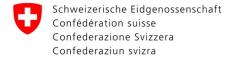
INTEGRATED ASSESSMENT TOOL FOR RESPONSIBLE MINING ASSURANCE

M3 Partnership

Revision 1.1

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1 Introduction

This Guidance document has been developed to facilitate the use of the **Integrated Assessment Protocol (IAP)**. This macro-enabled Excel Workbook was created to assist the Mining Organization and Operation with an integrated approach to assessing conformity to select responsible mining initiatives.

This workbook includes a combined protocol that represents the following standards:

- Towards Sustainable Mining (TSM)
- Initiative for Responsible Mining Assurance (IRMA)
- Responsible Jewelry Council (RJC)

The following sections describe the functionality of the IAP and provide a step-by-step instruction in its use.

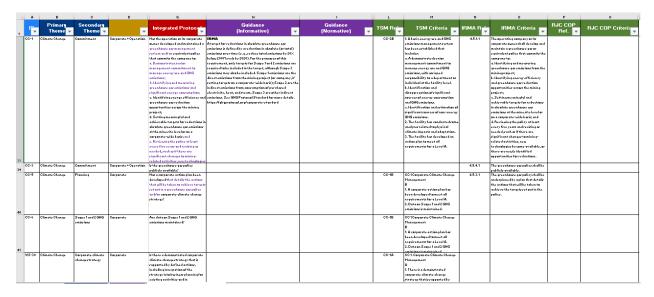
1.1 Mapping Methodology

The IAP assessment criteria were developed by mapping the requirements of the three standards against a detailed set of themes and subthemes. Under each subtheme, an assessment question, or a series of questions, was generated to reflect the scope relevant across the three standards. Each question was then linked to the original requirement of each standard, if applicable. As a result, a question could be mapped to one or any combination of standards including all three. An extract from the mapping spreadsheet is provided below.

Similarly, guidance, either deemed mandatory or informative, was included as it was mapped to the original requirement of the standard.

The mapping was reviewed by the three M3 Partnership members, and their requested edits were addressed in producing a final version, which was then inserted in the IAP workbook's data table.

Example from mapping spreadsheet



1.2 Addressing Variable Definitions and Terminology

The standards largely reference the same external, globally accepted frameworks and principles, however, there are notable differences in the terminology used and certain definitions. It is the responsibility of the IAP user to consult the original standards and their associated guidance in order to fully understand the differences. Certain language in the IAP criteria have been adjusted to achieve uniformity, including:

- Stakeholder representing stakeholder, rights holder, community of interest, or similar terms
- Organization the owner or parent company responsible for the operation of the mining facility
- Operation the mining facility or site, as defined by the organization for the purposes of establishing the scope of applicability for implementation of the standards.

1.3 Addressing Variable Conformity Levels

See Appendix 1 for description of the conformity levels established by the three standards, and how they have been aligned to establish the five conformity options in the IAP, summarized as follows:

Standard	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable
TSM	Insufficient evidence to support implementation			Sufficient evidence to support implementation	Not applicable with rationale
RJC	Critical breach	Major nonconformance	Minor nonconformance	Conformance	Not applicable
IRMA	Does not meet	Partially meets	Substantially meets	Fully meets	Not applicable

1.4 Disclaimer

This publication was prepared for the M3 Partnership to facilitate integrated assessment to their respective standards and assurance frameworks. It is not intended to render legal advice or to establish definitive criteria to represent industry best practice.

We strive to ensure the information in this publication is accurate, complete, and useful. However, neither the M3 Partnership, its members, or their development partner, ERM, makes any warranty, express or implied, or assumes any legal liability for the accuracy, completeness, or usefulness of any information herein, or represents that its use would not infringe privately owned rights; or assumes any liability with respect to the use of, or for damages resulting from the use of any information, method or process disclosed in this publication.

Other institutions, organizations and agencies are cautioned not to use this information without significant review and scrutiny.

2 Getting Started

This section provides a brief description of the steps required to complete the IAP. A more detailed description of each workbook tab is provided below,

Facility Mapping

List the names of the mining operations and identify what standards are applicable.

