

Mine-site ESG data disclosure by small and mid-tier mining companies



**Responsible
Mining** Foundation

Acknowledgements

Funders

The Responsible Mining Foundation (RMF) would like to thank its 2018 funders:

Swiss State Secretariat for Economic Affairs

The Netherlands Ministry of Foreign Affairs

Omidyar Network Fund

RMF Expert Review Committee

Sonia Balcazar

Fritz Brugger

Li Li

Glen Mpufane

Lisa Sachs

Prabindra Shakya

Ingrid Watson

Luc Zandvliet

Mining-affected community consultation

RMF appreciates the support of Publish What You Pay, and the generous insights, recommendations and feedback provided by mining-affected community representatives from the following communities in Burkina Faso who participated in a consultation workshop on this study during its early development:

Bissa/Sabcé

Essakane

Inata

Kalsaka

Mana/Wona

Poura

Yalgo

Youga

Responsible Mining Foundation

This study has been undertaken by the Responsible Mining Foundation (RMF), an independent not-for-profit organization that encourages continuous improvement in responsible mining across the industry by developing tools and frameworks, sharing public-interest data and enabling informed and constructive engagement between mining companies and other stakeholders. The Foundation's work and research reflects what society at large can reasonably expect from mining companies on economic, environmental, social and governance matters. As an independent foundation, RMF does not accept funding or other contributions from the mining industry.

The Foundation's biennial report, the Responsible Mining Index (RMI), is an evidence-based assessment of large-scale mining companies' policies and practices on a range of economic, environmental, social and governance issues. The first such report, RMI 2018, was published in April 2018 (see www.responsibleminingindex.org) and the second RMI report is due to be published in 2020. Alongside the RMI report, the Foundation carries out complementary studies on particular aspects of responsible mining, always with a focus on encouraging continuous improvement.

Report design

Omdat Ontwerp, The Netherlands

Mine-site ESG data disclosure by small and mid-tier mining companies

Glossary

AIIB	Asian Infrastructure Investment Bank
AIM	Sub-market of London Stock Exchange
ASM	Artisanal and Small-scale Mining
ASX	Australian Securities Exchange
BUSD	Billion US dollars
CCCMC	China Chamber of Commerce for Metals, Minerals and Chemical Importers
EWB-MSV	Engineers Without Borders - Mining Shared Value
GRI	Global Reporting Initiative
IFC	International Finance Corporation
ILO Convention 169	ILO Convention on Indigenous Peoples (1989)
ILO Convention 176	ILO Convention on Safety and Health in Mines (1995)
IRMA	Initiative for Responsible Mining Assurance
ESG	Environmental, Social and Governance
GDP	Gross Domestic Product
ILO	International Labour Organisation
MAC	Mining Association of Canada
NRGI	Natural Resource Governance Institute
NYSE	New York Stock Exchange
OMX	NASDAQ OMX Stockholm Exchange
PPE	Personal Protective Equipment
RMI	Responsible Mining Index
RMF	Responsible Mining Foundation
TMX	Toronto Stock Exchange and TSX Venture Exchange
TSM	Towards Sustainable Mining – Mining Association of Canada
TSX	Toronto Stock Exchange
TSX.V	Toronto Venture Stock Exchange
UN	United Nations

Table of Contents

7 Introduction and scope

- 8 Introduction and summary
- 12 Geographic and company scope
- 14 Indicators

19 Findings and overall results

- 20 Key findings
- 22 Observations
- 25 Overall results

31 Mine-site results

32 How to read the results

34 Alamos Gold

- 35 El Chanate
- 36 Island Gold
- 37 Mulatos
- 38 Young-Davidson

40 Avesoro Resources

- 41 Balogo
- 42 New Liberty
- 43 Youga

44 Centerra Gold

- 45 Kumtor
- 46 Mount Milligan

48 Endeavour Mining

- 49 Agbaou
- 50 Houndé
- 51 Ity
- 52 Karma
- 53 Tabakoto

54 Iamgold

- 55 Essakane
- 56 Rosebel
- 57 Westwood

58 Imperial Metals

- 59 Mount Polley
- 60 Red Chris

62 Kirkland Lake Gold

- 63 Fosterville
- 64 Holt
- 65 Macassa
- 66 Taylor

68 Komet Resources

- 69 Guiro

70 New Gold

- 71 Cerro San Pedro
- 72 New Afton
- 73 Rainy River

74 Roxgold

- 75 Yaramoko

76 Semafo

- 77 Mana

78 Wesdome Gold Mines

- 79 Eagle River
- 80 Mishi

83 Methodology

- 84 Methodology

89 Annexes and References

- 90 Annex 1 | Full questionnaire
- 98 Annex 2 | Indicator mapping
- 100 References

Introduction and scope

Introduction and summary

This report presents the results of a desk-based study on mine-site-level disclosure of environmental, social and governance (ESG) data by small and mid-tier mining companies.

The study covers a sample of 12 Canadian-listed companies and assesses all their active mine sites (a total of 31) on the basis of their disclosure on a set of 15 key ESG topics. The central purpose of the report is to share current trends, best practice and society's expectations on mine-site-level disclosure.

Public disclosure of mine-site-level ESG data is an essential element for companies and local stakeholders to be able to develop trust-based relationships and engage in constructive discussions on issues of shared interest. With this in mind, the ESG issues covered in this study have been selected on the basis of consultations with mining-affected communities and other local stakeholders in different regions of the world, including a 2018 workshop held with mining-affected community representatives from Burkina Faso. The issues were identified by these stakeholders as among the top priorities for communities and workers, and information that society can reasonably expect mining companies to provide.

Site-level ESG data is also important for other stakeholders, including for example investors, shareholders and governments. Investors are increasingly asking for site-level data as aggregated company-level data can hide risks and performance issues associated with particular mining operations.

Companies themselves stand to gain from better knowledge management on ESG issues, by strengthening their ability to 'know and show' how they are addressing these issues.

Objectives and learning

The study set out to test and explore one of the key findings from the Responsible Mining Index (RMI) 2018 report, namely that mine-site-level data is largely missing on matters of direct interest to mining-affected communities, workers and other stakeholders.

The objectives of the study were to:

- Better understand the public reporting of mine-site-level ESG data by mining companies – how they collect and report data and what data they disclose,
- Focus on small and mid-tier companies, to complement the focus of RMI on majors; and
- Explore how to strengthen mine-site assessment for the next RMI report.

The study provided valuable learning on all three objectives:

- The assessment process revealed insights into companies' internal reporting mechanisms, including the clearance procedures required by head offices on public disclosure of ESG data by individual operations;

- The overall results show that while small and mid-tier companies' disclosure of site-level ESG data is generally very limited (consistent with the RMI 2018 report's finding for large-scale companies), their disclosure levels vary widely and even among these smaller companies, company size does not necessarily determine the extent of public reporting of ESG data; and
- The questions developed for this study have provided useful lessons that will be applied in the subsequent RMI report, to strengthen the mine-site-level assessment and the usefulness of the results to other stakeholders.

Scope

The scope of the study was designed to enable some comparability between companies' disclosure practices. Thus:

- **Listing:** All companies selected for inclusion are listed on the same stock exchange (TMX Toronto Stock Exchange and Venture Exchange);¹
- **Size:** All companies are small or mid-tier mining companies, with revenues under one billion US dollars.
- **Activities:** The 31 mine sites included in this study are all gold-producing mines, in some cases associated with silver and/or copper production.

These common characteristics provide the basis for the study's comparative assessment of mine-site-level ESG disclosure. The fifteen key ESG topics covered in the study are:

01	Community engagement	06	Workers' safety	11	Water quality
02	Local employment	07	Worker grievance mechanism	12	Air quality
03	Local procurement	08	Indigenous Peoples	13	Progressive rehabilitation
04	Community grievance mechanism	09	Artisanal and small-scale mining	14	Post-closure viability for communities
05	Living wage	10	Environmental impact assessments	15	Emergency preparedness and response plans

¹ TMX was selected as the common listing as it is the stock exchange with the largest number of listed mining companies. In 2017 some 59% of global mining financing was done on TMX (Toronto Stock Exchange and Toronto Venture Stock Exchange). See www.tsx.com/ebooks/en/2018-guide-to-listing/.

Summary of findings

The study confirms the finding from the RMI 2018 report that site-level disclosure of public-interest information is often lacking. Among these small and mid-tier companies, sustainability reporting is the exception rather than the norm and there are rarely other established mechanisms to provide site-disaggregated ESG data.² The reasons for the generally weak disclosure practices appear to stem largely from capacity constraints, non-prioritisation of ESG reporting, and concerns about confidentiality.

The study also identified a lack of consistent, company-wide approaches to site-level disclosure: companies that disclose ESG data at one site may show much weaker disclosure at other sites. Even for basic data such as workforce composition, site-level disclosure practices can vary widely within a company.

The results also show that, when public reporting does happen, it reveals large gaps between companies' actions on ESG issues and the expectations of project-affected stakeholders. The weakest results of the study were those relating to working conditions, with the three worker-related indicators being among the four lowest-scoring ones in the study. For example, many companies are not able to demonstrate that they ensure the provision of appropriate safety equipment for all workers, or that they have effective grievance mechanisms in place for their workforce.

The study provides additional evidence for another finding from the RMI 2018 report: external requirements improve public reporting. Indicators on issues for which mandatory reporting mechanisms have been set by producing country governments generally show stronger performances on ESG data disclosure.

The study also revealed that stronger site-level ESG disclosure is readily within the reach of many of these small and mid-tier companies. In some cases, companies already collect and collate some site-level data (as evidenced by their publication of aggregated company-level data), so disclosure of site-specific data would entail little additional effort. More generally, the results suggest that among the assessed companies, neither the location nor the size of the mine-site is necessarily a determining factor in the level of ESG disclosure. The best-performing (strongest-disclosing) site is in Burkina Faso and is not the largest, by any measure (be it size of workforce or value or volume of production). In addition, the study revealed some encouraging cases of leading practice in, for example, systematically engaging with mining-affected communities on the results of environmental impact assessments or on the testing of emergency response plans.

² Interestingly however, the best-performing company (with strongest disclosure of ESG issues) does not produce a Sustainability report.

The report

This report includes the full set of results by mine-site, as well as some contextual information on the companies. The report also details the methodology and the specific questions relating to the indicators.

All documents sourced during the study and the detailed scoring framework used in the assessment are available online at: mine-site-study-2019.responsibleminingfoundation.org

Geographic and company scope



Companies assessed

Alamos Gold
Avesoro Resources
Centerra Gold
Endeavour Mining
Iamgold
Imperial Metals
Kirkland Lake Gold
Komet Resources
New Gold
Roxgold
Semafo
Wesdome Gold Mines



● Mine sites assessed in the study

Indicators

LEGEND

No. | Topic

Indicator

- Three elements by which the indicator is assessed.

01 | Community engagement

The operating company engages with project-affected communities on matters that may impact them.

- The operating company implements ongoing engagement processes with project-affected communities on matters that may impact them.
- The community engagement processes include specific actions to engage with women.
- The operating company monitors community satisfaction with the outcomes of its engagement processes.

02 | Local employment

The operating company publicly discloses data on the composition of its workforce.

- The operating company publicly discloses data on its workforce composition, showing numbers of expatriates and nationals.
- The workforce data show numbers of employees and contract workers.
- The workforce data also show numbers of workers from local communities (or from local municipalities/districts) among employees and contract workers.

03 | Local procurement

The operating company publicly discloses data on local procurement and supports local suppliers.

- The operating company publicly discloses data on its procurement, showing proportions and amounts spent on national and local suppliers.
- The operating company provides support to local suppliers in navigating the tender process and responding to tenders.
- This support includes specific actions to support women entrepreneurs.



04 | Community grievance mechanism

The operating company publicly discloses data on its community grievance mechanism and takes actions to provide appropriate remedy.

- The operating company publicly discloses data on its community grievance mechanism, showing the number and nature of grievances filed by project-affected communities.
 - The operating company takes actions in response to the grievances filed, to provide appropriate remedy.
 - The operating company tracks the satisfaction of claimants with the remedies provided.
-

05 | Living wage

The operating company ensures that the wages of all its employees and contract workers at least match fair living wage levels.

- The operating company publicly discloses data on the wages of its employees, showing they meet or exceed fair living wage levels applicable to the area of the mine site (or the legal minimum wage if higher).
 - The operating company discloses this data specifically for contract workers as well as employees.
 - The operating company discloses this data specifically for women workers as well as men.
-


06 | Workers' safety

The operating company ensures its employees and contract workers are provided with appropriate safety equipment.

- The operating company identifies appropriate safety equipment for all workers.
 - The operating company ensures the provision of appropriate safety equipment for all workers.
 - The operating company ensures provision of suitable PPE for women workers.
-

07 | Worker grievance mechanism

The operating company publicly discloses data on its worker grievance mechanism and takes actions to provide appropriate remedy.

- The operating company publicly discloses data on its worker grievance mechanism, showing the number and nature of grievances filed by workers.
 - The operating company takes actions in response to the grievances filed, to provide appropriate remedy.
 - The operating company tracks the satisfaction of claimants with the remedies provided.
- 

08 | Indigenous Peoples

The operating company consults with Indigenous Peoples potentially affected by its activities, and respects their right to Free, Prior and Informed Consent on the use of their land.

- The operating company identifies Indigenous Peoples potentially affected by its activities.
 - The operating company implements consultation processes for Indigenous Peoples on the use of their land.
 - The operating company publicly reports on whether Free, Prior and Informed Consent was obtained, and on the subsequent actions taken on this basis.
-

09 | Artisanal and small-scale mining

The operating company engages with artisanal and small-scale mining (ASM) operations in and around its mine site.

- The operating company identifies any ASM operations in and around its mine site.
 - The operating company engages with ASM miners to identify opportunities for constructive collaboration.
 - These engagement activities include women working in these operations.
-

10 | Environmental impact assessments

The operating company publicly discloses assessments of its environmental impacts, and discusses the results of these assessments with project-affected stakeholders.

- The operating company publicly discloses assessments of its environmental impacts, including its impacts on biodiversity.
- These assessments are regularly updated, at least every two years.
- The operating company discusses with project-affected stakeholders the results of these assessments.

11 | Water quality

The operating company publicly discloses water quality monitoring data, discusses monitoring results with project-affected stakeholders and takes actions to improve water quality in its catchments or regional basins.

- The operating company publicly discloses data on water quality in its catchments or regional basins, showing the data disaggregated by measuring point, and against applicable limit values.
 - The operating company discusses with project-affected stakeholders the results of its water quality monitoring.
 - The operating company collaborates with project-affected stakeholders in monitoring the actions taken to improve water quality in its catchments or regional basins.
-

12 | Air quality

The operating company publicly discloses air quality monitoring data, discusses monitoring results with project-affected stakeholders and takes actions to improve air quality in and around the mine site.

- The operating company publicly discloses data on air quality in and around the mine site, showing concentrations of particulate matter and toxic gases, against applicable limit values.
 - The operating company discusses with project-affected stakeholders the results of its air quality monitoring.
 - The operating company collaborates with project-affected stakeholders in monitoring the actions taken to improve air quality in and around the mine site.
-

13 | Progressive rehabilitation

The operating company publicly discloses and implements a rehabilitation and closure plan that includes plans for ongoing progressive rehabilitation.

- The operating company publicly discloses its rehabilitation and closure plan, that includes plans for ongoing progressive rehabilitation.
- The progressive mine rehabilitation and closure plan is costed.
- The operating company tracks its progress on its rehabilitation and closure plan.

14 | **Post-closure viability for communities**

The operating company develops plans to ensure that project-affected communities remain viable after mine closure.

- The operating company develops plans to ensure post-closure socio-economic viability for project-affected communities.
 - These plans include post-mining land-use opportunities.
 - These plans take into account the goals and views of project-affected communities.
-

15 | **Emergency preparedness and response plans**

The operating company publicly discloses and tests its emergency preparedness and response plans, including for risks associated with tailings dams and other waste facilities.

