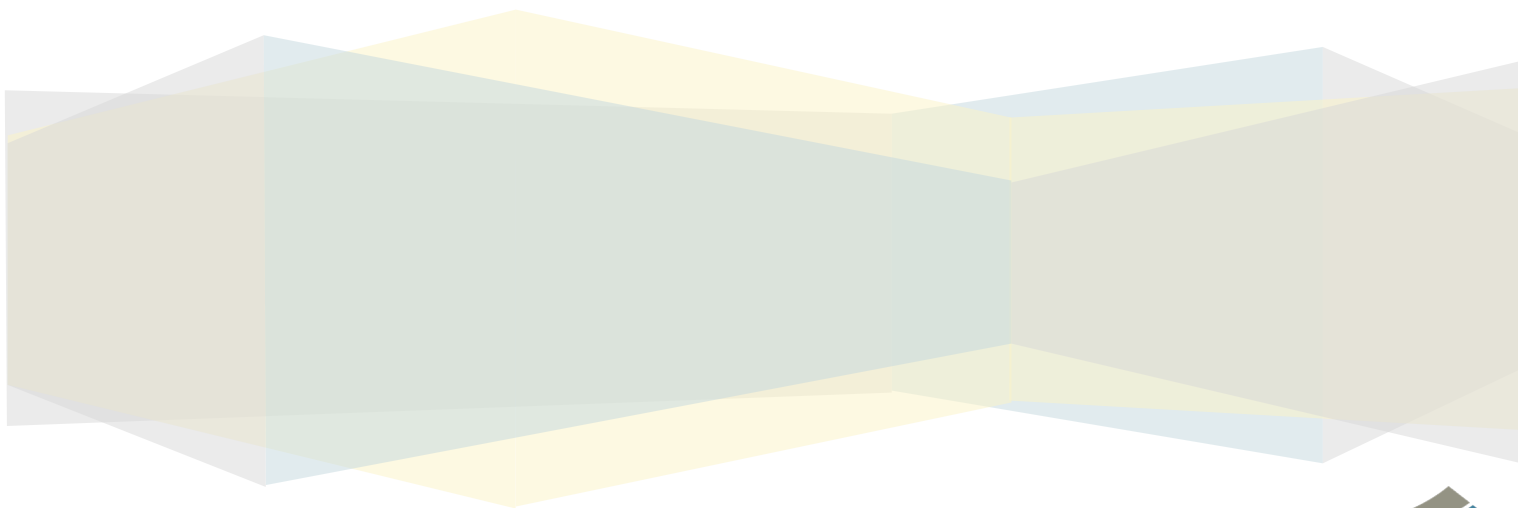




RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

Towards Sustainable Mining

Responsible Sourcing Alignment Supplement





TSM RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

A tool for aligning with other mining sustainability standards and frameworks focused on responsible sourcing.

Purpose

This *TSM Responsible Sourcing Alignment Supplement* ('supplement') was developed to support companies that are implementing the TSM standard alongside the following additional standards:

- International Council on Mining and Metals (ICMM) Mining Principles (MPs)
- World Gold Council (WGC) Responsible Gold Mining Principles (RGMPs)
- Responsible Minerals Initiative (RMI) Risk Readiness Assessment (RRA), including the International Copper Alliance (ICA) Copper Mark (CM)

It also serves to qualify mine sites for ResponsibleSteel (RS) recognition.

The purpose of this supplement is to support a single, integrated, streamlined reporting and assurance process for facilities using TSM that elect to use the TSM processes to demonstrate that they meet the requirements for one or more of the above-listed standards.

As with the TSM Protocols, the criteria contained in this supplement are listed in the main body of the document as well as in the form of a checklist in the appendix of this supplement.

Guidance on the Use of this Supplement

Who is this supplement for?

This supplement is intended for those companies that are already using TSM or choose to use TSM as their primary sustainability standard but are also apply any of the above-listed standards or would like to be recognized under the ResponsibleSteel system. It is intended to help streamline the reporting and assurance process by bringing in additional subject matter criteria required by one or more of the above standards but not addressed within the existing eight TSM protocols.

Is this supplement part of the TSM Condition of Membership?

