



## Assessment Summary Report

### Participant Information

Name of the Site	El Paso
Unique identifier provided by the Copper Mark	P0008
Address	897 Hawkins Blvd El Paso, TX
Country of Operation	United States of America
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathodes, cast copper rod
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper, nickel
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, nickel
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
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 checked="" type="checkbox"/>
Fabrication	<input checked="" type="checkbox"/>
Other ( <i>please explain</i> )	Rod Mill
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> )	

### 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 Valid until 15 Dec 2026	The assurance / certification was confirmed to be: <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>	14. Environmental Risk Management
ISO 45001:2018 Valid until 29 Jan 2026	The assurance / certification was confirmed to be: <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> </ul>	12. Occupational Health and Safety

	<ul style="list-style-type: none"> <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>	
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### Independent Site Assessment Information

Name of the Lead Assessor	Chip Johnson
Name of the Assessment Firm (if applicable)	Ernst & Young (EY)
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	On-site assessment: 17-19 October 2023
Assessment Period	1 March 2021 – 20 October 2023
Summary of the Assessment Methodology	<p>The assessors employed AICPA AT-C 205 and ISAE 3000 methodologies. The assessment consisted of a site visit to the El Paso facility, interviews with employees, contractors, management and stakeholders, site walkthrough and documentation review. Pre-assessment activities included a review of the Copper Mark self-assessment report.</p> <p>The assessment was carried out using the ICMM performance expectations, and where relevant, the additional Copper Mark Top-off requirements and complementary information sourced from interviews, documentation review and observation.</p> <p>Permanent workers: 454 (Male: 424, Female: 30)</p> <p>Contract workers: 114 (note this is the most representative count of contractors on site at a given point)</p>
Summary of the Assessment Activities	<p>The assessment consisted of document review and preparation. While on site, the following activities took place:</p> <ul style="list-style-type: none"> <li>• Opening meeting</li> <li>• Site tour (plant operations)</li> <li>• External stakeholder interviews including representatives from local authorities, suppliers, and the local community.</li> </ul>

	<ul style="list-style-type: none"> <li>• Internal stakeholder interviews including representatives from workers (male and female), contractors, and management.</li> <li>• Closing meeting</li> </ul>
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### Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>El Paso has a management system to maintain compliance with applicable laws.</p> <p>El Paso maintains compliance with all environmental obligations, which is further subject to internal and external audits at scheduled intervals. The site maintains a subscription to a comprehensive source of up-to-date regulatory compliance information, to maintain compliance with legal obligations and regulatory updates.</p> <p>The site also engages with the corporate legal team on a regular basis, including the subject matter expert groups and the government relations groups.</p> <p>The human resources group also communicates and trains employees on labor-related laws and policies during its new hire orientation.</p> <p>Applicable laws and regulations are posted throughout the facility.</p> <p>This was confirmed by interviews with management; interviews with workers; site observations; and a review of documents including training material, annual audit program, meeting agendas, and environmental reports.</p>
2. Business Integrity	Fully meets	<p>El Paso implements a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.</p> <p>Relevant policies are primarily driven by corporate's Principles of Business Conduct (PBC), which is implemented, applied, and understood by site management and workers.</p> <p>The site monitors compliance with corporate policies by actively tracking employee completion of PBC and Anticorruption training.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the Principles of Business</p>

		Conduct, Business Partner Code of Conduct, anticorruption guidelines, and relevant policies.
3. Stakeholder Engagement	Fully meets	<p>El Paso conducts stakeholder engagement based upon an analysis of the local context and provides local stakeholders with access to appropriate and effective mechanisms for seeking resolution of grievances related to the company and its activities.</p> <p>The site performs and maintains detailed stakeholder maps for El Paso’s area of influence, documenting all engagements and interactions in Enablon.</p> <p>External grievance mechanisms are available to external stakeholders and aligned with the UN Guiding Principles on Business and Human Rights effectiveness criteria. The site holds bi-annual community partnership meetings with the local community to discuss site-level activities, community concerns, and the grievance management system.</p> <p>External stakeholders also relayed a positive working relationship with the site.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; and a review of documents including the Social Performance Management System, stakeholder mapping tool.</p> <p>The external grievance mechanism is accessible at <a href="https://freeportinmycommunity.com">freeportinmycommunity.com</a>.</p>
4. Business Relationships	Fully meets	<p>El Paso has policies and practices in place that are driven at both the site and corporate level to support the adoption of responsible health and safety, environmental, human rights and labor policies and practices by joint venture partners, suppliers, and contractors, based on risk. The process of determining “significant” suppliers was tested at site and implementation of supplier audits was confirmed with a supplier.</p> <p>A Compliance database and questionnaire are used to screen and assess potential business partners and suppliers. All supplier contracts contain clauses related to Freeport and El Paso’s policies including Human Rights, Business Partner Code of Conduct, Anti-Corruption, Health &amp; Safety, and Social Performance policies. This is supported by additional training requirements for contractors</p>

