



2022 <u>Social</u> Responsibility Report



01. BUSINESS MODEL

- 1.1. COPPER MARKET
- 1.2. ORGANISATION AND STRUCTURE
- 1.3. ATLANTIC COPPER'S PURPOSE, VISION, MISSION AND STRATEGY.
- 1.4. STRATEGIC OBJECTIVES AND ACTIONS 2019-2022
- 1.5. MEDIUM- AND LONG-TERM RISKS
- 1.6. MARKET RISKS

02. REFERENCE FRAMEWORKS

- 2.1. FCX PRINCIPLES OF BUSINESS CONDUCT
- 2.2. ICMM SUSTAINABLE DEVELOP-MENT PRINCIPLES
- 2.3. SOCIAL RESPONSIBILITY MANA-GEMENT SYSTEM (IQNET SR10-ISO 26000)
- 2.4. ENVIRONMENTAL MANAGEMENT SYSTEM (ISO 14001)

- 2.5. EMAS STATEMENT
- 2.6. ENERGY MANAGEMENT SYSTEM (ISO 50001)
- 2.7. SAFETY MANAGEMENT SYSTEM (ISO 45001)
- 2.8. HEALTHY WORKPLACE MANAGE-MENT SYSTEM
- 2.9. MANAGEMENT SYSTEM FOR CRIMINAL COMPLIANCE (UNE 19601)
- 2.10. QUALITY MANAGEMENT SYSTEM (ISO 9001)
- 2.11. ASSET MANAGEMENT SYSTEM (ISO 55001)
- 2.12. UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (ODS 2030)
- 2.13. AUTHORISED ECONOMIC OPERATOR (ES AEOF 16000002E4)
- 2.14. THE COPPER MARK
- 2.15. SPANISH NETWORK OF THE GLOBAL COMPACT
- 2.16 TOP EMPLOYER

03 ENVIRONMENT / RESULTS

3.1. ENVIRONMENTAL IMPACT
3.1.1. CARBON EMISSIONS
3.1.2. ATMOSPHERIC EMISSIONS

- 3.2. WASTE
- 3.2.1. RECYCLING
- 3.2.2. WASTE RECOVERY AND DISPOSAL
- 3.2.3. FOOD WASTE COMBAT ACTIONS
- 3.3. WATER CONSUMPTION
- 3.3.1. RAW MATERIALS CONSUMPTION 3.3.2. DIRECT AND INDIRECT ENERGY CONSUMPTION
- 3.3.3. ENERGY EFFICIENCY
- 3.3.4. USE OF RENEWABLE ENERGIES
- 3.4. CLIMATE CHANGE
- 3.4.1. GREENHOUSE GASES (GHG) 3.4.2. MEASURES FOR ADAPTING TO THE CONSEQUENCES OF CLIMATE CHANGE
- 3.5. BIODIVERSITY
- 3.5.1. MEASURES FOR PRESERVING OR RESTORING BIODIVERSITY

<mark>04.</mark> STAFF

- 4.1. POLICIES AND PROCEDURES
- 4.2. PREVENTION OF OCCUPATIONAL RISKS
- 4.3. OCCUPATIONAL HEALTH
- 4.4 KEY RESULTS
- 4.4.1. ABSENTEEISM
- 4.4.2. WORK-LIFE BALANCE
- 4.5. ACCIDENTS AT WORK
- 4.5.1. OCCUPATIONAL DISEASES
- 4.6. LABOUR RELATIONS
- 4.6.1. INFORMATION, CONSULTATION AND NEGOTIATION
- 4.6.2. COLLECTIVE BARGAINING AGREE MENT COVERAGE

- 4.7. HOURS OF TRAINING
 4.7.1. EMPLOYMENT PROMOTION MEASURES
- 4.8. DIVERSITY MANAGEMENT



5.1. HUMAN RIGHTS VIOLATION RISK PREVENTION

O6. CETHICALPRINCIPLES OF BUSINESS CONDUCT

- 6.1. CONTRIBUTIONS TO FOUNDATIONS AND NON-PROFIT ORGANISATIONS
- 6.2 USE OF THE COMPLAINTS CHANNEL

O7. SOCIETY

ACTIONS

- 7.1. POLICIES AND PROCEDURES
- 7.2. COMMITMENTS TO SUSTAINABLE DEVELOPMENT
- 7.2.1. IMPACT ON EMPLOYMENT AND LOCAL DEVELOPMENT
 7.2.2. RELATIONS AND DIALOGUE WITH LOCAL COMMUNITIES
 7.2.3. PARTNERSHIP OR SPONSORSHIP

- 7.3. SUBCONTRACTORS AND SUPPLIERS
- 7.3.1. PURCHASING POLICY
 7.3.2. CONSIDERATION OF SOCIAL AND
 ENVIRONMENTAL RESPONSIBILITY
 7.3.3. OVERSIGHT AND AUDITING SYSTEMS
- 7.3.4. RESPONSIBLE SOURCING OF MINE-RALS
- 7.4. CUSTOMERS, USERS AND CONSU-MERS
- 7.5. TAX INFORMATION
- 7.5.1. PROFITS OBTAINED
- 7.5.2. TAX ON PROFITS PAID
- 7.5.3. STATE SUBSIDIES RECEIVED



Presentation Letter

In the midst of the exciting process of global transformation that we are experiencing, we are facing challenges that raise questions about our ability to act autonomously. These include Europe's heavy dependence on the supply of essential raw materials, an obvious vulnerability in the Covid-19 crisis and the recent war in Ukraine. Against this backdrop, Atlantic Copper has demonstrated unprecedented resilience in 2022, consolidating its leadership in the responsible production of refined copper and sulfuric acid.



The successful execution of the General Maintenance Shutdown, the largest in our history, stands out as an example of our determination and unwavering will to prepare for the future. Despite difficulties and obstacles, we have made steady progress, strengthening our position in an ever-changing environment.

In addition, we have taken significant steps in initiatives such as cirCular, a project with an investment of 310 million euros that positions us as a benchmark in the sustainable production of essential metals. These metals will play a crucial role in the energy transition, digitization and sustainable mobility, key factors in building a future in line with the SDGs and climate neutrality. At Atlantic Copper we are tacking energy challenges with determination, focusing on the generation and supply of clean energy. Our clear target for 2030 is for 90% of electricity consumed to come from renewable sources and self-generation, consolidating our commitment to a cleaner and more sustainable economy.

In addition, we have set a target by 2030 of reducing CO2 emissions per tonne of copper by 50% for scopes 1 and 2, based on 2018. This demonstrates our commitment to optimizing our environmental standards.

The importance of copper in the future is undeniable, with an estimated 215 million additional cumulative tonnes needed by 2050 to meet growing demands in urbanization, sustainable mobility and energy transition. At Atlantic Copper, we are fully aware of our crucial role in meeting these needs, facing this challenge with determination and responsibility. In collaboration with our sole shareholder, Freeport-McMo-Ran, and under the highest international ESG standards, we assume our responsibility in finding solutions to the challenges of the 21st century. Our products will contribute to advancing of the energy transition, sustainable

mobility and digitization, needed to shape the course of society in the coming years.

Atlantic Copper's Social Responsibility and the work of its Foundation reflect our commitment to its environment, promoting educational, environmental, cultural and sporting initiatives in Huelva. Since 2009, we have invested nearly six million euros in projects that generate a positive impact on our community and contribute to the well-being of the people around us.

We recognize that people are at the heart of all of this. We are grateful for commitment and dedication of our staff and that of our auxiliary companies, as without them none of what we have achieved would have been possible. We are proud to have been recognized as one of the best companies in Spain to work for, a reflection of our commitment to quality work and an inclusive and rewarding environment.

'The social conductivity of copper 2022' crystallises our global work. At Atlantic Copper, we believe in building a better future together. We will continue working on continuous improvement, adaptation to market challenges and seeking innovative and sustainable solutions. Together, we will meet the challenges and build a world that is equitable, environmentally friendly, and prosperous for future generations.

Javier Targhetta
CEO Atlantic Copper







D1. BUSINESS MODEL

PRESENTATION

- 1.1. COPPER MARKET
- 1.2. ORGANISATION AND STRUCTURE
- 1.3. ATLANTIC COPPER'S PURPOSE, VISION, MISSION AND STRATEGY.
- 1.4. STRATEGIC OBJECTIVES AND ACTIONS 2019-2022
- 1.5. MEDIUM- AND LONG-TERM RISKS
- 1.6. MARKET RISKS



01.
Business



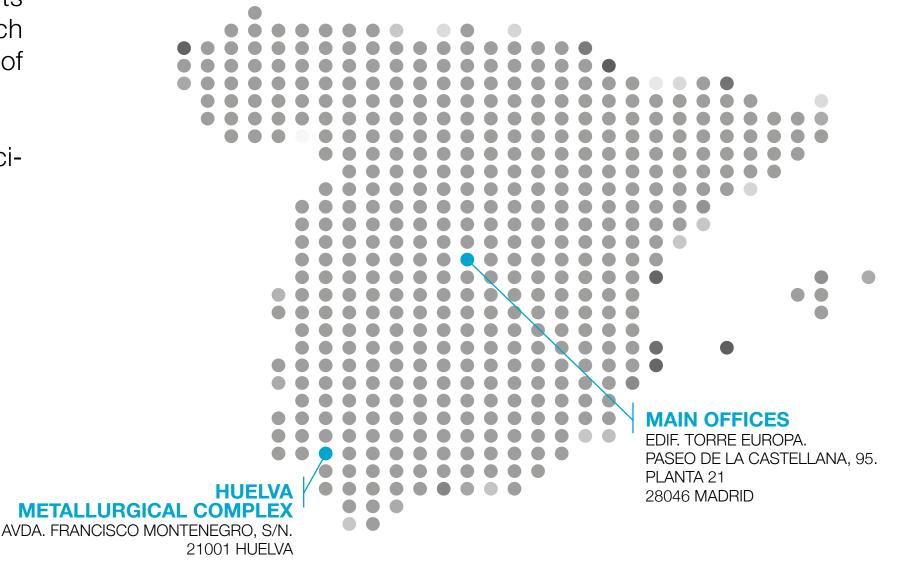
PRESENTATION

Atlantic Copper, S.L.U. (hereinafter Atlantic Copper or the Company) is a Spanish company, with its registered office and tax domicile in Huelva. Its sole shareholder is the North American company Freeport-Mc-MoRan Spain, Inc., whose direct owner of 100% of its shares is Freeport- McMoRan, Inc. (hereinafter Freeport-McMoRan or FCX).

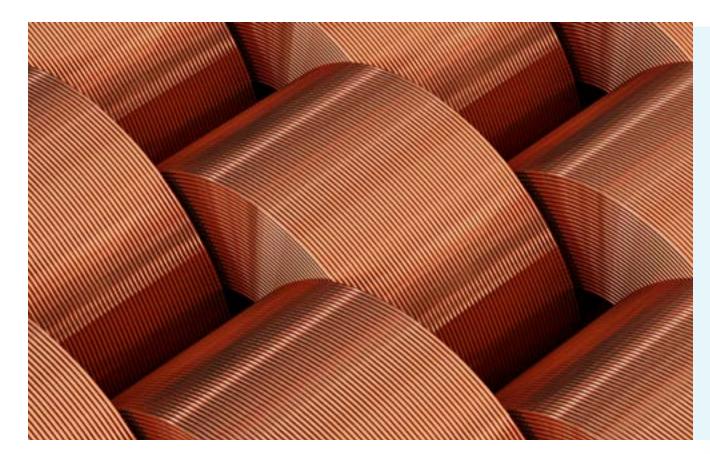
Freeport-McMoRan is listed on the New York Stock Exchange with the symbol FCX and operates major, long-lived assets all over the world which have proven and probable reserves of copper, gold and molybdenum. FCX is one of the largest publicly traded copper producers in the world.

Atlantic Copper has its production facilities in Huelva (Huelva Metallurgical Complex) and its main offices in Madrid, at which it engages in typical activities of a corporate office.

The addresses of the main facilities are:







Its core business is the production of high-grade refined copper from metallic mineral concentrate mined in different parts of the world.

Atlantic Copper's Metallurgical Complex in Huelva is an industrial production centre dedicated to the integral use of raw materials containing valuable elements.

These raw materials are mainly, although not necessarily limited to these, metallic mineral concentrates (hereinafter "concentrates") and recycled metallic materials. A significant part of the latter come from electronic devices after the end of their useful life.

Specifically, Atlantic Copper's Metallurgical Complex transfor-

ms more than one million tonnes of mineral concentrate into some 300,000 tonnes of refined copper each year.

The products resulting from the process include:

Metallic Copper

Commercialised in the form of copper anodes or cathodes

Sulphuric Acid

Electrolytic Sludges

Containing precious metals such as gold, silver, palladium, platinum, etc.

Iron Silicate

Commercial Gypsum

Nickel Carbonate

Copper Telluride

Self-Generated Electricit



Our products are commercialised in globalised markets worldwide under prices set by the market at all times. Therefore, our competitive advantage is based on making maximum use of our production capacity at the lowest possible unit cost.

The Company has likewise developed different strategic plans in recent years oriented towards improving energy efficiency and flexibility in raw materials consumption and competitiveness, as well as others aimed at achieving excellence in management systems, such as those

corresponding to safety, the environment and human resource management. As a result of these projects and earlier ones, Atlantic Copper has regularly remained at the top of the world rankings in terms of unit consumption of energy per tonne of smelted concentrate according benchmarking carried out by Wood-MacKenzie.





Copper is the third most-used metal in the world, after iron and aluminium, and it is employed in numerous industrial sectors, such as construction, automobiles, digitalisation, new technologies, renewable energies and the manufacture of industrial machinery, with electrification being its number two use worldwide.

Given its special characteristics, such as electrical and thermal conductivity, excellent corrosion resistance and malleability, copper is an essential material for the energy transition, decar-

bonisation, innovation in numerous sectors, and for the social transition to a more circular and with lower carbon emissions economy.

