

Excerpt from the DRAFT Standard for Responsible Mining and Mineral Processing 2.0

Chapter 1.XX – Mineral Supply Chain and Responsible Sourcing

Context & Disclaimer on IRMA DRAFT Standard 2.0

IRMA DRAFT Standard for Responsible Mining and Minerals Processing 2.0 is being released for public consultation, inviting the world to join in a conversation around expectations that drive value for greater environmental and social responsibility in mining and mineral processing.

This draft document invites a global conversation to improve and update the 2018 IRMA Standard for Responsible Mining Version 1.0. It is not a finished document, nor seeking final review, but rather is structured to invite a full range of questions, comments and recommendations to improve the IRMA Standard.

This IRMA DRAFT Standard for Responsible Mining and Minerals Processing (v.2.0) has been prepared and updated by the IRMA Secretariat based on learnings from the implementation of the Standard (v.1.0), experience from the first mines independently audited, evolving expectations for best practices in mining to reduce harm, comments and recommendations received from stakeholders and Indigenous rights holders, and the input of subject-specific expert Working Groups convened by IRMA in 2022.

IRMA's Standard has a global reputation for comprehensive in-depth coverage addressing the range of impacts, as well as opportunities for improved benefit sharing, associated with industrial scale mining. This consultation draft proposes a number of new requirements; some may wonder whether IRMA's Standard already includes too many requirements. The proposed additions are suggested for a range of reasons (explained in the text following), including improving auditability by separating multiple expectations that were previously bundled into a single requirement, addressing issues that previously weren't sufficiently covered (e.g. gender, greenhouse gas emissions), and providing more opportunities for mining companies to receive recognition for efforts to improve social and environmental protection.

Please note, expert Working Groups were created to catalyze suggestions for solutions on issues we knew most needed attention in this update process. They were not tasked to come to consensus nor make formal recommendations. Their expertise has made this consultation document wiser and more focused, but work still lies ahead to resolve challenging issues. We encourage all readers to share perspectives to improve how the IRMA system can serve as a tool to promote greater environmental and social responsibility, and create value for improved practices, where mining and minerals processing happens.

The DRAFT Standard 2.0 is thus shared in its current form to begin to catalyze global conversation and stakeholder input. It does not represent content that has been endorsed by IRMA's multistakeholder Board of Directors. IRMA's Board leaders seek the wisdom and guidance of all readers to answer the questions in this document and inform this opportunity to improve the IRMA Standard for Responsible Mining.

IRMA is dedicated to a participatory process including public consultation with a wide range of affected people globally and seeks feedback, comments, questions, and recommendations for improvement of this Standard. IRMA believes that diverse participation and input is a crucial and determining factor in the effectiveness of a Standard that is used to improve environmental and social performance in a sector. To this end, every submission received will be reviewed and considered.

The DRAFT Standard 2.0 is based on content already in practice in the IRMA Standard for Responsible Mining Version 1.0 (2018) for mines in production, combined with the content drafted in the IRMA Standard for Responsible Mineral Development and Exploration (the 'IRMA-Ready' Standard – Draft v1.0 December 2021) and in the IRMA Standard for Responsible Minerals Processing (Draft v1.0 June 2021).

Chapter Structure

BACKGROUND

Each chapter has a short introduction to the issue covered in the chapter, which may include an explanation of why the issue is important, a description of key issues of concern, and the identification of key aspects of recognized or emerging best practice that the standard aims to reflect.

OBJECTIVES/INTENT STATEMENT

A description of the key objectives that the chapter is intended to contribute to or meet.

SCOPE OF APPLICATION

A description of the conditions under which the chapter may or may not be relevant for particular mines or mineral processing sites. If the entity can provide evidence that a chapter is not relevant, that chapter will not need to be included in the scope of the IRMA assessment. A

TERMS USED IN THIS CHAPTER

This is a list of the terms used in the chapter ■ Each term is separated with ■

Terms listed here are identified in the chapter with a <u>dashed underline</u>. And they are defined in the <u>Glossary of Terms</u> at the end of the chapter.

requirement is 'not relevant' if the issue to which a requirement relates is not applicable at the site. For example, requirements related to the use of cyanide would not be relevant at a site at which cyanide is never used.

Chapter Requirements

X.X.X. These are criteria headings

X.X.X.X. And these are the requirements that must be met for an IRMA assessment to be issued and subsequently maintained by a site. Most criteria have more than one requirement. All requirements must be met in order to comply fully with the criterion.

- a. Some requirements consist of hierarchical elements:
 - i. At more than one level.
 - ii. Operations may be required to meet all elements in a list, or one or more of the elements of such a list, as specified.

NOTES

Any additional notes related to the chapter and its requirements are explained here.

GLOSSARY OF TERMS USED IN THIS CHAPTER

Terms used in the chapter are defined here.

ANNEXES AND TABLES

Annexes or Tables are found here.

IRMA Critical Requirements

The 2018 IRMA Standard for Responsible Mining v. 1.0 includes a set of requirements identified as being critical requirements. Operations being audited in the IRMA system must at least substantially meet these critical requirements in order to be recognized as achieving the achievement level of IRMA 50 and higher, and any critical requirements not fully met would need to have a corrective action plan in place describing how the requirement will be fully met within specified time frames.

The 2023 updates to the 2018 Standard may edit some critical requirements in the process of revising and therefore there will be a further review specific to the language and implications of critical requirements that follows the overall Standard review.

