Towards Sustainable Mining
Draft Policy Documents for Public Comment

The Mining Association of Canada (MAC) has drafted several new and revised policies to support the continual improvement of the *Towards Sustainable Mining* (TSM) program. The aim of these draft policies is to ensure program integrity processes are aligned with evolving best practices for global sustainability standards. The draft policies also reflect an initial round of consultation in 2020, the results of which can be reviewed on the MAC website. Individuals and groups with an interest in supporting the continual improvement of the TSM program are encouraged to review these draft policies and submit any feedback to MAC at kgosselin@mining.ca by August 15, 2021.

The following draft policies are included in this package for public comment:

Tab 1 – Public Comment Policy
Public comment periods are an emerging best practice for sustainability standards. While MAC already engages with external groups in the development of TSM policies and protocols, a public comment policy would permit any interested individual or group to share their views and expertise.

Tab 2 – Claims and Labels Policy
A claims and labels policy aims to strengthen the protection of TSM intellectual property and to support MAC in navigating any instances of misuse of TSM claims and labels, whether in relation to the TSM logo, claims about TSM performance or other relevant concerns.

Tab 3 – Issues Resolution Mechanism Policy
An issues resolution mechanism policy is intended to enhance the credibility, accountability, and transparency of TSM by providing a formal mechanism through which interested individuals or groups can raise concerns related to TSM.

Tab 4 – Verifier Oversight Policy
Oversight of verifier activities was a key recommendation of the survey conducted in 2020 and is an emerging best practice for sustainability standards. A verifier oversight policy aims to ensure that verifiers are competent and consistent in applying the TSM assurance methodology and interpreting the TSM standard.

Tab 5 – Terms of Reference for Verifiers
MAC has undertaken a comprehensive review of the *Terms of Reference for Verifiers* to provide additional clarity to the requirements and expectations of TSM verifiers. The draft policy includes new requirements and guidance related to TSM training, qualifications, interviews with communities, site visits, and sampling methodologies. This revised policy will also be supported by an assurance methodology manual for verifiers, which is currently under development.

Tab 6 – Verification Summary Assessment Report Template
This draft template is to be completed by TSM verifiers and published on the MAC website as part of the TSM public reporting process. The aim of this summary assessment report is to provide greater transparency around third-party assessments of companies' TSM performance.

TSM Public Comment Policy – DRAFT

MAC will post relevant draft policies and protocols on the MAC website for public comment. After an initial review by the TSM Governance Team, documents will typically be posted for 30 days, though the duration of the public comment period may change depending on the timelines involved. Any comments received will be shared with the TSM Initiative Leaders and the Community of Interest Advisory Panel to inform further drafts of a given document. MAC will also publish a high-level summary of comments received, alongside a brief explanation of how the comments were or were not addressed.

TSM Claims and Labels Policy – DRAFT

Claims and labels are the messages, logos and imagery used to communicate that an entity meets a certain level of Towards Sustainable Mining (TSM) performance. Claims and labels may be used in marketing and communications materials, annual reports, and other media by companies and facilities that are members of associations implementing TSM.

TSM performance results must be reported in a manner consistent with an association's TSM self-assessment and independent verification requirements (i.e., the Mining Association of Canada's *Terms of Reference for Verifiers* and membership commitment). TSM participating companies and facilities can make claims or use labels (e.g., TSM trademark, TSM logo) in relation to TSM performance upon completion of their first self-assessment. Participating companies may indicate that they are in the process of implementing TSM if yet to complete an initial self-assessment. The TSM logo should not be distorted when used in company materials, whether printed or online.

