



## Assessment Summary Report

### Participant Information

Name of the Site	Miami Smelter & Mine
Unique identifier provided by the Copper Mark	P0007
Address	701 New St., Claypool, AZ 85532
Country of Operation	United States of America
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Concentrate, anodes, SX/EW cathodes, wire rod
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Copper
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.)	N/A
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/> Note the site is no longer mining ore or operating the mining pits
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input checked="" type="checkbox"/>
Other ( <i>please explain</i> )	Rod mill
Infrastructure owned or controlled by the site and included in scope	

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

### Equivalent Systems

<p>The following equivalent systems were applied:</p> <p><i>Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the <a href="#">Copper Mark Recognition Process</a>.</i></p>		
Equivalent System	Review Process	Criteria Covered by Equivalency
<p>ISO 14001:2015 Valid until 3 July 2026</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> <li>Valid at the time of the review</li> <li>No more than 24 months old and / or plans for reassessment are underway.</li> <li>In effect for an additional 12 months and / or plans for reassessment are underway</li> <li>Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials</li> <li>Accompanied by improvement plans where applicable</li> </ul>	<p>14. Environmental Management Systems</p>
<p>ISO 45001 Valid until 29 January 2026</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> <li>Valid at the time of the review</li> <li>No more than 24 months old and / or plans for reassessment are underway.</li> </ul>	<p>12. Occupational Health and Safety</p>

	<ul style="list-style-type: none"> <li>• In effect for an additional 12 months and / or plans for reassessment are underway</li> <li>• Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials</li> <li>• Accompanied by improvement plans where applicable</li> </ul>	
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### Independent Site Assessment Information

Name of the Assessment Firm (if applicable)	Ernst & Young (EY)	
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Document review and prep: 15 August – 24 September 2023 Onsite: 25-27 September 2023	
Assessment Period	1 February 2021 – 27 September 27 2023	
Summary of the Assessment Methodology	<p>The assessors employed AICPA AT-C 205 and ISAE 3000 methodologies. The assessment consisted of a site visit to the Miami facility, interviews with employees, contractors, management and stakeholders, site walkthrough and documentation review. Pre-assessment activities included a review of the Copper Mark self-assessment report.</p> <p>The assessment was carried out using the ICMM performance expectations, and where relevant, the additional Copper Mark Top-off requirements and complementary information sourced from interviews, documentation review and observation.</p> <p>Permanent workers: 799 (Male: 672, Female: 127) Contract workers: 173</p>	
Summary of the Assessment Activities	<p>The assessment consisted of document review and preparation. While on site, the following activities took place:</p> <ul style="list-style-type: none"> <li>• Opening meeting</li> <li>• Site tour (mine, plant operation)</li> <li>• External stakeholder interviews including representatives from local authorities, suppliers, the local community, and indigenous groups.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Internal stakeholder interviews including representatives from workers (male and female), contractors, and management.</li> <li>• Closing meeting</li> </ul>
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## Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Miami has a management system to maintain compliance with applicable laws.</p> <p>Miami maintains compliance with all environmental obligations, which is further subject to internal and external audits at scheduled intervals. The site maintains a subscription to a comprehensive source of up-to-date regulatory compliance information, to maintain compliance with legal obligations and regulatory updates.</p> <p>The site also engages with the corporate legal team on a regular basis, including the Subject Matter Expert groups and the government relations groups.</p> <p>The human resources group also communicates and trains employees on labor-related laws and policies during its new hire orientation.</p> <p>This was confirmed by interviews with management and a review of documents including training material, annual audit program, meeting agendas, and environmental reports.</p>
2. Business Integrity	Fully meets	<p>Miami implements a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.</p> <p>Relevant policies are primarily driven by corporate's Principles of Business Conduct (PBC), which is implemented, applied, and understood by the site.</p> <p>The site monitors compliance with corporate policies by actively tracking</p>

