IRM

Initiative for Responsible Mining Assurance



Instruction Manual for Auditors

MINE MEASURE:

responsible mining self-assessment and audit preparation tool

July 2021

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IRMA Fundamentals

IRMA is a voluntary certification system **for large-scale mines**

The IRMA Standard for Responsible Mining

- Best practice requirements on 26 topics – a comprehensive and rigorous mining standard
- Standard was developed through a robust multistakeholder process

2. A third-party, independent assurance system

- Auditors external to the mining company evaluate whether a mine is meeting the IRMA requirements
- The audits include site visits and input from rights holders, mine workers and stakeholders

IRMA Standard for Responsible Mining

Comprehensive coverage of mining issues – 26 chapters grouped under four principles

Business Integrity

- Legal compliance
- Stakeholder
 engagement
- Human rights due
 diligence
- Stakeholder complaints
 mechanism
- Revenue and payments transparency / anti-corruption

Planning for Positive Legacies

- Env. and social impact
 assessment and
 management
- Free, Prior and Informed Consent
- Community Support
 and Benefits
- Resettlement
- Emergency
 Preparedness and
 Response
- Planning and financing reclamation and closure

Social Responsibility

- Labor rights
- Worker health and safety
- Community health and safety
- Conflict-affected and high-risk areas
- Security arrangements
- Cultural heritage
 protection
- Artisinal and smallscale mining (ASM)

Environmental Responsibility

- Water management
- Waste (tailings) management
- Air quality
- Greenhouse gas emissions
- Noise management
- Biodiversity, ecosystem services and protected areas
- Cyanide management
- Mercury management

IRMA FUNDAMENTALS

IRMA Governance

IRMA is led by a multi-sector Board, using an equitable governance model (i.e., each sector has the same voting rights).

| Mining Companies | Purchasing Companies | NGOs | Organized Labor | Affected Communities | Investors and Finance* |
|---------------------|-------------------------|-----------------------|-----------------------------|--|---|
| Anglo American | Tiffany & Co | Earthworks | United Steelworkers | First Nations Advocating Responsible Mining (Canada) | *This constituency was added in 2020 and board members are currently being |
| ArcelorMittal | Microsoft | Human Rights Watch | IndustriALL Global Union | Mining Affected Communities United in Action (South Africa) | considered. |

System Fundamentals

For industrialscale mines

Mines anywhere on the planet can participate

Applies to all mined materials

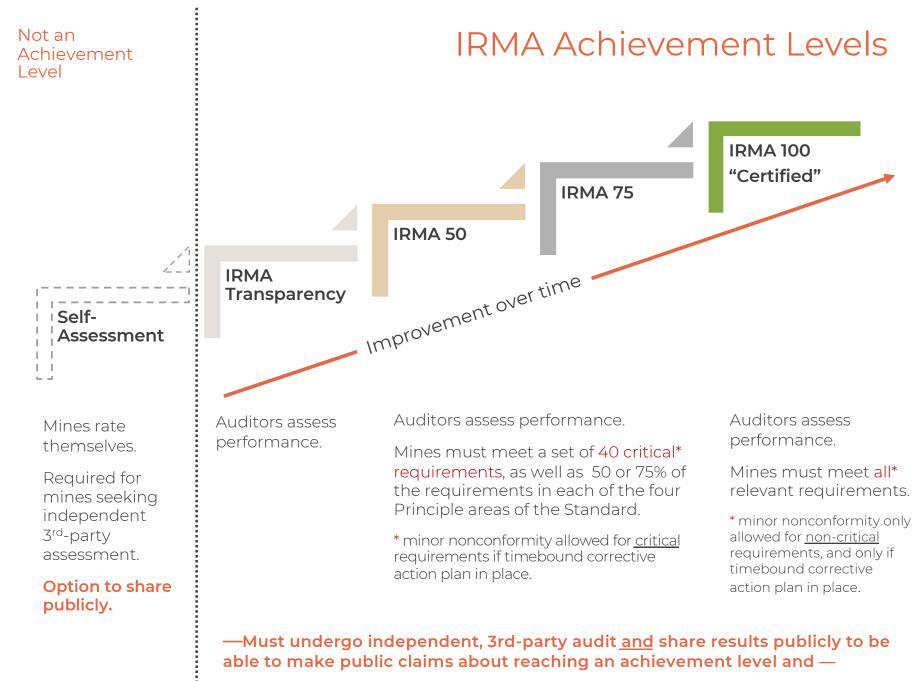
Except energy fuels such as uranium, thermal coal, oil sands, oil and gas Assessment at the mine site level

Companies aren't certified, but can put all of their mines into the system if they choose

Certification at the best practice level

But mines at any performance level can participate, and show continuing improvement over time

IRMA FUNDAMENTALS



Independent, 3rd-party Verification

Audits are in two stages:

- Stage 1 is a desk review by auditors of a mine's selfassessment results and uploaded evidence, with additional discussions with auditors as necessary
- Stage 2 is an on-site visit of facilities, meetings with site management, and interviews with workers and stakeholders

Audit Cycle:

- Mines undergo surveillance audits (a much reduced scope)
 12 - 18 months after initial audit reports are published
- Mines are re-audited every 3 years to maintain certification or other achievement level (or increase achievement level if scores improve sufficiently)

FUNDAMENTALS

RМA

Independent, 3rd-party Verification

Audit results reviewed prior to certification decision:

- Mines review draft audit results and can point out errors of fact
- Mines may choose to take up to 12 months to implement corrective actions and have them verified before audit results are finalized and released publicly
- IRMA Director of Standards and Assurance reviews draft audit report as part of IRMA's certification body oversight function

Summary of audit results made public:

- Information on mine site context, audit process, mine site scores, achievement level, and auditor ratings and comments for each requirement are included
- Mines have opportunity to request redaction of confidential or legally sensitive information from auditor comments
- Report is published on IRMA website and Responsible Mining Map

FUNDAMENTALS

RМA

Independent, 3rd-party Verification

Assessment Phases

Self-Assessment

3rd-Party Assessment

Completing the pre-audit selfassessment could take a few weeks to several months

depending on the number of relevant chapters, and the availability of critical mine site staff to fill in and upload necessary information. Audit planning and completion of Stages 1 and 2 of the independent, 3rdparty assessment could take as little as 3 - 4 months.