As TSM is not a certification standard, companies cannot make claims regarding TSM certification or use the TSM logo on mined materials or products to imply certification. When making claims about TSM performance, participating companies and facilities must provide clear and descriptive information about the level of performance achieved, whether the performance is based on self-assessed or verified data, and the timeframe in which this performance was reported. For example, a participating company or facility cannot claim to "have met all TSM requirements" but must instead specify that they "met all TSM Level A or Yes requirements in 2020 based on a self-assessment" or "achieved Level AA or Yes in 25 of 30 TSM performance indicators in 2019 based on a verified assessment". Where feasible, claims about TSM performance should be accompanied by a link to the MAC website for more information about the TSM performance rating system. Participating companies can claim to "participate in TSM" so long as no claims are made regarding performance unless qualified as described above.

Companies or facilities that are not members of or associated with associations implementing TSM are not permitted to make claims about TSM performance or to use the TSM logo. In cases where such entities are using TSM to improve sustainability performance, any public communications about TSM must indicate that, while practices are thought to align with TSM requirements, actual performance has not been subject to a comprehensive TSM verification process.

The Mining Association of Canada (MAC), as the current holder of the TSM trademark, is committed to monitoring the use of TSM claims and labels. Members, verifiers, and communities of interest are expected to bring to the attention of MAC any instances of misuse or perceived misuse of claims and labels related to TSM. One mechanism for informing MAC of such instances is the TSM issues resolution mechanism. More information on this mechanism is available at *[weblink to be added]*.

Where instances of misuse are identified, MAC will engage with the entity in question to educate on proper use, working collaboratively with the entity to modify or remove any misused claims or labels. In cases where an entity is unwilling to respect TSM claims and labels requirements, appropriate action will be taken to defend the registered TSM trademark. In cases where a MAC member is not adhering to these requirements, MAC will work

collaboratively with the member to modify or remove any misused claims or labels. In cases where this approach is not successful, MAC will use the existing corrective action process for MAC member compliance with TSM, the most severe outcomes of which are suspension or withdrawal of membership.

TSM Issues Resolution Mechanism Policy – DRAFT

1. Purpose and Scope

The Mining Association of Canada (MAC) aims to ensure that any issues, concerns, or grievances related to the *Towards Sustainable Mining* (TSM) program are resolved in a timely, consistent, and transparent manner.

The TSM Issues Resolution Mechanism ('the Mechanism') is designed to consider and respond to concerns regarding:
- The accuracy of TSM performance results reported by MAC Member facilities
- The quality, comprehensiveness, or independence of an external verification of TSM performance results
- The conduct of MAC, a MAC Member, a verifier, or a third party employed by MAC or a MAC Member, in relation to TSM activities
- The development or implementation of TSM policies or procedures (e.g., protocols and guidance, program governance, verification processes, etc.)
- The interpretation or content of TSM protocols and requirements
- Other issues related to TSM that are not listed above

Information about the Mechanism will be published on the MAC website. The Mechanism will accept issues, concerns, or grievances from:
- Individuals or groups representing a community near a MAC Member facility
- Civil society or non-governmental organizations
- Customers of or investors in MAC Members
- Verifiers and auditors (except in relation to interpretation disputes that arise during the verification process, in which case these should be addressed through the separate verification dispute resolution process)
- Other individuals or groups with an interest in TSM that are not listed above

The Mechanism is not a substitute for other forms of dispute resolution, such as grievance mechanisms maintained by MAC Members (where available) or formal litigation or arbitration processes. Note that the *TSM Indigenous and Community Relationships Protocol* requires facilities to maintain a response mechanism for communities of interest to achieve a Level A performance rating. Where a MAC Member has a facility-level response mechanism in place, any concerns related to that facility's TSM performance or other matters of concern to communities of interest should be raised and resolved through that mechanism. Where appropriate, the TSM Issues Resolution Mechanism will refer issues received to the relevant company response mechanism.

2. Issues Submission

Before an issue is submitted, complainants should make all reasonable attempts to resolve the issue with the individual or entity in question. Where these efforts do not result in mutually agreed outcomes, a complainant may submit the issue to the Mechanism for consideration.

