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Assessment Summary Report

Participant Information

Name of the Site	Complejo Industrial Molynor S.A.
Unique identifier provided by the Copper Mark	P0064
Address	Avenida Prolongación Longitudinal 6400. Port Complex, Mejillones
Country of Operation	Chile
Principle covered products produced on site. (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Technical molybdenum oxide
Metals produced on site. (e.g., copper, gold, nickel, silver, molybdenum)	Molybdenum
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Molybdenum
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 type="checkbox"/>
Concentrate blending	<input type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Fabrication	<input type="checkbox"/>
Other (<i>please explain</i>)	Roasting
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
<p>ISO 45001:2018</p> <p>Certification valid until: 25 October 2023</p> <p>Plans to renew are in place.</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> Valid at the time of the review No more than 24 months old and / or plans for reassessment are underway. In effect for an additional 12 months and / or plans for reassessment are underway Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials Accompanied by improvement plans where applicable 	<p>12. Occupational Health and Safety</p>
<p>ISO 14001:2015</p> <p>Certification valid until: 25 October 2023</p> <p>Plans to renew are in place.</p>	<p>The assurance / certification was confirmed to be:</p> <ul style="list-style-type: none"> Valid at the time of the review No more than 24 months old and / or plans for reassessment are underway. In effect for an additional 12 months and / or plans for reassessment are underway Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials 	<p>14. Environmental Risk Management</p> <p>16. Energy Consumption</p> <p>18. Waste Management</p> <p>20. Pollution</p> <p>21. Biodiversity and Protected Areas</p>

	<ul style="list-style-type: none"> Accompanied by improvement plans where applicable 	
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Independent Site Assessment Information

Name of the Lead Assessor	Pamela Mendez
Name of the Assessment Firm (if applicable)	Initial Onsite: Ernst & Young (EY) Follow-up assessment: TDi
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	08 August 2023 – 03 November 2023 Initial Onsite: 16-18 August 2023 1 st Follow up assessment: January 2024 <u>2nd Follow up assessment: 19-21 November 2024</u>
Assessment Period	03 November 2022 – 03 November 2023
Summary of the Assessment Methodology	<p>The methodology used for the assessment consisted of a site visit to the Molynor facility, interviews with employees, management and stakeholders, site walkthrough and documentation review. Pre-assessment activities included a review of the Copper Mark self-assessment report.</p> <p>A specific reasonable assurance methodology is applied for evaluations of The Copper Mark, in accordance with International Standard on Assurance Engagements (ISAE) 3000, other than audits or reviews of historical financial information. A reasonable assurance commitment includes assessing the adequacy of the quantification methods, reporting policies and internal guidelines used and the reasonableness of the estimates made by Molynor.</p> <p>In addition to evaluating the appropriateness in the circumstances of Molynor's use of the applicable reporting criteria as the basis for preparing the selected information.</p> <p>Molynor is a subsidiary of Molymet and as such adheres to many corporate policies and procedures of Molymet Corporate.</p> <p>Permanent workers: 183 Contract workers: 85 (average)</p>
Summary of the Assessment Activities	<p>The assessment consisted of the following:</p> <ul style="list-style-type: none"> Document review Site visit of 3 days Management interviews Survey to collaborators Community stakeholder interviews

	<ul style="list-style-type: none"> • Supplier interviews • Information analysis
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Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Molynor ensure the company’s legal compliance by utilizing a matrix that systematizes and summarizes the laws, their updates and applicability to Molynor.</p> <p>The legal requirements matrix was created in collaboration with a third-party entity and is updated every three months. Both daily and monthly newsletters are issued to ensure that Molynor is up to date with all applicable regulations and standards.</p> <p>Additionally, the company is currently undergoing a governance transition, decentralizing legal commitments to individual areas within the organization.</p> <p>This shift aims to enhance accountability and efficiency in managing commitments, facilitating better compliance with legal obligations and overall improvement in performance.</p> <p>Worker interviews confirm that they have received relevant and constant training on the matter.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the Legal Matrix, annual audit program, lawsuit documents, and monthly reports.</p>
2. Business Integrity	Fully meets	<p>Molynor has a Code of Conduct that prohibits bribery, corruption, and anti-competitive conduct. This Code is complemented by internal policies, which makes explicit the duty of employees to avoid bribes and to report any situation that may violate</p>