More time will be necessary if the mine has not adequately filled out the self-assessment.

More time may be taken if the mine wants to try to close some gaps between stages 1 and 2. Certification / Verification Decision

After Stage 2, it will take about 3 months to finalize the draft audit report..

Decision (and release of public report) may be deferred for up to 12 months if the mine opts to implement corrective actions for non-conformities (e.g., to achieve a higher performance level).

Surveillance Audit

This must take place

verification decision.

between 12 and 18

months after the

certification /



Recertification Audit

This must take place within 36 months (3 years) after the certification / verification decision.

FUNDAMENTALS

RMA



Getting Started

1. Mine Site will give you access to the tool

Different Types of Access

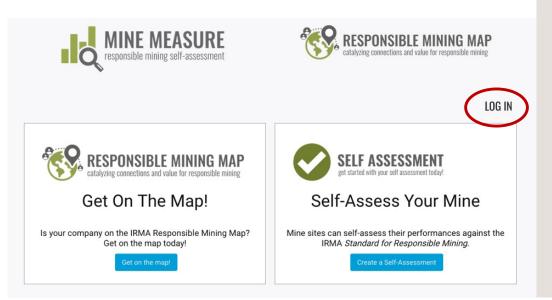
- Owners: Can access all account information (mine site profiles, selfassessments), add new users and change information
- Editors: Can add to and change information in self-assessments and mine profiles that they have permission to edit, can add other users
- Viewers: Can only view information, not change or download it
- Auditors: Can view and download information, not change it



2. Log in to your account

Go to: https://tools.responsiblemining.net/

Log in to your account (your login is your email address)



Tips

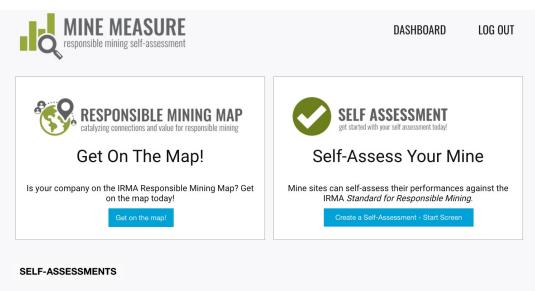
- If you failed to set up a password when you were first added to the account, go to: <u>https://tools.responsiblemining.</u> <u>net/account/reset</u>
- If you try to log in and it does not work, try this link: <u>https://tools.responsiblemining.</u> net/logout



Using The Tool

Begin the review

Auditors access the mine's self-assessement from your dashboard





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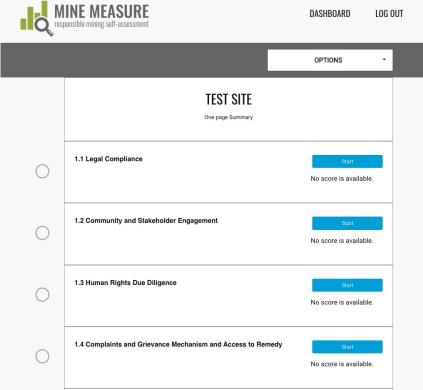
S I N O



Begin the review

Auditors will be taken to a page dedicated to the mine's selfassessment

- The summary page lists all 26 chapters of the IRMA Standard
- Mines can start with any chapter
- Multiple people can work at the same time



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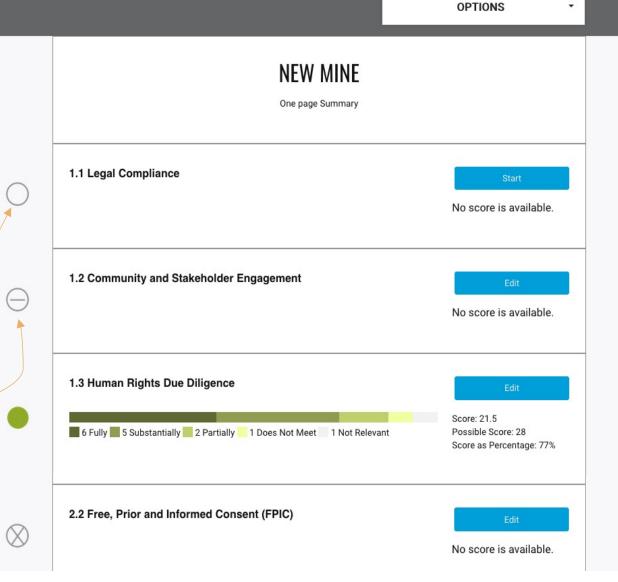




- Users always have easy access to this summary page (see page 30)
- Page shows scores, when chapters are completed, and progress on filling out the self-assessment

Legend

- Chapter not completed
- Chapter skipped_
- Chapter completed -
- Chapter not relevant





Skip this chapter

This Chapter has not been completed.

Chapter pages include:

- Link to Summary Page
- Ability to click on other chapter titles to jump directly to them
- Icons to identify the status of each chapter (completed, not relevant, etc.)

View Self-Assessment Summary

Self-Assessment Progress

- 1.1—Legal Compliance
- O 1.2-Community and Stakeholder Engagement
- O 1.3-Human Rights Due Diligence
- O 1.4-Complaints and Grievance Mechanism and Access to Remedy
- O 1.5-Revenue and Payments Transparency
- O 2.1-Environmental and Social Impact Assessment and Management
- 8 2.2-Free, Prior and Informed Consent (FPIC)
- O 2.3–Obtaining Community Support and **Delivering Benefits**
- O 2.4-Resettlement
- 2.5—Emergency Preparedness and Response
- O 2.6-Planning and Financing Reclamation and Closure
- O 3.1-Fair Labor and Terms of Work Requirements

1.2 Community and Stakeholder Engagement

This chapter has 1 critical requirement.

