

E Working Conditions

Large-scale mining operations can provide jobs for hundreds of workers (employees and contract workers). However, “decent work,” as defined by the International Labour Organization, encompasses more than a steady job. It involves work that delivers a fair income (See 05); safety, health and security in the workplace (See E.01); social protection for families; freedom for workers to express their concerns, organise and participate in the decisions that affect their lives (See E.04 and E.07); and equality of treatment and opportunity for advancement for all workers (See E.03).

Many of these concepts are entrenched as internationally recognised human rights in eight International Labour Organization core conventions that protect the fundamental rights of workers. Globally, however, hazardous working conditions persist, child labour or forced labour can be found at mines and in mining supply chains (See E.02), and discrimination and gender inequality remain a challenge at many mining operations.

Some mining companies recognise that respecting the rights of workers and promoting decent work are good for business and society. Mine productivity improves when workers are physically well, and when they feel respected and supported in the work that they do. Additionally, through the creation of safe and secure jobs and training opportunities mining companies can help to reduce poverty and provide equitable opportunities for economic and social development.

E.01 Occupational Health and Safety

Mining is an inherently hazardous occupation. According to the International Labour Organization, worldwide approximately 8% of fatal workplace accidents are related to mining, even though the mining sector comprises just 1% of the global workforce. Workplace injuries, noise-induced hearing loss, impacts on mental health, and occupational illnesses and diseases from exposure to chemicals, heat, radiation, metals and particulates are also significant in the mining sector.

As technologies change, some mining operations are becoming less dependent on physical labour and are moving to the use of high-tech equipment and machinery that can be operated from remote control rooms. While such working conditions may reduce the potential for fatal accidents and offer better air quality, personal protective equipment and technical safeguards, these work environments may come with their own set of issues, such as repetitive injuries and psychological stress.

Mining companies can address potential health and safety risks through an integrated occupational health and safety (OHS) management system that includes ongoing OHS risk assessment; development and updating of OHS risk management plans; health and safety trainings; workplace monitoring and worker health

surveillance; regular inspections; reporting; investigation of incidents; provision of appropriate and effective protective equipment at no cost to workers; and worker participation in health and safety management and decision-making.

Responsible mining requires that companies take a gender-equity approach to all aspects of their operations, including health and safety. More holistic approaches to risk management, including the involvement of women workers in occupational health and safety risk assessments and decision-making, can lead to increased protections for women workers. During the assessment of risks and development and implementation of OHS measures, particular attention should be paid to the risks and health and safety needs of women workers, including provision of gender-appropriate sanitation facilities and equipment, and measures to prevent sexual violence, intimidation and harassment in mines.

A strong corporate occupational health and safety culture recognises that workers must be both physically and mentally healthy for a safe and productive environment to flourish. When such a culture exists, mining projects experience higher worker productivity, and companies are better able to attract and retain personnel as well as investors. Additionally, by reducing fatalities, accidents and injuries a company will experience reputational benefits, and reduce costs associated with accident investigations, worker compensation payments, increased insurance premiums and litigation.

<p>Commitment</p>	<p>The company commits to ensure safe and healthy working conditions.</p> <p><i>Can your company demonstrate at the corporate level that it has:</i></p> <ol style="list-style-type: none"> Formalised its commitment, that is endorsed by senior management, to ensure safe and healthy working conditions? Assigned senior management or board-level responsibilities and accountability for carrying out this commitment? Committed financial and staffing resources to implement this commitment?
<p>Action</p>	<p>The company has systems in place to ensure its operations engage with worker representatives to collaboratively identify, assess, avoid, and mitigate health and safety risks to its workforce.</p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to ensure its operations engage with worker representatives to collaboratively:</i></p> <ol style="list-style-type: none"> Identify and assess health and safety risks to the workforce? Develop strategies and plans to avoid, minimise and mitigate these risks? Track the implementation of these strategies and plans?
<p>Action</p>	<p>The company has systems in place to ensure its operations protect women workers from harassment and violence.</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 prevent:</i></p> <ol style="list-style-type: none"> Intimidation and moral harassment of women workers? Sexual harassment of women workers? Gender-related violence against women workers?

Action

The company has systems in place to ensure its operations address the health and safety needs of women workers.

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

- a. Sanitation facilities (e.g.: toilets, showers)?
- b. Safety equipment (e.g.: PPE designed for women)?
- c. Health services (e.g.: for family planning and sexual health)?

Action

The company publicly discloses data on mining-related high potential incidents, serious injuries and fatalities among its workforce.

