



Assessment Summary Report

Participant Information

Name of the Site	Kennecott Utah Copper LLC
Unique identifier provided by the Copper Mark	P0001
Address	Kennecott Utah Copper, Refinery 11500 W 2100 S, Magna, UT, 84044, USA
Country of Operation	USA
Principle covered products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathode, molybdenum concentrate, lead carbonate, crude selenium, sulphuric acid, tellurium
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, silver, gold, molybdenum, lead, tellurium
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, silver, gold, molybdenum, lead, tellurium
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 checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" 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
NA	NA	NA

Independent Site Assessment Information

Name of the Lead Assessor	Josue Ruiz
Name of the Assessment Firm (if applicable)	RCS Global Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	13/03/2023 – 16/03/2023
Assessment Period	1 March 2022 – 28 February 2023 Follow up: 14 November 2023
Summary of the Assessment Methodology	<p>The assessment was conducted using the ISO 19011:2018 methodology on the application of the Copper Mark Criteria for Responsible Production, using the following assessment criteria:</p> <ul style="list-style-type: none"> • Risk Readiness Assessment (RRA) of the Responsible Minerals Initiative (RMI) • RRA – Copper Mark Criteria Guide of February 2020 • Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (Joint Due Diligence Standard) <p>The assessment was carried out using a risk-based approach and using a sampling process considering a representativeness criterion for selection. Greater specifics are included in detail in each criteria section of this report.</p> <p>As part of the risk-based approach, the following criteria were considered:</p> <ul style="list-style-type: none"> • Size and complexity of the audit

	<ul style="list-style-type: none"> • Adequacy of systems and processes to detect inconsistencies. • Understanding of the audit programme • Controls over compliance with legal requirements • Controls over relevance and reliability of information • Controls over programme operations • General control of information systems <p>Second- or third-party audits relevant to the objectives of the audit.</p> <p>An assessment of the mentioned criteria was conducted by the lead auditor during the pre-assessment.</p> <p>Permanent workers: 2363</p> <p>Contract workers: 3552</p>
Summary of the Assessment Activities	<p>The independent site assessment activities included:</p> <ul style="list-style-type: none"> • Opening meeting • Worker interviews • Stakeholder interviews • Management interviews • Walkthrough of the facilities • Policies, procedures and records review • Closing meeting

Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Kennecott Utah Copper (KUC) has developed and implemented an adequate and effective legal compliance process to monitor, identify and ensure compliance with applicable national and international laws and customer requirements applicable to site operations.</p> <p>This was confirmed through management interviews and document review including the operations permit, risk register, and licenses register, among others.</p>
2. Business Integrity	Fully meets	KUC has developed and implemented an adequate and effective policy and procedures to uphold the highest

		<p>standards of integrity in all business interactions, with zero tolerance to all forms of bribery, corruption, extortion, and embezzlement.</p> <p>KUC has defined which actions, conducts or practices may constitute violation of misconduct to the business integrity policy. A process is in place to investigate risks of corruption; maintain records of actual or potential business integrity violations from their report to closure.</p> <p>This was confirmed through management interviews; worker interviews, and document review including the “the way we work” policy, business integrity standards, business integrity procedure, and business integrity risk register, among others.</p>
3. Stakeholder Engagement	Fully meets	<p>KUC has conducted a risk assessment with regards to the potential social impacts of the site operations; through this process it has identified stakeholders and has committed to continuously engage with them through a five-year strategy (2023-2028). The roadmap for this engagement outlines activities with each stakeholder; these activities focus on community development, environment, people, education and mine closure.</p> <p>KUC has developed and implemented a grievance mechanism aligned with the UN Guiding Principles’ Effectiveness Criteria for Non-Judicial Grievance Mechanisms.</p> <p>This was confirmed through management interviews; community interviews; and document review including the stakeholder map, stakeholder engagement strategy, and grievance mechanism, among others.</p> <p>More information is available here and here.</p>
4. Business Relationships	Fully meets	<p>KUC has developed and implemented a system to promote responsible business practices with significant</p>

