



## The Copper Mark Summary Report

### Participant Information

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| Name of the Site  | Minera Spence S.A.  |
| Unique identifier provided by the Copper Mark   | P0013   |
| Address   | Cerro El Plomo 6000   |
| Country of Operation  | Chile   |
| Products produced on site<br>(e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)              | Copper cathode, Copper concentrates   |
| Metals produced on site<br>(e.g., copper, gold, nickel, silver, molybdenum)                                 | Copper, molybdenum, gold, silver  |
| Metals included in scope of Criterion 31<br>(this must be all, or a sub-set of the metals produced on site) | NA  |
| Types of operations included in scope   |   |
| Mining  | <input checked="" type="checkbox"/>   |
| Concentrate blending  | <input checked="" type="checkbox"/>   |
| Solvent extraction and electrowinning   | <input checked="" type="checkbox"/>   |
| Smelting  | <input type="checkbox"/>  |
| Refining  | <input type="checkbox"/>  |
| Other ( <i>please explain</i> )   |   |
| 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> )   | Minera Spence S.A. is located over 1750 meters above sea level in the commune of Sierra Gorda in the Province of Antofagasta, |

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|  | <p>Region of Antofagasta, approximately 50 km southwest of Calama and 150 km to northeast of Antofagasta. This site began operations in December 2006.</p> <p>Spence has four mineral deposit zones: oxidized ore, enriched sulfide ore, mixed mineral and hypogenous sulfide mineral. The mine was designed to extract 50,000 t / d of one or another mineral, oxide or sulfide in different fractions.</p> <p>The process begins with the extraction of the mineral in a conventional open pit. Oxide and sulfide minerals are fed into the primary crushing unit, which requires stockpiling the ore separately. Depending on the type, the ore is sent to a crushing plant in 3 stages (primary, secondary and tertiary).</p> <p>Subsequently, the mineral is fed from a silo by feeders and conveyors to drums where it is conditioned with concentrated sulfuric acid.</p> |
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### Independent Review

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| <p>During this step, the Independent Reviewer examined the Copper Producer’s self-assessment, supporting documentation, independent third-party assurance reports, and publicly available information.</p> <p>The activities included review for completeness, verifying equivalence, and conducting desk-based due diligence.</p> <p>As a result, the Independent Reviewer recommended the scope of the site assessment to the Copper Mark.</p> <p>The Independent Review took place on these dates:</p> | <p>4 May - 29 June 2021</p>   |
| <p>The Independent Reviewer confirmed completeness, indicating available evidence for the assessor to review for all applicable criteria:</p>   | <p>All 32 criteria</p>  |
| <p>The Independent Reviewer recommended the following criteria be included in the scope of the independent site assessment:</p>   | <p>All except:</p> <ul style="list-style-type: none"> <li>• 14. Environmental Management Systems</li> <li>• 16. Energy Consumption</li> <li>• 18. Waste Management</li> </ul> |

|  |  | <ul style="list-style-type: none"> <li>25. Artisanal and Small-Scale Mining</li> </ul>   |
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| <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<br><i>(Name, date of assurance / certification)</i>  | Review Process   | Criteria Covered by Equivalency  |
| ISO 14001:2015<br>18 July 2019   | <p>The Independent Reviewer confirmed the assurance / certification was:</p> <ul style="list-style-type: none"> <li>Valid at the time of the review</li> <li>No more than 24 months old and / or plans for reassessment are underway</li> <li>In effect for an additional 12 months and / or plans for reassessment are underway</li> <li>Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials</li> <li>Accompanied by improvement plans where applicable</li> </ul> | <ul style="list-style-type: none"> <li>14. Environmental Management Systems</li> <li>16. Energy Consumption</li> <li>18. Waste Management</li> </ul> |
| <p>The Independent Reviewer recommended the following criteria be considered focus areas for the independent site assessment:</p>  |  | None   |
| <p>The Independent Reviewer recommended the following criteria be considered not applicable to the Site:</p>   |  | 25. Artisanal and Small-Scale Mining<br>There is no known ASM in the area of influence.  |

