Equivalency between WGC's RGMPs and MAC's TSM

The Mining Association of Canada and the World Gold Council (WGC) are committed to cross-recognition of our respective standards: Towards Sustainable Mining (TSM) and the Responsible Gold Mining Principles (RGMPs). Although these standards are structured differently, their intent is similar which is to drive improvements in member's ESG performance on the ground and to provide assurance to external stakeholders that metals are produced in an ethical and responsible manner.

TSM and the RGMPs overlap in a number of critical areas, including all eight of TSM's protocols. These eight protocols, for the most part, include a greater level of detail and granularity compared to the corresponding, principle based RGMP requirements. To maximize efficiency, the following guidance is provided to companies seeking to apply both TSM and the RGMPs:

- **If a company/site would like to apply both frameworks at the same time** they should:
  o implement the eight TSM protocols at a Level A or above as outlined in Table 1; AND
  o implement the RGMPs which are not covered by TSM; these are listed in Table 2.

- **If a company/site already has TSM in place** at or above the level listed in Table 1, they are deemed compliant with the referenced RGMPs (right-hand column). If an RGMP is referenced more than once in Table 1, all the associated TSM protocols must be met (at the level indicated) for equivalency to be recognised for that RGMP (see Table 3 for more details). To reach full conformance with all the RGMPs the company/site needs to additionally put in place the RGMPs listed in Table 2.

- **If a company/site is already in full conformance with the RGMPs** and they want to implement TSM, they should use the source TSM protocols for all eight areas listed in Table 1 to ensure they comply with the appropriate detail at TSM level of their choice.

This guidance can be used by service providers to conduct assurance/verification on both frameworks at the same time. In such cases, the service provider must be TSM certified and also meet the RGMP assurance service provider criteria. They would be required to produce separate letters/reports, one for each framework.

Table 1 TSM scores required for the corresponding RGMPs to be recognised as equivalent*

TSM Protocol	Indicator	TSM Level Required	Corresponding RGMPs
Indigenous and Community Relationships			
	1. Community of Interest (COI) Identification	AA	2.1, 2.2, 7.1, 7.2
	2. Effective COI Engagement and Dialogue	A	2.1, 2.2, 7.1, 7.2, 7.4
	3. Effective Indigenous Engagement and Dialogue	A	2.2, 7.1, 7.2, 7.3, 7.4, 7.6
	4. Community Impact and Benefit Management	A	2.1, 2.4, 3.2, 7.3, 7.5, 8.1, 8.5
	5. COI Response Mechanism	A	2.2, 2.5
Energy and Greenhouse Gas Emissions Management			
	1. Corporate climate change management	A	10.3
	2. Facility climate change management	A	10.3, 10.4
	3. Facility performance targets and reporting	A	10.4
Tailings Management			
	1. Tailings management policy and commitment	A	8.2 (partial)**
	2. Tailings management system and emergency preparedness	A	8.2 (partial)**
	3. Assigned accountability and responsibility for tailings management	A	8.2 (partial)**
	4. Annual tailings management review	A	8.2 (partial)**
	5. Operation, maintenance, and surveillance	A	8.2 (partial)**
Biodiversity Conservation Management			
	1. Corporate biodiversity conservation commitment, accountability, and communications	AAA	8.1, 9.1, 9.2
	2. Biodiversity conservation planning and implementation	A	2.4, 7.1, 8.1, 9.1
	3. Biodiversity conservation reporting	A	8.1, 9.1
Safety and Health			
	1. Commitments and Accountability	A	4.1
	2. Planning and Implementation	A	4.1, 4.2, 4.3, 4.4
	3. Training, Behaviour and Culture	A	4.1, 4.2, 4.3
	4. Monitoring and Reporting	A	4.1, 4.2
Water Stewardship			
	1. Water Governance	A	10.1, 10.2
	2. Operational Water Management	AA	10.1, 10.2
	3. Watershed-scale Planning	A	10.1, 10.2
	4. Water Reporting and Performance	A	10.1, 10.2
Crisis Management and Communication Planning			
	1. Crisis Management and Communications Preparedness	Yes	2.1, 4.4
	2. Review	Yes	2.1, 4.4
	3. Training	Yes	2.1, 4.4
Prevention of Child and Forced Labour			
	Preventing Forced Labour	Yes	6.3
	Preventing Child Labour	Yes	6.3

* If an RGMP is referenced more that once, all the associated TSM protocols must be met at the indicated level for equivalency to be recognised (see Table 3 for details). For example, for RGMP 2.2 to be cross-recognised I&CR 1, 2 and 5 must be met at the levels indicated.

