



The Copper Mark Summary Report

Participant Information

Name of the Site	División El Teniente
Unique identifier provided by the Copper Mark	P0034
Address	Millan 1040, Rancagua
Country of Operation	Chile
Copper products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper concentrate Copper anode Molybdenum
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper, molybdenum
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, molybdenum
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 checked="" type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input type="checkbox"/>
Other (<i>please explain</i>)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>

Rails	<input checked="" type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	

Equivalent Systems

The following equivalent systems were applied:

Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the [Copper Mark Recognition Process](#).

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

Independent Site Assessment Information

Name of the Lead Assessor	Elanne Almeida
Name of the Assessment Firm (if applicable)	EY
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	<p>29 July 2022 – 4 November 2022</p> <p>Site visit: 12-13 October 2022</p> <p>Follow up assessment: 1 December 2023 – 1 February 2024</p>

Assessment Period	1 January 2022 – 31 October 2022
Summary of the Assessment Methodology	<p>EY used ISAE 3000 to apply reasonable assurance to the self-assessment provided by the site. Through site-level testing, document analysis, and interviews, the assessors identified the level of adherence to the 32 Copper Mark Criteria.</p> <p>The assessment was carried out through the following:</p> <ul style="list-style-type: none"> • Preparation <ul style="list-style-type: none"> ○ Opening meetings with Casa Matriz (HQ) and mine site “División El Teniente” (DET) personnel ○ Assessment of criteria requirements ○ Risk assessment in the context of DET. ○ Development of an assessment plan and focus areas. • Execution <ul style="list-style-type: none"> ○ Document review including policies, procedures, data, and other relevant evidence. ○ Virtual meetings with management of DET and Casa Matriz to understand the processes and existing activities to meet the expectations of the criteria. ○ Site visit including interviews with workers and local stakeholders. ○ Comparison of the results of the self-assessment and evidence reviewed. ○ Discussions on different ratings, gaps, and corrective action plans • Conclusion <ul style="list-style-type: none"> ○ Review of the self-assessment ○ Draft report ○ Final discussions with DET and Casa Matriz teams <p>Full time employees: 3,845 Contractors: 2,979</p>
Summary of the Assessment Activities	<p>In addition to the above, the following activities took place on site:</p> <ul style="list-style-type: none"> • Visits to Edificio Recursos hídricos en Barahona, Bocatoma Confluencia, Tranque Barahona, Casino Colón Alto, Electrolinera, Planta concentradora Colón Bajo, Centro de Manejo de Residuos Industriales Sólidos (CMRIS), Planta de Abatimiento de Molibdeno (PAMO), Muro Embalse Carén y zonas de compensación forestal Embalse Carén. Las comunidades visitadas fueron APR Hijuelas de Pincha, APR

	<p>Rinconada de Doñihue, Asociación de Crianceros de Macal, JJVV El Guindal, JJVV El Llano y Pirquineros de Pelequén.</p> <ul style="list-style-type: none"> • Interviews with management • Interviews with workers • Interviews with local stakeholders • Document review
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>División El Teniente (DET) has a process to comply with legal requirements that includes a matrix of compliance with relevant requirements, means of verification, internal audits, and an internal platform that allows workers to access policies and procedures required for compliance.</p> <p>This was confirmed through interviews with management, interviews with workers who are able to identify the laws applicable to their positions and where to find them and have received training, a site walkthrough to see how applicable laws are publicly communicated, and a review of documents including a legal subscription, internal audit reports, and the compliance matrix.</p>
2. Business Integrity	Fully meets	<p>At the corporate level, CODELCO has a code of business conduct that prohibits practices that are anti-competitive or illegal. There are a series of procedures that prevent bribery, corruption, facilitation payments, and other criminal behavior. These are confirmed to apply to DET.</p> <p>This was confirmed through interviews with management, interview with a worker who mentioned that some need to complete a declaration of conflict of interests, and review of documents including the code of conduct, commercial ethics policy, and the conflict-of-interest declaration.</p>
3. Stakeholder Engagement	Fully meets	<p>At the corporate level, CODELCO has tools and norms to establish the procedures to map stakeholders and define plans for engagement.</p> <p>DET has a stakeholder map that is regularly updated by the team, relationships with the stakeholders in the areas of influence, and a grievance mechanism in line with the UN Guiding</p>

