



Assessment Summary Report

Participant Information

Name of the Site	Nexans Montreal-Est
Unique identifier provided by the Copper Mark	P0051
Address	460 Avenue Durocher Montréal-Est QC H1B 5H6
Country of Operation	Canada
Principle covered products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper rod
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper
Metals included in scope of Criterion 31 (this must be all, or a sub-set of the metals produced on site)	Copper
Metals covered by other independent assessments for Criterion 31 (e.g., RMAP, LBMA, RJC, etc.)	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 (<i>please explain</i>)	
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
NA	NA	NA

Independent Site Assessment Information

Name of the Lead Assessor	Initial assessment: Haricleea Spaler Follow up assessment: Anne S. Nistad
Name of the Assessment Firm (if applicable)	Initial assessment: Arche Advisors Follow up assessment: TDi
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Initial assessment: 16-18 May 2023 Follow up assessment: 9 th July 2024
Assessment Period	May 2022 - April 2023

<p>Summary of the Assessment Methodology</p>	<p><u>Initial assessment:</u></p> <p>The assessment methodology included data gathering through:</p> <ul style="list-style-type: none"> • site visit to the fabricator site and community visited around exterior observation • worker and management interviews • document review of policies, procedures, and records related to each of the specific Copper Mark criteria. • selection of documents were sampled to verify implementation of policies and procedures • workers' interviews included sampling: all departments; men and women; recently hired; first aiders; H&S task holders • no contractor agencies at time of the assessment . <p>About the facility: The facility is part of a vertically integrated manufacturer of residential, commercial, industrial and utility grade wire.</p> <p>4 product families are produced over 5 machines: Rod, Wire (2), Chops & Contact.</p> <p>The company receives a majority of its raw material from one supplier near the facility. The facility is located in the East part of Montreal, Canada</p> <p>Permanent workers: 121</p> <p>Temporary workers: up to 5</p> <p><u>Follow up assessment:</u></p> <p>The methodology of the follow-up assessment and verification of the CIP consisted of a site visit to the Nexans facility in Montreal which included:</p> <ul style="list-style-type: none"> • Interviews with employees and management; • Review of documents submitted by Nexans. <p>This follow up assessment was carried out based on the ISO 19011: Guidelines for Auditing Management Systems. Management staff (6 in total, including 1 from Nexans Paris headquarters) were present and participated throughout the assessment, apart from during production staff interviews.</p> <p>On the day and time of the site visit, 15 production staff were on site, 8 of which were interviewed (7 male, 1 female) to verify implementation of the Criterion 10 working hours:</p>
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	<ul style="list-style-type: none"> • 2 group interviews of 2 • 4 individual interviews
Summary of the Assessment Activities	<p>The assessment activities included data gathering through:</p> <ul style="list-style-type: none"> - site visit to the fabricator site and community - observation, worker and management interviews - document review of policies, procedures, and records related to each of the specific Copper Mark criteria. - a sampling approach was used related to the selection of the documents and workers' interviews.

Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	<p>Nexans Montreal implements a management system that integrates all legal compliance elements required by the standard to ensure compliance with national legal requirements including national obligations under international law. There is a commitment to comply with laws and regulations in the Code of Conduct of the Company. The Employee Handbook includes a commitment to comply with labor requirements. The policy is complemented by a register for all legal requirements including status and updates. Licenses and permits are in place for environmental requirements.</p> <p>Top management is responsible for continuous compliance with applicable legislation.</p> <p>This was confirmed through interviews with management; interviews with workers to ensure awareness of relevant legal requirements; and a review of documents including the list of legislation, environmental compliance checklist, code of conduct, employee handbook, and a sampling of permits.</p>
2. Business Integrity	Fully meets	<p>Nexans Montreal has implemented business integrity policies that include the commitments of prohibition and prevention of bribery (including</p>

