



Assessment Summary Report

Participant Information

Name of the Site	Oyu Tologu LLC
Unique identifier provided by the Copper Mark	P0002
Address	Mine Site: 2VG8+4HQ, Khanbogd, South Gobi, Mongolia, Oyu Tolgoi, Mongolia Head Office in Ulaanbaatar: Monnis Tower, Chinggis Avenue 15 Sukhbaatar District - 14240, Ulaanbaatar, Mongolia
Country of Operation	Mongolia
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper, gold, and silver concentrate
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper, gold, and silver
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, gold, and silver
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 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 type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input type="checkbox"/>
Other (<i>please explain</i>)	

Equivalent Systems

The following equivalent systems were applied:

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

Equivalent System	Review Process	Criteria Covered by Equivalency
NA	NA	NA

Independent Site Assessment Information

Name of the Lead Assessor	Kevin Wei & Grace Cao
Name of the Assessment Firm (if applicable)	RCS Global Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Onsite: 13-17 August 2023 Desktop review: 7 October 2023
Assessment Period	14 August 2022 – 13 August 2023
Summary of the Assessment Methodology	<p>The assessment applied the Copper Mark’s Criteria for Responsible Production. Additionally, the assessment criteria included the following:</p> <ul style="list-style-type: none"> • Risk Readiness Assessment (RRA) of the Responsible Minerals Initiative (RMI) • RRA-Copper Mark Criteria Guide of February 2020 • Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (Joint Due Diligence Standard) <p>The assessment methodology included data gathering through the site visit to the facility, observation, employee and management interviews, and document review of policies, procedures, and records related to each of the specific Copper Mark criteria. A sampling approach was used related to document selection and employee selection.</p> <p>As part of the risk-based approach, the following criteria were considered:</p>

	<ul style="list-style-type: none"> • Size and complexity of the audit • Adequacy of systems and processes to detect inconsistencies. • Understanding of the audit programme • Controls over compliance with legal requirements • Controls over relevance and reliability of information • Controls over programme operations • General control of information systems • Second- or third-party audits relevant to the objectives of the audit. <p>Permanent workers: 4,309 (Male: 3,737, Female: 572) Contract and temporary workers: 17,193</p>
Summary of the Assessment Activities	<p>Assessment activities included:</p> <ul style="list-style-type: none"> • Opening meeting • Worker interviews • Stakeholder interviews • Management interviews • Walkthrough of the facilities • Policies, procedures, and records review • Closing meeting

Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Oyu Tologi LLC (OT) have in place standards, guidelines, policies, and procedures to ensure legal compliance with national and international laws. Additionally, OT utilizes a Combined Legal Roster and Legal Compliance List to identify and adhere to new legal requirements, ensure information is up to date, and create accountability.</p> <p>OT undergoes internal and external audits and inspections, and document reviews confirm adherence to their requirements.</p> <p>Permit application requirements and status are included in the Legal Basis List and a Permit Master List to verify</p>

		<p>the validity of all relevant permits. As of the assessment date, some permits are still in the renewal process, but all applications have been submitted and are pending completion by local authorities.</p> <p>Interviews with management and workers demonstrate an understanding of policies and procedures, as well as relevant laws to their positions. Training is provided.</p> <p>This was confirmed through site observation; management interviews; worker interviews; and document review including relevant policies, Combined Legal Roster, Legal Compliance List, Permit Master List, job descriptions and qualifications, among others.</p>
<p>2. Business Integrity</p>	<p>Fully meets</p>	<p>OT has in place a documented management system that effectively prevents bribery, corruption, fraud, and anti-competitive behaviour. OT has established The Way We Work – Our Code of Conduct, which states the commitment and process to uphold the highest standards of integrity in all business interactions with a zero tolerance in its business practices.</p> <p>OT has a Business Integrity Procedure is also in place, which encompasses steps for third-party benefits, conflict of interest, sponsorships, donations, facilitation payments, internal fraud, money laundering and more.</p> <p>Systems are in place to track all actual or potential business integrity violations and maintains historical records of all closed investigations. OT also utilises a Risk Register Risks Map to identify, track and manage potential risk sources.</p> <p>Third-party audits confirm OT’s compliance with legal requirements for Generally Accepted Accounting Practices.</p>

		<p>Staff receive training on these topics during onboarding and annually.</p> <p>This was confirmed through site observation; management interviews; worker interviews; and document review including the anti-bribery policy, code of conduct, Business Integrity Procedure, training records, among others.</p>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>OT has effective systems in place to identify stakeholders directly or indirectly impacted by its operations and activities, as well as those with potential influence on the company, such as business and industry associations.</p> <p>The stakeholder mapping assesses the levels of interest and influence stakeholders have, establishes dynamic engagement levels (ranging from informing to empowering), and determines appropriate engagement and communication strategies. It also tailors' engagement tactics accordingly. Additionally, OT designates specific departments and employees to manage these engagements and monitor changes in stakeholders' attitudes.</p> <p>Community Engagement Plans and calendars are used to schedule, plan, and monitor stakeholder engagement.</p> <p>OT has an effective grievance mechanism to allow stakeholders to raise issues via a Hotline Website, phone, and email. This grievance system aligns to UNGP Effectiveness Criteria for Non-Judicial Grievance Mechanisms and includes a management procedure for investigating and responding to complaints received via this channel.</p> <p>Interviews with staff and management confirm that they have received relevant training. Stakeholder interviews confirm that OT's grievance mechanism does not stop them from accessing other mechanisms,</p>