1.2.1. Planning and Designing Stakeholder Engagement Processes

1.2.1.1.

The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's mining-related activities.

Notes on this requirement

Fully Meets

The operating company identifies and analyses stakeholders who may be affected by or interested in the company's mining-related activities; and

The operating company has stakeholder analysis reports or equivalent; and Designated personnel are aware of the outcomes of the stakeholder analysis process.

Substantially Meets



O 2.6-Planning and Financing Reclamation

Using the Tool

| | This Chapter has not been completed. | SI | kip this chapter |
|---|--|---|---|
| Chapter pages include: | <u>View Self-Assessment</u> <u>Summary</u> | 1.2 Community and Stakeholder Engagement This chapter has 1 critical requirement. | Tips |
| Notes, which provide background on the intent of the requirement, details on what is expected, additional | Self-Assessment Progress 1.1-Legal Compliance 1.2-Community and Stakeholder Engagement 1.3-Human Rights Due Diligence 1.4-Complaints and Grievance Mechanism and Access to Remedy 1.5-Revenue and Payments Transparency | 1.2.1. Planning and Designing Stakeholder Engageme Processes 1.2.1.1. The operating company shall undertake identification and analysis of the rar groups and individuals, including community members, rights holders and of (hereafter referred to collectively as "stakeholders") who may be affected by interested in the company's mining-related activities. | Click here to read the notes on the requirement |
| definitions, links to resources, or other guidance. | 2.1-Environmental and Social Impact Assessment and Management 2.2-Free, Prior and Informed Consent (FPIC) 2.3-Obtaining Community Support and Delivering Benefits 2.4-Resettlement 2.5-Emergency Preparedness and Response | Notes on this requirement Stakeholder analysis involves a more in-depth look at stakeholder group interests, how those interests will be affected and to what degree, and what influence stakeholders could have on the project. The answers to these questions provide the basis from which to build stakeholder engagement plan. It is important to note that not all stakeholders in a particular group or sub-group will necessarily share the same concerns or have unified opinions or priorities. (IFC, 2007) | |

Variana antinitian haing undertakan hua annanu la ganata



| Progress bar at bottom of | <u>View Self-Assessment</u> <u>Summary</u> | 1.2 Community and Stakeholder Engagement This chapter has 1 critical requirement. | |
|---|---|---|--|
| page: Show how many questions you have answered, and your ratings Provides information on critical requirements Calculates your | Self-Assessment Progress 1.1–Legal Compliance 1.2–Community and Stakeholder Engagement 1.3–Human Rights Due Diligence 1.4–Complaints and Grievance Mechanism and Access to Remedy 1.5–Revenue and Payments Transparency 2.1–Environmental and Social Impact Assessment and Management 2.2–Free, Prior and Informed Consent (FPIC) 2.3–Obtaining Community Support and Delivering Benefits | 1.2.1. Planning and Designing Stakeholder Engagement Processes 1.2.1.1 The <u>operating company</u> shall undertake identification and analysis of the range of groups and individuals, including community members, <u>rights holders</u> and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's <u>mining-related activities</u>. Notes on this requirement | Tips • Highlighted terms link to definitions |
| score as soon as all questions have been answered | 2.4-Resettlement 2.5-Emergency Preparedness and Response 2.6-Planning and Financing Reclamation and Closure You have answered 16 out of a total of 16 questions You are fully or substantially meeting 1 out of 1 critics 7 Fully 4 Substantially 2 Partially | cal requirements in this chapter. 22/28 79% | |



Mines can mark chapters as not relevant:

- Users have the option to mark some but not all chapters as not relevant.
- They must provide a rationale for why the chapter is not applicable to their mine site.

| This Chapter has not been completed. | | Chapter is not relevant Skip this chapter |
|---|---|--|
| <u>View Self-Assessment</u> <u>Summary</u> | 2.2 Free, (FPIC) This chapter has 1 | CHAPTER NOT RELEVANT Please explain why you are marking this chapter as not relevant. |
| Self-Assessment Progress 1.1-Legal Compliance | 2.2.1. Policy C | ommitment |
| 1.2-Community and Stakeholder Engagement 1.3-Human Rights Due Diligence 1.4-Complaints and Grievance Mechanism and Access to Remedy | statement of the co | <u>pany</u> shall have a publicly available policy that includes a mpany's respect for <u>indigenous peoples'</u> rights, as set out in the <i>laration on the Rights of Indigenous Peoples.</i> |
| 1.5–Revenue and Payments Transparency 2.1–Environmental and Social Impact Assessment and Management | | otes on this requirement |
| 2.2–Free, Prior and Informed Consent (FPIC) | | |
| 2.3–Obtaining Community Support and Delivering Benefits | | company (or its corporate owner) has a publicly available policy that includes a |
| 2.4-Resettlement 2.5-Emergency Preparedness and | | respect indigenous peoples' rights or includes an acknowledgement of ples' rights as set out in the United Nations Declaration on the Rights of ples. |



Auditors can view the mine's rationale for rating chapters as not relevant:

 Auditors will need to ensure there is evidence to support the mine's rationale.

| This Chapter has been r | narked as not relevent. |
|-------------------------|-------------------------|
|-------------------------|-------------------------|

Rationale why chapter is not relevant

This is not relevant because there are no indigenous peoples who live within 100 km of the mine, and no indigenous peoples who have claimed that their traidtional resources have been affected by mining operations.

Chapter is not relevant Skip this cha

View Self Assessment Summary

Self-Assessment Progress

1.1-Legal Compliance

Engagement

1.2-Community and Stakeholder

1.3—Human Rights Due Diligence

1.4-Complaints and Grievance Mechanism and Access to Remedy

2.2 Free, Prior and Informed Consent (FPIC)

This chapter has 1 critical requirement.

2.2.1. Policy Commitment

2.2.1.1.