		<p>Law No. 20,393. This law refers to the prevention of crime and establishes the criminal liability of legal persons in the crimes of money laundering, financing of terrorism and bribery of national or foreign public officials.</p> <p>Additionally, Molynor has a Policy of Organizational Values and Principles of Corporate Action that establishes ethical values for personnel with respect to anti-competitive conduct, such as, for example, receiving payments or benefits for a commercial deal or receiving gifts.</p> <p>Furthermore, Molynor mandates that all employees and contractors sign an affidavit as per Law No. 20.393. In the case of employees, there is no set update period for this statement, while permanent contractors must renew it every three years.</p> <p>This was confirmed by interviews with management; interviews with workers and contractors; and a review of documents including the Code of Conduct, relevant policies and law, and affidavit form of Law 20.393 from contractors and suppliers.</p>
3. Stakeholder Engagement	Fully meets	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>Molynor has in place policies, procedures and plans that aims to 'strengthen and strategically enhance' their management in the territory.</p> <p>The Molynor Action Plan identifies key stakeholders that have a relationship with Molynor and characterizes the communities within the area of influence in its economic, social, and environmental dimension. These this evaluation is updated every three years and will involve the community in the process, promoting two-way communication that contributes to its improvement.</p> <p>Molynor has set up an external communication process connected to</p>

		<p>meetings and guidelines for handling claims, complaints, and suggestions.</p> <p>This procedure outlines how concerns or complaints are managed, specifying key individuals responsible. The channel is accessible to all stakeholders, and feedback is received anonymously.</p> <p>Although there are instances to interact with different groups and associations, community interviews reveal a lack of awareness regarding the "Molynor Action Plan" specifically. Instead, community members are familiar with specific activities benefiting them. Stakeholders interviewed are unaware of implemented complaint channels at operational and corporate levels.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Community stakeholders have no knowledge of the company's relationship plan or reporting channels. <p>This was confirmed by interviews with management; interviews with workers; interviews external stakeholders; and a review of documents including community relation plans, corporate sustainability strategy, Map Actors Molynor, relevant policies and grievance files. Ethics Line Website</p> <p>During the follow-up assessment, the assessors verified that Molynor has established comprehensive stakeholder engagement practices, including the "Acciona Molynor" plan, regular communication with communities and authorities, and bi-monthly "Molynor Open Doors" events. While grievance mechanisms and communication channels are in place and accessible, some community members remain unaware of the company's relationship plan and reporting channels. Despite this, no grievances or complaints have been reported, and Molynor's initiatives</p>
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		<p>have generally received positive feedback.</p> <p>The assessors verified through document review and interviews to confirm that the previously identified gap regarding community stakeholders' lack of knowledge about the company's relationship plan and reporting channels has been addressed.</p>
<p>4. Business Relationships</p>	<p>Fully meets</p>	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>Molynor applies the Corporate Supplier Policy of Molymet that declares eleven principles for sustainable development in the supply chain of inputs and services. Additional policies establish rules and guidelines for business relationships with suppliers and contractors. These corporate policies, along with Molynor's Code of Conduct, are shared with suppliers.</p> <p>In addition, Molynor have an accreditation process in which compliance with labor obligations, tax debts and the financial health of collaborating companies is verified.</p> <p>Furthermore, the possible risks that may arise in these relationships with permanent suppliers are reviewed based on quarterly audits.</p> <p>Although Molynor conducts audits of its most relevant suppliers, it does not consider activities focused on the promotion of responsible business practices beyond the legal, so this relationship does not address issues such as community relations, human rights, environmental management.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Molynor do not consider the promotion of responsible practises beyond legal requirements. The site does not address issues such as human rights, environmental management, and community relations, in its supplier criteria.