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

- a. Discloses the number of mining-related high potential incidents, serious injuries and fatalities among its workforce, across successive time periods?
- b. Discloses such information on a site-disaggregated basis?
- c. Confirms that its fatalities reporting includes fatalities of contract workers as well as employees?

E.02 Elimination of Forced Labour and Child Labour

Forced or compulsory labour is any work or service performed against a person's will under the threat of punishment, and includes debt bondage, human trafficking and other forms of modern slavery. It is estimated that more than 20 million people worldwide are trapped in jobs that they cannot leave, condemning them to lives of poverty or servitude.

Child labour is work that deprives children under the age of 18 of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Many child labourers never receive adequate education, and suffer lifelong physical or psychological damage. Despite recent gains in reducing child labour, there are still an estimated 168 million child labourers in the world today.

Both forced labour and child labour are violations of fundamental human rights. While there are some cases of forced labour alleged or found in large-scale mines, the vast majority of mining-related forced labour and child labour cases are associated with artisanal and small-scale mining (See D.11). However, under certain circumstances large-scale mining companies may be complicit in child labour or forced labour through the actions of others, including contractors, suppliers or businesses associated with its mines.

It is now a global expectation that in order to fulfil their responsibility to respect human rights, all mining companies must carry out due diligence to eliminate human rights abuses, including child labour and forced labour, in their own operations, and

seek to prevent these abuses in their supply chains. Due diligence involves taking proactive steps to identify, prevent, mitigate and account for how they address their impacts on human rights; as well as implement processes that enable the remediation of any adverse human rights impacts, they cause or to which they contribute (See D.01).

The elimination of child labour and forced labour remains a major challenge worldwide. However, progress in these areas has led to vast improvements in the quality of life of affected individuals and communities, and significant economic and social benefits in many countries. As awareness of the problems of child labour and forced labour in global value chains continues to grow, mining companies, like other businesses, are being pressured by investors, trade unions, non-governmental organisations and consumers to play a key role in the eradication of these practices.

When mining companies carry out the due diligence necessary to uncover and address issues of child or forced labour in their operations or global supply chains they may experience a competitive advantage, as they are likely to be viewed more positively by investors and, importantly, customers, who also face the same reputational risks of being associated with a company linked to human rights abuses. Companies that do not take child labour or forced labour seriously risk reputational damage, legal action, and targeted campaigns by civil society organisations or investors.

Action

The company has systems in place to identify, assess, avoid, and mitigate potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain.

Can your company demonstrate at the corporate level that it:

- a. Has systems in place to identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain?
- b. Has systems in place to develop strategies and plans to address these identified risks?
- c. Systematically tracks the implementation of these strategies and plans?

E.03 Non-Discrimination and Equal Opportunity

Both non-discrimination and equal opportunity are rooted in the principle that all employment decisions should be based solely on the ability of the individual to do the job in question, and not personal characteristics that are unrelated to the inherent requirements of the work, that benefit from employment is equitable, and that no workers experience discrimination from either management or fellow workers. The concepts of non-discrimination and equal opportunity are enshrined in numerous international instruments, including conventions of the United Nations and the International Labour Organization.

Discrimination in employment may include the exclusion or preferential treatment of a person based on age, race, ethnicity, gender, religion, political opinion, indigenous or social origin, disability, sexual orientation or other characteristics. Discrimination may affect access to employment, promotion or specific occupations; it may be reflected in the terms and conditions of employment, or may be experienced in the workplace via harassment or victimisation.

In the mining context, there may be vulnerable individuals, groups or communities that face a higher risk of being exposed to discrimination, such as women, Indigenous Peoples, persons belonging to ethnic or other minorities, migrant workers, or workers with HIV/AIDS or other diseases, with discrimination often the result of multiple compounding factors. Discrimination may be direct or indirect. For women workers in particular, numerous challenges persist, such as sexual harassment and lack of acceptance by male co-workers (See also E.01). Indirect problems include balancing family responsibilities and shift work. When workers, and in particular women, are discriminated against on multiple grounds (e.g. a woman from a minority group or an Indigenous woman), such intersectional discrimination contributes to make their position even more precarious.

Many countries have laws that prohibit employment-related discrimination, however, these laws are often weak or limited in scope. In some producing countries, certain cultural behaviours and attitudes may be deeply entrenched, which create challenges for combatting discrimination amongst workers.

