported on twice annually. It covers financial, environmental, and social elements. Stakeholders are aware of and able to comment on the closure plan.</p> <p>This was confirmed through document and record review and interviews with management and workers.</p> <p>The following observations were identified:</p> <ul style="list-style-type: none"> <li>Workers and stakeholders could benefit from reinforcement training and capacity building about the mine closure plan</li> </ul>
23. Community Health and Safety	Fully meets	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has a policy and programs in place to support the health and safety of the community. This includes monitoring the quality of the environment to preserve the health of the population. CMC also assists workers, who are members of the community, with matters of health when there are challenges with health insurance.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>The impact of the efforts to address community health and safety are not measured and recorded</li> </ul>

		<ul style="list-style-type: none"> <li>The grievance mechanisms or channels to discuss concerns of health and safety with the community are not well understood or easily accessible</li> </ul> <p>During the follow up assessment in May 2023 it was verified that CMC annually prepares Impact Reports on community health of the health programs it supports. Reports include impact indicators such as beneficiary groups and the number of direct and indirect beneficiaries.</p> <p>CMC maintains ongoing dialogue with the health authorities, police, and firemen.</p> <p>CMC has two protocols: an emergency preparedness and response plan; and one to control risks derived from the transport of people, goods, products or materials.</p> <p>The grievance mechanism is available to communities and they demonstrate awareness of it as a channel to raise health and safety concerns.</p> <p>This was confirmed through interviews with management; interviews with members of the community including district authorities such as the police; and through a review of documents including an inventory of community health and safety programs and their relevant records, the emergency preparedness and response plan, and records of training and communication.</p>
<p>24. Community Development</p>	<p>Fully meets</p>	<p>The follow up assessment in May 2023 confirms this criterion is fully met.</p> <p>CMC has a plan in place to manage community development with three pillars.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>The community development plan implementation, including the assignment of a budget, timelines, indicators, and details, publicly available regarding community development have not been finalized</li> <li>The stakeholder map is not regularly updated as per the stakeholder engagement plan</li> <li>The community development plan is not aligned with the commitments and recommendations included in their last Environmental Impact Assessment</li> </ul>

		<ul style="list-style-type: none"> <li>The communities are not well integrated into community development activities</li> </ul> <p>During the follow up assessment in May 2023, it was verified that CMC has both a three-year strategy and a 2023 workplan for stakeholder engagement, including an updated stakeholder map for 2023. Mapping is updated regularly, including every time there are changes or new social actors identified.</p> <p>The CMC sustainability project aims to maximize social investment, under a long-term approach. It was developed in consultation with stakeholders, who will also be involved in the implementation.</p> <p>Community development activities are monitored and managed through a matrix that includes information on budget, execution timelines, responsible persons, and activities. This is also reported out on a monthly basis and shared internally.</p> <p>Activities identified through the environmental impact study in June 2023 will be implemented. In response to a community request for more public procurement, CMC has made a commitment to prioritizing the hiring of local labor, through public and transparent procedures.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; and a review of documents including the stakeholder map, proposals for projects and programs, and the activities matrix.</p>
25. Artisanal and Small-Scale Mining	Not applicable	The site assessment confirmed there is no ASM in the area of influence.
26. Human Rights	Fully meets	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has policies in place to protect human rights in line with the UN Guiding Principles on Business and Human Rights.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>Workers are not well aware of the human rights policies and the associated grievance mechanism</li> </ul>