Theme Selection

Choose whether the assessment is full scope or partial scope by identifying which themes are to be presented in the protocol.

Select Operation

Start on the Cover page and input the date and select the operation by:

- Selecting what the type of Scope you are assessing (Operation, Corporate, JV, or Legacy)
- Selecting the Country of the scope
- Selecting the Operation
- Select the applicable Themes in the Theme Selection tab

Ensure to then complete the assessment team and other site representatives' inputs.

Complete Assessment Protocol

Once the operation and themes are selected, go to the TOC tab to choose a theme.

This will bring you to the protocol form where you may begin completing the assessment by completing the various information boxes.

- Self-Assessment;
- Documentation Referenced;
- Assessment Participant (who you consulted to complete the assessment)
- Conformity Level;
- Technology Aid (if relevant)
- Finding; and
- Recommendations.

It is also possible to input data directly into the Data Table if preferred.

Analytics and Dashboard

View graphically, summaries of conformity to each standard and across each theme and subtheme.

Generate Report

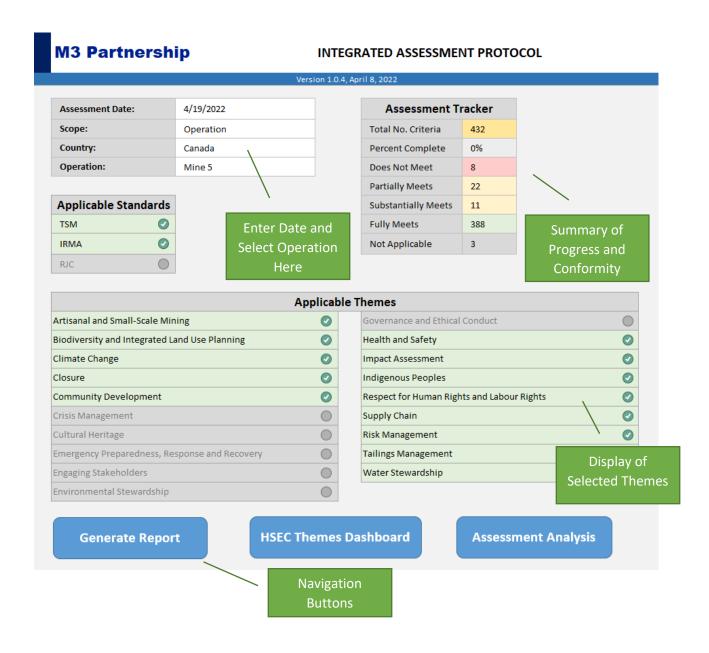
Click the Generate Report button on the Cover Page to save the assessment in a separate, unformatted CSV file. This file can then be used as import data into other digital platforms.

3 The IAP Cover Page

The IAP Cover Page (screen capture shown below) is where the assessor will input the general information for the applicable operation including the date, selected operation, assessment team and other site representatives.

The Cover Page also includes the Assessment Tracker, which shows the percent of the assessment complete and number of questions for each conformity level in the assessment. as well as the applicability indicators, indicating which standards are applicable to the selected operation.

Lastly, the user can use buttons at the bottom to generate a report, navigate to the HSEC Themes Dashboard, or to the Assessment Analysis. These features are further described below.



4 Theme Selection

Theme Selection is where particular themes can be selected or excluded from the assessment, by either placing or removing the number '1' in the cell to the right of the theme. Based on this selection, the themes will then be available for navigation and completion in the protocol, or not. In the main data table, any theme deselected will be grayed out and shown on the left with a Minus icon instead of a Check Mark.