- The operating company publicly discloses its emergency preparedness and response plans.
- The plans include risks associated with tailings dams and other waste facilities.
- The operating company includes project-affected stakeholders in testing these response plans.

Findings and overall results

Key findings

I | Lack of site-level ESG disclosure

Overall, the scores on site-level disclosure of ESG data are low, with an average score of 11% and only three of the 31 mine sites scoring more than 25%. This lack of site-level disclosure by small and mid-tier companies appears to be largely the result of capacity constraints, non-prioritisation of ESG reporting, and concerns about confidentiality.³ The study also found a lack of consistent, company-wide approaches to site-level disclosure: companies that disclose ESG data at one site may show much weaker disclosure at other sites. Even for basic data such as workforce composition, site-level disclosure practices vary widely within a company.

II | Stronger ESG disclosure within the reach of many companies

Better disclosure of ESG data is clearly achievable for many small and mid-tier companies. Some of the companies in the study already collect and collate some site-level data, as evidenced by their publication of aggregated company-level data and by the fact that some companies provided to RMF much more site-level data for the study than was previously available in the public domain (on the understanding it would be made publicly available by RMF). Systematic and pro-active data sharing can be achieved without much additional effort, especially as digital data systems are increasingly being used in the industry.

³ One company executive explained their decision not to provide ESG data for this study by the fact that 'I can't ask the site folks to stop doing their real jobs to complete this.' Another company stressed that they were in the process of ramping up their ESG reporting, as part of a drive to strengthen and demonstrate their ESG performance. Other companies revealed that relevant data were available but 'for internal use' only.

III | Disclosed data not aligned with open data principles

Where companies do disclose site-level ESG data, the data are often presented in ways that reduce their usefulness to other stakeholders. This includes, for example: (1) figures expressed only as percentages without absolute numbers; or (2) environmental data shared without contextual information, e.g. on incidents where pollution levels exceeded limit values. Companies can better address the data needs of stakeholders such as investors, governments and civil society not necessarily by increasing their data preparation and reporting efforts, but by ensuring that the data they do report is in line with open data principles.⁴ This would entail, for example, providing data in a timely manner, and in formats that allow stakeholders to understand and use the information to assess company practices and performance.

IV | External requirements foster public reporting

In addition to the mandatory reporting requirements for Canadian-listed companies, regulatory reporting frameworks are also set by several of the producing countries included in this study, relating to information on, for example, impact assessments or closure plans. In general, indicators that cover issues for which reporting requirements are in place show stronger and more consistent results. Similarly, sites that are subject to requests from shareholders or investors to align their practices with international initiatives or reporting standards also tend to show stronger ESG disclosure. It is worth noting that the Toronto Stock Exchange does not have any listing requirements in terms of ESG disclosure by mining companies beyond the standard Canadian regulations, though it does provide non-binding recommendations.⁵

⁴ See www.opendatacharter.net/principles/

⁵ See www.tsx.com/resource/en/73

Observations

This section highlights some of the ESG issues on which disclosure was found to be weak. By strengthening their public disclosure of data on these issues, companies can enable more meaningful engagement with mining-affected communities and other stakeholders.

Companies also stand to gain from better knowledge management of these issues as they will be better able to learn about, and demonstrate, their performance on these issues.

In many cases, company actions to address the issues was also found to be below the expectations of mining-affected stakeholders. Companies can show clear leadership and strengthen their social licence to operate by demonstrating more systematic action to avoid adverse impacts and leave a positive legacy in their areas of operation.

Community engagement

While 15 of the 31 mine sites assessed show some level of community engagement processes (e.g., public meetings, committees, presentations or newsletters), these are generally limited to information-sharing rather than more meaningful and collaborative approaches. A few companies do show that they monitor community satisfaction on the outcomes of their engagement processes. However, there is little evidence of companies working collaboratively with communities on decision-making, monitoring or reviews associated with these engagement processes. Companies that do develop inclusive, collaborative mechanisms with affected communities can help ensure their operations better address the needs and expectations of these stakeholders.

Women

Some of the lowest-scoring issues in the study relate to companies demonstrating that they have taken specific measures to ensure women are included in engagement and support activities. For example, only one mine site reports on action taken to support women entrepreneurs. Similarly, there is very little reporting on efforts to meet the specific safety needs of female workers. Companies that can demonstrate they have taken efforts to include women in a more collaborative way and address their needs, are better able to show how they are addressing the serious mining-related risks and disadvantages faced by women.

Fatality reporting

By the assessment cut-off date of end-November 2018, only eight of the 31 mine sites had published recent (2017) data on mining worker fatalities, while an additional five mine sites had reported only 2016 data. For the eight sites that publicly disclosed recent worker fatalities, only three sites explicitly state that their fatality data cover deaths of contract workers as well



as employees. This is particularly important, given that contract workers often make up a large share of mining company workforces (between 17% and 74% for the six companies that make this information available) and contract workers often face greater risks of workplace accidents than regular employees. Systematic reporting of all mining worker fatalities can enable companies to demonstrate that their commitments to health and safety and to eliminate workplace fatalities translate into real actions and continuous improvement on the ground.

Emergency response plans

Only five of the 31 mine sites disclose up-to-date emergency preparedness and response plans. And none of these sites demonstrate that they involve local communities in the testing of their response plans. By disclosing these plans, including actions to take in the event of tailings storage leak or failure, companies can help to mitigate adverse impacts when disasters happen, and ultimately save lives.

Worker grievance mechanisms

Information on worker grievance mechanisms is very scarce. Only one company discloses the number of grievances filed annually by its workers through formal grievance mechanisms. In order to align with the ILO Recommendation R130 on Examination of Grievances, mining companies need to ensure and demonstrate that they respect the right of workers to submit their grievances and have them examined and settled. Publicly reporting on how worker grievances are addressed and how remedy is provided can also help build workers' confidence in these mechanisms.⁶

Community grievance mechanisms

Information is also often lacking on community grievance mechanisms. Only two of the 31 mine sites regularly publish the number and nature of the grievances filed. Only four sites give any details on the actions they have taken to provide remedy and only one mine site discloses information about how it tracks the satisfaction of the claimants. In order to align with the UN Guiding Principles on Business and Human Rights, companies need to identify adverse impacts and seek to remediate them. By tracking the use and effectiveness of their grievance mechanisms and sharing this information with the affected stakeholders, companies can not only demonstrate their willingness to acknowledge and address their potential adverse impacts but can also identify systemic risk and adapt their practices accordingly.

⁶ See for example, www.shiftproject.org/media/resources/docs/Shift-Canadian-Mining-Report.pdf.

Living wage

While several companies claim to pay above the living wage, none of the twelve companies show evidence that this has been verified. By benchmarking their wages to contextualised living wages (based either on established living wage frameworks, such as in Canada, or in-country cost-of-living estimates where such frameworks do not exist), companies can demonstrate that they provide workers with the dignity and means to meet their basic needs and participate in society.

Planning for post-closure socio-economic viability

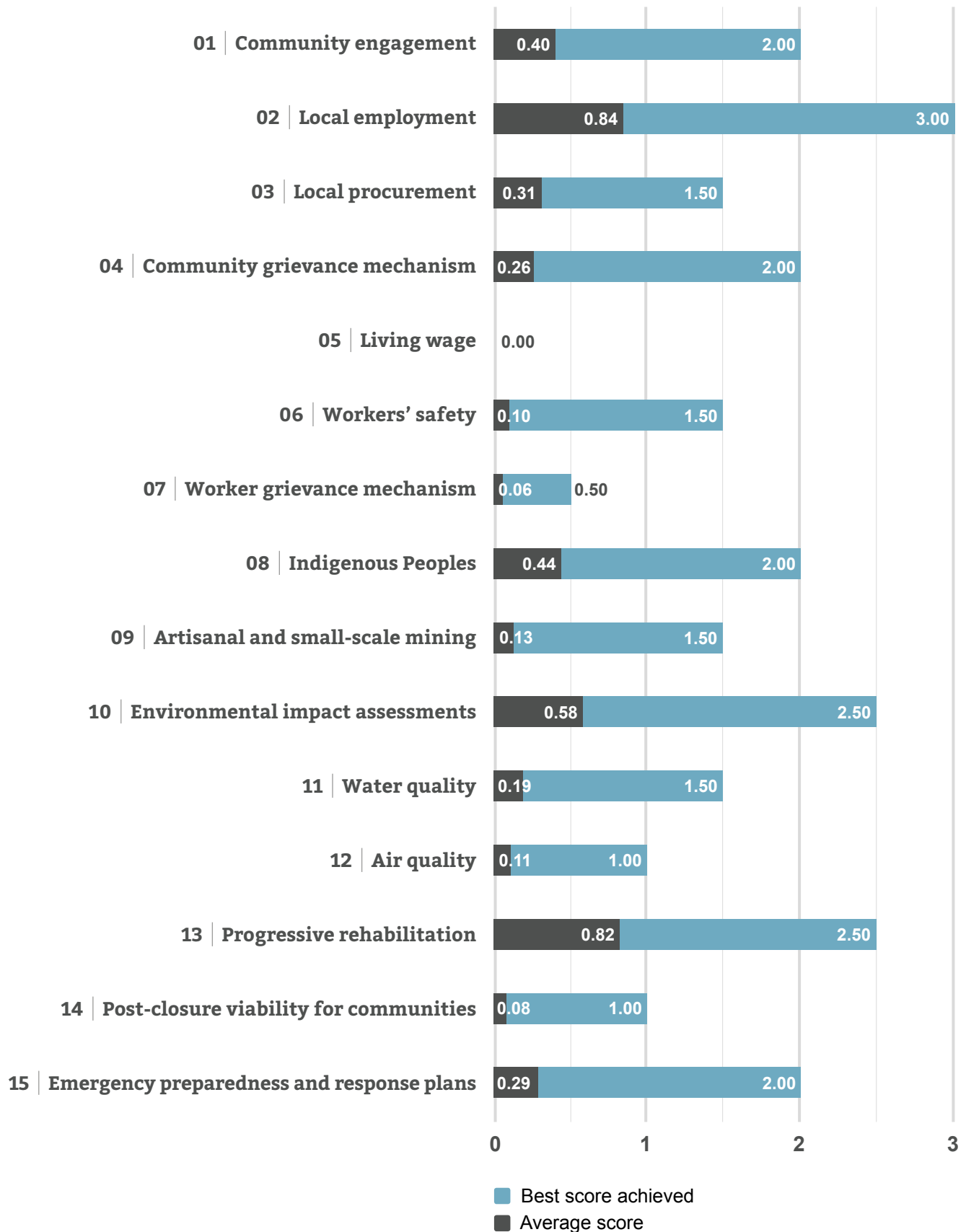
It is encouraging to note that 20 of the 31 mine sites have published information on their mine rehabilitation and closure plan. These plans reveal that most companies are making provisions to limit their environmental impacts and reduce the environmental liability of their mine sites at closure. However, fewer companies are addressing post-closure social issues. Only three plans include measures to ensure the post-closure viability of communities, and only one site includes in its objectives returning the land to suitable post-mining land-use. Beyond environmental and landscape rehabilitation, a positive legacy necessitates measures to help ensure that project-affected communities have sustainable livelihoods after mine closure.

Basic company commitments

While corporate-level commitments are not included in the scoring, the study checked for the existence of basic policy documents on bribery and corruption, human rights, and workers' rights. The results were mixed. While nine of the twelve companies have published formal policies committing to prevent all direct and indirect forms of bribery and corruption, only a few companies have committed to respect human rights and when these commitments have been formalised they do not explicitly reference the UN Guiding Principles on Business and Human Rights.⁷ Similarly, no companies have formally committed to respect fundamental workers' rights, including freedom of association and the right to organise, in line with the ILO labour standards. By integrating strong commitments into core business strategy and by acknowledging internationally-recognised frameworks and standards, mining companies can demonstrate their willingness to develop and implement ethical business practices.

⁷ See www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Overall results



This section summarises the overall results for all indicators in the study.

01 | Community engagement

While fifteen mine sites show evidence of implementing engagement processes with project-affected communities on matters that may impact them, only five sites demonstrate ongoing engagement processes, beyond ad-hoc events. Two mine sites share information on specific actions to engage with women within the communities, even though details are limited to isolated cases and do not reflect a systematic inclusive approach. Three mine sites share information and survey templates demonstrating the existence of community satisfaction monitoring regarding the outcomes of their engagement processes, but none of these sites publicly share the results of this monitoring.

02 | Local employment

This indicator, which assesses how workforce data are publicly disclosed, is the best-scoring indicator in the study. Twelve mine sites provide employment figures for expatriates and nationals, although only two have shared absolute numbers for 2017 or later. Nine mine sites show absolute numbers of employees and contract workers, with data from 2017 or later, and five others show numbers that are either from 2016 or earlier, or expressed only as percentages. Twelve mine sites also show numbers of local community workers among their workforce, although only three sites disaggregate this number between employees and contract workers. Two mine sites stand out by also disaggregating all these data by gender and by levels of qualification.

03 | Local procurement

Fourteen mine sites publicly disclose the amounts they spent on national suppliers, but only six of them also share data on local suppliers. Only three mine sites show this data as proportions of their total procurement. Only one mine site shows practical examples of actions to support local suppliers, with specific actions towards women, yet without demonstrating an ongoing and systematic approach. Two mine sites go beyond the requirements of this indicator and also show amounts spent on suppliers from local Indigenous Peoples groups.



04 | Community grievance mechanism

Only two mine sites report the number and nature of the grievances filed by communities through their formal grievance mechanisms in 2017 or later, while seven other sites share earlier or incomplete data. Only four mine sites show that they took actions in response to the grievances filed, but none could demonstrate that this was done systematically and for the year 2017 or later. And no mine sites report on tracking the satisfaction of claimants once their cases have been settled, although one mine site shows that such tracking material does exist.

05 | Living wage

None of the mine sites publicly track their performance in meeting or exceeding living wage standards. Several companies made statements of commitment in relation to legal minimum wage or national standards in the sector, but without reference to a living wage.

06 | Workers' safety

Only three mine sites demonstrate they have undergone a comprehensive process for the identification of appropriate safety equipment required for all workers, but only one site shows that this process systematically covers all departments and activities. The latter is also the only mine site showing evidence that it provides safety equipment to its workers. One mine site discloses information demonstrating that specific women-adapted PPE are identified and potentially available.

07 | Worker grievance mechanism

Only four mine sites report the number of grievances filed by workers through a formal grievance mechanism, but none of these sites give details on the nature of these grievances. And no mine sites report on the actions taken in response nor the tracking of satisfaction of the claimants once their cases have been settled.



08 | Indigenous Peoples

Twelve of the thirteen mine sites located in Canada have publicly identified the different Indigenous Peoples affected by their activities. Outside Canada, one mine site was granted an exception for this indicator (see Methodology section) as it is able to demonstrate that it had conducted an identification process, which concluded that no Indigenous Peoples would be potentially affected. Seven mine sites share information about the consultation processes they implement for Indigenous Peoples. However, these are often limited to benefit agreements and do not seek to systematically obtain the free, prior and informed consent of Indigenous Peoples on the use of their land.

09 | Artisanal and small-scale mining

Only one mine site discloses comprehensive mapping and clear identification of ASM operations in and around its site, while four others disclose limited information about the presence of ASM in their areas. Only two mine sites mention protocols or consultations held to identify opportunities for constructive collaboration with ASM operators, but with very limited details. No mine sites demonstrate that they take actions to include women working in ASM in their engagement processes. Eight mine sites have clearly identified that ASM was not relevant in their context and were granted an exception to this indicator (see Methodology section).

10 | Environmental impact assessments

Eight mine sites publicly disclose environmental impact assessments, and four others disclose at least parts or summaries. Eight of these twelve sites have published updates, although none of them share comprehensive updates on a regular basis. Four mine sites stand out by demonstrating that affected communities and stakeholders are involved in discussion on the results of their environmental impact assessments.

