



Initiative for Responsible
Mining Assurance

EXCERPT FROM THE **IRMA Standard**

for

Responsible Exploration, Extraction,
and Processing of Minerals

→ **2nd DRAFT** ←

for public consultation

**CHAPTER 2.3 – Gender Equity,
and Sexual and Gender-Based Violence**

IRMA Standard v2.0 DRAFT 2

July 2025

English Version

Disclaimer and Context on this Draft

The 2nd DRAFT Version of the IRMA Standard for Responsible Exploration, Extraction, and Processing of Minerals V2.0 (hereafter referred to as the “2nd DRAFT”) is being released for public consultation, inviting the world to join once again in a conversation around expectations that drive value for greater environmental and social responsibility in mining and mineral processing.

The 2nd DRAFT does not represent content that has yet been formally endorsed by IRMA’s equally-governed multi-stakeholder Board of Directors. IRMA’s Board leaders seek the wisdom and guidance of all readers to inform this through an inclusive revision process one more time, to improve the Standard.

This draft document builds on the 1st DRAFT Version published in October 2023, and invites a global conversation to improve and update the 2018 IRMA Standard for Responsible Mining V1.0. This 2nd DRAFT is intended to provide as final of a look-and-feel as possible, although input from this consultation will result in final edits, and consolidation to reduce overall number of requirements (more on this on page 6), for a version that will be presented to IRMA’s equally-governed multi-stakeholder Board of Directors for adoption and implementation.

This 2nd DRAFT has been prepared and updated by the IRMA Secretariat based on:

- learnings from the implementation of the current IRMA Standard (V1.0)
- experience from the [first mines independently audited](#) (as of July 2025, 24 sites have completed audits or are in the process of being audited)
- evolving expectations for best practices in mining to reduce harm
- comments and recommendations received from stakeholders and Indigenous rights-holders
- the input of subject-specific Expert Working Groups convened by IRMA between 2022 and 2024
- all comments and contributions received during the public-comment period of the 1st DRAFT version (October 2023-March 2024)

Please note that 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 exploration, extraction, and processing of minerals happens.

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.

This current 2nd DRAFT is based on content already in practice in the IRMA Standard for Responsible Mining V1.0 (2018) for mines in production, and its accompanying normative Guidance document and Supplementary Guidance, combined with the content drafted in the IRMA Standard for Responsible Mineral Development and Exploration (‘IRMA-Ready’ Standard – Draft v1.0 December 2021) and in the IRMA Standard for Responsible Minerals Processing (Draft v1.0 June 2021), and offers an updated version of the 1st DRAFT Version of the IRMA Standard V2.0 that received over 2,500 unique points of comments between 2023 and 2024.

Please note: The IRMA Standard V2.0 is new in its approach in that it now covers more phases of the mining and mineral supply chain, from exploration and development, through mining, closure, and mineral processing. IRMA also, separately, oversees a [Chain of Custody Standard](#) for tracking materials through the supply chain from mine-to-market end use products.

Disclaimer on Language and Corrections

For this public consultation, only an English version is available. A Glossary of Terms used in this Standard is provided at the end of the full version of the document (see below). 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.

This document provides only one chapter excerpt from the IRMA Standard v2.0 DRAFT 2.

The full version contains 27 Chapters, [click here](#) to view it.

Objectives of this 2nd public consultation

Following the release of a 1st DRAFT of the IRMA Standard V2.0 in October 2023 for a 90-day public consultation, the IRMA Secretariat received more than 2,500 points of comments from 82 organizations, then organized additional engagement with stakeholders and Indigenous rights-holders, and solicited complementary guidance from multiple topic-specific Expert Working Groups.

We [anticipated](#) release of this 2nd DRAFT for a second round of public consultation as early as Q3 2024, then subsequently [announced](#) that more time was needed to support engagement of diverse stakeholders; the revised release date was July 2025. We provided more detailed explanation for the extended process [here](#) and [here](#).

IRMA Mining Standard: a journey



The release of this 2nd DRAFT marks a significant milestone on the road to the revision of the IRMA Standard: this public consultation will be the last of this revision cycle on V2.0.

Informed by the outcomes of this public consultation, along with guidance from Expert Advisors and IRMA Working Groups (see more below), and additional engagement with Indigenous rights-holders and stakeholders as requested, the IRMA Secretariat will prepare a final version. This final version will be discussed by the IRMA Board and refined to reach consensus for adoption by all six governing houses of IRMA: Affected Communities including Indigenous Rightsholders; Environmental and Social NGOs; Organized Labor; Finance and Investment Professionals; Mining Companies; Purchasers of Mined Materials.

In IRMA's strategic decision-making, Board members work to achieve consensus. IRMA believes a majority vote is not a model of equal governance. Instead, any motion that results in both of the two representatives from the same governing house voting "no" must go back to the full group for further discussion. In other words, a proposed course of action cannot proceed if both representatives from one of our six governing houses are opposed. Board members will keep talking until a resolution that works for all groups is found. It is a model that has worked for IRMA for nearly two decades and is fundamental to IRMA's credibility, accountability and service to all six houses of governance.

What is IRMA seeking guidance on?

Comments, feedback, and suggestions are welcome on any aspect of this 2nd DRAFT version (including intent and text of the requirements, endnotes, annexes, format and structure, design, readability, etc.).

IRMA is particularly interested in hearing the views of rights-holders and stakeholders on **the provisions in the Standard that are substantially new compared to the IRMA Standard for Responsible Mining V1.0**. These provisions (requirements or at a sub-requirement level) are highlighted in yellow throughout this Draft, to ensure they are easily identifiable.