Select Applicable Themes

Available Themes	Include •
Artisanal and Small-Scale Mining	1
Biodiversity and Integrated Land Use Planning	1
Climate Change	1
Closure	1
Community Development	1
Crisis Management	1
Cultural Heritage	1
Emergency Preparedness, Response and Recovery	
Engaging Stakeholders	1
Governance and Ethical Conduct	1
Environmental Stewardship	
Health and Safety	
Impact Assessment	1
Indigenous Peoples	1
Respect for Human Rights and Labour Rights	
Risk Management	
Supply Chains	1
Tailings Management	1
Water Stewardship	1

5 Facility Mapping

The Facility Mapping tab contains a table showing what standards have been chosen to be applicable to each operation. In this table, the user needs to list out the mining operations that will use the IAP. Their country of location and mine name should be included. For each mining operation, choose which standard is applicable by placing a '1' in the corresponding cell of the table. Based on this selection, criteria in the protocol will be available for use, or not. Any non-applicable criteria will show as grayed out in the data table and will have a '-' sign in the left column instead of a check mark.

Facilit	Facility Mapping									
Scope	Country	Mining Operation	TSM	IRMA	RJC	HSEC Standards				
Operation	Australia	Mine 1								
Operation	Australia	Mine 2								
Operation	Brazil	Mine 3								
Operation	Brazil	Mine 4								
Operation	Canada	Mine 5	1	1						
Operation	Canada	Mine 6	1	1	1					
Operation	Peru	Mine 7								
Operation	Peru	Mine 8								
Operation	South Africa	Mine 9								
Operation	South Africa	Mine 10	1		1					
Operation	USA	Mine 11	1							
Operation	USA	Mine 12	1							
Corporate	NA	NA	1		1					

6 The IAP Table of Contents

The Table of Contents (TOC) provides a starting point for navigating the use of the protocol. Each theme is listed in order; and by clicking on the arrow to the left, the user will be taken to the IAP Protocol. The TOC also shows the user's progress towards completion. The number of questions answered is shown and until there is text in the assessment box for each criterion, it will not show complete. The total number of questions answered and the total selected based on scoping, is shown in the top right.

M3 Partnership - Integrated Assessment Protocol

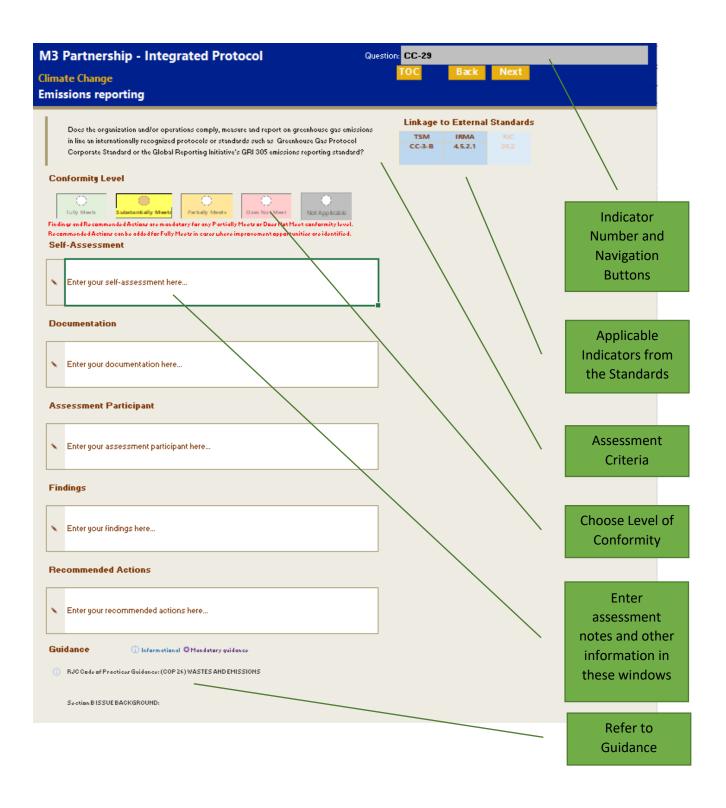
Ta	ble of Contents	1 of 610	answer	ed
Go	Themes	Question s	Answei	red
•	Artisanal and Small-Scale Mining	7	0	Δ
•	Biodiversity and Integrated Land Use Planning	33	0	Δ
•	Climate Change	22	0	Δ
•	Closure	30	0	Δ
•	Community Development	3	0	Δ
•	Crisis Management	20	0	Δ
•	Cultural Heritage	18	0	Δ
•	Emergency Preparedness, Response and Recovery	9	0	Δ
•	Engaging Stakeholders	66	1	Δ
•	Governance and Ethical Conduct	22	0	Δ
•	Environmental Stewardship	43	0	Δ
•	Health and Safety	69	0	Δ
•	Impact Assessment	20	0	Δ
•	Indigenous Peoples	36	0	Δ
•	Respect for Human Rights and Labour Rights	101	0	Δ
•	Risk Management	8	0	Δ
•	Supply Chain	16	0	Δ
•	Tailings Management	45	0	Δ
•	Water Stewardship	42	0	Δ