The <u>operating company</u> shall have a publicly available policy that includes a statement of the company's respect for <u>indigenous peoples'</u> rights, as set out in the *United Nations Declaration on the Rights of Indigenous Peoples*.



Mines

| This Chapter has not been complet | ed. Skip this cl | napter |
|--|---|---|
| Mines rate their performance: | 1.2 Community and Stakeholder Engagement This chapter has 1 critical requirement. | Tips |
| Users rate mine site performance by clicking on the rating that best reflects your practices. Read the small print for more information on each rating. | A.1. Planning and Designing Stakeholder Engagement Processes J.1. The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's mining-related activities. Motes on this requirement Fully Meets The operating company identifies and analyses stakeholders who may be affected by or interested in the company's mining-related activities; and | Tips Change your rating at any time by clicking on a different rating Clear an existing rating by clicking on it. |
| | Substantially Meets | |

Mines add a rationale for their self-assessment rating:

- Auditors will ask mine staff to provide justification for how a mine fully, substantially or partially meets each requirement, so adding the information as you fill out your self-assessment will make the audit process more efficient.
- Adding a rationale is important when a mine moves on to 3rd-party independent audit. However, whether doing a gap analysis or preparing for an audit, it is good practice to always add an explanation of why you believe the mine warrants a certain rating. Going through this process will help to provide a more realistic selfassessment.

Upload Evidence You may want to upload copies of policies or other documents, or add links to online documents, so that they are readily available in one place when you are ready to undergo an independent audit.

See Examples of Evidence

add links to online documents, so that they are readily available in one place when you are ready to undergo an independent audit. Note that you can also grant an auditor permission to access this information, which should reduce your audit preparation time and costs.

Name of Document and Date

Add rationale for your rating

Descriptive name, e.g., Air Monitoring Report - March2020

Upload Documents

Choose File No file choser

Add Internet Links to Online Information

http://miningcompany.com/policies

Add Notes

You can add a note by itself, or add a note that is associated with an uploaded document or link (e.g., information on relevant pages or section numbers).

Add notes here.



Tips

Be sure to save

your rationale





Add information

Auditors add their own ratings and rationale

Self-Assessment Progress

1.2–Community and Stakeholder Engagement

- 1.3—Human Rights Due Diligence
- 1.4—Complaints and Grievance Mechanism and Access to Remedy
- 1.5—Revenue and Payments Transparency
- 2.1—Environmental and Social Impact Assessment and Management
- 8 2.2—Free, Prior and Informed Consent
- (EPIC) © 2.3–Obtaining Community Support and Delivering Benefits
- 8 2.4-Resettlement
- 2.5—Emergency Preparedness and Response
- 2.6—Planning and Financing Reclamation and Closure
- 3.1—Fair Labor and Terms of Work Requirements
- 3.2—Occupational Health and Safety
- 3.3—Community Health and Safety
- 3.4—Mining and Conflict-Affected or High-Risk Areas
- 3.5—Security Arrangements
- 8 3.6—Artisanal and Small-Scale Mining
- 3.7-Cultural Heritage
 4.1-Waste and Materials Management
- 4.1–Waste and Materials Management
 4.2–Water Management
- 4.3—Air Quality
- 4.4—Noise and Vibration
- 4.5-Greenhouse Gas Emissions
- 4.6—Biodiversity, Ecosystem Services and Protected Areas
- 4.7—Cyanide Management
- O 4.8-Mercury Management

1.1.1. Compliance with Host Country Laws

1.1.1.1. (critical requirement)

The <u>operating company</u> shall comply with all applicable <u>host country laws</u> in relation to the <u>mining project</u>.



Substantially Meets

NOTE: This is a new rating category. Mines should use best judgment as to whether something is substantially versus partially met. Indicators will be added in time. See <u>IRMA Rating System</u> for general guidance on the difference between substantially and partially meeting requirements.

Partially Meets

There is evidence that the mining project is in breach of host country law(s), and there is a plan in place to carry out corrective actions to resolve the noncompliance(s) but very little progress has been made toward resolution.

NOTE: A new rating (substantially met) has recently been added. "Partially met" indicators have not yet been updated, so some may apply to the substantially met rating. Use best judgement and see "<u>IBMA</u> <u>Rating System</u>" for general guidance on the difference between substantially and partially meeting requirements.

Does Not Meet

~

There is evidence that the mining project is in breach of host country law(s), and there is no plan in place to carry out corrective actions to resolve the noncompliance(s).

Mine's rationale for rating

I believe we substantially meet this because we have not received any notifications from the government that we are out of compliance with our permits, but water monitoring data show we have exceeded allowable limits on a few occasions this year. (James) I believe we only substantially meet this because our monitoring shows that we exceeded the water quality standard three times last year. (John)

Auditor Notes

Auditor rationale for rating

Company has system in place to track non-compliance issues, but it does not appear to be working effectively. There have been



Add information

- Auditors should provide a rationale for their rating, especially if different from the mine's rating
- Auditors should record the methods used to determine the preliminary rating (e.g., review of particular evidence, any preliminary discussions with staff)
- Other fields have been added for optional use by auditors. For example key findings, or other notes and observations.
- Only auditor rationale for rating will be shown when auditors share on-line results with the mine. Other information kept private.

| Auditor Notes Auditor rationale for rating | Tips |
|---|---|
| | IMPORTANT! |
| Methods used to determine rating | Unless there is a save (or send feedback) button associated with |
| Key Findings | a box, the <mark>system saves</mark> your work as you go. |
| Other Notes | • When entering Auditor Notes be sure to <u>save</u> whenever you enter new information. |



Mines provide evidence:

- Uploading or adding links to documents, photos or videos is a critical step when preparing for a 3rd-party independent audit. This is the information that auditors will review during the Stage 1 desk review.
- Mines should add notes to auditors, for example, tell auditors what information they should be looking for and where they can find it (page numbers, section numbers). If this information is missing auditors will likely request it, which could lengthen the audit timelines.