		<p>and optional monthly contractor meetings to cover policies and expectations and updates.</p> <p>This was confirmed by interviews with management; interviews with workers; interviews with a sampling of suppliers and contractors; and a review of documents including the corporate annual report, relevant policies, contracts, and documentation regarding ESG due diligence.</p>
5. Child Labor	Fully meets	<p>El Paso implements the corporate Human Rights Policy, which states that child labor will not be tolerated.</p> <p>During onboarding, workers partake in a background screening process to confirm that they are over 18. Training is also provided to workers.</p> <p>This was confirmed by interviews with management; interviews with workers; site observation; and a review of documents including the Human Rights Policy, communication campaigns, training files, and a sampling of personnel files.</p>
6. Forced Labor	Fully meets	<p>El Paso implements the corporate Human Rights Policy, which states that forced or compulsory labor will not be tolerated.</p> <p>Mechanisms are in place at El Paso to identify, assess, and eliminate potential employment and human rights risks related to forced labor and human trafficking. Training is provided to workers.</p> <p>This was confirmed by interviews with management; interviews with workers; site observation; and a review of documents including relevant policies, communication campaigns, training files, and personnel files.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>El Paso has in place policies, procedures, and practices to ensure they respect employees' rights to freedom of association and to collective bargaining. El Paso also applies this policy to its suppliers and contractors through training.</p> <p>The site does not currently have a workers' union. Nonetheless, management provides training to employees as part of new-hire orientation on their rights to a workers' union.</p> <p>During interviews, workers confirmed that they are able to form a union but did not feel the need to do so at the moment.</p>

		<p>This was confirmed by interviews with management; interviews with workers; site observations; and a review of documents including relevant policies.</p>
8. Discrimination	Fully meets	<p>El Paso follows the corporate Human Rights Policy, which states that no form of harassment will be tolerated, and policies, procedures and practices are in place to support this.</p> <p>Additionally, an Inclusion and Diversity Policy commits to providing fair access to opportunities, trainings, and promotions.</p> <p>At the corporate level, Freeport mandates training on the Principles of Business Conduct and Guiding Principles which cover inclusion and diversity, and the site's policies around discrimination, harassment (including sexual harassment), and other abusive situations. Training is tracked, and workers are able to speak to the training materials.</p> <p>No instances of discrimination or harassment were witnessed on site.</p> <p>This was confirmed through interviews with management; interviews with workers; site observations; and a review of documents including the Inclusion and Diversity Policy, training records, and Guiding Principles.</p>
9. Gender Equality	Fully meets	<p>El Paso implements policies and practices to respect the rights and interests of women that reflect gender-informed approaches to work practices and job design, and that protect against all forms of discrimination and harassment, and behaviors that adversely impact on women's successful participation in the workplace. Additionally, El Paso provides training on Pregnancy Accommodation and Lactation laws to front line supervisors.</p> <p>Corporate performs a gender pay gap analysis each year across all sites, concluding that women are paid .995 cents to the \$1 men are paid. Upon completion, a list of employees potentially facing inequity is provided to corporate, prompting them to review and adjust pay accordingly. Corporate also engages in events focused on fostering female leadership in the workplace.</p> <p>El Paso is not an affirmative action employer and therefore does not formally track and report on various workforce KPIs, however they still have</p>