		<p>facilitation payments), corruption and anti-competitive behaviour.</p> <p>The Nexans Code of Ethics and Business Conduct details the core engagement at all company levels. Ethics are managed at the group level, with 20 people involved in the management of the Nexans Ethics Compliance Program. Senior management is accountable, and breaches in ethics are raised at the annual board meeting.</p> <p>The system is comprised of policies, procedures, training, internal audits to measure effective deployment, local compliance officers (a position held by country lawyers), and human resources safeguards.</p> <p>New employees are trained on the code of conduct in onboarding. The code of conduct is available on the company's online training platform and posted in the workplace. Workers may report any instance of violation of the code of ethics through the grievance mechanism available online at www.nexans.com/en/csr/ethics-andcompliance/Alert-procedure.html.</p> <p>Reports may be filed anonymously.</p> <p>This was confirmed through interviews with management; interviews with workers regarding their knowledge and understanding of business integrity in their roles; facility walk-through; and a review of documents including the code of conduct, board meeting meetings, and the employee handbook.</p>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>Nexans Montreal has a stakeholder map and engagement plan. Stakeholders include employees, clients, investors, legal bodies, raw materials suppliers, neighboring companies, and local residents. Nexans jointly implements procedures to prevent risks of health and safety, warnings in air or water pollution, and</p>

		<p>other procedures in the neighborhood with local companies.</p> <p>Stakeholders can submit grievances, which may be anonymous, to the leaders at https://nexans.gan-compliance.com/caseReport.</p> <p>There are targets for workers – the internal stakeholders – to increase employee engagement and improve the work/life balance by reducing overtime and providing 3-day, stable shifts.</p> <p>This was confirmed through interviews with management and a review of documents including the code of conduct and the list of identified stakeholders and engagement level mapping.</p>
4. Business Relationships	Fully meets	<p>Nexans Montreal follows the corporate policies, procedures, and practices to approach business partner relations, adjust to local level.</p> <p>There are procedures in place to manage all suppliers, essentially for quality requirements. The procedure contains formal due diligence requirements for suppliers.</p> <p>All suppliers are provided with the Nexans Code of Ethics and Business Conduct.</p> <p>The agreements with suppliers contain enforcement language requiring suppliers to comply with the business conduct requirements.</p> <p>This was confirmed through interviews with management regarding the business relations policies, processes, and practices; and a review of documents including specifications in selection of raw material supplier, approved list of raw material suppliers, sample of communications with materials supplier.</p>
5. Child Labor	Fully meets	<p>The Nexans Code of Ethics and Business Conduct establishes the company’s commitment to the prohibition of child labor. Procedures to</p>

		<p>enforce the provision are carried out through human resources. Proof of age of the employees indicates no child labor or young workers. There were no labour service providers at the time of the assessment.</p> <p>This was confirmed through interviews with management and human resources; a facility walkthrough in which it was observed that there were no young workers present with restrictions to work in an industrial site or hazardous activities; interviews with workers who confirmed no historic child labor practices; and a review of corporate policies to prohibit child labor.</p>
6. Forced Labor	Fully meets	<p>The Nexans Code of Ethics and Business Conduct commits Nexans Montreal to prohibit forced, involuntary or child labor, including prison, bonded, indentured, human-trafficked or otherwise.</p> <p>Interviews with management confirmed implementation of the policy. Interviews with workers confirmed jobs were sought from workers' own initiative. No indicators of involuntary labor were detected on site. It was confirmed that overtime is requested on a voluntary basis.</p>
7. Freedom of Association and Collective Bargaining	Fully meets	<p>Nexans Montreal commits to respect freedom of association and collective bargaining. There is one union present, which operates without involvement from management. Employees are free to join the union without restrictions, they hold meetings on a monthly basis and the minutes are communicated to the workers.</p> <p>There are several worker committees at the site, as well as a freely negotiated collective bargaining agreement (CBA). There was a strike during the most recent negotiations of the CBA (September 2022). There was no retaliation against participants in the strike and it ended constructively with</p>

		<p>the signing of the CBA by both the union and management.</p> <p>This was confirmed through interviews with management; interviews with workers; interviews with representatives from the union, a facility walkthrough; and a review of documents including the CBA, corporate policy on human rights, meeting minutes from discussions between union representatives and management, and job descriptions.</p>
8. Discrimination	Fully meets	<p>Nexans Montreal implements corporate-level policies to prevent discrimination and harassment. Training about the policy is provided as part of the worker onboarding, and signage is posted in the facility. Workers are aware of the policy and the grievance channels in which to communicate violations of the policy. All interviewed workers stated they are treated equally within the company.</p> <p>This was confirmed through interviews with management; interviews with workers including union representatives; a facility walkthrough; and a review of documents including the discrimination, harassment, and retaliation prevention policy, collective bargaining agreement, job descriptions, and the Nexans Code of Ethics and Business Conduct.</p>
9. Gender Equality	Fully meets	<p>Nexans Montreal implements corporate-level policies on gender equality. 14% of workers are women.</p> <p>Implemented policies indicate no gender-specific preference for hiring, employment, training, and promotions.</p> <p>Management states they are actively looking for opportunities to increase the number of women employees but did not observe an increase of women candidates' applications.</p> <p>This was confirmed through interviews with management; interviews with workers including union</p>