Leading companies are increasingly going beyond legal requirements, and are making concerted efforts to eliminate discrimination and foster diversity and equal opportunity in the workplace. They are instituting clear and transparent recruitment practices that are based on qualifications and experience, not personal characteristics; developing and implementing anti-harassment policies; providing confidential grievance mechanisms (See E.07); creating family-friendly policies; providing cultural, religious, gender or other diversity trainings to supervisors and workers; training and recruiting under-represented groups; and implementing other initiatives.

Mining companies that adopt progressive anti-discrimination and equal opportunity approaches may derive a number of business advantages, including improved worker morale, a wider pool of talent from which to recruit, reduced exposure to legal challenges, and reputational benefits.

Action	<p>The company has systems in place to ensure its operations base their recruitment and employment practices on the principle of equal opportunity, in order to prevent all forms of discrimination in the workplace and promote workforce diversity.</p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:</i></p> <ol style="list-style-type: none">a. Take specific measures to reflect its non-discrimination policies in their terms and conditions?b. Take specific measures to implement trainings to raise awareness of discrimination among management staff and workers or take other actions aiming at preventing and addressing issues of discrimination in the workplace?c. Set targets regarding diversity and inclusivity in its recruitment and employment practices?
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E.04 Rights to Organise, Collective Bargaining and Freedom of Association

The freedom to associate, and the rights to organise and bargain collectively are fundamental worker and human rights that are now recognised in much of the world, although in some countries, mine workers and union representatives are still denied these rights, or are threatened or killed trying to exercise them; and physical violence and threats against workers are increasing in many countries.

The relevant instruments protecting these rights are the International Labour Organization's (ILO) core conventions of Freedom of Association and Protection of the Right to Organise, 1948 (No. 87) and the Right to Organise and Collective Bargaining, 1949 (No. 98). These conventions set forth the rights for both workers and employers to form or join organisations of their own choosing; protections for workers against acts of anti-union discrimination, such as dismissal for union membership or interference by companies in organising efforts (e.g., barring organisers from accessing sites); and for workers, typically organised as a union, to collectively negotiate their terms of employment with mine management.

The aim of collective bargaining is to form a joint, written agreement that governs the employment relationship, including wages and working time, and even issues such as job security, training, parental leave and equal opportunity. Collective bargaining provides a way to balance power and by so doing promote equity in the distribution of benefits from mining, and facilitate stability in employment relations.

Many mining companies have established policies and commitments to uphold the ILO core labour conventions, and increasingly they are placing the same

expectations on their contractors and suppliers. Some companies have signed international or global framework agreements with global union federations, demonstrating a stronger commitment to applying the same high labour standards globally within their subsidiaries and contractors, and along their global supply chain.

In many parts of the globe there is growing concern about the rise in income inequality, insecurity, social instability and slow economic growth. Collective bargaining can be a powerful tool for engagement between employers' and workers' organisations to address economic and social concerns, strengthen weak voices and reduce poverty and social disadvantage. This helps to contribute to an equitable and inclusive growth path.

For mining companies, in addition to fostering better relations with workers, collective bargaining agreements can lead to a more stable and predictable operating environment; and may enhance a company's performance and competitiveness. Companies that fail to respect workers' rights to freedom of association and collective bargaining may find themselves facing strikes, protests and campaigns from labour organisations and shareholders.

Action	<p>The company has systems in place to ensure its operations actively respect the rights of workers to organise, collective bargaining and freedom of association.</p> <p><i>Can your company demonstrate at the corporate level that it has systems in place to ensure its operations respect the rights of workers to:</i></p> <ol style="list-style-type: none">Organise, including by granting access to designated areas for labour organisers to meet with workers?Collective bargaining, including by developing formal collective bargaining agreements?Freedom of association, including by allowing union meetings on site?
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E.05 Living Wage

A living wage – one that enables workers and their families to afford a basic but decent lifestyle, live above the poverty level, and be able to participate in social and cultural life – is a human right. A number of countries and regional governments have laws requiring that living wages be paid to citizens, and numerous benchmarking or standard systems that promote responsible environmental and social practices have integrated the living wage concept into their requirements.

While the living wage concept is being more broadly recognised, issues such as the measurement and definition of a living wage are often used as an excuse for not paying a living wage. Although there is no single method for calculating living wage there are several methodologies that can be drawn upon. In some situations it is appropriate for mining companies to ensure that the overall benefit package for workers, including for example any housing provided, as well as wages, allow workers to maintain a decent living standard. The most important factor for mining companies is to ensure that relevant stakeholders, such as workers and community representatives, are involved in living wage discussions and assessments, so that companies ensure that wages are enough to provide for the needs of workers and their families in the specific local context.

Some mining companies are beginning to take leadership positions by incorporating living wage into company policies or commitments on wages paid to workers, contractors and suppliers.