		<p>This was confirmed by interviews with management; interviews with workers; interviews suppliers and contractors; and a review of documents including Molynor Code of Conduct, relevant policies and supplier contracts.</p> <p>During the follow-up assessment, the assessors verified that Molynor has developed and begun implementing a Sustainable Supplier Development Plan to promote responsible practices in its supply chain. The plan incorporates sustainability criteria into procurement processes, including human rights, environmental management, diversity, and inclusion. Formal communication with suppliers has reinforced these commitments, and training sessions have been conducted for procurement staff.</p> <p>The assessors verified through document review and interviews that the previously identified gap regarding the promotion of responsible practices beyond legal requirements in supplier criteria, including human rights, environmental management, and community relations, has been addressed</p>
<p>5. Child Labor</p>	<p>Fully meets</p>	<p>Molynor is governed by the Labour Code and implements controls, declarations, and training of its Code of Conduct to prevent and reject child labour.</p> <p>Employees are required to verify their age during the recruitment process, and entrances to facilities are under biometric control to restrict unwarranted access.</p> <p>As for contractors, Molynor has established manuals that explicitly state the prohibition of hiring employees under the age of 18. Additionally, the contractor accreditation process includes a background check as an initial criterion in the selection of</p>

		<p>collaborators and the awarding of services.</p> <p>No underage persons were observed on site.</p> <p>This was confirmed by interviews with management; interviews with workers; site observation; and a review of documents including relevant policies, personnel files and the accreditation platform manual.</p>
6. Forced Labor	Fully meets	<p>Molynor is governed by the Labour Code and implements controls, declarations, and training of its Code of Conduct to prevent and reject forced labour. These are reinforced with relevant policies and procedures, such as the Corporate Human Rights Policy.</p> <p>Based on survey results and interviews with workers, it was verified that none of them have experienced or are aware of cases of forced labour. Workers also confirmed that they were free to quit their jobs if they wished.</p> <p>No indication of forced labour or coercion between employees, management, and the company was observed onsite.</p> <p>This was confirmed by interviews with management; interviews with workers; site observation; and a review of documents including relevant policies and Molynor Code of Conduct.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>Molymet has a parent company Corporate and Management Policy for Employee Relations at the executive level, hence, inaccessible to all employees. Currently, Molynor engages in a collective bargaining process with the company's two unions every 30 to 36 months, employing a systematic approach to negotiate, develop indicators, draft collective agreements, and address union-raised concerns.</p>

		<p>There are procedures in place at the Molymet corporate level and efforts are ongoing to align corporate-level procedures with the operations level. Surveys reveal not all employees feel free to join a trade union, and there are no documented measures to protect this freedom of association.</p> <p>Molynor engaged in parallel collective bargaining with labor union N° 2, however, the negotiation was disrupted, leading to a legal strike announced on September 13. The Regulated Collective Bargaining process concluded on October 13, 2023, with the acceptance of a new offer by Molynor, voted on by union members at the Labor Inspectorate offices.</p> <p>Worker interviews stated that they had not suffered or observed any type of discrimination for being a part of a trade union, however, a large number of workers report that they have not received training associated with freedom of association. Less than 20 per cent of workers reported that they do not feel free to join a union.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • There is no freedom of association policy that is available to all workers. • Not all employees feel free to join a union. • No measures are in place to prevent discrimination against those associated with a trade union. • No training is provided on the freedom of association. <p>This was confirmed by interviews with management; interviews with workers and union representatives; site observations; and a review of documents including the collective bargaining agreement and Molynor Code of Conduct.</p> <p>During the follow-up assessment, the</p>
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		<p>assessors verified that Molynor's Code of Conduct, Employee Relations Policy, and Human Rights Policy, which collectively address freedom of association, non-discrimination, and collective bargaining rights. They confirmed that structured communication mechanisms, such as bi-weekly meetings with union leaders and bi-monthly meetings with senior management, are in place to foster collaboration with unions. Union leader contact details are now displayed on company notice boards, and relevant policies are accessible through the Internal Management System and internal communications. Employees reported no formal complaints or evidence of discrimination related to union membership, and union leaders corroborated that employees can freely join unions without pressure. The assessors verified through document review and interviews with workers that the previously identified gap regarding freedom of association and collective bargaining has been addressed.</p>
8. Discrimination	Fully meets	<p>Molynor has policies and procedures in place to establish commitments regarding inclusive recruitment and selection processes.</p> <p>This is strengthened by the Code of Conduct, that establishes a series of principles on non-discrimination issues.</p> <p>Relevant training on the matter is provided for both employees and management.</p> <p>Furthermore, Molymet has established an anonymous whistleblowing system at the corporate level, through its Ethics Hotline, and at the operational level for Molynor, there is a mailbox for queries, complaints, concerns, or suggestions.</p> <p>Interviews with both internal and external stakeholders affirm that they have neither personally encountered nor witnessed any instances of discrimination.</p>