Upload Evidence

You may want to upload copies of policies or other documents, or add links to online documents, so that they are readily available in one place when you are ready to undergo an independent audit. Note that you can also grant an auditor permission to access this information, which should reduce your audit preparation time and costs.

See Examples of Evidence

Name of Document and Date

Descriptive name, e.g., Air Monitoring Report - March2020

Upload Documents

Choose File No file chosen

Add Internet Links to Online Information

http://miningcompany.com/policies

Add Notes

You can add a note by itself, or add a note that is associated with an uploaded document or link (e.g., information on relevant pages or section numbers).

Add notes here. Save Note, or a Document or Link (With or Without an Associated Note)

Tips

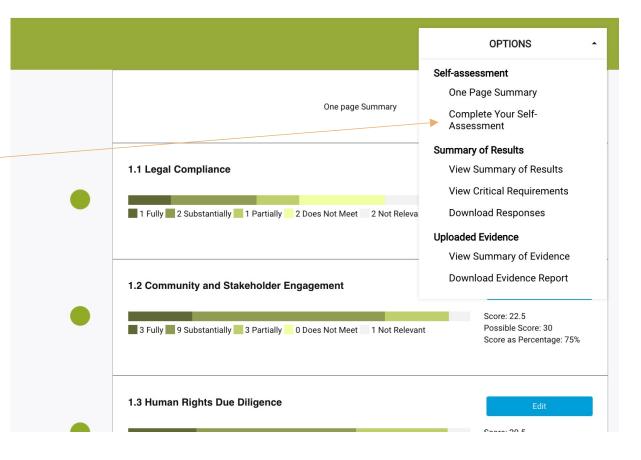
- Click to see examples of evidence
- Add a descriptive
 name for evidence (e.g., "Air Quality Monitoring Data – Site 1" rather than "Data").
- Include a
- document date (e.g., March 2020).
- Make sure to click
 on save

after you have uploaded a document. This **must be done** regardless of whether or not you add a note



Mine completes the self-assessment

- When finished filling in the self-assessment mines can "lock" it to prevent further edits, by clicking "Complete Your Self Assessment"
- Mines should do this before sharing results and information with auditors.
- Once completed, the top bar will turn red (see next page)



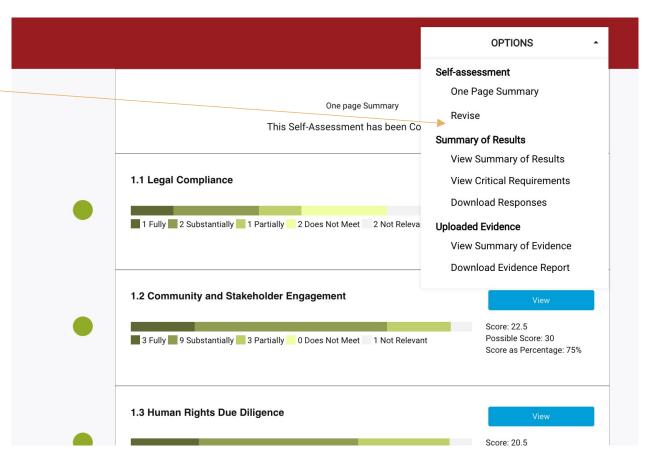
⊥ ⊢

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Mines can revise the self-assessment (optional)

- After completing a self-assessment, mines can revise the self-assessment at any time.
- The tool will recalculate scores, and updated reports will be generated to reflect changes.



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View and access evidence

Auditors can view the mine's evidence:

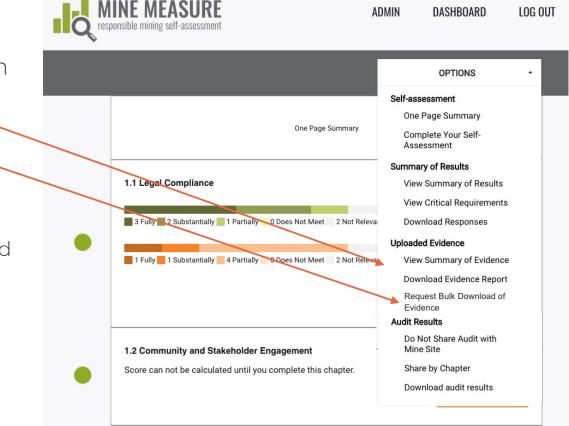
 All evidence and notes that have been uploaded by the mine for a particular requirement can be viewed.

| View List of Evidence | |
|--|---|
| FILE NAME Letter from Dept Nat Resources(2).docx NOTES Letter explains that soil contamination has been remediated as required EDIT NOTE REMOVE | Tips Click to reveal all files that have been uploaded |
| FILE NAME Letter from Dept Nat.Resources.docx NOTES Letter explains that water quality incident has been corrected EDIT NOTE REMOVE | as evidence |
| FILE NAME ComplianceAudit2018.pdf NOTES See Section 3, pages 7 and 8 for a list of environmental permits. EDIT NOTE REMOVE | |



Auditors can access ALL evidence in a variety of ways:

- Auditors can view evidence on-line, or download evidence in Excel
- Request a Bulk Download
 - To be added soon
 - Will send an email to tool administrator, and a gmail folder will be created
 - Auditors will have limited time to download materials before folder deleted





View on-line list of evidence by chapter

- View information on files uploaded as evidence in each chapter. Information is listed for each requirement.
- Hyperlinks allow auditors to download evidence files.

Full List of Self-Assessment Files

Mine Site: Mine Site Location: Self-Assessment Last Modified Date: Jul 16, 2021

1.1 Legal Compliance

This is a critical requirement.

```
1.1.1.1. The operating company shall comply with all applicable host country laws in relation to the mining project.
```

MINE'S RATING Substantially Meets

ENTRY DATE Fri, 17 Apr 2020 22:11:13 GMT

UPLOADED FILES (EVIDENCE) ComplianceAudit2018.pdf

NOTES ON FILE See Section 3, pages 7 and 8 for a list of environmental permits.

