

## **D. Community Wellbeing**

Mining projects have the potential to transform communities in positive and negative ways. Economic benefits may be created through the provision of jobs and opportunities for local businesses to supply services or products to the mine. On the other hand, mining may also diminish or destroy natural resources that provide food, livelihoods and services to communities. The social character of a community may also shift with the influx of migrant mine labour, and mining-related income and benefits may be distributed in an inequitable manner, which can create conflicts within communities and even families. Together, the environmental and social impacts related to mining may result in the infringement of multiple human rights.

As with any long-term relationship, company-community relationships are complex. Mining companies are often faced with the challenge of satisfying the wishes of disparate groups, and without thoughtful planning and interventions it is inevitable that conflicts will arise. Companies that approach communities early in the project lifecycle and demonstrate a willingness to engage with all stakeholders in an open, respectful manner are more likely to build trust, and those that put in place effective systems to receive and remedy community complaints will be more likely to maintain positive relationships and successfully prevent or remedy human rights risks and impacts.

The creation of positive economic, environmental and social benefits requires active engagement with communities throughout the mine lifecycle. Through ongoing collaboration with a wide range of stakeholders including marginalised and vulnerable groups in the planning, design and implementation of mine-sponsored community investments and mining-related opportunities, mining companies can better ensure that they will leave behind healthy, viable communities when a mine closes.

## **D.01 Human Rights**

Mining operations have the potential to affect an array of human rights, ranging from those that are specific to workers (See Section E), women (See D.07), children (See D.04) or Indigenous Peoples (See D.08 and D.09) to those applying to all human beings. Depending on the political, social and operational context of the mine (e.g., See D.02, D.05 , D.10 and D.11), different human rights may be affected including the rights to health; safe water; an adequate standard of living; life, liberty and security of person; non-discrimination; safe work environment; freedom of movement; access to remedy; or others.

Human rights, land, environmental, and labour rights defenders are accorded particular rights and protections, as outlined in the United Nations' Declaration on Human Rights Defenders. Globally, however, community members, Indigenous Peoples, labour rights defenders, union organisers, land, environmental and human rights defenders who express opposition to mining projects continue to suffer human rights abuses, stigmatisation, harassment, attacks, or worse. Global Witness recorded 212 killings of land and environmental defenders in 2019, with the mining sector ranking first, followed by agribusiness, in the number of such killings.

It is now widely accepted that all businesses have a responsibility to respect human rights. The UN Guiding Principles on Business and Human Rights (i.e., UNGP) is the authoritative global standard on business and human rights, providing corporations with a framework for carrying out due diligence to manage their human rights risks and impacts.

The UNGP recommend that companies assess the risks to human rights from their own activities, or those that may be directly linked to their operations, products or services through business relationships (See also B.08). The Principles set out how a company's subsequent actions should prioritise those human rights that are most salient to the mining operation, i.e., those that are a risk of creating the most severe negative impacts on people.

When risks to human rights are identified, companies are expected to take steps to prevent, mitigate and remediate impacts, including providing redress for victims (See D.12). Additionally, when a company becomes aware of credible cases of human rights abuses in its area of operation, international norms require that the company should report those incidents to the relevant government authorities and international human rights bodies.

Other aspects of human rights due diligence include stakeholder engagement, which may include a collaborative and participatory approach to the assessment of human rights risks and impacts; having a mechanism for stakeholders to raise human rights related grievances (See D.12); monitoring the effectiveness of the company's actions; and communicating how risks are addressed. The UNGP Reporting

Framework provides guidance to companies on how they can efficiently and cohesively report on how they manage risks to human rights.

Companies that undertake comprehensive human rights due diligence can experience financial and reputational benefits, and are more likely to contribute positively to the outcomes sought by the UN Sustainable Development Goals (i.e., ending poverty, protecting the planet and ensuring prosperity for all). Preventing, mitigating and remediating infringements on human rights increases the ability to retain the best workers by creating safe and secure work environments; enhances the health and wellbeing of communities; helps strengthen government institutions and accountability; and contributes to a more attractive investment climate, all of which help to foster sustainable development.

<b>Commitment</b>	<p><b>The company commits to respect human rights, in accordance with the UN Guiding Principles on Business and Human Rights.</b></p> <p><i>Can your company demonstrate at the corporate level that it has:</i></p> <ol style="list-style-type: none"><li>a. Formalised its commitment, that is endorsed by senior management, to respect human rights in accordance with the UNGPs?</li><li>b. Assigned senior management or board-level responsibilities and accountability for carrying out this commitment?</li><li>c. Committed financial and staffing resources to implement this commitment?</li></ol>
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<b>Action</b>	<p><b>The company has systems in place, in accordance with the UN Guiding Principles on Business and Human Rights, to carry out regular human rights due diligence across all its operations, to assess and address human rights risks.</b></p> <p><i>Can your company demonstrate at the corporate level that it:</i></p> <ol style="list-style-type: none"><li>a. Has systems in place to ensure its operations identify and assess salient impacts of their activities on human rights?</li><li>b. Has systems in place to ensure its operations develop strategies and plans to prevent, mitigate and account for how they address these identified impacts?</li><li>c. Systematically tracks the implementation of these strategies and plans?</li></ol>
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<b>Effectiveness</b>	<p><b>The company tracks, reviews and acts to improve its performance on preventing and remedying adverse impacts on human rights associated with its areas of operations.</b></p> <p><i>Can your company demonstrate that it systematically:</i></p> <ol style="list-style-type: none"><li>a. Tracks and discloses data, across successive time periods, on its performance on preventing and remedying adverse impacts on human rights across its mine sites, including number and nature of cases and actions taken in response?</li><li>b. Audits and/or reviews the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights?</li><li>c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights?</li></ol>
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## Commitment

**The company commits to respect the rights and protections accorded to human rights, land, environmental, and labour rights defenders in its areas of operations.**

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

- a. Formalised its commitment, that is endorsed by senior management, to respect the rights and protections accorded to human rights, land, environmental, and labour rights defenders in its areas of operations?
- 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?

## D.02 Security and Conflict-Affected and High-Risk Areas (CAHRAs)

Many mines operating in challenging contexts rely on private or public security forces to protect their employees, products and properties. While security providers can help to maintain stability and safeguard the rule of law at mine sites, there is also a risk that a lack of oversight, inadequate training or other circumstances may lead to the inappropriate use of force and infringements of human rights by security providers. When security is not carried out in a manner that respects human rights, the impacts may be disproportionately felt by certain groups such as human rights defenders (See D.01), women, or children. There are numerous examples where extractive companies have been accused of complicity in the violent repression of protests, sometimes leading to fatalities or the sexual assault of local women and children. In certain cases, allegations have been made in relation to private security forces hired by extractives companies; in others, police or government military forces were the alleged perpetrators of the human rights violations.

When mines operate in countries with weak governance, or in conflict-affected or high-risk areas, risks to the operation and also to workers and communities are heightened. Such areas are often characterised by armed violence, criminal activity and widespread or serious human rights abuses, including sexual and gender-based violence, and, in some cases, the kidnapping or killing of company employees.

Mines located in conflict-affected areas may be pressured to make payments to armed forces or criminal elements, resulting in a company's complicity in illegal acts or human rights abuses. In some cases, the mere presence of a mine, with its real or perceived impacts and benefits, may create or exacerbate inter- or intra-community conflicts in what are already fragile circumstances. Given the high risks to companies, their workers and local communities, it is now a global expectation that businesses operating in conflict-affected or high-risk areas carry out due diligence and mitigation to avoid contributing to conflict, insecurity and human rights abuses when operating in those areas (See also D.01).

Governments bear the ultimate duty of maintaining law and order, and also of protecting their citizens from human rights abuses by third parties, but in some regions weak enforcement leaves people vulnerable to abuses. Regardless of whether or not producing country governments uphold their duty to protect the

human rights of their citizens, there is a recognised global expectation that corporations must respect human rights throughout all of their operations (See D.01). This includes taking action to prevent complicity in human rights abuses perpetrated by those linked in some way to their businesses, such as public or private security forces protecting their assets.

In 2000, the Voluntary Principles on Security and Human Rights (VPs) were developed through a multi-stakeholder initiative to provide guidance specifically for extractive industries on maintaining the safety and security of their operations within an operating framework that encourages respect for human rights. The VPs encourage companies to, among other things: assess risks related to security, potential for violence, human rights records of security providers, rule of law, conflict and equipment transfers; consult with communities and communicate security arrangements; ensure appropriate deployment and conduct of security forces; report or investigate allegations of human rights abuses; and train security forces and strengthen state institutions to ensure respect for human rights.

Some companies enter into contracts with private security forces or sign memoranda of understanding (MOU) with public security forces to delineate respective roles, duties, and obligations regarding security provision. The VPs recommend that companies encourage governments to make information on security arrangements transparent and accessible to the public, except for information that may create security, safety or human rights risks, and in an effort to increase transparency and build trust with affected communities and stakeholders some extractives companies have begun to disclose publicly their MOUs with public security forces.

While not mandatory, extra due diligence in conflict-affected areas and in the management of security arrangements is increasingly being supported by governments and adopted by mining companies who recognise that diligent management of conflict, security and human rights can contribute to: maintenance of company reputation and social license to operate; increased access to financing; a reduction in production delays; and reduced risk of human rights abuses and litigation.

## Action

**The company has systems in place to ensure its operations integrate human rights into their management of security personnel and private security forces, in line with the Voluntary Principles on Security and Human Rights.**

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

- a. Review the background of security personnel and private security forces they intend to employ, particularly with regard to the use of excessive force, in order to not employ individuals credibly implicated in human rights abuses to provide security services?
- b. Require from security personnel and private security forces, including through contractual provisions in agreements with security providers, to investigate and report all cases where physical force is used, and to provide medical aid to injured persons, including to offenders?
- c. Conduct investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces, and take appropriate disciplinary action?

## Effectiveness

**The company tracks, reviews and acts to improve its performance on supporting education and training of its security personnel, private, and public security forces, to prevent human rights abuses, in line with the Voluntary Principles on Security and Human Rights.**

*Can your company demonstrate that it systematically:*

- a. Tracks and discloses data, against targets and across successive time periods, on its performance on supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses?
- b. Audits and/or reviews the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses?
- c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses?

## Action

**Where applicable, the company has systems in place to ensure its operations carry out enhanced due diligence to identify, assess, avoid and mitigate risks for workers and communities specifically associated with the operations' presence in any conflict-affected and high-risk areas (CAHRAs), in line with the Voluntary Principles on Security and Human Rights.**

*Where applicable, can your company demonstrate at the corporate level that it:*

- a. Has systems in place to ensure its operations identify and assess risks for workers and communities specifically associated with their presence in any conflict-affected and high-risk areas?
- b. Has systems in place to ensure its operations develop strategies and plans to address these identified risks?
- c. Systematically tracks the implementation of these strategies and plans?

### **D.03 Community and Stakeholder Engagement**

Mining is a technically challenging industry, though it has been said that managing the complex relationships with communities and stakeholders may be even more difficult than getting the materials out of the ground. This is due in part to the fact that the stakeholders for any mining project are diverse, including women, men, youth, children, vulnerable or marginalised groups, community organisations, governments, non-governmental organisations, special interest groups and others) and they often hold vastly different opinions on, and interests in, the potential benefits and impacts associated with mining.

Many mining companies, governments and international financial institutions recognise that building relationships with those affected by or interested in a mining project can improve the identification and management of environmental and social risks, and long-term project viability. From the perspective of mining companies, the primary purpose of stakeholder engagement is to establish and maintain a constructive relationship with a variety of stakeholders over the lifecycle of a mine. However, developing relationships that are built on trust, mutual respect and understanding takes time and expertise. For this reason, many companies are beginning to engage with stakeholders from the earliest stages of project development, and are employing professional, dedicated staff to carry out engagement processes with appropriate management oversight and resources.