		<p>Principles Effectiveness Criteria for Non-Judicial Complaint Mechanisms.</p> <p>This was confirmed through interviews with management, interviews with workers, interviews with community representatives who stated a constant and present relationship with DET’s community team, and a review of documents including the corporate tools and guidance, the stakeholder map, records of grievances from the platform, and the community development plan.</p> <p>More information available here.</p>
4. Business Relationships	Fully meets	<p>At the corporate level, CODELCO has a set of rules and procedures that DET uses in commercial relationships, including a code of conduct, manual of scope and powers, and the Single Procurement Process. CODELCO reviews its contractors monthly to assess strengths and weaknesses, impacts, and mitigation activities for elements in the code of conduct.</p> <p>It is recommended to define an annual workplan with suppliers and business partners to address all responsible business practices DET is looking to promote. Current engagement is focused on certain areas (e.g., occupational health and safety) more than others.</p> <p>This was confirmed through interviews with management, interviews with suppliers, and a review of documents including the supplier code of conduct, contracts with suppliers, and supplier risk evaluations.</p>
5. Child Labor	Fully meets	<p>DET has implemented policies and controls that ensure that there is no employment of minors under 18 years of age or exposure to hazardous work. For example, there are controls to check and confirm age in the recruitment and hiring processes.</p> <p>Worker interviews corroborate that no children under the age of 18 are employed.</p> <p>No children were observed on site.</p> <p>This was confirmed through interviews with management, interviews with workers, site observations, and a review of documents including the code of conduct, contracts with suppliers, and the annual sustainability report.</p>
6. Forced Labor	Fully meets	<p>DET has policies and practices in place to prohibit forced labor and human trafficking. Workers confirm</p>

		<p>they are not exposed to forced labor. Site observations do not reveal a forced relationship between workers and the company. Documents are not withheld.</p> <p>This was confirmed through interviews with management, interviews with workers, site observations, and a review of documents including the code of conduct, internal rules on health and safety, and the annual sustainability report.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>DET has a management system to guarantee the rights of employees to freedom of association and collective bargaining in line with the relevant ILO conventions. The last union negotiations took place in August 2021 with five unions. Workers state they are free to join or not join unions.</p> <p>This was confirmed through interviews with management, interviews with workers, interviews with a union representative, and a review of documents including internal guidance on freedom of association and collective bargaining, collective bargaining agreements, and the annual sustainability report.</p>
8. Discrimination	Fully meets	<p>At the corporate level, CODELCO has policies, practices and procedures that provide clear guidelines on non-discrimination, inclusion, and equal opportunities in line with the ILO Conventions. There are trainings at the corporate and site level and with suppliers that addresses issues of discrimination prevention and diversity. There is also a fully functioning complaints system.</p> <p>Workers stated they were aware of the policies and procedures and had not observed instances of discrimination and are aware of the channels to submit a grievance. On site, there are posted signs related to Chilean law regarding practices of good treatment (“Decálogo de buen trato.”)</p> <p>This was confirmed through interviews with management, interviews with workers, interviews with service providers, site observations, and a review of documents including the code of conduct, policies, human resources policies, and internal manual on health and safety.</p>
9. Gender Equality	Fully meets	<p>At the corporate level, CODELCO has inclusion policies and practices that include gender. There are initiatives to promote gender equality at the site-level.</p>

