



Assessment Summary Report

Participant Information

Name of the Site	Aurubis Olen NV
Unique identifier provided by the Copper Mark	P0052
Address	Watertorenstraat 35
Country of Operation	Belgium
Copper 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 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 checked="" type="checkbox"/>
Refining	<input checked="" 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 checked="" type="checkbox"/>

Other (please explain)

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 Valid until 11 July 2024</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 Valid until 17 October 2024</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 	<ul style="list-style-type: none"> • 14. Environmental Risk Management • 16. Energy Consumption • 18. Waste Management • 20. Pollution

	<ul style="list-style-type: none"> Covering the same scope as the Copper Mark Responsible Production Criteria, including operations, locations, and materials Accompanied by improvement plans where applicable 	
<p>Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc</p> <p>27-28 April, 20-21 June 2022</p> <p>Follow up: 15 June 2023</p>	NA	Criterion 31: Due diligence in mineral supply chains

Independent Site Assessment Information

Name of the Lead Assessor	David Shirley
Name of the Assessment Firm (if applicable)	Corporate Integrity Ltd.
Date(s) of Assessment Activities (dd/mm/yyyy – dd/mm/yyyy)	Document review: May 2023 Site visit: 5-7 June 2023
Assessment Period	1 January – 31 December 2022
Summary of the Assessment Methodology	<p>Corporate Integrity applied the International Standard on Assurance ISEA3000 (revised) – Assurance Engagements other than Audits & Reviews of Historical Financial Information’ issued by the International Auditing and Assurance Standards Board (IAASB).</p> <p>The work was carried out in accordance with Corporate Integrity Ltd.’s assurance procedures, designed to undertake an evidence-based assessment to provide reasonable assurance. Assessment activities were risk based with focus on material issues and included:</p> <ol style="list-style-type: none"> 1. Reviews of processes in place to identify and prioritise ESG risks and opportunities during the reporting period. 2. Reviews of the policies, systems and approaches that Aurubis is using to manage these risks and opportunities. 3. The collection and assimilation of performance information; and 4. Internal and external stakeholder interviews.

	<p>Number of permanent workers: 682</p> <p>Number of contractors: 19</p>
Summary of the Assessment Activities	<p>Pre-arrival (desktop)</p> <ul style="list-style-type: none"> • Desk Review of all submitted documents plus clarification discussions with Aurubis team. <p>Day 1</p> <ul style="list-style-type: none"> • Opening meeting • Plant tour <p>Day 2</p> <ul style="list-style-type: none"> • Review of evidence related to legal compliance and business integrity. • Review of evidence related to business relationships. • Review of evidence related to community health and safety, community development, stakeholder engagement, and cultural heritage. • Review of evidence related to human resources and human rights. • Review of evidence related to GHG emissions, freshwater management, biodiversity, waste management, and pollution. • Review of evidence related to transparency and disclosure. <p>Day 3</p> <ul style="list-style-type: none"> • Interviews with external stakeholders • Interviews with union representatives • Interviews with workers (employees and contractors) • Close out meeting

Summary of Findings

Criterion	Rating	Comments
1. Legal Compliance	Fully meets	Much of the sustainability management in Aurubis NV is driven by legal compliance under a heavily regulated Belgian and European legal framework. The site has a system in place designed to ensure legal compliance. This is documented in the Compliance Policy and Compliance Management System. The management system is resourced at corporate office and throughout the operations by designated personnel responsible for legal compliance, including a dedicated team to monitor