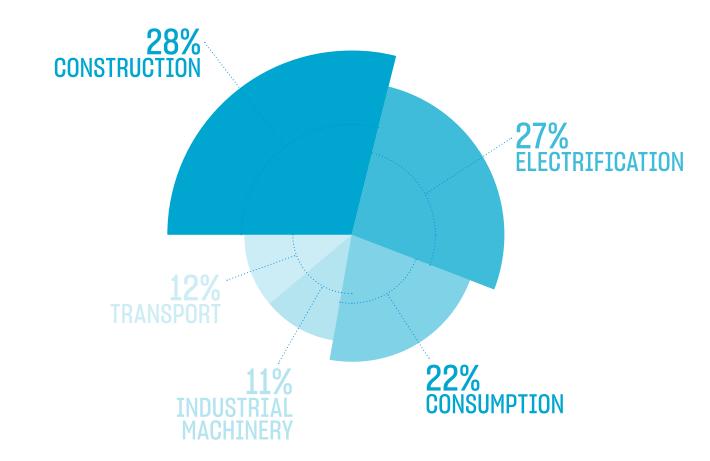
The copper industry in the EU is made up of some 500 companies, with estimated turnover of 45,000 million euros, and employs some 50,000 people (most recent data available, 2018). In addition, Europe is the world leader in terms of recycling, covering around 52% of its demand

with recycled copper. Spain's copper sector moved around 5,100 million euros and employed over 2,500 people directly and 6,380 indirectly.

Demand for copper has doubled in the past 25 years and is expected to rise even more. According to a report by McKinsey Global Institute, copper consumption will grow 43% by 2035, driven in part by green technologies like renewable energies and electric

vehicles, and by the growth of the Asian market.

In 2022, copper consumption by use was as follows:

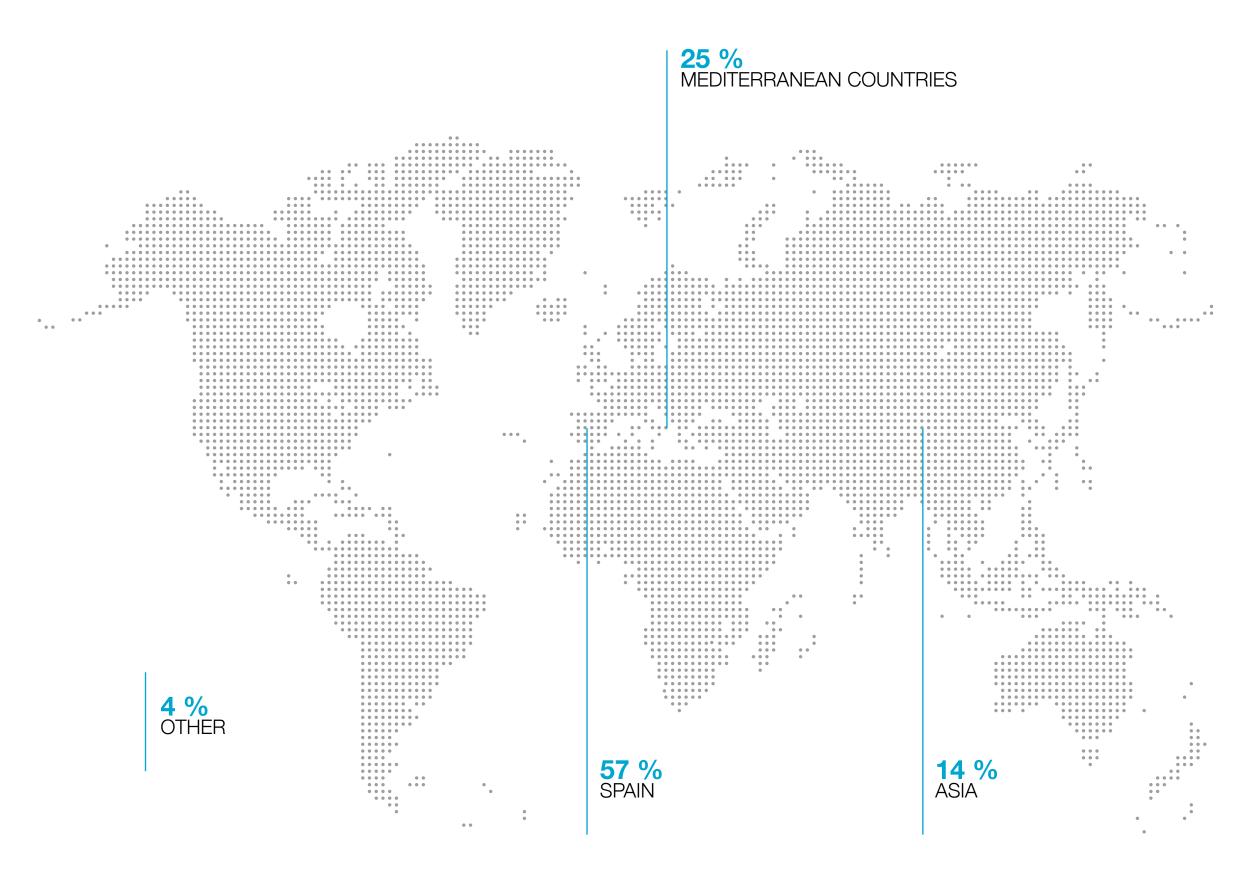


*Source: Report by McKinsey Global Institute, 2022



Regarding the Atlantic Copper market, we show the most relevant global data for sales and destinations below (data from 2022).





2.325 M€ SALES



Esg And Communication
Director

Esperanza Morillo León

The organisational structure of Atlantic Copper is shown below in the form of the top-level organisation chart, which consists of the Management Committee.

1.2 ORGANISATION AND STRUCTURE

Each Department that appears in the previous Organizational Chart is displayed at turn into lower-level Organizational Chart.

On the other hand, within the Management Committee there exist since 2021 the following Committees:

> Appointments and Remuneration Committee. Responsible of Submit to the FCX Corporate HR Department annual fixed and variable remuneration proposal for each year for the Director staff and the one not subject to a collective agreement, to submit to the Board of Administration the appointment and remuneration of personnel manager, who reported directly to the Board or to any of its members, and to give its approval to the appointments of General Directors and Directors.

Audit Committee. Its mission is to ensure the quality of the financial information of the company, in particular the Accounts Annual Re- ports and the Management Report for the year, of which it is a part the Statement of Non-Financial Information and to assist the Board of Management of Atlantic Copper in its responsibility to formulate the financial statement.

Sustainability Committee. Its main functions are guiding and approving energy and environmental policies of Atlantic Copper, define the objectives and guidelines in the field environment and decarbonisation, and supervise the action and good practices plans derived from the aforementioned policies.

The most significant data related to the size of the organisation are the following:

2021

	2021	2022
AVERAGE WORKFORCE (PEOPLE)*	<i>755</i>	769
PROPERTY, PLANT AND EQUIPMENT (M€)	168	217
TOTAL ASSETS (M€)	1.146	1.178
SALES	2.506	2.325
PROCUREMENTSOF RAW MATERIALS (M€)	2.382	2.106

*Includes Semi-retired Workers

			PRES I Javier Targ							
	GENERAL DIRECTOR (SPV, CFO &CAO) Macarena Gutiérrez Martínez		•	Compliance Officer Natalia Pérez Hormaeche		Marketing and Sales General Manager		Director of Ilurgy	General Director Sulphuric Acid Business	
Genaral Director of Organisation and H Sol Villar Abeytua	General director R Internal Audit Corporate So Responsibili Heliodoro Mariscal	and and Dat cial De ity Natalia Pé	Iffair Director ta Protection elegate	tional divis	José Jimén nd interna- ion director /ictor Rich	ez Carracedo General Direc Develo <i>Miguel Palac</i>	pment	General I Energy Tra Susta	Concepción García Carvajal Director for ansition and inability onso Álvarez	





Social Responsibility and Sustainability are in Atlantic Copper's DNA as part of a company strategy that is perfectly aligned with the needs and demands of today's society. In order to be a competitive and socially responsible company in a globalised environment, Atlantic Copper prioritises people's safety, care for the environment and innovation.

ATLANTIC
COPPER'S
PURPOSE,
VISION,
MISSION AND
STRATEGY.



PURPOSE

To provide essential metals for decarbonisation, energy transition and sustainable mobility, key objectives to ensure a better world for current and future generations.



> To continue to be a key element in Freeport's business strategy while also being a profitable enterprise capable of generating net revenue in any global economic climate.



MISSION

- To continue on the path of excellence in all areas of the company, with a special emphasis on safety and the environment.
- To give absolute priority to innovation as a crucial tool that enables the achievement of all the other objectives.
- > To be a financially profitable company, adding value to FCX while increasing our flexibility in raw materials processing and provide the Circular Economy.

Through our commitment, we aim to be a company that is:

- > ECONOMICALLY VIABLE
- > SOCIALLY BENEFICIAL
- > ENVIRONMENTALLY RESPONSIBLE





- 1 CONTINUE ON THE PATH OF EXCELLENCE WITH A SPECIAL EMPHASIS ON SAFETY.
- 2 CONTINUE REDUCING ENVI-RONMENTAL IMPACT AND ELIMINATING INTERDEPENDEN-CIES.
- CONTINUOUS IMPROVEMENT
 IN REDUCING COSTS, INCREASING PRODUCTIVITY, RELIABILITY/AVAILABILITY OF ASSETS
 AND RECOVERY OF METALS.
- 4 ATTAIN AN ELECTRICAL SUPPLY
 THAT IS 50% SELF-GENERATED
 AND DRAWN FROM RENEWABLE SOURCES IN ORDER TO
 REDUCE COSTS AND BECOME
 INDEPENDENT OF ELECTRICITY
 MARKETS AS MUCH AS POSSIBLE.

- 5 INCREASE REVENUE THROUGH BETTER CONTRIBUTION MARGINS VIA THE PROCESSING OF COMPLEX CONCENTRATES.
- 6 SIGNIFICANTLY INCREASE THE MARGIN THROUGH ACTIONS FOCUSED ON THE PROCESSING OF RECYCLED MATERIALS.
 UNDERTAKE VIABILITY STUDY APPROVED BY FCX.
- 7 FORMULATE THE HR ACTIONS
 FOCUSED ON THE EMPLOYEE
 AND THE ORGANISATION NEEDED
 TO FACILITATE THE STRATEGIC
 OBJECTIVES DEFINED.



Atlantic Copper uses a Risk Management model to identify and assess the risks which could affect the Company, as well as to establish control mechanisms and liabilities related to each of them. The model ultimately aims to provide reasonable assurance that the strategic, operational, compliance and reporting objectives will be achieved.

The company has several committees to monitor these risks.

1.5
MEDIUM
AND LONG
TERM
RISKS

Assessment and Monitoring of Sustainable Development Risks and Opportunities. Made up of people from senior management. Multidisciplinary in nature, it comprises the main management areas (safety, environment, production, legal, internal auditing, human resources, engineering, sourcing, etc.). The entire process is coordinated by the Corporate Social Responsibility Department.

Its scope comprises the risks related to the principles of the International Council on Mining and Metals (ICMM) and the Sustainable Development Goals (SDG) of the 2030 Agenda. A level is assigned to each risk element or opportunity according to a double entry matrix based on the degree of impact on multiple aspects (safety, the environment, stakeholders, legal, financial, etc.) and on the probability of occurrence.

Supplier Certification Committee. Made up of people from the company's senior management from various functional areas (marketing, legal, production, quality, environment, corporate social responsibility, finance, etc.).

Its main mission is to analyse potential raw materials suppliers in a variety of management aspects to ensure that the companies with which we establish business relationships in commercialising our raw materials are trustworthy and provide adequate performance.

Hedging Committee. Its main mission is to take the appropriate decisions to mitigate the potential effects of price fluctuations of raw materials, mainly copper, on the company.

The risk of copper pricing that is unfavourable for the company is reduced through hedging operations. Its management is led by the Marketing and Sales Department.

Credit Risk Department. Led by the Marketing and Sales and Sulphuric Acid Business Departments, its mission is to analyse the financial soundness and capacity of our potential customers to assess their ability to fulfil their business obligations in the purchase of our products.

Responsible Sourcing Committee. Its mission is to ensure responsible sourcing of raw materials (copper concentrate), following the principles included in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Responsible Sourcing of Minerals Policy established by FCX. In 2022, Atlantic Copper has certified its responsible sourcing programme with the Joint Due Diligence Standard of the Copper Mark.



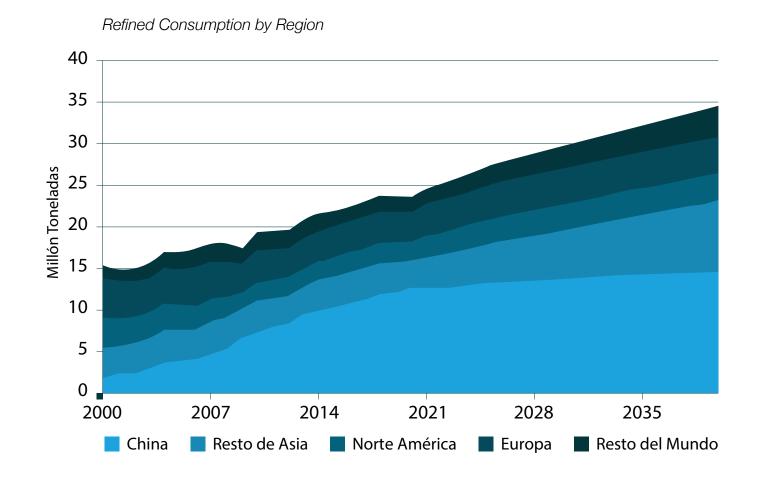
Spain and Europe are facing environmental, technological and social challenges, many of them related to the supply of raw materials that underpin their industrial activity and the quality of life of its population. Metals in general, and copper in particular, are essential to achieve the green and digital transition collected in the Green Deal, and its demand will increase.

Therefore, greater independence of copper supply, the exploitation of new polymetallic reserves, recycling, its processing and conversion into key products to meet the future demands for this metal and decarbonization goals will have an extraordinary impact on the copper value chain in Europe and in Spain.

1.6 MARKET RISKS

Metals in general, and copper in particular, are essential to achieve the green and digital transition. Europe is deficient in raw materials and also in copper, with a dependence on the outside of a 30% of its consumption. For this reason, making the most of metal reserves, recycling and a commitment to the circular economy in all production processes is essential to achieve the objectives of the Green Deal.

The outlook for the future is encouraging. Copper is fundamental for sustainable development of the world economy and will continue contributing to its growth through its use in new markets such as renewable energy, construction, digitalisation, infrastructures and electric vehicles. Attached is a table of copper consumption forecasts by world regions (Source: Wood Mackenzie).





In relation to the market of sulphuric acid, of which Atlantic Copper is the largest producer in Spain and the second-largest in Europe. Atlantic Copper has an important logistics platform that allows the company to supply the markets for this essential element for sectors such as agriculture and the pharmaceutical industry.

