

Responsible Mining Index

Draft Methodology: Response to Comments

May 2017



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Responsible Mining Index

The overarching purpose of the Responsible Mining Index (RMI) is to see the full potential of minerals and metals mining positively benefit economic development, improve the lives of people and respect the environments of producing countries, particularly in some of the world’s poorest regions, while ensuring that mining companies also benefit in a fair and viable way.

With this in mind, the goal of the Responsible Mining Index is to encourage continuous improvement in responsible mining by transparently ranking the performance of some of the world’s largest mining companies on economic, environmental, social and governance (EESG) issues, and highlighting leading practice.

The Responsible Mining Foundation (RMF) defines responsible mining as mining that demonstrably respects and protects the interests of people and the environment, and contributes discernibly and fairly to broad economic development of the producing country.

The Index will be published every two years and will rank 30 of the world’s largest mining companies, with a view to have a global impact on the mining industry. Their relative performance will be scored largely at corporate level, although a limited number of indicators will focus on the performance of approximately 150 mining operations. The Index will cover a range of publicly listed, state-owned, and private companies. The emphasis will be on leading practice and learning.

The key characteristics of the RMI approach include:

- relative ranking of companies, not a benchmark, certification or standard;
- encourages continuous improvement;
- affirms leading practice and learning;
- reflects the priorities of society at large;
- systems-based perspective, covering economic, environmental, social and governance (EESG) in an integrated manner;
- complements and amplifies the work of related initiatives, standards, principles and reporting mechanisms;
- covers publicly-listed, state-owned, and private companies;
- approaches EESG considerations from a management systems perspective;
- includes on-the-ground reality check at mine-site level;
- transparent methodology and reporting;
- results freely available as a public good.

The analytical framework of RMI (shown in Figure 1) includes six issue areas and three measurement areas. In addition, there are four transversal issues in the RMI methodology: gender, human rights, communities and transparency.:

Figure 1. RMI analytical framework

Issue Areas	Measurement Areas		
	Commitment	Action	Effectiveness
Economic Development	X	X	X
Business Conduct	X	X	X
Lifecycle Management	X	X	X
Community Wellbeing	X	X	X
Working Conditions	X	X	X
Environmental Responsibility	X	X	X

A. Introduction

Following a feasibility study, which supported the development of the Responsible Mining Index (RMI), the methodology has been developed with the help of a wide range of stakeholders and experts from around the world, including those who participated in roundtable consultations, held from June 2016 to March 2017.

As part of the development process, the Draft Methodology was published for a period of public comment during the six-week public comment period, from 9 February to 24 March 2017. The Executive Summary of the Draft Methodology was also made available in French, Spanish, Russian and Chinese on the RMI website.

The Responsible Mining Foundation wishes to express its sincere thanks to the many individuals and organisations who provided comments and recommendations, including mining-affected community members, representatives of local community associations, national and international NGOs, government bodies, industry associations, multi-stakeholder initiatives, multilateral organisations, investors, academics, consultants and others. The breadth and depth of the input received have been invaluable in further strengthening the RMI methodology.

All comments with references to specific aspects of the RMI methodology, and a synthesis of the main points raised during the roundtable consultations, have been published on the RMI website:

www.responsibleminingindex.org.

The comments and recommendations received from both individuals and organisations have been reviewed and carefully considered in the refinement and finalisation of the RMI methodology.

The formal methodology report is under preparation and will be published in June 2017.

Publication of the first Responsible Mining Index report is planned for early 2018.

This report responds to the comments received during the consultations and public comment period. This includes:

- Brief overview of the main points made in the **general feedback** received
- **Frequently Asked Questions (FAQs)** – covering responses to some of the more commonly raised issues.
- **Revisions to the methodology** – an overview of the revisions which are being made in response to the feedback.
- **Detail of changes to indicators** – an indicator-by-indicator description of the revisions made to company-level indicators (Appendix 2) and mine-site indicators (Appendix 3) from the Draft Methodology.

Please note that, unless otherwise stated, the indicator codes used in this report refer to the revised set of indicators, as listed in the Appendix 1.

B. General comments

The formal and informal responses included positive encouragement, with a **strong level of support** for the overall approach underpinning the RMI methodology, specifically:

- Its focus on encouraging continuous improvement and highlighting leading practice in company management, and acknowledgement of the leading practices already happening;
- Its consideration of a range of levels of performance, rather than setting a single benchmark of expected performance;
- The emphasis on public disclosure to support emerging practice on transparency;
- The inclusion of mine-site-level indicators to complement the company-level indicators;
- Its systematic and broad coverage of the major economic, environmental, social and governance (EESG) issues associated with mining;
- Its integration of transparency, gender and human rights issues;
- Its focus on questions which some companies are already asking themselves;
- The inclusion of 'effectiveness' as one of the three Measurement Areas, in addition to commitment and action; and
- The detailed and thoroughly referenced topic profiles providing context and more extensive definition of the scope and focus for each indicator.

C. Frequently asked questions (FAQs)

The feedback received raised several consistent queries on a variety of topics. This section covers some of the more common questions. In order to provide a comprehensive response to the questions raised, some of the answers include information already covered in the Draft Methodology.

C.1 Company selection and scope

How will companies be selected to be included in the Index?

In line with the purpose and goal of RMI, the Index will rank 30 companies selected from among of the world's largest mining companies, as measured by value of production. The scope of the Index will include publicly-listed, state-owned and private companies.

The current number of companies in the Index is based on covering a sufficient number to account for a significant proportion (approximately 25 per cent) of global mining production and a selection of high-profile and globally dispersed companies which are highly influential in shaping current practices in the wider industry, whilst at the same time ensuring a reasonable number to feasibly cover in the first Index.

The company scoping process will also take into account the geographic distribution of mining operations with a preference for companies that operate in low-income and lower-middle-income countries, where responsible mining has the greatest potential for contributing significantly to poverty reduction and inclusive economic development.

Some of the world's largest mining companies that operate only in, for instance, high income countries may therefore not be included in the Index.

Company and mine-site scoping is still ongoing and selected companies will be contacted directly by the RMI team.

What company activities will the assessment consider?

The potential range of mined commodities covered by RMI will encompass most minerals and metals. The Index covers the mining activities of the selected companies. The assessment will consider all mining activities of the selected companies, regardless of where those mining activities occur.

The Index will therefore **not cover**:

- Activities of the company which are not related to mining activities;
- Exploration activities (except within the context of Issue Area C: Lifecycle Management);
- Oil and gas extraction and processing;
- Downstream processing, beneficiation and final use of mined metals and minerals.

What is considered to be the scope of responsibility of companies?

RMI recognises that mining company behaviour on EESG issues can be significantly influenced by the extent to which home country and producing country governments create an enabling environment for responsible mining.

RMI therefore will only measure activities over which companies have a degree of control and issues which can reasonably be considered the responsibility of mining companies. In line with the responsibilities of companies to respect human rights as defined in the UN Guiding Principles on Business and Human Rights, this covers any significant issues or impacts which a company can cause or contribute to. As well as areas where companies have a direct responsibility, this also includes issues or impacts where companies may have joint responsibilities or duties alongside other actors, such as host governments, and includes its ability to influence through its business relationships.

The assessment will therefore only focus on those aspects which a company can reasonably be expected to have responsibility for. In the formal methodology report, these responsibilities are further defined in the topic profiles, the glossary of terms, and the indicators.

C.2 Mine site selection and scope

How will RMI assess mine sites?

In addition to ranking companies' corporate-level performance, RMI will to a limited extent assess company performance at a mine-site level. The inclusion of these mine-site indicators will enable RMI to shine a spotlight on how companies are tackling some of the most important issues for local people, local environments, and local economies. These indicators will also serve as points of verification to help demonstrate how companies are applying their policies and practices throughout their operations.

Assessment of mine site indicators will follow the same process as corporate-level indicators, based on an assessment of publicly available information and any additional information provided by companies. Whilst there will not be site-level verification visits by RMI, the mine-site indicators have been designed in a way to be clearly verifiable by any interested parties and aligned with other mine-site focused initiatives, standards, principles and reporting mechanisms.

The RMI report will include reporting at a mine-site indicator level for each of the mine-site indicators. However, mine-site level scoring will not be included in the overall company score.

Which mine sites will the Index cover?

Five mine sites will be selected for each company (approximately 150 mine sites in all) and will apply a select number of indicators at this level (see Appendix 2).

In line with RMI's purpose and goal, the mine sites will be selected from around 85 countries that have been identified based on, among other factors:

- The level of mining within the country: countries with very limited mining are excluded;
- The level of per capita income: countries classified by the World Bank as low-income economies or lower-middle-income economies are included; and
- The level of inequality: countries that do not meet the low per capita income criterion but have high levels of inequality (as measured by the Inequality adjusted Human Development Index) are included.