This supplement is not part of the TSM Condition of Membership and is intended to be applied on a voluntary basis where there is an opportunity to use the TSM reporting and assurance process to meet the requirements of other standards. Additionally, as each national association implementing TSM can adopt or develop their own protocols, the contents of the supplement may need to be adapted on a country-by-country basis. For example, the national association in Finland, FinnMin, has developed a closure protocol; so, the closure requirement in this supplement will not be needed for Finnish mines implementing TSM.

When should this supplement be used?

When a company elects to use the supplement, it should be incorporated into both the self-assessment and external verification processes. Incorporating it into the self-assessment process will help to ensure the required systems and processes are implemented such that they can be confirmed during the external verification process. As with the TSM Protocols,





information provided in the self-assessment allows verifiers to understand where evidence can be found and to prepare a verification plan that focuses their on-site time efficiently.

When using the supplement, is it necessary to apply all the criteria?

Not all criteria in the supplement are applicable to all facilities (e.g., tailings management, artisanal and small-scale mining, cyanide, etc.). Where a requirement is determined to be Not Applicable (N/A) at a facility, then an assessment of N/A can be applied. Additionally, not all criteria are applicable to all standards covered by this supplement. Each relevant criterion contains a reference to a corresponding criterion for the relevant standards in the righthand column. Facilities should apply the criteria for the standards with which they are seeking alignment.

If facilities want to qualify under the ResponsibleSteel system, they will need to meet all elements of the supplement indicated as corresponding to a ResponsibleSteel requirement in the RS column and have their performance verified on site by an external verification service provider. Further information on how to be recognized under ResponsibleSteel can be found on <https://www.responsiblesteel.org>.

Does the supplement need to be applied at all facilities owned by a company?

It is not necessary to apply the supplement at all facilities. It is only necessary to apply the supplement to facilities choosing to use the TSM reporting and assurance processes to address the requirements of one or more of the above-listed standards. However, the company must assess how to apply requirements from each relevant standard, framework, or certification to ensure all appropriate terms have been addressed. For example, both the RGMPs and the ICMM MPs have corporate/company-wide requirements as well as site level requirements that must be considered to ensure that credit can be granted. There are also assurance requirements from other frameworks which may need to be met before credit can be granted. For example, conformance with the RGMPs is at the company level, even though site-level assurance is a critical part of the process. If a site meets all the requirements of this supplement, the company can state that the RGMP requirements have been met at that site, but it cannot say indicate that the company is RGMP compliant.

Why is the wording of some of the criteria different than the source material in the standards?

To develop a single supplement that meets the requirements of all of the above-listed standards, it was necessary to ensure each criterion satisfied the requirements of all the applicable standards. In some cases, this meant incorporating language from one standard that has requirements not included in another standard. For example, on the issue of gender and diversity, the language in the RGMPs contains additional requirements that are not included in the CM, RRA or MPs. In this case, the language from the RGMPs was used to ensure the criterion in the supplement would meet the requirements of all standards. Facilities using the supplement should always revert to the source material from each standard as the definitive reference point for conformance with individual standards. Again, drawing on the gender and diversity example, if a facility is not applying the RGMPs but is applying the other





three standards, they may elect to use the source material from those three standards and not take on the additional requirements contained in the RGMPs.

Performance Criteria

This supplement contains criteria that have been organized into five thematic sections based on how they are presented in the ICMM MPs, WGC RGMPs, the RRA/CM and RS:

1. Corporate Governance and Ethical Conduct
2. Integration of Sustainable Development into Corporate Strategy and Decision-Making
3. Respect for Human Rights and Labour Rights
4. Environmental Stewardship
5. Social, Economic, and Institutional Development





1. CORPORATE GOVERNANCE AND ETHICAL CONDUCT

Purpose

To ensure the application of ethical business practices and sound systems of corporate governance and transparency to support sustainable development

