



Assessment Summary Report

Participant Information

Name of the Site	Mantoverde
Unique identifier provided by the Copper Mark	P0054
Address	Av. Andres Bello 660. Chañaral, Atacama
Country of Operation	Chile
Principle covered products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper concentrate, cathode
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, gold
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, gold
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"/> Error! Bookmark not defined.
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/> Error! Bookmark not defined.
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input type="checkbox"/>
Other (please explain)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>

Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	Desalination plant

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
NA	NA	NA

Independent Site Assessment Information

Name of the Lead Assessor	Rachelle Jackson and Juliana Villegas
Name of the Assessment Firm (if applicable)	Arche Advisors
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	June 12-16, 2023 Follow up assessment criterion 12: November 15, 2023
Assessment Period	May 2022 – May 2023
Summary of the Assessment Methodology	The assessment was conducted using the ISO 19011:2018 methodology against the Copper Mark Criteria for Responsible Production and the Joint Due Diligence Standard. The assessment methodology included data gathering through site visits to the mine operation and community; observation, worker and management interviews, and document review of policies, procedures, and records related to each of the specific Copper Mark criteria. A sampling approach was used related to document selection and worker selection, including contractor agencies. Greater specifics are included in detail in each criteria section of this report. Permanent workers: 800 Contract workers: 1,100
Summary of the Assessment Activities	The assessment consisted of document review and preparation. While on site, the following activities took place: <u>Day 1</u> <ul style="list-style-type: none"> • Opening meeting • Mine tour (pit, storage) • Document review

	<p><u>Day 2</u></p> <ul style="list-style-type: none"> • Community meetings • Desalination Plant tour <p><u>Day 3</u></p> <ul style="list-style-type: none"> • Site tour (operations building, auxiliary processes) • Dormitory tour • Management interviews • Worker interviews • Document review <p><u>Day 4</u></p> <ul style="list-style-type: none"> • Management interviews • Community meeting • Worker interviews • Document review <p><u>Day 5</u></p> <ul style="list-style-type: none"> • Closing meeting
--	--

Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Mantoverde has in place a documented management system that effectively ensures compliance with national legal requirements and with international conventions.</p> <p>Capstone corporate oversees legal compliance of the company. Each site ensures their compliance with legally required licenses and permits. Monthly legal updates are provided through legal subscription services and analysis, as well as through membership with SONAMI.</p>

		<p>This was confirmed through site observation; management interviews and document review including internal audit results, government inspections, and legal audit results, among others.</p>
2. Business Integrity	Fully meets	<p>Mantoverde has in place a documented management system that effectively prevents bribery, corruption, and anti-competitive behavior. Staff are trained on these topics and there is annual public reporting on payments to governments.</p> <p>This was confirmed through site observation; management interviews; worker interviews; and document review including the anti-bribery policy, code of conduct, risk matrix, training records, and sustainability report.</p>
3. Stakeholder Engagement	Fully meets	<p>Mantoverde conducts and documents a stakeholder mapping on a regular basis. Mantoverde also has developed an engagement plan and established a grievance mechanism.</p> <p>This was confirmed through management interviews; worker interviews; stakeholder interviews; and document review including the stakeholder map, grievance procedure, and records of grievances, among others.</p> <p>More information is available here.</p>
4. Business Relationships	Fully meets	<p>Mantoverde has developed a process for identification of significant business partners and subsequently communicates and engages with this group to promote responsible business practices. Language on responsible business practices is included in a code of conduct that suppliers and contractors are required to sign and adhere to. Suppliers and contractors are evaluated based on such criteria; results of such evaluations are taken into consideration to approve them.</p> <p>This was verified through management interviews; and document review, including the code of conduct, supplier</p>

