



WORLD
GOLD
COUNCIL

EQUIVALENCY BENCHMARK

World Gold Council's Responsible
Gold Mining Principles compared
with ICMM's Mining Principles

INTRODUCTION

Equivalency Benchmark of World Gold Council's Responsible Gold Mining Principles and the ICMM's Mining Principles

Responsible Gold Mining Principles version 2019 (no revisions scheduled)
ICMM's Mining Principles version 2020 (no revisions scheduled)

Introduction

The Responsible Gold Mining Principles

The Responsible Gold Mining Principles (RGMPs) is a framework that sets out clear expectations for consumers, investors and the downstream gold supply chain as to what constitutes responsible gold mining. The World Gold Council (WGC) has set out the Principles that it believes address key environmental, social and governance issues for the gold mining sector. Companies implementing the RGMPs will be required to annually disclose their performance against the RGMPs and obtain external assurance from an independent assurance provider. Assurance is conducted at both corporate and site levels, with corporate assurance focusing on policies and systems and site-level assurance focusing on the implementation of the policies and systems.

ICMM's Mining Principles and ICMM Performance Expectations

ICMM's Mining Principles and ICMM Performance Expectations (PEs) define good practice environmental, social and governance requirements for the industry through a comprehensive set of PEs. Implementation is supported by robust site-level validation, transparent disclosure of the outcomes and credible assurance of corporate sustainability reports. ICMM's Mining Principles and ICMM PEs are a condition of membership for ICMM's company members and, as a result, apply to more than 650 assets in over 50 countries, driving performance improvements at scale.

Purpose

WGC's Responsible Gold Mining Principles are aligned to other responsible mining initiatives through a shared objective of improving environmental, social and governance practices at the operational level. However, there are points of difference between almost all standards and initiatives. The purpose of this and other equivalency benchmarks is to:

- Transparently demonstrate to customers, investors, and other interested parties the extent to which the RGMPs are equivalent to the requirements of other standards and initiatives.
- Avoid the risk of different interpretations of equivalency by stakeholders, by coming to mutual agreements between WGC and the owners of other standards and initiatives.
- Enable all interested parties to have access to a mutually agreed equivalency assessment, that would enable efficient joint third-party assessments of implementation progress where appropriate.
- Facilitate cross-recognition of companies' assurance by other standards and initiatives where the assurance process of the other scheme is equally credible and robust as WGC's Assurance Framework, to avoid duplication of third-party assessment work.

The equivalency benchmarks

These benchmarks provide an assessment of how the requirements of WGC's RGMPs are equivalent to or differ from ICMM's Mining Principles and associated PEs and vice versa. The two standards have been compared, both in terms of 'stringency' and 'prescriptiveness'. These benchmarks were mutually agreed between the WGC and ICMM in August 2020.

- The second benchmark is the RGMP-centric benchmark and it assesses how the Mining Principles meet, partially meet, exceed or do not meet the RGMPs.
- The first benchmark is the Mining Principles-centric benchmark which provides the assessment of the extent to which the RGMPs meet, partially meet, exceed or do not meet the requirements of ICMM's Mining Principles.

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Process to develop the benchmark

The benchmarks have been delivered through an iterative engagement process between the WGC and ICMM, with external consultant support from The Dragonfly Initiative (TDI).

Basis for assessing equivalency

The assessment of equivalency has been made based on whether or not a requirement, or a combination of requirements from the RGMPs covers the same scope of activities and intended outcomes for each of the PE associated with ICMM's Mining Principles, including the individual company member commitments contained within ICMM's Position Statements. This can be the case even if there are minor differences in the detail or language used.

Prescriptiveness and stringency

The two Standards have been compared in terms of stringency and prescriptiveness.