	ICMM MP	RGMP	CM/RRA	RS
Through interview and review of documentation, determine:				
1 Legal compliance				
<ul style="list-style-type: none"> Establish and maintain processes to ensure compliance with applicable laws 	1.1	1.1	1	2.3
2 Code of conduct				
<ul style="list-style-type: none"> Maintain a code of conduct to make clear the standards with which employees, suppliers and contractors are expected to comply with. 	1.3	1.2	n/a	1.1
<ul style="list-style-type: none"> Actively promote awareness of the code and implement systems to monitor and ensure compliance. 	n/a	1.2	n/a	1.1
3 Combating bribery and corruption				
<ul style="list-style-type: none"> Implement policies, practices and controls that prohibit and effectively prevent bribery (including facilitation payments) and corruption in all their forms, conflicts of interest and anti-competitive behavior by employees, agents or other company representatives. 	1.2	1.3	2	2.4
4 Political contributions				
<ul style="list-style-type: none"> Publicly disclose the value and beneficiaries of financial and in-kind political contributions, whether directly or through an intermediary. 	1.5	1.4	n/a	n/a
5 Transparency of Taxes, Ownership and Transfer Pricing				
<ul style="list-style-type: none"> Publish tax, royalty, and other payments to governments annually by country and project (<i>for Canadian companies this is accomplished through compliance with the Extractive Sector Transparency Measures Act</i>). Encourage governments to promote greater transparency around revenue flows, mining contracts and the beneficial ownership of license holders. 	Mineral Revenue PS, 10.2	1.5	32	n/a
<ul style="list-style-type: none"> Implement processes to ensure and demonstrate that transfer pricing outcomes are in line with fair business practices and value creation. 	n/a	1.6	n/a	n/a
<ul style="list-style-type: none"> Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) 	10.2	1.5	32	n/a





<p>6 Accountabilities and reporting</p>	1.4	1.7	n/a	1.2
<ul style="list-style-type: none"> Accountability for sustainability performance is assigned at Board and/or Executive Committee level. Report annually on economic, social, and environmental performance at the corporate level using the GRI Sustainability Reporting Standards and independently assure this report where equivalency with the ICMM MPs is sought or as per the RGMP reporting requirements where equivalency with the RGMPs is sought. 	10.3, 10.4	1.7	n/a	n/a
<p>7 Engagement with Corporate Communities of Interest</p>	10.1	2.2	n/a	n/a
<ul style="list-style-type: none"> Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner. 				

2. INTEGRATION OF SUSTAINABLE DEVELOPMENT INTO CORPORATE STRATEGY AND DECISION MAKING

Purpose

To pursue continual improvement in integrating sustainable development in corporate strategy and decision-making processes.

	ICMM MP	RGMP	CM/RRR	RS
<p>Through interview and review of documentation, determine that:</p>				
<p>8 Corporate Sustainable Development Strategy</p> <ul style="list-style-type: none"> Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation, and closure of facilities. 	2.1	n/a	n/a	1.1, 1.2
<p>9 Supply Chain</p>				
<ul style="list-style-type: none"> Adopt and publish a Supply Chain Policy and support contractors and suppliers to operate responsibly and to standards of ethics, safety, health, human rights, and social and environmental performance comparable to those of the reporting company. 	2.2	3.1	4	2.2
<ul style="list-style-type: none"> Conduct due diligence to identify human rights, corruption and conflict risks associated with facility and supply chain activities and practices by joint venture partners with the intention of preventing adverse impacts and supporting the adoption of responsible practices. Exercise risk-based due diligence on those entities to which the facilities’ products are sold to. 	2.2	2.3	n/a	2.2





3. RESPECT FOR HUMAN RIGHTS AND LABOUR RIGHTS

Purpose

To pursue continual improvement in the areas of human rights and labour rights that are not addressed by the TSM protocols.