7 The IAP Input Protocol

The assessment questions are located within the Protocol worksheet. If an operation is not selected, all possible assessment questions will be shown. If an operation is selected, then only the questions that apply to that operation will be shown, based on the Facility Mapping and Theme Selection.

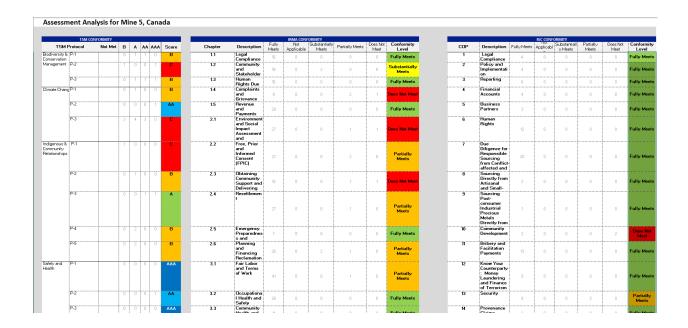
The Protocol provides a forms-based input screen for each separate assessment criterion. As shown in the screen capture below, there is navigation between criteria, buttons to select the conformity level, input windows for the response, and at the bottom, any guidance notes that were identified through the mapping process.

Note that Findings and Recommended Actions are mandatory for any Partially Meets or Does Not Meet conformity level. Recommended Actions can be added for Fully Meets in cases where improvement opportunities are identified.



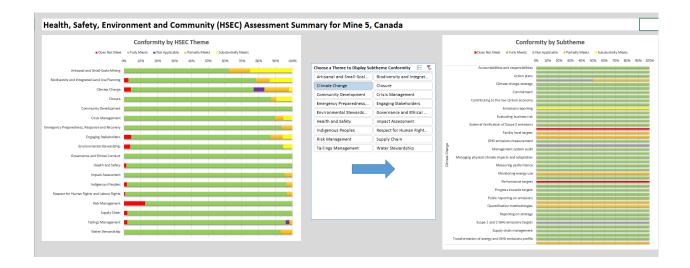
8 Assessment Analysis

The Assessment Analysis tab contains tables of conformity by standard for the operation, providing an overall summary of conformity. Colour-coding is provided to aid in representation. Not that if not all questions have been addressed, conformity cell will state Incomplete and be coloured purple.



9 HSEC Themes Dashboard

The HSEC Themes Dashboard provides a graphical representation of conformity to Health, Safety, Environment and Communities Themes and Subthemes around which the IAP is organized. The Subtheme graph can be altered by selected which theme is desired to be viewed.





10 Working Directly in the Data Table

It is possible to input assessment responses directly in the data table. If this method is chosen, it is recommended that the filters in the headers be used to aid in navigation. For example, if the assessment topic is climate change use the Theme filter to select climate change and deselect the rest. These filter, and sort function, can be used in a variety of ways and do not impact on the functionality of the Protocol or the dashboards.