Issues can be submitted by e-mail to *[e-mail address to be added]* or by mail at:
   TSM Issues Resolution Mechanism
   Mining Association of Canada

1100-275 Slater Street
Ottawa, ON K1P 5H9
MAC can also be reached by telephone at *[telephone number to be added]*.

If the nature of the issue is such that the complainant does not wish to submit the concern to MAC directly, issues can be submitted by e-mail to Stratos, a third-party sustainability consulting firm. Stratos is a management consultancy specializing in environmental, social and governance issues. The company operates independently of MAC but is under contract to support MAC's implementation of *Towards Sustainable Mining* by facilitating the independent, multi-interest Community of Interest Advisory Panel and providing training and oversight to TSM verifiers. Stratos can be reached by e-mail at *[e-mail address to be added]* or by mail at:
TSM Issues Resolution Mechanism
Stratos Inc.
1404-1 Nicholas Street
Ottawa, ON K1N 7B7
Stratos can also be reached by telephone at *[telephone number to be added]*.

In submitting an issue, the complainant must:
- Provide basic information about themselves and/or their organization (see note on anonymous submissions below)
- Provide details about the issue and supporting evidence
- Detail any efforts made to resolve the issue directly with the individual or entity in question
- Outline expected outcomes of the issue resolution process, including options, where possible

If the complainant prefers to maintain anonymity throughout the issue resolution process, they must declare this preference at the time of submission. Note that the ability of MAC and/or Stratos to resolve an issue without knowledge of the parties involved may be limited. If anonymity cannot be granted for any reason, the complainant has the right to withdraw the issue from consideration.

Receipt of any issue submitted will be acknowledged within five business days.

Issues may be deemed inadmissible by MAC and/or Stratos if:
- The issue does not explicitly relate to TSM policies, activities, processes, or requirements.
- The issue is not supported by objective evidence, except in exceptional circumstances.
- The issue is deemed to be motivated by personal reasons or intended to gain a competitive advantage or personal benefit.

In cases where serious or urgent issues are brought forward through the Mechanism (e.g., serious physical safety risks, allegations of criminal behaviour), Stratos may engage immediately with the party in question or with relevant authorities.

3. Resolution Pathway

Depending on the nature of the issue raised, different steps of the resolution pathway may be utilized, with timelines for each step to be determined in consultation with the parties involved. In general, issues within the scope of the Mechanism will follow the below resolution pathway:

Step 1: MAC and/or Stratos will engage with the complainant to understand the issue of concern and, where possible, to provide clarifications that address the concern raised.

Step 2: If an issue is not resolved through initial discussions with the complainant, MAC and/or Stratos will offer to facilitate dialogue between the complainant and the party in question.

Step 3: If an issue is not resolved through dialogue, MAC and/or Stratos will escalate it to an Ad Hoc Issues Resolution Committee. This Committee would be convened by MAC and/or Stratos and would involve the Chair of the Governance Team and two members of the TSM Governance Team, a representative of Stratos (if not the convening body), and two representatives of the Community of Interest Advisory Panel (COI Panel). These individuals must declare any actual or potential conflict of interest in relation to the issue in question and may be disqualified from the issue resolution process depending on the nature of these disclosures.

If, upon initial consideration of an issue, MAC and/or Stratos deems it to be sufficiently complex, sensitive, or serious in nature, they may recommend that the issue be immediately escalated to the Ad Hoc Issues Resolution Committee (i.e., Step 3) without working through the prior steps.

MAC staff will participate and provide support throughout the resolution process unless Stratos determines MAC staff involvement to be inappropriate given the nature of the issue.

4. Possible Outcomes

There are several possible outcomes of the Mechanism that may be considered at any stage in the resolution pathway. Some examples are listed in the chart below, although these are not an exhaustive list.