With respect to the risk of fluctuations in transformation costs, and, in particular, with respect to variations in the price of energy, Atlantic Copper has an Energy Management System (ISO 50001) that ensures the management of its purchase. Despite the high prices during 2022,

which have affected the entire industry, Atlantic Copper mitigates the price risk partly because of lower consumption due to the scheduled general shutdown for long-term maintenance and because it has implemented a self-consumption model, while at the same time it has signed various long-term Power Purchase Agreements (PPAs). This is why no significant impact is expected from this increase in the price of energy.

In 2022, the company has hedged the price of electricity for 51% of its consumption through self-production and long-term contracts. consumption, through self-production and long-term contracts (PPAs) for renewable sources.

General Shutdown 2022

During the period between 19 April and 24 June 2022, scheduled maintenance of the facilities at the Huelva Metallurgical

Complex was carried out as part of the cycle of scheduled shutdowns.

The planned start date for the General Shutdown was September 2021 but, due to the health situation, its start was postponed to 19 April 2022.

The budget scope of 76.19 million euros has contemplated investments of 55.94 million euros, of which 3.7% (2.1 million) corresponds to improvements, as well as the execution of preventive and corrective maintenance activities under the concept of *Extraordinary Shutdown Expenditure*, in the order of 20.25 million euros.

The budget execution has been affected by the impact of the prices of materials and consumption (Natural Gas), the total estimated expenditure being 78.39 million euros (Investment + Extraordinary Expenditure). The Natural Gas overrun amounted to 2.2 million euros.

The General Shutdown has generated a level of activity of 901.845 man-hours, 75% of which corresponds to external personnel. In terms of timetable distribution, 867 people worked on the day shift and 117 people on the night shift.

From the production point of view, the General Shutdown has meant a reduction of around 40,000 t of Cu and around 220,000 t of H₂SO₄.





<u>02.</u> REFERENCE **FRAMEWORKS**

- 2.1. FCX PRINCIPLES OF BUSINESS CONDUCT
- 2.2. ICMM SUSTAINABLE DEVELOP-MENT PRINCIPLES
- 2.3. SOCIAL RESPONSIBILITY MANA-
- 2.4. ENVIRONMENTAL MANAGEMENT SYSTEM (ISO 14001)
- 2.5. EMAS STATEMENT
- 2.6. ENERGY MANAGEMENT SYSTEM (ISO 50001)
- 2.8. HEALTHY WORKPLACE MANA-**GEMENT SYSTEM**
- 2.9. MANAGEMENT SYSTEM FOR CRIMINAL COMPLIANCE (UNE 19601) 2.10. QUALITY MANAGEMENT SYSTEM (ISO 9001)
- 2.11. ASSET MANAGEMENT SYSTEM (ISO 55001)
- 2.12. UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (ODS 2030) 2.13. AUTHORISED ECONOMIC OPERATOR (ES AEOF 16000002E4)
- 2.14. THE COPPER MARK
- 2.15. SPANISH NETWORK OF THE GLOBAL COMPACT
- 2.16 TOP EMPLOYER





<u>02.</u> REFERENCE



Atlantic Copper adheres to diverse reference frameworks within the scope of Law 11/2018, mentioned therein, as well as those of other organisations that have also developed reference frameworks in their area of application.

The reference frameworks adopted by Atlantic Copper are based on international standards and rules with broad consensus and validation at the international

Main reference frameworks used by Atlantic Copper:



Entitled Strength in Values, our Principles of Business Conduct (PBC) represent the culture and commitment of Freeport-McMo-Ran (FCX) to doing what is right. Designed to help guide all of us-from top-level management to entry-level employees-the PBCs reflect how we do business.

2.1.
FCX
PRINCIPLES
OF BUSINESS
CONDUCT

As an FCX company, Atlantic Copper assumes the commitments established in the FCX Principles of Business Conduct as its own.

The Values that inspire the BCPs give who we are and how we work, all of us, everywhere, every day, and they are summarised in:

SAFETY

RESPECT

COMMITMENT

INTEGRITY

EXCELLENCE

In addition, the PBCs complement each other and are developed in the following specific documents:

- > Anti-corruption policy
- > Anti-corruption guidelines
- > Policy on the community
- > Conflict interest guide
- > Environmental policy
- External communication policy
- > Fair competition guidelines
- > Global supply chain policy
- > Human rights policy
- Insider trading policy
- Business partner code of conduct

- Mis end-user policy
- Occupational health and safety policy
- Responsible minerals sourcing policy
- Harassment prevention protocol
- Conflict of interest guidelines
- Records management policy and records retention programme on the fm website
- External communication policy

These documents are available in FCX's corporate governance section: (https://fcx.com/about/our-view-on-governance#-businessethicspolicies)





Participation in ICMM requires adherence to a commitment based on 10 principles. These represent a framework of exemplary practices that favour sustainable development in the mining and metallurgical industry:

2.2
SUSTAINABLE
DEVELOPMENT
PRINCIPLES OF THE
ICMM
(INTERNATIONAL
COUNCIL ON MINING
& METALS)

In 2020, Atlantic Copper submitted to an audit by an independent third party (Corporate Integrity) of compliance with the performance expectations of the ICMM Principles (PEs). As a result of this independent assessment and analysis of other areas of its management, in December 2020, the company was awarded the Copper Mark, an accreditation that demonstrates to the London Metals Exchange and our stakeholders compliance with the 32 multi-functional criteria in the exercise of responsible production.

- 1 APPLY ETHICAL BUSINESS
 PRACTICES AND ROBUST
 SYSTEMS OF CORPORATE
 GOVERNANCE
- 2 INTEGRATE SUSTAINABLE DEVELOPMENT IN CORPO-RATE DECISION-MAKING PROCESSES
- RESPECT THE HUMAN RIGHTS
 AND THE INTERESTS, CULTURES, CUSTOMS AND VALUES
 OF OUR EMPLOYEES AND THE
 COMMUNITIES AFFECTED BY
 OUR ACTIVITIES
- 4 IMPLEMENT RISK-MANA-GEMENT STRATEGIES AND SYSTEMS BASED ON VALID INFORMATION AND SOUND SCIENCE
- 5 PURSUE CONTINUOUS IMPRO-VEMENT IN OUR HEALTH AND SAFETY PERFORMANCE

- 6 PURSUE CONTINUOUS IMPROVEMENT IN OUR ENVI-RONMENTAL PERFORMANCE
- 7 CONTRIBUTE TO THE
 CONSERVATION OF BIODIVERSITY AND INTEGRATED
 APPROACHES TO LAND-USE
 PLANNING
- 8 FACILITATE AND SUPPORT THE DESIGN, USE, RE-USE, RECYCLING AND RESPON-SIBLE DISPOSAL OF OUR PRODUCTS
- 9 CONTRIBUTE TO THE SOCIAL, ECONOMIC AND INSTITUTIO-NAL DEVELOPMENT OF HOST COUNTRIES AND COMMUNI-TIES
- 10
 APPLY MECHANISMS FOR
 EFFECTIVE, TRANSPARENT
 AND VERIFIABLE REPORTING,
 COMMUNICATION AND PARTICIPATION WITH OUR STAKEHOLDERS



Atlantic Copper has developed, implemented and certified, and keeps up-to-date, a Social Responsibility Management System (SRMS) applicable to the entire company which meets the IQNet SR10 standard developed by IQNet Association-The International Certification Network.

2.3
SOCIAL
RESPONSIBILITY
MANAGEMENT
SYSTEM
(IQNET SR10 - ISO
26000)

Atlantic Copper's SGRS was certified by AENOR according to the IQNet SR10 standard in 2014, and this certification has remained in force since then.

To continue progressing in the area of Social Responsibility and Sustainability, in 2019, Atlantic Copper began participating in an external evaluation according to the Vigeo Eiris model (currently Moody's ESG Solutions), based on the main worldwide reference frameworks for environmental. social and corporate governance (ESG) compliance. The results were very satisfactory, and the Company undertook the corresponding actions to address the improvement opportunities identified, having achieved an overa-Il rating of Advanced (highest

possible level in the external evaluation conducted in 2022, which has been consolidated since 2021, increasing the score (from 64 to 66) and having moved up three position in comparison with the sector, 18 positions in Europe and 27 worldwide.

To further reinforce Atlantic Copper's commitment to Social Responsibility, in October the company joined the Spanish Global Compact Network, the world's largest corporate sustainability initiative, having submitted its progress report in October 2022.

2.4
ENVIRONMENTAL
MANAGEMENT
SYSTEM
(ISO 14001)

Atlantic Copper has developed, implemented and certified, and keeps up-to-date, an Integrated Environmental Management System (IEMS) applicable to its facilities in Huelva which complies with the international standard UNE-EN ISO 14001 Environmental Management Systems. Requirements with guidance for use. This International standard specifies the requirements of an Environmental Management System for protecting the environment and responding to changing environmental conditions in balance with socio-economic needs.

Atlantic Copper's IEMS was certified by AENOR according to the *UNE-EN ISO 14001* standard in 1999, and this certification has been kept current.







2.5 EMAS STATEMENT

Since 1997, Atlantic Copper has prepared Annual Statements of its Environmental Conduct as established in the Environmental Management and Auditing System (EMAS).

The additional EMAS requirements with respect to the UNE-EN ISO 14001 international standard are integrated into Atlantic Copper's IEMS (2.4). We comply with these requirements through yearly publication of our Environmental Statement, which is certified by an accredited environmental verifier.





Atlantic Copper has developed, implemented and certified, and keeps up-to-date, an Energy Management System (EMS) applicable to its facilities in Huelva which complies with the international standard *UNE-EN ISO 50001* Energy Management Systems. Atlantic Copper's EMS was certified by AENOR according to the *UNE-EN ISO 50001* standard in 2011, and this certification has been kept current.

2.6
ENERGY
MANAGEMENT
SYSTEM
(ISO 50001)

2.7
SAFETY
MANAGEMENT
SYSTEM
(ISO 45001)

Atlantic Copper has developed, implemented and certified, and keeps up-to-date, an Integrated Occupational Risk and Accident Prevention System (IORAPS) applicable to the entire company which complies with the policies established in this area by FCX and current laws.

Regarding the preventive measures, we have an In-house Prevention Service that is recognised and registered with the four specialties, as well as our own 24-hour Medical Service.







Atlantic Copper has developed and implemented and certified, and keeps up-to-date, a Healthy Workplace Management System (HWMS) applicable to the entire company that complies with AENOR's Healthy Workplace Model. AENOR's Healthy Organization Model responds to the Model proposed by the World Health Organization (WHO) for a

2.8
HEALTHY
WORKPLACE
MANAGEMENT
SYSTEM

Healthy Work Environment in Organizations.

Atlantic Copper's *SIGOS* is based on the Identification, Evaluation and Control of the Factors that influence the Healthy Work Environment, considering: Physical Work Environment, Psychosocial Work Environment, Health Resources, and Community Involvement. Atlantic Copper's *SIGOS* also includes the necessary Policies and Procedures for the compliance with applicable requirements, including legal requirements.

Although the HWMS is mainly aimed at the people who work for the company, promotion of good health is one of Atlantic Copper's general strategic lines, which is also aimed at the rest of the

stakeholders to the extent that we are able to influence them. The implementation of Atlantic Copper's *SIGOS* is monitored through:

- The follow-up and measurement activities foreseen in the SIGOS itself.
- > Annual Internal Audits of the complete SIGOS.
- > Annual external audits of the SIGOS by AENOR.





The HWMS was certified by AENOR according to AENOR's Healthy Workplace Model in 2018, and this certification has been kept current.

This certification has been in force since then and has been adapted to the new AENOR's Healthy Organization Management Healthy Organization Management System dated 11/21/2021. The Healthy Organization Policy and the Certificate of Conformity issued by AENOR by AENOR, are available on its website (www. atlanticcopper.es).



Atlantic Copper has developed and implemented a *Criminal Compliance Management System* for the purpose of continuously validating application of the established Criminal Compliance Policy.

Atlantic Copper's *Criminal Compliance Management System* was certified in 2019 by AENOR according to the standard *UNE 19601 Management Systems for Criminal Compliance.* Requirements with guidance for use. This certification has been maintained.

2.9

MANAGEMENT
SYSTEM FOR
CRIMINAL
COMPLIANCE
(UNE 19601)



2.10 QUALITY MANAGEMENT SYSTEM (ISO 9001)

Atlantic Copper has developed, implemented and certified, and keeps up-to-date, a Quality Management System (QMS) applicable to the entire company which complies with the international standard UNE-ENISO 9001 Quality Management Systems.

Atlantic Copper' QMS was certified by AENOR according to the *UNE-EN ISO 9001* standard in 1994, and this certification has been kept current.



2.11
ASSET
MANAGEMENT
SYSTEM
(ISO 55001)

Atlantic Copper has developed, implemented and certified (in 2019), and keeps up-to-date, an Asset Management System (AMS) applicable to the entire company which complies with the international standard UNE-ISO 55001 Asset Management. Management systems.







Atlantic Copper is committed to the set of global goals for eradicating poverty, protecting the planet and ensuring prosperity formulated by world leaders in the framework of the UN on 25 September 2015 as part of

a new sustainable development agenda for implementation over in the next 15 years by governments, the private sector, civil society and individuals.

Atlantic Copper considers the 2030 SDGs in its strategies and actions in conjunction with the rest of the reference models indicated above. Atlantic Copper integrates the 2030 SDGs into its system for analysis and assessment of Sustainable Development risks and opportunities according to the FCX SD Risk Register Process.

Additionally, Atlantic Copper maintains a record of actions

that are strategically aligned with the 2030 SDGs.

Chapter 8 of this document indicates the main relationships of the different sections of this report to the 2030 SDGs, as well as other initiatives aligned with same.

2.13
AUTHORISED
ECONOMIC
OPERATOR
(ES AEOF
16000002EY)

Atlantic Copper is certified as an Authorised Economic Operator with Customs Simplification/Security and Safety (AEO) for its facilities in Huelva and Madrid.

The AEO certificate is a status awarded by the different community customs authorities to companies that carry out international trade operations. It identifies its holder as a reliable partner for customs operations. It gives its holder proof that it complies with rigorous security criteria and controls and that it can, therefore, be considered an efficient and trustworthy trade partner.



2.12 UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (2030 SDGS)



<u>THE</u>

MARK

The Copper Mark is an initiative arising from the International Copper Association (ICA) and the input of external stakeholders. It subsequently became an independent organisation that establishes a rigorous global compliance system based on ESG principles and with a complete set of environmental, social and governance criteria. It is the first and only system developed specifically for the copper

industry, and it enables companies in the sector to accredit to their customers, suppliers, investors, final manufacturers and other stakeholders a responsible production process aligned with the SDGs (2.12).

