



Communications and Claims Policy

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1. Summary of Requirements and Rules

This policy summarizes the claims that various organizations can make regarding their membership (all types of organizations and individuals), statements of verification (for mines), certificates (for mines achieving certified status), and purchasing claims (purchasers of mined materials) related to the Initiative for Responsible Mining Assurance (IRMA). The table below gives a detailed overview of which claims can be made in different communication situations. [Annex 1](#) and [Annex 2](#) provide additional information regarding the use of the IRMA membership logo and IRMA family of Trust Marks. It also gives approved messages, straplines and clarifying statements for various situations.

Caution: IRMA Corporate Logo Requests: Note that this claims policy is related to the IRMA family of Trust Marks (IRMA’s labels and related assured claims) and the IRMA member logo that may be used by IRMA members only. The IRMA corporate logo may be approved for use by various members, partners, funders and others as long as its use is not misconstrued as an endorsement by IRMA. Clarifying statements will be required to reduce the possibility of misleading statements and all IRMA logo requests must be approved by IRMA in writing and follow the IRMA branding guidelines. Send logo requests to info@responsiblemining.net

Caution: IRMA Training: Note that this claims policy is not related to communications related to completion of IRMA training courses on the Standard for Responsible Mining, auditor training or focused training on issues covered in the Standard. People who complete IRMA training are encouraged to communicate about their coursework and completion claims. To do so, please follow the guidance provided to you by your trainer or as listed on your certificate of completion provided at the end of the IRMA-led course. For questions on what you can say when trained by IRMA, please write to us at info@responsiblemining.net

A. MEMBERSHIP* IN IRMA (AND USE OF MEMBER LOGO BY ORGANIZATIONS, COMPANIES AND INDIVIDUALS)

* This table refers to claims and communications associated with membership alone and not pertaining to any procurement, mine-site achievement or other supply chain related claims, which are dealt with in subsequent tables.

Communications Channels	Communications by IRMA members
<ul style="list-style-type: none"> • Your website • Annual reports, sustainability reports • Communication materials (e.g. letters, business cards, PowerPoint presentations) • Promotional materials 	<ul style="list-style-type: none"> • Members are encouraged to use the IRMA membership logo to communicate their commitment. • Membership logo should never be used on-product or on packaging. Web sites point of sale and flyers are examples of appropriate use. • Members are encouraged to add explanations regarding what IRMA membership entails. Standard explanations are available in Annex 2. • Members should follow the general communications guidelines (Annex 1). • Members are entitled, but are not obligated, to explain their participation in the vision of IRMA and any concrete commitments or actions they have taken to date.

<ul style="list-style-type: none"> • Products (finished or raw) and their packaging • Product inserts • Product invoices 	<p style="text-align: center;">No IRMA member logo or clarifying texts on IRMA membership are allowed.</p>
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B. MINE SITES MEETING IRMA TRANSPARENCY, IRMA-VERIFIED 50 OR 75, OR 100 CERTIFIED LEVELS OF ASSURANCE (AND USE OF TRUST MARKS BY MINES)

Communications Channels	Communications by IRMA-Achieving Mines
<ul style="list-style-type: none"> • Mine or Mining Company website • Company annual reports, sustainability reports • Communication materials (e.g. letters, business cards, PowerPoint presentations) • Promotional materials • Point of Sale materials • Products (Trust Marks only if not mixed with materials from non-IRMA achieving mines) • Product packaging, product invoices, product inserts 	<ul style="list-style-type: none"> • Mines are encouraged to use the IRMA family of Trust Marks to communicate their achievement as either IRMA 50, IRMA 75 or IRMA 100 Certified. The Trust Marks may be used on mined materials or their products' sales to first buyers (i.e. from the gate of the achieving mine) ONLY if not mixed with other materials bought by the achieving mine from other mines or miners (e.g., if mixed with non-IRMA achieving mines). • Mines that comply with IRMA Transparency requirements are also encouraged to use the IRMA Transparency mark to communicate this level of recognition within the IRMA system. • Mining companies must add clarifying text to denote which specific mine is IRMA-achieving and the level of assurance achieved must match Trust Mark used. (See Annex 2 for clarifying statements related to Achievement Levels). • Mining companies may not use the IRMA Trust Mark except related to a specific achieving mine(s) and the materials from that mine (as described in the first bullet above) and must clarify this in all company-level communications if the mining company does not have 100% of its mines in the IRMA system. All mines must follow the general communications guidelines (Annex 1). • Most uses of the IRMA family of Trust Marks will require a clarifying statement. Usage of the Trust Marks and their clarifying statements must be approved in advance by IRMA. • No claims may be made of IRMA verification of performance or achievement when using the IRMA Mine Measure self-assessment tool. In 2019-2020 IRMA will allow a set of limited communications on the use of the tool, including special 'IRMA First' awarded marks if approved by IRMA. • The word 'certified' is reserved only for IRMA 100 achieving mines. • The word 'sustainable' is not allowed in any claims related to engagement in, or achievement levels in the IRMA system.
<ul style="list-style-type: none"> • Mined materials or raw products that have been mixed or processed with other materials from outside of the mine or purchased from other mines or miners • Products from other mines in the company's portfolio that have not undergone independent 3rd-party assessment by IRMA-approved certification bodies 	<p style="text-align: center;">No use of IRMA family of Trust Marks or clarifying texts allowed at the mine level (see options for mixing materials in the claims options below for purchasers of mined materials).</p>