		<p>business partners. Contracts between KUC and suppliers, labor agents and contractors include language on the implementation of policies on human rights, health and safety, environment, ethics and compliance of legal requirements. KUC has identified its significant business partners, which are periodically evaluated, and whose performance is rated according to risk level. Due diligence is conducted on prospective partners, risk mitigation plans are established and followed up to closure.</p> <p>This was confirmed through management interviews; worker interviews; and document review including the contracts with suppliers, contractor’s performance charter, and risk mitigation records, among others.</p>
5. Child Labor	Fully meets	<p>KUC has developed and implemented a system to ensure workers below the legal minimum working age are not hired. This system proactively screens applicants to verify their age through the document review process and ensures reliability of age documents. Access controls are in place to only allow entrance to mine operations through an ID verification system, to only allow approved workers to the operations. No underage persons were observed onsite.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the employment policy, supplier code of conduct, and onboarding records, among others.</p>
6. Forced Labor	Fully meets	<p>KUC has developed a system to ensure no forms of forced, bonded, involuntary, prison, trafficked or slave labor are used. Through the hiring process, KUC, does not charge fees or retains original identity documents of workers. The site policy allows unrestricted movement and ensures voluntary overtime; no illegal fees,</p>

		<p>penalties or personal loans are used by the site.</p> <p>Hiring contracts are free of clauses that can entail any type of forced labor. At the end of the labor relationship, workers receive a severance payment in accordance with legal requirements.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the employment policy, payroll records, worker files, and work hour records, among others.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>KUC respects workers legal right to assemble, join unions and bargain collectively. There are four unions that concentrate all workers and one valid collective bargaining agreement. Equal treatment is provided to workers of different memberships, the company does not interfere on union activities and remain neutral.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the Rio Tinto employment policy and supplier code of conduct, collective bargaining agreement, and union meeting minutes, among others.</p>
<p>8. Discrimination</p>	<p>Partially meets</p>	<p>KUC has policies and procedures that ban discrimination and harassment in the workplace. Kennecott implements the Rio Tinto Employment Policy and Supplier Code of Conduct (March 2022) and implements the policy through training and the establishment of pertinent operational procedures.</p> <p>There is no evidence of discrimination on site.</p> <p>In 2021, the Rio Tinto company launched a group-level initiative to assess the work environment across all RT site operations including direct and indirect workers. The resulting report, "Everyday Respect Report" prompted a</p>

		<p>five-point strategy program to address harassment and discrimination issues.</p> <p>Kennecott, along with all other Rio Tinto business units, continue to progress Everyday Respect report actions. Data points indicate that RTK are meeting system and process requirements for this risk area; however, it is acknowledged that the response to the Everyday Respect report findings requires sustained effort by the company and each business unit to continue to improve workplace culture and the felt.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Actions resulting from an independent review of the Rio Tinto (parent company) workplace culture to better understand, prevent and respond to harmful behaviours across the global operations are in progress with a planned implementation review in 2024. Of the five points in the plan, 3 were still in progress with one of the three completed at 96.3% as of November 2023. <p>This was confirmed through interviews with management; interviews with workers; site observations; and a review of documents including job adverts, health check records, promotion records, and onboarding materials.</p>
9. Gender Equality	Partially meets	<p>KUC has developed and implemented policies and procedures on respect for diversity and equality in the workplace. KUC is currently implementing initiatives aimed to increase the hiring of women and to promote gender equality. KUC includes on its annual public report, data and progress made on gender equality.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Actions resulting from an independent review of the Rio Tinto (parent company) workplace culture

		<p>to better understand, prevent and respond to harmful behaviours across the global operations are in progress with a planned implementation review in 2024. Of the five points in the plan, 3 were still in progress with one of the three completed at 96.3% as of November 2023.</p> <p>While the Copper Mark does not generally cite the same finding for two criteria, in this case both criterion 8 and 9 have been self-assessed as partially meets to ensure the follow up actions are completed.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; stakeholder interviews; and document review including the diversity policy, sustainability fact book 2022, and employee roster, among others.</p>
10. Working Hours	Fully meets	<p>KUC has developed and implemented a system to determine, communicate, record, manage and control working hours including overtime. While there were instances of work hours exceeding 60 hours per week and more than 6 consecutive days of work, they were not systemic.</p> <p>This was confirmed through worker interviews; management interviews; and document review including the working hours records and payroll records.</p>
11. Remuneration	Fully meets	<p>KUC has developed and implemented a system to pay workers' wages that exceed national minimum wage. Wages are paid directly to workers with no delays, wages and benefits are paid in accordance with the collective bargaining agreement. KUC ensures workers are trained to understand wage structure and receive wage statements.</p> <p>This was confirmed through worker interviews; management interviews;</p>

