GLOBAL WORKPLACE RESPONSIBLE SOURCING, ENVIRONMENTAL, HEALTH AND SAFETY DUE DILIGENCE STANDARD FOR SMALL TO MEDIUM SEMI-MECHANISED MINES

Responsible Mica Initiative

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Standard Contents

Introduction

Background

The Responsible Mica Initiative (RMI) is a global coalition for action that aims to establish a fair, responsible, and sustainable mica supply chain. As part of its mandate, RMI encourages the responsible sourcing of mica and does set the norm for mica sourcing globally.

To incentivize and improve supply chain on-site practices and due diligence in the mica value chain at the upstream end of the supply chain, RMI has co-developed a standard addressing ESG and due diligence at various level of the upstream mica supply chain:

- **2021**: in collaboration with RBA (Responsible Business Alliance's Responsible Minerals Initiative) decided in 2021, to issue the 'Global Workplace Responsible Sourcing, Environmental, Health & Safety, Due Diligence Standard for Mica Processors to address ESG and due diligence concerns at mica processing sites where mica sorting takes place.
- **2025**: RMI, in collaboration with the Alliance for Responsible Mining (ARM) launched the MICA CRAFT Code to address ESG concerns at the mica extraction level within artisanal and small-scale mining (ASM) mica producers.

In addition to ASM mica extraction and based on its on the ground expertise, RMI has identified the existence of semi-mechanised mica operations in various mica extracting countries, including in India, one of its programmatic countries. These operations, while still relying heavily on manual labour, use basic machinery for extraction and light processing and differ from ASM producers and processing sites.

Given the above, and the absence of a fit for purpose and scope specific global mining standard that could be effectively applied to small to medium mechanised mica mines, RMI decided to design a purpose-built standard to address ESG and due diligence concerns that could be effectively applied to these types of mica extracting operations.

The "Global Workplace Responsible Sourcing, Environmental, health and safety due diligence standard for small to medium semi-mechanised mica mines" sets forth the criteria for determining conformance with RMI program requirements which include environmental, social, health & safety, governance, and supply chain due diligence.

Mica mining operations are expected to use good faith and reasonable efforts in their due diligence and are expected to adapt the nature and extent of their environmental, OHS, social, governance and due diligence systems to their individual circumstances. The criteria in this document are used by an audit firm and their individual auditors to assess whether a mica mine operation has implemented supply chain due diligence adapted to the circumstances of its mica supply chain, as well as site-level responsible workplace standards. Mica mine operations may also use the criteria in developing their systems, processes, procedures and controls. The site-level workplace criteria incorporate five components on legal, environmental, OHS, social and

governance requirements (collectively referred to as "environ- mental, social and governance" or "ESG") and responsibility. These criteria can be further specified or adapted, depending on the geographical and legal context of the assessed mica mining operation.

Facilities within scope

Companies with facilities that meet the below definition of a small to medium mica semi-mechanized mining operations are eligible to use the criteria set in the "Global Workplace Responsible Sourcing, Environmental, health and safety due diligence standard for small to medium semi-mechanised mica mines". Where a mica mining operation has more than one extraction process, only those mica-related processes are included within the scope of the assessment. Processing operations located outside of the physical scope of the mine, even where owned by the same company as the mica mine, are not in scope for this standard/assessment. However, and as long as they are conducted on the same site and fall under the same lease, processes related to mica extraction such as initial sorting post extraction or grinding of mica flakes to a coarse or semi-finished product are in scope for the purpose of this assessment. All mica mine operation activities, processes and systems used to implement supply chain due diligence and manage operations regarding mica, including the management system, operations/implementation, and disclosure of information are in scope for the assessment. Where a mica mine makes claims that receipts or operations are not covered by the assessment or out-of-scope for any step of due diligence, those claims must be verified by the auditor.

Defining small to medium mica semi-mechanized mica mining operation

Small to medium semi-mechanized mica mining operations are generally established formal businesses that extract mica from pegmatite deposits—which also contain quartz and feldspar—using a combination of machinery and manual labor, though with less reliance on manual work compared to artisanal and small-scale mining (ASM) producers. The contextual analysis below provides background information to define the characteristics of operations covered under this scope.

1. **Spatial characteristics, Facilities and Infrastructure**
- Operations range from small to medium enterprises extracting mica from surface or shallow underground deposits.
- Production volumes are typically between 10,000 – 100,000t per year.
- Methods include blasting, use of hand tools; tools such as compressors, jackhammers, or small excavators.
- Transport: Basic infrastructure such as paved/unpaved access roads, manual or tractor-based transport.
- Processing: Basic sorting and grading of Quartz, Feldspar and mica flakes on site or at nearby collection centers.

2. **Labour and Working Conditions**
- A mix of family labour, local daily wage workers, and seasonal migrants.
- Employment is often informal and may lack formal contracts, particularly in small-sized sites.
- Child labour may be present in sorting activities in small sites.

- Women often engaged in low-paid sorting or carrying tasks.
- Wages are typically low, often below statutory minimum wage.
- Long working hours without regulated shifts;
- Occupational Health and Safety: Limited PPE; exposure to dust, heat, and unstable pits; minimal first-aid facilities and training.

3. **Management Systems and Governance structure**
- Early-stage management systems with limited environmental and social risk/impact management structures.
- Small mines often run by local landowners with registered mining lease or unregistered mining lease whereas medium-sized operations are more likely to have registered mining leases.
- Community relations are typically informal; social license to operate is often based on kinship or economic dependence.

This standard recognizes that small and medium-sized mica mining operations vary significantly across several key dimensions: mine size, extraction and trading volumes, workforce size, governance structures, management organization, and equipment complexity. To accommodate these differences, the compliance requirements will be proportionally adjusted for smaller operations. The specific thresholds and criteria that define small and medium operations—along with their corresponding compliance expectations—will be detailed in the audit framework grid and guidance materials provided to auditors.

Material within scope

All natural mica minerals physically extracted at an in-scope mica operation during the assessment period are included. Materials inventory that have been physically extracted prior to the current audit period must be disclosed. Synthetic mica and mica-containing products are not included in the scope of this standard.

Limitations

These criteria cover certain ESG matters that companies may be faced with as part of their operations and responsible sourcing practices. However, these criteria are not exhaustive. A successful assessment must not be used to imply operating performance beyond the strict scope of these Criteria, does not result in a material certification, nor does it determine that minerals, materials or products are "conflict-free" or are free from ESG risks such as human rights abuses. Assessment of information disclosure among supply chain actors, to auditors, other stakeholders and the public will take into account the protection of business confidentiality and other competitive concerns. This includes price information and supplier relationships.

Criteria Overview

The environmental, social and governance (ESG) criteria (Sections 1 to 4) reflect legal requirements and operating standards for mica mining operations. These criteria relate to operating conditions and procedures of the mica mining operation's own facility, equipment, systems and employees including those related to health & safety.