		<p>Workers state an equal opportunity workplace.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the diversity and inclusion policy, information on gender equality initiatives, and the code of conduct.</p> <p>It is recommended to implement measures to monitor the impact of gender equality initiatives on the perception of workers.</p>
10. Working Hours	Fully meets	<p>DET has implemented policies, procedures, or practices to maintain normal working hours, ensure no overtime and legal limits are maintained required for the workload (no more than sixty hours a week) through shift work.</p> <p>This is confirmed through interviews with management, interviews with workers, and a review of the shift record system in SAP, among other documents and records.</p>
11. Remuneration	Fully meets	<p>DET has a remuneration management system with policies and practices to pay workers equal to or above the national minimum wage and the minimum living wage. DET carries out studies to meet the average salary of the industry at the local level. Collective wages are negotiated through the collective bargaining agreement process and include defined employment growth opportunities and salary bands, as well as benefits.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the policy for life quality, pay slips, and internal guides for pay processes.</p>
12. Occupational Health and Safety	Fully meets	<p>DET has a management system for occupational health and safety that meets international guidance and best practice, such as ISO-45001/2018. It includes clear responsibilities and operational expectations aligned with corporate strategy and core values of the mining business.</p> <p>Site observations corroborated the proper use of personal protection equipment (PPE), proper signage in case of fire or earthquakes, notifications when entering restricted areas, and signage for health and safety generally. There is a list of accidents at DET, which is in progress for 2022.</p> <p>This was confirmed through the site walkthrough, interviews with management, interviews with workers who were able to explain the processes and</p>

		<p>procedures, interviews with suppliers and external stakeholders, and a review of documents including the health and safety policy, the procedures, and the system to manage risks.</p>
13. Grievance Mechanism	Fully meets	<p>At the corporate level, CODELCO has policies and procedures in place to maintain a grievance mechanism accessible to all workers, including DET. The mechanism may be used anonymously, and workers state there is no disincentive to use it. External, independent consultants assist with grievance management for complaints related to labor conditions. A review of grievances is part of the internal audit process.</p> <p>This is confirmed through interviews with management, interviews with workers, and a review of documents including the website and a sampling of complaints lodged along with the responses.</p>
14. Environmental Risk Management	Fully meets	<p>The assessment confirmed DET has a valid ISO 14001 certificate.</p>
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>At the corporate level, CODELCO collects, analyzes, and public reports on carbon emissions that include those of DET using an internationally recognized protocol (the GHG protocol). There are reduction targets in place for scopes 1 and 2, with work started in 2022 to define targets for scope 3. In 2022, CODELCO began work on a GHG measurement tool for suppliers.</p> <p>These are supported by corporate and division level initiatives such as moving to renewable energy contracts, replacement of a fleet of employee transport vehicles by electric buses, and a project for electromobility of operations and fleets.</p> <p>This was confirmed through site walkthrough, in which the system implemented to warn against high energy consumption in operations was verified, interviews with management, interviews with workers, and a review of documents including the sustainability report, register of emissions, and sustainability commitments.</p> <p>More information here and en español.</p>
16. Energy Consumption	Fully meets	<p>DET has programs to reduce energy consumption and/or energy intensity, improve energy efficiency, and increase the use of renewable energy.</p>