Mine sites for each company will be selected to provide a representative cross section of each company's operations, and collectively represent a wide geographic distribution. The scoping process to determine the specific mine sites will therefore entail the following considerations:

- Number of countries covered by the set of mine sites;
- Percentage share of company's value of production;
- Range of mined commodities; and
- Range of mine types (e.g. open cast and underground).

It should be noted that the selection of mine sites will, by design, not take into consideration the presence or absence of incidents, controversies or performance issues.

Mine-site scoping is still ongoing and the results will be published in the formal methodology report. Selected companies will be contacted directly by the RMI team.

C.3 Measurement process

How will the indicators be measured?

Each Issue Area is organised into a number of topics that are considered priority areas of focus for RMI. The topics have been identified based on extensive consultations with stakeholders and experts and reflect a general consensus on the most salient issues relating to responsible mining. Company performance on each of these topics is measured through a set of indicators.

Each indicator will be assessed using a series of specific questions – metrics – the evidence-based answers to which will provide the basis for scoring.

To enable a consistent and systematic approach to measurement, RMI uses generic types of metrics to assess performance on indicators. The specific focus of the indicator (reflected in the wording) determines the type of metric used for each indicator. Examples of the different generic metric types are provided below. The generic metric structure is tailored to the specific indicator to ensure that it is incisive, comparable and assessable.

Descriptions and examples of the different metric types are provided below:

- Maturity
- Scope
- Consistency
- Transparency

Maturity

This metric type looks at the depth of maturity of a company's approach, including the extent to which these have been systematically formalised and embedded in wider business processes and strategy, and contributes to continuous improvement. There are three generic structures for the maturity metrics, depending on which of three different measurement areas the indicator is within; commitment, action or effectiveness.

Maturity - Commitment

This metric looks at the level of maturity of a company's commitment to a particular topic area, including looking at the extent to which the commitment has been formally endorsed by senior management, and the extent to which responsibilities and resources have been put in place to support this commitment.

Example:

B.1.1 The company commits to an integrated cross-departmental approach to business ethics.

Can your company demonstrate at the corporate-level that it has:

1. **Formalised its commitment, that is endorsed by senior management**, to adherence to business ethics?
2. **Assigned senior management responsibilities and accountability** for carrying out this commitment?
3. **Committed financial and staffing resources** to implement this commitment?

Maturity - Action

This metric looks at the level of maturity of a company's action relating to a particular topic, including looking at the extent to which a company has systems in place to take action, a planned approach to action, and tracking implementation of these approaches.

Example:

D.4.1 The company has systems in place to ensure its operations conduct and disclose regular assessments of their impacts on community health and safety, and to implement management plans to address these impacts.

Can your company demonstrate at the corporate level that it:

- Has **systems in place** to ensure its operations conduct and disclose regular assessments of their impacts on community health and safety?
- Has systems in place to ensure its **operations develop strategies and plans to address these impacts?**
- **Systematically tracks the implementation** of these strategies and plans?

Maturity - Effectiveness

This metric looks at the extent to which a company is systematically able to demonstrate its commitment and actions are effectively achieving continuous improvements in the potential to fairly and viably benefit economic development, improve the lives of people and/or respect the environments of producing countries.

Example:

E.2.3 The company tracks its performance on occupational health and safety and acts upon the results, demonstrating continuous improvement in ensuring a safe and healthy working environment for all workers.

Can your company demonstrate that it systematically:

- **Tracks, against a baseline and/or target(s), its performance** on occupational health and safety?
- **Audits and/or reviews**, against a baseline and/or target(s), the effectiveness of its measures taken to ensure a safe and healthy working environment for all workers?
- **Acts on the findings of assessments and/or audits** to continuously improve the effectiveness of its measures taken to ensure a safe and healthy working environment for all workers?

Scope

This metric type looks at the scope of coverage of a company's commitment or action.

Example:

D.3.1 The company has systems in place to ensure its operations conduct and disclose regular assessments of their socio-economic impacts, through inclusive participation of affected communities, including women and youth.

Can your company demonstrate at the corporate level that it has systems in place to ensure its operations:

- Systematically pay particular attention to vulnerable and under-represented groups when identifying and assessing the socio-economic impacts of their activities on affected communities?
- Actively involve women in the assessment of socio-economic baseline conditions and impacts?
- Actively involve youth in the assessment of socio-economic baseline conditions and impacts?

Consistency

This metric type looks at how consistently measures are implemented throughout the company.

Example:

B.3.1 The company publicly discloses all contracts, licenses and agreements that grant it access to the extraction of mineral resources and associated projects, and, where necessary, uses its leverage to urge governments to support contract transparency on a level-playing-field basis.

- **Which of your mine sites can demonstrate** that they disclose all their contracts, licenses and agreements that grant them access to the extraction of mineral resources and associated projects.

Transparency

This metric type looks at the level of disclosure provided by a company in relation to its commitments, actions and performance; including the extent to which transparency is in line with open data principles and enables stakeholders to make informed judgements regarding a company's mining activities.

Example:

F.3.1 The company publicly discloses mine-site-level air quality monitoring data, throughout its operations.

Can your company demonstrate that its mine-site-level air quality monitoring data are systematically disclosed:

- In a manner that allows local communities to access and understand them?
- In a machine-readable format?
- In a way that ensures the information remains permanently available?

How will RMI measure effectiveness?

Measuring the effectiveness of companies' actions in addressing EESG issues is a key part of the RMI methodology, as it is through such measurement that one can ensure continuous improvement.

However, measuring the positive impacts of mining companies is challenging from a methodological point of view, particularly in terms of measurability of these impacts and comparability across different types of impacts and in different contexts (e.g. measuring and comparing the impact of procurement interventions).

The Effectiveness indicators within each Issue Area will therefore look at company efforts to:

- track the effectiveness of particular measures they are taking, against target(s) and/or baselines, where appropriate;
- audit or review the effectiveness of these measures; and
- act on the results of assessments and/or audits to improve the effectiveness of these measures.

This enables direct comparability between companies, as well as the highlighting of any leading practice by companies seeking to understand, measure and improve their performance.

Will RMI measure the negative impacts of mining companies?

To the degree that the methodology will consider controversial incidents, they will only be taken into account if they meet the following criteria:

- They involve significant negative impacts, such as egregious human rights abuses;
- There is verifiable evidence of negative EESG outcomes; and
- Impacts are attributable to company activities.

Will companies self-report on their performance?

RMI is not a self-assessment or self-reporting mechanism. Companies will have the opportunity to provide supporting information to supplement publicly available data that will be used in the evidence-based assessment approach. Wherever possible RMI will triangulate information from a variety of non-company sources.

How will RMI consider cases where companies are limited in their ability to act by government restrictions?

RMI recognises that in some cases a mining company may be limited in its ability to meet the expectations of society at large due to restrictions imposed on it by for instance producing country governments, even though this may not be consistent with a company's own commitments in this area. This may apply for example to disclosure of contracts.

The focus of RMI is on areas where society can reasonably expect companies to have responsibility. In certain cases, companies may also have a responsibility to use their leverage to influence those with which they have business relations. The assessment of companies in these areas will therefore be measured by the extent to which they have met the reasonable expectations of society at large.

For example, this approach is shown in the wording for Indicator B.3.1:

The company publicly discloses all contracts, licenses and agreements that grant it access to the extraction of mineral resources and associated projects, and, where necessary, uses its leverage to urge governments to support contract transparency on a level-playing-field basis.

How will the assessment address situations where indicators are not applicable to a company?

In general, RMI indicators have been designed to be relevant for, and applicable to, all large-scale mining companies, in order to ensure fair and comparable scoring of companies. At the same time, a small number of indicators, covering issues considered critical to the focus of RMI, will not be relevant in all contexts. These indicators include for example those relating to indigenous peoples and ASM. In cases where it can be demonstrated that these indicators are not applicable to the company, scoring and weighting will take into account this variability. Companies to which these indicators do not apply will not be disadvantaged in the scoring as a result.

Will RMI recognise certification or similar assurance to meeting other standards or initiatives?

RMI itself is not a standard or certification mechanism. During the process of developing the RMI methodology, there has been detailed consideration of related initiatives, standards, principles and reporting mechanisms. Detailed cross-references are provided in the topic profiles, and efforts have been made to align wording with these where appropriate. Where relevant, certification, assessments or audits which demonstrate performance against these will be considered as supporting information to be considered in the assessment process. In the first Index, direct equivalency with other initiatives, standards, principles and reporting mechanisms will not be recognised but may be considered in the future.

Will the assessment use company confidential information for its assessment?