We ask readers to assist us in weighing these potential new provisions, and also hold awareness that, prior to adoption of the final version, many of these will be consolidated and reduced in overall number.

Although these new requirements have each been drafted in response to lessons learned, the current state of best practices, emerging expectations, and/or in response to requests and suggestions made during the previous public consultation, collectively they represent substantive increased expectations for both implementing entities and audit firms. The IRMA Board of Directors seeks to ensure that the IRMA Standard, while recognized the world's most rigorous and comprehensive mining standard, continue to welcome and support uptake of newcomer companies engaging from the mineral supply chain around the world.

Thus, in this consultation, we seek guidance from all on **the new provisions that seem most urgent** to be integrated in the final version of the Standard V2.0, so that the revised Standard's expectations are paced at a realistic level to support engagement of mineral operations of a range of sizes, materials and global contexts.

It is important to note that all new requirements and sub-requirements, including those not retained in the final V2.0, will serve as the basis for the ongoing review process once the V2.0 is approved and released by our Board, and will provide fodder for future revisions, when it is decided that a V2.1 or V3.0 is needed.



Chapter 2.3

Gender Equity, and Sexual and Gender-Based Violence**SECOND DRAFT (JULY 2025): SUMMARY OF CHANGES**

- Changed title to “Gender Equity, and Sexual- and Gender-Based Violence” (SGBV) to reflect focus on equity and prevention of SGBV.
- Though the term “gender equality” was generally approved, it was pointed out as a more ambitious and aspirational desired outcome, which can be achieved through processes that promote and aim for gender equity. ‘Gender equity’ recognizes that women, girls, and LGBTIQ+ persons, are not in the same ‘starting position’ as most men (in spite of other intersectional factors). Gender equity is more about process, with the desired goal of achieving gender equality.
- The term “gender protections” was also pointed out as potentially confusing or limiting, since the intent is to really protect women, girls, and LGBTIQ+ persons from sexual- and gender-based discrimination, violence, and harm.
- Moved Chapter under Principle 2–Planning for Positive Legacies as chapter integrates a dimension around promotion of gender equity and empowerment that go beyond ‘business integrity’.
- Strengthened and clarified language around positive impacts, promotion of gender equity and empowerment of women, girls, and LGBTIQ+ persons.
- Added multiple occurrences of “to the extent legally possible” to address operational contexts in jurisdictions that criminalize some or all LGBTIQ+ persons, and/or restrict the rights of women, girls, and LGBTIQ+ persons.
- Split the policy requirement to separate the commitment to have zero-tolerance for all forms of sexual- and gender-based violence from the commitment to advance gender equity and gender mainstreaming to increase auditability and comparability.
- Added a new section for Baseline Data collection, as this was retrospectively expected within the management plan, but not laid out upfront.
- Expanded public reporting requirement to add disclosure of the performance criteria and indicators used to evaluate progress and effectiveness.
- Added in endnotes a reference to the new South African legislation which requires mines to develop and submit a GBVF [Gender-Based Violence and Femicide] report every year together with a progress report on the prevention measures implemented the previous year.
- Substantial structural changes to add clarity and consistency with the rest of the Standard.

RESPONSE TO CONSULTATION QUESTIONS OUTLINED IN FIRST DRAFT

Question #	Question	Feedback and Proposed Decision
1.X-01	<p>(Definitions: Gender, Gender Diverse, Gender Equality, Gender Mainstreaming, Gender Protections, Intersectional, Vulnerable Groups)</p> <p>Question: Below are proposed definitions of key terms in this chapter. Do you have any comments or suggestions on these definitions and/or suggestions for references to other definitions we should review and/or incorporate?</p>	<p>Feedback received: 8 responses received (4 mining, 2 NGO, 1 government, 1 audit firm). Many amendments and changes proposed.</p> <p>Proposed Decision: Definitions have been revised and updated based on stakeholder input.</p> <p>Major changes include:</p> <ul style="list-style-type: none"> - Proposing to refer to “women, girls, and <u>LGBTIQ+ persons</u>” instead of “gender-diverse individuals” (which can be perceived as limited to trans-gender persons). - Proposing to add the following terms to the glossary: ‘Gender Equity’, ‘Gender Identity’, and ‘Intersectional’. - Proposing to remove examples from definitions, as some of this material overlaps with content in the Background to the Chapter (and that is a more appropriate location for it). Additional context can be provided in Guidance.
1.X-02	<p>(Definitions: Vulnerable Groups)</p> <p>Question: References to women and gender-diverse individuals as potentially “vulnerable” or as “vulnerable groups” may sound disempowering and/or otherwise not aligned with the objectives of this chapter to advance gender equality. Are there other widely recognized terms or phrases we could use that recognize the potential susceptibility of women and gender-diverse individuals to adverse impacts such as health impacts or lack of economic opportunities due to social biases or cultural norms?</p>	<p>Feedback received: 13 responses received (6 mining, 3 NGO, 2 Finance, 1 consultant, 1 audit firm). Many versions and alternatives proposed. Respondents overall in favor of not referring to women and girls as “vulnerable”.</p> <p>Proposed Decision: We propose to drop the term “vulnerable” altogether and use instead “underserved” (as in “potentially <u>underserved and/or marginalized people</u>”). This proposition is informed by responses to this terminology question across multiple chapters.</p>
1.X-03	<p>(1.X.2.2, factors to be incorporated in gender impact and opportunities assessments)</p> <p>Question: Do you have any comments on the set of minimum factors listed above and/or can you provide examples of common factors used in gender assessments (with reference to original source)?</p>	<p>Feedback received: 9 responses received (4 mining, 3 NGO, 1 finance, 1 consultant). Comments are generally supportive of the factors proposed. A few respondents highlight again the challenges faced by companies in jurisdictions that criminalize some or all LGBTIQ+ persons. Some mining respondents flagged the complexity of such impact assessment.</p> <p>Proposed Decision: We propose to expand the list based on stakeholder comments. This list will appear in as Table 2.3-A, and will form the basis of the risks</p>