** The TSM Tailings Protocol (Level A), covers the requirements in RGMP 8.2 related to Tailings management but not the requirements related to heap-leach facilities or large-scale water infrastructure, nor the prohibition of riverine or shallow submarine tailings for new mines. RGMP 8.2 is therefore also included in Table 2.

Table 2 is the list of RGMPs which need to be implemented in addition to the eight TSM protocols (at the level listed in Table 1) to reach conformance with both TSM and the RGMPs.

1.1 Legal Compliance - As a minimum expectation, we will comply with applicable host and home country laws and relevant international law, and will maintain systems to deliver this objective.
1.2 Code of Conduct - We will maintain a code of conduct to make clear the standards with which we expect our employees, and those with whom we do business, to comply. We will actively promote awareness of our code and implement systems to monitor and ensure compliance.
1.3 Combating bribery and corruption - We will put in place controls to combat bribery and corruption in all their forms, conflicts of interest and anti-competitive behaviour by employees, agents or other company representatives.
1.4 Political contributions - We will disclose the value and beneficiaries of financial and in-kind political contributions that we make, whether directly or through an intermediary.
1.5 Transparency - We will publish our tax, royalty and other payments to governments annuallyby country and project. We support the principles of the Extractive Industries Transparency Initiative (EITI) and will encourage governments to promote greater transparency around revenue flows, mining contracts and the beneficial ownership of licence holders.
1.6 Taxes and transfer pricing - We will pay the taxes and royalties required by host country codes. We will seek to ensure that transfer pricing outcomes are in line with fair business practices and value creation.
1.7 Accountabilities and reporting - We will assign accountability for our sustainability performance at Board and/or Executive Committee level. We will report publicly each year on our implementation of the Responsible Gold Mining Principles.
2.3 Due diligence - We will regularly and systematically conduct due diligence to identify human rights, corruption and conflict risks associated with our activities and in our supply chain with the intention of preventing adverse impacts. We will exercise risk-based due diligence on those entities to which companies we sell our products.
3.1 Supply Chain Policy - We will adopt and publish a Supply Chain Policy and support our contractors and suppliers to operate responsibly and to standards of ethics, safety, health, human rights and social and environmental performance comparable with our own. We will conduct risk-based monitoring of compliance.
3.3 Market access for ASM - We support access to legitimate markets for those artisanal and small-scale miners (ASM) who respect applicable legal and regulatory frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalisation. We will consider supporting government initiatives to reduce and eliminate the use of mercury by ASM.
5.1 UN Guiding Principles - We will adopt and implement policies, practices and systems based on the UN Guiding Principles on Business and Human Rights.
5.2 Avoiding complicity - We will seek to ensure that we do not cause, and are not complicit in, human rights abuses either directly or through our business relationships.
5.3 Security and human rights - We will manage security-related human rights risks through implementation of the Voluntary Principles on Security and Human Rights.
5.4 Conflict - We will implement the Conflict Free Gold Standard. We will ensure that when we operate in conflict affected or high-risk areas, our operations do not cause, support or benefit unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law.
6.1 Wages and benefits - We will ensure that our workforce receives fair wages and benefits relative to relevant national and local benchmarks, norms and regulations.