		<p>employee completion of PBC and Anticorruption training.</p> <p>This was confirmed by interviews with management; and a review of documents including the Principles of Business Conduct, Code of Conduct for Business Partners, anticorruption guidelines, and relevant policies.</p>
3. Stakeholder Engagement	Fully meets	<p>Miami conducts stakeholder engagement based upon an analysis of the local context and provides local stakeholders with access to appropriate and effective mechanisms for seeking resolution of grievances related to the company and its activities.</p> <p>The site performs and maintains stakeholder maps for Miami's area of influence, documenting all engagements and interactions in Enablon.</p> <p>External grievance mechanisms are aligned with the UNGP Effectiveness Criteria for Non-Judicial Grievance Mechanisms, and both workers and communities can submit grievances in various ways. Site-level activities, including grievance management, are discussed with the local community at Quarterly Community Partnership Panels.</p> <p>During the assessment period grievances were filed related to categories such as health and safety, and environment.</p> <p>This was confirmed by interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including Freeports annual report, relevant policies and grievance files.</p> <p>The grievance mechanism is accessible at <a href="https://freeportinmycommunity.com">freeportinmycommunity.com</a>.</p>
4. Business Relationships	Fully meets	<p>Miami has policies and practices in place that are driven at both the site and corporate level to support the adoption of responsible health and</p>

		<p>safety, environmental, human rights and labor policies and practices by joint venture partners, suppliers, and contractors, based on risk. The process of determining “significant” suppliers was tested at site and implementation of supplier audits was confirmed with a supplier.</p> <p>A compliance database and questionnaire are used to screen and assess potential business partners and suppliers. All supplier contracts contain clauses related to Freeport and Miami's policies including Human Rights, Business Partner Code of Conduct, Anti-Corruption, Health &amp; Safety, and Social Performance policies. This is supported by additional training requirements for contractors and monthly contractor safety meetings.</p> <p>This was confirmed by interviews with management; interviews with a supplier and contractors; and a review of documents including the corporate annual report, relevant policies, contracts, and documentation regarding ESG due diligence.</p>
5. Child Labor	Fully meets	<p>Miami implements the corporate Human Rights policy, which states that child labor will not be tolerated.</p> <p>During onboarding, workers partake in a background screening process to confirm that they are over 18. Training is also provided to workers.</p> <p>This was confirmed by interviews with management; interviews with workers; site observation; and a review of documents including the human rights policy, communication campaigns, training files, and a sampling of personnel files.</p>
6. Forced Labor	Fully meets	<p>Miami implements the corporate Human Rights policy, which states that forced or compulsory labor will not be tolerated. Mechanisms are in place at Miami to identify, assess, and eliminate potential employment and human rights</p>

		<p>risks related to forced labor and human trafficking. Training is provided to workers.</p> <p>This was confirmed by interviews with management; interviews with workers; site observation; and a review of documents including relevant policies, communication campaigns, training files, and personnel files.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>Miami has in place policies, procedures, and practices to ensure they respect employees' rights to freedom of association and to collective bargaining. Miami also applies this policy to its suppliers and contractors through training.</p> <p>The site does not currently have a workers' union. Nonetheless, management provides training to employees as part of new-hire orientation on their rights to a workers' union.</p> <p>This was confirmed by interviews with management; interviews with workers; site observations; and a review of documents including the collective bargaining agreement and relevant policies.</p>
<p>8. Discrimination</p>	<p>Fully meets*</p>	<p>Miami follows the corporate Human Rights Policy, which states that no form of harassment will be tolerated, and policies, procedures and practices are in place to support this. Additionally, an Inclusion and Diversity Policy commits to providing fair access to opportunities, trainings, and promotions.</p> <p>At the corporate level, Freeport mandates training on the Principles of Business Conduct (PBC) and Guiding Principles which cover inclusion and diversity, and the site's policies around discrimination, harassment (including sexual harassment), and other abusive situations.</p> <p>While the site has policies, practices, and procedures in place to prevent and identify discrimination in all aspects of</p>

		<p>its employment practices, interviews indicated a perception of discrimination, particularly by individuals who identified as part of a minority group. This was primarily related to work assignments and lateral and upwards advancement. Upon review of promotion records from the site, the factual evidence identified that minority groups were laterally transferred or promoted at the same or higher rate of occurrence than the non-minority group within the Miami full-time employee population.</p> <p>Therefore, it is recommended that management continue their efforts to address the perception of discrimination through further communication with employees, additional trainings, formalized action plans, etc. Management corroborated their ongoing commitment and effort to advance communications with employees and further promote awareness and understanding of their policies, practices and procedures to prevent discrimination. This includes improvements within the sites grievance mechanism.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the Human Rights Policy, personnel files, including promotion records, and grievance files.</p> <p>*ICMM performance expectation 3.4 maps to Copper Mark Criteria 8 and 13 as per the equivalency mapping. Please see conclusion on criteria 13 below.</p>
9. Gender Equality	Fully meets	Miami implements policies and practices to respect the rights and interests of women that reflect gender-informed approaches to work practices and job design, and that protect against all forms of discrimination and harassment, and behaviors that adversely impact on women’s successful participation in the