In order to ensure the transparency and accountability of the Index, as well as the general principle of promoting transparency in demonstrating responsible mining activities, the responses and the written evidence required to accompany any company response can be reasonably expected to be publicly available – i.e. companies will not be required to provide confidential information to answer, or justify their response to, any metric question. RMI recognises that in certain cases companies may have information they consider to be confidential which may nonetheless be useful information for the assessment process. In these cases it will be the consideration of the company whether to share the information and hence place it in the public domain.

How has RMI considered availability of information and the level of effort required to collect information for the assessment?

The RMI methodology has been developed with careful consideration of the potential availability of data and the level of effort required by companies to respond effectively. This has included:

- Focus the indicators and metrics on those areas that society at large can reasonably expect mining companies to collect information on;
- Limit the indicators and metrics to the most incisive areas;
- Align with other initiatives and reporting systems, to minimise effort on the part of companies;
- Pilot test availability of data and effort;
- Collect public-domain data prior to company reporting to reduce effort on the part of companies;
- Develop a user-friendly online system for company responses and information uploads.

What period of time will the assessment cover?

The Index will be produced every two years. Therefore, the assessment will consider relevant information relating to company mining activities within a two-year period. This covers June 2015 to May 2017.

D. Revisions to company-level indicators

Based on the feedback received during the consultation period, as well as testing the indicators and metrics in practice, a number of revisions were made to the company-level indicators. These changes included minor rewording as well as more significant revisions of wording, merging indicators, removing indicators and addition of new indicators. These revisions are outlined in detail, indicator-by-indicator, in Appendix 2.

The indicators were reviewed and revised based on the following guiding criteria which are explained in further detail in this section:

- Coverage
- Incisiveness
- Measurability and assessability
- Comparability
- Consistency and clarity

Coverage

Do the indicators adequately cover the breadth of priority issues which relate to the goal of the Responsible Mining Index?

Several new indicators have been included on important issues, and existing indicators have been strengthened, in order to improve the coverage of the Index as a whole. Some examples of these revisions are outlined below:

Just transition for workers

In recognition of the importance of considering the impacts on workers during major changes in mining operations (e.g. moving from construction to operations phase or downsizing) a new indicator was included (C.1.2) to focus on ensuring just transition for workers during these changes.

Human rights

The human rights topic has been moved up to become the first topic (D.1) within Community Wellbeing in order to emphasise its overarching nature, and the alignment of the general human rights with other topic areas which relate to specific human rights issues (e.g. worker rights, child rights, etc.). Human rights is also consistently listed alongside EESG issues in the indicator wording, in order to keep it clearly visible. Wording of the specific human rights indicators have also been revised in order to more closely align with the UN Guiding Principles on Business and Human Rights.

Quality of relationships with communities

In order to improve the focus on the expected outcomes of stakeholder engagement activities in helping to establish and maintain relationships based on trust, mutual respect and understanding, as well as to reflect leading practices in the industry, a new indicator was included to cover the assessment of the quality of a company's relationships with affected communities (D.2.2).

Children

In recognition of the potential specific and distinct impacts of mining on children, requiring special measures to ensure their rights and perspectives are taken into account, a new specific indicator (D.3.3) has been included to consider this.

Free, prior, informed consent (FPIC)

The wording of indicator D.7.1 has been revised to more clearly recognise the right of indigenous peoples to FPIC. The indicator, its metrics and topic profile have also been revised to reflect the emerging practice of wider application of FPIC to other groups.

Land use

Land use was highlighted in the Draft Methodology as an unresolved issue. On the basis of the additional feedback received, a new indicator (D.8.1) has been included to cover company management of opportunities for shared land use.

Mitigation hierarchy approach

This approach, which prioritises avoidance and minimisation of impacts over their mitigation, is relevant for other indicators, not limited to the one on biodiversity management. This approach has now been incorporated into a number of different impact-related indicators and their metric questions (particularly F.1.1).

Biodiversity and ecosystem services

The indicators within the topic on biodiversity (F.6) have been strengthened and expanded in order to improve the coverage and alignment with other initiatives, and now include a strengthened indicator on the mitigation hierarchy and ecosystem services (F.6.2) and an additional indicator, on companies foregoing mining activities in World Heritage Sites and other protected areas (F.6.1).

Climate change adaptation

In order to improve the coverage of salient issues, and to complement the indicators relating to climate change mitigation, a new indicator (F.7.1) has been included to cover climate change adaptation.

Incisiveness

Do the indicators cover important areas which:

- *can distinguish different levels of performance among companies?*
- *are aligned with and complement related initiatives, standards, principles and reporting mechanisms?*
- *enable the tracking of improvements from one Index to the next?*

In some cases, indicators have been removed as they were considered to be relatively less incisive compared to other indicators (these include indicators A.3.1, B.5.2, B.7.2, D.2.3, D.2.4, E.2.3, F.9.1 in the Draft Methodology).

In some cases, two indicators have been merged to improve the incisiveness. For example, two previous indicators relating to tailings management (F.2.1 and F.2.2 in Draft Methodology) have been integrated into a single indicator (F.2.1) to improve the incisiveness.

In some cases, new indicators have been included to improve the incisiveness. For example, new effectiveness indicator on bribery and corruption (B.8.2) has been included to cover this incisive issue in addition to the commitment indicator for this topic (B.8.1). A new effectiveness indicator was included on procurement (A.2.2) to focus on company efforts to track and improve the effectiveness of its procurement measures, as current initiatives highlighted that this was an important and incisive area to focus on, as well as the existing action indicator (A.2.1). Improvements in incisiveness has also been a key criterion for including several other new effectiveness indicators (e.g. D.2.2, D.3.4 and F.4.2).

In many cases, improved incisiveness has been a reason for revisions and rewording to indicators, often alongside other reasons such as improved coverage or clarity.

In order to reduce overlap, three indicators in the Draft Methodology (D.11.2 on community grievance mechanisms, E.4.1 on workers' grievance mechanisms, and F.4.2 on water quality monitoring) have been removed from the company-level indicators and will only be assessed at the mine site level.

Measurability and assessability

Can the indicator be:

- *assessed based on information that can be reasonably expected to be available?*
- *addressed with a reasonable amount of effort in reporting and analysing data?*
- *readily measured and assessed based on the information which can be expected to be available?*

Several indicators have been slightly reworded in order to improve their measurability and assessability. For example, A.3.2 from the Draft Methodology has been made more specific and D.6.1 and D.8.2 have been merged with other indicators to improve assessability. For all indicators, metrics have been developed to be fully measurable and assessable.

Comparability

Does the indicator enable a fair comparison of policies and practices across different companies and different contexts?

The indicators and metric questions have been designed and tested to ensure comparability across companies and companies to the greatest extent possible. Wording revisions have been made to some indicators to improve comparability as well as clarity and incisiveness. For example, B.3.1 has been reworded specifically to improve

comparability across companies and different operating contexts, and a few indicators (e.g. A.3.1 and D.3.2 in the Draft Methodology) have been removed in part due to challenges with comparability.

Consistency and clarity

Is the wording of the indicator:

- *consistent and aligned with wording of other indicators?*
- *consistent with the measurement area of the indicator?*
- *consistent with the topic profiles and glossary?*
- *clearly understandable in its intent and scope, including scope of company responsibility?*
- *unlikely to be misinterpreted?*

The specific wording of many of the indicators has been slightly revised to ensure consistency of wording throughout the indicators. Wording has also been revised to improve consistency with wording used in the topic profiles and glossary.

Consistent phrases are also used throughout which are connected to the measurement area of the indicator, as well as linking to the metric types. For example: “The company commits to ...” is used in commitment indicators; “The company has systems in place “ in action indicators; and “The company tracks its performance on ... and acts upon the results, demonstrating continuous improvement in” in effectiveness indicators.

Revisions have also been made to the specific wording of indicators in order to improve the clarity. In several cases this is to clarify the intended scope of the indicator and the scope of company responsibility. For example, the wording of D.10.2 has been revised to improve the clarity of focus on impacts on workers and communities from operations in conflict-affected and high-risk areas and the phrase ‘security of workers and communities’ has been removed to avoid confusion with private security forces (which is the focus of D.10.1).

E. Revisions to mine site indicators

It is recognised that the selection of a reasonably focused set of indicators for application at mine site level is a challenge, given the number of indicators that could potentially be applied at this operational level, the extensive list of issues that the consultation process highlighted as important to measure at individual mine level, and the practical limitations of assessing at mine-site level.

Feedback from the consultations has helped improve identification of the most incisive indicators to assess at mine-site level, as well as improving the focus of assessment.

The revised mine site indicators are included in Appendix 3.

Three new topics have been included as mine-site indicators. In some cases, indicators which were previously company-level indicators have been revised to be covered in mine site indicators. These new mine-site level topics include:

- Local procurement;
- Workers grievance mechanisms;
- Biodiversity management.