		and impacts that need to be considered during scoping (Section 2.3.3).
1.X-04	<p>(1.X.2.2, factors to be incorporated in gender impact and opportunities assessments)</p> <p>Question: In some circumstances a person may prefer not to disclose their gender, e.g., when filing a grievance—including a grievance related to gender. Allowing a worker or community member to choose not to disclose this information can have the positive impact of protecting a stakeholder or stakeholder group in some cases and may also make assessing and addressing impacts and opportunities by gender more challenging. Should we include a requirement that allows a preference not to disclose one's gender? Why or why not? In what contexts might a preference not to disclose one's gender be necessary? In what contexts might this not be appropriate?</p>	<p>Feedback received: 11 responses received (7 mining, 3 NGO, 1 consultant). The vast majority of respondents support the option to not disclose gender. Some respondents point out the differences between grievance and hiring processes for example.</p> <p>Proposed Decision: IRMA to state in the guidance that the option for <u>workers</u> or community members to not disclose gender is to be clearly articulated by the Entity, even though this may impede the ENTITY's ability to fully assess and properly remediate some <u>grievances</u> and claims. More details on how the <u>grievance</u> mechanism/s should be designed and implemented to respect fundamental rights and safety are provided in Chapter 1.6.</p> <p>IRMA to also state in guidance that information collection should adhere to applicable country of operation's laws, per Chapter 1.1.</p>
1.X-05	<p>(1.X.2.2, factors to be incorporated in gender impact and opportunities assessments)</p> <p>Question: We note that in some circumstances a person may prefer not to disclose sexual orientation, marital status, or other factors. Should we include a requirement to allow a preference not to disclose particular intersectional factor(s)? If so, what factors and why? In what contexts might a preference not to disclose the factor(s) you've identified be necessary? Are there any contexts in which a preference not to disclose the factor(s) may not be appropriate?</p>	<p>Feedback received: 10 responses received (7 mining, 2 NGO, 1 consultant). All the respondents support the option to not disclose certain personal information.</p> <p>Proposed Decision: IRMA to state in the guidance that the option for <u>workers</u> or community members to not disclose certain personal information is to be clearly articulated by the Entity, even though this may impede the ENTITY's ability to fully assess intersectional discrimination and subsequent risks and opportunities.</p> <p>IRMA to also state in guidance that information collection should adhere to applicable country of operation's laws, per Chapter 1.1.</p>
1.X-06	<p>(1.X.2.2, factors to be incorporated in gender impact and opportunities assessments)</p> <p>Question: This chapter aims to take an intersectional approach, promoting assessment of impacts by gender and understanding and addressing related factors of discrimination such as ethnicity, socioeconomic status, disability, age, geographic location, gender identity, sexual orientation, religion, or marital status, for example. Are there specific factors you recommend for intersectional assessments?</p>	<p>Feedback received: 10 responses received (5 mining, 3 NGO, 1 government, 1 consultant). Multiple factors suggested across sectors.</p> <p>Proposed Decision: We propose to expand the list based on stakeholder comments. This list will appear in as Table 2.3-B, and will be used in the scoping of potential risks and impacts (Section 2.2.3) and intersectional assessment (Section 2.2.4).</p>

1.X-07	<p>(1.X.5, Reporting)</p> <p>Question: Is the requirement to report ‘annually’ appropriate here? Do you recommend any other specific timeframe (e.g., bi- annually) and/or circumstance (e.g., major modifications to the mining or mineral processing operation, significant changes in technology, etc.) that should prompt a public report?</p>	<p>Feedback received: 12 responses received (7 mining, 3 NGO, 1 finance, 1 consultant). 7 respondents (across sectors) are supportive of annual public information-sharing. 2 mining suggest only once every two years, 1 NGO and 1 mining suggest twice a year (though the mining respondent flags important budget considerations). 1 mining suggests to report information only when there is <u>significant change</u>. 1 mining did not have an opinion at this stage.</p> <p>Proposed Decision: We propose to keep annual public information-sharing.</p>
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BACKGROUND

Women, girls, and LGBTIQ+ persons are currently under-represented in the mining and mineral processing workforce in jobs where they could access experience, training, and skills development and earn income to improve their lives and autonomy. There is vast untapped potential for leadership and employment of women, girls, and LGBTIQ+ persons in these sectors that, if realized, could advance progress toward the United Nations Sustainable Development Goals (SDGs) and targets on gender equality while also contributing to company performance.¹

Gender norms and discrimination must be addressed in recruitment processes, local procurement strategies, and workplace policies. Entities should also seek to understand traditional beliefs, gender norms, and power dynamics of communities surrounding exploration, mining and processing sites to ensure operations do not potentially exacerbate gender inequalities or increase risks of sexual- and gender-based violence (SGBV) and discrimination, as well as to be aware of how these norms may limit opportunities and benefits for women, girls, and LGBTIQ+ persons.