		<p>recruiting efforts that may be focused on certain populations. At the Corporate consolidated level, demographic information from employees, including those at El Paso, are included and reported on in the Annual Sustainability Report.</p> <p>Interviewed female workers express a view that they have equal access to opportunities and are treated equally in the workplace.</p> <p>This was confirmed through interviews with management; interviews with workers, including females; site observations; and a review of documents including the Inclusion and Diversity Policy, gender pay gap analysis, and training records.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>At the corporate level, Freeport has a Working Hours &amp; Fatigue Management Policy that states that working hours shall not exceed 60 hours per week on average over a period of a calendar month unless it is done with voluntary, approved overtime.</p> <p>This policy also requires on average at least one rest day in seven. Human resources personnel are given training on this policy, and it is communicated to contractors and suppliers through their contracts and during the onboarding process.</p> <p>Workers are granted time off, and overtime is voluntary. Additionally, it was confirmed that hourly workers are paid extra for work performed over 40 hours.</p> <p>A comprehensive review of Freeport's Q4'2022 - Q3'2023 Working Hours Analysis for North America, including hours worked at the El Paso refinery and rod mill, found some employees worked over 60 hours averaging over a month during the quarter (approximately 4% of total employees). While the assessors were not able to conclude that these were isolated incidents or due to emergency or unusual work situations, the percentage of employees working over 60 hours per quarter was determined to be insignificant in relation to the total population.</p> <p>In the period the assessors reviewed, the assessors observed a reduction in the average percentage of employees exceeding the 60-hour requirement each quarter, that aligned with site initiatives implemented to manage working hours. Site efforts also demonstrate there are policies, procedures and practices in place as well as</p>



		<p>dedication to continuous improvement (i.e., ramping up the hiring of new employees and contractors to spread the working hours among more workers).</p> <p>There were mixed responses regarding willingness to work overtime, with some employees expressing pressure associated with operational deadlines, whereas others felt the Fatigue Management Policy restricted their overtime hours and therefore reduced opportunities to earn extra pay they had become accustomed to. However, based off our interview population, negative experiences were isolated in nature, as most employees were willing and/or eager to work voluntary overtime hours.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the relevant policies, personnel files, and a sampling of wage and time records.</p>
11. Remuneration	Fully meets	<p>El Paso has policies and procedures in place to provide fair wages and abide by national laws. Corporate performs a living wage analysis for sites on an annual basis, and employee wages at El Paso exceeded the living wage threshold for the area they operate in.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the relevant policies, personnel files, and a sampling of wage and time records.</p>
12. Occupational Health and Safety	Fully meets	<p>El Paso has a valid ISO 45001 certificate, recognized as equivalent.</p>
13. Grievance Mechanism	Fully meets	<p>El Paso has a grievance mechanism that is aligned with the UN Guiding Principles for Business and Human Rights effectiveness criteria.</p> <p>Grievances are received, investigated according to process, and closed and communicated in a timely manner. Confidentiality is respected throughout the process.</p> <p>Workers are aware of channels to raise issues with the company and demonstrate trust in following through with the process.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including a sampling of grievances and the grievance process.</p>

14. Environmental Risk Management	Fully meets	El Paso has a valid ISO 14001 certificate, recognized as equivalent.
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>El Paso measures and reports GHG emissions publicly through corporate's annual sustainability report. These amounts are third-party verified.</p> <p>El Paso tracks fuel and energy consumption through Enablon and assesses impacts to GHG emissions through the Management of Change process.</p> <p>El Paso does not have a specific site level reduction targets but engages in efforts to help further the corporate level reduction target. The GHG emissions intensity reduction target, established by corporate Freeport, is 15% reduction in Scope 1 and 2 emissions intensity by 2030 for America's copper, which includes the El Paso refinery, compared to the 2018 baseline, and an aspiration for net zero by 2050.</p> <p>Future projects have been reviewed and determined not to produce any additional emissions.</p> <p>This was confirmed through interviews with management; site observation; and a review of documents including the management of change policy and data collection.</p> <p>More information is available <a href="#">here</a></p>
16. Energy Consumption	Fully meets	<p>El Paso annually measures, monitors, and publicly discloses its energy consumption in the corporate sustainability report.</p> <p>The site seeks energy-efficiency and renewable energy opportunities through projects aligned with operational needs and cost considerations, assessed within El Paso's Management of Change (MOC) process. While there are no specific site-level reduction targets, efforts are directed towards supporting the corporate-level reduction target. Examples include an ongoing project with solar turbines aimed to increase renewable energy usage and decrease NOX and CO emissions.</p> <p>This was confirmed through site observations; interviews with management; and a review of documents including, the MOC list, and relevant policies.</p>

