



RESPONSIBLY
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PRODUCED
MOLYBDENUM



RESPONSIBLY
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NICKEL



RESPONSIBLY
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ZINC

Assessment Summary Report

Participant Information

Name of the Site	Climax Molybdenum B.V. Rotterdam
Unique identifier provided by the Copper Mark	P0076
Address	Theemsweg 20 3197 KM Botlek Rotterdam
Country of Operation	The Netherlands
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Technical molybdic oxide, ammonium molybdate and pure molybdic oxide
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Molybdenum
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Molybdenum
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
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"/> Roasting
Refining	<input checked="" type="checkbox"/>
Fabrication	<input type="checkbox"/>

Other (<i>please explain</i>)	Molybdenum roasting, refining, and conversion
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

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	Review Process	Criteria Covered by Equivalency
ISO 14001:2015 25 January 2023	<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 	14. Environmental Risk Management
ISO 45001 27 January 2023	<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 	12. Occupational Health and Safety

	<p>reassessment are underway.</p> <ul style="list-style-type: none"> • 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 Assessment Firm (if applicable)	EY
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Document review and prep: 15 March – 15 April 2023 Onsite: 19-21 April 2023
Assessment Period	1 January 2022 – 30 April 2023
Summary of the Assessment Methodology	<p>The assessment was conducted using the AICPA and ISAE 3000 methodologies against the Copper Mark Criteria for Responsible Production and the ICMM Performance Expectations.</p> <p>About the company: Rotterdam is part of Climax Molybdenum B.V., which is a subsidiary of Freeport-McMoRan Inc.</p> <p>Permanent workers: 83 Contract workers: 26</p>
Summary of the Assessment Activities	<p>The assessment consisted of document review and preparation. While on site, the following activities took place:</p> <p><u>Day 1</u></p> <ul style="list-style-type: none"> • Opening meeting • Site tour – roaster • Review of information related to environmental criteria. • Review of information related to health and safety. • Review of information related to community, security, and human rights.

	<ul style="list-style-type: none"> • Review of information related to supply chain. • Review of information related to human resources and governance. • Internal interviews <p><u>Day 2</u></p> <ul style="list-style-type: none"> • Internal interviews • External interviews <p><u>Day 3</u></p> <ul style="list-style-type: none"> • External interviews • Site tour – chemical and acid plant • Informal closing meeting
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Climax Molybdenum B.V. Rotterdam (Climax Rotterdam) has systems to maintain compliance with applicable law.</p> <p>Human resources receive advice and regular updates on legal issues including reports on new laws and legislation. Twice per year, there is an audit for human resources and salary admin purposes. External legal counsel is in frequent contact with the site to ensure compliance.</p> <p>This was confirmed through management interviews with site personnel to understand how legal compliance is tracked, how new laws and their potential impact are assessed and what system(s) are used; interview with external counsel; and a review of documents including register of legislation, ISO certifications, corporate environmental assurance audits, internal health and safety audits, environmental permits, sustainable development risk registers, and monthly environmental compliance reporting.</p>
2. Business Integrity	Fully meets	Climax Rotterdam implements a management system that prohibits and

		<p>effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.</p> <p>Policies are primarily driven by corporate's Principles of Business Conduct (PBC). Employees are trained on the principles of business conduct and anticorruption. No facilitations were applicable in the assessment period.</p> <p>This was confirmed through interviews with management and site personnel to understand what policies and practices are in place to prevent bribery and facilitation payments; and a review of documents including training records, SharePoint site with policies, and corporate quarterly reports.</p>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>Climax Rotterdam has a process to carry out stakeholder mapping, and to implement an engagement plan, and to establish a grievance mechanism.</p> <p>This is primarily done through Burengesprek Botlek-Europoort (BBE) which is an initiative of companies active in the Botlek Europoort area, the Municipality of Rotterdam, DCMR Milieudienst Rijnmond and the Rotterdam-Rijnmond Safety Region. The goal of Burengesprek Botlek Europoort is to have an open and constructive conversation between companies, governments, and local residents. DCMR is a member of this group, and they serve the community as the Environmental Protection Agency, with an active grievance system in place.</p> <p>Because of the nature of complaints and inability to assign issues in the community to one company or another, citizens file complaints through DCMR, who routes them to the BBE group, so members can then determine which company is responsible for which complaint, and how best to resolve the complaint, with the oversight of DCMR.</p>

