



## Assessment Summary Report

### Participant Information

Name of the Site	Atlantic Copper
Unique identifier provided by the Copper Mark	P0005
Address	Metallurgical Complex: Avda. Francisco Montenegro, s/n 21001 – Huelva Central Office: Edif. Torre Europa, Paseo de la Castellana, 95 Planta 21- 28046 - Madrid
Country of Operation	Spain
Principle covered products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathode, copper anode and nickel carbonate
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper and Nickel
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper and Nickel
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	N/A
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Fabrication	<input type="checkbox"/>
Other ( <i>please explain</i> )	Precious metal slimes

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

<p>The following equivalent systems were applied:</p> <p><i>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 <a href="#">Copper Mark Recognition Process</a>.</i></p>		
Equivalent System	Review Process	Criteria Covered by Equivalency
<p>ISO 14001</p> <p>Valid until 5 July 2025</p>	<p>The assurance / certification was confirmed to be:</p> <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>	<p>14. Environmental Risk Management</p>
<p>ISO 45001</p> <p>Valid until 29 January 2026</p>	<p>The assurance / certification was confirmed to be:</p> <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</li> </ul>	<p>12. Occupational Health and Safety</p>

	<p>reassessment are underway</p> <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>	
--	--	--

### Independent Site Assessment Information

Name of the Assessment Firm (if applicable)	Ernst & Young (EY)
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	November 6, 2023 - November 10, 2023
Assessment Period	January 1, 2021 – November 10, 2023
Summary of the Assessment Methodology	<p>The methodology used for the assessment consisted of a site visit to the Atlantic Copper (“AC”) facility, interviews with employees, 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>Atlantic Copper is part of the Freeport-McMoRan group, subject to corporate-level policies and procedures.</p> <p>Permanent workers: 801 (Male: 653, Female: 148)</p> <p>Contract workers: 393</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 (refinery, port/scrap yard concentrate warehouse)</li> </ul>

	<ul style="list-style-type: none"> <li>• External stakeholder interviews, including representatives from local authorities, educational academic community, the local community, and suppliers.</li> <li>• Internal stakeholder interviews, including representatives from workers (male and female), contractors, and management.</li> <li>• Closing meeting</li> </ul>
--	--

### Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Atlantic Copper (AC) has a management system that effectively ensures they are fully compliant with all national legal requirements. Policies and procedures are in place to ensure regular monitoring of legal information.</p> <p>AC's Board of Directors and Management Committee oversee the Crime Prevention Committee which include the Global Compliance Team. Compliance also works with Legal Compliance Analysts as well as the Internal Audit Coordinator who manages various control owners.</p> <p>As per the Spanish Criminal Code, a risk assessment and periodic review of the compliance program is conducted, making the necessary adjustments when serious violations occur or when the company undergoes organizational, structural or economic changes.</p> <p>The Directorate of Legal Affairs is responsible for the identification of legal requirements applicable to the site, through the subscription to information and alert services of legal requirements and legislative developments. The site also engages with Corporate legal on a regular basis, including the Subject Matter Expert (SME) groups and the government relations groups.</p> <p>The Human Resources group communicates and trains employees on labour-related laws and policies through the Principles of Business Conduct during new hire orientation and annual</p>

		<p>training, as well as through communication of the Collective Agreement negotiated with the site's trade unions.</p> <p>This was confirmed by interviews with management; and a review of documents including the relevant policies, annual audit program, and monthly reports, among others.</p>
<p>2. Business Integrity</p>	<p>Fully meets</p>	<p>AC implements a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behaviour.</p> <p>Relevant policies are primarily driven by corporate's Principles of Business Conduct (PBC), and the Anti-Corruption Policy and Criminal Compliance Policy which is implemented, applied and understood by the site. The site ensures compliance with corporate policies through active tracking of employee completion of PBC and Anticorruption training.</p> <p>The site also requires that all key employees in management, purchasing, those in positions of power with government officials, complete annual declarations where they state conflicts of interest and any invites extended to government officials. Further, invitations to government officials must be pre-authorized by either the employee's boss or the Compliance Officer (depending on the amount) before the event.</p> <p>AC has also implemented improvements to the Conflicts of Interest Management System after detecting in internal Compliance investigations that these were not being adequately documented and managed.</p> <p>Workers expressed an awareness of the annual PBC and Anticorruption training which covers applicable laws and regulations.</p>