		<p>current and future European Union regulation. There is an annual report to the Board on legal compliance, complemented in some cases by legal compliance audits.</p> <p>Aurubis Olen is classified as a major accident Seveso site (due to quantity of sulphuric acid on the site) and as such is subject to a range of legal obligations, which are closely monitored and audited by the Belgian central government, and a full report is produced annually.</p> <p>Regulatory limit exceedances are identified through regular monitored and reported as required.</p> <p>This was confirmed through interviews with management; and a review of documents including the compliance policy, relevant job descriptions, and the annual report.</p>
<p>2. Business Integrity</p>	<p>Fully meets</p>	<p>Aurubis Olen has policies and systems in place to support business integrity that are overseen by dedicated Local Compliance Representatives. The systems are complemented with training and an anonymous whistle-blowing hotline. In 2022, there were no complaints related to business integrity.</p> <p>This was confirmed through interviews with management; and a review of documents including the code of conduct, business partner code of conduct, compliance anti-corruption policy, antitrust policy, and training records.</p>
<p>3. Stakeholder Engagement</p>	<p>Fully meets</p>	<p>Aurubis Olen carries out stakeholder mapping, engagement, and communications. The main stakeholders including local communities, local regional and national government bodies, and sector organisations.</p> <p>External stakeholder interviews indicated that Aurubis engages appropriately with local organizations and is generally responsive and supportive of local needs. The formal grievance process is run by an independent ombudsman and managed by Aurubis corporate. It is available here, and aligns with the UNGP effectiveness criteria. Two grievances regarding noise complaints were received and addressed in 2022.</p> <p>While one stakeholder reported not being aware of the formal grievance process, communication is open, and issues of concern have been addressed.</p> <p>This is confirmed through interviews with management; interviews with external stakeholders</p>

		<p>from the community and local government; and a review of documents including the compliance policy, whistleblower hotline, and sampled grievances.</p>
4. Business Relationships	Fully meets	<p>There is a corporate run program to screen suppliers and contractors before onboarding.</p> <p>The Corporate Compliance department is responsible for the implementation of the screening process, with significant input from the sustainability team and oversight by the Board in cases of high risk and critical business partners. When additional due diligence is required, it is carried about by specialist departments.</p> <p>It is noted that at Aurubis Olen this process is limited to business partners with a certain threshold of contract value, though it is in the process of being rolled out to suppliers under that value. The contracts under the threshold are still subject to assessments and ongoing evaluation.</p> <p>Once onboarded, suppliers and contractors are subject to contract clauses requiring business partners to comply with Aurubis Policies including the Business Partner Code of Conduct, which includes ESG requirements. Site management is responsible for day-to-day management of contractors, who are subject to self-assessments, scoring systems, and annual audits.</p>
5. Child Labor	Fully meets	<p>Child labor policies are included in the Code of Conduct and the Business Partner Code of Conduct, both of which also include commitments to ILO labor standards.</p> <p>Olen has procedures in place to verify age. No children were identified during the site walkthrough.</p> <p>The site has a student training program in place, which includes 17-year-olds. Appropriate controls are in place for the young workers to prohibit work in hazardous areas of the plant.</p> <p>This was confirmed through interviews with management; site observations; and a review of documents including the code of conduct, human rights commitment, and selected employee files.</p>
6. Forced Labor	Fully meets	<p>Forced labor policies are included in the Code of Conduct and the Business Partner Code of Conduct, as well as a formal commitment to integrate the UN Guiding Principles into working conditions, recruitment, communications, leadership and business partners. It includes a section on reporting</p>

		<p>and on how to report grievances. At the corporate level, Aurubis publishes in accordance with the UK Modern Slavery Act.</p> <p>At Aurubis Olen, these commitments are primarily implemented through a training course that includes content on forced labor and is currently being rolled out.</p> <p>This was confirmed through interviews with management; site observations; and a review of documents including the code of conduct, human rights commitment, and the business partner code of conduct, applicable to contractors and suppliers.</p>
<p>7. Freedom of Association and Collective Bargaining</p>	<p>Fully meets</p>	<p>The right to freedom of association and the right to collective bargaining are required by policy in the Code of Conduct and the Business Partner Code of Conduct and are in line with Belgian law. All workers at Aurubis Olen are represented by one of four unions and a Works Council, members of which are elected by the workforce every 4 years. They are also covered by a national sector Collective Labour Agreement (CLA) addressing remuneration, working hours, and rights and duties.</p> <p>Union representatives regularly meet with workers and management. Works council meetings are monthly.</p> <p>Interviews with union representatives, works councils' members and members of the workforce confirmed that the Works Councils are active, and there are good and open relationships, and while suggestions are addressed by management, it is not always as fast as desired. This is noted as an opportunity for improvement.</p> <p>This was confirmed through interviews with management; interviews with union representatives and works council members; interviews with workers; and a review of documents including the CLA, communications records, KPIs, and the human rights commitment.</p>
<p>8. Discrimination</p>	<p>Fully meets</p>	<p>Discrimination and harassment policies are included in the Code of Conduct and the Business Partner Code of Conduct, as well as a formal commitment to integrate the UN Guiding Principles into working conditions, recruitment, communications, leadership and business partners.</p> <p>At Aurubis Olen, these commitments are primarily implemented through a training course that includes</p>

