

The Copper Mark Summary Report

Site Information

Name of the Site	Hibi Kyodo Smelting Co., Ltd.	
Unique identifier provided by the Copper Mark	S015	
Address	6-1-1 Hibi, Tamano, Okayama	
Country of Operation	Japan	
Products produced on site.	Copper TAMANO-P, E-Cu,	
(e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Sulphuric Acid, Slag	
Metals produced on site.		
(e.g., copper, gold, nickel, silver, molybdenum)	Copper	
Metals included in scope.		
(This must be all, or a sub-set of the metals produced on site)	Copper	
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA	
Types of operations included in scope		
Mining		
Concentrate blending		
Solvent extraction and electrowinning		
Smelting		
Refining		
Other (please explain)		
Infrastructure owned or controlled by the site and included in scope		
Roads		
Rails		



Ports	
Other (please explain)	

Equivalency Check

Upon receiving the pre-assessment checklist, the Copper Mark did a review of equivalent certificates and third-party assurances.

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		Kazuhiko Saito
Name of the Assessment Firm (if applicable)		KPMG AZSA Sustainability Co., Ltd.
Date(s) of Assessment Activities		24 October 2023 (Company headquarters);
(dd/mm/yyyy – dd/mm/yyyy)		31 October 2023 (Hibi)
Assessment Period		1 October 2022 – 30 September 2023
Summary of the Assessment Methodology	The assessment was conducted in accordance with ISO 19011:2018. Assessors first discussed and prepared the JDDS assessment programme for the assessment, which included objectives, risks identified and actions to address them, scope of assessment, assessment period, schedule, criteria, and team members. The assessment procedures mostly consisted of a documentation review prior to site visits to the Company headquarters and Hibi Kyodo Smelting Co., Ltd. ("Hibi"), site visits to the Company headquarters and Hibi, and a review of the Company's 'Step 5 Report'.	
	Hibi is part of Mitsui Mining & Smelting Co., Ltd. ("MMS"). MMS has developed and implements the supply chain due diligence system.	
Summary of the Assessment Activities	Assessment procedures consisted of 1) reviews of documents (e.g. policies and internal procedures) and records (e.g. training records and collected KYC questionnaires) that the Company prepared; 2) interviews of personnel at the Company headquarters and Hibi; 3) a site tour conducted at Hibi to understand where received material is weighed, sampled, accepted and stored as well as the whole production process; and 4) a review of Hibi's Step 5 report from a	

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perspective of whether it met Joint Due Diligence Standard for
Copper, Lead, Nickel and Zinc Version 2 requirements.

Summary of Findings

Criteria	Rating	Comments
1. Management System	Partially meets	Hibi's due diligence system is managed at corporate level by Mitsui Mining & Smelting Co., Ltd ("MMS") and implemented at site.
		Hibi Kyodo Smelting Co., Ltd. (Hibi) sources 91% from mined material and 9% recycled material. Mined material is sourced from multiple international suppliers. Recycled material is sourced from domestic companies.
		MMS has a supply chain policy aligned with the requirements available here .
		The policy is supported by a mineral raw material supply chain due diligence manual, training to relevant employees, and communication to suppliers.
		At the corporate level, the Senior General Manager of the Metals Sector, a Board Director, is appointed as Compliance Officer. The responsibilities and authorities of the Compliance Officer are stipulated in the manual and supported by adequate resources.
		Management annually evaluates the performance of supply chain due diligence and records it. There is an established grievance mechanism to allow any employee or external stakeholder to anonymously raise concerns.
		The following gap was identified:
		 MMS's joint purchasing partners at Hibi have not explicitly required suppliers a commitment to their policies.
		An opportunity for improvement was identified:
		MMS has not incorporated within contracts or agreements with immediate suppliers the requirement for them to provide data required to conduct risk assessments for supply chains where red flags are identified.
		This was confirmed through interviews with management; interviews with personnel; a facility walkthrough; and a review of documents including the policy, manual, grievance mechanism, training records, and records such as results of internal audits.



2. Red Flag Identification Process	Fully meets	MMS has established a process appropriate for collecting the necessary information and identifying potential red flags.
		KYC is conducted on suppliers of mined and recycled material through a KYC questionnaire and third-party sources including supplier websites, the Ministry of Finance's sanctions list, SDN List, UK Consolidated List of Targets, Consolidated List of Persons, Groups and Entities subject to EU Financial Sanctions.
		The person in charge of raw material management at the site visually checks and records the identification of mined material and recycled material at the time of receiving and confirms whether there is any discrepancy between what is received and information on accompanied documents.
		There is a documented process to identify CAHRAs including credible resources to cover governance, conflict, and human rights elements. MMS uses the CAHRAs identification sheet to record the selection criteria and results. This process is consistently applied.
		No red flags were identified during the assessment period.
3. Risk Assessment Process	Not applicable	No red flags were confirmed.
4. Risk Management Process	Not applicable	No red flags were confirmed.
5. Public Reporting	Fully meets	MMS's report for Hibi is consistent with information and evidence obtained at the MMS Head Office and Hibi.
		The report is available here .

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).		
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 2 October 2024.	
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 2 October 2024.	
The site misses some or all of the conformance criteria of the Joint Due Diligence Standard and has not committed to continuous improvement.	
Limitations:	
Additional comments:	
Assurance Process Information	
Date of Performance Determination (dd/mm/yyyy)	30 November 2023
Re-assessment Due Date (dd/mm/yyyy)	29 November 2026