		<p>There have been no external grievances received in the previous 3 years.</p> <p>The grievance mechanism is accessible <u>here</u>.</p> <p>This was confirmed through management interviews; interviews with stakeholders to obtain information on whether stakeholders are aware of the grievance mechanism; and a review of documents including the stakeholder map and analysis, meeting notes from the port of Rotterdam company association, the risk register, and the community grievance SOP.</p>
<p>4. Business Relationships</p>	<p>Partially meets</p>	<p>Climax Rotterdam has in place processes to promote responsible business practices with significant business partners, including suppliers. Climax Rotterdam utilizes Ariba to share information on the Freeport Business Partner Code of Conduct, issue questionnaires, validate new suppliers, and monitor and assess business partners. This is complemented by a process to conduct further due diligence with third parties, such as NGOs, when questions arise.</p> <p>The site has signed the International Responsible Business Conduct Agreement (IRBC) in 2019. Through their participation in this, they actively work with several organizations in the metals sector to advocate for and encourage international responsible business conduct.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • The mechanism to demonstrate and evaluate the implementation of these policies with suppliers and contractors is not operating effectively, as suppliers are not aware of specific policies on supplier code of conduct or human rights. • Revised policies and / or code of conduct are only shared with new

		<p>suppliers and not existing suppliers until the contract is renewed.</p> <p>This was confirmed through interviews with management; interviews with contractors; and a review of documents including the Business Partner Code of Conduct, sample communications with business partners, and a sample supplier of files.</p>
5. Child Labor	Fully meets	<p>Climax Rotterdam implements a management system that prevents the employment of children under the age of 15, prevents the worst forms of child labor, and prevents the exposure of employees under the age of 18 to hazardous work. Policies are clear that no worker under the age of 18 shall be employed, and worker interviews confirmed no employee or contractor had experienced or witnessed an individual younger than the age of 18 working at the site. Age is verified through passports before employment begins.</p> <p>This was confirmed through interviews with management; interviews with workers; site observation; and a review of documents including the human resources handbook, human rights policy, and a sample grievance record.</p>
6. Forced Labor	Fully meets	<p>Climax Rotterdam implements a management system that prevents the use of any forms of forced labor and participation in acts of human trafficking.</p> <p>This was confirmed through interviews with management; interviews with workers; site observations; and a review of documents including the human resources handbook, Human Rights policy, and a sample grievance record.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>Climax Rotterdam has systems in place to respect employees' rights to freedom of association and to collective bargaining, participate in collective bargaining processes in good faith and</p>

		<p>not obstruct alternative means of association where there are legal restrictions.</p> <p>The site is unionized, with unions holding meetings at the office. There is a Collective Labor Agreement (CLA) in place publicly available and distributed to employees. Negotiations take place close to the CLA expiration date. There are also a works council, governed by local law.</p> <p>This was confirmed through interviews with management; interviews with workers; site observations; and a review of documents including the CLA, negotiations meeting minutes, and the guidance regulating works councils.</p>
8. Discrimination	Fully meets	<p>Climax Rotterdam has systems in place to prevent and address all forms of harassment and discrimination. In addition to the policy in the human rights policy, workers are regularly trained on bullying and harassment. A sampled grievance indicated a case of discrimination, which, after follow-up in accordance with the process, was deemed unsubstantiated.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the human resources manual, the human rights policy, the grievance procedure and a sampled record, and the discrimination and harassment policy.</p>
9. Gender Equality	Fully meets	<p>Climax Rotterdam has a system to continually assess and monitor progress to ensure the implementation of a policy on gender equality in the workplace.</p> <p>There are many women in management, as well in the labs. There is an equal opportunities policy and a corporate-level inclusion and diversity policy. It is complemented by a policy on discrimination, sexual harassment, and harassment, including</p>

