

C Lifecycle Management

The lifespan of a mine can be decades long, and there are a number of discrete lifecycle phases in the responsible development and closure of a mine. The process begins with mineral exploration. If a potentially viable ore deposit is identified, a company may then design and investigate the technical and financial feasibility of developing a mine. If a corporate decision is made to move forward with a project (See C.02), and the appropriate regulatory approvals are received, the mine enters the development or implementation phase, which involves constructing and operating the mine. Finally, when the ore has been extracted, the mine enters a closure phase, which can last many years or even decades if there are long-term environmental issues remaining at the site.

Due diligence should be carried out throughout all lifecycle phases, to ensure that risks to the company and communities and the environment are minimised, that opportunities for efficient, sustained extraction are maximised, and that safeguards are put in place to guarantee the ongoing and post-mining social and economic health of affected communities and protection of the environment. In particular, it is critical that companies work with communities and workers to plan ahead for the transition from the construction to operations phase, and operations to closure phase, to ensure that communities and workers have viable social and economic futures throughout the mine lifecycle and when the mine closes (See C.05). When a mining company decides to suspend its operations for a given or undetermined period and place the asset under “care and maintenance”, a similar approach to just transition will ensure workers are prepared and provided with alternatives or mitigation measures (See E.06).

In some cases, a single mining company will not shepherd a mining project through its entire lifecycle. Whenever there is a transfer of mine ownership, a due diligence process is necessary to ensure that risks and liabilities are disclosed and understood, and that adequate financial security is in place to prevent and manage social and environmental impacts (See C.06).

C.01 Mine Lifecycle Management

The potential economic, environmental and social impacts and opportunities related to mining will vary over time. As is now widely recognised, sound environmental and social management requires that companies consider and address the full spectrum of issues throughout all stages of the mine lifecycle.

A lifecycle approach to mining requires that systems be put in place to identify, assess and manage environmental and socioeconomic risks, impacts and opportunities in a structured, ongoing manner, and with stakeholder engagement. EESG-related risks and challenges are often particularly acute towards the end of the mine lifecycle, when multiple pressures align (e.g. potential financial constraints

as production rates decline, tensions with local stakeholders if socio-economic development expectations remain unfulfilled, and increased complexity surrounding legacy issues). If mine closure is poorly managed, the adverse impacts of the closure itself on workers and communities can be further exacerbated.

Although mine closure is the end stage of the mine lifecycle, effective planning for closure will begin as early as the exploration phase, as simple changes early on in the design and construction of a mine can have profound implications during the mine lifecycle and post-closure. A closure plan will include concepts such as concurrent remediation of environmental impacts; strategies to prepare workers and affected communities for planned or unplanned fluctuations in jobs and income, such as the move from construction to operations, or temporary mine closures; and programmes that will enable workers and communities to emerge post-closure with viable social and economic opportunities (See also C.05). Closure plans will be regularly updated to reflect changes in mine operations and environmental and social circumstances.

When mining companies take a proactive and collaborative approach to planning, assessing, and managing for risks and opportunities during all stages of the mine lifecycle, they demonstrate to workers, communities, producing country governments, investors and other stakeholders that they are committed to responsible mining and delivering positive outcomes. This can lead to greater trust and support for the project from stakeholders, increased worker morale, reduced long-term liabilities, longer-term commercial viability of operations, lower mine closure costs, and greater access to financial resources.

Commitment

The company commits to adopt a lifecycle approach to ensure it manages EESG issues throughout the entire project lifecycle, from exploration to post-closure.

Can your company demonstrate at the corporate level that it has:

- a. Formalised its commitment, that is endorsed by senior management, to adopt a lifecycle approach to ensure it manages EESG issues throughout the entire project lifecycle, from exploration to post-closure?
- b. Assigned senior management or board-level responsibilities and accountability for carrying out this commitment?
- c. Committed financial and staffing resources to implement this commitment?

C.02 Project Approval Process

Developing a mine is a capital-intensive endeavour. As a result, mining companies carry out comprehensive evaluations to determine whether or not to invest in a project.

One proven and effective way to manage the complexity of capital projects in the mining industry is to take a stage-gate approach as a project moves through its lifecycle from concept to project approval. At each 'gate' a go/no-go decision is made based on information gathered during that stage. Information analysed may be of a technical nature (e.g., ore body characteristics) or financial (the market for the particular mineral, the cost of regulatory compliance, the availability and cost of labour). However, if done responsibly, a company will include other risk factors.

For any proposed mine a complex mix of social, political, human rights, financial, and environmental issues will influence the viability of a project. For example, a project may require lengthy negotiations to obtain the free, prior and informed consent of Indigenous Peoples (See D.09), with no certainty of a positive outcome for the company; projects may require involuntary resettlement (See D.10), which could have high costs associated with compensation for affected households and mitigation of social and human rights impacts; or environmental factors such as site geology or potential changes in precipitation from climate change may pose potentially unacceptable long-term risks or costs related to tailings management (See F.02).

Companies sometimes make capital investment decisions and operational choices that are based on a narrow definition of financial risk that assumes social, political, environmental and other factors are less critical to the success of the project. As a result, the threshold for those risks to influence a project approval decision may be disproportionately high, for example, only being considered if they are strong enough to shut down a project. A rigorous analysis of environmental, economic, social, governance and human rights risk factors increases the likelihood that responsible, informed decisions will be made at the project investment stage.

The ability to influence project success and enhance value is greatest at the start of project appraisal and rapidly declines as a project advances towards implementation. Early identification and analysis of environmental, economic, social, governance and human rights risks alert company decision-makers to potential problems, and enable the planning of pre-emptive mitigation strategies that can produce significant project-related cost savings. Alternatively, analyses may result in the avoidance of projects that present too great a risk of causing significant impacts to communities or the environment. For example, some mining companies now screen prospective investments to determine if sites are in or adjacent to World Heritage Sites or other protected areas, to ensure that they avoid operating in internationally recognized areas of outstanding natural or cultural values.