		<p>This was confirmed by interviews with management; interviews with workers and contractors; and a review of documents including the Principles of Business Conduct, Business Partner Code of Conduct, anticorruption guidelines, and relevant policies.</p>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>AC's stakeholder engagement follows their written Relationship Plan, which guides site communication with stakeholders to address their concerns, expectations, and needs. The plan is applicable to all stakeholder interactions, conducted mainly by the Corporate Social Responsibility Department, Communication Department and AC Foundation. The site completes stakeholder mapping and tracks all AC Foundation interactions with stakeholders.</p> <p>The site employs an external grievance mechanism and a Stakeholder Perception SOP to manage stakeholder feedback, which can be submitted via phone, email, or website. The Corporate Social Responsibility &amp; Community Development team collaborates with the site to manage and report community grievances, as detailed in the Annual Sustainability Report. Additionally, the grievance mechanisms comply with the UNGP Effectiveness Criteria for Non-Judicial Grievance Mechanisms.</p> <p>External stakeholders are aware of the grievance mechanism. In one instance, a community member contacted the plant manager directly via email instead of using the established grievance mechanism. While the issue wasn't formally logged as a grievance, it was recorded as a risk in the Risk Register.</p> <p>The site effectively adheres to its grievance resolution protocols by promptly investigating, addressing, and resolving the issue.</p> <p>This was confirmed by interviews with management; interviews with workers;</p>

		<p>interviews external stakeholders; and a review of documents including Freeport’s annual report, relevant policies and grievance files.</p> <p>More information is available <a href="#">here</a>.</p>
<p>4. Business Relationships</p>	<p>Fully meets</p>	<p>AC 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 labour policies and practices by joint venture partners, suppliers and contractors, based on risk.</p> <p>A Compliance database and questionnaire are used to screen and assess potential business partners and suppliers, and relevant documents are collected as per Spanish regulation. AC communicates its expectations related to responsible business practices within its contract language, including its Health &amp; Safety, Business Partner Code of Conduct, Anti-corruption, Human Rights, and Social Performance policies.</p> <p>Upon supplier approval, their details are added to online platforms and these systems allow the local supply chain team to monitor suppliers routinely. Quarterly, the team distributes a supplier evaluation questionnaire to supervisors, who rate suppliers on a 0-5 scale across various criteria, including security and compliance. Non-compliance issues trigger an email from the team to the supplier for corrective action, with persistent problems potentially leading to contract termination.</p> <p>AC engages monthly with main contractors to discuss updates and reiterate health, safety, and environmental expectations. While Freeport doesn’t offer specific training on psychological health, its Safe Production Matters strategy emphasizes overall safety, complementing local Spanish mandates</p>

		<p>for periodic risk assessments, last conducted by AC in 2019. All suppliers are briefed on Freeport's Fatigue Management Policy and related safety campaigns.</p> <p>This was confirmed by interviews with management; interviews with suppliers and contractors; and a review of documents including Freeport's annual report, relevant policies, contracts, and documentation regarding ESG due diligence.</p>
5. Child Labour	Fully meets	<p>AC implements the Corporate Human Rights policy, which states that child labour will not be tolerated, and complies with the comprehensive Spanish labour law on the matter.</p> <p>As part of the application process, HR inputs the applicant's date of birth into their system, and has not experienced any instances of underage workers. While the site offers internships for university students, they are above 18 years of age.</p> <p>The youngest worker employed by the site is 21 years old. Employees had not experienced or witnessed an employee younger than the age of 18 working at the site.</p> <p>No underage persons were observed onsite, and staff receive training on the matter.</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>
6. Forced Labour	Fully meets	<p>AC implements the Corporate Human Rights policy, which states that forced or compulsory labour will not be tolerated, and complies with the comprehensive Spanish labour law on the matter. Mechanisms are in place at AC to identify, assess, and eliminate potential employment and human rights</p>