11 | Water quality

Only two mine sites disclose relevant water quality monitoring data disaggregated by measuring point, and against applicable limit values. Most mine sites publish only narrative statements on water, or disclose only average water quality data aggregated at the company-level, or without contextual references such as applicable limit values that allow results to be understood, used and compared. Only one mine site demonstrates its water quality monitoring results are discussed with project-affected stakeholders on a regular and systematic basis. None of the mine sites show that they involve project-affected stakeholders collaboratively in monitoring the actions taken to improve water quality in their catchments or regional basins.

12 | Air quality

Very few mine sites publicly disclose disaggregated air quality data, with only two mine sites showing concentrations of particulate matter and toxic gases at their measuring points, and against applicable limit values. Three other mine sites report on air quality, but only share outdated or incomplete data, without showing how the air quality results compare to applicable limit values.

13 | Progressive rehabilitation

This indicator shows the second-best performance levels in the study. Ten mine sites disclose their mine rehabilitation plans, although one plan does not make provision for progressive rehabilitation along the life of the mine. Seventeen mine sites disclose information about the estimated rehabilitation costs, with variable levels of details, especially on the financial provision secured. Twelve mine sites provide evidence of tracking their progressive rehabilitation, five of them demonstrating up-to-date, detailed and comprehensive tracking.

14 | Post-closure viability for communities

Only three mine sites show examples of actions aimed at ensuring post-closure socio-economic viability for project-affected communities, yet without disclosing comprehensive plans that would demonstrate the inclusion of this aspect in their broader closure strategy. Among these three sites, only one site mentions post-mining land-use opportunities for communities. One site has set up a collaborative platform to take into account the goals and views of the communities in this regard.

15 | Emergency preparedness and response plans

Three mine sites publicly disclose their emergency preparedness and response plans, which include risks associated with tailings dams and other waste facilities. Another mine site shares only the response plan in the event of a tailings dam failure, and another has not updated its plan to correspond to its current lifecycle phase. Only one site reports on the inclusion of project-affected stakeholders in testing its emergency response plans, yet does not demonstrate implementation of actual collaborative testing.

Mine-site results

How to read the results

This section presents the results for each of the 31 mine sites assessed, as well as contextual information on each of the twelve companies. Companies and their mine sites, are presented in alphabetical order.

Company contextual pages

Worldmap

Location of the company's operating mine sites, which are all assessed in the study. Note that any closed mine sites (i.e. sites under care & maintenance, closure or post-closure management) are not assessed in this study.

Contextual information

- Home country
- Stock exchange listings
- Pre-tax revenues
- Production
- TSM status
- Number of employees
- Number of workers
- Company-reported mining worker fatalities

Company X

● Mine sites in operation

HOME COUNTRY	Country X	TSM STATUS	Not participating / Participating
STOCK EXCHANGE LISTINGS	TSX: X NYSE: X	NUMBER OF EMPLOYEES	2017 X,XXX
PRE-TAX REVENUES	2017 XXX.X M USD	NUMBER OF WORKERS	2017 X,XXX
PRODUCTION (2017)	Gold: XX,XXX oz Copper: XX,XXX klbs Silver: XX,XXX oz	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported

Main shareholders (as of 01/05/2018)

- Shareholder A (Country): 13.72%
- Shareholder B (Country): 12.57%
- Shareholder C (Country): 4.19 %

Corporate policy documents

☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.

☒ Committing to prevent all direct and indirect forms of bribery and corruption.

☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

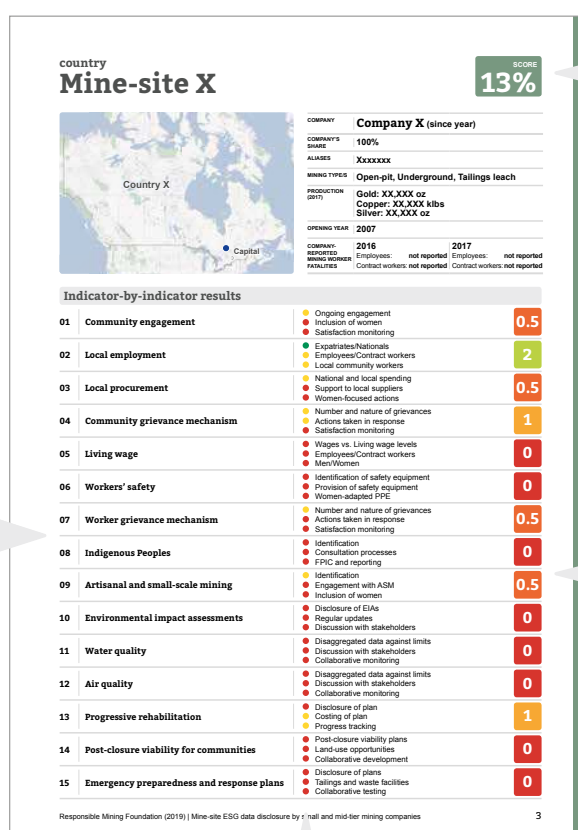
Main shareholders

Corporate policy documents

Information is also provided on basic corporate policy documents on anti-bribery and corruption, human rights and workers' rights.

- ☒ The company has made publicly available a policy document that is in line with internationally-recognised standards.
- ☐ No evidence was found of such a document being available in the public domain.

Mine-site results pages



The 15 indicators

Mine-site-level scores

With 15 indicators, the maximum overall score for a mine site is 45. The overall mine site score is then expressed as a rounded percentage of the maximum achievable score, taking into account any exceptions granted to a mine site (see Methodology section).

Indicator-level scores

Each indicator-level score is the sum of the scores for the three elements of the indicator.

The indicator-level scores, which can range from 0 to 3, are shown with the following colour-coding:



Exception:
not included in the scoring

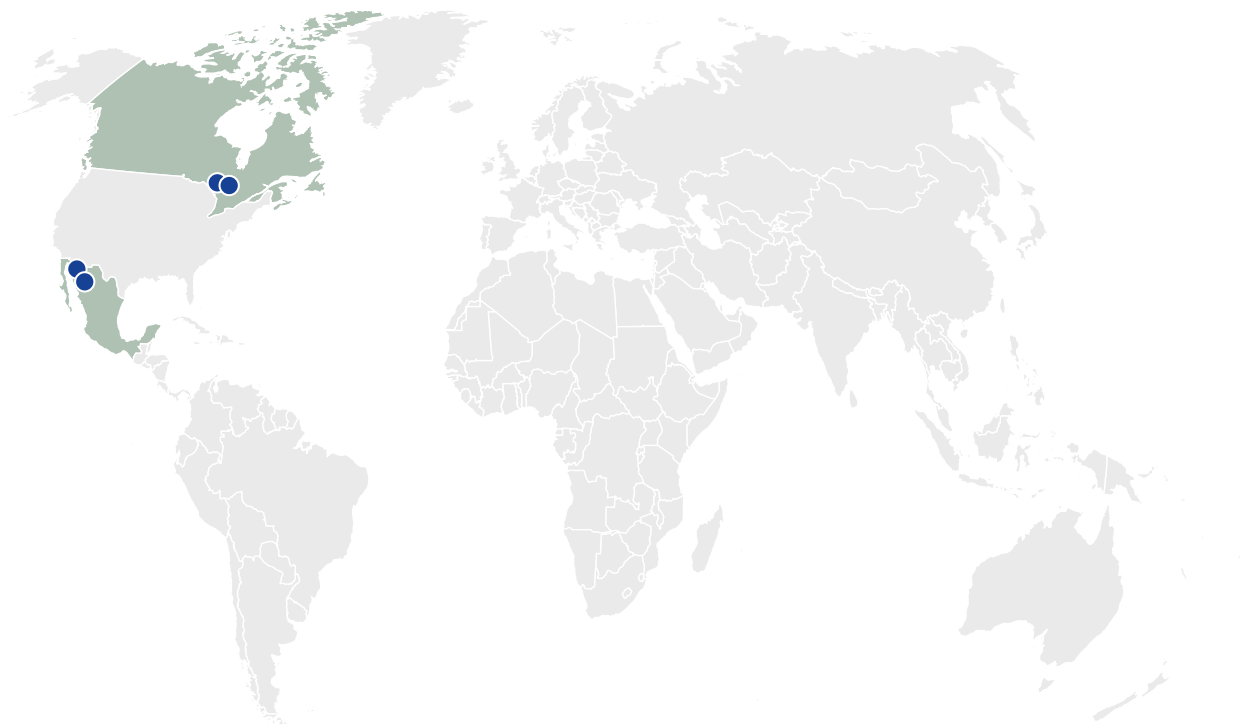
Element-level scores

The element-level scores are in the range 0-to-1, making three the maximum score for each indicator. (See Methodology section for details). Scores for each element are shown using the following colour-code system:

- 0 point
- 0.5 point
- 1 point
- Exception granted: not included in the scoring

A full score (● 1 point) is assigned in cases where the company is able to demonstrate that it fully addresses the issue(s) articulated in the element. A partial score (● 0.5 point) is assigned when the evidence provided by the company partially addresses the issue(s) articulated in the element.

Alamos Gold



● Mine sites in operation

HOME COUNTRY	Canada			TSM STATUS	Not participating		
STOCK EXCHANGE LISTINGS	TSX: AGI NYSE: AGI			NUMBER OF EMPLOYEES	2017 1,724		
PRE-TAX REVENUES	2017 542.8M USD			NUMBER OF WORKERS	2017 2,115		
PRODUCTION (2017)	Gold: 429,400 oz			COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported	

Main shareholders *(as of 31/12/2017)*

- BlackRock Inc. (USA): 13.72%
- Franklin Templeton Investments (USA): 12.57%

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Mexico

El Chanate

SCORE
5%



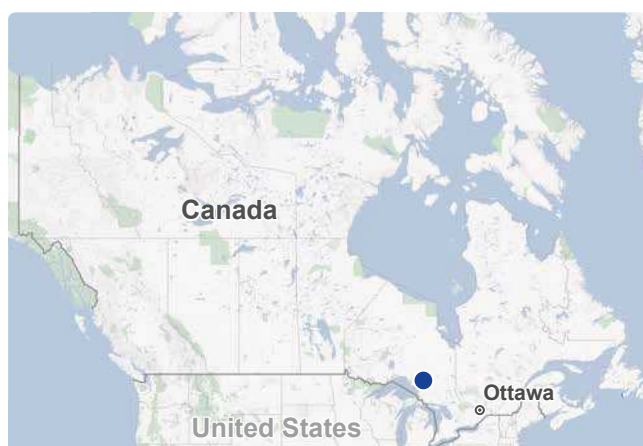
COMPANY	Alamos Gold (since 2011)	
COMPANY'S SHARE	100%	
ALIASES	Minera Santa Rita	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 60,400 oz	
OPENING YEAR	2007	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	1
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	1
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	0

Canada Island Gold

SCORE
4%



COMPANY	Alamos Gold (since 2017)	
COMPANY'S SHARE	100%	
ALIASES	Argonaut, Edwards, Ego, Goudreau, Goudreau Lake, Kremzar, Lochalsh, Salo	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 98,400 oz	
OPENING YEAR	2007	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Mexico

Mulatos

SCORE
8%



COMPANY	Alamos Gold (since 2003)		
COMPANY'S SHARE	100%		
ALIASES	Cerro Pelon, La Yaqui, El Realito, El Carricito, El Halcon, Las Carboneras, El Jaspe, Puebla, Los Bajios, La Dura, La Salamandra		
MINING TYPE/S	Open-pit, Underground		
PRODUCTION (2017)	Gold: 160,000 oz		
OPENING YEAR	2006		
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017	
	Employees: not reported	Employees: not reported	
	Contract workers: not reported	Contract workers: not reported	

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0.5
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	1.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	1.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Canada Young-Davidson

SCORE
5%

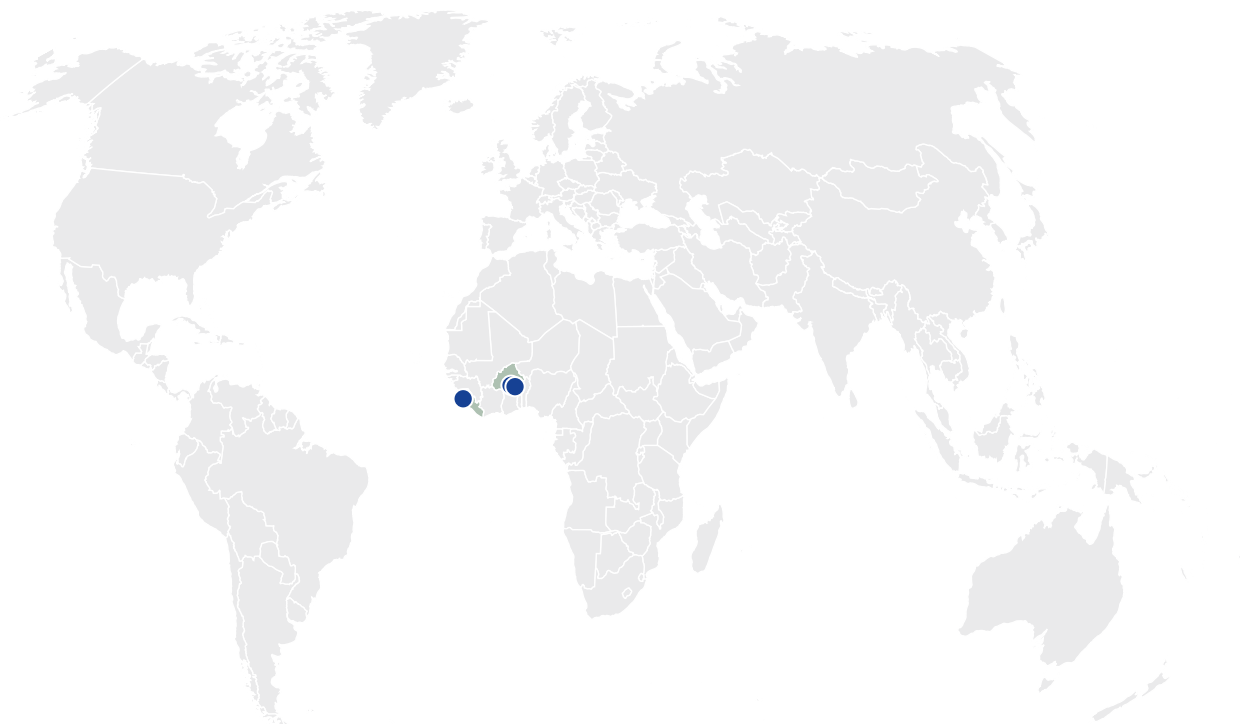


COMPANY	Alamos Gold (since 2011)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 200,000 oz	
OPENING YEAR	2012	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0.5
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	1
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Avesoro Resources



● Mine sites in operation

HOME COUNTRY	Canada	TSM STATUS	Not participating
STOCK EXCHANGE LISTINGS	TSX: ASO AIM: ASO	NUMBER OF EMPLOYEES	Not reported
PRE-TAX REVENUES	2017 97.8 M USD	NUMBER OF WORKERS	Not reported
PRODUCTION (2017)	Gold: 79,024 oz	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported
			2017 Employees: not reported Contract workers: not reported

Main shareholders *(as of 27/09/2018)*

- Avesoro Jersey Ltd. (Jersey): 72.9 %
- Lombard Odier Asset Management (Switzerland): 5.03 %
- Richard Griffiths and controlled undertakings (Jersey): 4.19 %

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☐ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Burkina Faso

Balogo

SCORE
0%



COMPANY	Avesoro Resources (since 2017)	
COMPANY'S SHARE	90%	
ALIASES	-	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 28,845 oz <i>Production aggregated for Youga and Balogo</i>	
OPENING YEAR	2017	
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017
	Employees: not reported Contract workers: not reported	Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	0

New Liberty

9%



COMPANY	Avesoro Resources (since 2011)	
COMPANY'S SHARE	90%	
ALIASES	-	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 76,179 oz	
OPENING YEAR	2016	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	1
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	1
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	1
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	1