		<p>workplace. Additionally, Miami provides training on Pregnancy Accommodation and Lactation laws to front line supervisors.</p> <p>At the corporate level, Freeport performs a gender pay gap analysis each year across all sites, concluding that women are paid .997 cents to the \$1 men are paid. Upon completion, a list of employees potentially facing inequity is provided to Freeport, prompting them to review and adjust pay accordingly.</p> <p>While interviews indicated a perception of a gender pay gap, it was not substantiated.</p> <p>This was confirmed by interviews with management; interviews with workers, including women; site observations; and a review of documents the gender pay gap study, discrimination and sexual harassment policy, and grievance log, annual sustainability reports and personnel files.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>Freeport has a Working Hours &amp; Fatigue Management Policy that states that working hours shall not exceed 60 hours per week on average over a period of a calendar month unless it is done with voluntary, approved overtime. This policy also requires on average at least one rest day in seven. Human resources personnel are given training on this policy, and it is communicated to contractors and suppliers through their contracts and during the onboarding process.</p> <p>Workers are granted time off, and overtime is voluntary. Additionally, it was confirmed that hourly workers are paid extra for anything over 40 hours.</p> <p>A comprehensive review of Freeport's Q4'2022, Q2'2023 and Q3'2023 Working Hours Analysis for North America, including hours worked at Miami, found some employees at Miami worked over 60 hours averaging</p>

		<p>over a month during the quarter (approximately 0.5 - 1.5% of total employees). While the assessors were not able to conclude that these were isolated incidents or due to emergency or unusual work situations, the percentage of employees working over 60 hours per quarter was determined to be insignificant in relation to the total population, and it was confirmed these hours were voluntary elections by the employees.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the relevant policies, personnel files, and a sampling of wage and time records.</p>
11. Remuneration	Fully meets	<p>Miami has policies and procedures in place to provide fair wages and abide by national laws. Corporate performs a living wage analysis for sites on an annual basis, and employee wages at Miami exceeded the living wage threshold for the area they operate in.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the relevant policies, personnel files, and a sampling of wage and time records.</p>
12. Occupational Health and Safety	Fully meets	<p>Miami is ISO45001 group certified and has a functioning ISO45001 safety management system. The site also adopts and implements the Corporate Health &amp; Safety policy, and advocates for being 'fit for duty,' which includes psychological aspects.</p> <p>Multiple health &amp; safety audits are performed by both the site and corporate. During the 2022 Corporate Internal ISO Audit for Miami, Corporate identified one observation and two minor weaknesses. A Corrective/Preventative Action Request and Root Cause Analysis (RCA) form was completed and included immediate action plans to be taken, as well as</p>

		<p>notes on progress/closure, all of which is tracked and closed in the Incident Management System.</p> <p>Necessary PPE is provided to workers and there has been an improved focus on Health &amp; Safety since the site began partaking in ISO certifications, according to workers.</p> <p>There is signage related to Fatal Risks and hazards, traffic safety precautions, as well as proper wearing of PPE.</p> <p>The site has processes in place to review potential significant or hazardous risks associated with tasks. The site implements the Corporate Fatal Risk Management program and has a 'Stop work' procedure. They have a standard protocol for the reporting of incidents and the lines of communication.</p> <p>Miami also closely monitors and reports on health &amp; safety KPIs, which are reviewed monthly with safety managers, tracked by Corporate and included as part of the Freeport Annual Sustainability Report.</p> <p>Furthermore, the site has a designated training department that is responsible for developing training curriculum based on corporate policies. Completion and requirements are monitored through a training system.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including relevant policies, incident reports and training documentation.</p>
<p>13. Grievance Mechanism</p>	<p>Partially meets</p>	<p>The site has an internal grievance mechanism in place that allows for both anonymous and named reporting of grievances. Internal grievances are tracked through designated systems, and documentation related to the grievances are maintained within these systems.</p>