		<p>risks related to forced labour and human trafficking.</p> <p>Worker interviews confirmed they have never been forced to work against their will or witnessed others working against their will.</p> <p>No forced labour was observed onsite, and staff receive training on the matter.</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>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>AC has in place policies, procedures, and practices to ensure they respect employees' rights to freedom of association and to collective bargaining.</p> <p>The site upholds the right to freedom of association and collective bargaining. Employees have neither faced nor observed discrimination or unfair labour practices related to trade union activities, nor have they felt pressured regarding union membership.</p> <p>A valid collective agreement is in place, with ongoing negotiations for a new one. Management and trade unions engage monthly in discussions on health and safety, SOP development, and the internal grievance process, which includes optional employee representation.</p> <p>Trade union representatives confirm a positive and open dialogue with the site.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; site observations; and a review of documents including the collective bargaining agreement and relevant policies, among others.</p>
<p>8. Discrimination</p>	<p>Fully meets</p>	<p>AC's Human Rights Policy states that no form of harassment will be tolerated,</p>

		<p>and policies, procedures and practices are in place to support this.</p> <p>Freeport requires annual training on its Principles of Business Conduct and Guiding Principles, addressing inclusion, diversity, grievance reporting, problem-solving, and policies on discrimination and harassment. The site's Harassment Prevention Protocol includes training on verbal, sexual, and gender harassment. Workers are aware of this training.</p> <p>The site's Internal Reporting Channel SOP aligns with Spanish and EU regulations and connects to related policies. Employees understand the grievance process and are comfortable using it. Contractors are also informed about reporting channels.</p> <p>No evidence of discrimination or harassment was observed on site.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; and a review of documents including the Human Rights Policy, personnel files, and grievance files, amongst others.</p>
<p>9. Gender Equality</p>	<p>Fully meets</p>	<p>AC 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 behaviours that adversely impact women's successful participation in the workplace. AC also complies with national laws, which provide specific guidelines and requirements for companies regarding gender equality plans, equal pay, and measures to prevent and address gender-based harassment and violence.</p> <p>The site's Equality Plan sets out goals with timelines, responsible parties, and monitoring committees to track progress, aiming to boost diversity and</p>

		<p>inclusion via initiatives like joining the CEO for Diversity Alliance, fostering women’s leadership through training programs, and leveraging partially-retired employees in mentorship roles to transfer knowledge.</p> <p>The site reports workforce KPIs in its Non-Financial Information Statement, detailing age, gender, job categories, contract types, remuneration, and health and safety incidents, all categorized by gender. Demographic data are also consolidated in the annual corporate sustainability report. Corporate annually analyses gender pay, finding a nearly equal pay rate with women earning \$0.995 for every dollar men earn.</p> <p>Workers are generally aware of the site's Gender Equality Plan.</p> <p>No discrimination or harassment was observed during the site walkthrough.</p> <p>This was confirmed by interviews with management; interviews with workers; site observations; and a review of documents including the Inclusion and Diversity Policy, Equity Plan, Non-Financial Information Statement, annual sustainability reports and personnel files, among others.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>AC has policies and procedures in place to keep employees' regular and overtime working hours within legally required limits.</p> <p>Under Spanish labour law, the standard workweek is capped at 40 hours, with overtime limited to 80 hours annually. although collective agreements allow for 90 hours. Workers confirmed an understanding of these limits, with HR tracking hours to prevent overages.</p> <p>AC’s ordinary working day is 8 hours, 5 days a week. Any overtime incurred is usually a 4-hour shift as the Collective Agreement states that, "in no case, may the company force the working day of the worker to exceed 12 consecutive</p>

		<p>hours." Overtime requires approval, and is voluntary, with compensation through pay or rest. Contractor hours are overseen by their own firms to comply with legal classifications.</p> <p>Site observations confirm there were no instances of employees working over 60 hours per week. Workers are aware of the policies and express comfort in declining overtime without repercussions.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; and a review of documents including the relevant policies, personnel files, and wage and time records.</p>
11. Remuneration	Fully meets	<p>AC has policies and procedures in place to provide fair wages and abide by national laws.</p> <p>Additionally, corporate performs a living wage analysis for all sites on an annual basis, and employees are paid above the living wage threshold for the area they operate in.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; and a review of documents including the relevant policies, personnel files, and wage and time records.</p>
12. Occupational Health and Safety	Fully meets	<p>AC is ISO45001:2018 group certified and has a functioning Healthy Workplace Management system, focusing on health and safety management. The site also adopts and implements the Corporate Health &amp; Safety policy and aligns with Spain's occupational risk prevention regulations, requiring audits every two years.</p> <p>Annually, or when significant changes occur, the site assesses risks, documents and tracks them with action plans for risks requiring intervention. The site conducts thorough documentation for each risk</p>