		code of conduct, human rights and corporate affairs policy, due diligence procedure, requirements for contractors, signed supplier agreements, and supplier evaluations, among others.
5. Child Labor	Fully meets	<p>Mantoverde has in place a management system that ensures against the employment of people under the age of 18 years old. No underage persons were observed onsite.</p> <p>Hiring procedures are in place to verify age of applicants; such requirements are communicated and trained to contractors, which are also verified for conformance.</p> <p>This was verified through worker interviews; management interviews; site observation; and document review, including the code of conduct, human rights policy, hiring checklist, communication, and training records, among others.</p>
6. Forced Labor	Fully meets	<p>Mantoverde has in place policies, procedures and practices to prevent the use of forced labor or participation in acts of human trafficking.</p> <p>From the recruitment and hiring process and throughout employment, the site refrains from document retention practices, restricting worker movement and requesting mandatory overtime. Workers are free to end the labor relationship without restrictions, leave the workplace as needed and are paid severance within legal timeframe.</p> <p>This was verified through worker interviews; management interviews; site observation; and document review, including the code of conduct, severance payment records, and the Human Rights policy, among others.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	Mantoverde has in place policies, procedures and practices to ensure they respect employees' rights to

		<p>freedom of association and to collective bargaining.</p> <p>Workers may join or refrain from joining any of the three unions present at the site; they are informed about them during onboarding. Collective agreements are negotiated every three years. Unions report the company bargains in good faith.</p> <p>This was confirmed by interviews with management; worker interviews; union representatives interviews; and a review of documents including the collective bargaining agreements, the company's code of conduct, and training records, among others.</p>
8. Discrimination	Fully meets	<p>Mantoverde has in place policies, procedures and practices to identify and prevent discrimination and harassment against a wide range of protected classes including age, gender, race, national and ethnic origin, religion, language, and sexual orientation, among others.</p> <p>Both internal and external stakeholders confirm awareness on how to report instances of discrimination and harassment; and confirm no discrimination practices are in place.</p> <p>This was confirmed by interviews with management; workers interviewed; external stakeholder interviews and a review of documents including the policy on diversity and inclusion, human rights, code of conduct, and the annual report, among others.</p>
9. Gender Equality	Fully meets	<p>Mantoverde has developed policies and procedures to evaluate gender equality and monitor progress to address gender inequality in the workplace. The company has a program to promote professional and technical education opportunities for women.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the diversity and inclusion policy,</p>

		human rights policy, training records, and sustainability report of the year 2021, among others.
10. Working Hours	Fully meets	<p>Mantoverde has in place policies, procedures and practices to keep employees' regular and overtime working hours within legally required limits and not more than sixty hours in the week.</p> <p>The average hours of this regular work shift are 46 hours per week over a two-week period. Overtime hours is voluntary and infrequent. Working hours, overtime and rest days are in compliance with labor law and clauses of the collective bargaining agreement.</p> <p>This was confirmed by interviews with management; interviews with workers; a review of documents including the code of conduct, shift approval from the local government, collective bargaining agreement, and attendance records, among others.</p>
11. Remuneration	Fully meets	<p>Mantoverde has in place policies, procedures and practices to pay employees wages that exceed national minimum wage and is aligned with the average local industry wage.</p> <p>The company has established a merit-based pay system with job determined salary scales. Salary and benefits are included in the collective bargaining agreement, which renews every three years.</p> <p>Contractor wages are audited as part of monitoring compliance. Wage composition is understood by workers; wages are paid timely, and the company provides wage statements.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; and a review of documents including wage records, code of conduct, collective bargaining agreement, and industry wage study, among others.</p>

<p>12. Occupational Health and Safety</p>	<p>Fully meets</p>	<p>As of the follow up assessment of 15 November 2023 this criterion is fully meets.</p> <p>Mantoverde has developed an internal health and safety management system that is aligned with ISO 45001.</p> <p>This program includes health safety inspections, accident reporting and investigations, hazard assessment and management, emergency preparedness, participation of workers and contractors in workplace health and safety decisions, training of managers and workers, communication to workers of occupational hazards, and allowing workers to remove themselves from dangerous workplace situations.</p> <p>During the site visit, a safe working environment was observed. Workers were using personal protective equipment; adequate risk signage and control measures are posted in each work area. Workers are trained to know the site’s safety rules, policies, standards, and regulations. Workers indicate knowing the procedure for reporting an accident or incident.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; community interviews; a site walkthrough; and a review of documents including the code of conduct, EHSS policy, emergency plan, risk assessment, and accident investigation records, among others.</p> <p>The follow up assessment of 15 November 2023 verified the implementation of the corrective action plan related to infrastructure improvement, adequate storage of chemicals, emergency fire protection system, cleaning of bathrooms with adequate cleaning supplies and office operational in the patio area.</p> <p>This was confirmed through interviews with management; interviews with the</p>
---	--------------------	---