		<p>Alongside the grievance mechanism, the site also has a Problem-Solving Procedure, with a specific Problem-Solving Specialist. This procedure is described to employees during onboarding, and it is specifically designed for employment related concerns, such as claims that the company policies/procedures have been violated, that the employer has violated an employee's rights under state or federal law, or if an employee would like to appeal a decision that has been made against them.</p> <p>Testing indicates that grievances are appropriately investigated, aligned with processes, and handled confidentially.</p> <p>This was confirmed through site observations; interviews with management; interviews with workers; and a review of documents including personnel files, a sampling of grievance files, and relevant policies.</p> <p>The following gap was identified relating to the effectiveness of the grievance mechanism: The grievance mechanism does not meet the UNGP effectiveness criteria as it was determined to lack trust from the stakeholder groups for whose use they are intended. This determination was evidenced through interviews in which employees indicated concerns regarding: (1) grievances reported to supervisors but not filed by the supervisors; (2) a desire to better understand the grievance process, timeline and results; and (3) concerns that the intent or purpose of the grievance mechanism is not well or fully understood.</p>
14. Environmental Risk Management	Fully meets	Miami maintains certification of their Environmental Management System under ISO 14001:2015, which includes

		<p>commitments to the corporate environmental policy. Equivalency has been recognized for this criterion.</p>
<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>Miami measures and reports GHG emissions annually, which are reported publicly through corporate's annual sustainability report.</p> <p>Miami's reduction targets are in line with the corporate 2030 GHG emissions targets. Miami aims for a 15% reduction in scope 1 and 2 emissions intensity by 2030 compared to the 2018 baseline, with an aspiration for net zero by 2050.</p> <p>To achieve these goals, initiatives include for example incorporating on-site solar panels, EV charging stations, and implementing a new Employee Vanpool.</p> <p>This was confirmed through site observations; interviews with management; and a review of documents including monitoring results, and relevant policies.</p> <p>More information is available <a href="#">here</a>.</p>
<p>16. Energy Consumption</p>	<p>Fully meets</p>	<p>Miami annually measures, monitors, and publicly discloses its energy consumption in the corporate sustainability report.</p> <p>The site continually seeks energy-saving opportunities through projects aligned with operational needs and cost considerations, assessed within Miami's Management of Change process. While there are no specific site-level reduction targets, efforts are directed towards supporting the corporate-level reduction target.</p> <p>The site has multiple energy efficiency initiatives in place, such as installing on-site solar panels.</p> <p>This was confirmed through site observations; interviews with management; and a review of</p>

		documents including, monitoring results, and relevant policies.
17. Freshwater Management and Conservation	Fully meets	<p>Miami implements water stewardship practices that provide for comprehensive and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>Miami has a Long-Term Water Strategy, with the goals of improving efficiency and ensuring adequate and sustainable long-term water supply. The site has identified actionable water risks related to groundwater and pit lakes, developing clear action plans with detailed risk descriptions, critical controls, responsible parties, and target completion dates.</p> <p>The site maintains a Water Accounting Balance to track and report various water metrics. Weekly water management updates provide detailed information on inventory levels, updates, and strategic focus areas to relevant personnel.</p> <p>Water use in Arizona is tightly regulated, involving multiple authorities in water rights designation. Hence, the site has agreements and collaborations with local communities, particularly in Wastewater Treatment.</p> <p>This was confirmed through site observations; interviews with management; interviews with external stakeholders; and a review of documents including relevant policies, monitoring data and annual sustainability reports.</p>
18. Waste Management	Fully meets	<p>Miami applies the mitigation hierarchy to manage releases and waste and address potential impacts on human health and the environment.</p> <p>Miami assesses the hazards of the products of mining according to relevant regulatory systems and</p>