Issue	Possible Outcomes
The accuracy of TSM performance results reported by MAC Member facilities	• Engage with the MAC member in question and, where relevant, offer additional training to support TSM interpretation and implementation • Change a publicly reported TSM score • Recommend that the issue receive greater focus during the site's next scheduled external verification
The quality, comprehensiveness, or independence of an external verification of TSM performance results	• Flag the issue to Stratos for a quality assurance review under the Verification Oversight Program • Engage with the verifier in question and, where relevant, offer additional training related to the TSM external verification process • Change an externally verified TSM score • Recommend that the issue receive greater focus during the site's next scheduled external verification
The conduct of MAC, a MAC Member, a verifier, or a third party employed by MAC or a MAC Member, in relation to TSM activities	• Engage with the individual(s) in question to ensure that expectations around their conduct in relation to TSM activities are well understood and appropriate corrective actions are taken

	• Engage, where appropriate, with the employer of the individual(s) in question to provide information on the issue in question • Issue a retraction or formal apology, where warranted
The development or implementation of TSM policies or procedures (e.g., protocols and guidance, program governance, verification processes, etc.).	• Clarify wording and/or develop additional guidance • Flag for consideration in regular TSM policy and protocol review processes
The interpretation or content of TSM protocols and requirements	• Clarify wording and/or develop additional guidance • Flag for consideration in regular reviews of these policies and protocols by the bodies involved in TSM governance • Recommend that the issue receive greater focus during a quality assurance review under the Verification Oversight Program
Other issues related to TSM that are not listed above	• Outcome dependent on the nature of the issue and the recommendations made at any stage of the resolution pathway

All issues submitted to the Mechanism will be logged and, following resolution of the issue, a short summary of the process and outcomes will be added to the log and maintained in MAC's records. An update on the contents of the log will be reported to the TSM Governance Team and COI Panel at their regularly scheduled meetings. An annual summary report will be published on the MAC website, including data on the number, type, and status of issues submitted to the Mechanism.

TSM Verifier Oversight Policy – DRAFT

The aim of the verification oversight process is to ensure that active verifiers are conforming with the *Terms of Reference for Verifiers* and that verifiers are demonstrating sound interpretation and application of TSM protocol requirements. The process would include direct oversight of verifiers, a general evaluation of effectiveness of certain elements of TSM verification, and an annual report to share findings and recommendations.

Direct oversight and review process

Direct oversight to ensure conformance with the *Terms of Reference for Verifiers* would involve an assessment of verifier competency and a review of interpretation consistency of the TSM protocols across verifiers, allowing both verifiers and MAC an opportunity for continual learning and improvement. The oversight process could be structured to ensure that each active verifier is reviewed every three to five years. This would involve document review followed by a discussion with each verifier to ask questions, collect additional information, and provide feedback. A third-party consultant would review the following information to assure conformance with the requirements of the *Terms of Reference for Verifiers*:
- Auditor credentials
- Verification plan
- Sampling strategy

The third-party consultant would also review the verifier's final verification report(s) and copies of documents used to conduct the verification (e.g., completed checklists) for a sub-set of protocols. If anomalies are detected in sampling a verifier's protocols, the sample size could be expanded to include additional protocols. Note that, if necessary, the third-party consultant may request a copy of a client document for confidential review to support the verification oversight activities. Such documents would not be provided to the third-party consultant by the verifier without a client's consent.

Any feedback or recommendations resulting from the direct oversight and review process would be shared with both the verifier and their client(s). If concerns are raised about a verifier's approach, this would not result in changes to a client's ratings, but relevant findings should be considered by the client in subsequent self-assessments.

General oversight process

A general oversight process would allow the third-party consultant to assess the effectiveness of different elements of TSM verification on an annual basis, in tandem with the direct oversight and review process. For example, the third-party consultant may choose to review a particular protocol to assess verifier consistency in interpretation or to examine how verifiers meet the competence requirements in the *Terms of Reference for Verifiers*. This process could be conducted through a survey or short telephone interviews with verifiers. Findings could inform MAC's ongoing policy work to meet evolving expectations of customers and investors, address changes in best practice for standards, and consider issues that emerge through TSM application.