		<p>representatives; a facility walkthrough; and a review of documents including the discrimination, harassment, and retaliation prevention policy, collective bargaining agreement, job descriptions, and a sample of payroll records.</p>
<p>10. Working Hours</p>	<p>Fully meets</p>	<p>As of the follow up assessment on 9th July 2024, the site fully meets this criterion.</p> <p>Nexans Montreal has begun to develop policies, procedures, and practices to keep employees' regular and overtime working hours within legally required limits of 48 hours per week. Implementation has started but is not complete.</p> <p>The site operates on shift schedules, registered through an electronic time system. Breaks are provided, and workers are guaranteed a day of rest every seven days. Working hours are recorded. Overtime is voluntary and preference is given to interested workers with the least overtime hours.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Approximately 10% of the production workforce performed excessive overtime, an average above the legal limit of 48 hours total weekly hours. <p>Note that management has begun to develop policies, procedures and practices (management system) to keep employees' regular and overtime hours within legally required limit of 48 hours per week. Implementation has started but it is not yet complete</p> <p>This was confirmed through interviews with management; interview with workers; observation of the electronic system; and a review of documents including the collective bargaining agreement, 12 months of attendance records, and overtime report.</p> <p>During the follow up assessment on 9th July 2024, the assessor verified the</p>

		<p>policies and practices keep employees' regular and overtime working hours within legally required limits of 48 hours per week.</p> <p>This was confirmed through interviews with management; interview with workers; observation of the electronic system; and a review of documents including attendance records, and overtime reports.</p> <p>The reviewed evidence indicates that the corrective actions have been fully implemented.</p>
11. Remuneration	Fully meets	<p>Remuneration is defined in the collective bargaining agreement negotiated between Nexans Montreal and the union on behalf of all workers, even those not part of the union. Wages are paid well above the legal minimum wage for each of the 5 wage bands defined in their wage grid. Workers outside the union are also paid above the minimum wage.</p> <p>Overtime is paid at a rate of 1.5x and 2x for more hours in excess of 11 hours per shift, weekends, or during statutory leave.</p> <p>This was confirmed through interviews with management to explain the process; interviews with workers; and a review of documents including sampled pay slips, the collective bargaining agreement, and the Nexans Code of Business Ethics.</p>
12. Occupational Health and Safety	Fully meets	<p>Nexans Montreal has risk assessments for health and safety as well as responsible persons for safety topics. Health and safety procedures are implemented throughout the facility. Training is regularly provided to workers.</p> <p>The facility implements comprehensive occupational health and safety measures which include health safety inspections, accident reporting and investigations, hazard assessment and management, emergency</p>

		<p>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>Management focuses on raising awareness among the workers on risk assessments for each task carried out.</p> <p>This was confirmed through a health and safety tour of the facility; interviews with management; interviews with workers to confirm understanding and training; and a review of documents including the risk assessments for health and safety, fire risk plans, prevention plans, and nominations of the responsible persons for safety topics.</p>
<p>13. Grievance Mechanism</p>	<p>Fully meets</p>	<p>The grievance procedure and corresponding grievance committee was negotiated through and is documented in the collective bargaining agreement. The grievance mechanism is available for all workers, whether or not they are members of the union.</p> <p>Workers are aware of the channels of communication, and information about the grievance mechanism is posted throughout the facility. The system meets the requirements of the UNGP effectiveness criteria.</p> <p>The grievance committee includes union members and meets monthly with management.</p> <p>Workers are able to contact senior management on issues that cannot be resolved with their supervisors.</p> <p>During the negotiations of the latest CBA in September 2022, the main grievances were addressed and resolved.</p> <p>This was confirmed through interviews with management; interviews with workers; facility walkthrough; and a</p>