The scope of the indicator on water has been expanded to cover management of water quantity as well as water quality.

Two indicators (assessment of impacts and emergency preparedness) have been removed as mine site indicators as they were considered less incisive. However these topics are still covered by company-level indicators.

The wording of the mine site indicators has also been revised to be more consistent with each other as well as consistent with similar phrasing used in the company-level indicators.

Appendix 1. Final set of RMI indicators

Issue Areas
Topics
Indicators

Codes	Topics and indicators
A. Economic Development	
A.1	National and Regional Socio-Economic Development Planning
A.1.1	The company commits to take account of national and wider regional socio-economic development plans in making its mining-related investment and business decisions in producing countries, with the aim of enhancing socio-economic development.
A.2	Procurement
A.2.1	The company has systems in place to develop procurement opportunities for suppliers at national and wider regional levels.
A.2.2	The company tracks its performance on national and wider regional procurement and acts upon the results, demonstrating continuous improvement in developing procurement opportunities at the national and wider regional levels.
A.3	Capacity building
A.3.1	The company has systems in place to support in-country capacity building through Research & Development aimed at addressing socio-economic and environmental issues related to mining within producing countries.
A.4	Enhancing the National Skills Base
A.4.1	The company has systems in place to ensure its operations support skills development and skills transfer, especially at technical, and mid and upper management level, in producing countries.
B. Business Conduct	
B.1	Business Ethics
B.1.1	The company commits to an integrated cross-departmental approach to business ethics.
B.1.2	The company has effective whistleblowing mechanisms in place, throughout its operations, for reporting concerns about unethical behaviour.

B.2	Board and Senior Management Accountability and Diversity
B.2.1	The company has systems in place to hold individual board directors and senior managers accountable for responsible business conduct on economic, environmental, social, governance and human rights issues.
B.2.2	The company actively supports diversity and inclusivity of persons and perspectives on its board and in its senior management.
B.3	Contracts Disclosure
B.3.1	The company publicly discloses all contracts, licenses and agreements that grant it access to the extraction of mineral resources and associated projects, and, where necessary, uses its leverage to urge governments to support contract transparency on a level-playing-field basis.
B.4	Tax Transparency
B.4.1	The company practices tax transparency in all its tax jurisdictions.
B.5	Beneficial Ownership
B.5.1	The company publicly discloses the beneficial ownership of each of its wholly or partly-owned entities that bids for, operates or invests in extracting mineral resources.
B.6	Payments to Producing Countries
B.6.1	The company publicly discloses all payments it makes to sub-national and national governments, providing disaggregated data on a project-level basis.
B.7	Lobbying Practices and Policy Engagement
B.7.1	The company publicly discloses its lobbying practices and positions.
B.7.2	The company commits to engage constructively in multi-stakeholder forums to improve the transparency of mineral revenues, including their management, distribution and spending.
B.8	Bribery and Corruption
B.8.1	The company commits to prevent all direct and indirect forms of bribery and corruption.
B.8.2	The company tracks its performance on anti-bribery and corruption and acts upon the results, demonstrating continuous improvement in preventing all direct and indirect forms of bribery and corruption.
B.9	Responsible Contracting and Sourcing
B.9.1	The company has systems in place to carry out regular due diligence on the practices of contractors, sub-contractors and suppliers to identify and assess any environmental, social, governance and human rights risks.

C. Lifecycle management	
C.1	Mine Lifecycle Management
C.1.1	The company commits to adopt a lifecycle approach throughout its project development and operational phases.
C.1.2	The company tracks its performance on managing socio-economic impacts on workers of all major changes in its operations (e.g. moving from construction to operations phase or downsizing) and acts upon the results, demonstrating continuous improvement in ensuring just transition for workers.
C.2	Project Approval Process
C.2.1	The company has systems in place to integrate environmental, social, governance and human rights factors into the stage-gating process at investment committee level.
C.3	C.3 Post-Closure Viability for Communities and Workers
C.3.1	The company has systems in place to plan for appropriate land rehabilitation and post-mining land-use opportunities.
C.3.2	The company designs and plans operations to manage post-closure transition for affected communities, to ensure continued viability of their livelihoods.
C.3.3	The company designs and plans operations to manage post-closure transition for workers, to ensure continued viability of their livelihoods, both around the mine and in any labour sending areas.
C.3.4	The company provides financial surety for mine closure and post-closure liabilities and publicly discloses financial surety arrangements, throughout its operations.
C.4	Mergers, Acquisition and Disposal Due Diligence
C.4.1	The company has systems in place to carry out due diligence on mergers, acquisitions and disposals, to identify and assess potential economic, environmental, social, governance and human rights risks related to previous, current and future development.
D. Community Wellbeing	
D.1	Human Rights
D.1.1	The company commits to respect human rights, in line with the UN Guiding Principles on Business and Human Rights, with the aim of contributing to workers' and communities' wellbeing.
D.1.2	The company has systems in place, in line with the UN Guiding Principles on Business and Human Rights, to carry out regular due diligence to identify and assess any salient impacts of its activities on human rights, and to design and implement strategies and plans to prevent, mitigate, and account for how it addresses identified impacts, contributing to workers' and communities' wellbeing.
D.1.3	The company publicly reports on its human rights management and performance, in line with the UN Guiding Principles on Business and Human Rights.
D.1.4	The company commits to respect the rights and protections accorded to human rights defenders in its areas of operations.

D.2	Community and Stakeholder Engagement
D.2.1	The company has systems in place to ensure its operations support and facilitate ongoing and inclusive engagement of affected communities, including women and youth, with mechanisms for community members to raise any issues of concern and participate in discussions and decision-making on matters that may impact them.
D.2.2	The company tracks the quality of its relationships with affected communities and acts upon the results, demonstrating continuous improvement in establishing and maintaining relationships based on trust, mutual respect and understanding.
D.3	Economic and Social Viability
D.3.1	The company has systems in place to ensure its operations conduct and disclose regular assessments of their socio-economic impacts, through inclusive participation of affected communities, including women and youth.
D.3.2	The company has systems in place to ensure its operations encourage local entrepreneurship, support local business development and develop local procurement opportunities, including for women and youth.
D.3.3	The company has systems in place to ensure its operations conduct and disclose regular assessments of their impacts of its activities on children, including those that are unlikely to be well represented through formal structures.
D.3.4	The company tracks its performance on managing socio-economic impacts and acts upon the results, demonstrating continuous improvement in contributing to social and economic viability in communities where it operates.
D.4	Community Health
D.4.1	The company has systems in place to ensure its operations conduct and disclose regular assessments of their impacts on community health and safety, and to implement management plans to address these impacts.
D.5	Gender Equity
D.5.1	The company tracks its performance on managing any impacts of its activities on women, and acts upon the results, demonstrating continuous improvement in avoiding, minimising and mitigating these impacts, while contributing to women's empowerment.
D.6	Indigenous Peoples
D.6.1	Where applicable, the company has systems in place to ensure its operations identify, through inclusive participation, the rights, interests, needs and perspectives of all indigenous peoples groups potentially affected by current and planned mines and associated facilities, and to design and implement strategies and plans to respect identified rights, interests, needs and perspectives.
D.6.2	Where applicable, the company tracks its performance on respecting the rights, interests, aspirations, culture and natural resource-based livelihoods of all indigenous peoples groups potentially affected by current and planned mines and associated facilities, demonstrating continuous improvement in avoiding adverse impacts and ensuring sustainable benefits and opportunities for these groups.

D.7	Free, Prior and Informed Consent
D.7.1	The company commits to respect the right of indigenous peoples to Free, Prior and Informed Consent (FPIC), and to support the extension of the principle of FPIC to other project-affected groups.
D.8	Land Use and Resettlement
D.8.1	The company has systems in place to ensure its operations identify and assess potential opportunities for shared land use, and to design and implement strategies and plans to optimise these opportunities, while avoiding, minimising and mitigating any adverse impacts.
D.8.2	The company has systems in place to ensure its operations identify and assess the potential impacts of the physical and/or economic displacement of project-affected people, and to design and implement strategies and plans to avoid, minimise and mitigate identified impacts, through inclusive participation, including by women and youth.
D.8.3	The company tracks its performance on resettlement and acts upon the results, demonstrating continuous improvement in ensuring that livelihoods, livelihood security and living standards have been improved or restored.
D.9	Artisanal and Small-Scale Mining
D.9.1	Where applicable, the company has systems in place to ensure its operations facilitate ongoing and proactive engagement with artisanal and small-scale mining (ASM) communities and operations in and around its operations.
D.9.2	Where applicable, the company has systems in place to ensure its operations support technical assistance programmes and/or alternative livelihood programmes for ASM miners.
D.10	Security and Conflict-affected Areas
D.10.1	The company tracks its performance on addressing potential human rights abuses related to its security management and acts upon the results, demonstrating continuous improvement in preventing and minimising these risks, in line with the Voluntary Principles on Security and Human Rights.
D.10.2	The company has systems in place to ensure its operations carry out regular due diligence to identify and assess risks for workers and communities associated with their presence in any conflict-affected and high-risk areas, and to design and implement strategies to address identified risks.
D.11	Grievance and Remedy
D.11.1	The company tracks the performance of its grievance mechanisms for communities and acts upon the results, demonstrating continuous improvement in effectively addressing claimants' concerns through appropriate remedy.
E. Working Conditions	
E.1	Living Wage
E.1.1	The company tracks its performance on wages and acts upon the results, demonstrating continuous improvement in meeting or exceeding verified living wage standards, or legal minimum wage, whichever is the highest.