Increasingly, financial institutions and private investment firms that finance mining projects are integrating EESG factors into their lending decisions. Aside from the clear inherent benefit of leaving a more positive legacy, mining companies that can demonstrate that they have evaluated the risks and have a clear strategy for mitigating environmental risks and potential impacts on workers and communities are more likely to be attractive opportunities for investors to put their funds.

Action	<p>The company has systems in place to integrate ESG criteria into the stage-gating process in investment decision-making.</p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to:</i></p> <ol style="list-style-type: none">a. Identify ESG criteria to be met during each stage of its investment decision-making processes?b. Apply these identified ESG criteria during each stage of its investment decision-making processes?c. Ensure appropriately qualified personnel are responsible for applying these identified ESG criteria in investment decision-making process?
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C.03 Emergency Preparedness

Large-scale mines carry significant operational risks. The release or spill of hazardous chemicals, tailings dam failures, explosions, fires and a range of other possible accidents pose risks to mine workers and nearby communities. Accidents may be related to human errors, equipment failure, or poor management of mine wastes or hazardous materials (See F.02 and F.07). Natural forces, such as earthquakes, floods, cyclones or forest fires may also cause or compound emergencies at mining operations.

Mining-related accidents or incidents may lead to significant and long-lasting impacts, including environmental damage, property damage, injuries, loss of life and psychological trauma. They may also cause significant financial losses for communities, governments and companies, and damage to the image of the mining industry as a whole.

Despite best efforts, mining-related accidents and emergencies can never entirely be prevented. However, mining companies, in collaboration with local governments, workers and communities, can develop and implement crisis management and emergency preparedness policies, training programmes and procedures to minimise the negative consequences of such emergencies.

Depending on their geographical context, high-burden diseases (such as HIV, tuberculosis, malaria, and pneumonia) can impact mining-affected communities and mine workers. According to the WHO, epidemics of infectious diseases are occurring more often, and spreading faster and further than ever, in many different regions of the world. Risk assessment, planning and preparation for disease and epidemic

prevention and control are essential, and collaboration between stakeholders (especially governments and companies) is vital to optimise response and limit impacts.

Guidance has been developed to help mining companies prepare themselves, their workers and local communities for emergencies. The United Nations Environment Programme and others have recommended that companies adopt a collaborative approach to emergency response planning that involves local authorities, emergency responders and community members in the identification of potential mining-related accidents; the development of strategies to reduce and manage identified risks, as well as ensuring clean-up and recovery; and the creation of emergency response plans. And similarly to identify and address risks for workers and affected communities associated with pandemics and high-burden diseases that are relevant to the company's operations. To increase the effectiveness of emergency response plans, mining companies can test them with potentially affected parties and communicate them to the community-at-large so that key actors are prepared to respond effectively to a range of emergency scenarios.

A collaborative approach to emergency response can help to reduce community fears about potential mining-related impacts, reduce the risks to vulnerable populations that are often hit hardest and longest by disasters, pandemics, and emergencies, and build greater confidence and trust between mining operations and communities. In the event of a mining-related accident, well-planned emergency response may reduce human casualties, limit impacts on property and the environment, optimise clean-up and recovery, and minimise financial losses to the company.

Financial preparedness is an additional component of responsible emergency preparedness. The leading practice is for companies to anticipate and insure against the cost of reparation for accidents or natural catastrophes, to ensure that funds are available to implement effective emergency response, pay compensation for damages, injury or loss of life, and for companies to fund recovery and reconstruction in a timely and efficient manner.

Action	<p>The company has systems in place to ensure its operations engage local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans.</p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:</i></p> <ol style="list-style-type: none"> a. Develop and maintain emergency preparedness and response plans? b. Systematically engage with local stakeholders (e.g. local authorities and communities) in the design of emergency response plans? c. Systematically engage with local stakeholders in the testing of these response plans?
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Action	<p>The company has systems in place to ensure its operations identify, assess, avoid, and mitigate risks for workers and communities associated with pandemics and high-burden diseases that are relevant to the company's operations.</p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:</i></p> <ol style="list-style-type: none"> a. Identify and assess risks for workers and affected communities associated with pandemics and high-burden diseases that are relevant to the company's operations? b. Develop strategies and plans, in collaboration with workers, to address identified risks for workers? c. Develop strategies and plans, in collaboration with affected communities, to address identified risks for affected communities?
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Action	<p>The company publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, including insurance against tailings facility failure, throughout its operations.</p> <p><i>Can your company demonstrate that it:</i></p> <ol style="list-style-type: none"> a. Publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, including insurance against tailings facility failure? b. Includes in this disclosure information on specific financial assurance provisions on a mine-site-disaggregated basis? c. Updates this information on a yearly basis?
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C.04 Circular Materials Management

Mining operations produce huge quantities of non-mining waste material, much of which can be reduced or recovered through re-use, repair and recycling. This waste material, not produced as a direct result of mining (in contrast to mining waste such as overburden, waste rock and tailings), includes for example end-of-first-life equipment, from vehicles and conveyor belts to other machinery, as well as used inputs such as oil and chemicals, PPE, geotextiles, paper, plastic and timber products, etc.

A sound system for managing these materials encompasses the entire lifecycle of a mine and is based on the mitigation hierarchy approach, prioritising first and foremost reduced consumption, followed by re-use, repair and recycling, and only disposing of the materials when none of these options are available.