In the future, the Copper Mark has been admitted by the London Metal Exchange as a means of demonstrating implementation of a Responsible Sourcing Programme aligned with the OECD guidance, which is a requirement for products to be registered on same.



Atlantic Copper was the first European smelting and refinery that has received this seal of approval and was among just five companies in the world to have achieved it up to the date it was granted (10/12/2020).

To do so, the company passed the Copper Mark Assurance Process, a voluntary programme open to all members of the copper industry that enables the producer to express its commitment to compliance with the industry's sustainability standards in its operating practices. The evaluation is based on 32 criteria in a cycle structured in five phases: commitment, self-assessment, independent assessment, improvement plan and re-assessment every three years.

In 2022 the Joint Due Diligence Standard assessment has been successfully completed (fully meets / 100% compliance) to accredit compliance with the OECD criteria in this matter.



2.15

NATIONS

GLOBAL COMPACT

(SPANISH NETWORK).

In October 2021, Atlantic Copper joined the Spanish Network of the United Nations Global Compact, the world's largest CSR initiative, which to date has united more than 13,000 entities in 160 countries for the promotion of the Sustainable Development Goals (SDGs), as a signatory partner. Following in Freeport-McMo-Ran's footsteps, the company

has voluntarily committed to consolidate its strategies and operations with the ten universal principles on human rights, labor standards, environment and anti-corruption.

The implementation and evaluation of the ten principles is materialized through a Progress Report to be carried out annually, the year following the date of adherence to the United Nations Global Compact.

Atlantic Copper submitted its progress report in October 2022, having been declared compliant

by the Global Compact.



All certificates and documents regarding management systems are available on our website (www.atlantic-copper.es).



Top Employers Institute is the global authority, which has validated for the second consecutive year the excellence of the HR policies implemented in the Company with an impact on the professional environment. Founded 30 years ago, Top Employers Institute has certified more than 2,053 organisations in 121 countries. Certified Top Emplo-

EMPLOYER

yers organisations create a positive impact on the lives of more than 9 million employees around the world.

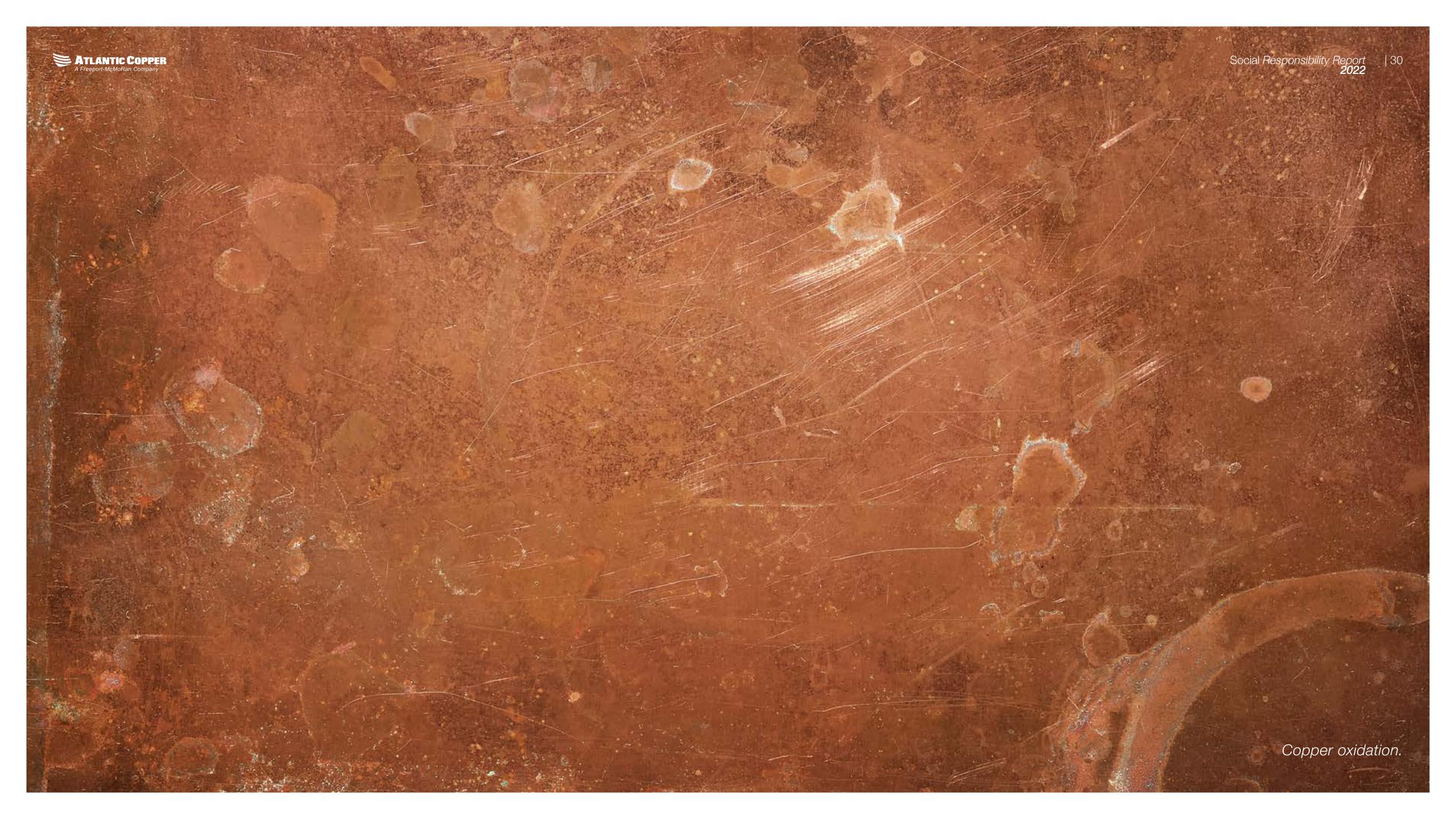
The Top Employers Institute
Certification Programme is an
objective, independently audited
process that examines human
resource policies in organisations.

To obtain the seal, it is necessary to pass four stages: survey, validation, results and certifica-

tion. The most important of all is to respond to the six domains covered by the *HR Best Practices Survey*.

These major headings are divided into 20 different dimensions such as people strategy, digitalisation, working environment, leadership, talent acquisition, learning, sustainability, diversity and inclusion, among many others.





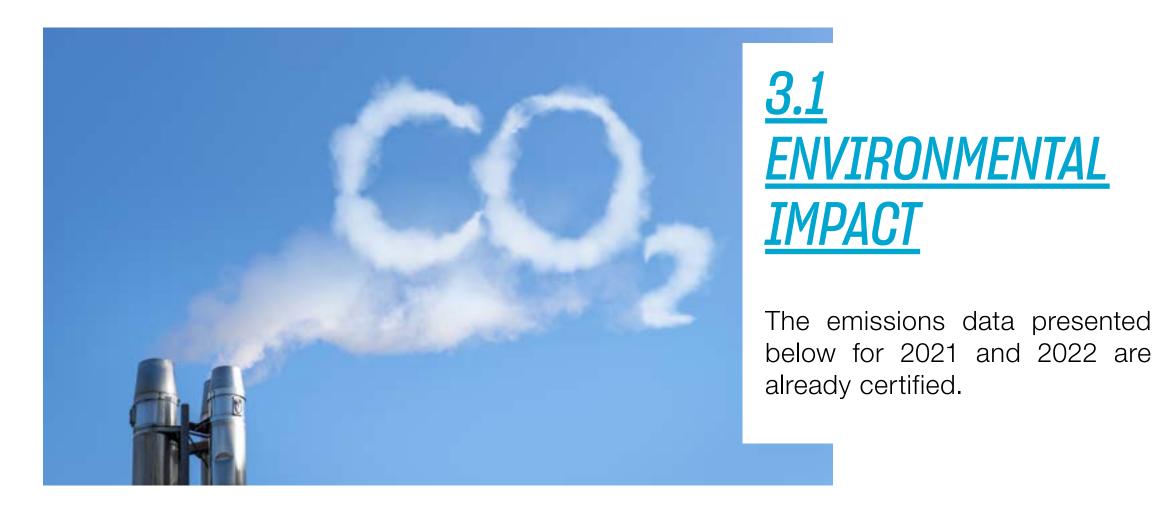


<u>03.</u> ENVIRONMENT / **RESULTS**





O3. ENVIRONMENT / RESULTS



3.1.1 CARBON EMISSIONS

The main greenhouse gases emitted by Atlantic Copper include CO_2 , CH_4 , N_2O and certain hydrofluorocarbon (HFC) compounds.

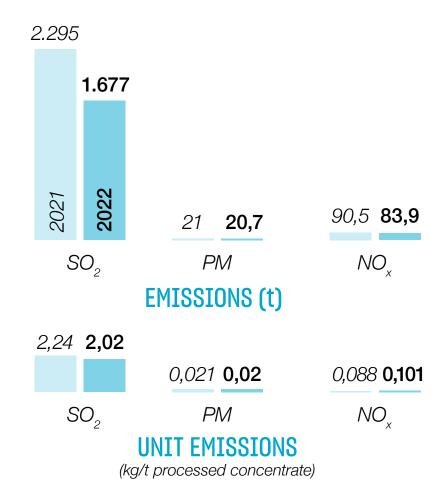




3.1.2 EMISIONES DE CARBONO

Atlantic Copper Atlantic Copper continuously monitors 90% of its SO₂ emissions. For all other emissions, which have low environmental impact, in accordance with current legislation, measurements are taken annually or biannually by collaborating entities in the area of environmental quality (ECCAs in their Spanish acronym). Regular self-monitoring is also done internally.

The emissions data for SO_2 , Particulate Matter (PM) and NO_X , well below the limits in the current legislation, are shown below.



It is worth highlighting the 10% reduction in unit SO₂ emissions (kg SO₂/T concentrate ratio), as a result of the investments made in recent years. Thus, in 2021 the project to reduce emissions at the Electric Furnace bleeders was completed, and in 2022 the project to reduce emissions at the Acid Plants was completed. On the other hand, the increase in the unit ratio in NO_x (nitrogen oxide) emissions is due to fuel consumption per tonne of concentrate processed, associated with the heating of the equipment during the General Shutdown for maintenance carried out in 2022, during which no concentrate was processed.

Atlantic Copper carries out numerous actions to comply with its management the waste hierarchy, including the following:

- Application of new technologies for the Prevention and minimisation of waste
- Recycling and reuse of waste through authorised waste managers



<u>3.2</u> WASTE

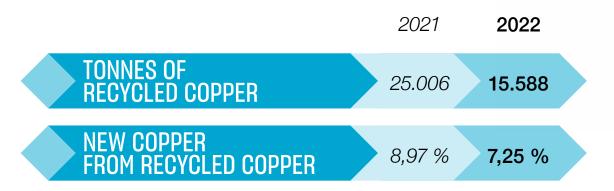
The total and unit increase of waste is due to the General Maintenance Shutdown carried out in 2022.



<u>3.2.1</u> RECYCLING

Atlantic Copper contributes significantly to the copper recycling, so that it can be reused indefinitely. Recycled products today come from industrial waste (scrap from production processes in the copper value chain and from products that have reached the end of their useful life).

Atlantic Copper introduces this secondary copper as a raw material in its production process, where it is mixed with copper of primary origin.





In 2022, the Circular Project was approved, consisting of the treatment of some 60,000 t/year of metals from disused electrical and electronic equipment. It is scheduled to start up in 2025.



<u>3.2.2</u> WASTE **RECOVERY** AND DISPOSAL

As mentioned in the previous section, Atlantic Copper contributes significantly to the recycling of copper for its reuse. As a strategy for the prevention and minimization of waste the implementation of new technologies, which not only avoid the generation of waste, but also promote its transformation, into recoverable materials.



As mentioned in the previous section, at Atlantic Copper's Huelva Metallurgical Complex, there is a company canteen, managed by an entity specialized in collective catering, in which, under normal conditions, more than 130 meals a day are provided, subject to the regulations for collective canteens and to the food utilization and waste reduction policies. In addition, within the framework of the Healthy Organization Management System (3.8), Atlantic Copper's Medical Service has set up the Nutritional School, which provides guidelines for healthy and responsible eating.

3.2.3

FOOD WASTE

COMBAT ACTIONS





Two types of water are consumed at the Atlantic Copper facilities in Huelva:

- Drinking water for use in offices, laboratories, changing rooms, the medical service and cafeterias
- > Fresh or sweet water for various plant processes and replenishment of cooling water. Some of this water is demineralised for use as boiler water for steam production

3.3 WATER CONSUMPTION As the continuation of the Red_Scope (Recovery of Effluent Discharge for Sustainable Copper Processing in Europe) pilot test, financed by the EIT Raw Materials European initiative, the "Elimination of unified discharge and recirculation of treated water" project was approved at plant scale for a total of 12.6 million euros. Construction has started in 2022. The new facilities of this project are schedu-

led to be commissioned up by the end of 2023 and will make it possible to reuse as fresh water the 90% of the current discharge from the process and reduce by 25% the consumption of fresh water.

	2021	2022	2021	2022	
	WATER CONS	SUMPTION (m³)	WATER CONSUMPTION (m³/t concentrate processed)		
DRINKING WATER CONSUMPTION	43.429	43.935	0,042	0,053	
FRESH OR SWEET WATER CONSUMPTION	1.884.233	1.563.563	1,841	1,884	
TOTAL WATER CONSUMPTION	1.927.662	1.607.498	1,883	1,937	

The following table shows the evolution of water consumption over the last two years:



3.3.1 RAW MATERIALS CONSUMPTION

The following table shows the evolution of raw materials consumption over the last two years:

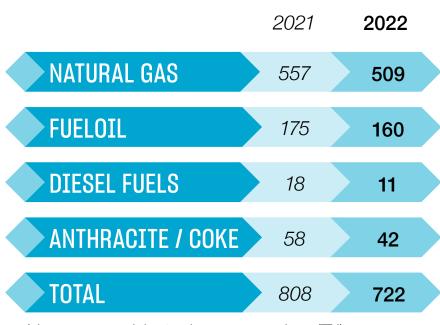
	2021	2022	
CONCENTRATE	1.023.630	829.765	
COPPER TO BE RECYCLED	29.181	18.754	
FLUXES	133.857	96.428	
LIME	22.286	19.411	
TOTAL	1.208.954	964.358	

Raw materials consumption (t)

3.3.2 DIRECT AND INDIRECT ENERGY CONSUMPTION

Atlantic Copper has an Energy Management System (EMS) that complies with the *UNE-EN ISO 50001* standard. This system obtained certification for the first time in 2011-the first copper smelter, the seventh major energy consumer in Spain and the first in Andalusia to do sowhich

placed us on the forefront and established us as a benchmark. The following table shows the evolution of energy consumption over the last two years.



