



The Copper Mark Summary Report

Participant Information

Name of the Site	Saganoseki Smelter & Refinery
Unique identifier provided by the Copper Mark	P0037
Address	3-3382 Saganoseki Oita-shi, Oita, 879-2201
Country of Operation	Japan
Copper products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathode
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, gold, silver, platinum, palladium
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	Gold – LBMA Responsible Gold Guidance
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Fabrication	<input type="checkbox"/>
Other (<i>please explain</i>)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>

Rails	<input type="checkbox"/>
Ports	<input checked="" 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 <i>(Name, date of assurance / certification)</i>	Review Process	Criteria Covered by Equivalency
ISO 14001:2015 10 March 2022	<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 • Accompanied by improvement plans where applicable 	<ul style="list-style-type: none"> • 14. Environmental Risk Management • 16. Energy Consumption • 18. Waste Management • 20. Pollution
ISO 45001:2018 22 February 2021	<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 	12. Occupational Health and Safety

	<p>reassessment are underway</p> <ul style="list-style-type: none"> • 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 • Accompanied by improvement plans where applicable 	
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Independent Site Assessment Information

Name of the Lead Assessor	Mathew Nelson, Masaki Moro, Hironori Takamura, Kirsten Hengen, Koichi Watanabe
Name of the Assessment Firm (if applicable)	EY
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	<p>26 August 2022 – 17 October 2022</p> <p>Follow up assessment: completed across two time periods:</p> <ol style="list-style-type: none"> 1. September 7- October 30, 2023 2. February 5 – March 8, 2023
Assessment Period	1 January 2022 – 31 December 2022
Summary of the Assessment Methodology	<p>EY developed a reasonable assurance methodology, specific for Copper Mark, in accordance with the International Standard on Assurance Engagements (ISAE) 3000.</p> <p>This methodology included:</p> <ol style="list-style-type: none"> 1. Planning and assurance strategy <ul style="list-style-type: none"> • Kick off meeting with JX Nippon Mining & Metals Corporation counterparts. • Assessment of performance expectations of the Copper Mark criteria, including commitment to Copper Mark. • Risk assessment against Copper Mark criteria specific to Saganoseki Smelter & Refinery's operating context. • Development of specific procedures and approaches for the execution of the review

2. Execution

- Inspection of documentation, including policies, procedures, data and other relevant evidence.
- Virtual meetings with JX Nippon Mining & Metals Corporation professionals to understand existing processes and activities related to Copper Mark's performance expectations.
- Visit to the Saganoseki Smelter & Refinery's site, including interviews with workers and local stakeholders.
- Comparison of the results of Saganoseki Smelter & Refinery's self-assessment against the Copper Mark criteria, the evidence collected, and the observations shared during the interviews.
- Discussions on rating differences, supporting documentation, gaps, and plans to address identified gaps.

3. Conclusion

- Executive review of self-assessments.
- Drafting of the Detailed Report
- Drafting of the reasonable assurance statement
- Final review meeting with JX Nippon Mining & Metals Corporation and Saganoseki Smelter & Refinery to validate the rating, gaps, and plans to address the identified gaps.
- Finalization of the Detailed Report

4. Follow-up procedures

Completed similar activities to those outlined in steps 1-3 included above (including a site visit) to assess the gaps identified during the initial assessment.

The issue areas within scope for the follow-up assessment were;

- #3 Stakeholder Engagement
- #17 Freshwater Management and Conservation
- #21 Biodiversity and Protected Areas
- #24 Community Development
- #26 Human rights
- #30 Cultural Heritage
- #31 Due Diligence in Mineral Supply Chains(a. Management Systems e. Public Reporting)

Following these procedures additional documentation was requested and assessed for criteria #3, #24, and #31 a and e.