		<ul style="list-style-type: none"> <li>• The action plan and recommendations from the Human Rights due diligence assessment have not been implemented</li> <li>• There are no clear processes for access to information about complaints filed</li> </ul> <p>During the follow up assessment of May 2023, it was verified that CMC deployed a communications and training plan about the human rights policy, grievance mechanism, and relevant procedures to workers and external stakeholders. Interviews confirmed knowledge and understanding of these policies and procedures.</p> <p>CMC is implementing an action plan with short, medium, and long-term activities in relations to the results of the human rights due diligence assessment. Priority is given to the issues of highest risk.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with community members; and a review of documents including the training plan and content, the human rights policy, and the human rights due diligence assessment report.</p>
<p>27. Security and Human Rights</p>	<p>Fully meets</p>	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has policies and procedures in place to support security and human rights in line with the UN Voluntary Principles on Security and Human Rights (VPSHR)..</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• Security forces implementation of the VPSHR is not monitored and evaluated</li> <li>• Potential security and human rights risks are not identified and analyzed</li> <li>• The policies following the VPSHR do not clarify the use of firearms</li> <li>• Personnel is not well trained on issues related to security and human rights</li> </ul> <p>During the follow up assessment of May 2023, it was verified that the communication and training plan included security and human rights. Interviews with security confirmed they</p>



		<p>are aware of the policy and relevant procedures for security and human rights.</p> <p>CMC conducted a gap assessment on the VPSHR at the site and developed and implements action plans to close the gaps.</p> <p>The security company and CMC have signed a new contract, committing the contractor to the VPSHR. The procedure for firearms was reviewed and revised in accordance with the VSPHR. A supervisory procedure is in place to monitor and report on VSPHR daily.</p> <p>This was confirmed by interviews with management; interviews with security personnel; and a review of documents including the policies and procedures, supervisory plan, supervisory notes, training, and communication.</p>
28. Indigenous Peoples' Rights	Not applicable	The site assessment confirmed there are no indigenous peoples in the area of influence.
29. Land Acquisition and Resettlement	Not applicable	The site assessment confirmed there is no planned or recent land acquisition or resettlement.
30. Cultural Heritage	Fully meets	<p>CMC has a process in place to manage cultural heritage. This includes a baseline study that certifies there are no archaeological remains. Nevertheless, there are processes in case something should be identified during operations.</p> <p>This was confirmed through document review and interviews with management and workers.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>The follow up assessment in May 2023 confirms this criterion is fully meets.</p> <p>CMC has a simple supply chain with no external mineral inputs. There is a system in place to manage due diligence, including policies and procedures, however it has not been fully implemented.</p>
	31.a. Management System	<p>CMC has processes in place to manage due diligence in mineral supply chains. The policy refers to the OECD and the 5-step process and is available <a href="#">here</a>.</p> <p>CMC has a strong system of internal material controls.</p>

			<p>The policy is supported by a procedure, including a process to identify conflict-affected and high-risk areas.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• The management system is not fully implemented</li> <li>• Employees are not fully trained on the due diligence management system</li> <li>• The Supply Chain Policy is not clear that aspects related to the minerals supply chain are included</li> <li>• The sources to identify conflict-affected and high-risk areas are not verified</li> </ul> <p>The follow up assessment of May 2023 verified that the management system is fully implemented, and applied not just on mineral supply chains, but for all vendors and contracts.</p> <p>CMC has developed a procedure to identify conflict-affected and high-risk areas using internationally-accepted sources.</p>
	31.b. Red Flag Identification Process	Fully meets	<p>CMC has a process in place to identify conflict-affected and high-risk areas. It has determined Peru is not a conflict-affected or high-risk area. CMC has a process to conduct a red-flag assessment.</p> <p>No red flags were identified.</p>
	31.c. Risk Assessment Process	Not applicable	No red flags were identified.
	31.d. Risk Management Process	Not applicable	No red flags were identified.
	31.e. Public Reporting*	Fully meets	CMC covers due diligence in accordance to the five-step framework in the annual sustainability report, available <a href="#">here</a> .
32. Transparency and Disclosure*	Fully meets	<p>CMC publicly reports about environmental, social and governance issues. CMC participates in the EITI efforts of Peru. CMC's Sustainable Report follows GRI.</p> <p>The following observation was identified:</p> <ul style="list-style-type: none"> <li>• CMC does not publish its participation and support to EITI.</li> </ul>	

	More information is available <a href="#">here</a> and <a href="#">here</a> .
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## 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"/> Extension granted for criterion 19. Tailings Management.
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 4 June 2023.	<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 of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 4 June 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)	1 August 2022
Expiry Date of the Copper Mark (dd/mm/yyyy)	31 July 2025