ENTRY DATE Wed, 20 Nov 2019 20:49:51 GMT

UPLOADED FILES (EVIDENCE) Letter from Dept.Nat.Resources.docx

NOTES ON FILE Letter explains that water quality incident has been corrected

ENTRY DATE Fri, 08 May 2020 12:31:53 GMT

UPLOADED FILES (EVIDENCE) Screen Shot 2020-05-08 at 6.30.15 AM.png

ENTRY DATE Thu, 28 May 2020 20:15:22 GMT

ENTRY DATE

Wed, 20 Nov 2019 20:49:11 GMT

UPLOADED FILES (EVIDENCE) Letter from Dept.Nat.Resources(2).do

NOTES ON FILE Letter explains that soil contamination has been remediated as requiredTRYING TO EDIT

1.2 Community and Stakeholder Engagement

1.2.1.1. The <u>operating company</u> shall undertake identification and analysis of the range of groups and individuals, including community members, <u>rights holders</u> and others (hereafter referred to collectively as "<u>stakeholders</u>") who may be affected by or interested in the company's <u>miningrelated activities</u>.

MINE'S RATING

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Download list of all evidence in Excel

| • • Hoi | Home Insert Draw Page Layout Formulas Data Review View Developer | | | | | 04968a6f81d64569499b8 | | | |
|------------|--|--|-----------------------------|--|----------------------------------|--|--------------------|--------------------------------|--|
| | A | K V fx B Chapter Name | c Requireme nt Number | D Requirement Text | E Evidence (document name) | F Link to evidence | G Company Notes | H Date evidence uploaded | |
| | .1 | Legal Compliance | 1.1.1.1 | The operating company shall comply with all applicable host country laws in relation to the mining project. | Legal Analysis - 2019.png | https://api.responsiblemining.net/sta tic/usercontent/files/359fdb36722d4f 4faa68df2373e153cc.png | | 2020-05-27 12:42:22 | |
| 1 | .1 | Legal Compliance | 1.1.1.1. | The operating company shall comply with all applicable host country laws in relation to the mining project. | Permit Tracking - May 2020.xlsx | https://api.responsiblemining.net/sta tic/usercontent/files/0aae12a89a244 99886e4fe1f99c96221.xlsx | | 2020-05-27 12:43:25 | |
| 1 | .2 | Community and Stakeholder Engagement | 1.2.1.1. | The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's mining-related activities. | Stakeholder Mapping - Updated 20 | https://stg-api-irma.api-nyc3- 1.viable.io/static/usercontent/files/2 6b2a24d44844855b8c5c9423314d83 c.docx | | 2019-07-23 18:53:31 | |
| 2 | .1 | Environmental and Social Impact Assessment and Management | 2.1.1.1 | An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project. | ESIA Scoping Doc.docx | https://stg-api-irma.api-nyc3- 1.viable.io/static/usercontent/files/a 1cd196d6d434a5d8738f54cf4c24968. docx | | 2019-01-30 13:58:40 | |
| 2 | .4 | Resettlement | 2.4.3.3. | In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum:a. Describe how affected people will be involved in an ongoing process of | Resettlement Action Plan_New Mi | https://stg-api-irma.api-nyc3- 1.viable.io/static/usercontent/files/9 42e031f7b0b432b8ec1cc4056b162a4 .docx | | 2019-07-23 18:35:59 | |

Tips

- Make sure to enable pop-ups so that the download can occur
- Be patient may take time to process all info into downloadable file



Share information with mine

- Auditors can share preliminary ratings with mines.
- Sharing this information can provide the basis for discussions between mines and auditors.
 - It may lead to auditor requests for additional information.
 - It may help mines identify gaps they want to fill before progressing to the onsite stage of the audit.



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Share information with mine

- Auditors can share all chapters for on-line viewing
- Auditors can select particular chapters to share for on-line viewing (see next page)
- Auditors can download results as an Excel spreadsheet and send to the mine

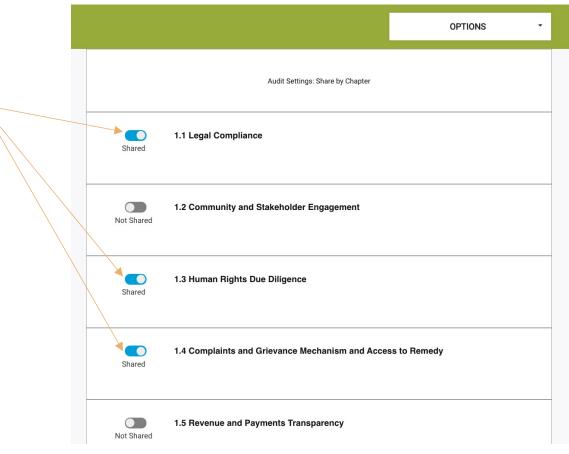


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Share information with mine

 Auditors can select particular chapters to share for on-line viewing by toggling on the chapters they wish to share.



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Tips

contact auditors

if they would like

an Excel file that

includes the

and auditor ratings (and

rationale).

mine's ratings

Mines may

Share information with mine

 When auditors share their results on-line, mines can see auditor rating, as well as auditor rationale

1.1.1. Compliance with Host Country Laws

1.1.1.1. (critical requirement)

(

 \checkmark

The <u>operating company</u> shall comply with all applicable <u>host country laws</u> in relation to the <u>mining project</u>.

Fully Meets

There is no evidence that the mining project is in breach of host country law(s), or if it is in breach there is a plan in place and corrective actions are well underway to resolve the non-compliance(s).

Substantially Meets

NOTE: This is a new rating category. Mines should use best judgment as to whether something is substantially versus partially met. Indicators will be added in time. See "IRMA Rating System" for general guidance on the difference between substantially and partially meeting requirements.

Partially Meets

There is evidence that the mining project is in breach of host country law(s), and there is a plan in place to carry out corrective actions to resolve the non-compliance(s) but very little progress has been made toward resolution.

