



The Copper Mark Summary Assessment Report

Copper Producer Information

Name of the Copper Producer Site	Aurubis Bulgaria AD
Unique identifier provided by the Copper Mark	P0009
Address	City of Pirdop 2070, Industrial Zone
Country of Operation	Bulgaria
Metals in scope	Copper
Types of operations included in scope (<i>select all that apply</i>)	
Mining	<input type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input type="checkbox"/>
Smelting	<input checked="" type="checkbox"/>
Refining	<input checked="" type="checkbox"/>
Other (<i>please explain</i>)	

Copper Mark Information

Date the Copper Mark is awarded (dd/mm/yyyy)	23/04/2021
Expiry Date of the Copper Mark (dd/mm/yyyy)	22/04/2024

Assessment Information

Name of the Lead Assessor	David Shirley Assessment against Criterion 31: Josue Ruiz
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Name of the Assessment Firm (if applicable)	Corporate Integrity Assessment against Criterion 31: RCS Global
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	01/03/2021-03/31/2021 Site visit: 16/03/2021-18/03/2021 Assessment against Criterion 31: 27 May 2022 Follow up assessment against Criterion 31: 15 June 2023
Assessment Period	01/01/2019 – 31/12/2020
Summary of the Assessment Methodology	<p>Assurance activities were risk based with focus on material issues and included review of:</p> <ol style="list-style-type: none"> 1. processes in place to identify and prioritise ESG risks and opportunities; 2. the policies, systems and approaches that Aurubis is using to manage these risks and opportunities; and 3. the collection and assimilation of reported performance information.
Summary of the Assessment Activities	<p>Step 1 – Document Review and preparation for site visit</p> <ol style="list-style-type: none"> 1. Documents uploaded and requests for more information provided 2. Corporate Integrity reviewed uploaded information. Identified expected focus areas for the review based on the scope and risk profile. 2. Clarification discussions with Copper Mark 3. Corporate Integrity prepared for site visit and agreed a detailed agenda with site management. <p>Step 2 – Site Visit</p> <ol style="list-style-type: none"> 1. Kick off meeting with management team <ol style="list-style-type: none"> a) Overview of operations and management structure b) Overview of material risks and risk management processes 2. Site walkabout and selective interviews with workers and other stakeholders 3. For each focus area, conducted meetings with key personnel. Meetings covered:

	<p>a) review, discuss related risks</p> <p>b) review of evidence</p> <p>c) review of performance metrics</p> <p>4. Close out meeting</p> <p>Step 3 – Assurance statement and management report</p> <p>1. Additional needed data uploaded and reviewed</p> <p>2. Corporate Integrity requested further clarification for gaps in the information received</p> <p>3. Corporate Integrity provided assurance on final site self-assessment declaration against all CM criteria in scope.</p> <p>Corporate Integrity provided a formal signed site management report explaining the reasoning behind the assurance findings, any corrective measures required and opportunities for improvement.</p>
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Equivalencies and Non-Applicable Criteria

The following criteria were confirmed to be not applicable to the Copper Producer:	<p>19. Tailings Management</p> <p>22. Mine Closure and Reclamation</p> <p>25. Artisanal and Small Scale Mining</p> <p>27. Security and Human Rights</p> <p>28. Indigenous Peoples Rights</p> <p>29. Land Acquisition and Resettlement</p> <p>30. Cultural Heritage</p>
The following equivalent systems were applied (add more rows as appropriate)	
Equivalent System <i>(Name, date of assurance / certification)</i>	Criteria Covered by Equivalency
ISO 45001:2018 02/10/2019	12. Occupational Health and Safety
ISO 14001:2015 15/03/2018	14. Environmental Risk Management 16. Energy Consumption 18. Waste Management 20. Pollution