Associated Documents

This document is an extract of the full DRAFT IRMA FOR RESPONSIBLE MINING AND MINERAL PROCESSING (Version 2.0) – DRAFT VERSION 1.0, released in October 2023 for a public-comment period. The English-language full version should be taken as the definitive version. IRMA reserves the right to publish corrigenda on its web page, and readers of this document should consult the corresponding web page for corrections or clarifications.

Readers should note that in addition to the DRAFT Standard, there are additional policies and guidance materials maintained in other IRMA documents, such as IRMA's Principles of Engagement and Membership Principles, IRMA Guidance Documents for the Standard or specific chapters in the Standard, IRMA Claims and Communications Policy and other resources. These can be found on the IRMA website in the Resources section. Learn more at responsiblemining.net

Comment on the IRMA Standard

Comments on the IRMA Standard and system are always welcome.

They may be emailed to IRMA at: comments@responsiblemining.net

Additional information about IRMA is available on our website: responsiblemining.net

Chapter 1.XX (NEW)

Mineral Supply Chain and Responsible Sourcing

NOTES ON THIS CHAPTER: In the IRMA 2018 Mining Standard there is no chapter that specifically addresses the sourcing of raw materials. A chapter on Mineral Supply Chain and Responsible Sourcing was proposed as Chapter 1.6 in the 2021 draft IRMA Mineral Processing Standard.¹

CHAPTER NOT YET OPENED FOR PUBLIC COMMENT

The IRMA Board of Directors has not yet agreed on a set of criteria and requirements for such a chapter, and is proposing to convene an Expert Working Group to better elucidate current best practices and to help propose an approach that reflects those practices.

As part of the working group, there will also be some exploration of whether or not a chapter on mineral supply chain and responsible sourcing should be combined with the current chapter 3.4 on Conflict-Affected and High-Risk Areas (CAHRA), given that CAHRA due diligence is a component of responsible sourcing. (See proposed revisions to Chapter 3.4)

The intention is that a draft Chapter 1.XX will be released separately for public consultation in the next few months.

PARTICIPATE IN AN EXPERT WORKING GROUP ON THIS CHAPTER

If you are interested in participating in an Expert Working Group on Mineral Supply Chain and Responsible Sourcing, please contact IRMA's Standards Director, Pierre De Pasquale (pdepasquale@responsiblemining.net).

BACKGROUND

Responsible sourcing in the minerals sector was initially focused on minerals and metals produced in or transported through conflict-affected and high-risk areas (CAHRAs) and the need to ensure the purchase of these minerals and

metals did not contribute to conflict and human rights abuses (see Chapter 3.4 for IRMA requirements for entities that know or suspect inputs to their mineral processing operations are sourced from or travel through CAHRAs). From this starting point, responsible sourcing has expanded to include other environmental, social and governance (ESG) issues, driven by downstream supply chain members and end-users of products containing minerals and metals. Increasingly, responsible sourcing is addressed in standards and systems applicable to the minerals and metals sector, including mineral processing sites.

IRMA Chapter 1.XX intends to align and achieve consistency with other relevant systems and standards, while driving the ongoing development of best practice in a way that

TERMS USED IN THIS CHAPTER

Affected Community ■ Artisanal and Small-Scale
Mining (ASM) ■ Business Relationships ■ ConflictAffected and High-Risk Area ■ Entity NEW ■
Environmental, Social and Governance (ESG) NEW
■ Legitimate ASM NEW ■ Mineral Processing ■
Operation NEW ■ Primary Input Materials NEW ■
Project NEW ■ Serious Human Rights Abuses ■
Site NEW ■ Suppliers ■ Worker

These terms appear in the text with a dashed underline. For definitions see the <u>Glossary of Terms</u> at the end of this chapter.

does not shift unachievable or burdensome expectations onto mineral processing operations in terms of defining and managing the ESG performance of their suppliers. In this context, the focus of this chapter is on primary input materials, which are central to mineral processing activities and (in most cases) will be the most significant materials purchased from suppliers. By requiring mineral processing sites to screen and undertake due diligence on suppliers of primary input materials, IRMA expects to contribute to driving improved ESG performance in the upstream supply chain and provided added assurance to downstream supply chain members and end-users that mineral processing sites are considering ESG in their sourcing of primary input materials.

¹ IRMA. 2021. Standard for Responsible Mineral Processing. Draft version 1.0. https://responsiblemining.net/wp-content/uploads/2021/06/IRMA-Mineral-Processing-Standard-DRAFT-14June2021.pdf

OBJECTIVES/INTENT OF THIS CHAPTER

Mineral processing operations know and engage with suppliers, and increasingly source input materials from suppliers that have strong environmental, social and governance performance.

SCOPE OF APPLICATION

RELEVANCE: This chapter is only applicable to mineral processing operations (not mining operations or exploration, mining or mineral processing projects).

And the sourcing policy and due diligence requirements are only applicable to the sourcing of "primary input materials" (i.e., minerals/metal-bearing ores or concentrates) to their facilities, and not sourcing of goods and services that are more peripheral to mineral processing. Note that IRMA Chapter 2.3 now addresses procurement of goods and services (see requirements 2.3.3.6 and 2.3.3.7).

CRITICAL REQUIREMENTS IN THIS CHAPTER

None at this time.

Mineral Supply Chain and Responsible Sourcing Requirements

NOTE: Under development. See the note at the beginning of the chapter.