



RESPONSIBLY
PRODUCED
COPPER



RESPONSIBLY
PRODUCED
MOLYBDENUM



RESPONSIBLY
PRODUCED
NICKEL



RESPONSIBLY
PRODUCED
ZINC

Assessment Summary Report

Participant Information

Name of the Site	Climax Molybdenum U.K. Limited Stowmarket
Unique identifier provided by the Copper Mark	P0077
Address	Needham Road Stowmarket Suffolk IP142AE
Country of Operation	United Kingdom
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	FeMo production
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 type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input type="checkbox"/>

Other (<i>please explain</i>)	Conversion of roasted oxide into Ferromolybdenum
Infrastructure owned or controlled by the site and included in scope	
Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	

Equivalent Systems

<p>The following equivalent systems were applied:</p> <p><i>Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the <u>Copper Mark Recognition Process</u>.</i></p>		
Equivalent System	Review Process	Criteria Covered by Equivalency
<p>ISO 14001:2015 7 September 2022</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> Valid at the time of the review No more than 24 months old and / or plans for reassessment are underway. In effect for an additional 12 months and / or plans for reassessment are underway Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials Accompanied by improvement plans where applicable 	<p>14. Environmental Risk Management</p>
<p>ISO 45001 27 January 2023</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> Valid at the time of the review 	<p>12. Occupational Health and Safety</p>

	<ul style="list-style-type: none"> • No more than 24 months old and / or plans for reassessment are underway. • In effect for an additional 12 months and / or plans for reassessment are underway • Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials • Accompanied by improvement plans where applicable 	
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Independent Site Assessment Information

Name of the 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: 24-25 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: Climax Molybdenum U.K. Limited, Stowmarket (Stowmarket) is part of Climax Molybdenum, which is a subsidiary of Freeport-McMoRan Inc.</p> <p>Permanent workers: 78 Contract workers: 5</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 – process from the receipt of material through the point of exit • Review of information related to environmental criteria.

	<ul style="list-style-type: none"> • Review of information related to health and safety. • Review of information related to community, security, and human rights. • Review of information related to human resources and governance. • Review of information related to supply chain. • Internal interviews <p><u>Day 2</u></p> <ul style="list-style-type: none"> • Internal interviews • External interviews • Informal closing meeting
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Climax Molybdenum U.K. Limited, Stowmarket (Stowmarket) has systems to maintain compliance with applicable law.</p> <p>Each department is responsible for undertaking legal compliance reviews. Human resources receive advice and updates from local and corporate legal teams, The safety and environmental teams maintain legal compliance registers using online resources and environmental compliance is audited every three years.</p> <p>This was confirmed through management interviews with site personnel to understand how legal compliance is tracked; and a review of documents including register of legislation, ISO certifications, compliance tracking system, risk registrar, and monthly environmental compliance reports.</p>
2. Business Integrity	Fully meets	<p>Stowmarket implements a management system that prohibits and 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, the corporate compliance hotline, corporate compliance process, internal audit risk assessments, and accounting controls.</p>
<p>3. Stakeholder Engagement</p>	<p>Partially meets</p>	<p>Stowmarket has a process to carry out stakeholder mapping, and to implement an engagement plan, and to establish a grievance mechanism.</p> <p>Stowmarket has conducted stakeholder mapping, stakeholder engagement, and has adequate (fit for purpose) grievance mechanisms in place, including through letters, phone, email, or visit freeportinmycommunity.com to find the anonymous grievance hotline.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • The grievance mechanism is not sufficiently known to the local community. • There is not adequate monitoring for effectiveness of stakeholder engagement and grievance resolution activities. <p>It is noted that no formal grievances have been received by the community in the past 4 years.</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</p>

		mapping tool, complaints procedure, and the community grievance SOP.
4. Business Relationships	Partially meets	<p>Stowmarket has in place processes to promote responsible business practices with significant business partners, including suppliers. Stowmarket utilizes Ariba to share information on the Freeport supplier code of conduct, issue questionnaires, validate new suppliers, and monitor and assess business partners. The supplier code of conduct is embedded in contracts with suppliers.</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 suppliers and not existing suppliers until the contract is renewed. <p>This was confirmed through interviews with management; interviews with a supplier; and a review of documents including the business partner code of conduct, sample communications with business partners, and a sample of supplier files.</p>
5. Child Labor	Fully meets	<p>Stowmarket 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, with the exception</p>

		<p>of apprentices. Age is verified before work begins.</p> <p>Stowmarket occasionally has apprentices working at their facility, which come from the nearby secondary school. As these students are under the age of 18, Stowmarket drafted a specific risk assessment. During the assessment, there were no students engaged in the apprenticeship program.</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>Stowmarket 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>Stowmarket 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 not obstruct alternative means of association where there are legal restrictions.</p> <p>At Stowmarket, all hourly workers are represented by a Collective Bargaining Agreement (CBA) through a union on site. The CBA is negotiated every 3 years.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the employee guide to policies and procedures.</p>

