



The Copper Mark Summary Report

Site Information

Name of the Site	BHP Nickel West Pty Ltd
Unique identifier provided by the Copper Mark	S024
Address	Various locations, Western Australia
Country of Operation	Australia
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Nickel briquettes, nickel matte, nickel powder, nickel sulphate, copper-sulphide, cobalt-nickel-sulphide, ammonium-sulphate, sulphuric acid
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Nickel
Metals included in scope (This must be all, or a sub-set of the metals produced on site)	All
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other (<i>please explain</i>)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>
Rails	<input checked="" type="checkbox"/>

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

Independent Site Assessment Information

Name of the Lead Assessor	Meg Fricke
Name of the Assessment Firm (if applicable)	EY
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Site visit: 4 September 2023 Corporate offices visit: 5 September 2023
Assessment Period	1 July 2022 – 30 June 2023
Summary of the Assessment Methodology	<p>EY developed a reasonable assurance methodology specific to the JDDS requirements in accordance with International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information and the Copper Mark Assurance Process. Key assessment activities are outlined below.</p> <p>Nickel West is an integrated nickel enterprise situated in Western Australia, encompassing open-cut and underground mining operations, concentrators, a smelting facility, and a refining operation.</p> <p>The mining activities involve the extraction of low-grade disseminated sulphide ore from the open-pit operation at Mt Keith, as well as the retrieval of high-grade nickel sulphide ore from the Cliffs and Leinster underground mines. The ore is subsequently subjected to processing through two concentrators and dryers at Mt Keith and Leinster. In addition to these operations, Nickel West's concentrator plant in Kambalda also handles ore and concentrate procured from external sources.</p> <p>The convergence point for the three streams of nickel concentrate occurs at the Nickel West Kalgoorlie smelter, where a flash furnace is employed to smelt the concentrate, yielding nickel matte as the final product.</p> <p>Subsequently, Nickel West Kwinana takes the granulated nickel matte produced in the Kalgoorlie smelter and refines it into premium-grade nickel powder and briquettes containing a 99.8 percent nickel purity.</p> <p>To further enhance its product offerings, the nickel powder undergoes additional processing, leading to the production of nickel sulphate at Australia's first nickel sulphate plant, situated alongside the Kwinana Nickel Refinery. Nickel sulphate holds significant importance as a key component in lithium-ion batteries that power electric vehicles.</p>

Summary of the Assessment Activities	<p>The following assessment activities were conducted:</p> <ol style="list-style-type: none"> 1. Assurance Planning and Strategy <ul style="list-style-type: none"> - Opening meeting - Understand the JDDS criteria specific to Nickel West - Development of specific procedures and approach for assurance execution 2. Execution <ul style="list-style-type: none"> - In-person and virtual meetings with functional owners at BHP Group level and at Nickel West were undertaken to understand processes and activities to address the JDDS criteria - Site visit to Nickel West and Kwinana Nickel Refinery site to visually inspect operations, perform inquiries, and sight documents - Checked accuracy of the JDDS Assessment Tool against evidence and observations - Held discussions around rating differences, supporting documentation, gaps and plans to address any gaps 3. Conclusion <ul style="list-style-type: none"> - Executive review and final inspection of JDDS Assessment Tool - Drafting and finalising assurance report, including the Copper Mark verification summary report - Closing meeting
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Summary of Findings

Criteria	Rating	Comments
1. Management System	Fully meets	<p>Nickel West is a BHP asset that has a medium-complexity supply chain and produces metals and minerals from its own mines as well as sourcing externally from non-BHP suppliers (structural feed).</p> <p>Material sourcing is done at a corporate level by the Commercial Sales and Marketing team. BHP has a Group wide Responsible Minerals Policy (Policy), which is publicly available here.</p> <p>BHP has established an OECD-aligned Due Diligence Program (Program) that is appropriate to the nature, scale and operational context of the BHP Group and the Company.</p>

		<p>Resources were appointed to support the implementation of the Policy and Program. Adequate training was provided to relevant employees.</p> <p>BHP senior management assumes responsibility for the implementation, maintenance, and continuous improvements of the Program. In addition, they ensure the Program is integrated into the business processes of the BHP Group and the Company.</p> <p>BHP has EthicsPoint, which is an established and effective grievance mechanism that is appropriate to the nature, scale and operational context of the BHP Group and the Company. EthicsPoint can be accessed here,</p> <p>The information generated by the Program is sufficient for the effective implementation of all applicable steps of the due diligence process.</p> <p>Supplier engagement activities undertaken by BHP are appropriate to support suppliers in building capacity on BHP's policy, its practical application, and to collect and manage information necessary for the implementation of the Program.</p> <p>The above was verified through interviews with management, both at corporate and site levels, and other relevant members of the workforce. We conducted comprehensive examination of various documents such as BHP's Responsible Minerals Policy, BHP's Responsible Minerals Program Due Diligence Procedure, training material, samples of certain suppliers' records and samples of transaction data.</p>
2. Red Flag Identification Process	Fully meets	<p>BHP's Know-Your-Supplier (KYS) Questionnaire - Due Diligence Questions and Supply Chain Mapping templates were consistently and sufficiently implemented to collect, review, and retain supplier and other material information. The information collected is in line with the requirements of the JDDS, and appropriate to the nature, scale, and operational context of BHP Group and the Company.</p> <p>The information collected is sufficient to identify red flags and results are consistent with the Conflict-Affected and High-Risk Areas (CAHRA)</p>

		<p>determination methodology and plausibility assessment.</p> <p>The process to collect, review, and retain information for red flags identification is appropriate to the nature, scale, and operational context of BHP Group and the Company.</p> <p>No red flags were identified.</p> <p>The above was verified through interviews with management, and comprehensive examination of a sample of Nickel West’s structural feed purchases’ various due diligence documents such as Know-Your-Supplier (KYS) Questionnaire - Due Diligence Questions, Supply Chain Mapping and Supplier Red Flag Checklist.</p>
3. Risk Assessment Process	Fully meets	<p>No red flags were identified for Nickel West during the assessment period under Step 2 (Red Flags Identification Process). Details about BHP’s corporate approach to risk assessment is included below.</p> <p>The information collected by BHP is sufficient and reasonable to determine the presence of OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas (OECD Guidance) Annex II risks.</p> <p>Assessment results and the review process are reasonable based on the information collected and the nature, size, location, and circumstances of the BHP Group and the Company.</p> <p>As part of its Responsible Minerals Program, BHP has a credible process to determine the need for on-the-ground assessment. No on-the-ground assessment was deemed necessary with respect to Nickel West and, as such, none has taken place during this assessment period.</p> <p>BHP has an appropriate continuous monitoring process given the nature, scale and circumstances of the BHP Group and Company.</p>
4. Risk Management Process	Fully meets	<p>No red flags were identified for Nickel West during the assessment period under Step 2. Details about BHP’s corporate approach to risk management is included below.</p>

		<p>BHP has a risk mitigation strategy consistent with its Responsible Minerals Policy and the recommendations of the OECD Guidance. In addition, it is appropriate to the type and scale of the risks of adverse impacts and actual adverse impacts and the Company's position along the supply chain.</p> <p>The risk management plan is consistent with the risk management strategy and appropriate to the type and scale of the risks of adverse impacts and actual adverse impacts and the Company's position along the supply chain.</p> <p>The above was verified through interviews with management, and comprehensive examination of various documents such as tools to enable implementation of the risk management tool.</p>
5. Public Reporting	Fully meets	<p>BHP has published its Responsible Minerals Program 2023 report on its supply chain due diligence that is publicly available here.</p> <p>This report covers the requirements of the JDDS standard and includes Nickel West within its scope.</p>

Conclusions

Performance Determination	
The site is found to fully meet the conformance criteria of the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (Joint Due Diligence Standard).	<input checked="" type="checkbox"/>
The site is found to fully meet or partially meet the conformance criteria of the Joint Due Diligence Standard and has committed to continuous improvement at the site to fully meet the conformance criteria by 4 September 2024.	<input type="checkbox"/>
The site is found to miss some or all of the conformance criteria of the Joint Due Diligence Standard, and has committed to continuous improvement at the site to fully meet all conformance criteria by 4 September 2024.	<input type="checkbox"/>
The site misses some or all of the conformance criteria of the Joint Due	<input type="checkbox"/>

Diligence Standard and has not committed to continuous improvement.	
Limitations:	
Additional comments:	

Assurance Process Information

Date of Performance Determination (dd/mm/yyyy)	20 November 2023
Re-assessment Due Date (dd/mm/yyyy)	20 November 2026