<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>El Paso commits to the corporate Environmental Policy.</p> <p>Water withdrawal in Texas is determined by land ownership, therefore there are no city or state restrictions to water withdrawal. Nonetheless, El Paso implements water stewardship practices through its own management activities and projects. These include: a zero-stormwater discharge facility, xeriscaping, and a voluntary clean-up program of confined soils identified as contaminated from previous owner use.</p> <p>El Paso has identified one water risk related to a sewer discharge permit, resulting in potential copper and arsenic exceedances in wastewater. To address this risk, El Paso has developed an associated action plan with clear and detailed description of the risk, outline of critical controls, responsible person, and target completion date.</p> <p>Future projects have been reviewed and determined not to produce any additional water stress.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; site observations; and a review of documents including the risk register, water data, and action plan.</p>
<p>18. Waste Management</p>	<p>Fully meets</p>	<p>El Paso applies the mitigation hierarchy to manage releases and waste and address potential impacts on human health and the environment.</p> <p>Sustainable development activities are considered throughout the project life cycle as part of the Management of Change process, including future projects to ensure materials are handled appropriately and recycling of material is considered.</p> <p>There is a management system in place to identify, assess, and classify the hazards according to the UN Globally Harmonized System of Hazard Classification and Labelling. The Site also has a Hazard Communication Program SOP noting responsibilities, procedures, and training instructions for hazard communication, which is also included in annual safety refresher trainings for workers.</p> <p>El Paso implements an asset recycling and disposition SOP, outlining the steps used for the</p>

		<p>valuation and recycling disposition of capital assets, inventory, direct charge, and scrap items specifically at El Paso.</p> <p>Some examples of resource-efficient projects include reusing wooden floorboards from anode prep to ship rod coils; compacting recyclables and non-hazardous waste to double the number of materials that fit in a roll-off bin; and switching from wooden pallets to plastic pallets due to increased durability and lifespan.</p> <p>This was confirmed through interviews with management; site observations; and a review of documents including the SDS management procedures (for hazardous waste), hazard communication program, asset recycling and disposition program, and management of change policy.</p>
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	<p>El Paso applies the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment. The site is also ISO 14001 certified.</p> <p>The main pollution risks identified are historic leaks, spills, and solution management practices causing an impact to groundwater; impact to groundwater from seeping of electrolyte solutions; land impacts from release of chemicals and process waters; impact to soil from loading and unloading. Each of these risks is classified as low or medium and have critical controls in place.</p> <p>El Paso also tracks and reports its air emissions as well as conducts a TRI (Toxic Chemical Release Inventory) reporting annually, which is an EPA requirement. This data is available <a href="#">here</a>.</p> <p>This was confirmed through interviews with management; site observations; and a review of documents including the site EMS manual, the Pollution Prevention Plan, the Spill Prevention, Control, and Countermeasure Plan, permits, and quarterly inspections of stationary emission sources.</p>
21. Biodiversity and Protected Areas	Fully meets	El Paso applies the mitigation hierarchy to avoid, minimize, reduce and compensate for adverse impacts on biodiversity. The site is also ISO 14001 certified.

