

The Consolidated Standard

Claims Policy

Final Consultation Draft

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The Consolidated Standard Claims Policy

The Copper Mark is the trading name of the UK incorporated not-for-profit company that owns and governs the certification mark and logo trademarks, collectively referred to as “performance claims”. The Copper Mark will evolve to a new name and brand with the integration of the Consolidated Standard. For this reason, it is referred to as “legal entity” throughout this document.

The legal entity retains ownership of and governs the use of existing metal-specific logo marks, known as the following:

- “The Copper Mark”.
- “The Nickel Mark”.
- “The Zinc Mark”; and
- “The Molybdenum Mark”

Disclaimer

This document was previously titled “The Consolidated Standard Reporting & Claims Policy”. The title has since been updated to “The Consolidated Standard Claims Policy”.

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1. Introduction

1.1 About this Policy

A claim is any message, logo or imagery used to communicate a level of achievement or quality. The purpose of the Claims Policy is to define the “Consolidated Standard Claims” and to set out the rules and supporting guidance for all aspects of their use. It outlines the types of reporting and claims both allowed and prohibited by the Consolidated Standard. It also addresses the measures the Consolidated Standard may take to monitor reporting and claims and enforce the rules contained in this policy.

It is intended to help prevent inaccurate claims and mitigate the risk of greenwashing.

1.2 Legal Compliance

Companies and their Facilities that are covered by this policy are each responsible for legal compliance with applicable regulations, including labelling, advertisement, consumer protection and competition laws, at all times. The legal entity cannot accept liability for any violations of law, or any infringement of third-party rights made by other organisations.

In line with the introduction of new legislation around transparency and rigour in sustainability claims, this policy strictly prohibits the use of claims as a means to greenwash or otherwise contravene the intent of legislation.

1.3 The Consolidated Standard Claims

The Consolidated Standard enables Facilities to report performance data related to the Standard, and when performance reaches defined thresholds, make claims to differentiate their business. Claims are made at the Facility-level, recognising that assurance on the Consolidated Standard is undertaken at the Facility level.

The Consolidated Standard claim is a claim or representation that is public-facing or used in business to business (B2B) communications, is documented and consists of one or more of:

- The aggregated score of the Facility against the total applicable requirements of the Consolidated Standard; and
- Assured performance levels of the sub-sections of applicable Performance Areas of the Consolidated Standard; and/or
- The Performance Claim, consisting of a metal-agnostic logo (for which sites producing any mined commodity are eligible) or one or more of the metal marks, including The Copper Mark, The Molybdenum Mark, The Nickel Mark, the Zinc Mark and other logos or metal marks if developed (herein referred to as “metal marks”). It should also be noted that the existing metal marks may, in due course, be replaced by a more generic mark. Use of the metal marks is available to Facilities that produce that metal, whether as primary or byproduct, but not alloyed or otherwise mixed-metal products.

Through this policy, the Consolidated Standard controls all relevant rules for reporting and making claims to ensure that such claims are credible, accurate and not misused. This means that the legal entity, through the Secretariat, must grant permission for any reporting based on the Consolidated Standard and use of related claims, unless stipulated otherwise in this policy. The legal entity reserves the right to act on any use of its name or logo that it reasonably believes to be inappropriate.

2. General Requirements for all Consolidated Standard Claims

2.1 General

The following rules apply to all Consolidated Standard claims:

- The Performance Claims must be used and referred to as set out in Annex I.
- The names and logos of the Performance Claims may not be translated into other languages without also retaining the English versions for reference.
- The Consolidated Standard claims, including their logos or names, must never be displayed in such a way that is misleading or confusing or might lead to any harm or prejudice to the reputation or credibility of the legal entity.
- The use of the Consolidated Standard claims, including their logos or names as, or as part of, a brand name is prohibited.
- The Consolidated Standard claims, including their logos or names, must not be placed in such a way that they could be interpreted as belonging to any company or organisation other than the legal entity.
- The use of the Consolidated Standard claims, including their logos or names, alongside other sustainability or responsible sourcing logos, marks or seals is generally permitted.
- The use of Consolidated Standard claims, including their logos or names, must be in accordance with any Branding Guidelines developed by the legal entity.

3. Claims

3.1 Types of Claims

The legal entity allows for the following types of claims:

- Public Commitment to Participate
- Assured Claim
- Performance Claim

All claims are published by the Secretariat on the legal entity's website. If any of the claims are also published by the Facility, it must include the link to the source of the claim on the legal entity's website.

