



Assessment Summary Report

Participant Information

Name of the Site	Nexans LENS Plant
Unique identifier provided by the Copper Mark	P0044
Address	Boulevard du Marais 62301 Lens
Country of Operation	France
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper rod-drawn wire
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.)	NA
Types of operations included in scope	
Mining	<input type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input checked="" type="checkbox"/>
Other (please explain)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input type="checkbox"/>

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

Equivalent Systems

The following equivalent systems were applied:

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

Equivalent System	Review Process	Criteria Covered by Equivalency
ISO 14001:2015 Validity: 9 November 2020 – 8 November 2023 with plans for re-certification	The assurance / certification was confirmed to be: <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 17. Freshwater Management and Conservation 18. Waste Management 20. Pollution

Independent Site Assessment Information

Name of the Lead Assessor	Soledad Mills
Name of the Assessment Firm (if applicable)	TDi Sustainability
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Site visit: 9-10 May 2023 Follow up assessment: 10 th April 2024
Assessment Period	May 2022 – May 2023

<p>Summary of the Assessment Methodology</p>	<p>The methodology used for the assessment consisted of a site visit to the Nexans facility in Lens, interviews with employees, management and stakeholders, site walkthrough and documentation review. Pre-assessment activities included a review of the Copper Mark self-assessment report, documentation submitted by Nexans and a desktop review of French laws and regulations and NGO and news reports and articles about the company.</p> <p>The assessment was carried out based on the ISO 19011: Guidelines for Auditing Management Systems following the triangulation methodology, looking at complementary information sourced from interviews, documentation review and observation.</p> <p>Permanent workers: 152 Temporary workers: 18 Contract workers: 6 security guards</p>
<p>Summary of the Assessment Activities</p>	<p>The assessors gathered and reviewed information submitted to the Copper Mark in preparation for the site-assessment, as well as throughout the time on site.</p> <p>The interviews were planned to cover relevant stakeholder groups. The sample was defined based on the total number of individuals for each group, with the goal of achieving an even representation from identified sub-groups (e.g.: female and male workers). The team encountered a limitation (see Limitations section below).</p>

Summary of Findings

Criterion	Rating	Comments
<p>1. Legal Compliance</p>	<p>Fully meets</p>	<p>Nexans Lens has a management system that effectively ensures they are fully compliant with all national legal requirements and with international conventions and law where these are required nationally.</p> <p>Nexans' Code of Ethics requires compliance with the laws and regulations. There is a legal specialist who monitors and updates the legal requirements for all of Nexans' facilities in France and communicates any changes to the relevant department heads, in addition to other sources of changing legislation. There are no current legal cases pending against Nexans Lens. Legal compliance is reported annually in the universal registration document.</p>

		<p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the Nexans Code of Ethics and Business Conduct, universal registration, and a media scan.</p>
<p>2. Business Integrity</p>	<p>Fully meets</p>	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>Nexans Lens has in place a documented management system or process that effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.</p> <p>The Nexans Code of Ethics and Business Conduct provides the framework for responsible business conduct at the Nexans Group level and explicitly states that it applies to all employees within the Group.</p> <p>All employees, clients, suppliers, sub-contractors, shareholders, and third parties can report violations of the Code of Ethics and Business Conduct using the incident report system. There is no record of an ethics violation at the site.</p> <p>Training is provided during onboarding of workers and regularly for management.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Most operational employees were not familiar with the Code of Ethics. It was recommended that the company re-communicate the Code of Ethics to employees, especially as it covers many aspects of the Copper Mark criteria. <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the Nexans Code of Ethics and Business Conduct, universal registration, and a media scan.</p>

		<p>During the follow up assessment in April 2024, the assessor verified that Nexans Code of Ethics and Business Conduct, mandatory for employees and partners, was reinforced during a training session with awareness raising and evaluations. Interviews confirmed widespread awareness of the Code and the training among workers.</p> <p>The reviewed evidence indicates that the corrective actions have been fully implemented.</p>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>As part of Nexans' Code of Ethics and Business Conduct, the company supports a dialogue with communities and representatives of civil society. Management engages with various stakeholders as needed, and stakeholders can lodge complaints with the site.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • There is no formal procedure to identify stakeholders. • There is no formal procedure to document and respond to stakeholder complaints. • Nexans LENS has not evaluated the alignment of its grievance mechanism with the UN Guiding Principles' Effectiveness Criteria for Non-Judicial Grievance Mechanisms. <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the Nexans Code of Ethics and Business Conduct, universal registration, and a media scan.</p> <p>The grievance mechanism is available here or here.</p>