- **Stringency:** Where one scheme requires a higher level of performance than the other, this is assessed as being more stringent. For example, the WGC and ICMM have assessed that RGMP 6.1 is more stringent than PE 3.5 because while both mandate that companies provide fair wages to their employees, RGMP 6.1 also mandates that employees receive fair benefits. PE 3.5 is silent on the issue.
- **Prescriptiveness:** Where the intent of corresponding requirements of both schemes are the same but one scheme is more prescriptive than the other and specifies more details around how to implement a requirement, this is assessed as being more prescriptive. For example, the WGC and ICMM have assessed that RGMP 7.8 is more prescriptive than PE 3.2 because while both seek to avoid involuntary resettlement, RGMP 7.8 requires that the resettlement planning framework be made publicly available. In this case, the two requirements are still deemed equivalent and the application of one effectively meets the other.

The notes in the right-hand column of the table explain the differences between the schemes in terms of either stringency or prescriptiveness. This column also contains information, where relevant, to articulate what gaps exist between the two standards.

There are cases where the requirements listed for a specific RGMP cover more elements than the specific PE in question, but where those elements are covered by another PE or PEs, the RGMP is not assessed as more stringent or more prescriptive. The full list of PEs which cover the elements of this RGMP can be found in the RGMP-centric benchmark.

Assessment outcomes

In order to provide guidance on the degree of equivalency between each individual requirement of the standards (e.g. RGMP), the following assessment outcomes are determined:

- **Meets:** Where the requirements of the other standard are equivalent to the other. In some instances, one standard may be more prescriptive than the other, which is reflected in the notes in the right-hand column of the table.
- **Exceeds:** Where elements of the two standards' requirements are equivalent but one is more stringent in some aspect(s).
- **Partially meets:**
 - o Where one standard is less stringent in some aspects. The difference in stringency is described in the notes and highlighted in yellow in the requirement text.
 - o Where one standard is less stringent in some aspects but also more stringent in other aspects, the differences in stringency on both sides is described in the notes and highlighted yellow in the requirement text.
- **Does not meet:** Where the issue is not covered by one standard at all, it is rated as 'does not meet'.
- **N/A:** Industry or standard-specific issues may be rated as n/a (not applicable) if they don't apply to the other standard e.g. the Responsible Jewellery Council Code of Practice includes requirements that apply to the sale, advertising and marketing of jewellery.

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How to read these tables

RGMPs-centric benchmark table

The table lists the WGC's RGMPs in the left-hand column. The next column of the table then indicates the relevant requirement(s) of the PEs for each RGMP and the middle column summarises the assessment of whether these are equivalent or not to that RGMP. The relevant text of the PEs which align with the RGMPs is included in the next column. Finally, the notes column provides an explanation for the assessment and summarises in brackets whether the PEs or RGMPs are more stringent or prescriptive. The yellow highlights show elements where either the RGMPs or PEs are more stringent than the other.

Mining Principles-centric benchmark table

The table lists ICMM's Mining Principles in the left-hand column, this includes ICMM's 10 Principles and beneath those, 38 PEs with any Position Statement commitments associated to those PEs. The next column of the table then indicates the relevant requirement(s) of the RGMPs for each PE and the middle column summarises the assessment of whether these are equivalent or not to that PE. The relevant text of the RGMPs which align with the PEs is included in the next column. Finally, the notes column provides an explanation for the assessment and summarises in brackets whether the RGMPs or PEs are more stringent or prescriptive. The yellow highlights show elements where either the PEs or RGMPs are more stringent than the other.

Using these tables for joint implementation or cross-recognition

These tables can be used to inform what a company will need to implement to meet the requirements of both the RGMPs and ICMM's Mining Principles and could inform joint validation for both schemes (recognising that in all cases, users should refer to the Guidance on Implementing and Assuring the RGMPs and the ICMM Validation Guidance).

Alternatively, for WGC members which have successfully conducted validation against the ICMM Mining Principles at a site in the last three years, this will be recognised under the WGC assurance framework such that the site does not need to repeat the assurance for those requirements deemed equivalent in the RGMP-centric table, for which it has already demonstrated conformance under the ICMM Mining Principles. A summary of the assessment results from the RGMP-centric equivalency table is provided below.