		<p>assessment, including task lists, risk assessments, worker information, and preventative measures. Incidents are diligently investigated and analysed, with EY reviewing incident logs and finding no issues.</p> <p>To further address physical health and safety, the site participates in the Corporate Fatal Risk Management Program and monitoring through supervisors meetings with employees, monthly meetings with Directors of each area and monthly contractor meetings. The H&amp;S team utilizes online platforms to record and classify incidents (including near miss incidents and accidents) as well as monitor KPIs used for annual reporting in Corporate's Annual Sustainability Report.</p> <p>In compliance with Spanish law, the site conducts physical and psychological health and safety risk assessments every five years. The latest assessment and national trends have prompted a stronger emphasis on promoting employee well-being. The site offers free online mental health services for employees and their families and implements the "My Healthy Workplace" strategy, certified by a third-party (AENOR).</p> <p>Worker interviews confirm that they received health and safety trainings, including around specific risks related to their jobs. Additionally, an employee praised the site for providing free mental health services and shared their positive experience as a witness in a grievance investigation.</p> <p>Site observations observed safety practices, PPE use, and cleanliness, confirming the site's commitment to a safe working environment.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; and a review of documents including relevant</p>
--	--	---

		policies, incident reports and training documentation.
13. Grievance Mechanism	Fully meets	<p>The site has an internal grievance mechanism in place that allows for both anonymous and named reporting of grievances and is aligned with the UN Guiding Principles' Effectiveness Criteria for Non-Judicial Grievance Mechanisms. Grievances mechanisms include reporting through the Compliance line phone/email/website, Crime Prevention Committee, or supervisor/HR. Contractor companies also receive information about internal reporting channels.</p> <p>Sampled grievances were appropriately received, investigated, and closed in accordance with established processes, with a focus on maintaining confidentiality. No issues were identified.</p> <p>Employees are aware of multiple mechanisms for reporting grievances and most employees understood the grievance process and felt comfortable using at least one reporting mechanism if needed.</p> <p>This was confirmed through site observations; interviews with management; interviews with workers and union representatives; and a review of documents including personnel files, grievance files, and relevant policies.</p>
14. Environmental Risk Management	Fully meets	<p>AC maintains certification of their Environmental Management System under ISO 14001:2015, which includes commitments to the Corporate environmental policy. Additionally, AC implements risk-based controls to avoid/prevent, minimise, mitigate and/or remedy environmental impacts to the natural environment</p> <p>AC has an Emergency Response Plan that is tailored to address the specific risks and challenges associated with the industry. The plan is third-party</p>

		<p>assessed. Additionally, as the site receives copper concentrate from the Huelva Port, they also have an Internal Maritime Plan to establish a contingency plan in the event of a marine pollution event in the river which is overseen by the Spanish Government. The site did have an environmental spill (sulphuric acid) in 2020, which was addressed and cleaned up following their interior maritime plan.</p> <p>Beyond these commitments, the site performs annual risk assessments with risks necessitating action plan being tracked and monitored. Additionally, management and monitoring of air and water quality is conducted regularly.</p> <p>While external stakeholders are not aware of the specifics of the environmental management plan, there is a perception that Freeport has made efforts to improve its public image and is conscious of its impact.</p> <p>External stakeholders expressed concerns were raised about the environmental impact of a new project, but equally expressed positive sentiments about participating in a meeting with the site to learn about the conducted environmental assessments.</p> <p>This was confirmed through site observations; interviews with management, interviews with workers; interviews with external stakeholders; and a review of documents including the ISO 14001:2015 surveillance report, monitoring results, and relevant policies.</p>
<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>AC has implemented an energy management system since 2011, and currently consumes approximately 51% of its electricity from renewable sources or on-site, high-efficiency cogeneration.</p> <p>AC annually measures and reports GHG emissions. AC's reduction targets aim to reduce its absolute Scope 1 and</p>