Burkina Faso

Youga

SCORE
0%

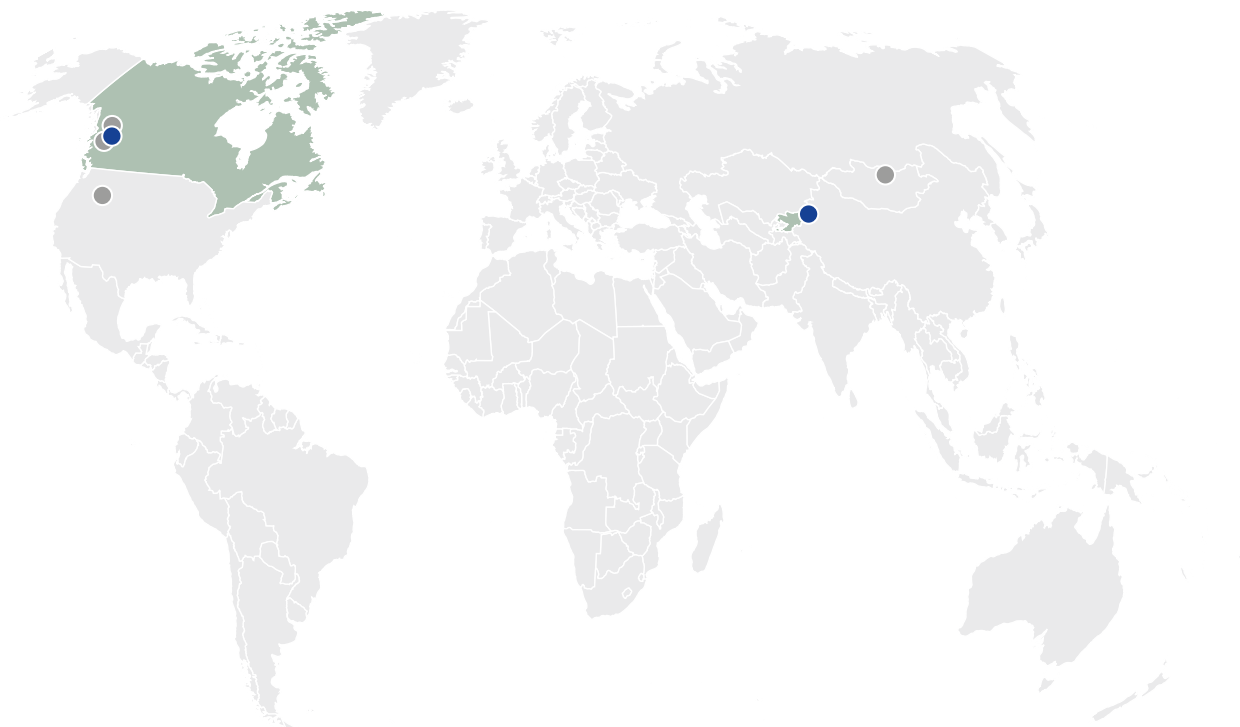


COMPANY	Avesoro Resources (since 2017)	
COMPANY'S SHARE	90%	
ALIASES	-	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 28,845 oz <i>Production aggregated for Youga and Balogo</i>	
OPENING YEAR	2008	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	0

Centerra Gold



- Mine sites in operation
- Closed mine sites (under care & maintenance, closure or post-closure management) – not assessed

HOME COUNTRY	Canada	TSM STATUS	Not participating
STOCK EXCHANGE LISTINGS	TSX: CG	NUMBER OF EMPLOYEES	2017 3,281
PRE-TAX REVENUES	2017 1,199.0 M USD	NUMBER OF WORKERS	2017 4,240
PRODUCTION (2017)	Gold: 785,316 oz Copper: 53,596 klbs	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: 1 Contract workers: not reported 2017 Workers (not defined): 1

Main shareholders (as of 01/09/2018)

- Kyrgyzaltyn JSC (Kyrgyz Republic): 27 %
- BlackRock Inc. (USA): 12.03 %
- Van Eck Associates Corporation (USA): 8.64 %
- Paulson & Co. Inc. (USA): 7.8 %
- Dimensional Fund Advisors LP (USA): 3.32 %
- Franklin Templeton Investments (USA): 2.22 %
- The Vanguard Group Inc. (USA): 1.57 %

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Kyrgyz Republic Kumtor

SCORE
14%



COMPANY	Centerra Gold (since 2004)		
COMPANY'S SHARE	100%		
ALIASES	-		
MINING TYPE/S	Open-pit		
PRODUCTION (2017)	Gold: 562,749 oz		
OPENING YEAR	1997		
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: 1 Contract workers: not reported	2017 Workers (not defined): 1	1

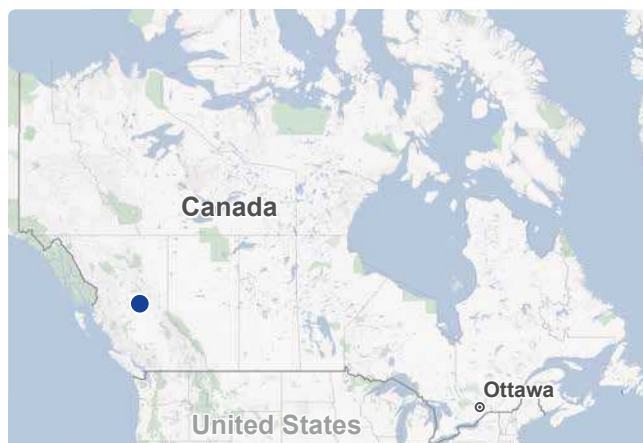
Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1.5
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	1
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	1
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0.5

Canada

Mount Milligan

SCORE
23%

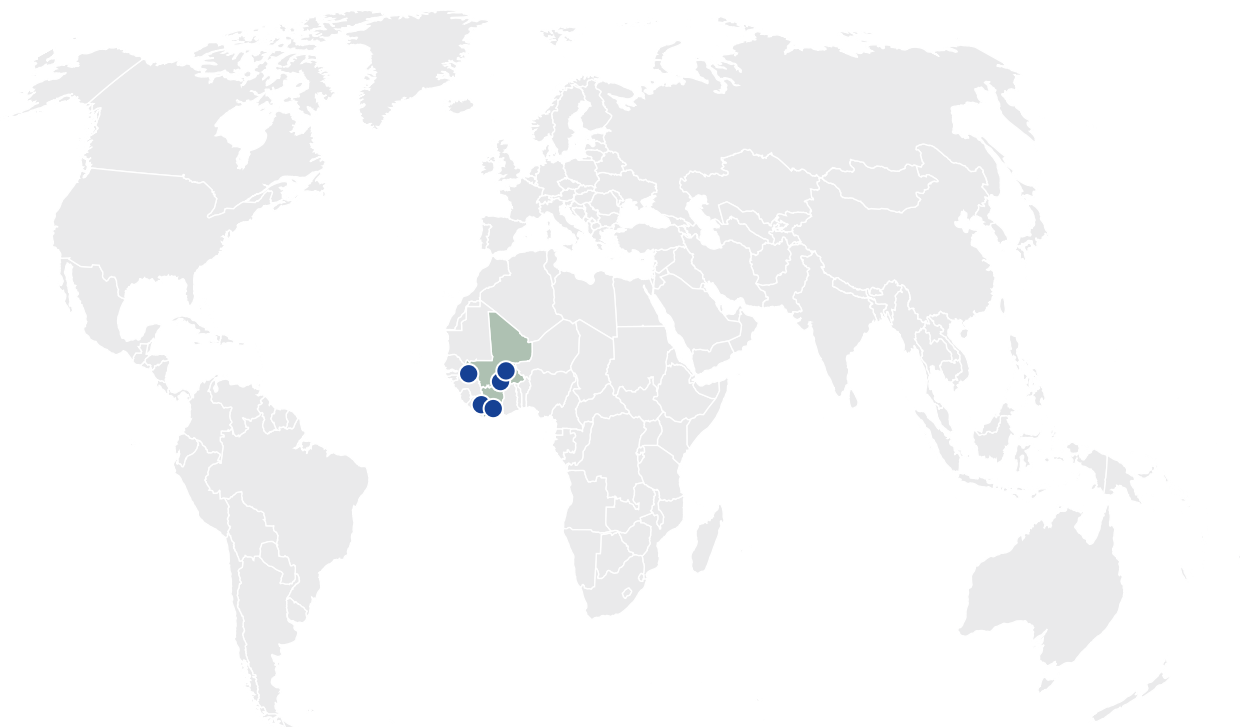


COMPANY	Centerra Gold (since 2016)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Copper: 53,596 klbs Gold: 227,567 oz	
OPENING YEAR	2014	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: 0 Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	1
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	2.5
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	1.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	2.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	1.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	1
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Endeavour Mining



● Mine sites in operation

HOME COUNTRY	Cayman Islands			TSM STATUS	Not participating		
STOCK EXCHANGE LISTINGS	TSX: EDV			NUMBER OF EMPLOYEES	2017 4,152		
PRE-TAX REVENUES	2017 652.1 M USD			NUMBER OF WORKERS	2017 7,945		
PRODUCTION (2017)	Gold: 662,569 oz			COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers (not defined):	2017 Workers (employees + contract workers):	0

Main shareholders (as of 01/11/2018)

- La Mancha Holding S.A.R.L. (Luxembourg): 30 %
- Van Eck Associates Corporation (USA): 9.5 %
- BlackRock Investment Management Ltd. (UK): 8.5 %
- M&G Investment Management Ltd. (UK): 4.1 %
- Elliott Management Corporation (USA): 3.8 %
- OppenheimerFunds Inc. (USA): 3.7 %
- RBC Global Asset Management Inc. (Canada): 2.1 %
- Fiera Capital Corporation (Canada): 1.9 %
- Ruffer LLP (UK): 1.6 %
- The Vanguard Group Inc. (USA): 1.4 %

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Côte d'Ivoire

Agbaou

SCORE
7%



COMPANY	Endeavour Mining (since 2012)		
COMPANY'S SHARE	85%		
ALIASES	-		
MINING TYPE/S	Open-pit		
PRODUCTION (2017)	Gold: 177,191 oz		
OPENING YEAR	2014		
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers (not defined):	2017 Workers (employees + contract workers):	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	2
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Burkina Faso

Houndé

SCORE
6%



COMPANY	Endeavour Mining (since 2012)		
COMPANY'S SHARE	90%		
ALIASES	-		
MINING TYPE/S	Open-pit		
PRODUCTION (2017)	Gold: 68,754 oz		
OPENING YEAR	2017		
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers (not defined):	2017 Workers (employees + contract workers):	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0.5
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0



COMPANY	Endeavour Mining (since 2015)	
COMPANY'S SHARE	80%	
ALIASES	SMI	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 59,026 oz	
OPENING YEAR	1991	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers (not defined): 0	2017 Workers (employees + contract workers): 0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	2
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Burkina Faso Karma

SCORE
6%



COMPANY	Endeavour Mining (since 2016)		
COMPANY'S SHARE	90%		
ALIASES	Riverstone Karma		
MINING TYPE/S	Open-pit		
PRODUCTION (2017)	Gold: 97,982 oz		
OPENING YEAR	2016		
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers (not defined):	2017 Workers (employees + contract workers):	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Mali

Tabakoto

SCORE
3%

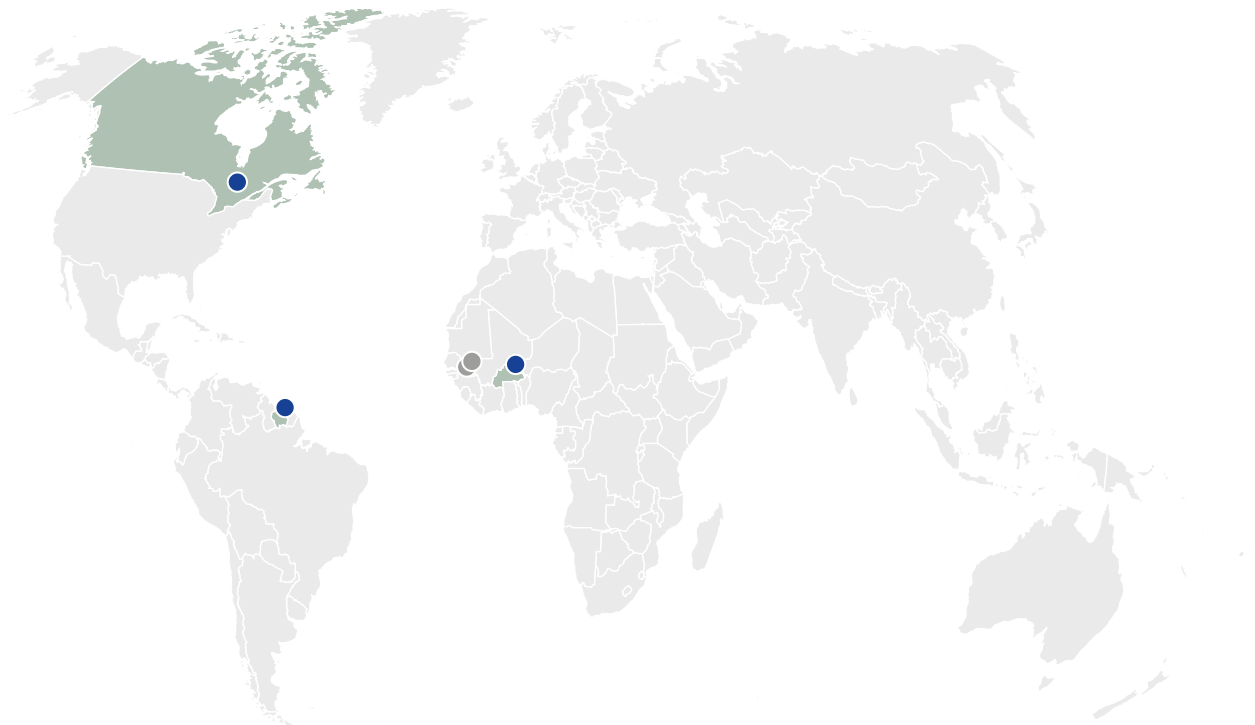


COMPANY	Endeavour Mining (since 2012)		
COMPANY'S SHARE	80%		
ALIASES	-		
MINING TYPE/S	Open-pit, Underground		
PRODUCTION (2017)	Gold: 143,995 oz		
OPENING YEAR	2006		
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers (not defined):	2017 Workers (employees + contract workers):	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	0

Iamgold



- Mine sites in operation
- Closed mine sites (under care & maintenance, closure or post-closure management) – not assessed

HOME COUNTRY	Canada	TSM STATUS	Participating	
STOCK EXCHANGE LISTINGS	TSX: IMG NYSE: IAG	NUMBER OF EMPLOYEES	2017 3,971	
PRE-TAX REVENUES	2017 1,094.9 M US\$	NUMBER OF WORKERS	2017 5,386	
PRODUCTION (2017)	Gold: 882,000 oz	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: 0 Contract workers: 1	2017 Employees: 1 Contract workers: 1

Main shareholders (as of 08/11/2018)

- Van Eck Associates Corporation (USA): 13 %

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Burkina Faso

Essakane

SCORE
13%



COMPANY	Iamgold (since 2009)		
COMPANY'S SHARE	90%		
ALIASES	Falagountou		
MINING TYPE/S	Open-pit		
PRODUCTION (2017)	Gold: 432,000 oz		
OPENING YEAR	2010		
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017	
	Employees: 0	Employees: 0	0
	Contract workers: 1	Contract workers: 0	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	2
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	1
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0.5
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	1
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Suriname Rosebel

SCORE
10%



COMPANY	Iamgold (since 2006)		
COMPANY'S SHARE	95%		
ALIASES	-		
MINING TYPE/S	Open-pit		
PRODUCTION (2017)	Gold: 318,000 oz		
OPENING YEAR	2004		
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017	
	Employees: 0	Employees: 0	0
	Contract workers: 0	Contract workers: 0	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	1
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0.5
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Canada Westwood