3.1.1 Public Commitment to Participate

The Public Commitment to Participate is a public statement that the Facility participates in the Consolidated Standard Assurance Process. It can be expressed in two ways:

1. By the Secretariat, through listing the Facility on the website of the Consolidated Standard; or
2. By the Facility, solely to indicate that it has committed to participate in the Consolidated Standard and has begun implementing the standard, and only after the application has been accepted by the Secretariat.

The Public Commitment to Participate does not convey any information on the performance of the Facility against the requirements of the Consolidated Standard, is time limited, and does not allow for the use of any logo.

A Facility may make a Public Commitment to Participate as soon as its application has been accepted by the Secretariat and until its first Assured Report is completed and published on the Consolidated Standard's website. After the Assurance Report is finalised and published, the Facility will be able to progress to the Assured Claim and/or the Performance Claim as described below.

Any attempt to use a Public Commitment to Participate in a manner that implicitly or explicitly communicates an achievement of performance against the requirements of the Consolidated Standard is in violation of this policy.

3.1.2 Assured Claim

The Assured Claim is the assured performance of a Facility participating in the Consolidated Standard. The Assured Claim can be made by a Facility as soon as the Facility's first Assurance Report has been published on the Consolidated Standard's website, no later than 15 months following the Commencement Date¹.

The Assured Claim communicates the level of performance achieved within each of the 48 applicable sub-sections of the 24 Performance Areas found in the Consolidated Standard. A Facility may continue to use the Assured Claim as long as it remains in good standing within the Consolidated Standard. This means that it must continue to:

- implement the Assurance Process and adhere to the applicable policies and procedures of the Consolidated Standard,
- continue to publish its Self-Assessed Reports in the two years between assurance cycles,
- undertake the independent assurance every third year,
- demonstrate performance improvement through each assurance cycle until Good Practice has been achieved in all applicable Performance Areas of the Consolidated Standard,
- ensure its fees are paid-in-full.

¹ Commencement date – this is the date on which the Facility's application to participate in the Consolidated Standard is approved and the Facility's participation formally begins. This date forms the basis for the beginning of the assurance and reporting cycle for the Facility.

3.1.2.1 Aggregated Score

The Secretariat will publish on the website of the Consolidated Standard the Facility's aggregated score. The aggregated score is a single performance score, calculated as the percentage of the total number of requirements met at the Towards Good Practice (previously called Foundational Level) and Good Practice Levels versus the total number of applicable requirements, whereby:

$$\text{Total number of applicable requirements} = (\text{All requirements in Towards Good Practice} + \text{All requirements in Good Practice Level}) - (\text{Not applicable requirements in Towards Good Practice} + \text{Not applicable requirements in Good Practice Level})$$

The aggregated score represents **the progress towards the Good Practice Level** and does not include Leading Practice Level. The aggregated score may be updated following implementation of the medium-term corrective actions, if assured by the Assurance Provider), or through the self-assessment (annually). Self-assessed scores will be clearly marked as such on the Secretariat's website to differentiate these from the assured scores. The aggregated score can mask weaker performance in specific performance areas and should not be interpreted on its own as an indicator of overall performance. Where the facility makes a claim, it must link to the source of the information/website of the Secretariat.

3.1.3 Performance Claim

The Performance Claim is a claim by any Facility that has completed the Consolidated Standard's independent Assurance Process and has reached the minimum threshold defined below.

A Facility must first confirm with the Secretariat that it is permitted to use the Performance Claim.

Facilities that produce one or more of the minerals or metals covered by the metal marks can apply for one or more metals marks based on the metals they produce (primary or as byproduct), as well as the metal agnostic logo. Facilities that produce metals or minerals not covered by one of the metals marks can apply for the metal agnostic logo. Qualifying for the Performance Claim and being approved to use it entitles the Facility to use the respective logo as an indication of its level of performance in the Consolidated Standard.

After a Facility has earned the right to use the Performance Claim, it may continue to do so as long as it remains in good standing within the Consolidated Standard. This means that it must:

- continue to implement the Assurance Process and adhere to the applicable policies and procedures of the Consolidated Standard,
- continue to publish its Self-Assessed Reports in the two years between assurance cycles,
- continue to undertake independent assurance every third year,
- maintain its performance to meet the minimum threshold to maintain and obtain the Performance Claim as defined below.
- ensure its fees continue to be paid-in-full.