C. COMPANIES PURCHASING MINED MATERIALS FROM IRMA-ACHIEVING MINES
(USE OF TRUST MARKS AND OTHER CLAIMS BY PURCHASING COMPANIES)

Communications Channels	Communications by Purchasers
<ul style="list-style-type: none"> • Your website • Annual reports, sustainability reports • Communication materials (e.g., PowerPoint presentations) • Promotional materials • Point of sale materials • Products 	<ul style="list-style-type: none"> • In 2020-21, as the first mines are independently audited in the IRMA system, purchasers are encouraged to communicate their desire/intention to buy mined material for an IRMA-achieving mine. IRMA encourages purchasers to become IRMA members, investing in IRMA’s programs that increase mines engaged and the opportunity to access materials coming from IRMA-verified mines. Members may use the IRMA membership logo alongside their demand/commitment. Purchasers may not indicate a product includes IRMA mined materials however unless the terms below are met. • Purchasers are encouraged to communicate they are buying mined materials from an IRMA-achieving mine (s). The Trust Marks may be used by a purchaser on products following the guidelines and assurance required in IRMA’s Chain-of-Custody policy. This includes products made from 100% mined materials from mine(s) audited in the IRMA system, and for mass balance mixing that tracks percentage of IRMA-conformant materials. • Prior to volume availability of IRMA-achieving mined material: Purchasers may make statements about commitments to purchase IRMA achieving materials but may not use the IRMA Trust Marks unless they follow the requirements in the IRMA Chain of Custody policy. For company commitments to source from future IRMA-achieving mines, there are several approved messages and clarifying statements available related to such purchasing or sourcing commitments. Write to us at info@responsiblemining.net for more information on these approved messages related to sourcing commitments.

Annex 1: General Communications Guidelines

Members of IRMA, IRMA-achieving mines, and Purchasing companies sourcing IRMA shall abide by the following communications guidelines.

1. IRMA stakeholders are encouraged to communicate about their IRMA membership, IRMA achievement, and/or purchasing commitments and plans. As such: 1) **Members are encouraged to use the IRMA membership logo** and to issue clarifying statements, as well as additional explanations regarding their participation in IRMA, 2) **IRMA-achieving mines are encouraged to use the appropriate IRMA Trust Mark and required clarifying statement** for communications about their mine and its materials, and 3) **Purchasing companies sourcing IRMA are encouraged to use the IRMA Trust Mark** to promote their supportive actions.

In doing so, they shall respect the following guidelines:

- 1.1. The name, logos and marks of IRMA shall always be used in a way that safeguards the reputation of IRMA, its members and its certificate holders.
- 1.2. The name, logos and marks of IRMA shall in no instance be used in a way that could induce a misunderstanding about the practices of the organization in question. All communications should adhere to credibility concepts of truthfulness, clarity, accuracy, and transparency.
- 1.3. The name, logos and marks of IRMA shall not be used in a way that could mislead other parties regarding IRMA or the organization in question, in particular regarding whether a product is 100% segregated or mixed with other materials.
- 1.4. IRMA is not a mining company, manufacturer or distributor of any final or intermediate products. The name, logos and marks of IRMA shall never be used in a way that could give the impression that IRMA is a supply chain actor in the mining, metals or minerals sectors.
- 1.5. All organizations other than media must obtain written approval for the use of the IRMA logos, and family of Trust Marks, prior to use. The approval can be case-specific or generic.
- 1.6. Organizations are not allowed to use any IRMA straplines or clarifying statements regarding IRMA except those in the [Annex 2](#) without written permission from IRMA.
- 1.7. No written approval is required for the use of the clarifying statements as described in [Annex 2](#) of this claims policy. However, written permission is required for any modification of these statements. Modifications are not encouraged and will only be approved in special cases.
- 1.8. No written approval is required for an organization's further additional explanations regarding its own value/interest to engage in IRMA or its sourcing of IRMA, providing it complies with IRMA overall guidelines and stays accurate/consistent with the straplines and statements as described in 1.6 above and Annex 2.
- 1.9. Organizations shall, at the request of IRMA, inform IRMA about the use of its logos or

Trust Marks, clarifying statements and additional explanations (i.e. the text used and the type of communication materials to which the text is applied).