		<p>Impact to biodiversity is regularly monitored as part of the site's risk register update.</p> <p>Two risks were identified: Migratory bird mortality occurring in an operational area; and threatened or endangered species are taken, injured, or destroyed on site. Each of these risks is classified as low or medium and have critical controls in place.</p> <p>To achieve no net loss on biodiversity, the site has a Pollinator Garden registered as Monarch Waystation and has implemented an avian project to create a habitat for burrowing owls previously seeking shelter in stormwater pipes. In addition, annually, site management and employees lead interactive environment-focused activities at a local Earth Day event with a local elementary school and other community partners.</p> <p>This was confirmed through interviews with management; visual observations during our on-site visit, and a review of documents including the risk register, monitoring protocols, and information about the species and habitat management project.</p>
22. Mine Closure and Reclamation	Not applicable	<p>This criterion is not applicable to non-mining operations.</p> <p>However, El Paso maintains a detailed closure plan, most recently approved in 2005, that is updated (including the financial provisions) and re-submitted to authorities when there are substantial new projects or expansions and is part of the project environmental evaluation and permitting process.</p>
23. Community Health and Safety	Fully meets	<p>El Paso has processes in place to address community health and safety issues. This is primarily managed through the risk register and community partnership meetings. El Paso also implements the Corporate-driven SPMS Social Baseline Data &amp; Impact Assessment Standard of Practice, which includes guidelines on planning and implementing risk-based controls to avoid / prevent, minimize, mitigate, and / or remedy health, safety and environmental impacts to workers, local communities, cultural heritage, and the natural environment based on international best practices.</p> <p>Given El Paso operation's industrial location and nature of activities (rod mill and refinery), the site is not at a high risk of project-related impacts.</p>

		<p>Controls to community health and safety include predictive air emissions monitoring and sampling. El Paso engages with the community on topics such as emergency response and safety during the community partnership meetings.</p> <p>This was confirmed through interviews with management; interviews with members of the community; and a review of documents including the social baseline data and impact assessment SOP.</p>
24. Community Development	Fully meets	<p>El Paso has policies in place to engage with stakeholders on community development projects and provide access by local enterprises to procurement and contracting opportunities.</p> <p>El Paso engages in strategic social investments around Economic Opportunity, Education &amp; Workforce Development, Capacity &amp; Leadership. El Paso has also received several awards for their contributions to the local community.</p> <p>El Paso aims to procure locally first and whenever possible through implementation of the North American Local Procurement Strategy SOP, describing the local procurement strategy utilized by all North American sites. This is implemented through expenditure summary controls in place to consider local suppliers, use of local supplier lists, and outreach to identify initiatives to enhance opportunities for local enterprises and contractors through participation in community organizations and activities.</p> <p>This was confirmed through interviews with management; interviews with stakeholders including a local supplier; and a review of documents including the social investment standard of practice, local procurement strategy, local supplier lists, training materials, the Social Performance Policy, and information on United Way.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>The assessment confirmed there is no ASM in the area of influence.</p>
26. Human Rights	Fully meets	<p>El Paso has mechanisms in place to assess potential and actual human rights risks and impacts in its operations and throughout the supply chain primarily follow corporate guidelines and policies, such as the Responsible Sourcing Policy, Human Rights Policy, Principles of Business Conduct and Social Performance Policy. Employees, contractors,</p>

		<p>and security contractors receive mandatory training on the matter. There is commitment and alignment to the UN Guiding Principles on Business and Human Rights.</p> <p>For suppliers, the Human Rights Policy is included as required reading within the questionnaire and written as a clause within supplier contracts. For contractors, the El Paso Global Supply Chain team holds monthly meetings to communicate safety expectations and policies including the Business Partner Code of Conduct.</p> <p>Mechanisms are in place to assess potential and actual human rights risks and impacts. For El Paso, this primarily focuses on labor rights and risks with neighboring organizations.</p> <p>For labor rights, El Paso tracks and reports on yearly completion of the PBC training in the 2022 Annual Report on Sustainability. The site evidenced conformance with corporate policies and practices by providing evidence to verify that 100% of employees had completed the PBC training in 2023.</p> <p>The El Paso operations are located in an industrial area, where the surrounding community consists of mostly organizations. There is an effective external grievance mechanism in place.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; site observations; and a review of documents including desk-based research, the Human Rights Policy, Principles of Business Conduct training, and the UNGP implementation documents.</p>
<p>27. Security and Human Rights</p>	<p>Fully Meets</p>	<p>This criterion is not applicable to non-mining operations.</p> <p>Nonetheless, the assessors reviewed and evaluated this criterion as El Paso contracts security officers and supervisors, managed by the site health and safety team.</p> <p>The site has formally adopted the corporate Human Rights Policy, which is guided by the Voluntary Principles on Security and Human Rights.</p> <p>The security contract firm has an ongoing contract that requires adherence to the corporate Human Rights Policy and any international human rights.</p>