		<p>DET publishes, at least once per year, quantitative data on energy efficiency performance and energy consumption.</p> <p>Some initiatives include replacement of a fleet of employee transport vehicles by electric buses, and a project for electromobility of operations and fleets. CODELCO announced in October 2022 the goal to move to 100% renewable energy by 2026.</p> <p>This was confirmed through site walkthrough, interviews with management, interviews with workers who understood the basic sustainability policy, and a review of documents including the baseline study for energy, sustainability commitments, and the manual on energy efficiency.</p>
17. Freshwater Management and Conservation	Fully meets	<p>At the corporate level, CODELCO has a 5-prong strategy to manage freshwater, including governance, water efficiency, innovation and new sources, management of leaks and discharges, and assurance of the use of sustainable sources. Each prong is reviewed with DET on a monthly basis. The risk department follows up monthly on water supply and risk levels. DET considers the water risk as critical.</p> <p>As part of its management of the issue, DET is part of the Cachapal River Surveillance Board, where it engages on work related to the care of water and resource consumption management.</p> <p>This was confirmed by the site walkthrough, including a visit to the Water Resource Building where DET monitors the flow and use of water through technology, interviews with management, interviews with workers, interviews with stakeholders, and a review of documents including the environmental impact assessment plans for water, water strategy, notes of participation in the surveillance board, and sustainability report.</p>
18. Waste Management	Fully meets	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>DET classifies and manages hazardous and non-hazardous waste. This includes sales activities for scrap metals, recycling, and reuse of other waste. The procedures documenting these processes make direct reference to the waste hierarchy.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> • The waste hierarchy is not implemented, in particular related to the reduction and reuse of

		<p>waste at the source. There is no effective strategy to reduce waste generation in the case of maintenance activities.</p> <p>This was confirmed through site walkthrough at the waste treatment facility, interviews with management, interviews with workers who know the waste management policy, and a review of documents including the waste management procedure, procedure for hazardous and non-hazardous waste, mitigation efforts for waste management, and the policy that covers the mitigation hierarchy.</p> <p>The follow up assessment confirmed there are tactical implementation plans (“PIT”), comprised of actions to support the circular economy goals of the site and the principles of the mitigation hierarchy, not previously implemented. DET has created a ‘circular economy’ administrative unit to implement the corporate circular economy strategy and accelerate execution of the PIT and provided time bound objectives that indicate progress towards the 2030 goal.</p> <p>Documentation through December indicates that a 40% reduction in waste generation was achieved in 2023, with a trend line, based on PIT actions, which includes the principles of the mitigation hierarchy, extending to 2030 and an overall valorization of 65%.</p> <p>The follow up assessment verified regarding the plant and general maintenance departments’ activities as related to the site Circular Economy Unit’s integration into the routine planning activities of these areas, the establishment of recycling facilities within the departments’ work areas, and illustrative projects that have reduced waste stream volumes.</p>
<p>19. Tailings Management</p>	<p>Fully meets</p>	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>DET has a system in place to manage tailings that includes dedicated resources for the identification, evaluation, and control of potential risks to the physical and chemical stability of deposits; periodic evaluations of technological innovation opportunities for the tailings deposit; periodic reviews of impacts, engagement with the affected communities, and development of emergency preparedness plans.</p>

