LME responsible sourcing

ICA workshop – Asia Copper Conference November 2019



SETTING THE GLOBAL STANDARD



The LME's responsible sourcing journey...

4Q17 Responsible sourcing survey

- Sent to all LME-listed brands in Nov-17
- 55% response rate –
 broad indication that
 most brands already
 working on RS
 initiatives through
 variety of routes, so
 LME action would be
 in line with market
 practice

3Q18 Pre-release position paper

Sent confidentially to c.40 core RS stakeholders for initial views in Jul-18 16 responses helped

define LME proposal

4Q18 Position paper

- Open from 5-Oct-18– 30-Nov-1839 responses
- Six core themes to feedback

2Q19 Consultation

- Open from 23-Apr-19 – 30-Jun-19
- 33 responses
- Responses from a wide array of market participants

25-Oct-19 Final requirements announced

- Extensive market engagement
- Final rules now public. Further engagement with producers underway



...with three key drivers for action...





- The LME believes the industry has an ethical imperative to embrace principles of responsible sourcing
- The LME is a seller's option market, which means that a buyer of metal on the LME may be delivered metal of any LME brand. The LME cannot accept a situation where consumers are required to take delivery of metal which is not responsibly sourced

2. Commercial



- The fundamental service of the LME is to price metals and the LME price will generally be the price of the least valuable brand in its brand lists
- The LME must act to ensure its price reflects the value of responsibly sourced metal, and is not artificially depressed by metal which is not sourced in such a manner

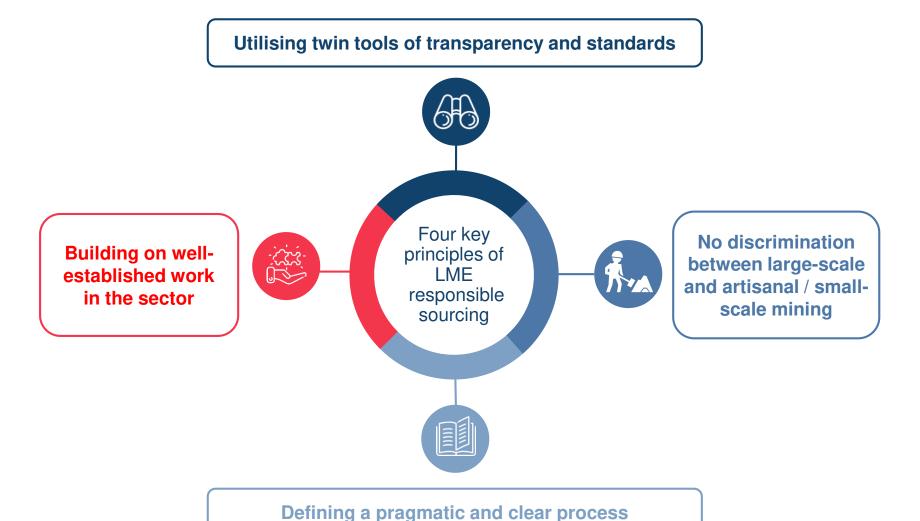
3. Providing leadership



- The LME has listened to calls to take a leading role. These calls arose because the LME can most efficiently promote a centralised process
- The LME will provide leadership in a way that leverages its knowledge of the market, respects logistical challenges, builds on existing work, and provides appropriate support to producers



...centred around four key principles





What did we learn from the consultation?



1 AVOID STIGMATISATION AND PRIORITISE HOLISTIC OECD COMPLIANCE Concern that the LME Red Flag Assessment could unfairly focus the market on red flags, and stigmatise those brands and / or locations

The LME will now provide three routes through which brands can demonstrate OECD compliance so that all well-intentioned brands have a path to market



RESPECT WORK TO DATE ON TRANSPARENCY

Clear market feedback that OECD Step 5 transparency represents the agreed global standard, and should be respected by the LME's proposals LME Red Flag Assessment template will continue to be available as a convenient route to meeting Step 5 requirements, but existing routes to Step 5 transparency (such as those in alignment-assessed industry standards) will also be respected. The LME will work with the OECD and stakeholders to ensure the ongoing industry-wide development of Step 5 reporting best practices, including corruption risks from large-scale mining