		<p>resources for navigating these actions in the workplace.</p> <p>There are comprehensive laws and regulations around pregnancy, maternity, and parental leave, and around parttime work.</p> <p>Human resources are responsible for code of conduct training including the need for respectful behavior and physical and psychological safety. Information is provided to new employees about how to report a complaint.</p> <p>At the corporate level, there is a gender pay gap analysis each year conducted across sites.</p> <p>This is confirmed through interviews with management; interviews with workers who confirmed they had not seen or experienced what they believed to be discrimination due to gender or sex; and a review of documents including the gender pay gap study, discrimination and sexual harassment policy, and grievance log.</p>
10. Working Hours	Fully meets	<p>Climax Rotterdam has a system to keep employees' total regular and overtime working hours to 60 hours per week unless defined otherwise by applicable law or a collective bargaining agreement; and to ensure overtime is voluntary, provide one rest day in seven; and, to provide annual leave.</p> <p>Working hours are governed by the CLA and local legislation. In addition to being a unionized site, there is an active works council, also governed by law. Based on an average hour's analysis, only 6.7% of employees average more than 40 hours a week, and 0% average more than 50. Workers are able to confirm hours and note overtime is voluntary, fair, and never forced.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including</p>

		the analysis, policy detailing the requirements and restrictions of working hours for employees in order to manage fatigue and provide a safe, healthy working environment, and samples of communication on the working hours requirements.
11. Remuneration	Fully meets	<p>Climax Rotterdam pays wages that equal or exceed the national minimum wage, the appropriate industry wage (if higher), or a living wage.</p> <p>At the corporate level, there is a living wage analysis for all sites on an annual basis. The analysis demonstrates the site pays workers above the living wage even for the lowest grade. The employer organization similarly conducts an annual assessment.</p> <p>This was confirmed through interviews with management interviews with workers; and a review of documents including the living wage analysis, employee contracts, and the CLA.</p>
12. Occupational Health and Safety	Fully meets	The assessment confirmed Climax Rotterdam has a valid ISO 45001 certificate.
13. Grievance Mechanism	Fully meets	<p>Climax Rotterdam has established and implements a grievance mechanism accessible to all employees, aligned with the UNGP effectiveness criteria. There is a grievance hotline which supports anonymous internal reporting.</p> <p>A grievance was selected at random to test the system and ensure adherence with the process.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the grievance procedure, a sampled grievance, and the list of grievances over the assessment period.</p>
14. Environmental Risk Management	Fully meets	The assessment confirmed Climax Rotterdam has a valid ISO 14001 certificate.

<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>Climax Rotterdam has processes in place to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting protocols.</p> <p>The Netherlands set a goal for all companies to reduce emissions by 55% by 2030, compared to 1990, and net zero by 2050. Climax Rotterdam has an Energy Team with defined projects to meet this goal. The site monitors GHG emissions and corporate reports in accordance with the GHG protocol requirements, including information about Rotterdam. More information is available here.</p> <p>The absolute reduction target established at the corporate level for primary molybdenum sites, including Rotterdam, is 35% reduction in Scope 1 and 2 emissions by 2030, compared to the 2018 baseline.</p> <p>This was confirmed through interviews with management; and a review of documents including the corporate climate strategy, emissions reports, energy team projects for 2022-2023, information about current consumption, and annual reports.</p>
<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>Climax Rotterdam implements and quantifies energy efficiency improvements and increased use of renewable energy to reduce total energy consumption and/or energy intensity. The absolute reduction target is 35% reduction in Scope 1 and 2 emissions by 2030, compared to the 2018 baseline.</p> <p>There is a plan in place to meet the corporate GHG reduction goals, focused on smaller steps now and larger steps when proven technologies are available. This includes electrification and optimization of key machinery and processes. It is based on a study done to map options for further decarbonization.</p>