		<p>stakeholder engagement is conducted, and corresponding results/ progresses are communicated regularly.</p> <p>This was confirmed through management interviews; community stakeholder interviews; and document review including the stakeholder map and outcome matrix, grievance procedure, Community Engagement Plan and Calendar and records of grievances, among others.</p> <p>More information is available here.</p>
<p>4. Business Relationships</p>	<p>Fully meets</p>	<p>OT has in place policies and practices regarding management of ethics and standards in business relationships. They have established a Sourcing Procedure and Know Your Third- Party Procedure, which includes contractual process with business partnership (supplier and contractors) on the implementation of the OT's own policies, and risk assessment of significant business partners and their associated business risks.</p> <p>A pre-qualified process is conducted for new business partners and business partners are assessed every 2 years with assessment reports. These reports cover financial information, business integrity and human resources, environmental management, health and safety management, and supplier tier type.</p> <p>The Supplier Code of Conduct is communicated to all business partners, and OT conducts regular monitoring and communication of the business partners' performance. This includes a Risk Mitigation Plan, whose implementation is monitored.</p> <p>Contractor interviews confirm they have received training on OT's requirements regarding responsible practices and the operational controls are in place to ensure adequate working conditions.</p> <p>This was verified through management interviews; and document review,</p>

		including the code of conduct, supplier code of conduct, supply policy, due diligence procedure, requirements for contractors, signed supplier agreements, samples of due diligence files, and supplier evaluations, among others.
5. Child Labour	Fully meets	<p>OT has in place a management system that ensures against the employment of people under the age of 18 years old. This is embodied in the Human Rights Policy, Employment Policy, and the Code of Conduct.</p> <p>Hiring procedures are in place to verify age of applicants; such requirements are communicated and trained to direct employees and contractors, which are also verified for conformance.</p> <p>No underage persons were observed onsite.</p> <p>This was verified through worker interviews; management interviews; site observation; and document review, including the Code of Conduct, Human Rights Policy, hiring checklist, communication, and training records, among others.</p>
6. Forced Labour	Fully meets	<p>OT has in place policies, procedures, and practices to prevent the use of forced labour or participation in acts of human trafficking. This is embodied in the Human Rights Policy, Employment Policy and the Code of Conduct.</p> <p>OT do not withhold any original identity document, and based on sampled pay rolls there is no evidence of illegal fees, penalties or personal loans that can be considered risk of modern slavery.</p> <p>Interviewed workers confirm that they are free to end the labour relationship after giving a notice, have received training on the policies, can move freely, and are not aware of any forced labour on-site.</p> <p>This was verified through worker interviews; management interviews; site</p>

		<p>observation; and document review, including the code of conduct, severance payment records, and the Human Rights policy, among others.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>OT has in place policies, procedures, and practices to ensure they respect employees' rights to freedom of association and to collective bargaining.</p> <p>There is a collective bargaining agreement in place covering general provisions and definitions, remuneration, employees' training and career development, roster schedule and leave, labour safety and hygiene, employee welfare and workplace guarantee, trade union activities, and collective agreement implementation, monitoring and amendment.</p> <p>Management interviews state that OT respects the workers' right to associate, to bargain collectively and to peacefully assemble, and grants equal treatment between different union members.</p> <p>Worker interviews and a representative of trade union committee confirm that OT does not restrict access to or interfere with employees' efforts to organise or bargain collectively.</p> <p>This was confirmed by interviews with management; worker interviews; union representatives' interviews; and a review of documents including the collective bargaining agreements, the company's code of conduct, and training records, among others.</p>
<p>8. Discrimination</p>	<p>Partially meets</p>	<p>OT has in place policies, procedures, and practices to identify and prevent discrimination and harassment against a wide range of protected classes including age, gender, race, national and ethnic origin, religion, language, and sexual orientation, among others. This is embodied in the Supplier Code of Conduct, Anti-discrimination, Sexual Harassment and Bullying Policy, Inclusion and Diversity Policy and Code of Behaviour.</p>