E.2	Occupational Health and Safety
E.2.1	The company commits to ensure safe and healthy working conditions.
E.2.2	The company has systems in place to ensure its operations address the specific health and safety needs of women workers.
E.2.3	The company tracks its performance on occupational health and safety and acts upon the results, demonstrating continuous improvement in ensuring a safe and healthy working environment for all workers.
E.3	Rights to Organise, Collective Bargaining and Freedom of Association
E.3.1	The company has systems in place to ensure its operations actively respect the rights of workers to organise, collective bargaining and freedom of association.
E.4	Worker Recourse
E.4.1	The company tracks the performance of its grievance mechanisms for workers and acts upon the results, demonstrating continuous improvement in effectively addressing claimants' concerns, through appropriate remedy.
E.5	Non-Discrimination and Equal Opportunity
E.5.1	The company has systems in place to ensure its operations base their employment relationships on the principle of equal opportunity, actively preventing all forms of discrimination in the workplace and promoting workforce diversity.
E.6	Elimination of Forced Labour and Child Labour
E.6.1	The company has systems in place to carry out regular due diligence to identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and its supply chains, and to design and implement strategies to address identified risks.
F. Environmental Responsibility	
F.1	Environmental Stewardship
F.1.1	The company commits to manage its environmental impacts systematically, through the mitigation hierarchy approach.
F.1.2	The company has systems in place to ensure its operations conduct regular assessments of its environmental impacts through an integrated approach, and to disclose them.
F.1.3	The company tracks its performance on managing its environmental impacts and acts upon the results, demonstrating continuous improvement in avoiding, minimising, mitigating and offsetting these impacts.
F.2	Tailings Management
F.2.1	Where applicable, the company tracks its performance on addressing potential risks related to its tailings facilities, including seepage and tailings dam failure, and acts upon the results, demonstrating continuous improvement in avoiding, minimising and mitigating these risks.

F.3	Air
F.3.1	The company publicly discloses mine-site level air quality monitoring data, throughout its operations.
F.4	Water
F.4.1	The company has systems in place to ensure its operations identify and assess their impacts on water quality and quantity in the catchments or regional basins they operate in, and to design and implement water stewardship strategies and plans to respect the water needs and rights of the affected area, including the environment, communities, farmers, and other water-dependent industries.
F.4.2	The company tracks its performance on water management, both for quality and quantity, and acts upon the results, demonstrating continuous improvement in reducing its water consumption and its adverse impacts on water quality, to improve water security for other stakeholders in the catchments or regional basins it operates in.
F.5	Noise and Vibration
F.5.1	The company has systems in place to ensure its operations limit the impacts of noise and vibration on affected communities, structures, properties, and wildlife.
F.6	Biodiversity and Ecosystem Services
F.6.1	The company commits to not explore or mine in World Heritage Sites and to respect other terrestrial and marine protected areas that are designated to conserve cultural or natural heritage.
F.6.2	The company tracks its performance on biodiversity and ecosystem services management and acts upon the results, demonstrating continuous improvement in avoiding, minimising, mitigating and offsetting its impacts.
F.7	Climate Change and Energy Efficiency
F.7.1	The company has systems in place to identify and assess the potential implications of climate change on its operations and its impacts on communities, workers and the environment, and to design and implement appropriate adaptation strategies.
F.7.2	The company tracks its performance on managing the greenhouse gases (GHG) emissions generated by its activities and acts upon the results, demonstrating continuous improvement in minimising them.
F.7.3	The company tracks its performance on managing energy consumption throughout its operations and acts upon the results, demonstrating continuous improvement in energy efficiency.
F.8	Hazardous Materials Management
F.8.1	The company has systems in place to ensure its operations identify and assess potential risks related to the transportation, handling, storage, emission and disposal of hazardous materials, and to design and implement strategies and plans to address identified risks.

F.9	Emergency Preparedness
F.9.1	The company has systems in place to ensure its operations engage local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans.
F.9.2	The company publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, throughout its operations.

Appendix 2. Main revisions to RMI company-level indicators

Original Topics and Indicators*		Key revisions*	Revised Topics and Indicators	
A. Economic Development				
A.1	Subnational, National and Regional Socio-Economic Development Planning	Topic title reworded to clarify geographic scope.	A.1	National and Regional Socio-Economic Development Planning
A.1.1.	The company considers how its mining-related investments and business decisions (including those related to infrastructure, accommodation and influx management) contribute to subnational, national and regional socio-economic development, and aligns these with government planning processes.	Reworded to clarify intent and geographic scope.	A.1.1	The company commits to take account of national and wider regional socio-economic development plans in making its mining-related investment and business decisions in producing countries, with the aim of enhancing socio-economic development.
A.2	A.2 Procurement		A.2	Procurement
A.2.1	The company has measures in place to ensure equitable access to procurement opportunities at subnational, national and regional levels.	Reworded to strengthen intent and clarify geographic scope.	A.2.1	The company has systems in place to develop procurement opportunities for suppliers at national and wider regional levels.
		A new indicator included to improve incisiveness to look at company efforts to track and improve the effectiveness of its procurement measures.	A.2.2	The company tracks its performance on national and wider regional procurement and acts upon the results, demonstrating continuous improvement in developing procurement opportunities at the national and wider regional levels.
A.3	A.3 Institutional Capacity Building		A.3	Capacity building
A.3.1	The company supports institutional capacity building, at subnational, national and regional levels.	Removed as considered less incisive and challenging to assess.		
A.3.2	The company supports capacity building on socio-economic research and development at subnational, national and regional levels.	Reworded to clarify geographic scope and focus on mining-related R&D and the scope of the R&D expanded to include environmental as well as socio-economic issues.	A.3.1	The company has systems in place to support in-country capacity building through Research & Development aimed at addressing socio-economic and environmental issues related to mining within producing countries.
A.4	Enhancing the Skills Base	Topic title reworded to clarify geographic scope.	A.4	Enhancing the National Skills Base
A.4.1	The company has systems in place to support skills development and skills transfer, especially at technical, and mid and upper management level, in producing countries.		A.4.1	The company has systems in place to ensure its operations support skills development and skills transfer, especially at technical, and mid and upper management level, in producing countries.

B. Business Conduct				
B.1	Business Ethics		B.1	Business Ethics
B.1.1	The company promotes cross-departmental adherence to business ethics.		B.1.1	The company commits to an integrated cross-departmental approach to business ethics.
B.1.2	The company has a whistle-blowing mechanism in place for reporting concerns about unethical behaviour.		B.1.2	The company has effective whistleblowing mechanisms in place, throughout its operations, for reporting concerns about unethical behaviour.
B.2	Board Level and Senior Management Accountability		B.2	Board Level and Senior Management Accountability
B.2.1	The company holds individual board directors and senior managers accountable for responsible business conduct and environmental and social performance.	Reworded to ensure consistency of wording with other indicators	B.2.1	The company has systems in place to hold individual board directors and senior managers accountable for responsible business conduct on economic, environmental, social, governance and human rights issues.
B.2.2	The company demonstrates respect for diversity and inclusivity by including a range of gender, expertise and stakeholder interests on its board and in its senior management.	Strengthened to improve incisiveness; looking for companies actively supporting (rather than only respecting) diversity and inclusivity.	B.2.2	The company actively supports diversity and inclusivity of persons and perspectives on its board and in its senior management.
B.3	Contracts Disclosure		B.3	Contracts Disclosure
B.3.1	The company publicly discloses all contracts, licences and agreements that grant it access to the extraction of mineral resources and associated projects.	Revised to improve comparability and incisiveness, to take account of situations where contract disclosure may be prohibited by law.	B.3.1	The company publicly discloses all contracts, licenses and agreements that grant it access to the extraction of mineral resources and associated projects, and, where necessary, uses its leverage to urge governments to support contract transparency on a level-playing-field basis.
B.4	Beneficial Ownership	Beneficial Ownership topic renumbered to B.5.	B.5	Beneficial Ownership
B.4.1	The company publicly discloses the beneficial ownership of each entity within the company that bids for, operates or invests in extracting mineral resources.	B.4.1 renumbered to B.5.1. Wording revised to improve clarity of scope.	B.5.1	The company publicly discloses the beneficial ownership of each of its wholly or partly-owned entities that bids for, operates or invests in extracting mineral resources.
B.5	Tax Transparency	Tax Transparency topic renumbered to B.4	B.4	Tax Transparency
B.5.1	The company practices tax transparency in all its tax jurisdictions.	B.5.1 renumbered to B.4.1	B.4.1	The company practices tax transparency in all its tax jurisdictions.
B.5.2	The company publicly discloses all tax benefits and tax holidays it receives from local and national governments.	Removed to improve incisiveness, as disclosure of tax holidays and tax benefits are included within the scope of B.5.1.		
B.6	Payments to Producing Countries		B.6	Payments to Producing Countries
B.6.1	The company publicly discloses all the payments that it makes to subnational and national governments, providing disaggregated data on a project-level basis.		B.6.1	The company publicly discloses all payments it makes to sub-national and national governments, providing disaggregated data on a project-level basis.