SCORE
7%

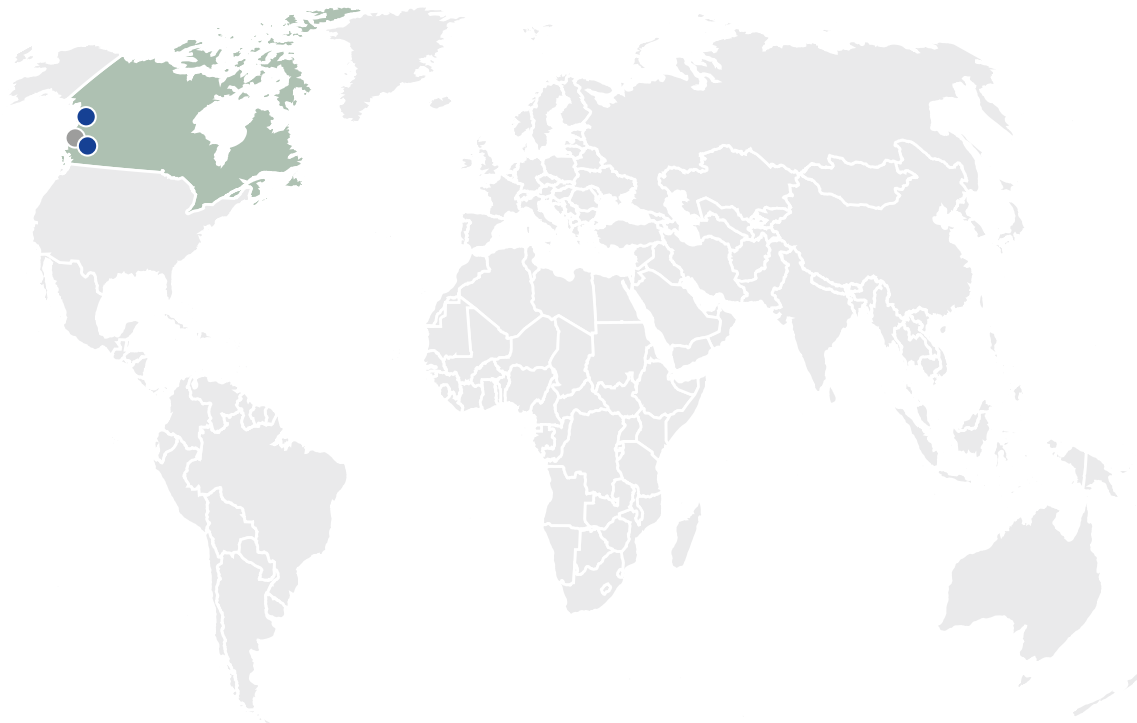


COMPANY	Iamgold (since 2006)		
COMPANY'S SHARE	100%		
ALIASES	Westwood-Doyon		
MINING TYPE/S	Underground		
PRODUCTION (2017)	Gold: 125,000 oz		
OPENING YEAR	2014		
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017	
	Employees: 0	Employees: 1	
	Contract workers: 0	Contract workers: 1	

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Imperial Metals



- Mine sites in operation
- Closed mine sites (under care & maintenance, closure or post-closure management) – not assessed

HOME COUNTRY	Canada	TSM STATUS	Participating
STOCK EXCHANGE LISTINGS	TSX: III	NUMBER OF EMPLOYEES	Not reported
PRE-TAX REVENUES	2017 453.1 M USD	NUMBER OF WORKERS	2017 924
PRODUCTION (2017)	Gold: 81,425 oz Silver: 169,783 oz Copper: 93,707 klbs	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported 2017 Employees: not reported Contract workers: not reported

Main shareholders (as of 30/09/2018)

- N. Murray Edwards & controlling companies (Canada): 39.5 %
- Fairholme Capital Management, LLC (USA): 19.9 %

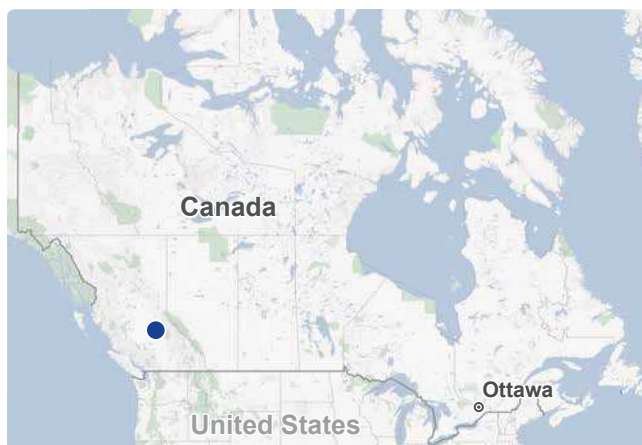
Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☐ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Canada

Mount Polley

SCORE
23%



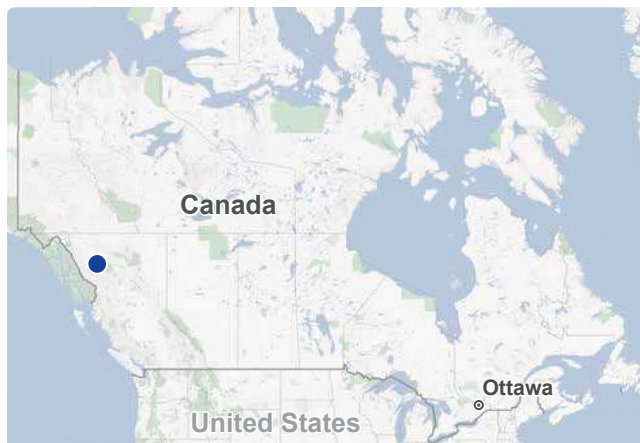
COMPANY	Imperial Metals (since 1987)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 48,009 oz Copper: 19,071 klbs Silver: 36,626 oz	
OPENING YEAR	1997	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	1
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0.5
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	1
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	2.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	1.5
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	2
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	2

Canada Red Chris

SCORE
17%

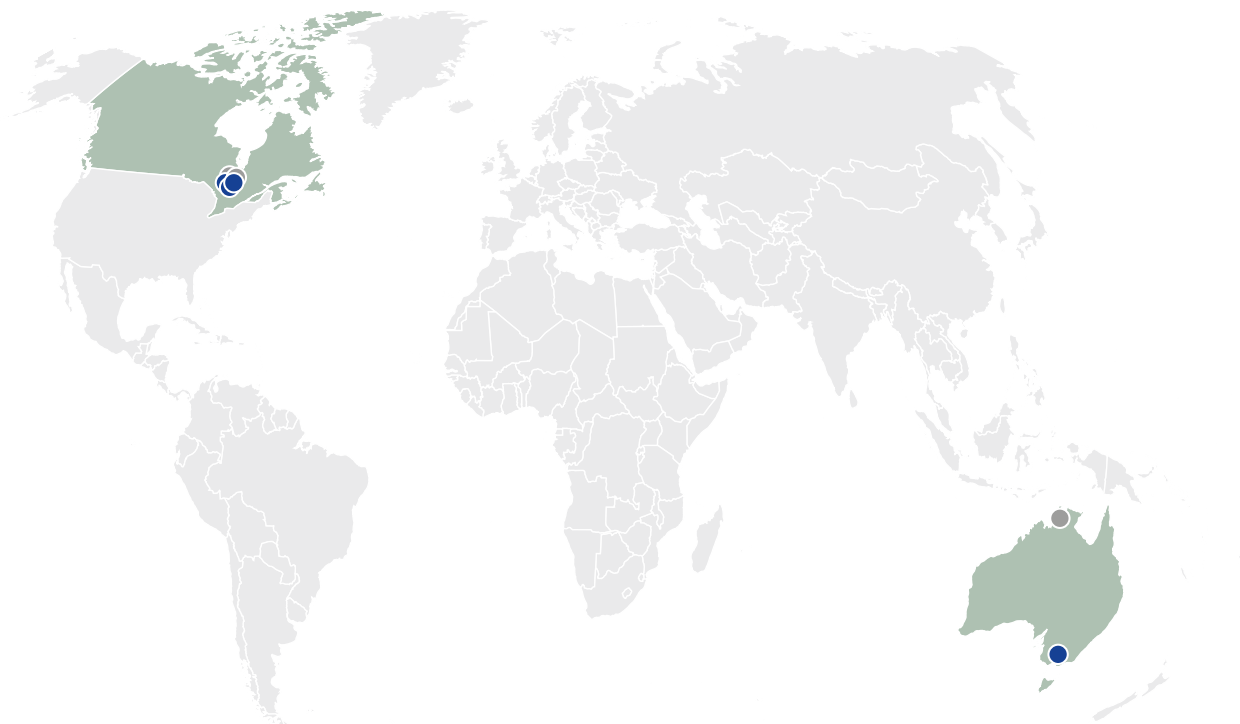


COMPANY	Imperial Metals (since 2007)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 33,416 oz Silver: 133,157 oz Copper: 74,636 klbs	
OPENING YEAR	2015	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	1.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	1.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	1
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	2
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	1.5

Kirkland Lake Gold



- Mine sites in operation
- Closed mine sites (under care & maintenance, closure or post-closure management) – not assessed

HOME COUNTRY	Canada		TSM STATUS	Not participating	
STOCK EXCHANGE LISTINGS	TSX: KL	ASX: KLA	NUMBER OF EMPLOYEES	2017	
	NYSE: KL			1,690	
PRE-TAX REVENUES	2017		NUMBER OF WORKERS	2017	
	747.5 M USD			2,034	
PRODUCTION (2017)	Gold: 596,405 oz		COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017
				Employees: not reported	Employees: not reported
				Contract workers: not reported	Contract workers: not reported

Main shareholders

- Unknown

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Australia

Fosterville

SCORE
16%



COMPANY	Kirkland Lake Gold (since 2012)	
COMPANY'S SHARE	100%	
ALIASES	FGM	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 263,845 oz	
OPENING YEAR	2005	
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017
	Employees: not reported Contract workers: not reported	Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	1
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	1.5
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	1
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	1.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0



COMPANY	Kirkland Lake Gold (since 2016)	
COMPANY'S SHARE	100%	
ALIASES	McDermott	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 66,677 oz	
OPENING YEAR	2011	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	1.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	2
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Canada Macassa

SCORE
14%



COMPANY	Kirkland Lake Gold (since 2001)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 194,237 oz	
OPENING YEAR	1933	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	1
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	2
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	2.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

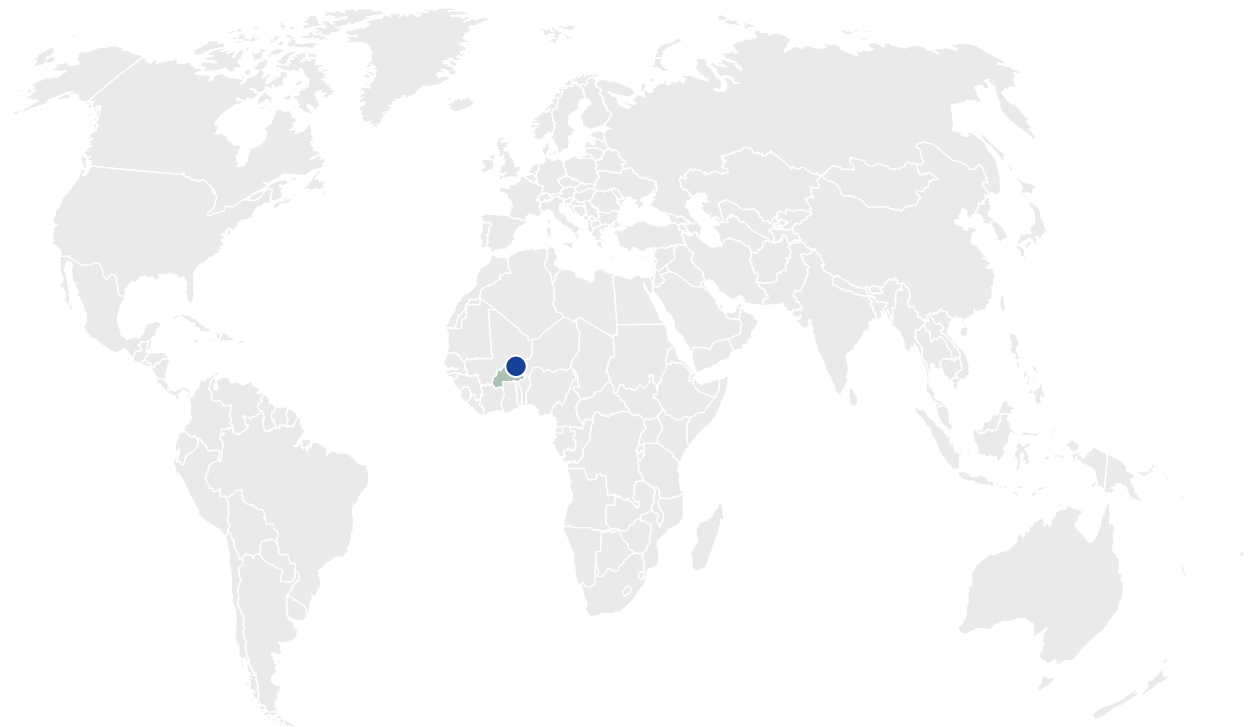


COMPANY	Kirkland Lake Gold (since 2016)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 50,764 oz	
OPENING YEAR	2015	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	1
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	1
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	2
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Komet Resources



● Mine sites in operation

HOME COUNTRY	Canada	TSM STATUS	Not participating
STOCK EXCHANGE LISTINGS	TSX.V: KMT	NUMBER OF EMPLOYEES	Not reported
PRE-TAX REVENUES	2017 3.1 M USD	NUMBER OF WORKERS	Not reported
PRODUCTION (2017)	Gold: 1,267 oz	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported
			2017 Employees: not reported Contract workers: not reported

Main shareholders

- Unknown

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☐ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Burkina Faso

Guiro

SCORE
3%

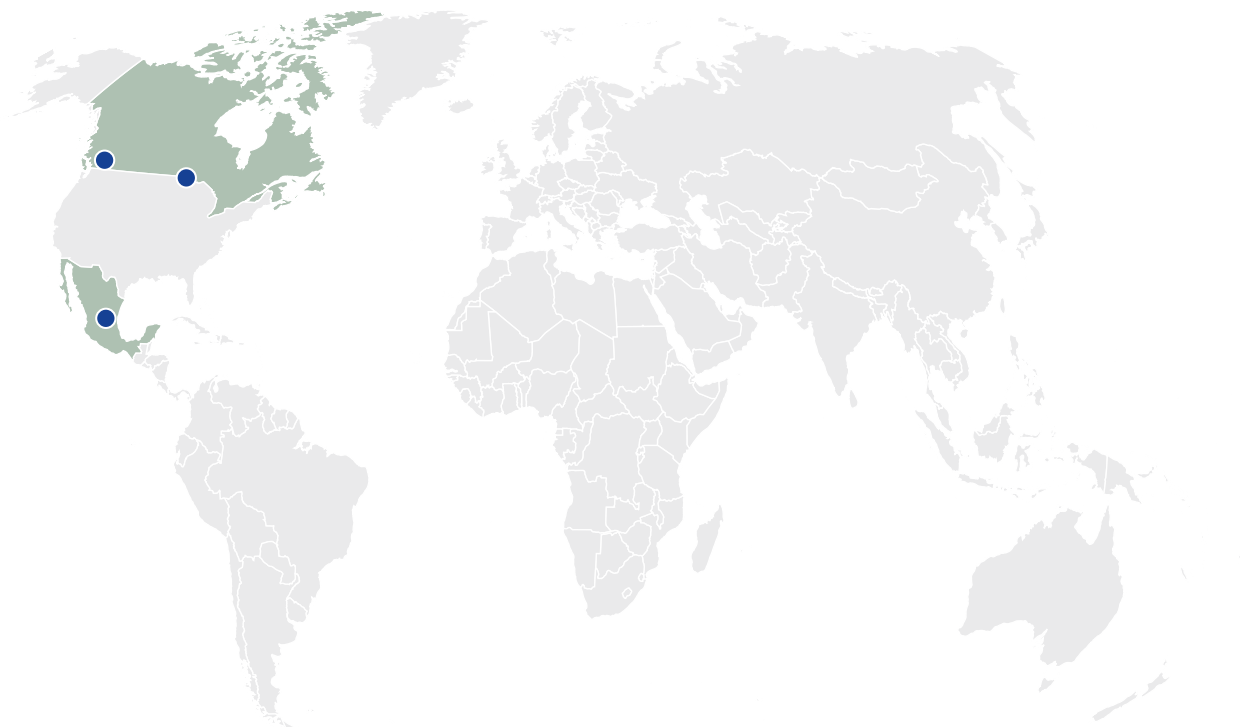


COMPANY	Komet Resources (since 2014)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 1,267 oz	
OPENING YEAR	2017	
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017
	Employees: not reported Contract workers: not reported	Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0.5
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