	ICMM MP	RGMP	CM/RRA	RS
Through interview and review of documentation, determine that:				
10 UN Guiding Principles on Business and Human Rights <ul style="list-style-type: none"> Adopt and implement policies of the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence, and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that the facility has caused or contributed to. 	3.1	2.3,5.1, 5.2	25	5.1, 6.2
11 Conflict-Affected and High-Risk Area Due Diligence <ul style="list-style-type: none"> Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas when operating in – or sourcing from – a conflict-affected or high-risk area. Implementation of the Conflict Free Gold Standard fully addresses this criterion. 	4.2	5.4	31	5.3
12 Resettlement <ul style="list-style-type: none"> Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people. 	3.2	7.8	29	7.4
13 Security and Human Rights <ul style="list-style-type: none"> Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights. (This requirement is in line with MAC’s membership commitment on the Voluntary Principles for those members that conduct external assurance on their security structures.) 	3.3	5.3	27	5.2
14 Labour Rights <ul style="list-style-type: none"> Respect the rights of workers by eliminating harassment and discrimination, respecting freedom of association and collective bargaining, and providing a mechanism to 	3.4	6.2, 6.3, 6.4	7, 8, 13	4.3, 4.4





<p>address workers grievances.</p> <ul style="list-style-type: none"> • A policy is in place prohibiting threats or use of undignified disciplinary practices with procedures developed in collaboration with workers to investigate and address related risks and alleged incidents of undignified disciplinary practices being used or threatened to be used. Related policies and procedures extend to employment and recruitment agencies. 	n/a	n/a	n/a	4.5
<ul style="list-style-type: none"> • A mechanism is in place for workers to voice concerns without fear of reprisal, intimidation or harassment and have those concerns investigated in an impartial and timely manner. The mechanism includes communication to complainants about outcomes and respects the confidentiality of the complainant. Workers are aware of this mechanism and how to access it. 	n/a	n/a	n/a	4.6
<p>15 Compensation for Work-related Injury, Illness & Fatality</p> <ul style="list-style-type: none"> • Processes are in place to support injured or ill workers including their rehabilitation. Records are kept related to work related injury, illness, and fatality. In jurisdictions where compensation for work-related injury, illness or fatality is not provided by a government scheme, the company commits to and has procedures for determining and providing compensation, including for dependents in the event of fatality. 	n/a	n/a	n/a	3.4
<p>16 Remuneration and Terms of Employment</p> <ul style="list-style-type: none"> • Remunerate employees with fair wages and benefits that equal or exceed legal requirements or represent a competitive wage within that job market or a living wage (whichever is higher) and assign regular and overtime working hours within legally required limits. This also applies to employment and recruitment agencies. 	3.5	6.1	10 & 11	4.3, 4.8, 4.9
<ul style="list-style-type: none"> • Employment terms are documented in writing and communicated at the beginning of employment and when terms change, as well as when workers are hired through employment and recruitment agencies. 	n/a	n/a	n/a	4.7
<p>17 Diversity and Women in Mining</p> <ul style="list-style-type: none"> • Implement policies and practices to promote diversity at all levels of the company, including the representation and inclusion of historically under-represented groups and report on progress. 	3.8	6.5	9	4.3
<ul style="list-style-type: none"> • Committed to identifying and resolving barriers to the advancement and fair treatment of women in our workplaces. Through employment, supply chain, training, and community investment programs, aim to contribute to the socio-economic empowerment of women in the communities associated with facilities 	3.8	6.6	n/a	4.3





4. ENVIRONMENTAL STEWARDSHIP

Purpose

To pursue continual improvement in environmental performance issues not addressed by the TSM protocols, such as mine closure, waste management and land use considerations.

	ICMM PE	RGMP	CM/RRA	RS
Through interview and review of documentation, determine that:				
18 Environmental Risk Management	4.3	8.1	14	2.1
<ul style="list-style-type: none"> Demonstrate that an environmental management system (EMS) is implemented that is functionally equivalent to an internationally recognized EMS standard (e.g., ISO 14001). 				
19 Closure	6.1	9.4	22	12.1
<ul style="list-style-type: none"> Plan for the social and environmental aspects of mine closure in consultation with authorities, employees, affected communities and other relevant stakeholders. Make financial and technical provision to ensure planned closure and post-closure commitments are realized, including the rehabilitation of land, beneficial future land use, preservation of water sources and prevention of acid rock drainage and metal leaching. 				
20 Pollution Prevention and Waste Management	6.4	8.1	18, 20	n/a
<ul style="list-style-type: none"> Apply the mitigation hierarchy to prevent pollution, manage releases and waste (hazardous, non-hazardous, and inert), and address potential impacts on human health and the environment. 				
<ul style="list-style-type: none"> Heap leach and large-scale water infrastructure are managed consistently with international recognized good practice guidance. 	n/a	8.2	n/a	n/a
21 Noise and Vibration	n/a	n/a	n/a	9.1
<ul style="list-style-type: none"> There is a commitment to prevent and continually work to reduce noise and vibration. Target or threshold levels have been established in collaboration with affected communities based on baseline values and an ongoing monitoring program is in place to assess performance. Where targets or thresholds are not being consistently met, time-bound action plans are in place. 				
22 Emissions to Air	n/a	n/a	n/a	9.2
<ul style="list-style-type: none"> There is a commitment to prevent and continually work to reduce adverse emissions to air. Potential sources of these emissions have been identified and a monitoring program is implemented. Target or threshold levels 				





