



Building a better  
working world

Ernst & Young  
8 Exhibition Street  
Melbourne VIC 3000 Australia  
GPO Box 67 Melbourne VIC 3001

Tel: +61 3 9288 8000  
Fax: +61 3 8650 7777  
ey.com/au

## Independent Reasonable Assurance Report to the directors and management of BHP Group Limited, and the directors and management of Minera Escondida Limitada

### Our Opinion

In our opinion, the assertions made by management that Minera Escondida Limitada (Minera Escondida) fully met all applicable criteria in the Minera Escondida Copper Mark Self-Assessment completed for the year ended 30 June 2024 (referred to as 'the Self-Assessment') are presented in accordance with the Copper Mark Criteria (as defined below), and are fairly stated, in all material respects.

### What our engagement covered

Ernst & Young (EY) was engaged by BHP Group Limited (BHP) to undertake reasonable assurance as defined by International Auditing Standards, hereafter referred to as 'the engagement', over the assertions made in Minera Escondida's Self-Assessment against the Copper Mark Criteria. Refer to *Appendix A* for an extract of the Self-Assessment with EY observations and additional information as requested by the Copper Mark.

### Criteria

In preparing the Self-Assessment, Minera Escondida has applied the requirements of the Copper Mark Criteria Guide<sup>1</sup> (Criteria). Such Criteria were specifically designed to assist the Copper Mark in assessing management's Copper Mark Self-Assessment. As a result, the Criteria may not be suitable for another purpose.

### Key responsibilities

#### EY's responsibility and independence

Our responsibility was to express a reasonable assurance conclusion on the disclosures made in the Self-Assessment against the Criteria.

We were also responsible for maintaining our independence and confirm that we have met the requirements of the *APES 110 Code of Ethics for Professional Accountants* including independence, and have the required competencies and experience to conduct the engagement.

#### BHP's responsibility

BHP's management was responsible for selecting the Criteria and Minera Escondida's management was responsible for preparing and fairly presenting information presented in the Self-Assessment in accordance with the Criteria. This responsibility includes establishing and maintaining internal controls, maintaining adequate records, and making estimates that are reasonable in the circumstances.

### Our approach to conducting the engagement

We conducted the engagement in accordance with the *International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* (ISAE 3000) and the terms of reference for the engagement as agreed with BHP on 19 February 2024.

The procedures we performed were based on our professional judgement and included, but were not limited to, the following:

- ▶ Reviewing referenced documents and policies
- ▶ Conducting in-person and virtual interviews with Minera Escondida's management and workers
- ▶ Conducting in-person interviews with members of the local communities

- ▶ Conducting on-site inquiries and observations
- ▶ Reviewing the applicability of the Criteria for Minera Escondida
- ▶ Checking the accuracy and completeness of the evaluated Criteria
- ▶ Reviewing the information disclosed in the Self-Assessment to confirm consistency with our understanding and knowledge of Minera Escondida's management approach.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our reasonable assurance conclusion.

### Other Matters

This assurance report does not extend to any disclosures or assertions made by Minera Escondida relating to future performance plans and/or strategies disclosed in the Self-Assessment.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, the engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

### Use of our Assurance Report

This assurance report is intended solely for the information and use of the directors and management of each of BHP and Minera Escondida, and of The Copper Mark related to The Copper Mark's accreditation process and is not intended to be and should not be used by anyone other than those specified parties.

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than the directors and management of each of BHP and Minera Escondida and The Copper Mark, or for any purpose other than that for which it was prepared.

Our assurance included web-based information that was available via web links as of the date of this conclusion. We provide no assurance over changes to the content of this web-based information after the date of this assurance report.

Ernst & Young  
Melbourne, Australia

31 October 2024

Meg Fricke  
Partner

<sup>1</sup> Copper Mark Criteria: [https://coppermark.org/wp-content/uploads/2020/08/Copper-Mark-Criteria-Guide\\_FINAL\\_24FEB20.pdf](https://coppermark.org/wp-content/uploads/2020/08/Copper-Mark-Criteria-Guide_FINAL_24FEB20.pdf)

## Appendix A: Additional Information as requested by the Copper Mark

This appendix includes additional information as requested by the Copper Mark and a table outlining Minera Escondida's rating and EY's observations against each Criterion. Each Criterion is rated as either:

- ▶ Does Not Meet: Site currently has no formal system in place, documentation, or a member of staff with responsibility to understand, monitor and ensure conformance with the industry norm for this issue area.
- ▶ Partially Meets: Site has begun development of a management system or process to ensure conformance with the industry norm for this issue area, but implementation has not started or is incomplete.
- ▶ Fully Meets: Site has in place a documented management system or process that effectively ensures full conformance with the industry norm for this issue area.
- ▶ Not Applicable ('N/A'): This Criterion is not relevant to Minera Escondida's operations.

The final column in the table below presents observations from EY's reasonable assurance procedures, as outlined in the assurance report, pertaining to each criterion. The observations listed are within the context of our assurance of the Self-Assessment as a whole and contribute to forming our conclusion on it. We do not provide separate conclusions on these individual observations.

### Site Information

Name of company	Minera Escondida Limitada ('the Company')
Name of site	Escondida
Address	Av. De la Minería, Antofagasta, (the site is located in the Atacama Desert)
Country of operation	Chile
Metals produced on site	Copper, with by-products including molybdenum, gold, silver
Metals included in scope	Copper
Metals covered by other independent assessments for Criterion 31	NA
Types of operations included in scope:	
Mining	<input checked="" type="checkbox"/>
Concentrate blending	<input checked="" type="checkbox"/>
Solvent extraction and electrowinning	<input checked="" type="checkbox"/>
Smelting	<input type="checkbox"/>
Refining	<input type="checkbox"/>
Other (please explain)	
Infrastructure owned or controlled by the site and included in scope	
Roads	<input checked="" type="checkbox"/>
Rails	<input type="checkbox"/>
Ports	<input checked="" type="checkbox"/>
Other (please explain)	<p>Minera Escondida Limitada is a copper mining company operated by BHP, located 170 km southeast of the city of Antofagasta, at an altitude 3,100 meters above sea level.</p> <p>Its corporate objective is to create long-term value for its shareholders through the discovery, acquisition, development, and commercialization of natural resources. Minera Escondida's total FY23 production was 1,055 kt, of which 222 kt was Copper Cathodes and 833 kt Copper Concentrate.</p> <p>The current infrastructure on site consists mainly of crushing and ore transportation, three concentrator plants, two leaching plants, two solvent extraction and electrowinning plants, as well as two pipelines that transport the concentrates to the facilities in Puerto Coloso, where the materials are subsequently transported to customers.</p>

Other (please explain) (continued)

In Puerto Coloso, there are two desalinization plants used to produce water, which is pumped to the mine and used in the industrial process.

BHP has a set of global documents that set out minimum mandatory performance requirements that are relevant evidence for the 32 criteria. These documents are applicable for everyone who works at BHP

#### Independent Site Assessment Information

Name of the Lead Assessor

Meg Fricke, Luke Kitchen, Nicolas Calderon, Tamara Contreras and Rominna Gaete.

Name of the Assessment firm

EY

Date(s) of assessment activities (dd/mm/yyyy – dd/mm/yyyy)

22 April 2024 – 25 April 2024

Assessment period

1 July 2023 – 30 June 2024

Summary of the Assessment Methodology

EY developed a reasonable assurance methodology specific to Copper Mark, in accordance with the *International Standard on Assurance Engagements 3000 Assurance Engagements Other Than Audits or Reviews of Historical financial Information* (ISAE 3000). This methodology comprised:

##### 1. Planning and Assurance Strategy

- ▶ Kick-off meeting with BHP (Escondida) management
- ▶ Assessment of performance expectations against Copper Mark criteria, including commitment to Copper Mark
- ▶ Risk assessment tailored to Escondida's operational context and specific Copper Mark criteria
- ▶ Development of procedures and approaches for the review execution.

##### 2. Execution

- ▶ Examination of documentation, including policies, procedures, data, and other relevant evidence
- ▶ Virtual meetings with Escondida professionals to understand existing processes and activities related to Copper Mark's performance expectations
- ▶ Site visit to Escondida, including interviews with workers and local stakeholders
- ▶ Comparison of Escondida's Self-Assessment results with Copper Mark criteria, evidence collected, and insights from interviews and site visits
- ▶ Discussions on rating differences, supporting documentation, identified gaps, and plans for gap resolution.

##### 3. Conclusion

- ▶ Executive review of Self-Assessments
- ▶ Preparation of the Detailed Report
- ▶ Preparation of the reasonable assurance statement
- ▶ Final review meeting with Escondida management to validate ratings, gaps identified, and plans for addressing them
- ▶ Finalization of the Detailed Report.

##### Assessment Timeline:

- ▶ Kick-off meeting: March 6, 2024
- ▶ Risk assessment: March 6-8, 2024
- ▶ Document verification and interviews: March 11 to April 12, 2024
- ▶ On-site verification: April 22-25, 2024

#### Summary of the Assessment Activities

We base our assurance conclusion on ISAE 3000 This Standard requires us to plan and execute procedures to obtain reasonable assurance regarding whether the selected indicators are free from material misstatement.

A reasonable assurance conclusion under ISAE 3000 involves conducting procedures to gather evidence on the measurement of the selected indicators and related disclosures in the Report. The nature, timing, and scope of these procedures depend on the auditor's professional judgment, including the assessment of risks related to material misstatement of the selected indicators, whether due to fraud or error.

The assessment activities included:

- ▶ Reviewing referenced documents and policies
- ▶ Conducting in-person and virtual interviews with Escondida management (21 virtual meetings and 2 in-person meeting)
- ▶ Conducting in-person and virtual interviews with 64 Escondida employees
- ▶ Conducting in-person interviews and focus group with 53 members of the local communities
- ▶ Conducting on-site inquiries and observations
- ▶ Conducting in-person interviews with 13 suppliers
- ▶ Reviewing the applicability of the Copper Mark criteria for Escondida
- ▶ Checking the accuracy and completeness of the evaluated criteria
- ▶ Reviewing the information disclosed in the Self-Assessment to confirm consistency with our understanding and knowledge of Escondida's management approach.

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
1	Legal Compliance	To implement a management system that ensures compliance with all national legal requirements, including national obligations under international law.	Fully Meets	<p>Minera Escondida has a management system for legal compliance that integrates environmental management and climate change considerations, designed to ensure adherence to national and international legal requirements. A matrix of legal requirements, encompassing environmental, operational, and administrative obligations, is regularly maintained and reviewed monthly for regulatory updates. Area leaders are tasked with reporting changes and providing evidence of compliance. The company also provides employee training on legal compliance.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Third-party audits</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures and registers</li> </ul> <p>Employee and contractor interviews confirmed awareness of applicable laws and regulations related to their roles. They mentioned receiving periodic training on these matters and noted that information is regularly disseminated through various channels, including videos and posters.</p> <p>During site visits, observations identified information on legal compliance displayed through posters, bulletins, and videos in areas such as the dining hall and human resources offices. A walkthrough of monitoring and controlling legal compliance requirements via the EMAS platform was also conducted.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
2	Business Integrity	To implement a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.	Fully Meets	<p>Minera Escondida has a management system that prohibits bribery, corruption, and anti-competitive behavior. This system aligns with BHP's Code of Conduct and a crime prevention manual that applies to all employees and contractors. The management system includes annual risk assessments and controls designed to prevent facilitation payments, particularly for high-risk positions, as well as continuous monitoring and monthly BHP Compliance. Multiple channels, including a hotline, website, and BHP's 24-hour confidential reporting tool for reporting misconduct are available for reporting bribery and corruption. Mandatory training is provided for all employees and applicable contractors.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures and registers</li> <li>- Training packages</li> <li>- Relevant reports</li> <li>- Site operating permits and other legal documents</li> </ul> <p>Management interviews and site observations provided insights into the understanding of legal compliance, management practices, and training procedures. Employees and contractors demonstrated knowledge of relevant laws and regulations, supported by regular training and communication.</p> <p>The Compliance Manager for Chile oversees compliance, reporting to the BHP Chief Compliance Officer who maintains a reporting line to the Chief Legal, Governance and External Affairs Officer, reports quarterly to the Risk and Audit Committee of the BHP Board and meets at least annually with the Committee Chair.</p> <p>Employees and contractor interviews discussed the dissemination of information through videos, posters, and other means. Mandatory training is provided for all employees and applicable contractors on the Code of Conduct, supplemented by additional risk-based anti-corruption and competition law training to relevant employees.</p> <p>During site visits, observations identified the display and communication of key policies and systems including BHP's 24-hour confidential reporting tool and the BHP Code of Conduct.</p>
3	Stakeholder Engagement	To carry out stakeholder mapping, and to implement an engagement plan, and to establish a grievance mechanism.	Fully Meets	<p>Minera Escondida has developed a stakeholder identification map that is regularly updated. A Community Engagement Plan has been established, encompassing relationship objectives, identification of areas of interest, areas of influence, and engagement strategies.</p> <p>To monitor compliance with the plan, monthly reports are generated detailing the key activities completed.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>A procedure for addressing community concerns, complaints, and claims has been developed in accordance with the effectiveness criteria of the United Nations Guiding Principles) on Business and Human Rights (UNGPs) and the ICMM Guide to the Management and Resolution of Concerns and Complaints at the Local Level. According to this procedure, available channels for addressing concerns include WhatsApp, email, direct engagement with a local community representative, or through a representative of a contractor company or business partner.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Third-party audits</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports</li> <li>- Site operating permits and other legal documents</li> </ul> <p>Management interviews confirmed that the stakeholder database is regularly updated whenever new stakeholders are identified, such as new authorities or Neighborhood Council formations. Discussions during the interviews focused on the stakeholder map management process and gathering information about community needs, as well as the complaints mechanism.</p> <p>Interviews with the Coloso communities highlighted a consistent, face-to-face relationship with Minera Escondida's community team. It was confirmed that Minera Escondida promptly responds to queries and needs from community members. Interviewees indicated they were aware of where to submit queries, complaints, or claims when necessary. They also confirmed receiving written responses from Minera Escondida within appropriate timeframes for their submitted complaints.</p>
4	Business Partners	To promote responsible business practices with significant business partners, including suppliers.	Fully Meets	<p>Minera Escondida promotes responsible business practices among its business partners through alignment programs such as the Green Pathway Program, formalized in its Code of Conduct policies and procedures. The company conducts rigorous supplier evaluation and selection processes that prioritize responsible business practices. Contracts with business partners are monitored for compliance with these practices.</p> <p>Systematic controls and background checks are implemented to assess risks in business relationships. Minera Escondida also provides ESG (Environmental, Social, and Governance) training specifically tailored for its business partners. Additionally, BHP's 24-hour confidential reporting tool is available to business partners.</p> <p>Minera Escondida's approach includes fostering local commerce and backing indigenous community suppliers. The company's Green Pathway Program</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>reflects its commitment to steering business partners towards sustainable practices. Rigorous risk assessments are conducted through systematic controls and background checks in business relationships. BHP's 24-hour confidential reporting tool the reporting line is available to report for incidents.</p> <p>Training is provided to ensure personnel are well-informed, with a Procurement partner at Escondida overseeing contract compliance, aided by a global supply team present on-site.</p> <p>Minera Escondida has a remuneration management system that assigns remuneration based on the level of responsibility, location, market comparators, individual ability, relevant experience, and performance.</p> <p>Salary studies in the national mining sector are regularly carried out by a consulting firm. These studies inform updates to collective agreements that account for the readjustment of salaries.</p>
5	Child Labor	To implement a management system that prevents 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 ILO Conventions No. 138 and No. 182.	Fully Meets	<p>Minera Escondida operates under BHP's Human Rights Policy Statement that demonstrates BHP's commitment to take steps to operate in a manner consistent with the terms of the ILO Declaration on Fundamental Principles and Rights at Work, including the four Core Labour Standards the subject of the ILO Conventions upon which the Declaration is based, including concerning the effective abolition of child labour.</p> <p>Internal requirements specify the documentation employees must provide before commencing duties and stipulate that individuals must be at least 18 years old, unless under an apprenticeship contract.</p> <p>BHP adheres to a Supply Global Standard which mandates that suppliers must meet specific requirements, including prohibiting the employment of children who have not completed their mandatory education (as defined by local legislation) and setting a minimum age of 15 years for employment.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews detailed Minera Escondida's compliance with the BHP Human Rights Policy Statement, which prohibits child labor. They discussed recruitment, selection, and contracting procedures designed to ensure that all employees meet the minimum age requirement. Managers also highlighted systemic barriers in place to prevent minors from entering the site. Minimum requirements for service providers were emphasized, including the prohibition</p>



Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>of hiring children who have not completed mandatory education.</p> <p>Employees, contractors, union representatives, and groups of female employees interviewed affirmed the absence of child labor. They indicated awareness of the Corporate Policy, Code of Conduct, and Internal Regulations, accessible through BHP's employee website, HR+.</p> <p>During the site visit no instances of child labor were observed.</p>
6	Forced Labor	To implement a management system that prevents 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.	Fully Meets	<p>Minera Escondida operates under BHP's Human Rights Policy Statement that demonstrates BHP's commitment to take steps to operate in a manner consistent with the terms of the ILO Declaration on Fundamental Principles and Rights at Work, including the four Core Labour Standards the subject of the ILO Conventions upon which the Declaration is based, including concerning eliminating all forms of forced or compulsory labor (including slavery or slavery like practices, various forms of debt bondage, and human trafficking</p> <p>BHP utilizes a Risk Assessment process to evaluate the risk of forced labor within its operations and supply chain. Contracts include specific clauses aimed at preventing modern slavery and forced labor.</p> <p>BHP adheres to a Supply Global Standard which outlines various requirements, including the prohibition of forced labor.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida is subject to the BHP Human Rights Policy Statement, which prohibits forced labor. They also mentioned the existence of controls over contractor companies to ensure compliance with this policy through document verification. Additionally, employees receive annual training that covers this topic.</p> <p>During interviews with employees and contractors, it was affirmed that there have been no instances of forced labor experienced. They stated awareness of the Human Rights Policy Statement, which prohibits forced labor, and acknowledged receiving training in the BHP Code of Conduct, which also addresses this issue.</p> <p>During site visit no instances of forced labor were observed.</p>



Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
7	Freedom of Association and Collective Bargaining	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	Fully Meets	<p>Minera Escondida maintains a management system designed to ensure that the rights of its employees to unionize and engage in collective bargaining are in line with ILO Conventions No. 87 and No. 98. BHP's Human Rights Policy Statement includes a commitment to take steps to operate in a manner consistent with the terms of the ILO Declaration on Fundamental Principles and Rights at Work, including the four Core Labour Standards the subject of the ILO Conventions upon which the Declaration is based, including concerning freedom of association and the effective recognition of the right to collective bargaining.</p> <p>Minera Escondida actively engages in collective bargaining processes and facilitates conditions for unionized employees to meet. Additionally, the company provides training and awareness programs to inform employees about their rights in this regard.</p> <p>BHP adheres to a Supply Global Standard which includes various requirements, including the respect for freedom of association.</p> <p>For BHP's global complaints mechanism, you can refer to the following link:  <a href="https://secure.ethicspoint.com/domain/media/en/gui/23435/index.html">https://secure.ethicspoint.com/domain/media/en/gui/23435/index.html</a></p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida is subject to the BHP Human Rights Policy Statement, which supports freedom of association and effective recognition of the right to collective bargaining. It was also noted that the BHP Code of Conduct prohibits discrimination based on union membership, and interviews emphasize a high rate of union participation among employees.</p> <p>Interviews with union representatives and members affirmed that Minera Escondida allows its employees the freedom to join unions, organize, and engage in collective bargaining.</p>
8	Discrimination	To prevent and address all forms of harassment and discrimination in the workplace in line with ILO Conventions No.100 and No. 111.	Fully Meets	<p>Minera Escondida operates under BHP's Inclusion and Diversity Position Statement that includes goals and initiatives aimed at promoting gender equality in the workplace. Related initiatives include the Graduate Program and the Women Miners Program, both focused on supporting women. Additionally, mandatory training for employees is provided to eliminate harassing behaviors and foster an inclusive work environment.</p> <p>BHP conducts salary band analyses to ensure equal pay for men and women performing jobs of equal value. Minera Escondida has established reporting and grievance channels, along with clear procedures,</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>to address complaints raised by stakeholders, including those related to workplace and sexual harassment.</p> <p>Minera Escondida actively monitors indicators and implements actions to promote gender equality, with specific attention to the proportion of female staff within the workplace.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida is subject to the BHP Inclusion and Diversity Position Statement. They detailed various actions taken to promote gender equality, including goals set for female participation by 2025 and annual salary gap analyses conducted by the company.</p> <p>During interviews with employees and contractors, they demonstrated familiarity with the Inclusion and Diversity Position Statement and knowledge of the complaint and grievance channels available. They also affirmed receiving training on this topic. Female employees specifically stated they did not experience gender-based discrimination and felt they were in an environment offering equal opportunities.</p> <p>Site observations confirmed gender employment percentages across different work areas, showing a significant representation of female employees throughout the site.</p> <p>This comprehensive review underscores Minera Escondida's commitment to inclusion and gender equality in its operations.</p>
9	Gender Equality	To continually assess and monitor progress to ensure the implementation of a policy on gender equality in the workplace.	Fully Meets	<p>Minera Escondida operates under BHP's Inclusion and Diversity Position Statement that includes goals and initiatives aimed at promoting gender equality in the workplace. Related initiatives include the Graduate Program and the Women Miners Program, both focused on supporting women. Additionally, mandatory training for employees is provided to eliminate harassing behaviors and foster an inclusive work environment.</p> <p>BHP conducts salary band analyses to ensure equal pay for men and women performing jobs of equal value. Minera Escondida has established reporting and grievance channels, along with clear procedures, to address complaints raised by stakeholders, including those related to workplace and sexual harassment.</p> <p>Minera Escondida actively monitors indicators and implements actions to promote gender equality, with specific attention to the proportion of female staff within the workplace.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida is subject to the BHP Inclusion and Diversity Position Statement. They detailed various actions taken to promote gender equality, including goals set for female participation by 2025 and annual salary gap analyses conducted by the company.</p> <p>During interviews with employees and contractors, they demonstrated familiarity with the Inclusion and Diversity Position Statement and knowledge of the complaint and grievance channels available. They also affirmed receiving training on this topic. Female employees specifically stated they did not experience gender-based discrimination and felt they were in an environment offering equal opportunities.</p> <p>Site observations confirmed gender employment percentages across different work areas, showing a significant representation of female employees throughout the site.</p> <p>This comprehensive review underscores Minera Escondida's commitment to inclusion and gender equality in its operations.</p>
10	Working Hours	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.	Fully Meets	<p>Minera Escondida has a management system in place to control working hours. This system includes an Attendance Record that corroborates working hours and rest cycles, an Internal Regulation, and a contract format that details shifts and working hours. Additionally, there is BHP Supply Global Standard that mandates a commitment to respecting the agreed-upon working hours, in a supplier's workforce and Standard Supplier Contract Format which stipulates as a minimum requirement that working hours must not exceed national legal standards. The different work shift options are:</p> <ul style="list-style-type: none"> <li>i) 7 workdays (84 weekly working hours) and 7 rest days,</li> <li>ii) 4 workdays (45 weekly working hours) and 3 rest days.</li> </ul> <p>These work shifts apply to employees and to contractors. Work shifts are defined in compliance with the national law. The management system also ensures compliance with vacation policies.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> </ul>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>- Site operating permits and other legal documents</p> <p>Management interviews highlighted that the company uses authorized work shifts and has specific rules for allocating work hours and breaks due to the continuous nature of operations. Some employees work under Article 22 (national law), which allows exemptions from standard working hour limits, and the company has clear procedures for tracking work hours.</p> <p>Employee interviews confirmed that their work hours adhered to the limits established by their assigned shifts. They also indicated that they have the flexibility to schedule vacations, provided they coordinate with their respective work areas. Vacation entitlements, including available days, are accessible through the HR platform. Instances where employees are required to work additional hours are voluntary, agreed upon, and appropriately compensated by Minera Escondida.</p> <p>This structured approach ensures compliance with regulations while supporting employee welfare and operational efficiency at Minera Escondida.</p>
11	Remuneration	To pay wages that equal or exceed the national minimum wage, the appropriate industry wage (if higher), or a living wage.	Fully Meets	<p>Minera Escondida has a remuneration management system that assigns remuneration based on the level of responsibility, location, market comparators, individual ability, relevant experience, and performance.</p> <p>Salary studies in the national mining sector are regularly carried out by a consulting firm. These studies inform updates to collective agreements that account for the readjustment of salaries. Salaries studies cover the local minimum wage.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews provided insights into BHP's salary payment system and the measures taken to ensure salaries remain competitive within the industry. They also discussed the review process employed when adjustments to remuneration are necessary.</p> <p>Interviews with employees confirmed that they receive their salaries within the stipulated period. They can access their payment information through the HR+ website, where detailed and clear information is provided. In case of any inquiries or concerns, they are aware of whom to contact and the appropriate channels to use (phone number, email, or directly at the HR office).</p> <p>This structured approach ensures transparency and efficiency in salary management at Minera Escondida, fostering trust and clear communication between the company and its workforce.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
12	Occupational Health and Safety	To implement an occupational health and safety management system that is in line with internationally accepted best practice frameworks (e.g. OHSAS 18001 or ISO 45001)	Fully Meets	<p>Minera Escondida has implemented an internal occupational health and safety management system that aligns with the ISO 45001 Plan, Check, Do, Act approach. The system encompasses a Safety, Health, Environment, and Community Relations Policy, a series of procedures, a risk matrix, emergency drills, accident investigations, and other elements.</p> <p>Personal Protective Equipment (PPE) requirements are clearly displayed in work areas, and PPE is provided to employees.</p> <p>Minera Escondida maintains records of incident investigations it has conducted, as well as inspections carried out by governmental entities.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews underscored the significance of several key documents such as the Safety, Health, Environment, and Community Relations Policy, the Occupational Hygiene and Health Manual, Emergency Response Protocol, various procedures, and Global Standards, alongside discussions on conducted safety training.</p> <p>Employee and contractor interviews affirmed their familiarity with the Policy and procedures related to health and safety issues. They highlighted the regular drills and training sessions that prepare them for potential emergencies. Additionally, employees noted that Minera Escondida provides necessary PPE free of charge.</p> <p>During site visits, it was observed that facilities maintain high safety and hygiene standards. Emergency points are clearly identified in accessible locations, and there are visible signs and instructions for the proper use of PPE, which employees and contractors adhere to diligently.</p>
13	Employee Grievance Mechanism	To establish and implement a grievance mechanism accessible to all employees.	Fully Meets	<p>Minera Escondida has established and implemented a complaints submission mechanism in accordance with the United Nations Guiding Principles on Business and Human Rights accessible to all its employees. The company has a Complaints Policy and a Complaints and Investigation Procedure. Both documents outline the mechanism's scope, the methods for submitting complaints (through Human Resources, Labor Relations, BHP's 24-hour confidential reporting tool or to a leader), and the processes for receipt and investigation.</p> <p>Minera Escondida maintains records of complaints and claims, which are reported periodically to its board of directors.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>Employees have received training on the reporting channels, and Minera Escondida actively disseminates and makes these channels available.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews provided insights into Minera Escondida's robust complaints mechanism. They highlighted the various channels available for reporting complaints, such as the 24-hour confidential reporting tool portal, direct reporting to leaders, Human Resources, or Labor Relations. The importance of documents like the BHP Whistleblowing Policy and Code of Conduct in guiding the reporting process and the obligation to raise concerns when discrepancies are observed were emphasized. Management also confirmed the existence of complaint records and explained the procedures involved in handling complaints. They underscored that employees have been trained on utilizing these mechanisms effectively.</p> <p>Employees and contractor interviews indicated familiarity with the process for making claims, emphasizing the accessibility of channels like the BHP 24-hour confidential reporting tool portal and QR codes on posters throughout the site. They acknowledged receiving training on how to utilize the complaint mechanism and understood the associated investigation procedures following the submission of complaints.</p> <p>During site visits, posters promoting the BHP 24-hour confidential reporting tool portal were prominently displayed in various locations. The Labor Relations team further elaborated on Minera Escondida's complaints mechanism and detailed the procedures involved in processing complaints effectively.</p>
14	Environmental Risk Management	To implement an environmental management system (EMS) functionally equivalent to an internationally recognized EMS standard (e.g. ISO 14001).	Fully Meets	Escondida demonstrates compliance through certification of its Environmental Management System (EMS) to the ISO 14001 standard.
15	Greenhouse Gas (GHG) Emissions	To quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting protocols (e.g., IPCC or GHG Protocol).	Fully Meets	<p>Minera Escondida adheres to BHP's corporate goal to achieve net zero operational greenhouse gas (GHG) emissions by 2050 and target for at least a 30% reduction in greenhouse gas emissions by FY2030, based on FY2020 levels, as outlined in BHP's Social Value reporting. To work towards these objectives, Minera Escondida has quantified GHG emissions for Scopes 1 and 2 using the BHP "Scope 1, 2, and 3 Emissions Calculation Methodology," aligning with the GHG Protocol standards.</p> <p>Minera Escondida has developed a decarbonization roadmap and is actively implementing projects aimed at reducing emissions, such as renewable energy initiatives. This roadmap is monitored monthly using</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>specific Key Performance Indicators (KPIs) and is reported internally through the "Plan Compliance" report. Externally, progress is communicated through the annual report and the Social Value Report.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida's Greenhouse Gas (GHG) policy is integrated into its Energy Management System, aiming for energy efficiency and GHG reduction with the goal of net zero GHG emissions by 2050. BHP reports GHG emissions through its Annual Report, with a detailed process for data transmission and quantification. Minera Escondida has initiated renewable energy and energy efficiency projects to enhance resource efficiency and reduce GHG emissions from energy generation.</p> <p>During site visits, it was observed that the mine pit at Escondida contributes to 90% of total Scopes 1 and 2 GHG emissions. The desalination plant at Coloso holds ISO 50001 certification. Measures at Puerto Coloso to reduce GHG emissions include replacing two oil-powered tugboats with electric ones charged in Antofagasta (expected arrival in the coming months), utilizing the Reuchi platform for ship control and GHG measurement, and deploying a vessel with a wind-assisted turbine that will reduce fuel consumption when wind conditions are favourable.</p> <p>Currently, diesel is used at the LX/SX/EW plants to heat boilers, but there are plans to install a solar thermal plant by 2026 to replace these boilers.</p>
16	Renewable Energy	To implement and quantify energy efficiency improvements and increased use of renewable energy to reduce total energy consumption and/or energy intensity.	Fully Meets	<p>Minera Escondida has implemented an Energy Management System in accordance with local Energy Efficiency Law. The management system is formalized through an Energy Efficiency Policy aimed at improving energy consumption. Under its Energy and Decarbonization strategy, Minera Escondida is implementing projects to reduce energy consumption through renewable sources and energy efficiency measures. Evaluation of energy performance occurs monthly by involved teams, with results communicated via the BHP annual report and social value scorecard. Employee training and communication regarding progress and goals are also provided.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul>



Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>Management interviews confirmed that the organization's energy management system (SGE) includes a Greenhouse Gas (GHG) policy focused on energy efficiency and GHG reduction, aiming for net zero emissions by 2050. The desalination plant has achieved ISO 50001 certification, with an upcoming audit scheduled for April/May to comply with Law 21.305. Operations are powered by 100% renewable energy, with risks managed through supplier contracts. Energy consumption is monitored monthly against operational variables, and annual reviews identify opportunities for improvement. Initiatives and action plans derived from the mining strategy are communicated, with each countermeasure having a dedicated action plan for optimizing electrical energy use.</p> <p>An energy efficiency project has been developed at Concentrator Plants 1 and 2, where mills adjust energy usage based on the quantity and condition of incoming ore, reducing power consumption when the mineral is not fully intact.</p>
17	Freshwater Management and Conservation	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.	Fully Meets	<p>Minera Escondida does not abstract freshwater for use in its production process; all water is sourced from the desalination plant located at Puerto Coloso and from water recovered from the tailings. The company has assessed water-use impacts and risks, implementing measures to enable water availability for other users and reduce impacts on biodiversity within the catchment area. These efforts are carried out collaboratively with relevant interest groups, which are identified and classified according to their specific interests and commitment strategies.</p> <p>The main documents and records reviewed for the Copper Mark verifiers included:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews covered knowledge of water policies and management, including the extraction process and operational systems. They also discussed the conducted risk and impact assessments related to water consumption.</p> <p>Employee and contractor interviews indicated their general awareness of internal policies and procedures addressing environmental management, including water management. They mentioned that operations exclusively use desalinated seawater and do not utilize freshwater for production processes.</p>
18	Waste Management	To implement a risk-based waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (hazardous, non-hazardous, and inert)	Fully Meets	<p>Minera Escondida has implemented a waste management system based on the "Waste Hierarchy", which is applied to both hazardous and non-hazardous waste. This system is aligned with BHP's policies and includes waste reduction targets for FY25 and FY30. It encompasses policies, procedures, collection programs, and waste treatment initiatives. Minera</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>Escondida has also launched programs aimed at recycling and promoting a circular economy, such as the Circularity Attributes Cluster. The implementation of this waste management system is regularly monitored.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida's waste management system aligns with a global sustainability framework, employing a waste hierarchy focused on avoidance, minimization, and restoration. The system oversees waste from generation through to disposal, utilizing authorized landfills and transfer centers for hazardous waste. Objectives and targets are regularly reviewed, supported by workflows ensuring operational and regulatory compliance. A dedicated team collaborates with external partners for waste disposal and manages waste facilities, including contract oversight. The environmental management team strategically coordinates operations, services, infrastructure, and stakeholder engagements to ensure effective waste management and regulatory adherence.</p> <p>Site visits confirmed a comprehensive waste segregation system with color-coded bins facilitating segregation at the source. Waste disposal occurs in on-site landfills or Controlled Waste Facilities (CTRs) based on waste classification. Ongoing training on proper waste handling and recycling initiatives is provided. Notably, initiatives like the "Quality Circles" in the SX/EW plants encourage operators to propose environmentally, safety, or socially beneficial ideas. Various recycling and reuse initiatives were observed across different sections of the site.</p>
19	Tailings Management	To design, operate, monitor, and close tailings impoundments while minimizing adverse impacts to the human health and the environment in line with internationally recognized standards.	Fully Meets	<p>Minera Escondida completed the implementation of the Global Industry Standard on Tailings Management (GISTM) in August 2023. Self-Assessment and third-party verification have confirmed that Minera Escondida has achieved a rating of "Fully Meets" across all GISTM requirements. This demonstrates compliance with Copper Mark's criterion 19.</p> <p>The document reviewed with reference to the verifiers proposed by Copper Mark was:</p> <ul style="list-style-type: none"> <li>- Minera Escondida Assessment Report for Criterion 19 of Copper Mark.</li> </ul> <p>Documentation and management interviews confirmed the assessment process for evaluating compliance with GISTM.</p> <p>Site visit observations and management discussions focused on risk control measures and operational</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>practices at the tailings storage facility (TSF). These measures include a groundwater monitoring system to oversee leakage control and water quality, as well as the installation of a geomembrane to prevent water infiltration into the walls. Despite recent rainfall, the water level in the pond within the TSF was managed appropriately, with a freeboard exceeding the required level.</p> <p>Geotechnical controls are conducted monthly on the tailings dam, focusing on piezometers and wall stability to mitigate the risk of catastrophic wall failure. The management of the TSF were observed through a real-time monitoring system.</p>
20	Pollution	To implement the mitigation hierarchy to avoid, minimize, reduce, and compensate for the adverse impacts of pollution on human health and the environment.	Fully Meets	<p>Minera Escondida has implemented policies and procedures that adhere to the mitigation hierarchy to avoid, minimize, reduce, and compensate for the effects of pollution on human life and the environment. The company has established measures and methods to control emissions and pollutants, focusing primarily on soil, water, and air. Special emphasis is placed on air quality, given that the territories experience high concentrations of particulate matter that exceed one or more environmental quality standards. In addition to following the mitigation hierarchy, Minera Escondida assesses the legal and regulatory requirements applicable to each type of pollution source and maintains direct communication with local regulatory authorities.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> <li>- Site operating permits and other legal documents</li> </ul> <p>Management interviews confirmed that Minera Escondida has established an environmental management system deeply integrated into its operational framework. This system is based on BHP's global policies, including a Charter of Values and Sustainability, supplemented by minimum operational requirements. Central to this framework is an Environmental Management System aligned with the ISO 14001 standard, designed to enable ensuring that Minera Escondida's environmental performance to meets compliance requirements s international benchmarks.</p> <p>During site visits, dust control measures were observed at the mine, including the irrigation of haul roads using water trucks and surface treatments where safety permits. A real-time dust monitoring system enables immediate intervention in areas with heightened dust levels. At the Concentrator Plant, fully enclosed structures effectively manage dust and odor emissions, complemented by dust suppression systems in the stockpile area. Elevated dust levels were noted on site, but these were not evident at the nearest receptor, the Minera Escondida camp.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				At Puerto Coloso, an air quality monitoring station with community representation indicated results within regulatory limits, averaging 35 µg/m³N, below the DS N°12/2022 standards. Monitoring outcomes are shared with the community, which utilizes advisory services funded by BHP to interpret and address the results effectively.
21	Biodiversity and Protected Areas	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.	Fully Meets	<p>Minera Escondida implements the mitigation hierarchy to manage impacts on biodiversity, designed to avoid adverse effects on Critical Habitats and Endangered Species, and refraining from operating in any World Heritage sites. The company possesses knowledge of species in the area and nearby protected areas and has developed procedures and strategies to mitigate biodiversity impacts. It has established measures for biodiversity management, including informing employees about species present in various areas and protocols for responding to sightings.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that the biodiversity management system is consistent with a BHP global strategy focused on social value and environmental health. The policy encompasses regional and global plans aimed at preventing net biodiversity loss through various policies, systems, and practices, including regulatory and voluntary monitoring. Collaboration with wildlife consultants and training for species preservation, particularly Andean flora, is emphasized. The Mitigation Hierarchy is integrated from the project study phase, with regular verifications and community-supported monitoring. The "Monturaqui" plan monitors biodiversity changes, and climate change strategies are incorporated into management plans. Awareness of the biodiversity policy is promoted through webinars and community engagement, supported by a grievance mechanism. At Salar Punta Negra, monitoring characterizes the area to establish a baseline for biodiversity protection.</p> <p>Site visits observed that educational materials on wildlife encounters are readily accessible to staff, reflecting the company's commitment to biodiversity awareness. At Puerto Coloso, the monitoring of marine ecosystems is conducted with findings communicated to the local community.</p>
22	Mine Closure and Reclamation	To have a documented plan with stakeholder inputs that addresses environmental and social aspects and makes financial provisions for closure and reclamation of the site / facility	Fully Meets	<p>Minera Escondida has a mine closure plan for operations aligned with BHP's Global Standard, which has been published and approved by the local regulatory entity. The plan specifically references stakeholder interests and includes their participation in the planning process. Financial provisions associated with closure, restoration, and compensation measures have been adopted as part of this plan.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> <li>- Site operating permits and other legal documents</li> </ul> <p>Management interviews confirmed that the closure plan complies with relevant legislation and encompasses both a comprehensive strategy and detailed plans for specific operational areas. The plan includes objectives and maintenance programs for temporary closures. It undergoes frequent updates in collaboration with major stakeholders. The latest plan, from 2022, is under continuous review, with updates prompted by Sernageomin (Servicio nacional de Geología y Minería Chile) audits, including evaluations of future projects and control assessments. Financial provisions for mine closure are approved by the Asset President.</p> <p>Employee and contractor interviews confirmed awareness of Minera Escondida closure plan.</p>
23	Community Health and Safety	To implement a management system to monitor, avoid, minimize, reduce, and compensate for adverse impacts on community health and safety	Fully Meets	<p>Minera Escondida has implemented a management system for community health and safety, collaborating with local hospitals and organizations to develop health programs. Additionally, a Community Development Plan has been established, which includes providing medical equipment to local communities. Minera Escondida has communicated to community stakeholders a channel for submitting complaints and grievances, designed to enable them to voice concerns about any health and safety issues within the community.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP's annual reporting documents</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida maintains a strong commitment to community health and safety, exemplified by specific programs such as the Coloso Health Promotion initiative. This program has conducted numerous medical and ophthalmological operations in collaboration with the Universidad de Antofagasta Clinical Hospital. Continuous monitoring through regular meetings seeks to ensure that health initiatives are effective and responsive to community needs.</p> <p>In interviews with external stakeholders, including personnel from the Universidad de Antofagasta Clinical Hospital and local community members, it was noted that ongoing communication with Minera Escondida's community team aims to facilitate the resolution of health and safety concerns. Stakeholders expressed appreciation for the support provided by Minera Escondida in addressing community needs and emphasized awareness of available channels to raise</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>doubts or complaints about health and safety issues if necessary.</p> <p>Site visit observations confirmed no visible signs of adverse impacts from the operation on the health and safety of the Coloso community.</p>
24	Community Development	To identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development.	Fully Meets	<p>Minera Escondida has implemented a community development management system aligned with BHP's requirements. It aims to identify community needs through consultations with affected communities and develops plans to address these needs through specific programs. The community actively participates in designing and co-designing these initiatives, to ensure their relevance and effectiveness.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews and discussions with the responsible team highlighted that Minera Escondida conducts regular updates of community needs assessments. Additionally, it was mentioned that the community actively participates in the design of these initiatives, with formal workgroups established to enable effective implementation. Processes for evaluating these initiatives are in place, with annual reports generated and submitted to BHP Corporate for review and approval.</p> <p>Interviews with community members confirmed that Minera Escondida maintains ongoing dialogue with various representatives and the community through established channels. It was noted that community needs are periodically assessed, with initiatives managed accordingly, demonstrating support for local development. Communities actively participate in many programs, which are communicated by the community team and disseminated by leaders and partner organizations. Notable initiatives include education, health, and productive development programs, encompassing scholarships, psychosocial and emotional support, and vocational training to bridge labor market gaps.</p>
25	Artisanal and Small-Scale Mining	To engage artisanal and small-scale miners (ASM) and facilitate their formalization and improvement of their environmental and social practices, where there are known to be legitimate ASM in the sphere of influence of the site / facility.	N/A	<p>There is no evidence to suggest that artisanal and small-scale mining occurs in the area of influence of Minera Escondida. This was verified through assessment of aerial imagery, site visits, and management interviews.</p>
26	Human Rights	To implement the UN Guiding Principles on Business and Human Rights including human rights due diligence.	Fully Meets	<p>Minera Escondida has established a human rights management system. The company follows policies and statements that comply with BHP's commitment to operating consistently with international standards, such as the Universal Declaration of Human Rights and the UN Guiding Principles on Business and</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>Human Rights. Due diligence tools have been implemented to assess and manage human rights risks, including modern slavery and human trafficking, taking a risk-based approach to the supply chain.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures and registers</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews discussed the approach to human rights due diligence, which includes a risk-based approach to assessing and managing risks in the supply chain. Minera Escondida mentioned implementing supplier audits and using advanced tools to identify and mitigate risks of modern slavery and human trafficking. The importance of continuous evaluation was emphasized to ensure alignment with global standards.</p> <p>In community interviews, some individuals mentioned receiving general information about human rights and Minera Escondida's commitment to their protection, although this wasn't universally acknowledged.</p>
27	Security and Human Rights	To implement the Voluntary Principles on Security and Human Rights (VP on SHR) when engaging with private or public security forces.	Fully Meets	<p>Minera Escondida has implemented policies aligned with the Voluntary Principles on Security and Human Rights (VPSHR), integrating principles consistent with the Universal Declaration of Human Rights and BHP Code of Conduct. Additionally, the company has established a specific procedure governing the use of force by its industrial security personnel. This procedure applies universally to all individuals engaged in private security activities at the site and clearly outlines general rules for the use of force.</p> <p>The security services contract includes clauses mandating adherence to the VPSHR and requires Minera Escondida to prepare follow-up and investigation reports for any security incidents. Employees undergo training on the Security Policy and the Use of Force Procedure.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Training packages</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida's policies on safety and human rights are robust, highlighting BHP's global commitment as a signatory to the Voluntary Principles on Security and Human Rights (VPSHR). The implementation of these</p>



Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>principles is managed through contractual clauses with private security companies and mandatory annual training. Additionally, governance structures and lines of defense are detailed to verify compliance with these policies.</p> <p>Employee and contractor interviews confirmed their understanding and implementation of the VPSHR. They have received comprehensive training from Minera Escondida, which includes maintaining internal procedures that comply with these principles and refraining from using firearms or force. In situations involving unauthorized entry with intentions of committing illegal acts, such as robberies, security personnel employ non-violent deterrent tactics like loudspeakers, beacons, and lights, and they coordinate with public security forces.</p>
28	Indigenous Peoples Rights	To implement a management system to respect the rights of Indigenous Peoples, including FPIC; avoid adverse impacts on Indigenous Peoples' lands, livelihoods, resources, and cultural heritage; and develop and implement an Indigenous Peoples' engagement plan.	Fully Meets	<p>Minera Escondida has implemented a management system for engaging with Indigenous peoples based on mutual respect and collaboration, following the principles outlined in the BHP Indigenous Peoples Policy Statement, which describes how the company is guided by the aims of the United Nations Declaration on the Rights of Indigenous Peoples. Minera Escondida seeks to obtain the free, prior, and informed consent (FPIC) of Indigenous communities affected by its operations.</p> <p>As part of this framework, Minera Escondida has developed an Indigenous Partnerships Strategy. Its primary objective is to establish stable and long-term relationships with local Indigenous communities, built on trust and mutual benefit. The strategy aims to avoid or mitigate risks related to the rights of impacted indigenous people, through informed and good faith consultations based on FPIC principles, proactive relationship management and the implementation of projects that contribute to social value.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Site operating permits and other legal documents</li> </ul> <p>Management interviews highlighted Minera Escondida's commitment to respecting the rights of Indigenous peoples, implementing dialogue and mediation processes, and collaborating on community development projects. The importance of collaboration agreements and the active participation of communities in designing and executing these projects was emphasized. Additionally, mechanisms to resolve conflicts and ensure transparency in relationships were mentioned, along with participation in forums and alignment with BHP's global standards to ensure Free, Prior, and Informed Consent (FPIC) processes are applied consistently with the BHP Indigenous Peoples Policy Statement.</p>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				In interviews with communities, it was noted that they are aware of Minera Escondida's Indigenous peoples' rights position and know how to report any violations of their rights.
29	Land Acquisition and Resettlement	Where land acquisition or resettlement is necessary: to implement a policy to explore all viable alternative project designs to avoid and/or minimize land acquisition and physical or economic displacement and to implement a resettlement action plan to fairly address and compensate for residual adverse impacts.	N/A	Review of documentation verified that Minera Escondida operations have not resulted in the resettlement of communities and there are no current or future plans for land acquisition. This was confirmed through management interviews.
30	Cultural Heritage	To identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage.	Fully Meets	<p>Minera Escondida has implemented a cultural heritage management system that emphasizes the respect and preservation of heritage elements within its operational areas. This system involves registering and monitoring all identified cultural elements, which are then uploaded into the Environmental Management System along with their geographical locations and compliance statuses.</p> <p>The company maintains an ongoing relationship with communities to seek to collaboratively map and address issues related to heritage preservation and promotion.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Internal communications and meeting minutes</li> <li>- Local procedures, strategies, action plans and registers</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews highlighted Minera Escondida's commitment to respecting and protecting cultural heritage and that a cultural heritage management system had been developed through internal consultation and significant participation. Active collaboration with local entities and communities for the enhancement of cultural heritage was also emphasized. Exhibitions and training conducted in partnership with local cultural and educational entities aim to promote heritage protection.</p> <p>In interviews with the Coloso community, stakeholders affirmed that Minera Escondida has contributed to enhancing and preserving significant cultural traditions such as the "Baile Chino" and the conservation of saltpeter heritage.</p>
31	Due Diligence in Mineral Supply Chains	To implement the OECD Due Diligence Guidance on Conflict Affected and High-Risk Areas.	Fully Meets	Minera Escondida has a structured approach to mineral supply chain due diligence guided by BHP's Responsible Minerals Program, that has been designed in alignment with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Annex II. Supply chain and human rights policies are effectively communicated to suppliers, employees, and partners,

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>fostering collaboration to ensure compliance and sustainability best practices</p> <p>Although the due diligence process has been developed and is ready for implementation, Minera Escondida did not purchase any mineral feed during the assessment period and therefore did not need to implement the process.</p> <p>The main documents and records that were reviewed regarding the criteria include:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> <li>- BHP's annual reporting documents</li> <li>- Third-party audits</li> <li>- Relevant reports and monitoring</li> </ul> <p>Management interviews confirmed that Minera Escondida does not process external mineral feed within its operations. Nevertheless, the company has reference to the supply chain due diligence system BHP has established through which relevant information on mineral and metal suppliers (e.g. Know your supplier questionnaires) is reviewed and assessed. Marketing Managers responsible for procurement are trained in due diligence processes and are supported by a Governance Team that oversees implementation and effectiveness of BHP's Responsible Minerals Program.</p> <p>BHP's Responsible Minerals Program adopted the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Annex II. The program is designed to identify, assess and mitigate risks from high-risk regions.</p> <p>Supply chain and Human Rights policies are communicated to suppliers, employees, and partners, promoting best practices and collaboration for compliance and sustainability</p> <p>Site visit observations confirmed that Minera Escondida does not receive external mineral feed, as reported by employees on site.</p>
32	Transparency and Disclosure	Report annually on environmental, social and governance performance in line with internationally recognized standards (e.g., GRI) and to publicly support the implementation of EITI, and report where appropriate.	Fully Meets	<p>BHP publishes an annual report that includes sustainability performance. This report complies with the International Council on Mining and Metals (ICMM) Sustainable Development Framework and by association the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), and is available on the BHP website. Additionally, BHP conforms to the ICMM Good Practice Guidance for Water Reporting and other recognized benchmarks and guidance such as the United Nations Global Compact principles.</p> <p>Minera Escondida conducted materiality assessments in 2022 and 2023 to identify key issues and establish continuous improvement targets.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> <li>- BHP Group policies, standards and procedures</li> </ul>

Summary of Findings Extract from Escondida Self-Assessment				EY Observations
#	Issue Area	Issue Norm	Rating (as defined by Escondida)	
				<p>- BHP's annual reporting documents</p> <p>Management interviews confirmed that BHP's annual report includes sustainability aspects and adheres to international reporting standards such as GRI, TCFD, and SASB. The report's consistency with the Global Compact principles is also verified. Stakeholders receive updates annually, and material issues are thoroughly reviewed and made available in the annual report as well as on the BHP website.</p> <p>Community interviews confirmed that Minera Escondida's regional team conducts at least annual explanatory sessions for the community. These sessions cover a range of topics including the company's social investments, environmental performance, production details, and other pertinent information, ensuring transparency and community engagement with Minera Escondida's operations and initiatives.</p>