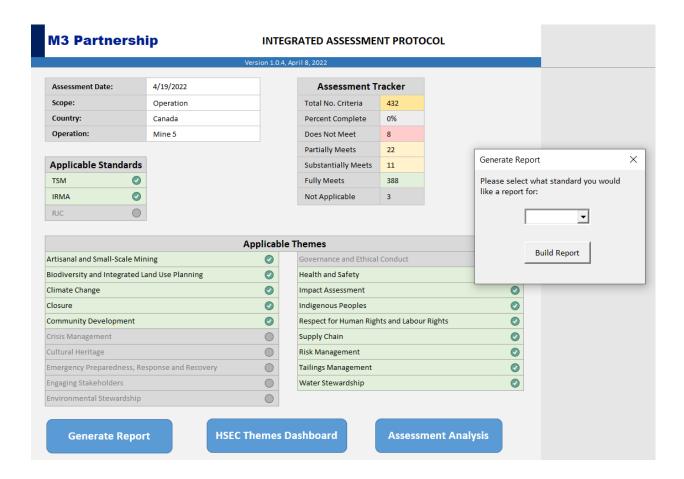
	ID	Scope of Applicability	Theme	Subtheme	Assessment Criteria	TSM Ref.	IRMA Ref.	RJC Ref.	Implementation Guidance (Related Informative and Mandatory)	Self-Assessment	Assessment Participants	Documentation F
V	-i	•		~	▼	¥	¥	¥	mandatory)	<u>-</u>	<u>▼</u>	
⊘	ASM-01	Operation	Artisanal and Small- Scale Mining	Mercury Wastes	Is there evidence to verify that: I. mercury wastes are not permanently stored on site without adequate safeguards; ii. are not sold or given to artisanal or small-scale miners; and lill. are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories?		4.8.2.2	41.1				
Ø	ASM-02	Operation	Artisanal and Small- Scale Mining	Scoping	If the company has identified the presence of artistanal and small scale mining ASMI entitles on their mining concession on in close proximity to their operations, has the company carried ust a score grocess to understand the legal, social and environmental contest in which ASMI activities are occurring?		3.6.1.1	35.1	I IRIC Code of Practices Guidance Review: (COP 8) SOURCING DIRECTLY FROM ARTISANA, AND SAMLL: SCALE MINING, and (COP 53) ARTISANA, LAND SAMLL: SCALE MINING AND LARGE-SCALE MINING AND LARGE-SCALE MINING AND LARGE-SCALE OP 8 1.18: Towards better 63M COP 8 1.18: Towards 63M COP 8			
⊘	ASM-03	Operation	Artisanal and Small- Scale Mining	Engagement	When an operation has identified the presence of ARA on or in close proximity to its mining project, and where there is no instead in a factor of the control of the contro		3.6.2.1	35.1	J IIBMA See IIBMA Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy.			

11 Generate and Accessing Reports

Once you have completed your assessment (indicated by 100% showing on the Cover Page Assessment Tracker), you can generate reports for each standard that is applicable to the operation.

Click on the "Generate Report" button on the cover page, then select the report you would like to generate a report for either the individual standard selected in Facility Mapping or All standards.

Generating a report will create an unformatted CSV file that can then be saved in the folder of choice and used as input into Dashboards or other analytical tools.



Once the assessment is completed, you can also use the "Assessment Analysis" button to go to the Assessment Analysis tab and use the pivot table to review conformity data with each protocol, and/or the HSEC Dashboard to review HSEC standards conformity.

12 Instructions for Verifiers

Once the Organization has completed and submitted their self-assessment to the verifier, the following activities are recommended:

- Verifier to work directly in the Data tab
- Go to Columns with Purple Headers and work only in these cells
- Enter the Verifier Assessment of the evidence provided in the Independent Verification Assessment column
- Choose a conformity level in the Independently Verified Conformity Level column
- Enter evidence to support the chosen conformity level in the Findings column
- If within the scope of the assessment, provide recommendations to address the conformity in the Recommendations column
- The Summary of Comparison between Self-assessed and Verified Conformity is available in the Verification Analysis tab

Appendix 1

The following table aligns conformity levels across the various schemes to establish a representative conformity level for the Integrated Assessment Protocol

Recommended Conformity Levels	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
TSM	Insufficient evidence to support implementation of the requirement	Not defined	Not defined	Sufficient evidence to support implementation of the requirement	Requirements are not applicable at the mine site. Mines will be expected to provide rationale for why requirements are not relevant.	If a requirement is not met, the scoring level achieved drops to the level at which all applicable requirements have been met

