

# INTEGRATED ASSESSMENT TOOL FOR RESPONSIBLE MINING ASSURANCE

**M3 Partnership**

Revision 1.1

June 28, 2022

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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

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	Primary Theme	Secondary Theme	Corporate + Operational	Integrated Protocol	Guidance (Informative)	Guidance (Normative)	TSM Ref.	TSM Criteria	IRMA Ref.	IRMA Criteria	RJC COP Ref.	RJC COP Criteria				
38	Climate Change	Commitment	Corporate + Operational	How the organization for corporate emissions develops and maintains a greenhouse gas management system and its equivalent policy that contains the company's: a. Greenhouse gas management commitment to manage energy use and GHG emissions; b. Identifying and measuring greenhouse gas emissions and identifying energy management; c. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining projects; d. Setting measurable and achievable targets for reduction in absolute greenhouse gas emissions on the mine site level and corporate wide level; and e. Reviewing the policy at least every five years and developing a road map to address any significant changes in mining related activities, assets, capabilities	<b>IRMA</b> An organization for reduction in absolute greenhouse gas emissions is defined by a reduction in absolute (as total) emissions over time (i.e., a reduction total emissions by 20% below 2017 levels by 2025). For the purpose of this requirement, only targets for Scope 1 and 2 emissions are required to be included in the target, although Scope 3 emissions may also be included. Scope 1 emissions are the direct emissions from the mining project (or company, if certified to report on corporate wide level). Scope 2 are the indirect emissions from consumption of purchased electricity, heat, and steam. Scope 3 are all indirect emissions. See GHG Protocol Standard for more details. <a href="https://ghgprotocol.org/corporate-overview">https://ghgprotocol.org/corporate-overview</a>		CC-1B	1. A business uses an GHG emissions management system that has been established that includes: a. Demonstrated senior management commitment to manage energy use and GHG emissions, with assigned responsibility to department or individual in the facility level; b. Identification and determination of significant year-over-year energy consumption and GHG emissions; c. Identification and activation of significant sources of non-energy GHG emissions; 2. The facility has conducted a risk analysis to the physical climate impacts and adaptation; 3. The facility has developed an action plan to meet all requirements for 4.5.4.1.	4.5.4.1	The operating company or its representative shall develop and maintain a greenhouse gas management policy that contains the company's: a. Identify and measure greenhouse gas emissions from the mining projects; b. Identify energy efficiency and greenhouse gas reduction opportunities across the mining projects; c. Setting meaningful and achievable targets for reduction in absolute greenhouse gas emissions at the mine site level and corporate wide level; and d. Reviewing the policy at least every five years and developing a road map to address any significant changes to mining related activities, assets, capabilities or there are newly identified opportunities for reduction.						
39	Climate Change	Commitment	Corporate + Operational	Is the greenhouse gas policy public accessible?									4.5.4.1	The greenhouse gas policy shall be public accessible.		
40	Climate Change	Planning	Corporate	Has a corporate action plan been developed that includes the content that will be taken to achieve targets set within the greenhouse gas policy and/or appropriate climate change strategy?			CC-1B	CC1 Corporate Climate Change Management B 1. A corporate action plan has been developed to meet all requirements for 4.5.4.1. 2. Data on Scope 1 and 2 GHG emissions is maintained.	4.5.3.1	The greenhouse gas policy shall be implemented by action that include the action that will be taken to achieve the target set in the policy.						
41	Climate Change	Scope 1 and 2 GHG emissions	Corporate	Are data on Scope 1 and 2 GHG emissions maintained?			CC-1B	CC1 Corporate Climate Change Management B 1. A corporate action plan has been developed to meet all requirements for 4.5.4.1. 2. Data on Scope 1 and 2 GHG emissions is maintained.								
42	Climate Change	Corporate climate change strategy	Corporate	Is there a demonstrated corporate climate change strategy that is supported by defined action, including integration of the strategy into business plan and/or related operational and/or			CC-1A	CC1 Corporate Climate Change Management A 1. There is a demonstrated corporate climate change strategy that is supported by								

### 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:

<b>Standard</b>	<b>Does Not Meet</b>	<b>Partial Conformity</b>	<b>Substantial Conformity</b>	<b>Fully Meets</b>	<b>Not Applicable</b>
<b>TSM</b>	Insufficient evidence to support implementation			Sufficient evidence to support implementation	Not applicable with rationale
<b>RJC</b>	Critical breach	Major nonconformance	Minor nonconformance	Conformance	Not applicable
<b>IRMA</b>	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.

