



RESPONSIBLY  
PRODUCED  
COPPER



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PRODUCED  
MOLYBDENUM



RESPONSIBLY  
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NICKEL



RESPONSIBLY  
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ZINC

## Assessment Summary Report

### Participant Information

Name of the Site	Mantos Blancos
Unique identifier provided by the Copper Mark	P0053
Address	Ruta Panamericana Norte, Km 1405, Antofagasta
Country of Operation	Chile
Principle covered products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper concentrate, copper cathode
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper, silver
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper, silver
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	NA
Types of operations included in scope	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input type="checkbox"/>
Other ( <i>please explain</i> )	
Infrastructure owned or controlled by the site and included in scope	

Roads	<input checked="" 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
NA	NA	NA

### Independent Site Assessment Information

Name of the Lead Assessor	Rachelle Jackson and Juliana Villegas
Name of the Assessment Firm (if applicable)	Arche Advisors
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	<p>June 17-21, 2023</p> <p>Follow up assessment criterion 12: November 14, 2023</p> <p>Follow up assessment: 19 – 20 June 2024</p>
Assessment Period	May 2022 - May 2023
Summary of the Assessment Methodology	<p>The assessment was conducted using the ISO 19011:2018 methodology against the Copper Mark Criteria for Responsible Production and the Joint Due Diligence Standard. The assessment methodology included data gathering through site visits to the mine operation and community; observation, worker and management interviews, and document review of policies, procedures, and records related to each of the specific Copper Mark criteria. A sampling approach was used related to document selection and worker selection, including contractor agencies. Greater specifics are included in detail in each criteria section of this report.</p> <p>Permanent workers: 900</p> <p>Contract workers: 3,500</p>
Summary of the Assessment Activities	<p>The assessment consisted of document review and preparation. While on site, the following activities took place:</p> <p><u>Day 1</u></p>

	<ul style="list-style-type: none"> <li>• Opening meeting</li> <li>• Mine tour (pit, storage)</li> <li>• Review of information related to Environmental Risk Management, Greenhouse Gas (GHG) Emissions, Energy Consumption, Freshwater Management and Conservation, Waste Management, Pollution, Biodiversity and Protected Areas, Mine Closure and Reclamation, Cultural Heritage, Child labor, Forced Labor, Freedom of Association and Collective Bargaining, Discrimination, Gender Equality, Working hours.</li> </ul> <p><u>Day 2</u></p> <ul style="list-style-type: none"> <li>• Mine tour</li> <li>• Review of information related to Occupational Health and Safety, Community Health and Safety, Tailings Management, Artisanal and Small-Scale Mining, Indigenous Peoples' Rights, Land Acquisition and Resettlement, Stakeholder Engagement, Grievance Mechanism, Community Development, Remuneration, Business Integrity</li> </ul> <p><u>Day 3</u></p> <ul style="list-style-type: none"> <li>• Employee interviews (direct, contractor and union representatives)</li> <li>• Review of information related to Security and Human Rights, Legal Compliance, Human Rights, Transparency and Disclosure, Business Relationships, Due Diligence in Mineral Supply Chains</li> </ul> <p><u>Day 4</u></p> <ul style="list-style-type: none"> <li>• External interviews</li> </ul> <p><u>Day 5</u></p> <ul style="list-style-type: none"> <li>• Closing meeting</li> </ul>
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### Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	Mantos Blancos has in place a documented management system that effectively ensures compliance with national legal requirements and with international conventions.

		<p>Capstone corporate oversees legal compliance of the company. Each site ensures their compliance with legally required licenses and permits. Monthly legal updates are provided through legal subscription services and analysis, as well as through membership with SONAMI.</p> <p>This was confirmed through site observation; management interviews and document review including internal audit results, government inspections, and legal audit results, among others.</p>
2. Business Integrity	Fully meets	<p>Mantos Blancos has in place a documented management system that effectively prevents bribery, corruption, and anti-competitive behavior. Staff are trained on these topics and there is annual public reporting on payments to governments.</p> <p>This was confirmed through site observation; management interviews; worker interviews; and document review including the anti-bribery policy, code of conduct, risk matrix, training records, and sustainability report.</p>
3. Stakeholder Engagement	Fully meets	<p>Mantos Blancos conducts and documents a stakeholder mapping on a regular basis. Mantos Blancos also has developed an engagement plan and established a grievance mechanism.</p> <p>This was confirmed through site observation; management interviews; worker interviews; stakeholder interviews; and document review including the “our corporate principles” policy, stakeholder map, grievance procedure, and records of grievances, among others.</p> <p>More information is available <a href="#">here</a>.</p>
4. Business Relationships	Fully meets	<p>Mantos Blancos has developed a process for identification of significant business partners and subsequently communicates and engages with this group to promote responsible business practices. Language on responsible business practices is included in a</p>