Advances in sustainable materials management technologies, infrastructure and markets mean that the recycling of nonmining waste is becoming more feasible and economically attractive. Technology-based solutions include for example enhanced monitoring of mechanical wear-and-tear and predictive maintenance that can enable more effective repairs and extend the life of equipment, and advanced processing that transforms waste oil into fuel.

Growing numbers of regulations and incentives for materials stewardship mean that re-use, repair and recycling of non-mining waste are now more commonly used by mining companies. For example, limits or bans on on-site disposal of used mining tyres are supporting increased investment in recycling and other recovery solutions.

Some mining companies are taking advantage of the economic opportunities presented by the global trend towards increased circularity, by establishing their own recycling businesses. Others have established partnerships with firms specialised in the reclamation of certain non-mining waste to service their own needs. All mining companies can take practical steps to reduce proportion of their used goods and inputs sent to final disposal (landfill or incineration) by building their capacity to re-use, repair and recycle these materials. This will enable companies to not only reduce their environmental footprint and support the circular economy, but also to extract more value out of the goods they purchase and to save on costs of disposal and replacement.

Effectiveness

The company tracks, reviews and acts to improve its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations.

Can your company demonstrate that it systematically:

- a. Tracks and discloses data, against targets and across successive time periods, on its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations?
- b. Audits and/or reviews its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations?
- c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations?

C.05 Mine Closure and Post-Closure Viability

Just as the construction and operation of a large-scale mine create radical changes to the natural and socio-economic landscapes of a region, the closure of a mine also creates the potential for significant impacts. The economic and social viability of communities that host, neighbour or send labour to mines are often intimately tied to revenues from taxes, wages or mine-related procurement, as well as any infrastructure and services provided by the mining company (See D.04).

Following the permanent or even temporary closure of a mine, the cessation of revenue streams and other mine-related benefits can have devastating and long-lasting effects on communities such as: outmigration; crumbling infrastructure; decline in social services; stagnation of local and regional economies; soaring unemployment; psycho-social problems; and increased levels of poverty and malnutrition.

Planning for mine closure is key, and when companies work collaboratively with local communities and labour-sending areas to plan for mine closure many of the negative impacts, especially those deriving from an unhealthy economic or social dependency on the mine, can be avoided or mitigated. An effective mine closure planning process involves communities in the setting of closure goals, the development of action plans, and estimation of the costs involved in achieving the desired outcomes. Also, the early involvement of workers and communities in planning for closure, ideally at the outset of mining exploration (See C.01), increases the transparency, credibility and chances of successful outcomes.

Some of the potential strategies for minimising impacts related to closure include: putting programmes and systems in place to support a diverse economy (See D.04); building capacity and skills to manage and maintain services and infrastructure initially supported by the mine (e.g., health, education, water or energy facilities); transforming mining-related infrastructure for other uses, such as agricultural production; and creating mechanisms to ensure that benefits established in local or community

development agreements or through other initiatives will continue to accrue beyond the life of the mine.

Additionally, the involvement of workers in retrenchment planning (See E.06) and provision of assistance such as training, career and financial counselling, job transfer opportunities and other resources will help them better manage the transition when the mine closes.

In addition to socio-economic considerations, effective mine closure planning aims to ensure that the post-mined landscape is physically safe and stable, functional ecosystems are restored, the risk of long-term pollution is minimised, and surrounding water supplies are protected, so that communities will have access to resources to support and sustain alternative livelihood ventures in a post-mining era. Climate change implications also need to be taken into account when planning for post-closure viability. To the extent possible, restoration and rehabilitation efforts take place in a progressive manner, i.e. concurrent with mining operations. Not only does this reduce a company's long-term liabilities, it also demonstrates to stakeholders that the company is proactive in its approach to mitigating environmental impacts.

Leaving a positive post-mining legacy requires a significant investment. Environmental rehabilitation and restoration costs alone can run into the tens or hundreds of millions of dollars depending on the scale of the mining operation, the range of issues to be addressed prior to closure, and whether or not there are systems that need to be maintained post-closure to ensure long-term protection of the environment. It is therefore in the interests of all stakeholders that companies are able to demonstrate that they have sufficient funds set aside to cover the costs of mine closure and post-closure activities, and that these financial sureties are quarantined from other company assets so that they will be available in the event of bankruptcy or government abuse.

Financial sureties may also provide funds to support the continued longevity and success of social services, facilities and socio-economic programmes post mine closure. Mining companies in collaboration with affected communities and local governments, can develop post-closure socio-economic financial assurance mechanisms, even when they are not required by government regulations.

When mining companies leave behind negative socio-economic or environmental legacies, they discredit their own reputation as well as that of the industry as a whole. A portfolio of safe, stable and prospering post-closure sites and communities is more likely to engender support for a company's 'social licence to operate' in new areas. As a result, leading mining companies are increasingly integrating social and economic considerations in an operation's lifecycle planning to better ensure that mining projects will create long-term value for producing countries and affected communities and workers, both during mining and post-closure.

Action

The company has systems in place to ensure its operations plan and manage post-closure transition in collaboration with affected communities, to seek to ensure continued viability of their livelihoods.

Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:

- a. Identify, from the earliest stage and in collaboration with local stakeholders, the impacts their closure will have on affected communities?
- b. Develop post-closure transition management plans from the earliest stage and in consultation with local stakeholders, aimed at ensuring continued livelihood viability for affected communities?
- c. Consider post-mining land-use opportunities in the development of these management plans?

Action

The company has systems in place to ensure its operations plan and manage post-closure transition in collaboration with workers, to seek to ensure them a just transition.

Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:

- a. Identify, from the earliest stage, the impacts their closure will have for workers?
- b. Develop post-closure transition management plans, from the earliest stage and in collaboration with workers, aimed at ensuring a just transition and continued livelihood viability for workers?
- c. Develop partnerships with government, other industries or companies to address workers' livelihood needs?