		<p>The Recruitment and Selection Procedure states a commitment to a fair, consistent and transparent approach to recruitment and selection, and employs based on merit as compared to job requirements.</p> <p>Worker interviews confirm they are aware of the discrimination policy, have received relevant training, and that OT does not practice discrimination against any individuals or groups.</p> <p>Additionally, OT has launched an Everyday Respect Program and published an accompanying report. Based on the findings within this report, and Everyday Respect Plan has been established, with the aim to achieve the following: provide Everyday Respect training, increase diversity and the support for diverse people in the organisation, particularly those in vulnerable positions; provide an easy and safe way to speak up about and report harmful behaviours, and support people through the process and conduct contractor on-boarding to Everyday Respect Program.</p> <p>An independent review of the Every Day Respect Program implementation is planned across the full company in 2024.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • The remediation actions stated in the Everyday Respect Plan are currently in-progress, hence, are not fully complete. <p>This was confirmed by interviews with management; workers interviewed; external stakeholder interviews and a review of documents including the Human Resources policy, Supplier Code of Conduct, Anti-discrimination, Sexual Harassment and Bullying Policy, Inclusion and Diversity Policy, Code of Behaviour and a salary review, among others.</p>
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<p>9. Gender Equality</p>	<p>Partially meets</p>	<p>OT has in place policies, procedures, and practices to identify and prevent discrimination and harassment based on gender, childcare needs, pregnancy, and maternity leave. This is embodied in the Supplier Code of Conduct, Anti-discrimination, Sexual Harassment and Bullying Policy, Inclusion and Diversity Policy and Code of Behaviour.</p> <p>OT's The Way We Work-Our Code of Conduct is committed to proactively building diverse teams with ambitious targets to improve the representation of under-represented people, including women. The representation of women within the workforce are increased year by year from 2018; with 21.6% in 2021 and 22.9% in 2022. The site aspires to increase the proportion of women in their workforce by 2 percentage points year-on-year will continue in 2023.</p> <p>The Why Gender Matters program includes a Guidance on "how to" integrate gender considerations into Communities work.</p> <p>Male and female workers performing work of equal value are paid at the same rates.</p> <p>Both management and workers demonstrate knowledge of the company's policy on gender equality, and receive training related to gender discrimination.</p> <p>Rio Tinto, the parent company, launched an Everyday Respect Program and published an accompanying report. Based on the findings within this report, and Everyday Respect Plan has been established, with the aim to achieve the following: provide Everyday Respect training, increase diversity and the support for diverse people in the organisation, particularly those in vulnerable positions; provide an easy and safe way to speak up about and report harmful behaviours, and support people through the process and conduct</p>
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		<p>contractor on-boarding to Everyday Respect Program.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • The remediation actions stated in the Everyday Respect Plan are currently in-progress, hence, are not fully complete. <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the code of conduct, Human Resources Policy, Supplier Code of Conduct, Anti-discrimination, Sexual Harassment and Bullying Policy, Inclusion and Diversity Policy, Code of Behaviour, salary review, and sustainability report, among others.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>OT has in place policies, procedures, and practices to keep employees' regular and overtime working hours within legally required limits.</p> <p>A standard workday is 8 hours and does not exceed 12 hours within any 24-hour period, as part of the voluntary overtime policy. OT adopts a 14-day on/off rotation for long roster employees and a 7-day on/off rotation for short roster employees, averaging 42 hours per week over the full roster period, within the 60-hour maximum.</p> <p>Procedures for leave and flexible work arrangements are established to comply with local laws for weekly rest, annual leave, public holidays, sick, and family leave, enhancing employees' work-life balance.</p> <p>Worker interviews confirm that they have received training on the working hours policy, and that overtime is voluntary.</p> <p>This was confirmed by interviews with management; interviews with workers; a review of documents including the code of conduct, contracts, union agreements, internal regulations,</p>

		internal audits, and attendance records, among others.
11. Remuneration	Fully meets	<p>OT has in place policies, procedures, and practices to pay employees wages that align with the average local industry wage, which is higher than the minimum wage.</p> <p>The Collective Agreement states that an employee should be paid a base salary plus applicable allowance, and payment should be made bi-monthly in accordance with the local law.</p> <p>Interviewed workers report that they have received training on the HR policies and procedures, including the remuneration, are paid correctly and on time, and pay slips are available.</p> <p>This was confirmed by interviews with management; interviews with workers and management; and a review of documents including wage records, code of conduct, union agreements, and government inspection reports, among others.</p>
12. Occupational Health and Safety	Fully meets	<p>OT has successfully developed an internal health and safety management system that is aligned with ISO 45001.</p> <p>This is complimented by a Health & Safety, Environment and Communities (HSEC) policy, and a HSEC Committee who is responsible for the implementation of HSEC management. As well as procedures such as the Health, Safety and Environment (HSE) Non-Conformance, Incident and Action Management Procedure and the HSE Emergency Response Procedures.</p> <p>OT conduct regular Environmental, Health and Safety (EHS) inspections and audits. The 2023 HSE Work Area Inspection achieved a score of 85% and covered aspects such as appropriate use of PPE, fire protection and emergency procedures, electrical safety, manual handling and more. Where EHS issues are raised, there are</p>