		<p>content on discrimination and is currently being rolled out.</p> <p>Workers indicated a generally harmonious and non-discriminatory working environment. No grievances related to discrimination or harassment were received in the assessment period.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the code of conduct, human rights commitment, internal communications, and training materials.</p>
9. Gender Equality	Fully meets	<p>A gender equality requirement is included in the Code of Conduct as well as a formal commitment to integrate the UN Guiding Principles into working conditions, recruitment, communications, leadership and business partners.</p> <p>At Aurubis Olen, these commitments are primarily implemented through a training course that includes content on gender and is currently being rolled out.</p> <p>There is a women empowerment initiative, Women4Metals, of which the focus is to make women more visible in the metal industry and attract more women into the industry.</p> <p>The CLA does not differentiate wages, merit, and defined grades between genders. There are certain process areas where Aurubis Olen do not employ pregnant women due to potential risks associated with lead and heat levels, but appropriate rotation and mitigation steps are in place. A breakdown of women workers by department was seen and for the whole operation women constitute 12% of the workforce.</p> <p>Women interviewed on the Olen site indicated that they were comfortable with working conditions and did not experience specific gender related bias.</p> <p>This was confirmed through interviews with management; interviews with workers, including women; and a review of documents including the CLA, sustainability KPI update, human rights commitment, and maternity protection risk analysis.</p>
10. Working Hours	Fully meets	<p>Policy wording on working hours is included in the Code of Conduct and the Business Partners Code of Conduct in line with Belgian law and the collective bargaining agreements in place. Workers work in 5-day shifts, not to exceed an average of 38 hours</p>

		<p>weekly in a year. Overtime is limited to a certain number of hours and is voluntary.</p> <p>Hours are monitored through a time management system that also provides reports. Interviews with workers confirmed the adherence to working hour limits.</p> <p>This was confirmed through interviews with management; interviews with union representatives; interviews with workers; and a review of documents including the code of conduct, summary reports on attendance, and communications on working hours.</p>
11. Remuneration	Fully meets	<p>Policy wording on remuneration is included in the Code of Conduct and the Business Partners Code of Conduct.</p> <p>Minimum wage and pay scales are defined in the sector CLA. According to a government web site calculating living wage, the “living wage” levels are below the minimum wage. Aurubis corporate further benchmarks wages against the metals sector, and demonstrates they are paying within the 75-90% range.</p> <p>This was confirmed through interviews with management; interviews with workers; and a review of documents including the minimum wage comparison report, workers’ wages, and sustainability KPI updates.</p>
12. Occupational Health and Safety	Fully meets	<p>The assessment confirmed Aurubis Olen has a valid ISO 45001 certificate.</p>
13. Grievance Mechanism	Fully meets	<p>Aurubis corporate has a formal grievance line – a whistleblowing line available for internal and external stakeholders – aligned with the UN Guiding Principles effectiveness criteria. The whistleblowing line is run by an independent ombudsman and is available to all stakeholders.</p> <p>This is complemented by an anonymous internally available support hotline that is managed through an external organization and is available 24/7.</p> <p>Workers can also raise concerns with conversations with line managers, human resources, or through the Works Councils.</p> <p>At corporate level, management recognized a need to strengthen the culture of feedback and has begun to do so by setting a target of receiving “pulse checks” from workers on feedback processes, which has not yet been rolled out at Aurubis Olen.</p>