Effectiveness

The company tracks, reviews and acts to improve its performance on progressive mine rehabilitation.

Can your company demonstrate that it systematically:

- a. Tracks and discloses data, against targets and across successive time periods, on its implementation of progressive rehabilitation plans throughout its operations?
- b. Audits and/or reviews its performance on progressive mine rehabilitation?
- c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve its performance on progressive mine rehabilitation?

Action

The company discloses financial surety arrangements for socio-economic liabilities related to mine closure and post-closure.

Can your company demonstrate that it publicly:

- a. Discloses financial surety arrangements for the closure of all its operations, related to workers and communities?
- b. Discloses financial arrangements to ensure coverage of longer-term socio-economic aspects of closure and post-closure?
- c. Discloses this information on a project-disaggregated basis?

C.06 Mergers, Acquisitions and Disposals Due Diligence

The global mining industry is subject to frequent buying, selling and combining of companies and mining properties. Every mining company and mine project has unique characteristics that may create financial, legal or reputational risks for purchasers and sellers. The merger, acquisition or disposal of a company or project can also create economic, environmental, social and human rights risks for communities and workers. For example, restructuring that often follows mergers may result in layoffs and associated community impacts.

It is difficult to predict how a change in mine ownership might affect environmental protection or social and economic development. Past commitments to communities may be ignored or overhauled completely, perhaps leading to increased conflicts, human rights abuses or environmental contamination; while in other cases, new owners can bring a stronger commitment to economic and social development, environmental protection and community relations.

Typically, prior to carrying out mergers, acquisitions or disposing of mining properties companies undertake due diligence to understand the inherited and future risks, and consider whether or not it is possible to adequately mitigate the risks before moving forward. Many companies now go beyond assessing only financial risks, and carry out more detailed assessments of environmental, social, governance and human rights risks such as those related to corruption or bribery (See B.01), in merger, acquisition or disposal decisions.

Full disclosure of existing and potential liabilities is often mandated by legislation. But companies can go beyond that and integrate measures into sale and purchase agreements that ensure a high level of protection for the environment and communities. For example, prior to disposing of a mining property companies can ensure that buyers have the technical expertise to responsibly operate the mine, a demonstrated track record related to ESG, and that adequate financial securities will be in place after the sale to carry out environmental remediation.

ESG due diligence makes good business sense. Mergers and acquisitions have the potential to catapult companies into markets where legal regimes are not protective of human health or the environment; where economies are weak and services limited; where access to resources is more competitive; or where there is a history of poor relationships between the mining industry and communities. These situations can translate into high costs for companies in the form of legal actions, operational delays, staff time spent on mitigating unanticipated issues, reputational damage from conflicts with communities, and loss of confidence from investors.

Similarly, disposal of mining properties creates potential long-term liabilities for buyers, but also for sellers, governments and communities if purchasers do not have the technical expertise or financial wherewithal to adequately manage and remediate environmental liabilities.

Action

The company has systems in place to identify and assess potential ESG risks, including human rights risks, associated with mergers, acquisitions and disposals.

Can your company demonstrate at the corporate level that it has systems in place to ensure its due diligence on mergers, acquisitions and disposals covers:

- a. Salient environmental issues?
- b. Salient social and human rights issues?
- c. Salient governance issues?

Scoring Framework:

C.01.1 The company commits to adopt a lifecycle approach to ensure it manages EESG issues throughout the entire project lifecycle, from exploration to post-closure. (/6.00)

Can your company demonstrate at the corporate level that it has:

a. *Formalised its commitment, that is endorsed by senior management, to adopt a lifecycle approach to ensure it manages EESG issues throughout the entire project lifecycle, from exploration to post-closure?*

- 2 points** The company commits to adopt a lifecycle approach to ensure it manages EESG issues throughout the entire project lifecycle, from exploration to post-closure in a formal document which covers all of the company's activities and is endorsed by senior management.
- 1 point** The company commits to adopt a lifecycle approach [...] in a formal document which covers all of the company's activities, but there is no evidence that this commitment is endorsed by senior management
OR
The company commits to adopt a lifecycle approach [...] in a formal document which is endorsed by senior management but does not cover all of the company's activities OR
The company commits to adopt a lifecycle approach [...] in a formal document which is endorsed by senior management, but it only covers some project development and operational phases of its operations.
- 0.5 point** The company refers to the need for adopting a lifecycle approach [...], but does not make a clear commitment in a formal document which is endorsed by senior management.

b. *Assigned senior management or board-level responsibilities and accountability for carrying out this commitment?*

- 2 points** The company has a senior management level and/or Board level function responsible for carrying out this commitment and there is detailed information on its actual scope, role and accountability.
- 1 point** The company has a senior management level and/or Board level function responsible for carrying out this commitment but there is limited information on its actual scope, role and accountability
OR
The company provides evidence qualifying for a score of 2, but the company scored 1 under a).
- 0.5 point** The company briefly mentions a function at the senior management level and/or Board level for carrying out this commitment, but does not provide any additional information
OR
The company provides evidence qualifying for a score of 2 or 1, but the company scored 0.5 under a)

c. *Committed financial and staffing resources to implement this commitment?*

- 2 points** The company has company-wide operational-level teams responsible for coordinating efforts on working on a lifecycle approach throughout the project development and operational phases of its operations
OR

- The company conducts company-wide awareness and/or training programmes and/ or workshops and/or activities related to its commitment to adopt a lifecycle approach, and there is detailed evidence of the specific financial and/or staffing resources committed.
- 1 point** The company conducts company-wide programmes/activities related to adopting a lifecycle approach, but there is limited information on the actual financial and/or staffing resources committed
OR
The company has company-wide operational-level teams working on adopting a lifecycle approach but only on some limited aspects of adopting a lifecycle approach OR
The company allocates financial and/or staffing resources to implement this commitment (programmes/activities and/or teams) but not on a company-wide basis OR
The company provides evidence qualifying for a score of 2, but the company scored 1 under a).
- 0.5 point** The company provides limited evidence of company-wide programmes/activities/ staffing relating to covering some aspects of a lifecycle approach
OR
The company provides evidence qualifying for a score of 2 or 1, but the company scored 0.5 under a).