Stakeholder engagement is an active, ongoing process, which, depending on the mining project and the phase of mine development, may involve the following elements: stakeholder analysis and engagement planning; disclosure and dissemination of information; consultations related to project risks, impacts, mitigation strategies and benefits; community participation in project monitoring; a mechanism for raising complaints and ensuring remedy (See D.12); and reporting to stakeholders and affected communities.

The active participation of stakeholders in various impact assessments is key to ensuring that the interests, concerns and knowledge held by different stakeholders, particularly communities directly affected by a mining project, are adequately considered by the mining company. Stakeholder engagement in impact assessments will be most useful when communities are provided with timely and full information, to enable them to provide relevant input to the company.

There is a greater likelihood of meaningful engagement when companies collaborate with stakeholders to design culturally appropriate and accessible engagement processes, build stakeholder capacity, and remove barriers to participation. In particular, attention should be paid to including the participation of groups who may be disproportionately affected by a company's activities, such as women, youth, persons with disabilities, and marginalised or vulnerable groups within the affected communities. Additionally, the engagement of children should not be overlooked, as

they can offer unique perspectives on their experiences, vulnerabilities, interests and aspirations. However, attention should be paid to when direct engagement with children is critical versus when engagement with child rights advocates and stakeholder groups may be more appropriate.

Effective stakeholder engagement creates opportunities for two-way dialogue, so that stakeholders feel heard and can explore with the company how their concerns have been addressed. Such feedback can help companies track the effectiveness of their engagement efforts, and provide insights into how their processes might be improved over time.

Meaningful, proactive, inclusive community and stakeholder engagement that includes opportunities for dialogue and feedback can help a company gain and maintain a social licence to operate and reduce conflicts, thereby avoiding reputational risks and costs that may occur if stakeholder concerns are not identified and adequately addressed. It can also reduce time required to obtain approvals and negotiate agreements; improve corporate risk profiles; and increase access to capital on more favourable terms.

<b>Action</b>	<p><b>The company has systems in place to ensure its operations take specific measures to enable the participation of women, youth and persons with disabilities in discussions and decision-making on matters that may impact them.</b></p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to ensure its operations take specific measures to enable the participation of:</i></p> <ol style="list-style-type: none"><li>Women in discussions and decision-making on matters that may impact them?</li><li>Youth in discussions and decision-making on matters that may impact them?</li><li>Persons with disabilities in discussions and decision-making on matters that may impact them?</li></ol>
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<b>Effectiveness</b>	<p><b>The company tracks, reviews and acts to improve the quality of its relationships with affected communities.</b></p> <p><i>Can your company demonstrate that it systematically:</i></p> <ol style="list-style-type: none"><li>Tracks and discloses data, against targets and across successive time periods, on the quality of its relationships with affected communities?</li><li>Audits and/or reviews the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities?</li><li>Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures to build and maintain trust-based relationships with affected communities?</li></ol>
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#### **D.04 Economic and Social Viability**

Mining projects have the potential to transform the economic and social character of affected communities, neighbouring communities and labour-sending areas. The social and economic viability of mining-affected communities can be enhanced through the creation of business opportunities such as procurement contracts, as well as the creation of direct and indirect jobs.

The number of direct mine-related jobs for local workers can be significant, but many of those jobs are temporary, lasting only through the construction phase. During the mineral extraction phase jobs become more specialised, and without adequate training these jobs may go to skilled workers from outside local communities or producing countries. Generally of more significant and lasting benefit is the sourcing of goods and services from local businesses; procurement from local communities, especially when supported by strategic efforts to strengthen local entrepreneurship and business development, can transform local economies, build skills and generate employment opportunities, including for stakeholder groups unlikely to find work in the mine. (See A.02 for the benefits of supporting procurement opportunities for national and wider regional suppliers). Mining companies are increasingly reporting on their local procurement processes and performance and efforts are underway to encourage more mine-site-level reporting in order to support companies' management of local procurement and inform and empower suppliers, communities, governments, and other stakeholders.

If not properly managed the influx of new income and in-migration of workers and others can threaten the social and cultural integrity of communities, create social conflicts, lead to abuses of human rights, and disrupt traditional economic activities and the ecological services upon which communities depend.

Social impact assessment (SIA) is an important tool for reducing potential impacts and enhancing the social and economic prospects associated with mining projects. SIA is an ongoing process to identify how the wellbeing of a community, or particular groups within the community, might change as a result of the mining project, and then develop strategies to avoid, mitigate and manage impacts throughout the lifecycle of the mine. SIA is more likely to produce reliable information and viable long-term strategies when it is started early in the mining project cycle, and undertaken as a collaborative effort between the company and affected community and workers, ensuring the participation of women, youth and children or child rights advocates (See D.03), as well as other vulnerable groups.

In some cases, companies assess potential human rights impacts as part of the SIA (or part of an integrated environmental and social impact assessment). If this is not done, it is critical that an assessment of human rights risks be carried out as a standalone activity (See D.01), otherwise important risks to social viability may be overlooked. In both cases, an integrated approach that combines socio-economic

aspects to human rights, land, and environmental issues is essential to prevent harm and limit risk, beyond the boundaries of community and social investment.

Strategies to reduce impacts and increase long-term economic and social viability come in many forms. Some mining companies develop employment policies or agreements with communities that include local recruitment targets, training and career advancement opportunities focused on cultivating local mining professionals and supporting broader skills development (See A.04), or other initiatives like skills transfer or microfinance programmes to stimulate and diversify local economies. These policies, agreements and initiatives can help to ensure that local communities are able to benefit in the long term from both the direct and indirect job opportunities, and services or infrastructure created as a result of mine development. However, employment policies and programmes often fail to deliver equitable benefits to all segments of a community. To overcome this, some strategies specifically target youth, women, and other potentially marginalised or vulnerable groups, including Indigenous Peoples.

Social impact assessment and economic initiatives are most likely to deliver long-term social and economic benefits when they are developed through inclusive, participatory processes, provide transparency around terms and conditions, and include provisions for monitoring and evaluation (M&E) of the processes, outcomes and impacts. Local stakeholders will often have their own criteria for measuring the success or failure of social and economic policies and initiatives, and as a result M&E programmes that include communities directly are more likely to build trust in the processes and enhance the credibility and effectiveness of social, health and economic outcomes.

When planned and implemented well, mining-related social and economic initiatives can improve the current and long-term economic prospects and social wellbeing of mining-affected communities, which can in turn benefit mining companies by supporting a healthier workforce and improving productivity of mines, strengthening community relations and company reputation, earning and maintaining a social license to operate, and reducing conflicts that could lead to project delays or shutdowns.

<b>Action</b>	<p><b>The company has systems in place to ensure its operations encourage local entrepreneurship and support local business development, including for women.</b></p> <p><i>Can your company demonstrate at the corporate level that it:</i></p> <ol style="list-style-type: none"><li>Has systems in place to ensure its operations develop strategies and plans to develop local entrepreneurship and businesses?</li><li>Has systems in place to ensure its operations actively include women in these strategies and plans?</li><li>Systematically tracks the implementation of these strategies and plans?</li></ol>
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<b>Action</b>	<p><b>The company has systems in place to ensure its operations develop local procurement opportunities, including for women.</b></p> <p><i>Can your company demonstrate at the corporate level that it:</i></p> <ol style="list-style-type: none"> <li>a. Has systems in place to ensure its operations develop strategies and plans to develop local procurement opportunities?</li> <li>b. Has systems in place to ensure its operations actively include women in these strategies and plans?</li> <li>c. Systematically tracks the implementation of these strategies and plans?</li> </ol>
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<b>Action</b>	<p><b>The company has systems in place to ensure its operations conduct and disclose regular assessments of the impacts of their activities on women, youth and children.</b></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"> <li>a. Conduct and disclose regular assessment of the impacts of their activities on women?</li> <li>b. Conduct and disclose regular assessment of the impacts of their activities on youth?</li> <li>c. Conduct and disclose regular assessment of the impacts of their activities on children?</li> </ol>
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## **D.05 Land Use**

Mining operations typically involve the transformation of large areas of land. Often, mines are proposed and developed in areas with long-established land uses such as agriculture, harvesting of traditional plants and animals, cultural activities, recreation, conservation or human settlements. This can create conflict, for example, when companies are granted mineral concessions without the relevant individuals or communities agreeing to and receiving suitable alternative land or shared-land-use opportunities.

In some countries, communities may not have written proof of ownership of lands that they have collectively used for centuries in accordance with customary laws. As highlighted in the UN Voluntary Guidelines on Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), these community lands and resources are particularly vulnerable to being taken by government, companies or private individuals without adequate safeguards for those who depend on them for food security, livelihoods or cultural survival.

Some conflicts related to land use may be avoided or minimised if inclusive, collaborative processes between mining companies, governments and local communities are undertaken to develop regional land-use or landscape-scale planning strategies. Such processes can explore options such as multiple and sequential land-use development to manage competing land-uses, promote environmental stewardship, and maximise economic and social benefits for present and future generations (See also F.01). Additionally, shared-land-use agreements

can be developed that provide access for mining development while supporting the ability of individuals and communities to use and enjoy their land to the greatest extent possible, free from unreasonable interference or disturbance.

Companies can also seek to minimise the physical footprint of their mining operations, and relinquish the parts of their mining areas no longer needed. This helps to avoid situations where companies hold unnecessarily large tracts of land. A number of producing countries have regulations regarding the regular relinquishment of leased areas throughout the life of the mining operations. By holding a minimal physical footprint and avoiding severe adverse impacts on land use and land accessibility, companies can mitigate the risks of land-related conflicts and better support local communities' land-use and land-based livelihoods.

<b>Action</b>	<p><b>The company has systems in place to ensure its operations identify, assess, avoid, and mitigate their adverse impacts on land use and access to land by affected communities.</b></p> <p><i>Can your company demonstrate at the corporate level that it:</i></p> <ol style="list-style-type: none"><li>a. Has systems in place to ensure its operations identify and assess their adverse impacts on land use and access to land by affected communities?</li><li>b. Has systems in place to ensure its operations develop strategies and plans to minimise and mitigate these adverse impacts?</li><li>c. Systematically tracks the implementation of these strategies and plans?</li></ol>
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## D.06 Community Health

Mining activities may impact community health in various ways. Adverse health effects may result from being exposed to mine-related noise, contaminants in air, water or soil, or from the degradation of ecosystem services. Non-environmental factors such as traffic, the influx of migrant workers, or a mine's security arrangements can also influence the physical and mental health and wellbeing of communities, both directly and indirectly.

The particular community health risks associated with a mining operation will vary depending on the mine's location and the minerals being mined. For example, mining projects in conflict-affected areas may place additional stress on scarce local resources and exacerbate existing health problems. Also, there may be vulnerable groups of women, men, children, elderly, Indigenous Peoples, and persons with disabilities who are more susceptible to certain health risks. Children, due to their progressive and incomplete development, hand-to-mouth behaviour, time spent outdoors and other factors, are particularly vulnerable to air pollutants and mining-related contaminants that may be found in soil or water.

Companies can collaborate with affected communities and other stakeholders such as local governments and public health professionals to assess the potential impacts of mining operations on community health, and develop strategies and plans to

manage and monitor identified risks and impacts. As community health is often linked with environmental and social issues, community health assessments may be integrated with the environmental and social impact assessments (See F.01 and D.04). Stakeholder engagement in community health assessments is essential to the effectiveness of these projects, as it improves the quality of the health data, and helps to identify acceptable ways of monitoring and mitigating community health impacts.