		<p>DET's system is aligned with the norms of the Global Industry Standard for Tailings Management (GISTM). As of the first assessment, DET had begun the implementation of and has completed approximately 50%. DET has developed a two-year work plan to achieve full implementation.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> • The GISTM has not been fully implemented. <p>This was confirmed by interviews with management, interviews with workers, site observations of the tailings dam, and a review of documents including sustainability commitments and the gap analysis of DET against the GISTM.</p> <p>The follow up assessment in January 2024 confirmed that all tailings management facilities at DET are categorized under the GISTM as 'very high' or 'extreme' and a disclosure of Meets for all 77 GISTM requirements was required by 23 August 2023.</p> <p>Codelco have tracked the implementation of GISTM since 2021 for all their tailings facilities and have used a third-party consultant to provide a progressive assessment of conformance, against the GISTM Conformance Protocol. The last review on 2nd August 2023 concluded that all requirements 'Meet' the intent of the GISTM conformance protocols. The conclusion identified certain GISTM requirements relating to principles 13 and 14 of GISTM that 'Meets with a Plan.'</p> <p>The Copper Mark does not have "meets with a plan" within its assurance process. Therefore, the facts were reviewed to determine if this rating corresponds to fully meets or partially meets within the Copper Mark performance levels.</p> <p>Regarding Principles 13 and 14, the assessors verified that Codelco has undertaken substantial engagement with potentially affected communities and other relevant stakeholders for all related tailings facilities. This has included sharing credible failure information in the form of inundation maps and current Codelco Emergency Preparedness and Response Plans (EPRP) and undertaking emergency response simulations. A GISTM gap exists relating to the completion of Risk Maps and finalisation of emergency plans under Chilean regulations. The finalisation of these aspects lies with the National Disaster Prevention and Response</p>
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		<p>Service and not with Codelco, so a detailed plan with timelines cannot be determined by Codelco. For these aspects, Codelco continue to engage with the regulators.</p> <p>As a result, the assessors have concluded that these align to “fully meets,” within the Copper Mark definitions.</p>
20. Pollution	Fully meets	<p>CODELCO has a policy to minimize, reduce and compensate the effects of pollution on life and the environment, including mitigation measures. DET is certified to ISO 14001, which includes elements of pollution.</p> <p>At DET, there are mitigation measures in place in accordance with the mitigation hierarchy.</p> <p>It is recommended that DET continue find ways to increase the efficiency of its mitigation measures, always seeking to reduce polluting agents based on the risk of exceeding the standard.</p> <p>This is confirmed through interviews with management, interviews with workers who knew the pollution policy, site walkthrough, and a review of documents including the sustainability commitments, the evaluation of pollution risks, and the sustainability report.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>DET implements the mitigation hierarchy to avoid, minimize, reduce, and offset adverse impacts on biodiversity. At the corporate level, CODELCO commits to protect the environment, biodiversity, and ecosystems through preventive risk management. There are corporate procedures and regulations for the management of biodiversity in operating sectors and action protocols in the event of possible damage.</p> <p>At DET, this is implemented through a variety of activities. Before carrying out an investment project and throughout its entire life cycle, the potential risks in operational, safety and environmental matters are analyzed in order to prevent their potential impact.</p> <p>DET conducts training for workers and members of the community in relation to sighting procedures of fauna, procedures for cutting, brushing, and pruning vegetation and talks associated with biodiversity and the importance of territories, among other mitigation efforts.</p> <p>Examples of efforts taken include implementation of road signs, speed control, closure of tunnels where</p>

		<p>bats may be affected by operations, protection in power lines, an app to report fauna sightings, and an agreement with a university for the implementation of animal rehabilitation and forest restoration measures.</p> <p>This is confirmed through interviews with management, interviews with workers, interviews with community members, site walkthrough and local observations, and a review of documents including the corporate sustainability policy, a mapping of protected areas, and the biodiversity impact assessment.</p>
22. Mine Closure and Reclamation	Fully meets	<p>DET has published its mine closure plan (2015, updated in 2021) on the National Geology and Mining Service platform. It includes legally required considerations for financial provisions for the restoration and compensation associated with closure, as well as evaluation of the potential impacts to communities and other stakeholders.</p> <p>The mine closure plan has been evaluated and accepted by the relevant authorities.</p> <p>This is confirmed through interviews with management, interviews with community representatives, and a review of documents including the mine closure plan, the report by the government authority (SERNAGEOMIN), and the corporate sustainability commitments.</p>
23. Community Health and Safety	Fully meets	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>DET addresses health and safety of the communities in the area of influence through monitoring for compliance with environmental regulations. They have in place the Coya Health Agreement and the Alhué Comprehensive Medical Agreement, to promote the health of the communities.</p> <p>Three gaps were identified:</p> <ul style="list-style-type: none"> • The Emergency Plan for the Carén reservoir is not complete. • There is no assessment on the impacts that could be caused by DET including mental health, demands on the health and sanitation infrastructure, and/or the spread of diseases by workers and/or diseases that could be caused by environmental contamination.

