



## The Copper Mark Summary Report

### Site Information

Name of the Site	Aurubis Olen NV
Unique identifier provided by the Copper Mark	P0052
Address	Watertorenstraat 35
Country of Operation	Belgium
Products produced on site (e.g., concentrate, anodes, cathodes, sulphuric acid, slag, etc.)	Copper cathodes
Metals produced on site (e.g., copper, gold, nickel, silver, molybdenum)	Copper
Metals included in scope (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 checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other ( <i>please explain</i> )	Fabricator
Infrastructure owned or controlled by the site and included in scope	
Roads	<input type="checkbox"/>
Rails	<input type="checkbox"/>

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

### Equivalency Check

Upon receiving the pre-assessment checklist, the Copper Mark did a review of equivalent certificates and third-party assurances.

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 <i>(Name, date of assurance / certification)</i>	Review Process	Criteria Covered by Equivalency
NA	NA	NA

### Independent Site Assessment Information

Name of the Lead Assessor	Josue Ruiz
Name of the Assessment Firm (if applicable)	RCS Global
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	HQ: 27, 28 April and 2 May 2022 Site: 7. July 2022
Assessment Period	27 September 2021 – 26 September 2022
Summary of the Assessment Methodology	<p>The entire assessment process is aligned with ISO19011 requirements. The assessment methodology is comprised of three main phases as follows:</p> <ul style="list-style-type: none"> <li>a) Planning of the assessment strategy</li> <li>b) Execution of the onsite assessment</li> <li>c) Assessment conclusion and reporting</li> </ul> <p>A Final Summary Assessment report and Independent Assurance Statement are completed after the onsite assessment.</p>
Summary of the Assessment Activities	<p>Headquarters:</p> <ul style="list-style-type: none"> <li>• Opening meeting</li> <li>• Company introduction and determination of scope</li> <li>• Understanding Aurubis' due diligence management system</li> <li>• Document review</li> </ul>

	<ul style="list-style-type: none"> <li>• Transactions traceability review and due diligence files review</li> <li>• Summarize audit findings and conduct closing meeting with the management</li> </ul> <p>Site:</p> <ul style="list-style-type: none"> <li>• Opening meeting</li> <li>• Company introduction and determination of scope</li> <li>• Onsite facility tour</li> <li>• Document review</li> <li>• Closing meeting</li> </ul>
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### Summary of Findings

Criteria	Rating <i>Fully meets, partially meets, does not meet, not applicable</i>	Comments
1. Management System	Fully meets	<p>Olen has a medium-complexity supply chain with fewer than 200 suppliers of mined and recycled material.</p> <p>Due diligence in mineral supply chains is handled primarily at corporate headquarters.</p> <p>The follow observation was made:</p> <ul style="list-style-type: none"> <li>• Relevant personnel could be better trained on responsible sourcing holistically such as why the company engages in responsible sourcing across raw materials, as well as how employees can support risk identification; and on implementation to ensure it fits clearly into a reporting and risk management structure.</li> </ul>
2. Red Flag Identification Process	Fully meets	<p>Olen follows the Aurubis Business Partner Code of Conduct, which is confirmed to be appropriate to the nature, scale, and operational context of the company. This is supported by a policy (available <a href="#">here</a>) adequate resources and clear roles and responsibilities.</p> <p>There is a system of transparency and controls. Aurubis works with suppliers to gather and collect necessary information and build capacity where appropriate.</p>

		<p>The due diligence management system includes a process for continuous improvement of due diligence implementation over time, to ensure its implementation.</p> <p>The following observation was made:</p> <ul style="list-style-type: none"> <li>All of the sites are not optimally integrated into risk identification processes as there is no formal integration of site level incoming material, material origin and transit route checks into corporate risk identification process (supplier screening)</li> </ul>
3. Risk Assessment Process	Fully meets	<p>The company's process to collect, review, and retain information for red flags identification is appropriate to the nature, scale and operational context of the company.</p> <p>There is a system to identify conflict-affected and high-risk areas that is confirmed to be appropriate and consistently yield reasonable results.</p> <p>Red flags related to country of origin have been identified.</p>
4. Risk Management Process	Partially meets	<p>There is an established process to conduct risk assessments with credible information and identify annex II risks in the supply chain.</p> <p>The following areas for improvement were identified:</p> <ul style="list-style-type: none"> <li>Adopt a consistent and systematic process to determine the need for on-the-ground risk assessments</li> <li>Conduct on-the-ground risk assessments for the identified suppliers</li> </ul>
5. Public Reporting	Partially meets	<p>There is a risk mitigation action plan which is effective in responding to risks within appropriate timelines. It is appropriate to the type and scale of the risks of adverse impacts and actual adverse impacts and the company's position along the supply chain. Mitigation includes stakeholder engagement in line with the strategy and impacts.</p> <p>It is supported by sufficient resources and implemented consistently.</p> <p>The steps taken by the company to build and/or exercise influence over suppliers are</p>

		<p>reasonable, given the company position along the supply chain and the risks assessed.</p> <p>The following gap was identified:</p> <ul style="list-style-type: none"> <li>The company's report does not provide detail about on the concerns related to the on-the-ground risk assessment and risk assessment implementation</li> </ul>
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## Conclusions

Performance Determination	
The site is found to fully meet the conformance criteria of the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (Joint Due Diligence Standard).	<input type="checkbox"/>
The site is found to fully meet or partially meet the conformance criteria of the Joint Due Diligence Standard and has committed to continuous improvement at the site to fully meet the conformance criteria by 18 July 2023.	<input checked="" type="checkbox"/>
The site is found to miss some or all of the conformance criteria of the Joint Due Diligence Standard and has committed to continuous improvement at the site to fully meet all conformance criteria by 18 July 2023.	<input type="checkbox"/>
The site misses some or all of the conformance criteria of the Joint Due Diligence Standard and has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
Additional comments:	

## Assurance Process Information

Date of Performance Determination (dd/mm/yyyy)	
Re-assessment Due Date (dd/mm/yyyy)	