Community health monitoring looks at the positive and negative impacts of the mining operation on community health, and can provide early warning of health problems at the community level. Monitoring includes both health outcomes, such as incidence of malnutrition, diseases or mental ill health, and health determinants, such as levels of air, water and soil pollution. Mining companies are increasingly partnering with communities and other stakeholders in the monitoring of community health, as well as environmental and social commitments more generally.

Although community health is primarily the responsibility of producing country governments, mining companies may, where appropriate, take a proactive supporting role in developing opportunities that complement governmental capacity, especially in developing countries where local health services may be lacking. Mining company investment in community health initiatives, such as the development of infrastructure to provide potable water and sanitation or health campaigns related to high-burden diseases, can create significant positive health benefits. Care must be taken, however, to ensure that any critical community health initiatives or infrastructure supported by the company align with community needs and priorities, and can be sustained after mine closure (See C.03).

Health risks and impacts, both for mine workers and for those living near a mining project, are amongst the most important issues for local communities, and warrant close attention by mining companies. A proactive approach to minimising health impacts and maximising community health and wellbeing can improve the financial and social performance of the company; lower the risk of community-led liability and litigation; increase access to international funding; reduce absenteeism and health care costs for worker and local communities; and improve general worker morale and community relations.

#### Action

**The company has systems in place to ensure its operations identify, assess, avoid, and mitigate their impacts on community health.**

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

- a. Has systems in place to ensure its operations conduct and disclose regular assessments of their impacts on community health?
- b. Has systems in place to ensure its operations develop strategies and plans to address these impacts?
- c. Systematically tracks the implementation of these strategies and plans?

## **D.07 Gender Equity**

The mining industry creates employment and economic opportunities and benefits; however, men are more likely than women to be directly employed by mining operations, and are also more likely to benefit from social programmes and projects supported by mining companies.

Women, on the other hand, often bear a disproportionate share of social, economic, and environmental risks related to mining. For example, research indicates that sexual harassment, abuse and sexual exploitation involving girls and women are widespread in some mining areas. Furthermore, in some societies women are responsible for providing food and water for their households so any loss of access to fertile land and clean water due to mining activities can disproportionately impact them. Yet women and girls are often underrepresented in mining stakeholder engagement processes (See D.03), which skews the information received by the company regarding community interests and priorities. Within community decision-making processes, women also may be marginalised, giving them less of a voice in how impacts are addressed or resources from mining are allocated.

An emerging practice is the use of gender impact assessments to identify the impacts of mining projects on women and men (and the relationship between them), to develop strategies to mitigate the impacts, and to promote women's empowerment and participation. For example, gender impact assessments can help identify barriers to the participation of women and girls in project-related assessments, monitoring and decision-making. Through capacity building such as training in negotiating, communications or data collection and monitoring, women can gain skills that are transferable to other life situations. Gender impact assessments can also help to differentiate between age-related differences in impacts, needs and interests, by including girls and boys in the assessment.

Increased attention is also being paid to enhancing the participation of women in decision-making related to mining projects. This movement has resulted from the widespread acknowledgement amongst development agencies and companies that the empowerment of women to participate in decisions and planning of social programmes leads to better mitigation of adverse impacts, as well as poverty reduction and more broad-based and sustainable development outcomes.

In recent years, the financial sector has highlighted the issue of gender inequity in the mining sector, and as a result some companies have begun to create more opportunities for women at the corporate board and senior management levels (See B.02) and in core mining activities. However, numerous challenges persist for women mine workers, such as sexual harassment, lack of acceptance by male co-workers, physical constraints, lack of gender-appropriate facilities or protective equipment, balancing family responsibilities and shift work, and others. These challenges increase if gender intersects with other factors such as discrimination due to socio-economic status, age, race, origin or sexual orientation. More gender-aware

approaches to risk management, including the involvement of women workers in occupational health and safety risk assessments, and greater effort to create family-friendly working conditions is needed to protect women workers and increase their participation in mining.

Mining companies that take a gender-equity approach to employment, occupational health and safety, impact assessment, and engagement are likely to experience increased productivity at mining operations, stronger relationships with communities, and a decreased potential for conflicts, while women and their communities will experience greater economic opportunities and development benefits. Combined, these factors can result in financial and reputational benefits to the companies

### Effectiveness

**The company tracks, reviews and acts to improve its performance on managing any impacts of its activities on women.**

*Can your company demonstrate that it systematically:*

- a. Tracks and discloses data, against targets and across successive time periods, on its performance on managing the impacts of its activities on women, including mine-site disaggregated data on the regular implementation of gender impact assessment processes?
- b. Audits and/or reviews the effectiveness of its measures taken to manage the impacts of its activities on women?
- c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to manage the impacts of its activities on women?

## **D.08 Indigenous People**

There is no single authoritative definition of Indigenous Peoples, though self-identification is one of the primary criteria for identifying Indigenous Peoples. It is generally understood, as well, that the cultures and livelihoods of many Indigenous Peoples are strongly tied to ancestral territories and surrounding natural resources. As a result, extractives industries like mining, which often dramatically transform and degrade lands and resources, create a high potential for negative, and possibly devastating impacts on the lives, livelihoods and cultures of Indigenous Peoples. Increasingly, Indigenous Peoples have been subject to attacks and acts of violence, criminalization and threats in the context of large-scale projects including those of extractive industries.

It is now a globally recognized norm that corporations should respect the human rights of those affected by their activities (See D.01). Indigenous Peoples have both individual and collective rights that may be affected by the development of a large-scale mining project, including rights to participation, self-determination, and pursuit of their own priorities for developing natural resources, to rights related to property, culture, religion and health.

Many mining companies recognise the need to respect the rights and interests of Indigenous Peoples, including their right to Free, Prior and Informed Consent (See D.09). It is commonly agreed that relationships between companies and Indigenous Peoples should be founded on respect, meaningful engagement and mutual benefit. Leading companies will develop their own guidelines and policies to manage their activities and engagement with Indigenous Peoples, tailored to the specific context and indigenous-led processes of the indigenous groups potentially affected by their operations and activities.

Companies seeking to operate within or near indigenous territories can start building trust with Indigenous Peoples by initiating early and inclusive engagement (See D.03) with all potentially affected groups, such as tribes, nations and communities of Indigenous Peoples. Any group of Indigenous Peoples potentially affected by a mining project or its associated facilities, such as tailings dams, roads or smelters, should participate in the identification and assessment of the potential impacts of mining-related activities on their rights and interests. To ensure the integrity and long-term reliability of engagement, it is advisable for companies to take deliberate steps to correct any significant imbalances of power and address barriers to meaningful participation. Proper engagement with Indigenous Peoples will also be based on full access to information in culturally appropriate languages, about potential environmental and social impacts, technical and financial viability of proposed projects, and potential financial benefits.

If projects proceed, responsible mining requires that companies work with Indigenous Peoples to develop acceptable mitigation strategies, and involve them in long-term project monitoring. Companies can also demonstrate respect for



Indigenous Peoples by making an effort to understand and protect the cultural heritage values that are integral to their beliefs, languages, customs, practices and identities, and ensuring that all company personnel understand their responsibility to respect Indigenous Peoples' rights and cultural heritage.

Indigenous Peoples worldwide continue to resist extractive industry projects for understandable social, cultural and environmental reasons. Companies that have a track record of working with Indigenous Peoples in a respectful manner, acknowledging the legitimacy of their concerns, are less likely to encounter conflict, delays and difficulties in negotiating and finalising agreements. This includes acceptance of the wishes of Indigenous Peoples where there is no agreement to be found.

<b>Action</b>	<p><b>Where applicable, the company has systems in place to ensure its operations design and implement, through inclusive participation, strategies and plans to respect the rights, interests, and needs of Indigenous Peoples potentially affected by its operations, in line with the UN Declaration on the Rights of Indigenous Peoples.</b></p> <p><i>Where applicable, 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"><li>Identify, through inclusive participation, all Indigenous Peoples potentially affected by current and planned mines and associated facilities?</li><li>Identify, through inclusive participation, the rights, interests and needs of these Indigenous Peoples?</li><li>Develop and implement strategies and plans, through inclusive participation, to respect the rights, interests and needs of these Indigenous Peoples?</li></ol>
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<b>Effectiveness</b>	<p><b>Where applicable, the company tracks, reviews and acts to improve its performance on respecting the rights and aspirations of Indigenous Peoples and avoiding adverse impacts on their livelihoods and heritage.</b></p> <p><i>Where applicable, can your company demonstrate that it systematically:</i></p> <ol style="list-style-type: none"><li>Tracks and discloses data, across successive time periods, on its performance on respecting the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage?</li><li>Audits and/or reviews, against a baseline and/or target(s), the effectiveness of its measures taken to respect the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage?</li><li>Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve its performance on respecting the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage?</li></ol>
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## **D.09 Free, Prior and Informed Consent**

Free, Prior and Informed Consent (FPIC) is the principle of informing and consulting in advance of projects or major developments that may impact peoples' rights and interests, and providing the opportunity for collective approval or rejection of the development in a manner that is free from intimidation or coercion and prior to any activity taking place. FPIC is an internationally recognised right of Indigenous Peoples and a mechanism to ensure that their rights and interests will be respected.

The encroachment of mining into Indigenous Peoples' territories can generate social conflict and create significant and often irreversible impacts on their cultural values, rights, resources and livelihoods. FPIC provides an important means of balancing the power relationship between Indigenous Peoples and external actors (e.g., governments or corporations), and enables Indigenous Peoples to determine their development priorities, and more effectively negotiate community-level benefits and safeguards. It is now understood that when proposed exploration or mining projects may affect Indigenous Peoples or their territories, that companies promoting the project acquire the consent of the Indigenous Peoples concerned, even if not required to do so by producing country law (See C.02).

FPIC from Indigenous Peoples has become a pre-requisite for companies to obtain financing through the International Finance Corporation and other international finance institutions. Demonstration of FPIC is also a requirement for companies participating in various voluntary certification programmes established for extractive industry sectors such as forestry, palm oil and mining.

Although FPIC was originally established as a right applying only to Indigenous Peoples, FPIC principles are starting to be applied more broadly. Since 2009, regional and international bodies have begun to apply the general principles of FPIC to non-indigenous communities and constituencies, and various civil society organisations and industry associations have expressed support for a broader application of FPIC. For example, in 2013 the members of the International Council on Mining and Metals released a position statement that said, "Where both indigenous and non-Indigenous Peoples are likely to be significantly impacted, members may choose to extend the commitments embodied in this position statement [including FPIC] to non-indigenous people." Also, in 2016 the UN Committee on the Elimination of Discrimination against Women recommended that governments obtain FPIC from rural women prior to the approval of projects affecting rural lands and resources.

Taking a proactive stance on FPIC signals to producing country governments, civil society and the investment community that a company respects the rights and interests of Indigenous Peoples and affected communities and is strongly committed to building positive relationships with them. By incorporating FPIC into company policies and implementing FPIC systematically throughout the lifecycle of their

operations, mining companies can reduce conflict, legal and reputational risks; establish positive relationships with communities and a social license to operate.

#### Commitment

**The company commits to respect the right of Indigenous Peoples to Free, Prior and Informed Consent (FPIC), and to support the extension of the principle of FPIC to other project-affected groups.**

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

- a. Formalised its commitment, that is endorsed by senior management, to respect the rights of Indigenous Peoples to FPIC and to support the extension the principle of FPIC to other project-affected groups?
- 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?

### D.10 Displacement and Resettlement

Both the acquisition of land by mining companies and environmental damage caused by mining may lead to the physical relocation (displacement) of people, or economic displacement as a result of lost access to subsistence or income-generating lands or resources. If done poorly, physical and economic displacement can violate human rights and threaten the social, cultural, economic, physical and psychological health and wellbeing of individuals and communities.