B.7	Lobbying Practices and Political Contributions	Topic title changed to reflect the new focus of this topic.	B.7	Lobbying Practices and Policy Engagement
B.7.1	The company publicly discloses its lobbying practices and positions.		B.7.1	The company publicly discloses its lobbying practices and positions.
B.7.2	The company publicly discloses its direct and indirect political contributions.	Removed as considered less incisive relative to other indicators.		
		New indicator to cover the importance of company engagement in multi-stakeholder forums	B.7.2	The company commits to engage constructively in multi-stakeholder forums to improve the transparency of mineral revenues, including their management, distribution and spending.
B.8	Bribery and Corruption		B.8	Bribery and Corruption
B.8.1	The company demonstrates commitment to prevent all direct and indirect forms of bribery and corruption, and it has systems in place to achieve this objective.	Revised to improve focus, clarity and consistency	B.8.1	The company commits to prevent all direct and indirect forms of bribery and corruption.
		New effectiveness indicator to cover incisive issue in addition to company commitment (B.8.1)	B.8.2	The company tracks its performance on anti-bribery and corruption and acts upon the results, demonstrating continuous improvement in preventing all direct and indirect forms of bribery and corruption.
B.9	Responsible Contracting and Sourcing		B.9	Responsible Contracting and Sourcing
B.9.1	The company incorporates requirements for responsible environmental, social, human rights and governance practices into formal agreements with contractors, subcontractors, suppliers and business partners, and has systems in place to ensure adherence.	Reworded to improve clarity of intent and scope, and consistency of wording	B.9.1	The company has systems in place to carry out regular due diligence on the practices of contractors, sub-contractors and suppliers to identify and assess any environmental, social, governance and human rights risks.
C. Lifecycle management				
C.1	Mine Lifecycle Management		C.1	Mine Lifecycle Management
C.1.1	The company commits to adopt a lifecycle approach that integrates mine closure throughout project development and operations.	Revised wording to improve clarity of scope to explicitly mention closure	C.1.1	The company commits to adopt a lifecycle approach throughout its project development and operational phases.
		<i>NB: C.1.2 moved to C.3.3</i>		
		New indicator to improve coverage to include just transition for workers during major changes.	C.1.2	The company tracks its performance on managing socio-economic impacts on workers of all major changes in its operations (e.g. moving from construction to operations phase or downsizing) and acts upon the results, demonstrating continuous improvement in ensuring just transition for workers.
C.2	Project Approval Process		C.2	Project Approval Process
C.2.1	The company integrates economic, environmental, social and governance factors into the stage-gating process at investment committee level.	Reworded to improve consistency.	C.2.1	The company has systems in place to integrate environmental, social, governance and human rights factors into the stage-gating process at investment committee level.

C.3	Post-Closure Community Viability	Topic title changed to clarify scope	C.3	C.3 Post-Closure Viability for Communities and Workers
C.3.1	The company plans for land rehabilitation and post-mining land-use opportunities.	Reworded to improve consistency	C.3.1	The company has systems in place to plan for appropriate land rehabilitation and post-mining land-use opportunities.
C.3.2	The company designs and plans operations to ensure the transition and continued viability of livelihoods and company-funded shared infrastructure, both around the mine and in labour sending areas, where applicable.	Split into two indicators to improve incisiveness, one focussed on communities, and one on workers.	C.3.2	The company designs and plans operations to manage post-closure transition for affected communities, to ensure continued viability of their livelihoods.
			C.3.3	The company designs and plans operations to manage post-closure transition for workers, to ensure continued viability of their livelihoods, both around the mine and in any labour sending areas.
C.1.2	The company provides financial surety for mine closure and post-closure liabilities. It publicly discloses corresponding arrangements, ensuring that these arrangements are perpetually accessible to communities.	Moved to Topic C.3 to improve alignment between topics. Reworded to improve consistency.	C.3.3	The company provides financial surety for mine closure and post-closure liabilities and publicly discloses financial surety arrangements, throughout its operations.
C.4	Mergers, Acquisition and Disposal Due Diligence		C.4	Mergers, Acquisition and Disposal Due Diligence
C.4.1	The company performs due diligence on mergers, acquisitions and disposals, evaluating both historical and future development, to ensure environmentally and socially responsible conduct.	Reworded to improve consistency and clarity of scope.	C.4.1	The company has systems in place to carry out due diligence on mergers, acquisitions and disposals, to identify and assess potential economic, environmental, social, governance and human rights risks related to previous, current and future development.
D. Community Wellbeing**				
D.9	Human Rights		D.1	Human Rights
D.9.1	The company seeks to enhance community wellbeing and to respect human rights, for example through alignment with the UN Guiding Principles on Business and Human Rights.	Reworded to improve clarity of scope.	D.1.1	The company commits to respect human rights, in line with the UN Guiding Principles on Business and Human Rights, with the aim of contributing to workers' and communities' wellbeing.
		New indicator on human rights impact identification and assessment to improve coverage and alignment.	D.1.2	The company has systems in place, in line with the UN Guiding Principles on Business and Human Rights, to carry out regular due diligence to identify and assess any salient impacts of its activities on human rights, and to design and implement strategies and plans to prevent, mitigate, and account for how it addresses identified impacts, contributing to workers' and communities' wellbeing.
D.9.2	The company publicly reports on human rights management and performance, in line with the UN Guiding Principles on Business and Human Rights.	Renumbered, no other changes.	D.1.3	The company publicly reports on its human rights management and performance, in line with the UN Guiding Principles on Business and Human Rights.
D.9.3	The company records and publicly reports, including to appropriate producing country government authorities, any credible incidents of human rights violations and any identified risks for human rights defenders in its areas of operation	Reworded and changed to a commitment indicator to improve incisiveness and clarity of scope.	D.1.4	The company commits to respect the rights and protections accorded to human rights defenders in its areas of operations.

D.1	Community and Stakeholder Engagement	Renumbered	D.2	Community and Stakeholder Engagement
D.1.1	The company has management systems in place to facilitate ongoing and inclusive stakeholder engagement activities and to enable participation of affected communities and rights holders, including women and youth.	Revised to improve incisiveness and clarity of scope	D.2.1	The company has systems in place to ensure its operations support and facilitate ongoing and inclusive engagement of affected communities, including women and youth, with mechanisms for community members to raise any issues of concern and participate in discussions and decision-making on matters that may impact them.
		New indicator to improve coverage and incisiveness to look at company efforts to track and improve the quality of its relationships with local communities.	D.2.2	The company tracks the quality of its relationships with affected communities and acts upon the results, demonstrating continuous improvement in establishing and maintaining relationships based on trust, mutual respect and understanding.
D.2	Economic and Social Viability		D.3	Economic and Social Viability
D.2.1	The company conducts regular and ongoing social impact assessments to identify baseline conditions and changes, assess positive and negative impacts and identify measures to manage these impacts.	Wording revised to clarify intent.	D.3.1	The company has systems in place to ensure its operations conduct and disclose regular assessments of their socio-economic impacts, through inclusive participation of affected communities, including women and youth.
D.2.2	The company has measures in place to support local business development, and encourages entrepreneurship, particularly for women and youth.	Scope expanded to include measures to support local procurement opportunities.	D.3.2	The company has systems in place to ensure its operations encourage local entrepreneurship, support local business development and develop local procurement opportunities, including for women and youth.
D.2.3	The company facilitates the participation of women and youth in the design, implementation, monitoring, evaluation, and reporting of measures to manage social impacts, including community development projects.	Removed as overlap with coverage of other indicators and considered less incisive		
D.2.4	The company publicly discloses its local development agreements and benefit sharing agreements.	Removed as considered less incisive		
		New indicator to improve coverage of impacts on children	D.3.3	The company has systems in place to ensure its operations conduct and disclose regular assessments of their impacts of its activities on children, including those that are unlikely to be well represented through formal structures.
		New effectiveness indicator to improve coverage and incisiveness within the topic area	D.3.4	The company tracks its performance on managing socio-economic impacts and acts upon the results, demonstrating continuous improvement in contributing to social and economic viability in communities where it operates.
D.3	Community health		D.4	Community health
D.3.1	The company has systems in place to implement and document integrated community health and safety assessments and management plans.		D.4.1	The company has systems in place to ensure its operations conduct and disclose regular assessments of their impacts on community health and safety, and to implement management plans to address these impacts.