C.02.1 The company has systems in place to integrate ESG criteria into the stage-gating process in investment decision-making.

Can your company demonstrate at the corporate level that it has systems in place to:

a. Identify ESG criteria to be met during each stage of its investment decision-making processes?

- 2 points** The company has company-wide systems in place to identify environmental and social criteria to be met during each stage of its investment decision-making processes, and there is detailed evidence of the scope and content of these systems.
- 1 point** The company provides a limited narrative description of systems in place to identify social and environmental criteria to be met during its investment decision-making processes, but there is no information about the scope, content and actual implementation of these systems
OR
The company provides evidence of a company-wide approach to identify social and environmental criteria to be met during its investment decision-making processes, but there is no evidence of company-wide systems in place.
- 0.5 point** The company makes very brief mention of its approach to identify social and/or environmental criteria to be met during its investment decision-making processes, but there is no evidence of company-wide systems in place.

b. Apply these identified ESG criteria during each stage of its investment decision-making processes?

- 2 points** The company has company-wide systems in place to apply social and environmental criteria during its investment decision-making processes, and there is detailed evidence of the scope and content of these systems.
- 1 point** The company provides a limited narrative description of systems in place to apply social or environmental criteria during its investment decision-making processes, but there is no information about the scope, content and actual implementation of these systems
OR
The company provides evidence of a company-wide approach to identify social and environmental criteria to be applied during its investment decision-making processes, but there is no evidence of systems in place

OR

The company has systems in place to apply social and environmental criteria during its investment decision-making processes, and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis.

0.5 point

The company makes very brief mention of its approach to apply social and/or environmental criteria during its investment decision-making processes, but there is no evidence of company-wide systems in place.

c. Ensure appropriately qualified personnel are responsible for applying these identified ESG criteria in investment decision-making process?

2 points

The company has company-wide system in place to ensure that appropriately qualified personnel are responsible for applying ESG criteria in its investment decision-making processes, and there is detailed evidence of the scope and content of these systems.

1 point

The company has systems in place to ensure that appropriately qualified personnel are responsible for applying the identified ESG criteria in its investment decision-making processes, but there is limited evidence of the scope and/or content of these systems.

0.5 point

The company demonstrates that some attention has been given to having appropriately qualified personnel responsible for applying the identified ESG criteria in investment decision-making processes, but there is no evidence of company-wide systems in place.

C.03.1 The company has systems in place to ensure its operations engage local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans (/6.00)

Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:

a. Develop and maintain emergency preparedness and response plans?

2 points

The company has company-wide systems in place to ensure its operations develop and maintain emergency preparedness and response plans, and there is detailed evidence of the scope and content of these systems.

1 point

The company has systems in place to ensure its operations develop and maintain emergency preparedness and response plans, but there is limited evidence of the scope and/or content of these systems

OR

The company provides evidence that all its operations have developed emergency response plans

OR

The company has systems in place to ensure its operations develop and maintain emergency preparedness and response plans, and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis.

0.5 point The company has systems in place to ensure its operations develop and maintain emergency preparedness and response plans, but these systems are limited to one specific category of emergencies/risks.

b. Systematically engage with local stakeholders (e.g. local authorities and communities) in the design of emergency response plans?

2 points The company has company-wide systems in place to ensure its operations engage with local authorities and local communities in the design of emergency response plans, and there is detailed evidence of the scope and content of these systems.

1 point The company has company-wide systems in place to ensure its operations engage with local authorities and local communities in the design of emergency response plans, but there is limited evidence of the scope and/or content of these systems OR

The company has systems in place to ensure its operations engage with local authorities or local communities in the design of emergency response plans, and there is detailed evidence of the scope and content of these system, but these do not cover all of the company's activities OR

The company has systems in place to ensure its operations engage with local authorities and local communities in the design of emergency response plans, and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis.

0.5 point The company states that it engages with local stakeholders in the design of emergency response plans, but there is no information beyond narrative statement OR

The company provides evidence of only one or two operations having engaged with local stakeholders (authorities or communities).

c. Systematically engage with local stakeholders in the testing of these response plans?

2 points The company has company-wide systems in place to ensure its operations engage with local authorities and local communities in the testing of these response plans, and there is detailed evidence of the scope and content of these systems.

1 point The company has company-wide systems in place to ensure its operations engage with local authorities and local communities in the testing of these response plans, but there is limited evidence of the scope and/or content of these systems OR

The company has systems in place to ensure its operations engage with local authorities or local communities in the testing of these response plans, and there is detailed evidence of the scope and content of these systems, but not on a company wide basis.

0.5 point The company states that it engages with local stakeholders in the testing of these response plans, but there is no information disclosed beyond a narrative description OR

The company provides evidence of only one or more isolated cases of operations having engaged with local stakeholders in the testing of these response plans.

C.03.2 The company has systems in place to ensure its operations identify, assess, avoid, and mitigate risks for workers and communities associated with pandemics and high-burden diseases that are relevant to the company's operations. (/6.00)

Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:

a. Identify and assess risks for workers and affected communities associated with pandemics and high-burden diseases that are relevant to the company's operations?