		<p>This was confirmed through interviews with management; and a review of documents including the corporate climate strategy, energy team projects for 2022-2023, and reports on the amount of energy being produced by the solar panels.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>Climax Rotterdam has a system to conduct a comprehensive assessment of water-use impacts and risks in collaboration with local government authorities, such as the environmental agency, and to implement measures to ensure that water consumption does not restrict availability/access for other water users or reduce the range and populations of fauna and flora in the catchment area of the site / facility.</p> <p>It is noted that the site is in an area where water scarcity is not an issue. Nonetheless, Climax Rotterdam has begun to implement some water reduction/recycling initiatives.</p> <p>Water data is collected on a frequent basis and reviewed at least annually by corporate for inclusion within the Annual Sustainability Report.</p> <p>While groundwater contamination was a historical issue, a study by the local environmental agency in May 2022 concluded that it is currently a stable situation primarily addressed through remediation when operations close. For now, the site continues to monitor the groundwater on an annual basis. In addition, beginning in 2023, Climax Rotterdam began a review of the wastewater situation to answer questions about contamination reduction, combining wastewater streams, increasing stormwater usage, and other points anticipating future regulatory changes.</p> <p>This was confirmed through interviews with management; and a review of documents including various wastewater datasets, the water</p>

		accounting framework spreadsheet, and third-party investigative reports.
18. Waste Management	Fully meets	<p>Climax Rotterdam implements a risk-based waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (hazardous, non-hazardous, and inert).</p> <p>Examples of how the mitigation hierarchy is implemented were demonstrated on site.</p> <p>Climax Rotterdam is subject to local reporting requirements on air emissions, water intake and discharge, energy use, and waste metrics to the local government for compliance with local regulations.</p> <p>This was confirmed through facility walkthrough; interviews with management; and a review of documents including waste management procedures, monthly and annual reporting, flyers with guidance on recycling, communications on reduction, reuse, and processes for storing and containing hazardous substances.</p>
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	<p>Climax Rotterdam implements the mitigation hierarchy to avoid, minimize, reduce, and compensate for the adverse impacts of pollution on human health and the environment.</p> <p>Climax Rotterdam is subject to local reporting requirements on air emissions, water intake and discharge, energy use, and waste metrics to the local government for compliance with local regulations.</p> <p>This is confirmed through interviews with management; interviews with external stakeholders on their perspective on any historic or current pollution to which the site may have contributed; and a review of documents</p>

		including the environmental management system and SOPs, environmental permits, annual reporting, monthly reporting, and environmental risk analysis.
21. Biodiversity and Protected Areas	Fully meets	<p>Climax Rotterdam implements the mitigation hierarchy to avoid, minimize, reduce, and compensate for adverse impacts on biodiversity; to avoid adverse impacts to Critical Habitats or Endangered Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless specifically and legally permitted.</p> <p>The main biodiversity issue is related to seagulls, which are very active in the port area and commonly create nests on the property. In the Netherlands, seagulls are a protected species. Because of the safety and hygiene considerations posed by the seagulls when they are defending their nests, confirmed by a third-party study, the site has applied steps 1 and 2 of the mitigation hierarchy, with an ultimate goal of deterring the seagulls from nesting on the property.</p> <p>No World Heritage sites or designated protected areas are impacted by operations.</p> <p>This was confirmed through site observations; interviews with management; and a review of documents including environmental permits, the seagull management plan, and the report from the independent third party on the risks to health and hygiene from seagulls protecting their nests.</p>
22. Mine Closure and Reclamation	Not applicable	This criterion is not applicable to non-mining operations. Nonetheless, assessors were able to evaluate the post closure financial obligation and these financials are audited by an external verifier each year.