D.3.2	The company develops and implements policies, business practices and targeted initiatives to mitigate the impact of high-burden diseases such as HIV, Tuberculosis, Malaria and others that are applicable in the context of its operations.	Removed; while in line with current and emerging practice, problematic in terms of comparability across companies and assessability.		
D.4	Gender Equity		D.5	Gender Equity
D.4.1	The company acts on the results of regular assessments of the impacts of its activities on women.	Revised to improve coverage, incisiveness and clarity	D.5.1	The company tracks its performance on managing any impacts of its activities on women, and acts upon the results, demonstrating continuous improvement in avoiding, minimising and mitigating these impacts, while contributing to women's empowerment.
D.5	Indigenous Peoples		D.6	Indigenous Peoples
D.5.1	The company identifies all indigenous peoples' groups located near current and potential mines and associated facilities, including those in potential areas to be affected by the mining operation (e.g. mine tailings dams). It identifies their particular rights, interests and needs through inclusive meaningful participation.	D.5.2 integrated within D.5.1. to reduce overlap and improve assessability. Reworded to improve consistency and clarity.	D.6.1	Where applicable, the company has systems in place to ensure its operations identify, through inclusive participation, the rights, interests, needs and perspectives of all indigenous peoples groups potentially affected by current and planned mines and associated facilities, and to design and implement strategies and plans to respect identified rights, interests, needs and perspectives.
D.5.2	The company implements a plan to address the particular rights, interests and needs of indigenous peoples' groups through inclusive meaningful participation.			
		New indicator to improve coverage and incisiveness, looking at companies' efforts to track and improve performance on this issue	D.6.2	Where applicable, the company tracks its performance on respecting the rights, interests, aspirations, culture and natural resource-based livelihoods of all indigenous peoples groups potentially affected by current and planned mines and associated facilities, demonstrating continuous improvement in avoiding adverse impacts and ensuring sustainable benefits and opportunities for these groups.
D.6	Free, Prior and Informed Consent		D.7	Free, Prior and Informed Consent
D.6.1	The company supports the principle of free prior and informed consent (FPIC) through its policies and implementation guidelines.	Revised to improve clarity, coverage and incisiveness	D.7.1	The company commits to respect the right of indigenous peoples to Free, Prior and Informed Consent (FPIC), and to support the extension of the principle of FPIC to other project-affected groups.
D.7	Land Rights, Resettlement and Remedy	Topic title changed to reflect revised focus.	D.8	Land Use and Resettlement
		New indicator on shared land use to improve coverage	D.8.1	The company has systems in place to ensure its operations identify and assess potential opportunities for shared land use, and to design and implement strategies and plans to optimise these opportunities, while avoiding, minimising and mitigating any adverse impacts.
D.7.1	The company has management systems in place, including assessment and planning, for avoiding, minimising and addressing the impacts of the physical and/or economic displacement of project-affected people.	D.7.2 integrated into D.7.1. and wording revised to improve clarity of scope and assessability	D.8.2	The company has systems in place to ensure its operations identify and assess the potential impacts of the physical and/or economic displacement of project-affected people, and to design and implement strategies and plans to avoid, minimise and

D.7.2	The company engages project-affected people, including women and youth, in land rights and resettlement decision-making and implementation, and evaluates the extent to which livelihoods, livelihood security and living standards have been improved or restored.			mitigate identified impacts, through inclusive participation, including by women and youth.
		New effectiveness indicator to improve incisiveness	D.8.3	The company tracks its performance on resettlement and acts upon the results, demonstrating continuous improvement in ensuring that livelihoods, livelihood security and living standards have been improved or restored.
D.8	Artisanal and Small-Scale Mining		D.9	Artisanal and Small-Scale Mining
D.8.1	Where applicable, the company establishes formal engagement agreements with artisanal and small-scale mining (ASM) communities and operations in and around mines to regulate the relationship between itself and ASM.	Revised to improve clarity, coverage and assessability; covering wider engagement beyond formal agreements	D.9.1	Where applicable, the company has systems in place to ensure its operations facilitate ongoing and proactive engagement with artisanal and small-scale mining (ASM) communities and activities in and around their operations.
D.8.2	Where applicable, the company assesses and enables technical assistance programmes and/or alternate livelihood opportunities for ASM miners to encourage economic viability.		D.9.2	Where applicable, the company has systems in place to ensure its operations support technical assistance programmes and/or alternative livelihood programmes for ASM miners.
D.10	Security	Topic title changed to clarify scope.	D.10	Security and Conflict-affected Areas
D.10.1	The company takes measures to minimise the risk of human rights abuses linked to its security management, in line with the Voluntary Principles on Security and Human Rights.	Revised to improve incisiveness to look at companies' efforts to track and improve performance on this issue.	D.10.1	The company tracks its performance on addressing potential human rights abuses related to its security management and acts upon the results, demonstrating continuous improvement in preventing and minimising these risks, in line with the Voluntary Principles on Security and Human Rights.
D.10.2	When operating in conflict-affected and high-risk areas, the company has specific systems in place for managing security risks for workers and communities.	Reworded to improve clarity of scope	D.10.2	The company has systems in place to ensure its operations carry out regular due diligence to identify and assess risks for workers and communities associated with their presence in any conflict-affected and high-risk areas, and to design and implement strategies to address identified risks.
D.11	Grievance and Remedy		D.11	Grievance and Remedy
D.11.1	The company has formal community grievance mechanisms in place for affected stakeholders to raise concerns in an easily accessible manner and have them addressed.	Revised to improve incisiveness to focus on tracking performance	D.11.1	The company tracks the performance of its grievance mechanisms for communities and acts upon the results, demonstrating continuous improvement in effectively addressing claimants' concerns through appropriate remedy.
D.11.2	The company monitors and publicly reports on the effectiveness of the operational-level grievance and remedy mechanisms.	Revised to a mine-site indicator		
E. Working Conditions				
E.1	Living Wage		E.1	Living Wage
E.1.1	The company pays wages that meet or exceed verified living wage standards.	Revised to improve incisiveness and clarity; to look at companies' efforts to track and improve their performance on this issue.	E.1.1	The company tracks its performance on wages and acts upon the results, demonstrating continuous improvement in meeting or exceeding verified living wage standards, or legal minimum wage, whichever is the highest.

E.2	Occupational Health and Safety		E.2	Occupational Health and Safety
E.2.1	The company commits to promote safe and healthy working conditions.	Reworded to improve consistency	E.2.1	The company commits to ensure safe and healthy working conditions.
E.2.4	The company provides for health and safety measures specific to women workers.	Reworded to improve consistency.	E.2.2	The company has systems in place to ensure its operations address the specific health and safety needs of women workers.
E.2.2	The company has management systems in place which ensure a safe and healthy working environment for employees and contractors.	Revised to improve incisiveness; to look at companies' efforts to track and improve their performance on this issue.	E.2.3	The company tracks its performance on occupational health and safety and acts upon the results, demonstrating continuous improvement in ensuring a safe and healthy working environment for all workers.
E.2.3	The company regularly trains and tests its employees in good health and safety practices.	Removed as considered less incisive.		
E.3	Collective Bargaining and Freedom of Association	Reworded to clarify scope.	E.3	Rights to Organise, Collective Bargaining and Freedom of Association
E.3.1	The company respects the rights of workers to freedom of association and collective bargaining.	Revised to improve coverage and clarity of scope	E.3.1	The company has systems in place to ensure its operations actively respect the rights of workers to organise, collective bargaining and freedom of association.
E.4	Worker Recourse		E.4	Worker Recourse
E.4.1	The company has formal grievance mechanisms in place for workers (and their organisations, where they exist) to raise workplace concerns in an easily accessible manner and have them addressed.	Revised to look at companies' efforts to track and improve their performance on this issue.	E.4.1	The company tracks the performance of its grievance mechanisms for workers and acts upon the results, demonstrating continuous improvement in effectively addressing claimants' concerns, through appropriate remedy.
E.5	Non-Discrimination and Equal Opportunity		E.5	Non-Discrimination and Equal Opportunity
E.5.1	The company bases employment relationships on the principles of equal opportunity, and actively prevents all forms of discrimination in the workplace.	Reworded to improve consistency and clarity of scope	E.5.1	The company has systems in place to ensure its operations base their employment relationships on the principle of equal opportunity, actively preventing all forms of discrimination in the workplace and promoting workforce diversity.
E.6	Elimination of Forced Labour and Child Labour		E.6	Elimination of Forced Labour and Child Labour
E.6.1	The company works to prevent all forms of forced, compulsory, trafficked and child labour at its mine sites and in its supply chains.	Revised to improve assessability, clarity, consistency and alignment	E.6.1	The company has systems in place to carry out regular due diligence to identify and assess potential risks of all forms of forced, compulsory, trafficked and child labour in its areas of operations and its supply chains, and to design and implement strategies to address identified risks.
F. Environmental Responsibility				
F.1	Environmental Stewardship		F.1	Environmental Stewardship
		New commitment indicator to improve coverage and incisiveness within the Issue Area	F.1.1	The company commits to manage its environmental impacts systematically, through the mitigation hierarchy approach.