		<p>During the follow up assessment in April 2024, the assessor verified that the Nexans Lens site has established a formal process to identify stakeholders and is implementing a stakeholder engagement plan. A procedure for documenting and responding to stakeholder complaints has been put in place. Additionally, the facility has evaluated and aligned its grievance mechanism with the UN Guiding Principles' Effectiveness Criteria for Non-Judicial Grievance Mechanisms.</p> <p>The reviewed evidence indicates that the corrective actions have been fully implemented.</p>
<p>4. Business Relationships</p>	<p>Fully meets</p>	<p>Nexans Lens communicates with and directly engages significant business partners to promote responsible business practices.</p> <p>There is a supplier CSR charter, which requires suppliers to commit to respect fundamental corporate social responsibility (CSR) principles, in the areas of human rights and labor standards, the environment, and the fight against corruption. Nexans suppliers are required to commit to the CSR principles for all their activities and sites and ensure that their own suppliers adhere to similar principles.</p> <p>There is a process to assess suppliers before the relationship begins, complemented by ongoing monitoring, including on-site CSR audits where necessary, throughout the relationship.</p> <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; interviews with a supplier who confirmed knowledge and understanding of the CSR charter; and a review of documents including the supplier CSR charter, supplier contract, supplier CSR scorecards, and documentation regarding ESG due diligence.</p>

<p>5. Child Labor</p>	<p>Fully meets</p>	<p>Nexans Lens has in place policies, procedures and practices that ensure against the employment of individuals under the age of 18. Nexans Lens also applies this policy to its suppliers.</p> <p>Nexans' Code of Ethics and Business Conduct states that the company is committed to compliance with the legal working age set by local legislation and does not employ children under the age of 16. Apprenticeships may be carried out from the age of 16 respecting local legislation, as this professional experience is a pre-requisite for their education on condition that the health, safety and morals of the young persons concerned are fully protected.</p> <p>There are procedures in place to support this policy, including through human resources. Currently, there are apprentices on site, all of whom are over the age of 18.</p> <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; site observation; and a review of documents including the supplier CSR charter, personnel files, and the universal registration document.</p>
<p>6. Forced Labor</p>	<p>Fully meets</p>	<p>Nexans Lens has in place policies, procedures and practices to prevent the use of forced labor. Nexans Lens also applies this policy to its suppliers.</p> <p>Nexans' Code of Ethics and Business Conduct states that the company ensures the elimination of forced or bonded labor, prison labor and trafficking in persons within its direct and indirect operations.</p> <p>Where staffing agencies are used, Nexans Lens pays the recruitment fees.</p> <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; site observation; and a review of documents including the supplier CSR charter,</p>

		<p>personnel files, and the universal registration document.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>Nexans Lens has in place policies, procedures and practices to ensure they respect employees' rights to freedom of association and to collective bargaining. Nexans Lens also applies this policy to its suppliers.</p> <p>Nexans' Code of Ethics and Business Conduct states that the company respects the right of employees to freely express themselves, form or join the unions and workers organizations of their choice and to participate in collective negotiations. The Code further states that Nexans recognizes the role and responsibilities of our employee representatives and is committed to communicating, negotiating and bargaining collectively with them.</p> <p>Nexans Lens has three active unions, though not all workers are members of a union. The collective bargaining agreement (CBA) applies to all employees regardless of whether they are a member of the union or not. The CBA is negotiated annually at the Group level. The agreement covers several areas of working conditions including compensation, benefits, hours, bonuses, health and safety, and equitable treatment. The CBA is reviewed every trimester with the union representatives.</p> <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the collective bargaining agreement, supplier CSR charter, and the universal registration document.</p>
<p>8. Discrimination</p>	<p>Fully meets</p>	<p>Nexans Lens has in place policies, procedures and practices to identify and prevent discrimination in all aspects of employment practices including recruitment, hiring, compensation, benefits, work</p>

