



Assessment Summary Report

Participant Information

Name of the Site	División Andina
Unique identifier provided by the Copper Mark	P0073
Address	Avenida Santa Teresa 513, Los Andes, V region
Country of Operation	Chile
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper concentrate, molybdenum concentrate
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper, molybdenum
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.)	NA
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input 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>)	

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
ISO 14001:2015 Certification valid until: 3 October 2025	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> Valid at the time of the review No more than 24 months old and / or plans for reassessment are underway. In effect for an additional 12 months and / or plans for reassessment are underway Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials Accompanied by improvement plans where applicable 	14. Environmental Risk Management

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)	March – August 2023

	<p>Site visits: 03/08/2023 – 08/08/2023</p> <p>HQ: 10-11, 21 April 2023</p>
<p>Assessment Period</p>	<p>January 2022 – December 2022</p>
<p>Summary of the Assessment Methodology</p>	<p>The assessments were against:</p> <ul style="list-style-type: none"> • The Codelco self-assessment claims for level of alignment for each of the Copper Mark (CM) requirements – <i>The Criteria Guide for Risk Readiness Assessment Feb 2020</i>; and • <i>The Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc Version 2, 1st January 2022</i>. <p>The assurance assessment was conducted in accordance with <i>The Copper Mark Assurance Process V4: 17th October 2022</i>, which requires a ‘reasonable’ level of assurance.</p> <p>The Standard applied to this Engagement was the <i>International Standard on Assurance ISEA3000 (revised) – Assurance Engagements other than Audits & Reviews of Historical Financial Information</i> issued by the International Auditing and Assurance Standards Board (IAASB).</p> <p>Permanent workers: 1509 (male: 1298, female: 211)</p> <p>Contract workers: 2452 (male: 2189, female: 263)</p>
<p>Summary of the Assessment Activities</p>	<p>The ESG governance in Codelco has a clearly defined structure. In this structure, the apex of responsibility rests with the CEO.</p> <p>As a State Operated Enterprise (SOE), Codelco’s constitution, rules, responsibilities, and functions are defined by various Laws and Decrees. There are several Board Committees including a Sustainability Committee. The Corporation’s executives and divisional managers have various sustainability goals included in their 2023 performance agreements factored for safety, environment, and community.</p> <p>There are two management levels that interact on ESG governance at DAND. These are:</p> <ul style="list-style-type: none"> • Corporate Level, which is the highest overarching level. • Divisional (or site) level, which represents the operation itself. <p>Most ESG policies, systems and initiatives are common across all Codelco operations. They are developed, issued, and overseen by central corporate functions. ESG in Chile is highly regulated. As a result, significant management effort is applied to determining compliance requirements and in monitoring compliance.</p> <p>Codelco’s ESG management is guided by a group wide risk management system. All divisions follow this system. The system, which has been in place since 2017, is online, and designed to capture material strategic risks. Inputs are made at divisional level. Each division has a risk committee which oversees various</p>

functional risk evaluations. Determination is made of which risks are material and these are uploaded to the online platform. The overall content of the system is overseen by a corporate risk function within the compliance team. The process has permanent updates, depending on the evolution of the risks.

Risk evaluations are made against likelihood and consequence criteria. The system is currently being graduated from a 7x7 to a 5x5 matrix, which appears more practical to apply. Risks are scored and presented as inherent risks (i.e., assuming no controls) and residual risks (accounting for current controls).

Risks which are uploaded to the platform are subject to bow-tie analyses which assists in identifying key critical controls. Evidence of this application was witnessed at divisional level.

The assessment consisted of document review and preparation. While on site, the following activities took place:

Day 1

- Opening meeting
- Document review

Day 2

- Site tour (tailings dam)
- Community interviews
- Document review

Day 3

- Cultural heritage visit
- Community interviews
- Data processing audit team

Day 4

- Data processing audit team

Day 5

- Site visit (mine operations, concentration)
- Document review

	<p><u>Day 6</u></p> <ul style="list-style-type: none"> • Worker interviews • Community interviews • Document review <p><u>Day 7</u></p> <ul style="list-style-type: none"> • Worker interviews • Union interviews • Document review • Closing meeting
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>División Andina (DAND) implements a management system that ensures compliance with all national legal requirements, including national obligations under international law. Legal compliance is a corporate-led function for all operations in the Codelco portfolio, overseen by a corporate legal counsel. There is a corporate standard to maintain and disseminate the legal framework, and a second process specific to compliance matters, including ESG aspects, corporate governance, ethics, and transparency. This process is subject to third-party certification for alignment with national and international law.</p> <p>A third standard provides steps to take when an infraction appears to be taking place. The counsel is responsible for addressing and tracking all legal issues that arise.</p> <p>The standards are complemented by policies, processes, and implementing procedures.</p> <p>Regulatory changes are communicated on a monthly basis to the site.</p>