Although any displacement of peoples can have devastating effects, mining-induced displacement and resettlement (MIDR) often present even greater challenges. Mining projects are often located in remote areas where governments are weak or unstable, people lack political power, land tenure is insecure, and alternative land or livelihood opportunities are limited. Studies of MIDR consistently reveal high levels of impoverishment among displaced people. Both the communities receiving displaced people and those being resettled face high risks of conflict, human rights violations, poverty and social instability.

In some countries proposed large-scale mines overlap with areas traditionally used for artisanal or small-scale mining (ASM). MIDR can have particularly severe impacts on ASM communities: it can be difficult to relocate ASM miners because opportunities to practice their traditional livelihoods are not easy to find; and because many ASM miners do not have formally recognised rights to land and minerals they may not be compensated through resettlement processes for loss of livelihood.

Given the high potential for impoverishment and conflict, mining-induced displacement and resettlement should only take place under exceptional circumstances, and with sufficient safeguards to ensure that the living standards and livelihoods of affected peoples are maintained or improved. However, while avoiding resettlement is often viewed as a top priority for companies and lending institutions, it should also be recognised that avoidance may not always provide the most positive

outcomes for communities, given for example the considerable health and safety risks often borne by communities located in the immediate vicinity of mining operations.

Some of the critical safeguards related to resettlement include: prioritising provision of land over cash compensation; basing all compensation on full replacement costs; providing a choice of options for adequate housing with security of tenure regardless of whether legal title to land and assets was previously held; restoring or improving livelihoods; and enabling displaced persons to share in a project's benefits.

Importantly, responsible mining requires that those likely to be adversely affected by resettlement be allowed to participate in all processes and decision-making related to resettlement, including: the evaluation of project alternatives; the assessment of impacts; planning of mitigation measures; implementation of resettlement programmes; and resettlement monitoring and evaluation. In order to ensure effective participation, engagement should be inclusive of women, youth, vulnerable groups including artisanal miners if relevant, and communities receiving displaced persons; and affected communities should be provided with free legal and technical assistance. Additionally, respect for human rights requires that grievance mechanisms be in place to enable affected peoples to raise concerns and seek appropriate remedy.

It is advisable for mining companies to devote time and resources to adequately plan resettlement programmes; and to carry out monitoring and external evaluation of resettlement outcomes with the participation of affected communities to ensure that they are making good on their commitments to improve livelihoods and standards of living. Failure to deliver positive outcomes for displaced and resettled communities creates high risks for companies including increased conflicts, reputational damage, higher operating costs, and reduced access to land.

<b>Action</b>	<p><b>Where applicable, the company has systems in place to ensure its operations identify, assess, avoid, and mitigate the potential impacts of the involuntary physical and/or economic displacement of project-affected people.</b></p> <p><i>Where applicable, 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"> <li>a. Assess the potential impacts of the involuntary physical and/or economic displacement of project-affected people?</li> <li>b. Develop strategies and plans to avoid, minimise and mitigate negative impacts?</li> <li>c. Involve project-affected people in the assessment of impacts and in the development of strategies to manage these impacts?</li> </ol>
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<b>Effectiveness</b>	<p><b>Where applicable, the company tracks, reviews and acts to improve its performance on ensuring that livelihoods are improved or restored following any involuntary resettlement.</b></p> <p><i>Can your company demonstrate that it systematically:</i></p> <ol style="list-style-type: none"> <li>a. Tracks and discloses data, against targets and across successive time periods, on its performance on ensuring that livelihoods are improved or restored following any involuntary resettlement?</li> <li>b. Audits and/or reviews the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored?</li> <li>c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored?</li> </ol>
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## **D.11 Artisanal and Small-Scale Mining**

Artisanal and small-scale mining (ASM) has been historically present in many countries, and is a traditional source of permanent or seasonal livelihood for vast numbers of people. ASM is labour intensive; tends to exploit surface deposits that may not be viable for large-scale mining (LSM); is often associated with lower investment and lower levels of mechanisation, and lower standards of health and safety, and can have a significant impact on the environment.

ASM activities are sometimes viewed negatively by governments, civil society and others due to issues such as child labour and forced labour (See E.02), the potential for ASM revenues to finance illegal activities or conflict, environmental pollution, or social disruption. In some situations, conflicts arise between ASM and LSM companies; in other situations tensions may exist between ASM miners and local communities, especially if ASM is new to the area or there are community resources at risk from the ASM operations.

Artisanal and small-scale mining, however, is a poverty-alleviating activity, and can be critically important for communities and local economies when there are few other viable livelihood alternatives.

Worldwide, an estimated 40 million people are directly engaged in ASM, including children and women. Some 150 million people are estimated to be indirectly dependent on ASM. Despite the fact that artisanal mining can be risky, labour-intensive work, both the number of commodities being mined and the number of ASM workers continues to grow.

The risks of conflict and violent interactions between ASM and large-scale mining operations can have several impacts. ASM can create reputational and investment risks and undermine the LSM company's social licence to operate by creating environmental and public health problems, clashing with mine security forces, and disputing rights to land and ownership of the resources. These risks, in turn, may threaten the viability of the LSM company's current and future projects

Consequently, LSM companies and others are seeking to find ways to improve and manage the relationship between ASM and LSM in mutually beneficial terms, and to enhance the potential for the ASM sector to become a catalyst for local economic growth.

The variability of the ASM sector prevents a one-size-fits-all solution, but there are some promising efforts that may be strategically applied by LSM companies, depending on a given mining context. For example, engagement with ASM miners and communities during the earliest stages of mining development and throughout the project lifecycle can help to defuse tensions between the two sectors. In some cases, to promote trust and effective participation by all parties it may be helpful to use a facilitator, or to agree on rules of engagement.

It may also be appropriate under certain circumstances for large-scale mining companies to: engage with governments to help forward policies that will benefit the ASM sector and support ASM-LSM relations; work to promote a strong legal and regulatory ASM framework; help ASM to get formalised; share a portion of the LSM mining leases with ASM; purchase mined ore from ASM miners; provide technical assistance to ASM miners; employ ASM miners as subcontractors; promote livelihood diversification; or support access of ASM miners and communities to basic services. The basis for any engagement or supporting activities would need to involve the inclusive identification and mapping of ASM individuals and communities in and around the mine sites.

ASM has the potential to offer sustainable livelihoods for small-scale producers. By focusing on relationship building, and providing real benefits through targeted initiatives, large-scale mining companies can reduce conflicts with ASM, and improve the livelihoods of ASM workers and local communities. All of these activities will provide reputational benefits for companies, help to reduce their risk, and contribute to the goal of ending poverty (SDG1) by creating stronger local economies and a more stable and attractive investment climate in producing countries.

<b>Action</b>	<p><b>Where applicable, the company has systems in place to ensure its operations facilitate engagement with artisanal and small-scale mining (ASM) communities and activities in and around their operations.</b></p> <p><i>Where applicable, can your company demonstrate at the corporate level that it:</i></p> <ol style="list-style-type: none"> <li>a. Has systems in place to ensure its operations identify and map stakeholders operating in ASM activities around its operations?</li> <li>b. Has systems in place to ensure its operations develop strategies and plans to engage with identified stakeholders, including through the establishment of engagement agreements where appropriate?</li> <li>c. Systematically tracks the implementation of these strategies and plans?</li> </ol>
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<b>Action</b>	<p><b>Where applicable, the company has systems in place to ensure its operations develop opportunities to support technical assistance programmes and/or alternative livelihood programmes for ASM miners in and around their operations.</b></p> <p><i>Where applicable, can your company demonstrate at the corporate that it has systems in place to ensure its operations:</i></p> <ol style="list-style-type: none"> <li>a. Assess the need for, and feasibility of, providing technical and/or livelihood support to ASM miners?</li> <li>b. Develop strategies and plans according to these assessments?</li> <li>c. Engage with ASM miners in these needs assessments and in the development of any strategies and plans?</li> </ol>
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## **D.12 Grievance and Remedy**

Large-scale mining has the potential to profoundly affect the lives, properties, environmental resources and rights of nearby community members and other stakeholders. It is inevitable, therefore, that questions, concerns and complaints will be triggered by either real or perceived impacts of a company's mining operations.

Operational-level (or project-level) grievance mechanisms are formal processes that enable individuals or groups to raise concerns and seek remedy for negative effects from a company's activities. Ideally, these mechanisms provide a process for receiving, evaluating and addressing minor concerns as well as more significant issues, including the infringement of human rights. When there are allegations of serious or widespread human rights abuses, however, operational-level grievance mechanisms may not be the most appropriate means of providing remedy as this may require the involvement of state entities. Furthermore, utilising an operational-level grievance mechanism should not preclude complainants from accessing judicial or other non-judicial grievance mechanisms.

Operational-level grievance mechanisms can be an effective means of providing remedy for a grievance if the mechanisms meet the effectiveness criteria outlined in the UN Guiding Principles on Business and Human Rights. These criteria include being legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue with stakeholders. In addition, grievance mechanisms should be designed to ensure that grievances are addressed in a timely manner. In case of traumatizing incidences

such as sexual assault, the mechanism and remedy process should be designed to avoid the risk of re-traumatisation of the complainant.

Remedies offered through a grievance mechanism should counteract or provide relief from any harms that have occurred. The appropriate remedy, however, may vary depending on the circumstance. For example, remedy may take the form of apologies, restitution, rehabilitation, financial or non-financial compensation, or measures to prevent recurrence of the harmful act.

Operational-level grievance mechanisms will not serve their purpose if they are not used. By engaging with a diversity of affected stakeholder groups in the design, accessibility and performance of the grievance mechanism, mining companies can help ensure that it meets stakeholders' needs and is culturally appropriate, thereby increasing the likelihood that stakeholders will trust and use the process, and that remedies are effective and appropriate.

Complainants want to be sure that they are taken seriously, and treated fairly. Mining companies can promote confidence in the grievance process by involving stakeholders in the monitoring and verification of compliance with commitments made through the grievance mechanism, and creating ample opportunities for stakeholders to provide feedback on its effectiveness. Public reporting on grievances, such as the types of issues being raised, the number of complaints and the proportion resolved to the complainant's satisfaction, can help demonstrate that the company treats local concerns seriously.

There is an increasing global expectation that companies will implement operational-level grievance mechanisms. When they are effective, such mechanisms enable companies to identify minor concerns before they escalate into unmanageable conflicts; help avoid protests or opposition to mining projects and costly legal battles; and increase access to project finance. Information generated through the operational-level grievance mechanisms can also facilitate learning that can support better management of relations with communities over the long term.

### Effectiveness

#### **The company tracks, reviews and acts to improve the effectiveness of its grievance mechanisms for communities.**

*Can your company demonstrate that it systematically:*

- a. Tracks and discloses data, against targets and across successive time periods, on the functioning and uptake of its grievance mechanisms for communities, including number and nature of complaints and actions taken in response?
- b. Audits and/or reviews, based on complainants' perspective, the effectiveness of its grievance mechanisms for communities?
- c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its grievance mechanisms for communities?



## Scoring frameworks

### D.01.1 The company commits to respect human rights, in accordance with the UN Guiding Principles on Business and Human Rights. (/6.00)

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

*a. Formalised its commitment, that is endorsed by senior management, to respect human rights in accordance with the UNGPs?*

- 2 points** The company commits to respect human rights in accordance with the UNGPs in a formal document which covers all of the company's activities and is endorsed by senior management.
- 1 point** The company commits to respect human rights in accordance with the UNGPs 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 respect human rights in accordance with the UNGPs 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 respect human rights in a formal document which is endorsed by senior management, but it does not explicitly refer to the UNGPs.
- 0.5 point** The company refers to the need for respecting human rights, 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 respecting human rights  
OR  
The company conducts company-wide awareness and/or training programmes and/or workshops related to its commitment to respecting human rights, and there is detailed evidence of the specific financial and/or staffing resources committed
- 1 point** The company conducts company-wide awareness and/or training programmes and/or workshops related to respecting human rights, but there is limited information on the actual financial and/or staffing resources committed  
OR  
The company has company-wide operational-level teams responsible for coordinating efforts on respecting human rights, but only on some limited aspects of human rights OR  
The company allocates financial and staffing resources to implement this commitment (awareness/training programmes/workshops and/or responsible 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 evidence of awareness and/or training programmes and/or workshops related to respecting human rights, but does not provide any additional information  
OR  
The company mentions the existence of programmes to implement the human rights policy  
OR  
The company mentions that human rights impact assessment have been conducted  
OR  
The company provides evidence qualifying for a score of 2 or 1, but the company scored 0.5 under a).