F.1.1	The company has management systems in place to conduct assessments of environmental impacts through an integrated approach, and to disclose them.	Reworded to improve consistency	F.1.2	The company has systems in place to ensure its operations conduct regular assessments of its environmental impacts through an integrated approach, and to disclose them.
F.1.2	The company has systems in place for monitoring, evaluating and reporting on the management of the environmental impacts of its operations.	Reworded to improve consistency and clarity	F.1.3	The company tracks its performance on managing its environmental impacts and acts upon the results, demonstrating continuous improvement in avoiding, minimising, mitigating and offsetting these impacts.
F.2	Tailings Management		F.2	Tailings Management
F.2.1	The company has systems in place for tailings management, including regular internal and external review and assurance processes.	Revised to improve incisiveness to look at companies' efforts to track and improve their performance on this issue. F.2.2 integrated within F.2.1. to reduce overlap.	F.2.1	Where applicable, the company tracks its performance on addressing potential risks related to its tailings facilities, including seepage and tailings dam failure, and acts upon the results, demonstrating continuous improvement in avoiding, minimising and mitigating these risks.
F.2.2	The company designs its tailings, waste and process facilities to prevent seepage and tailings dam failure and to protect the environment and communities from contamination and other impacts, including through the management of risks associated with potential changes.			
F.3	Air		F.3	Air
F.3.1	The company publishes mine-site level air quality monitoring data in a timely manner.	Reworded to improve consistency and clarity	F.3.1	The company publicly discloses mine-site level air quality monitoring data, throughout its operations.
F.4	Water		F.4	Water
F.4.1	The company implements a water management system that reflects its commitment and accountability to the rights and needs of the affected area, including the environment, communities, farmers, and water-dependent industries.	Revised to improve coverage, incisiveness and clarity of scope	F.4.1	The company has systems in place to ensure its operations identify and assess their impacts on water quality and quantity in the catchments or regional basins they operate in, and to design and implement water stewardship strategies and plans to respect the water needs and rights of the affected area, including the environment, communities, farmers, and other water-dependent industries.
F.4.2	The company publishes mine-site level water quality monitoring data in a timely manner.	Revised to a mine-site indicator		
		New effectiveness indicator included to improve coverage and incisiveness to look at companies' efforts to track and improve performance on this issue.	F.4.2	The company tracks its performance on water management, both for quality and quantity, and acts upon the results, demonstrating continuous improvement in reducing its water consumption and its adverse impacts on water quality, to improve water security for other stakeholders in the catchments or regional basins it operates in.
F.5	Noise and Vibration		F.5	Noise and Vibration
F.5.1	The company has systems in place to limit the impacts of noise and vibration on communities, properties, and wildlife.	Reworded to improve clarity	F.5.1	The company has systems in place to ensure its operations limit the impacts of noise and vibration on affected communities, structures, properties, and wildlife.
F.6	Biodiversity	Reworded to reflect scope	F.6	Biodiversity and Ecosystem Services
		New indicator on 'no-go' zones to improve coverage.	F.6.1	The company commits to not explore or mine in World Heritage Sites and to respect other terrestrial and marine protected areas that are designated to conserve cultural or natural heritage.

F.6.1	The company applies a mitigation hierarchy approach for biodiversity management.	Revised to improve incisiveness to look at companies' efforts to track and improve their performance on this issue.	F.6.2	The company tracks its performance on biodiversity and ecosystem services management and acts upon the results, demonstrating continuous improvement in avoiding, minimising, mitigating and offsetting its impacts.
F.7	GHG Emissions and Energy Efficiency	Reworded to reflect scope	F.7	Climate Change and Energy Efficiency
		New indicator on climate adaptation to improve coverage	F.7.1	The company has systems in place to identify and assess the potential implications of climate change on its operations and its impacts on communities, workers and the environment, and to design and implement appropriate adaptation strategies.
F.7.1	The company monitors and minimises GHG emissions generated by its activities.	Improved incisiveness to look at companies' efforts to track and improve their performance on this issue.	F.7.2	The company tracks its performance on managing the greenhouse gases (GHG) emissions generated by its activities and acts upon the results, demonstrating continuous improvement in minimising them.
F.7.2	The company monitors and improves energy efficiency throughout its operations.	Improved incisiveness to look at companies' efforts to track and improve their performance on this issue.	F.7.3	The company tracks its performance on managing energy consumption throughout its operations and acts upon the results, demonstrating continuous improvement in energy efficiency.
F.8	Hazardous Materials Management		F.8	Hazardous Materials Management
F.8.1	The company systematically identifies and manages potential risks linked to the handling, storage, emission and disposal of hazardous materials.	Reworded to improve consistency and clarity	F.8.1	The company has systems in place to ensure its operations identify and assess potential risks related to the transportation, handling, storage, emission and disposal of hazardous materials, and to design and implement strategies and plans to address identified risks.
F.9	Emergency Preparedness		F.9	Emergency Preparedness
F.9.1	The company has systems in place for developing and maintaining emergency preparedness and response plans.	Removed as considered less incisive.		
F.9.2	The company engages local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans throughout its operations.	Reworded to improve consistency	F.9.1	The company has systems in place to ensure its operations engage local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans.
F.9.3	The company makes public all relevant information about financial assurance that is provided for disaster management and recovery	Reworded to improve consistency	F.9.2	The company publicly discloses all relevant information about financial assurance that is provided for disaster management and recovery, throughout its operations.

*Topic and indicator codes in these two columns refer to the original codes used in the RMI Draft Methodology report.

**The order of most topics within the Community Wellbeing issue area has changed, as Human Rights has become the first topic. For ease of comparison, the topics and indicators are presented in the new order.

Appendix 3. Revisions to RMI mine-site indicators

Original set of RMI mine-site indicators	Final set of RMI mine-site indicators
<p>MS1. Assessment of impacts. The operating company actively and inclusively engages affected communities in regular assessments of its impacts and in sharing the results, throughout the life of the mine.</p>	<p>MS1. Local procurement. The operating company tracks and regularly reports on its performance on developing procurement opportunities for businesses in its area of operation.</p>
<p>MS2. Local employment. The operating company has measures in place to support local employment opportunities, particularly for women and youth.</p>	<p>MS2. Local employment. The operating company tracks and regularly reports on its performance on providing direct employment opportunities for people in its area of operation.</p>
<p>MS3. Grievance. The operating company can demonstrate implementation of a grievance mechanism and claimants' effective access to remedy.</p>	<p>MS3. Community grievance mechanism. The operating company tracks and regularly reports on the performance of its community grievance mechanism in providing appropriate remedy, taking into account the views of local communities.</p>
<p>MS4. Water. The operating company actively and inclusively engages local communities in decisions on water management and in implementing and sharing the results of water quality monitoring activities.</p>	<p>MS4. Workers grievance mechanism. The operating company tracks and regularly reports on the performance of its workers' grievance mechanism in providing appropriate remedy, taking into account the views of its workers.</p>
<p>MS5. Emergency Preparedness. The operating company engages local authorities, workers and communities in developing, communicating and testing its emergency preparedness and response plans.</p>	<p>MS5. Water quality and quantity. The operating company tracks and regularly reports on its performance on reducing its water consumption and its adverse impacts on water quality, to improve water security for other stakeholders in the catchment or regional basin it operates in.</p>
	<p>MS6. Biodiversity management. The operating company tracks and regularly reports on its performance on applying a mitigation hierarchy approach to the management of its biodiversity impacts.</p>