New Gold



● Mine sites in operation

HOME COUNTRY	Canada			TSM STATUS	Participating		
STOCK EXCHANGE LISTINGS	TSX: NGD			NUMBER OF EMPLOYEES	Not reported		
PRE-TAX REVENUES	2017 604.4 M USD			NUMBER OF WORKERS	2017 1,834		
PRODUCTION (2017)	Gold: 422,411 oz Silver: 950,000 oz Copper: 104,400 klb			COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported	

Main shareholders

- Unknown

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Cerro San Pedro

SCORE
11%

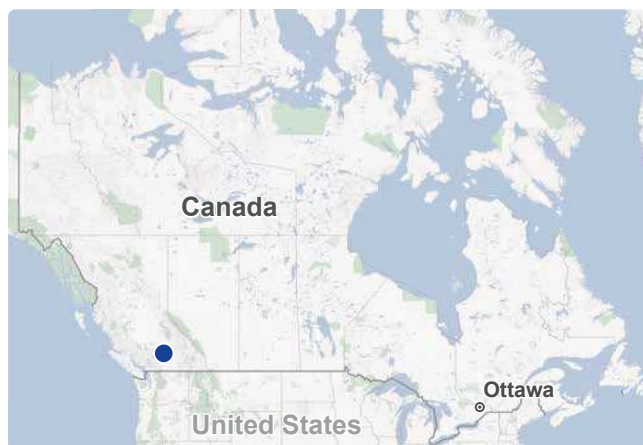

COMPANY	New Gold (since 2008)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Tailings leach	
PRODUCTION (2017)	Gold: 34,337 oz Silver: 61,000 oz	
OPENING YEAR	2007	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: 0 Contract workers: 0	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0.5
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	1
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	1
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Canada New Afton

SCORE
18%



COMPANY	New Gold (since 1999)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 86,163 oz Silver: 300,000 oz Copper: 90,600 klbs	
OPENING YEAR	2012	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers: (employees + contract workers) 0	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	1
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	1.5
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	1
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0.5
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	1
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	2
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Canada Rainy River

SCORE
32%

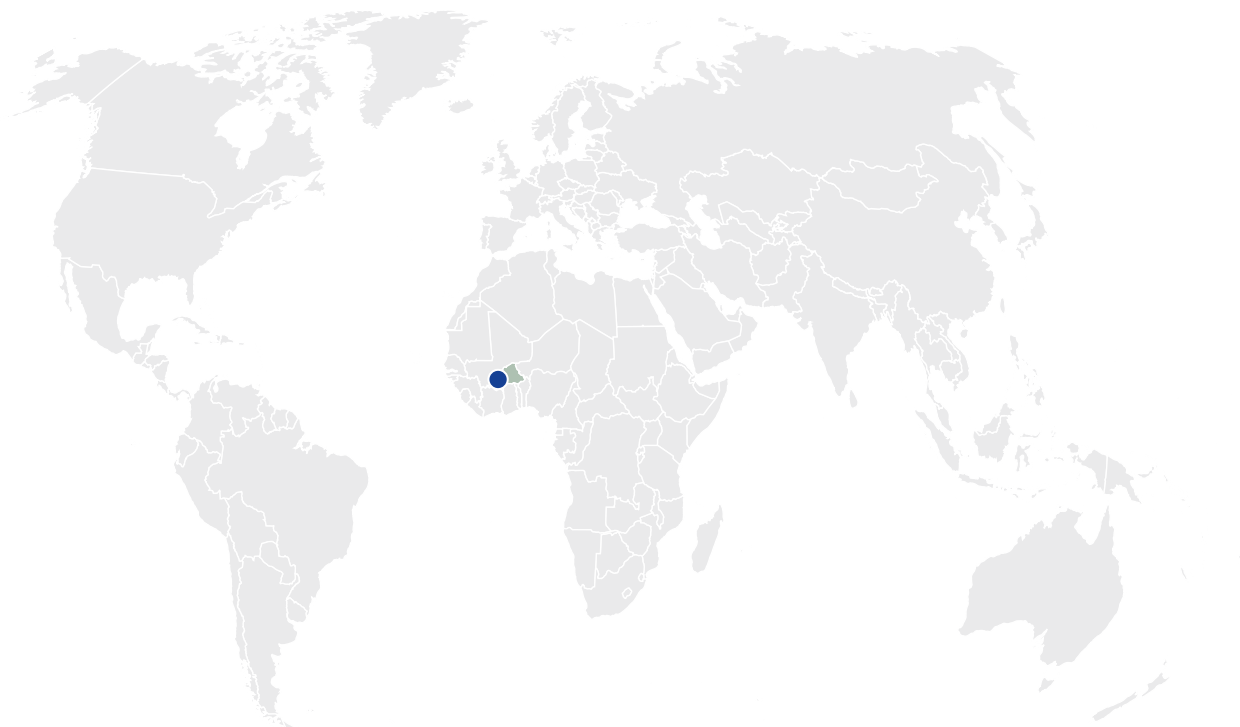


COMPANY	New Gold (since 2013)	
COMPANY'S SHARE	100%	
ALIASES	-	
MINING TYPE/S	Open-pit, Underground	
PRODUCTION (2017)	Gold: 28,509 oz Silver: 40,000 oz	
OPENING YEAR	2017	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Workers: (employees + contract workers)	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	1
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	1.5
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	1
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	1
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	1.5
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	2.5
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0.5
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	1
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	1.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	2

Roxgold



● Mine sites in operation

HOME COUNTRY	Canada			TSM STATUS	Not participating		
STOCK EXCHANGE LISTINGS	TSX: ROXG			NUMBER OF EMPLOYEES	2017 492		
PRE-TAX REVENUES	2017 159.4 M USD			NUMBER OF WORKERS	Not reported		
PRODUCTION (2017)	Gold: 126,990 oz			COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: Contract workers:	2017 Employees: Contract workers:	0 0

Main shareholders *(as of 31/03/2018)*

- Appian Capital Advisory LLP (UK): 13.2 %
- M&G Investment Management Ltd. (UK): 9.7 %
- 1832 Asset Management L.P. (Canada): 9 %
- African Lion 3 (Australia): 6.5 %
- International Finance Corporation (IFC) (USA): 6.2 %
- Sentry Investment Management (Canada)
- RBC Global Asset Management Inc. (Canada)
- Sprott Inc. (Canada)
- Van Eck Associates Corporation (USA)
- IA Investment Management (Canada)

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Burkina Faso

Yaramoko

SCORE
40%

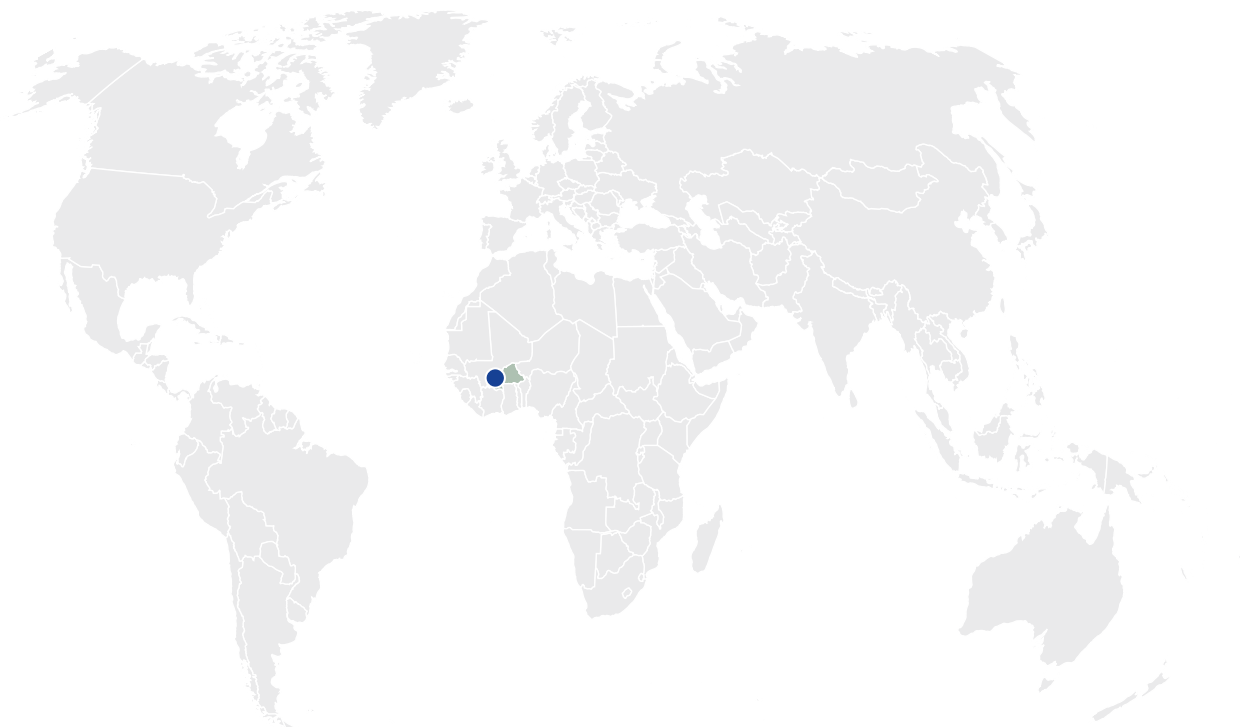


COMPANY	Roxgold (since 2012)		
COMPANY'S SHARE	90%		
ALIASES	55 Zone, Bagassi South		
MINING TYPE/S	Underground		
PRODUCTION (2017)	Gold: 126,990 oz		
OPENING YEAR	2016		
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017	
	Employees: 0	Employees: 0	0
	Contract workers: 0	Contract workers: 0	0

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	2
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	3
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	1.5
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	2
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	1.5
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	1.5
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	2.5
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0.5
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	2

Semafo



● Mine sites in operation

HOME COUNTRY	Canada	TSM STATUS	Not participating
STOCK EXCHANGE LISTINGS	TSX: SMF OMX: SMF	NUMBER OF EMPLOYEES	2017 1,034
PRE-TAX REVENUES	2017 259.0 M USD	NUMBER OF WORKERS	2017 3,956
PRODUCTION (2017)	Gold: 206,400 oz	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported
			2017 Employees: not reported Contract workers: not reported

Main shareholders *(as of 06/03/2018)*

- Van Eck Associates Corporation (USA): 10.17 %

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Burkina Faso

Mana

SCORE
1%

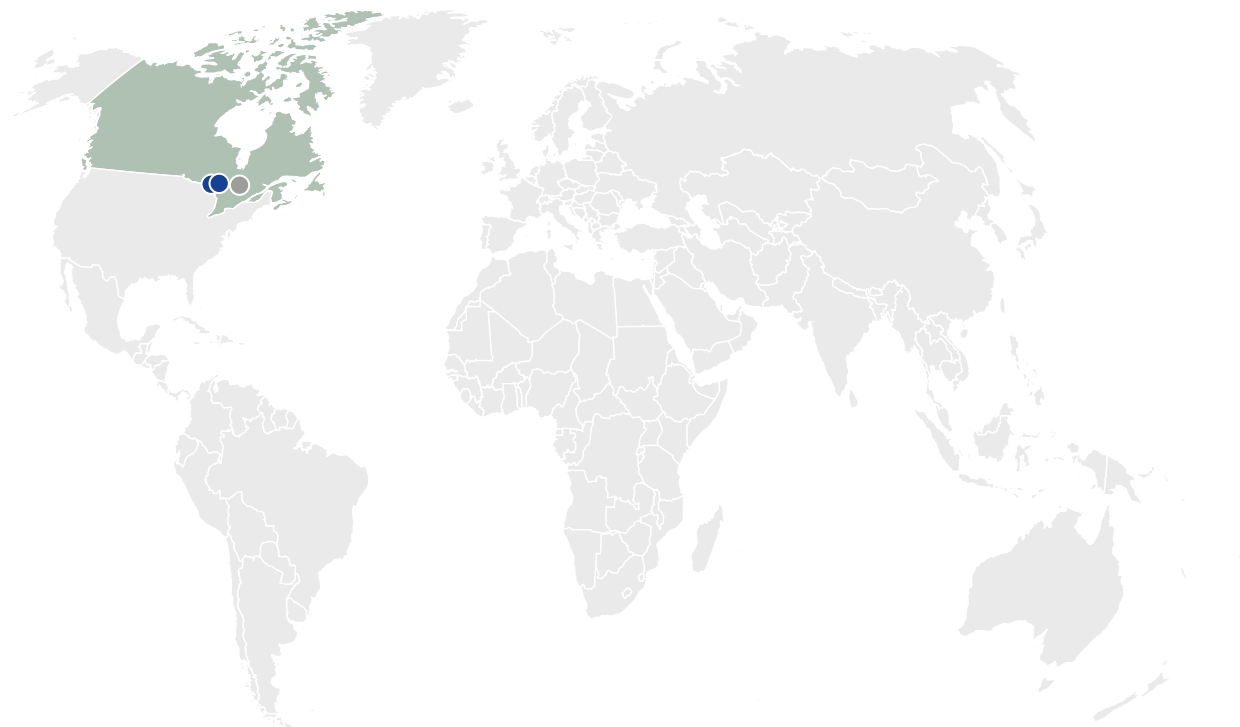


COMPANY	Semafo (since 2007)	
COMPANY'S SHARE	90%	
ALIASES	Wona	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 206,400 oz	
OPENING YEAR	2008	
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017
	Employees: not reported Contract workers: not reported	Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> Ongoing engagement Inclusion of women Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> Expatriates/Nationals Employees/Contract workers Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> National and local spending Support to local suppliers Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> Wages vs. Living wage levels Employees/Contract workers Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> Identification of safety equipment Provision of safety equipment Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> Number and nature of grievances Actions taken in response Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> Identification Consultation processes FPIC and reporting 	0
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> Identification Engagement with ASM Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> Disclosure of EIAs Regular updates Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> Disaggregated data against limits Discussion with stakeholders Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> Disclosure of plan Costing of plan Progress tracking 	0.5
14	Post-closure viability for communities	<ul style="list-style-type: none"> Post-closure viability plans Land-use opportunities Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> Disclosure of plans Tailings and waste facilities Collaborative testing 	0

Wesdome Gold Mines



- Mine sites in operation
- Closed mine sites (under care & maintenance, closure or post-closure management) – not assessed

HOME COUNTRY	Canada	TSM STATUS	Not participating
STOCK EXCHANGE LISTINGS	TSX: WDO	NUMBER OF EMPLOYEES	Not reported
PRE-TAX REVENUES	2017 76.4 M USD	NUMBER OF WORKERS	Not reported
PRODUCTION (2017)	Gold: 58,980 oz	COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported
			2017 Employees: not reported Contract workers: not reported

Main shareholders (as of November 2018)

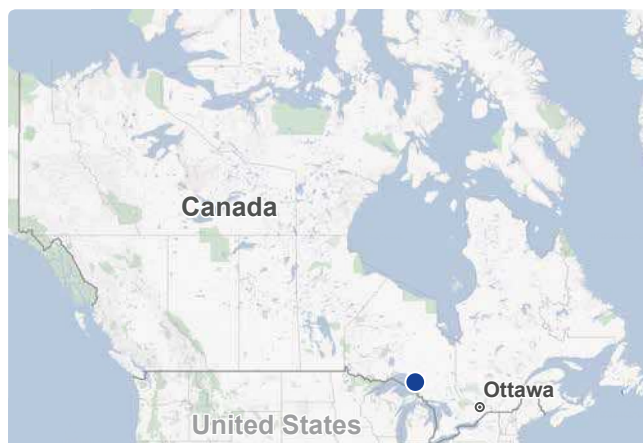
- 1832 Asset Management L.P. (Canada)
- Van Eck Associates Corporation (USA)
- OppenheimerFunds Inc. (USA)
- RBC Global Asset Management Inc. (Canada)
- Mackenzie Financial Corporation (USA)
- Gabelli Asset Management Company Investors (Canada)
- U.S. Global Investors Inc. (USA)

Corporate policy documents

- ☐ Committing to respect human rights, in line with the UN Guiding Principles on Business and Human Rights.
- ☒ Committing to prevent all direct and indirect forms of bribery and corruption.
- ☐ Committing to respect fundamental workers' rights, including freedom of association and right to organise, in line with the ILO Labour Standards.