Women, girls, and LGBTIQ+ persons in communities affected by mining or mineral processing are at an increased risk of social and economic marginalization, domestic and sexual- or gender-based violence (SGBV), and exclusion from community engagement and decision-making. In some countries, women, girls and LGBTIQ+ persons are excluded or discouraged from stakeholder meetings and participation in decision-making out of respect for, or because of, the community's customs and norms.² Women, girls, and LGBTIQ+ persons are also more likely to report a lack of trust in grievance mechanisms often resulting from a lack of gender-balanced management, lack of timely resolutions, or lack of anonymity. In the context of access to mineral resources, resettlement has the potential to disproportionately impact women who may lack formal property rights and are responsible for reproductive work such as unpaid care work and providing food and water for their families.

Intersectionality is a critical framework for understanding and addressing gender inequity, and SGBV. Formulated in the late 1980s, this approach emphasizes that individuals experience overlapping social identities—such as ethnicity, class, sexual orientation, and disability—that shape their experiences of discrimination and privilege. Recognizing these intersections is vital for developing effective strategies to combat SGBV. Indeed, gender inequity cannot be examined in isolation; it is influenced by various systemic factors that disproportionately affect marginalized groups. For instance, women of historically-discriminated or under-recognized ethnic groups or religions (actual or perceived), women that are poor or from lower socio-economic backgrounds, Indigenous women and girls, Afro-descendants, LGBTIQ+ persons, non-married persons, women and girls with disabilities, often face compounded vulnerabilities, and experience higher rates of violence and discrimination. An intersectional approach highlights these disparities, ensuring that solutions are inclusive and reflective of diverse experiences.

Moreover, policies and programs that do not account for intersectionality may inadvertently perpetuate existing inequalities. By acknowledging the complexity of individuals' identities, companies can create more tailored interventions that address the root causes of gender inequity, and SGBV.

Impact assessments and mitigation measures that focus on gender-differentiated impact and context analysis, using an intersectional lens, as well as consultation with women, girls, LGBTIQ+ persons, their representatives or organizations defending their rights, and/or gender experts, can significantly improve an ENTITY's ability to identify and address issues of gender equality in the surrounding community caused or exacerbated by mining activity. Collecting gender-disaggregated data, conducting gender analyses, and developing measures and targets to promote gender equity and empowerment of women, girls, and LGBTIQ+ persons can all help identify and address these issues.

This chapter complements the strong cross-cutting commitment to gender equity, and to respecting and protecting the rights of women, girls, and LGBTIQ+ persons, articulated throughout the IRMA Standard.

KEY REFERENCES

This chapter strongly builds on, or aligns with, the following international or multilateral frameworks, conventions, and guidance:

- United Nations Guiding Principles for Business and Human Rights, 2011
- United Nations Convention on the Elimination of all Forms of Discrimination Against Women, 1979
- UN CEDAW General recommendation No.39 (2022) on the Rights of Indigenous Women and Girls, 2022
- UN CEDAW General recommendation No. 34 (2016) on the Rights of Rural Women, 2016
- IFC Guidance for Boards of Directors on Overseeing Gender-Based Violence and Harassment Risk, 2023

GENDER AS A TRANSVERSAL THREAD THROUGHOUT THE IRMA STANDARD

Gender – including gender equity, and SGBV – is a cross-cutting dimension of this Standard. It is covered across almost all chapters of the IRMA Standard, including:

Chapter 1.2:	Community and Stakeholder Engagement
Chapter 1.3:	Human Rights Due Diligence
Chapter 1.4:	Upstream and Downstream Sustainability Due Diligence
Chapter 1.5:	Conflict-Affected and High-Risk Area Due Diligence
Chapter 1.6:	Grievance Mechanism, Whistleblowers, and Access to Remedy
Chapter 2.1:	Environmental and Social Impact Assessment and Management
Chapter 2.2:	Indigenous Peoples and Free, Prior, and Informed Consent (FPIC)
Chapter 2.4:	Obtaining Community Support and Delivering Benefits
Chapter 2.5:	Land Acquisition, Displacement, and Resettlement
Chapter 2.7:	Concurrent Reclamation, Closure, and Post-Closure
Chapter 3.1:	Fair Labor and Terms of Work (incl. equal pay for equal work, and parental leave)
Chapter 3.2:	Occupational Safety, Health and Wellbeing (inc. gender appropriate PPE and facilities)
Chapter 3.3:	Community Health and Safety
Chapter 3.4:	Security Arrangements
Chapter 3.5:	Artisanal and Small-Scale Mining
Chapter 3.6:	Cultural Heritage
Chapter 4.1:	Waste and Materials Management
Chapter 4.3:	Water Management
Chapter 4.4:	Biodiversity, Ecosystem Services, and Protected and Conserved Areas
Chapter 4.5:	Air Quality and Dust Management

Chapter 2.3, which is generally aligned with Chapter 1.3–Human Rights Due Diligence (which is based on international laws, conventions and frameworks), provides additional specific details and requirements to ensure Entities integrate gender equity and gender mainstreaming into the responsible management of their projects/operations, and use an intersectional lens to effectively understand and address gender inequity and SGBV. As with most chapters, requirements for baseline data collection, scoping, and impact assessment processes, as well as for the development, monitoring and evaluation, and continuous improvement of management and mitigation measures does not have to be demonstrated through stand-alone processes, plans, and systems; as those can be integrated into broader/overarching ones that encompass multiple issues.

OBJECTIVES OF THIS CHAPTER

To strive for gender equality, through gender equity and gender mainstreaming, and to combat sexual- and gender-based violence in the workplace and communities where mining and mineral processing takes place.

SCOPE OF APPLICATION

This chapter is applicable to all exploration, mining and mineral processing projects and operations. For each requirement, the following colors are displayed in the margin to indicate the phases for which it is required:

E1	Exploration – Stage 1
E2	Exploration – Stage 2
E3	Exploration – Stage 3
D	Project Development and Permitting
M	Operating Mine
P	Operating Mineral Processor

The categories of risks and adverse impacts that need to be considered in this Chapter are listed in Table 2.3-A below:

Table 2.3-A – Categories of differences and barriers for, and risks and adverse impacts on, women, girls, and LGBTIQ+ persons:

- Gender inequalities within the workplace, including:
 - Differences in remuneration (e.g., non-equal pay for equal work);
 - Differences in retention;
 - Differences in roles and responsibilities, including participation in senior leadership and management roles and responsibilities;
 - Differences in benefits;
 - Differences in levels of health and safety;
- Gender-specific risks for women workers and LGBTIQ+ workers including:
 - Sexual- and Gender-based Violence;
 - Sexual harassment;
 - Intimidation;
 - Health and wellbeing;
 - Safety, including when walking home or to accommodations at night;
- Gender-specific barriers to employment and career advancement including:
 - Education level
 - Training opportunities;
 - Accommodating family roles;
 - Marital status, and having children or not;
 - Cultural norms;
 - Legal status;
 - Rural women;

- Gender-specific barriers to stakeholder engagement (e.g., participation in consultations, training, capacity building) including:
 - Accommodating family roles;
 - Cultural norms and systemic discrimination;
 - Health and safety;
 - Sexual orientation;
 - Marital status;
 - Survivors of sexual- or gender-based violence;
 - Women-headed and child-headed families;
 - Rural women;
- Gender-specific differences in or barriers to equitable community development, benefit sharing opportunities, and procurement opportunities;
- Gender-specific difference or barriers to access land ownership or participation in land decision-making and inheritance of land, ~~territories~~ and resources;
- Gender-specific differences in or barriers to restoration of livelihoods and in outcomes of resettlement action plans, if relevant;
- Gender-specific risks in the communities affected by mining and mineral processing projects and operations, including:
 - Sexual- and gender-based violence;
 - Sexual harassment;
 - Intimidation;
 - Human trafficking;
 - Forced prostitution;
 - Health and wellbeing;
 - Safety, including risks associated with the site's security personnel, and public and private security forces.

The intersectional factors of discrimination and marginalization to be considered in this Chapter are listed in Table 2.3-B below:

<p>Table 2.3-B – Intersectional factors of discrimination and marginalization, where applicable (in alphabetical order):</p> <ul style="list-style-type: none">▪ Age;▪ Beliefs and Religion (actual and perceived);▪ Caste (where applicable);▪ Disability;▪ Employment status (i.e. employee vs contractor vs sub-contractor);▪ Ethnicity;▪ Gender identity (actual and perceived);▪ Geographic location, especially rural vs urban;▪ Indigenous status;▪ Marital status;▪ Migration and legal status;▪ Number of dependent children;▪ Physical appearance (e.g. weight, clothing, tattoo, piercing)▪ Race (as a multi-dimensional social construct);▪ Sexual orientation (actual and perceived);▪ Skin color;▪ Socioeconomic status and social class (actual and perceived);▪ Women-headed and child-headed families.
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CRITICAL REQUIREMENTS IN THIS CHAPTER

Throughout the Standard, critical requirements are identified using a red frame. There is one (1) **critical requirement** in this Chapter.

OPTIONAL IRMA+ REQUIREMENTS IN THIS CHAPTER

Throughout the Standard, optional IRMA+ requirements are identified using a dotted blue frame. There is no optional IRMA+ requirement in this Chapter.

In this second draft, IRMA introduces a new category of requirements: IRMA+. These requirements are aspirational and forward-looking. They reflect emerging expectations and recommendations from stakeholders, but currently go above and beyond existing and established best practice. IRMA+ requirements are entirely optional, and they will not affect the scores and achievement levels obtained by the entities choosing to be assessed against them.



ISSUES UNDER CLOSE WATCH (EYE ICON)

Entire Chapter 2.3 – Gender Equity, and Sexual and Gender-Based Violence:

This Chapter was not included in the 2018 IRMA Standard for Responsible Mining V1.0.

Although this Chapter draws on international best practice for the promotion and mainstreaming of gender equity, and the prevention of sexual and gender-based violence, it can represent a substantial scope expansion for implementing sites. Therefore, all requirements are signaled with an ‘eye icon’ to ensure that IRMA closely monitor their relevance, and their implementation as the Standard V2.0 is applied. This is also intended to ensure IRMA will review associated challenges and needed decision more quickly if necessary. Note that these requirements are not ‘optional’ (unlike IRMA+).

IRMA Requirements



2.3.1 Formalized Policy



2.3.1.1 Critical Requirement

The ENTITY has a formal policy in place that

- a. Commits to having zero-tolerance for all forms of sexual- and gender-based violence (SGBV)³;
- b. Sets clear expectations for how personnel, contractors, and other relevant parties⁴ linked to the site and its associated facilities shall have zero-tolerance for all forms of SGBV; and
- c. Is approved at the top management level of the ENTITY;
- d. Is proactively communicated to personnel, contractors, and other relevant parties⁵ linked to the site and its associated facilities;
- e. Is publicly accessible; and
- f. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the project/operation,.