3.1.3.1 Minimum Threshold for Obtaining and Maintaining the Performance Claim

To obtain the Performance Claim, **all of the following conditions must be met:**

- The Facility has an aggregated score of a minimum of 80%; and
- All applicable Performance Areas are at least at the Towards Good Practice Level; and
- 80% of all applicable Performance Areas are at Good Practice Level, and
- At least 4 Performance Areas per pillar of the Consolidated Standard must be at Good Practice Level.

To maintain the Performance Claim, the Facility must close any gaps to achieve Good Practice Level in all applicable Performance Areas within one assurance cycle. For the purpose of the Performance Claim, this includes from 'Self-Assessment' up to, and including, the 'medium term corrective actions' step of the Consolidated Standard Assurance Process (in accordance with figure 1: *Overview of the Assurance Process* in the CMSI Assurance Process document).

At such time as a revised version or a new version of the Consolidated Standard is launched, the timeline resets and the Facility may again maintain its Performance Claim if the conditions above are met and if any gaps to achieve Good Practice Level in all applicable Performance Areas are closed within one assurance cycle.

3.2 Self-Assessed Results

A Self-Assessed Report is prepared by the Facility in the years between the independent third-party assurance engagement. It consists of individual performance results for each of the applicable 48 sub-sections of the 24 Performance Areas found in the Consolidated Standard. For any of the 48 sub-sections that do not meet Good Practice Level, the Facility must also summarise the gaps and intended improvement plan to reach Good Practice Level (in accordance with section 4.5 of the CMSI Assurance Process document).

The Self-Assessed Report must:

- Be published by the Consolidated Standard Secretariat on the Consolidated Standard's web page and clearly labelled as self-assessed performance results.
- If published by the Facility, be clearly labelled as self-assessed performance results, and include a link to the performance results as published on the Consolidated Standard's website.

These Self-Assessed Reports are prepared in the years in which a Facility is not subject to the Assurance Process. The objective for requiring the publication of Self-Assessed Reports in between the three-year assurance cycle is to motivate performance improvement between cycles.

A Facility's first Self-Assessed Report, which must be submitted within 3-6 months of its Commencement Date, is not published.

3.3 Consolidated Standard Revisions and Claims

The Consolidated Standard will undergo reviews and revisions on a periodic basis. Should the Standard change, Facilities will be able to maintain their Consolidated Standard claims until the next assurance cycle.

3.4 Assurance Provider Claims

The Consolidated Standard encourages expressions of support and the promotion of the Consolidated Standard by approved Assurance Providers in good standing included in the registry of approved Assurance Providers on the Consolidated Standard website. Such Assurance Providers may promote their services in relation to the Consolidated Standard; however, they may not use any logos, to demonstrate to clients, potential clients and other interested parties that they are accredited to provide assurance services on behalf of the Consolidated Standard.

4. Monitoring and Enforcement

It is essential that claims be accurate. The Secretariat will monitor the public use of claims that are made. In cases where a claim implies a formal association with the legal entity where none exists, or implies a performance level of the Facility beyond what is assured by the Consolidated Standard Assurance Process, resulting in misleading business, stakeholders or the general public, the Secretariat will take appropriate steps (including legal recourse, as needed) to protect the legal entity's intellectual property rights and brand.

4.1 Monitoring Use of Claims and Reporting

The Secretariat will implement the following strategies to monitor the use of related claims and reports:

- The Consolidated Standard Secretariat will carry out checks to monitor internet-based claims and cross-check these with approved claims, using internet search services.
- Interested parties can report concerns about Consolidated Standard claims, either directly to the Secretariat or through the Consolidated Standard Grievance Mechanism. The Grievance Mechanism is accessible through the Consolidated Standard website and overseen by the Secretariat.

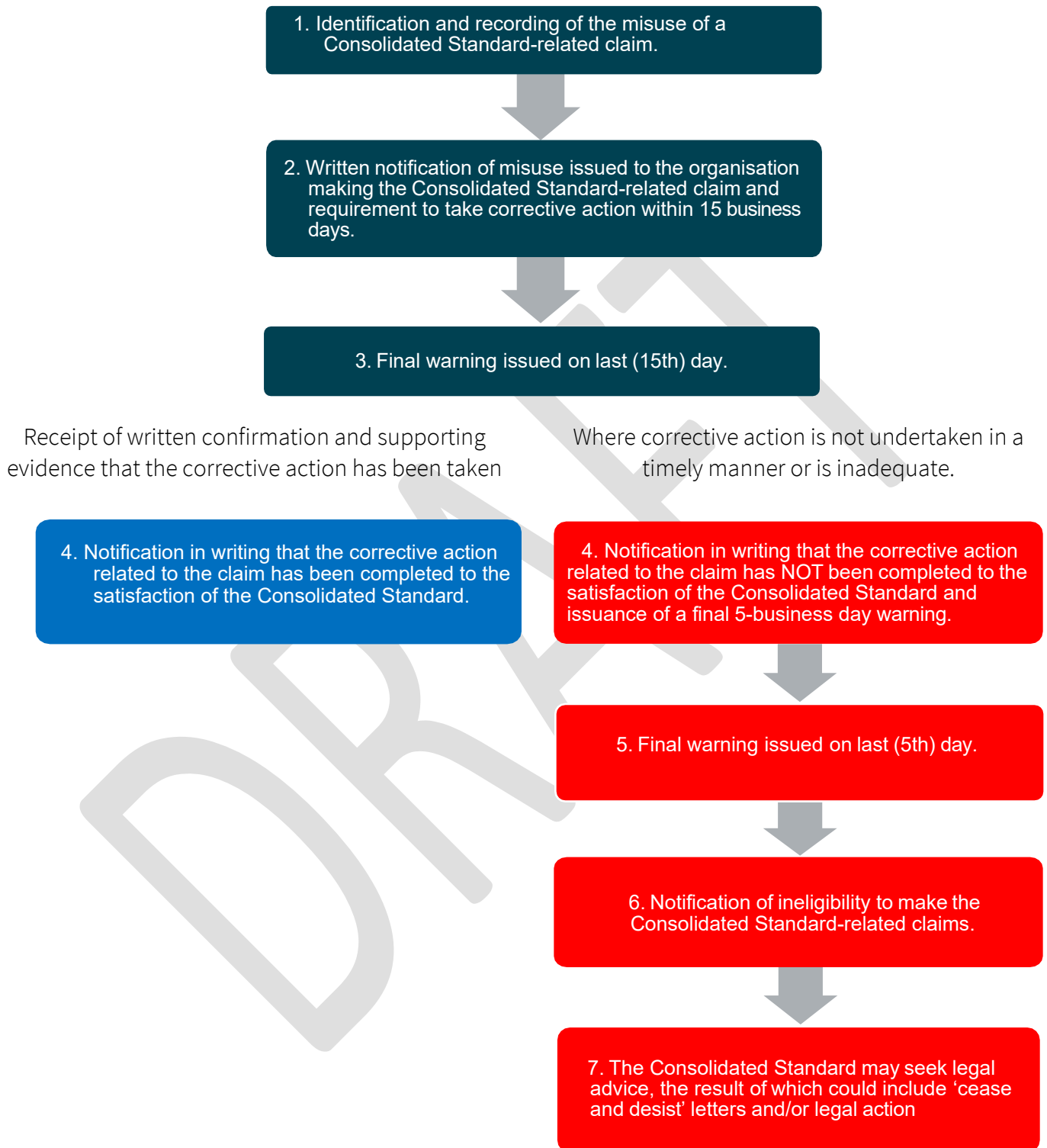
4.2 Identified Misuse of Consolidated Standard-Claims.

The Secretariat has the right to suspend or withdraw approval for use of Consolidated Standard claims where there is a reasonable risk that a Consolidated Standard claim may be false, misleading or confusing or where a claim is being used in a manner that is not authorised by this policy.

Where instances of misuse are identified, the Secretariat will engage with the Facility in question to clarify requirements for proper use, working collaboratively with the Facility to modify or remove any misused claims, and encourage engagement with the Facility's stakeholders and supply chain to correct errors or misstatements. In cases where a Facility is unwilling to respect the terms of this policy, appropriate action will be taken to defend the registered trademarks of the legal entity, including possible legal action.

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In cases of misuse, the Secretariat will take the following steps:



5. Review of this Policy

The Secretariat will continue to engage with Facilities and stakeholders on the content, implementation and oversight of this policy. This policy will be regularly reviewed to take into account implementation experience and identify where it can be improved.