- 1.10. Members may only communicate about their membership in case of continued good-standing with regard to membership agreements and fees.
- 1.11. IRMA-achieving mines may only communicate about their verified or certified level of IRMA assurance in the case of a valid certificate or verified statement of achievement from an IRMA-approved Certification Body. Mines recognized within the IRMA Transparency level may only communicate about that status if they have a valid letter of recognition from and IRMA-approved Certification Body.
- 1.12. IRMA encourages purchasers to explain their commitments to purchase or source responsibly mined materials from IRMA-achieving mines but may not use the IRMA Trust Marks in relation to these commitments or targets. Several approved messages and clarifying statements are available related to purchasing or sourcing commitments. Write to us at info@responsiblemining.net for more information on these approved messages.
2. No IRMA Trust Marks or logos are allowed related to use of the IRMA Mine Measure self-assessment tool. Companies are allowed to communicate that they are using the self-assessment tool. In 2019-2020 IRMA is allowing a set of limited communications on the use of the self-assessment tool, including special 'IRMA First' awarded marks. These may only be used if offered by and approved by IRMA.
3. No IRMA Trust Marks other than the IRMA Transparency mark are allowed related to scores at the IRMA Transparency Level.
4. The word 'certified' is reserved only for IRMA 100 achieving mine.
5. The word 'sustainable' is not allowed in any claims related to engagement in, or achievement levels in the IRMA system.

Annex 2: Approved Messages and Clarifying Statements for IRMA Achieving Levels

IRMA Members (Companies, Organizations, Individuals in any sector and that are members of IRMA)

- ABC Company (or Organization or Individual or etc.) is a member of IRMA, the Initiative for Responsible Mining Assurance. We support the vision of a world where the mining industry respects the human rights and aspirations of affected communities, provides safe, healthy and supportive workplaces, minimizes harm to the environment, and leaves positive legacies.
- ABC Company (or Organization or Individual or etc.) is a member of IRMA, the Initiative for Responsible Mining Assurance. This means we are participating in and supporting credible independent third-party verification and certification against a comprehensive best-practice standard that addresses the full range of environmental and social issues related to industrial-scale mines.
- [Specifics of the organization’s participation or engagement can be added by the member.]

IRMA-Achieving Mines at 50, 75 and 100

- **50 Level Only:** ABC’s Galaxy Mine has achieved an average score of 50% or higher in all four principle areas of the IRMA Standard (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility). Verified within this score is that the mine meets, or has an approved timebound plan to meet, a set of critical requirements for protecting social and environmental values.
 - **NOTE: there is no use of the word ‘certified’ for the IRMA 50 level.**
- **75 Level Only:** ABC’s Galaxy Mine has achieved a score of at least 75% in all four principle areas of the IRMA Standard (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility). Verified within this score is that the mine meets, or has an approved timebound plan to meet, a set of critical requirements for protecting social and environmental values.
 - **NOTE: there is no use of the word ‘certified’ for the IRMA 75 level.**
- **100 Level Only:** ABC’s Galaxy Mine has been independently assessed and found to reach the “IRMA 100 Certified” level of performance against the Standard for Responsible Mining. This means Galaxy has met a set of critical requirements and has fully met, or has an approved timebound plan to fully meet, all other relevant requirements in the *Standard for Responsible Mining*.
- **Approved Strapline and Message for IRMA 100 Certified Achieving Mines Only:** (Strapline placed under 100 Trust Mark).
 - ABC’s Galaxy Mine is IRMA Certified.
 - ABC’s Galaxy Mine is an IRMA-Certified mine.
 - ABC’s Galaxy Mine is an IRMA-Certified-100 mine.

Caution: Use of the phrase ‘responsible mine.’

If using these words in your communications, they **must not be linked to IRMA mine-site achievement or made part of the IRMA assured claim without explicit permission from IRMA.**

They can be used however, in terms of the concept itself, progress towards, other company or mine site actions, or related to the IRMA *Standard for Responsible Mining* and IRMA’s mission to further responsible