		<p>code of conduct that suppliers and contractors are required to sign and adhere to. Suppliers and contractors are evaluated based on such criteria; results of such evaluations are taken into consideration to approve them.</p> <p>This was verified through management interviews; and document review, including the code of conduct, supplier code of conduct, human rights and corporate affairs policy, due diligence procedure, requirements for contractors, signed supplier agreements, and supplier evaluations, among others.</p>
5. Child Labor	Fully meets	<p>Mantos Blancos has in place a management system that ensures against the employment of people under the age of 18 years old. No underage persons were observed onsite.</p> <p>Hiring procedures are in place to verify age of applicants; such requirements are communicated and trained to contractors, which are also verified for conformance.</p> <p>This was verified through worker interviews; management interviews; site observation; and document review, including the code of conduct, human rights policy, hiring checklist, communication, and training records, among others.</p>
6. Forced Labor	Fully meets	<p>Mantos Blancos has in place policies, procedures, and practices to prevent the use of forced labor or participation in acts of human trafficking.</p> <p>From the recruitment and hiring process and throughout employment, the site refrains from document retention practices, restricting worker movement and requesting mandatory overtime. Workers are free to end the labor relationship without restrictions, leave the workplace as needed and are paid severance within legal timeframe.</p>

		<p>This was verified through worker interviews; management interviews; site observation; and document review, including the code of conduct, severance payment records, and the Human Rights policy, among others.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>Mantos Blancos has in place policies, procedures, and practices to ensure they respect employees' rights to freedom of association and to collective bargaining.</p> <p>Workers may join or refrain from joining any of the two unions present at the site; they are informed about them during onboarding. Collective agreements are negotiated every three years, unions report the company bargains in good faith.</p> <p>This was confirmed by interviews with management; worker interviews; union representatives interviewed; and a review of documents including the collective bargaining agreements, the company's code of conduct, and training records, among others.</p>
8. Discrimination	Fully meets	<p>Mantos Blancos has in place policies, procedures and practices to identify and prevent discrimination and harassment against a wide range of protected classes including age, gender, race, national and ethnic origin, religion, language, and sexual orientation, among others.</p> <p>Mantos Blanco's annual report addresses policies and performance on anti-discrimination, inclusion, and promotion of equality. Both internal and external stakeholders confirm awareness on how to report instances of discrimination and harassment; and confirm no discrimination practices are in place.</p> <p>This was confirmed by interviews with management; workers interviewed; external stakeholder interviews and a review of documents including the policy on diversity and inclusion, human</p>

		rights, code of conduct, and the annual report, among others.
9. Gender Equality	Fully meets	<p>Mantos Blancos has developed policies and procedures to evaluate gender equality and monitor progress to address gender inequality in the workplace.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the diversity and inclusion policy, human rights policy, training records, and sustainability report of the year 2021, among others.</p>
10. Working Hours	Fully meets	<p>Mantos Blancos has in place policies, procedures, and practices to keep employees' regular and overtime working hours within legally required limits and not more than sixty hours in the week.</p> <p>The average hours of this regular work shift are 46 hours per week over a two-week period. Overtime hours are voluntary in nature and happen infrequently. Working hours, overtime and rest days are in compliance with labor law and clauses of the collective bargaining agreement.</p> <p>This was confirmed by interviews with management; interviews with workers; a review of documents including the code of conduct, shift approval from the local government, collective bargaining agreement, and attendance records, among others.</p>
11. Remuneration	Fully meets	<p>Mantos Blancos has in place policies, procedures, and practices to pay employees wages that exceed national minimum wage and are aligned with the average local industry wage.</p> <p>The company has established a merit-based pay system with job determined salary scales. Salary and benefits are included in the collective bargaining agreement, which renews every three years.</p>