Canada Eagle River

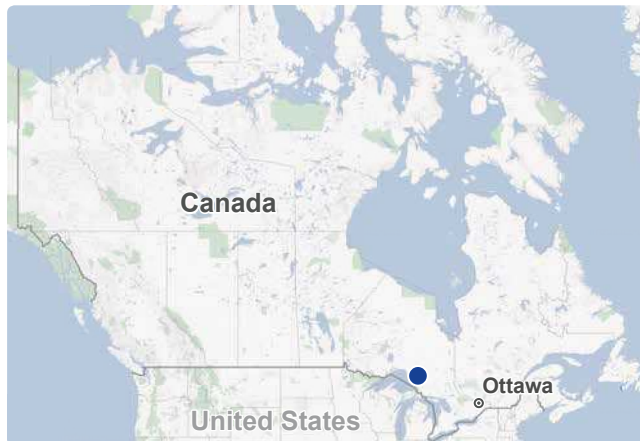
SCORE
2%



COMPANY	Wesdome Gold Mines (since 1994)	
COMPANY'S SHARE	100%	
ALIASES	Eagle River Complex	
MINING TYPE/S	Underground	
PRODUCTION (2017)	Gold: 50,996 oz	
OPENING YEAR	1996	
COMPANY-REPORTED MINING WORKER FATALITIES	2016	2017
	Employees: not reported Contract workers: not reported	Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	1
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	0



COMPANY	Wesdome Gold Mines (since 1995)	
COMPANY'S SHARE	100%	
ALIASES	Eagle River Complex, Magnacon	
MINING TYPE/S	Open-pit	
PRODUCTION (2017)	Gold: 7,985 oz	
OPENING YEAR	2002	
COMPANY-REPORTED MINING WORKER FATALITIES	2016 Employees: not reported Contract workers: not reported	2017 Employees: not reported Contract workers: not reported

Indicator-by-indicator results

01	Community engagement	<ul style="list-style-type: none"> ● Ongoing engagement ● Inclusion of women ● Satisfaction monitoring 	0
02	Local employment	<ul style="list-style-type: none"> ● Expatriates/Nationals ● Employees/Contract workers ● Local community workers 	0
03	Local procurement	<ul style="list-style-type: none"> ● National and local spending ● Support to local suppliers ● Women-focused actions 	0
04	Community grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
05	Living wage	<ul style="list-style-type: none"> ● Wages vs. Living wage levels ● Employees/Contract workers ● Men/Women 	0
06	Workers' safety	<ul style="list-style-type: none"> ● Identification of safety equipment ● Provision of safety equipment ● Women-adapted PPE 	0
07	Worker grievance mechanism	<ul style="list-style-type: none"> ● Number and nature of grievances ● Actions taken in response ● Satisfaction monitoring 	0
08	Indigenous Peoples	<ul style="list-style-type: none"> ● Identification ● Consultation processes ● FPIC and reporting 	1
09	Artisanal and small-scale mining	<ul style="list-style-type: none"> ● Identification ● Engagement with ASM ● Inclusion of women 	0
10	Environmental impact assessments	<ul style="list-style-type: none"> ● Disclosure of EIAs ● Regular updates ● Discussion with stakeholders 	0
11	Water quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
12	Air quality	<ul style="list-style-type: none"> ● Disaggregated data against limits ● Discussion with stakeholders ● Collaborative monitoring 	0
13	Progressive rehabilitation	<ul style="list-style-type: none"> ● Disclosure of plan ● Costing of plan ● Progress tracking 	0
14	Post-closure viability for communities	<ul style="list-style-type: none"> ● Post-closure viability plans ● Land-use opportunities ● Collaborative development 	0
15	Emergency preparedness and response plans	<ul style="list-style-type: none"> ● Disclosure of plans ● Tailings and waste facilities ● Collaborative testing 	0

Methodology

Methodology

Methodology development

The methodology development process took into account:

- The analytical framework, methodology and results of the RMI 2018 report;
- Discussions and consultations on RMI 2018 with civil society, mining-affected stakeholders, labour unions, mining companies, mining associations, investors and other stakeholders;
- Guidance and input from the Responsible Mining Foundation's Expert Review Committee; and
- Recommendations from meetings with external experts consulted for RMI 2018.

The Responsible Mining Foundation (RMF) also held a workshop with mining-affected community representatives from all the mining regions of Burkina Faso in April 2018, to elicit their recommendations on the scope of the study and the priority issues to assess.

Assessment framework

The assessment is structured around three levels:

- Fifteen topics;
- One indicator per topic – statements on company actions and disclosure practices on particular ESG issues;
- Three elements per indicator – specific aspects of the actions and disclosure practices, against which companies are assessed.

The indicators and elements were developed on the basis of what society can reasonably expect from mining companies, and what mining company management should know about their performance on the topics in question. The topics covered by the study were selected from a larger number of topics, based on their incisiveness and their ability to serve as proxies for disclosure on other ESG issues.

Company and mine-site scope

In order to ensure comparability, mining companies were selected for inclusion in the study on the basis of the following criteria:

- **Listing:** all companies are listed on the same stock exchange (TMX Toronto Stock Exchange and Venture Exchange);
- **Size:** all companies are small or mid-tier companies (up to 1 BUSD in pre-tax revenues); and
- **Activities:** all companies are active in metals or minerals production (i.e. not only exploration, and not oil and gas) and all mine sites are gold-producing, in some cases associated with silver and/or copper production.



Based on the above criteria, the following twelve companies were included in the study:

- Alamos Gold
- Avesoro Resources
- Centerra Gold
- Endeavour Mining
- Iamgold
- Imperial Metals
- Kirkland Lake Gold
- Komet Resources
- New Gold
- Roxgold
- Semafo
- Wesdome Gold Mines

All 31 operating mine sites that belong to the 12 companies selected are included in this study. One site (Mesquite) was sold over the course of the research period and was thus excluded from this report.

Assessment process

Data collection

Public domain data search

RMF data analysts first undertook a search of public-domain data sources on the mine sites included in the study. The analysts pre-populated the online questionnaire with data and corresponding source documents relating directly to the indicators and their elements. Data collection covered the most up-to-date information available. Data collection followed a triangulation approach, with analysts consulting a range of different sources, including non-company sources of information.

Company reporting

The pre-populated questionnaire was then shared individually with companies via a secure online platform, which includes for each mine site:

- Specific indicators and elements with guidelines on the kinds of evidence that would be considered relevant for each one;
- Pre-filled fields showing any public domain data that had already been collected for each indicator, and the sources used.

Companies were given a six-week timeframe to review the pre-filled data and add any additional information on their mine sites, supported by evidence.

Open data

For transparency purposes, and since none of the indicators requires business-sensitive information, companies were informed from the beginning of the study that all information provided to RMF by companies on its online platform would be considered open data, and could be made public by RMF at the time of the publication of the report or at a later date. This includes responses to questions entered on the online Platform, supporting documents uploaded, links provided to digital information, and any additional information or comments provided.



Clarification questions

For companies that reported information, additional questions were sent in order to clarify specific details or fill data gaps, and to ensure the assessment accurately reflects the practices that are reported.

Data analysis

Based on all data collected during the public-domain search and the company-reporting period, RMF analysts assigned scores to each element according to the scoring framework (see mine-site-study-2019.responsibleminingfoundation.org).

The analysis was undertaken in two phases:

- An initial mine-site-by-mine-site assessment for all indicators, followed by an internal peer review;
- A final indicator-by-indicator assessment for all mine sites followed by an internal peer review.

The systematic peer-review processes were performed in an iterative manner in order to ensure impartiality, consistency and reliability of the assessment.

Scoring

Scoring was evidence-based, with the assessment made on the grounds of documented evidence. Guidance was provided to companies on the types of relevant evidence for each indicator.

Scoring was done at the element level for each indicator. A full score (1 point) was assigned in cases where the company is able to demonstrate that it fully addresses the issues(s) articulated in the element. A partial score (0.5 point) was assigned when the evidence provided by the company partially addresses the issue(s) articulated in the element.

With each element scored on a 0-1 scale, and each indicator composed of three elements, the maximum score for each indicator is 3. Thus, with 15 indicators, the maximum overall score for a mine site is 45.

The overall mine site score is then expressed as a rounded percentage of the maximum achievable score, taking into account any exceptions granted to a mine site (see below).

The full scoring framework is available online at mine-site-study-2019.responsibleminingfoundation.org.

Exceptions

While most of the indicators have been designed to be applicable to all mine sites, some may not be applicable to a specific mine site. This is the case for indicators related to Indigenous Peoples and to the presence of ASM operations in and around the mine site. Due to their geographic and socio-economic context, some mine sites may not be exposed to these issues.



Any decision to provide an exception on an indicator for a mine site has been solely evidence-based. The operating company needed to be able to demonstrate that the topic covered by the indicator is not relevant to its mine site. If the evidence was considered sufficient, this indicator was excluded from the mine-site assessment, and the overall score scaled accordingly.

Company review

Prior to publication, each company was invited to review for factual accuracy its own set of contextual data at the company-wide and mine-site level.

Limitations

Sources of information

RMF relies on publicly available information from a wide range of sources, supplemented by any additional relevant information that companies provide. While RMF follows a triangulation approach to help ensure completeness and reliability in the data collection, the results of the low-scoring mine sites do not necessarily reflect a lack of relevant practices or data. Rather, low scores may be due to a lack of public reporting by the companies, limitations in accessing information, and/or any difficulties in accessing the online questionnaire.

Reporting period

The assessment cut-off date was set at mid-November 2018. Although some mandatory reporting in Canada (Annual Report, Financial Statements, Management Discussion and Analysis) is due for release in March each year, sustainability reports and ESG data are often released later. RMF analysts collected the most recent data available, covering mostly 2016 and 2017. For some companies, some 2018 data was available, while others had only made 2016 data publicly available.

Mine-site verification

RMF did not undertake any mine-site visits to verify the accuracy of information provided. However, the indicators have been designed in a way to be verifiable by any interested parties. Assessment is evidence-based and all the source documents used are freely available, allowing them to be cross-checked with other sources and used to encourage continuous improvement in companies' responsible mining practices.



Number of indicators

Although RMF acknowledges the fact that additional topics and indicators could be interesting to assess, the number of indicators selected reflects the dual objectives of assessing the most important issues relating to responsible mining and maintaining a reasonable level of effort for reporting companies and RMF analysts. Indicators have been designed to be the most incisive and to provide the opportunity to be used as proxies to capture the broader performance of the operating company on the specific topic.

Annexes and References

Annex 1 | Full questionnaire

LEGEND

No. | Topic

Indicator

Contextual profile

Provide evidence demonstrating that:

- Three elements by which the indicator is assessed.

01 | Community engagement

The operating company engages with project-affected communities on matters that may impact them.

Community engagement in the form of dialogue, joint decision-making and collaborative action is key to ensuring that the interests and concerns of project-affected communities are adequately considered by mining companies. Proactive and inclusive community engagement helps companies to reduce conflict and build community relationships based on trust, mutual respect and understanding.

Provide evidence demonstrating that:

- The operating company implements ongoing engagement processes with project-affected communities on matters that may impact them.
- The community engagement processes include specific actions to engage with women.
- The operating company monitors community satisfaction with the outcomes of its engagement processes.

02 | Local employment

The operating company publicly discloses data on the composition of its workforce.

Public disclosure of disaggregated workforce data allows companies to demonstrate their commitment to investment in the economic development of local communities and the wider populations in producing countries. As contract workers are increasingly being used across the mining industry, it is essential for companies to distinguish them in their workforce data, to provide a more complete picture of the employment situation.

Provide evidence demonstrating that:

- The operating company publicly discloses data on its workforce composition, showing numbers of expatriates and nationals.
- The workforce data show numbers of employees and contract workers.
- The workforce data also show numbers of workers from local communities (or from local municipalities/districts) among employees and contract workers.

03 | Local procurement

The operating company publicly discloses data on local procurement and supports local suppliers.

Sourcing items locally, from food supplies produced by local farmers to heavy equipment manufactured by national enterprises, builds entrepreneurial capacity and develops the economy of the producing country, while also reducing procurement costs in the long term. Specific support is often required to create a level playing field for local (sub-national) suppliers to effectively compete for bids.

Provide evidence demonstrating that:

- The operating company publicly discloses data on its procurement, showing proportions and amounts spent on national and local suppliers.
- The operating company provides support to local suppliers in navigating the tender process and responding to tenders.
- This support includes specific actions to support women entrepreneurs.

04 | Community grievance mechanism

The operating company publicly discloses data on its community grievance mechanism and takes actions to provide appropriate remedy.

Community grievance mechanisms are formal processes that enable individuals or groups from project-affected communities to raise concerns and seek remedy for any negative impacts from a company's activities. This allows companies to know about and respond to concerns in a timely manner. Community members are more likely to trust and use such mechanisms if companies disclose how the grievance mechanisms are being used, and whether effective remedy is achieved.

Provide evidence demonstrating that:

- The operating company publicly discloses data on its community grievance mechanism, showing the number and nature of grievances filed by project-affected communities.
- The operating company takes actions in response to the grievances filed, to provide appropriate remedy.
- The operating company tracks the satisfaction of claimants with the remedies provided.

05 | Living wage

The operating company ensures that the wages of all its employees and contract workers at least match fair living wage levels.

A fair living wage 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. Mining companies that ensure their employees and contract workers are paid a living wage are fulfilling their responsibility to respect their workers' human rights. In the absence of formally defined fair living wage levels, mining companies can take leadership positions by assessing and applying wage levels that will provide for the needs of workers and their families in the specific local context.

Provide evidence demonstrating that:

- The operating company publicly discloses data on the wages of its employees, showing they meet or exceed fair living wage levels applicable to the area of the mine site (or the legal minimum wage if higher).
- The operating company discloses this data specifically for contract workers as well as employees.
- The operating company discloses this data specifically for women workers as well as men.

06 | Workers' safety

The operating company ensures its employees and contract workers are provided with appropriate safety equipment.

As mining is an inherently hazardous occupation, companies have particular responsibilities to ensure safe working conditions, to seek to prevent deaths, injuries and illnesses. This includes ensuring that all employees and contract workers are provided with appropriate safety equipment. Gender-appropriate Personal Protective Equipment is important to ensure effective protection for women workers.

Provide evidence demonstrating that:

- The operating company identifies appropriate safety equipment for all workers.
- The operating company ensures the provision of appropriate safety equipment for all workers.
- The operating company ensures provision of suitable PPE for women workers.

07 | Worker grievance mechanism

The operating company publicly discloses data on its worker grievance mechanism and takes actions to provide appropriate remedy.

An effective grievance mechanism for workers provides a fair hearing and remedy process, so that workers can be satisfied that their complaints have been heard and taken seriously, leading to more constructive working relationships. Mining companies can promote confidence in the grievance process by creating ample opportunities for workers to provide feedback on its effectiveness and their satisfaction with the remedies provided, without fear of punishment or retribution.