Despite its scope of application at the upstream end of the mica supply chain, the supply chain due diligence criteria of this standard remain highlight relevant as mica mining operations remain responsible for conducting due diligence on any external mica suppliers they may source from. As outlined in Section 5, the standard follows four (Step 1,2,3 and 5) out of the five step framework for risk-based due diligence from the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict- Affected and High Risk Areas, Edition 3 (OECD Guidance) and its Annex II risks.

1.0   Environmental

1.1   Legal Compliance

The site

1.1.1   Identified all applicable environmental permitting and regulatory requirements at the local, national, regional and state levels.

1.1.2   Established processes to comply with applicable laws, including the monitoring of existing and emerging applicable laws, and key legal risks for the mine site and maintaining a register of significant legal obligations, to be updated at defined intervals.

1.1.3   Obtained all applicable environmental permits and authorizations.

1.1.4   Ensures all operations and facilities are situated within the legal boundaries of the licences/permits.

1.1.5   Maintained documentation concerning any legal enforcement actions/lawsuits involving the mine site and corrective actions/resolution of such actions.

1.1.6   Where this standard conflicts or is not consistent with permitting and regulatory requirements at the local, national, regional and state levels, the mine site complies with the regulatory/legal requirements as a minimum.

1.2   Environmental Management

The site

1.2.1   Has a system for identifying and managing environmental issues and impacts at the operating site and ensuring personnel with environmental management responsibilities have/maintain relevant training and education related to their duties.

1.2.2   Collected baseline data that characterise the environmental, social, cultural and economic context of the proposed new project, expansion or other significant changes to existing operations, against which risks, impacts, mitigation measures, and benefits can be assessed.

1.2.3 Conducted an environmental, social, cultural and economic impact assessment (ESIA) of the proposed new project, expansion or other significant change to an existing operation consistent with jurisdictional regulations. (This should include, where relevant, air, soil, land, water, biodiversity and ecosystem services, climate, emissions, noise and vibration, health, safety, gender, human rights, Indigenous Peoples, resettlement, cultural heritage, in-migration, social and economic impacts of mine closure.)

1.3 Technical Environmental Data and Supporting Information

The site

1.3.1 Must use credible qualified technical environmental data.

1.4 Air Emissions (other than GHG)

The site

1.4.1 Developed an air quality management plan that:

1.4.1.a determines permitting and emissions controls requirements

1.4.1.b documents an inventory of the emission sources and types that may include but not be limited to:

- Particulate matter (OM);
- Sulphur oxides (Sox);
- Nitrogen oxides (Nox);
- Volatile organic compounds (VOCs).

1.4.1.c outlines the mitigation measures to avoid, where that is not possible, minimise adverse impacts on human health and the environment (including impacts to land, soil, water and vegetation).

1.5 Greenhouse Gas (GHG) Emissions

The site has

1.5.1 A greenhouse gas emissions management plan (in a manner that aligns with the goals of the Paris Agreement, country-specific targets, and a site-based energy reduction target.)

1.5.2 Undertook high-level analysis to identify physical impacts and risks to operations from climate change and related adaptation measures.

1.5.3 Quantified and documented a CO_2 emissions baseline for at least Scope 1 and 2 (Scope 3 optional).

1.5.4 Established GHG emission reduction targets.

1.5.5 Established an energy-use and GHG emissions management and monitoring system (determining which Scope GHG emissions it includes in its program.) that includes mechanisms to identify and quantify Scope 1 and 2 GHG emissions (1 – direct

emissions 2 – emissions from purchased energy), including significant sources of non-energy GHG emissions.)

1.6 Noise

The site

1.6.1 Identified potential sources of noise and vibration and implemented a monitoring programme informed by permit requirements and the presence and location of sensitive receptors (people, flora and fauna).

1.6.2 Established baseline data on different types of noise and vibration from a defined reference date.

1.6.3 Has means in place to ensure noise standards are not exceeded as appliable to the appropriate area classification/type.

1.7 Energy Consumption

The site

1.7.1 Measured energy consumption and established a baseline.

1.7.2 Identified, implemented and quantified energy efficiency improvements.

1.7.3 Investigated opportunities for low emission energy sources and incorporated low-emission energy supply in the energy mix.

1.7.4 Increased the use of renewable energy to reduce total energy consumption and/or energy intensity, where possible.

1.8 Freshwater Management and Conservation

The site

1.8.1 Has an environmental management plan that includes responsible management of water resources.

1.8.2 Assigned responsibility and accountabilities for water management to senior management.

1.8.3 Obtained freshwater use or withdrawal authorization where necessary.

1.8.4 Conducted and documented an assessment of water use impacts

1.8.5 Conducts research and collaborates with relevant stakeholders to identify water-related concerns, challenges, and opportunities that exist at the local and regional levels.

1.8.6 Implemented a water use monitoring programme informed by permit requirements and the presence and location of sensitive receptors (people, flora and fauna).

1.9 Wastewater Discharges

The site

1.9.1 Developed a documented inventory of waste-water sources and types, including wastewater from worker-provided accommodation.

1.9.2 Determined permitting, authorizations and wastewater discharge controls/treatment requirements.

1.9.3 Installed, operates and maintains wastewater discharge control/treatment equipment.

1.9.4 Identified and assessed environmental risks from potential waste-water discharge failures.

1.9.5 Identified all mining-related activities and facilities that may pose a risk to water quality, including sedimentation risks, from planned discharges or unplanned releases of contaminants of potential concern (COPCs) are, including but not limited to:

1.9.5.a. Mine waste facilities (e.g., tailings impoundments, waste rock dumps, slag heaps, heap and dump leach piles, open pits, pit lakes, underground workings, etc.), including catastrophic releases from facility failures;

1.9.5.b. Other types of waste facilities (e.g., hazardous wastes, solid waste landfills, sewage treatment plants);

1.9.5.c. Mineral beneficiation and processing facilities and activities (e.g., crushing/grinding, flotation, heap or vat leaching, mineral processing);

1.9.5.d. General mining activities (e.g., blasting, transport of chemicals and materials, etc.).

1.9.6 All non-mining-related facilities, such as worker-provided accommodation, that may pose a risk to water quality are identified.

1.10 Soil Erosion Management

The site

1.10.1 Periodically evaluates erosion for its operations, especially when evaluating new construction or soil-disturbing work.

1.10.2 Implements soil erosion controls where needed based on the site assessment and inspections.

1.10.3 Developed and implements an adaptive management plan for land and soil (or equivalent) that:

1.10.3.a. Outlines mitigation and other measures to be implemented concurrent with operations to prevent and minimize adverse impacts and/or remediate and restore land and soil as follows:

i. Measures include topsoil salvage to the maximum extent practicable, and topsoil storage in a manner that preserves its capability to support ecological restoration;

ii. Mitigation measures are specific, measurable, linked to clearly defined outcomes, relevant, and time-bound;

iii. Key indicators are identified and linked to adequate baseline data, to enable measurement of the effectiveness of mitigation measures over time;

ïv. Actions, or oversight of implementation, are assigned to responsible staff;

1.10.3.b. outlines known measures to be taken during and final reclamation and closure to remediate and restore land and soil.