<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>Climax Rotterdam implements a management system to monitor, avoid, minimize, reduce, and compensate for adverse impacts on community health and safety.</p> <p>Climax Rotterdam performs a quarterly risk assessment which is documented within their risk register, of all potential risks that could occur and impact health, safety, environment, or the local community. Of note are two monitored potential risks to the community: Risk of potential chronic health problems for the employees due to exposure to dust; and risk to soil and groundwater pollution from molybdenum or acid.</p> <p>In addition, Climax Rotterdam engages with local fire department and performs a number of emergency response scenarios, including "non-scheduled" surprise drills where site's health and safety team acts as though there was an emergency and monitors how people react.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders to understand their perspective on any historic or current negative impacts to which the site may have contributed; and a review of documents including the ISO certifications, risk register, and a study a study into substances of very high concern.</p>
<p>24. Community Development</p>	<p>Fully meets</p>	<p>Climax Rotterdam has a process to identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development.</p> <p>Climax Rotterdam is a member of Burengesprek Botlek-Europoort (BBE) which is an initiative of companies active in the Botlek Europoort area, the Municipality of Rotterdam, DCMR Milieudienst Rijnmond and the Rotterdam-Rijnmond Safety Region. The goal of Burengesprek Botlek</p>

		<p>Europoort is to have an open and constructive conversation between companies, governments, and local residents. Through BBE, Climax Rotterdam is engaged in community outreach such as community needs assessments. These efforts are complemented by donations to local charities and community groups, directly, through employee suggestions and through Deltalinqs Donation Fund (Port of Rotterdam companies).</p> <p>In addition, there is an emphasis to purchase locally as much as possible, with a focus on purchasing parts or services on equipment and construction.</p> <p>This was confirmed through interviews with management; interviews with BBE; and a review of documents including the stakeholder overview, list of donations and charities, details on local spend, and the social performance policy.</p>
<p>25. Artisanal and Small-Scale Mining</p>	<p>Not applicable</p>	<p>The assessment confirmed there is no ASM in the area of influence.</p>
<p>26. Human Rights</p>	<p>Fully meets</p>	<p>Climax Rotterdam has a process to implement the UN Guiding Principles on Business and Human Rights including human rights due diligence. Policies are primarily driven by corporate policies and implemented at site through mechanisms to assess potential and actual human rights risks and impacts, in particular with suppliers and contractors.</p> <p>The site has signed the International Responsible Business Conduct Agreement (IRBC) in 2019. Through their participation in this, they actively work with several organizations in the metals sector to advocate for and encourage international responsible business conduct. The IRBC Agreement focuses on the long-term social and environmental effects in the metals sector in relation to the sourcing</p>

		<p>of raw materials and the procurement of services.</p> <p>There is a grievance mechanism in place. No adverse human rights impacts were detected during the assessment.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; interviews with workers; a desk-based review on whether human rights issues have been raised against the site or the region in which the site operates (no results were found); and a review of documents including the supplier code of conduct, policy for grievances, IRBC agreement, and the human rights policy.</p>
27. Security and Human Rights	Not applicable	<p>This criterion is not applicable to non-mining operations. Nevertheless, because the assessment was conducted also against the ICMM Performance Expectations, it was determined that Climax Rotterdam has a system to implement the Voluntary Principles on Security and Human Rights when engaging with private or public security forces.</p>
28. Indigenous Peoples' Rights	Not applicable	<p>The assessment confirmed there are no indigenous peoples in the area of influence.</p>
29. Land Acquisition and Resettlement	Fully meets	<p>Climax Rotterdam has a Management of Change process in place in case of future expansion. The intent is to avoid the consequences of unforeseen safety, health and environmental hazards, and further details that the primary objectives of the Management of Change process is to ensure there is a proper level of review and approval, the change complies with all regulations and permits, and upstream and downstream "customers" are included in the process and are made aware of potential impact.</p> <p>During the assessment, it was confirmed that there are no significant new projects underway at Rotterdam</p>