		<p>Compliance and permitting obligations have been met at the site level.</p> <p>Although the Corporation was subject to labour protection lawsuits during 2022, these suits were not deemed admissible or were settled out of court, and no convictions against Codelco have been recorded.</p> <p>This was confirmed through interviews with management at corporate, district, and site level; and a review of documents including the regulatory library, suite of procedures, training records, monthly reports, permit dashboard, and registry of inspections.</p>
2. Business Integrity	Fully meets	<p>DAND implements a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behaviour.</p> <p>Business integrity is a corporate function covering all operational divisions. There are policies covering business ethics, conflicts of interest, and the code of conduct. These are supported by implementing instructions and training on Codelco’s “crime prevention model.” Training on this model is provided to managers and supervisors.</p> <p>Codelco is certified under the ISO 37001:2017 Anti-Bribery Management System.</p> <p>No incidents of corruption were reported for 2022.</p> <p>This was confirmed through interviews with management and a review of documents including the business ethics policy, crime prevention manual, code of conduct, training materials, and reports on training on conflicts of interest and anti-corruption.</p>
3. Stakeholder Engagement	Fully meets	<p>DAND has a system to carry out stakeholder mapping, and to implement an engagement plan, and to establish a grievance mechanism.</p>

		<p>There is a corporate sustainability policy that includes reference to community relations and is operationalized under a community relations tools procedure to identify areas of influence, map groups of interest, analyse needs and opportunities, develop community plans, and evaluate community plans in a participatory manner. Other implementing tools include the dialogue tables (“mesas de dialogo”), community conversations, technical visits, and participatory monitoring of outcomes.</p> <p>Codelco has two defined grievance mechanisms: the complaints channel and the socio-environmental grievance and suggestion line. These are in line with the UN Guiding Principles effectiveness criteria. Through these, grievances related to community and environmental issues are captured and recorded and shared with the Community Liaison team. Stakeholders also relay grievance directly to community liaison staff through the dialogue tables, phone, text, and WhatsApp. These are not always captured in the formal grievance process.</p> <p>During interviews, stakeholders expressed that for the most part they believe that Codelco staff listen, are responsive to requests, and provide help, although actions can be slow. In part, the slow actions are thought to be due to staff turnover.</p> <p>This was confirmed through interviews with management and liaison staff; interviews with representatives from community members, dialogue groups, indigenous groups, schools, government, and local suppliers; and a review of documents such as the consultations and grievance folders, procedures for stakeholder mapping, procedure for establishing community grievance mechanisms, results of</p>
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		<p>community relations surveys, and community investment summary.</p> <p>Learn more / access grievance mechanism here.</p>
<p>4. Business Relationships</p>	<p>Fully meets</p>	<p>DAND has a system to promote responsible business practices with significant business partners including suppliers. There is a due diligence KYC process that covers all suppliers and contractors. More detailed risk evaluations and contract management apply to contractors.</p> <p>Codelco has a policy for contractors that addresses the fundamental rights of contractors and guides business relationships. The code of conduct also contains specific language to include contractors in its scope.</p> <p>There is a corporate procedure to rank contractors, which includes criteria on labour relations, female employment, and other areas from the Codelco charter of values. At DAND contractors account for approximately 62% of the workforce. Due diligence, training, performance monitoring, and an evaluation process for contractors is in place. Screening is complemented by a third-party vetting due diligence service. Contractors are bound by Codelco contract terms to respect Codelco’s corporate values and policies. Contractors are subject to Codelco and third-party audits on a regular basis. Suppliers may, and have been, denied onboarding as a result of due diligence relating to financial credibility and the identification of potentially corrupt senior management persons in the supplier company.</p> <p>This was confirmed through interviews with management; and a review of documents including the policy for contractors, sample letters requesting GHG data, standard for bid evaluation,</p>