Annual oversight report

The third-party consultant would ensure the transparency of the oversight process by preparing an annual report that summarizes both the direct oversight and general oversight processes. The report would include information on the types of reviews conducted and a summary of results and findings. It could also include observations or recommendations to improve the effectiveness of the verification process or to highlight areas where additional guidance may be required for verifiers or their clients. These recommendations could be informed by a survey of verifiers conducted by MAC each year to log any questions or issues related to TSM. The report would include consolidated information so as not to single out individual verifiers or clients. TSM Initiative Leaders would discuss the report each year and the report could be shared with the Community of Interest Advisory Panel for discussion or awareness. The report would also be posted on the MAC website and discussed with verifiers during the annual verifier update webinar.

TOWARDS SUSTAINABLE MINING

TERMS OF REFERENCE FOR VERIFIERS – DRAFT

August 21, 2006
Revised *[date of final revisions to be added]*

Preamble

The Mining Association of Canada (MAC) has established a process of external verification to ensure that MAC Members' reporting on *Towards Sustainable Mining* (TSM) performance indicators is consistent, accurate and transparent. These Terms of Reference for Verifiers have been developed to ensure that:

- MAC Members follow a clear and consistent process for hiring Verifiers.

- Verifiers meet minimum standards and conform to defined procedures to perform an assessment that can be relied upon by MAC Members and their communities of interest (COI).

Additional guidance to support Verifiers in adhering to these Terms of Reference is available in the *TSM Assurance Methodology Manual (currently under development).*

Definitions

Client: The MAC Member that engages a verifier to perform a TSM external verification.

Communities of Interest (COI): Individuals and groups that have an interest in, or believe they may be affected by, decisions regarding the management of a MAC Member's mining or metallurgical operations.

Community of Interest Advisory Panel (COI Panel): A formal body comprised of representatives of civil society, Indigenous communities, mining communities, organized labour, the financial sector, the mining industry, and others. The COI Panel acts in an advisory and oversight role to MAC regarding TSM.

Facility: A distinct operating unit of a company at which the TSM performance indicators can be applied. It is recognized that companies may categorize their facilities in different ways.

MAC Member: A company that is a member of MAC in good standing.

Verifier: An individual that, meeting all the requirements of these Terms of Reference, is engaged by a Client to perform an external verification of TSM performance.

Application

These standards and procedural requirements apply to all individuals requested to provide TSM external verification services for a Client.

These requirements do not apply to individuals asked to assess a MAC Member's TSM systems or performance outside of the formal external verification process.

MAC Members, with the support of the Verifier, will ensure that all requirements of these Terms of Reference are met before entering a contractual arrangement for external verification services.

A MAC Member is not required to engage a single Verifier to externally verify performance against all TSM protocols. It is permitted to contract more than one Verifier depending on their areas of technical expertise or other factors deemed relevant to the MAC Member.

Verifier Qualifications

A Verifier must, at a minimum, meet the following requirements:

1. Represent a legal business entity for the purposes of conducting business.

2. If part of a larger organization, clearly describe to the Client the individual's relationships within the organizational structure.

3. Be independent, meaning that the legal business entity that the individual represents must not have ownership ties to a MAC Member. However, a Verifier may be employed by an Associate MAC Member.

4. Not in any way convey the impression that the use of other services offered by the Verifier or their company would result in preferential treatment during the external verification.

5. Clearly identify to the Client any technical or management work that their company has been retained by the Client to perform on any of the subject areas covered by the TSM external verification. Verifiers may be engaged to verify technical or management work conducted by others employed by their company, if they can demonstrate that they were not involved in this work.

6. Not perform any activities related to the external verification of TSM indicators if they have performed technical or management work on those indicator areas at the facility being evaluated within the past three years. Technical or management work does not include external audits or verification activities conducted under other reporting frameworks for those indicator areas.