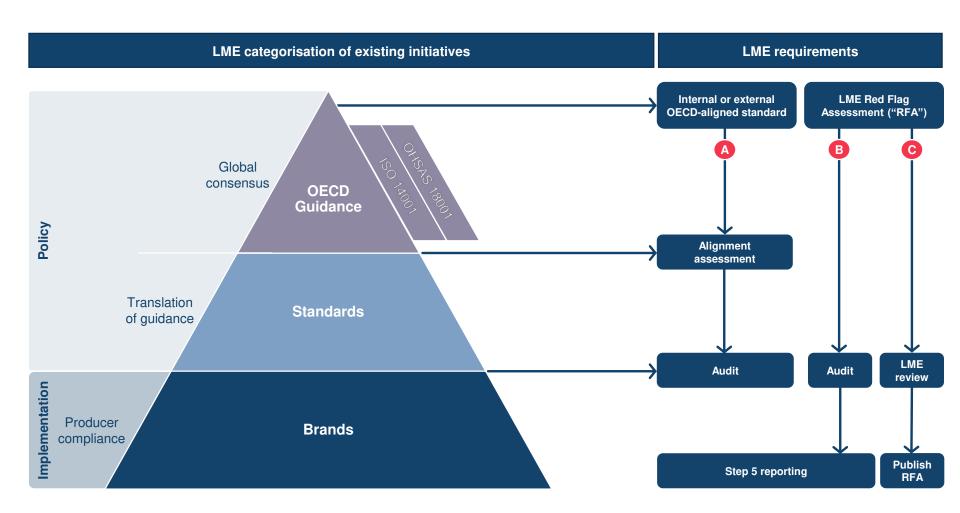
PROVIDE TIME FOR SMALLER PRODUCERS TO COMPLY Concern that aggressive compliance timelines would advantage larger producers with extensive legal and compliance capabilities, and "freeze out" smaller players

The LME will now provide more realistic timelines for compliance, with full engagement by 2022 and full compliance by 2023