**D.01.2 The company has systems in place, in accordance with the UN Guiding Principles on Business and Human Rights, to carry out regular human rights due diligence across all its operations, to assess and address human rights risks. (/6.00)**

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

*a. Has systems in place to ensure its operations identify and assess salient impacts of their activities on human rights?*

- 2 points** The company has company-wide systems in place to identify and assess salient impacts of its activities on human rights, 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 identify and assess salient impacts of their activities on human rights, but not on company-wide basis OR  
The company provides a description of its approach to identify and assess salient impacts of its activities on human rights, but there is no evidence of company-wide systems in place  
OR  
The company provides evidence of multiple cases of operations having identified and assessed salient impacts of its activities on human rights, but there is no evidence of company-wide systems in place.
- 0.5 point** The company states that it identifies and assesses salient impacts of its activities on human rights, but does not provide any additional information  
OR  
The company provides evidence of only one or two cases of operations having identified and assessed salient impacts of its activities on human rights  
OR  
The company provides evidence of systems in place to ensure its operations identify and assess salient impacts of their activities on human rights but it relates only to supply chain.

*b. Has systems in place to ensure its operations develop strategies and plans to prevent, mitigate and account for how they address these identified impacts?*

**2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to prevent, mitigate and account for how it addresses these identified impact, 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 prevent, mitigate and account for how they address these identified impacts, 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 prevent, mitigate and account for how it addresses these identified impact, 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 prevent, mitigate and account for how they address these identified impacts, 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 strategies and plans to prevent, mitigate and account for how they address these identified impacts.

*c. Systematically tracks the implementation of these strategies and plans?*

**2 points** The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans.

**1 point** The company has company-wide systems in place to systematically track the implementation of these strategies and plans throughout its operations, but there is limited evidence of the actual use of such systems

OR

The company discloses recent data (within the assessment period) from the tracking of the implementation of strategies and plans at several of its operations, but there is no evidence of a systematic, company-wide approach.

**0.5 point** The company states that it systematically tracks the implementation of these strategies and plans throughout its operations, but there is no information disclosed beyond a narrative description.

### **D.01.3 The company tracks, reviews and acts to improve its performance on preventing and remedying adverse impacts on human rights associated with its areas of operations. (/6.00)**

**Can your company demonstrate that it systematically:**

*a. Tracks and discloses data, across successive time periods, on its performance on preventing and remedying adverse impacts on human-rights across its mine sites, including number and nature of cases and actions taken in response?*

**2 points** The company discloses recent company-wide data (within the assessment period) on its performance on preventing and remedying adverse impacts on human-rights across its mine sites, including number and nature of cases and actions taken in response, and the data is disclosed across successive time periods.

**1 point** The company discloses recent data (within the assessment period) on its performance on preventing and remedying adverse impacts on human-rights across its mine sites, including at least number and nature of cases, but the data is not disclosed across successive time periods

OR

The company discloses recent company-wide data (within the assessment period) on its performance on preventing and remedying adverse impacts on human-rights across its mine sites, including at least number and nature of cases, and the data is disclosed across successive time periods but does not cover all of the company's activities.

**0.5 point** The company discloses recent data (within the assessment period) on its performance on preventing and remedying adverse impacts on human-rights across its mine sites, including number or nature of cases only

OR

The company discloses recent data (within the assessment period) on employees having received human rights training

*b. Audits and/or reviews the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights?*

- 2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess its performance on preventing and remedying adverse impacts on human rights associated with its areas of operations.
- 1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess its performance on preventing and remedying adverse impacts on human rights associated with its areas of operations.
- 0.5 point** The company states that regular reviews and/or audits of its performance on preventing and remedying adverse impacts on human rights associated with its areas of 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.

*c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights?*

- 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 the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights.
- 1 point** The company states that it integrates the recommendations from these audits and/or reviews to continuously improve the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights, but there is limited information on the integration of recommendations.
- 0.5 point** The company states that it integrates the recommendations from audits and/or reviews to continuously improve the effectiveness of its measures taken to prevent and remedy adverse impacts on human rights, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations.

#### **D.01.4 The company commits to respect the rights and protections accorded to human rights, land, environmental, and labour rights defenders in its areas of operations (/6.00)**

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

*a. Formalised its commitment, that is endorsed by senior management, to respect the rights and protections accorded to human rights, land, environmental, and labour rights defenders in its areas of operations?*

**2 points** The company commits to respect the rights and protections accorded to human rights defenders in its areas of operations in a formal document which covers all of the company's activities and is endorsed by senior management.

**1 point** The company commits to respect the rights and protections accorded to human rights defenders in its areas of operations 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 respect the rights and protections accorded to human rights defenders in its areas of operations 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 respect some the rights and protections accorded to human rights defenders in its areas of operations in a formal document which is endorsed by senior management.

**0.5 point** The company refers to the need for respecting the rights and protections accorded to human rights defenders in its areas of operations, 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 to implement this commitment

OR

- The company conducts company-wide awareness and/or training programmes and/ or workshops related to its commitment and there is detailed evidence of the specific financial and/or staffing resources committed.
- 1 point** The company conducts company-wide awareness and/or training programmes and/or workshops related to respecting the rights and protections accorded to human rights, land, environmental, and labour rights defenders, but there is limited information on the actual financial and/or staffing resources committed OR  
The company has company-wide operational-level teams coordinating efforts on respecting the rights and protections accorded to human rights, land, environmental, and labour rights defenders, but only on some limited aspects  
OR  
The company allocates financial and/or staffing resources to implement this commitment (awareness/training programmes/workshops and/or responsible 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 mentions to conduct awareness and/or training programmes and/or workshops related to respecting the rights and protections accorded to human rights, land, environmental, and labour rights defenders, 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).

**D.02.1 The company has systems in place to ensure its operations manage security personnel and private security forces through vetting, investigation, reporting and appropriate disciplinary action, in line with the Voluntary Principles on Security and Human Rights. (/6.00)**

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

*a. Review the background of security personnel and private security forces they intend to employ, particularly with regard to the use of excessive force, in order to not employ individuals credibly implicated in human rights abuses to provide security services?*

- 2 points** The company has company-wide systems in place to ensure its operations review the background of security personnel and private security forces they intend to employ, particularly with regard to the use of excessive force 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 review the background of security personnel and private security forces they intend to employ, but there is no evidence that these systems address the use of excessive force  
OR  
The company has company-wide systems in place to ensure its operations review the background of security personnel and private security forces they intend to employ, particularly with regard to the use of excessive force but there is limited evidence of the scope and content of these systems  
OR  
The company has company-wide systems in place to ensure its operations review the background of security personnel and private security forces they intend to employ, particularly with regard to the use of excessive force and there is detailed evidence of the scope and content of these systems, but it does not cover all of company's activities.
- 0.5 point** The company states that it ensures its operations review the background of security personnel and private security forces they intend to employ, but there is no information beyond statement  
OR  
The company provides evidence of only one or two cases of operations having reviewed the background of security personnel and private security forces they intend to employ.



*b. Require from security personnel and private security forces, including through contractual provisions in agreements with security providers, to investigate and report all cases where physical force is used, and to provide medical aid to injured persons, including to offenders?*

**2 points** The company has systems in place to ensure its operations require from security personnel and private security forces, including through contractual provisions in agreements with security providers, to investigate and report all cases where physical force is used, and to provide medical aid to injured persons, including to offenders, 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 require from security personnel and private security forces, including through contractual provisions in agreements with security providers, to investigate and report all cases where physical force is used, and to provide medical aid to injured persons, including to offenders, and there is detailed evidence of the scope and content of these systems, but it does not cover all of company's activities.

OR

The company has systems in place to ensure its operations require from security personnel and private security forces to investigate and report all cases where physical force is used and/or to provide medical aid to injured persons, but there is limited evidence of the scope and content of these systems.

**0.5 point** The company states it ensures its operations require from security personnel and private security forces to investigate and report all cases where physical force is used and/or to provide medical aid to injured persons, but there is no information beyond statement.

OR

The company provides evidence of only one or two cases of operations having required from security personnel and private security forces to investigate and report all cases where physical force is used and/or to provide medical aid to injured persons.

*c. Conduct investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces, and take appropriate disciplinary action?*

**2 points** The company has systems in place to ensure its operations conduct investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces, and take appropriate disciplinary action, 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 conduct investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces, and take appropriate disciplinary action, but there is detailed evidence of the scope and content of these systems

OR

The company has systems in place to ensure its operations conduct investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces, and take appropriate disciplinary action, and there is detailed evidence of the scope and content of these systems, but it does cover all of the company's activities.

**0.5 point** The company states it ensures its operations conduct investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces, and take appropriate disciplinary action, but there is no information beyond statement.

OR

The company provides evidence of only one or two cases of operations having conducted investigations of all unlawful or abusive behaviour towards workers or affected communities related to its security personnel and private security forces.

## **D.02.2 The company tracks, reviews and acts to improve its performance on supporting education and training of its security personnel, private, and public security forces, to prevent human rights abuses, in line with the Voluntary Principles on Security and Human Rights. (/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 supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses?*

**2 points** The company discloses recent company-wide data (within the assessment period) on its performance on supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses.

**1 point** The company discloses recent company-wide data (within the assessment period) on its performance on supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses, 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 supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses, and the data is compared across successive time periods but not against targets

OR

The company discloses company-wide data on its performance on supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses, 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 supporting education and training of its security personnel, private and public security forces, to prevent human rights abuses, 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 supporting education and training of its security personnel, private and/or public security forces, to prevent human rights abuses, 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 supporting education and training of its security personnel, private and/or public security forces, to prevent human rights abuses, 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 supporting education and training of its security personnel, private and/or public security forces, to prevent human rights abuses, 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 supporting education and training of its security personnel, private and/or public security forces, to prevent human rights abuses, 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 the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses?*

**2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses.

**1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses.

**0.5 point** The company states that regular reviews and/or audits of the effectiveness of its measures taken to support education and training of its security personnel, private and/or public security forces, to prevent human rights abuses, 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 audi

*c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses?*

- 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 the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses.
- 1 point** The company states that it integrates the recommendations from these audits and/or reviews to continuously improve the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses, 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 the effectiveness of its measures taken to support education and training of its security personnel, private and public security forces, to prevent human rights abuses, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations.

**D.02.3 Where applicable, the company has systems in place to ensure its operations carry out enhanced due diligence to identify, assess, avoid, and mitigate risks for workers and communities specifically associated with the operations' presence in any conflict-affected and high-risk areas (CAHRAs), in line with the Voluntary Principles on Security and Human Rights (/6.00)**

**Where applicable, can your company demonstrate at the corporate level that it:**

*a. Has systems in place to ensure its operations identify and assess risks for workers and communities specifically associated with their presence in any conflict-affected and high-risk areas?*

- 2 points** The company has company-wide systems in place to ensure its operations identify and assess risks for workers and communities associated with their presence in conflict-affected and high-risk areas, in line with the Voluntary Principles on Security and Human Rights.
- 1 point** The company has company-wide systems in place to ensure its operations identify and assess risks for workers or communities associated with their presence in conflict-affected and high-risk areas, 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 identify and assess risks for workers and communities associated with their presence in conflict-affected and high-risk areas, and there is detailed evidence of the scope and/or 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 communities associated with their presence in conflict-affected or high-risk areas, 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 communities associated with their presence in conflict-affected or high-risk areas.