		<p>operations. The site is physically restricted and cannot expand its footprint (land) any larger due to other industrial entities surrounding the site on all sides.</p> <p>This was confirmed through interviews with management; and site observations.</p>
<p>30. Cultural Heritage</p>	<p>Fully meets</p>	<p>Climax Rotterdam has a process to identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage.</p> <p>It is noted that below the original surface level (which is approximately 5 meters below the current surface level) there may be archaeological findings that would have to be preserved should the site close operations or significantly change operations.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of documents including the risk register, social performance policy, and toolbox presentations about measuring potential environmental impacts.</p>
<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>Freeport-McMoRan has comprehensive and established policies, processes, and management frameworks in place, which fully align with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals for Conflict Affected and High-Risk Areas and the Copper Mark Joint Due Diligence Standard. Climax Rotterdam is fully covered by these systems.</p> <p>Rotterdam has a simple supply chain with few suppliers.</p> <p>This was confirmed through interviews with management; and a review of documents including the Corporate/Sales & Marketing SOPs for implementation of the 5-step process for implementation of the OECD guidelines in mineral purchases, review</p>

		of minerals supply chains and Freeport-McMoRan assessment of red flag issues and associated management actions at the site, and the process for assessing risk in purchases of goods and services.
31.a. Management System	Fully meets	<p>At corporate level, there is a publicly available Responsible Sourcing of Minerals Policy, supplier questionnaires, a CAHRA identification tool, and training to support implementation.</p> <p>The policy is overseen by the Sustainability Leadership Team at corporate level and implemented by the Responsible Production Frameworks and Sustainability Department. There is a procedure to control materials and equipment entering and exiting the facility.</p> <p>Authorities and accountabilities and resources are well allocated proportional to the size and complexity of the operations. Senior leadership is responsible for review and revision of the system.</p> <p>There are channels to address supply chain concerns early and remediate impacts, which are described in the Business Partner Code of Conduct, the Principles of Business Conduct, and at Fcx.com</p>
31.b. Red Flag Identification Process	Fully meets	<p>At the corporate level, there is a process to identify CAHRAs.</p> <p>Molybdenum concentrates are sourced from two mines, one in Chile, one in Peru. The Freeport-McMoRan CAHRA assessment has determined that Chile is not a CAHRA. Peru is classified as “orange.” In accordance with the company policy, a classification of orange requires awareness training and Annex II risk prevention. The assessment confirmed Annex II risk prevention, training, and awareness raising to suppliers of minerals and</p>

			metals, employees, customers, and other interested stakeholders.
	31.c. Risk Assessment Process	Not applicable	Not applicable as no red flags were identified.
	31.d. Risk Management Process	Not applicable	Not applicable as no red flags were identified.
	31.e. Public Reporting	Fully meets	The corporate Step 5 report covers the management system implementation at Climax Rotterdam. It is available here .
32. Transparency and Disclosure		Fully meets	<p>At the corporate level, there is an annual reporting process, which includes information about Climax Rotterdam’s environmental, social, and governance data. The report is in accordance with the GRI Standards: The report is independently assured.</p> <p>The corporate Annual Sustainability Report and other relevant reports are available here.</p> <p>At corporate level, there is a statement of support for EITI, available on the EITI website.</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 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 11 April 2025.	<input checked="" 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	<input type="checkbox"/>

improvement to fully meet all applicable Copper Mark Criteria by 11 April 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 type="checkbox"/>
The Molybdenum Mark	<input checked="" type="checkbox"/>
The Nickel Mark	<input 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 Molybdenum Mark is awarded	2 October 2023
Expiry Date of The Molybdenum Mark	1 October 2026