### Independent Site Assessment Information

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| Name of the Lead Assessor | Elanne Almeida |
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| Name of the Assessment Firm (if applicable)                | EY Chile<br>EY Australia for assessment against the Joint Due Diligence Standard  |
| Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy) | 11 August – 8 October 2021<br>Site visit: 13 September – 17 September 2021<br>Follow up assessment: 3 October - 31 October 2022<br>Assessment against the Joint Due Diligence Standard: 5-8 September 2023  |
| Assessment Period  | 1 January – 31 December 2020<br>Joint due diligence standard: 1 July 2022 – 30 June 2023  |
| Summary of the Assessment Methodology                      | <p>EY used ISAE 3000 to apply limited assurance to the self-assessment provided by the site. Through site-level testing, document analysis, and interviews, the assessors identified the level of adherence to the 32 Copper Mark Criteria.</p> <p>There are a total of 3,069 workers on site. Of these, 1,514 are employees and 1,555 are contractors.</p> <p>The assessment was carried out through the following:</p> <ul style="list-style-type: none"> <li>• Preparation <ul style="list-style-type: none"> <li>○ Opening meeting</li> <li>○ Assessment of criteria requirements</li> <li>○ Risk assessment in the context of the site</li> <li>○ Development of an assessment plan and focus areas</li> </ul> </li> <li>• Execution <ul style="list-style-type: none"> <li>○ Document review including policies, procedures, data and other relevant evidence</li> <li>○ Virtual meetings with management</li> <li>○ Site visit including central office in Chile of BHP and Spence specifically</li> <li>○ Interviews with workers and local stakeholders</li> <li>○ Comparison of the results of the self-assessment and evidence reviewed</li> <li>○ Discussions on different ratings, gaps, and corrective action plans</li> </ul> </li> <li>• Conclusion <ul style="list-style-type: none"> <li>○ Review of the self-assessment</li> <li>○ Draft report</li> </ul> </li> </ul> |

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|                                      | <ul style="list-style-type: none"> <li>○ Final discussions with BHP / Spence team</li> </ul>   |
| Summary of the Assessment Activities | <ul style="list-style-type: none"> <li>● In-person and virtual interviews (23 management, 3 community / stakeholders, 4 employees / contractors)</li> <li>● Review the accuracy and completeness of the self-assessment</li> <li>● Review the applicability and ratings of the criteria</li> <li>● Inspect the policies and referenced documents for the criteria</li> <li>● Site observations, discussions, document review and interviews</li> <li>● Compare results of the self-assessment with assessor review</li> </ul> <p>EY's assurance statement can be found <a href="#">here</a>.</p> |

### Summary of Findings

| <b>Criterion</b>           | <b>Rating</b><br><i>Fully meets, partially meets, does not meet, not applicable</i> | <b>Comments</b><br><i>Includes link to publicly available documents or supporting evidence where possible and at a minimum for those criteria with an *</i>  |
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| 1. Legal Compliance        | Fully meets   | <p>Spence has a management system in place designed to ensure compliance with relevant legal requirements, managed by the legal team.</p> <p>This is supported by an internal audit on compliance, and a company process (at the corporate level) to review international laws.</p>  |
| 2. Business Integrity      | Fully meets   | <p>Spence has a management system in place designed to prevent bribery, corruption and anti-competitive behavior. Compliance is managed at both the operational and managerial level and supported by internal compliance audits. Workers are aware of the requirements, and there is a corporate-level whistleblower platform available to the public.</p> <p>This was checked through document review, interviews with management and workers.</p> |
| 3. Stakeholder Engagement* | Fully meets   | <p>Spence has a process to identify, map and regularly engage with stakeholders. Issues, concerns and opportunities raised are recorded and used to understand Spence's impact</p>   |