		evidence of onboarding meetings, and a registry of training of local providers.
5. Child Labor	Fully meets	<p>DAND has a management system that prevents the employment of children under the age of 15, prevents the worst forms of child labour, and prevents the exposure of employees under the age of 18 to hazardous work in line with ILO conventions. The minimum age for employment at Codelco operations is 18 years. Proof of age is required during the recruitment process.</p> <p>No underage persons were observed onsite.</p> <p>This was confirmed through site observations; interviews with management; and a review of documents including guidance on recruitment, example request for national ID card to a job applicant, contracting policy, and the master employee roster.</p>
6. Forced Labor	Partially meets	<p>While this issue is covered under Chilean law, and through reference in the Code of Conduct to United Nations Guiding Principles, and Universal Declaration of Human Rights, Codelco policies are not specific on the company position on forced labour. Employees and contractors are checked for valid documentation before commencing work. Contractors are subject to audits including checks on remuneration.</p> <p>Interviews with workers indicated there was generally limited awareness of the risk of forced labour as defined under the Copper Mark criteria. They also stated they were not aware of any cases of forced labour in Codelco.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • Codelco policies do not have specific language relating to forced labour. • There is insufficient training and awareness of the topic to workers.

		<p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the code of conduct, corporate guidance on recruitment, internal regulations on occupational health and safety, and personnel contracting process at the site level.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>DAND has systems to respect employees' rights to freedom of association and 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>At corporate level, Codelco has references to the right of freedom of association and collective bargaining. 89.1% of the global workforce is unionized under 33 separate collective bargaining agreements (CBAs). Since 2015 (renewed in 2022), there is a foundation agreement between Codelco and the Federation of Copper Workers that promotes the dialogue between company administration and its labour force. Among other principles, it also recognizes the right to collectively bargain.</p> <p>At DAND, there are 4 CBAs. No labour actions were reported for DSAL during 2022.</p> <p>Contractors are not represented by the Codelco unions but are part of individual unions organized within their respective employer organizations.</p> <p>Union leaders described their relationship with Codelco management in terms of 'before' and 'after' the foundation agreement. Prior to the foundation agreement, the relationship was perceived as non-existent. However, since the foundation agreement and with the new presidential administration, it has improved and is now described as "open-door," although "there is still</p>

		<p>some mistrust.” Communication with management and HR include monthly meetings. When issues are taken to management they are described as “responsive but sometimes slow.”</p> <p>Employees stated good relations with their unions and felt well represented.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with representatives from a sampling of unions; and a review of documents including the annual sustainable development report, the foundational agreement, and the CBAs.</p>
<p>8. Discrimination</p>	<p>Partially meets</p>	<p>Diversity, inclusiveness, and intolerance of workplace harassment are embedded in several Codelco policies, commitments, and statements, including the corporate policy on diversity and inclusiveness (2021) and the Code of Conduct.</p> <p>There are training and awareness programs covering discrimination and harassment, directly by Codelco to employees and through contract requirements to contractors.</p> <p>Throughout the Codelco operations, management is implementing a “Cultural Transformation Index” on an annual basis, designed to pick up weak spots and to enable focus areas for improvements. Evidence of this cultural transformation was witnessed, and further demonstrated through consistent feedback that the work culture has improved over recent years, and that discrimination and sexual harassment is not tolerated.</p> <p>In 2022, 3 grievances were attributed to workplace harassment, 0 to sexual harassment and 0 to discrimination.</p> <p>Interviews with workers confirmed a strong awareness of the company position on discrimination and harassment that has strengthened with the change in culture.</p>

		<p>Awareness of the specific Codelco requirements is variable amongst the contract workforce, although most were aware that discrimination and harassment are not acceptable in the working environment.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> • Insufficient evidence of related training in the contracted workforce. <p>This was confirmed through interviews with management; interviews with workers; interviews with community members; and a review of documents including corporate policy on diversity and inclusiveness (2021); training materials and records; recruitment and promotion procedures; and action plan for attaining Diversity and Inclusion policy objectives.</p>
<p>9. Gender Equality</p>	<p>Fully meets</p>	<p>DAND has a system to continually assess and monitor progress to ensure the implementation of a policy on gender equality in the workplace.</p> <p>At corporate level, Codelco's commitments to gender equality are made in the corporate sustainability policy, the corporate policy on diversity and inclusion, code of conduct, guidelines on the prevention of harassment, and measures incorporated into site internal regulations. There is a corporate Head of Diversity and Inclusion.</p> <p>Gender equity within Codelco requires leadership initiatives, training, action plans, results monitoring and incorporation of diversity into all personnel processes. There is a company-wide goal of attaining 35% female participation among direct employees by 2027 (currently at about 14%). At DAND, female workers make up 16% of employed and 12% of contracted workers.</p> <p>An internal study identifies the recruitment and remuneration of women compared to men. The study</p>