NOTE: A new rating (substantially met) has recently been added. "Partially met' indicators have not yet been updated, so some may apply to the substantially met rating. Use best judgement and see "<u>IBMA</u> <u>Rating System</u>" for general guidance on the difference between substantially and partially meeting requirements.

Does Not Meet There is evidence that the mining project is in breach of host country law(s), and there is no plan in place to carry out corrective actions to resolve the noncompliance(s).

Rationale for your rating

I believe we fully meet this because we have not received any notifications from the government that we are out of compliance with our permits. (James) I believe we only substantially meet this because our monitoring shows that we exceeded the water quality standard three times last year. (John)

Auditor rationale for rating Does not have a system in place to track permits a

Does not have a system in place to track permits and ALL relevant host country laws.

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Share information with mine

- If requested by mines, auditors can share Excel files (some mines prefer to view information offline)
- Auditors can choose which columns of information to share (delete the information before sending)

| | A | В | С | D | E | F | G | н | I | J | K |
|---|-------------------------|------------------|---|--------------------------|-------------------------|---|--|-------------------------|--|-----------------------|---|
| 1 | Chapter | Requirement # | Requirement Text | Critical Requirement? | Rating | Company Rationale | What you can do to meet the requirement | Audit Rating | Audit Rationale | Audit Key Findings | Audit Notes |
| 2 | 1.1 Legal Compliance | 1.1.1.1 | The operating company shall comply with all applicable host country laws in relation to the mining project. | Yes | fully_meets | We do have a system in place for tracking compliance obligations and monitoring compliance. Please see new document uploaded in evidence. | There is no evidence that the mining project is in breach of host country law(s), or if it is in breach there is a plan in place and corrective actions are well underway to resolve the non- compliance(s). | substantially_ meets | The mine has several legal non-compliance issues (E.g., does not have adequate ventilation, exceeded water quality standards more than 20 times in the past two years and has not taken steps to correct the root cause), and there is no evidence that the company has a system in place to track all compliance obligations and monitoring compliance. | | Some private notes here you may not want to shar |
| | 1.1 Legal Compliance | 1.1.2.1. | The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA | No | substantially _meets | | Where there are conflicts between host country laws and IRMA requirements the operating company can provide evidence that meeting IRMA would require it to violate host country law; andThe company can demonstrate that | substantially_ meets | | | |

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Auditors

Send feedback to IRMA

- For each requirement, auditors can provide IRMA with feedback:
 - Ask IRMA to clarify the intent or meaning of a requirement
 - Inform IRMA about any requirement they do not believe are relevant for their circumstances
 - Submit other comments
- IRMA will respond to all questions or requests for clarification. Other comments will be documented and will feed into system improvements

Provide Feedback

We are interested in hearing your feedback on this requirement. Please let us know if the requirement is unclear, if you feel we are using the wrong metric(s), or any other input you'd like to provide on this requirement.

Send Feedback to IRMA

Tips

• Unless there is a save (or send feedback) button associated with a box, the system saves your work as you go.

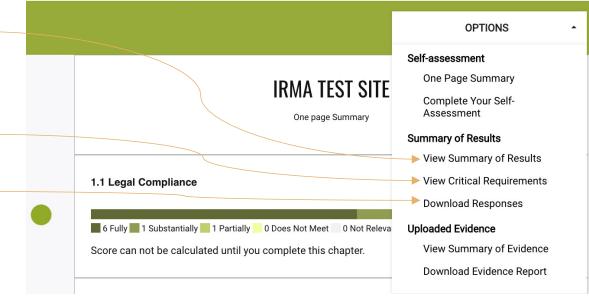




Data Summaries and Reports

Full Summary of Results

- View a full summary of your self-assessment results
- View of summary of performance on critical requirements only
- Download a full summary of your selfassessment results



UMMA



Data Summaries and Reports

View full summary of results

 Users see a list of chapters, scores for completed chapters, and which chapters have been skipped or marked as not relevant

Planning for Positive **Business Integrity** Social Responsibility **Environmental Responsibility** Legacies 1.1 Legal Compliance Score: 2.1 Environmental and Score: 3.1 Fair Labor and 4.1 Waste and Score: Score: 10/12 Social Impact 48/58 Terms of Work 61/68 Materials Management 40.5/56 Assessment and Requirements 83.33% Management 82 76% 89 71% 72 32% 1.2 Community and Score: 2.3 Obtaining Score: 3.2 Occupational 4.2 Water Score: Score: Stakeholder 19.5/32 Community Support 11/16 Health and Safety 39.5/46 26.5/38 Management and Delivering Benefits Engagement 60.94% 68.75% 85.87% 69.74% 1.3 Human Rights Due 2.4 Resettlement 3.3 Community Health 4.3 Air Quality Score: Score: Score: Score Diligence 22.5/26 12/16 and Safety 14.5/18 12/18 86.54% 75.00% 80.56% 66.67% 1.4 Complaints and Score: 2.5 Emergency Score: 3.4 Mining and Score: 4.4 Noise and Score: Grievance Mechanism Preparedness and 7.5/10 Conflict-Affected or Vibration 9/12 17.5/22 4/4 and Access to Remedy Response High-Risk Areas 75.00% 79.55% 75.00% 100.00% 2.6 Planning and 4.5 Greenhouse Gas 1 5 Revenue and Score Score: 3.5 Security Score Score Payments 19/24 **Financing Reclamation** 41/54 Arrangements 24/30 Emissions 12.5/14 and Closure Transparency 79.17% 75.93% 80.00% 89.29% 3.7 Cultural Heritage Score: 4.6 Biodiversity, Score: 17/24 **Ecosystem Services** 23.5/34 and Protected Areas 70.83% 69.12% 4.7 Cyanide Score: 12.5/16 Management 78.13%

Chapters Completed (23)

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Data Summaries and Reports

View full summary of results

- Users can view a listing of the requirements that were substantially, partially or not met for each chapter.
- This provides a gap analysis, identifying requirements where work is needed to fully meet the IRMA Standard requirements.