- 2 points** The company has company-wide systems in place to ensure its operations identify and assess risks for workers and affected communities associated with pandemics and high-burden diseases that are relevant to the company's operations, and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its operations identify and assess risks for workers and affected communities associated with pandemics and high-burden diseases [...], but there is limited evidence of the scope and/or content of these systems.
OR
The company has company-wide systems in place to ensure its operations identify and assess risks for workers and affected communities associated with pandemics OR high-burden diseases [...], and there is detailed evidence of the scope and content of these systems
OR
The company has company-wide systems in place to ensure its operations identify and assess risks for workers OR affected communities associated with pandemics and high-burden diseases [...], and there is detailed evidence of the scope and content of these systems
OR
The company has company-wide systems in place to ensure its operations identify and assess risks for workers and affected communities associated with pandemics and high-burden diseases [...], and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis.
- 0.5 point** The company provides a limited narrative description of systems in place to ensure its operations identify and assess risks for workers or affected communities associated with pandemics or high-burden diseases [...], but there is no information about the scope, content and actual implementation of these systems
OR
The company provides evidence of only one or two cases of operations having identified and assessed risks for workers or affected communities associated with pandemics or high-burden diseases [...].

b. Develop strategies and plans, in collaboration with workers, to address identified risks for workers?

- 2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for workers, and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for workers, but there is limited evidence of the scope and/or content of these systems
OR
The company has systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for workers, and there is detailed evidence of the scope and content of these system, but these do not cover all of the company's activities
OR
The company has systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for workers, and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis
- 0.5 point** The company states that it has systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for workers, but there is no information beyond narrative statement
OR
The company provides evidence of only one or two operations having developed strategies and plans to address and mitigate identified risks for workers.

c. Develop strategies and plans, in collaboration with affected communities, to address identified risks for affected communities?

- 2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for project-affected communities, and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for project-affected communities, but there is limited evidence of the scope and/or content of these systems
OR
The company has systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for project-affected communities, and there is detailed evidence of the scope and content of these system, but these do not cover all of the company's activities
OR
The company has systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for project-affected communities, and there is detailed evidence of the scope and content of these systems, but not on a company-wide.
- 0.5 point** The company states that it has systems in place to ensure its operations develop strategies and plans to address and mitigate identified risks for project-affected communities, but there is no information beyond narrative statement
OR
The company provides evidence of only one or two operations having developed strategies and plans to address and mitigate identified risks for project-affected communities.

C.03.3 The company publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, including insurance against tailings facility failure, throughout its operations. (/6.00)

Can your company demonstrate at the corporate level that it:

a. Publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, including insurance against tailings facility failure?

- 2 points** The company publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, including insurance against tailings facility failure.
- 1 point** The company publicly discloses some information about financial assurance that is provided for disaster management and recovery, including insurance against tailings facility failure.
- 0.5 point** The company publicly discloses some information about financial assurance that is provided for disaster management and recovery, but it does not include insurance against tailings facility failure.

b. Includes in this disclosure information on specific financial assurance provisions on a mine-site-disaggregated basis?

- 2 points** The company includes in this disclosure information on specific financial assurance provisions on a mine-site-disaggregated basis.
- 1 point** The company includes in this disclosure information on specific financial assurance provisions on a mine-site-disaggregated basis, but only for some mine sites
OR
The company includes in this disclosure information on specific financial assurance provisions on a country-disaggregated basis.
- 0.5 point** There is evidence of only one or two mine sites having disclosed this information.

c. Updates this information on a yearly basis?

- 2 points** The company updates this information on a yearly basis.
- 1 point** The company updates this information from time to time.
- 0.5 point** The company states it updates this information regularly, but there is no information beyond narrative statement.

C.04.1 The company tracks, reviews and acts to improve its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations. (/6.00)

Can your company demonstrate that it systematically:

a. Tracks and discloses data, against targets and across successive time periods, on its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations?

2 points The company discloses recent company-wide data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared against targets and across successive time periods.

1 point The company discloses recent company-wide data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared against targets but not compared across successive time periods

OR

The company discloses recent company-wide data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared across successive time periods but not against targets

OR

The company discloses company-wide data on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations,, and the data is compared against targets and across successive time periods, but the data is outdated (older than the assessment period)

OR

The company discloses recent data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared against targets and across successive time periods, but the data does not cover all of the company's activities.

0.5 point The company discloses recent company-wide data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, but the data is not compared against targets neither across successive time periods

OR

The company discloses recent data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared against targets but not compared across successive time periods and does not cover all of the company's activities

OR

The company discloses recent data (within the assessment period) on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared across successive time periods but not against targets and does not cover all of the company's activities

OR

The company discloses data on its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and the data is compared against targets and across successive time periods, but the data is outdated (older than the assessment period) and does not cover all of the company's activities.

b. Audits and/or reviews its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations?

2 points The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess its performance on materials management to optimise re-use, repair, and recycling of goods in their operations.

1 point The company discloses limited data on reviews and/or audits conducted within the assessment period to assess its performance on materials management to optimise re-use, repair, and recycling of goods in their operations.

0.5 point The company states that regular reviews and/or audits its performance on on materials management to optimise re-use, repair, and recycling of goods in their operations are required and shall be conducted by an identified internal or external body, but there is no information on reviews and/or audits that were actually conducted, beyond statement.
OR
The company states that a relevant review/audit was carried out but gives no details on the content and scope of the audit

c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve its performance on materials management to optimise re-use, repair, and recycling of goods used in their operations?

2 points The company discloses information on reviews and/or audits that were actually conducted and discloses data on how it has integrated recommendations and acted on findings to continuously improve performance on materials management to optimise re-use, repair, and recycling of goods in their operations.