		<p>action plans in place with responsible managers for closing the issues.</p> <p>Furthermore, Safety Data Sheets (SDS) are available to staff in the Chem Alert System and chemicals are classified and segregated and stored with the SDS posters.</p> <p>OT annually publish their health and safety performance in the Sustainability-Fact-Book.</p> <p>Worker interviews confirm that they have received HSE training, are provided with sufficient PPE and have general safety awareness.</p> <p>This was confirmed by interviews with management; interviews with workers and management; and a review of documents including the Sustainability-Fact-Book, training documents, and relevant policies and procedures, among others.</p>
<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>OT has developed and implemented a grievance mechanism that can be accessed via web, phone, email or face-to-face, is available for internal and external stakeholders, and may be anonymous. All grievances are required to be investigated, the identity of all affected persons or whistle-blowers to be protected, to be ensured that there is no reprisal or intimidation approach towards whistle-blowers, and for there to be a response within an established deadline and the outcome communicated to the complainant.</p> <p>The grievance mechanism was developed in alignment with the UN Guiding Principles Effectiveness Criteria for Non-Judicial Grievance Mechanism.</p> <p>Annual grievance statistics record, annual grievance analysis record and sampled grievance handling records are in place to demonstrate that the grievance is handled according to defined processes.</p>

		<p>Worker interviews confirm that the grievance mechanism is effective and there is no reprisal or intimidation to their best understanding.</p> <p>This was confirmed by interviews with management; interviews with workers and a review of documents including the code of conduct, annual statistics of complaint channel, and records of grievances, among others.</p>
<p>14. Environmental Risk Management</p>	<p>Fully meets</p>	<p>OT has an established environmental policy that commits to implementing an Environmental Management System (EMS) and various procedures to ensure appropriate EMS is fully implemented. Processes are in place to regularly monitor compliance status of applicable environmental legal requirements, and a register is established to identify updates to these requirements.</p> <p>OT utilises the Hazard and Risk Management Procedure and Qualitative Risk analysis, to identify, assess, mitigate and control risks to the natural environment and environmental impacts to workers and communities.</p> <p>Furthermore, OT regularly monitor their performance on different environmental topics, set appropriate KPIs and create corresponding action plans. Corrective actions triggered during the monitoring process (inspection, testing, monitoring, and audit, etc.) are communicated and followed up on defined frequencies for implementation and closed out.</p> <p>Finally, OT have tested emergency response plans, which collaborate with emergency agencies and other stakeholders who may be affected and have prepared a Spill Response Procedure.</p> <p>Worker interviews confirm that they have received EMS training.</p> <p>This was confirmed by interviews with management; interviews with workers; interviews with stakeholders; and a</p>

		<p>review of documents including the Emergency Response Plan, Environmental Management system, and monitoring data among others.</p>
<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>OT adopts the corporate level commitment on Climate Change and climate change strategy, which is aligned with the goal of limiting global warming to 1.5°C. OT have a long-term road map targeting 50% carbon emissions reduction by 2030 and net zero by 2050 for Scope 1 and 2 emissions, with a 2018 baseline. Additionally, a mid-term target of a 32.5% reduction by 2025.</p> <p>GHG emissions are tracked, monitored, and publicly reported in their annual Sustainability Fact Book. Despite a rise in 2022 emissions compared to the baseline, there are several points that explain the rise in GHG emissions and provide confidence that the site remains on track for its medium and long term decarbonisation plans. Based on management interview and worker interview, awareness communication is in place to ensure workers understand and support the climate change policy.</p> <p>This was confirmed by interviews with management; and a review of documents including the risk assessment, Sustainability Fact Book, monitoring data, and reduction plans, among others.</p> <p>More information is available here.</p>
<p>16. Energy Consumption</p>	<p>Partially meets</p>	<p>OT commits to reduce energy through The Way We Work – Our Code of Conduct and has incorporated energy management in its climate change pathway. However, they have not established their target for either absolute energy consumption or energy intensity. OT faces challenges in setting targets during its transition from open pit to underground mining without an energy baseline. OT plans to establish energy consumption targets</p>