1.11   Waste Management and Circularity

The site

1.11.1   Has a waste management plan adopting the waste mitigation hierarchy (i.e. prevent, reuse/minimise, recycle, energy recovery, dispose), and in line with national law and applicable International Conventions (such as the Basel, Rotterdam and Stockholm Conventions).

1.11.2   Obtained waste management authorization or registrations where necessary.

1.11.3   Identified waste streams, including mineral waste, hazardous and non-hazardous waste, and whether opportunities exist to avoid and reduce the amount of waste generated, and reuse or recycle residual waste.

1.11.4   Implements a waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (mineral, non-mineral, hazardous, non-hazardous and inert), across operational activities.

1.11.5   Developed and documented an inventory of waste sources, types and current disposal/ treatment locations and methods, including a baseline against which it measures reductions.

1.11.6   Separates waste types during on-site accumulation.

1.11.7   Stores wastes in containers that are in good condition, compatible with the wastes stored and labeled in the appropriate language(s) for the work force.

1.11.8   Used authorized waste management vendors for waste transportation, treatment and disposal.

1.11.9   Maintains documentation of all off-site waste management activities.

1.11.10   Developed a documented waste reduction plan in relation to the baseline.

1.11.11   Assesses the hazards and risks of all hazardous materials entering the Facility.

1.12   Biodiversity, Forests and Protected Areas

The site

1.12.1   Does not use, operate or encroach on legally protected areas such as protected forests, wildlife reserves areas of cultural or historical significance with national protection status.

1.12.2   Maintains a buffer area between its operations and any protected areas/land to which it may be adjacent.

1.12.3   Maintains a buffer area between its operations and any indigenous peoples' lands for settlements.

1.12.4   Implements biodiversity restoration activities on abandoned sites.

1.12.5   Established senior management responsibility and accountability for biodiversity management.

1.12.6   Established a biodiversity baseline in the area of influence and identify significant biodiversity values as early as practicable to support the initial 'avoidance' stage of the mitigation hierarchy.

1.12.7   Assessed risks and impacts to biodiversity in the area of influence from the activities relating to the operations.

1.13   Chemical/Fuel Storage Tanks/Containers

The site

1.13.1   Has an updated inventory of all aboveground and underground storage tanks on site, including the operational status, chemicals stored and indication of spill prevention mechanisms.

1.13.2   Trains relevant workers, contractors and emergency response providers on spill procedures including:

1.13.2.a. Procedures, methods and materials used for containment, clean-up, decontamination, and remediation;

1.13.2.b. Instructions for evacuations, if relevant;

1.13.2.c. Appropriate personal protective equipment and clothing for workers or contractors engaged in spill response;

1.13.2.d. Any relevant fire-fighting measures, including:

   i. Appropriate extinguishing equipment, and information about equipment that is not appropriate for a particular situation; and

   ii. Special protective equipment or precautions related to hazardous combustion products;

1.13.3   Has labeled or marked tanks and containers with the contents, hazards and operational status (if out of service, empty or unused), and other relevant information related to the contents include safety data information for workers.

1.13.4   Has procedures and/or engineering controls to prevent the overfill of tanks.

1.13.5   Has procedures and/or engineering controls to capture and minimize the spread of any spills including from loading/unloading areas.

1.13.6   Conducts routine formal and informal inspections of all tanks, associated piping, valves and flanges and alarms.

1.13.7   Permanently disconnects from and removes the service tanks that are no longer needed or intended to be used.

1.13.8   Ensures that tanks that are temporarily out of service are blind-flanged or disconnected from service piping.

1.14   Land and Soil Management

The site

1.14.1 Carries out a scoping exercise to identify potential and actual impacts that the project may have and/or any actual impacts that the operation has had on land or soil (including waste rock management, soil quality, the physical stability of soil or land), and current and potential future land uses).

The scoping process includes consideration of the following potential sources of impacts, as relevant:

1.14.1.a. Construction of mine facilities (e.g., open pits, ore heap and dump leach and waste storage facilities) and mineral processing facilities, land clearing, earthmoving, mine roads and other excavation and soil-disturbing activities;

1.14.1.b. Emergencies and major accidents, including catastrophic failure of facilities.

1.15 Management of Physical Stability

The site

1.15.1 Carries out a risk assessment to evaluate the risks to human rights and the health and safety of communities and the environment from all credible failure modes identified. The risk assessment

1.15.1.a. is carried out and documented by a multi-disciplinary team using a credible methodology;

1.15.1.b. identifies credible failure modes for which design elements and critical controls must be prioritized, and a rationale is documented; and

1.15.1.c. is updated every three years or sooner (e.g., if there proposed changes in the design or operation of facilities, or changes in operational, social, environmental, or local context that have the potential to increase the probability or severity of consequences of any identified risk).

1.16 Tailings Management

(Applicable for mine sites with beneficiation activities)

1.16.1 Have developed a tailings management plan in line with regulatory requirements.

1.16.2 Conducts annual internal reviews of the status of tailings facilities.

1.16.3 Identifies opportunities to minimise the production of tailings.

1.17 Mine Closure and Rehabilitation

The site

1.17.1 Develops a closure plan in line with regulatory requirements.

2.0 Occupational Health and Safety

2.1 Legal Compliance

The site

2.1.1   Identified all applicable OHS requirements at the local, national, regional and state levels.

2.1.2   Monitors existing and emerging applicable laws, and key legal risks for the mine site and maintains a register of significant legal obligations, to be updated at defined intervals.

2.1.3   Establish processes to comply with applicable laws.

2.1.4   Obtained all applicable OHS permits and authorizations.

2.1.5   Maintained OHS documentation demonstrating compliance.

2.1.6   Maintained documentation concerning legal enforcement actions.

2.1.7   Complied with legal requirements where conflicts exist.

2.2   Occupational Health and Safety Management

The site

2.2.1   Has a health and safety policy or plan (or equivalent) in place and implemented at the project/operation that:

2.2.1.a. includes commitments to prioritize the health and safety of workers and to continuing improvement in health and safety performance over time, with the objective of achieving zero harm in the workplace;

2.2.1.b. is approved at the most senior level of the operation;

2.2.1.c. is communicated or accessible to all employees, and relevant contractors.

2.2.2   Has a documented system for identifying, managing and reducing OHS hazards at the operating site.

2.2.3   Established accountabilities for safe, healthy, and respectful workplaces.

2.2.4   Has a properly-qualified nurse or doctor covering all operating shifts where required by law, and access to basic first-aid at no cost.