		<p>communicates through safety data sheets and labelling as appropriate.</p> <p>There is proper containment and handling of on-site waste, sources of potential pollution are controlled, and waste is managed according to the type and disposal method required.</p> <p>Miami maintains a detailed flow diagram showing the material and waste management throughout the operations.</p> <p>Employees receive training annually on hazardous substances and have online access to safety data sheets for all chemicals and hazardous materials used at the site.</p> <p>The site also operates a Resource Recycling program, outsourcing the recycling of non-hazardous by-products to an external vendor. The majority of by-products is sold back to the Miami and El Paso Freeport sites in a closed loop. Internally, there is also a recycling program for copper recovery, as well as a contracted service for the handling of scrap metal for recycling.</p> <p>This was confirmed through site observations; interviews with management, interviews with external stakeholders; and a review of documents including, safety data sheets, monitoring results, and relevant policies.</p>
19. Tailings Management	Fully meets	<p>Miami's Tailings Dams are no longer in function and are considered safely closed tailings storage facilities as defined by the Global Industry Standard on Tailings Management (GISTM). A safely closed Tailings Storage Facility (TSF) does not pose ongoing material risk to people or the environment, according to the site's Independent Tailings Review Board (ITRB).</p> <p>As they are deemed safely closed, there is a reduction in obligations under GISTM and the site's TSF management is largely driven by internal</p>

		<p>requirements. Miami performs regular monitoring of the TSFs, such as monthly Dam Safety inspection sheets, Piezometer updates, and Engineer or Record Inspections. Additionally, the site maintains a Tailings Storage Facility Emergency Action Plan.</p> <p>The site communicates with Community stakeholders regarding its TSF's safe closure status during its recurring Community Partnership Panel meetings.</p> <p>This was confirmed through site observations; interviews with management; interviews with external stakeholders; and a review of documents including safety closure documents, monitoring results, and relevant policies.</p>
20. Pollution	Fully meets	<p>Miami applies the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment. The site is also ISO 14001 certified.</p> <p>The site's primary pollution and waste-related risks are sulfuric acid emissions from the smelter and ground water contamination. Action plans addressing these risks, outlined in the risk register, follow the mitigation hierarchy. For example, Miami has a Hazardous Air Pollutant Emissions plan which involves reducing emissions emitted from the smelter building roofline.</p> <p>The site has a Management of Change process that is a systematic method for managing changes so that impacts of these changes are fully understood, with the goal of avoiding any undue risks and events to workers, the environment, and community.</p> <p>Miami conducts regular environmental monitoring and reports annually on waste, water, and air quality metrics. Lastly, the site completes annual Toxic Chemical Release Inventory reporting,</p>



		<p>which includes reporting for each chemical that exceeded an applicable threshold in the prior calendar year.</p> <p>This was confirmed through site observations; interviews with management; interviews with external stakeholders; and a review of documents including monitoring results, and relevant policies.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Fully meets</p>	<p>Miami has policies and procedures in place to assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy.</p> <p>Impact to biodiversity is regularly monitored as part of site's risk register update, with a complete review occurring annually and additional updates performed on an as needed basis. The site performs vegetation and species monitoring through allotment surveys and video monitoring. When needed, they will collaborate with the Fish and Wildlife service.</p> <p>Miami holds gold certification from the Wildlife Habitat Council until December 2024.</p> <p>This was confirmed through site observations; interviews with management; interviews with external stakeholders; and a review of documents including monitoring results, and relevant policies.</p>
<p>22. Mine Closure and Reclamation</p>	<p>Fully meets</p>	<p>Miami mining operations have been curtailed since 2015 and are presently undergoing remediation activities at various stages. These remediation activities are performed in communication with and oversight from ADEQ (Arizona Department of Environmental Quality) and stakeholders.</p> <p>Additionally, on a quarterly and annual basis, certain closure events that could possibly impact the cash flow estimates and timing for asset retirement obligations for Miami are identified and</p>

		<p>disclosed within Freeport's 10Q and 10K filings.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of documents including relevant policies and mine closure plans.</p>
23. Community Health and Safety	Fully meets	<p>Miami implements risk-based controls to prevent, minimise, mitigate and/or remedy physical and psychological health and safety and environmental impacts to local communities, based upon recognized international standards. Additionally, the site develops, maintains, and tests emergency response plans, collaborating with external stakeholders when risks are significant.</p> <p>Air and water quality are managed and monitored, and internal stakeholders have received training on handling accidental discharges.</p> <p>Miami adopts and implements the Corporate Social Performance Management System and annually completes a site Social Performance Plan which details site risks and opportunities with a social nexus, activities to address the risk and stakeholders involved. Mitigation efforts include environmental monitoring outreach at quarterly Community Partnership Panel meetings and targeted engagement with involved stakeholders, a grievance management system and, completion of an HRIA in 2022 (refer to Criterion 26 for further information)..</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of documents including relevant policies, stakeholder map, and grievance files.</p>
24. Community Development	Fully meets	<p>Miami has policies in place to enable access by local enterprises to procurement and contracting opportunities across the project life</p>