<p>have been established with time-bound actions plans in place where these levels are not being consistently met. The effectiveness of the site's air emissions performance is externally verified on a predetermined frequency at least every three years.</p>				
<p>23 Spills and Leakage</p> <ul style="list-style-type: none"> A preventative maintenance program is implemented aimed at preventing spills and leakages that includes a risk assessment of potential sources of spills and leakages, regular inspections and testing, record keeping and corrective action processes. Based on the risk assessment results, emergency procedures are in place to mitigate and remediate the effects of spills or leakages that include procedures to assess impacts of spills and leakage and the effectiveness of mitigation and remediation measures. The effectiveness of the preventative maintenance program and readiness of the emergency procedures are internally assessed annually and externally verified on a predetermined frequency at least every three years. 	n/a	n/a	n/a	9.3
<p>23 Hazardous Substances</p> <ul style="list-style-type: none"> Assess the hazards of the products of mining according to UN Globally Harmonized System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate. Identify and manage potential risks relating to the transportation, handling, storage, and disposal of all hazardous materials. Where cyanide is used ensure that arrangements for the transport, storage, use and disposal of cyanide are in line with the standards of practice set out in the International Cyanide Management Code The facility commits to not using mercury to extract gold in processing facilities, not accept gold produced by third parties using mercury and not opening mines with mercury as a primary product. This includes a commitment to support Minamata Convention's objective of reducing mercury emissions for the protection of human health and the environment. The facility has identified point source mercury emissions to the atmosphere arising from its activities and has minimized them. Captured mercury will only be used or sold as deemed acceptable by international conventions. The facility also reports significant point source mercury air emissions from operations consistent with commitment to report in accordance with 	6.4, 8.2	n/a	n/a	n/a
	n/a	8.3	n/a	n/a
	n/a	8.3	n/a	n/a
	6.4, Mercury PS	8.4	n/a	n/a





<p>the GRI framework. <i>This criterion is only applicable to facilities where mercury is a factor.</i></p>				
<p>24 Land Use and Deforestation</p> <ul style="list-style-type: none"> For new projects, meaningful consideration to the land access needs of nearby communities and to the preservation of biodiversity will be given in determining the project footprint. 	n/a	9.3	n/a	n/a
<ul style="list-style-type: none"> The facility will aim to minimize deforestation arising from its activities 	n/a	9.3	n/a	n/a
<p>25 Circular Economy</p> <ul style="list-style-type: none"> In project design, operation, and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials. 	8.1	n/a	n/a	n/a





5. ECONOMIC DEVELOPMENT, CULTURAL HERITAGE AND ARTISINAL AND SMALL-SCALE MINING

Purpose

To pursue continual improvement in areas of social performance not addressed through the TSM protocols and contribute to the social, economic, and institutional development of host countries and communities.