		<p>once it reaches full operational capacity.</p> <p>Energy consumption has been tracked monthly with regular measurements and reporting of principal energy flows at unit process level. Despite no reduction in energy use during the assessment period, energy savings managers have been tasked to develop programs targeting energy use intensity and reductions across processing facilities.</p> <p>OT do not currently have calculations on energy intensity, and there's no evidence of reductions. Reduction strategies and reports will be generated in the next four years after evaluating facility performance with the new underground ore.</p> <p>Furthermore, OT implements annual energy management and action plans, enhancing efficiency and reducing consumption through measures like installing solar panels and efficient lighting, as observed during site tours, and documented in annual reports.</p> <p>Worker interviews confirm they are aware of the policy on energy consumption reduction, and they have observed measures in energy management.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • OT has not quantified energy use. • There are no reduction targets. • No evidence is in place to demonstrate that they are in preparation of mass and energy balance. <p>This was confirmed by interviews with management; and a review of documents including the risk assessment, Sustainability Fact Book, monitoring data, and reduction plans, among others.</p>
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<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>OT has conducted a water-use impact assessment in collaboration with relevant stakeholders and implemented a water management system and other measures that minimize consumption on other water users and on fauna and flora in the catchment area of the site. This is complimented by the Water Resources Management Plan, where they commit to implementing freshwater management measures at the site. OT also undertakes an independent audit of its water use status every 5 years.</p> <p>The OT Project is permitted to withdraw groundwater from 28 production wells installed in the regional aquifer, which contains brackish Permitting for this water abstraction is contained in a Long-Term Water Contract with the Government of Mongolia, issued in 2016 and valid until 2040.</p> <p>OT has set a target of raw water usage at 22% below the permitted rate and aims for a raw water use efficiency 55% below the global average. To date, they have achieved over 80% in water recycling efficiency and have set an ambitious goal of reaching 90%. Tracking records show that their performance consistently exceeds their commitments. A water balance diagram and relevant data are provided to demonstrate the auditee's water efficiency achievements.</p> <p>OT avoids direct wastewater discharge into the environment, recycling most of it for use in tailings facilities or production after treatment, except for evaporation and specific uses like tree nurseries. A qualified third party manages the treatment plants, with logs and tests ensuring water quality compliance. Stakeholders raised serious concerns and dissatisfaction about contamination, related to the tailings storage facility.</p> <p>Water scarcity is significant within the region that OT operates, and</p>
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		<p>stakeholder interviews highlight concerns about water scarcity linked to the OT's water use. Evidence suggests OT collaborates with stakeholders to revise a study on redirecting northern surface water southward.</p> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, relevant policies, permits, environmental impact matrix, and the water management system, among others.</p>
18. Waste Management	Partially meets	<p>OT has established a waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (hazardous, non-hazardous, inert). However, it is not fully implemented: 5 types of hazardous wastes have been stored onsite since 2008 and this exceeds the legally allowed storage period limitation (180 days). Management states that it is because there is no qualified third party for collection and disposal within the same country. OT has confirmed a plan to obtain formal permission for the excessive storage period exemption.</p> <p>Through The Way We Work – Our Code of Conduct OT has a commitment to support the development of the circular economy by following waste hierarchy, that is reduction, reuse, recycle, landfill and other final disposals (or safely storage of the hazardous waste when proper disposal is not feasible). ESIA and Environmental Risk Register confirms that OT has completed risk assessment on waste.</p> <p>Site observations confirm that waste is properly classified across the site, with designated areas for different waste types and a well-managed landfill. Daily monitoring and inspections of storage and landfill areas are conducted, with</p>

		<p>adequate emergency kits and safety controls in place.</p> <p>OT adopts an online waste dashboard for non-mineral waste management to ensure waste inventory and tracking details (like waste stream, type, generation area, received area, quantity, transportation information, disposal methods) are documented and recorded. And OT has assigned qualified service contractors to collect and dispose some hazardous wastes timely.</p> <p>Worker have received training on waste classification, and they are aware of the waste hierarchy.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • 5 types of hazardous wastes have been stored onsite since 2008 exceeding the legally allowed storage period limitation (180 days). <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, relevant policies, permits, environmental impact matrix, and the waste management system, among others.</p>
<p>19. Tailings Management</p>	<p>Partially meets</p>	<p>OT has policies, practises, and procedures in place to operate and monitor its tailings impoundments while minimizing adverse impacts to human health and the environment in line with internationally recognized standards.</p> <p>During a gap assessment with the Global Industry Standard on Tailings Management, 14 gaps were identified. OT engaged external experts to assess the gaps and actions plans were established accordingly. The action plans are underway, with 5 corrective actions completed and implementation for the remaining 9 gaps ongoing.</p> <p>A Completion Report for non-acid forming Confirmatory Sampling at TSF</p>

		<p>(Tailings Storage Facility) for Q1 2023 revealed that OT failed on 17 samples taken for various testing. OT took prompt action to address the issue.</p> <p>Additionally, there is repetition of high TDS (total dissolved solids) values in monitoring results which relate to TSF seepage and requires a long-term action which is ongoing to be completed in June 2024.</p> <p>Interviews with stakeholders reveal serious concerns on the above TSF incidents and the effectiveness of the OT's remediation. As a result, OT assigned a qualified party to conduct an investigation with community representatives to confirm whether or not there is contamination. OT additionally retained a consultant to help develop short-term and long-term mitigation plans, which have been accepted by community stakeholder representatives and are on track to be completed.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> OT has begun to align with GISTM for the design, monitoring, or closure of tailings impoundments, but implementation is incomplete. OT has planned to fully align with GISTM by August 2025. <p>No request for extension has been received to date.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including the code of conduct, and relevant policies, among others</p>
20. Pollution	Fully meets	<p>OT has established policies and procedures for pollution management processes and is committed to the mitigation hierarchy.</p> <p>Risk assessments, testing, monitoring, and reporting are conducted regularly. For any exceedances or pollution-</p>