		<p>cycle, both directly and by encouraging larger contractors and suppliers, as well as by supporting initiatives to enhance economic opportunities for local communities.</p> <p>Under these policies, Miami has implemented Stakeholder mapping, quarterly Community Partnership Panels where Miami hosts forums with the local community, strategic social investments in categories such as Education &amp; Training, Health &amp; Wellness, Environment, and Community Safety, and various community initiatives such as programs to upskill the future Miami workforce.</p> <p>In 2022, Miami procured 49% of its goods and 68% of its service locally.</p> <p>External stakeholders expressed appreciation for Miami’s investment in education, positive relationship with local community members, and aid in the aftermath of natural disasters.</p> <p>This was confirmed through interviews with management; interviews with external stakeholders; and a review of documents including relevant policies, stakeholder map, and grievance files.</p>
25. Artisanal and Small-Scale Mining	Not applicable	The assessment confirmed there is no ASM in the area of influence.
26. Human Rights	Fully meets	<p>Miami has mechanisms in place to assess potential and actual human rights risks and impacts for this site primarily follow corporate guidelines and policies, such as the Responsible Sourcing Policy, Human Rights Policy, Principles of Business Conduct and Social Performance Policy. Employees, contractors receive mandatory training on the matter.</p> <p>Miami has implemented site-specific mechanisms relating to human rights, such as their Building Trust with Tribal Nations SOP, and have an external grievance mechanism in place that’s</p>

		<p>aligned with the UNGP criteria for effectiveness.</p> <p>Stakeholders support the conclusion that they have not been the subject of adverse human rights impacts.</p> <p>In 2022, the site conducted an HRIA, and feedback received is being actively addressed through the development and implementation of action plans, with documented progress by Miami management. Additional information on the site's HRIA methodology can be found <a href="#">here</a>.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; online research; and a review of documents including the code of ethics and relevant policies.</p>
<p>27. Security and Human Rights</p>	<p>Fully meets</p>	<p>Miami has policies and procedures in place that implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.</p> <p>Miami does not have security contractors as the need for security personnel is minimal. All security crew members are employed by Miami. through review of the internal employee and contractor listing provided by Human Resources. As aligned with Arizona state law, security personnel may be armed.</p> <p>In the recent HRIA, private security forces were assessed as low impact. Voluntary Principles training is completed on a risk-basis and is not required for Miami due to the low-risk nature of security activities.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; online research; and a review of documents including relevant policies.</p>