**M3 Partnership** **INTEGRATED ASSESSMENT PROTOCOL**  
Version 1.0.4, April 8, 2022

Assessment Date:	4/19/2022
Scope:	Operation
Country:	Canada
Operation:	Mine 5

**Assessment Tracker**

Total No. Criteria	432
Percent Complete	0%
Does Not Meet	8
Partially Meets	22
Substantially Meets	11
Fully Meets	388
Not Applicable	3

**Applicable Standards**

TSM	<input checked="" type="checkbox"/>
IRMA	<input checked="" type="checkbox"/>
RJC	<input type="checkbox"/>

**Applicable Themes**

Artisanal and Small-Scale Mining	<input checked="" type="checkbox"/>
Biodiversity and Integrated Land Use Planning	<input checked="" type="checkbox"/>
Climate Change	<input checked="" type="checkbox"/>
Closure	<input checked="" type="checkbox"/>
Community Development	<input checked="" type="checkbox"/>
Crisis Management	<input type="checkbox"/>
Cultural Heritage	<input type="checkbox"/>
Emergency Preparedness, Response and Recovery	<input type="checkbox"/>
Engaging Stakeholders	<input type="checkbox"/>
Environmental Stewardship	<input type="checkbox"/>
Governance and Ethical Conduct	<input type="checkbox"/>
Health and Safety	<input checked="" type="checkbox"/>
Impact Assessment	<input checked="" type="checkbox"/>
Indigenous Peoples	<input checked="" type="checkbox"/>
Respect for Human Rights and Labour Rights	<input checked="" type="checkbox"/>
Supply Chain	<input checked="" type="checkbox"/>
Risk Management	<input checked="" type="checkbox"/>
Tailings Management	<input type="checkbox"/>
Water Stewardship	<input type="checkbox"/>

**Generate Report** **HSEC Themes Dashboard** **Assessment Analysis**

## 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.

<b>Select Applicable Themes</b>	
<b>Available Themes</b>	<b>Include</b>
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.

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

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

## 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.

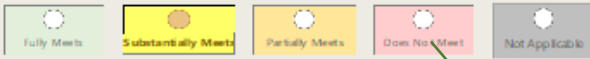
**Note** that Findings and Recommended Actions are mandatory for any Partially Meets or Does Not Meet conformity level. Recommended Actions can be added for Fully Meets in cases where improvement opportunities are identified.

Does the organization and/or operations comply, measure and report on greenhouse gas emissions in line an internationally recognized protocols or standards such as Greenhouse Gas Protocol Corporate Standard or the Global Reporting Initiative's GRI 305 emissions reporting standard?

Linkage to External Standards

TSM	IRMA	RJC
CC-3-B	4.5.2.1	262

Conformity Level



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

Self-Assessment

Enter your self-assessment here...

Documentation

Enter your documentation here...

Assessment Participant

Enter your assessment participant here...

Findings

Enter your findings here...

Recommended Actions

Enter your recommended actions here...

Guidance

Informational  Mandatory guidance

RJC Code of Practice Guidance: (COP 26) WASTES AND EMISSIONS

Section B ISSUE BACKGROUND:

Indicator Number and Navigation Buttons

Applicable Indicators from the Standards

Assessment Criteria

Choose Level of Conformity

Enter assessment notes and other information in these windows

Refer to Guidance

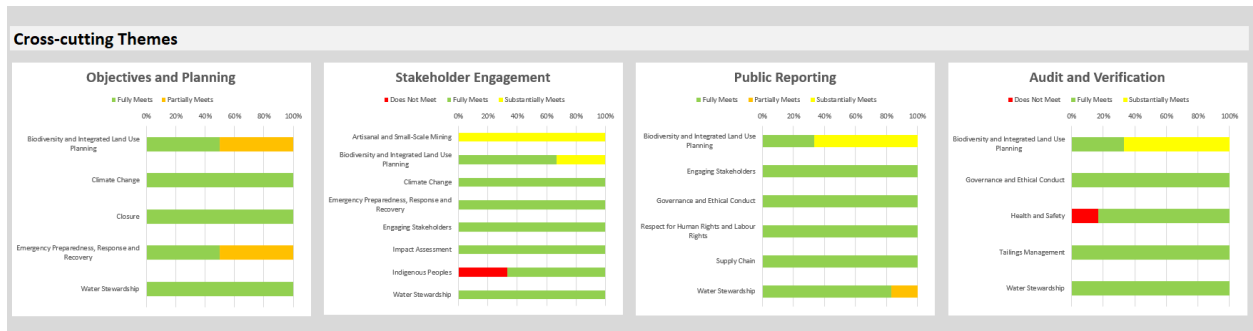
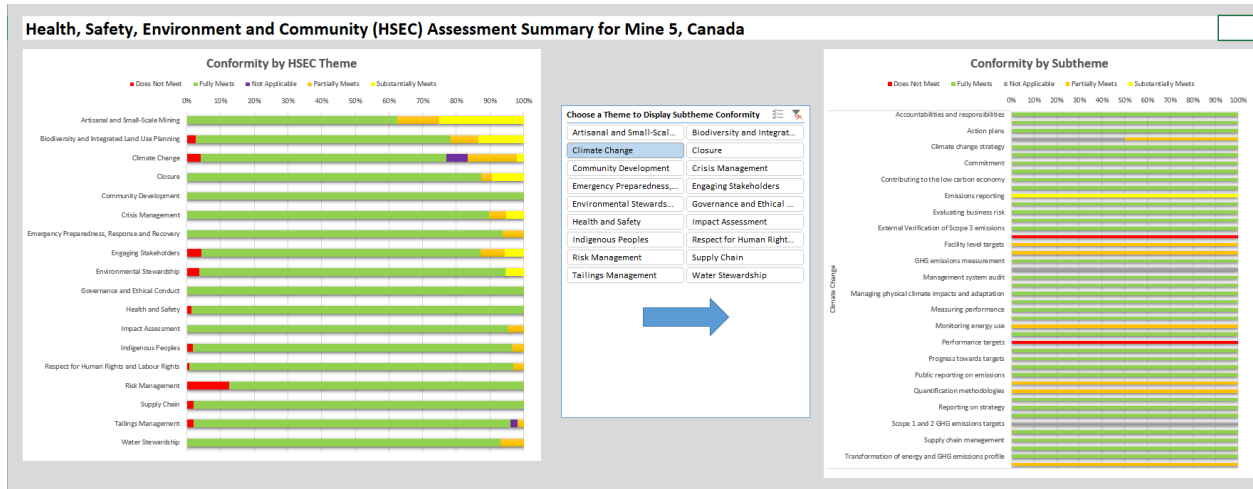
## 8 Assessment Analysis

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.

TSM CONFORMITY						ISMA CONFORMITY						RJC CONFORMITY										
TSM Protocol	Not Met	B	A	AA	AAA	Score	Chapter	Description	Fully Meets	Not Applicable	Substantially Meets	Partially Meets	Does Not Meet	Conformity Level	CDP	Description	Fully Meets	Applicable	Substantially Meets	Partially Meets	Does Not Meet	Conformity Level
Biodiversity & Conservation Management	P-1	0	0	0	0	B	1.1	Legal Compliance	5	0	0	0	0	Fully Meets	1	Legal Compliance	4	0	0	0	0	Fully Meets
	P-2	1	0	0	1	C	1.2	Community and Stakeholder	8	0	2	0	0	Substantially Meets	2	Legal Compliance Policy and Implementation	4	0	0	0	0	Fully Meets
	P-3	0	1	1	1	B	1.3	Human Rights Due Diligence	5	0	0	0	0	Fully Meets	3	Reporting	5	0	0	0	0	Fully Meets
Climate Change	P-1	0	0	0	0	B	1.4	Complaints and Grievance	9	0	0	2	1	Does Not Meet	4	Financial Accounts	4	0	0	0	0	Fully Meets
	P-2	0	0	0	1	AA	1.5	Revenue and Payments	28	0	0	0	0	Fully Meets	5	Business Partners	3	0	0	0	0	Fully Meets
	P-3	3	4	3	0	C	2.1	Environment and Social Impact Assessment and	27	0	0	1	1	Does Not Meet	6	Human Rights	12	0	0	0	0	Fully Meets
Indigenous & Community Relationships	P-1	1	0	0	0	C	2.2	Free, Prior and Informed Consent (FPIC)	21	0	0	2	0	Partially Meets	7	Due Diligence for Responsible Sourcing from Conflict-affected and	20	0	0	0	0	Fully Meets
	P-2	0	1	0	0	B	2.3	Obtaining Community Support and Delivering Resettlement	10	0	0	1	1	Does Not Meet	8	Sourcing Directly from Artisanal and Small-Scale	2	0	0	0	0	Fully Meets
	P-3	0	0	1	1	A	2.4	Emergency Preparedness and Planning and Financing Reclamation	27	0	0	1	0	Partially Meets	9	Sourcing Post-consumer Industrial Precious Metals Directly from Community Development	1	0	0	0	0	Fully Meets
	P-4	0	2	0	0	B	2.5	Fair Labor and Terms of Work	7	0	0	0	0	Fully Meets	10	Bribery and Facilitation Payments	2	0	0	0	2	Does Not Meet
	P-5	0	2	0	0	B	2.6	Occupational Health and Safety	25	0	2	1	0	Partially Meets	11	Know Your Counterparty Money Laundering and Finance of Terrorism Security	13	0	0	0	0	Fully Meets
Safety and Health	P-1	0	0	0	0	AAA	3.1	Community Outreach	41	0	0	1	0	Partially Meets	12	Provenance	9	0	0	0	0	Fully Meets
	P-2	0	0	0	1	AA	3.2	Occupational Health and Safety	28	0	0	0	0	Fully Meets	13		9	0	0	2	Partially Meets	
	P-3	0	0	0	0	AAA	3.3	Community Outreach	11	0	0	0	0	Fully Meets	14		11	0	0	0	Fully Meets	