Mining companies that proactively work to ensure that mine workers and contractors are paid a living wage are fulfilling their responsibility to respect the human rights of their workers. They can thus strengthen relationships with workers and increase their morale and productivity; and demonstrate to investors and stakeholders that they are fulfilling their responsibility to respect the human rights of their workers. Fair remuneration can also help decrease the potential for worker protests and their associated financial losses and reputational damage.

Effectiveness

The company tracks, reviews and acts to improve its performance on ensuring that its workers' wages meet or exceed verified living wage standards, or legal minimum wage, whichever is the highest.

Can your company demonstrate that it systematically:

- a. Tracks and discloses the levels of its workers' wages against living wage standards, or legal minimum wage, whichever is the highest?
- b. Audits and/or reviews the levels of wages against living wage standards, or legal minimum wage, whichever is the highest?
- c. Takes responsive action, based on the findings of these audits and/or reviews, to seek to improve its performance on ensuring that its workers' wages meet or exceed living wage standards, or legal minimum wage, whichever is the highest?

E.06 Automation and Technological Change

Stable employment relations generally result in stronger worker productivity and company efficiency, while job and income security can help producing countries achieve many of the UN Sustainable Development Goals (SDGs). However, there may be economic, technical, or organizational reasons why companies review and adjust the size of their workforces. A decrease in commodity prices, unfavourable market developments, a move towards automatization or changes in procedures due to technological innovations, or internal reorganization can lead to companies making significant reductions in their workforces.

Mass redundancies can have severe impacts not only on the workers themselves but also their communities, particularly in areas where a mining company is the main employer. Challenges arising from collective dismissals include sudden loss of income and psycho-social problems for large numbers of workers, mistrust and conflicts between affected communities and the company, low morale within the remaining workforce, and severe economic hardship for affected communities.

In cases of potential downsizing, companies can conduct analyses of alternatives to redundancy and negotiate these with workers' representatives, labour unions or other groups. Potential strategies to minimise and mitigate collective redundancies include cutting back on costs, reducing working hours, or reorienting and retraining workers for different positions within the company. In cases where mass redundancy is unavoidable, companies can show that the criteria they use to select workers for dismissal are objective, fair, and transparent. By communicating redundancy plans sufficiently in advance, companies can allow time for the joint examination of the plan's implications by the relevant government authorities, the workers and their representatives in order to mitigate adverse impacts to the greatest possible extent, and for the development of social plans with unions and other stakeholders, where appropriate. Other strategies to mitigate the impacts on the affected workforce include collaboration with local, regional or national governments, other industries or companies in order to seek opportunities for just transition for workers, including possible retraining and redeployment.

With innovative approaches to respond to unfavourable economic situations, mining companies can maintain a stable workforce. Where redundancies are unavoidable, companies can minimise and mitigate the impacts on workers by ensuring they respect any collective bargaining agreements and by actively consulting with worker representatives in the development of social plans. Managing collective redundancy in a responsible and fair manner will not only ease the harsh impacts on workers and their communities, but will also support better labour relations and reduce legal and reputational risks to companies, while contributing to the UN SDGs

Action

Where applicable, the company has systems in place to identify, assess, and address the implications of automation and technological change for workers.

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

- a. Has systems in place to ensure its operations identify and assess the implications of automation and technological change for workers?
- b. Has systems in place to ensure its operations develop strategies and plans to address these identified implications?
- c. Systematically tracks the implementation of these strategies and plans?

E.07 Worker Recourse

It is now an expectation that companies provide a means for stakeholders to file complaints and obtain remedy for business-related human rights abuses (See D.01 and D.12), which includes the infringement of labour rights. For example, the United Nations and others recommend that companies establish mechanisms that enable them to hear and address complaints raised by stakeholders, including workers. In the workplace context, grievance mechanisms should enable workers to file complaints related to labour (human) rights, working conditions or terms of employment, and to suggest workplace improvements.

Most mining companies have grievance mechanisms for workers, but they are not equally effective. As mentioned in D.12, operational-level grievance mechanisms will be most effective if they meet certain criteria such as being: legitimate, accessible to all workers, predictable, equitable, transparent, and rights-compatible. For example, in the labour context, an equitable mechanism could enable workers to have a colleague or representative from a workers' organisation present when they raise grievances, or provide workers with access to training or advice to facilitate their effective participation in the grievance process.

Grievance mechanisms should enable workers to file complaints anonymously or confidentiality, if requested, and without fear of punishment or retribution. Also, any operational-level grievance mechanism available to workers should not prevent them from seeking remedy through labour tribunals or other judicial or non-judicial mechanisms.