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|   |             | <p>and how social value can be created. A grievance mechanism in line with the UNGP Effectiveness Criteria is understood by external stakeholders and fully implemented and complaints can be raised anonymously through BHP's confidential speak-up tool, EthicsPoint.</p> <p>This was checked through review of the stakeholder map, plan, grievance mechanism, and interviews with management, workers, and a community representative. EthicsPoint can be accessed <a href="#">here</a>.</p> |
| 4. Business Relationships                           | Fully meets | <p>Spence has policies and processes in place designed to select business partners and interact with them based on risk. The site onboards business partners in accordance with BHP's Code of Conduct, among other policies.</p> <p>In addition to document review, this was checked through a supplier and interviews with management.</p>  |
| 5. Child Labor                                      | Fully meets | <p>Spence has a system in place designed to prohibit child labor and avoid exposing young workers to hazardous work.</p> <p>No children were observed on site. The system is supported by a policy, risk analysis and controls.</p>  |
| 6. Forced Labor                                     | Fully meets | <p>Spence has implemented policies and practices in line with human rights standards designed to prevent forced labor.</p> <p>No forced labor was observed on site and interviews with workers indicated that they were not forced to work and relationship with the company was good.</p>   |
| 7. Freedom of Association and Collective Bargaining | Fully meets | <p>Spence has a system designed to ensure freedom of association and collective bargaining. The Code of Conduct is in line with ILO conventions. This was checked</p>  |

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|                                     |             | through interviews with management and a worker representing the union.   |
| 8. Discrimination                   | Fully meets | Spence has a system designed to prevent discrimination. Workers indicated they are trained on the issue and are aware of where to lodge a complaint. Information about anti-discrimination is posted at the site.                               |
| 9. Gender Equality                  | Fully meets | Spence has a system designed to promote gender equality. Workers indicated there are equal opportunities within the workplace. Sexual harassment has been given special attention through dedicated training, posters and complaints mechanism. |
| 10. Working Hours                   | Fully meets | Spence has a system in place designed to manage working hours within legal limits and no greater than 60 hours per week. Overtime is only used to perform exceptional and/or temporary tasks and must be approved by an agreement.              |
| 11. Remuneration                    | Fully meets | Spence has a system in place to pay workers above minimum wage and to meet local industry standards. This was checked through document and record review and interviews.  |
| 12. Occupational Health and Safety  | Fully meets | Spence has a system in place designed to ensure occupational health and safety in line with international standards.<br><br>This was checked through site observations, review of policies and interviews.                                      |
| 13. Grievance Mechanism             | Fully meets | Spence has an accessible grievance mechanism available to all workers that accepts anonymous grievances. Interviews with workers indicated that there are no disincentives to use the grievance mechanism.                                      |
| 14. Environmental Risk Management   | Fully meets | The independent review confirmed Spence has a valid ISO 14001 certificate.  |
| 15. Greenhouse Gas (GHG) Emissions* | Fully meets | Spence has a system designed to manage greenhouse gas emissions, including reduction targets, risk  |

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|  |                 | <p>notification for high energy-use operations, and monitoring over time.</p> <p>This was checked through a review of the policies and procedures, site observations of the system to alert high energy consumption, and interviews with management and stakeholders.</p> <p>Details on BHP’s emission targets and performance can be found in BHP’s Annual Report and on its website, <a href="#">here</a>.</p>  |
| 16. Energy Consumption                     | Fully meets     | The independent review confirmed Spence has a valid ISO 14001 certificate that covers this criterion.   |
| 17. Freshwater Management and Conservation | Fully meets     | <p>Spence has a system in place for freshwater management and conservation.</p> <p>However, there is an opportunity to greater reduce water use, discussed in connection with local communities. The site is currently working on a plan to transition to desalination and other sources of water that will eliminate inland water consumption. The site is also seeking to further engage its supply chain on reducing consumption of inland water.</p> <p>This was checked through a visit to the site’s desalination plant, interviews, and review of policies and procedures.</p> |
| 18. Waste Management                       | Fully meets     | The independent review confirmed Spence has a valid ISO 14001 certificate that covers this criterion.   |
| 19. Tailings Management                    | Partially meets | <p>Spence has a management system in place that is designed to ensure that tailings impoundments are designed, operated, monitored, and closed in line with internationally recognised standards.</p> <p>The rating for the purposes of this question has been assessed against the ICMM Performance Expectations for tailings storage facilities, and the ICMM has issued guidance that</p>  |



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|                                      |             | <p>require operators to report a “partially meets” until the facility is in full conformance with the new Global Industry Standard on Tailings Management (GISTM). BHP is working towards conformance with the GISTM in accordance with the timelines prescribed by the ICMM.</p> <p>As of the follow-up assessment in October 2022, the Copper Mark has granted an extension to fully meet this criterion, given the complexity of meeting the changes required by the GISTM.</p>  |
| 20. Pollution                        | Fully meets | <p>Spence has a system in place designed to minimise, reduce, and address the effects of pollution from its operations.</p> <p>Spence uses a regional baseline study on air, water, and soil, and has mitigation efforts externally verified.</p> <p>This was checked through interviews with management and a worker, document review and site observations.</p>   |
| 21. Biodiversity and Protected Areas | Fully meets | <p>The follow up assessment conducted in October 2022 confirms this criterion is now fully met.</p> <p>At the corporate level, there is a system designed to utilise the mitigation hierarchy to protect biodiversity and protected areas. This includes a policy and management system.</p> <p>This is checked through interviews with management, a worker and the communities, as well as through review of policies and procedures and site observations.</p> <p>During the follow up assessment in October 2022, it was confirmed that the work to formally implement the system at the operational level, including with workers and the community, is implemented.</p> |

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| 22. Mine Closure and Reclamation     | Fully meets    | <p>The follow up assessment conducted in October 2022 confirms this criterion is now fully met.</p> <p>Spence has a documented and published plan for mine closure and reclamation that addresses environmental and social aspects and financial provisions for closure and reclamation of the site / facility are made.</p> <p>During the follow up assessment in October 2022, it was confirmed that Spence has identified relevant stakeholders, engaged with them, and incorporated feedback from that engagement in a revised mine closure plan dated July 2022.</p> |
| 23. Community Health and Safety      | Fully meets    | <p>Spence has a management system in place (based on the mitigation hierarchy) which includes the collection of research, information obtained from stakeholders and concerns and complaints raised, designed to monitor, avoid, minimise, reduce, and compensate for adverse impacts on community health and safety. This is checked through site observations, review of register of complaints and risks, and community interviews.</p>  |
| 24. Community Development            | Fully meets    | <p>Spence has a process to identify community needs and uses this information to inform its social investment plan and budget. The social investment budget is fully expended annually.</p> <p>This is checked through review of documents and studies and interviews with the community.</p>   |
| 25. Artisanal and Small-Scale Mining | Not applicable | <p>There is no ASM in the area of influence.</p>  |
| 26. Human Rights                     | Fully meets    | <p>Aligned with BHP's Human Rights Policy Statement, Spence has a system to implement the UNGPs including human rights due diligence through risk identification, human rights impact assessments, and</p>  |

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|  |                | <p>procedures to protect, respect, and remedy.</p> <p>This is checked through supporting documentation such as communications, as well as through interviews.</p>  |
| 27. Security and Human Rights              | Fully meets    | <p>Spence has a system in place to implement the Voluntary Principles on Security and Human Rights. Security personnel are trained on human rights and understand the policies and procedures.</p> <p>This is checked through review of policies and procedures as well as interviews with management and security personnel.</p>  |
| 28. Indigenous Peoples' Rights             | Not applicable | <p>After on-site review it was determined this criterion is not applicable because there are no Indigenous peoples in the area of influence.</p>   |
| 29. Land Acquisition and Resettlement      | Not applicable | <p>After on-site review it was determined this criterion is not applicable because there has been no land reclamation and / or resettlement.</p>   |
| 30. Cultural Heritage                      | Fully meets    | <p>Spence has a corporate risk management system that integrates the identification and evaluation of cultural heritage. The site is currently in the process of strengthening the system by aligning management processes, definitions and parameters with international standards.</p> <p>This was checked through review of the policies, mapping of cultural heritage, risk identification, and interviews with community members.</p> |
| 31. Due Diligence in Mineral Supply Chains | Fully meets    | <p>Spence is a BHP asset that has a simple supply chain where it had no external structural feed that physically forms part of its products during the assessment period.</p> <p>Material sourcing is done at a corporate level by the Commercial Sales and Marketing team. BHP has a Group-wide Responsible Minerals</p>  |