		<p>Contractor wages are audited as part of monitoring compliance. Wage composition is understood by workers; wages are paid timely, and the company provides wage statements.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; and a review of documents including wage records, code of conduct, collective bargaining agreement, and industry wage study, among others.</p>
<p>12. Occupational Health and Safety</p>	<p>Fully meets</p>	<p>As of the follow up assessment of 14 November 2023, this criterion is fully meets.</p> <p>Mantos Blancos has developed an internal health and safety management system that is aligned with ISO 45001, the company is seeking to obtain a certificate on this system on 2024.</p> <p>This program includes health safety inspections, accident reporting and investigations, hazard assessment and management, emergency preparedness, participation of workers and contractors in workplace health and safety decisions, training of managers and workers, communication to workers of occupational hazards, and allowing workers to remove themselves from dangerous workplace situations.</p> <p>During the site visit, a safe working environment was observed. Workers were using personal protective equipment; adequate risk signage and control measures are posted in each work area. Workers are trained to know the mine's safety rules, policies, standards, and regulations. Workers indicate knowing the procedure for reporting an accident or incident.</p> <p>This was confirmed by interviews with management; interviews with workers and union representatives; community interviews; a site walkthrough; and a review of documents including code of</p>



		<p>conduct, EHSS policy, emergency plan, risk assessment, accident investigation record, among others.</p> <p>The follow up assessment on 14 November 2023 verified implementation of the corrective action plan related to the improvement of infrastructure, adequate storage of chemicals and emergency lighting.</p> <p>This was confirmed through interviews with management; interviews with the team responsible for implementation; a documentary review; and visit to the areas was carried out to verify that the implementation was effective.</p>
<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos has developed and implemented a grievance mechanism that can be accessed via phone, email or face-to-face; and is available for internal and external stakeholders. Grievances are documented; evidence is maintained of grievances reception, investigation, resolution, and communication of resolution. The grievance mechanism appears to be developed in alignment with the UN Guiding Principles Effectiveness Criteria for Non-Judicial Grievance Mechanism; however, the following gap was identified:</p> <ul style="list-style-type: none"> <li>• Partial awareness of the existence of the grievance mechanism, both from direct workers and contractors.</li> </ul> <p>This was confirmed by interviews with management; interviews with workers and union representatives; community interviews, and a review of documents including the integrity policy, grievance procedure, records of grievances, among others.</p> <p>During the follow up assessment in June 2024, the assessor verified that all stakeholders including direct workers and contractors received training to</p>

		<p>enhance awareness of the grievance mechanism in place at the site.</p> <p>This was confirmed through interviews with workers, interviews with management, a review of the training materials, and samples of acknowledgement of training.</p>
14. Environmental Risk Management	Fully meets	<p>Mantos Blancos has developed and implemented policies and procedures, supported by communications and training regarding environmental risk management. Continuous improvement on environmental risk factors is documented and tracked through objectives and performance evaluations.</p> <p>Mantos Blancos has identified significant negative and positive environmental impacts of its operations and has established mitigation measures for such impacts. Legal permits are tracked to ensure they are valid and renewed accordingly.</p> <p>This was confirmed by interviews with management; interviews with workers; a site walkthrough; and a review of documents including code of conduct, EHSS policy, environmental risk management procedures, training records, and the sustainability report, among others.</p>
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos has developed an environmental protection policy, quantified greenhouse gas emissions under scope 1 and 2, and has reported on this in its sustainability report for 2021-2022. Mantos Blancos has developed a strategy for the reduction of 30% GHG emissions between 2025-2030.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> <li>• There is not a written procedure to identify emissions, monitor</li> </ul>