		and document review including payroll records, leave records, and severance payment records, among others.
12. Occupational Health and Safety	Fully meets	<p>KUC has developed and implemented a health and safety management system designed to be equivalent to OSHAS 18001; the last OSHAS certificate expired in December 2017. A strong safety culture is observed across the organization with a target to achieve zero harm. Accidents and incidents are investigated and communicated; corrective action plans are developed as result of such investigation and improvements are tracked to closure.</p> <p>KUC has conducted occupational health and safety risk assessments and has procedures in place to address such risks; emergency response plans are available for each operation area; emergency response teams are trained on a weekly basis; emergency drills are conducted.</p> <p>KUC fosters continuous improvement with regards to OHS, measures improvements and follows up with action plans, has established KPIs and annual goals. Facilities are supplied with emergency response material and equipment, in alignment with the risk assessments.</p> <p>A clinic is available to evaluate occupational issues and carry out medical examinations on workers; the frequency is determined by safety exposure of workers.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the risk assessment, audit results, H&S committee meetings, and training records, among others.</p>
13. Grievance Mechanism	Fully meets	KUC has an adequate and effective grievance mechanism that is available to all workers; such system allows for anonymous and confidential

		<p>communication and can be used without fear of retaliation. KUC has developed procedures that outline what actions, conduct or practices may be considered misconduct; an investigation process describes the steps from the reception of the grievance to its closure and communication to involved parties.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including “the way we work” policy, business integrity standard, and myVoice procedure, among others.</p>
<p>14. Environmental Risk Management</p>	<p>Fully meets</p>	<p>KUC has implemented an environmental management system that addresses the main environmental risks of the operation. This system is designed to be equivalent to ISO 14001, however, the last certificate expired in December 2018. An internal assessment was conducted in 2023, and the assessors confirm the system is functionally equivalent to ISO 14001.</p> <p>KUC maintains a permit register which is continuously updated and used hand in hand with a master schedule to track all regulatory requirements. KUC has carried out risk identification and risk management in all environmental aspects; and has establishes improvement objectives and goals at different levels of the organization.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the environmental risk assessment, audit results, and training records, among others.</p>
<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>Kennecott Utah Copper quantifies and annually reports on CO2 equivalent emissions in line with the international reporting protocols via the Sustainability report of Rio Tinto, parent company of KUC.</p>

		<p>KUC reports having a 60% reduction of emissions in comparison with 2018 values (baseline); current KUC efforts are focused on strategies to mitigate Scope 1 emissions. Rio Tinto and KUC goal is to achieve a 15% reduction of 2018 baseline GHG emissions by 2025, and 50% by 2030 for the whole company. In 2021, KUC already achieved 56% reduction through the RECs until 2025. KUC will strive to reach the goal of 0% carbon emissions by 2030 as the initial goal of 15% reduction has already been met. This is complemented by a plan and schedule to get there, plans include reduction consumption of electricity diesel and natural gas.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the energy management policy, Rio Tinto’s sustainability report, and climate change statement, among others.</p> <p>See here for more information.</p>
16. Energy Consumption	Fully meets	<p>Kennecott Utah Copper has developed a policy, procedures and strategy regarding energy; covering financial risk, power volatility, carbon footprint, reduction targets, and actions aimed to control demand, improve efficiency and diversify energy supply sources.</p> <p>KUC purchases renewable energy certificates to offset electricity use emissions. The site has carried out an energy consumption analysis to identify the types of energy used and their impact. Improvement actions have been focused to improve energy efficiency where high consumption is recorded as a means to obtain a larger positive impact. Public annual reporting on energy consumption and energy initiatives are made on a corporate level.</p> <p>This was confirmed through management interviews and document</p>