A Verifier must participate in a MAC TSM external verification workshop every three years, either in person or online, as well as an annual update webinar for Verifiers convened by MAC. Verifiers must demonstrate at least five years of experience in auditing and in the subject matter being verified, or a minimum of 10 completed audits related to the subject matter in question. At a minimum, the Verifier should hold one or more of the following audit designations:

- 5-day Management Systems Lead Auditor
- Environmental Auditor or Environmental Professional (ECO Canada)
- ISO 14001 Auditor (Environmental Management Systems)
- ISO 45001 Auditor (Occupational Health and Safety)
- Cyanide Code Verification Auditors
- Green Marine Verifier
- SA8000 5-day Auditor Training Course
- Responsible Business Alliance Labour & Ethics Lead Auditor

- Worldwide Responsible Accredited Production Lead Auditor
- Association of Professional Social Compliance Auditors (APSCA) Certified Social Compliance Auditor

Verifiers must be qualified professionals with suitable education, experience, accreditation, or knowledge to be reasonably relied on to provide advice within their area of expertise. Qualified professionals must be registered with appropriate professional organizations, adhere to those organizations' codes of ethics, and be subject to any disciplinary mechanisms. MAC may consider, at its discretion and at the request of a Verifier, additional audit designations or evidence of experience.

Verification Process

The aim of TSM is to drive performance improvement and, through demonstration of this improvement, to build trust with COI. To do so, TSM includes several steps to ensure that reported results present an accurate picture of each facility's management systems and performance. These include:

1. *Self-Assessment:* Facilities self-assess their performance against all TSM protocol indicators and publish these results on the MAC website on an annual basis.

2. *External Verification:* Every three years, a Verifier reviews a company's self-assessment to determine if there is adequate evidence to support the performance ratings reported.

3. *CEO Letter of Assurance:* In the year of external verification, the company's CEO or equivalent is required to submit a letter to MAC that confirms the external verification has been conducted in accordance with these Terms of Reference and is an accurate reflection of performance. The letter is published on the MAC website.

4. *COI Panel Post-Verification Review:* Each year, the COI Panel selects a sample of companies to present and discuss their TSM results. Through these discussions, the Panel tests whether and how facility systems are leading to performance improvements. The Panel explores the facility's challenges and any efforts to address performance gaps.

The Verifier is also subject to an oversight process whereby a third-party consultant is contracted by MAC to ensure that active Verifiers are conforming with these Terms of Reference and demonstrating sound interpretation and application of TSM protocol requirements. This oversight process includes provisions for the direct oversight and review of Verifiers, a general evaluation of effectiveness of certain elements of TSM verification, and an annual report to share findings and recommendations. The complete process is outlined in the *TSM Verifier Oversight Policy*.

Scope of Work

The scope of work prepared by the Verifier for the external verification should consider the following elements of the external verification process:

Planning for the verification

- The Verifier engages with the Client prior to external verification to ensure that all required materials have been collected and made available for external verification.

- The Verifier discusses with the Client any proposed sampling strategy for the external verification and confirm whether a site visit will be required (see advice on sampling strategies and site visits below).

- The Verifier discusses cost implications with the Client.

Conducting the verification

- The core role of the Verifier is to externally verify whether the performance level reported by the Client is consistent with the Verifier's determination, based on standard auditing tools, including interviews with company personnel and inspection of documentation.

- The Verifier may, at their discretion, expand the scope of an external verification based on the consistency of the findings.

- The Verifier must interview a selection of COI representatives to confirm evidence to support Level A or higher results submitted by the company. The selection of COI should be based on discussions between the Verifier and the Client, with the Client conducting outreach to relevant COI if required to explain the TSM verification process. Interviews with COI should result in the Verifier feeling confident in their verification of the Client's TSM performance ratings.

- The external verification is to be completed using the TSM protocols provided by MAC. These will serve as the verification working papers.