		<p>emissions trends and establish short-term reduction targets.</p> <p>The company will increase GHG emissions by 2024 due to the start-up of the concentrator plant growing stage.</p> <p>This was confirmed by interviews with management; and a review of documents including GHG protocol, code of conduct, EHSS policy, and the annual total emission sustainability report, among others.</p> <p>More information is available <a href="#">here</a>.</p> <p>During the follow-up assessment in June 2024, it was confirmed that the company developed a written procedure, that allows the company to identify emissions, monitor emission trends, and develop measures to set short-term emission reduction goals.</p>
16. Energy Consumption	Fully meets	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos has included language of its intent to protect natural resources and its proper use, within its code of conduct and EHSS policy. Mantos Blancos is currently in the process of implementing a management system based on ISO 50001.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• The site has not obtained a certificate of the implementation of its energy management system, which is legally required. The site has engaged a consultant to seek to obtain the certificate by March 2024.</li> <li>• The site has not quantified efficiency or implemented programs to improve efficiency/reduce consumption and increase the use of renewable energies.</li> </ul> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of</p>

		<p>conduct, EHSS policy, and sustainability report 2021-2022, among others.</p> <p>During the follow-up assessment in June 2024, the assessor verified the company's energy management system controls and optimizes energy use to reduce consumption, costs, and environmental impact. The site has since obtained the certificate of implementation of its energy management system. Efficiencies are quantified, and programs are implemented to improve efficiency/reduce consumption.</p> <p>This was confirmed by interviews with management, a review of documents including the ISO 50001 certification report, baseline data, energy review worksheet and indicators.</p>
<p>17. Freshwater Management and Conservation</p>	<p>Fully meets</p>	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos operation is supplied of fresh water by two companies for different parts of the productive process. The water used in the process is recirculated; wastewater is treated and used to irrigate internal roads.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> <li>• The company has not conducted a comprehensive assessment of water use impacts and risks.</li> </ul> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including code of conduct, EHSS policy, environmental impact matrix, and water management system, among others.</p> <p>During the follow up assessment in June 2024, the assessor verified there is a comprehensive assessment of water use impacts and risks.</p> <p>This was confirmed through interviews with management, and a review of documents, including the risk matrix,</p>

		<p>which covers information about the external contractors supplying the water.</p>
<p>18. Waste Management</p>	<p>Fully meets</p>	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos has developed and implemented policies and procedures to reduce waste generation and to manage waste from generation to disposal. The site has obtained approval by the local authority on its waste management plan and permits for disposal of all types of waste. Moreover, Mantos Blancos has implemented recycling initiatives.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> <li>• On facilities, there were gaps identified regarding the provision of a clean and safe working environment. The gaps were related to: <ul style="list-style-type: none"> <li>○ Deteriorated infrastructure at the temporary waste storage area</li> <li>○ Waste products stored outdoors.</li> </ul> </li> </ul> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, waste management matrix, and waste management procedures, among others.</p> <p>During the follow up assessment in June 2024, the assessors verified that the hazardous waste yard infrastructure was improved, as was order and cleanliness necessary to comply with local law.</p> <p>This was confirmed through interviews with workers from the external provider at the waste yards, site observations, and review of documents including the daily, weekly, monthly verification of the state and amount of waste, waste</p>

		management plan, and approved sector permits.
19. Tailings Management	Partially meets	<p>As of the follow up assessment in June 2024, this criterion remains partially meets.</p> <p>Mantos Blancos has developed policies and procedures for the compliance of the Global Industry Standard on Tailings Management and has begun to implement a workplan towards alignment with this standard.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> <li>As the workplan is in process, it is not fully implemented yet to meet the GISTM. According to plan it will be finalized by 2025.</li> </ul> <p>This was confirmed by interviews with management; worker interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, tailings policy, and GISTM report progress, among others.</p> <p>During the follow up assessment the assessor verified that the (ITRB) and (EOR) have been defined. The TMS and GISTM implementation strategy seeks to reach 100% implementation by August 2025. As of the day of the follow-up audit, progress in the implementation of the GISTM was at 32%.</p> <p>An extension has been granted until the end of August 2025.</p>
20. Pollution	Fully meets	<p>Mantos Blancos has implemented a policy that follows the mitigation hierarchy to avoid, minimize, reduce, and compensate for the impact of pollution on human health and the environment.</p> <p>The site demonstrates to implement necessary measures to avoid and minimize the pollution generated by its operations.</p>