As with grievance mechanisms designed for other stakeholders, worker grievance mechanisms will be most useful and effective if they are designed to be appropriate to the local cultural setting and designed in a collaborative manner with workers or workers' representatives. Well-designed and implemented grievance processes can help foster a culture of trust and reduce conflicts with workers by providing a fair hearing and remedy process, so that workers are satisfied that their complaints have

been heard and taken seriously, even if the outcome is not viewed as entirely optimal.

If a mining company does not provide an effective means of actively engaging with workers in the remediation of impacts it cannot fully meet its responsibility to respect human rights. Failing to identify grievances early and to address them effectively can also have significant negative ramifications for mining operations. These range from low morale, reduced productivity, high turnover, absenteeism, and illness among its workforce, to strikes or violent actions against the company. The subsequent reputational damage can harm a company's ability to win future contracts or realise new investment opportunities.

Effectiveness

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

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 workers, 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 workers?
- 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 workers?

Scoring frameworks

E.01.1 The company commits to ensure safe and healthy working conditions.

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

a. *Formalised its commitment, that is endorsed by senior management, to ensure safe and healthy working conditions?*

- 2 points** The company commits to ensure safe and healthy working conditions in a formal document which covers all of the company's activities and is endorsed by senior management.
- 1 point** The company commits to ensure safe and healthy working conditions 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 ensure safe and healthy working conditions 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 ensure safe and healthy working conditions in a formal document which is endorsed by senior management, but the commitment does not cover all aspects of safe and healthy working conditions.
- 0.5 point** The company refers to the need for ensuring safe and healthy working conditions, 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 has a senior-management-level or Board level function responsible for carrying out this commitment 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 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 ensuring safe and healthy working conditions and there is detailed evidence of the specific financial and/or staffing resources committed
OR
The company conducts company-wide awareness and/or training programmes and/or workshops related to its commitment to ensure safe and healthy working conditions 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 safe and healthy working conditions, 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 ensuring safe and healthy working conditions but only on some limited aspects of safe and healthy working conditions
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 mentions to conduct awareness and/or training programmes and/or workshops related to its commitment to ensure safe and healthy working conditions, 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).

E.01.2 The company has systems in place to ensure its operations engage with worker representatives to collaboratively identify, assess, avoid, and mitigate health and safety risks to its workforce.

engage with worker representatives to collaboratively:

a. *Identify and assess health and safety risks to the workforce?*

- 2 points** The company has company-wide systems in place to ensure its operations engage with worker representatives to collaboratively identify and assess health and safety risks to the workforce, 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 worker representatives to collaboratively identify and assess health and safety risks to the workforce, but there is limited evidence of the scope and/or content of these systems
OR
The company has systems in place to ensure its operations engage with worker representatives to collaboratively identify and assess health and safety risks to the workforce, 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 engage with worker representatives to collaboratively identify and assess health and safety risks to the workforce, 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 engaged with worker representatives to collaboratively identify and assess health and safety risks to the workforce.
- b. *Develop strategies and plans to avoid, minimise and mitigate these risks?*
- 2 points** The company has company-wide systems in place to ensure its operations develop strategies and plans with worker representatives to avoid, minimise and mitigate these 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 with worker representatives to avoid, minimise and mitigate these 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 with worker representatives to avoid, minimise and mitigate these 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 with worker representatives to avoid, minimise and mitigate these 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 engaged with worker representatives to develop strategies and plans to avoid, minimise and mitigate these risks.

c. Track 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 tracks the implementation of these strategies and plan, but there is no information disclosed beyond a narrative description.

E.01.3 The company has systems in place to ensure its operations protect women workers from harassment and violence.

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

a. Intimidation and moral harassment of women workers?

- 2 points** The company has company-wide systems in place to ensure its operations prevent intimidation and moral harassment of women workers and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its operations prevent intimidation and moral harassment of women workers, but there is limited evidence of the scope and content of these systems.
- 0.5 point** The company provides evidence of activities relating to preventing intimidation and moral harassment of women workers, but there is no evidence of company-wide systems in place.

b. Sexual harassment of women workers?

- 2 points** The company has company-wide systems in place to ensure its operations prevent sexual harassment of women workers and there is detailed evidence of the scope and content of these systems.
- 1 point** The company has company-wide systems in place to ensure its operations prevent sexual harassment of women workers, but there is limited evidence of the scope and content of these systems.
- 0.5 point** The company provides evidence of activities related to preventing sexual harassment of women workers, but there is no evidence of company-wide systems in place.

c. Gender-related violence against women workers?