Areas For Improvement by Chapter

The following section lists the requirements that were not met, or were only partially met, for the chapters that were completed in the self-assessment. Chapters that were skipped or were deemed not relevant are not included below.

1.1 Legal Compliance

Requirements partially met

1.1.4. Contractor Compliance

1.1.4.1. The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project.

What you can do to meet the requirement.

The operating company has policies or other documents or correspondence that convey to contractors the operating company's expectations related to environmental and social performance (and the expectations are consistent with IRMA requirements); and

Contractors are aware that they are expected to achieve a certain environmental and social performance level as required by the operating company; and

The operating company has documented evidence that contractors are complying with environmental and social requirements that are consistent with IRMA requirements.

1.2 Community and Stakeholder Engagement

Requirements not met

1.2.2. Engagement Processes

1.2.2.6. The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.

What you can do to meet the requirement.

The operating company documents engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.

Requirements substantially met

1.2.2. Engagement Processes

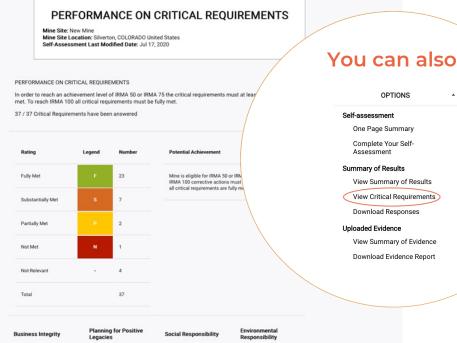
1.2.2.4. Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives.



Data Summaries and Reports

View performance on critical requirements

- Users can view a summary of how the mine performed on the critical requirements
- This may help identify requirements to focus on first, given that critical requirements must be fully or substantially met in order to reach IRMA 50 or higher.





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Data Summaries and Reports

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| A B C D E Assessment Chapter Requirement# Requirement Text Critical Requirement? Rating What you can do to Summary of Res 1.1 Legal Compliance 1.1.1.1 The operating company shall comply with all applicable host country laws in relation to the mining project. Yes substantially_meets There is no evidence to breach there is a plan compliance(s). View Critical Download Res 1.1 Legal Compliance 1.1.2.1. The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement to the extent feasible without violating the law. No partially_meets Where there are conflicts Uploaded Eviden company can den law; andThe company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law. No Plans were/are put in place and corrective actions were/are im current ones may still be underway) to resolve every non-com; compliance is use were not addressed in a timely and effective action was taken to remedy the non-compliance and to prevent No Substa | Red | oter Re | | D | | | One Page Summary |
|--|---------------|---------------------|---|----------|---------------------|--|--|
| 1.1 Legal Compliance 1.1.1. The operating company shall comply with all applicable host country laws in relation to the mining project. Yes substantially_meets There is no evidence is plan compliance(s). Download Re 1.1 Legal Compliance 1.1.2.1. The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement to the extent the operating company shall endeavor to meet the intent of the IRMA requirement to the extent to the law. No Partially_meets Plans were/are put in place and corrective actions were/are im (current ones may still be underway) to resolve every non-comproncompliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent No Substantially_meets Plans were/are put in place and corrective actions were/are im (current ones may still be underway) to resolve every non-compliance is uses were not addressed in a timely and effective action set to prevent to an evaluation to determine why corrective actions set to prevent to an evaluation to determine why corrective actions set to prevent to an to prevent to an evaluation to determine why corrective actions set to prevent to actions to prevent to ac | ompliance 1.1 | agal Compliance 1 | nequirement leat | Critical | | What you can do to | Summary of Results |
| Provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.Company can provide eviden law; andThe company can den. IRMA requirement to the extent power Download Evidence1.1 Legal Compliance1.1.3.1.If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to preventNoSubstantially_meetsPlans were/are put in place and corrective actions were/are im (current ones may still be underway) to resolve every non-compliance compliance issues were not addressed in a timely and effective active action was taken to remedy the non-compliance and to prevent | | -gar compliance 1.1 | applicable host country laws in relation to the mining | Yes | substantially_meets | breach there is a plan | View Summary of Results View Critical Requirements Download Responses |
| place, the operating company shall be able to (current ones may still be underway) to resolve every non-complete demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent carried out an evaluation to determine why corrective actions are shown as the statement of the stat | ompliance 1.1 | ≥gal Compliance 1.1 | provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating | No | partially_meets | company can provide eviden law; andThe company can den. | Uploaded Evidence View Summary of Evidence Download Evidence Report |
| response to future non-compliances. | ompliance 1.1 | agal Compliance 1.1 | place, the operating company shall be able to demonstrate that timely and effective action was | | substantially_meets | (current ones may still be underway) to compliance issues were not addressed carried out an evaluation to determine has put procedures in place to improve | o resolve every non-compliance issue; and If past no in a timely and effective manner, the company has e why corrective actions were slow or ineffective, a |
| 1.1 Legal Compliance 1.1.4.1. The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project. No substantially_meets The operating company has policies or other documents or contractors the operating company's expectations related to e performance (and the expectations are consistent with IRMA rare aware that they are expected to achieve a certain environmental a consistent with IRMA requirements. | ompliance 1.1 | egal Compliance 1.1 | takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in | No | substantially_meets | contractors the operating company's e performance (and the expectations are are aware that they are expected to a level as required by the operating com evidence that contractors are complying | expectations related to environmental and social e consistent with IRMA requirements); andContrac achieve a certain environmental and social perform apany; andThe operating company has documented |

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IRM

Initiative for Responsible Mining Assurance

MINE MEASURE responsible mining self-assessment

If you have questions, contact:

Lisa Sumi, IRMA Director of Standards and Assurance Isumi@responsiblemining.net

For more information, visit:

Self-Assessment Tool: tools.responsiblemining.net/self-assess Responsible Mining Map: map.responsiblemining.net IRMA web site: responsiblemining.net