The Copper Mark Summary Report

Participant Information

Name of the Site	Tyrone
Unique identifier provided by the Copper Mark	P0020
Address	Highway 90 South Tyrone Mine Rd. Tyrone, NM 88065
Country of Operation	United States of America
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
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper
Types of operations included in scope	
Mining	☒
Concentrate blending	☒ internal feedstock only
Solvent extraction and electrowinning	☒
Smelting	☐
Refining	☐
Other (*please explain*)	
Infrastructure owned or controlled by the site and included in scope	
Roads	☐
Rails	☐
Ports	☐

Other (*please explain*)	

Independent Review

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. As a result, the Independent Reviewer recommended the scope of the site assessment to the Copper Mark. The Independent Review took place on these dates:	18 January 2022 – 1 March 2022
The Independent Reviewer confirmed completeness, indicating available evidence for the assessor to review for all applicable criteria:	All criteria
The Independent Reviewer recommended the following criteria be included in the scope of the independent site assessment:	None. All were met through equivalency and top-off requirements with an assessment against the ICMM Performance Expectations

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 <u>*Copper Mark Recognition Process.*</u>

Equivalent System *(Name, date of assurance / certification)*	Review Process	Criteria Covered by Equivalency
ICMM PE Assessment May-June and December 2021	The Independent Reviewer confirmed the assurance / certification was: • 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	All applicable criteria This is inclusive of a "top-up assessment" to review the criteria that are identified as gaps between the ICMM PE and the RRA for criteria 2. Business Integrity, 10. Working Hours, and 11. Remuneration.

	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	
The Independent Reviewer recommended the following criteria be considered focus areas for the independent site assessment:	• 12. Occupational Health and Safety • 17. Freshwater Management and Conservation • 19. Tailings Management • 20. Pollution	
The Independent Reviewer recommended the following criteria be considered not applicable to the Site:	None	

Independent Site Assessment Information

Name of the Lead Assessor	David Shirley
Name of the Assessment Firm (if applicable)	Corporate Integrity, Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	May-June 2021 (Document review) 22-24 June 2021 (Site review) December 2021 (Interviews) Follow up assessment: December 2022 – April 2023
Assessment Period	1 January 2021 – 31 December 2021
Summary of the Assessment Methodology	The work was carried out in accordance with Corporate Integrity Ltd.'s assurance procedures. Assurance activities were risk based with focus on material issues and included the review of: 1. processes in place to identify and prioritise SD risks and opportunities during the reporting period; 2. the policies, systems and approaches that Freeport-McMoRan is using to manage these risks and opportunities; 3. the collection and assimilation of GRI reported performance information; and

	4. For the PE and CM validation, specific evidence to support Tyrone's self-assessment claims. In some cases, the assessors were able to rely on other third-party audits such as ISO14001, OSHAS18001 and financial audits, to avoid duplication of assurance effort.
	Corporate Integrity applied the following principles to provide COVID-19 constrained assurance remotely:
	1) Where the following conditions are all met Corporate Integrity considers that we have detailed knowledge of the site and operations sufficient to provide remote assurance:
	a) A physical site visit by at least one currently accredited Copper Mark assessor has been made in previous three years; and
	b) The site has been operating to ICMM Sustainable Development principles for the last three years or more.
	2) During the course of the remote assurance review, they may identify specific areas which will need to be covered at site during the next physical site visit, which should be conducted within an 18-month period.
	3) In the event that a follow up visit is not possible because of ongoing COVID-19 travel restrictions or because a site visit could not otherwise be achieved, the assurance status will need to be reviewed and a reassessment may be required.
	4) On a site-by-site basis the assessor will require that all equivalent third-party assurance remains valid during this period (e.g. ISO14001, OSHAS18001).
Summary of the Assessment Activities	The work was carried out in accordance with Corporate Integrity Ltd.'s assurance procedures, which involve:
	1. Desktop review and scoping for site review including:
	• Review of related corporate policies and their alignment to the scope of the assurance.
	• Review of site Risk Register.
	• Review of the site self-assessment and supporting evidence submitted.
	2. Site Review including:
	• Review of scope related risks at the site, including processes for evaluation and prioritisation. This involves interviews with senior management and all relevant departments.
	• Review of the systems and approaches that are used to manage scope related risks and issues. This involves interviews with relevant departments and personnel, review of additional documented evidence and physical observations (at operation and in local communities).

	• Review of procedures for the collection and assimilation of relevant performance information
	• Internal and external stakeholder interviews
	Close out meeting with management team, which includes presentation of findings and discussion on site's plans to close gaps to achieve 'meets' for all CM requirements and other improvement opportunities. Assurance Outcomes including:
	• Corporate Integrity provides an assurance statement based on the self-assessment.
	• Corporate Integrity provides a site management report which includes good practices, risks, and improvement opportunities

Summary of Findings

Criterion	Rating *Fully meets, partially meets, does not meet, not applicable*	Comments *Includes link to publicly available documents or supporting evidence where possible and at a minimum for those criteria with an ***
1. Legal Compliance	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone has formal systems in place for ISO 14001 and OSHAS 18001. Oversight on legal compliance is provided by the corporate legal affairs team.
2. Business Integrity	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone is governed by group-wide policies and compliance systems. All relevant personnel are subject to Principles of Business Conduct training in 2021. Stakeholder interviews confirmed awareness of the Principles of Business Conduct and evidence of ongoing compliance training. Tyrone prohibits facilitation payments, and none were reported in 2020.