1 point The company states that it integrates the recommendations from these audits and/or reviews to continuously improve its performance on materials management to optimise re-use, repair, and recycling of goods in their operations, and has disclosed information on reviews and/or audits that were actually conducted, but there is no information on the integration of recommendations, beyond statement.

0.5 point The company states that it integrates the recommendations from these audits and/or reviews to continuously improve its performance on on materials management to optimise re-use, repair, and recycling of goods in their operations, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations.

C.05.1 The company has systems in place to ensure its operations plan and manage post-closure transition in collaboration with affected communities, to seek to ensure continued viability of their livelihoods. (/6.00)

Can your company demonstrate that it has systems in place to ensure its operations:

a. Identify, from the earliest stage and in collaboration with local stakeholders, the impacts their closure will have on affected communities?

2 points The company has company-wide systems in place to ensure its operations identify the impacts their closure will have on affected communities and there is evidence that these systems ensure that impact identification is done at an early stage and in consultation with local stakeholders.

1 point The company has company-wide systems in place to ensure its operations identify the impacts their closure will have on affected communities, but there is no evidence that these systems ensure that impact identification involves consultation with local stakeholders
OR

The company has company-wide systems in place to ensure its operations identify the impacts their closure will have on affected communities but there is no evidence that these systems involve identification of impacts from an early stage
OR

The company has systems in place to ensure its operations identify the impacts their closure will have on affected communities and there is evidence that these systems ensure that impact identification is done at an early stage and in consultation with local stakeholders, but not on a company-wide basis.

0.5 point The company provides a limited narrative description of systems to ensure its operations identify the impacts their closures will have on affected communities, but there is no information about the scope, content and actual implementation of these systems
OR

The company provides evidence of only one or two operations having identified the impacts their closure will have on affected communities

b. Develop post-closure transition management plans from the earliest stage and in collaboration with local stakeholders, aimed at ensuring continued livelihood viability for affected communities?

- 2 points** The company has company-wide systems in place to ensure its operations develop post-closure transition management plans aimed at ensuring continued livelihood viability for affected communities and there is evidence that these systems ensure that plans are developed at an early stage and in collaboration with local stakeholders.
- 1 point** The company has company-wide systems in place to ensure its operations develop post-closure transition management plans aimed at ensuring continued livelihood viability for affected communities, but there is no evidence that these systems ensure collaboration with local stakeholders
OR
The company has company-wide systems in place to ensure its operations develop post-closure transition management plans aimed at ensuring continued livelihood viability for affected communities, but there is no evidence that these systems involve developing plans from an early stage
OR
The company has systems in place to ensure its operations develop post-closure transition management plans aimed at ensuring continued livelihood viability for affected communities and there is evidence that these systems ensure that developing plans is done at an early stage and in collaboration with local stakeholders, but there is no evidence of company-wide systems in place.
- 0.5 point** The company provides a limited narrative description of systems in place to ensure its operations develop post-closure transition management plans aimed at ensuring continued livelihood viability for affected communities, but there is no information about the scope, content and actual implementation of these systems
OR
The company provides evidence of only one or two operations having developed post-closure transition management plans aimed at ensuring continued livelihood viability for affected communities.

C.05.2 The company has systems in place to ensure its operations plan and manage post-closure transition in collaboration with workers, to seek to ensure them a just transition. (/6.00)

Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:

a. Identify, from the earliest stage, the impacts their closure will have for workers?

- 2 points** The company has company-wide systems in place to ensure its operations identify the impacts their closure will have for workers, and there is evidence that these systems ensure that impact identification is done at an early stage.
- 1 point** The company has systems in place to ensure its operations identify the impacts their closure will have for workers, but there is no evidence that these systems involve identification of impacts from an early stage.
OR
The company has systems in place to ensure its operations identify the impacts their closure will have for workers, but not on company-wide basis.
- 0.5 point** The company provides a limited narrative description of its approach to ensure its operations identify the impacts their closures will have for workers, and there is no evidence of company-wide systems in place
OR
The company provides evidence of only one or two cases of operations having identified the impacts their closure will have for workers.

b. Develop post-closure transition management plans, from the earliest stage and in collaboration with workers, aimed at ensuring a just transition and continued livelihood viability for workers?

- 2 points** The company has company-wide systems in place to ensure its operations develop post-closure transition management plans, ensuring continued livelihood viability for workers, and there is evidence that these systems involve developing plans from an early stage and in collaboration with workers
- 1 point** The company provides evidence of systems to ensure its operations develop post- closure transition management plans, ensuring continued livelihood viability for workers, but there is no evidence that these systems ensure collaboration with local stakeholders
OR
The company provides evidence of systems to ensure its operations develop post- closure transition management plans, ensuring continued livelihood viability for workers, but there is no evidence that these systems involve developing plans from an early stage OR
The company provides detailed evidence of a generalised approach to ensure its operations develop post-closure transition management plans, ensuring continued livelihood viability for workers, but there is no evidence of company-wide systems in place.
- 0.5 point** The company provides a limited narrative description of systems in place to ensure its operations develop post-closure transition management plans, ensuring continued livelihood viability for workers, but there is no information about the scope, content and actual implementation of these systems.
OR
The company provides evidence of only one or two operations having developed post-closure transition management plans, ensuring continued livelihood viability for workers.

c. Develop partnerships with government, other industries or companies to address workers' livelihood needs?

- 2 points** The company has company-wide systems in place to develop partnerships with government, other industries or companies to address workers' livelihood needs, and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has systems to ensure its operations develop partnerships with government, other industries or companies to address workers' livelihood needs, but there is limited evidence of the scope and/or content of these systems.
- 0.5 point** The company provides evidence of only one or two isolated cases of operations having developed develop partnerships with government, other industries or companies to address workers' livelihood needs.