# 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.

Assessment Protocol for Mine 5, Canada												
Applicable	ID	Scope of Applicability	Theme	Subtheme	Assessment Criteria	TSM Ref.	IRMA Ref.	IJC Ref.	Implementation Guidance (Related Informative and Mandatory)	Self-Assessment	Assessment Participants	Documentation Ref.
✓	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 iii. are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories?		4.8.2.2	41.1				
✓	ASM-02	Operation	Artisanal and Small-Scale Mining	Scoping	If the company has identified the presence of artisanal and small-scale mining (ASM) entities on their mining concession or in close proximity to their operations, has the company carried out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring?		3.6.1.1	35.1	IJC Code of Practices Guidance Review: (COP 8) SOURCING DIRECTLY FROM ARTISANAL AND SMALL-SCALE MINING, and (COP 35) ARTISANAL AND SMALL-SCALE MINING AND LARGE-SCALE MINING D IMPLEMENTATION GUIDANCE: COP 8.1A: ASM risk assessment COP 8.1B: Towards better ASM COP 35.1A: Engagement COP 35.1B: Professionalisation and formalisation			
✓	ASM-03	Operation	Artisanal and Small-Scale Mining	Engagement	When an operation has identified the presence of ASM on or in close proximity to its mining project, and where there is no material risk to company personnel, does it: a. Make a good faith effort to engage with ASM entities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts; b. Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning; c. Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and d. Inform ASM entities and communities that there is an operational-level grievance		3.6.2.1	35.1	IIRMA See IRMA 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.

**M3 Partnership** **INTEGRATED ASSESSMENT PROTOCOL**  
Version 1.0.4, April 8, 2022

Assessment Date:	4/19/2022
Scope:	Operation
Country:	Canada
Operation:	Mine 5

Assessment Tracker	
Total No. Criteria	432
Percent Complete	0%
Does Not Meet	8
Partially Meets	22
Substantially Meets	11
Fully Meets	388
Not Applicable	3

Applicable Standards	
TSM	<input checked="" type="checkbox"/>
IRMA	<input checked="" type="checkbox"/>
RJC	<input type="checkbox"/>

Applicable Themes	
Artisanal and Small-Scale Mining	<input checked="" type="checkbox"/>
Biodiversity and Integrated Land Use Planning	<input checked="" type="checkbox"/>
Climate Change	<input checked="" type="checkbox"/>
Closure	<input checked="" type="checkbox"/>
Community Development	<input checked="" type="checkbox"/>
Crisis Management	<input type="checkbox"/>
Cultural Heritage	<input type="checkbox"/>
Emergency Preparedness, Response and Recovery	<input type="checkbox"/>
Engaging Stakeholders	<input type="checkbox"/>
Environmental Stewardship	<input type="checkbox"/>
Governance and Ethical Conduct	<input type="checkbox"/>
Health and Safety	<input type="checkbox"/>
Impact Assessment	<input checked="" type="checkbox"/>
Indigenous Peoples	<input checked="" type="checkbox"/>
Respect for Human Rights and Labour Rights	<input checked="" type="checkbox"/>
Supply Chain	<input checked="" type="checkbox"/>
Risk Management	<input checked="" type="checkbox"/>
Tailings Management	<input checked="" type="checkbox"/>
Water Stewardship	<input checked="" type="checkbox"/>