		<p>related grievances reported, OT has implemented measures to investigate the root causes, mitigate risks, and minimize impacts accordingly.</p> <p>Annual air emissions data is reported publicly in the Sustainability Fact Book.</p> <p>Worker interview confirms that they are aware of some pollution control measures to their best understanding, and they have been trained on methods of managing pollution.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including the code of conduct, monitoring reports, and relevant policies, among others.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Partially meets</p>	<p>OT has developed policies, procedures, and management systems and utilise the mitigation hierarchy for the management of impact on biodiversity; to avoid adverse impacts on Critical Habitats or Endangered Species; and, to disallow operational activities in designated protected areas.</p> <p>However, use of the mitigation hierarchy for the management of impact on biodiversity is inadequate. It is observed that birds are mistaking plastic as food in waste landfill section, but OT does not consider the risk and take corresponding mitigation measures. Additionally, an audit in 2022 reveals a non-conformance on direct land loss that requires a new plan offsetting the loss of rangeland habitat caused by the mine footprint to be presented by May 2023.</p> <p>The Biodiversity Management Plan include baseline data for wildlife habitats, rare plant species, and native vegetation communities. OT identifies important biodiversity features, priority ecosystems services and related natural resource availability through such baseline assessment.</p>

		<p>Site observations confirm that OT has implemented various biodiversity protection measures, such as strictly prohibiting trapping, hunting, or disturbing wild animals, limiting access to pristine habitats to reduce potential degradation and wildlife interaction, and installing fences to direct movement to established roads and paths while allowing wildlife to roam freely according to their natural habits. Additionally, OT has established a replacement spring to ensure sufficient water resources, created a native plant nursery, prioritized select plants for rehabilitation, relocated rare plants, and conducted biodiversity monitoring, among others.</p> <p>The 2022 Annual Report – Core Biodiversity Monitoring Program demonstrates that OT has regularly monitored the biodiversity trend. Additionally, the Cultural Heritage Management Plan confirm that the auditee does not operate in protected area. There are 6 protected areas around and the nearest one is 18 kilometres away.</p> <p>Training plan and training records are in place to demonstrate that OT has provided biodiversity training to employees, contractors, and relevant stakeholders.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Use of the mitigation hierarchy for the management of impact on biodiversity is inadequate because (1) It is observed that birds are mistaking plastic as food in waste landfill section but this is not considered by OT; and (2) In IESC audit from September 2022, there is a non-conformance on direct land loss result at 6410.5 ha at the end of 2020 that requires a new plan offsetting the loss of rangeland habitat caused by the mine footprint to be presented by May 2023.
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		<p>However, such offset plan was not available at the time of the assessment and the 2022 direct land loss has reached 6,809.44 ha.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including the code of conduct, relevant policies, the environmental impact assessment, and the flora and fauna monitoring reports, among others.</p>
22. Mine Closure and Reclamation	Fully meets	<p>OT has developed a mine closure plan to mitigate the financial, social and environmental risks associated with permanent cessation mining, processing and/or logistics operations. The control requirements such as closure plan, closure cost estimates and accounting provisions are included. OT has an Approach to Closure to define priorities for effective closure and measures to achieve it.</p> <p>The Closure Plan includes several proposed community and socio-economic initiatives to be implemented as the project transitions from operations to closure and post-closure. All these initiatives will adhere to the regulatory requirements of the Government of Mongolia, as well as industry best practices performance standards and requirements, and the Rio Tinto Closure Standard.</p> <p>Interviews with management confirm their understanding of closure strategies and mine closure plan, including closure targets and goals, and confirm the closure cost estimates and the reclamation progress.</p> <p>This was confirmed by interviews with management; site walkthrough; and a review of documents including code of conduct, relevant policies, and closure plan, among others.</p>
23. Community Health and Safety	Fully meets	<p>OT has implemented policies and procedures to evaluate and mitigate</p>

		<p>significant potential health impacts to communities. This is complimented by the Community Health, Safety & Security Management Plan.</p> <p>OT has executed and maintained a Stakeholder Mapping, which is regularly updated. They have also formulated an engagement strategy and a fully operational grievance mechanism, compliant with the UN Guiding Principles' Effectiveness Criteria for Non-Judicial Grievance Mechanisms. Furthermore, OT has established Environmental and Social Impact Assessments (ESIA) and an HSE Risk Register, showcasing their comprehensive scoping process to identify and evaluate all significant social and environmental impacts of their operations, along with a corrective action register for implementation and resolution.</p> <p>OT conducts regular environmental monitoring and reporting. When testing or monitoring indicates an exceedance (failure) or when pollution-related grievances arise, OT promptly investigates the root cause, takes steps to mitigate the risk, and minimizes the impact. For instance, to address a community complaint received in Q3 2022 about road dust, OT has implemented daily water spraying along the road during the warm season.</p> <p>Interviews with community members demonstrate a basic understanding of the auditee's policy on community health and safety.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including Sustainability Report, the Environmental, Social and Health Risk Assessment, Stakeholder Mapping, among others.</p>
24. Community Development	Fully meets	OT has plans, policies and procedures in place to effectively identify and understand community needs, and to