Non-renewable fuel consumption (TJ)



3.3.3 ENERGY EFFICIENCY

Energy efficiency improvements at Atlantic Copper are channelled through the EMS.

The strategy that led us to decision-making within the framework of the EMS is based on:

- A global vision of energy management, which includes benchmarking, theoretical studies and a general review of the facility's mass balance and overall energy
- Energy flow map, characterising losses as being of three types: transformation, distribution and process
- Classification of the tools and technologies available on the market

As a result of the above, the Company has defined the energy strategy and its corresponding Action Plans, with the completion of numerous projects, involving both management changes and investment projects, with overall efficiency improvements (specific consumption of total energy per unit of raw material processed) of 22% in 10 years, from 2012 to 2022, and 35% since 2000.

During 2022 there has been a General Maintenance Shutdown, the longest in time and with the largest economic investment in the Company's history. This shutdown has served to repair and return the energy efficiency of most of the processes to their design values.

The most important projects in the area of energy efficiency are the following, executed in 2021:

- Installation of energy recovery boilers in acid plant 1, for steam production and transformation into electric power.
- Installation of new burners with lower fuel oil consumption.

- Plant operational control improvements:
- Increased waste heat recovery from the electric furnace.
- Optimization of the seawater pump drive to reduce power consumption.
- Optimization of gas consumption in refining furnaces.

Specific energy consumption, total power purchased / raw material processe



E0 Indicator: Total unit energy consumption

3.3.4 USE OF RENEWABLE ENERGIES Atlantic Copper has signed four long-term power purchase agreements (PPA) through Fortia Energía, a power purchasing platform for large industrial consumers, of which it is a founding member. These agreements boost the penetration of renewable energy in Spain. For Atlantic Copper, the importance of these agreements lies in the fact that the energy is supplied to the Huelva Metallurgical Complex will comes from renewable sources.

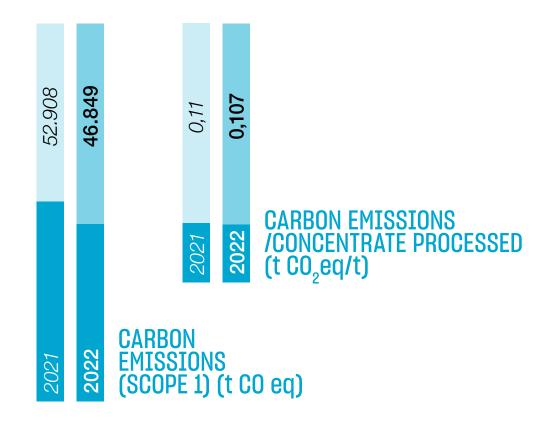
These contracts are, in fact, Atlantic Copper's first step in its strategy to achieve a mostly renewable electricity supply. In 2022, the consumption of electricity from renewable sources and high-efficiency cogeneration reached 51%.



3.4.1 GREENHOUSE GASES (GHG)

As mentioned in section 3.1.1, the main greenhouse gases emitted by Atlantic Copper include CO₂, CH₄, N₂O and certain hydrofluorocarbon (HFC) compounds.

3.4 CLIMATE CHANGE



3.4.2

MEASURES

FOR ADAPTING

TO THE

CONSEQUENCES

OF CLIMATE

CHANGE

As part of the environmental impact study of its CirCular project, Atlantic Copper conducted a study in 2021 of its vulnerability to climate change risks, covering current and future climate conditions. In addition, FCX conducted a global scenario analysis of all its operations and has carried out an additional analysis in 2022. Our assessment of these risks will be updated periodically over time to ensure that adaptation measures are suffcient.

Of all the analyzed risks reduced precipitation is the most likely event. Therefore, as a measu-

re to adapt to the consequences of climate change, in 2022 has begun construction of the "Reduction of unified discharge and recirculation of treated water" project on a plant scale for 12.6 million euros.

The new facilities of this project will allow 90% of the current process discharge to be reused as fresh water, thus reducing dependence on external water supply. The plant is scheduled to be commissioned by the end of 2023.

In the same vein, Atlantic Copper plans to increase its fresh water storage capacity by 77% through a project to be executed between 2022 and 2023.



3.5 BIODIVERSITY

3.5.1

MEASURES FOR

PRESERVING OR

RESTORING

BIODIVERSITY

In line with the philosophy of our shareholder, Free-port-McMoRan, Atlantic Copper considers it essential to ensure that social and economic progress is compatible with protection of nature and of people, based on respect for the right of future generations to enjoy a healthy environment and a habitable planet and in accordance with the principle of sustainability. This is evidenced in an extremely strict *Environmental Policy*, designed using strategies based on continuous improvement, which establishes concrete objectives in an ongoing effort to reduce the impact of the production processes on the environment and supported by the application of the best available technologies at all times.

The commitments described in the *Environmental* activities and workshops based *Policy* include that of considering the values of areas on content on the environment with cultural significance, biodiversity or ecological in general and on *the Marismas*

qualities, as well the potential for resource development, alongside the social and economic benefits. For that reason, Atlantic Copper, through its foundation, has maintained a collaboration agreement since 2011 with the Council for the Environment of the Regional Government of Andalusia to promote environmental education and awareness-raising in Huelvan society regarding its natural surroundings.

Within the framework of this agreement, in 2022, as it has been doing since 2012, the Marismas del Odiel Nature Area, declared a Biosphere Reserve by UNESCO, the "School for Explorers" project was carried out in the format of a day camp. The programme was implemented during the summer months in the Nature Area and its facilities for public use. In this context, children from 4 to 14 years of age participated in recreational and educational activities and workshops based on content on the environment

del Odiel in particular. Some of the children's activities included: identification and following of tracks and signs, introduction to orienteering, observation and recognition of fauna and birds, crafts using natural and recycled products, and the construction of a forest plant nursery.

This edition marked the eleventh anniversary of the project (in force since 2012), with a participation of 435 minors, who occupied 840 places, for a total of 4.200 stays. Thus, since the beginning of the project, more than

4.660 schoolchildren have taken part, with a total of 8.157 places occupied, for a total of 40.785 stays. In addition, as part of this same collaboration agreement, the Atlantic Copper Foundation also carries out other activities at the Marismas del Odiel N. A., such the project "My marshland, my school", aimed at schoolchildren from the municipalities bordering the Natural Park. In 2022, 30 centers participated (1.260 students). All this, with the conviction that only what is known is respected, and only what is respected is preserved.

This program was carried out during the 2020-2021 academic year.

As a result of the experience with the *P. N. Marismas del Odiel*, Atlantic Copper has led the SISTEM Project, consisting of the development of a best practices manual on the coexistence of industrial environments and natural sites, which will make it possible to replicate in other similar areas in the EU, the model of integration with biodiversity that has been developed.

In 2022, the Atlantic Copper Foundation has launched "Copper Girl", an original initiative in the form of a comic to raise awareness among children about the importance of recycling and caring for the planet.







<u>04.</u> STAFF

4.1. POLICIES AND PROCEDURES

4.2. PREVENTION OF OCCUPATIONAL RISKS

4.3. OCCUPATIONAL HEALTH

4.4 KEY RESULTS
4.4.1. ABSENTEEISM
4.4.2. WORK-LIFE BALANCE

4.5. ACCIDENTS AT WORK
4.5.1. OCCUPATIONAL DISEASES

4.6. LABOUR RELATIONS
4.6.1. INFORMATION, CONSULTATION AND NEGOTIATION
4.6.2. COLLECTIVE BARGAINING AGREEMENT COVERAGE

4.7. HOURS OF TRAINING
4.7.1. EMPLOYMENT PROMOTION MEASURES

4.8. DIVERSITY MANAGEMENT





<u>04.</u> STAFF

The human resources management policy is established in our Principles of Business Conduct (2.1). In addition to our values, which explain "who we are and how we work, all of us, everywhere, every day", these establish that:

4.1
POLICIES
AND PROCEDURES

Our employees are our greatest strength. Ensuring a safe and healthy workplace where everyone is treated fairly and with respect is a high priority at FCX. We operate in regions of varying ethnic, religious and cultural backgrounds and are often the largest employer in local communities. The diversity and various perspectives of our workforce make us stronger.

This policy is confirmed by the award of Top Employer accreditation (2.16), achieved in 2022 and validated for 2023.



4.2 PREVENTION OF OCCUPATIONAL RISKS

Atlantic Copper has established its Labor Risk Prevention Policy as a key part of its Integrated System of Prevention of Occupational Risks and Serious Accidents (SGPRLAG), which complies with the requirements established in complies with the requirements established in Law 31/1995, Royal Decree 840/2015, and the ISO 45001 standard (2.7).

In accordance with the requirements established in this respect and the corresponding applicable procedures, Atlantic Copper establishes annual Preventive Objectives and the corresponding Preventive Activity Programs to achieve them. Both Objectives and Programs are monitored periodically and evaluated at the end of the established deadlines.

4.3 OCCUPATIONAL HEALTH

Over the years, Atlantic Copper has made numerous and continuous improvements in occupational health. improvements carried out by Atlantic Copper, planned and evaluated according to the applicable documented procedures of the SIGOS.

SIGOS, highlighting as an example:

- Health campaign "nutritional school".
- > Health campaign "back school".
- Health campaign "take care of yourself".
- Health campaign to stop smoking.
- "Clinical work history" project.



The distribution of the workforce, broken down by age and gender, for 2021 and 2022 (data to 31 December) is shown below.

<u>4.4</u> <u>KEY RESULTS</u>

JULIU		20.	21		2022				
	<30	30-50	>50	TOTAL	<30	30-50	>50	TOTAL	
WOMEN	14	93	23	130	18	91	27	136	
MEN	33	408	181	622	34	420	184	638	
TOTAL	47	501	204	752	52	511	211	774	

Number of Atlantic Copper employees by contract type (permanent/temporary/full-time/part-time), segmented by gender for 2021 and 2022 (at 31 December).

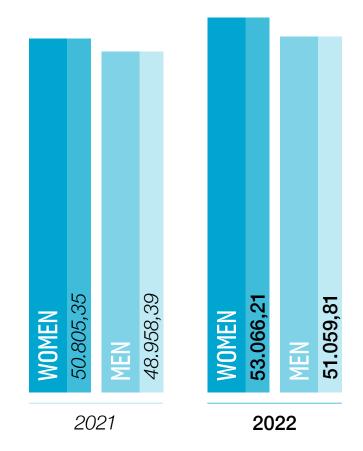
			2021			2022			
		WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL		
FULL-TIME	PERMANENT	87	486	573	109	546	655		
EMPLOYEES	TEMPORARY	26	86	112	17	33	50		
PART-TIME	PERMANENT	17	50	67	10	59	69		
EMPLOYEES	TEMPORARY	-	-	-	0	0	0		
	TOTAL	130	622	752	136	638	774		

Distribution of the workforce by professional categories (Social Security Contribution Categories), segmented by gender for 2021 and 2022 (at 31 December).

	20	021	2022		
	WOMEN	MEN	WOMEN	MEN	
ENGINEERS AND GRADUATES	50	71	58	79	
TECHNICAL ENGINEERS	26	83	30	96	
ADMINISTRATIVE MANAGERS	11	12	9	14	
UNQUALIFIED ASSISTANTS	4	68	4	61	
ADMINISTRATIVE OFFICERS	30	34	18	14	
AUXILIARY EMPLOYEES	4	19	3	24	
SKILLED WORKERS	5	335	13	344	
TOTAL	130	622	136	638	

The average number of employees in 2021 was 755, while in 2022 it was 769.





Average total annual remuneration (in euros) of Atlantic Copper employees.

4.4.1 ABSENTEEISM

Annual absenteeism (accumulated data at December) for 2021 and 2022. In 2020, half of the absenteeism percentage was due to the effects of COVID -19.

4.4.2 WORK-LIFE BALANCE

Putting into practice one of our values, the focus on people, and as evidence of the Company's unflagging commitment to encouraging a balance between personal life and working time, we took the initiative of granting an additional 2 weeks of maternity and paternity leave, bringing the total time in 2018 to 20 and 7 weeks, respectively.



Paternity leave at Atlantic Copper since 2021 is 18 weeks, 16 by law plus2 additional weeks granted by the Company.

In 2022, due to the health crisis resulting from COVID-19, family circumstances were also taken into consideration in telecommuting and flexible working hours.

	SICKLEAVE HOURS	ACCIDENT HOURS	THEORETICAL HOURS	ABSENTEEISM (S+A)
2021	34.798	10.960	1.113.357	4,11%
2022	47.249	11.683	1.216.039	4,85%



Below we present the data and rates for accidents in 2021 and 2022, segmented by gender.

4.5
ACCIDENTS
AT WORK

⁄S			
	CD ADCENICE	CD	

	HOURS	WORKFORCE	WITH ABSENCE	W/O ABSENCE	WORKDAYS LOST	GENERAL FR	SR ABSENCE	SR	IR ABSENCE	GENERAL IR
WOMEN	192.392	113	1	-	108	5,20	5,20	0,56	7,69	7,69
MEN	920.526	572	8	17	414	27,16	8,69	0,45	12,86	40,19
TOTAL	1.112.918	685	9	17	522	23,36	8,09	0,47	11,97	34,57

ACCIDENTES

2021

2022

	HOURS	WORKFORCE	ACCIE WITH ABSENCE	DENTES W/O ABSENCE	WORKDAYS LOST	GENERAL FR	SR ABSENCE	SR	IR ABSENCE	GENERAL IR
WOMEN	200.326	131	0	0	0	0	0	0	0	0
MEN	912.592	625	5	17	274	24,11	5,48	0,30	8,00	35,20
TOTAL	1.112.918	756	5	17	274	19,77	4,49	0,25	6,61	29,10

Note 1: Does not include in itinere accidents, following recommendation NTP 1 of the INSHT.

Note 2: Does not include the telecommuting hours of partial retirees.

FR: Frequency Rate = No. of accidents per million hours worked

SR: Severity Rate = No. of workdays lost for every 1000 hours worked.