About the company: Saganoseki Smelter & Refinery is part of JX Metals Smelting Co., Ltd., a group company of JX Nippon Mining &

	<p>Metals Corporation (JX NMM), which is a subsidiary of ENEOS Holdings, Inc.</p> <p>In June 2023, JX Nippon Mining & Metals Corporation (NMM) changed the name to JX Metals Corporation. Therefore, some of the sections regarding the 2022 assessments are in the old notation, JX NMM.</p> <p>The site implements group policies from JXNMM.</p> <p>Direct employees: 496</p> <p>Contract employees: approximately 400</p>
<p>Summary of the Assessment Activities</p>	<ul style="list-style-type: none"> • In-person and virtual interviews were conducted with JX NMM and JX Metals Smelting Co., Ltd, Saganoseki Smelter & Refinery staff to understand the reporting process for the Self-Assessments, including a management interview, 2 interviews with representatives of the community, 2 interviews with 2 contractor workers and 14 interviews with employees (a mix of individual and group interviews, covering 20 workers). The interviewees from the workers were selected from the employee list provided from the site, considering a balance of sections, titles, and gender. For the community, the representatives of the community parties with which the site communicated frequently were selected. • The accuracy and completeness of the evaluated criteria were checked. • The applicability of the Copper Mark criteria for Saganoseki Smelter & Refinery was reviewed, and it was verified whether Saganoseki Smelter & Refinery has met, partially met or not, the criteria considered applicable. • Referenced documents and policies were inspected to assess whether the classification can be supported. • On-site inquiries were conducted with internal and external stakeholders to examine documentation and written evidence. Virtual interviews and evaluations conducted on 15 September 2022 were also taken into account. • Review of whether the information disclosed in the self-assessments is consistent with our understanding and knowledge of Saganoseki Smelter & Refinery's governance, responsibility and sustainability management as examined in the review of JX MNM's sustainability disclosures for fiscal year 2021 in its annual report.

Summary of Findings

Criterion	Rating	Comments
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	<i>Fully meets, partially meets, does not meet, not applicable</i>	<i>Includes link to publicly available documents or supporting evidence where possible and at a minimum for those criteria with an *</i>
1. Legal Compliance	Fully meets	<p>The JX Metals Group has developed the JX Metals Group Compliance Regulation, including activities such as education, guidance and inspection, establishment of internal structures and whistle-blowing systems. JX NMM is responsible for legal requirements, and the responsible department monitors updates of laws and regulations and shares them with the operating sites as necessary. Relevant updates are communicated through the intranet after revision of internal rules/regulations. If the case is critical, additional training is implemented.</p> <p>This was confirmed through interviews with management, interviews with workers who confirmed relevant training, site observations and a review of documents including the compliance regulation, notification email on amendments to laws, compliance education plan, and meeting notes.</p>
2. Business Integrity	Fully meets	<p>JX NMM has the JX Metals Group Anti-Bribery Rules to prevent any bribery, corruption and anti-competitive behaviour as well as a Checklist for Giving Gifts to Government Officials. These rules are applied to all the sites including Saganoseki Smelter & Refinery.</p> <p>This is supported by external surveys, internal audits, compliance training, and a compliance guidebook. There is an internal hotline available that receives 10 or so cases per year. At the time of the assessment, none of the cases raised through the hotline were related to business integrity.</p> <p>This was confirmed through interviews with management, interviews with workers, site observations revealing the “pocket card” that introduces the communication methods and procedure</p>

		to respond to whistleblowing, and a review of documents including compliance regulation, anti-bribery rules, training materials, forms and self-check sheets.
3. Stakeholder Engagement*	Fully meets	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>JX NMM has a stakeholder map and procurement policy that is applied at the site. At the Saganoseki Smelter & Refinery, the General Affairs Department is in charge of public affairs and acts as a point of contact for local residents. Local suppliers are selected/contracted by each department.</p> <p>There is a relationship with the local community through the Saganoseki Town council and Fisheries cooperative association of Oita.</p> <p>There is a grievance mechanism in the Customer Contact Point.</p> <p>There are two gaps identified:</p> <ul style="list-style-type: none"> • Saganoseki Smelter & Refinery does not have a site-level stakeholder map and process to regularly update it • There is no formal grievance policy or mechanism available for external stakeholders. Such mechanism shall be aligned with the UN Guiding Principles' Effectiveness Criteria. <p>This was confirmed through interviews with management, interviews with workers, interviews with community, and a review of documents including the materiality analysis, the ESG handbook, and the CSR procurement questionnaire.</p> <p>During the follow up assessment in September 2023, it was confirmed that a site-specific stakeholder map for Saganoseki Smelter & Refinery had been developed and has the process to regularly update it. JX Metals</p>