- The Verifier should indicate in the appropriate comment box of the working papers why a level has been assigned, particularly if the verified level differs from the level assigned by the Client in the self-assessment.

- If, in the opinion of the Verifier and the Client, a minor issue in meeting a criterion is identified and would require limited effort to address, the Verifier may grant the Client a period of ten working days to address the issue. The Client must then provide the Verifier with evidence that the issue has been fully addressed. The Verifier will review this evidence to inform the final performance level assigned for the facility.

Reporting of the verification results

- The Verifier, in consultation with the Client, must complete the *TSM Summary Assessment Report* for publication alongside the Client's externally verified results on the MAC website. This report allows the Verifier to provide brief commentary about the types of evidence consulted to inform the verification and any key findings.

- Should the Verifier and Client disagree on the interpretation of one or more criterion, they should jointly contact MAC to discuss this disagreement. In cases where a disagreement in interpretation requires the development of new interpretation advice, MAC will engage a sub-committee of its TSM Governance Team as well as a third party to resolve the issue.

- Once the Client has entered the verified results in the MAC online reporting system, a notification will be sent to the Verifier requesting confirmation of the results. The Verifier is expected to review and respond to these notifications in a timely manner.

Additional Guidance

External audits

The external verification at a facility may be conducted at the same time as other audits or assessments, provided the TSM protocols are followed.

In addition to the external verification, many TSM protocols include requirements for external audits. A Verifier may conduct an external audit and use this audit to meet external verification requirements under the following conditions:

- The external audit must cover all criteria in the protocol(s).
- The Verifier, acting as an external auditor, must prepare an annex to the external audit report that summarizes TSM performance.
- The company's CEO Letter of Assurance references that an external audit was used to meet the requirement for TSM external verification.

Use of sampling strategies

The Verifier must verify each TSM protocol at each of the Client's facilities for which they have been contracted to conduct an external verification. However, the Verifier has the independence to conduct sampling among a given protocol's requirements based on standard auditing practice and professional judgment. Any sampling strategy used must be disclosed in the company profile published alongside the externally verified results. Sampling cannot be used during a facility's first external verification.

Site visits

The Verifier and Client must balance verification confidence level and resources when assessing the number and location of the facilities to be visited as part of the verification process. For Canadian operations, to the extent feasible, the Client and the Verifier will arrange a site visit on the first occasion of a Verifier's verification of the facility, particularly if the company is requesting external verification of Level A or higher self-assessed results. For operations outside of Canada, where feasible, companies are encouraged to seek a local Verifier to conduct a site visit during an initial verification.

Feedback

To support the continual improvement of TSM processes, Verifiers are invited to provide feedback to MAC on any areas of the TSM protocols or related documents that they find to be unclear or inconsistent during the verification process.

TSM Summary Assessment Report

Facility Information

Name of company	
Name of facility	
Address	
Country of operation	
Products/metals produced on site	
Types of operations included in scope:	
Mining	☐
Concentrate blending	☐
Smelting	☐
Refining	☐
Other (*please explain*)	
Types of infrastructure included in scope:	
Roads	☐
Rails	☐
Ports	☐
Other (*please explain*)	

Verifier and Verification Information

Name(s) of verifier(s)	
Name(s) of verifier(s') firm(s)	
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	
Verification period	
Summary of the verification methodology	
Summary of the verification activities	

Summary of Findings

Criterion	Rating C, B, A, AA or AAA *(unless otherwise indicated)*	Comments
Indigenous and Community Relationships		
1. Community of Interest (COI) Identification		
2. Effective COI Engagement and Dialogue		
3. Effective Indigenous Engagement and Dialogue		
4. Community Impact and Benefit Management		
5. COI Response Mechanism		
Safety and Health		
1. Commitments and Accountability		
2. Planning and Implementation		
3. Training, Behaviour and Culture		
4. Monitoring and Reporting		*include link to public disclosure or reference the form of public reporting if no web link available*
5. Performance		
Crisis Management and Communications Planning (Indicate YES or NO)		
1. Crisis Management and Communications Preparedness		
2. Review		
3. Training		
Preventing of Child and Forced Labour (Indicate YES or NO)		
1. Preventing Forced Labour		
2. Preventing Child Labour		
Climate Change		
1. Corporate climate change management		