		<p>assignments, access to training, advancement, discipline, termination and retirement. Nexans Lens also applies this policy to its suppliers.</p> <p>Nexans' Code of Ethics and Business Conduct states that the company is committed to creating an environment that guarantees equal opportunities for all and a workplace where equality, respect and consideration for one another are the norm. It also states that the company is committed to creating and maintaining a work environment in which people are treated with dignity, decency and respect. The company commits to creating a work environment free from intimidation, oppression, exploitation or harassment.</p> <p>The company has a zero-tolerance policy towards any form of harassment, violence or intimidation against employees.</p> <p>The whistleblowing system allows employees to anonymously alert any improper behavior or conduct, without retaliation. There is also annual training, direct lines to supervisors, and an ombudsman for harassment through the trade union to which any employee can go. This representative stated no recent cases.</p> <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the diversity and inclusion policy, personnel files, and the supplier CSR charter.</p>
9. Gender Equality	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>At the group level, Nexans has in place public policies, procedures and practices on gender equality and monitors progress on implementation to address gender inequality in the workplace.</p>

		<p>For several years, the company has had a “Women in Nexans” or WiN program, that has been working to ensure equality in the workplace between women and men, including equal pay. The program works to foster a sense of belonging among employees by creating an inclusive work environment.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Nexans Lens has no female employees at the operational level. • Nexans Lens does not have female lavatories in the work areas. <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the diversity and inclusion policy, personnel files, and the supplier CSR charter.</p> <p>During the follow up assessment in April 2024, the assessor verified that Nexans sets site-level KPIs, advertises internships to attract female candidates, and are planning an expansion project to include female lavatories and other facilities.</p> <p>The reviewed evidence indicates that the corrective actions have been fully implemented.</p>
10. Working Hours	Fully meets	<p>Nexans Lens has a management system to keep employees' regular and overtime working hours within legally required limits.</p> <p>The Nexans' Code of Ethics and Business Conduct states the company follows local legislation regarding hours of work and ensures all employees have at least one day of rest per week.</p> <p>Employees in the Lens facility work shift rotations, rarely including overtime. Overtime hours are paid at a higher rate in accordance with French law. Workers receive 1 day off in 7, as well as annual leave.</p>

		<p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the diversity and inclusion policy, personnel files, wage and time records, and the supplier CSR charter.</p>
11. Remuneration	Fully meets	<p>Nexans Lens has in place a management system to pay employees wages that equal or exceed the national minimum wage and meet the average local industry wage.</p> <p>According to the Nexans' Code of Ethics and Business Conduct, Nexans guarantees the minimum wages set by local legislation and ensures regular payment to the employee. The salaries are established in the collective bargaining agreement which is negotiated at the Group level.</p> <p>The Human Resources department monitors the salaries and benefits according to the collective bargaining agreement. Sampled salaries were nearly double the country minimum wage.</p> <p>This was confirmed by interviews with management; interviews with workers and a trade union representative; and a review of documents including the diversity and inclusion policy, personnel files, wage and time records, and the collective bargaining agreement.</p>
12. Occupational Health and Safety	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>Nexans Lens has developed an internal management system to manage health and safety risks and is broadly aligned with ISO 45001.</p> <p>Nexans Lens requires that all employees adhere to hygiene, health, and safety regulations. Additionally, Nexans Lens provides training for employees on job-specific health and safety risks.</p>

	<p>There is a quality, health, safety and environment manager who is responsible for ensuring the effective implementation of the management system provisions and continuously striving to enhance the system's efficiency. The company deploys objectives and action plans and regularly monitors health and safety risks to identify areas for improvement. The company is audited by the head office annually to verify implementation of group-level safety standards.</p> <p>A number of metrics are monitored and tied to specific objectives such as fewer work-related injuries or accidents.</p> <p>During the assessment, various safety measures were observed at the facility. Nexans Lens implements a number of safety protocols, including the provision of personal protective equipment (PPE).</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • There is insufficient emergency evacuation signage in the drawing workshop. • There are insufficient risk assessments. • There is insufficient training (for employees, contractors, and regular visitors including truck drivers). • There are not enough safety campaigns. <p>This was confirmed through site observations; interviews with management; interviews with workers and a trade union representative; and a review of documents including the quality, health, safety, and environment policy, safety statistics, accident analysis documentation, safety golden rules, and internal audit reports.</p> <p>During the follow up assessment in April 2024, the assessor verified that evacuation signs are visible in all areas and that there is an increase in risk</p>
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		<p>assessments facilitated by a digital platform. There are enhanced safety measures in place for visitors, truck drivers and delivery suppliers.</p> <p>The reviewed evidence indicates that the corrective actions have been fully implemented.</p>
<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>Nexans Lens has a grievance mechanism for employees. Although the grievance mechanism has not been formally evaluated against the UN Guiding Principles' Effectiveness Criteria for Non-Judicial Grievance Mechanisms, it is trusted by employees and involves trade union representation in implementation of the mechanism and resolution of grievances.</p> <p>Any Nexans employee can report a violation of the Code of Ethics and Business Conduct confidentially or anonymously via the online whistleblowing mechanism which is operated by a third party. A local hotline number is also available. Employees can also speak with their direct supervisor, the elected worker representative or the Human Resources manager. Employees are informed of these different channels and signs are posted in the work areas with information about the whistleblowing mechanism.</p> <p>Records of the process are kept; however, none were filed over the assessment period.</p> <p>There is an opportunity for improvement to assess the effectiveness against the UN Guiding Principles' Effectiveness Criteria for Non-Judicial Grievance Mechanisms.</p> <p>This was confirmed through site observation; interviews with management; interviews with workers and a trade union representative; and a review of documents including personnel files, universal declaration document, and the code of ethics.</p>