		<p>This was confirmed by interviews with management; interviews with workers and union representatives; site observations; and a review of documents including relevant policies Supplier Code of Conduct, recruitment and selection documents, and Molynor Code of Conduct.</p>
<p>9. Gender Equality</p>	<p>Fully meets</p>	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>Molynor is committed to the 2030 Agenda which aims to increase women's representation in leadership position by 30% from 2020 levels.</p> <p>Gender non-discrimination is considered in the company's procedures and supported by a new Diversity and Inclusion Policy. Additionally, the Code of Conduct explicitly rejects gender and gender identity discrimination, reinforced in related trainings.</p> <p>However, there is no mention of action plans or efforts aimed at addressing the pay gap presented in the 2022 Corporate Sustainability Report. Nor is there any training for workers on this subject.</p> <p>While a substantial number of workers affirm equal treatment irrespective of gender, some workers cite the wage gap as a factor of gender inequality.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • No action plans or efforts are made to address the pay gap presented in the 2022 Corporate Sustainability Report. • No relevant training is provided for workers. <p>This was confirmed by interviews with management; interviews with workers; site observations; and a review of documents including Molynor Sustainability Agenda 2030, Corporate Sustainability Strategy and relevant policies.</p>

		<p>During the follow-up assessment, the assessors verified that Molynor has a process in place to meet internal equity and market competitiveness. The process is aligned to an internal employee relations plan, which took effect in the December payroll.</p> <p>Molynor also set a target to increase the proportion of female staff to 30% by 2030, complemented by a plan aimed at enhancing inclusion, participation, and training of women in operational roles.</p> <p>Training on gender equality has begun and will continue to be rolled out over the next year.</p> <p>This was confirmed through interviews with management, interviews with workers, and a review of documents including the employee relations plan, internal compensation review calendar, training presentation on gender issues, attendance records for gender issues workshop, and plan and schedule for 2024-2025 gender-related workshops.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>Molynor complies with the working hours established by current legislation, which are defined in the Internal Regulations and employment contracts. Working hours are tracked and logged in a system that generates alerts if overtime is detected without the corresponding authorization. This ensures that any additional working time is in line with established procedures.</p> <p>For contractors, a double control system is in place, utilizing attendance books and biometric registration. The accreditation process includes obtaining resolutions supporting exceptional working days and signed overtime agreements, ensuring transparent compliance with working hours and labor regulations for both plant employees and contractors.</p> <p>Worker interviews confirm that the limit of hours to be worked according to their</p>