		<p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including code of conduct, EHSS policy, and environmental assessment, among others.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>Mantos Blancos has developed and implemented policies and procedures on biodiversity. The Mantos Blancos site is not located within a Critical Habitat or World Heritage site.</p> <p>Biodiversity in the area of influence of Mantos Blancos is not categorized as Endangered Species. The company has assessed its environmental impact, including impact on biodiversity; and has developed a management plan to protect and restore biodiversity. A reporting mechanism is available to all stakeholders to inform of incidents or animal sightings.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including the code of conduct, EHSS policy, the environmental impact assessment, and the flora and fauna monitoring reports, among others.</p>
22. Mine Closure and Reclamation	Fully meets	<p>Mantos Blancos has developed a mine closure plan with stakeholder participation; such plan contemplates objectives and goals on maintenance and supervision of the site and its remaining impacts.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site walkthrough; and a review of documents including code of conduct, EHSS policy, and resolution approving MB closure plan, among others.</p>
23. Community Health and Safety	Fully meets	<p>Mantos Blancos Mantos Blancos has evaluated the potential health risks of its operation on the cities of Baquedano and Antofagasta. Measures have been</p>

		<p>implemented on the site to mitigate potential health impacts to community.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including the sustainability report, the environmental, social and health risk assessment, and stakeholder mapping, among others.</p>
24. Community Development	Fully meets	<p>Mantos Blancos actively engages with the community representatives in periodic roundtables to identify projects the company can fund to support community development. The initiatives implemented at the community are centered on education and culture, entrepreneurship, and development of sustainable communities.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including stakeholder mapping of local communities, minutes of community meetings, and social management plan, among others.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>The assessor confirmed that there are no Artisanal and Small-Scale Mining operations in the area of influence of Mantos Blancos.</p>
26. Human Rights	Fully meets	<p>Mantos Blancos has implemented the UN Guiding Principles on Business and Human Rights and has in place policies and procedures to uphold their human rights commitment. Mantos Blancos publishes annually, their performance against this commitment.</p> <p>Mantos Blancos has conducted a human rights risk assessment; results are described on the human rights risk matrix which specifies the risk level of each potential impact. Case studies are available for review on actual risk mitigation actions, aimed at reducing the likelihood of adverse human rights impacts; such actions are confirmed by community interviews. Both internal and external stakeholders report awareness</p>



		<p>on the human rights policy, how to report violations and how these are remediated.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; and a review of documents including the code of conduct, corporate principles, human rights risk assessment, human rights risk matrix, case studies, and the sustainability report, among others.</p>
<p>27. Security and Human Rights</p>	<p>Fully meets</p>	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos as implemented a Human Rights Policy that covers security practices. This Human Rights Policy commit to identify risks related to human rights security practices, acting in alignment with the Voluntary Principles on Security and Human Rights.</p> <p>Training has been provided to contracted security guards by an independent institute based in Chile.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> <li>• No risk assessment has been conducted as outlined in the Voluntary Principles on Security and Human Rights (VPSHR).</li> <li>• Workers and security personnel are not aware of the VPSHR.</li> <li>• Training materials for security guards do not cover the VPSHR.</li> </ul> <p>This was confirmed by interviews with management; worker interviews; and a review of documents including code of conduct, human rights risk assessment, and the grievance procedure, among others.</p> <p>During the follow up assessment the assessor verified that the company has established a clear policy of commitment to human rights and safety, including the adoption of</p>

		<p>international standards such as the Voluntary Principles on Security and Human Rights. The sites has identified and assessed potential risks to human rights within the operations, and implemented a training program to help build awareness and skills.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the record of review of delivery of the policy and training materials, and the human rights risk assessment.</p>
28. Indigenous Peoples' Rights	Not applicable	<p>There are no declared indigenous communities in the area of influence of the company.</p> <p>Given the context in which Mantos Blancos operates, the assessors concluded that implementing site-specific policies and procedures on Indigenous People's Rights is not applicable.</p>
29. Land Acquisition and Resettlement	Not applicable	<p>Given the context in which the Mantos Blancos company operates, the assessors concluded that implementing site-specific policies and procedures on land acquisition and resettlement is not applicable.</p> <p>The site operation is in a sparsely populated desert-like environment, there has been no affected people by the operation of the company.</p>
30. Cultural Heritage	Fully meets	<p>Mantos Blancos has fully implemented a process to manage risks to culture and heritage associated with their activities that is based on consultation with stakeholders.</p> <p>This was confirmed by interviews with management; worker interviews; community interviews; site observation; and a review of documents including code of conduct, environmental assessment, and archaeological mapping, among others.</p>