14. Environmental Risk Management	Fully meets	The assessment confirmed Nexans Lens has a valid ISO 14001 certificate.
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>Nexans Lens collects, analyzes and publicly reports GHG emissions according to internationally recognized protocols and has established reduction targets which are monitored over time.</p> <p>Nexans Lens' quality, health, safety, and environment policy includes a commitment to reducing the environmental impact of operations by implementing an ecological transition plan to reduce carbon emissions by 42% by 2030, aligned with the Group's overall target. At the Group level, Nexans has subscribed to the Science Based Targets Initiative, reports to CDP, uses the GHG Protocol, and has joined the Climate Group's Renewable Energy (RE)100 initiative. The company has committed to achieving 100% renewable electricity by 2030.</p> <p>Nexans Lens is undertaking a number of activities to reduce emissions including equipment and machine upgrades, energy efficiency measures, and transportation optimization. The Lens facility has established energy efficiency KPIs which are measured on monthly and annual basis.</p> <p>This was confirmed through site observations; interviews with management; interviews with workers and a trade union representative; and a review of documents including the quality, health, safety, and environment policy, the ISO 14001 surveillance audit report, and an action plan based on an energy audit.</p> <p>More information is available here.</p>
16. Energy Consumption	Fully meets	The assessment confirmed Nexans Lens has a valid ISO 14001 certificate, and this criterion is covered in its scope.
17. Freshwater Management and Conservation	Fully meets	At the Group level, the Environment and Product Committee oversees environmental compliance, including

		<p>water management. Water is also identified as a key risk area in the company's CSR risk assessment.</p> <p>At the facility level, Lens has established a commitment to reduce water consumption as part of its HSE policy and in line with Group level targets. The facility has reduced water use by approximately 13% between 2019 and 2022. The Lens facility has also set targets for reducing water discharges to <20 m3/month from the wire drawing operation and <40 m3/month in the casting operation. According to the most recent ISO 14001 surveillance audit report, the facility has achieved its objectives to reduce water discharge from both operations and is regularly testing water quality.</p> <p>The Lens facility is monitored twice a year by EUROFINS, a laboratory testing service which conducts analyses of the groundwater aquifer, as well as by local authorities.</p> <p>This was confirmed through site observations; interviews with management, interviews with workers; interviews with a trade union representative; and a review of documents including the ISO 14001 surveillance report, evidence of audits and inspections from local government authorities, and the code of ethics.</p>
18. Waste Management	Fully meets	The assessment confirmed Nexans Lens has a valid ISO 14001 certificate, and this criterion is covered in its scope.
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	The assessment confirmed Nexans Lens has a valid ISO 14001 certificate, and this criterion is covered in its scope.
21. Biodiversity and Protected Areas	Not applicable	Lens is a small city located in the Nord-Pas-de-Calais region of northern France. While the region does have

		<p>some natural areas and parks, the region is mostly characterized by agricultural land, urban areas, and industrial zones. The facility is in an industrial area outside of the town that was previously a coal mining area. The facility was established in 1855 and has been operated by Lens since 1979. The facility does not operate in or near any protected areas or world heritage sites. The closest nature reserve is 27km away.</p>
<p>22. Mine Closure and Reclamation</p>	<p>Not applicable</p>	<p>This criterion is not applicable to non-mining operations.</p>
<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>Nexans Lens has developed and implemented a management system to avoid, minimize, and reduce adverse impacts on community health and safety. The regulatory context in which the company operates provides access to compensation and remediation for communities in case of adverse impacts.</p> <p>The Nexans Code of Ethics and Business Conduct states that the company respects the rights of communities by identifying, preventing and mitigating impacts on the local environment and way of life. As part of Nexans Lens' quality, health, safety and environment policy, the company commits to ensuring there are no accidental discharges into the natural environment.</p> <p>Nexans Lens maintains regular interactions with various administrative bodies to ensure compliance with regulations and address potential incidents. These interactions include annual sessions with the fire brigade to enhance their familiarity with the facility in case of emergencies. Additionally, exercises are conducted to improve the water network and ensure sufficient coverage in the event of a fire.</p> <p>This was confirmed through site observations; interviews with management; interviews with workers</p>