		<p>Corporation had also established a Supplier hotline in March 2023 for external stakeholders.</p> <p>JX Metals Corporation drafted the JX Metals Corporation Group Bylaws for Internal Reporting in March 2023 in accordance with the JX Metals Corporation Group Management rules for Whistleblowing based on the improvement plan for the grievance mechanism. This formal bylaw included the development of a formal grievance mechanism available for external stakeholders.</p> <p>Supplier reporting hotline can be accessed here.</p>
<p>4. Business Relationships</p>	<p>Fully meets</p>	<p>At the corporate level, there is a Basic Policy on Procurement and approach to sustainable procurement activities based on the policy as part of the environmental, social, and corporate governance (ESG) initiatives. At the site, each department in charge selects suppliers.</p> <p>Significant suppliers are determined based on transaction amounts. Saganoseki Smelter & Refinery requires these suppliers to respond to a CSR procurement questionnaire that includes all elements of the Basic Policy on Procurement. This includes, for example, questions around child labor, forced labor, and discrimination, among others.</p> <p>Hitachi Refinery has a process to review and respond to issues identified in the questionnaires. No issues were identified in 2019. The last version was sent in 2022.</p> <p>This was confirmed through interviews with management, interviews with a contractor, and a review of documents including the basic policy on procurement, the policy for selecting procurement partners, and the sustainability report.</p>

5. Child Labor	Fully meets	<p>Child labor is prohibited via the JX NMM's Compliance Regulation, Compliance Guidebook and Regulation, training on human rights and SDGs, Basic Procurement Policy and CSR survey. Job postings state that applicants must be 'high school graduates' (i.e., 18 years old or higher). Ages are confirmed upon hiring.</p> <p>No children were observed on site.</p> <p>This was confirmed through interviews with management, interview with a worker who had not witnessed child labor and confirmed the required age of employment, site observations, and a review of documents including training materials, group compliance information, and a sample job posting.</p>
6. Forced Labor	Fully meets	<p>Forced labor is prohibited via the JX NMM Compliance Regulation, Compliance Guidebook and Regulation, training on human rights and SDGs, Basic Procurement Policy and CSR survey. This is in line with national regulation prohibiting forced labor. It is checked through due diligence efforts for procurement of recycled products and copper concentrates.</p> <p>Site visits and interviews revealed no cases of suspected forced labor. There was no evidence of foreign technical intern trainee was observed on site.</p> <p>This was confirmed through interviews with management, interview with a worker who had not observed forced labor, site observations, and a review of documents including training materials, group compliance information, and the procurement questionnaire.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>Saganoseki Smelter & Refinery has adopted a union shop system, in which all non-managerial employees are, in principle, members. The labor union at the Saganoseki Smelter & Refinery is a branch of the JX NMM labor union. JX NMM deals appropriately with the</p>

		<p>workers' rights based on Japanese labor laws and regulations.</p> <p>Freedom of association is mentioned in the human rights and SDG training provided at the site.</p> <p>There is an agreement in place based on Labor Basic Act article 36 that defines overtime working hours as determined between the company and the labor union.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including training, results of labor-management consultations, and the agreement on overtime.</p>
8. Discrimination	Fully meets	<p>At the corporate level, non-discrimination is included in the JX Metals Group Compliance Regulation and relayed at Saganoseki through Human rights and SDGs training.</p> <p>In addition to the complaints hotline, there is an external harassment consultation desk.</p> <p>Workers stated that they had received training, understood what to do in the case of discrimination, and had not witnessed discrimination</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including compliance information, training materials, and training records.</p>
9. Gender Equality	Fully meets	<p>At the corporate level, gender equality is included in the JX Metals Group Compliance Regulation and compliance guidebook. Position-specific trainings (new employees, new managers, executives) covers gender equality according to the JX Metals Group Compliance Basic Plan. The activity plan for gender advancement is posted on the intranet, and the result is disclosed on the website of the Ministry of Health, Labor and Welfare.</p>