2. Facility climate change management		
3. Facility performance targets and reporting		*include link to public disclosure or reference the form of public reporting if no web link available*
Biodiversity Conservation Management		
1. Corporate biodiversity conservation commitment, accountability, and communications		
2. Biodiversity conservation planning and implementation		
3. Biodiversity conservation reporting		*include link to public disclosure or reference the form of public reporting if no web link available*
Tailings Management		
1. Tailings management policy and commitment		
2. Tailings management system and emergency preparedness		
3. Assigned accountability and responsibility for tailings management		
4. Annual tailings management review		
5. Operation, maintenance, and surveillance		
Water Stewardship		
1. Water Governance		
2. Operational Water Management		
3. Watershed-scale Planning		
4. Water Reporting and Performance		*include link to public disclosure or reference the form of public reporting if no web link available*

Statement of Verification

Complete one statement for each verifier involved in the external verification.

Statement of Verification	
The external verification was conducted in accordance with the *TSM Verifier Terms of Reference* and, accordingly, consisted primarily of interviews, data analysis, and examination (on a sample basis) of other evidence relevant to management's assertion of conformance to the requirements of the TSM performance indicators.	☐ The external verification was conducted in accordance with the *TSM Verifier Terms of Reference*.
The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.	☐ The scores in this report are considered accurate based on this verification.
Limitations	
Additional comments	
Name of verifier	
Date of statement of verification	
Signature of verifier	

Appendix 1 – TSM Responsible Sourcing Alignment Supplement

Use where applicable for verifications that incorporate other relevant standards

Check relevant boxes	Name of Standard
	International Council on Mining and Metals Mining Principles
	World Gold Council Responsible Gold Mining Principles
	Copper Mark
	Responsible Minerals Initiative Risk Readiness Assessment
	Responsible Jewelry Council
	ResponsibleSteel
	Initiative for Responsible Mining Assurance

Summary of Findings

Criterion	Rating YES/NO	Comments
Corporate Governance and Ethical Conduct		
1. Legal Compliance		
2. Code of Conduct		
3. Combating Bribery and Corruption		
4. Political Contributions		
5. Transparency of Taxes, Ownership and Transfer Pricing		
6. Accountabilities and Reporting		
7. Engagement with Corporate Communities of Interest		
Integration of Sustainable Development into Corporate Strategy and Decision Making		
8. Corporate Sustainable Development Strategy		
9. Supply Chain		
Respect for Human Rights and Labour Rights		
10. UN Guiding Principles on Business and Human Rights		
11. Conflict-Affected and High-Risk Area Due Diligence		

12. Resettlement		
13. Security and Human Rights		
14. Labour Rights		
15. Compensation for Work Related Injury, Illness & Fatality		
16. Employee Remuneration		
17. Diversity and Women in Mining		
Environmental Stewardship		
18. Environmental Risk Management		
19. Closure		
20. Pollution Prevention and Waste Management		
21. Noise and Vibration		
22. Emissions to Air		
23. Spills and Leakage		
24. Hazardous Substances		
25. Land Use and Deforestation		
26. Circular Economy		
Economic Development, Cultural Heritage and ASM		
27. Local Procurement		
28. Cultural Heritage		
29. Artisanal and Small-Scale Mining		

Apendix 2 – Finnish Mining Association TSM Mine Closure Protocol

Use when the facility is seeking ResponsibleSteel recognition

Criterion	Rating C, B, A, AA or AAA	Comments
Mine Closure		
1. Mine Closure Policy and Operational Guidelines		
2. Mine Closure Planning and Management System		