

Kennecott Utah Copper LLC

Conflict Free Minerals Policy

Kennecott Utah Copper, LLC (Kennecott) 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 to corporate responsibility. These principles include our commitment to legal compliance, respect for human rights, anti-corruption and anti-bribery and other important principles for responsibly conducting business.

Our approach to managing conflict minerals in our supply chain is consistent with the model set out in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas, the principles laid down in the Responsible Jewellery Council's Code of Practice and Chain of Custody standards and the LBMA Responsible Gold Guidance.

Kennecott 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 Kennecott produces high purity (Grade 99.99) gold bars. The copper materials entering the process are sourced from Kennecott's Bingham Canyon Mine. To supplement the input to the copper smelting process, Kennecott processes third party copper concentrates, or other copper materials. These may contain gold as an inherent part of the copper material.

Kennecott acknowledges the important concerns about the link between illegal mineral exploitation and associated human rights violations, corruption, and conflict, in conflict affected or high risk areas. We commit to producing conflict free minerals by:

- Establishing and maintaining a management system to identify and manage risks, maintain a chain of custody, and receive and address enquiries from interested external parties
- Establishing ongoing auditing and certification to meet relevant industry requirements.

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



Marc Cameron
Managing Director

13 February 2017