		<p>review of documents including the Nexans Code of Ethics and Business Conduct, the CBA, and the notes from grievance committee meetings.</p>
14. Environmental Risk Management	Fully meets	<p>Nexans Montreal is in the process of being certified under ISO 14001 and has a corporate and local Environmental, Health and Safety Management policy. Permits and mandatory reporting requirements are in place. Management has identified environmental impacts. Based on the impacts identified, Nexans Montreal established a sustainability roadmap, with clear targets on how to reduce the negative effects and an action plan.</p> <p>There are adequate practices in place to manage chemical storage and handling, waste handling, air emissions, water use, and wastewater.</p> <p>This was confirmed through interviews with management; interviews with workers, facility walkthrough; and a review of documents including permits, required reports, assessment reports, waste inventory, and the environmental aspects table.</p>
15. Greenhouse Gas (GHG) Emissions	Fully meets	<p>Nexans has targets at corporate level and at Nexans Montreal to reduce greenhouse gas emissions (GHG). These are based on a GHG baseline data from 2019.</p> <p>There is a system to gather data covering all 3 scopes, complemented by monitoring and a roadmap for future steps to reduce emissions.</p> <p>Nexan's greenhouse gas (GHG) emissions targets in line with the Science Based Targets Initiative (SBTi) to</p> <ul style="list-style-type: none"> • reduce absolute Scope 1 and 2 GHG emissions by 46.2% by 2030 versus 2019 base year. • reduce absolute Scope 3 GHG emissions by 24% by 2030 versus 2019 base year.

		<p>At site level, there is a commitment to reduce emissions by nearly half between 2019 and 2030.</p> <p>Nexans Montreal has identified the main sources of each scope, as well as the projects needed to meet the targets fully. Projects include initiatives such as changing to green electric heating from gas heating, noting that in Canada electric is green, increasing efficiency in production, and replacing the energy type.</p> <p>This was confirmed through interviews with management; facility walkthrough; and a review of documents including baseline data, and 2021 sustainability report available here.</p>
16. Energy Consumption	Fully meets	<p>Nexans Montreal tracks energy consumption and sets targets to increase efficiency and reduce energy waste. Energy consumption is embedded in business KPIs.</p> <p>Nexans corporate maintains an energy tracking register, into which Nexans Montreal submits site-level data. Monitoring began in January 2023.</p> <p>This was confirmed by interviews with management; a facility walkthrough to observe the main energy consuming activities; and a review of documents including the energy tracking register, environmental policy, and energy monitoring data for 2023.</p>
17. Freshwater Management and Conservation	Fully meets	<p>Nexans Montreal has a process to identify the water-use impacts and risks in collaboration with relevant stakeholders (local government and neighboring companies) and to implement measures to ensure that water consumption does not restrict availability/access for other water users. The processes are aligned with regulatory requirements. Nexans Montreal tracks both water use and wastewater data, with a goal to re-introduce used water into the production cycle.</p>

		<p>Freshwater comes from the city of Montreal. Raw water is treated by a plant on site before use. The cooling water process uses 100% recycled water. Effluents are monitored and sampled, including rainwater.</p> <p>This was confirmed through interviews with management; facility walkthrough to understand water consumption activities; and a review of documents including quarterly sampling of process wastewater, water monitoring data for 2023, and the Environmental Compliance Verification (ECV) Report from January 2023.</p>
18. Waste Management	Fully meets	<p>Nexans Montreal has a policy to reduce emissions and reduce the use of hazardous substances in processing and in finished products. The facility has an objective to divert waste from the landfill and increased recycling of the generated waste. There are targets to reduce all waste categories.</p> <p>Segregation of waste is made at source of hazardous and non-hazardous waste.</p> <p>No hazardous or residual materials are buried on the site.</p> <p>Nexans Montreal maintains records of the generated wastes and reports are submitted to the environmental authorities with documented follow up for waste management.</p> <p>This was confirmed through interviews with management, facility walkthrough to observe waste management processes; and a review of documents including the Nexans Group environmental policy, Annual report on the management of residual hazardous materials, the residual hazardous materials register 2022, and the annual report on the management of residual hazardous materials.</p>
19. Tailings Management	Not applicable	<p>This criterion does not apply to non-mining sites.</p>