		<p>2 emissions by 50% by 2030, from the 2018 baseline. This target and progress against that target is reported through Freeport's Annual Report on Sustainability as well as their Annual Climate Report. Additionally, the site tracks and reports its air emissions. AC has established their own internal goal to reach 90% renewable energy by the end of 2030.</p> <p>To achieve emission reduction targets, AC has plans to increase electricity grid decarbonisation and improve heat recovery from process gases and energy efficiency projects. Additionally, the site is considering establishing a Scope 3 emissions objective.</p> <p>This was confirmed through site observations; interviews with management, and a review of documents including the ISO 50001:2018 surveillance report, monitoring results, and relevant policies.</p> <p>More information is available <a href="#">here</a>.</p>
<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>AC annually measures, monitors, and discloses its energy consumption, with public reporting featured in the corporate annual sustainability report. To facilitate this, the site tracks its fuel and energy consumption, primarily focusing on Natural Gas and Electricity. The data undergoes an annual review conducted by both corporate and site-level relevant personnel, including the environmental team. It's worth noting that electricity is the site's largest energy source, primarily used for transporting gases and in the electrolytic refining process, followed closely by natural gas.</p> <p>AC implements policies and procedures around the recovery, re-use, and recycling of energy, natural resources, and materials, which is also reflected in the mines regulated closure plan.</p>



		<p>This was confirmed through site observations; interviews with management; and a review of documents including the ISO 50001:2018 surveillance report, monitoring results, and relevant policies.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>AC implements water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>The site's Risk Register includes a risk related to groundwater contamination, specifically related to metals. This risk has two components. The first part of the risk is attributed to legacy groundwater contamination within the site's boundaries, which existed prior to Freeport's ownership of the facility and the enactment of groundwater contamination legislation. AC monitors the contamination to ensure it remains stable, which is annually reviewed by a third-party contractor.</p> <p>The second aspect of the risk pertains to the potential for contamination to migrate beyond the site's boundaries. The site has an action plan in place to address this risk, and annual reporting on the progress is submitted to Corporate Freeport.</p> <p>Specific procedures and inspections are carried out to prevent soil contamination, and any spills are internally investigated and reported to management.</p> <p>AC also has initiatives aimed at reducing freshwater consumption and achieving zero discharge into the water environment. Complete and ongoing projects contributing to this goal include, conversion of the ceramic filter electric furnace from wet to dry base technology, establishment of a new</p>

		<p>wastewater treatment plant, resulting in a significant reduction in metal load discharged, and implementation of a future effluent adaptation plant.</p> <p>The site only has one discharge point, which undergoes regular water quality monitoring, with samples collected every two weeks by the local administration and monthly by a third-party contractor to ensure compliance with local regulations and safeguard the river environment.</p> <p>This was confirmed through site observations; interviews with management, interviews with external stakeholders; and a review of documents including relevant policies, monitoring data and annual sustainability reports.</p>
18. Waste Management	Fully meets	<p>AC applies the mitigation hierarchy to manage releases and waste and address potential impacts on human health and the environment. Additionally, AC assess the hazards of the products of mining according to relevant regulatory systems and communicate through safety data sheets and labelling as appropriate.</p> <p>The site also maintains ISO 14001:2015 certification for its Environmental Management System, which aligns with the Corporate environmental policy.</p> <p>Upon reviewing the AC's risk register EY identified one environmental-related risk concerning waste management. The risk pertained to a potential “significant increase in waste production or increased difficulty in waste disposal.” In response to this risk, AC initiated a project aimed at reducing neutralization cake waste, which accounted for approximately 60% of their hazardous waste due to its arsenic content. Since the implementation of this project in 2019, the site has successfully reduced cake waste by 34%. Additionally, the site</p>

		<p>explored technological alternatives for the potential vaporization of specific waste types, such as waste from the ceramic filter, which contains a high zinc content. This waste is now transported on a monthly basis to a vaporization plant in Belgium for zinc recovery.</p> <p>Furthermore, in 2020/2021, the site constructed a new waste warehouse, enhancing waste segregation practices. Weekly inspections are conducted to ensure proper segregation. The site follows a comprehensive Waste Management Procedure and a Hazardous Waste Management Plan, both of which undergo regulatory approval and are documented through an approval document.</p> <p>Sustainable development activities are integrated into the project life cycle through the Management of Change process.</p> <p>This was confirmed through site observations; interviews with management, interviews with workers; interviews with external stakeholders; and a review of documents including the ISO 50001:2018 surveillance report, safety data sheets, monitoring results, and relevant policies.</p>
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	<p>AC applies the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment. AC conducts regular environmental monitoring and reports annually on waste, water and air quality metrics.</p> <p>The site maintains certification of their Environmental Management System under ISO 14001:2015, which includes commitments to the Corporate environmental policy, including 'Contributing to the conservation of nature and implementing the mitigation</p>