Purchasers of Mined Materials from IRMA-Achieving Mines

- **Approved Straplines for 50, 75 and 100 Trust Marks only if verified against IRMA’s Chain of Custody Standard (and with associated variations based on whether the material is “identity preserved” from one IRMA-achieving mine, “segregated” from more than one IRMA-achieving mine, or mass balance where material from one or more IRMA-achieving mines has been mixed with material not reviewed by IRMA):**
 - **50:** The [NAME OF MATERIAL] in this [TYPE OF PRODUCT] came from a mine that has been independently verified against the internationally recognized *Standard for Responsible Mining* and has achieved a score of at least 50% average in each of four principle areas (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility).
 - Optional additional sentence for 50 level (add on only, cannot be used alone): By purchasing IRMA-verified-50 materials we are directly supporting a healthier planet and an improved quality of life in communities affected by mining.
 - **75:** The raw materials in this product came from a mine that has been independently verified against the internationally recognized *Standard for Responsible Mining* and has achieved a score of at least 75% average in each of four principle areas (i.e., Business Integrity, Planning for Positive Legacies, Social Responsibility and Environmental Responsibility).
 - Optional additional sentence for 75 level (add on only, cannot be used alone): By purchasing IRMA-verified-75 materials we are directly supporting a healthier planet and an improved quality of life in communities affected by mining.
 - **100:** The raw materials in this product came from a mine that has been independently certified against the internationally recognized *Standard for Responsible Mining* and has achieved the highest level of achievement.
 - Optional additional sentence for 100 level (add on only, cannot be used alone): By purchasing IRMA-certified-100 materials we are directly supporting a healthier planet and an improved quality of life in communities affected by mining.
 - **Mixing of materials:** Review IRMA’s Chain of Custody policy for approved claims when mixing materials from more than one IRMA-achieving mine (including some which may have different achievement levels), or when mixing using a mass balance approach where materials from IRMA-achieving mine(s) are being mixed with mined materials from other non-IRMA-verified sources. In brief, when mixing from IRMA-verified mines with more than one achievement level (e.g., IRMA 50 and IRMA 75), the lowest level must be used, although a statement made be added (e.g., mines meeting at least IRMA 50); when mixing with non-IRMA verified material, following the Chain of Custody policy for tracking mass balance percentages and making claims accordingly.

IRMA Background Language for Context on Mine Achievement and Sourcing

The following language may be paired with language specific to the achievement of a mine or the purchase of IRMA-verified mined materials, to provide context on the IRMA system and the commitment/achievement associated by engaging in this system:

Mines that engage in IRMA’s independent mine site auditing are reviewed against the most comprehensive, rigorous, equitable, detailed and transparent mining standard in the world – a standard

that has 26 chapters and more than 400 requirements related to the environmental and social issues most relevant at mine sites.

1. No other sustainability standards system in mining conducts its audits as rigorously and has as much credibility among stakeholders. The audit takes place at the site of the mine over days not hours and uses the tool of independent third-party certification. No other standards system compiles its reports by reaching out as extensively to the mine's various stakeholders and by interviewing both affected communities and mine workers.
2. IRMA's public audit reports provide the most information, with the most detail, about a mine's performance against the whole range socioeconomic and environmental issues, including providing chapter-by-chapter scores, and listing which requirements have not been met, so that diverse stakeholders – the mining company itself, customers, investors, workers, the nearby and downstream/wind communities -- can see where both achievements and risks exist. This also allows the mining company to speak both to strengths and challenges and make commitments to improve.
3. No other industrial mining standard has been developed through such a comprehensive, multistakeholder and public process, and no other has the sort of equitable governance where decision making is shared equally between the private sector and civil society, with leadership seats for both mine workers and local communities.
4. Mines that engage in IRMA are signaling to investors and purchasers that they are willing to step into a review as described above, and to share publicly their achievements as well as their challenges. Most modern societies use mined materials, and we know that the extraction, use, and reuse/recycling/disposal come with impacts. A world of informed diverse stakeholders can create incentives, innovation and market value for more responsible practices. Mines who engage in IRMA are demonstrating a willingness to be transparent about performance – both achievements of which they're proud and challenges they face. This provides them also with a platform to make commitments for improvement over time.
5. Regardless of a mine's achievement score against the IRMA *Standard for Responsible Mining* the factors above mean that mines independently reviewed within the IRMA program offer a greater quantity of information on environmental and social responsibility, more robustly verified, and measured against a more rigorous definition of best practices in mining than if measured by other current voluntary responsible mining programs.
6. Purchasers and investors who encourage and incentivize mining companies to engage in IRMA's independent third party audit review, and transparent sharing of results, support responsible sourcing/investing goals by using a system (as described using the text in numbers above) to create market value for more responsible mining. This can be described to align with a purchaser/investor's commitment on key topics such as forwarding human rights, reducing greenhouse gas emissions, protecting water resources, respecting indigenous people's free, prior and informed consent, protecting biodiversity, forwarding safe management of mine waste

(tailings and more), supporting community engagement, etc. [You may contact IRMA about other topics covered in the IRMA *Standard for Responsible Mining*.]

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