		and a trade union representative; and a review of documents including the environmental crisis plan, code of ethics, and universal declaration document.
24. Community Development	Fully meets	<p>Nexans Lens has established a foundation at the group level that primarily focuses on countries where there is a significant need for projects related to the provision of electricity. Each year, the foundation supports approximately 10 projects aimed at addressing such needs.</p> <p>There is one case where the community asked for sponsorship of a local museum, with which Nexans Lens complied.</p> <p>Nexans Lens has not specifically carried out a community needs assessment, however, the socio-economic context in which the company operates, which is in a high-income country, is considered low risk for this criterion.</p> <p>This was confirmed through interviews with management; interviews with workers; interview with a trade union representative; and a review of documents including the code of ethics, press releases, and media scan.</p>
25. Artisanal and Small-Scale Mining	Not applicable	Assessment confirmed there is no artisanal and small-scale mining in the area of influence.
26. Human Rights	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>Nexans Lens has in place policies, procedures and practices to ensure they respect human rights. Nexans Lens applies the policy to suppliers.</p> <p>At the group level, Nexans has publicly communicated its support for fundamental human rights and freedoms. The Code of Ethics and Business Conduct states that the company is committed to respect</p>

		<p>human rights as set out in the UN Universal Declaration of Human Rights and has adopted a Human Rights Charter that is integrated into the Code. The Charter provides an overview of the principles that Nexans apply all along its value chain and within the communities in which it operates. In addition, the group encourages all suppliers it works with to enforce the policy.</p> <p>At the group level, the company evaluates the human rights performance of suppliers through the EcoVadis platform's questionnaire as part of the sustainable purchasing program.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • There is no specific commitment to implementing the UN Guiding Principles on Business and Human Rights. • There are not established procedures to conduct human rights due diligence. <p>This was confirmed through interviews with management; interviews with workers and a trade union representative; and a review of documents including the code of ethics and the supplier CSR charter.</p> <p>During the follow up assessment in April 2024, the assessors verified a process that outlines the company's approach to human rights, referencing the UN Guiding Principles on Business and Human Rights, with plans to include this reference in the upcoming version of the Code of Ethics.</p> <p>Nexans conducts human rights due diligence, supported by a draft procedure covering 12 identified Human Rights issues across its Business Groups, with internal controls in place to manage risks. A human rights questionnaire is distributed annually to assess partner maturity</p>
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		<p>levels, with support provided for remediation measures. External audits of suppliers are also conducted based on risk levels. Additionally, Nexans has established a governance structure overseen by the Governance and Social Affairs Committee to further develop its CSR policy, ensuring compliance with the procedure published in May 2024.</p> <p>The corrective actions have been fully implemented.</p>
27. Security and Human Rights	Not applicable	This criterion is not applicable to non-mining operations.
28. Indigenous Peoples' Rights	Not applicable	France does not have officially recognized or self-identified Indigenous groups. The company does not have a specific policy on Indigenous Peoples, however, given the context in which the Lens facility operates, the assessors concluded that implementing site-specific policies and procedures on Indigenous Peoples is not applicable.
29. Land Acquisition and Resettlement	Not applicable	Nexans Lens has not purchased any land in the last several years. Given the context in which the Lens facility operates, the assessors concluded that implementing site-specific policies and procedures on land acquisition and resettlement is not applicable.
30. Cultural Heritage	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>Nexans Lens has supported cultural heritage projects. While there is no specific policy on cultural heritage although culture is identified as one of the areas of focus for supporting local initiatives as stated in the Nexans Code of Ethics and Business Conduct. At the group level, there is also a commitment to enhance cultural and industrial heritage as part of the company's corporate philanthropy. In 2011, Nexans Lens entered into a sponsorship agreement with the</p>