	ICMM MP	RGMP	CM/RRA	RS
Through interview and review of documentation, determine that:				
26 Local Procurement <ul style="list-style-type: none"> Enable access by local enterprises to procurement and contracting opportunities across the project lifecycle, both directly and by encouraging larger contractors and suppliers, and by supporting initiatives to enhance economic opportunities for local communities. 	9.2	3.2	n/a	n/a
27 Cultural Heritage ¹ <ul style="list-style-type: none"> Identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce, and compensate for adverse impacts on cultural heritage. 	4.3	7.7	24	n/a
28 Artisanal and Small-Scale Mining (ASM) <ul style="list-style-type: none"> Where artisanal and small-scale miners (ASM) are present, support access to legitimate markets for ASM who respect applicable legal and regulatory frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalisation. Where mercury is in use by AMS, consider supporting government initiatives to reduce and eliminate the use of mercury. Collaborate with government, where appropriate, to support improvements in environmental and social practices of local Artisanal and Small-scale Mining (ASM) 	n/a	3.3	25	n/a
	9.4	n/a	n/a	n/a

¹ Cultural heritage criteria are also included in the *Indigenous and Community Relationships Protocol Indicator 3 Effective Indigenous Engagement and Dialogue Level A* which need to be addressed by the facility in conjunction with this supplement.





APPENDIX 1: TSM SELF-ASSESSMENT CHECKLIST

Responsible Sourcing Alignment Supplement

Facility Name:		Company Name:	
Assessed By:		Date Submitted:	

Supporting Documentation / Evidence:	
NAME OF DOCUMENT	LOCATION

Interviewees:			
NAME	POSITION	NAME	POSITION





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 1: CORPORATE GOVERNANCE AND ETHICAL CONDUCT					
1. Legal Compliance	Have processes been established to ensure compliance with applicable laws and are those processes being maintained?				
2. Code of Conduct	Is a code of conduct in place to make clear the standards with which employees and contractors are expected to comply with?				
	Is the code being communicated to employees and contractors?				
	Have processes been implemented to monitor and ensure compliance with the code?				
3. Combating Bribery and Corruption	Have policies, practices and controls been implemented to combat bribery and corruption in all their forms, conflicts of interest and anti-competitive behavior by employees, agents or other company representatives?				
	Are facilitation payments publicly disclosed where they are not prohibited by law?				
4. Political Contributions	Are the value and beneficiaries of financial and in-kind political contributions, whether directly or through an intermediary publicly disclosed?				
5. Transparency of Taxes, Ownership and Transfer Pricing	Are tax, royalty and other payments to governments annually by country and project publicly disclosed? (<i>Note: ESTMA reports satisfy this requirement for Canadian companies</i>)				
	Are processes implemented to ensure and demonstrate that transfer pricing outcomes are in line with fair business practices and value creation?				
	Is Public support for the implementation of the Extractive Industries Transparency Initiative (EITI) demonstrated by the company?				
6. Accountability	Has accountability for sustainability performance been assigned at Board and/or Executive Committee level?				





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
	<p>For ICMM equivalency, does reporting occur annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards and is the reporting independently assured?</p> <p>For RGMP equivalency, is the reporting done as per the RGMP reporting requirements?</p>				
7. Engagement with Corporate COI	<p>Have key corporate-level external stakeholders on sustainable development issues been identified and are they being engaged with in an open and transparent manner?</p>				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 2: INTEGRATION OF SUSTAINABLE DEVELOPMENT INTO CORPORATE STRATEGY AND DECISION MAKING					
8. Corporate Sustainable Development Strategy	<p>Have sustainable development principles been integrated into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities?</p>				
9. Supply Chain Policy	<p>Has a Supply Chain Policy been adopted and published that supports contractors and suppliers to operate responsibly to standards of ethics, safety, health, human rights and social and environmental performance comparable to those standards within the reporting company?</p>				
	<p>Are Due diligence processes conducted to identify human rights, corruption and conflict risks associated with facility and supply chain activities and practices by joint venture partners with the intention of preventing adverse impacts?</p>				
	<p>Are processes in place to exercise risk-based due diligence on those entities to which the facilities' products are sold to?</p>				