14. Environmental Risk Management	Fully meets	The assessment confirmed Aurubis Olen has a valid ISO 14001 certificate.
15. Greenhouse Gas (GHG) Emissions*	Fully meets	<p>At the corporate level, Aurubis reports Greenhouse Gas Emissions through the Carbon Disclosure Project. Emissions are reported using the GHG Protocol and third-party audited in accordance with the European Emissions Trading Scheme.</p> <p>Aurubis corporate, has made a commitment to 50% reduction of Scope 1 & 2 emissions and 24% reduction of Scope 3 emissions by 2030 based on a 2018 baseline. These targets are validated by the Science Based Targets Initiative (SBTi). Aurubis is also a signatory to the Business Ambition for 1.5°C.</p> <p>Commitments are supported by a decarbonization roadmap and specific projects such as renewable energy initiatives at site.</p> <p>More information is available here.</p> <p>This was confirmed through interviews with management; and a review of documents including</p>
16. Energy Consumption	Fully meets	The assessment confirmed Aurubis Olen has a valid ISO 14001 certificate covering this criterion.
17. Freshwater Management and Conservation	Fully meets	<p>Aurubis Olen has a water management system covered by ISO 14001-2015. Water supply risks are low as Aurubis Olen is not in a water constrained area. Water is drawn from a well and all process and surface water runoff is part of a closed drain system that goes to a water treatment plant before discharge into the river. Storage ponds are available for excess water in event of a storm or fire water run-ff in case of a fire.</p> <p>Regulatory limit exceedances are identified through monitoring programmes and are reported to the authorities. During 2022 there were three exceedances in water quality discharges, all of which were reported and no action or fine was required from the authorities.</p> <p>This was confirmed through interviews with management; site observations; and a review of documents including the water management procedure, code of conduct, and environmental policy declaration.</p>
18. Waste Management	Fully meets	The assessment confirmed Aurubis Olen has a valid ISO 14001 certificate covering this criterion.

19. Tailings Management	Not applicable	Not applicable to non-mining operations.
20. Pollution	Fully meets	<p>The assessment confirmed Aurubis Olen has a valid ISO 14001 certificate covering this criterion.</p> <p>Emissions are regulated through Belgian law and limits are set and monitored. This site is subject to higher scrutiny as it is a Seveso site and is visited regularly by the regulators. Environmental inspections are carried out by the Flanders regional government. Non non-compliances were reported in 2022.</p> <p>Noise and dust remain the main areas of concern regarding impacts on the surrounding community, and there are initiatives in place to limit these.</p> <p>This was confirmed through interviews with management; interviews with stakeholders; and a review of documents including the environmental policy, the ISO 14001 certification, and the corporate-level environmental policy.</p>
21. Biodiversity and Protected Areas	Fully meets	<p>Aurubis Olen has not identified biodiversity as an adverse impact in any EIA or as an aspect in the environmental management of the site but would be under the scope of ISO14001 if required. The land take footprint of the site has not changed for decades, and surrounding areas are urban and rural farming with no identified areas of special biological interest.</p> <p>This was confirmed through interviews with management; and a review of documents including the corporate policy on environmental protection, the ISO 14001 certification, and the Aurubis non-financial report.</p>
22. Mine Closure and Reclamation	Not applicable	Not applicable to non-mining operations.
23. Community Health and Safety	Fully meets	<p>Aurubis Olen’s systematically manages community health and safety, having identified atmospheric emissions and noise pollution as the two highest risks. Emission levels are tightly regulated with compliance levels set to protect public health. There are no incidents of exceedance in 2022.</p> <p>As the site is a Seveso site, there is a potential risk to the public in the event of a major accident. To manage this, there are ongoing risk evaluations and scrutiny including inspection by regulators. Emergency response arrangements, commensurate with the risk, are in place. Emergency exercises are</p>

