



RESPONSIBLY
PRODUCED
COPPER



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MOLYBDENUM



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NICKEL



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ZINC

Assessment Summary Report

Participant Information

Name of the Site	Denton
Unique identifier provided by the Copper Mark	P0067
Address	2727 Geesling Rd; Denton, TX; 76208
Country of Operation	USA
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper rod; copper wire and cable
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper
Metals included in scope of Criterion 31 (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.)	N/A
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 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 type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	

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
N/A	N/A	N/A

Independent Site Assessment Information

Name of the Lead Assessor	David Shirley and Mark Hardin
Name of the Assessment Firm (if applicable)	Corporate Integrity
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Document review and preparation for site visit: April to May 2023 Site Visit: 19-20 June, 2023
Assessment Period	January – December 2022
Summary of the Assessment Methodology	<p>The assessment was conducted using the International Standard on Assurance ISEA3000 methodology, with a ‘reasonable’ level of assurance, against the Southwire self-assessment claims for level of alignment for each of the Copper Mark requirements – The Criteria Guide for Risk Readiness Assessment Feb 2020; and</p> <p>The assessment methodology included data gathering through the site visit to the facility, observation, employee 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 employee selection.</p> <p>Permanent workers: 357 Contract workers: 0</p>
Summary of the Assessment Activities	<p>The assessment consisted of document review and preparation for the site visit, carried out during the months of April and May 2023. Followed by a visit to the facility, where the following activities took place:</p> <ul style="list-style-type: none"> • Employee interviews • Management interviews

	<ul style="list-style-type: none"> • Site tour • Additional document review • External stakeholder interviews
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Denton has a process to manage legal risk managed at the corporate level through the governance structure that includes top leadership and a committee that oversees the implementation of the ethics and compliance program. Applicable laws are identified at a corporate level and then communicated to each of the sites to ensure implementation with the use of internal platforms to manage legal registry and legal compliance.</p> <p>The legal compliance management system is informed through a management change process that advises the site representatives of relevant changes to corporate policies and procedures.</p> <p>This was confirmed by interviews with management; and a review of documents including the legal compliance summary sheet, Denton compliance audit results, and EH&S policy, among others.</p>
2. Business Integrity	Fully meets	<p>Denton has developed policies and procedures covering anti-money laundering, anti-trust and competition law, conflict of interest, corruption and anti-bribery, and gifts, entertainment, and promotional items. These corporate policies are communicated at site level for current workers on an annual basis, through digital and printed formats, and for new hires as part of the orientation process.</p> <p>This was confirmed by interviews with management; employee interviews; and a review of documents including the ethics and compliance policy, code of</p>

		business conduct, records on political contributions, and training records, among others.
3. Stakeholder Engagement	Fully meets	<p>Denton has carried out a stakeholder mapping exercise based on its sustainability management system and engages with stakeholders in accordance with a plan. These engagements range from bi-monthly to sporadic.</p> <p>A corporate communications strategy has been implemented at the site level to effectively communicate with stakeholders. Denton has developed a grievance mechanism aligned with the UN Guiding Principles' effectiveness criteria for non-judicial grievances.</p> <p>Interviewed stakeholders indicated that they have good relations with the Denton facility, characterizing the company as highly responsive.</p> <p>This was confirmed by interviews with management; employee interviews; external stakeholder interviews and a review of documents including external stakeholder list, grievance procedure, and code of conduct, among others.</p> <p>Visit here to learn more and access the grievance mechanism.</p>
4. Business Relationships	Fully meets	<p>Denton has a third-party compliance risk screening policy to evaluate compliance of vendors, suppliers, customers and joint venture partners. This due diligence process is contracted to a third-party audit firm and overseen by corporate.</p> <p>The screening is based on the content of the supplier code of conduct. Depending on the risk level identified are, there is follow up through supplementary due diligence questionnaires and internal due diligence. If red flags cannot be cleared through mitigation, the business partner is denied. Southwire further contracts a third-party to conduct supplier onsite</p>