		<p>review including the energy management policy, Rio Tinto’s sustainability report, and climate change report, among others.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>Kennecott Utah Copper has conducted a comprehensive assessment of water-use impacts and risks with relevant stakeholders. KUC has a water rights portfolio, perpetual water rights in its majority, and temporary water rights noted valid and renewed annually.</p> <p>KUC reports to the water authority on water use, wastewater discharge sampling results in alignment with permits. Effluents final discharge include discharge to water bodies or tailings facility depending on the use, composition and prior treatment; such water quality is analyzed for compliance; this in concert with internal audits allows the site to identify gaps and timely address them.</p> <p>KUC engages in public annual reporting on water management; targets to reduce water consumption, natural resources protection activities and performance against targets.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the water rights, groundwater discharge permits, water management plan, and Rio Tinto’s sustainability report, among others.</p>
<p>18. Waste Management</p>	<p>Fully meets</p>	<p>Kennecott Utah Copper has developed a risk-based waste management system with commitment to waste hierarchy that is applicable to all waste types generated by the site. The waste management system follows a waste management plan and standard operation procedures, supported by staff training. Adequate storage facilities and segregation practices are implemented at the site; supported by inspections to verify alignment to procedures.</p>

		<p>KUC has a process to approve vendors engaged in the waste management lifecycle; and continuously monitors compliance through audits. The site maintains a document system on waste generation, transportation and final disposition.</p> <p>KUC engages in public annual reporting of its waste management system, including targets to reduce waste generation and information on their recycling initiatives, as well as performance against targets. KUC biannually report to regulators on its waste management practices.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the waste management plan, waste management standard operating procedures, waste storage inspections, vendor audits, and manifests of disposition, among others.</p>
<p>19. Tailings Management</p>	<p>Partially meets</p>	<p>Kennecott Utah Copper designs operates and monitors tailings impoundments while minimizing adverse impacts to human health and the environment.</p> <p>KUC has developed a policy and procedures to cover risks associated with tailing facilities and has carried out a gap analysis against the Global Industry Standard on Tailings Management; gaps identified are accompanied by a corrective action plan to align to such standard; this plan is followed up in a monthly basis. KUC's tailings facilities are classified as high risk, thus the company has until August 2025 to fully comply with the GISTM.</p> <p>KUC has implemented controls to ensure safe construction, operation and maintenance of tailings facilities; these controls include supervision of construction and operation, trained operators and maintenance personnel, senior geotechnical engineers</p>

		<p>monitoring stability and emergency response plans.</p> <p>KUC inspects tailing impoundments on a daily and weekly basis against the operations and maintenance manuals; other inspections and verifications include the technical risk review every two years and government inspections. KUC submits annually to the state government on their dam safety permit requirements; simultaneously, information on tailings management is included in Rio Tinto's annual corporate sustainability report.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • KUC has not fully implemented the Global Industry Standard on Tailings Management. <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including the tailings and water storage standard, tailings management procedure, gap analysis, action plan for GISTM compliance, and operational and technical risk reviews, among others.</p>
20. Pollution	Fully meets	<p>KUC implements the mitigation hierarchy to avoid, minimize, reduce and compensate for the adverse impacts of pollution on human health and environment due to air emissions.</p> <p>KUC has evaluated and identified pollution sources of the site operations and installed mitigation equipment; monitors emissions via measurement through equipment, calculation or estimates; results are compiled on an inventory; parameters covered include SO₂, NO_x, opacity and particulates, among others. KUC annually applies for approval to state government on their air emission management plan.</p> <p>Results of the monitoring process are reviewed against permit limits and internal operational limits. KUC reports monthly, quarterly, and annually to the</p>