		<ul style="list-style-type: none"> • There is no specific management plan that has been developed in collaboration with affected stakeholders to avoid, minimize, reduce, and compensate the potential impacts on the health and safety of communities as a result of DET's projects throughout its lifecycle. <p>This was confirmed by interviews with management, interviews with local communities, observations from visits to local areas, and a review of documents including evaluation of risks to health and safety, mitigation efforts to avoid or minimize community health and safety risks, procedure to receive and respond to grievances.</p> <p>The follow up assessment in January 2024 confirmed that the Caren Emergency Preparedness and Response Plan, including sharing credible failure information in the form of inundation maps and current Codelco emergency preparedness and response plan, and undertaking emergency response simulations.</p> <p>The follow up assessment also confirmed that DET has completed an assessment of community health status and 'socio-territorial' risks. The latter include risks from 'possible environmental contamination' posed by DET operations for which the inherent risk score was 'high'. The analysis concluded that, with current management controls in place, residual risks to health from operations were of the lowest likelihood and second lowest consequence. Given the inherent score however, DET elevated the community health risk to the corporate risk management system ('Directic').</p> <p>The <i>Diagnostic</i> therefore addressed topics such as existing health infrastructure and common illnesses. It should be noted that the conduct of health surveys and identification of health needs is the purview of relevant public health sector agencies in Chile. Therefore, and though funded by DET, the health survey was led by independent contractors under the direction of local health authorities, without an overt presence of Codelco.</p> <p>Results from this effort will be used to identify public health investments in the DET area of influence.</p> <p>Finally, the follow up assessment also confirmed additions to procedures to require ongoing assessment of social and territorial risks as a part of annual community management plans. Procedures</p>
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		<p>were also updated to reinforce the use of a risk assessment procedure that requires analysis of project and operational risks to local populations. DET has held meetings with each of its local communities to characterize their health status in anticipation of developing health management plans.</p> <p>These plans will be developed in consultation with these communities,. While the initial meetings were financed by DET, they led by 3rd party expertise and local health officials.</p> <p>This was confirmed through interviews with management; interviews with communities; and a review of the revised or new documents.</p>
<p>24. Community Development</p>	<p>Fully meets</p>	<p>At the corporate level, CODELCO has a standard and tools to gather input on community needs and develop a community plan, to be implemented by DET during the first quarter of each year. There is a community relationship management system regularly updated by the community engagement team and allows for monitoring and compliance management on community relations.</p> <p>DET has carried out a survey of needs and has a Community Plan with budget, objectives, and activities for four main areas: strengthening of the local economy; education and social capital; environmental sustainability; new model of community relations.</p> <p>In total, there are 16 social initiatives in different locations in the area of influence underway.</p> <p>There was a recommendation that DET evaluate or otherwise measure the impact of the initiatives.</p> <p>This was confirmed through interviews with management, interviews with community representatives who stated the ongoing activities, and review of documents including the corporate policy for community development, stakeholder mapping, registry of community development initiatives, and community needs evaluation.</p>
<p>25. Artisanal and Small-Scale Mining</p>	<p>Fully meets</p>	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>DET has started relationships with groups of artisanal miners in three locations within the area of influence. In one location this includes a including a working group to develop a circular economy</p>

		<p>project, work on health and safety issues, and provide tools and PPE to the artisanal miners.</p> <p>Two gaps were identified:</p> <ul style="list-style-type: none"> • DET has not carried out an assessment to identify the presence of other associations and/or groups related to ASM in the area of influence. • DET has not yet developed specific policies and procedures to involve ASM in formalization and capacity building for their environmental and social practices. <p>This was confirmed through interviews with management and interviews with one of the ASM organizations.</p> <p>The follow up assessment confirmed a report with the results of a survey jointly conducted with the Ministry of Environment, in which representatives from ASM cooperatives both within and outside of their area of influence were interviewed and data collected.</p> <p>Some 94 sites were identified within the area of influence that exploit a range of materials (largely precious metals, but also salt used in de-icing), and in various states of activity. An additional 18 sites were identified outside the DET area of influence, but within the O’Higgins Region.</p> <p>As a result, DET has developed work plans to support capacity building in local ASM communities, including agreements at 3 cooperatives to implement a workplan to include technical visits to DET to transfer technology on slope stabilization, direct works conducted at cooperative’s site to improve roads, and direct provision of materials.</p>
26. Human Rights	Fully meets	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>DET has begun to implement the UN Guiding Principles on Business and Human Rights and has assessed the risks and impacts through the due diligence procedures. DET is subject to the corporate commitment to human rights communicated generally through the sustainability report.</p> <p>DET conducted a human rights impact assessment in October 2021. There is work to establish a system to monitor risks as well as identify and address any violations.</p>

