



The Copper Mark Assessor Management Procedure

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I. Introduction

The Copper Mark Assessor Management Procedure details the process for the approval, monitoring, and evaluation of individual assessors and assessment firms.

Assessors and assessment firms are required to follow the policies and procedures of the Copper Mark as well as uphold a high-level of integrity and ethical behavior.

II. Types of Applicants

The Copper Mark approves senior-level individuals with extensive knowledge and practical experience in implementing or assessing the subject matter covered by the [Copper Mark standards](#) at the types of entities eligible for an assessment against these standards.

The Copper Mark reviews and approves individual assessors. Assessors may be contracted by a site either individually or through their firm to assess and verify conformance to the Copper Mark standard(s) in accordance with the [Copper Mark Assurance Process](#). The specific roles and responsibilities are outlined in the Assurance Process. Outsourcing of assessment responsibilities including decision-making to anyone not approved by the Copper Mark is strictly prohibited.

Note regarding Interpreters and technical experts: Assessors may utilize interpreters or technical experts in the assessment. These individuals must be independent of the site. The names and affiliations of these experts must be included in the report.

III. Approval Process

A. Qualifications

Assessors will be approved by the Copper Mark based on the following requirements:

Objectivity	<p>Assessors must be independent¹ of the company being evaluated and its supply chain to ensure the objectivity, confidentiality, and non-existence of conflicts of interest.</p> <p>Assessors cannot have been employed directly by or provided consulting or advisory services related to the scope of The Copper Mark Criteria to the site within the last three (3) years.</p> <p>Assessors must disclose any business or financial relationship with or financial interest in the site or entities in its supply chain within the scope of the assessment. Potential conflicts of interest will be evaluated by the Copper Mark.</p>
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¹ Assessors should be independent of the activity being assessed wherever practicable, and should in all cases act in a manner that is free from bias and conflict of interest (adapted from ISO 19011:2018)

	Assessors cannot have provided any consulting services to the site or its supply chain entities within the scope of the assessment within the past three (3) years.
Experience	Experience conducting assessments of a similar scope under another scheme or current certification as a management system auditor from a recognized assessment body that includes an examination or other competency verification component.
Expertise	<p>Demonstrated knowledge, understanding, and at least five (5) years working experience in the implementation, maintenance, or auditing of the following applicable areas in mining and/or in smelting and refining:</p> <ul style="list-style-type: none"> • Environmental management systems, including but not limited to biodiversity conservation, water stewardship, and impact assessments; • Occupational health and safety management systems; • Labor, industrial relations, and human resources management systems; • Social impact assessments and human rights due diligence in accordance with the UN Guiding Principles for Business and Human Rights; • Community relations and stakeholder engagement; • Compliance and ethics; • Mineral supply chain due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; • Tailings management; • Sustainability reporting.
	Demonstrated skills and experience performing stakeholder interviews in local communities through culturally appropriate means.
	Knowledge of ISO 19011 Guidelines for Auditing Management Systems or ISAE 3000 International Standard on Assurance Engagements.
Qualifications	Completion of university degree in a relevant field.
	Completion of The Copper Mark training modules as assigned.
	Experience and proficiency of at least one Assessor in the country and national language of the relevant site(s). Translators may be

	used to supplement other Assessors in the team who are not proficient in the local language.
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Since the assurance process and standard are the same, the Copper Mark does not differentiate assessors approved for the Copper Mark from other metal marks.

Assessors who apply for approval to assess the Joint Due Diligence Standard only must meet all of the requirements with the exception of section on expertise. In this case, assessors shall demonstrate knowledge, understanding, and at least five (5) years working experience or ten (10) audits of **mineral supply chain due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas** in mining, smelting, or refining.

Assessors must follow the guidance in Annex III related to verification of tailings management.

All assessors approved to conduct assessments against the Joint Due Diligence Standard are also approved to conduct assessments against the Chain of Custody Standard.

The Copper Mark maintains an up-to-date list of approved Assessors that includes a description of their competencies in line with the requirements above; evidence of qualifications; conflict of interest disclosures; confidentiality agreements; training records; and results of The Copper Mark observations, including any pending improvement actions.