<p>8. Discrimination</p>	<p>Fully meets</p>	<p>Stowmarket 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.</p> <p>There is a site-based Dignity at Work policy, which includes policies against harassment and discrimination. Workers are trained on the policy.</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, disciplinary procedure, and the discrimination and harassment policy.</p>
<p>9. Gender Equality</p>	<p>Fully meets</p>	<p>Stowmarket has a system to continually assess and monitor progress to ensure the implementation of a policy on gender equality in the workplace.</p> <p>In addition to a corporate Inclusion and Diversity Policy, Stowmarket has an Equal Opportunities Policy and Dignity at Work policy, which specifically applies to harassment and bullying - whether on the grounds of sex, pregnancy, maternity, gender reassignment, sexual orientation, marriage, and others.</p> <p>On an annual basis at corporate level there is a gender pay gap analysis each year across all sites, focused on equal pay for equal work, which included a review of gender as well as ethnicity.</p> <p>Stowmarket acknowledges no females currently work in the plant operations (all individuals who identify as female work in the office or admin environment).</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</p>

		including the gender pay gap study, dignity at work policy, data points related to percentage of female workers and women in leadership roles, and training materials.
10. Working Hours	Fully meets	<p>Stowmarket 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>Stowmarket complies with United Kingdom working hour laws.</p> <p>At corporate level, there is a Working Hours & Fatigue Management Policy, which requires that working hours do not exceed 60 hours per work and the conditions for voluntary overtime.</p> <p>A sample of working hours did not reveal working more than 48 hours per week on average over a 17-week period.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including a worker's time cards, policy detailing the requirements and restrictions of working hours for employees in order to manage fatigue and provide a safe, healthy working environment, parental leave, flexible work schedule, and other related policies and procedures.</p>
11. Remuneration	Fully meets	<p>Stowmarket 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.</p> <p>This was confirmed through interviews with management interviews with workers; and a review of documents</p>

		including the living wage analysis, online tools for Employees that provides transparency into their total compensation package, and management of paid sick leave.
12. Occupational Health and Safety	Fully meets	The assessment confirmed Stowmarket has a valid ISO 45001 certificate.
13. Grievance Mechanism	Fully meets	<p>Stowmarket has established and implements a grievance mechanism accessible to all employees that is aligned with the UNGP effectiveness criteria. There is a grievance hotline which supports anonymous internal reporting.</p> <p>Only one grievance was received over the past 12 months. The assessment demonstrates the grievance was handled in line with the site-developed Grievance Procedure SOP.</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 Stowmarket has a valid ISO 14001 certificate.
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>Stowmarket has processes in place to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting protocols.</p> <p>Corporate measures and reports energy and GHG usage annually in accordance with the GHG protocol, including information about Stowmarket. Reports have been historically assured using a third party.</p> <p>The absolute reduction target established at the corporate level for primary molybdenum sites, including Stowmarket, is 35% reduction in Scope 1 and 2 emissions by 2030, compared to the 2018 baseline.</p> <p>Significant efforts are underway to build a solar panel field and battery storage</p>

		<p>for excess energy on site which would provide 54% of current site electricity use.</p> <p>Metrics are tracked year over year.</p> <p>More information is available here.</p> <p>This was confirmed through interviews with management; and a review of documents including the corporate climate strategy, emissions reports, environmental metrics, and GHG collection forms.</p>
16. Energy Consumption	Fully meets	<p>Stowmarket implements and quantifies energy efficiency improvements and increased use of renewable energy to reduce total energy consumption and/or energy intensity.</p> <p>Stowmarket is engaged in a project to build a solar panel field and battery storage for excess energy on site which would provide 54% of current site electricity use.</p> <p>Environmental metrics are gathered and reported annually by corporate in accordance with the GHG protocol.</p> <p>This was confirmed through interviews with management; and a review of documents including the energy and climate change review report, climate report, meters and trending data, energy efficiency report, and scopes 1 and 2 emissions data.</p>
17. Freshwater Management and Conservation	Fully meets	<p>Stowmarket has a system to conduct a comprehensive assessment of water-use impacts and risks 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. It is primarily supported through a water accounting framework, which details the amount of water withdrawn and outflows by type, as well as the amount of water reused and recycled.</p>

		<p>Stowmarket does not use any water in production. Water is only used for hygiene, dust suppression and washing parts/vehicles. Surface water runoff and groundwater is spot sampled on an ongoing basis to assess risk.</p> <p>While molybdenum was detected within the groundwater during a recent study, the report noted that groundwater quality at the site has remained relatively consistent since the collection of the baseline reference data and there has been no significant change in groundwater quality.</p> <p>This was confirmed through interviews with management; and a review of documents including the water accounting framework, groundwater monitoring data, and environmental metrics including water. Due to the low-risk nature, no external stakeholder interviews were conducted for this criterion.</p>
18. Waste Management	Fully meets	<p>Stowmarket 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>There is evidence of recycling of slag from the FeMo process to help build roadways. Dust, scale, and top crust are reinserted into operations.</p> <p>Roasted molybdenum concentrate is classified as hazardous and is labeled accordingly.</p> <p>This was confirmed through facility walkthrough; interviews with management; and a review of documents including waste management procedures, recycling procedures, and recycling and reuse report.</p>
19. Tailings Management	Not applicable	<p>This criterion is not applicable to non-mining operations.</p>