		<p>Training on human rights and SDGs including gender equality was provided to new managers at Saganoseki. Site-level progress toward the advancement plan is shared at JX NMM manager meetings.</p> <p>At JX NMM, there is a target of 30% female newly hired graduate employment in 2020. JX NMM discloses some data regarding women’s participation, such as the ratio of female workers among the workers hired, the ratio of female workers among workers, the ratio of female workers in managerial and executive positions, etc. on the database of the Ministry of Health, Labor and Welfare. This data is disclosed and monitored on an annual basis, available here.</p> <p>This was confirmed through interviews with management, interviews with workers and in particular female workers who stated, “they have not been treated unfairly as a woman or treated unfairly in promotions,” and a review of documents including the database of women participation training materials, and sample job posting.</p>
10. Working Hours	Fully meets	<p>At the corporate level, the JX Metals Group Compliance Regulation and compliance guidebook that covers fair working hours and their management in line with legal obligations to keep working hours at 40 hours per week and no more than 45 hours of overtime per month / 360 hours of overtime per year. Overtime working hours management is conducted based on agreement between the labor union and the company.</p> <p>Entry/exit times to the site are recorded by having employees themselves touch their admission cards to card reading equipment at gates when entering and leaving. Based on the time, employees apply their working hours to the time management system. Workers work in</p>

		<p>a day shift or 3-shift schedules with voluntary and tracked overtime.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including a sampling of working hour records, records of shift change discussions with trade unions, and booklet of the collective bargaining agreement.</p>
11. Remuneration	Fully meets	<p>Salaries, benefits, premium payment for overtime and work in holidays/nighttime are regulated. Wages exceed the specified minimum wages for non-ferrous metal manufacturing of Oita Prefecture, which is 936 yen per hour. Living wage is considered in the salary regulation.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including minimum wage data, salary slip examples, and pay regulations.</p>
12. Occupational Health and Safety	Fully meets	<p>Criterion confirmed as met through equivalency with ISO 45001:2018.</p>
13. Grievance Mechanism	Fully meets	<p>JX NMM has policies, practices and procedures that allow a grievance mechanism to be accessible to all workers. This process can be carried out anonymously. The JX NMM Hotline is managed first through an external organization before following internal procedures. Information on changes to the hotline is disseminated to all workers.</p> <p>This was confirmed through interviews with management, interviews with workers who confirmed knowledge of the hotline, and a review of documents including the Whistleblowing Management Rules, Procedure for Employee Grievance Mechanism, and notifications on changes.</p>
14. Environmental Risk Management	Fully meets	<p>Criterion confirmed as met through equivalency with ISO 14001:2015.</p>

<p>15. Greenhouse Gas (GHG) Emissions*</p>	<p>Fully meets</p>	<p>At JX NMM, there is a Group Basic Environmental Policy, which states that they will contribute to achieving a decarbonized society by promoting technological innovation and energy transition and aiming for zero greenhouse gas emissions. JX NMM has a 2050 net zero target and the intermediate target of JX NMM is 50% reduction in 2030 from the 2018 baseline. Goals are set through an internal company-wide project called Carbon-free Project. JX NMM targets are for scopes 1 and 2.</p> <p>The goals are set at the JX NMM level. Saganoseki Smelter & Refinery production technology section reports their GHG emission values to corporate.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the JX Nippon Mining & Metals Group Basic Environmental Policy, Carbon-free projects, and the annual sustainability report.</p> <p>More information is available here.</p>
<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>Criterion confirmed as met through equivalency with ISO 14001:2015.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>Saganoseki has implemented efforts for water management and conservation. These include an educational program on water savings, tracking of use of both industrial and seawater, Pollution Prevention Agreements with the site, the city and the prefecture, agreements with local fisheries, and control and monitoring of water quality in water discharge.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> • Saganoseki does not have a policy for freshwater management and conservation. There has not been a comprehensive assessment of