		<p>team in charge of carrying out the implementation of the corrective action plan; a documentary review; and visit to the areas was carried out to verify that the implementation was effective.</p>
13. Grievance Mechanism	Partially meets	<p>Mantoverde has developed and implemented a grievance mechanism that can be accessed via phone, email or face-to-face, and is available for internal and external stakeholders.</p> <p>Grievances are documented; evidence is maintained of grievances reception, investigation, resolution, and communication of resolution. The grievance mechanism appears to be developed in alignment with the UN Guiding Principles Effectiveness Criteria for Non-Judicial Grievance Mechanism; however, the following gap was identified:</p> <ul style="list-style-type: none"> • Insufficient awareness of the existence of the grievance mechanism from direct workers and contractors. <p>This was confirmed by interviews with management; interviews with workers and a review of documents including the integrity policy, grievance procedure, and records of grievances, among others.</p>
14. Environmental Risk Management	Fully meets	<p>Mantoverde has developed and implemented policies and procedures, supported by communications and training regarding environmental risk management. Continuous improvement on environmental risk factors is documented and tracked through objectives and performance evaluations.</p> <p>Mantoverde has identified significant negative and positive environmental impacts of its operations and has established mitigation measures for such impacts. Legal permits are tracked to ensure they are valid and renewed accordingly.</p>

		<p>This was confirmed by interviews with management; interviews with workers; a site walkthrough; and a review of documents including code of conduct, EHSS policy, environmental risk management procedures, training records, and the sustainability report, among others.</p>
15. Greenhouse Gas (GHG) Emissions	Partially meets	<p>Mantoverde has developed an environmental protection policy, quantified greenhouse gas emissions for scope 1 and 2, and has reported on this in its sustainability report for 2021-2022. Mantoverde has developed a strategy for the reduction of 30% GHG emissions between 2025-2030.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> There is not a written procedure to identify emissions, monitor emissions trends and establish short-term reduction targets. <p>The company will increase GHG emissions by 2024 due to the start-up of the concentrator plant and tailings operation.</p> <p>This was confirmed by interviews with management; and a review of documents including GHG protocol, code of conduct, EHSS policy, and the annual total emission sustainability report, among others.</p> <p>More information is available here.</p>
16. Energy Consumption	Partially meets	<p>Mantoverde has included language of its intent to protect natural resources and its proper use, within its code of conduct and EHSS policy. Mantoverde is currently in the process of implementing a management system based on ISO 50001.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> The site has not obtained a certificate of the implementation of its energy management system, which is legally required. The site has engaged a consultant to seek

		<p>to obtain the certificate by March 2024.</p> <ul style="list-style-type: none"> The site has not quantified efficiency or implemented programs to improve efficiency/reduce consumption and increase the use of renewable energies. <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, and sustainability report 2021-2022, among others.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>Mantoverde has a desalination plant. Water is treated for industrial use and human use, meeting the parameters indicated by law for each use.</p> <p>All the water used in the process recirculates. There is no generation of liquid industrial waste, the only waste is the brine that is delivered from the desalination plant to the sea, complying with the parameters indicated by law. Wastewater is treated and used for irrigation of internal roads.</p> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, environmental impact matrix, and the water management system, among others.</p>
<p>18. Waste Management</p>	<p>Fully meets</p>	<p>Mantoverde has developed and implemented policies and procedures to reduce waste generation and to manage waste from generation to disposal. The system in place is committed to the waste hierarchy, prioritizing waste prevention, promoting reuse and recycling of waste.</p> <p>The site has obtained approval by the local authority on its waste management plan and permits for disposal of all types of waste.</p>