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 3: RESPECT FOR HUMAN RIGHTS AND LABOUR RIGHTS					
10. Human Rights Due Diligence	Has a policy or commitment to respect human rights been developed that supports the UN Guiding Principles on Business and Human Rights?				
	Has the facility undertaken human rights due diligence?				
	Are processes in place to remediate and/or cooperate in the remediation of adverse human rights impacts that the facility has caused or contributed to?				
11. Conflict-Affected and High-Risk Area Due Diligence	Has the facility undertaken risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas when operating in – or sourcing from – a conflict-affected or high-risk area? (<i>Note: implementation of the WGC Conflict Free Gold Standard fully addresses this criterion</i>)				
12. Resettlement	Are involuntary physical or economic displacement of families and communities being avoided?				
	Where involuntary displacement is not possible, has the mitigation hierarchy been implemented and are actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people being implemented?				
13. Security and Human Rights	Has a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights been implement, based on risk? (<i>Note: this requirement is in line with MAC's membership commitment on the Voluntary Principles and is deemed to have been addressed and externally assured by those members that conduct external assurance on their security systems and processes.</i>)				





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	QUESTIONS	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 3: RESPECT FOR HUMAN RIGHTS AND LABOUR RIGHTS - Continued					
14. Labour Rights	Is the facility able to demonstrate actions taken to respect the rights of workers by eliminating harassment and discrimination?				
	Can the facility demonstrate it is respecting freedom of association and collective bargaining?				
	Is a mechanism to address workers grievances in place?				
	Is a policy in place prohibiting threats or use of undignified disciplinary practices?				
	Are procedures in place and developed in collaboration with workers to investigate and address related risks and alleged incidents of undignified practices being used or threatened to be used?				
	Is there a mechanism in place for workers to voice concerns without fear of reprisal, intimidation or harassment and have those concerns investigated in an impartial and timely manner?				
	Does the mechanism include communication to complainants about outcomes and does it respect the confidentiality of the complainant?				
	Are workers aware of the mechanism and how to access it?				
15. Compensation for Work-related Injury, Illness & Fatality	Are processes in place to support injured or ill workers including their rehabilitation?				
	Are records kept related to work related injury, illness, and fatality?				
	Are there a company commitment and procedures for determining and providing compensation, including for dependents in the event of fatality? (This only applies in jurisdictions where compensation for work-related injury, illness or fatality is not provided by a government scheme)				



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16. Employee Remuneration and Terms of Employment	Can the facility demonstrate that employees are remunerated with fair wages and benefits that are equal to or exceed legal requirements or represent a competitive wage within that job market (whichever is higher)?				
	Can the facility demonstrate that assigned regular and overtime working hours within legally required limits?				
	Are employment terms documented in writing and communicated at the beginning of employment and when terms change, as well as when workers are hired through employment and recruitment agencies?				
17. Diversity and Women in Mining	Have policies and practices been implemented to promote diversity at all levels of the company, including the representation and inclusion of historically under-represented groups and report on progress?				
	Does the company have a commitment to identify and resolve barriers to the advancement and fair treatment of women in our workplaces?				
	Does the facility aim to contribute to the socio-economic empowerment of women in the communities associated with facilities through employment, supply chain, training and community investment programs?				





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 4: ENVIRONMENTAL STEWARDSHIP					
18. Environmental Risk Management	Demonstrate that an environmental management system (EMS) is implemented that is functionally equivalent to an internationally recognized EMS standard (e.g. ISO 14001)				
19. Closure	Has a plan been developed for the social and environmental aspects of mine closure?				
	Has the plan been developed in consultation with authorities, employees, affected communities and other relevant stakeholders?				
	Are financial and technical provisions in place to ensure planned closure and post-closure commitments are realized, including the rehabilitation of land, beneficial future land use, preservation of water sources and prevention of acid rock drainage and metal leaching? (<i>Note: security bonding provided under regulatory requirements satisfy this requirement</i>)				
20. Pollution Prevention and Waste Management	Is the mitigation hierarchy applied to prevent pollution, manage releases and waste (hazardous, non-hazardous and inert), and address potential impacts on human health and the environment?				
	Where they are present, are heap leach and large-scale water infrastructure managed consistently with international recognized good practice guidance? (<i>Note: the TSM Tailings Management Guide is considered internationally recognized good practice guidance</i>).				
21. Noise and Vibration	Is there is a commitment to prevent and continually work to reduce noise and vibration?				
	Have target or threshold levels been established in collaboration with affected communities based on baseline values?				
	Is an ongoing monitoring program in place to assess performance?				
	Where targets or thresholds are not being consistently met, are time-bound action plans in place?				