		<p>water-use impacts and risks at the site in relation to its internal and external stakeholders.</p> <p>This was confirmed through interviews with management, interviews with workers, interviews with the community, site observations, and a review of documents including the water risk analysis result, measurement data on exhaust wastewater, monitoring screen and pollution prevention agreements.</p> <p>During the follow up assessment in September 2023, it was confirmed that the site-specific Biodiversity and Water Risk Response Manual (Biodiversity and Water Manual) based on the JX Metals Group Environment Conservation Action Plan had been developed which assessed the site’s water impacts and risks. JX MS sent an email to the employees in relevant divisions communicating about the Biodiversity and Water Manual and the latest update of the action plan.</p> <p>In line with the Biodiversity and Water Manual, JX MS was evaluated by Aqueduct for the Saganoseki Smelter & Refinery in 2021 with water risks being assessed as Low- Medium (1-2).</p> <p>According to worker interviews, emergency response drills for wastewater incidents had been conducted.</p> <p>According to management interviews, the site uses water from three sources: municipal water, industrial water supplied by the Oita Prefectural Industrial Bureau, and a reservoir on the site. Water management on site included predicting operational water requirements and calculating actual water use volumes. In addition, when water levels in the reservoir drop below a certain level, the site’s “Doryoku” department implements water conservation activities by requesting water use reduction.</p>
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		The NPM Promotion Department is responsible for increasing water use efficiency by introducing water use reduction and conservation measures.
18. Waste Management	Fully meets	Criterion confirmed as met through equivalency with ISO 14001:2015.
19. Tailings Management	Not applicable	This criterion does not apply to non-mining entities.
20. Pollution	Fully meets	Criterion confirmed as met through equivalency with ISO 14001:2015.
21. Biodiversity and Protected Areas	Fully meets	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>Saganoseki has taken measures to avoid, minimize, reduce and compensate for adverse impacts on biodiversity. Saganoseki has undertaken an IBAT assessment. At the corporate level, discussion to work towards TNFD has initiated.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> • There is no management system to follow a mitigation hierarchy for the management of impacts on biodiversity. <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the environmental policy, code of conduct, and special article on conservation.</p> <p>During the follow up assessment in September 2023, it was confirmed that the Biodiversity and Water Manual included requirements to follow the mitigation hierarchy for the management of biodiversity impacts where the risk of impacting protected biodiversity areas was identified.</p>
22. Mine Closure and Reclamation	Not applicable	This criterion does not apply to non-mining entities.
23. Community Health and Safety	Fully meets	The JX Metals Code of Conduct explicitly states a commitment to maintaining and enhancing a harmonious relationship with a wide range of stakeholders, including

		<p>customers and the communities in their operation, and are committed to contributing to the sustainable development of society on a global scale. A similar commitment is in the JX NMM environmental policy.</p> <p>In support of this policy, Saganoseki has implemented a Pollution Prevention Agreement with Oita prefecture and Oita city, imposing stricter requirements on the site than those required by regulation to regularly measure the air emissions and the quality of the wastewater from multiple locations.</p> <p>This was confirmed through interviews with management, interviews with a contractor, interviews with representatives from the community, and a review of documents including the pollution prevention agreement, exhaust gas and wastewater data, the contract with local fisherman cooperative, the code of conduct, and the environmental policy.</p>
24. Community Development	Fully meets	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>There is a commitment to coexistence and co-prosperity with the community in the corporate philosophy. This is complemented by a number of development initiatives at the level of Saganoseki, including participation in the town council activities to revitalize the area through the sale of local products, communicating with and supporting the community such as with schools, regional development, recreational activities, donations, and other activities.</p> <p>One gap is identified:</p> <ul style="list-style-type: none"> • Saganoseki has not completed a formal needs assessment, in collaboration with internal and external stakeholders, to make their community development activities more effective and systematic.

		<p>This was confirmed through interviews with management, interviews with community representatives, and a review of documents.</p> <p>During the follow-up assessment in September 2023, EY observed records of correspondence between JX MS and stakeholders (i.e. residents) dating back to February 2023. JX MS had subsequently documented its understanding of the development needs of particular stakeholders and management interviews confirmed that it had considered how JX MS can support communities in the future.</p>
25. Artisanal and Small-Scale Mining	Not applicable	This criterion was confirmed to not apply. There are no ASM in the area of influence.
26. Human Rights	Fully meets	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>The parent company of JX NMM, ENEOS holdings, has a human rights policy and has completed a human rights assessment through an international human rights NGO based in Tokyo.</p> <p>At JX NMM, ESG issues including social and human rights are examined twice per year. Compliance trainings including training for human rights were conducted for all workers at the site every year. Nonetheless, not all workers were familiar with the human rights policy.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> Some workers are not aware of the human rights policy. <p>This was confirmed through interviews with management, interviews with workers, interviews with contractors, and a review of documents including the human rights policy of ENEOS, the due diligence report, and the training plan and records.</p> <p>During the follow up assessment in September 2023, it was confirmed that</p>