*b. Has systems in place to ensure its operations develop strategies and plans to address these identified risks?*

- 2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to address these identified risks, 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 these identified risks, 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 these identified risks, 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 develop strategies and plans to address these identified risks, 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 strategies and plans to address these identified risks.

*c. Systematically tracks the implementation of these strategies and plans?*

- 2 points The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans
- 1 point The company has systems in place to systematically track the implementation of these strategies and plans throughout its operations, but not on a company-wide basis.
- 0.5 point The company states that it systematically tracks the implementation of these strategies and plans throughout its operations, but there is no information disclosed beyond a narrative description  
OR  
The company provides evidence of a broader tracking system covering the implementation of strategies and plans but not of a dedicated tracking system

**D.03.1 The company has systems in place to ensure its operations take specific measures to enable the participation of women, youth and persons with disabilities in discussions and decision-making on matters that may impact them. (/6.00)**

take specific measures to enable the participation of:

*a. Women in discussions and decision-making on matters that may impact them?*

- 2 points The company has company-wide systems in place to ensure its operations take specific measures to enable the participation of women in discussions and/or decision-making , 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 take specific measures to enable the participation of women in discussions and/or decision-making, but there is limited evidence of the scope and content of these systems  
OR  
The company has systems in place to ensure its operations take specific measures to enable the participation of vulnerable groups in discussions and/or decision-making, but there is no direct reference to women  
OR  
The company has systems in place to ensure its operations take specific measures to enable the participation of women in discussions and decision-making, but the systems only relate to community social investments.
- 0.5 point The company provides evidence that some activities are conducted to develop mechanisms for women to participate in discussions or decision-making on matters that may impact them, but there is no evidence of a company-wide approaches or systems in place  
OR  
The company states that it provides opportunities for women to participate in discussions or decision-making on matters that may impact them, but does not provide any additional information  
OR  
The company has systems in place to ensure its operations engage with women, but systems are not specific enough regarding participation in discussions and/or decision-making

*b. Youth in discussions and decision-making on matters that may impact them?*

- 2 points** The company has company-wide systems in place to ensure its operations take specific measures to enable the participation of youth in discussions and/or decision-making 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 take specific measures to enable the participation of youth in discussions and/or decision-making, but there is limited evidence of the scope and content of these systems  
OR  
The company has systems in place to ensure its operations take specific measures to enable the participation of vulnerable groups in discussions and/or decision-making, but there is no direct reference to youth  
OR  
The company has systems in place to ensure its operations take specific measures to enable the participation of youth in discussions and decision-making, but the systems only relate to community social investments.
- 0.5 point** The company provides evidence that some activities are conducted to develop mechanisms for youth to participate in discussions or decision-making on matters that may impact them, but there is no evidence of company-wide approaches or systems in place  
OR  
The company states that it provides opportunities for the youth to participate in discussions or decision-making on matters that may impact them, but does not provide any additional information  
OR  
The company has systems in place to ensure its operations engage with youth, but the systems are not specific enough regarding participation in discussions and/or decision-making.

*c. Persons with disabilities in discussions and decision-making on matters that may impact them?*

- 2 points** The company has company-wide systems in place to ensure its operations take specific measures to enable the participation of persons with disabilities in discussions and/or decision-making 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 take specific measures to enable the participation of persons with disabilities in discussions and/or decision-making, but there is limited evidence of the scope and content of these systems  
OR  
The company has systems in place to ensure its operations take specific measures to enable the participation of vulnerable groups in discussions and/or decision-making, but there is no direct reference to persons with disabilities  
OR  
The company has systems in place to ensure its operations take specific measures to enable the participation of persons with disabilities in discussions and decision-making, but the systems only relates to community social investments.
- 0.5 point** The company provides evidence that some activities are conducted to develop mechanisms for persons with disabilities to participate in discussions or decision-making on matters that may impact them, but there is no evidence company-wide approaches or systems in place  
OR  
The company states that it provides opportunities for persons with disabilities to participate in discussions or decision-making on matters that may impact them, but does not provide any additional information  
OR  
The company has systems in place to ensure its operation engage with persons with disabilities, but the system is not specific enough regarding participation in discussions and/or decision-making

### **D.03.2 The company tracks, reviews and acts to improve the quality of its relationships with affected communities. (/6.00)**

**Can your company demonstrate that it systematically:**

*a. Tracks and discloses data, against targets and across successive time periods, on the quality of its relationships with affected communities?*

**2 points** The company discloses recent company-wide data (within the assessment period) on the quality of its relationships with affected communities and the data is compared across successive time periods.

**1 point** The company discloses recent company-wide data (within the assessment period) on the quality of its relationships with affected communities, but the data is not compared across successive time periods

OR

The company discloses recent data (within the assessment period) on the quality of its relationships with affected communities, and the data is compared across successive time periods, but does not cover all of the company's activities.

**0.5 point** The company states that it tracks data on the quality of its relationships with affected communities, but does not disclose it

OR

The company provides evidence of only one or two cases of operations having tracked and disclosed data on the quality of their relationships with affected communities

*b. Audits and/or reviews the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities?*

**2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities.

**1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities.

**0.5 point** The company states that regular reviews and/or audits of the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities 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.

*c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures to build and maintain trust-based relationships with affected communities?*

**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 the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities.

**1 point** The company states that it integrates the recommendations from these audits and/ or reviews to continuously improve the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities, 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 the effectiveness of its measures taken to build and maintain trust-based relationships with affected communities but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations.

### **D.04.1 The company has systems in place to ensure its operations encourage local entrepreneurship and support local business development, including for women. (/6.00)**

#### **Can your company demonstrate at the corporate level that it:**

*a. Has systems in place to ensure its operations develop strategies and plans to develop local entrepreneurship and businesses?*

**2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to develop local entrepreneurship and businesses, 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 strategies and plans to develop local entrepreneurship and businesses, but there is limited evidence of the scope and/or content of these systems

OR

The company provides evidence of multiple cases of operations having developed strategies and plans to develop local entrepreneurship and businesses, but there is no evidence of company-wide systems in place

OR

The company has systems in place to ensure its operations develop strategies and plans to develop local entrepreneurship and businesses, 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 evidence that some activities are conducted to develop local entrepreneurship and businesses, but there is no evidence of company-wide approaches or systems in place

OR

The company states that it has systems in place to ensure its operations develop local entrepreneurship and businesses, but there is no information about the scope, content and actual implementation of these systems

*b. Has systems in place to ensure its operations actively include women in these strategies and plans?*

**2 points** The company has company-wide systems in place to ensure its operations actively include women in these strategies and 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 actively include women in these strategies and 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 actively include women in these strategies and 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 has systems in place to ensure its operations actively include women in these strategies and plans, but there is no information about the scope, actual content and implementation of these systems

OR

The company provides evidence of only one or two operations having actively included women in these strategies and plans.

*c. Systematically tracks the implementation of these strategies and plans?*

**2 points** The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans

**1 point** The company has systems in place to systematically track the implementation of these strategies and plans throughout its operations, but there is limited evidence of the actual use of such systems

OR

The company discloses actual recent data from the tracking of the implementation of strategies and plans at several of its operations, but there is no evidence of a systematic, company-wide approach.

- 0.5 point The company states that it systematically tracks the implementation of these strategies and plans throughout its operations, but there is no information disclosed beyond a narrative description  
OR  
The company provides evidence of only one or two isolated cases of operations where the implementation of these strategies and plans is tracked

#### **D.04.2 The company has systems in place to ensure its operations develop local procurement opportunities, including for women. (/6.00)**

##### **Can your company demonstrate at the corporate level that it:**

*a. Has systems in place to ensure its operations develop strategies and plans to develop local procurement opportunities?*

- 2 points The company has company-wide systems in place to ensure its operations develop strategies and plans to develop local procurement opportunities, 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 develop local procurement opportunities, 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 develop local procurement opportunities, 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 evidence that some activities are conducted to develop local procurement opportunities, but there is no evidence of company-wide approaches or systems in place  
OR  
The company states that it has systems in place to ensure its operations develop local procurement opportunities, but there is no information about the scope, content and actual implementation of these systems.

*b. Has systems in place to ensure its operations actively include women in these strategies and plans?*

- 2 points The company has company-wide systems in place to ensure its operations actively include women in these strategies and 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 actively include women in these strategies and 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 actively include women in these strategies and 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 has systems in place to ensure its operations actively include women in these strategies and plans, 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 actively included women in these strategies and plans.



c. *Systematically tracks the implementation of these strategies and plans?*

2 points

The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans

1 point

The company has systems in place to systematically track the implementation of these strategies and plans throughout its operations, but there is limited evidence of the actual use of such systems

OR

The company discloses recent data (within the assessment period) from the tracking of the implementation of strategies and plans at several of its operations, but there is no evidence of a systematic, company-wide approach

OR

The company requires to conduct such tracking in a formal standard (disclosed), but there is limited evidence of the actual use of such systems.

0.5 point

The company states that it systematically tracks the implementation of these strategies and plans throughout its operations, but there is no information disclosed beyond a narrative description

OR

The company provides evidence of only one or two isolated cases of operations where the implementation of these strategies and plans is tracked.

### **D.04.3 The company has systems in place to ensure its operations conduct and disclose regular assessments of the impacts of their activities on women, youth and children. (/6.00)**

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

a. *Conduct and disclose regular assessment of the impacts of their activities on women?*

2 points

The company has company-wide systems in place to ensure its operations conduct and disclose regular assessments of the impact of their activities on women, 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 conduct and disclose assessments of the impact of their activities on women, but there is no evidence showing that this is done on a regular basis.

0.5 point

The company provides evidence of only one or two cases of operations having conducted an assessment of the impact of their activities on women, but there is no evidence of company-wide systems in place

OR

The company mentions that it conducts assessments of the impact of their activities on women, but does not provide any additional information

b. *Conduct and disclose regular assessment of the impacts of their activities on youth?*

2 points

The company has company-wide systems in place to ensure its operations conduct and disclose regular assessments of the impact of their activities on youth, 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 conduct and disclose assessments of the impact of their activities on youth, but there is no evidence this is done on a regular basis.

0.5 point The company provides evidence of only one or two cases of operations having conducted assessments of the impact of their activities on youth, but there is no evidence of a company-wide system in place

OR

The company mentions that it conducts assessments of the impact of their activities on youth, but does not provide any additional information.

*c. Conduct and disclose regular assessment of the impacts of their activities on children?*

2 points The company has company-wide systems in place to ensure its operations conduct and disclose regular assessments of the impact of their activities on children, 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 conduct and disclose assessments of the impact of their activities on children, but there is no evidence this is done on a regular basis.

0.5 point The company provides evidence of only one or two cases of operations having conducted assessments of the impact of their activities on children, but there is no evidence of company-wide systems in place

OR

The company mentions that it conducts assessment of the impact of their activities on children, but does not provide any additional information.