		<p>hierarchy to assess risks and impacts to nature' and 'Preventing pollution and minimizing adverse environmental impacts where practicable, using risk management strategies based on sound science.'</p> <p>A pollution related risk identified in AC's risk register pertains to air emissions, specifically the risk of exceeding the legal limits on air emissions. This risk was added following the issuance of a new environmental permit in 2021, which imposed stricter emissions limits for non-ferrous metal activities. The site highlighted concerns regarding dust and SO2 emissions in relation to this risk, and have implemented projects aimed at reducing these emissions.</p> <p>Although external stakeholders do not oppose the CirCular Project concept (a new facility where they will be processing scrap e-waste) they are concerned about its potential environmental impact. These concerns are part of discussions with the site.</p> <p>This was confirmed through site observations; interviews with management, interviews with workers; interviews with external stakeholders; and a review of documents including the ISO 14001:2015 surveillance report, monitoring results, and relevant policies.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Fully meets</p>	<p>AC assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no net loss of biodiversity.</p> <p>The site employs a management of change (MOC) process for all new or significant projects, which includes detailed assessments of their impact on biodiversity. This process involves evaluating whether the changes could lead to increased risks or negative impacts, including a potential net loss of biodiversity. If any adverse impact on biodiversity is identified, additional</p>

		<p>information is required, and the mitigation hierarchy is applied, as integrated into the MOC forms. The MOC undergoes presentation, review, approval, and may be subject to internal audits. It's worth noting that, as part of regular risk register updates occurring quarterly, there were no identified risks related to biodiversity.</p> <p>Additionally, the site considers biodiversity and its potential impacts during the environmental assessment process conducted for environmental permitting.</p> <p>This was confirmed through site observations; interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including monitoring results, and relevant policies.</p>
<p>22. Mine Closure and Reclamation</p>	<p>Not applicable</p>	<p>This criterion is not applicable to non-mining operations.</p>
<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>AC implements risk-based controls to prevent, minimise, mitigate and/or remedy physical and psychological health and safety and environmental impacts to local communities, based upon recognized international standards. Additionally, the site develops, maintains, and tests emergency response plans, collaborating with external stakeholders when risks are significant.</p> <p>Air and water quality are managed and monitored. Internal stakeholders have received training on handling accidental discharges.</p> <p>Community members express that AC demonstrates and maintains a good relationship with the community, and that they had no doubt that AC would undergo measure to reduce the environmental impact of their activities.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of</p>

		documents including relevant policies, stakeholder map, and grievance files.
24. Community Development	Fully meets	<p>AC has policies in place to enable access by local enterprises to procurement and contracting opportunities across the project life cycle, both directly and by encouraging larger contractors and suppliers, and by supporting initiatives to enhance economic opportunities for local communities.</p> <p>Furthermore, AC implements inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate.</p> <p>AC aims to procure locally first and whenever possible. Local suppliers are able to contact them through the Atlantic Copper website, and tag the message/request specifically to the supply chain department.</p> <p>Additionally, AC is a member of The Association of Chemical, Basic and Energy Industries of Huelva. This group is configured as a meeting place between the companies that make it up, for the development of common activities and rapprochement and integration into the society in which it is based. One of its main objectives is to connect the associated companies with each other and establish relationships with the administrations and society.</p> <p>The Atlantic Copper (AC) Foundation, established in 2009 as a not-for-profit organization, is an extension of the site's long-standing commitment to social engagement. This foundation orchestrates the site's external social responsibility efforts, adhering to its charter while funding various initiatives under key themes such as education, social projects, sports, culture and historical heritage, and environmental</p>