Summary of assessment results – RGMP-centric benchmark

ICMM PEs exceeds RGMP	ICMM PEs meets RGMP	ICMM PEs partially meets RGMP	ICMM PEs does not meet RGMP	N/A for ICMM PE
4 RGMPs	37 RGMPs	10 RGMPs	0 RGMPs	0 RGMPs
1.7, 9.2, 10.1, 10.3	1.1, 1.4, 1.5, 2.1, 2.2, 2.4, 2.5, 3.2, 4.1, 4.2, 4.3, 4.4, 5.1, 5.2, 5.3, 5.4, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 7.1, 7.2, 7.3, 7.5, 7.6, 7.7, 7.8, 8.1, 8.4, 8.5, 9.1, 9.3, 9.4, 10.2, 10.4	1.2, 1.3, 1.6, 2.3, 3.1, 3.3, 6.1, 7.4, 8.2, 8.3		

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Links to associated documents

Please see below links to resources and documents for both WGC's Responsible Gold Mining Principles and the ICMM's Mining Principles.

WGC's Responsible Gold Mining Principles

- [Responsible Gold Mining Principles \(RGMPs\)](#)
- [Assurance Framework for the RGMPs](#)
- [Guidance on Implementing and Assuring the RGMPs](#)

ICMM's Mining Principles

- [Mining Principles](#)
- [Assurance and Validation Procedure](#)
- [Validation Guidance](#)

RESPONSIBLE GOLD MINING PRINCIPLES-CENTRIC BENCHMARK TABLE

Assessment of the extent to which the requirements of ICMM's Mining Principles meet, partially meet, exceed or do not meet the requirements of World Gold Council's Responsible Gold Mining Principles.

PRINCIPLE 1

Ethical conduct: We will conduct our businesses with integrity including absolute opposition to corruption

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
	Governance				
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.	1.1	Meets	1.1 Establish systems to maintain compliance with applicable law. ¹	
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, 2.2	Partially Meets	1.3 Implement policies and standards consistent with the ICMM policy framework. 2.2. Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices by joint venture partners, suppliers and contractors, based on risk.	ICMM PEs do not require a Code of Conduct for member employees. <i>(RGMP is more stringent.)</i>
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.	1.2	Partially meets	1.2 Implement policies and practices to prevent bribery, corruption and to publicly disclose facilitation payments.	PE 1.2 does not specify anti-competitive behaviour or include agents or other company representatives. <i>(RGMP is more stringent.)</i> Note that ICMM also includes a more stringent requirement to disclose facilitation payments.
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	Meets	1.5 Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary.	

The yellow highlights that appear in either the 'Responsible Gold Mining Principles' or 'Full text of relevant ICMM Mining Principle' column indicate where either the RGMPs or PEs are more stringent than the other and provides an indication of how to address any gaps.

1. We recognise that in some countries a distinction is drawn between the terms 'stakeholders' and 'rights holders'. This distinction is not explicitly drawn in most other jurisdictions. Thus, in this document, we use the term 'stakeholders' to incorporate 'rights holders'.

PRINCIPLE 1

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
1.5	Transparency – We will publish our tax, royalty and other payments to governments annually by 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.	10.2, Transparency of Mineral Revenues PS	Meets	<p>10.2 Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project.</p> <ul style="list-style-type: none"> • Relevant individual company commitments for the Transparency of Mineral Revenues Position Statement can be summarised as follows: • Include a clear endorsement of efforts at the international level to enhance the transparency of mineral revenues, including EITI and submit a completed international-level self-assessment form to the EITI Secretariat. • Engage constructively in countries that are committed to implementing EITI. • Compile information on all material payments by country and by project at the appropriate levels of government. In EITI implementing countries, this should be provided to the EITI body assigned by government according to the agreed national template. Material payments by companies are expected to have been independently audited. • Support the public disclosure (ie publication) of material payments by country and by project. For EITI, this should be in line with the implementation approach adopted in-country.² 	ICMM's Transparency of Mineral Revenues Position Statement includes a requirement to, 'Engage constructively in appropriate forums to improve the transparency of mineral revenues – including their management, distribution or spending – or of contractual provisions on a level-playing field basis, either individually or collectively through ICMM,' which is equivalent to the RGMP requirement regarding encouraging transparency around revenue flows, mining contracts and beneficial ownership.
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.	1.1	Partially Meets	1.1 Establish systems to maintain compliance with applicable law.	<p>Paying taxes is implied in PE 1.1, but the issue of transfer pricing is not covered by the PEs.</p> <p><i>(RGMP is more stringent.)</i></p>