- 2 points The company has company-wide systems in place to ensure its operations prevent gender-related violence against women workers and there is detailed evidence of the scope and content of these systems
- 1 point The company has company-wide systems in place to ensure its operations prevent gender-related violence against women workers, but there is limited evidence of the scope and content of these systems.
- 0.5 point The company provides evidence of activities related to preventing gender-related violence against women workers, but there is no evidence of company-wide systems in place.

E.01.4 The company has systems in place to ensure its operations address the health and safety needs of women workers. (/6.00)

provide gender-appropriate:

a. Sanitation facilities (e.g.: toilets, showers)?

- 2 points The company has company-wide systems in place to provide gender-appropriate sanitation 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 provide gender-appropriate sanitation facilities, but there is limited evidence of the scope and content of these systems.
- 0.5 point The company provides evidence of activities related to providing gender-appropriate sanitation facilities, but there is no evidence of company-wide systems in place.

b. Safety equipment (e.g.: PPE designed for women)?

- 2 points The company has company-wide systems in place to provide gender-appropriate safety equipment 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 provide gender-appropriate safety equipment, but there is limited evidence of the scope and content of these systems.
- 0.5 point The company provides evidence of activities related to providing gender-appropriate safety equipment, but there is no evidence of company-wide systems in place

c. Health services (e.g.: for family planning and sexual health)?

- 2 points The company has company-wide systems in place to provide gender-appropriate health services 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 provide gender-appropriate health services, but there is limited evidence of the scope and content of these systems.
- 0.5 point The company provides evidence of activities related to providing gender-appropriate health services, but there is no evidence of company-wide systems in place.

E.01.5 The company publicly discloses data on mining-related high potential incidents, serious injuries and fatalities among its workforce. (/6.00)

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

a. Discloses the number of mining-related high potential incidents, serious injuries and fatalities among its workforce, across successive time periods?

2 points The company discloses the recent (within the assessment period) absolute numbers of fatalities and HPI among its workforce, and the data is compared across successive time periods
OR

The company discloses the recent (within the assessment period) absolute numbers of fatalities and serious injuries among its workforce, and the data is compared across successive time periods.

1 point The company discloses the recent (within the assessment period) absolute numbers of fatalities and HPI among its workforce, but the data is not compared across successive time periods
OR

The company discloses the recent (within the assessment period) absolute numbers of fatalities and serious injuries among its workforce, but the data is not compared across successive time periods.

0.5 point The company discloses the recent (within the assessment period) absolute number of HPI or serious injuries or fatalities among its workforce.

b. Discloses such information on a site-disaggregated basis?

2 points The company discloses on a site-disaggregated basis the recent (within the assessment period) absolute numbers of fatalities and HPI among its workforce, and the data is compared across successive time periods
OR

The company discloses on a site-disaggregated basis the recent (within the assessment period) absolute numbers of fatalities and serious injuries among its workforce, and the data is compared across successive time periods

1 point The company discloses on a site-disaggregated basis the recent (within the assessment period) absolute numbers of fatalities and HPI among its workforce, but the data is not compared across successive time periods
OR

The company discloses on a site-disaggregated basis the recent (within the assessment period) absolute numbers of fatalities and serious injuries among its workforce, but the data is not compared across successive time periods.

0.5 point The company discloses information worth 2 points or 1 point, but not as a company-wide systematic approach
OR

The company discloses one dimension of the information described under a) on a site-disaggregated basis, across successive time periods or for one period only.

c. Confirms that its fatalities reporting includes fatalities of contract workers as well as employees?

2 points The company confirms that its fatalities reporting includes fatalities of contract workers as well as employees, and the data reported is compared across successive time periods and covers all of the company's activities.

1 point na

0.5 point The company confirms that its fatalities reporting includes fatalities of contract workers as well as employees, but the data reported is not compared across successive time periods

OR

The company confirms that its fatalities reporting includes fatalities of contract workers as well as employees, but the data reported does not cover all of the company's activities.

E.02.1 The company has systems in place to identify, assess, avoid, and mitigate potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain. (/6.00)

Can your company demonstrate at the corporate level that it:

a. Has systems in place to identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain?

2 points The company has company-wide systems in place to identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain, and there is detailed evidence of the scope and content of these systems.