<p>31. Due Diligence in Mineral Supply Chains</p>	<p>Fully meets</p>	<p>As of the follow up assessment in June 2024, this criterion is fully meets.</p> <p>Mantos Blancos has developed a policy and due diligence process to comply with the US FCPA, the UK Modern slavery act and the Chilean Ley 20393, rather than the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> <li>• The policy and procedures on due diligence do not include the five-step due diligence process defined in OECD Guidance Annex I; and no mention of the Annex II Risks.</li> </ul> <p>This was confirmed by interviews with management; and a review of documents including the code of conduct, requirements for contracted companies, supplier assessments, and due diligence procedure among others.</p> <p>During the follow up assessment in June 2024, the assessors verified that the policy now aligns with the OECD Annex II, document retention policy was updated to meet the 5-year requirement, the process adheres to that of the OECD Minerals Guidance, and the Step 5 report has now been published.</p> <p>This was confirmed through interviews with management and a review of documents including a new Due Diligence Policy, Policy for Contracting Goods and Services, Procedure for Administration of Suppliers, and Procedures for Due Diligence of Counterparties that provide the required alignment to the due diligence process of the OECD, reference to the Annex II Risks, and a document retention policy extended to 5 years. In addition, a report aligned with Step 5 reporting requirements of the OECD framework was prepared and published.</p>
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	31.a. Management System	Fully meets	<p>As of the follow up assessment in June 2024, this criterion is fully meets. See the explanation and reviewed evidences above.</p> <p>The due diligence process currently in place was established to comply with the US FCPA, the UK Modern Slavery Act, and the Chilean Ley 20393, rather than the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. As such, and because it has not yet incorporated the OECD Due Diligence Guidance, the policy and procedures on due diligence do not include the five-step due diligence process defined in OECD Guidance Annex I; and no mention of the Annex II Risks.</p> <p>The site does not accept any external minerals or materials, it does have due diligence processes in place related to contracting service providers and it manages this system and applies it, as noted in Criteria 4.</p>
	31.b. Red Flag Identification Process	Fully meets	<p>During the follow up assessment, the assessors verified the existence of a red flag risk assessment including a procedure to identify CAHRAs.</p> <p>No red flags were identified.</p>
	31.c. Risk Assessment Process	Not applicable	No red flags were identified.
	31.d. Risk Management Process	Not applicable	No red flags were identified.
	31.e. Public Reporting	Fully meets	<p>As of the follow up assessment in June 2024, this element is fully meets.</p> <p>While Mantos Blancos reports publicly on ESG, there is no Step 5 report aligned with the OECD framework.</p> <p>As of the follow up assessment in June 2024, this has been published <a href="#">here</a>.</p>
	32. Transparency and Disclosure	Fully meets	The parent company Capstone Copper engages in regular public reporting, including through an annual sustainability report using GRI

		<p>requirements, which includes site-level data of Mantos Blancos. The company also provides additional information on ESG targets on their website.</p> <p>Capstone Copper Sustainability report can be found <a href="#">here</a>.</p>
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## Conclusions

Statement of conformance	
<p>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.</p>	<p><input checked="" type="checkbox"/> The site has been granted an extension to complete criterion 19.</p>
<p>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 8 August 2024.</p>	<p><input type="checkbox"/></p>
<p>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 8 August 2024.</p>	<p><input type="checkbox"/></p>
<p>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.</p>	<p><input type="checkbox"/></p>
<p>Limitations:</p>	
<p>Additional comments:</p>	

## Award

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

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	14 September 2023
Expiry Date of The Copper Mark	13 September 2026