		<p>Three gaps were identified:</p> <ul style="list-style-type: none"> • The system to monitor the risks, identify and close gaps related to human rights impacts is not fully established. • There are no specific reports on human rights. • There is no training on human rights <p>This was confirmed through interviews with management, interviews with workers, interviews with community representatives, and a review of documents including a due diligence report, corporate sustainability commitments, and the register of grievances.</p> <p>The follow up assessment confirmed the creation of a focused risk assessment matrix to evaluate human rights risks. These are scored as “low,” “medium,” or “high.” DET has developed a plan for monitoring risks identified including responsible parties and outputs. Some risks have been elevated to the “strategic” level for monitoring.</p> <p>Training on human rights has been provided to workers as of November 2023.</p>
27. Security and Human Rights	Fully meets	<p>At the corporate level, CODELCO has policies, procedures and practices that address the Voluntary Principles on Security and Human Rights. During the human rights impact assessment, security and human rights was considered.</p> <p>Security forces are aware of the policies and principles including elements of human rights.</p> <p>It is recommended to deepen the issues of human rights during the training.</p> <p>This was confirmed through interviews with management, interviews with security forces, and a review of documents including corporate commitments to the Voluntary Principles, corporate procedures, and the final due diligence / human rights impact assessment report.</p>
28. Indigenous Peoples’ Rights	Not applicable	<p>The assessors confirm there are no indigenous peoples in the area of influence, based off a review of the “Official report indigenous peoples, consultation and territory,” the Consolidated Report on the Environmental Impact Study, information from the Ministry of Planning and Cooperation, among other relevant evidence.</p>

<p>29. Land Acquisition and Resettlement</p>	<p>Fully meets</p>	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>At the corporate level, CODELCO has procedures to analyze the potential impacts that the acquisition of non-operating real estate assets or the investment projects could cause to community and/or economic activities.</p> <p>Three gaps were identified:</p> <ul style="list-style-type: none"> • DET does not have a specific resettlement policy, strategy, or procedure, nor defined mechanisms to avoid and/or minimize the resettlement and physical or economic displacement of their projects. • Physical displacement is not considered in any of the future projects of DET. • No studies have been conducted regarding economic displacement. <p>This was confirmed through interviews with management, interviews with community representatives, and a review of documents including the environmental impact assessment and the corporate sustainability commitments.</p> <p>The follow up assessment confirmed that at the corporate level, there is an internal process now that details the analysis required for capital investments, including consideration of community impacts to be established in the environmental impact studies.</p> <p>One element included is the project requirement for “third party” territory for project execution, as well as socio-economic conditions. Although the standard does not directly reference physical displacement impacts, it references the national Environmental Impact Assessment Services and the enabling legislation, which includes the types of impacts that generically fall under the rubric of displacement, including restricted access to resources, alteration of community goods, infrastructure, services, natural spaces, direct displacement and other related criteria; and requires application of appropriate mitigating actions.</p> <p>DET has completed an analysis of 7 capital projects scheduled for implementation between 2023 and 2028, resulting in a conclusion that no physical or economic displacement impacts are anticipated. All</p>
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		seven projects are planned for execution on lands already belonging to Codelco.
30. Cultural Heritage	Fully meets	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>DET is developing relevant activities to strengthen the conservation of cultural heritage in conjunction with relevant stakeholders in at least two heritage sites.</p> <p>Two gaps were identified:</p> <ul style="list-style-type: none"> • DET does not have policies, strategies and/or procedures to manage, avoid and/or minimize the risks associated with cultural heritage. • There is no mapping of tangible and intangible cultural heritage in the area of influence, nor a survey of risks and impacts that considers the relevant stakeholders. <p>This was confirmed by interviews with management, interviews with representatives from the community, and a review of documents including the strategic action plan for the Sewell Foundation and the environmental impact assessment.</p> <p>The follow up assessment confirmed that DET has developed two procedures, one of which defines a strategy for managing cultural resources on DET property, and a process to follow in case external entities identify cultural and archaeological resources at the site.</p> <p>The second DET procedure governs handling of 'archaeological, paleontological and historic 'chance finds' on the property. The procedure identifies types of finds, as well as the process for cessation of works and notifying authorities.</p> <p>DET has also conducted mapping of cultural heritage, documenting existing and identified cultural sites that are subject to management interventions.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>As of the follow up assessment in January 2024, this criterion is determined to be fully meets.</p> <p>At the corporate level, CODELCO has begun to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals in Conflict-Affected or High-Risk Areas (OECD Guidance) in 2022.</p> <p>Four gaps were identified:</p>