1 point The company has company-wide systems in place to identify and assess potential risks of child labour in its areas of operations and entire supply chain, but not of all forms of forced, compulsory, trafficked labour

OR

The company has systems in place to identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain, 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 identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and entire supply chain, 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 potential risks of all forms of forced, compulsory, trafficked and child labour

b. Has systems in place to 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 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 to 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 cases of 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 track the implementation of these strategies and plans but does not disclose any data

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 tracks the implementation of these strategies and plans, but there is no information beyond narrative statement.

E.03.1 The company has systems in place to ensure its operations base their recruitment and employment practices on the principle of equal opportunity, in order to prevent all forms of discrimination in the workplace and promote workforce diversity. (/6.00)

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

a. Take specific measures to reflect its non-discrimination policies in their terms and conditions?

2 points The company has company-wide systems in place to ensure its operations take specific measures to reflect its non-discrimination policies in their terms and conditions, with reference to more than one particular group relevant to diversity, 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 reflect its non-discrimination policies in their terms and conditions, with reference to more than one particular group relevant to diversity, and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis

OR

The company has company-wide systems in place to ensure its operations take specific measures to reflect its non-discrimination policies in their terms and conditions and there is detailed evidence of the scope and content of these systems, but these systems refer only to one particular group relevant to diversity.

0.5 point The company provides a limited narrative description of systems in place to ensure its operations take specific measures to reflect its non-discrimination policies in their terms and conditions

OR

The company provides evidence of only one or two cases of operations having taken specific measures to reflect its non-discrimination policies in their terms and conditions.

b. Take specific measures to implement trainings to raise awareness on discrimination among management staff and workers or take other actions aiming at preventing and addressing issues of discrimination in the workplace?

2 points The company has company-wide systems in place to ensure its operations take specific measures to implement trainings to raise awareness on discrimination among management staff and workers and/or take other actions aiming at preventing and addressing issues of discrimination in the workplace, 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 take specific measures to implement trainings to raise awareness on discrimination among management staff and workers or take other actions aiming at preventing and addressing issues of discrimination in the workplace, 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 implement trainings to raise awareness on discrimination among management staff and workers or take other actions aiming at preventing and addressing issues of discrimination in the workplace, and there is detailed evidence of the scope and/or content of these system, 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 take specific measures to implement trainings to raise awareness on discrimination among management staff and workers, or take other actions aiming at preventing and addressing issues of discrimination in the workplace

OR

The company provides evidence of only one or two cases of operations having taken specific measures to implement trainings to raise awareness on discrimination among management staff

and workers, or having taken other actions aiming at preventing and addressing issues of discrimination in the workplace.

c. Set targets regarding diversity and inclusivity in its recruitment and employment practices?

- 2 points** The company has company-wide systems in place to ensure its operations set targets regarding diversity and inclusivity in its recruitment and employment practices and the targets cover at least two groups relevant to diversity and inclusivity, 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 set targets regarding diversity and inclusivity in its recruitment and employment practices, but not on a company-wide basis or only with reference to one particular group relevant to diversity or inclusivity.
- 0.5 point** The company refers to setting targets regarding diversity or inclusivity, but there is no evidence of company-wide systems in place.

E.04.1 The company has systems in place to ensure its operations actively respect the rights of workers to organise, collective bargaining and freedom of association. (/6.00)

- a. Organise, including by granting access to designated areas for labour organisers to meet with workers?*
- 2 points** The company has company-wide systems in place to ensure its operations respect the rights of workers to organise, including by granting access to designated areas for labour organisers to meet with workers, and there is detailed evidence of the scope and content of these systems
 - 1 point** The company has company-wide systems in place to ensure its operations respect the rights of workers to organise, but there is limited evidence of the scope and content of these systems.
 - 0.5 point** The company provides evidence of activities related to ensuring its operations respect the rights of workers to organise, but there is no evidence of company-wide systems in place.
- b. Collective bargaining, including by developing formal collective bargaining agreements?*
- 2 points** The company has company-wide systems that are intended to lead to the establishment of collective bargaining agreements across all 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 respect the rights of workers to collective bargaining, but there is limited evidence of developing formal collective bargaining agreements
 - 0.5 point** The company provides evidence of activities related to ensuring its operations develop formal collective bargaining agreements, but there is no evidence of company-wide systems in place.
- c. Freedom of association, including by allowing union meetings on site?*
- 2 points** The company has company-wide systems in place to ensure its operations respect the rights of workers to freedom of association, and allows union meetings on site, 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 respect the rights of workers to freedom of association, but there is no evidence of allowing union meetings on site.
 - 0.5 point** The company provides evidence of activities related to ensuring its operations respect the rights of workers to freedom of association, but there is no evidence of company- wide systems in place

E.05.1 The company tracks, reviews and acts to improve its performance on ensuring that its workers' wages meet or exceed verified living wage standards, or legal minimum wage, whichever is the highest. (/6.00)

Can your company demonstrate that it systematically:

a. Tracks and discloses the levels of its workers' wages against living wage standards, or legal minimum wage, whichever is the highest?