IR: Incidence Rate = No. of accidents for every 1000 workers.

The workforce calculations are "full-time equivalent" employees, the result of dividing the real number of hours worked by the annual number of working days stipulated in the Agreement. Therefore, they do not necessarily match the average workforce or workforce data at 31/12 that appear in other sections.

4.5.1 OCCUPATIONAL DISEASES

Below we present the data for occupational diseases in 2021 and 2022, segmented by gender.

	2021	2022	
WOMEN	0	0	
MEN	0	0	
TOTAL	0	0	

Neither in 2021 nor in 2022 were any occupational diseases identified among Atlantic Copper personnel.





Atlantic Copper has a Work Council made up of 17 legal representatives of the workers. Its last election was held in December 2022. Likewise, Atlantic Copper has three union sections: USO, UGT and CC.OO., which, in turn, contribute two union delegates per section.

Following the termination of the 6th Collective Agreement for the Atlantic Copper Metallurgical Complex, in November 2019, a new text was negotiated and

<u>4.6</u> **LABOUR** RELATIONS

> a negotiating table was set up. Negotiations were interrupted due to the Covid-19 pandemic and the successive states of alarm that took place during 2020, resuming during the months of June and July 2020. In accordance with the usual practice of not altering the vacation of trade union rights.

period of the workers, the negotiations were halted during the month of August. From September until the end of the negotiation, reflecting the desire of both parties to reach an agreement as quickly as possible, meetings were held on a weekly basis, which finally led to the signing of the 7th Collective Agreement on October 17, 2021. The duration of the 7th Collective Agreement has a fixed duration of 3 years (2020-2022), and the Social Part proceeded to denounce it in November 2022. As a result of this denunciation, the negotiating table for the future 8th Collective Bargaining Agreement for CMH was set up on 30 December 2022.

The 7th Collective Agreement, currently in ultra vires, like its predecessor, formalises several forums for social dialogue. Firstly, it contains the basic regulation of the Joint Committee, quintessential organ for the interpretation of this, and in parallel, dedicates its Chapter IX to the enshrinement

It also provides for the existence and functioning of a Job Evaluation Commission, of bipartite and parity composition, which establishes the description and level of the job positions of the personnel subject to the Agreement, whether these are newly or face technical/functional evolutions. In the text of the VII Agreement, it has been agreed to adapt this assessment to the principles of equality, non-discrimination and gender perspective, will be carried out by the Commission for the Adaptation of the Occupational Classification, as provided for in art. 7 of the current collective agreement.

This Agreement also provides for quarterly meetings, where Human Resources indicators (staff, hiring, working hours, absenteeism...) and results are reported and discussed, and the economic-financial results of the company and the parent company.

Likewise, an annual meeting is scheduled in order to learn Human Resources to deal with

about and evaluate technological innovation projects and their socio-economic repercussions.

All these pre-established forums do not preclude the emergence of more spontaneous and more in line with the needs of the moment. In this way, Company or Workers' Representatives have been requesting the holding of monographic meetings in order to address issues of concern or of current affairs.

To facilitate communication between the parties, information exchange and availability, in 2020, a shared space was created on our Intranet using the Share Point platform, where all the necessary information can be found, with access rights according to the position held by each member. All of this was done to achieve the transparent labour relations model that the Organisation and Human Resources Department aspires to. Finally, the Works Council meets on a monthly basis with

day-to-day issues, as well as having a fluid channel of relations with both unitary and trade union representation.





4.6.1. INFORMATION, **CONSULTATION** AND NEGOTIATION

The human resources processes contain a good number of communications, to both the interested parties and their legal/ union representatives, for the purpose of sharing the circumstances and decisions that affect them directly (in addition to employee disability status changes, information regarding job consolidations, positions filled, substantial modifications of working conditions, application of new employee schedules, overtime scheduling, and other matters is shared).

It also facilitates the expression of the joint will of the workforce on special occasions, for example by making available all possible resources to promote the widest possible participation in

ing to the granting of leave at the Company's expense for the opening of the Works Council secretariat on one day a week, or by accepting that the agreements reached at the negotiating table for the revision of the Collective Agreement be subject to the holding of assemblies and referendums organised by the Social Partners.

In addition to these individual communications, Atlantic Copper has corporate e-mail, backed up by bulletin boards and an intranet, through which circulars are and intranet, through which circulars are communicated and mass announcements (organizational decisions, corporate events, communications on security, achievement

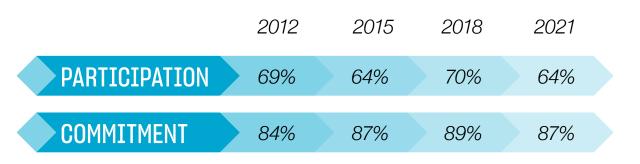
space shared by the RLT and the company was set up on the Intranet to provide the necessary information and speed up agility in the signature processes.

Every three years since 2012, Atlantic Copper has launched a Labour Climate Survey with the aim of gathering the opinion of the workforce on various labour issues (training, promotion, remuneration, etc.). Based on this information, an analysis is carried out on the concerns of the of the staff's concerns and measures are designed to be adopted within the strategy of the Organization and Human Resources De artment for the coming years. To date, four labour climate surveys have been launched, with the last one trade union elections, by agree- of objectives, etc.). In 2020, a corresponding to the year 2021,

with good results in terms of participation rates (69% in 2012, 64% in 2015, 70% in 2018 and 64% in 2021), and in the degree of commitment (84% in 2012, 87% in 2015, 89% in 2018 and 87% in 2021).

Likewise, in 2022, the Company continued the Suggestion Box process, started in 2018, with very positive results. Thanks to this tool, employees can submit complaints and suggestions, even anonymously, to express opinions and make requests.

These complaints/suggestions, posted on the Intranet, can be handled electronically or on paper and receive attention and a response from the different managers in the organisation.



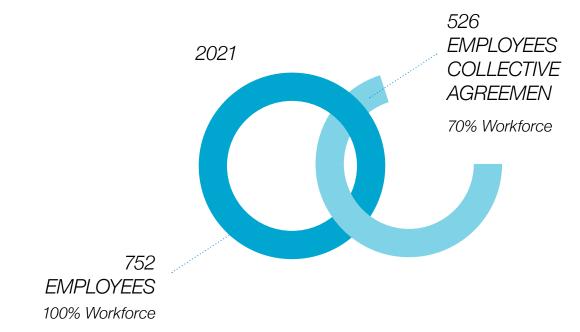
Climate Surveys Data

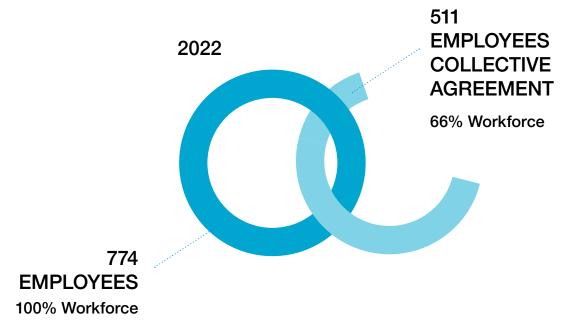


4.6.2 COLLECTIVE AGREEMENT COVERAGE

At year-end 2021, Atlantic Copper's total workforce stood at 752 workers, 526 of whom were employed under the Sixth Collective Agreement. Therefore, 70% were covered by this Agreement. At the end of 2022, Atlantic Copper had a total workforce of 774 employees, of which 511 were employed under the 7th Collective Agreement as of November 2021, which represents a percentage of 66% of the total workforce.

The rest of the workers belong to the group called "supervision", which is outside the scope of application of the collective agreement negotiated with with the Workers' Representation and whose conditions are contractually governed on an individual basis.





Successive Collective Agreements at Atlantic Copper have expressly stated the willingness of the Company and the Workers' Representatives to promote occupational risk prevention policies, in accordance with the

regulations, the ILO Conventions and consultation with workers' representatives.

Since the signing of the 7th Collective Agreement at Atlantic Copper, commitments in this respect have been inclu-

ded in the III Metal Agreement, to which, in addition, the regulation of Cascade Committees is established in Article 77 of the VII Collective Agreement.



Below we show the hours of training by professional category.

<u>4.7</u> HOURS OF **TRAINING**

	2021	2022	_
EXECUTIVE STAFF	10.792	6.128	
TECHNICAL STAFF	13.699	6.688	
ADMINISTRATIVE, COMMERCIAL AND SERVICE STAFF	5.071	5.467	
PERSONAL DE OPERACIONES	33.283	36.763	
TOTAL	63.382	55.046	

This means an average of 83,95 hours of training per person in the 2021 financial year (for an average workforce of 755 people), and 71,58 training hours per person in the financial year 2022 (for an average workforce of 769 people).





4.7.1 EMPLOYMENT PROMOTION MEASURES

Atlantic Copper applies numerous measures to promote employment, the most noteworthy being the following.

- > WORK-STUDY POSITIONS
- > DUAL VOCATIONAL TRAI-NING
- > TEACHING COLLABO-RATION IN SPECIALISED CENTRES
- > ENDOWED CHAIRS WITH THE FOLLOWING INSTITU-TIONS
 - UNIVERSITY OF HUELVA
 - HIGHER TECHNICAL SCHOOL OF MINING AND ENERGY ENGINEE-RING OF MADRID
 - INTERNATIONAL UNIVERSITY OF ANDALUSIA

Atlantic Copper began its journey in Dual Vocational Training in 2018, and our Foundation joined the Alliance for Dual Vocational Training in January 2022.

4.8 DIVERSITY MANAGEMENT

Atlantic Copper manages the diversity of the people with whom it interacts based on the specific needs derived from the personal characteristics identified, for each individual or collective, to the extent that it is capable of satisfying them in a way that is

compatible with its business model.

The following table shows some of the most important actions we carried out in the dimensions we consider most relevant in the area of diversity management:

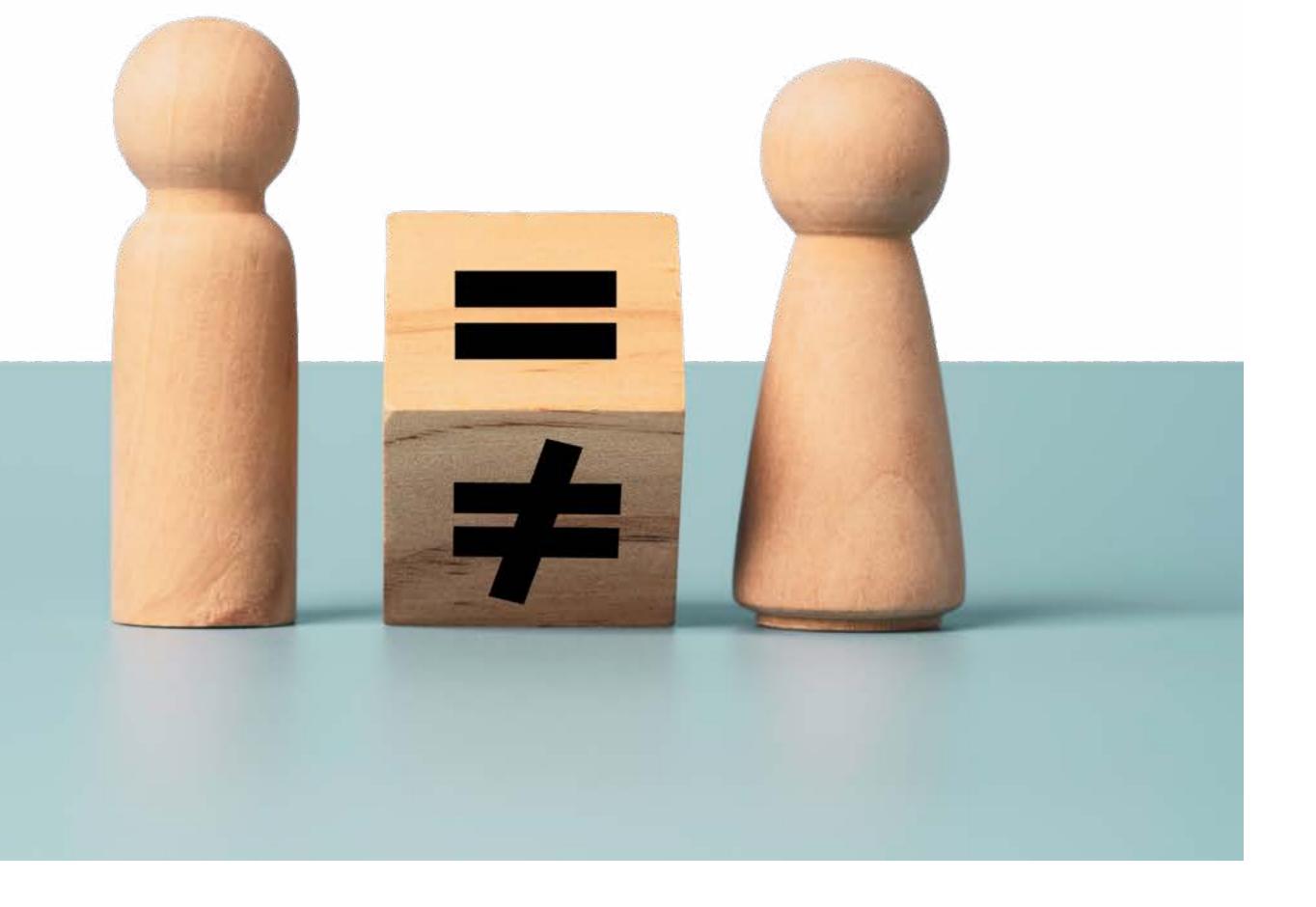






O5. HUMAN RIGHTS

5.1. HUMAN RIGHTS VIOLATION RISK PREVENTION





05. HUMAN RIGHTS

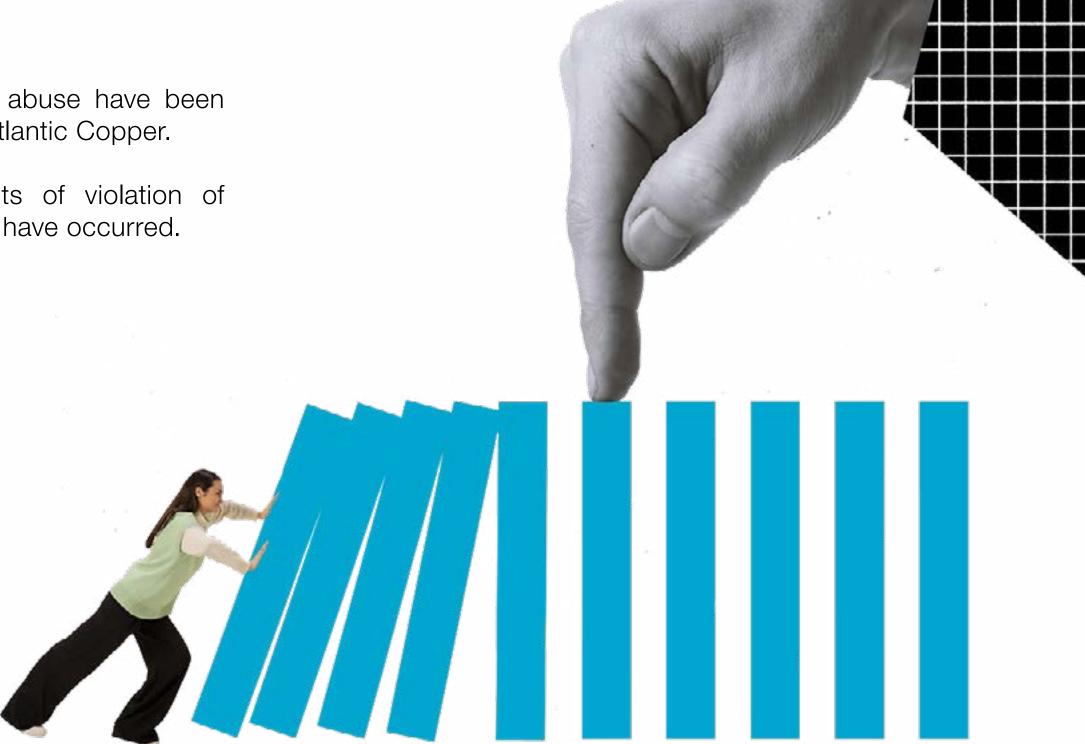
No cases of violation of human rights have been identified at Atlantic Copper. In addition to the SGRS IQNet SR10, the Company has applied the following measures:

<u>5.1</u> **PREVENCIÓN DE RIESGOS** DE VULNERACIÓN **DE DERECHOS HUMANOS**

- Principles Of Ethical Business Conduct (Pbc), With A Whistleblower Channel And The Rest Of The Corporate Policies Of Fcx And Atlantic *Copper (2.1)*
- > Pbc Training Plan (2.1)
- > Criminal Compliance Policy, With Information And Whistleblower Channel (2.9)
- > Criminal Compliance Training Plan (2.9)
- > Harassment Prevention Plan

No cases of abuse have been detected in Atlantic Copper.

No complaints of violation of human rights have occurred.







OG. ETHICAL MANAGEMENT IN BUSINESS

6.1. CONTRIBUTIONS TO FOUNDATIONS AND NON-PROFIT ORGANISATIONS

6.2 USE OF THE COMPLAINTS CHANNEL





06 CONDUCTA ETICA EN LOS NEGOCIOS

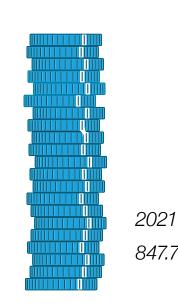
measures adopted to prevent corruption and bribery are integrated into Atlantic Copper's Criminal Compliance Management System mentioned in previous sections.

The relevant measures taken to prevent corruption and bribery include training that we provide to Atlantic Copper workers, on both anticorruption policies and the Principles of Business Conduct (PBC). The training data for the 2021 and 2022 campaigns are as follows:

		2021		2022			
	NO. OF PEOPLE TARGETED	NO. OF PEOPLE TRAINED	PERCENTAGE	NO. OF PEOPLE TARGETED	NO. OF PEOPLE TRAINED	PERCENTAGE	
ANTI-CORRUPTION POLICIES	120	120	100 %	117	117	100 %	
PBC FOR SUPERVISORS AND EXECUTIVES	87	87	100 %	89	89	100 %	
PBC FOR REST OF STAFF	546	546	100 %	556	556	100 %	
PBC FOR NEW HIRES	63	59	94 %	67	64	94 %	

No cases of corruption or bribery have come to light or been recorded in 2021 or 2022.

> **CONTRIBUTIONS** TO FOUNDATIONS AND NON-PROFIT ORGANISATIONS:



847.798,41 €

2022 818.867,42 €

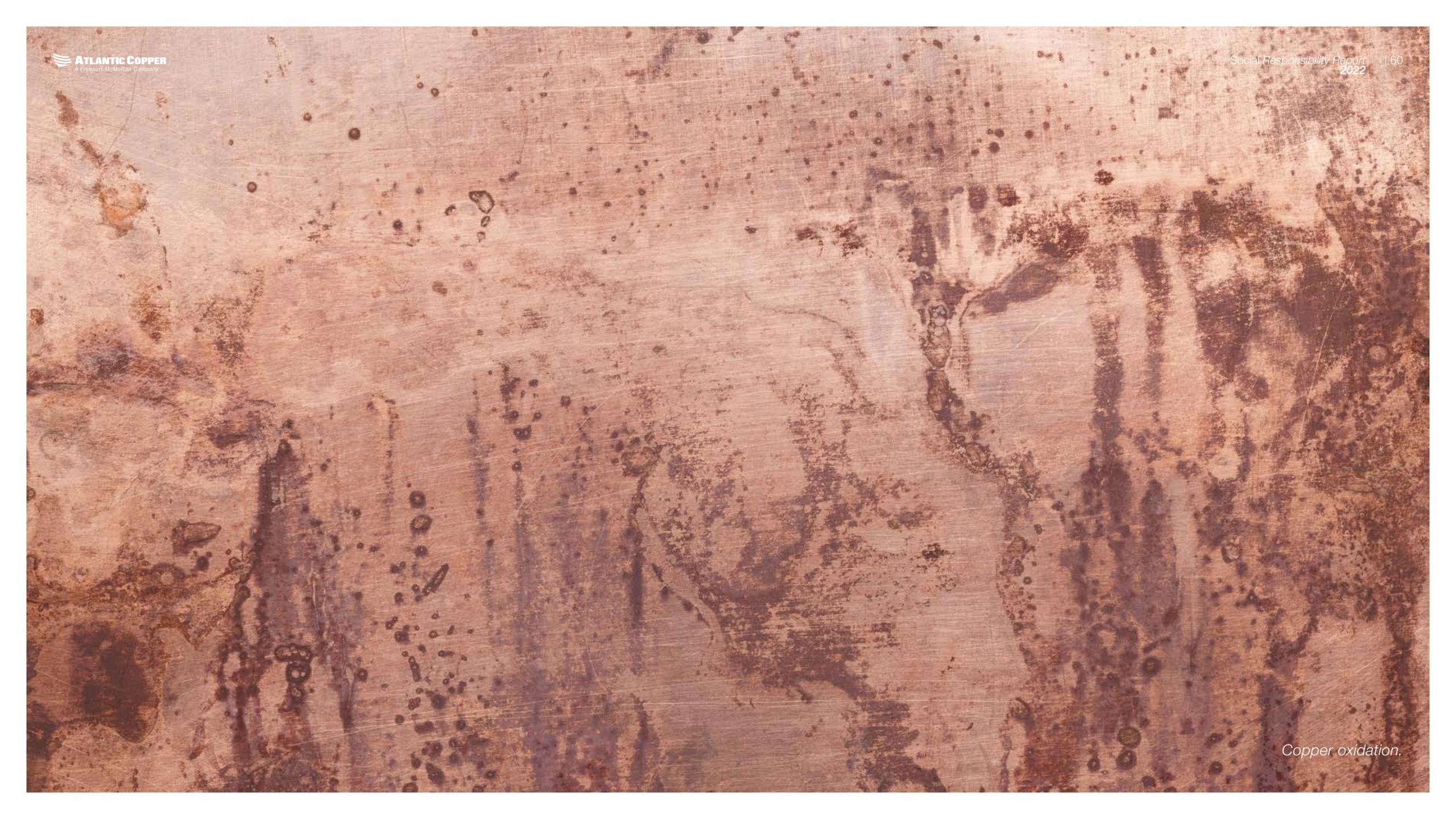


With regard to communications received through ethical mailboxes or whistleblowing channels, a total of 8 were received in 2022. a total of 8, all of which were admitted for processing. For 3 of the complaints, some kind of disciplinary measure or improvement action was adopted, as it has been demonstrated

the existence of irregular conduct or conduct contrary to the code of ethics, without not amount to a criminal offence. Two of the complaints remain under investigation as they were processed at the end of 2022. The other 3 have been closed without further action.

	2021	2022
INAPPROPRIATE CONDUCT	0	3
HARASSMENT	1	2
DATA PROTECTION	0	1
ACCOUNTING IRREGULARITIES	1	0
SECURITY	0	1
OTHER	1	1
TOTAL	3	8

6.2 USE OF THE COMPLAINTS CHANNEL





07. SOCIETY

7.1. POLICIES AND PROCEDURES

7.2. COMMITMENTS TO SUSTAINA-BLE DEVELOPMENT

7.2.1. IMPACT ON EMPLOYMENT AND LOCAL DEVELOPMENT
7.2.2. RELATIONS AND DIALOGUE WITH LOCAL COMMUNITIES
7.2.3. PARTNERSHIP OR SPONSORSHIP ACTIONS

7.3. SUBCONTRACTORS AND SUPPLIERS

7.3.1. PURCHASING POLICY
7.3.2. CONSIDERATION OF SOCIAL AND
ENVIRONMENTAL RESPONSIBILITY
7.3.3. OVERSIGHT AND AUDITING SYSTEMS
7.3.4. RESPONSIBLE SOURCING OF MINERALS

7.4. CUSTOMERS, USERS AND CONSUMERS

7.5. TAX INFORMATION

7.5.1. PROFITS OBTAINED 7.5.2. TAX ON PROFITS PAID 7.5.3. STATE SUBSIDIES RECEIVED





<u>07.</u> <u>SOCIETY</u>

Atlantic Copper has established its Social Responsibility Policy as a fundamental part of its Social Responsibility Management System (SRMS), which meets the requirements of the international IQNet SR 10 standard (2.3), based on the international standard ISO 26000 Guidance on social responsibility. In accordance with this standard, Social Responsibility Objectives are set and Action Plans are established to achieve them, which are monitored and evaluated periodically.

7.1
POLICIES AND
PROCEDURES

7.2 COMMITMENTS TO SUSTAINABLE DEVELOPMENT

Atlantic Copper is firmly committed to adopting the sustainable development goals SDG 2030 and applying them in its activities (2.12).

As a result of this commitment, social responsibility measures are adopted to collaborate with society on an ongoing basis and we join the Spanish Network of the United Nations Global Compact (2.15) in October 2021.

Our progress report was submitted in October 2022 and declared compliant by the Global Deal, renewing our commitment to sustainable development and continuing to be part of the Spanish Network.

7.2.1
IMPACT ON
EMPLOYMENT
AND LOCAL
DEVELOPMENT

Atlantic Copper's impact (Gross Value Added and Employment) on local development and on the territory in the 2021 financial years is shown below. The data for the 2022 financial year were not available on the date this document was prepared.

		2020 / GVA (thousands of €)				2021 / GVA (thousands of €)			
	DI	IRECT	INDIRECT	INDUCED	TOTAL	DIRECT	INDIRECT	INDUCED	TOTAL
VALUE	91.	.282,46	45.259,15	21.350,40	157.892,00	128.363,60	48.762,26	35.668,30	212.793,50
% AIQBE	1	19,7 %	20,4 %	20,4 %	20 %	16,8 %	19,8 %	25,1 %	18,5 %
% HUELVA		-	-	-	1,6 %	-	-	-	2 %
	2020 / Employment				2021 / Employment				
			2020 / Er	mployment			2021 / Er	mployment	
	DI	IRECT	2020 / Er INDIRECT	mployment INDUCED	TOTAL	DIRECT	2021 / Er INDIRECT	nployment INDUCED	TOTAL
VALUE		IRECT 606			TOTAL 1.907	DIRECT 621			TOTAL 2.169
VALUE % AIQBE			INDIRECT	INDUCED	,		INDIRECT	INDUCED	



7.2.2 RELATIONS AND DIALOGUE WITH LOCAL COMMUNITIES

Atlantic Copper, on a voluntary basis, has established in a Social Responsibility Management System (SRMS). It has been certified by AENOR according to the IQNet SR10 standard (which contains the recommendations from the ISO 26000 standard on social responsibility).

7.2.3 PARTNERSHIP OR SPONSORSHIP ACTIONS

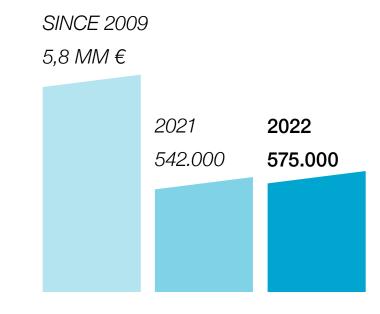
Atlantic Copper launched its own corporate Foundation in 2009 to channel External Social Responsibility actions.

It Board of Trustees includes not only company executives but also stakeholders. Employees are represented by the President of the Work Council, who is an ex-officio board member. Society and the community are represented on its Board of Trustees by the main local authorities: Mayor of the City, President of the Provincial Council, Government Delegate of the Regional Government of Andalusia, President of the Port Authority, and Dean of the University of Huelva.

In 2022, the Atlantic Copper Foundation invested more than

575.000 euros in direct actions in fulfilment of its foundational purposes. The increase in investments for social purposes has been maintained. Since its inception, over 5,3 million euros have been used by the foundation in the execution of its educational, environmental, cultural, social and sports programmes.

Universidad de Huelva





As a product of these, the following data is noteworthy:

- OVER 700 SCHOLARSHIPS FOR UNIVERSITY STUDY IN SPAIN OR ABROAD
- OVER **640** INTERNSHIPS IN ATLANTIC COPPER
- > OVER 16.500 SCHOOLCHILDREN
 PARTICIPATING IN ITS ENVIRONMENTAL
 EDUCATION ACTIVITIES
- > OVER **645 MEAL GRANTS** FOR UNIVERSITY STUDENTS
- > SUPPORT TO OVER 30 SOCIAL AND CHARITABLE ORGANISATIONS

- > OVER **2.300 PARTICIPANTS** IN ITS LITERARY AND PHOTOGRAPHY COMPETITIONS
- OVER 70.000 BENEFICIARIES, DIRECT AND INDIRECT, OF ITS SUPPORT FOR CULTURAL INITIATI-VES (HUELVA FILM FESTIVAL, LATITU-DES PHOTOGRAPHY FESTIVAL)

More details are available at www. fundacion.atlantic-copper.com



7.3.1 PURCHASING POLICY

The Atlantic Copper purchasing policy is established in our Principles of Business Conduct (2.1) and in the FCX Global Supply Chain Policy, Version 2.1, of June 2022.