		<p>Louvre-Lens Museum, to further its support of cultural heritage projects.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Cultural heritage is not incorporated into the CSR commitments. • There is no process to manage risks to culture and heritage associated with its activities that is based on consultation with stakeholders. <p>This was confirmed through interviews with management; and a review of documents including the code of ethics and universal registration document.</p> <p>During the follow up assessment in April 2024, the assessors verified improvements in cultural consideration through community engagement and collaboration with local authorities, supported by positive feedback from interviews. Additionally, Nexans sponsors community activities, such as protecting Notre Dame Cathedral with fire safety technologies. Biodiversity impact assessments are conducted for sites near sensitive areas, with mitigation measures outlined in the Universal Registration document. These actions align with the recommended criteria, indicating fulfillment of cultural heritage standards.</p> <p>The corrective actions have been fully implemented.</p>
<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>Nexans Lens has elements of an OECD-aligned due diligence management system. This includes aspects of a responsible supply chain policy in the code of ethics and business conduct, a “conflict minerals” program for tin, Know-Your-Counterparty and supplier monitoring,</p>

		<p>internal material control, a whistleblower hotline.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> Nexans Lens does not currently have in place a complete OECD-aligned due diligence management system covering copper. <p>During the follow up assessment in April 2024, the assessor verified that the site has implemented a supplier CSR risk methodology, assessing performance based on social, environmental, purchasing, and ethical criteria. Nexans Lens conducts due diligence for copper purchasing, including external validation and specific investigations. Risk levels determine due diligence procedures, with a focus on high-risk countries. Nexans aligns its copper sourcing procedure with the OECD Due Diligence Guidance and produces a coherent due diligence report as part of its Vigilance Plan.</p> <p>The corrective actions have been fully implemented.</p>	
	31.a. Management System	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>This includes aspects of a responsible supply chain policy in the code of ethics and business conduct, a “conflict minerals” program for tin, Know-Your-Counterparty and supplier monitoring, internal material control, a whistleblower hotline.</p>
	31.b. Red Flag Identification Process	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p> <p>The current practices do not cover OECD and Annex II risks for copper.</p>
	31.c. Risk Assessment Process	Fully meets	<p>As of the follow up assessment on 10th April 2024, the site fully meets this criterion.</p>

			(Previous gap: the current practices do not cover OECD and Annex II risks for copper.)
	31.d. Risk Management Process	Fully meets	As of the follow up assessment on 10 th April 2024, the site fully meets this criterion. (Previous gap: the current practices do not cover OECD and Annex II risks for copper.)
	31.e. Public Reporting	Fully meets	As of the follow up assessment on 10 th April 2024, the site fully meets this criterion. (Previous gap: the current practices do not cover OECD and Annex II risks for copper.) Information is publicly reported here. The corrective actions have been fully implemented.
32. Transparency and Disclosure		Fully meets	At the group level, the company reports annually on environmental, social and governance (ESG) performance in line with internationally recognized standards, including GRI-G4 Indicators, the UN Global Compact, the Sustainability Accounting Standard (SASB), and the Taskforce on Climate-related Financial Disclosures (TCFD). The company's integrated annual report incorporates corporate social responsibility reporting on ESG indicators across a few areas, including GHGs, waste, water, energy, accident rates, diversity data, and philanthropy. The document is available on the company's website and is distributed to key stakeholders including investors, employees, and suppliers. The following gap was identified: <ul style="list-style-type: none"> • There is no reference to the Extractives Industries Transparency Initiative (EITI) in policies or reporting, such as a statement of support for the EITI. More information is available here.

		<p>During the follow up assessment in April 2024, the assessor verified that Nexans has incorporated a mention of the EITI on its website within the Impact section. The statement urges suppliers to embrace and uphold EITI principles, aligning with Nexans' dedication to responsible and transparent mineral production.</p> <p>The corrective actions have been fully implemented.</p>
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Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment.	<input checked="" type="checkbox"/>
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 10 May 2024.	<input type="checkbox"/>
The site is found to miss some or all the applicable criteria of the Risk Readiness Assessment. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 10 May 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:	<p>Site visit: 9-10 May 2023</p> <p>The assessment team did not meet with any external stakeholders besides a supplier and one of the trade union representatives.</p> <p>A meeting with the mayor's office was requested by the assessors but no response was received. The company did not provide a list of stakeholders in advance besides the list</p>

	<p>of trade unions. No additional stakeholders were identified during the pre-assessment research.</p> <p>Follow up assessment: 10th April 2024</p> <p>There were no limitations to this assessment. There was sufficient time allocated to fully assess the CIP and conclude the progress made.</p>
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	26 July 2023
Expiry Date of The Copper Mark	25 July 2026