A site may only contract the same assessor for 3 assessment cycles (i.e., up to 9 years). At that time, the site must switch assessors.

Assessors may utilize interpreters or technical experts in the assessment. These individuals must be independent of the site. The names and affiliations of these experts must be included in the report.

B. Training Requirements

Assessors are required to undergo the following Copper Mark training courses prior to conducting an assessment against Copper Mark standards:

- The Copper Mark Assurance Process 101
- The Copper Mark Metals 101

Assessors are required to undergo the following additional Copper Mark training courses prior to conducting an assessment against the Joint Due Diligence Standard, either stand-alone or as part of an assessment against the Copper Mark Criteria:

- Joint Due Diligence Standard

Once every three years, assessors are also required to complete the following courses offered by the Copper Mark:

- Revised standard criteria training (as appropriate)
- Joint Due Diligence Standard Refresher Training

Additional required and recommended trainings may be assigned to maintain approval as appropriate. The Copper Mark may accept equivalent training in lieu of the above on a case-by-case basis.

The Copper Mark will maintain records of successful training completion.

C. Application

Applicants who wish to be approved and listed on the Copper Mark’s [website](#) may submit a completed application with supporting evidence and send it to info@coppermark.org. Supporting evidence shall include for each individual the following information, as applicable in the application:

Objectivity	Disclose in the application (and on an ongoing basis) any business or financial relationship with or financial interest in the site or entities in its supply chain within the scope of the assessment within the last 3 years.
Experience	Evidence of experience conducting assessments of a similar scope, such as: <ul style="list-style-type: none"> • CV • Audit logs including information on auditee, standard applied, role in audit, methodology applied (ISAE 300, ISO 19011, other), and date • Sample assessment reports (these may be redacted of confidential information) • Professional auditing certifications
Expertise	Evidence to demonstrate knowledge, understanding, and at least five (5) years working experience in the implementation, maintenance, or auditing in the mining and metals industry for one or more of the subject-matter expertise, such as: <ul style="list-style-type: none"> • Description of type of experience (implementation, maintenance, or auditing) in the mining and metals industry • Years engaged in each type of experience • CV

	<ul style="list-style-type: none"> • Audit logs including information on auditee, standard applied, role in audit, methodology applied (ISAE 300, ISO 19011, other), and date • Sample assessment reports (these may be redacted of confidential information)
Qualifications	<p>Completion of university degree in a relevant field as evidenced by:</p> <ul style="list-style-type: none"> • CV • Certificate or diploma <p>Language ability as evidenced by:</p> <ul style="list-style-type: none"> • Application • CV • Certificate or diploma • Country of birth • Country of residence <p>Geographical understanding as evidenced by:</p> <ul style="list-style-type: none"> • Countries in which experience has been gained • Countries in which audits have been conducted

For the application to be accepted, each individual applicant must sign a declaration tab. Note that typed names will not be accepted.

D. Review and Decision

The Copper Mark staff will review the application and supporting materials. The Copper Mark may request additional evidence or documentation to support adherence to one or more requirements where appropriate. Using the information provided, the Copper Mark will make a determination whether the individual applicant is:

- Fully approved
- Approved with limitations based on subject-matter expertise, familiarity with types of operations, language ability, and / or geographical experience
- Not approved

Applicants may re-apply for approval once they meet the requirements.

E. Public Information

The Copper Mark will publish on its website the following information for individuals associated with an assessment firm:

- Company name and link to website
- Contact name
- Contact email
- Contact phone number
- Geographic scope
- Any limitations as identified by the Copper Mark

The Copper Mark will publish on its website the following information for approved Assessors who are not affiliated with an approved assessment firm:

- Name
- Contact email
- Contact phone number
- Geographic scope
- Any limitations as identified by the Copper Mark

IV. Monitoring and Evaluation

A. Monitoring Process

The Copper Mark may use the following methods to continually monitor and evaluate assessor performance, as well as contribute to the continuous improvement of the Copper Mark Assurance Process:

- Assessment records: the Copper Mark reviews every report for adherence to program expectations. A detailed list of what the Copper Mark reviews is available in Annex I.
- Shadow assessments: where Copper Mark staff or observers accompany an assessment.
- Training records: as required to maintain approval or through corrective action / continuous improvement plans.
- Feedback provided by participants
- Grievances lodged against assessors / assessment firms through [the Copper Mark Grievance Mechanism](#)

On an annual basis, the Copper Mark will review assessor performance data to ensure consistent application of the Copper Mark standards. This review will entail at a minimum a review of the interpretation and application of the Copper Mark standards among:

- Assessors
- Assessment firms
- Geographies
- Auditing methodologies (i.e., ISO and ISAE)
- Equivalent systems

The Copper Mark will also review changes to the ISO 19011 Guidelines for Auditing Management Systems or ISAE 3000 International Standard on Assurance Engagements to ensure they continue to meet expectations of the Assurance Process.

B. Outcomes

a. Assessors

If during the monitoring and evaluation there is an issue identified in regard to the assessors ability to adhere to the Assurance Process or any other relevant policy or procedure, the Copper Mark will notify the assessor of the issue and engage to develop a path for improvement. The nature of the improvement plan will vary based on the issue identified but may include additional training or quality control measures.

The Copper Mark will use suspension and / or termination only as a method of last resort when the individual either:

- Does not participate in the improvement plan; or
- Does not complete the improvement plan satisfactorily; or
- Engaged in any of the actions listed below giving right to immediate suspension or removal of the assessor or assessment firm.

The Copper Mark reserves the right to suspend or remove an assessor immediately for any of the following reasons:

- Violation of the Copper Mark policies and procedures, including but not limited to use of non-approved assessors or undisclosed conflicts of interest.
- Ethical breach of conduct including but not limited to bribery, misrepresentation, or plagiarism.
- Breach of confidentiality.

- Where the actions or inactions of an assessor or assessment firm present a reputational risk to the Copper Mark.

b. Assurance Process

The Copper Mark will integrate findings from the review into the Assurance Process revision as appropriate.

C. Communication

The Copper Mark will keep a record for each individual listing all completed assessments, identified issues, improvement plans and resolutions throughout the year and share them upon request.

The Copper Mark may annually provide aggregated performance data to Copper Mark leadership and other stakeholders as appropriate.

Assessors who have questions about this document may contact the Copper Mark at info@coppermark.org.

Annex I: Copper Mark Report Review

The Copper Mark reviews every independent review report and every assessment report that is submitted for the Copper Mark Assurance Process Step 3: Independent Assessment. The Copper Mark will look at three areas and record any issues or concerns that might arise and address them directly with the assessor / firm.

The three broad areas are applicable to both the independent review report and the assessment report. The sub-bullets below are specific to the assessment report.

Process

- Has the assessor been approved by the Copper Mark for all criteria / geographies / types of organizations covered in the Independent Assessment?
- Does the assessment report cover all the required elements as detailed in Section 5 of the Copper Mark Assurance Process?
- Was the scope of the assessment in accordance with the scope determined by the Copper Mark?
- Were risk areas identified by the Copper Mark included / highlighted / clear?
- Were all relevant assessment activities included?
- Did the assessor take a risk-based approach, using information from the self-assessment and Independent Review Report?
- Is there sufficient information to demonstrate the assessment was completed in accordance with the expectations (ISO 19011 or ISAE 3000, triangulation, independence)?
- Were all deliverables provided within a timely manner?

Substantive

- Are there any misunderstanding or misinterpretation of the requirements or expectation for any criteria of the Copper Mark standards?
- Has the assessor applied the expectations as detailed in the Copper Mark standards?

Behavior / Professionalism: Has the Copper Mark identified any of the following:

- Violation of the Copper Mark policies and procedures, including but not limited to use of non-approved assessors, undisclosed conflicts of interest.
- Ethical breach of conduct including but not limited to bribery; misrepresentation; plagiarism
- Breach of confidentiality
- Reputational risk to the Copper Mark
- Continued late report submissions