- 2 points** The company discloses recent company-wide data (within the assessment period) on the levels of workers' wages against living wage standards, or legal minimum wage, whichever is the highest.
- 1 point** The company discloses recent data (within the assessment period) on the levels of workers' wages against living wage standards, or legal minimum wage, whichever is the highest, but the data does not cover all of the company's activities
- 0.5 point** The company states that it tracks data on the levels of its workers' wages against living wage standards, or legal minimum wage, whichever is the highest, but does not disclose it

b. Audits and/or reviews the levels of wages against living wage standards, or legal minimum wage, whichever is the highest?

- 2 points** The company discloses detailed data on reviews and/or audits conducted within the assessment period to assess its performance on ensuring that its workers' wages meet or exceed living wage standards.
- 1 point** The company discloses limited data on reviews and/or audits conducted within the assessment period to assess its performance on ensuring that its workers' wages meet or exceed living wage standards.
- 0.5 point** The company states that regular reviews and/or audits of its performance on ensuring that its workers' wages meet or exceed living wage standards 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 ensuring that its workers' wages meet or exceed living wage standards, or legal minimum wage, whichever is the highest?

- 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 ensuring that its workers' wages meet or exceed living wage standards.
- 1 point** The company states that it integrates the recommendations from these audits and/or reviews to continuously improve its performance on ensuring that its workers' wages meet or exceed living wage standards, 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 ensuring that its workers' wages meet or exceed living wage standards, but there is no information on reviews and/ or audits that were actually conducted, and thus no information on the integration of recommendations.

E.06.1 Where applicable, the company has systems in place to identify, assess, and address the implications of automation and technological change for workers. (/6.00)

Can your company demonstrate at the corporate level that it:

a. Has systems in place to ensure its operations identify and assess the implications of automation and technological change for workers?

2 points The company has company-wide systems in place to ensure its operations identify and assess the implications of automation and technological change for workers, and there is detailed evidence of the scope and content of these systems.

1 point The company has company-wide systems in place to ensure its operations identify and assess the implications of automation and technological change for workers, but there is limited evidence of the scope and/or content of these systems

OR

The company has company-wide systems in place to ensure its operations identify and assess the implications of automation and technological change for workers, and there is detailed evidence of the scope and content of these systems, but not on a company-wide basis.

0.5 point The company provides a limited narrative description of systems to ensure its operations identify and assess the implications of automation and technological change for workers, but there is no information about the scope, content and actual implementation of these systems

OR

The company provides evidence of only one or two cases of operations having identified and assessed the implications of automation and technological change for workers.

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

2 points The company has company-wide systems in place to ensure its operations develop strategies and plans to address these identified implications, and there is detailed evidence of the scope and content of these systems.

1 point The company has company-wide systems in place to develop strategies and plans to address these identified implications 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 implications, 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 develop strategies and plans to address these identified implications, 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 developed strategies and plans to address these identified implications.

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 these strategies and plans but does not disclose any data

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 tracks the implementation of these strategies and plans, but there is no information beyond narrative statement

E.07.1 The company tracks, reviews and acts to improve the effectiveness of its grievance mechanisms for workers. (/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 workers, 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 worker grievances were filed at all within the assessment period and the data is compared across successive time periods.

1 point The company discloses company-wide recent data (within the assessment period) on two of the three dimensions only: number, nature or actions taken in response

OR

The company reports that no worker 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 the data is compared across successive time periods but does not cover all of the company's activities

OR

The company reports that no worker grievances were filed at all within the assessment period 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 one of the three dimensions only: number, nature or actions taken in response

OR

The company reports that no worker grievances were filed within the assessment period on some topics only

OR

The company discloses recent data (within the assessment period) on two of the three dimensions 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 worker 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 activities.

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

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 workers.

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 workers.

0.5 point The company states that regular reviews and/or audits of the effectiveness of its grievance mechanisms for workers 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 workers?

- 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 grievance mechanisms for workers.
- 1 point** The company states that it integrates the recommendations from these audits and/ or reviews to continuously improve the effectiveness of its grievance mechanisms for workers, 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 grievance mechanisms for workers, but there is no information on reviews and/or audits that were actually conducted, and thus no information on the integration of recommendations