



**Kennecott Utah Copper LLC**  
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## Policy statement

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# Responsible Minerals Sourcing Policy

Revision date: 01 February 2026

### Linkage to other relevant policies and standards

- The Way We Work
- Human Rights Policy
- Health, Safety, Environment and Communities Policy
- Business Integrity Standard
- Procurement Standard
- Supplier Code of Conduct
- Related procedures and guidance notes

### Document purpose

This policy articulates the fundamental elements of **Kennecott Utah Copper LLC (RTK)**'s approach to ensure responsible sourcing practices are followed in relation to the extraction, trading, handling and exporting of minerals from conflict-affected and high-risk areas.

### Our operations

RTK operates mining and metals processing facilities for the extraction of copper and other metals, in Salt Lake City, Utah. Once ore is extracted and milled, concentrate is processed in a smelter to produce copper anodes, which are further refined into copper cathodes. Gold, silver, and other precious metals are captured in the electrolytic slime during the copper refining process. The electrolytic slime is transferred to our precious metals plant, where RTK produces high purity gold (Grade 99.99) and silver bars (Grade 99.95). The copper materials entering the process are sourced from RTK's Bingham Canyon Mine. To supplement the input to the copper smelting process, RTK purchases and processes third party copper concentrates, or other copper materials. These may contain gold and/or silver as an inherent part of the copper material.

### Our commitments

RTK is a member of the Rio Tinto Group, and as such operates according to the Rio Tinto overarching global code of business conduct, The Way We Work, which contains the principles and standards of conduct that affirm our commitment and ambitions for a safe and sustainable future. These principles include our commitment to, amongst others, compliance with applicable laws everywhere we work; health, wellbeing, safety and security; equity, diversity and inclusion; respect for human rights; engaging with communities; environment; countering bribery and corruption; ethical decision-making and other important responsible business practices.

RTK recognises the risks of significant adverse impacts associated with the extraction, handling, trading and exporting of minerals from conflict-affected and high-risk areas – particularly in relation to human rights, conflict, money laundering and terrorist-financing, and bribery and corruption. We are committed to responsible sourcing practices that demonstrate our respect for human rights and do not contribute to conflict.

## How we implement our commitments

Our approach to the responsible sourcing of minerals in our supply chain is materially aligned to:

- the due diligence framework and the principles of the policy model set out in Annexes I and II of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*<sup>i</sup>,
- the requirements for responsible metal production and sourcing throughout the copper, molybdenum, nickel and zinc value chains set out in the *Copper Mark Criteria for Responsible Production*<sup>ii</sup>, and
- the London Bullion Market Association (LBMA)'s *Responsible Gold* and *Responsible Silver Guidance*<sup>iii</sup>.

RTK follows a risk-based approach to the management of minerals sourcing, which includes the following key elements:

- Establishing and maintaining a management system that sets out our expectations from suppliers, supports the identification, assessment and management of risks in the supply chain, maintains a chain of custody;
- Maintaining a confidential grievance mechanism, receives and addresses grievances or enquiries from employees or external stakeholders to raise concerns — including anonymously — through 'myVoice' or RTK's Operational Grievance Mechanism (SOP 99000-STD-00001);
- Establishing ongoing auditing, assurance and certification to meet relevant industry requirements; and
- Publicly reporting on our responsible sourcing practices, including supply chain due diligence, through any regulatory conflict minerals disclosures and the Rio Tinto Group annual sustainability reporting and modern slavery statements

## Review and approval

This policy will be reviewed on a regular basis, and updated as appropriate, to reflect changes in policy or improvement opportunities.

*Nate Foster*

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**Nate Foster**  
**Managing Director**

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<sup>i</sup> <https://www.oecd.org/corporate/mne/mining.htm>

<sup>ii</sup> <https://coppermark.org/standards/criteria/>

<sup>iii</sup> <https://www.lbma.org.uk/responsible-sourcing/guidance-documents>