		<p>acknowledges a disparity in senior executive ranks, where women's average hourly pay was reported in 2021 as between 78% and 80% of their male colleagues respectively This disparity is recognized in the company's Gender Parity program, which has established quarterly targets to reduce this gap across all operations. The workforce-wide figures for direct employees reported in the 2022 Memoria show that across all categories women have a slightly higher compensation rate of 7% above that of their male colleagues. Disaggregated data shows that disparities persisted in 2022 in the 'senior executive' (vice-president) and 'management' ranks, though the gap has been closed in 'leadership' ranks.</p> <p>There is an annual plan that drives actions aimed at achieving policy objectives, identifying training and communication initiatives. Program initiatives from this annual plan that were witnessed include apprenticeships to increase female participation in the workforce, increase promotion through the ranks, address pay disparities, promote cultural transformation (including diversity and inclusion), and advance prevention and referral of (domestic) situations of violence against women.</p> <p>DAND has set up a women's group which meets regularly and has a range of initiatives including – PPE designed for women, a mentoring program, women safety walks abouts, an internship program, talks on different topics (sexual and gender diversity, disability, egalitarian masculinities etc.). This group includes both employee and contract workers.</p> <p>Interviewed female workers are aware of the commitments and stated they are</p>
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		<p>comfortable in the workplace and treated equally.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the annual plan; dashboard and indicators; Principles and Directives on Gender Diversity; goals and metrics.</p>
10. Working Hours	Fully meets	<p>DAND has a system to keep employees' total regular and overtime working hours to 60 hours per week unless defined otherwise by applicable law or a collective bargaining agreement, and to ensure overtime is voluntary, provide one rest day in seven, and provide annual leave.</p> <p>Working hours are included within the CBAs and includes 25 vacation days, which is 10 days more than required by law.</p> <p>All workforce members work to one of two shift patterns based on 12-hour days; 4 days on followed by 4 days off or 4 days on followed by 3 days off (this works out at an average weekly of 42 or 45hrs). This schedule applies to all contractors. Overtime is unusual, is voluntary and occurs with prior authorization.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the corporate sustainability policy commitments, quality of life policy, government service order approving DAND request for 'exceptional' system for working days at DAND, and internal regulations on occupational health and safety.</p>
11. Remuneration	Fully meets	<p>DAND has a system to pay wages that equal or exceed the national minimum wage, the appropriate industry wage (if higher), or a living wage.</p> <p>Pay scales are agreed as part of the CBAs. Using the Global Grading system, which considers market</p>

		<p>comparisons and weighting factors based on work type and experience, there is an annual analysis of all employee salary and benefits package to inform the collective bargaining process. There is also an annual comparison undertaken by a third-party consultant on 50 large Chilean companies' remuneration packages. Codelco is in the 50th percentile, which is above minimum wage. It is noted that as a state-owned enterprise Codelco is not allowed to pay the highest wage.</p> <p>Contractor remuneration packages are not set by Codelco but are required to be paid according to law and subject to a Codelco audit.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including collective bargaining agreements, the contracting policy, and the corporate standard on negotiating collective agreements.</p>
<p>12. Occupational Health and Safety</p>	<p>Fully meets</p>	<p>There is a clearly defined management system for safety, occupational health and safety and operational risks (SIGO) which is defined at the corporate level and implemented at each site. Codelco has ISO45001 certification but the physical site visit at DAND has not yet been completed. For this reason, the ISO45001 was not considered equivalent, and this criterion was fully assessed.</p> <p>The system involves policy and structure, fatality standards, occupational health standards, and risk evaluation and matrix with associated operational controls. Organization and structure are defined together with all responsibilities for different levels in the workforce, overseen by a committee specifically covering occupational health and safety (OHS).</p> <p>DAND has an OHS manager and follows the corporate risk assessment requirements. The risk assessment is</p>