		<p>role is respected and that overtime is voluntary.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including the relevant policies and Molynor overtime authorization form.</p>
11. Remuneration	Fully meets	<p>Molynor enforces policies ensuring wages meet or exceed legal standards. Additionally, Molynor utilizes an automated compensation management system that is also monitored by the HR team.</p> <p>Parameterized processes for benefits mesh payments and collective bargaining benefits are executed via the 'SuccessFactors' platform.</p> <p>Employees access settlement information through the platform, promoting transparency and accessibility to data related to their compensation. Despite automation, monthly reviews ensure accurate remuneration calculations and payments.</p> <p>Worker interviews confirm timely and contract-compliant salary payments, noting accessibility and clarity in payment details without intermediaries.</p> <p>This was confirmed by interviews with management; interviews with workers; and a review of documents including relevant policies and remuneration procedure.</p>
12. Occupational Health and Safety	Fully meets	<p>The assessment confirmed equivalence through ISO 45001:2018.</p>
13. Grievance Mechanism	Fully meets	<p>Molynor has both corporate and operational grievance mechanisms, each with defined procedures, responsible parties, and resolution deadlines.</p> <p>Complaint mechanisms are accessible to both internal and external stakeholders. All complaints are made anonymously. Additionally, internal communication campaigns are carried out to disseminate the channel, the</p>

		<p>investigation procedures, and the types of complaints.</p> <p>Worker interviews confirm knowledge of confidential and anonymous complaint options, expressing confidence in non-retaliation for using these channels.</p> <p>Opportunity for improvement:</p> <ul style="list-style-type: none"> It is recommended to continue strengthening communication campaigns to promote awareness of Molynor's whistleblowing channel. <p>This was confirmed through site observations; interviews with management; interviews with workers and union representatives; and a review of documents including Molynor Code of Conduct and relevant policies.</p>
<p>14. Environmental Risk Management</p>	<p>Fully meets</p>	<p>The assessment confirmed equivalence through ISO 14001:2015.</p>
<p>15. Greenhouse Gas (GHG) Emissions</p>	<p>Fully meets</p>	<p>Molynor has policies and practices in place to measure and reduce greenhouse gas (GHG) emissions. In line with its Corporate Sustainability Strategy, Molynor aims to reduce its emissions (scope 1 and 2) by 20% by 2030, based on 2020.</p> <p>Furthermore, Molynor has obtained the "Huella Chile" quantification seal and makes data on GHG emissions available to its stakeholders through its Corporate Sustainability Report.</p> <p>As of 2022, Molynor have begun measuring their scope 3 emissions to begin its management.</p> <p>There is an opportunity for improvement. The quantification of the carbon footprint is out of date by one year. Therefore, it is recommended to update this information on a recurring basis to have concordance and updated follow-ups to meet the proposed goals.</p> <p>Worker interviews confirmed awareness of initiatives to reduce greenhouse gas emissions.</p>

		<p>This was confirmed through site observations; interviews with management, interviews with workers; interviews with external stakeholders; and a review of documents including relevant policies and Molymet's (Parent Company) Sustainability Report.</p> <p>Link to Molymet's Sustainability Report</p>
16. Energy Consumption	Fully meets	<p>The assessment confirmed equivalence through ISO 14001:2015. This criterion is included in the scope of the ISO certification.</p>
17. Freshwater Management and Conservation	Fully meets	<p>The parent company, Molymet, has a Corporate Sustainability Strategy that declares the commitment to integrate water efficiency within the framework of a Climate Change Policy, as well as the duty to aim at the reduction, reuse, recycling and/or discharge of the resource. In addition, the company has developed a water risk matrix, updated to 2023, to assess potential impacts related to water consumption. The policy applies to Molynor, as a subsidiary.</p> <p>Molynor operates exclusively with seawater and has a reverse osmosis plant that produces water for the entire operation, including drinking water. However, the plant's brine discharge is impacting compliance with Supreme Decree 90 on liquid industrial waste discharge into marine bodies. A monthly monitoring program is in place for this discharge, and the results are regularly reported to relevant authorities.</p> <p>This was confirmed through site observations; interviews with management, interviews with workers; interviews with external stakeholders; and a review of documents including relevant policies, monitoring data, environmental matrix and annual sustainability reports.</p>
18. Waste Management	Fully meets	<p>The assessment confirmed equivalence through ISO 14001:2015. This criterion</p>