Generate Report ✕

Please select what standard you would like a report for:

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

<b>Recommended Conformity Levels</b>	<b>Does Not Meet</b>	<b>Partial Conformity</b>	<b>Substantial Conformity</b>	<b>Fully Meets</b>	<b>Not Applicable</b>	<b>Notes</b>
<b>TSM</b>	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.	<b>If a requirement is not met, the scoring level achieved drops to the level at which all applicable requirements have been met</b>



Recommended Conformity Levels	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
RJC	<p>Critical breach</p> <ul style="list-style-type: none"> <li>The member's business practices (including its policies, systems, procedures and processes) perform in a way that does not conform to relevant COP provision.</li> </ul> <p>- Has finding that is rated as a major non-conformance for any critical provision as per Table 6.</p>	<p>Major nonconformance</p> <p>- 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.</p> <p>Major non-conformances pose an imminent significant risk to employees, the community or the environment. They can occur when the member:</p> <ul style="list-style-type: none"> <li>Has a persistent (or high-impact isolated) lapse in the performance, discipline or control of its business practices;</li> <li>Has not implemented a required provision at all;</li> <li>Has a systemic failure or total lack of controls needed to manage business risks related to the COP;</li> <li>Has knowingly ignored a relevant legislative or regulatory</li> </ul>	<p>Minor nonconformance</p> <p>- 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.</p> <p>Minor non-conformances do not result in an imminent significant risk to employees, the community or the environment. They can occur when the member:</p> <ul style="list-style-type: none"> <li>Has an isolated lapse in the performance, discipline or control of its business practices;</li> <li>Knows it has not complied</li> </ul>	<p>Conformance -</p> <p>The member's business practices (including its policies, systems, procedures and processes) perform in a way that conforms to the relevant COP provision.</p>	<p>Not applicable -</p> <p>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.</p>	<p><b>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:</b></p> <ul style="list-style-type: none"> <li><b>Related in terms of the provision, activity being controlled or even the nature of the non-conformance across multiple facilities;</b></li> <li><b>Repetitive, bringing up the same issue throughout the business (which is often symptomatic</b></li> </ul>

Recommended Conformity Levels	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
		<p>requirement, or has not adequately tried to rectify a nonconformance with a relevant legislative or regulatory requirement;</p> <ul style="list-style-type: none"> <li>• Has a group of related, repetitive or persistent minor non-conformances, indicating inadequate implementation;</li> <li>• 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.</li> </ul>	<p>with a relevant legislative or regulatory requirement but has adequately tried to rectify the non-compliance;</p> <ul style="list-style-type: none"> <li>• Is not in compliance with a relevant legislative or regulatory requirement, but has made good faith efforts to comply; or</li> <li>• Is found to have a business practice that does not breach the COP now but could potentially cause a major nonconformance.</li> </ul>			<p><b>of a systemic failure or absence of controls); or</b></p> <ul style="list-style-type: none"> <li>• <b>Persistent, occurring again and again because of ineffective corrective action.</b></li> </ul>

Recommended Conformity Levels	Does Not Meet	Partial Conformity	Substantial Conformity	Fully Meets	Not Applicable	Notes
IRMA	<p>Does not Meet</p> <ul style="list-style-type: none"> <li>- Major nonconformity with the requirement</li> <li>- 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.</li> </ul>	<p>Partially Meets - Major nonconformity with the requirement</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>— Where requirements are performance-based, mine has taken some actions to meet the performance measure, but there is considerable additional work necessary.</li> <li>— Where sub-requirements exist, the majority or all of the</li> </ul>	<p>Substantially Meets - Minor nonconformity with the requirement</p> <ul style="list-style-type: none"> <li>- Relevant policies, procedures, methodologies, training programs, or work plans, etc. have sufficient detail or require only minor augmentation.</li> </ul> <p>For example:</p> <ul style="list-style-type: none"> <li>— 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.</li> <li>— Where sub-requirements exist, the</li> </ul>	<p>Fully Meets - No nonconformity with the requirement.</p> <ul style="list-style-type: none"> <li>- Relevant policies, procedures, methodologies, training programs, or work plans, etc. and performance meet the requirement as written or fully meet its intent.</li> </ul> <p>Stated performance for all elements or sub-requirements is evident with extremely rare exceptions (and exceptions do not affect consistency with the objective(s) of the chapter).</p>	<p>Requirements are not applicable at the mine site. Mines will be expected to provide rationale for why requirements are not relevant.</p>	<p><b>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.</b></p>

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.			