<p>20. Pollution</p>	<p>Fully meets</p>	<p>Stowmarket implements the mitigation hierarchy to avoid, minimize, reduce, and compensate for the adverse impacts of pollution on human health and the environment.</p> <p>Stowmarket's largest sources of pollution is air pollution, for which there is an air environmental management plan requiring minimization to levels permitted by local regulation.</p> <p>A recent land management EMP identified potential opportunities to mitigate impact resources. There are EMPs for air, asbestos, backflow, spill, and waste, among others.</p> <p>Potential sources of pollution are identified and assessed primarily through a corporate risk matrix and procedures.</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 including the environmental procedures manual, waste minimization plan, permits, recycling programs, and training records.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Fully meets</p>	<p>Stowmarket 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>Stowmarket is able to demonstrate how the mitigation hierarchy is applied to new projects, as well as current efforts to protect local wildlife.</p> <p>No World Heritage sites or designated protected areas are impacted by operations.</p>

		This was confirmed through site observations; interviews with management; and a review of documents including environmental permits, management of change policy, and the mitigation hierarchy factsheet.
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.
23. Community Health and Safety	Fully meets	<p>Stowmarket implements a management system to monitor, avoid, minimize, reduce, and compensate for adverse impacts on community health and safety.</p> <p>Stowmarket 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 risks related to dust, noise pollution, and trespassing as it relates to newly developed housing. Stakeholders may be included as appropriate.</p> <p>Stowmarket further coordinates with the local fire department on the emergency response plan, yearly inspections, and hazmat team drills (suspended during Covid-19).</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 social spending reports, community health needs assessment, and the 5-year workplan for engagement with stakeholders.</p>
24. Community Development	Fully meets	Stowmarket has a process to identify community needs in consultation with affected communities, develop a plan,

		<p>and commit resources to support community development.</p> <p>Stowmarket engages with employees as members of the community to determine where to feed grants and funding to local non-profit organizations.</p> <p>There is an aim to procure locally, and about 13% of annual spend is through local procurement.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of documents including the stakeholder overview, list of donations and charities, North America Local Procurement Strategy, and information on annual spend.</p>
25. Artisanal and Small-Scale Mining	Not applicable	The assessment confirmed there is no ASM in the area of influence.
26. Human Rights	Fully meets	<p>Stowmarket 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>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, training records, the site risk register, and the human rights policy.</p>

27. Security and Human Rights	Not applicable	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 Stowmarket has a system to implement the Voluntary Principles on Security and Human Rights when engaging with private or public security forces.
28. Indigenous Peoples' Rights	Not applicable	The assessment confirmed there are no indigenous peoples in the area of influence.
29. Land Acquisition and Resettlement	Not applicable	The assessment confirmed there is no current or planned involuntary physical or economic displacement of local communities.
30. Cultural Heritage	Fully meets	<p>Stowmarket 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>While Stowmarket is not in an area of archaeological importance, it is noted that if there was substantive land use change/ground works, the site would be required to undergo a preplanning process and identify if this is a risk based on a more recent local act. Further, archaeological evaluation trenching revealed prehistoric features, Roman features, and 12th-14th century pottery in neighboring plot land as the neighboring site is undergoing a large construction project for a new plant/company.</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 change management plan.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	Freeport-McMoRan has comprehensive and established policies, processes, and management frameworks in place, which fully align with the OECD Due

		<p>Diligence Guidelines for Responsible Supply Chains of Minerals for Conflict Affected and High-Risk Areas and the Copper Mark Joint Due Diligence Standard. The corporate team is primarily responsible for carrying out activities related to due diligence in mineral supply chains.</p> <p>Stowmarket is considered downstream of the "identified point", and therefore is not expected to implement the Joint Due Diligence Standard as the standard applies to upstream actors only.</p> <p>This was confirmed through interviews with management; interviews with site-based employees and workers to obtain their level of understanding of the policies and procedures; 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 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.</p>	
	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. At site, personnel receive awareness training on the Responsible Sourcing of Minerals Policy and Due Diligence Program.</p>
	31.b. Red Flag Identification Process	Fully meets	<p>At the corporate level, there is a process to identify CAHRAs, as well as a risk-based compliance review of all suppliers.</p> <p>In the supplier system, each supplier or trader sourced from is listed along with the country of origin, CAHRA designation, review status, date, and column for "path forward" in which it is</p>

			noted whether to continue sourcing with or without conditions, or to cease sourcing.
	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 Stowmarket. 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 Stowmarket'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	<input type="checkbox"/>

site has committed to continuous 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