**D.05.1 The company has systems in place to ensure its operations identify, assess, avoid, and mitigate their adverse impacts on land use and access to land by affected communities. (/6.00)**

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

*a. Has systems in place to ensure its operations identify and assess their adverse impacts on land use and access to land by affected communities?*

**2 points** The company has company-wide systems in place to ensure its operations identify and assess their adverse impacts on land use and access to land by affected communities, 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 identify and assess their adverse impacts on land use and access to land by 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 identify and assess their adverse impacts on land use and access to land by affected communities, 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 to ensure its operations identify and assess their adverse impacts on land use and access to land by 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 cases of operations having identified and assessed their adverse impacts on land use and access to land by affected communities

*b. Has systems in place to ensure its operations develop strategies and plans to minimise and mitigate these adverse impacts?*

**2 points** The company has company-wide systems to ensure its operations develop strategies and plans to minimise and mitigate these adverse impacts, 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 strategies and plans to minimise and mitigate these adverse impacts, but there is limited evidence of the scope and/or content of these systems

OR

The company has systems to ensure its operations develop strategies and plans to minimise and mitigate these adverse impacts, 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 develop strategies and plans to minimise and mitigate these adverse impacts, 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 strategies and plans to minimise and mitigate these adverse impacts.

*c. Systematically tracks the implementation of these strategies and plans?*

**2 points** The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans.

**1 point** The company has systems in place to systematically track the implementation of these strategies and plans throughout its operations, but there is limited evidence of the actual use of such systems

OR

The company discloses actual recent data from the tracking of the implementation of strategies and plans at several of its operations, but there is no evidence of a systematic, company-wide approach.

0.5 point

The company states that it systematically tracks the implementation of these strategies and plans throughout its operations, but there is no information disclosed beyond a narrative description

OR

The company discloses actual recent data from the tracking of the implementation of strategies and plans, but it covers only some limited aspects of their adverse impacts on land use and access to land by affected communities.

### **D.06.1 The company has systems in place to ensure its operations identify, assess, avoid, and mitigate their impacts on community health. (/6.00)**

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

*a. Has systems in place to ensure its operations conduct and disclose regular assessments of their impacts on community health?*

2 points

The company has company-wide systems in place to ensure its operations conduct and disclose regular assessments of community health impacts, 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 conduct assessments of community health impacts, but not to ensure their disclosure

OR

The company has community health-related company-wide systems in place, but they do not specifically address the assessment of impacts

OR

The company has company-wide systems in place to ensure its operations conduct and disclose regular assessments of community health impacts, 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 evidence of only one or two cases of operations having assessed their impacts community health

OR

The company provides evidence of action taken to understand community health impacts, but there is no evidence of company-wide approaches or systems in place to conduct and disclose regular assessments.

OR

The company provides a limited narrative description of systems to ensure its operations conduct assessments of their impacts on community health, but there is no information about the scope, content and actual implementation of these systems

OR

The company mentions the existence of programmes, but these address only community safety.

*b. Has systems in place to ensure its operations develop strategies and plans to address these impacts?*

2 points

The company has company-wide systems in place to ensure its operations develop strategies and plans to address community health impacts, 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 these impacts, 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 community health impacts, 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 mentions activities to address community health impacts, but does not disclose information regarding the scope and content of these activities and there is no evidence of company-wide systems in place.  
OR  
The company has systems in place to ensure its operations conduct environmental impact assessments (or similar) which include a brief mention of public/community health.

*c. Systematically tracks the implementation of these strategies and plans?*

- 2 points** The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans.  
**1 point** The company has systems in place to track the implementation of strategies and plans to address community health impacts, but does not disclose results relating to this tracking.  
**0.5 point** n/a

**D.07.1 The company tracks, reviews and acts to improve its performance on managing any impacts of its activities on women. (/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 managing the impacts of its activities on women, including mine-site-disaggregated data on the regular implementation of gender impact assessment processes?*

- 2 points** The company discloses recent company-wide data (within the assessment period) on its performance on managing the impacts of its activities on women, including mine-site-disaggregated data on the regular implementation of gender impact assessment processes, and the data is compared across successive time periods.  
**1 point** The company discloses recent company-wide data (within the assessment period) on its performance on managing the impacts of its activities on women, but the data is not compared across successive time periods.  
OR  
The company discloses recent data (within the assessment period) on its performance on managing the impacts of its activities on women and the data is compared across successive time periods, but does not cover all of the company's activities.  
**0.5 point** The company discloses recent data (within the assessment period) on its performance on managing the impacts of its activities on women, but the data is not compared across successive time periods and does not cover all of the company's activities

*b. Audits and/or reviews the effectiveness of its measures taken to manage the impacts of its activities on women?*

- 2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to manage the impacts of its activities on women.  
**1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to manage the impacts of its activities on women.  
**0.5 point** The company states that regular reviews and/or audits of the effectiveness of its measures taken to manage the impacts of its activities on women 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

*c. Takes responsive action, on the basis of the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to manage the impacts of its activities on women?*

- 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 the effectiveness of its measures taken to manage the impacts of its activities on women.

- 1 point The company states that it integrates the recommendations from these audits and/or reviews to continuously improve the effectiveness of its measures taken to manage the impacts of its activities on women, 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 the effectiveness of its measures taken to manage the impacts of its activities on women, but there is no information on reviews and/ or audits that were actually conducted, and thus no information on the integration of recommendations.

**D.08.1 Where applicable, the company has systems in place to ensure its operations design and implement, through inclusive participation, strategies and plans to respect the rights, interests, and needs of Indigenous Peoples potentially affected by its operations, in line with the UN Declaration on the Rights of Indigenous Peoples. (/6.00)**

**Where applicable, can your company demonstrate at the corporate level that it has systems in place to ensure its operations:**

*a. Identify, through inclusive participation, all Indigenous Peoples potentially affected by current and planned mines and associated facilities?*

- 2 points The company has company-wide systems in place to ensure its operations identify, through inclusive participation, all Indigenous Peoples groups potentially affected by current and planned mines and associated facilities, 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 all Indigenous Peoples groups potentially affected by current and planned mines and associated facilities, but there is no evidence that these systems ensure inclusive participation  
OR  
The company has systems in place to ensure its operations identify, through inclusive participation, all Indigenous Peoples groups potentially affected by current and planned mines and associated facilities, but not on a company-wide basis.
- 0.5 point The company provides evidence of activities or outcomes related to identifying Indigenous Peoples groups potentially affected by current and planned mines and associated facilities, but there is no evidence of systems in place  
OR  
The company has systems in place to ensure its operations have a planned approach to engage with Indigenous Peoples groups, but these do not clearly relate to the identification of all affected groups.

*b. Identify, through inclusive participation, the rights, interests and needs of these Indigenous Peoples?*

- 2 points The company has company-wide systems in place to ensure its operations identify, through inclusive participation, the rights, interests and needs of these Indigenous Peoples groups, 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 conduct social and environmental impact assessments in the context of identified Indigenous Peoples groups, 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 identify the rights, interests and needs of these Indigenous Peoples, but these do not clearly ensure inclusive participation.
- 0.5 point The company states that it respects the rights, interests and needs of these Indigenous Peoples groups, but there is no evidence of company-wide systems in place to identify, through inclusive participation, the rights, interests and needs of these Indigenous Peoples  
OR

The company shows evidence of activities or outcomes related to identifying Indigenous Peoples' rights, interests and needs, but there is no evidence of company-wide systems in place.

*c. Develop and implement strategies and plans, through inclusive participation, to respect the rights, interests and needs of these Indigenous Peoples?*

**2 points** The company has company-wide systems in place to ensure its operations develop and implement strategies and plans, through inclusive participation, to address to respect the rights, interests and needs of these Indigenous Peoples groups, and there is detailed evidence of the scope and content of these systems.

**1 point** The company provides evidence of some of its operations having developed and implemented strategies and plans to address respect the rights, interests and needs of these Indigenous Peoples groups, but there is no evidence of a company-wide system  
OR

The company has systems in place to ensure its operations develop agreements with Indigenous Peoples groups, but these systems do not clearly include the development and implementation of strategies and plans to respect the rights, interests and needs of these Indigenous Peoples groups.

**0.5 point** The company shows evidence of limited activities relating to its operations developing and implementing strategies and plans to to respect the rights, interests and needs of these Indigenous Peoples groups, but there is no evidence of a company-wide system.  
OR

The company states that it develops and implements strategies and plans to respect the rights, interests and needs of these Indigenous Peoples, but there is no information disclosed beyond a narrative description.

#### **D.08.2 Where applicable, the company tracks, reviews and acts to improve its performance on respecting the rights and aspirations of Indigenous Peoples and avoiding adverse impacts on their livelihoods and heritage. (/6.00)**

**Where applicable, can your company demonstrate that it systematically:**

*a. Tracks and discloses data, across successive time periods, on its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage?*

**2 points** The company discloses recent company-wide data (within the assessment period) on its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage, and the data is compared against targets and across successive time periods.

**1 point** The company discloses recent data on its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage, but the data is not comprehensive enough (e.g. not on a company-wide basis, not on planned mines, not across successive time periods, does not address all relevant rights, aspirations, impacts,...)  
OR

The company discloses recent data (within the assessment period), but only on one dimension, and discloses a full agreement/plan.

**0.5 point** The company states that it tracks its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, and/or on avoiding adverse impacts on their livelihoods and heritage, but does not disclose any data  
OR

The company provides evidence of only one or two cases of operations having tracked and disclosed data on their performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, and/or on avoiding adverse impacts on their livelihoods and heritage  
OR

OR

The company discloses recent data (within the assessment period), but the data is not compared across successive time periods and covers only one dimension.

*b. Audits and/or reviews, against a baseline and/or target(s), the effectiveness of its measures taken to respect the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage?*

**2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to respect the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage.

**1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to respect the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage.

**0.5 point** The company states that regular reviews and/or audits of the effectiveness of its measures taken to respect the rights and aspirations of all Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage 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.

*c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage?*

**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 its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage.

**1 point** The company states that it integrates the recommendations from these audits and/or reviews to continuously improve its performance on respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage, 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 respecting the rights and aspirations of any Indigenous Peoples potentially affected by current and planned mines and associated facilities, as well as on avoiding adverse impacts on their livelihoods and heritage, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations



**D.09.1 The company commits to respect the right of Indigenous Peoples to Free, Prior and Informed Consent (FPIC), and to support the extension of the principle of FPIC to other project-affected groups. (/6.00)**

**Can you company demonstrate at the corporate level that it has:**

*a. Formalised its commitment, that is endorsed by senior management, to respect the rights of Indigenous Peoples to FPIC and to support the extension the principle of FPIC to other project-affected groups?*

**2 points**

The company commits to respect the rights of Indigenous Peoples to FPIC and to support the extension the principle of FPIC to other project-affected groups in a formal document which covers all of the company's activities and is endorsed by senior management.

**1 point**

The company commits to respect the rights of Indigenous Peoples to FPIC and to support the extension of the principle of FPIC to other project-affected groups 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 respect the rights of Indigenous Peoples to FPIC and to support the extension of the principle of FPIC to other project-affected groups 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 respect the rights of Indigenous Peoples to FPIC in a formal document which is endorsed by senior management but the commitment covers only some limited aspects or does not mention the extension of the principle of FPIC to other project-affected groups.

OR

The company commits to 'work to obtain the consent of Indigenous Peoples' in a formal document and this commitment extends to other project-affected groups

**0.5 point**

The company refers to the need for respecting the rights of Indigenous Peoples to FPIC, but does not make a clear commitment in a formal document which is endorsed by senior management

OR

The company commits to 'work to obtain the consent of Indigenous Peoples' in a formal document.

OR

The company refers to meeting the requirement as expressed in ICMM Position Statement on IPs and/or IFC PS 7

*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 respecting the rights of Indigenous Peoples to FPIC and supporting the extension the principle of FPIC to other project-affected groups

OR

The company conducts company-wide awareness and/or training programmes and/ or workshops related to its commitment and there is detailed evidence of the specific financial and/or staffing resources committed.

1 point

The company conducts company-wide awareness and/or training programmes and/ or workshops related to the rights of Indigenous Peoples to FPIC, but there is limited information on the actual financial and/or staffing resources committed

OR

The company has company-wide operational-level teams responsible for coordinating efforts on respecting the rights of Indigenous Peoples to FPIC but only on some limited aspects of the rights of Indigenous Peoples to FPIC or does not mention the extension the principle of FPIC to other project-affected groups.