		is included in the scope of the ISO certification.
19. Tailings Management	Not applicable	This criterion is not applicable to non-mining operations.
20. Pollution	Fully meets	The assessment confirmed equivalence through ISO 14001:2015. This criterion is included in the scope of the ISO certification.
21. Biodiversity and Protected Areas	Fully meets	The assessment confirmed equivalence through ISO 14001:2015. This criterion is included in the scope of the ISO certification.
22. Mine Closure and Reclamation	Not applicable	This criterion is not applicable to non-mining operations.
23. Community Health and Safety	Fully meets	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>Molynor focuses its efforts on the health and safety of communities by collaborating with the Association of Mejillones Industrialists (AIM) on a project assessing industrial impacts on the bay, including seabed environmental evaluations.</p> <p>Further community initiatives include mammogram campaigns and hazardous substance training for local fire departments.</p> <p>Additionally, Molynor is considering enhancing its collaboration with the 'Aula Hospitalaria' to offer medical and dental services tailored to the community's needs, supplementing the services provided by the community hospital in Mejillones.</p> <p>Molynor complies with regulations through an implemented emergency plan and crisis management manual, alongside the development of an environmental impact studies and a matrix of socio-environmental risks.</p> <p>While the company has taken steps to enhance community health and safety, it lacks a systematic process for identifying social impacts and risks specific to the territory.</p>

		<p>Such a process would enable the development of targeted actions and mitigations in collaboration with stakeholders. Notably, the community faces substantial industrial intervention and contamination from thermoelectric power plants, oil, and port activity.</p> <p>Interviews with external stakeholders show that due to the high industrial activity in the area, marine pollution and emissions cannot be directly attributed to Molynor’s activities.</p> <p>They also confirmed the significance of the Hospital classroom, fostered through collaboration with Molynor, in allowing teachers and students to engage with neurodivergent children.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Molynor lacks a systematic process to identify and address social impacts and risks related to the health and safety of the community. <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including relevant policies, Legal Compliance Matrix and the Crisis Management Manual.</p> <p>During the follow-up assessment, the assessors verified that Molynor has developed and implemented comprehensive risk matrices that cover not just internal OHS and environmental risks but external-facing risks as well. As part of these efforts, Molynor participates in working groups addressing concerns related to chemical emergencies and traffic flows. It has also launched the “Molynor Open Doors” initiative, providing updates to the public on risk management and sustainability impacts. As a result of the changes, no significant impacts on community health and safety have been</p>
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		<p>recorded, which is corroborated by community members.</p> <p>This was confirmed by interviews with management, interviews with members of the community, and a review of documents including the safety risk matrices, environmental risk matrix and impact valuation, internal guidelines to identify aspects and assess environmental impacts, example email communications, and the Molynor Open Doors activity attendance records.</p>
<p>24. Community Development</p>	<p>Fully meets</p>	<p>Molynor has a community needs assessment that considers a multidimensional report of the environment, a mapping of key actors and a survey of socio-environmental risks.</p> <p>These reports characterize and detail the company's stakeholders, in addition to characterizing the commune of Mejillones in its economic, social, environmental, institutional and conjuncture dimensions. As an internal goal, the needs assessment of the communities near Molynor will be updated every three years.</p> <p>Based on gathered information, Molynor implemented the 'Plan Acciona Molynor,' a comprehensive community relations strategy focusing on strengthening communication channels with local stakeholders.</p> <p>The plan adopts a social investment approach with various lines of work, including linkage with the environment, local development, culture and sport, diversity, equity, and inclusion, as well as community support.</p> <p>While the plan has been fully implemented, no impact evaluations have been conducted on the initiatives. A corporate-level survey is ongoing to create impact measurement indicators associated with the plan's lines of work. The corporate plan will be subsequently adapted to each subsidiary of the company.</p>

		<p>Management interviews confirm that Molynor commits to the 2030 Agenda by pledging to invest at least 1% of the moving average net profit of the last 5 years in community development projects by 2030.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including relevant policies, and the terms and conditions for the competitive funds 2022 & 2023.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>The assessment confirms no artisanal or small-scale mining facilities are identified within the area of direct influence of Molynor, nor in the sourcing profile.</p>
26. Human Rights	Fully meets	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>The parent company, Molymet, has a Corporate Human Rights Policy, derived from the Code of Conduct, aligns with international human rights treaties and adopts the United Nations Guiding Principles in corporate management.</p> <p>Training on the Code and prevention campaigns, including a whistleblowing tool, are in place. Management interviews confirm that news programs have human rights as one of their axes, and hence this medium provides a mechanism to prevent the violation of these rights.</p> <p>However, interviews with community members expressed they had no knowledge regarding Molynor's actions on human rights issues.</p> <p>While a due diligence process hasn't been conducted to identify human rights risks, the corporate sustainability area is working to initiate proposals for evaluation across various channels, including human rights, scheduled for the next year.</p>

		<p>The following gaps were identified:</p> <ul style="list-style-type: none"> • A due diligence process is currently not in place to identify risks and impacts on human rights. • Community members are unaware of Molynor’s actions on human rights issues. <p>This was confirmed through interviews with management; interviews with workers; interviews with external stakeholders; and a review of documents including relevant policies, and the Code of Conduct Course Report.</p> <p>During the follow-up assessment, the assessors verified that Molynor has that the previously identified gap regarding the lack of a due diligence process to identify human rights risks and community members’ limited awareness of Molynor’s human rights actions has been addressed. Molynor has implemented a Human Rights Policy, disseminated through internal channels and reinforced via communication campaigns. The company engages the community through initiatives like the "Molynor Open Doors" event and the "Quiénes Somos" video, which highlight its human rights commitments. Additionally, a due diligence process aligned with OECD guidelines is in place to manage human rights risks in the mineral supply chain.</p> <p>This was confirmed through a review of documents, including Molynor's Code of Conduct and Molymet's Corporate Human Rights Policy, as well as interviews conducted with management, employees, union leaders, and community members.</p>
27. Security and Human Rights	Not applicable	This criterion is not applicable to non-mining operations.

28. Indigenous Peoples' Rights	Not applicable	The assessment confirmed that there are no indigenous peoples in the area of influence.
29. Land Acquisition and Resettlement	Not applicable	The assessment confirmed that there are no current or plans for land acquisition and resettlement.
30. Cultural Heritage	Not applicable	The assessment confirmed that there is no evidence of the existence of cultural, historical, or archaeological heritage.
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>During the follow up assessment in January 2024, this criterion was assessed as partially meets.</p> <p>Molynor, in collaboration with the corporate sustainability area, has a due diligence management system for the mineral supply chain.</p> <p>The system includes a manual and policy for responsible mineral sourcing, process to identify warning signs and risks.</p> <p>The system adheres to the OECD due diligence guidelines and incorporates minimum elements required by the joint due diligence standard, maintaining coherence with Molymet's corporate policies like Sustainability, Supplier Relations, and Human Rights.</p> <p>Molynor has a schedule of the main activities in order to fully implement this system by the year 2024.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • A due diligence management system is not yet implemented.
	31.a. Management System	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>The management system aims to ensure the responsible acquisition and use of minerals for all subsidiaries of the Molymet group, recognizing that there is the possibility of generating significant negative impacts due to the</p>