2.2.5   Has employee rest areas where required by law.

2.2.6   Conducts formal, periodic occupational health and safety risk assessments to identify and then address current and potential health and safety hazards.

2.2.7   Provides workers with free on-site access to appropriate personal protective equipment (PPE), clean and safe water, sanitation and hygiene facilities that are gender-appropriate.

2.2.8   Requires contractors to provide free on-site access to appropriate personal protective equipment (PPE) to workers.

2.2.9   Has a process to ensure personnel with OHS management responsibilities have/maintain relevant training and education related to their duties.

2.2.10   Established mechanisms or pathways for workers to report health and safety-related queries, concerns, issues and/or incidents.

2.3   Hazard Identification

The site

2.3.1   Has identified and documented all OHS hazards to employees, contractors and visitors. Hazards may include:

- Chemical
- Biological,
- Physical,
- Electrical,
- Fire,
- Environmental (temperature, lighting, ventilation).

2.3.1.a. The hazard identification includes groups of people that may be particularly susceptible to a hazard (e.g., pregnant women, breastfeeding mothers, people of different ages, genders, health status, physical characteristics, ethnicities, etc.) are specifically accounted for and address, such as:

- Physical hazards
- Chemical hazards (exposure to solvents),
- Biological hazards,
- Psychological hazards.

2.3.1.b. Hazard identification and risk assessments are reviewed and updated at least annually.

2.4   Technical OHS Data

The site

2.4.1   Uses credible qualified technical occupational health and safety data.

2.5   Personal Protective Equipment (PPE)

The site ensures

2.5.1   Based on the job safety assessments and hazard identification, it makes appropriate PPE available to employees, contractors and visitors at no cost.

2.5.2   Personal protective equipment and clothing is:

2.5.2.a. fit for purpose, and the size and fit are gender-appropriate and provide adequate protection; and

2.5.2.b. maintained by the entity in clean and good working condition, and replaced as necessary.

2.5.3   Based on the job safety assessments and hazard identification, ensures inventories of PPE are adequate.

2.5.4   Based on the job safety assessments and hazard identification, trains employees, contractors and visitors on proper use and fit of PPE as appropriate to their function in the workplace.

2.5.5   Based on the job safety assessments and hazard identification, monitors proper use of PPE by employees, contractors and visitors.

2.5.6   Every shift has supervision at a level commensurate with the risks and the competence of workers. Supervision includes:

2.5.6.a. Oversight and enforcement of adherence to relevant procedures and controls related to the tasks being carried out; and

2.5.6.b. Consistent and correct usage of personal protective equipment and clothing appropriate to the working environment.

2.6   Emergency Response/Egress

The site

2.6.1   Adopted a site emergency and crisis response plan.

2.6.2   Established a site emergency and crisis response team with defined roles and responsibilities.

2.6.3   Communicated the site emergency and crisis response plan with all employees and provided relevant trainings.

2.6.4   Identified potential emergency scenarios and their potential to escalate into a crisis. These could include but are not limited to operational disruptions and failures, natural hazards, conflict and civil disturbance, and public health crises.

2.6.5   Has a documented evaluation of the site/operations for emergency response needs, including conduct an emergency response capability assessment of both internal and external resources, on a defined interval and based on identified scenarios, to address any identified gaps, including resources and equipment.

2.6.6   Developed Emergency and Crisis Preparedness and Response Plan(s) that address identified scenarios to avoid and minimise loss of life, injuries and impacts on the health and safety of workers, communities, the environment and property.

2.6.7   Trained employees, contractors and visitors on emergency response requirements, including conducting drills.

2.7   Fire Safety

The site has

2.7.1   Established and maintains a fire safety committee.

2.7.2   Conducted and documented a fire safety evaluation.

2.7.3   Implemented an inspection, testing and maintenance program for fire safety equipment.

2.7.4   Repaired or replaced fire safety equipment in a timely manner.

2.7.5   Correctly installed all fire safety equipment, including fire extinguishers, hose reels etc.

2.7.6   Ensured that firefighting equipment is unlocked and access is not blocked.

2.7.7 Trained employees, contractors and visitors on fire safety as appropriate to their function in the workplace.

2.8 Electrical Safety

The site

2.8.1 demonstrates that documented procedures or measures are in place and implemented to address occupational health and safety hazards associated with the electricity.

2.9 Equipment Safety

The site

2.9.1 Has developed, documented and implemented an energy control (lock-out/tag-out) program.

2.9.2 Ensures that energy control program includes proper lock-out/tag-out tools, equipment, locks and tags in the appropriate language(s) for the work force

2.9.3 Ensures that energy control program includes training for employee, contractor and visitor.

2.9.4 Has displayed machine guarding equipment and signage in the appropriate language(s) for the work force.

2.9.5 Has conducted documented inspections and monitoring of lock-out/tag-out activities and machine guarding condition and effectiveness.

2.10 Vehicle/Powered Equipment Safety

The site

2.10.1 Ensures that the vehicle powered equipment safety program includes documented pre-use inspections.

2.10.2 Ensures that the vehicle powered equipment safety program includes a requirement to use seat belt for all powered vehicles/equipment used on-site.

2.10.3 Ensures that the vehicle powered equipment safety program includes a prohibition to use cellphones while operating vehicles/powered equipment.

2.10.4 Ensures that the vehicle powered equipment safety program includes the presence of warning systems in powered equipment/vehicles.

2.10.5 Ensures that the vehicle powered equipment safety program includes a requirement that only employees and contractors specifically trained in a particular vehicle/powered equipment use/operation can operate vehicles/powered equipment.

2.11 Hand Tool Safety

The site

2.11.1 Maintains hand tools in good condition (handles stable, no damage or cracks, etc.).

2.11.2   Conducts on-going documented inspections and monitoring of hand tool condition.

2.12   Confined Space Safety

The site

2.12.1   Has PPE available appropriate for confined space entry and rescue.

2.12.2   Has adequate ventilation for confined spaces and underground working.

2.13   Hot Work

The site

2.13.1   Has developed a documented hot work management program including properly identifying hot work activities, separation of hot work areas and conducting fire watches.

2.14   Structural Safety

The site

2.14.1   Has documented an evaluation of its structural safety.

2.14.2   Has implemented a program for documented on-going inspections of conditions or events that may impact structural integrity or safety of the site.

2.15   Walking/Working Surfaces

The site

2.15.1   Maintains walkways and work areas free of slip and trip hazards and obstacles.

2.15.2   Maintains work areas free of hazards that create slip and trip hazards or other risk of injuries.

2.15.3   Removes damaged equipment from service until repairs are complete or replacements are placed into service.

2.16   Chemical Safety

The site

2.16.1   Maintains an updated inventory of chemicals used in all buildings and areas of the operation, including a baseline against which it measures reductions.