		<p>human rights education materials had been prepared and communicated to workers.</p> <p>The human rights education materials included information such as the need to address human rights issues, examples of human rights violations, and the availability of anonymous contact points.</p> <p>According to management, the human rights education was targeted at employees of the JX Group (including employees working at subsidiaries with capital ties) in the smelter. The educational materials were sent by e - mail in August 2023 and circulated by paper to employees who did not have PCs.</p> <p>According to the worker interviews, human rights education materials were shared.</p>
27. Security and Human Rights	Not applicable	This criterion does not apply to non-mining entities.
28. Indigenous Peoples' Rights	Not applicable	This criterion was confirmed to not apply. There are no indigenous peoples in the area of influence.
29. Land Acquisition and Resettlement	Not applicable	This criterion was confirmed to not apply. The site has no plan to expand its area if operation thus it is understood that land acquisition and resettlement are not applicable at the site.
30. Cultural Heritage	Fully meets	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>Saganoseki has taken actions to maintain and preserve the identified cultural heritage sites within the area of influence. Saganoseki Smelter & Refinery including its giant stack is becoming a cultural heritage and is preserved as a monument and subject of local tours.</p> <p>Two gaps were identified:</p> <ul style="list-style-type: none"> • There is no formal policy regarding cultural heritage.

		<ul style="list-style-type: none"> There are no procedures to identify and protect cultural heritage. <p>This was confirmed through interviews with management, interviews with community representatives, visits to cultural heritage sites, and a review of documents.</p> <p>During the follow up assessment in September 2023, it was confirmed that the site-specific manual for the Protection of Cultural Heritage had been developed and communicated internally.</p> <p>The Protection of Cultural Heritage Manual included a commitment to protect cultural heritage. In addition, procedures to identify and protect cultural heritage had been developed. This was confirmed through review of the Protection of Cultural Heritage Manual that included processes to identify culturally significant locations prior to new land development, locations of known culturally significant sites, and processes to protect culturally significant sites from adverse impacts.</p>
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>As of the follow up assessments, this criterion is fully meets.</p> <p>This criterion was partially covered by equivalence with the LBMA Responsible Gold Guidance. The assessment focused on the application of the joint due diligence standard for copper.</p> <p>Saganoseki has a medium complexity supply chain consisting of copper concentrate and recycled inputs from a few dozen suppliers and half a dozen countries of origin. Procurement is managed at Pan Pacific Copper Co., Ltd. (A subsidiary of JX NMM, a sister company of JX Metals Smelting Co., Ltd.).</p>
31.a. Management System	Fully meets	JX NMM has a Supply Chain Due Diligence Regulation that sets out the policy and procedures for the due

		<p>diligence management system including the responsible persons, management, the grievance mechanism, and document control.</p> <p>One gap was identified:</p> <ul style="list-style-type: none"> • Implementation of the due diligence system for copper concentrates is not complete <p>This is confirmed through interviews with relevant personnel and a review of documents, including the copper supply chain due diligence rules, implementation guidelines, training, and communication records.</p> <p>During the follow up assessment in September 2023, it was confirmed that a mineral supply chain due diligence system for copper concentrates had been implemented at Saganoseki. This was confirmed through observation of due diligence procedures and records and review of the due diligence reports of five suppliers selected at random from Saganoseki's complete list of copper concentrate purchases.</p>
31.b. Red Flag Identification Process	Fully meets	<p>JX NMM has a process to identify red flags, including implementing a procedure to identifying conflict-affected and high-risk areas. The red flags identification process is appropriate for the effective identification and confirmation of potential red flags.</p> <p>No red flags were identified.</p>
31.c. Risk Assessment Process	Not applicable	No red flags were identified for the assessment period.
31.d. Risk Management Process	Not applicable	No red flags were identified for the assessment period.
31.e. Public Reporting*	Fully meets	<p>JX NMM has published its LBMA report and will issue its first Step 5 report that includes copper in June 2023.</p> <p>During the follow up assessment, EY sighted the 2023 JX Metals Smelting Copper Responsible Sourcing Compliance Report (2023 JX Compliance Report) and noted that it</p>

		<p>included information on supply chain due diligence. EY noted that the JX Compliance Report was dated 20 December 2023.</p> <p>The JX Compliance Report is available here.</p>
32. Transparency and Disclosure*	Fully meets	<p>JX NMM discloses annual on ESG-related topics in accordance with GRI standard, including site-level data. JX Group supports and endorses of EITI.</p> <p>More information is available here.</p>

Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard.	<input checked="" type="checkbox"/>
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 23 March 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 23 March 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:	

Copper Mark 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 as follows

Date the Copper Mark is awarded (dd/mm/yyyy)	15 December 2022
Expiry Date of the Copper Mark (dd/mm/yyyy)	14 December 2025