<p>28. Indigenous Peoples' Rights</p>	<p>Fully meets</p>	<p>Miami has in place policies and procedures that work to obtain the free, prior, and informed consent (FPIC) of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage and capture the outcomes of engagement and consent processes in agreements.</p> <p>Miami is in a historic mining town, and notably it is the only mining company in the local area that has not had an appeal filed by San Carlos Apache Tribe, the tribe closest to operations. Miami has no formal opposition from any Native American tribes.</p> <p>Assessments confirmed that there are no recent or ongoing projects where significant adverse impacts are likely to occur and therefore for which FPIC would apply, however the site still follows the spirit of it through their stakeholder holder engagement and consultation processes, using The Building Trust with Tribal Nations SOP, which includes: 1. Completion of biological and cultural surveys and sharing of knowledge to interested tribes; 2. Development and roll-out of Cultural Sensitivity Trainings to integrate the Building Trust approach beyond the Native American Affairs team and to the site Community Development and Environmental teams; 3. Various community programs and social investments; and 4. An external stakeholder grievance mechanism.</p> <p>There have not been any reported adverse impacts on indigenous peoples' rights from the Miami Operations. Some representatives expressed that the current tribal leadership has a good relationship with Miami.</p> <p>This was confirmed through interviews with management; interviews with</p>
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		<p>workers; interviews with external stakeholders including indigenous peoples' groups; and a review of documents including stakeholder mapping of Miami, relevant policies, and descriptions of social development projects.</p>
<p>29. Land Acquisition and Resettlement</p>	<p>Fully meets</p>	<p>Miami adopts the Corporate Social Performance Policy and Social Performance Management systems, which integrates the mitigation hierarchy and early stakeholder engagement as related to any potential impacts and resettlements.</p> <p>Miami operations currently does not have any plans for expansion or new land acquisitions. Further, Miami's is no longer actively mining ore.</p> <p>While Miami operations are located in the same regional area as tribal lands, , management confirm that there is presently no physical or economic displacement.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including stakeholder mapping of Miami and relevant policies.</p>
<p>30. Cultural Heritage</p>	<p>Fully meets</p>	<p>Miami implements risk-based controls to prevent, minimise, mitigate and/or remedy impacts to cultural heritage sites based upon a recognised international standards.</p> <p>The site also adopts and implements the Corporate Social Policy, which states commitments to 'respect the cultural heritage, tangible and intangible cultural values, interests, livelihoods and aspirations of Indigenous Peoples including their physical, spiritual and cultural connection with the land and local environment.'</p> <p>Cultural heritage is also addressed within the SPMS with a Cultural Heritage Standard of Practice, which is adopted and implemented by the site.</p>

		<p>One of the primary focuses of this SOP being the goal of engaging local communities in processes to jointly identify and agree upon mitigation plan(s) for negative impacts on cultural heritage.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including stakeholder mapping of Miami and relevant policies.</p>	
<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>Freeport-McMoRan has comprehensive and established policies, processes, and management frameworks in place, which fully align with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals for Conflict Affected and High-Risk Areas and the Copper Mark Joint Due Diligence Standard.</p> <p>Miami is fully covered by these systems.</p> <p>This was confirmed through interviews with management; and a review of documents including the Corporate/Sales &amp; Marketing SOPs for implementation of the 5-step process for implementation of the OECD guidelines in mineral purchases, review of minerals supply chains and Freeport-McMoRan assessment of red flag issues and associated management actions at the site, and the process for assessing risk in purchases of goods and services.</p>	
	<p>31.a. Management System</p>	<p>Fully meets</p>	<p>At corporate level, there is a publicly available Responsible Sourcing of Minerals Policy, supplier questionnaires, a Conflict Affected and High Risk Areas (CAHRA) identification tool, and training to support implementation.</p> <p>The policy is overseen by the Sustainability Leadership Team at corporate level and implemented at site. Miami primarily uses its own</p>

			<p>material, though it occasionally sources concentrates and scrap for parts of the operations.</p> <p>Authorities and accountabilities and resources are well allocated proportional to the size and complexity of the operations. Senior leadership is responsible for review and revision of the system.</p> <p>There are channels to address supply chain concerns early and remediate impacts, which are described in the Business Partner Code of Conduct, the Principles of Business Conduct, and at Fcx.com.</p>
	31.b. Red Flag Identification Process	Fully meets	<p>At the corporate level, there is a process to identify CAHRAs.</p> <p>The Freeport-McMoRan CAHRA assessment has determined that the USA is not a CAHRA.</p> <p>No red flags were identified regarding the location of the Miami operation (USA) or its external sources.</p>
	31.c. Risk Assessment Process	Not applicable	Not applicable as no red flags were identified.
	31.d. Risk Management Process	Not applicable	Not applicable as no red flags were identified.
	31.e. Public Reporting	Fully meets	The corporate Step 5 report covers the management system implementation at Miami. It is available <a href="#">here</a> .
	32. Transparency and Disclosure	Fully meets	<p>Miami publicly supports the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project.</p> <p>Additionally, while EITI is not enacted in the USA, the site's cash payments to the US government are reported to Freeport Corporate and disclosed as part of the Annual Sustainability Report, which is available <a href="#">here</a>.</p>

## Conclusions



<b>Statement of conformance</b>	
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 18 September 2025.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some, or all of the applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 18 September 2025.	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment and / or for Criterion 31, the applicable criteria of the Joint Due Diligence Standard. The Site has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
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	22 March 2024
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Expiry Date of The Copper Mark	21 March 2027
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