			<p>commercialization, management, and extraction of minerals.</p> <p>There are two transversal documents that correspond to the Mineral Supply Chain Due Diligence Management System Manual and the Policy that talks about how Molymet has a responsibility to act on responsible sourcing, linking it to the code of conduct and its organizational purpose, following the same principles of the supply chain due diligence management system and the joint due diligence of the standard. where process and continuous improvement, good faith, proportionality, inclusiveness, transparency, among others, are added.</p> <p>As identified above, the system has not been fully implemented.</p> <p>During the follow-up assessment, the assessors verified that the previously identified gap regarding the lack of a fully implemented Due Diligence Management System for the mineral supply chain has been addressed. Molynor has implemented a system aligned with the five steps of the OECD Guidelines, including a Due Diligence Policy, red flag identification and risk assessment procedures, and a risk management strategy. Documentation and interviews confirmed the establishment of processes for supplier evaluation, training, and reporting, with methodologies applied and results recorded. The assessment concluded that the system is operational, resulting in a rating of "Fully Meets."</p>
	<p>31.b. Red Flag Identification Process</p>	<p>Fully meets</p>	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>Molynor has a procedure for identifying warning signs and assessing risks, through a simplified process flow diagram, which culminates in the determination of the CAHRAs.</p>

			<p>The following gap was Identified:</p> <ul style="list-style-type: none"> The system has not yet been implemented. <p>During the follow-up assessment, the assessors verified that the red flag identification process within the Due Diligence Management System has been implemented. The process includes annual identification of CAHRAs using recognised public sources and evaluations of molybdenum concentrate suppliers through KYC questionnaires and sanctions list reviews. For the July 2023 to June 2024 period, all suppliers were evaluated, with no operations identified in CAHRAs. The assessors confirmed thorough documentation and the effectiveness of the process.</p>
	31.c. Risk Assessment Process	Not applicable	No red flags were identified resulting in the need for a risk assessment process.
	31.d. Risk Management Process	Not applicable	No red flags were identified resulting in the need for a risk management process.
	31.e. Public Reporting	Fully meets	<p>As of the follow up assessment in November 2024, this criterion is fully meets.</p> <p>While there is general information about suppliers in the annual report, specific OECD-based information is not yet included.</p> <p>During the follow-up assessment, the assessors verified that Molynor has implemented a procedure for public reporting on due diligence in the molybdenum concentrate supply chain. The first public report, covering the period from July 2023 to June 2024, was published in October 2024 and is available on the company's website. The report includes a direct link to the Due Diligence Policy, a description of the Due Diligence Management System aligned with the OECD Guidelines, the methodology applied, and the results of the red flag identification process. It also outlines risk management</p>

			<p>strategies, although no applicable risks were identified during the reporting period.</p> <p>The report is available here.</p>
32. Transparency and Disclosure	Fully meets		<p>Since 2018, Molynor has annually published a Molymet Corporate Sustainability Report, following GRI standards and encompassing ESG performance of its subsidiaries.</p> <p>Available in English and Spanish on Molymet and Molynor websites, the report complies with local regulations on integrated reporting. According to national law, companies issuing financial securities must address sustainability issues comprehensively in their Annual Report, which also imposes stricter corporate governance requirements, including the board of director" composition, role, and practices, as well as the management and supervision of sustainability-related risks.</p> <p>Read Molymet's Sustainability Report.</p>

Conclusions

Statement of conformance	
The site is found to fully meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard.	<input checked="" type="checkbox"/>
The site is found to fully meet or partially meet all applicable criteria of the Risk Readiness Assessment and, for Criterion 31, all applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 5 December 2024.	<input type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment and / or for Criterion 31, some, or all of the applicable conformance criteria of the Joint Due Diligence Standard. The site has committed to continuous	<input type="checkbox"/>

improvement to fully meet all applicable Copper Mark Criteria by 5 December 2024.	
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 type="checkbox"/>
The Molybdenum Mark	<input checked="" 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 Molybdenum Mark is awarded	19 th February 2024
Expiry Date of The Molybdenum Mark	18 th February 2027