<p>20. Pollution</p>	<p>Fully meets</p>	<p>Nexans Montreal has a process to identify sources of pollution and has implemented plans to reduce pollution. Soil and water pollution was not identified. Pollution to air are associated with the operation of the melting furnace, from the pickling system, and remain within legally compliant limits.</p> <p>Ongoing monitoring is in place, and mitigation efforts are ongoing, including in collaboration with the city of Montreal.</p> <p>This was confirmed through interviews with management; facility walkthrough to observe sources of pollution; and a review of documents including the effluent characterisation report for the 4th quarter of 2022, the sampling of process wastewater on the property of Nexans Canada inc., and waste inventory – 2022.</p>
<p>21. Biodiversity and Protected Areas</p>	<p>Not applicable</p>	<p>The facility is located within an industrial area.</p> <p>The assessment confirmed that Nexans Montreal has a policy in place that includes the review of potential environmental impacts.</p>
<p>22. Mine Closure and Reclamation</p>	<p>Not applicable</p>	<p>This criterion does not apply to non-mining sites.</p>
<p>23. Community Health and Safety</p>	<p>Fully meets</p>	<p>Nexans Montreal has assessed the potential health and safety impacts on the community. There is a grievance mechanism available to the community, which has received a noise complaint that was addressed through the grievance process.</p> <p>Nexans Montreal collaborates with its industrial neighbors to implement a contingency plan for various emergency situations that could affect the community.</p> <p>The Environmental Compliance Verification is periodically completed through site visits and interviews with various stakeholders. These included</p>

		<p>considerations on emissions, air conditioner inspections, and identification of MDR containers.</p> <p>As a results of the non-conformances and observations identified, management developed a method to track the progress to of corrective actions. Although the measurements of some indicators previously exceeded the maximum limits, at the moment of the audit, these were in legal benchmarks. The installed measuring device is to keep track and prove in the long term that they do not exceed and that they remain within legal limits.</p> <p>This was confirmed through interviews with management; facility walkthrough and surrounding area observations; and a review of documents including the environmental aspects table, effluent characterization report for the 4th quarter of 2022, legal and regulatory compliance table related to health and safety, and the “Environmental Compliance Verification (ECV) Report dated 16 January 2023” which analyzes impacts on the neighboring community.</p>
24. Community Development	Fully meets	<p>Nexans Montreal engages in community development activities, which are seen as important by the workers and corporate headquarters. Activities include local cleanup projects, inviting the community to the facility, and donations. Additionally, Nexans Montreal uses a local supplier for raw materials.</p> <p>The main community development stakeholders are the local authorities and two neighboring companies. There are residential buildings located more than 5 kilometers away from the facility. The stakeholders are invited for a day at the site to discuss their operations and ask for feedback.</p> <p>Based on the circumstances, the assessor determined that interviews</p>

		<p>with nearby communities are not required as part of the evaluation.</p> <p>Workers were interviewed about the engagement projects with the local community, and they were excited that the company engages them and even asks their opinion on potential ideas.</p> <p>This was confirmed through interviews with management; interviews with employees; and a review of documents including the community activities archive.</p>
25. Artisanal and Small-Scale Mining	Not applicable	The assessment confirmed there is no ASM in the area of influence.
26. Human Rights	Fully meets	<p>The human rights policy at corporate level commits Nexans Montreal to the UN Declaration of Human Rights and ILO conventions. Each group company, such as Nexans Montreal, is expected to manage human rights practices as facility level.</p> <p>The human rights policy, suppliers code of conduct, and other related documents are communicated to all stakeholders. The human rights policy is posted on the company website.</p> <p>Suppliers are subject to a risk assessment on human rights in the approval process.</p> <p>A grievance channel is available in the human resources platform and posted in work areas. No human rights related grievances were received in the assessment period.</p> <p>This was confirmed through interviews with management; a facility walkthrough; and a review of documents including the human rights policy, grievance process, submitted grievances, and company website.</p>
27. Security and Human Rights	Not applicable	This criterion does not apply to non-mining sites.
28. Indigenous Peoples' Rights	Not applicable	The assessment confirmed that there are no Indigenous Peoples communities in the area of influence.

29. Land Acquisition and Resettlement	Not applicable	The assessment confirmed the facility is in an industrial park with no plans of land acquisition.	
30. Cultural Heritage	Not applicable	The assessment confirmed the facility is not located in or near a cultural heritage site.	
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>As of the follow up assessment on 9th July 2024, the site fully meets this criterion.</p> <p>Nexans due diligence in mineral supply chains is managed at corporate level. The corporate policies are limited to conflict minerals, focusing on tin, tantalum, tungsten, gold, and mica (i.e., not covering copper), and not specific to the OECD.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> • Although there is a due diligence procedure, it is not aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or the Copper Mark Copper Standard. <p>During the follow up assessment on 9th July 2024, the assessor verified that the site has implemented a due diligence procedure which is aligned with the OECD Due Diligence Guidance.</p> <p>Nexans conducts due diligence for copper purchasing, including external validation and investigations where appropriate. 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	As of the follow up assessment on 9 th July 2024, the site fully meets this criterion.