2.3.1.2 The ENTITY has a formal policy in place that

- a. Commits to advancing gender equity and gender mainstreaming⁶.
- b. Sets clear expectations for how personnel, contractors, and other relevant parties⁷ linked to the site and its associated facilities shall advance gender equity and gender mainstreaming;
- c. Is approved at the top management level of the ENTITY;
- d. Is proactively communicated to personnel, contractors, and other relevant parties⁸ linked to the site and its associated facilities;
- e. Is publicly accessible; and
- f. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the project/operation,.



2.3.2 Baseline Data



2.3.2.1 To the extent legally possible, baseline data describing the prevailing external gender context of which the site and its associated facilities take place are collected or carried out by competent professionals⁹, as follows:

- a. This baseline data includes quantitative and qualitative metrics, that are relevant to the risks and impacts listed in Table 2.3-A, and the intersectional factors listed in Table 2.3-B¹⁰;
- b. The data is collected with an appropriate level of detail to be able to identify and assess the potential risks and impacts related to past and ongoing mining and mineral processing activities in the country of operation and the site's area of influence; and
- c. The data is updated whenever social, political, or environmental conditions have changed significantly, or are predicted to change significantly, but at least every five years.



2.3.3 Scoping

2.3.3.1 Building on 2.3.2, a scoping process (or equivalent) is carried out and documented by competent professionals, to define the scope of the gender impact assessment, as follows:

- This process includes a review of laws, including customary and/or traditional laws, and regulations that are applicable to the site and its associated facilities, the ENTITY's contractors, and other relevant parties¹¹ that: 1) may have adverse impacts on women, girls, and LGBTIQ+ persons; and 2) are relevant to the promotion of gender equity and the prevention of all forms of SGBV;
- This process includes an intersectional analysis of norms and contexts that may have adverse impacts on women, girls, and LGBTIQ+ persons (see Tables 2.3-A and 2.3-B), and those that may foster or create positive opportunities to promote gender equity and empowerment of women, girls, and LGBTIQ+ persons in the workplace and in the site's area of influence; and
- To the extent legally possible, this process is informed by consultations with women, girls, and LGBTIQ+ persons, and/or their representatives (if any), and other relevant stakeholders¹².



2.3.4 Intersectional Gender Impact Assessment

2.3.4.1 Building on 2.3.2 and 2.3.3, and on the identification of stakeholders and rights-holders required in Chapters 1.2 and 1.3, competent professionals carry out an intersectional gender impact assessment (or equivalent) as follows:

- The assessment includes a comprehensive analysis of the potential risks and adverse impacts identified in 2.3.3.1, applying an intersectional lens that integrates the factors listed in Table 2.3-B, to establish a list of the actual risks and adverse impacts on people of different genders, identities and abilities in the workplace and in the site's area of influence from the ENTITY's mining-related activities and associated facilities;
- It includes an evaluation of the severity of each identified adverse impacts, and of the likelihood for and potential severity of each risk identified in 2.3.4.1.a;
- It includes an analysis of the potential differential risks and impacts on the following categories or groups of relevant stakeholders and rights-holders and a disaggregation of the results by such categories or groups: 1) People of different genders, ages, ethnicities, and Indigenous status (if relevant); 2) Rights Defenders; and 3) Persons with disabilities, and any potentially underserved and/or marginalized people;
- It is informed by relevant internal and/or external gender expertise, and incorporates analysis of credible independent reports and sources of information;
- It uses a credible intersectional methodology and includes an explanation of the assessment methodology;
- It identifies any gender-related impacts that have already occurred in relation to the site and its associated facilities, how these impacts may be aggravated by the ENTITY's current and future mining-related activities;
- It identifies whether measures have been taken to remedy these past gender-related impacts, and the extent to which affected rights-holders and stakeholders are satisfied with those measures; and
- It includes recommended measures that can be taken by the ENTITY to prevent all identified risks and adverse impacts and, where prevention is not possible or not immediately possible, to mitigate and to remediate them¹³.



2.3.4.2 To help advance gender equity and gender mainstreaming, this assessment also includes:

- a. An analysis of the potential opportunities for enhanced awareness-raising and capacity-building on gender equity and SGBV in the workplace and in the site's area of influence;
- b. An analysis of the potential opportunities for delivering sustained positive impacts on women, girls, and LGBTQIA+ persons in the workplace and in the site's area of influence;
- c. An analysis of how change in gender dynamics could actually result in additional or exacerbated risks to and adverse impacts on women, girls, and LGBTQIA+ persons;
- d. Recommended measures that can be taken to promote gender equity and empowerment of women, girls, and LGBTQIA+ persons, while mitigating any risks and impacts linked to change in gender dynamics.



2.3.4.3 To the extent legally possible, this risk and impact assessment process is informed by consultations with affected women, girls, LGBTQIA+ persons, and other affected rights-holders and stakeholders and rights-holders, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people to ensure that:

- a. The affected people who participate have opportunities to review and provide feedback, for a period of at least 60 days, on draft key issues, findings, and recommendations that are relevant to them;
- b. They have opportunities to validate these key issues, findings and recommendations, before the ENTITY can consider the process finalized or completed¹⁴; and
- c. Draft and final versions of relevant documents and information are shared with stakeholders and rights-holders, in a meaningful, accessible, and culturally appropriate way (as per Section 1.2.3), clearly showing how their feedback and input was taken into account.



2.3.5 Management Plan

- 2.3.5.1** Building on 2.3.4 and other relevant sources of information¹⁵, a gender management plan (or equivalent) is developed and documented by competent professionals to prevent, mitigate, and remediate gender-related risks and impacts identified, and (to the extent legally possible) to promote gender equity and empowerment of women, girls, and LGBTIQ+ persons in the workplace and in the site's area of influence, to the extent legally possible, as follows:
- The plan outlines specific measures to prevent and, where prevention is not possible or not immediately possible, to mitigate all potential gender-related risks and actual gender-related impacts. Where it is necessary to prioritize measures to address actual and potential adverse impacts, it first seeks to prevent and mitigate those that are most severe or where delayed response would make them irremediable¹⁶;
 - It outlines specific measures to promote, to the extent legally possible, gender equity and empowerment of women, girls, and LGBTIQ+ persons, in the workplace and in the site's area of influence;
 - It includes qualitative and quantitative gender-disaggregated performance indicators (and other categories of disaggregated indicators where appropriate)¹⁷, linked to the baseline data collected as per 2.3.2, to enable monitoring and evaluation of the effectiveness of measures over time;
 - It assigns implementation of measures to responsible staff with adequate skills and expertise;
 - It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping¹⁸;
 - It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for affected rights-holders and stakeholders;
 - It maintains estimates of human resources and budget required; and
 - It includes a financing plan in place, to ensure that funding is available for the effective implementation of the plan.
- 2.3.5.2** Affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, have access to a grievance mechanism to raise, and seek resolution or remedy for, complaints and grievances specifically related to gender-related risks and impacts, as follows:
- A grievance mechanism through which affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, can raise, and seek resolution or remedy for, complaints and grievances specifically related to gender-related risks and impacts (see categories listed in Table 2.3-A) is in place¹⁹;
 - This grievance mechanism is rights-compatible²⁰;
 - Affected rights-holders and stakeholders have been informed about the existence and functioning of this grievance mechanism, as well as of other relevant mechanisms²¹;
 - If the operational-level grievance mechanism developed as per Chapter 1.6 (Complaints and Grievance Mechanism and Access to Remedy) is used as the mechanism to receive complaints and grievance specifically related to human rights, the Entity fully meets all requirements in Chapter 1.6; and
 - If a separate mechanism is created to handle only complaints and grievances related to human rights, it is established and managed in a manner that fully meets all requirements in Chapter 1.6.



2.3.6 Monitoring and Evaluation

2.3.6.1 To monitor and evaluate the effectiveness and appropriateness of its gender management plan, at least annually, the ENTITY:

- a. Tracks and documents its performance, over successive time periods, against the gender-disaggregated indicators defined in 2.3.5.1 (and other categories of disaggregated indicators where appropriate);
- b. Tracks and documents how the measures developed and implemented as per 2.3.5 are effectively preventing gender-related impacts, and where prevention is not possible or not immediately possible, providing timely and adequate remediation to affected people; and
- c. Tracks and documents how the measures developed and implemented as per 2.3.5 are effectively promoting gender equity and empowerment of women, girls, and LGBTIQ+ persons, at the workplace and in the project/operation's area of influence.

2.3.6.2 The monitoring and evaluation process:

- a. To the extent legally possible, encourages and facilitates joint tracking or joint fact-finding with affected people, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and/or marginalized people, as per Chapter 1.2²²;
- b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected people; and
- c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of people²³.



2.3.7 Continuous Improvement

2.3.7.1 At least annually, but without undue delay after a significant change, the ENTITY:

- a. Reviews the monitoring and evaluation results, informed by internal and external feedback, as per Section 2.3.6;
- b. Reviews any gender-related grievances and the functioning of the relevant grievance mechanism/s required in 2.3.5.2 (see also Section 1.6.4);
- c. Reviews its effectiveness in preventing and remediating actual gender-related impacts as per 2.3.5, informed by the monitoring and evaluation required in 2.3.6.1 and 2.3.6.2;
- d. Develops and implements time-bound corrective measures to update, if necessary²⁴, the scoping in accordance with Section 2.3.3;
- e. Develops and implements time-bound corrective measures to update, if necessary²⁵, the risk and impact assessment in accordance with Section 2.3.4;
- f. Develops and implements time-bound corrective measures to update, if necessary²⁶, its gender management plan in accordance with Section 2.3.5, and
- g. Develops and implements time-bound corrective measures to update, if necessary²⁷, its monitoring and evaluation processes in accordance with Section 2.3.6.



2.3.8 Information-Sharing and Public Reporting

2.3.8.1 At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:

- A list of the gender-related risks and impacts identified as per 2.3.4, and details on the intersectional methodology used;
- The qualitative and quantitative gender-disaggregated performance indicators (and other categories of disaggregated indicators where appropriate) used to monitor and evaluate the effectiveness and appropriateness of its gender management plan (defined in 2.3.5.1); and
- A summary of the measures developed and implemented as per 2.3.5, and the extent to which they effectively prevented gender-related impacts, and where prevention was not possible or immediately possible, provided timely and adequate remediation to affected people (informed by the monitoring and evaluation required in 2.3.6 and the review process required in 2.3.7.1)²⁸.

CROSS REFERENCES TO OTHER CHAPTERS

This table will be added when the new content for all chapters is finalized and approved.

CHAPTER ENDNOTES

¹ P. A. Argenti et. al., The Secret Behind Successful Corporate Transformations, Harvard Business Review (2021), <https://hbr.org/2021/09/the-secret-behind-successful-corporate-transformations>. This study identifies six common attributes of company transformations, with three of these attributes related to diversity and inclusivity, including the number of women employees and managers, finding that companies with more gender diversity are more flexible and adaptable to change.

Likewise, a 2015 McKinsey report on 366 companies found that those in the top quartile for gender diversity are 15% more likely to have financial returns above the industry mean. While the study does not attribute direct causation, the presumed drivers for the higher returns in companies with more gender diversity come from attracting the best talent, having a strong customer orientation, improved decision making, and increased employee satisfaction. D. Hunt, et. al, Why Diversity Matters, McKinsey & Co. (2015) <https://www.mckinsey.com/capabilities/people-and-organizational-performance/our-insights/why-diversity-matters>

² Eftimi, A., Heller, K. & Strongman, J. (2009) Gender Dimensions of the Extractive Industries: Mining for Equity. Extractive Industries and Development Series No. 8 (World Bank). <https://openknowledge.worldbank.org/handle/10986/18236>

³ IRMA recognizes that for some entities, a policy commitment may be made at the corporate level. In these cases, entities do not need to have developed their own policies, but they will be expected to demonstrate that they are operating in compliance with their corporate owner's policy (e.g., site-level management understand the policy, and have integrated it into the site-level procedures and dealings with business partners, contractors, etc.).

⁴ This may include, as relevant, trade unions, employer organizations, joint venture partners' staff and contractors responsible for operation/management, organizations or public agencies visiting the site.

⁵ This may include, as relevant, trade unions, employer organizations, joint venture partners' staff and contractors responsible for operation/management, organizations or public agencies visiting the site.

⁶ IRMA recognizes that for some entities, a policy commitment may be made at the corporate level. In these cases, entities do not need to have developed their own policies, but they will be expected to demonstrate that they are operating in compliance with their corporate owner's policy (e.g., site-level management understand the policy, and have integrated it into the site-level procedures and dealings with business partners, contractors, etc.).

⁷ This may include, as relevant, trade unions, employer organizations, joint venture partners' staff and contractors responsible for operation/management, organizations or public agencies visiting the site.

⁸ This may include, as relevant, trade unions, employer organizations, joint venture partners' staff and contractors responsible for operation/management, organizations or public agencies visiting the site.

⁹ Collating information which may be sensitive, such as on gender-based violence, may require specific gender-sensitive methodologies and approaches to research engagement.

¹⁰ Some of this data may have been collected as part of the social baseline established in Chapter 2.1.

¹¹ This may include, as relevant, trade unions, employer organizations,

¹² Collating information which may be sensitive, such as on gender-based violence, may require specific gender-sensitive methodologies and approaches to research engagement.

¹³ Where it is necessary to prioritize actions to address actual and potential adverse human rights impacts, the ENTITY should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable. (UN Guiding Principles)

¹⁴ If evidence demonstrates that some or all stakeholders and rights-holders did/do not provide feedback and/or validation despite being provided with adequate and meaningful time, and with information-sharing taking place in accordance with Section 1.2.3, the ENTITY may “fully meet” this requirement.

¹⁵ Other sources of information may include data from monitoring and evaluation, discussions with or grievances filed by stakeholders or workers, internal reviews of particular issues that relate to gender-related issues, risks and impacts, etc.

¹⁶ Once the most severe and most likely adverse impacts are addressed within a reasonable time, the ENTITY will address less severe and less likely adverse impacts.

¹⁷ Other disaggregation may be by age, ethnicity, disability, vulnerability status, proximity to the operation, etc.

¹⁸ If work is carried out by third party contractors, then there needs to be a staff employee responsible for overseeing the quality of work, timelines, etc.

¹⁹ The operational-level grievance mechanism developed as per IRMA Chapter 1.6 (Complaints and Grievance Mechanism and Access to Remedy) may be used as the mechanism to receive all types of complaints, including those related to human rights, or a separate mechanism may be created to handle only human rights complaints and grievances. If a separate mechanism is developed, it shall be done in a manner that is consistent with Chapter 1.6. Also, there may be other mechanisms that are not operated by the company through which stakeholders or rights-holders can seek recourse (e.g., administrative, judicial and non-judicial remedies), and these options should be mentioned to stakeholders who file human rights related grievances with the company. ‘Rights-compatible’ means ensuring that outcomes and remedies accord with internationally-recognized human rights.

²⁰ ‘Rights-compatible’ means ensuring that outcomes and remedies accord with internationally-recognized human rights.

²¹ There may be other mechanisms that are not operated by the ENTITY through which stakeholders or rights-holders can seek recourse (e.g., administrative, judicial and non-judicial remedies), and these options should be mentioned to stakeholders who file grievances with the company.

²² This is especially relevant for contexts where your business and (potentially) affected rights-holders are in dispute about a particular (potential) adverse impact, and rights-holders are unlikely to accept the business’ own tracking of the effectiveness of its response to it.

²³ Especially of rights-holders at heightened risk of criminalization, vulnerability and marginalization, including LGBTIQ+ persons, or any other sensitive data.

²⁴ This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

²⁵ This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

²⁶ This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

²⁷ This will be informed by the monitoring and evaluation process required in the previous Section, and on the review process required in a. to c.

²⁸ Note that, effective 1st November 2024, South Africa legally requires all mines to “develop and submit a GBVF [Gender-Based Violence and Femicide] implementation plan” every year with a “progress report of the previous year”. Source: Mine Health and Safety Act, 1996 (Act No. 29 of 1996) Guidance Note for the Management of GBVF, Safety and Security Challenges for Women in the South African Mining Industry (2 August 2024) https://www.gov.za/sites/default/files/gcis_document/202408/51003gon5098.pdf

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