2.16.2   Has kept available chemical safety information in the language(s) of the workers.

2.16.3   Ensures that employee training are appropriate to their function in the workplace.

2.16.4   Has identified and separated the incompatible chemicals in the language(s) of the workers.

2.16.5   Has labelled container in the appropriate language(s) for the work force.

2.17   Working at Heights

The site

2.17.1   Has implemented a documented program for working safely at heights that includes employee, contractor and visitor training as appropriate to their function in the workplace.

2.17.2   Ensures that equipment used for working at heights is suitable, stable and appropriate for the job.

2.17.3   Conducts regular documented inspections of fall protection/prevention equipment for damage, correct use and expiration.

2.17.4   Ensures to provide protection from falling objects.

2.17.5   Ensures to prevent the storage of hazardous materials on rooftops.

2.18   First Aid

The site

2.18.1   Complies with national legal regulations that define medical facilities to be available on site for the treatment of work injuries or in their absence ensures at least:

- Basic first aid capabilities, equipment and supplies, at no cost

- Trained people who can administer basic first aid, at no cost

- Unrestricted access to first aid and rapid response equipment, at no cost,

- Procedure to enable transfer to a medical facility, if necessary. has basic first aid capabilities, equipment and supplies.

2.19   Explosives

The site

2.19.1   Demonstrates that documented procedures and measures are in place and implemented to address occupational health and safety hazards associated with the use of explosives.

3.0   Social

3.1   Legal Compliance

The site

3.1.1   Has identified the legal compliance requirements related to labor, worker and social matters/impacts, and operates in accordance with those requirements, such as identified all applicable worker registration requirements at the national, regional, state and local levels.

3.1.2   Has obtained all applicable authorizations with regards to legal compliance requirements related to labor, worker and social matters/impacts.

3.1.3 Has maintained documentation to demonstrate on-going compliance with all applicable authorizations and regulatory requirements.

3.1.4 Maintains documentation (e.g. policies, procedures, records) that includes payment of wages, payment of displacement and journey allowances (where applicable), provision of facilities, as defined by the law (accommodation, medical facilities, etc.), to demonstrate compliance with all applicable laws.

Notes: For sites employing migrant workers, this requirement extends to compliance with the applicable law.

3.2   Stakeholder Engagement

The site

3.2.1 Carried out stakeholder mapping, implemented an engagement plan and takes measures to address identified issues.

3.2.1.a. identified and mapped the stakeholders and rights-holders, and their legitimate representatives, that are directly and indirectly affected, potentially affected by, or that have an interest in the site's activities.

3.2.1.b. engaged potentially impacted stakeholders and rights-holders on processes and decisions that affect their health, well-being, safety, livelihoods, communities, lands, environment and other rights and interests.

3.2.1.c. communicated meaningful information and provide materials to stakeholders and rights-holders in a timely manner and in ways that are accessible, understandable and culturally appropriate.

3.2.1.d. Periodic consultations with stakeholders to identify and understand potential barriers to participation in engagement processes that exist for different genders, ages, ethnicities, and any potentially vulnerable group.

3.3   Child Labour

The site

3.3.1 Has a documented policy banning the use of child labor, including the Worst Forms of Child Labor.

3.3.2 Has established, documented, maintained and effectively communicated to personnel and other interested parties, written policies and procedures for remediation of child laborers, and provides adequate financial and other support to enable such children to attend and remain in school.

3.3.3 Has implemented the more stringent of either

3.3.3.a. national, subnational or local legal requirements for child and juvenile/adolescent labor, or

3.3.3.b. a management system that prevents the employment of children under the age of 15, prevents the worst forms of child labor, and prevents the exposure of employees under the age of 18 to hazardous work in line with ILO Conventions No.

138 and No. 182.

3.3.4   Identified and evaluated risks of child labour.

3.3.4.a. Based on identified risks, implemented practices to minimise and mitigate the risk of child labour in the Facility's operations, including by implementing an age verification mechanism for workers.

3.3.4.b. If workers between the ages of 15 and 18 are employed by the Facility, adopt appropriate measures based on identified risks to protect their health, safety, morals and wellbeing.

3.3.4.c. If instances of harm to the rights of a child or modern slavery are found within the onsite or offsite operations of the Facility, act immediately to cease any immediate harm to life or safety.

3.3.5   Documents the ages of all workers.

3.3.6   Has procedures in place where young workers (aged 15 – 17) are subject to compulsory education laws, they work only outside of school hours.

3.3.7   Ensures that under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work more than 8 hours a day.

3.3.8   Ensures that young workers may not work during night hours.

3.4   Forced/Bonded Labour

The site

3.4.1   Implemented a management system that prevents the use of any forms of forced labor and participation in acts of human trafficking in line with ILO Conventions No. 29 and No. 105.

3.4.2   Has a documented policy prohibiting forced, bonded (including debt bondage) or indentured labor; involuntary or exploitative prison labor; slavery or trafficking of persons in recruiting and employment practices.

3.4.3   Ensures that workers must not be required to pay employers', agents' or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

3.4.4   Ensures that contract terms related to employment are provided in writing in the employee's native language.

3.4.5   Ensures that workers must be provided a copy of their contract prior to leaving their country of origin.

3.4.6   Ensures that no substitution or change(s) shall be allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

3.4.7   Ensures that all work is voluntary, and workers are free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.

3.4.8   Ensures government-issued identification and personal documentation originals are not held by the employer/labor agent/contractor. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents.

3.4.9   Ensures there are no unreasonable restrictions on the movement of workers and the access to basic liberties.

3.5   Entitlement to Work

The site

3.5.1   Has a policy in place committing to respect workers' rights, including to fair and decent employment terms, freedom of association and collective bargaining, protection against discrimination and harassment and unfair disciplinary practices and apply responsible recruitment practices.

3.5.2   Is committed to identify and reduce/remove barriers to the advancement and fair treatment of women in the workplace.

3.5.3   Ensures all workers have the right to work.

3.5.4   Has developed and implements policies to monitor if all workers have the right to work.

3.5.5   Keeps a record of documentation on legal right to work.

3.6   Hiring

The site

3.6.1   Ensures that all workers are provided with a written employment agreement in their native language that contains a description of terms and conditions of employment.

3.6.2   Ensures that migrant workers receive the employment agreement prior to the worker departing from his or her country or location of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

3.7   Use of Labour Providers/Agencies

The site

3.7.1   Uses only registered/authorized labor providers/agencies.

3.7.2   Has systems to monitor labor providers/agencies.

3.7.3   Ensures no fees charged to workers by the providers/agencies exceed legal limits.

3.7.4   Ensures that workers do not pay deposits to providers/agencies.

3.7.5   Ensures that workers are not charged fees for food, clothing, transportation, health checks, work documentation and / or supplies as part of their recruitment.