		<p>support community development in basic social services, environmental management, national history & heritage, social infrastructure, traditional livelihoods & pasture management, water management.</p> <p>There is a Tri-Partite Council (TPC) in place with a Management Unit (MU) consisting of three types of members including OT Community department MCAP, Deputy Governor of local community and leader of Herder representative team. Herder representative team leader is appointed as chairperson. TPC regularly collects feedback from local community and follows up per defined process. Additionally, relevant activities are publicly communicated on social media.</p> <p>Additionally, OT makes an annual contribution to Gobi Oyu Development Support Fund (DSF) –which is a standalone legal entity jointly established by OT and the Community. DSF is responsible for implementing the Cooperation Agreement between OT and its affected communities. It has established effective processes for annually assessing community needs, generating recommendations, evaluating proposals, prioritizing financial resource allocation, and monitoring relevant project progress through collaborative efforts with various stakeholders.</p> <p>Interviews with direct and indirect employees, who are also local community members, confirm that OT is a major employer in the region with a job application process aimed at hiring local workers. Additionally, stakeholder interviews indicate that relevant parties are informed about DSF and the accomplishments and plans for community development.</p> <p>This was confirmed by interviews with management; community interviews; and a review of documents including</p>
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		stakeholder mapping of local communities, minutes of community meetings, social Management plan, among others.
25. Artisanal and Small-Scale Mining	N/A	The assessor confirmed that there are no Artisanal and Small-Scale Mining operations in the area of influence of OT.
26. Human Rights	Fully meets	<p>OT has adopted the UN Guiding Principles on Business and Human Rights, establishing policies and procedures to implement the UNGPs.</p> <p>Human rights due diligence is conducted to pinpoint and evaluate supply chain risks, guided by procedures that outline risk identification and assessment criteria per OECD Guidance.</p> <p>Both internal and external stakeholders report awareness on the human rights policy, how to report violations and how these are remediated. Additionally, training records confirm the trainings on human rights policy are provided to employees. Lastly, interviewed employees and stakeholders do not report instances of human rights abuses by OT.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including the code of conduct, human rights risk assessment, human rights risk matrix, case studies, and the sustainability report, among others.</p>
27. Security and Human Rights	Fully meets	OT has implemented a Human Rights Policy that covers security practices and commits to identify risks related to human rights security practices, acting in alignment with the UN Declaration on Human Rights, UN Global Compact, and Human Rights Working Group in Rio Tinto. The system is aligned with the UN Voluntary Principles for Security and Human Rights.

		<p>OT conducts regular review to the security services company through Contractor Work Performance Review.</p> <p>Rio Tinto Security Standard defines the minimum requirements in respect of managing security risks. For instance, all aspects of security management must be in line with the Voluntary Principles on Security and Human Rights (VPSHR) and the use of force principles.</p> <p>Security training on human rights is provided during the onboarding process and on annual basis.</p> <p>Security Risk Analysis and Management defines the security risk analysis and management process steps, including security risk workshop, implement the security plan and related controls and monitor the implementation.</p> <p>During the site tour, no instances of human rights abuses by the security guards are observed and management state that human rights violations are low risk.</p> <p>Interviewed security staff are aware of the Voluntary Principles on Security and Human Rights, and the management state the security policies, procedures and implementation of security and human rights.</p> <p>This was confirmed by interviews with management; worker interviews; security personnel interviews; and a review of documents including code of conduct, human rights risk assessment, and the grievance procedure, among other.</p>
<p>28. Indigenous Peoples' Rights</p>	<p>Not applicable</p>	<p>The assessor confirmed that there are no recognised minority and indigenous communities in South Gobi.</p> <p>OT operates in South Gobi, Mongolia. There is a strong notion that Mongolia is socially and culturally homogenous and Indigenous Peoples largely remain</p>

		<p>unrecognized in terms of actual government supported policies, which are broadly focused on Mongolian citizens.</p> <p>According to internet research, stakeholder interview, management interview and tour observation, there is no recognised minority and indigenous communities in South Gobi.</p> <p>European Bank for Reconstruction and Development has a that Indigenous Peoples does not apply to impacted herders except to the extent that it helps to inform the standard of protection that this community should enjoy due to the vulnerability of the traditional herder lifestyle to economic development and social change.</p> <p>Baseline Assessment of ESIA confirms that there is no indigenous people within South Gobi. Herder communities are part of the mainstream of Mongolian society from an ethnic and cultural perspective. Herder communities are treated as a “vulnerable group” within the ESIA given the pressures placed on their traditional lifestyle by economic development and social changes.</p>
<p>29. Land Acquisition and Resettlement</p>	<p>Fully meets</p>	<p>OT’s The Way We Work – Our Code of Conduct includes a policy to avoid acquisition and resettlement. It further defines a process to minimise resettlement and project-related land acquisition and associated restrictions on land use and relevant adverse impacts when unavoidable.</p> <p>OT evidence that they had explored alternative project designs to avoid or minimize land acquisition and physical or economic displacement before acquisition.</p> <p>OT have established a Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP). The RAP Outcome Evaluation Report demonstrates that OT has undergone</p>