			<p>Nexans has a conflict minerals policy supported by checks with suppliers that purchased minerals originate from conflict-free zones and exercises its duty of care. Should it transpire that one of its supply sources is not conflict-free, the Group will take all necessary actions to remedy the situation, in line with the Group's Conflict Mineral Policy signed by the Vice President for Purchasing, and the sustainable purchasing policy updated in 2020.</p> <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • The policy does not cover the OECD or Annex II risks or copper. • Nexans does not communicate the supply chain policy consistent with Annex II of the OECD Guidance to business partners with respect to sourcing minerals, including Copper, from CAHRAs. • Relevant training for copper purchases are not complete. <p>During the follow up assessment it was verified that Nexans has developed a procedure which outlines its process for sourcing copper which is aligned with and references the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.</p>
	<p>31.b. Red Flag Identification Process</p>	<p>Fully meets</p>	<p>As of the follow up assessment of 9th July 2024, this criterion is fully meets.</p> <p>The Nexans Responsible Purchasing policy defines the following four actions to strengthen vigilance on the conflict minerals suppliers:</p> <ul style="list-style-type: none"> • Suppliers of conflict minerals must sign the Nexans CSR Charter every year. • Suppliers of "conflict minerals" must provide a CSR scorecard every three years.

			<ul style="list-style-type: none"> • The CSR audit must be conducted on suppliers of conflict minerals as a priority; • The CSR Risk Purchasing Committee reviews the suppliers of conflict minerals as a priority. <p>The following gaps were identified:</p> <ul style="list-style-type: none"> • This process does not apply to copper. • This process does not cover the risks in Annex II of the OECD Due Diligence Guidance. <p>During the follow up assessment, it was verified that the revised procedure includes risk levels of suppliers of copper based on the presence of an external verification on due diligence processes and / or LME compliance, as well as whether material originates in a CAHRA or not. During the assessment period, one supplier was deemed high-risk.</p>
	31.c. Risk Assessment Process	Fully meets	<p>As of the follow up assessment on 9th July 2024, this element is fully meets.</p> <p>During the follow up assessment, the assessors confirmed that Nexans has a process to conduct a risk assessment where red flags are identified. This includes additional desk-based due diligence, and an on-site assessment or review of existing site assessments where applicable.</p>
	31.d. Risk Management Process	Fully meets	<p>As of the follow up assessment on 9th July 2024, this element is fully meets.</p> <p>During the follow up assessment, the assessors confirmed that Nexans' due diligence procedure includes steps related to the prevention, mitigation and actions implemented by the supplier regarding their specific product, country or industry related risks. If the supplier fails to demonstrate a proper management of their CSR risks, a mitigation action plan will be requested by Nexans and must be implemented within a deadline and</p>

			agreed with the supplier. Failure to implement a mitigation plan could result in removal of the supplier.
	31.e. Public Reporting	Fully meets	<p>As of the follow up assessment on 9th July 2024, the site fully meets this criterion.</p> <p>The current practices do not cover OECD and Annex II risks for copper.</p> <p>During the follow up assessment, it was verified that Nexans has produced a report on its due diligence practices in a manner coherent with the OECD Step 5 report in its <u>Vigilance Plan, Report 2023</u>.</p>
	32. Transparency and Disclosure	Fully meets	<p>As of the follow up assessment on 9th July 2024, the site fully meets this criterion.</p> <p>The annual report is publicly available on the company’s website, under the title <u>2022 Universal Registration Document</u>. The annual report establishes the company’s commitment to transparency and disclosure. The annual report on environmental, social and governance performance is in line with an internationally recognized standard (GRI).</p> <p>All information communicated during the assessment was validated by document review, interviews with management and employees.</p> <p>The following gap was identified:</p> <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. <p>During the follow up assessment on 9th July 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</p>

		responsible and transparent mineral production. The corrective actions have been fully implemented.
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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 21 June 2024.	<input type="checkbox"/>
The site is found to miss some or all of the applicable criteria of the Risk Readiness Assessment. The site has committed to continuous improvement to fully meet all applicable Copper Mark Criteria by 21 June 2024.	<input type="checkbox"/>
The site misses some or all of the applicable requirements of the Risk Readiness Assessment. The Site has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
Additional comments:	

Award

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

This Summary Report is prepared using data from the independent accountant's assurance report and the independent assessor report. The Copper Mark confirms the assessors' opinion and awards the relevant metal Mark(s) as follows

Date the Copper Mark is awarded	28 August 2023
Expiry Date of the Copper Mark	27 August 2026