3. Stakeholder Engagement*	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone has and actively uses a stakeholder engagement tool that links engagements with general categories of risk. There is evidence of strong community stakeholder engagement program in place, including a Community Partnership Panel.
		Interviewed stakeholders expressed appreciation that the company was willing to engage in such a stakeholder centric process in a trusting way.
		Tyrone has a working grievance mechanism in place, available **here**.
4. Business Relationships	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone has a process to manage risks associated with suppliers. The corporate team is responsible for onboarding suppliers to the company requirements under the code of conduct and human rights policy. The site level teams are aware of and manage risks with associated suppliers.
		At the corporate level, the company is developing increased due diligence requirements on suppliers and contractors and their activities.
5. Child Labor	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone is subject to corporate policies covering a range of worker rights issues including the Human Rights Policy, Principles of Business Conduct, and Supplier Code of Conduct.

| 6. Forced Labor | Fully meets | The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.

Tyrone is subject to corporate policies covering a range of worker rights issues including the Human Rights Policy, Principles of Business Conduct, and Supplier Code of Conduct.

Company policies have a zero tolerance for human trafficking and forced labor. At the corporate level, the company will develop awareness training to assist personnel in detecting warning signs. |
| --- | --- | --- |
| 7. Freedom of Association and Collective Bargaining | Fully meets | The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.

Tyrone is subject to corporate policies covering a range of worker rights issues including the Human Rights Policy, Principles of Business Conduct, and Supplier Code of Conduct. |
| 8. Discrimination | Fully meets | The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.

Tyrone is subject to corporate policies covering a range of worker rights issues including the Human Rights Policy, Principles of Business Conduct, and Supplier Code of Conduct. |
| 9. Gender Equality | Fully meets | The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.

Tyrone is subject to corporate policies covering a range of worker rights issues including the Human Rights Policy, Principles of Business Conduct, and Supplier Code of Conduct. |

		Interviews with workers confirmed feeling that career progression for women is well supported.
10. Working Hours	Fully meets	The follow up assessment confirmed this criterion as fully meets.
		The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Operating staff work in shifts and are paid overtime for more than 40 hours per week. Three percent of the time, the hourly operating staff working hours are more than 60 hours per week, which is voluntary.
		Workers are given 1 day off in 7 as well as annual leave.
		During the follow up assessment, it was confirmed that the Working Hours and Fatigue Management Policy was issued in July 2022, and was escalated from the initial intended "guidance" to "policy." The policy was rolled out at the site in July 2022, through communications and training presentations.
		As a result, the reported average weekly hourly working hours over a 28-day period was under 60 hours for 99.7% of the workers.
11. Remuneration	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		At the company level, compensation and benefits is market-based and competitive and informed by annual benchmarking and analysis.
		Employees generally reported regarding rates of pay as being favorable and supporting relatively comfortable living conditions in their local communities.
12. Occupational Health and Safety	Fully meets	The Independent Review confirmed that the site meets the requirement as

		validated through the ICMM PE Assessment.
		Tyrone is certified for ISO 45001.
		During the follow up assessment it was noted that the emergency response and contingency plan originally making this criterion partially meets is addressed in criterion 19. Tailings Management.
13. Grievance Mechanism	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone is subject to corporate policies covering a range of worker rights issues including the Human Rights Policy, Principles of Business Conduct, and Supplier Code of Conduct.
		Tyrone has a grievance process in place covering employees and contractors.
14. Environmental Risk Management	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone is certified for ISO 14001.
		Environmental risks are included in the site's risk register. Action plans for risk reduction and ongoing monitoring are in place.
15. Greenhouse Gas (GHG) Emissions*	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Scope 1 and Scope 2 emissions for Tyrone are reported in the Annual Report on Sustainability, available **here**. The company has a public reduction target by 15% per ton of copper cathode in the Americas by 2030 from a 2018 baseline. Carbon reduction programs at Tyrone will be aligned with this commitment.