		<p>conservation. The AC Foundation actively engages with stakeholders applying for financial aid or other support, focusing on mutually shared objectives, but also remains open to funding proposals outside its primary themes. Initially, the site communicated the Foundation's mission to the local community, seeking their input on needs and projects for consideration. In 2022 alone, the Foundation funded over 30 agreements.</p> <p>Every three years, the site commissions a third-party to conduct public perception surveys. These surveys involve approximately 400 phone calls to residents of the surrounding towns, along with specific interviews with local leaders, aimed at gauging public opinions. The most recent survey, conducted in 2022, revealed a significant improvement in the public's perception of Atlantic Copper. The company was recognized as the top-ranked entity for its investments in socio-charitable, cultural, sports, environmental, and educational initiatives.</p> <p>External interviews stated that AC's efforts to continually improve public perception and engage with the community have been recognized and valued.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of documents including relevant policies, stakeholder map, and grievance files.</p>
25. Artisanal and Small-Scale Mining	Not applicable	The assessment confirms there is no ASM in the area of influence of Atlantic Copper.
26. Human Rights	Fully meets	Policies and practices are in place at AC to support the UN Guiding Principles on Business and Human Rights, undertake human rights due diligence and provide for or cooperate in processes to enable the remediation of adverse human rights impacts that

		<p>the company have caused or contributed to. Employees and contractors receive mandatory training on the matter, and yearly completion is tracked and reported in the Annual Report on Sustainability.</p> <p>Mechanisms in place to assess potential and actual human rights risks and impacts, primarily follow corporate guidelines and policies, such as the Responsible Sourcing Policy. Per AC's most recent Non-Financial Information Statement, no relevant risks have been identified with respect to compliance with human rights at AC.</p> <p>AC have an external grievance mechanism in place that's aligned with the UNGPs.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; online research; and a review of documents including the Principle of Business Conduct, grievance files and relevant policies.</p>
27. Security and Human Rights	Not applicable	<p>AC does not have its own security staff. Private Security firms in Spain are authorized by the Government and receive their own training regarding human rights.</p> <p>AC has been evaluated by an independent third party in relation to its environmental, social and corporate governance (ESG) behaviour, since 2019. In the last evaluation of 2022, it has consolidated the highest possible degree (Advanced ) and improved its overall score.</p>
28. Indigenous Peoples' Rights	Not applicable	<p>The assessment confirms that AC carries out its activities in Huelva (Spain), in an area in which there are no Indigenous Peoples.</p>
29. Land Acquisition and Resettlement	Not applicable	<p>The assessment confirms that AC is not engaged in activities of land acquisition and resettlement, and has no future plans to do engage in those activities.</p>



<p>30. Cultural Heritage</p>	<p>Fully meets</p>	<p>AC implements risk-based controls to prevent, minimise, mitigate and/or remedy impacts to cultural heritage sites based upon a recognised international standards.</p> <p>There were no cultural heritage issues identified during the assessment. AC is on the port which is designated industrial land, and all surrounding facilities/direct neighbors are also industrial.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including stakeholder mapping of AC, relevant policies, Social and Environmental Management Reports and descriptions of social development projects.</p>	
<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>Atlantic Copper has a medium complexity supply chain, with mineral sources coming from more than a dozen mines, some of which belong to the parent company, Freeport McMoRan Inc. (Freeport). Atlantic Copper’s sourcing is made up primarily of concentrates (90%), but also includes copper scrap, copper sheets, and occasional anode purchases.</p> <p>Freeport is primarily responsible for overseeing the due diligence efforts on potential and ongoing suppliers. The site follows the guidance of the corporate <a href="#">Responsible Sourcing of Minerals Policy</a> and the Responsible Sourcing of Minerals standard operating procedures.</p>	
	<p>31.a. Management System</p>	<p>Fully meets</p>	<p>Within Freeport, Atlantic Copper is classified as a “level 2,” meaning, a site that does not operate in a CAHRA but frequently sources and processes external materials. Based on this classification, Atlantic Copper receives awareness training of the Responsible Sourcing of Minerals Policy, as well as the Due Diligence program.</p>