		<p>The contractor company is also required to provide a copy of the Human Rights Policy to all subcontractors and employees and representatives.</p> <p>Safety expectations are discussed during monthly contractor meetings, in which the security contractors are included.</p> <p>The site provided SOPs with related forms outlining security job requirements, procedures and safety protocols. While Texas state law permits the open carry of firearms. El Paso Operations prohibits firearms onsite, which is supported by signage at the main security gate.</p> <p>This was confirmed through interviews with management; an interview with a security contractor; site observation; and a review of documents including security procedure SOPs and the Human Rights Policy.</p>
28. Indigenous Peoples' Rights	Not applicable	<p>While there were previous isolated interactions with indigenous peoples, these interactions occurred outside of the assessment period, and assessors were able to confirm through a review of the geographic location and interviews with stakeholders that there are no indigenous peoples in the area of influence.</p>
29. Land Acquisition and Resettlement	Not applicable	<p>The assessment confirmed the site boundary is landlocked by surrounding other industrial properties and there are no plans for exploration or other activities to expand the property boundary.</p>
30. Cultural Heritage	Not applicable	<p>No cultural heritage has been identified and the assessment confirmed there are no World Heritage Sites near to operations.</p> <p>However, El Paso performs an annual (at a minimum, or when significant changes occur through the Management of Change process) risk assessment which is documented within their register and tracked in their system. Risks that require action plans are also monitored and tracked within the system.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; and a review of documents including the management of change process, capital projects, and critical controls inventory.</p>



<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>El Paso sources primarily from other Freeport-McMoRan facilities in North America. On occasion, El Paso will source copper cathode from outside of the company's sites to meet production demands.</p> <p>Freeport-McMoRan has comprehensive and established policies, processes, and management frameworks in place, which fully align with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals for Conflict Affected and High-Risk Areas and the Copper Mark Joint Due Diligence Standard.</p> <p>El Paso is fully covered by these systems.</p> <p>This was confirmed through interviews with management; and a review of documents including the Corporate / Sales &amp; Marketing SOPs for implementation of the 5-step process for implementation of the OECD guidelines in mineral purchases, review of minerals supply chains and Freeport-McMoRan assessment of red flag issues and associated management actions at the site, and the process for assessing risk in purchases of goods and services.</p>	
	<p>31.a. Management System</p>	<p>Fully meets</p>	<p>At corporate level, there is a publicly available Responsible Sourcing of Minerals Policy, supplier questionnaires, a Conflict Affected and High-Risk Areas (CAHRA) identification tool, and training to support implementation.</p> <p>The policy is overseen by the Sustainability Leadership Team at corporate level and implemented at site.</p> <p>Authorities and accountabilities and resources are well allocated proportional to the size and complexity of the operations. Senior leadership is responsible for review and revision of the system.</p> <p>There are channels to address supply chain concerns early and remediate impacts, which are described in the Business Partner Code of Conduct, the Principles of Business Conduct, and at Fcx.com.</p>
	<p>31.b. Red Flag Identification Process</p>	<p>Fully meets</p>	<p>At the corporate level, there is a process to identify CAHRAs.</p> <p>The Freeport-McMoRan CAHRA assessment has determined that the USA (location of facility) is not a CAHRA.</p>

			No red flags were identified regarding the location of the internal company supplier operations or its external sources.
	31.c. Risk Assessment Process	Not applicable	Not applicable as no red flags were identified.
	31.d. Risk Management Process	Not applicable	Not applicable as no red flags were identified.
	31.e. Public Reporting	Fully meets	The corporate Step 5 report covers the management system implementation at El Paso. It is available <a href="#">here</a> .
32. Transparency and Disclosure		Fully meets	<p>El Paso publicly supports the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project (<a href="#">Freeport-McMoRan   EITI</a>).</p> <p>Additionally, while EITI is not enacted in the USA, the site's cash payments to the US government are reported to Freeport Corporate and disclosed as part of the Annual Sustainability Report.</p>

## 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 checked="" 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 to fully meet all applicable Copper Mark Criteria by 18 September 2025.	<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	<input type="checkbox"/>

Copper Mark Criteria by 18 September 2025.	
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 type="checkbox"/>
The Nickel Mark	<input checked="" 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 Nickel Mark are awarded	5 February 2024
Expiry Date of The Copper Mark and The Nickel Mark	4 February 2027