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 4: ENVIRONMENTAL STEWARDSHIP - Continued					
22. Emissions to Air	Is there a commitment to prevent and continually work to reduce adverse emissions to air?				
	Have potential sources of these emissions been identified?				
	Has a monitoring program been implemented?				
	Have target or threshold levels been established with time-bound actions plans in place where these levels are not being consistently met?				
	Is the effectiveness of the site's air emissions performance externally verified on a predetermined frequency at least every three years?				
23. Spills and Leakage	Is a preventative maintenance program implemented aimed at preventing spills and leakages that includes a risk assessment of potential sources of spills and leakages, regular inspections and testing, record keeping and corrective action processes?				
	Based on the risk assessment results, are emergency procedures in place to mitigate and remediate the effects of spills or leakages that include procedures to assess impacts of spills and leakage and the effectiveness of mitigation and remediation measures?				
	Are the effectiveness of the preventative maintenance program and readiness of the emergency procedures internally assessed annually and externally verified on a predetermined frequency at least every three years?				
24. Hazardous Substances	Has a hazard assessment been conducted on the products of mining according to UN Globally Harmonized System of Hazard Classification and Labelling or equivalent relevant regulatory systems?				
	Are product hazards and safe use communicate through safety data sheets and labelling as appropriate?				
	Are potential risks relating to the transportation, handling, storage and disposal of all hazardous materials identified and managed?				





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 4: ENVIRONMENTAL STEWARDSHIP - Continued					
25. Hazardous Substances – cont.	Where cyanide is used, are the transport, storage, use and disposal of cyanide in line with the standards of practice set out in the International Cyanide Management Code?				
	Where appropriate, is there a commit in place to not using mercury to extract gold in processing facilities nor accept gold produced by third parties using mercury? <i>(Note: this criterion is only applicable to facilities where mercury is a byproduct)</i>				
	Does the commitment include support for the Minamata Convention’s objective of reducing mercury emissions for the protection of human health and the environment? <i>(Note: this criterion is only applicable to facilities where mercury is a byproduct)</i>				
	Have any point sources of mercury emissions to the atmosphere arising from its activities been identified and have those point sources been minimized. <i>(Note: this criterion is only applicable to facilities where mercury is a factor)</i>				
	If sale or use of mercury occurs, is it done so as deemed acceptable by international conventions? <i>(Note: this criterion is only applicable to facilities where mercury is a byproduct)</i>				
	Does the facility report significant point sources of mercury air emissions from operations consistent with the commitment to report in accordance with the GRI framework as per criterion 6?				
26. Land Use and Deforestation	For new projects, can the facility demonstrate that meaningful consideration has been given to the land access needs of nearby communities and to the preservation of biodiversity in determining the project footprint?				
	Can the facility demonstrate that it aims to minimize deforestation arising from its activities?				
27. Circular Economy	In project design, operation and de-commissioning, has the facility implemented cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials?				





RESPONSIBLE SOURCING ALIGNMENT SUPPLEMENT

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
SECTION 5: SOCIAL, ECONOMIC AND INSTITUTIONAL DEVELOPMENT					
28. Local Procurement	Are there programs or processes in place to enable access by local enterprises to procurement and contracting opportunities across the project lifecycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities? <i>(Note: Facilities that can demonstrate inclusion of local procurement into their community benefit work as part of Indicator 4 in the Indigenous and Community Relationships Protocol are deemed to have addressed this requirement)</i>				
29. Cultural Heritage	Identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce and compensate for adverse impacts on cultural heritage.				
30. Artisanal and Small-Scale Mining (ASM)	Where artisanal and small-scale miners (ASM) are present, can the facility demonstrate that it supports access to legitimate markets for ASM who respect applicable legal and regulatory frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalization?				
	Where mercury is in use by AMS, can the facility demonstrate that it considers supporting government initiatives to reduce and eliminate the use of mercury?				
	Has the facility collaborated with government, where it is appropriate, to support improvements in the environmental and social practices of local Artisanal and Small-scale Mining?				





For more information about the TSM initiative, visit:

The Mining Association of Canada
www.mining.ca/tsm

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