		<p>Moreover, Mantoverde has implemented recycling initiatives.</p> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, waste management matrix, and waste management procedures, among others.</p>
19. Tailings Management	Partially meets	<p>Mantoverde does not have operational tailing facilities. A new sulfide plant is under construction along with a new tailing facility to serve its operation, this is planned for 2024.</p> <p>Mantoverde has designed and begun the construction of the tailing in alignment with the Global Industry Standard on Tailings Management.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Since the tailings facility is in the construction stage and is not operational, the standard is not fully implemented. <p>This was confirmed by interviews with management; site walkthrough; and a review of documents including the code of conduct, EHSS policy, tailings policy, and GISTM report progress, among others.</p>
20. Pollution	Fully meets	<p>Mantoverde has implemented a policy that follows the mitigation hierarchy to avoid, minimize, reduce, and compensate for the impact of pollution on human health and the environment.</p> <p>The site demonstrates to implement necessary measures to avoid and minimize the pollution generated by its operations and communicates these actions to internal and external stakeholders. Training for employees has a focus on their role on reducing pollution, while communication for communities covers information about the mitigation plan and potential impacts. The site has developed a</p>

		<p>contingency and emergency plan to deal with incidents and accidents pertaining pollution.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including code of conduct, EHSS policy, and environmental assessment, among others.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>Mantoverde has developed and implemented policies and procedures on biodiversity. Mantoverde's site is not located within a Critical Habitat or World Heritage site.</p> <p>Biodiversity in the area of influence of Mantoverde is not categorized as Endangered Species. The company has assessed its environmental impact, including impact on biodiversity; and has developed a management plan to protect and restore biodiversity. A reporting mechanism is available to all stakeholders to inform of incidents or animal sightings.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, the environmental impact assessment, and the flora and fauna monitoring reports, among others.</p>
22. Mine Closure and Reclamation	Fully meets	<p>Mantoverde has developed a mine closure plan with stakeholder participation; such plan contemplates objectives and goals on maintenance and supervision of the site and its remaining impacts including social, economic, and environmental parameters.</p> <p>Mantoverde has made financial provision for closure related to the cost associated with infrastructure removal, environmental remediation, land restoration and compensation to affected communities.</p>

		<p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including code of conduct, EHSS policy, and resolution approving MV closure plan, among others.</p>
23. Community Health and Safety	Fully meets	<p>Mantoverde has implemented a policy and procedures to evaluate and mitigate significant potential health impacts to communities.</p> <p>Mantoverde proactively engages with the communities closest to the site, though located outside of the impact area of the mining operation. Communities raised concerns on the new tailings facility; Mantoverde responded to their concerns by inviting them to tour the construction site and provide information and responses to their queries.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including Sustainability Report, the Environmental, Social and Health Risk Assessment, Stakeholder Mapping, among others.</p>
24. Community Development	Partially meets	<p>Mantoverde actively engages with community representatives in periodic roundtables to identify projects the company can fund to support community development. The initiatives implemented at the community are centered on education and culture, entrepreneurship, and development of sustainable communities.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • The company has not performed a formal needs assessment with the communities in the area of influence. • There has been no formal monitoring and evaluation carried out to assess the impacts of the

		<p>company's interventions or supported projects.</p> <p>This was confirmed by interviews with management; community interviews; and a review of documents including stakeholder mapping of local communities, minutes of community meetings, social Management plan, among others.</p>
25. Artisanal and Small-Scale Mining	Not applicable	The assessor confirmed that there are no Artisanal and Small-Scale Mining operations in the area of influence of Mantoverde.
26. Human Rights	Fully meets	<p>Mantoverde has implemented the UN Guiding Principles on Business and Human Rights and has in place policies and procedures to uphold their human rights commitment. Mantoverde annually publishes their performance against this commitment.</p> <p>Mantoverde has conducted a human rights risk assessment; results are described on the human rights risk matrix which specifies the risk level of each potential impact. Case studies are available for review on actual risk mitigation actions, aimed at reducing the likelihood of adverse human rights impacts; such actions are confirmed by community interviews. Both internal and external stakeholders report awareness on the human rights policy, how to report violations and how these are remediated.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including the code of conduct, corporate principles, human rights risk assessment, human rights risk matrix, case studies, and the sustainability report, among others.</p>
27. Security and Human Rights	Partially meets	Mantoverde has implemented a Human Rights Policy that covers security practices. This Human Rights Policy commit to identify risks related to human rights security practices, acting