Provide evidence demonstrating that:

- The operating company publicly discloses data on its worker grievance mechanism, showing the number and nature of grievances filed by workers.
- The operating company takes actions in response to the grievances filed, to provide appropriate remedy.
- The operating company tracks the satisfaction of claimants with the remedies provided.

08 | Indigenous Peoples

The operating company consults with Indigenous Peoples potentially affected by its activities, and respects their right to Free, Prior and Informed Consent on the use of their land.

Free, Prior and Informed Consent (FPIC) recognises the rights of Indigenous Peoples to determine their development priorities where potential mining operations affect their land and way of life. Consultation as part of the FPIC process needs to be conducted in good faith, and in a timely and inclusive manner to ensure the integrity of the process and provide both the company and the Indigenous Peoples with a solid foundation for relationships and agreements.

Provide evidence demonstrating that:

- The operating company identifies Indigenous Peoples potentially affected by its activities.
- The operating company implements consultation processes for Indigenous Peoples on the use of their land.
- The operating company publicly reports on whether Free, Prior and Informed Consent was obtained, and on the subsequent actions taken on this basis.

09 | Artisanal and small-scale mining

The operating company engages with artisanal and small-scale mining (ASM) operations in and around its mine site.

ASM can be a source of local employment, a contributor to local economies, and a safety net for women and other vulnerable groups. By engaging with ASM miners in their areas of operation, companies can identify opportunities for constructive collaboration serving all parties' interests. As women often play an important role in ASM operations, the engagement process needs to include women to ensure their interests and concerns are adequately addressed.

Provide evidence demonstrating that:

- The operating company identifies any ASM operations in and around its mine site.
- The operating company engages with ASM miners to identify opportunities for constructive collaboration.
- These engagement activities include women working in these operations.

10 | Environmental impact assessments

The operating company publicly discloses assessments of its environmental impacts, and discusses the results of these assessments with project-affected stakeholders.

While the submission of an environmental impact assessment prior to mine construction is often required by law, regular updates of such an assessment will be needed to inform a company's environmental management strategy throughout the life of a mine site. Companies can demonstrate respect for those potentially impacted, build mutual trust, and improve the rigour of their mitigation strategies by systematically discussing the results of their environmental impact assessments with project-affected stakeholders.

Provide evidence demonstrating that:

- The operating company publicly discloses assessments of its environmental impacts, including its impacts on biodiversity.
- These assessments are regularly updated, at least every two years.
- The operating company discusses with project-affected stakeholders the results of these assessments.

11 | Water quality

The operating company publicly discloses water quality monitoring data, discusses monitoring results with project-affected stakeholders and takes actions to improve water quality in its catchments or regional basins.

While it is now standard practice for mining companies to report generally on water quality, companies can demonstrate leadership and build mutual trust by discussing water quality monitoring results with project-affected stakeholders, and showing clearly where and when water quality dropped below established limits. Effective water quality management strategies need to extend beyond the immediate vicinity of the mine site to take into account water impacts and users within the broader catchment or watershed area.

Provide evidence demonstrating that:

- The operating company publicly discloses data on water quality in its catchments or regional basins, showing the data disaggregated by measuring point, and against applicable limit values.
- The operating company discusses with project-affected stakeholders the results of its water quality monitoring.
- The operating company collaborates with project-affected stakeholders in monitoring the actions taken to improve water quality in its catchments or regional basins.

12 | Air quality

The operating company publicly discloses air quality monitoring data, discusses monitoring results with project-affected stakeholders and takes actions to improve air quality in and around the mine site.

For many project-affected communities, air pollution is the major concern related to the presence of a mining operation, as it affects their health, their food systems, and in some cases their livelihoods. Effective engagement, management and transparency with respect to air quality can help companies to build trust and reduce fears related to dust and air contaminants.

Provide evidence demonstrating that:

- The operating company publicly discloses data on air quality in and around the mine site, showing concentrations of particulate matter and toxic gases, against applicable limit values.
- The operating company discusses with project-affected stakeholders the results of its air quality monitoring.
- The operating company collaborates with project-affected stakeholders in monitoring the actions taken to improve air quality in and around the mine site.

13 | Progressive rehabilitation

The operating company publicly discloses and implements a rehabilitation and closure plan that includes plans for ongoing progressive rehabilitation.

With access to rehabilitation and closure plans, project-affected stakeholders can better assess companies' willingness to deliver positive legacies. Now a common practice (and in some jurisdictions mandatory), ongoing progressive rehabilitation allows companies to limit their environmental impacts, stagger costs, and reduce the liability of their mine sites at closure. This is also called concurrent or gradual rehabilitation, referring to rehabilitation implemented progressively during operations.

Provide evidence demonstrating that:

- The operating company publicly discloses its rehabilitation and closure plan, that includes plans for ongoing progressive rehabilitation.
- The progressive mine rehabilitation and closure plan is costed.
- The operating company tracks its progress on its rehabilitation and closure plan.

14 | Post-closure viability for communities

The operating company develops plans to ensure that project-affected communities remain viable after mine closure.

Planning for a positive legacy necessitates measures to ensure that project-affected communities have viable and sustainable livelihoods after mine closure. This includes plans to maintain or re-establish access to healthy natural resources (land, water, etc.) and economic opportunities. An effective mine closure planning process involves communities in the setting of closure goals and the development of action plans.

Provide evidence demonstrating that:

- The operating company develops plans to ensure post-closure socio-economic viability for project-affected communities.
- These plans include post-mining land-use opportunities.
- These plans take into account the goals and views of project-affected communities.

15 | Emergency preparedness and response plans

The operating company publicly discloses and tests its emergency preparedness and response plans, including for risks associated with tailings dams and other waste facilities.

While mining-related emergencies can never be entirely prevented, companies can minimise the negative consequences of such emergencies by developing crisis management and emergency preparedness plans. The planned procedures will be more effective if project-affected stakeholders (e.g. community members, local authorities and emergency responders) are involved in the testing of their implementation.

Provide evidence demonstrating that:

- The operating company publicly discloses its emergency preparedness and response plans.
- The plans include risks associated with tailings dams and other waste facilities.
- The operating company includes project-affected stakeholders in testing these response plans.

Annex 2 | Indicator mapping

This table shows areas of broad alignment between the topics included in the study and those covered by a selection of other initiatives. For more details on these initiatives, see References section.

	UN Sustainable Development Goals	UN Declaration on the rights of Indigenous and Tribal Peoples	UN Guiding Principles on Business and Human Rights	Africa Mining Vision	AIB Social and Environmental Framework	CCCMC Guidelines
01 Community engagement	5, 10, 16		C2	6 11	Standard 1.A	2.1.5 2.8.1 2.8.2
02 Local employment	1, 2, 8, 10				Environmental and Social Standard Vision	2.8.7
03 Local procurement	1, 2, 8			8		2.8.9
04 Community grievance mechanism	16		C6		Standard 1.A	2.8.4
05 Living wage	1, 2, 8, 10				Environmental and Social Standard Vision	
06 Workers' safety	3, 5, 8				Standard 1.D	2.5.6
07 Worker grievance mechanism	8, 16		C6		Standard 1.D	2.5.9
08 Indigenous Peoples	10	Article 4 Article 10 Article 29			Standard 3	2.8.2
09 Artisanal and small-scale mining	1, 2, 4, 8, 10			5		2.8.8
10 Environmental impact assessments	11, 12, 15			10	Standard 1.A Standard 1.B	2.7.2 2.7.12
11 Water quality	3, 6, 12, 14				Standard 1.A Standard 1.B	2.7.5
12 Air quality	3, 11, 12, 13				Standard 1.A Standard 1.B	2.7.5
13 Progressive rehabilitation	12, 15			6	Standard 1.B	2.7.4
14 Post-closure viability for communities	1, 2, 8, 10, 15				Standard 1.C	
15 Emergency preparedness and response plans	3, 11				Standard 1.D	2.7.3

	EWB-MSV Local Procurement Reporting Mechanism	GRI Standards (2018)	IFC Performance Standards	ILO Conventions	IRMA Standard (2018)	MAC Towards Sustainable Mining	Responsible Mining Index (2018)	WB/IFC Mining Together ASM Guide for Action
01		102-43 413-1	Standard 1		1.2	Aboriginal and Community Outreach	D.02	
02		203-2 401-1			3.1		MS.02	
03	LPRM 200 LPRM 300 LPRM 500	204-1			2.3		MS.01	
04		406-1 413-1	Standard 1		1.4	Aboriginal and Community Outreach	MS.03	
05					3.1		E.01	
06			Standard 2	Convention 176	3.2		E.02	
07		406-1	Standard 2		3.1		MS.04	
08			Standard 1 Standard 7	Convention 169	2.2	Aboriginal and Community Outreach	D.06	
09					3.6		D.09	A. B.
10		102-15 304-2 413-1	Standard 1 Standard 6		2.1	Biodiversity Conservation Management	F.01 MS.06	
11		303-2 306-1 306-5	Standard 3		4.2	Water Stewardship Framework	MS.05	
12		305-7	Standard 3		4.3		F.03	
13			Standard 6		2.6	Mine Closure Framework	C.03	
14					2.3 2.6	Mine Closure Framework	C.03	
15			Standard 1		2.5	Crisis Management and Communications Planning	F.09	

References

References for Introduction and summary

Responsible Mining Foundation (2018). Responsible Mining Index 2018.
www.responsibleminingindex.org

TMX (2018). TSX Venture Exchange and Toronto Stock Exchange. Realizing Your Vision. 2018 Guide to Listing.
www.tsx.com/ebooks/en/2018-guide-to-listing/

References for Key findings

Open Data Charter (n.d.). Open Data Principles.
www.opendatacharter.net/principles/

References for Observations

Office of the High Commissioner on Human Rights (OHCHR) (2011). Guiding Principles for Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.
www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

References for Mine-site results

ILO (n.d.) Introduction to International Labour Standards: Conventions and Recommendations. International Labour Organization.
www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm

Mining Association of Canada, Towards Sustainable Mining.
www.mining.ca/towards-sustainable-mining

Office of the High Commissioner on Human Rights (OHCHR) (2011). Guiding Principles for Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.
www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

References for Annex 2

Africa Mining Vision. 2009. Africa Mining Vision.

www.africaminingvision.org/amv_resources/AMV/Africa_Mining_Vision_English.pdf

Asian Infrastructure Investment Bank (AIIB). 2016. Environmental and Social Framework.

www.aiib.org/en/policies-strategies/_download/environment-framework/20160226043633542.pdf

China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC). 2014.

www.emm-network.org/wp-content/uploads/2015/03/Guidelines_for_Social_Responsibility_in_Outbound_Mining_Investments.pdf

Corporate Human Rights Benchmark. 2018. Corporate Human Rights Benchmark Methodology 2018 for the Agricultural Products, Apparel and Extractives Industries.

www.corporatebenchmark.org/sites/default/files/documents/CHRB%202018%20Methodology%20Web%20Version.pdf

Global Reporting Initiative (GRI). 2016. GRI Sustainability Reporting Standards.

www.globalreporting.org/standards/

Initiative for Responsible Mining Assurance (IRMA). 2018. Standard for Responsible Mining.

www.responsiblemining.net/wp-content/uploads/2018/07/IRMA_STANDARD_v.1.0_FINAL_2018.pdf

International Council on Mining & Metals (ICMM). 2015. Sustainable Development Framework: ICMM Principles.

www.icmm.com/website/publications/pdfs/commitments/revised-2015_icmm-principles.pdf

International Finance Corporation (IFC). 2012. Performance Standards on Environmental and Social Sustainability.

www.ifc.org/wps/wcm/connect/c8f524004a73daeca09afdf998895a12/IFC_Performance_Standards.pdf?MOD=AJPERES

International Labour Organisation (ILO). 1989. C169 - Indigenous and Tribal Peoples Convention.

www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169

International Labour Organisation (ILO). 1995. C176 - Safety and Health in Mines Convention.

www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C176:NO

International Labour Organisation (ILO). 1948. C087 - Freedom of Association and Protection of the Right to Organise Convention.

www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C087:NO



International Labour Organisation (ILO). 1949. C098 - Right to Organise and Collective Bargaining Convention, 1949.

www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:::NO:12100:P12100_ILO_CODE:C098:NO

International Labour Organisation (ILO). 1951. C100 - Equal Remuneration Convention.

www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:::NO:12100:P12100_ILO_CODE:C100:NO

Mining Association of Canada, Towards Sustainable Mining.

www.mining.ca/towards-sustainable-mining

Mining Shared Value, Engineers Without Borders Canada. 2017. Mining Local Procurement Reporting Mechanism.

www.miningsharedvalue.org/s/v1-mining-lprm-non-selectable-text.pdf

Office of the High Commissioner on Human Rights (OHCHR). 2011. Guiding Principles for Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.

www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Responsible Mining Foundation. 2018. Responsible Mining Index.

www.responsibleminingindex.org

Responsible Mining Foundation. 2017. Methodology Report 2017 for the 2018 Responsible Mining Index.

www.responsibleminingindex.org/resources/methodology/RMI_Methodology_report_2017_English.pdf

Shift. 2019. Human rights reporting in the Canadian mining sector: Maturity trends and insights.

www.shiftproject.org/media/resources/docs/Shift-Canadian-Mining-Report.pdf

United Nation Website. 2015. Sustainable Development Goals.

www.un.org/sustainabledevelopment/sustainable-development-goals/

United Nations. 2008. Declaration on the Rights of Indigenous People.

www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf

World Bank. 2009. Mining together: large-scale mining meets artisanal mining - a guide for action.

www.documents.worldbank.org/curated/en/148081468163163514/pdf/686190ESW0P1120ng0-Together0HD0final.pdf

Disclaimer

The findings, conclusions and interpretations within this report on *Mine-site ESG data disclosure by small and mid-tier mining companies* do not necessarily represent the views of funders, trustees, and employees of the Responsible Mining Foundation (RMF), and others who participated in consultations and as advisors to the report.

This report is intended to be for information purposes only and is not intended as promotional material in any respect. The report is not intended to provide accounting, legal, tax or investment advice or recommendations, neither is it intended as an offer or solicitation for the purchase or sale of any financial instrument.

This study seeks evidence of companies' practices and data reporting on environmental, social and governance (ESG) issues, but does not seek to measure the actual outcomes achieved on these issues. Results are based only on evidence sourced from the public domain or provided by companies as open data. Whilst this information is believed to be reliable, no guarantee can be given that it is accurate or complete, nor does it preclude the possibility that practices or data may exist, but which the study has not been able to consider for purposes of assessment. In this respect, the results of the low-scoring companies do not necessarily reflect a lack of relevant practices or data; as they may be due to a lack of public reporting by the companies, limitations in accessing information, and/or any difficulties in accessing the RMF company portal.

It should be noted that, prior to publication, all companies in this study were invited to check the factual accuracy of the contextual data and evidence upon which this study is based and to review company information in the document library.

Although every effort has been made to verify the accuracy of translations, the English language version should be taken as the definitive version. RMF reserves the right to publish corrigenda on its web page, and readers of the report on *Mine-site ESG data disclosure by small and mid-tier mining companies* report should consult the corresponding web page for corrections or clarifications.

mine-site-study-2019.responsibleminingfoundation.org

Copyright notice

All data and written content are licensed under the Creative Commons Attribution-NonCommercial 4.0 International License (CC BY-NC 4.0). Users are free to share and adapt the material but must give appropriate credit, provide a link to the license and indicate if changes were made. The licensed material may not be used for commercial purposes, or in a discriminating, degrading or distorting way. When cited, attribute to: "Responsible Mining Foundation (2019) | Mine-site ESG data disclosure by small and mid-tier mining companies." Images, photographs, and video content depicted RMF websites are excluded from this license, except where noted.



www.creativecommons.org/licenses/by-nc/4.0/

www.responsibleminingfoundation.org



**Responsible
Mining** Foundation