		<p>updated annually and includes an analysis to confirm/identify critical control for main safety and health risks. There is also a critical control verification process in place, with supervisors responsible to undertake verifications.</p> <p>Other elements of the system include weekly safety management talks, compliance audits against the Codelco system, “stop work” policies, a process to investigate and identify root causes of accidents, health screening, training, and safety signage.</p> <p>PPE meets national standards. While contractors may provide their own PPE, it must comply with Codelco requirements for the task, which is checked by the supervisor and worker before that task. Interviews with contractors confirmed that they were issued with appropriate PPE. Some contract employees did state that PPE issued through their company could be of lower quality, impacting comfort and durability, but that the safety standards were the same as for Codelco employees. The OHS systems are enforced for both direct employees and contractors. Silicosis is a key risk issue at DAND and there are both current and historical cases on record. While incident rates have reduced in recent years, there continue to be new cases identified with a total of 26 cases currently active. DAND has in place specific procedures and controls aimed at reducing the risks. These include Controls at source, risk mapping, provision of PPE, personal monitors, and medical screening.</p> <p>This was confirmed through interviews with management; interviews with workers; site observations; and a review of documents including the corporate standards on workplace health, corporate policy on safety, workplace health and occupational risk, the incident management system</p>
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		output, ISO 45001 audit reports, internal compliance audit results, and the permit to work forms on which proper PPE is verified.
13. Grievance Mechanism	Fully meets	<p>DAND has a grievance mechanism accessible to all employees. The policy and process to manage complaints is managed at corporate level and through a third-party system. Employees and contractors have access to the system and resolution process.</p> <p>Quarterly reports on incidents are tracked and include information such as complaints per site as well as status and outcome. DAND received 42 complaints in 2022 including policy violations, workplace harassment, unsafe working conditions, and corruption.</p> <p>Workers are aware of the formal grievance system, though state they would raise a complaint with immediate supervisors as a first line of reporting.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the procedure for the grievance and suggestion line for socio-environmental matters, grievance statistics, and sample grievances.</p>
14. Environmental Risk Management	Fully meets	<p>A full ISO14001 certification audit of DAND was conducted between July and August 2022 and the site has a valid ISO14001 certificate until October 2025.</p> <p>As a result, the assessment confirmed that the site meets the requirement as validated through ISO 14001 certification.</p>
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>DAND has a system to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting protocols (Carbon Disclosure Project, or CDP).</p>

		<p>Scope 1 and 2 emissions are calculated for each operation including DAND using methodology consistent with the Carbon Disclosure Project (CDP). Emission and carbon intensity figures are reported publicly in the sustainability report and are third-party verified.</p> <p>Codelco has a corporate strategy with an objective of reaching net zero for scopes 1 and 2 by 2050. There is a 2030 interim target reduction of 70% against a baseline of 2019 levels, intended to be achieved through conversion of scope 2 emissions through purchasing agreements for certified renewable energy and through electrification.</p> <p>DAND accounts for approximately 8.4% of Codelco direct energy consumption, and approximately 8.2% of indirect energy consumption. They have a decarbonisation plan and there is a site-level climate change and energy plan reflecting corporate objectives.</p> <p>This was confirmed through interviews with management; and a review of documents including the sustainable policy commitments, indirect and direct emissions spreadsheet, and environmental IMS procedure.</p> <p>More information is available here.</p>
16. Energy Consumption	Fully meets	<p>DAND has a system to implement and quantify energy efficiency improvements and increased. Use of renewable energy to reduce total energy consumption and/or energy intensity.</p> <p>Energy consumption and energy efficiency are quantified and reported in the sustainability section of the annual report.</p> <p>DAND have reviewed energy efficiency and conversion projects that have been prioritized in a plan aimed at meeting corporate objectives, including conversions to LED lighting, and</p>

		<p>installation of a 'regenerative' conveyer belt in the underground operation. There is an energy efficiency target of 2% improvement over 2019 baseline by 2027. DAND is planning to be ISO 50001 certified by March 2024.</p> <p>This was confirmed through interviews with management; and a review of documents including the energy efficiency plan, notice on agreement to buy 100% renewable energy, and a status report on energy efficiency initiatives at DAND.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>DAND has a system to conduct a comprehensive assessment of water-use impacts and risks in collaboration with relevant stakeholders and to implement measures to ensure that water consumption does not restrict availability/access for other water users or reduce the range and populations of fauna and flora in the catchment area of the site / facility.</p> <p>At corporate level, there is a commitment to seek greater efficiency and reduction of impacts to freshwater resources, primarily by reducing consumption of land-based water sources through process efficiency, reliance on recovered tailings water, and desalination of ocean water. These measures are targeted to reduce consumption of "continental" water by 60% by the year 2030.</p> <p>DAND goals include a 15% reduction in freshwater use through operational efficiencies, and an 18% reduction by increased use of water recovered from discontinued tailings impoundments. By 2030, an aggregate investment of ~US\$1,325M is scheduled to be allocated to projects aimed at achieving these goals. These projects include improvements to wellfield efficiencies, modifications to tailings thickeners, and completion of a water recirculation system.</p>

		<p>Water management systems are in place to control, divert and treat water polluted by DAND operations. Water discharge management is covered by the ISO14001 certification.</p> <p>This was confirmed through interviews with management; and a review of documents including commitments of Codelco sustainability policy, status of sustainability goals 2022: water use, and audit report from national water authority internal audit report on implementation of corporate water strategy.</p>
18. Waste Management	Fully meets	<p>DAND implements a risk-based waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (hazardous, non-hazardous, and inert), and has been operational since the introduction of ISO14001 principles.</p> <p>There is a circular economy-based target in the 2030 strategy to reduce industrial waste by 65% based on 2019 levels and are in the process of acquiring third party assistance to achieve these goals.</p> <p>Waste management and disposal is subject to regulations and management of these regulations comes under ISO14001.</p> <p>This was confirmed through site observations; interviews with management; and a review of documents including good practices in valorising wastes, minutes from landfill audits, reports from the hazardous waste landfill, and the procedure to manage industrial solid wastes.</p>
19. Tailings Management	Fully meets	<p>On 1st October 2021, the Copper Mark adopted the Interim Guidance on Tailings Management. All participants who joined the Copper Mark after this date are required to implement the Global Industry Standard for Tailings Management (GISTM) for existing and new tailings facilities at their site to</p>

		<p>achieve a “fully meets” rating for this criterion.</p> <p>DAND has implemented the Global Industry Standard for Tailings Management, including completing the self-assessment and publishing a disclosure.</p> <p>The DAND tailings management system incorporates three tailings storage facilities, the main one being the Overjeria facility. The Los Leones dam is an emergency dam used typically 2 weeks per year. The Piuquenes dam is being shut down and decommissioned with the tailings being transferred to the Overjeria facility.</p> <p>Codelco has an established governance framework for tailings management and a documented Tailings Management System driven by a central corporate tailings team aligned with the Global Industry Standard for Tailings Management (GISTM). This governance includes third party oversight with an appointed Engineer of Record and an Independent Tailings Review Board (ITRB). There is a reporting line direct to the CEO and Board for both internal tailings related functions and the third-party oversight entities.</p> <p>DAND has conducted risk evaluations on the tailings facilities, including credible failure analyses using Failure Modes and Effects Analysis methodology. In accordance with GISTM risk criteria the tailings facilities are rated as ‘extreme.’ In addition to a dam failure two other risks were identified by the Codelco risk evaluation: a tailings channel failure and ground water contamination. Bow-tie analyses have been conducted for all these risks which has helped in identifying critical controls.</p> <p>There is an emergency plan that has been co-ordinated with public emergency authorities and with Anglo</p>
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		<p>American regarding their Los Tortolas tailings. Codelco has initiated engagement of potentially affected communities regarding informing of tailings issues and involvement in emergency response planning and testing.</p> <p>In accordance with GISTM requirements, DAND has completed a self-assessment and issued a disclosure for the Overjeria facility, available here.</p> <p>This was confirmed through interviews with management; interviews with members of the site's tailing's team; interviews with community members; and a review of corporate and site level documents including the corporate tailings management system, the corporate standard on geotechnology applied to tailings impoundments, internal evaluation memo (2022) on GISTM implementation, the GISTM self-assessment, consultant report on Background review of Overjeria TSF, monitoring report from external consultant, failure mode study, simulation records, emergency response plan records.</p>
20. Pollution	Fully meets	<p>DAND implements the mitigation hierarchy to avoid, minimize, reduce, and compensate for the adverse impacts of pollution on human health and the environment. The mitigation hierarchy is particularly prominent during the environmental impact assessment when pollution impacts are first quantified.</p> <p>At the corporate level, there is a policy commitment to prepare emissions inventories and dispersion models, maintain permanent monitoring processes, develop solutions to continually reduce emissions sources, and report results to relevant authorities and communities.</p> <p>Particulate matter levels and meteorological conditions are officially</p>

		<p>monitored at four community locations, with results being updated every three days. These are available publicly and results are also posted at various community locations. There are also 10 operational monitoring stations with automatic readings every 10mins used to identify short term issues. A report on the monitoring of dust levels on nearby glaciers is completed annually.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; site observation; and a review of documents including the methodology for emission calculations, EMS system incident report, reports on air quality monitoring, and sustainability goals 2030.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Fully meets</p>	<p>DAND implements the mitigation hierarchy to avoid, minimize, reduce, and compensate for adverse impacts on biodiversity; to avoid adverse impacts to Critical Habitats or Endangered Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless specifically and legally permitted.</p> <p>At corporate level Codelco commits to conservation of biodiversity including to apply the mitigation hierarchy.</p> <p>The surroundings of DAND are rich in biodiversity and there is a Flora and Fauna protection plan which targets 15 species of fauna and 16 species of flora. Codelco have strategic alliances with CEREFAN (Centro de Rehabilitacion de Fauna Andina) and SAG (Servicio Agrícola y Ganadero). Additionally, there is a forestation programme to replace trees in the area of the Ovejeria Tailings.</p> <p>Training and awareness programmes are provided for both workers and contractors.</p> <p>This was confirmed by interviews with management; and a review of</p>

		documents including reports on results of seasonal monitoring, capture and relocation programs, biodiversity reporting formats, ESIA baseline studies, permits, and commitments registers.
22. Mine Closure and Reclamation	Fully meets	<p>DAND has a documented plan with stakeholder inputs that addresses environmental and social aspects and makes financial provisions for closure and reclamation of the site / facility.</p> <p>Mine closures are overseen by a corporate Mine Closure Director using a defined governance structure and subject to Chilean mine closure law and ICMM guidance on closure. The closure plans have been approved by the government.</p> <p>Elements of the closure plan include financial provisions, internal audit programs, social aspects, and physical aspects.</p> <p>DAND are not currently within a statutory period which legally obligates them to disclose mine closure information publicly, therefore, public engagement around closure has not been initiated.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; and a review of documents including the resolution approving the closure plan, program for diffusion, and the corporate closure standard.</p>
23. Community Health and Safety	Fully meets	<p>DAND implement a management system to monitor, avoid, minimize, reduce, and compensate for adverse impacts on community health and safety.</p> <p>DAND mining operations are at high altitude and remote from communities at lower altitudes. Community related risks identified in the risk evaluation and EIA include air quality, water quality,</p>

		<p>water resource and potential incidents on the rail line.</p> <p>Both regulatory and community participatory water and air quality monitoring are conducted at DAND.</p> <p>Community-related risks identified include road safety issues and unsafe footbridges, for which Codelco has implemented mitigation solutions.</p> <p>This was confirmed through interviews with management; interviews with representatives from stakeholder groups; and a review of documents including the SOP between related parties, air quality reports, among others.</p>
<p>24. Community Development</p>	<p>Fully meets</p>	<p>DAND has a process to identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development.</p> <p>At corporate level, there is a commitment to social value being created and contributing to local social, economic, and institutional development.</p> <p>Policies operationalized under a corporate 'Community Relations Tools' provide guidance on identifying, designing, executing, and evaluating projects that reach communities within the area of influence of DAND.</p> <p>In 2022, Codelco community investments were made through 170 community agreements, of which nearly 40% was characterized as 'voluntary'. The latter term means that the investments were made above and beyond statutory obligations, such as those contained in ESIA resolutions of approval.</p> <p>Projects include integration into the Codelco value chain by capacity building in the local educational system, providing local community infrastructure and facilitating access to potable water.</p>

		<p>Overall feedback indicated that community investment projects well received and appreciated. This was confirmed through interviews with management; interviews with stakeholders from the community; and a review of documents including the procedure for community investments, the registry of community projects, community agreements, and the map of the stakeholder region.</p>
25. Artisanal and Small-Scale Mining	Fully meets	<p>DAND engage with artisanal and small-scale miners (ASM) and facilitate their formalization and improvement of their environmental and social practices, where there are known to be legitimate ASM in the sphere of influence of the site / facility.</p> <p>There are two small-scale mining operations in the area of influence of DAND operations. Codelco provide support and training to both operations mainly on health and safety and the provision of PPE, as well as providing help to maintain legal licenses when needed.</p> <p>In Chile, the government-run ENAMI is the entity responsible for direct engagement with ASM and undertakes capacity building. As such, all ASM mines in Chile must be legal and registered. Codelco does checks on this for all ENAMI ASMs that are in its minerals supply chain.</p> <p>This was confirmed through interviews with management and a review of documents including evidence of support and training to ENAMI mines in area, the corporate sustainability policy, and mine ownership granted to artisanal miners for formalization document.</p>
26. Human Rights	Partially meets	<p>Codelco has a human rights policy included in the sustainability policy that commits to implementing the UN Guiding Principles on Business and Human Rights, evaluating and managing human rights risks, applying</p>

		<p>the OECD Due Diligence Guidance, and maintaining a grievance system.</p> <p>While there is no specific human rights position at the division level, management and control of human rights issues related to specific topics, for example in human resources is implemented at functional level.</p> <p>An independent Human Rights Due Diligence (HRDD) assessment was conducted at DAND in 2021. The evaluation utilises the Codelco risk assessment and matrix as a basis with some added consequence criteria relating to Human Rights.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • There is insufficient evidence to demonstrate that an improvement program based on the findings of the HRDD assessment is being implemented. • There is insufficient evidence to demonstrate that risks identified in the HRDD assessment have been incorporated into the risk management framework, confirming that a systematic effort to address the findings is not yet in place. <p>This was confirmed through interviews with management; and a review of documents including the due diligence report, registry of training, and the corporate sustainability policy.</p>
<p>27. Security and Human Rights</p>	<p>Fully meets</p>	<p>The Codelco corporate sustainability policy pledges to respect human rights. There are two tiers of private security throughout Codelco operations: unarmed guards and armed enforcement.</p> <p>There are technical specifications on guarding and protection, including guidelines on apprehension and detainment. There is training to security on human rights, including Voluntary</p>

		<p>Principles on Security and Human Rights (VPSHR) training.</p> <p>Other safeguards in place include accreditation requirements around physical and psychological status and background checks.</p> <p>This was confirmed through interviews with management; interviews with a member of the security force; and a review of documents including the training for security, decree on private security, organization manual for private security, accreditation guidelines, and the human rights due diligence report.</p>
28. Indigenous Peoples' Rights	Not applicable	<p>The assessment confirmed, using information from a national survey of indigenous peoples and stakeholder mapping, that there are no indigenous associations in the DAND area of influence.</p>
29. Land Acquisition and Resettlement	Not applicable	<p>The assessment confirmed that there are no forecasts, development plans, exploration or other activities that would entail acquisition of land beyond existing mine property boundaries, and that there is no human habitation or use of lands within existing mining boundaries, legal or otherwise, that will be impacted by company operations.</p>
30. Cultural Heritage	Fully meets	<p>DAND has a system to identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage.</p> <p>There is a policy to minimize impacts to cultural heritage and a corresponding procedure directed at operational incidents with "environmental consequences" including archaeological, paleontological, historic, or any other type of cultural heritage. Preventative measures around cultural heritage are also government by national legislation guiding assessment,</p>

		<p>mitigation, management of potential impacts during early stages of a project.</p> <p>DAND has invested in the support of local culture, including renovation of artwork in public spaces, support for the local youth symphony orchestra, a book on the archaeological heritage of the Aconcagua valley, and scientific publications on the Piuquenes cave.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; site observation to the cultural heritage site; and a review of documents including the corporate standard on community management, reports on archaeological investigations and findings, and an analysis on risk of impact to cultural resources.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>Codelco has implemented a due diligence system aligned with the OECD framework applicable to all sites.</p> <p>Currently no upstream minerals are processed through DAND.</p>
31.a. Management System	Fully meets	<p>Codelco at the corporate level has a policy underpinned by executive support.</p> <p>A governance structure has been established with defined responsibilities from a corporate team down to each division. This includes a Responsible Sourcing Due Diligence Committee which provides oversight. The Director of Commercial Operations, compliance officer, and strategy and marketing teams report to the Responsible Sourcing Due Diligence Committee on related topics.</p> <p>The committee meets at least annually and whenever a red flag is identified in the due diligence process.</p> <p>This is complemented by adequate resources, senior level responsibility, training to relevant personnel, data management, and supplier engagement.</p>

	31.b. Red Flag Identification Process	Fully meets	<p>Policies and procedures are in place for both mineral supply chain and company know-your-counterparty due diligence processes.</p> <p>Codelco has a CAHRA determination process and documentation to identify conflict-affected and high-risk areas, in which Chile is not considered a CAHRA.</p> <p>No red flags were identified.</p>
	31.c. Risk Assessment Process	Not applicable	Because there were no confirmed red flags, this criterion is not applicable.
	31.d. Risk Management Process	Not applicable	Because there were no confirmed red flags, this criterion is not applicable.
	31.e. Public Reporting	Fully meets	<p>Codelco has a Step 5 report that reflects the evidence reviewed during the assessment and includes site-level information. The report is available here.</p>
32. Transparency and Disclosure		Partially meets	<p>The primary instrument for disclosure of performance for Codelco is their annual 'Memoria 2022' document, which is an integrated report on financial, production and sustainability matters for the public. It has been third-party assured in accordance with GRI.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> The verified report has not been made public.

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 conformance criteria of the Joint Due Diligence Standard.	<input type="checkbox"/>
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	<input checked="" type="checkbox"/>

to fully meet all applicable Copper Mark Criteria by 21/02/2025.	
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 21/02/2025.	<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 checked="" 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 and The Molybdenum are awarded	28 November 2023
Expiry Date of The Copper Mark and The Molybdenum Mark	27 November 2026