		<p>evaluations of land access, resettlement, consultation, social impact, and livelihoods.</p> <p>OT runs a continuous monitoring program to evaluate the effectiveness of its RAP and LRP, tracking variables such as the number of affected families, employment conditions of affected households, livestock numbers and structure, household income, water supply, sanitation, health care, and more.</p> <p>OT have taken effective action plans to address residual impacts. Stakeholder interview confirms that the affected herders are aware of the OT's policy on resettlement, and they are involved in the engagement on issues relating to resettlement and remedy negotiation.</p> <p>This was confirmed through site tours, management interviews; community member interviews; and a review of documents including the human rights assessment, sustainability index, annual due diligence report, and of human rights policies and procedures.</p>
<p>30. Cultural Heritage</p>	<p>Fully meets</p>	<p>OT has a system to identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage.</p> <p>OT collaborates with specialized Mongolian institutions, including archaeologists, for cultural assessments and risk evaluations, storing reports in their databases. A digital map of cultural heritage has been created for further proactive protection measures.</p> <p>Workers and management have received relevant training on the matter. Stakeholder interviews confirms that the OT positively engages with relevant stakeholders on issues relating to cultural heritage.</p>

		<p>This was confirmed through site tours management interviews; community member interviews; and a review of documents including the human rights assessment, sustainability index, annual due diligence report, and of human rights policies and procedures.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>OT has developed a policy and due diligence process to ensure a robust and clear supply chain. OT does not accept any external materials.</p> <p>This was confirmed by interviews with management; and a review of documents including the code of conduct, requirements for contracted companies, supplier assessments, and due diligence procedure among others.</p>
31.a. Management System	Fully meets	<p>OT maintains a clear and robust material control system for traceability, including a monthly reconciliation process. The recorded data includes production dates, material types, weights, and compositions.</p> <p>The Mineral Sourcing Policy commits to responsible mineral sourcing in the supply chain, requiring OT to identify, assess, and address any adverse impacts of mining operations, aligning with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.</p> <p>Due diligence for the supply chain is primarily managed at the corporate level by Rio Tinto.</p> <p>There is a regular review process to evaluate the due diligence management and ESG systems, covering responsible sourcing, human rights, health, safety, and environmental practices, with action plans implemented for continuous improvement.</p> <p>The Third-Party Due Diligence – Highlights 2022 report indicates that the management system's effectiveness is regularly reviewed at the corporate</p>

			level. Rio Tinto also provides regular training to ensure that due diligence competency requirements are met.
	31.b. Red Flag Identification Process	Fully meets	<p>The Know Your Third-Party Procedure has defined the criteria and results of country risk classification (including sanctioned, or restricted, or high risk, or low risk countries) to make the CAHRA determination.</p> <p>The latest version of Country risk classification is reviewed and updated in May 2023.</p> <p>OT did not have external sources during the assessment period, meaning the country of origin is Mongolia, which is not considered a CAHRA.</p> <p>No red flags were identified.</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	<p>Rio Tinto publicly communicates "Knowing our third parties" to describe the process of supply chain due diligence.</p> <p>Information on supply chain due diligence is annually reported on corporate level by Rio Tinto. And latest information is publicly disclosed in in Sustainability Fact Book 2022.</p> <p>The report is available here.</p>
	32. Transparency and Disclosure	Fully meets	<p>OT has publicly published Annual Report and Sustainability Report, which states environmental, social and governance performance. The report is prepared as per the GRI requirements.</p> <p>Additionally, OT has published a Financial Report in accordance with UK GAAP accounting practice. A third-party company conducts the financial audit.</p> <p>The parent company Rio Tinto is a founding member of the Extractive Industry Transparency Initiative (EITI) and have actively supported EITI's</p>

		<p>principles and global transparency and accountability standards. Transparency Statement and Taxes Paid Report are available on the company website.</p> <p>OT has also publicly published IESC Compliance Monitoring Report with the reporting date of 12 January 2022, on which they have disclosed their environmental performance and social performance.</p> <p>Public disclosure is available here.</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 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 20/05/2022.	<input checked="" type="checkbox"/>
The site is found to miss some or all the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some, or all 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 20/05/2022.	<input type="checkbox"/>
The site misses some or all 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:	Underground mine is excluded in this assessment scope. As the underground mine was not included in the audit scope and agenda, site visit to the underground mine was

	not planned. Due to limited time onsite, arrangement to the underground mine was unsuccessful.
Additional comments:	

Award

The Copper Mark	<input checked="" type="checkbox"/>
The Molybdenum Mark	<input type="checkbox"/>
The Nickel Mark	<input type="checkbox"/>
The Zinc Mark	<input type="checkbox"/>

This Summary Report is prepared using data from the independent accountant's assurance report and the independent assessor report. The Copper Mark confirms the assessors' opinion and awards the relevant metal Mark(s) as follows:

Date The Copper Mark is awarded	7 March 2024
Expiry Date of The Copper Mark	6 March 2027