16. Energy Consumption	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone reports on energy consumption as part of GRI reporting, **here**.
		Tyrone is also part of the Freeport wide initiatives on improving process efficiencies and considering emissions reduction on heavy mobile equipment.
17. Freshwater Management and Conservation	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone has programs in place for water stewardship which include ongoing evaluation and monitoring, co-ordination with the corporate water strategy team.
18. Waste Management	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Waste is managed as part of Tyrone's environmental management system, based on recovery, re-use and recycling.
		This is confirmed by review of the ISO14001 certification and reports, internal audit reports, scrap recycled log, and interviews with management.
19. Tailings Management	Partially meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone has a comprehensive tailings management program. There is an instrumentation monitoring system that supports Tyrone's tailings KPIs along with other inspection, monitoring, and oversight activities. The KPIs inform the Early Warning Dashboard reporting process. Through these regular activities, no

		emergency conditions were triggered. Regular maintenance activities continued with regular and special engineering inspections as appropriate by site tailings engineering and operations team.
		Tyrone has undertaken a preliminary semi quantitative risk evaluation as part of a corporate-wide move to implement the Global Industry Standard on Tailings Management (GISTM).
		Tyrone is implementing but has not fully implemented the GISTM as required by ICMM member companies.
		During the follow up assessment, it was confirmed that programme to implement GISTM is progressing at Tyrone with a completion of full GISTM implementation in 2025.
20. Pollution	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Pollution is managed as part of Tyrone's environmental management system. The main pollution risk is particulate emissions, which is managed through a system of monitoring and controls.
		This was confirmed through interviews with management, review of the risk evaluation and risk register entries, review of controls, review of community engagement activities on environmental issues including formal grievances, review of the environmental dashboard, and other document review.
21. Biodiversity and Protected Areas	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone follows corporate policies and guidelines related to biodiversity. The

		site regularly evaluates biodiversity as part of the risk register process, which involves identifying, assessing, and mitigating potential adverse impacts to biodiversity and ecosystem services. No World Heritage sites or designated protected areas are impacted by Tyrone operations.
22. Mine Closure and Reclamation	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone has closure planning activities and regulatory requirements for reclamation closure plans. The corporate commitment to addressing social aspects of closure is in the Social Performance Policy and includes social aspects of closure.
23. Community Health and Safety	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone's risk assessment process and Project Review includes coverage of impacts on community health and safety. This was confirmed by review of the stakeholder mapping and engagement program, community partnership panel meetings, and grievance process and records.
24. Community Development	Fully meets	The follow up assessment confirms this criterion is fully meets. The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone utilizes the Social Performance Management System, combined with various engagement initiatives including the Community Partnership Panel to support a range of community programs. In interviews, stakeholders remarked on

		the site's generosity in economic development and philanthropic interests.
		Tyrone has initiatives in place to encourage local and regional sourcing as part of the ongoing engagement process.
		During the follow up assessment, it was verified that the North American Local Procurement Strategy SOP of September 2021 is rolled out at site through training. Entries of local procured goods and services in the system as well as a summary report showing the total payments for local goods and services procured during 2022 confirm that this is fully implemented.
25. Artisanal and Small-Scale Mining	Not applicable	Previous site visits confirm there is no ASM in the area of influence.
26. Human Rights	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.
		Tyrone is subject to corporate policies, processes and compliance requirements relating to human rights, including risk evaluation and stakeholder mapping and engagement. There are established grievance processes in place for both the workforce and community. In 2020 these did not raise any Human Rights related grievances.
		Tyrone was part of a human rights impact assessment completed for the New Mexico facilities in which existing known risks were confirmed and new risks were added to the risk register and plans to address those risks were developed.
27. Security and Human Rights	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment.

		Tyrone is subject to corporate policies and compliance requirements relating to security and human rights. Security personnel at the site are all company employees.
28. Indigenous Peoples' Rights	Fully meets	The follow up assessment confirms this criterion is fully meets. The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone has a management system to articulate potential issues with local indigenous tribes and to build trust between the company and the tribes. Risks are identified in the risk register and the project risk review. During the follow up assessment, it was verified that Tyrone has implemented the "Building Trust with Tribes" team as part of a broader ESG oversight team charged with engaging with local tribes on a range of issues. Evidence of regular meetings, agendas, and engagement on local activities demonstrate the full implementation of the team and corresponding procedures.
29. Land Acquisition and Resettlement	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone has no involuntary physical or economic displacement of local communities.
30. Cultural Heritage	Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone addresses cultural heritage in the risk register. There is evidence that third party archaeological surveys are carried out prior to working on new ground.

			Interviews with stakeholders confirmed that Tyrone is working to address identified risks.
31. Due Diligence in Mineral Supply Chains		Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone has a management system reasonable for the type of operations.
	31.a. Management System	Fully meets	Tyrone has a management system, and it is trained to relevant employees.
	31.b. Red Flag Identification Process	Fully meets	Tyrone is identified by the company risk assessment as "level 1" not operating in a CAHRA nor having external inputs.
	31.c. Risk Assessment Process	Not applicable	Tyrone has not identified red flags.
	31.d. Risk Management Process	Not applicable	Tyrone has not confirmed red flags.
	31.e. Public Reporting*	Fully meets	Tyrone's Step 5 report is available **here**.
32. Transparency and Disclosure*		Fully meets	The Independent Review confirmed that the site meets the requirement as validated through the ICMM PE Assessment. Tyrone is covered in the company's annual reporting, done in accordance with the GRI standards, and available **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.	☒ 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 6 June 2023.	
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 6 June 2023.	☐
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.	☐
Limitations:	Assessment was conducted remotely due to Covid-19 travel restrictions.
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)	9 March 2022
Expiry Date of the Copper Mark (dd/mm/yyyy)	8 March 2025