OR

The company allocates resources to implement this commitment (awareness/training programmes/workshops and/or responsible 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 discloses limited information on company-wide awareness/training programmes/workshops or operational-level teams related to FPIC

OR

The company provides evidence qualifying for a score of 2 or 1, but the company scored 0.5 under a).



**D.10.1 Where applicable, the company has systems in place to ensure its operations identify, assess, avoid, and mitigate the potential impacts of the involuntary physical and/or economic displacement of project-affected people. (/6.00)**

**Where applicable, can your company demonstrate at the corporate level that it has systems in place to ensure its operations:**

*a. Assess the potential impacts of the involuntary physical and/or economic displacement of project-affected people?*

- 2 points** The company has company-wide systems in place to ensure its operations assess the potential impacts of involuntary physical and/or economic displacement of project-affected people, 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 assess the potential impacts of involuntary physical and/or economic displacement of project-affected people, 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 assess the potential impacts of involuntary physical and/or economic displacement of project-affected people, 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 assess the potential impacts of the involuntary physical and/or economic displacement of project-affected people, but there is no information about the scope, content and actual implementation of these systems  
OR  
The company provides evidence of limited activities relating to assessing the potential impacts of involuntary physical and/or economic displacement of project-affected people, but there is no evidence of company-wide approaches or systems in place.

*b. Develop strategies and plans to avoid, minimise and mitigate negative impacts?*

- 2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to avoid, minimise and mitigate negative impacts, 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 develop strategies and plans to avoid, minimise and mitigate negative impacts, and provides examples of application of these systems, but there is limited evidence of the scope and/or content of these systems
- 1 point** The company has systems in place to ensure its operations develop strategies and plans to avoid, minimise and mitigate negative impacts, but there is limited evidence of the scope and/or content of these systems  
OR  
The company provides evidence of multiple cases of operations having developed strategies and plans to avoid, minimise and mitigate negative impacts, but there is no evidence of company-wide systems in place  
OR  
The company has systems in place to ensure its operations develop strategies and plans to avoid, minimise and mitigate negative impacts, 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 avoid, minimise and mitigate negative impacts, but there is no information about the scope, content and actual implementation of these systems OR  
The company shows evidence of limited activities related to developing strategies and plans to avoid, minimise and mitigate negative impacts, but there is no evidence of company-wide systems in place.

*c. Involve project-affected people in the assessment of impacts and in the development of strategies to manage these impacts?*

- 2 points** The company has company-wide systems in place to ensure its operations involve project-affected people in the assessment of impacts and in the development of strategies to manage these, 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 involve project-affected people in resettlement activities, but does not specifically refer to involving project-affected people in the assessment of impacts and in the development of strategies to manage these  
OR  
The company provides evidence of multiple cases of operations having involved project-affected people in resettlement activities, but there is no evidence of company-wide systems in place.
- 0.5 point** The company has systems in place to ensure its operations involve project-affected people in the assessment of impacts and in the development of strategies to manage these, but there is no information about the scope, content and actual implementation of these systems.  
OR  
The company shows evidence of limited activities related to involving project-affected people in resettlement activities, but there is no evidence of company-wide systems in place OR  
The company mentions the existence of guidelines that provide guidance on engaging with people affected by the resettlement, but these are not disclosed and no/very limited details are provided.

**D.10.2 Where applicable, the company tracks, reviews and acts to improve its performance on ensuring that livelihoods are improved or restored following any involuntary resettlement. (/6.00)**

*performance on ensuring that livelihoods are improved or restored following any involuntary resettlement?*

- 2 points** The company discloses recent company-wide data (within the assessment period) on its performance on ensuring that livelihoods are improved or restored following any involuntary resettlement 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 ensuring that livelihoods are improved or restored following involuntary resettlements, 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 ensuring that livelihoods are improved or restored following involuntary resettlement and the data is compared across successive time periods but not disclosed against targets  
OR  
The company discloses company-wide data on its performance on ensuring that livelihoods are improved or restored following involuntary resettlement, and the data is disclosed against targets and compared 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 ensuring that livelihoods are improved or restored following any involuntary resettlement 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 ensuring that livelihoods are improved or restored following involuntary resettlements, but the data is not disclosed against targets and is not compared across successive time periods  
OR  
The company discloses recent data (within the assessment period) on its performance on ensuring that livelihoods are improved or restored following involuntary resettlements, 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 ensuring that livelihoods are improved or restored following involuntary resettlement and the data is compared across successive time periods but not disclosed against targets and does not cover all of the company's activities

OR

The company discloses data on its performance on ensuring that livelihoods are improved or restored following involuntary resettlement, and the data is disclosed against targets and compared 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 the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored?*

- 2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored.
- 1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored.
- 0.5 point** The company states that it mandates an identified internal or external body to conduct regular reviews and/or audits of the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored, but there is no information on reviews and/or audits that were actually conducted, beyond statement.

*c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored?*

- 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 the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored.
- 1 point** The company states that it integrates the recommendations from these audits and/or reviews to continuously improve the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored, 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 the effectiveness of its measures taken to manage involuntary resettlement in a manner that ensures that livelihoods are improved or restored, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations

**D.11.1 Where applicable, the company has systems in place to ensure its operations facilitate engagement with artisanal and small-scale mining (ASM) communities and activities in and around their operations. (/6.00)**

**Where applicable, can your company demonstrate at the corporate level that it:**

*a. Has systems in place to ensure its operations identify and map stakeholders operating in ASM activities around its operations?*

- 2 points** The company has company-wide systems in place to ensure its operations identify and map stakeholders operating in ASM activities around their operations, 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 identify and map stakeholders operating in ASM activities, 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 identify and map stakeholders operating in ASM activities around their operations, 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 evidence of activities related to identifying and mapping stakeholders operating in ASM activities, but there is no evidence of company-wide approaches or systems in place.

*b. Has systems in place to ensure its operations develop strategies and plans to engage with identified stakeholders, including through the establishment of engagement agreements where appropriate?*

2 points The company has company-wide systems in place to ensure its operations develop strategies and plans to engage with identified ASM stakeholders, 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 strategies and plans to engage with identified ASM stakeholders, 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 engage with identified ASM stakeholders, 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 shows evidence of activities related to developing strategies and plans to engage with identified ASM stakeholders, but there is no evidence of company-wide systems in place.

*c. Systematically tracks the implementation of these strategies and plans?*

2 points The company discloses recent data (within the assessment period) confirming the systematic, company-wide tracking of the implementation of these strategies and plans.

1 point The company has systems in place to track the implementation of strategies and plans to address engagement with ASM stakeholders, but does not disclose any data.

0.5 point The company shows evidence of limited activities related to tracking the implementation of strategies and plans to address engagement with ASM stakeholders, but there is no evidence of company-wide systems in place.

### **D.11.2 Where applicable, the company has systems in place to ensure its operations develop opportunities to support technical assistance programmes and/or alternative livelihood programmes for ASM miners in and around their operations. (/6.00)**

**Where applicable, can your company demonstrate at the corporate that it has systems in place to ensure its operations:**

*a. Assess the need for, and feasibility of, providing technical and/or livelihood support to ASM miners?*

2 points The company has company-wide systems in place to ensure its operations assess the need for, and feasibility of, providing technical and/or livelihoods support to ASM communities around their 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 assess the need for, and feasibility of, providing technical and/or livelihoods support to ASM communities around its operations, 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 assess the need for, and feasibility of, providing technical and/or livelihoods support to ASM communities around their operations, 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 evidence of activities related to assessing the need for, and feasibility of, providing technical and/or livelihoods support to ASM communities around its operations, but there is no evidence of company-wide approaches or systems in place.

*b. Develop strategies and plans according to these assessments?*

**2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans to support technical assistance programmes and/or alternative livelihood programmes for ASM miners according to its assessments, 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 support technical assistance programmes and/or alternative livelihood programmes for ASM miners according to its assessments, 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 support technical assistance programmes and/or alternative livelihood programmes for ASM miners according to its assessment, 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 develop strategies and plans to support technical assistance programmes and/or alternative livelihood programmes for ASM miners, but there is no information about the scope, content and actual implementation of these systems

OR

The company shows evidence of limited activities related to developing strategies and plans to support technical assistance programmes and/or alternative livelihood programmes for ASM miners, but there is no evidence of company-wide systems in place

*c. Engage with ASM miners in these needs assessments and in the development of any strategies and plans?*

**2 points** The company has company-wide systems in place to ensure its operations engage with ASM communities in its assessments of the need for, and feasibility of, providing technical and/or livelihoods support to ASM communities around its operations and/or in the development of any technical assistance and/or alternative livelihood opportunities, 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 ASM communities in its assessments of the need for, and feasibility of, providing technical and/or livelihoods support to ASM communities around its operations and/or in the development of any technical assistance and/or alternative livelihood opportunities, but there is limited evidence of the scope and/or content of these systems.

**0.5 point** The company shows evidence of limited engagement with ASM communities in its assessments of the need for, and feasibility of, providing technical and livelihoods support to ASM communities around its operations and/or in the development of any technical assistance and/or alternative livelihood opportunities, but there is no evidence of company-wide systems in place.

OR

The company states it engages with ASM, but the purpose of the engagement is not clearly specific to assessing needs and developing plans.

### **D.12.1 The company tracks, reviews and acts to improve the effectiveness of its grievance mechanisms for communities. (/6.00)**

**Can your company demonstrate that it systematically:**

*a. Tracks and discloses data, against targets and across successive time periods, on the functioning and uptake of its grievance mechanisms for communities, including number and nature of complaints and actions taken in response?*



- 2 points** The company discloses recent company-wide data (within the assessment period) including number, nature and actions taken in response, and the data is compared across successive time periods.  
OR  
The company reports that no community grievances were filed at all within the assessment period, and the data is compared across successive time periods.
- 1 point** The company discloses recent company-wide data (within the assessment period) on two of the three dimension only: number, nature or actions taken in response  
OR  
The company reports that no community grievances were filed at all within the assessment period, but the data is not compared across successive time periods  
OR  
The company discloses recent data (within the assessment period) including number, nature and actions taken in response and data is compared across successive time periods, but does not cover all of the company's activities  
OR  
The company reports that no community grievances were filed at all within the assessment period and the data is compared over successive time period, but does not cover all of the company's activities.
- 0.5 point** The company discloses recent data (within the assessment period) on one of the three dimensions only: number, nature or actions taken in response  
OR  
The company reports that no community grievances were filed within the assessment period on some dimensions only  
OR  
The company discloses recent data (within the assessment period) on two of the three dimension only: number, nature or actions taken in response, but the data does not cover all of the company's activities and is not compared across successive time periods  
OR  
The company reports that no community grievances were filed at all within the assessment period, but the data is not compared across successive time periods and does not cover all of the company's

*b. Audits and/or reviews, based on complainants' perspective, the effectiveness of its grievance mechanisms for communities?*

- 2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its grievance mechanisms for communities
- 1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess the effectiveness of its grievance mechanisms for communities  
OR  
The company formally requires to conduct regular reviews and/or audits, but discloses only high-level information on these audits/reviews.
- 0.5 point** The company states that regular reviews and/or audits of the effectiveness of its grievance mechanisms for communities 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.

*c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve the effectiveness of its grievance mechanisms for communities?*

- 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 the effectiveness of its measures taken to continuously improve the effectiveness of its grievance mechanisms for communities.
- 1 point** The company states that it integrates the recommendations from audits and/or reviews to seek to improve its performance on managing human rights issues, but there is limited information on the integration of recommendations.
- 0.5 point** The company states that it integrates the recommendations from audits and/or reviews to continuously improve its performance on managing human rights issues, but there is no

information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations.