



Building a better
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Independent Reasonable Assurance Report to the directors and management of BHP Group Limited, and the directors and management of Minera Spence S.A.

Our Opinion

In our opinion, the assertions made by management that Minera Spence S.A. (Minera Spence) fully or partially met all applicable criteria in the Minera Spence 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 Spence'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 Spence has applied the requirements of the Copper Mark Criteria Guide¹ (Criteria), which apply for both The Copper Mark and The Molybdenum Mark. 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 Spence'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 Spence'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 Spence
- ▶ 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 Spence'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 Spence 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 Spence 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 Spence 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 M. Fricke

Ernst & Young
Melbourne, Australia
31 October 2024

Meg Fricke
Partner

¹ Copper Mark criteria: 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 Spence'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 Spence'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 Spence S.A. ('the Company')
Name of site	Spence
Address	Cerro El Plomo 6000, Las Condes (the site is located in the Atacama Desert)
Country of operation	Chile
Metals produced on site	Copper, molybdenum, with by-products including 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 type="checkbox"/>
Other (please explain)	<p>Minera Spence S.A. is located over 1750 meters above sea level near the commune of Sierra Gorda in the Province of Antofagasta, Region of Antofagasta, approximately 50 km southwest of Calama and 150 km to northeast of Antofagasta. This site began operations in December 2006.</p> <p>Spence produces copper cathodes and copper concentrate, with by-products including gold, silver and molybdenum.</p> <p>The current infrastructure on site consists mainly of crushing facilities, feed concentrator, and leaching processes, 1 copper concentrator plant with 95 ktpd capacity (by-products: gold and silver), molybdenum plant, dynamic leach pads, solvent extraction and electrowinning plant.</p>

¹ Copper Mark criteria: https://coppermark.org/wp-content/uploads/2020/08/Copper-Mark-Criteria-Guide_FINAL_24FEB20.pdf

	<p>Minera Spence has no external feed of copper or copper concentrate.</p> <p>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.</p>
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Independent Site Assessment Information

Name of the Lead Assessor	Meg Fricke, Luke Kitchen, Nicolas Calderon, Tamara Contreras, Rominna Gaete.
Name of the Assessment firm	EY
Date(s) of assessment activities (dd/mm/yyyy – dd/mm/yyyy)	15 April 2024 – 18 April 2024
Assessment period	1 July 2023 – 30 June 2024
Summary of the Assessment Methodology	<p>EY developed a reasonable assurance methodology specific to Copper Mark, in accordance with the International Standard on Assurance Engagements (ISAE) 3000. This methodology comprised:</p> <ol style="list-style-type: none"> 1. Planning and Assurance Strategy <ul style="list-style-type: none"> ▶ Kick-off meeting with BHP (Spence) management ▶ Assessment of performance expectations against Copper Mark criteria, including commitment to Copper Mark ▶ Risk assessment tailored to Spence's operational context and specific Copper Mark criteria ▶ Development of procedures and approaches for the review execution. 2. Execution <ul style="list-style-type: none"> ▶ Examination of documentation, including policies, procedures, data, and other relevant evidence ▶ Virtual meetings with Spence professionals to understand existing processes and activities related to Copper Mark's performance expectations ▶ Site visit to Spence, including interviews with workers and local stakeholders ▶ Comparison of Spence'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 <ul style="list-style-type: none"> ▶ Executive review of Self-Assessments ▶ Preparation of the Detailed Report ▶ Preparation of the reasonable assurance statement ▶ Final review meeting with Spence management to validate ratings, gaps identified, and plans for addressing them ▶ Finalization of the Detailed Report. <p>Assessment Timeline:</p> <ul style="list-style-type: none"> ▶ 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 15-17, 2024

Summary of the Assessment Activities

We base our assurance conclusion on ISAE 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (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 Spence management (18 virtual meetings and 2 in-person meeting)
- ▶ Conducting in-person and virtual interviews with 59 Spence employees
- ▶ Conducting in-person interviews and focus groups with 67 members of the local communities
- ▶ Conducting in-person interviews with 9 suppliers
- ▶ Conducting on-site inquiries and observations
- ▶ Reviewing the applicability of the Copper Mark criteria for Spence
- ▶ 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 Spence's management approach.

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
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 Spence has implemented a management system for legal compliance, that integrates environmental management and climate change considerations designed to ensure adherence to national and international 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"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Third-party audits - Internal communications and meeting minutes - Local procedures and registers <p>Employee and contractor interviews indicated their awareness of relevant laws and regulations, with confirmation of regular training and information dissemination through videos and posters.</p> <p>Site visits showed legal compliance information conveyed via posters, bulletins, and videos in areas like the dining hall and human resources offices. Monitoring and controlling legal compliance using the EMAS platform was also observed.</p>

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
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 Spence has implemented a management system to prohibit bribery, corruption, and anti-competitive behaviour. This system aligns with BHP's code of conduct and a crime prevention manual applicable to all employees and contractors. It includes annual risk assessments and controls designed to prevent facilitation payments, particularly for high-risk positions, along with continuous monitoring and monthly compliance audits. Multiple reporting channels, such as 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 contractors.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures and registers - Training packages - Relevant reports - Site operating permits and other legal documents <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. Site observations observed proactive measures to foster a positive business culture.</p> <p>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 Spence has developed a stakeholder identification map that undergoes regular updates, with the latest available version from October 2023. A Community Engagement Plan has been established, detailing relationship objectives, areas of interest, the scope of influence, and engagement strategies.</p> <p>To monitor compliance with the plan, monthly reports are generated outlining the main completed activities.</p> <p>A procedure for handling community concerns, complaints, and claims has been developed, aligning with the effectiveness criteria of the United Nations Guiding Principles on Business and Human rights and the ICMM Guide to the Management and Resolution of Concerns and Complaints at the Local Level. According to the procedure, stakeholders can use channels such as WhatsApp, email, local community representatives, or</p>

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
				<p>representatives from contractor companies or business partners to lodge their concerns.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Third-party audits - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports - Site operating permits and other legal documents <p>Management interviews noted ongoing updates to the stakeholder database for new entries like authorities and Neighborhood Councils. Discussions covered stakeholder mapping, community needs assessment, and the complaints handling process.</p> <p>Interviews with communities highlighted a close rapport with Minera Spence's team, prompt responsiveness to community inquiries, and clear guidance on submitting queries, complaints, and claims.</p>
4	Business Partners	To promote responsible business practices with significant business partners, including suppliers.	Fully Meets	<p>Minera Spence promotes responsible business practices among its partners through programs like the Green Pathway Program, formalized in its Code of Conduct policies and procedures. Supplier evaluation and selection processes emphasize responsible practices, with ongoing contract monitoring for compliance. Systematic controls and background checks assess risks in business relationships. ESG training is provided to partners. Additionally, BHP's 24-hour confidential reporting tool is available to business partners.</p> <p>Minera Spence's commitment to local communities is reflected in its local purchasing program that supports indigenous suppliers, and its influence on business partners is evident through initiatives like the Green Pathway Program, which encourages responsible practices. The company employs systematic controls and background checks to evaluate risks in business relationships and ensures supplier adherence to international standards using BHP's criteria and platform BHP's 24-hour confidential reporting tool for incident reporting. Training for personnel involved in procurement is managed by partners who oversee commercial contracts and compliance, with support from a global supply team at each operation.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Minera Spence implements a local purchasing program supporting Indigenous community suppliers. The Green Pathway Program demonstrates its influence on business partners to promote responsible practices. Systematic controls and background checks assess risks in business relationships. BHP has systems to oversee suppliers' to ensure adherence to</p>

Summary of Findings				EY Observations (Evidence to support determination)
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				<p>certain international standards and BHP's 24-hour confidential reporting tool is available to report incidents. Training for relevant personnel is overseen by procurement partners, who manage commercial contracts and compliance with support from a global supply team present at each operation.</p> <p>Management interviews detailed Minera Spence's supplier selection and evaluation policy, guided by BHP's Code of Conduct and commitments to decarbonization.</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 Spence operates under BHP's Human Rights Policy Statement that documents 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 stipulate that employees must provide specific documents before commencing their duties and outline that individuals must be at least 18 years old, except in cases of apprenticeship contracts.</p> <p>BHP's Supply Global Standard mandates that suppliers adhere to certain requirements, such as refraining from employing children before they complete their mandatory education (as per local legislation) and setting the minimum age for employment not below 15 years.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews emphasized the Human Rights Policy Statement focus on prohibiting child labor and detailed Minera Spence's procedures for recruitment, selection, and contracting to ensure compliance with minimum age requirements. They acknowledged systemic barriers in place to prevent minors from entering the site. Minimum requirements for service providers included the prohibition of hiring children who have not completed mandatory education.</p> <p>Employee, contractor, union representatives, and female employee groups confirmed no instances of child labor. They were aware of the Corporate Policy, Code of Conduct, and Internal Regulations accessible via BHP's HR+ employee website.</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 Spence 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>

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
				<p>Minera Spence utilizes a Risk Assessment process to evaluate the risk of forced labor throughout its operations and supply chain. Contracts include clauses aimed at preventing modern slavery.</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"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews confirmed that the BHP Human Rights Policy Statement addresses and prohibits forced labor. They mentioned the existence of controls over contractor companies to ensure compliance with this policy through document verification. Employees receive annual training on these issues.</p> <p>Employees and contractors confirmed no instances of forced labour experienced. They are aware of the Human Rights Policy Statement prohibits forced labor and receive training on the Code of Conduct, which covers this issue.</p> <p>During site visit no instances of forced labor were observed.</p>
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 Spence maintains a management system designed to ensure that the rights of its employees to unionize and engage in collective bargaining 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 Spence actively engages in collective bargaining processes and conditions for unionized employees to meet. Additionally, the company provides training and awareness programs to inform employees about their rights.</p> <p>BHP's Supply Global Standard mandates compliance with various requirements, including the respect for freedom of association.</p> <p>Link to BHP's global complaints mechanism: https://secure.ethicspoint.com/domain/media/en/gui/23435/index.html</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Local procedures, strategies, action plans and registers - Relevant reports and monitoring

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
				<p>Management interviews confirmed that Minera Spence is subject to the BHP Human Rights Policy Statement, which supports freedom of association and effective recognition of the right to collective bargaining. The BHP Code of Conduct prohibits discrimination based on union membership, and a high rate of union participation among employees was observed.</p> <p>Union representatives affirmed Minera Spence 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 Spence has a management system in place to identify and prevent discrimination within the company. This commitment is outlined in the Human Rights Policy Statement, which pledges to eliminate discrimination in employment and occupation (in accordance with ILO Convention No. 100 and No. 111).</p> <p>BHP's Code of Conduct reinforces a commitment to providing a safe workspace free from discrimination, harassment, sexual harassment, bullying, racism, and racial harassment.</p> <p>Minera Spence conducts Respectful Behavior training for its employees. The company maintains a complaints mechanism with various channels: HR+ website, BHP's 24-hour confidential reporting tool, and direct reporting to leaders. Clear procedures are established to address filed complaints, including those related to discrimination.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Management interviews confirmed that the BHP Human Rights Policy Statement, Code of Conduct, and Charter support Minera Spence's commitment to non-discrimination. Practices in recruitment, employee selection, and compensation to prevent and address discrimination were highlighted. It was noted that any instances of discriminatory practices can be reported through established complaint channels, with regular training provided to employees.</p> <p>During interviews with employees, it was noted they are aware of the non-discrimination policy and its accessibility. They confirmed no personal experiences or observations of discrimination at Minera Spence and understand the formal complaint process.</p> <p>Site visits did not identify visible signs of discrimination.</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 Spence operates under BHP's Inclusion and Diversity Position Statement that includes goals and initiatives aimed to promote gender equality in the workplace. Related include the Graduate Program and the Women Miners Program, both focused on women, as well as mandatory training for employees aimed at eliminating harassing behaviors and fostering an inclusive culture and work environment.</p> <p>Minera Spence conducts salary band analyses to ensure equal pay between men and women performing jobs of equal value. The company provides reporting and grievance channels, along</p>

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
				<p>with clear procedures to address complaints, including those related to workplace and sexual harassment.</p> <p>Minera Spence monitors indicators and takes actions to promote gender equality, paying special attention to the proportion of female staff in the workplace.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Management interviews confirmed Minera Spence is subject to the BHP Inclusion and Diversity Position Statement .They outlined efforts to promote gender equality, including goals set for female representation by 2025 and annual salary gap analyses.</p> <p>Employees and contractor interviews confirmed their knowledge of the Inclusion and Diversity Position Statement and complaint and grievance channels. They also confirmed receiving relevant training. Female employees stated they do not experience gender discrimination and feel they have equal opportunities.</p> <p>Site observations showed significant female representation across various work areas.</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 Spence has implemented a management system to regulate working hours. This system includes an Attendance Record to verify working hours and rest cycles, an Internal Regulation and Contract format detailing shifts and work hours, the BHP Supply Global Standard that mandates a commitment to respecting the agreed-upon working hours in a supplier's workforce and a standard Supplier Contract Format specifying that working hours must not exceed national legal standards. The different work shift options are:</p> <ul style="list-style-type: none"> i) 7 work days (84 weekly working hours) and 7 rest days, ii) 4 work days (45 weekly working hours) and 3 rest days. <p>This workshifts apply to employees and to contractors. Workshifts are defined in compliance with the national law. Additionally, the system ensures compliance with vacation entitlements.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Training packages - Site operating permits and other legal documents <p>Management interviews confirmed that Spence operates with authorized work shifts, with some employees operating under Article 22 (national law), which allows for exemptions from standard working hour limitations. The company has procedures to accurately record, monitor and comply with work hours.</p>

Summary of Findings				EY Observations (Evidence to support determination)
#	Criterion	Issue Norm	Rating (as defined by Spence)	
				Employees confirmed compliance with shift work hour limits and the ability to take vacations, which are coordinated with their work areas and can be managed through the HR platform. Any additional hours worked at Minera Spence are on a voluntary basis, mutually agreed upon, and compensated accordingly.
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 Spence has a remuneration management system that determines compensation based on factors such as level of responsibility, location, market benchmarks, individual capability, relevant experience, and performance.</p> <p>Regular salary studies in the national mining sector are conducted by a consulting firm to inform updates to collective agreements, ensuring salary adjustments are accounted for accordingly. 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"> - BHP Group policies, standards and procedures - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Management interviews outlined BHP's salary payment system and actions to maintain competitive industry salaries, including the review process for remuneration changes.</p> <p>Employee and contractor interviews confirmed timely salary payments, accessible payment information on HR+ website, and knowledge of contact methods for raising concerns (phone, email, HR office).</p>
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 Spence has implemented an internal occupational health and safety management system aligned with the of ISO 45001 Plan, Check, Do, Act approach. This system includes a Sustainable Development Policy, Occupational Health and Hygiene Manual, various procedures, risk matrices, emergency drills, among other components.</p> <p>Personal Protective Equipment (PPE) requirements are clearly posted in work areas, and PPE is readily available to employees.</p> <p>Minera Spence maintains records of incident investigation minutes conducted internally and inspections conducted by governmental entities.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Management interviews confirmed the importance of documents such as the Policy, Occupational Hygiene and Health Manual, Emergency Response Protocol, procedures, and Global Standards, including safety training.</p> <p>Employee and contractor interviews confirmed their familiarity with the health and safety procedures. They noted that drills and</p>

Summary of Findings				EY Observations (Evidence to support determination)
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				<p>training sessions prepare them for emergencies, and mentioned that Minera Spence provides PPE at no cost.</p> <p>Site visits confirmed secure and hygienic facilities with clearly marked emergency points and visible signage instructing on PPE usage, which employees and contractors follow.</p>
13	Employee Grievance Mechanism	To establish and implement a grievance mechanism accessible to all employees.	Fully Meets	<p>Minera Spence has established and implemented a complaints submission mechanism in line with the United Nations Guiding Principles on Business and Human Rights, accessible to all its employees. The company maintains a Complaints Policy and a Complaints and Investigation Procedure, detailing the scope of the mechanism, the avenues for lodging complaints (Human Resources, Labor Relations, , BHP's 24-hour confidential reporting tool or directly to a leader), and the procedures for receiving and investigating complaints.</p> <p>Minera Spence maintains records of complaints and claims, which are periodically reported to its board of directors.</p> <p>Employees have received training on the reporting channels, and Minera Spence actively disseminates and makes these channels available to all employees.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Management interviews outlined Minera Spence's complaints mechanism, including channels for complaints, reporting responsibilities, and system oversight. They emphasized key documents like the BHP Whistleblowing Policy and Code of Conduct, which mandate reporting concerns about violations. Verification of complaint records and explanation of the complaints procedure were also discussed. They confirmed that employees have received training on these protocols.</p> <p>Employee and contractor interviews detailed the methods for filing claims: reporting to a leader, using the BHP's 24-hour confidential reporting tool portal, or contacting Human Resources or Labor Relations. QR codes on site posters facilitate access to these channels. Employees confirmed they received training on the process and understood the associated investigation procedures for complaints.</p> <p>During site visits, posters were observed throughout the site providing access the BHP 24-hour confidential reporting tool. Human Resources personnel explained Minera Spence's complaints mechanism and procedures.</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	<p>Minera Spence demonstrates compliance through certification of its Environmental Management System (EMS) to the ISO 14001 standard.</p>

Summary of Findings				EY Observations (Evidence to support determination)
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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 Spence aligns with BHP's corporate objective 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 goals, Minera Spence 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>Spence has developed a decarbonization roadmap and is implementing projects such as renewable energy initiatives aimed at reducing emissions. Progress on this roadmap is monitored monthly through specific KPIs and reported internally via the "Plan Compliance" report. Externally, updates are provided through the annual report and the social value report.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews indicated BHP's Greenhouse Gas (GHG) management goal of net-zero operational GHG emissions by FY2050 and at least a 30% reduction in GHG emissions by FY2030 based on FY2020 levels. Minera Spence is exploring global carbon credits and has already cut Scope 1 emissions by 50%. BHP Chile's Social Value Report details emissions with rigorous data transmission and quantification processes.</p> <p>Employee and contractor interviews indicated awareness of internal policies addressing emission reduction and knowledge of reduction goals and actions.</p> <p>Site visits noted two charging points exclusively for electric buses used by employees, marked clearly as electric. The charging station infrastructure requires improvement; during heavy rainfall, temporary measures were taken, covering stations with plastic for protection.</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 Spence has implemented an Energy Management System compliant with local Energy Efficiency Law. This system is formalized through an Energy Efficiency Policy aimed at enhancing energy consumption practices. Additionally, Minera Spence has devised an Energy and Decarbonization strategy, focusing on projects that reduce energy consumption through renewable sources and efficiency measures. Monthly evaluations of energy performance are conducted by relevant teams. Results on energy efficiency and usage are communicated through the BHP annual report and social value scorecard. Employee training and updates on progress and objectives are also provided.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Local procedures, strategies, action plans and registers - Relevant reports and monitoring

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				<p>Management interviews indicated ongoing implementation of the energy management system, including processes for energy quantification, training initiatives, and planned efficiency projects.</p> <p>Employee and contractor interviews confirmed Minera Spence's internal policies on energy efficiency.</p> <p>During site visits, initiatives such as electric buses and a Solar Plant were noted. Inspection of the concentrator plant highlighted new flotation cell technology with smaller motors seeking electricity consumption reductions.</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 Spence currently holds three water supply contracts, with a significant portion sourced from desalination, supplemented by groundwater abstraction. The company has assessed the impacts and risks associated with water use and has implemented protective measures to safeguard water availability for other users and reduce impacts on biodiversity within the catchment area. These efforts involve collaboration with identified interest groups, classified according to their specific interests and commitment strategies.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <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.</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 Spence has implemented a waste management system based on the "Waste Hierarchy," applied to both hazardous and non-hazardous waste, aligned with BHP's policies and waste reduction targets for FY25 and FY30. The system includes policies, procedures, collection programs, and waste treatment. Minera Spence has also initiated programs to promote circular economy practices, exemplified by the Circularity Attributes Cluster. Regular monitoring is conducted to assess the effectiveness of this system.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews confirmed that Minera Spence's waste management policy adheres to a waste hierarchy aligned with its sustainable development goals since 2020. Emphasis was placed on promoting a circular economy, with specific targets set for waste reduction by FY25 and FY30. Comprehensive guides</p>

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				<p>prioritize waste streams, with monthly tracking through PowerBI dashboards linking waste generation to copper production goals.</p> <p>Employee and contractor interviews indicated a general awareness of internal waste management policies and recycling practices across operational areas.</p> <p>During site visits, Minera Spence's waste segregation system using color-coded containers was observed, facilitating waste identification.</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.	Partially Meets	<p>Minera Spence has started aligning with the Global Industry Standard on Tailings Management (GISTM). Minera Spence has completed a self-assessment and formulated an action plan, known as the GISTM Implementation Program, and is working towards full compliance with Copper Mark's Criterion 19. Expected timelines for completion of the GISTM Implementation Program is Q1 CY2025 which is consistent with expectations for TSFs with consequence classifications of low to high.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - GISTM Self-assessment - GISTM Implementation Program at Spence <p>Management interviews confirmed that Minera Spence has initiated the implementation of the Global Industry Standard on Tailings Management (GISTM), but has not yet fully met all requirements of GISTM in accordance with the timeline for members of the ICMM. The company is committed to achieving compliance with this global standard at the Asset level, with a dedicated focal point overseeing adherence.</p> <p>During site visits and discussions with management, the focus was on the daily management of the Tailings Storage Facility (TSF) and ongoing work. A vantage point provided a comprehensive view of operational lagoons and active tailings basins. Discussions confirmed the operational status of a groundwater monitoring system, with plans to expand it to enhance leakage control and monitor water quality. Furthermore, it was noted that 30% of the TSF water is reclaimed and reused in the concentrator plant's operations.</p> <p>Emergency response plans were also reviewed and discussed.</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 Spence has implemented policies and procedures following the mitigation hierarchy to prevent, minimize, reduce, and compensate for the impacts of pollution on human health and the environment. The company has established measures and methods to control emissions and pollutants, focusing primarily on air, soil, and water. In addition to adhering to the mitigation hierarchy, Minera Spence evaluates the legal and regulatory requirements applicable to each 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"> - Local procedures, strategies, action plans and registers - Relevant reports and monitoring - Site operating permits and other legal documents

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				<p>Management interviews highlighted the air quality management system, which is part of the company's broader climate change and pollution reduction efforts. The system adheres to a mitigation hierarchy aimed at minimizing pollution, and employee training on these issues is conducted through a Learning Management System (LMS) and events such as HSE Day. Minera Spence also performs continuous monitoring of water and air emissions, with established alert protocols for any deviations. Data quality is maintained through the use of external accredited technical providers to ensure regulatory compliance.</p> <p>Air quality monitoring results at the Sierra Gorda community are uploaded to the SMA (Superintendencia del Medio Ambiente) database, confirming PM10 exceedances against regulatory limits, which are caused by various factors (including two other mine sites). Spence has undertaken studies to demonstrate that its impact on air quality (in particular PM10) at Sierra Gorda is limited.</p>
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 Spence implements the mitigation hierarchy to manage impacts on biodiversity, designed to avoid adverse effects on Critical Habitats and Endangered Species and refraining from operating within any World Heritage sites. Minera Spence possesses knowledge of species within its operational and nearby protected areas. It has established biodiversity management measures, including training employees on local species and protocols for encountering them.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews discussed Minera Spence's operations under BHP's global biodiversity strategy, integrated into its social value pillars including its Healthy environment goal for FY2030. Procedures manage biodiversity-related events and non-conformities, guided by an annual risk inventory for mitigation. Environmental supervision is required in areas involving earth movement, considering biodiversity aspects.</p> <p>During site visits, it was noted that existing informational signs about local wildlife were deteriorated, but new signs have been procured and will be installed soon. Educational materials about local fauna and instructions for wildlife encounters were lacking in offices, though two types of posters have been designed and are scheduled for distribution across various areas soon.</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>It is evident that Minera Spence has a mine closure plan for operations aligned with BHP's Global Standard, which is published and approved by the local regulatory entity. The plan specifically references stakeholder interests and includes provisions for their inclusion. Financial provisions for closure, restoration, and compensation measures have also been adopted.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers

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				<ul style="list-style-type: none"> - Relevant reports and monitoring - Site operating permits and other legal documents <p>Management interviews confirmed compliance of the mine closure plan with regulatory requirements. The plan has been updated to align with key changes in the mine plan at Minera Spence. Financial provisions for closure have been approved by the Asset President.</p> <p>Employee and contractor interviews confirmed awareness of Minera Spence's 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 Spence has policies confirming its commitment to community health and safety. In December 2023, the company conducted a Community and Human Rights Impact and Opportunity Assessment (CHRIOA), which highlighted community concerns about dust contamination. Minera Spence has completed a Community Screening Human Health Risk Assessment for the Sierra Gorda community which outlined the potential impact of Minera Spence's operations from the dust exposure risk to the Sierra Gorda community. The Community Development Plan also addresses this concern, specifically noting the potential impact of suspended particles on the health and environment of the Sierra Gorda community. Minera Spence has initiated health support programs in Sierra Gorda and Baquedano.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews indicate direct collaboration with community health sectors, developing tailored health initiatives through a co-design approach that responds to community-identified needs.</p> <p>Community interviews confirmed that Minera Spence has conducted various health operations, including ophthalmological procedures and mammograms.</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 Spence has plans that implement its commitment to social responsibility and community development, including the Community Development Plan, Community Relations Plan, and Social Value Report. The company maintains a stakeholder mapping process that aims to identify and address community needs through consultations. The outcomes of these consultations inform annual social development initiatives and programs, which are documented in the Community Development Plan.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring

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				<p>Management interviews underscored BHP's corporate Human Rights Policy Statement, applicable across all operated assets, including Minera Spence. They highlighted the evaluation of Human Rights risks and opportunities.</p> <p>Community interviews confirmed ongoing dialogue between Minera Spence and community representatives through collaborative community development initiatives. Participants noted that initiatives are collectively agreed upon, and any queries or concerns are addressed directly with the Minera Spence team.</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	There is no evidence to suggest that artisanal and small-scale mining occurs in the area of influence of Minera Spence. This was verified through assessment of aerial imagery, site visits, and management interviews.
26	Human Rights	To implement the UN Guiding Principles on Business and Human Rights including human rights due diligence.	Fully Meets	<p>Minera Spence has established a human rights management system. Minera Spence 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 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 key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures and registers - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews confirmed that BHP has a Human Rights policy applicable to all its operated assets, including Minera Spence. They also conducted an assessment of Human Rights risks and opportunities to complement the existing policy.</p> <p>Community interviews indicated that direct communication about Minera Spence's commitment and progress on Human Rights matters has been limited. However, they acknowledged that these issues are implicitly addressed through certain community activities.</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 Spence 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 the BHP Code of Conduct. The company has also established specific procedures governing the use of force by its industrial security personnel. These procedures apply universally to all individuals engaged in private security activities at the site, clearly outlining general rules for the use of force. Security service contracts include clauses mandating adherence to the VPSHR and requiring Minera Spence to prepare follow-up and investigation reports for security incidents. Employees</p>

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				<p>undergo training on the Security Policy and Use of Force Procedure.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Training packages - Relevant reports and monitoring <p>Management interviews confirmed Minera Spence's robust safety and human rights policies, emphasizing BHP's global commitment under the Voluntary Principles on Safety and Human Rights (VPSHR). Implementation includes contractual clauses with private security firms and mandatory annual training. Detailed governance structures ensure policy compliance.</p> <p>Employee and contractor interviews affirmed understanding and implementation of the VPSHR. They receive thorough training, maintain compliant internal procedures, and refrain from firearm or force use. Non-violent deterrent tactics such as loudspeakers, beacons, and lights are employed for unauthorized entries or illegal acts like robberies, with coordination involving 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.	N/A	According to official and public information from the National Indigenous Development Corporation (CONADI), Minera Spence does not have Indigenous peoples in its area of influence. Local stakeholder mapping has also confirmed the absence of identified Indigenous peoples.
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 Spence 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 Spence has implemented risk management policies and processes focused on cultural heritage, aimed at properly managing the cultural and archaeological assets present at the mining site. These risks are integrated into the environmental management system.</p> <p>Stakeholder mapping concerning cultural heritage has been completed, and procedures for handling archaeological sites and chance finds are maintained. Employees receive training on cultural heritage management, and the community is kept informed about related findings and activities.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p>

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				<ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Internal communications and meeting minutes - Local procedures, strategies, action plans and registers - Relevant reports and monitoring <p>Management interviews discussed Minera Spence's cultural heritage strategies, including policies, management plans, and budgets. The mapping of stakeholder interests and the cultural heritage risk matrix were emphasized, along with the establishment of the Principal of Cultural Heritage position to support protection of both tangible and intangible heritage. Training for employees and procedures for chance findings were also highlighted. Collaborative efforts with internal stakeholders were detailed, including sessions resulting in agreements to support archaeological site protection alongside operational activities, ensuring effective management and preservation.</p> <p>Community interviews indicated general awareness of Minera Spence's cultural heritage procedures. Community members mentioned active involvement in defining and promoting opportunities to enhance cultural heritage in both areas.</p> <p>Site observations noted fenced cultural heritage exclusion zones with appropriate signage.</p>
31	Due Diligence in Mineral Supply Chains	To implement the OECD Due Diligence Guidance on Conflict Affected and High-Risk Areas.	Fully Meets	<p>Minera Spence 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.</p> <p>Supply chain and human rights policies are effectively communicated to suppliers, employees, and partners, 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 Spence did not procure any mineral feed during the assessment period, hence did not need to activate the process.</p> <p>The key documents and records reviewed for Copper Mark verification were:</p> <ul style="list-style-type: none"> - BHP Group policies, standards and procedures - BHP's annual reporting documents - Third-party audits - Relevant reports and monitoring <p>Management interviews confirmed that Minera Spence 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>

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				<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>During site visits, no signs of external mineral feed into Minera Spence were observed, which was also confirmed by on-site employees.</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 its 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 Spence 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"> - BHP Group policies, standards and procedures - BHP's annual reporting documents <p>Management interviews confirmed that BHP is committed to sustainability reporting and produces an annual report that complies with GRI, TCFD, and SASB standards, as well as the principles of the Global Compact. Stakeholders are kept informed with annual updates, and material issues are thoroughly reviewed and made available in the annual report and on BHP's website.</p> <p>Community interviews highlighted the active engagement of community members in annual sessions conducted by the Minera Spence team. These sessions provide the community with updates on the company's social investments, environmental performance, production, and other pertinent topics.</p>