Recommended Conformity	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
Levels						
RJC	Critical breach The member's business practices (including its policies, systems, procedures and processes) perform in a way that does not conform to relevant COP provision. Has finding that is rated as a major non- conformance for any critical provision as per Table 6.	Major nonconformance - The member's business practices (including its policies, systems, procedures and processes) perform in a way that does not conform to the relevant COP provision. Major non- conformances pose an imminent significant risk to employees, the community or the environment. They can occur when the member: • Has a persistent (or high-impact isolated) lapse in the performance, discipline or control of its business practices; • Has not implemented a required provision at all; • Has a systemic failure or total lack of controls needed to manage business risks related to the COP; • Has knowingly ignored a relevant legislative or regulatory	Minor nonconformance - The member's business practices (including its policies, systems, procedures and processes) perform in a way that does not wholly conform to the relevant COP provision. Minor non- conformances do not result in an imminent significant risk to employees, the community or the environment. They can occur when the member:	Conformance - The member's business practices (including its policies, systems, procedures and processes) perform in a way that conforms to the relevant COP provision.	Not applicable - The member cannot conform to the relevant COP provision because of the nature of its business covered by the COP certification scope. Refer to Appendix 1 Table A1 for further details.	A group of minor non-conformances may be elevated to a major non-conformance rating if there is evidence that the minor non-conformances are: • Related in terms of the provision, activity being controlled or even the nature of the non-conformance across multiple facilities; • Repetitive, bringing up the same issue throughout the business (which is often symptomatic

Recommended Conformity Levels	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
		requirement, or has not adequately tried to rectify a nonconformance with a relevant legislative or regulatory requirement; • Has a group of related, repetitive or persistent minor nonconformances, indicating inadequate implementation; • Is subject to any finding or observation supported with objective evidence that proves a critical breach, or that raises serious doubts as to whether the member has the business practices to avoid any critical breach.	with a relevant legislative or regulatory requirement but has adequately tried to rectify the non- compliance; • Is not in compliance with a relevant legislative or regulatory requirement, but has made good faith efforts to comply; or • Is found to have a business practice that does not breach the COP now but could potentially cause a major nonconformance.			of a systemic failure or absence of controls); or • Persistent, occurring again and again because of ineffective corrective action.

Recommended Conformity	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
Levels			,			
IRMA	Does not Meet - Major nonconformity with the requirement - Relevant policies, procedures not developed, actions have not been taken to meet performance measures, or requirements are not being met despite efforts being made by the company.	Partially Meets - Major nonconformity with the requirement - Relevant procedures, methodologies, training programs, or work plans, etc. are under development; or policies, procedures, etc. are in place but do not have sufficient detail and need significant augmentation; or they are in place but are not being implemented or are inconsistently applied; or implementation is in early stages so difficult to gauge its effectiveness/successful implementation. — Where requirements are performance-based, mine has taken some actions to meet the performance measure, but there is considerable additional work necessary. — Where subrequirements exist, the majority or all of the	Substantially Meets - Minor nonconformity with the requirement - Relevant policies, procedures, methodologies, training programs, or work plans, etc. have sufficient detail or require only minor augmentation. For example: — Where requirements are performance- based, mine has implemented appropriate actions to meet the performance measure, but is not fully meeting it. Some augmentation or modification required. — Where sub- requirements exist, the	Fully Meets - No nonconformity with the requirement Relevant policies, procedures, methodologies, training programs, or work plans, etc. and performance meet the requirement as written or fully meet its intent. Stated performance for all elements or subrequirements is evident with extremely rare exceptions (and exceptions do not affect consistency with the objective(s) of the chapter).	Requirements are not applicable at the mine site. Mines will be expected to provide rationale for why requirements are not relevant.	According to IRMA's scoring system, when a site fully meets a requirement it scores 2 points, for substantially meeting it scores 1.5, for partially meeting it scores 1, and if the mine does not meet a requirement it scores 0.

Recommended Conformity Levels	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
		sub-requirements need clarification, augmentation or implementation.	majority of the sub-requirements are being met, but one or a few factors need clarification, augmentation or complete implementation.			