3.8 Subcontracting

The site

3.8.1   Has developed and implements a policy to monitor subcontractors where it is a client requirement.

3.8.2   Ensures subcontractors have the legal right to work.

3.8.3   Ensures there is no substantial evidence of forced / bonded / trafficked / prison labor at subcontractor level.

3.8.4   Ensures there is no substantial evidence of child / underage labor at subcontractor level.

3.9 Freedom of Association

The site

3.9.1   Has a documented policy concerning employees' rights to freedom of association and to collective bargaining.

3.9.2   Respects employees' rights to freedom of association and to collective bargaining in line with ILO Conventions No. 87 and No. 98, participates in collective bargaining processes in good faith and does not obstruct alternative means of association where there are legal restrictions. In the absence of formal collective bargaining, worker committees should be permitted to discuss workplace issues.

3.9.3   Ensures union members, representatives of workers and any personnel engaged in organizing workers are not subjected to discrimination, harassment, intimidation or retaliation for being union members, representative(s) of workers or engaged in organizing workers. The site shall also ensure that such representatives have access to their members in the workplace.

3.10 Harassment

The site

3.10.1   Has a documented policy concerning fair treatment of all workers, including domestic and foreign workers,

3.10.2   Has a documented policy banning harassment of workers, including for example (this list is not exhaustive):

- sexual harassment/abuse,

- corporal punishment,

- mental or physical coercion,

- verbal abuse.

3.10.3   Maintains records of worker reports of harassment, disciplinary actions, associated investigations and corrective actions.

3.10.4   Provides training to employees on harassment.

3.11 Discrimination

The site

3.11.1 Prevents and addresses all forms of discrimination in the workplace in line with ILO Conventions No. 100 and No. 111, including for example (this list is not exhaustive):

- Race, national or territorial or social origin,
- Caste, birth,
- Religion,
- Disability,
- Gender,
- Sexual orientation,
- Family responsibilities,
- Marital status,
- Union membership,
- Political opinions,
- Age, or
- Any other condition that could give rise to discrimination.

3.11.2 Maintains evidence of procedures to effectively implement the policy covering all requirements prescribed by law to prevent the discrimination of workers, including domestic and foreign migrant, and at a minimum:

- Hiring,
- Remuneration and payment of legally granted social benefits,
- Access to training,
- Working hours and overtime,
- Unionization and collective bargaining,
- Promotion,
- Disciplinary practices,
- Termination.

3.11.3 Ensures personnel are not subject to pregnancy or virginity tests under any circumstances.

3.11.4 Maintains records of worker reports of discrimination disciplinary actions, associated investigations and corrective actions.

3.11.5 Provides training to employees on discrimination.

3.12 Lay-off

The site

3.12.1 Ensures any employee who has been in a continuous service for a year should not be laid off until he has been given a month's notice in writing, indicating reasons, unless he has been paid wages for the period, in lieu of such notice.

3.12.2 Ensures that, in an ordinary lay-off, the last person to be employed in a category of worker is laid-off first. If not so, the employer records the reasons for the same.

3.12.3 Ensures that any dismissal compensation (termination pay) is provided in line with local and national laws and regulations.

3.13 Gender Equality

The site

3.13.1 Has a documented policy concerning gender equality in the workplace.

3.13.2 Continually assesses and monitors gender equality in the workplace.

3.14 Working Hours

The site

3.14.1 Has a documented policy concerning working hours, overtime and mandated leave.

3.14.2 Keeps employees' total regular and overtime working hours to 60 hours per week unless defined otherwise by applicable law or a collective bargaining agreement.

3.14.3 Ensures overtime is voluntary.

3.14.4 Ensures that, when overtime work is needed in order to meet short-term business demand, such overtime work is managed in accordance with a freely negotiated collective bargaining agreement representing a significant portion of its workforce.

3.14.5 Provides annual and mandated leave in compliance with national and local laws.

3.14.6 Maintains records of employee work hours, overtime and leave.

3.15 Remuneration/Compensation

The site

3.15.1 Has a documented policy concerning minimum wages, overtime, severance and benefits.

3.15.2 Does not engage in labor practices that reduce workers' wages or benefits or result in employment situations such as labor-only contracting arrangements, consecutive short-term contracts, use of temporary workers for more than six months and/or false apprenticeship or similar schemes that avoid a country's labor and social security requirements.

3.15.3 Pays wages that equal or exceed the national minimum wage.

3.15.4 Pays appropriate overtime/nightshift wages.

3.15.5   Pays appropriate paid leave (including maternity leave)

3.15.6   Pays appropriate social security & compensation for injuries/death

3.15.7   Pays provides other benefits such as those related to years of service, seniority, performance, etc.

3.15.8   Does not deduct or reduce wages for disciplinary purposes.

3.15.9   Pays government or regulatory deductions on time.

3.15.10   Ensures workers are not required to sign up for accommodation rental exceeding period of employment or require excessive deposits with financial penalties for leaving early employment or accommodation.

3.15.11   Maintains records of timely payment of wages, severance and benefits to workers.

3.15.12   Provides pay slips to workers in a language they understand and to include a detailed account of all deductions.

3.15.13   Ensures wages are paid only to the employee, including bank accounts controlled by the employee.

3.15.14   Ensures none of worker pay is withheld for any reason that is not allowed by law or union/collective bargaining agreement.

3.15.15   Ensures that workers are not required to pay deposits to access their documents or take vacation/leave.

3.15.16   Does not charge rents for accommodation that are in excess of local norms/market conditions.

3.16   Grievance Mechanism

The site

3.16.1   Has a grievance mechanism accessible to all employees, stakeholders and rights-holders, anonymously.

3.16.2   Communicates the availability of the grievance mechanism to all employees, stakeholders and rights-holders.

3.16.3   Assigned responsibilities and accountabilities for management of the grievance mechanism.

3.16.4   Has a "no retaliation" policy the prohibits disciplining, dismissing or otherwise discriminating against any personnel or interested party for providing information on this standard compliance or for making other workplace complaints

3.16.5   Has procedures for investigating, following up on and communicating the outcome of complaints concerning the workplace or of its implementing policies and procedures.

3.16.6   Ensures that results are freely available to all personnel and, upon request, to interested parties.

3.16.7   Has evidence of compliance with the right of workers, including domestic and foreign migrant, to lodge complaints before responsible authorities, as prescribed by the law.

3.16.8   Provides training to employees with grievance management responsibilities on the grievance mechanism

3.16.9   Provides training to employees with accountabilities and responsibilities for grievance management who engage with communities

3.17   Community Health and Safety

The site

3.17.1   Identifies potential adverse risks and impacts related to its activities that directly affects surrounding communities.

3.17.2   Implements measures to prevent or mitigate identified adverse risks and impacts, using the mitigation hierarchy.

3.17.3   Monitors avoids, minimizes adverse impacts on health and safety of the communities surrounding the site.

3.18   Community Development

The site

3.18.1   Has identified community needs in consultation with affected communities, developed a plan, and committed resources to support community development.

3.18.2   Provides local people with access to job opportunities and local enterprises with access to procurement and contracting opportunities.