		<ul style="list-style-type: none"> The due diligence management system is not finalized and implemented. The due diligence management system is not disseminated to DET / other sites within CODELCO. The red flag identification process is not fully developed and implemented. Implementation may result to additional requirements for risk assessment and management. There is no public reporting on the due diligence system. <p>The follow up assessment confirms that the system is fully implemented and rolled out to DET.</p>
31.a. Management System	Fully meets	<p>At the corporate level, CODELCO has a commitment policy from senior leadership that details due diligence in the supply chain. CODELCO has begun to update documents to reference the due diligence process and updated the grievance mechanism to include the extraction, transport, commercialization, handling and processing of minerals.</p> <p>Sufficient resources are allocated to the due diligence system.</p> <p>The follow up assessment confirms the due diligence management system is finalized and implemented, and disseminated to DET.</p>
31.b. Red Flag Identification Process	Fully meets	<p>At the corporate level, CODELCO has a process to evaluate suppliers through due diligence including Know Your Customers procedures for compliance and anti-corruption. In addition, there is a CAHRA determination process and documentation to identify conflict-affected and high-risk areas. The red flag identification process and methodology is now fully developed and implemented.</p>
31.c. Risk Assessment Process	Not applicable	No red flags were identified.
31.d. Risk Management Process	Not applicable	No red flags were identified.
31.e. Public Reporting	Fully meets	The Step 5 report, including information on DET is now available here .
32. Transparency and Disclosure	Fully meets	At the corporate level, CODELCO prepares annual reports on environmental, social and governance performance based on to international standards

		<p>such as the Global Reporting Initiative (GRI) with the aim of delivering indicators comparable at the national and international level, as well as in the extractives industry. It includes details at site level.</p> <p>Additionally, CODELCO must submit annual reports to the Financial Market Commission regarding its Corporate Governance and Sustainability practices.</p> <p>Stakeholders are aware of the sustainability reporting.</p> <p>This is confirmed through a review of the annual reports, interviews with management, and interviews with stakeholders.</p> <p>More information is available here and en español.</p>
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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 1 February 2024.	<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 Copper Mark Criteria by 1 February 2024.	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment and / or for Criterion 31, the applicable criteria of the Joint Due Diligence Standard. The Site has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	

Additional comments:	
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Award

This Summary Report is prepared using data from the independent review report and the independent assessment report. The Copper Mark confirms the assessors' conclusion and awards The Copper Mark and The Molybdenum Mark as follows.

Date the Copper Mark and The Molybdenum Mark are awarded	23 February 2023
Expiry Date of The Copper Mark and The Molybdenum Mark	22 February 2026