C.05.3 The company tracks, reviews and acts to improve its performance on progressive mine rehabilitation. (/6.00)

Can your company demonstrate that it systematically:

a. Tracks and discloses data, against targets and across successive time periods, on its implementation of progressive rehabilitation plans throughout its operations?

- 2 points The company discloses recent company-wide data (within the assessment period) on its implementation of progressive rehabilitation plans and the data is compared across successive time periods.
- 1 point The company discloses recent company-wide data (within the assessment period) on its implementation of progressive rehabilitation plans, but the data is not disclosed across successive time periods
OR
The company discloses company-wide data on its implementation of progressive rehabilitation plans, and the data is compared across successive time periods, but the data is outdated (older than the assessment period).
- 0.5 point The company discloses recent data (within the assessment period) on its implementation of progressive rehabilitation plans, but the data does not cover all of the company's activities
OR
The company discloses recent data (within the assessment period) showing rehabilitated areas compared across successive time periods, but there is no evidence that these relate to progressive rehabilitation of end-of-life closure management

b. Audits and/or reviews its performance on progressive mine rehabilitation?

- 2 points The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess its performance on progressive mine rehabilitation.
- 1 point The company discloses limited data on reviews and/or audits conducted within the assessment period to assess its performance on progressive mine rehabilitation.
- 0.5 point The company states that regular reviews and/or audits its performance on progressive mine rehabilitation are required and shall be conducted by an identified internal or external body, but there is no information on reviews and/or audits that were actually conducted, beyond statement.
OR
The company states that a relevant review/audit was carried out but gives no details on the content and scope of the audit

c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve its performance on progressive mine rehabilitation?

- 2 points The company discloses information on reviews and/or audits that were actually conducted and discloses data on how it has integrated recommendations and acted on findings to continuously improve performance on progressive mine rehabilitation.
- 1 point The company states that it integrates the recommendations from these audits and/or reviews to continuously improve its performance on progressive mine rehabilitation, and has disclosed information on reviews and/or audits that were actually conducted, but there is no information on the integration of recommendations, beyond statement.
- 0.5 point The company states that it integrates the recommendations from these audits and/or reviews to continuously improve its performance on progressive mine rehabilitation, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations.

C.05.4 The company discloses financial surety arrangements for socio-economic liabilities related to mine closure and post-closure. (/6.00)

Can your company demonstrate at the corporate level that it publicly:

a. Discloses financial surety arrangements for the closure of all its operations, related to workers and communities?

- 2 points The company discloses financial surety arrangements for the closure of all its operations, and these relate to workers and communities.
- 1 point The company discloses financial surety arrangements for the closure of all its operations, but these relate to workers only, or communities only.
- 0.5 point The company discloses one or two examples of financial surety arrangements, and there is an indication on how these relate to workers or communities
OR
The company provides a limited narrative description of its approach to financial surety, and there is an indication on how these relate to workers or communities

b. Discloses financial arrangements to ensure coverage of longer-term socio-economic aspects of post-closure?

- 2 points** The company discloses financial arrangements to ensure coverage of longer term socio-economic aspects of post-closure, and these arrangements cover all of the company's activities.
- 1 point** The company discloses financial arrangements to ensure coverage of longer term socio-economic of post-closure, but these arrangements do not cover all of the company's activities.
- 0.5 point** The company discloses only one or two cases of operations having arranged financial surety to ensure coverage of longer-term socio-economic aspects of post-closure
OR
The company provides a limited narrative description of its approach to financial arrangements to ensure coverage of longer-term socio-economic aspects of post- closure, but does not disclose any financial arrangements.

c. Discloses this information on a project-disaggregated basis?

- 2 points** The company discloses the information on a project-disaggregated basis for all its operations.
- 1 point** The company discloses the information on a country-disaggregated basis.
- 0.5 point** The company discloses the information for one or two mine sites only.

C.06.1 The company has systems in place to identify and assess potential ESG risks, including human rights risks, associated with mergers, acquisitions and disposals (/6.00)

Can your company demonstrate at the corporate level that it has systems in place to ensure its due diligence on mergers, acquisitions and disposals covers:

a. Salient environmental issues?

- 2 points** The company has company-wide systems in place to ensure its due diligence on mergers, acquisitions and disposals covers salient environmental issues and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its due diligence on mergers or acquisitions or disposals covers salient environmental issues.
- 0.5 point** The company provides evidence of only one or two cases of having covered salient environmental issues in mergers or acquisitions or disposals
OR
The company mentions that its due diligence on mergers or acquisitions or disposals covers salient environmental issues, but does not provide any additional information

b. Salient social and human rights issues?

- 2 points** The company has company-wide systems in place to ensure its due diligence on mergers, acquisitions and disposals covers salient social and human rights issues and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its due diligence on mergers or acquisitions or disposals covers salient social or human rights issues.

- 0.5 point The company provides evidence of only one or two cases of having covered social or salient human rights issues in mergers or acquisitions or disposals.
OR
The company mentions that its due diligence on mergers or acquisitions or disposals covers salient social or human rights issues, but does not provide any additional information.

c. Salient governance issues?

- 2 points The company has company-wide systems in place to ensure its due diligence on mergers, acquisitions and disposals covers salient governance issues and there is detailed evidence of the scope and content of these systems.
- 1 point The company has company-wide systems in place to ensure its due diligence on mergers or acquisitions or disposals covers salient governance issues.
- 0.5 point The company provides evidence of only one or two cases of having covered salient governance issues in mergers or acquisitions or disposals
OR
The company mentions that its due diligence on mergers or acquisitions or disposals covers salient governance issues, but does not provide any additional information