6. Contact

This policy aims to cover the key information relating to making Consolidated Standard claims. The Secretariat welcomes feedback and questions, which will be used to inform future revisions of the Policy.

7. References

This Policy has been developed based on the ISEAL Alliance, Sustainability Claims Good Practice Guide, Version 1.0, May 2015.

8. Glossary

Assured Claim: The Assured Claim is the assured performance of a Facility participating in the Consolidated Standard.

Consolidated Standard Claims: A claim or representation that is public-facing or used in business to business (B2B) communications, is documented, and consists of one or more of:

- The aggregated score of the Facility against the total applicable requirements of the Consolidated Standard; and
- Assured performance levels of the sub-sections of applicable Performance Areas of the Consolidated Standard; and / or
- The Performance Claim, consisting of a metal-agnostic logo (for which sites producing any mined commodity are eligible) or one or more of the metal marks, including The Copper Mark, The Molybdenum Mark, The Nickel Mark, the Zinc Mark and other logos or metal marks if developed

Legal Entity: Means The Copper Mark, the UK incorporated not-for-profit company number 12370476 that owns and governs the certification mark and logo trademarks, collectively referred to as “performance claims”.

Metals Marks: The Copper Mark, The Molybdenum Mark, The Nickel Mark, the Zinc Mark and other logos or metal marks if developed.





Performance Claims: The Performance Claim is a claim by any Facility that has completed the Consolidated Standard’s independent Assurance Process and has reached the minimum threshold defined in this policy. Performance Claims include the following, existing, metal-





specific logo marks

- “The Copper Mark”;
- “The Nickel Mark”;
- “The Zinc Mark”; and
- “The Molybdenum Mark; and
- A metal-agnostic certification mark and logo trademark for the Consolidated Standard.

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Annex I: Performance Claims

| Name | Logo(s) | Permitted users |
|---------------------|--|--|
| Metal Agnostic Logo | To be developed | Facilities that have been assured as having met the required performance threshold defined in Section 3.1.3.1 and which produce products that do not align with the various metal marks listed in this Annex |
| The Copper Mark |  or  | Facilities that have been assured as having meet the required performance threshold defined in Section 3.1.3.1 and produce a saleable Copper product |
| The Nickel Mark |  or  | Facilities that have been assured as having met the required performance threshold defined in Section 3.1.3.1 and produce a saleable Nickel product |

| | | |
|---------------------|---|---|
| The Zinc Mark |  or  | Facilities that have been assured as having met the required performance threshold defined in Section 3.1.3.1 and produce a saleable Zinc product |
| The Molybdenum Mark |  or  | Facilities that have been assured as having met the required performance threshold defined in Section 3.1.3.1 and produce a saleable Molybdenum product |

Annex II: Examples of the Different Types of Claims

To help build understanding around the topic of claims, the below table provides sentence examples of what an implementing company can and cannot state (i.e. claim):

| Type of Claim | Example of what an implementing company CAN claim | Example of what an implementing company CANNOT claim |
|----------------------------------|---|---|
| Public Commitment to Participate | "[XYZ] Facility is currently in the process of implementing the Consolidated Standard." | "[XYZ] Facility is in conformance with the Consolidated Standard." |
| Assured Claim | "[XYZ] Facility has undergone independent assurance and these are its results: [<i>LINK to Consolidated Standard assured report</i>]" | Use of Logo + "[XYZ] Facility is a responsible producer having achieved full conformance with the Consolidated Standard." |
| Performance Claim | Use of Logo + "[XYZ] Facility has undergone independent assurance and is proud to have been awarded the [Metal Agnostic Logo]" or "[XYZ] Facility has undergone independent assurance and is proud to have achieved Good Practice level across all 24 Performance Areas." | As the Standard and respective claims are assessed at the Facility level, upon award of a Performance Claim, the group company cannot make any claims related to the Consolidated Standard beyond the facility that has been awarded the Performance Claim. An example of language which would not be permitted is: "[ABC]'s [XYZ] Facility has been awarded the [<i>Consolidated Standard Mark</i>]. Our company is proud to be certified as a responsible producer." |

Annex III: Examples of Use of The Company Logos

To be developed. See Annex III of [The Copper Mark Claims Guide](#) for examples of what these will include.