		<p>visits for potential vendor companies operating in higher-risk countries.</p> <p>Denton communicates expectations of business partners on legal compliance, ethics, and labor practices, by sharing the supplier code of conduct and by adding language to contract to promote responsible business practices.</p> <p>This was confirmed by interviews with management and a review of documents including the supplier code of conduct, due diligence scope and frequency matrix, screening matrix, among others.</p>
5. Child Labor	Fully meets	<p>Denton has a system in place to prevent the employment of workers under the age of 18 years old.</p> <p>There is one exception for a work-study program where student workers can be younger than 18 years old. These must be assigned to non-hazardous environments. Procedures are in place to verify the age of applicants both workers and student-workers via the request of official documents.</p> <p>Contractors are subject to the same requirements, and is communicated through contracts, relevant policies, and the companies code of conduct (see criterion 4).</p> <p>No underage persons were observed onsite.</p> <p>This was confirmed by interviews with management; site observation; employee interviews; and a review of documents including the company code of conduct, human rights and prevention of human trafficking policy, proof of age of applicants, among others.</p>
6. Forced Labor	Partially meets	<p>Denton has implemented a system to prohibit and prevent forced labor, in alignment with US labor law and corporate policy. Denton has assessed forced labor risks; results indicate contactors are the biggest risk on this</p>

		<p>topic. The company addresses the risk of forced labor of third party contracting by conducting compliance risk screening prior and during business relationships and requires contractors to adhere to company policies; verification of such policies include audits on third party (see criterion 4).</p> <p>Denton's system includes provisions including how to identify human trafficking, implementing fair and transparent employment agreements in the worker's language and freedom to resign without withholding personal documents. Denton site performance on forced labor is subject to the ethics and compliance corporate internal audit.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> Awareness training on forced labor and human trafficking has not been included in basic employee training package for newly hired workers and ongoing training. <p>This was confirmed by interviews with management; employee interviews; site observation; and a review of documents including the company code of conduct, human rights and prevention of human trafficking policy, vendor contract terms, and compliance risk screening, among others.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>Denton respects employees' rights to freedom of association and to collective bargaining in line with ILO Conventions, participate in collective bargaining processes in good faith and not obstruct alternative means of association where there are legal restrictions.</p> <p>The majority of Southwire facilities in the US, including Denton, are not unionized. The company's Employee Handbook commits to meeting and bargaining in good faith with unions at other portfolio</p>

		<p>locations as required by the National Labor Relations Act.</p> <p>Denton employs various methods to maintain workforce connection, including CEO-led 'Town Halls' and 'Round Table' discussions. These aim to mitigate risks associated with unresolved issues and appear effective in allowing employees to raise and resolve issues.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the annual sustainable development report and Employee Handbook.</p>
8. Discrimination	Fully meets	<p>Denton has developed policies and procedures to prevent and address discrimination for protected categories and all types of harassment.</p> <p>The grievance mechanism can be leveraged to report discrimination and harassment instances. In 2022 there was one report on discrimination and one related to employee relations issued through the grievance mechanism which were found to have been investigated and resolved by the company.</p> <p>Training on this topic is provided at hiring and annually, paired with the policy on diversity and inclusion contained in the code of conduct.</p> <p>This was confirmed by interviews with management; employee interviews; site observation; and a review of documents including the code of conduct, employee handbook, investigation policy and procedure, and grievance records, among others.</p>
9. Gender Equality	Fully meets	<p>Denton has implemented a system to assess and continuously improve gender equality indicators.</p> <p>The nondiscrimination policy prohibits gender-based discrimination including through pregnancy, parental leave and</p>

		<p>breastfeeding periods. Procedures and initiatives have been implemented to comply with the US regulations. Denton is an Affirmative Action employer, proactively recruiting female employees, and protections are in place to ensure equal pay among genders.</p> <p>The initiatives on gender equality include the implementation of breastfeeding stations, and the creation of an employee resource group named 'Women's Network' which encourages collaboration and networking among female employees.</p> <p>Denton has appointed a 'team champion' for Diversity and Inclusion, to support initiatives on the matter. Further inclusivity measures include several nursing mothers' stations around the Denton plant site, and paid parental leave.</p> <p>This was confirmed by interviews with management; employee interviews; site observation; and a review of documents including the code of conduct, sustainability report, and training records, among others.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>Denton has implemented a policy on working hours to limit these to 60 hours per week, ensure at least one weekly rest day, and limit hours of work to no more than 13 hours in a 24 hour-period. A new on-site policy features a schedule of four 12-hour workdays, three days off, followed by three more 12-hour workdays, averaging 42 hours per week.</p> <p>Denton has implemented an overtime policy to ensure the voluntary nature of this work. Annual leave is provided in accordance with seniority from 10 to 20 days of pay leave per year.</p> <p>Current policy guidance on working hours at Southwire has been revised as of June of 2023. Under the new policy working hours may not exceed 60 per</p>

		<p>week, nor 13 during a given 24-hour period, and one rest day in seven is required. The Denton site has received and is implementing the new policy, effectively utilizing 4 workdays of 12 hours each, followed by 3 days off, and then another shift of 3 days of 12 hours, averaging 42 hours per week. Employees at the Denton facility was positive about the work schedule, seeing benefits from having 3 consecutive days off.</p> <p>This was confirmed by interviews with management; employee interviews; and a review of documents including the hours of work policy, time records, leave records, among others.</p>
11. Remuneration	Fully meets	<p>Denton pays wages that exceed both the national minimum wage and the locally benchmarked estimates for a 'living wage'.</p> <p>Compensation encompasses salary and benefits including retirement, paid vacation, holiday, medical insurance, and life insurance. Employees have also received a recent 5% Cost of Living increase.</p> <p>This was confirmed by interviews with management; employee interviews; and a review of documents including the employee handbook, benchmark studies for the sector, and payroll records, among others.</p>
12. Occupational Health and Safety	Fully meets	<p>Denton has an environmental, health and safety management system, driven by the corporate office, aligned with OSHA requirements.</p> <p>Occupational health and safety risks are assessed and managed through plans continuously monitored. Denton's system reports to senior management the performance indicators and progress reports towards reducing risk leading to recordable incident and reduction of injury rate. At the corporate level, there is a company-wide goal for Total Reportable Injury</p>

		<p>Rate (TRIR) of 0.8 per 200,000 hours by the year 2023. The target set by the corporate initiative to achieve this portfolio-wide goal is 0.44 for the Denton facility.</p> <p>Key elements of the program include 'Injury Free Environment (IFE)' program in place, under which observations are formally recorded regarding safety matters in their workplace; a "morning huddle," in which daily safety topics are raised; and an extensive training program.</p> <p>An internal audit process is taken by the corporate risk management function. Employees are trained on the policy and procedures continuously through a monthly training schedule and daily meetings as well as other means of communication. Employees at Denton are encouraged to stop a process if potential safety issues are identified.</p> <p>This was confirmed by interviews with management; employee interviews; site observation; and a review of documents including the environmental health and safety policy, sustainability report, risk assessments, performance indicators, and training records, among others.</p>
<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>Denton has implemented a grievance mechanism, managed by the corporate ethics and compliance function, and locally implemented by the human resources department. A 'speak up culture' is promoted; grievances are recorded into the centralized case management system where the incidents are addressed through closure.</p> <p>Two grievances were recorded in 2022 at Denton. Investigation is carried out in alignment with internal process, parties to the process are involved and notified on the outcome. The grievance mechanism is aligned with the UN</p>

		<p>Guiding Principles' effectiveness criteria for non-judicial grievances.</p> <p>This was confirmed by interviews with management; employee interviews; site observation; and a review of documents including the code of business conduct, grievance records and investigations, among others.</p>
14. Environmental Risk Management	Fully meets	<p>Denton has an environmental, health and safety management system, driven by the corporate office, that seeks alignment with ISO 14001. This system aims for compliance of legal requirements and continuous improvement.</p> <p>Environmental risks are assessed, managed, and continuously monitored. Denton has a risk matrix based on likelihood and consequence; the latter including non-compliance, environmental damage and alignment with corporate objectives as key elements.</p> <p>Denton's system reports to senior management the performance indicators and progress towards reducing environmental damage in the aspects of air quality, land, water, natural resources and human health. All effluent discharges from the Denton facility enter the municipal sewage treatment system under permit by local authorities.</p> <p>An internal audit process is taken by the corporate risk management function.</p> <p>This was confirmed by interviews with management; employee interviews; site observation; and a review of documents including the environmental, health and safety policy, sustainability report, risk assessments, performance indicators, and training records, among others.</p>
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>Denton has implemented policies and procedures towards reducing its greenhouse gas emissions, with a goal</p>

		<p>to 100% zero carbon energy goal by 2025 for scopes 1 and 2.</p> <p>Strategies to achieve this include contracting with local power producers for renewable energy credits associated with new solar installations, purchase of carbon offsets and renewable energy certificates. Carbon reduction initiatives are driven by a corporate team.</p> <p>Commitments and progress towards such commitment is included in annual sustainability report. Additionally, Denton has conducted a risk assessment to identify potential climate change impacts on the site operations.</p> <p>This was confirmed by interviews with management; employee interviews; and a review of documents including the GHG emissions summary, sustainability report, and risk assessment, among others.</p> <p>View Southwire’s sustainability disclosures here.</p>
<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>Southwire identifies energy reduction as a key aspect in achieving their goals for carbon reduction, through the elimination of waste and increased end-user efficiency. Energy reduction plans are developed for each site to be implemented over the 2022 – 2023 period.</p> <p>There is a third-party program under corporate instruction to examine power purchase agreements, rate optimization and energy mix (i.e., renewables) for each site.</p> <p>Denton has identified energy efficiency opportunities, implemented energy consumption reduction programs for new projects and current operations, in alignment with the corporate energy reduction program.</p> <p>This was confirmed by interviews with management; and a review of documents including the EHS policy, engineering team audits to identify</p>

		energy efficiency opportunities, among others.
17. Freshwater Management and Conservation	Fully meets	<p>Denton's EHS policy includes a commitment to water management for the minimization of water consumption intensity and the reduction or elimination of wastewater generation. Water management performance falls under corporate operations department. Denton uses municipal sources of water and discharges to the municipal sewage system, monitors and reports to the environmental authority on wastewater pollutants levels.</p> <p>Risks to water identified in the Denton EMS include release of hazardous material to the environment, release of oil to water of sewer structure and release of oil resulting in a sheen on water surface. Management plans for such risks are considered on the environmental management program through protection measures targeted to meet with legal permits. There were no identified risks to other water users or flora/fauna in the site risk assessment.</p> <p>The report encourages continuing the continuous improvement process, given its location in a region affected by chronic drought.</p> <p>This was confirmed by interviews with management; and a review of documents including the sustainability report, wastewater quality test results, among others.</p>
18. Waste Management	Fully meets	<p>Denton's environmental, health and safety management system includes, within its core principles, a commitment to monitor and change processes where feasible, to reduce the volume and toxicity of waste generated, and to manage residual wastes in accordance with regulatory agency-approved methods.</p> <p>Denton has waste designated areas, labeled containers and safety practices</p>

		<p>in place for the management of hazardous waste. Denton has a valid permit as “minor generator” of hazardous waste and uses licensed companies for the transport and disposal of such waste, meeting with regulatory agency approved methods for waste management.</p> <p>This was confirmed by interviews with management; employee interview; site observation; and a review of documents including the EHS policy, hazardous waste permit, and records of disposition of waste, among others.</p>
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	<p>Denton’s environmental, health and safety management system includes, within its core principles, a commitment to minimize pollutant emissions ‘through a variety of control technologies and operational measures’; and further stating that voluntary targets to reduce some emissions beyond regulatory requirements have also been established.</p> <p>Denton has established targets to reduce pollutant emissions beyond regulatory requirements. Pollution is regulated under federal and state programs; the site emissions are regulated under a minor source permit, with volatile organic compounds being primary constituent of concern.</p> <p>This was confirmed by interviews with management; employee interview; site observation; and a review of documents including the EHS policy, list of environmental aspects, among others.</p>
21. Biodiversity and Protected Areas	Not applicable	Denton is located in an industrial development area, with no habitats of significance or protected areas within its area of influence. There is no indication that its operation directly impacts biodiversity, thus this criterion is not applicable.

22. Mine Closure and Reclamation	Not applicable	This criterion is not applicable to non-mining operations.
23. Community Health and Safety	Fully meets	<p>Denton’s EHS policy includes commitments to protecting the public from any impacts of its operation and commits to communicate those to affected parties, as necessary.</p> <p>No potential adverse impacts to local communities were identified through the site’s permitting processes related to air, water and waste-generating activities, and no community health and safety issues have been identified through the EMS risk assessment process.</p> <p>This was confirmed by interviews with management; external stakeholder interviews; and a review of documents including the EHS policy, regulatory and internal risk assessment, among others.</p>
24. Community Development	Fully meets	<p>Denton’s sustainability policy identifies the improvement of the local community, “Giving Back”, as one of its five core tenets. Site staff and corporate staff can submit funding proposals for community projects; a central oversight committee reviews and approves recommendations.</p> <p>The Denton site is located in an economically developed area with high employment and mature public infrastructure, community needs are one-off rather than systemic and are identified through ongoing liaison with external stakeholders.</p> <p>The Denton operations maintains relations with nine organizations associated with philanthropy. Support is offered in monetary, material, and employee volunteer form. Interactions with and donations to these entities are made on annual and semi-annual basis.</p> <p>This was confirmed by interviews with management; employee interview; external stakeholders; and a review of</p>

		documents including the sustainability policy, social metrics dashboard, among others.
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>At corporate level, Southwire has committed to the UN Global Compact, which includes as one of the international frameworks the UN Guiding Principles on Business and Human Rights.</p> <p>The corporate compliance team leads the process to conduct periodic compliance risk and human rights risk assessments, looking at both internal and external risks. Based on the assessments and analysis, various measures are put in place to mitigate risks including contractual requirements and other certifications, compliance risk screenings, third-party led due diligence process, audits, and trainings.</p> <p>This was confirmed by interviews with management; employee interview; and a review of documents including the human rights and prevention of human trafficking policy, third-party compliance risk screening policy, compliance risk matrix, and training records, among others.</p>
27. Security and Human Rights	Not applicable	This criterion is not applicable to non-mining operations.
28. Indigenous Peoples' Rights	Not applicable	There are no documented tribal lands or indigenous populations in the Denton area of influence. Given the context in which the facility operates, the assessment concluded that implementing site-specific policies and procedures on indigenous people's rights is not applicable
29. Land Acquisition and Resettlement	Not applicable	Denton is located in an industrial zone. Given the context in which the facility operates, the assessment concluded that implementing site-specific policies and procedures on land acquisition and resettlement is not applicable.

30. Cultural Heritage	Not applicable	There are no known sites of archaeological significance in the area or cultural heritage impacted by the site operations. The assessment concluded that implementing site-specific policies and procedures on cultural heritage is not applicable.	
31. Due Diligence in Mineral Supply Chains	Partially meets	<p>Denton does not source raw materials directly; these are managed by the corporate office. At the corporate level, Southwire has established a supplier due diligence process that has been updated recently to align with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas. Implementation of the updated due diligence process is in process.</p> <p>This was confirmed through interviews with management; and a review of documents including the responsible minerals sourcing policy and the minerals sourcing red flag and risk assessment procedure.</p>	
	31.a. Management System	Fully meets	At the corporate level, Southwire has established a supplier due diligence process that considers human rights and country risks. This process has been updated recently to align with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas. There is a grievance mechanism in place.
	31.b. Red Flag Identification Process	Partially meets	<p>At the corporate level, Southwire has a process to assess red flag and CAHRA risks. There is a decision-making approach based on the results of the risk assessment that involves an upward escalation of management involvement.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> Implementation of the updated due diligence process is not complete.
	31.c. Risk Assessment Process	Unable to assess	As the results of the red flag identification process are not yet

			<p>complete, this has not been fully assessed.</p> <p>However, no red flags have been identified to date.</p>
	31.d. Risk Management Process	Unable to assess	<p>As the results of the red flag identification process are not yet complete, this has not been fully assessed.</p> <p>However, no red flags have been identified to date.</p>
	31.e. Public Reporting	Partially meets	<p>In the 'Minerals Sourcing Red Flag & Risk Assessment Procedure' Southwire commit to report Due diligence activities publicly in Southwire's annual Sustainability Report and Southwire have stated that the first report will occur in the 2023 report.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> The first report including the information on mineral supply chain due diligence is not yet publicly available.
32. Transparency and Disclosure		Partially meets	<p>The parent company Southwire engages in regular public reporting, including through an annual sustainability report aligned with GRI standards.</p> <p>This annual sustainability report presents on data collected by functional areas at each site and compiled at corporate level. The disclosure subjects include environmental related topics; diversity, inclusion and employment practices, community engagement and partnership; ethics, cybersecurity, and sustainable supply chain; and climate change and zero carbon transition, customer experience, and product quality and safety.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> There is no reference to the Extractives Industries Transparency Initiative (EITI) in policies or reporting, such as a

		<p>statement of support for the EITI.</p> <p>View Southwire’s sustainability disclosures here.</p>
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Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment.	<input type="checkbox"/>
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 01/26/2025.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 01/26/2025.	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment. 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	20 November 2023
Expiry Date of The Copper Mark	19 November 2026