6.2 Preventing discrimination and bullying - We will engage regularly and constructively with our employees and their representatives and strive to ensure a workplace free from bullying or harassment and unfair discrimination.
6.4 Freedom of association and collective bargaining - We will uphold the legal rights of our workforce to associate with others and to join, or refrain from joining, labour organisations of their choice and to bargain collectively without discrimination or retaliation.
6.5 Diversity - We will implement policies and practices to promote diversity at all levels of the company, including the representation and inclusion of historically under-represented groups and will report on our progress.
6.6 Woman and mining - We are committed to identifying and resolving barriers to the advancement and fair treatment of women in our workplaces. Through our employment, supply chain, training and community investment programmes, we will aim to contribute to the socio-economic empowerment of women in the communities associated with our operations
6.7 Raising concerns - We will provide a confidential mechanism through which employees and others associated with our activities may raise ethical concerns and which will provide protection from retaliation for those who raise concerns in good faith.
7.7 Cultural heritage - We will seek to preserve cultural heritage from adverse impacts associated with project activities, including through our impact assessments. We will put in place chance finds procedures at all relevant operations.
7.8 Resettlement - We will seek to avoid involuntary resettlement. Where this is unavoidable, we will proceed on the basis of meaningful consultation with affected   communities a publicly available planning framework, the restoration of established livelihoods, and the provision of fair and timely compensation. We will seek to minimise adverse impacts on displaced people.
8.2 Tailings and waste management - We will design, build, manage and decommission tailings storage and heap-leaching facilities and large-scale water infrastructure using ongoing management and governance practices in line with widely supported good practice guidelines. We will not develop a new mine that would involve the use of riverine or shallow submarine tailings.
8.3 Cyanide and hazardous materials - We will identify and manage potential risks relating to the transportation, handling, storage and disposal of all hazardous materials. Where our operations use cyanide we will ensure that our arrangements for the transport, storage, use and disposal of cyanide are in line with the standards of practice set out in the International Cyanide Management Code.
8.4 Mercury - We will not use mercury to extract gold in our processing facilities nor accept gold produced by third parties using mercury. We support the Minamata Convention's objective of reducing mercury emissions for the protection of human health and the environment. We will identify point source mercury emissions to the atmosphere arising from our activities and minimise them. We will only sell mercury thereby captured for uses recognised as acceptable by international conventions.
9.3 Land use and deforestation - We recognise the importance of integrated land-use planning. In determining our project footprint, we will give meaningful consideration to the land access needs of nearby communities and to the preservation of biodiversity. We will aim to minimise deforestation arising from our activities.
9.4 Mine closure - We will plan for the social and environmental aspects of mine closure in consultation with authorities, our workforce, affected communities and other relevant stakeholders. We will make financial and technical provision to ensure planned closure and post-closure commitments are realised, including the rehabilitation of land, beneficial future land use, preservation of water sources and prevention of acid rock drainage and metal leaching.

Table 3 – RGMPs which are recognised as conformant if the TSM Protocols listed are implemented at the A level (or higher if indicated).

RGMP	Corresponding TSM Protocol
2.1	I&CR Protocols 1 (AA), 2, 4, CM&C Protocols 1,2,3
2.2	I&CR Protocols 1 (AA), 2, 3, 5
2.4	I&CR Protocol 4, Biodiversity Protocol 2
2.5	I&CR Protocol 5
3.2	I&CR Protocol 4
4.1	Safety and Health Protocol 1, 2, 3, 4
4.2	Safety and Health Protocol 2, 3, 4
4.3	Safety and Health Protocol 2, 3
4.4	Safety and Health Protocol 1, 2, 3, CM&C Protocols 1,2,3
6.3	Child/ Forced Labour Protocol 1, 2, 3
7.1	I&CR Protocols 1 (AA),2, 3, Biodiversity Protocol 2
7.2	I&CR Protocols 1 (AA), 2, 4
7.3	I&CR Protocols 3, 4
7.4	I&CR Protocols 2, 3
7.5	I&CR Protocol 4
7.6	I&CR Protocol 3
8.1	I&CR Protocol 4, Biodiversity Protocol 1 (AAA), 2, 3
8.2	Tailings Protocols 1, 2, 3, 4 (and included in Table 2
8.5	I&CR Protocol 4
9.1	Biodiversity Protocols 1 (AAA), 2, 3
9.2	Biodiversity Protocol 1(AAA)
10.1	Water Protocols 1, 2 (AA), 3, 4
10.2	Water Protocols 1, 2 (AA), 3, 4
10.3	Energy and GHG Protocols 1,2
10.4	Energy and GHG Protocols 2, 3

The above 25 RGMPs are deemed equivalent if the corresponding TSM protocols are implemented. The remaining 26 RGMPs listed here are supplementary and included in Table 2 (plus 8.2 which is in both).

1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 2.3, 3.1, 3.3, 5,1, 5.2, 5.3, 5.4, 6.1. 6.2, 6.4, 6.5, 6.6, 6.7, 7.7, 7.8, 8.2, 8.3, 8.4, 9.3, 9.4