		<p>state authority on air quality parameters and receive periodic inspection from state regulators. When deviations are identified, the causes are investigated, and gaps are addressed through action plans.</p> <p>Information on pollution is publicly reported in Rio Tinto's annual corporate sustainability report.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including air emissions management plan, air quality monitoring, monitoring data, and Rio Tinto sustainability report, among others.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Fully meets</p>	<p>Kennecott Utah Copper has a program to manage biodiversity and protected areas through the mitigation hierarchy, focusing efforts on the land outside the operation boundaries. KUC developed a baseline of the biological features and potential areas of risk to biodiversity. Policies and procedures on the topic are supported by training for new hires and annual refresh for all workers.</p> <p>KUC biodiversity risk assessment result is classified as low as no endangered or threatened species and no world heritage sites are found in the area of influence of KUC. KUC has taken a proactive approach with engaging stakeholder related to biodiversity opportunities, including partnering with organizations to manage deer and elk population sustainably, improve water levels for migratory birds through their avian protection plan; and partnered with the local university to investigate and document risk of fire and how to manage it.</p> <p>KUC protection practices regarding biodiversity are inspected by the US Fish and Wildlife Service. KUC evaluates quarterly if new regulation</p>

		<p>related to biodiversity has been published.</p> <p>This was confirmed through site walkthrough; worker interviews; management interviews; and document review including Rio Tinto's biodiversity and natural resources protection standard and guidance, HSEC policy, and KUC biodiversity strategy, among others.</p>
22. Mine Closure and Reclamation	Fully meets	<p>KUC has documented a mine closure and reclamation plan and has submitted this plan to the applicable regulatory agencies; the scope of this plan includes mines, concentrator, canyon shaft and tailings impoundment.</p> <p>KUC updates such plans as necessary and applies for regulatory agency approvals.</p> <p>KUC has developed an internal mine closure plan that does include secondary facilities (smelter and refinery) and has a social component; it considers stakeholder input from community and NGO on closure issues. The cost estimates are audited by third-party financial auditors.</p> <p>KUC is currently implementing reclamation activities on lower benches of the waste rock dumps and in the tailings impoundment; rocks have been re-sloped and topsoil placed for revegetation activities.</p> <p>This was confirmed through site walkthrough; employee interviews; management interviews; and document review including closure standard and guidance, prefeasibility study- closure plan and cost estimates, among others.</p>
23. Community Health and Safety	Fully meets	<p>KUC has implemented a policy on its commitment to community health and safety; and has identified health and safety impacts affecting communities through a baseline community</p>

		<p>assessment completed by an external consultant.</p> <p>KUC has a program to monitor, avoid and minimize adverse health and safety impacts; this is part of the stakeholder engagement strategy, which outlines activities to be implemented and the associated risks. KUC has a system to manage the grievance mechanism and a grievance register to respond to community complaints.</p> <p>KUC presents to community stakeholders on mine operations and tailings dust handling process and the efforts to prevent adverse impacts in the community.</p> <p>This was confirmed through site walkthrough; employee interviews; management interviews; and document review including human rights policy, baseline community assessment, grievance register, and business resilience management plan, among others.</p>
<p>24. Community Development</p>	<p>Fully meets</p>	<p>KUC has developed a strategy to guide its work on community engagement and development; by summoning stakeholders to activities and participatory forums to consult on community needs and by contracting external consultants to carry out social impact assessments.</p> <p>KUC's targets on community development fall under the topics of economic development, culture, heritage and place, and community capacity and connections.</p> <p>This was confirmed through management interviews; employee interviews; external stakeholder interviews and document review including the communities and social performance standard, annual sustainability factbook, and investment strategy, among others.</p>

25. Artisanal and Small-Scale Mining	Not applicable	Assessment confirmed there is no artisanal and small-scale mining in the area of influence.
26. Human Rights	Fully meets	<p>KUC has implemented policies on human rights with a commitment meet the UN Guiding Principles on Business and Human Rights, IFC requirements, OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Voluntary Principles on Human Rights on Security, ICMM mining principles, and labor rights.</p> <p>KUC has assessed and documents potential risks to human rights into the categories of social, political, cultural, legal and economic rights. Training is conducted during onboarding and also of annual refresher on the topic.</p> <p>This was confirmed through management interviews; employee interviews; external stakeholder interviews and document review including the human rights policy, annual sustainability factbook, and training on human rights policy, among others.</p>
27. Security and Human Rights	Fully meets	<p>KUC has implemented a security and human rights policy and guidance aligned with the UN Declaration of Human Rights, the UN Global Compact, and the Voluntary Principles on Security and Human Rights.</p> <p>Language on these commitments is included in contracts with the private security service provider; and training materials for security guards that also cover the matter.</p> <p>This was confirmed through site observation; management interviews; employee interviews and document review including the security and human rights policy, security guidance notes for human rights, contract with private security agency, and training materials, among others.</p>