The LME framework and proposal



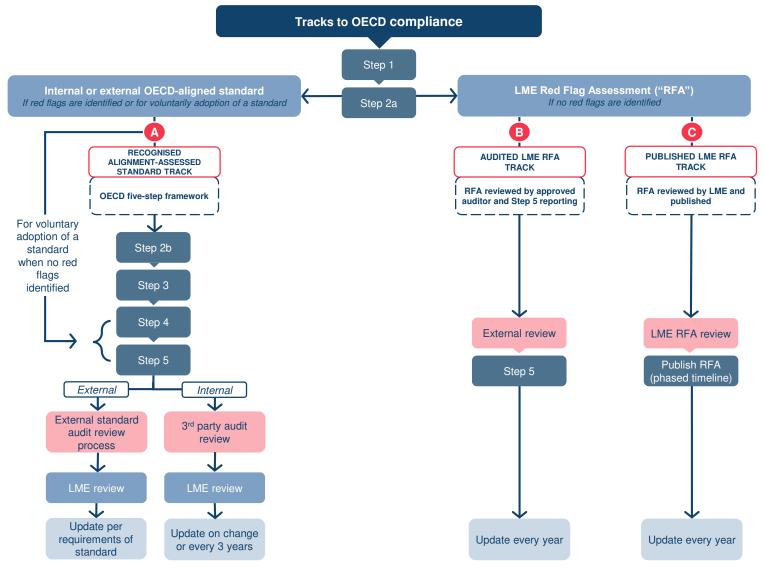


OECD five-step framework

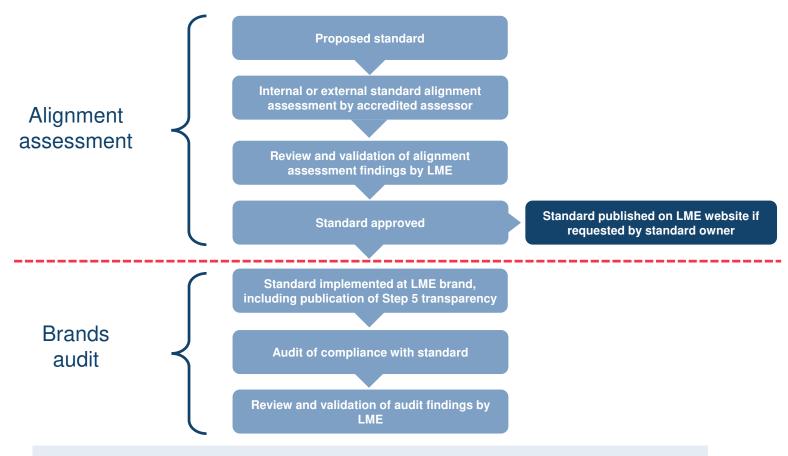




LME tracks to responsible sourcing compliance



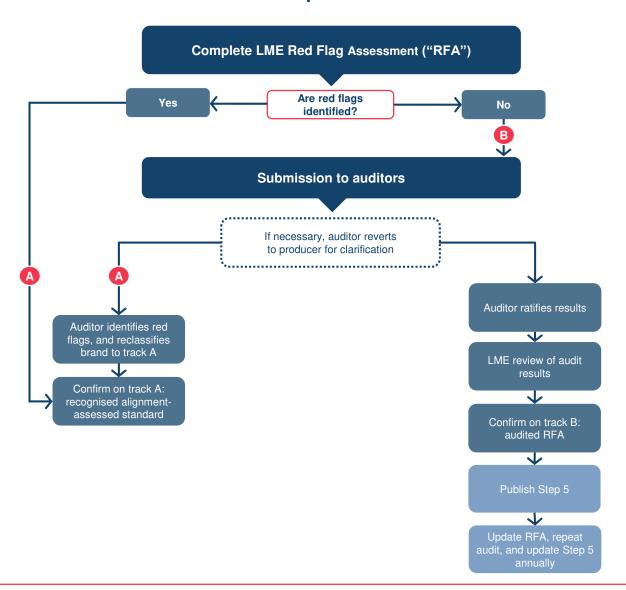
Track A: Recognised alignment-assessed standard process



- · Alignment assessment re-performed if either guidance or standards undergo material change
- · Alignment assessor not permitted to conduct standards audit for minimum of two years following alignment assessment
- · Audit process repeated as specified by standard body, and at least every three years for internal standards

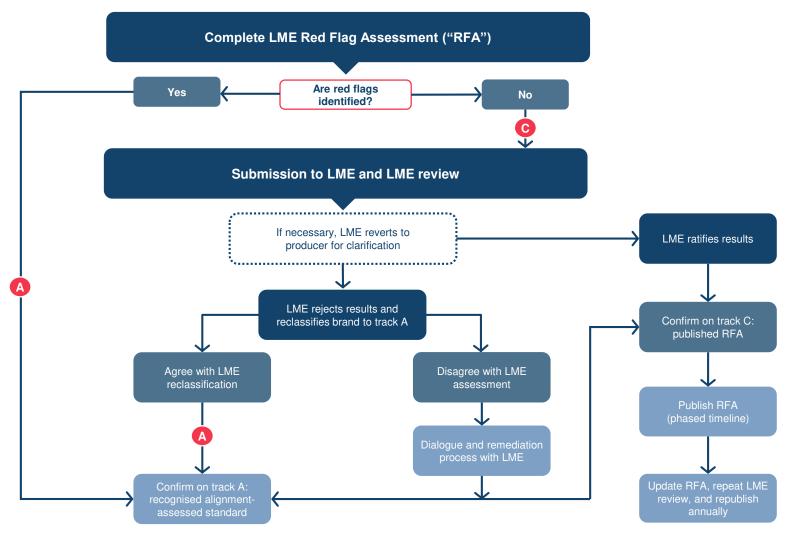


Track B: Audited LME RFA process





Track C: Published LME RFA process





Timeline for implementation and compliance

Action	Tracks to OECD compliance		
	A: Recognised alignment- assessed standard track	B: Audited LME RFA track	C: Published LME RFA track
First reporting period	N/A (reporting periods will be as prescribed by standard)	1 Jan 2021 to 31 Dec 2021	1 Jan 2021 to 31 Dec 2021
		NB: first year reporting period can be shortened to align with annual reporting of the producer e.g. to cover period 1 Jan 2021 to 31 Mar 2021 only	
First reporting date	30 Jun 2022 Submit confirmation will be track A brand, and proposed standard	30 Jun 2022 Submit audit results	30 Jun 2022 Submit RFA template
Standard to be accepted as recognised alignment-assessed standard	31 Dec 2022	N/A	N/A
Audit of brand to standard to be completed	31 Dec 2023	N/A	N/A
Transparency	As prescribed by standard	31 Dec 2022 Step 5 reporting	31 Dec 2022 + 2023 – summary statistics 31 Dec 2024 + 2025 – anonymised reports 31 Dec 2026 onward – attributed reports
Update frequency	As prescribed by standard	RFA updated (with audit and Step 5 reporting) annually	RFA updated (with LME review and publication) annually
ISO 14001 and OHSAS / ISO 45001 (or equivalent certificates programmes) certifications completion	31 Dec 2023 (Certification programmes to be accepted as equivalent certification programmes by this date) (and updated on timeline prescribed by certification programmes)		



Phased transparency for LME RFA track

Publication date	RFA results	
31-Dec-22	Y1	Summary statistics
31-Dec-23	Y2	Summary statistics
31-Dec-24	Y3	Anonymous versions
31-Dec-25	Y4	Anonymous versions
31-Dec-26	Y5 and onwards	Attributed versions

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