3.18.3   Contributes to local community, social and economic development through a community investment programme.

3.19   Artisanal and Small-Scale Mining

The site

3.19.1   Implements a system of controls and policies to demonstrate that the site does not source minerals from external parties. If the site does buy materials from external suppliers, the site should;

3.19.2   Determine the extent to which ASM is operating within a legal framework, in and around its mining concession.

3.19.3   Assesses risks to the site operations from ASM and mitigates identified ASM risks.

3.19.4   Support the formalisation and improvement of environmental and social practices at ASM mines

3.20   Human Rights

The site

3.20.1   Has a documented policy concerning respecting human rights, consistent with the UN Guiding Principles on Business and Human Rights (UNGPs).

The policy:

3.20.1.a. Is approved at the most senior level of the entity;

3.20.1.b. stipulates the entity's human rights expectations of personnel, business partners, and other parties directly linked to the project/operation; and

3.20.1.c. is publicly available and communicated internally and externally to all personnel, business partners, and other relevant parties and stakeholders.

3.20.2   Implements the UN Guiding Principles on Business and Human Rights including human rights due diligence.

3.20.3   Integrates human rights considerations into operational policies (e.g., code of conduct, supplier contracts).

3.20.4   Establishes and implements mechanisms to receive, track and respond to human rights grievances raised by stakeholders and rights-holders.

3.20.5   Provides human rights training at defined intervals for staff who are responsible for managing human rights-related issues.

3.21   Security and Human Rights

The site

3.21.1   Has a policy concerning workplace security and its impact on worker human rights, that:

3.21.1.a. acknowledges the entity's responsibility to:

   i. Respect human rights in its efforts to maintain the safety and security of operation; and

   ii. Avoid using public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force;

3.21.1.b. stipulates the entity's expectations of contractors vis-à-vis the above commitments;

3.21.1.c. is approved at the most senior level of the entity; and

3.21.1.d. is publicly available and communicated to relevant stakeholders.

3.21.2   Implements the Voluntary Principles on Security and Human Rights (VPSHR) when engaging with private or public security forces.

3.21.3   Conducts a security risk assessment.

3.21.4   Continually assesses and monitors human rights conformance in the workplace.

3.21.5   Promptly informs the appropriate authorities of credible security-related human rights incidents or allegations, exercising discretion where appropriate, and monitor any associated investigations where possible.

3.22   Rights of Underprivileged Communities, including Indigenous Peoples' and Ethnic Minorities

The site

3.22.1 Has a documented policy concerning right and Free Prior and Informed Consent (FPIC) of under-privileged communities.

3.22.2 Communicates this commitment to Indigenous Peoples and to other stakeholders and rights-holders.

3.22.3 Respects FPIC and the rights of underprivileged communities, such as Indigenous Peoples and ethnic minorities.

3.22.4 Avoids adverse impacts on underprivileged communities' lands, livelihoods, resources and cultural heritage.

3.22.5 Engages with Indigenous Peoples to understand what is important to them

3.22.6 Demonstrate agreement of consent with affected Indigenous Peoples (where applicable)

3.22.7 Has developed and implemented an underprivileged communities engagement plan in order to contribute to their empowerment.

3.22.8 Communicates and provides access to a grievance mechanism that is informed by, and culturally appropriate for, Indigenous Peoples.

3.23 Land Acquisition and Resettlement

The site

3.23.1 Avoids involuntary physical and/or economic displacement wherever possible

3.23.2 Has a documented policy concerning land acquisition and resettlement.

Where land acquisition or resettlement is necessary, the site,

3.23.3 Explores all viable alternative project designs to avoid and/or minimize land acquisition and physical or economic displacement,

3.23.4 Develops a resettlement action plan (RAP) in consultation with affected stakeholders and rights-holders,

3.23.5 Implements the RAP to fairly address and compensate for residual adverse impacts in consultation with impacted local stakeholders.

3.23.6 Identifies and seeks resolution of existing claims and conflicts of land title in compliance with applicable international and/or national law.

3.23.7 Implements actions and remedies that avoid, minimise mitigate or compensate for adverse impacts of involuntary physical and/or economic displacement,

3.23.8 Provides compensation for lost assets and other assistance to help displaced people improve or restore their livelihoods and standard of living, in a transparent, consistent, and equitable manner.

3.24 Cultural Heritage

The site

3.24.1 has a policy committing to identifying, protecting and respecting cultural heritage.

3.24.2 Assigned accountability and responsibility for the management of cultural heritage.

3.24.3   Has identified cultural heritage that could be impacted by the site's activities in collaboration with traditional owners and users of cultural heritage and informed by:

    3.24.3.a. Government, regarding formally designated or legally protected heritage sites.

    3.24.3.b. Relevant organisations, such as cultural institutions, universities, civil society, and religious groups.

    3.24.3.c. Publicly available data from reputable sources.

3.24.4   Based on consultation with stakeholders, the site avoids, minimizes, reduces and compensates for adverse impacts on cultural heritage.

4.0   Governance

4.1   Legal Compliance

The site

4.1.1   Identified the legal compliance requirements related to operating the business, and operates in accordance with those requirements, including avoiding doing business with sanctioned entities and ensuring payment of taxes.

4.1.2   Ensures they have legal access to the land they will use (including associated facilities such as waste and storage facilities, processing plants etc.)

4.1.3   Obtained all applicable authorizations.

4.1.4   Maintains documentation to demonstrate ongoing compliance with all applicable authorizations and regulatory requirements.

4.1.5   Maintains documentation concerning any legal enforcement actions/lawsuits involving the mining operation and corrective actions/resolution of such actions.

4.1.6   Where this standard conflicts or is not consistent with permitting and regulatory requirements at the national, regional, state, and local levels, the mining operations complies with the legal requirements as a minimum.

4.2   Mine Policies and Procedures

The site

4.2.1   Developed, communicated, and enforced documented policies on the site's expectations and requirements for environmental management, occupational health and safety, social responsibility, and corporate governance.

4.2.2   Identifies material sustainability risks and opportunities for inclusion in external company disclosure.

4.2.3   Has operating procedures in place to support the policies.

4.2.4   Has a process to ensure personnel with responsibilities for policy/procedure implementation have/maintain relevant training and education related to their duties.

4.3   Business Integrity

The site

4.3.1   Prohibits and prevents bribery (including facilitation payments), corruption and anti-competitive behavior.

4.3.2   Monitors existing and emerging applicable laws, and key legal risk and maintains a register of significant legal obligations, to be updated at defined intervals.

4.3.3   Has established responsibility for business ethics management to someone in the company.

4.3.4   Has a policy that includes ethical and integrity business practices that prohibits bribery, corruption, fraud, money laundering, and anti-competitive behaviour both in the ethics and integrity policy and Code of Conduct.

