



# Policy on Association

Version 2023-01

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# Responsibility for these requirements

The IRMA Secretariat holds responsibility for this document and its contents.

Version No.	Date	Description of Action or Amendment
2023-01	Oct 2023	Approved by the IRMA Board of Directors

# Background

The mission of the Initiative for Responsible Mining Assurance is “to establish a multi-stakeholder and independently verified responsible mining assurance system that improves social and environmental performance.” To achieve that mission, IRMA maintains its Standard for Responsible Mining, an assurance system based on third-party independent verification, and other policies and procedures.

The IRMA system includes third-party verification of mine site performance and a membership program designed to generate and maintain long-term support of IRMA’s mission from all key stakeholder groups.

IRMA is designed to enhance performance at mine sites and believes that the transparency and information generated by audits can help mines improve performance. Mines can participate in IRMA’s audit system and no matter what their performance level relative to the IRMA Standard.

At the same time, IRMA seeks to protect the foundations of the IRMA system by excluding from association with IRMA companies involved in conduct so serious as to risk IRMA’s integrity and reputation.

This Policy on Association sets out the activities that IRMA’s Board considers violations of IRMA’s values such that, if left unaddressed, warrant exclusion from IRMA participation. The Policy also describes a process and appropriate responses where unacceptable activities are identified.

# Purpose and scope

The purpose of IRMA's Policy on Association is to protect IRMA's credibility, standing, and reputation and the integrity of its Standard and mission. It further seeks to anticipate and avoid legal and economic exposure that may come from companies or IRMA members that are involved or credibly alleged to be involved in actions that are intolerable to IRMA's Board, participants, and stakeholders.

In addition to this Policy, there are alternative, complementary mechanisms for disassociation with IRMA participants set out in other IRMA policies and procedures.<sup>1</sup>

Entities seeking association with IRMA must commit to avoiding five unacceptable activities (see definition of "unacceptable activity), and this document outlines the consequences if there is a breach to this policy (see [Section 1.0: Procedures](#)). The unacceptable activities described in this policy target serious and unremediated abuses of human rights, labor rights, the environment, as well as false claims and other misconduct within the IRMA system. The policy focuses on serious abuses to strike the appropriate balance between giving a wide range of companies the opportunity to participate in IRMA to improve their conduct and the need to protect IRMA's credibility and mission by avoiding association with entities implicated in serious abuses.

The policy applies to IRMA applicants and participants (as defined below) with one notable exception: Complaints alleging a violation of the IRMA Policy on Association that occur in relation to facilities that have been audited against the IRMA Standard for Responsible Mining are expected to follow the resolution processes outlined in IRMA's Issues Resolution System Procedure.<sup>2</sup> If, however, there is evidence that the resolution pathways outlined in IRMA's Issues Resolution System have failed to remedy the unacceptable activities, then IRMA reserves the right to take action under this Policy on Association.

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<sup>1</sup> For example, IRMA's Issues Resolution Procedure enables complaints to be filed for a variety of different purposes, and in relation to a wide range of concerns. Also, IRMA's Membership Policy (available at <https://responsiblemining.net/>) requires applicants to agree to a set of principles of engagement and time-bound commitments. That policy also allows for removal of membership rights if the agreements are breached or commitments are not met.

<sup>2</sup> IRMA. January 2020. IRMA's Issues Resolution System Procedure can be found here: <https://responsiblemining.net/resources/#irma-policies-and-procedures>

# Terms and definitions

## **Accredited Auditor**

An auditor that has received training on assessing conformity with the IRMA Standard for Responsible Mining, and has been deemed competent by either IRMA or an outside accreditation body.

## **Accreditation**

Third-party attestation related to an auditor or certification body conveying formal demonstration of its competence to carry out specific conformity assessment tasks (adapted from ISO/IEC 17000:2004).

## **Applicant**

An entity that seeks to participate in the IRMA system (i.e., applies to become an IRMA member, applies to be independently verified against the IRMA Standard, registers to use the Mine Measure self-assessment tool or registers to be on the Responsible Mining Map).

## **Association**

An entity's contractual engagement with IRMA. Association with IRMA can occur through, but is not limited to: an IRMA Membership Agreement; an IRMA Participation Agreement; or an IRMA-Certification Body agreement.

## **Board of Directors or Board**

The IRMA Board of Directors.

## **IRMA Risk Management Committee**

An IRMA Board of Directors-appointed body authorized to implement procedures to inform decisions related to IRMA's Policy on Association. The Risk Management Committee is appointed by IRMA's Board of Directors. The Risk Management Committee shall be made up of at least three members of IRMA's board. There is no limit to how long an individual can serve on IRMA's Risk Management Committee, but the Board of Directors should review the composition of committee annually.

At any point in its investigation and consideration of a specific company, the Risk Management Committee can, at its discretion, decide to replace one or more of its members with a different IRMA Board member, including in cases of conflict of interest between a Board Member and the company implicated in potentially unacceptable conduct.

The Risk Management Committee may ask members of IRMA's Secretariat, or an external consultant or advisor, to assist in obtaining, documenting and evaluating factual information related to the allegation of unacceptable activity. The Risk Management Committee determines if applicants or participants have met IRMA's Policy on Association, and makes recommendations to the IRMA Board on association, disassociation, re-association, probation or no action.

## **Certification Body**

Also known as a conformity assessment body, is a body that performs auditing and conformity assessment services to determine if specified requirements are fulfilled (in this case conformity with the IRMA Standard for Responsible Mining). (Adapted from ISO/IEC 17000:2005).

## **Disassociation**

Termination of all formal relationships, such as contractual agreements including membership, licenses and certificates, between IRMA and an IRMA participant (and is also used herein to refer to situations where IRMA declines to associate with an applicant or

participant). This includes relationships with any parent or sister companies, or subsidiaries in which the entity has a controlling interest or functional or operational control.

### **Entity**

An individual person or an organization (e.g., company, mine site, industry association, non-governmental organization, government).

### **Independently Audited**

Accredited auditors or certification bodies have carried out an assessment of a mine site's conformance with all or part of the IRMA Standard for Responsible Mining.

### **Involvement**

Means either direct involvement (the IRMA participant or applicant is responsible first-hand for unacceptable activities) or indirect involvement (the IRMA participant or applicant has a relationship with a third-party that is directly involved in an unacceptable activity).

Third parties include:

- An entity in which the IRMA participant or applicant has a controlling interest (e.g., a subsidiary, joint venture) or functional or operational control (e.g., a contractor, joint venture); and
- An entity that functionally or operationally controls an IRMA participant or applicant (e.g., a parent corporation).

For purposes of this Policy on Association, involvement expressly includes the actions of a controlling partner company(s) or parent company(s).

### **Participant**

An entity that has been accepted into the IRMA system and has paid appropriate fees and dues (e.g., an IRMA member from any stakeholder group, a mining company with a mine site that has been or is in the process of being independently audited, an entity that is using the Mine Measure self-assessment and audit preparation tool,<sup>3</sup> a private sector purchaser of mined materials making Chain of Custody claims of sourcing materials from IRMA-audited mines<sup>4</sup>), or an entity that otherwise has a contractual agreement with IRMA (e.g., a Certification Body and its auditors) or other formal affiliation (e.g., an organization with whom IRMA has signed a Memorandum of Understanding to collaborate).

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<sup>3</sup> Note that self-assessment tool users can use Mine Measure confidentially. However, if false claims of performance are brought to IRMA's attention IRMA reserves the right to publicly disassociate from that company. <https://tools.responsiblemining.net/self-assess>

<sup>4</sup> This will be applicable once the IRMA Chain of Custody Standard comes into effect.

## Probation

Occurs when an entity already associated with IRMA has contravened the IRMA Policy on Association, and a decision is made by the IRMA Board of Directors to impose a set of time-bound conditions that must be met or else disassociation will occur. During a probationary period, there is no change in the entity's contractual relationship(s) with IRMA.

## Re-association

The renewal of contractual relationships (e.g., membership and licenses) between IRMA and a disassociated participant (and other affected entities such as subsidiaries).

## Unacceptable Activity

An activity that is not consistent with the spirit and/or letter of IRMA's mission and that presents unacceptable risks to IRMA. This may include both overt or covert actions and the failure to take action. Unacceptable activities include:

- Serious and unremediated violation of any of the eleven fundamental International Labour Organization conventions<sup>5</sup>
- Serious and unremediated violation of human rights.<sup>6</sup>
- Serious and unremediated harm to the environment.
- Serious breaches of ethical business practices, including illegal activities and/or corrupt practices.
- False claims related to the IRMA system.<sup>7</sup>
- Intentional use of false information to do harm to others engaged in IRMA's system and processes.

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<sup>5</sup> A list of the fundamental ILO conventions is available at: <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>.

<sup>6</sup> Human rights as defined by Universal Declaration of Human Rights of the United Nations. (<http://www.un.org/en/universal-declaration-human-rights/>). Companies' human rights responsibilities are set out in the United Nations Guiding Principles on Business and Human Rights, [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

<sup>7</sup> For example, self-assessing mines cannot claim that IRMA or an independent third party has verified that they have reached an IRMA achievement level; independently audited mines cannot claim that they have reached an achievement level above what was verified by auditors; purchasers cannot claim to source IRMA materials if these materials have not undergone a third-party independent audit and/or transactions have not been verified as per IRMA's Chain of Custody Standard (which will become effective in 2021); and IRMA members cannot claim that IRMA membership means that they are responsible actors in the mining or mineral products sector.



# 1. Procedures

IRMA's Policy on Association procedures are largely "responsive," meaning they are taken by IRMA in response to an independent, credible assertion that an IRMA participant or applicant has violated the Policy on Association. As the system expands and IRMA's capacity for review increases, we may expand the "proactive" procedure components in 1.1.<sup>8</sup>

## 1.1 Proactive Procedures

IRMA application processes (e.g., for membership, use of Mine Measure, independent auditing) require applicants to sign a statement that the applicant understands the rules, principles and other guidelines of engagement in IRMA (e.g. in using the self-assessment tool, membership, independent auditing, making claims of sourcing from IRMA-achieving mines, etc.) and the applicant declares that it is not involved, directly or indirectly, in unacceptable activities that could pose a threat to IRMA's reputation and resources, and that it agrees to avoid being involved in unacceptable activities as long as its relationship with IRMA exists. (See Self Declaration forms in [Appendix 1](#) and [Appendix 2](#)).

In addition to requiring applicants to sign the Self Declaration form, the IRMA Secretariat will, where it identifies a risk that an applicant may be in violation of the Policy on Association, inform the Risk Management Committee. The Risk Management Committee, if it determines that the Secretariat has identified a credible risk that the applicant has acted in a manner that could reasonably be concluded to violate IRMA's Policy on Association, initiate an investigation in accordance with the Responsive Procedures set out in 1.2.

## 1.2 Responsive Procedures

Any individual or interested party may file a complaint alleging that an applicant or participant in the IRMA system has violated IRMA's Policy on Association. Those wishing to file such a complaint are required to fill out a Stakeholder Complaints Form and submit it to the IRMA Secretariat.<sup>9</sup>

The complaint will be reviewed by the IRMA Secretariat, and, as per IRMA's Issues Resolution System Procedures,<sup>10</sup> the Secretariat will initiate a dialogue with the complainant regarding the issues raised to determine if the complaint might be resolved without elevating it to the level of the IRMA Risk Management Committee. Dialogue, at this point, may involve the IRMA applicant or participant as well.

If an individual or interested party makes a credible, written claim, substantiated with sufficient details, evidence, and/or references, that an IRMA applicant or participant has acted in a manner that could reasonably be concluded to violate IRMA's Policy on Association, and the complaint cannot be resolved through dialogue with the IRMA Secretariat, then the IRMA Risk Management Committee shall investigate whether or not the action(s) described could be a violation of IRMA's Policy on Association.

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<sup>8</sup> Proactive procedures are those taken as a matter of course by and/or on behalf of IRMA. For example, IRMA might consider carrying out a due diligence screening of applicants to provide some assurance that an applicant is not violating the tenets of IRMA's Policy on Association.

<sup>9</sup> Available on the IRMA website: <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

<sup>10</sup> IRMA. January 2020. IRMA Issues Resolution System Procedures. Version 1.0. [https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System\\_2020.pdf](https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf)

The focus of the Responsive Procedure shall be the substance of the written claim, but if the investigation identifies other potential risks, then those may be considered as well.

The review process shall continue until the Risk Management Committee is satisfied that the due diligence and results are sufficient to assess the risks of the claim(s) presented and to protect IRMA. The Risk Management Committee may utilize a range of methods to collect information relevant to the claim(s) presented, but the Committee should in all cases seek a written response from the applicant that the claim is made against. The Risk Management Committee should also determine whether it is necessary to obtain additional information from the person or organization that filed the claim.

The methods and findings of the investigation shall be compiled in writing and the Risk Management Committee shall submit this documentation to the IRMA Board of Directors, along with a recommendation regarding whether any action is appropriate as a result of the due diligence, including but not limited to further investigation, monitoring, probation,<sup>11</sup> disassociation/declining association, and re-association.<sup>12</sup>

### 1.3 Board of Directors Review and Decision

The IRMA Board of Directors will be the final arbiter regarding any IRMA action, including but not limited to no further action, further investigation, monitoring, probation, disassociation/declining association or re-association. Board decisions shall be taken after full consideration of the Risk Management Committee's investigation and recommendation.

In making its decisions regarding the Policy on Association, the Board will consider relevant information, including but not limited to:

- The entity's involvement in the relevant activity(s);
- The nature and severity of the relevant activity(s);
- The impacts from and entity response(s) to the unacceptable behavior, including any efforts to remediate harms;
- The representations of interested/impacted parties.

If the Board determines that the IRMA participant's or applicant's direct or indirect involvement in an activity poses no material risk to IRMA, then the Board may decide that no action is warranted (i.e., it may choose to form an association with applicants or maintain association with a participant).

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<sup>11</sup> Including duration of probation, as well as conditions necessary to regain full association status.

<sup>12</sup> Including any conditions necessary to regain full association status.

If the Board determines that the IRMA participant's or applicant's direct or indirect involvement in an activity is inconsistent with IRMA participation and/or threatens IRMA's good name, resources, or reputation, then the Board may:

- a. Disassociate from participants or decline participation with applicants. The Board, at its discretion, may or may not decide to set out conditions that might allow for re-association if they are met
- b. Place participants on probation, which may include a commitment to specific remedial actions to address the unacceptable activity.

All IRMA Board decisions will be in writing.

### 1.3.1 Disassociation

An IRMA Board decision to disassociate from a participant or to decline associating with an applicant must identify the actions upon which its decision was predicated and provide a narrative explanation of why disassociation or declining association is appropriate. The narrative will also include any conditions for ending disassociation (i.e., for re-associating or reconsidering association with rejected applicants), if possible.

### 1.3.2 Re-association or Reconsideration of a Decision to Not Associate

Disassociation is not necessarily permanent if an entity takes appropriate action to remedy unacceptable activity. An IRMA Board decision to consider re-associating with a participant with whom IRMA has disassociated, or to reconsider a previous decision not to associate with an applicant, will depend on the severity of the violation and level of risk that re-association/association would create for IRMA. The decision must include narrative explanation of why re-association is appropriate, and the specific terms of re-association/association, which may include measures such as:

- Improved due diligence, commitments, policies, procedures and/or management plans to prevent future violations;
- Providing remedy such as mitigation, restoration or compensation for damages or impacts;
- Collaborating with affected parties to determine what is adequate remedy;
- Independent verification of corrective/compensatory actions;
- Transparency in actions taken to mitigate or compensate for impacts;
- Other conditions deemed necessary to reduce IRMA's risks related to re-association/association.

If the disassociated entity or the previously rejected applicant is interested in re-associating with IRMA then an action plan, including timelines for providing remedy and meeting other conditions related to re-association, may at the Board's discretion be developed by the Board (or its designee, e.g., IRMA Secretariat) and agreed by the affected entity.

### 1.3.3 Probation/Conditional Association

Probation occurs when an entity already associated with IRMA (i.e., a participant) has contravened the IRMA Policy on Association, and a decision is made by the IRMA Board to impose a set of time-bound conditions that must be met to prevent disassociation. Conditional Association is similar, except it applies to applicants who have not yet entered the IRMA system.

Probation/conditional association may be considered when there is the potential, through continued association, to achieve greater positive change than is likely through disassociation/no association, and the Board considers the risk of doing so acceptable for IRMA. Additionally, factors such as whether it is a first-time violation, the number of unacceptable activities involved, the severity and cause of the violation(s), the length of time the violation(s) occurred, the degree of adverse impact, the effort to remedy the violations, and other factors may be considered prior to a decision being made regarding probation/conditional association.

An IRMA Board decision to place participant on probation or an applicant on conditional association must identify the actions upon which its decision was predicated, a narrative explanation of why probation/conditional association is appropriate, and the specific terms, which may include:

- The actions the entity must take and/or specific results necessary for the entity to exit probation and (re)gain its full association with IRMA, which may include improved due diligence, commitments, policies, procedures and/or management plans to prevent future violations, and mitigation, restoration or compensation for damages or impacts that have occurred;
- The duration of the probation/conditional association period during which actions must be taken and/or results achieved;
- Mechanism(s) for monitoring and verifying that actions and conditions are met within the specified time period
- Limitations, if any, on the entity's use of its IRMA status during probation/conditional association;
- Other conditions and terms that the Board deems necessary and appropriate; and
- The circumstances that shall indicate that the required conditions have been met and the probationary period is ended and, alternatively, the circumstances that shall indicate that the entity has not met the probationary conditions and that the probationary period and relationship has ended.
- A written confirmation from the applicant that it is committed to fulfilling the conditions necessary for an end to the probationary status and/or for reassociation.

## 1.4 Appeals Process

The IRMA Board's decision is subject to one appeal to the Board by the entity that was ruled upon or the entity that filed the complaint. That request must be within thirty days of the Board's final written decision, must be in writing, and must include grounds for reconsideration and all information that the entity wants to proffer to support its request.

The Board's original decision is final and may not be appealed by any entity if no timely request for reconsideration is filed.

## 1.5 Implementation

### 1.5.1 Disassociation

Implementation of an IRMA Board decision to disassociate from a mine, mining company, IRMA member, contractor, Certification Body, or other entities engaged in IRMA (e.g., those using the self-assessment tool, those on the Responsible Mining Map) shall occur within 30 days of the decision and shall include termination of all contractual relationships with IRMA and removal of any references to the disassociated party in IRMA materials and website.

Disassociation with a mining company shall also result in removal of IRMA achievement any of their IRMA- certified (or other achievement level) mine sites, and removal of ongoing claims of achievement for their participating mines.

Except where prohibited by law or by operation of applicable contract, disassociation shall result in forfeiture of all funds paid to IRMA up to the point of the Board's disassociation determination.

The Board in its sole discretion may identify a timeline and conditions for the entity to apply for re-association with IRMA

### 1.5.2 Probation/Conditional Association

Implementation of a Board decision to place an entity on probation/conditional association shall occur within 30-days of the decision. Timelines within the Board's decision shall commence and be calculated according to the decision.

If an entity on probation/conditional association fails to successfully complete the conditions of its probation according to the required timelines then IRMA's Board shall determine whether to disassociate from the company under probation or terminate the conditional association.

## 2. Public Dissemination of Policy on Association Determinations

The IRMA Board's decisions on all Policy on Association matters shall be made available to the public on the IRMA's website once those actions become final. This shall include, but not be limited to Board actions to:

- Disassociate
- Re-associate/reconsider decision to not form an association
- Establish a probationary period/conditional association
- Take no action (based on a determination that activities did not violate the Policy on Association)

Information made public shall include the Board's narrative explanation of why action was taken or not taken, and the terms of any actions taken.

# Appendix 1.

## Sample Self-Declaration Form for Individuals

### **Individual Self Declaration Related to the Initiative for Responsible Mining Assurance Policy on Association**

An individual is associated with the Initiative for Responsible Mining Assurance (IRMA) either by being a member of IRMA or by having a contractual relationship with IRMA.

By signing below, an individual agrees that he/she has read and understands [IRMA's Policy on Association](#), and in particular, that IRMA retains the right to refuse to associate with an individual, or to disassociate with an individual with whom it has an existing association, if that individual is directly or indirectly involved in the following unacceptable activities:

- Serious and unremediated violation of any of the eleven fundamental International Labour Organization conventions.<sup>13</sup>
- Serious and unremediated violation of human rights.<sup>14</sup>
- Serious and unremediated harm to the environment.
- Serious breaches of ethical business practices, including illegal activities and/or corrupt practices.
- False claims related to the IRMA system.<sup>15</sup>
- Intentional use of false information to do harm to others engaged in IRMA's system and processes.

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City, Date

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Name & Signature

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<sup>13</sup> A list of the fundamental ILO conventions is available at: <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>.

<sup>14</sup> Human rights as defined by Universal Declaration of Human Rights of the United Nations. (<http://www.un.org/en/universal-declaration-human-rights/>). Companies' human rights responsibilities are set out in the United Nations Guiding Principles on Business and Human Rights, [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

<sup>15</sup> For example, self-assessing mines cannot claim that IRMA or an independent third party has verified that they have reached an IRMA achievement level; independently audited mines cannot claim that they have reached an achievement level above what was verified by auditors; purchasers cannot claim to source IRMA materials if these materials have not undergone a third-party independent audit and/or transactions have not been verified as per IRMA's Chain of Custody Standard (which will become effective in 2021); and IRMA members cannot claim that IRMA membership means that they are responsible actors in the mining or mineral products sector.

# Appendix 2.

## Sample Self-Declaration Form for Organizational Entity

### **Organizational Self Declaration Related to the Initiative for Responsible Mining Assurance Policy on Association**

An organizational entity (e.g., companies, associations, governmental and non-governmental organizations) is associated with the Initiative for Responsible Mining Assurance (IRMA) either by being a member of IRMA or by having a contractual relationship with IRMA.

By signing below, an organizational entity agrees that it has read and understands [IRMA's Policy on Association](#), and in particular, that IRMA retains the right to refuse to associate with an organizational entity or to disassociate with an organization with whom it has an existing association, if that organizational entity is directly or indirectly involved in the following unacceptable activities:

- Serious and unremediated violation of any of the eleven fundamental International Labour Organization conventions.<sup>16</sup>
- Serious and unremediated violation of human rights.<sup>17</sup>
- Serious and unremediated harm to the environment.
- Serious breaches of ethical business practices, including illegal activities and/or corrupt practices.
- False claims related to the IRMA system.<sup>18</sup>
- Intentional use of false information to do harm to others engaged in IRMA's system and processes.

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City, Date

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Name & Signature

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<sup>16</sup> A list of the fundamental ILO conventions is available at: <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>.

<sup>17</sup> Human rights as defined by Universal Declaration of Human Rights of the United Nations. (<http://www.un.org/en/universal-declaration-human-rights/>). Companies' human rights responsibilities are set out in the United Nations Guiding Principles on Business and Human Rights, [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

<sup>18</sup> For example, self-assessing mines cannot claim that IRMA or an independent third party has verified that they have reached an IRMA achievement level; independently audited mines cannot claim that they have reached an achievement level above what was verified by auditors; purchasers cannot claim to source IRMA materials if these materials have not undergone a third-party independent audit and/or transactions have not been verified as per IRMA's Chain of Custody Standard (which will become effective in 2021); and IRMA members cannot claim that IRMA membership means that they are responsible actors in the mining or mineral products sector.