		<p>conducted monthly with the local fire departments, with a major exercise once per year including external services and stakeholders.</p> <p>This was confirmed through interviews with management; interviews with local stakeholders including community members, government, and the fire department; and a review of documents including the ISO 45001 certification report, communication plan, and occupational health and safety plan.</p>
24. Community Development	Fully meets	<p>Aurubis Olen has a Good Neighbor policy supported by engagement with a range of stakeholders including local residents, members of civil society, and local educational establishments. The nearest community is the adjacent housing and there are regular meetings with the residents.</p> <p>Aurubis Olen engages in various community projects including knowledge building in local schools, internships, and social support for vulnerable families in the neighborhood.</p> <p>Interviews with stakeholders indicate a positive relationship and responsiveness to comments and requests.</p> <p>This was confirmed through interviews with management; interviews with stakeholders from the community; and a review of documents including the projects list, sponsorships, the corporate sponsoring policy, and Aurubis sustainability KPIs.</p>
25. Artisanal and Small-Scale Mining	Not applicable	<p>The site assessment confirmed there is no ASM in the area of influence.</p>
26. Human Rights	Fully meets	<p>At corporate level, Aurubis has publicly committed to following the UN Guiding Principles and the UN Global Compact. The requirements are reflected in the Code of Conduct and Business Partner Code of Conduct, with specific language relating to human rights in the workplace and in the supply chain.</p> <p>There is evidence that management arrangements exist for control of specific human rights issues in the workplace and that due diligence is carried in the supply chain.</p> <p>No human rights related grievances were received during the assessment period.</p> <p>This was confirmed through interviews with management; and a review of documents including the business partner code of conduct, human rights commitment and Aurubis non-financial report.</p>

27. Security and Human Rights	Not applicable	Not applicable to non-mining operations.
28. Indigenous Peoples' Rights	Not applicable	The site assessment confirmed there are no indigenous peoples in the area of influence.
29. Land Acquisition and Resettlement	Not applicable	The site assessment confirmed there is no land acquisition and resettlement current or planned.
30. Cultural Heritage	Not applicable	The site assessment confirmed there is no cultural heritage in the area of influence.
31. Due Diligence in Mineral Supply Chains	Fully meets	<p>As of the follow up assessment of 15 June 2023 conducted by RCS, this criterion is fully meets in accordance with the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc.</p> <p>Olen has a complex supply chain with hundreds of suppliers covering thousands of transactions of both mined and recycled material per year.</p> <p>Due diligence in mineral supply chains is handled primarily at corporate headquarters.</p>
	31.a. Management System	<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>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 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>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>

			Red flags related to country of origin have been identified.
	31.c. Risk Assessment Process	Fully meets	<p>As of the follow up assessment of 15 June 2023, this criterion is fully meets. There is an established process to conduct risk assessments with credible information and identify annex II risks in the supply chain.</p> <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.</p> <p>There is ongoing monitoring through subscriptions, engagement with different schemes, regular updates of supplier information, on-the-ground assessments, regular communications with suppliers, 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>

<p>32. Transparency and Disclosure</p>	<p>Fully meets</p>	<p>Olen operations ESG performance are reported in:</p> <p>Sustainability report (published every two years latest was 2019/20)</p> <p>The Annual Report (annual) (including a non-financial sustainability section, the non-financial report, according to the German Commercial Code (HGB)</p> <p>The Environmental report (annual)</p> <p>EMAS statement (annual)</p> <p>Reporting is based on the internationally recognized standards of the Global Reporting Initiative (GRI) and the Sustainability Report includes a GRI KPI summary). Read more here and here.</p>
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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 21 July 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 improvement to fully meet all applicable Copper Mark Criteria by 21 July 2024.	<input type="checkbox"/>
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 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	25 September 2023
Expiry Date of the Copper Mark	24 September 2026