The anti-bribery and corruption (ABC, or equivalent) policy:

4.3.4.a. outlines the entity's commitment to preventing, detecting and addressing corruption and bribery by the entity's employees, contractors, and third parties such as agents, intermediaries, suppliers, and joint venture partners (hereafter referred to as "business partners");

4.3.4.b. is approved at the most senior level of the entity; and

4.3.4.c. is communicated to all workers, contractors and business partners

4.3.5   Developed a Code of Conduct to communicate the ethical and integrity standards required of workers.

4.3.6   Has a system to verify Fraud and collusion identification and management systems.

4.3.7   Prohibits the giving, offering or accepting gifts, offers of employment or contracts or anything of value, whether directly or indirectly through third parties or family members.

4.3.8   Ensures that the Internal employee whistleblower mechanism and whistleblower protection in place.

4.3.9   Ensures that there is no misuse of confidential data.

4.4   Stakeholder Engagement

The site

4.4.1   Commits to meaningful and transparent engagement with local stakeholders and rights-holders and communicate this commitment locally.

4.4.2   Carries out documented stakeholder mapping to identify and map the stakeholders and rights-holders, and their legitimate representatives, that are directly and indirectly affected, potentially affected by, or that have an interest in the Facility's activities, including women, vulnerable and/or underrepresented groups.

4.4.3   Engages potentially impacted stakeholders and rights-holders on processes and decisions that affect their health, well-being, safety, livelihoods, communities, lands, environment and other rights and interests.

4.4.4   Implements an engagement plan, fostering two-way dialogue and meaningful stakeholder engagement by:

4.4.4.a. Providing stakeholders with opportunities to contribute to meeting agendas and add topics of concern to them;

4.4.4.b. Providing relevant information to stakeholders, including advance notice of proposed activities;

4.4.4.c. Engaging in a manner that is free from manipulation, interference, coercion, or intimidation;

4.4.4.d. Engaging with a broad spectrum of stakeholders representing a diversity in genders, ages, ethnicities, and members of any potentially vulnerable groups;

4.4.4.e. Regularly soliciting feedback from stakeholders on issues relevant to the stakeholders;

4.4.4.f. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; and

4.4.4.g. Engaging on an ongoing basis, throughout the project/operation life cycle.

4.4.5   Has established a grievance mechanism that is accessible to stakeholders.

4.4.6   Communicates meaningful information and provide materials to stakeholders and rights-holders in a timely manner and in ways that are accessible, understandable and culturally appropriate.

4.5   Business Relationships

The site

4.5.1   Promotes responsible business practices with significant business partners. This includes:

4.5.1.a. conducting due diligence on business partners,

4.5.1.b. assessing potential new business relationships,

4.5.1.c. periodically reviewing existing relationships to evaluate changes, and

4.5.1.d. promoting transparency.

4.5.2   Has a responsible supply chain policy, that,:

4.5.2.a. outlines the principles and standards that they entity follows to identify and manage risks in the supply chain of minerals

4.5.2.b. Is consistent with Annex II of the OECD Due Diligence Guidance;

4.5.2.c. includes a commitment by the entity to undertake due diligence on its operations and, where applicable, its supply chain in accordance with the OECD Due Diligence Guidance 5-step framework (and where applicable relevant Supplements) and sets out clear and coherent management processes for risk management;

4.5.2.d. is approved at the most senior level of the entity.

4.6 Management and Responsibility and Accountability

The site

4.6.1 Has established formal documented management responsibility and accountability for implementation of due diligence, health, safety, social, and environmental management.

4.6.2 Demonstrated management accountability and implementation through actions of monitoring and enforcing due diligence, health, safety, social, and environmental management requirements.

4.6.3 Made available training programs to workers on sites requirements, expectations, and effective implementation on due diligence, health, safety, environmental management, social responsibility, grievance mechanisms, and business ethics.

4.6.4 Implemented processes for root cause investigations for complaints, grievances, or incidents.

4.6.5 Made resources available for such investigations, corrective/preventive actions and implementation, and maintains records of the results.

4.6.6 Communicated disciplinary policies and procedures in place for staff and contractor non-conformance to legal or contract requirements.

4.6.7 Has a process of monitoring disciplinary actions taken against staff and contractors.

4.7 Transparency and Disclosure

The site

4.7.1 Reports (e.g., annual report, annual sustainability report etc.) on workplace environmental, health, safety, social, and governance performance ideally in line with internationally recognized standards (e.g., GRI, IFRS) and to publicly support the implementation of EITI, and report where practical or integrate that information into sustainability, corporate responsibility, or due diligence reports where the mining operation publishes one.

5.0 Supply Chain Due Diligence

5.1 OECD 5 Step Framework

The site

Step 1 - Management Systems

5.1.1 Has an OECD-aligned responsible mineral supply policy, that, at minimum:

5.1.1.a. Outlines the principles and standards that they entity follows to identify and manage risks in the supply chain of minerals, including risk assessments;

5.1.1.b. Is consistent with Annex II of the OECD Due Diligence Guidance;

5.1.1.c. Includes a commitment by the entity to undertake due diligence on its operations and, where applicable, its supply chain in accordance with the OECD Due Diligence Guidance 5-step framework (and where applicable relevant Supplements)

and sets out clear and coherent management processes for risk management;

      5.1.1.d.   Is approved at the most senior level of the entity; and

      5.1.1.e.   Is made publicly available.

If the site is sourcing minerals from suppliers, the site:

5.1.2   Ensures responsible employees have sufficient knowledge and experience of supply chain due diligence.

5.1.3   Allocates resources and staff for due diligence operation and monitoring.

5.1.4   Implements communication processes to ensure that critical information – including the site supply chain policy, management processes and information on risks – reaches relevant employees.

5.1.5   Has in place accountability for employees expected to perform due diligence.

Step 2 - Risk identification and assessment

5.1.6   Identifies, assesses, and prioritises the most significant parts or segments of its operations where the severity or likelihood of sustainability risks is high or very high.

5.1.7   Takes reasonable action to prevent and mitigate high or very high risks.

Step 3 - Strategy to Respond to Identified Risks

5.1.8   Conducts an internal review of effectiveness of actions to identify, prevent and mitigate risks at regular intervals.

5.1.9   Where appropriate, provides remedy where the site's prioritised business relationships have caused or contributed to adverse impacts.

Step 5 - Report Annually on Due Diligence

5.1.10   Reports annually and publicly on their supply chain due diligence with respect to implementation of the OECD Due Diligence Guidance 5-Step framework.

The report includes the following elements (as applicable):

5.1.10.a. The location of the entity's publicly available supply chain policy and a description of the management and internal control systems that have been put into place to support due diligence;

5.1.10.b. A description of the systems used for identifying red-flags, details of any actual red-flags identified and information on actual and/or potential Annex II risks; and

5.1.10.c. Information on steps taken to enhance engagement with red-flag suppliers, where applicable, and to mitigate risks.