<p>28. Indigenous Peoples' Rights</p>	<p>Fully meets</p>	<p>KUC has implemented policies and procedures on its commitment to indigenous people's rights to align with the UN Declaration of the Rights of Indigenous Peoples by identifying and engaging with them, as well as with following legal requirements regarding consultation whenever they are found in the site's area of influence.</p> <p>KUC has implemented protocols to undertake cultural heritage identification and impact assessments. The nearest native American community is located approximately 100 miles from the company's operations.</p> <p>This was confirmed through site observation; management interviews; external stakeholder interviews and document review including the cultural heritage management plan, cultural sites, and archaeological sites report, among others.</p>
<p>29. Land Acquisition and Resettlement</p>	<p>Fully meets</p>	<p>KUC has implemented policies and procedures governing land acquisition and the provisions in case of resettlement, as well as addressing the process to assess associated impacts. KUC holds property titles for the operation area it occupies, which they've held for the past 100 years.</p> <p>A plan to expand the tailings facilities will require the purchase of an adjacent lot from a private owner, no resettlement is applicable as no housing settlements are in the area.</p> <p>This was confirmed through management interviews and document review including the communities and social performance standard, and property titles, among others.</p>
<p>30. Cultural Heritage</p>	<p>Fully meets</p>	<p>KUC has implemented policies and procedures to identify and protect cultural heritage.</p> <p>The company has mapped historic sites and pre-Hispanic resources on its area of influence; KUC has developed</p>

			<p>a stewardship plan to preserve these sites and resources with the support of the state historic preservation office.</p> <p>This was confirmed through management interviews and document review including the communities and social performance standard, cultural sites and archaeological sites inventory, among others.</p>
	31. Due Diligence in Mineral Supply Chains	Fully meets	<p>KUC has implemented a system on responsible mineral sourcing in alignment with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas.</p> <p>This was confirmed through management interviews and document review including the supplier code of conduct, the way we work policy, and the due diligence records, among others.</p>
	31.a. Management System	Fully meets	<p>KUC has developed policies and procedures on responsible mineral sourcing that commit to implementing the OECD Due Diligence Guidance; this is implemented through a “know your third-party procedure”.</p>
	31.b. Red Flag Identification Process	Fully meets	<p>KUC has a “know your third-party procedure” and supplier risk assessment, to carry out identification of risks/red flags in the company’s supply chain and includes criteria of the OECD Due Diligence Guidance Annex II risks.</p>
	31.c. Risk Assessment Process	Fully meets	<p>KUC has implemented a “know your third party” procedure and supplier risk assessment, to identify risks/red flags in the company’s supply chain explicitly including the criteria of the OECD Due Diligence Guidance Annex II risks. The results of such due diligence disclose no high-risk suppliers.</p>
	31.d. Risk Management Process	Fully meets	<p>Based on the implementation of the “know your third party” procedure and supplier risk assessment, no high-risk suppliers or supply chains have been</p>

			identified; thus, the risk mitigation process has not been activated.
	31.e. Public Reporting	Fully meets	KUC's due diligence steps and practices are made publicly available at the parent company website. More information is available here .
	32. Transparency and Disclosure	Fully meets	The parent company Rio Tinto engages in regular public reporting, for financial and non-financial practices. The latter through an annual sustainability report using GRI requirements. This sustainability report covers environmental, social and governance performance. More information is available here .

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 to fully meet all applicable Copper Mark Criteria by 19 May 2025.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some, or all of the applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 19 May 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	<input type="checkbox"/>

Joint Due Diligence Standard. The Site has not committed to continuous improvement.	
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 Mark are awarded	6 February 2024
Expiry Date of The Copper Mark and The Molybdenum Mark	5 February 2027