This Policy is further developed in the Business Partners Code of Conduct, and implements all the Principles of Business Conduct in relation to the behaviour of Atlantic Copper's suppliers.

7.3
SUBCONTRACTORS
AND SUPPLIERS

7.3.2

CONSIDERATION

OF SOCIAL AND

ENVIRONMENTAL

RESPONSIBILITY

Atlantic Copper promotes social responsibility principles and requirements among its direct suppliers through its supplier evaluation process; by sending them its Principles of Business Conduct with instructions for complying with it and sharing it internally and through the Business Partners Code of Conduct, with which the supplier agrees to comply in its contracts with Atlantic Copper.

7.3.3 OVERSIGHT AND AUDITING SYSTEMS

Atlantic Copper's suppliers undergo a prior evaluation, certification and selection process, as established in Procedure AP-MA-Pr 01 Prior evaluation, certification and selection of suppliers and contractors, which establishes the pre-requisites for establishing a contractual relationship with Atlantic Copper as a supplier.

As indicated this procedure, the supplier must fill out a preliminary evaluation questionnaire, which, among other things, includes aspects related to human resources, safety and the environment, quality, and corporate social responsibility. The responses to this questionnaire are analysed and evaluated by Atlantic Copper, and a minimum score is

required in order for acceptance as a supplier.

Following this prior evaluation, the Compliance Department uses a Due Diligence tool for the final supplier certification before acceptance.

Once a relationship is established, the supplier is monitored according to Procedure AP-MA-In 04 Monitoring of suppliers and contractors, which describes the oversight mechanisms in place at Atlantic Copper. These include the following:

- Monitoring of non-conformities in the standardised manage-ment systems, which include the srms (2.3), lems (2.4), loraps, (2.7), Hwms (2.8), And qms (2.10)
- Industrial accidents / incidents reporting practices
- Compliance with safety and environmental plans

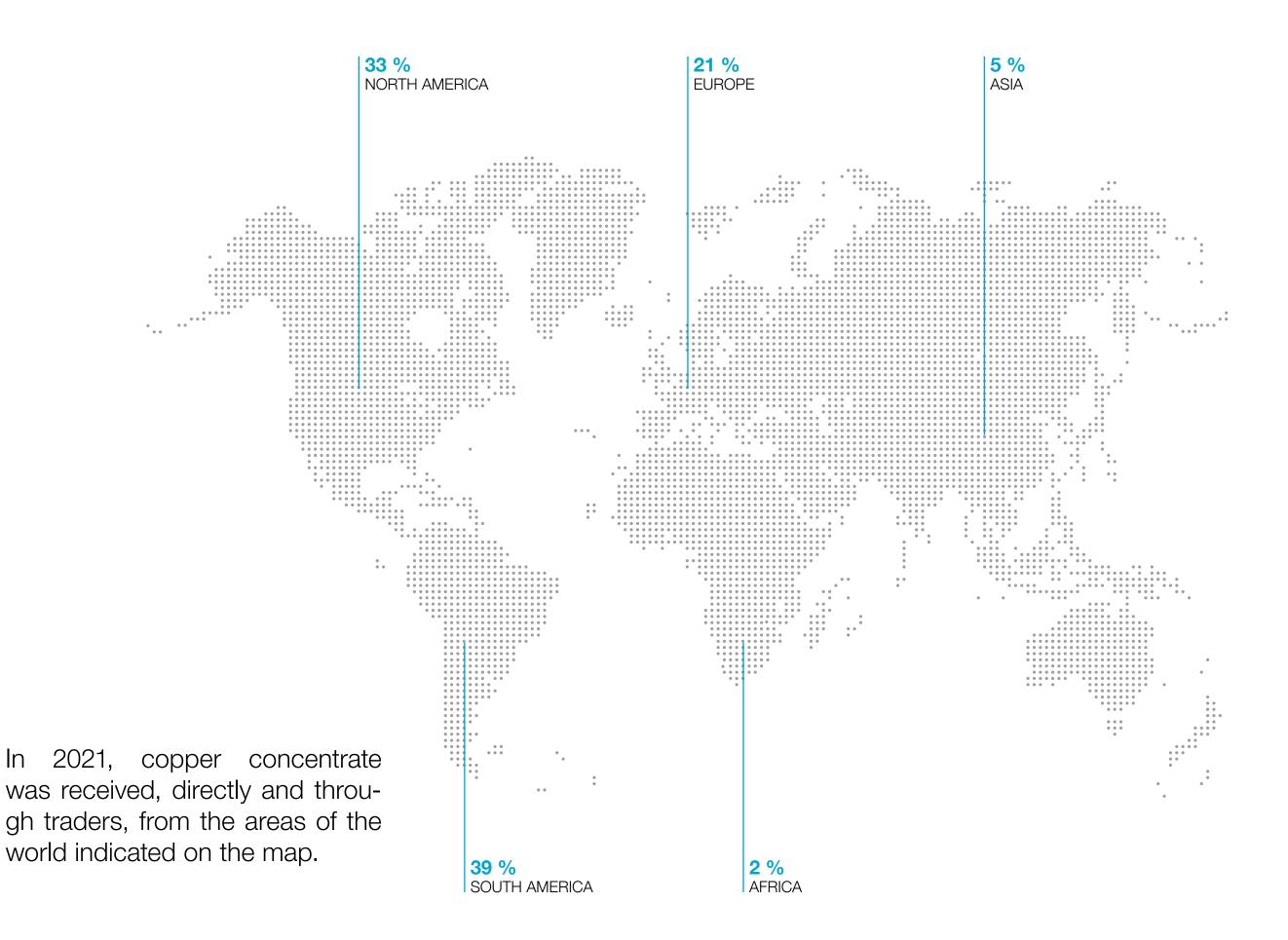


7.3.4 SUMINISTRO RESPONSABLE DE MINERALES

Atlantic Copper recognises the potential risks of significant adverse impacts that can be associated with the extraction and commercialisation of minerals and their derivatives on the areas affected by conflicts and high risk. It also recognises its responsibility to respect human rights and to refrain from contributing to any type of conflict.

Consequently, during 2022 Atlantic Copper has accredited its Responsible Sourcing Programme with the Copper Mark's Joint Due Diligence Standard (2.14). The programme consists of the following sections:

- Adherence To The Responsible Sourcing Of Minerals Policy.
- Assessment of risks for due diligence in our minerals supply chain, evaluating and prioritising sources and suppliers, collecting data on the origin of the concentrates and metals we purchase.
- Responsible sourcing committee.
- Management of risks in purchasing and suppliers.
- Direct communication with employees, members of the community and supply chains.
- Assurance programme, carried out by an independent external auditor, to ensure compliance with the policy and its alignment with the copper mark's joint due diligence standard.





Atlantic Copper's Social Responsibility with respect to its customers is established in the Social Responsibility Management System (SRMS) (2.3), certified by AENOR according to the IQNet SR10 standard (which contains the recommendations from the ISO 26000 standard on social responsibility). The most important aspects in this area are the following:

7.4
CUSTOMERS,
USERS AND
CONSUMERS

- > Atlantic copper does not promote or advertise its products, as they are commodities
- In our commercial actions, we do not allow misleading claims, nor may they involve any type of hazard or be contrary to the social responsibility principles, which is guaranteed through compliance with the pbcs (2.1)
- Atlantic copper creates and fulfils its contracts with its customers in accordance with the principles of transparency, truthfulness, trust and good faith, avoiding abusive actions derived from possible dominant positions
- > Fulfilment of the commitments made to customers is guaranteed through application of the quality management system (2.10)

- All of atlantic copper's purchase orders and contracts with its customers are confidential and include individualised terms for each customer, if applicable, and the pertinent confidentiality clauses
- Atlantic copper has established system for managing customer suggestions, complaints and claims in procedure "Cc-pr 10 customers. Surveys and complaint management"
- Atlantic copper's products and services meet all the applicable legal requirements and include quality, safety, environmental protection and reliability criteria

The customer is provided with all the information necessary for responsible use of the products and services, mainly by sending technical specifications, safety data sheets and exposure scenarios

7.5.1
PROFITS
OBTAINED

The profits obtained by Atlantic Copper in the 2021 and 2022 financial years are shown below.

2021 2022 5.607.587 € -29.955.223 €

O

Profit for each year.

7.5
TAX
INFORMATION

7.5.2 TAX ON PROFITS PAID

The taxes on profits paid by Atlantic Copper in the 2020 and 2021 financial years are shown below.

2021 2022
577.287 € 0 €

Tax on Profits
(Charge for the financial year)

7.5.3
STATE
SUBSIDIES
RECEIVED

The subsidies received by Atlantic Copper in the 2021 and 2022 financial years are shown below.



State subsidies received





O8. INTEGRATION OF THIS REPORT IN THE 2030 SDGS



ATLANTIC COPPER A Freeport-McMoRan Company

O8. INTEGRATION OF THIS REPORT IN THE 2030 SDGS

equality measu
plans
s to fight sexua
crimination poli
management
on of discrimin
onsumption
sity
nd indirect ene
efficiency
enewable ener
nent
e Agreement
nent promotior
ing policy
J. ,
rofits paid
ve m si

5 GENDER FOUALITY	Work-life balance	4.4.2.
EQUALITY	Gender-equality measures	4.6./4.8.
	Equality plans	4.6./4.8.
_	Protocols to fight sexual and gender-based harassment	4.6./4.8.
	Anti-discrimination policies	4.6./4.8.
	Diversity management	4.8.
	Elimination of discrimination in employment and occupation	4.6./4.8.
CLEAN WATER	Water consumption	3.3.
AND SANITATION	Biodiversity	3.5.
Å		
7 AFFORDABLE AND CLEAN ENERGY	Direct and indirect energy consumption	3.3.2.
	Energy efficiency	3.3.3.
	Use of renewable energies	3.3.4.
B DECENT WORK AND ECONOMIC GROWTH	Employment	4.4.
	Collective Agreement	4.6.2.
1	Employment promotion measures	4.7.1.
	Purchasing policy	7.3.1.
	Profits	7.5.1.
	Tax on profits paid	7.5.2.



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Business model	1.	13 CLIMATE ACTION	Environment	
	Reference frameworks	2.		Environmental Impact	3.
	Environment. Measures applied	3.4.2.		Climate change	3.4
	Staff. Measures applied	4.1.		Biodiversity	3.5
	Company and Foundation chairs	4.7.1.		Suppliers. Social and environmental responsibility	7.3
10 REDUCED	Gender-equality measures	4.6.	14 LIFE BELOW WATER	Environment	ć
10 REDUCED INEQUALITIES	Equality plans	4.6.	***	Water consumption	3.3
⟨≡⟩	Diversity management	4.8.		Biodiversity	3.5
•	Elimination of discrimination in employment and occupation	4.6.			
	Foundation's sponsorship activities	7.2.3.	15 LIFE ON LAND	Environment	3
			UN LAND	Pollution	3.
			~	Climate Change	3.4
11 SUSTAINABLE CITIES AND COMMUNITIES	Environment	3.		Biodiversity	3.5
\blacksquare A	Employment	4.4.		Suppliers Social and Environmental Responsibility	7.3
	Human rights	<i>5.</i>			
	Impact on employment and local development	7.2.1.	16 PEACE, JUSTICE AND STRONG	Work organisation	4.4
	Relations and dialogue with local communities	7.2.2.	AND STRUNG INSTITUTIONS	Human rights	Ę
				Fight against corruption and bribery	ϵ
12 RESPONSIBLE CONSUMPTION	Waste	3.2.	_	Society	
AND PRODUCTION	Health and safety	4.5.			
CO	Suppliers. Social and environmental responsibility	7.3.	17 PARTNERSHIPS FOR THE GOALS	Relations and dialogue with local communities	7.2.2
	Responsible sourcing of minerals	7.3.4.		Partnership or sponsorship actions	7.2.3
	Customers, users and consumers	7.4.		Subcontracting and suppliers	7.3
	The Copper Mark	2.14.		Adherence to the Spanish Global Compact Network	2.15





INTEGRATION
OF THIS REPORT
INTO THE
PRINCIPLES OF
THE GLOBAL
COMPACT





O9 INTEGRATION OF THIS REPORT INTO THE PRINCIPLES OF THE GLOBAL COMPACT



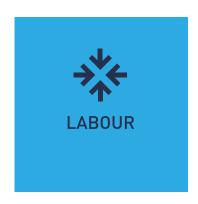
1 Support and respect t	he protection
of human rights.	•
Human Rights	5

Relations and dialogue with local communities 7.2.2.

2 Not to be complicit in human rights abuses.

Environmental and Social Responsibility of Suppliers 7.3.

Responsible mineral supply 7.3.4.



3 Support freedom of association and collective bargaining.

Social Dialogue 4.6.

Information, consultation and negotiation 4.6.1.

Freedom of association and the right to collective bargaining 4.6.1.

4 Support the elimination of all forms of forced and compulsory labour and the under coercion.

Elimination of forced or compulsory labour 5.1.

5 Supporting the elimination of child labour.

Abolición efectiva del trabajo infantil 5.1. Suministro responsable de minerales 7.3.4.

6 Supporting the abolition of discriminatory practices.

Wage gap	4.4
Anti-discrimination policies	4.8./4.6
Elimination of discrimination in employment	
and occupation	4.6



7 Maintain a preventative approach that favours the environment.

Environmental Management System (ISO 14001) 2.4.

Energy Management System (ISO 50001) 2.6.

EMAS Statement 2.5.

Policies and procedures 2.1.

8 Encourage initiatives that promote greater environmental responsibility.

Circular economy and waste prevention and management 3.2./3.2.2.

Biodiversity 3.5.

9 Encourage the development and dissemination of environmentally friendly technologies.

Measures implemented	3.4.2.
Energy efficiency	3.3.3.
Energy recovery and use of renewable energies	<i>3.3.4.</i>
Climate change	3.4.



10 Working against corruption in all its forms.

FCX Principles of Business Conduct	2.1.
Anti-corruption policy and guidelines	2.1.
Anti-corruption and anti-bribery	6.
Supplier Code of Conduct	2.1.



2022 Social Responsibility Report