			<p>In addition to the policy and SOP, the corporate-driven system is also supported by supplier questionnaires, a CAHRA identification tool, and training to support implementation.</p> <p>The system is overseen by the Sustainability Leadership Team at corporate level and implemented by the Responsible Production Frameworks and Sustainability Department. There is a procedure to control materials and equipment entering and exiting the facility.</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>This was confirmed through interviews with management; interviews with relevant site-level workers; facility walkthrough; and a review of documents including the policy, procedure, CAHRA tool, sampled supplier files, and risk assessment supporting information.</p>
	<p>31.b. Red Flag Identification Process</p>	<p>Fully meets</p>	<p>At corporate level, there is a process in place to collect, review, and retain supplier information that is in requirement with the standard. For each supplier, Freeport collects and retains information to determine the identity, nature and legality of the suppliers' business operations and reviews such information. The company uses the Freeport Compliance Exchange (FCeX) as the company's online due diligence platform. Sites are required to issue a risk assessment questionnaire to new suppliers, which suppliers must complete to be</p>

			<p>approved as business partners. All existing suppliers must complete the survey again on either an annual or a tri-annual basis thereafter, depending on their risk profile.</p> <p>In addition to questions regarding the supplier, there is information that is obtained about the materials to be sourced including but not limited to: the type of material (concentrate, anode, cathode or recycled material and quantities to be purchased expressed in volume or weight.)</p> <p>There is a documented procedure to identify CAHRAs using the International Copper Association’s “TDi Copper Due Diligence Tool” (TDi Tool). In the TDi Tool, Freeport determines if a risk flag is present due to material origination or transit through a CAHRA as defined by the indices and thresholds set in the TDi Tool. The tool is consistently implemented, using credible resources. Results are documented.</p> <p>One red flag related to origin of material was identified during the assessment period.</p>
	<p>31.c. Risk Assessment Process</p>	<p>Fully meets</p>	<p>At corporate level, the responsible sourcing team conducts due diligence and risk assessment reviews on sources that raise orange and red flags. The due diligence process can include desk research, reviewing online human rights and environmental data sources, consulting with the Human Rights and Compliance teams and company advisors, when necessary, external expert profiles (TDi contract), engaging with the Trader or Supplier directly, conducting on-the-ground assessments if necessary and evaluating the Supplier’s due diligence program.</p> <p>On-the-ground assessments are conducted when there are data gaps due to lack of sufficient and credible information to determine the presence of Annex II risks or when determined necessary by the committee. When</p>

			<p>conducting on-the-ground assessments the assessment team will consult with relevant, including affected, stakeholders if applicable.</p> <p>The risk assessment for material from a red flagged location did not result in the presence of Annex II risks.</p>
	31.d. Risk Management Process	Fully meets	<p>Freeport's approach includes exercising influence over Suppliers through engagement and collaboration. Examples include utilizing direct suppliers' due diligence in addition to their own, receiving updates on their efforts to mitigate identified risks, continuing to monitor allegations through periodic desktop research and review of local media sources and sharing management systems and best practices to encourage continuous improvement of their operations. For some sources they also limit or change agreements from long-term to smaller, spot contracts to allow for purchasing flexibility while they collect and evaluate more information.</p> <p>The risk assessments Freeport conducted for Atlantic Copper during the assessment period did not confirm the presence of risks of adverse impacts as listed in the OECD Guidance Annex II and therefore no risk management plans were implemented.</p> <p>In other examples outside of the assessment cycle, Freeport implemented risk mitigation actions that included communicating the assessment findings to the red-flagged supplier, encouraging them to develop and implement measures to fill identified gaps.</p>
	31.e. Public Reporting	Fully meets	<p>Freeport's corporate Step 5 report includes Atlantic Copper and covers all elements of the standard and reviewed by the assessors.</p> <p>The report is available <a href="#">here</a>.</p>

<p>32. Transparency and Disclosure</p>	<p>Fully meets</p>	<p>At the corporate level, Freeport-McMoRan annually reports on sustainability, including site-level information about AC.</p> <p>AC publicly support 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.</p> <p>More information is available <a href="#">here</a>.</p>
--	--------------------	---

### Conclusions

Statement of conformance	
<p>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.</p>	<input checked="" type="checkbox"/>
<p>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 2024.</p>	<input type="checkbox"/>
<p>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 18 September 2024.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>
<p>Limitations:</p>	
<p>Additional comments:</p>	

## 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	27 February 2024
Expiry Date of The Copper Mark and The Nickel Mark	26 February 2027