Summary of Findings

Criterion	Rating <i>Fully meets, partially meets, does not meet, not applicable</i>	Comments
1. Legal Compliance	Fully Meets	<p>Aurubis Bulgaria AD has a management system in place that ensure compliance with all national legal requirements including national obligations under international law.</p> <p>Health Safety and Environment legal requirements are part of the certified ISO14001 and ISO45001 systems.</p>
2. Business Integrity	Fully Meets	<p>Aurubis Bulgaria AD has a management system in place that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior. These policies are primarily codified in the Employee Handbook, the Aurubis Business Partner Code of Conduct and the Anti-Corruption Compliance Policy.</p>
3. Stakeholder Engagement	Fully Meets	<p>Aurubis Bulgaria AD has an established stakeholder mapping process including a SWOT analysis, implements an engagement plan, and has a grievance mechanism.</p> <p><i>Grievances can be submitted at the following e-mail: info.pirdop@aurubis.com</i></p>
4. Business Relationships	Fully Meets	<p>Aurubis Bulgaria AD promotes responsible business practices with significant business partners, including suppliers. This is supported through contractor</p>

		management and Aurubis Business Partner Screening.
5. Child Labor	Fully Meets	Aurubis Bulgaria AD has a management system in place to prevent the employment of children under the age of 15, prevents the worst forms of child labor, and prevents the exposure of employees under the age of 18 to hazardous work in line with the ILO Conventions No. 138 and No.182. This is codified in the Code of Conduct and Aurubis Business Partners Code of Conduct.
6. Forced Labor	Fully Meets	Aurubis Bulgaria AD has a management system in place to prevent the use of any forms of forced labor and participation in acts of human trafficking in line with ILO Conventions No. 29 and No. 105. This is codified in the Code of Conduct.
7. Freedom of Association and Collective Bargaining	Fully Meets	Aurubis Bulgaria AD has a process to respect employees' rights to freedom of association and to collective bargaining in line with ILO Conventions No. 87 and No. 98, participate in collective bargaining processes in good faith and not obstruct alternative means of association where there are legal restrictions. The result of this is the Collective Bargaining Agreement.
8. Discrimination	Fully Meets	Aurubis Bulgaria AD has a process to prevent and address all forms of harassment and discrimination in the workplace in line with ILO Conventions No. 100 and No. 111. This is codified in the Code of Conduct and the Collective Bargaining Agreement.
9. Gender Equality	Fully Meets	Aurubis Bulgaria AD has a process to continually assess and monitor progress to ensure the

		implementation of a policy on gender equality in the workplace. This is codified in the Code of Conduct and the Collective Bargaining Agreement.
10. Working Hours	Fully Meets	Aurubis Bulgaria AD has a process to keep employees' total regular and overtime working hours to 60 hours per week unless defined otherwise by applicable law or a collective bargaining agreement; and to ensure overtime is voluntary, provide one rest day in seven; and, provide annual leave. This is complemented by restrictions imposed by Bulgarian Law and codified in in the Employee Handbook and the Collective Bargaining Agreement.
11. Remuneration	Fully Meets	Aurubis Bulgaria AD has a proess to pay wages that equal or exceed the national minimum wage, the appropriate industry wage (if higher), or a living wage. Wages are calculated at a competitive rate.
12. Occupational Health and Safety	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through ISO 45001:2018.
13. Grievance Mechanism	Fully Meets	Aurubis Bulgaria AD has established and implemented a grievance mechanism accessible to all employees through internal portals and other mechanisms.
14. Environmental Risk Management	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through ISO 14001:2015.
15. Greenhouse Gas (GHG) Emissions	Fully Meets	Aurubis Bulgaria AD has a process to quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting

		protocols, specifically the European Union emissions Trading System (EUETS) GHG Protocol and Science-Based Targets. Public reporting available here .
16. Energy Consumption	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through ISO 14001:2015.
17. Freshwater Management and Conservation	Fully Meets	Aurubis Bulgaria AD has a process in place to conduct a comprehensive assessment of water-use impacts and risks in collaboration with relevant stakeholders and to implement measures to ensure that water consumption does not restrict availability/access for other water users or reduce the range and populations of fauna and flora in the catchment area of the site / facility. Quality of water to the site are monitored and regulated.
18. Waste Management	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through ISO 14001:2015.
19. Tailings Management	NA	
20. Pollution	Fully Meets	The Independent Review confirmed that the site meets the requirement as validated through ISO 14001:2015.
21. Biodiversity and Protected Areas	Fully Meets	Aurubis Bulgaria AD has a process in place to implement the mitigation hierarchy to avoid, minimize, reduce and compensate for adverse impacts on biodiversity; to avoid adverse impacts to Critical Habitats or Endangered Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless

		specifically and legally permitted. The process is under regulation by the Bulgarian authorities.
22. Mine Closure and Reclamation	NA	
23. Community Health and Safety	Fully Meets	Aurubis Bulgaria AD has a management system to monitor, avoid, minimize, reduce and compensate for adverse impacts on community health and safety. This is complemented by a permanent monitoring programme at community locations.
24. Community Development	Fully Meets	Aurubis Bulgaria AD has a process in place to identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development. This is supported by local-level partnership programmes.
25. Artisanal and Small Scale Mining	NA	
26. Human Rights	Fully Meets	Aurubis Bulgaria AD has processes in place to implement the UN Guiding Principles on Business and Human Rights including human rights due diligence. The site has publicly committed to following the UN Guiding Principles and the UN Global Compact and the requirements for these are reflected in the Code of Conduct and the Aurubis Business Partner Code of Conduct.
27. Security and Human Rights	NA	While not applicable for smelter / refiner sites, the presence of armed security personnel lead to a review of this criterion. Despite its inapplicability, Aurubis Bulgaria AD has the processes in place to implement the Voluntary Principles on Security and Human Rights.

28. Indigenous Peoples' Rights	NA	
29. Land Acquisition and Resettlement	NA	
30. Cultural Heritage	NA	
31. Due Diligence in Mineral Supply Chains	Fully Meets	<p>As of the follow up assessment of 15 June 2023, this criterion is fully meets in accordance with the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc.</p> <p>Aurubis Bulgaria AD has a medium-complexity supply chain with fewer than 100 suppliers of mined and recycled material.</p> <p>Due diligence in mineral supply chains is handled primarily at corporate headquarters.</p>
	31.a. Management System	<p>Fully Meets</p> <p>Aurubis Bulgaria AD 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 here) 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>
	31.b. Red Flag Identification Process	<p>Fully Meets</p> <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>
	<p>31.c. Risk Assessment Process</p>	<p>Fully Meets</p>	<p>As of the follow up assessment of 15 June 2023, this criterion is fully meets.</p> <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"> • Adopt a consistent and systematic process to determine the need for on-the-ground risk assessments • Conduct on-the-ground risk assessments for the identified suppliers <p>During the follow up assessment, it was verified that there is a clear and comprehensive set of new risk assessment criteria, including guidelines for conducting onsite visits. The risk assessment has been completed for all suppliers classified as high- and medium-risk. Identified risks undergo additional verification and enhanced desktop review.</p> <p>Onsite assessments are conducted to validate any red flags. Sufficient resources are available to carry out these visits. While the majority of the site visits have been completed, the remaining visits are planned for this year.</p>

	31.d. Risk Management Process	Fully 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. There is ongoing monitoring through subscriptions, engagement with different schemes, regular updates of supplier information, and grievance mechanisms.</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 reasonable, given the company position along the supply chain and the risks assessed.</p>
	31.e. Public Reporting	Fully Meets	<p>As of the follow up assessment of 15 June 2023, this criterion is fully meets.</p> <p>At corporate level, Aurubis reports on the due diligence practices, providing detail about the policies and implementation of all requirements of the standard.</p> <p>The Step 5 report is available here.</p>
32. Transparency and Disclosure		Fully Meets	<p>Aurubis Bulgaria AD has processes to annually report on environmental, social and governance performance in line with GRI. Reporting on EITI implementation is not applicable.</p> <p>Aurubis Bulgaria AD publicly reports on this in the Aurubis Annual Report, in the Non-Financial Report available here and the Aurubis</p>

	Sustainability Report, available here .
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Assessment Conclusions

Statement of conformance	
The site is found to fully meet all applicable requirements of the Risk Readiness Assessment and the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc.	<input checked="" type="checkbox"/>
The site is found to fully meet or partially meet all applicable requirements of the Risk Readiness Assessment and has committed to continuous improvement at the site to fully meet all applicable Copper Mark Criteria by 21/07/2022.	<input type="checkbox"/>
The site is found to miss some or all of the applicable requirements of the Risk Readiness Assessment, and has committed to continuous improvement at the site to fully meet all applicable Copper Mark Criteria by 21/07/2022	<input type="checkbox"/>
The site misses some or all of the applicable applicable requirements of the Risk Readiness Assessment and has not committed to continuous improvement.	<input type="checkbox"/>
Limitations:	
Additional comments:	