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|  |  | <p>Policy ('Policy'), which is publicly available <a href="#">here</a>.</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>31.a. Management System</p>               | <p>Fully meets</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 accessible <a href="#">here</a>, that is appropriate to the nature, scale and operational context of the BHP Group and the Company.</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>The above was verified through interviews with management, 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, and training materials.</p> |
|  | <p>31.b. Red Flag Identification Process</p> | <p>Fully meets</p>  | <p>BHP's Know-Your-Supplier ('KYS') Questionnaire - Due Diligence Questions and Supply Chain Mapping templates can be implemented to collect, review, and retain supplier and other material information which are in line with the requirements of the JDDS, and appropriate to the nature,</p>  |

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|  |                                      |                    | <p>scale, and operational context of the BHP Group and the Company.</p> <p>The process to collect, review, and retain information for red flags identification is appropriate to the nature, scale, and operational context of the BHP Group and the Company.</p> <p>BHP’s Conflict-Affected and High-Risk Areas (CAHRA) determination process leverages TDI Sustainability’s published CAHRA list TDI CAHRA   TDi Sustainability (tdi-sustainability.com).</p> <p>Spence did not receive any external feed from third-party suppliers during the assessment period and, as a result, the implementation of the Red Flags Identification Process was not required.</p> <p>The above was verified through interviews with management, and comprehensive examination of BHP Group’s mineral purchases data.</p> |
|  | <p>31.c. Risk Assessment Process</p> | <p>Fully Meets</p> | <p>No red flags were identified for Spence 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 processes are reasonable based on 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</p>                         |

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|                                  |             | <p>necessary with respect to Spence and, as such, none has taken place during this assessment period.</p> <p>BHP has an appropriate continuous monitoring process given nature, scale and circumstances of the BHP Group and the Company.</p>  |
| 31.d. Risk Management Process    | Fully Meets | <p>No red flags were identified for Spence 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> |
| 31.e. Public Reporting*          | Fully Meets | <p>BHP has published its Responsible Minerals Program 2023 report on its supply chain due diligence that is publicly available <a href="#">here</a>.</p> <p>This report covers the requirements of the JDDS and includes Spence within its scope.</p>  |
| 32. Transparency and Disclosure* | Fully meets | <p>Spence has processes in place to report annually on environmental, social and governance performance through BHP Group reporting and via an annual sustainability report in Chile</p>   |

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|  |  | that is publicly available and known by stakeholders. This information is available in BHP’s Annual Report as well as online, <a href="#">here</a> . |
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## Conclusions

| Statement of conformance  |   |
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| 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 checked="" type="checkbox"/> Extension granted for Criterion 19. Tailings Management.  |
| The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 30 October 2022.           | <input 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 30 October 2022. | <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:  | Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would |

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|                      | be required to provide a reasonable level of assurance. |
| Additional comments: |   |

### Copper Mark Award

*This Summary Report is prepared using data from the independent review report and the independent assessment report. The Copper Mark confirms the assessors' conclusion and awards the Copper Mark as follows*

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| Date the Copper Mark is awarded (dd/mm/yyyy) | 2 November 2021 |
| Expiry Date of the Copper Mark (dd/mm/yyyy)  | 1 November 2024 |