		<p>in alignment with the Voluntary Principles on Security and Human Rights.</p> <p>Training has been provided to contracted security guards by an independent institute based in Chile.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • No risk assessment has been conducted as outlined in the Voluntary Principles on Security and Human Rights (VPSHR). • Training materials for security guards do not cover the VPSHR. <p>This was confirmed by interviews with management; worker interviews; and a review of documents including code of conduct, human rights risk assessment, and the grievance procedure, among others.</p>
28. Indigenous Peoples' Rights	Not applicable	<p>There are no declared indigenous communities in the area of influence of the company.</p> <p>Given the context in which Mantoverde operates, the assessors concluded that implementing site-specific policies and procedures on Indigenous People's Rights is not applicable.</p>
29. Land Acquisition and Resettlement	Not applicable	<p>Given the context in which the Mantoverde company operates, the assessors concluded that implementing site-specific policies and procedures on land acquisition and resettlement is not applicable.</p> <p>The site operation is in a sparsely populated desert-like environment, there has been no affected people by the operation of the company.</p>
30. Cultural Heritage	Fully meets	<p>Mantoverde has implemented a process to manage risks to culture and heritage associated with their activities that is based on consultation with stakeholders.</p> <p>There is a process to evaluate, develop, and implement mitigation</p>

		<p>measures, which includes participation from the community.</p> <p>Where sites with heritage value are identified, measures are taken to rescue, fence, and supervise them. Reports are presented to the relevant authority.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site observation; and a review of documents including the code of conduct, environmental assessment, and the archaeological mapping, among others.</p>
31. Due Diligence in Mineral Supply Chains	Partially meets	<p>Mantoverde has developed a policy and due diligence process to comply with the US FCPA, the UK Modern slavery act and the Chilean Ley 20393, rather than the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • The policy and procedures on due diligence do not include the five-step due diligence process defined in OECD Guidance Annex I; and no mention of the Annex II Risks. <p>This was confirmed by interviews with management; and a review of documents including the code of conduct, requirements for contracted companies, supplier assessments, and due diligence procedure among others.</p>
31.a. Management System	Partially meets	<p>The due diligence process currently in place was established to comply with the US FCPA, the UK Modern Slavery Act, and the Chilean Ley 20393, rather than the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. As such, and because it has not yet incorporated the OECD Due Diligence Guidance, the policy and procedures on due diligence do not include the five-step due diligence process defined in OECD</p>

			<p>Guidance Annex I; and no mention of the Annex II Risks.</p> <p>The site does not accept any external minerals or materials, it does have due diligence processes in place related to contracting service providers and it manages this system and applies it, as noted in Criteria 4.</p>
	31.b. Red Flag Identification Process	Partially meets	There is no procedure to identify conflict-affected and high-risk areas, resulting in no red flag identification process.
	31.c. Risk Assessment Process	Partially meets	While Mantoverde has implemented a risk assessment process, there is no procedure to identify conflict-affected and high-risk areas and therefore complete the red flag identification process.
	31.d. Risk Management Process	Partially meets	While Mantoverde has implemented a risk assessment process, there is no procedure to identify conflict-affected and high-risk areas and therefore complete the red flag identification process.
	31.e. Public Reporting	Partially meets	While Mantoverde reports publicly on ESG, there is no Step 5 report aligned with the OECD framework.
32. Transparency and Disclosure		Fully meets	<p>The parent company Capstone Copper engages in regular public reporting, including through an annual sustainability report using GRI requirements, which includes site-level data of Mantoverde. The company also provides additional information on ESG targets on their website.</p> <p>Capstone Copper Sustainability report can be found here.</p>

Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable	<input type="checkbox"/>

conformance criteria of the Joint Due Diligence Standard.	
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 8 August 2024.	<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 improvement to fully meet all applicable Copper Mark Criteria by 8 August 2024.	<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:	

Award

The Copper Mark	<input checked="" type="checkbox"/>
The Molybdenum Mark	<input 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 Copper Mark is awarded	14 September 2023
Expiry Date of The Copper Mark	13 September 2026