2. Benchmark users should refer to the full text of the [Transparency of Mineral Revenues Position Statement](#)

PRINCIPLE 1

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	1.4, 10.3, Mining Partnerships for Development PS, Water Stewardship PS, Climate Change PS	Exceeds	<p>1.4 Assign accountability for sustainability performance at the Board and/or Executive Committee level.</p> <p>10.3 Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards.</p> <p>Relevant individual company commitments for the Mining Partnerships for Development Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Provide an overview of their work on [socio-economic development] partnerships, as appropriate, in their annual external reporting and communications.³ <p>Relevant individual company commitments for the Water Stewardship Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Apply strong and transparent corporate water governance <p>1.4. Publicly report company water performance, material risks, opportunities and management response using consistent industry metrics and recognised approaches.⁴</p> <p>Relevant individual company commitments for the Climate Change Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Disclose Scope 1 and 2 greenhouse gas emissions on an annual basis and set emissions reduction targets at a corporate level.⁵ 	<p>PE 1.4 specifically requires reporting to GRI, which includes the GRI mandatory requirements whereas the RGMPs require reporting as per the RGMP Assurance Framework which does not.</p> <p><i>(ICMM PE is more stringent.)</i></p>

3. Benchmark users should refer to the full text of the [Mining Partnerships for Development Position Statement](#)

4. Benchmark users should refer to the full text of the [Water Stewardship Position Statement](#)

5. Benchmark users should refer to the full text of the [Climate Change Position Statement](#)

PRINCIPLE 2

Understanding our impacts: We will engage with our stakeholders and implement management systems so as to ensure that we assess, understand and manage our impacts, realise opportunities and provide remedy where needed

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
2.1	Risk management – We will maintain systems to identify and prevent or manage both the risks that face our operations and those which our activities may pose to others.	4.3	Meets	4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.	
2.2	Stakeholder engagement – We will listen to and engage with stakeholders in order to understand better their interests and concerns and integrate this knowledge into how we do business.	2.1, 10.1	Meets	2.1 Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities. 10.1 Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner.	
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 we sell our products.	4.2	Partially Meets	4.2 Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas when operating in – or sourcing from – a conflict-affected or high-risk area.	PE 4.2 does not include due diligence on 'entities to which we sell our products'. This requirement may not be relevant to ICMM members who trade bulk commodities and don't have identifiable customers. <i>(RGMP is more stringent.)</i>

PRINCIPLE 2

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
2.4	Impact assessment – We will conduct impact assessments that involve substantive environmental components, socio-economic (including human rights where relevant.) and cultural elements, and ensure that these are periodically updated. We will seek to identify and take account of local cumulative impacts. We will ensure that such assessments are accessible to affected communities and include plans to avoid, minimise, mitigate or compensate ⁶ for significant adverse impacts.	4.1	Meets	<p>4.1 Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.</p> <p>Note: These should cover issues such as air, water, biodiversity, noise and vibration, health, safety, human rights, gender, cultural heritage and economic issues. The consultation process should be gender sensitive and inclusive of marginalised and vulnerable groups.</p>	<p>RGMP 2.4 includes a requirement that impact assessments are periodically updated and that cumulative impacts and mitigation plan are accessible to affected communities.</p> <p>(RGMP is more prescriptive.)</p>
2.5	Resolving grievances – We will establish fair, accessible, effective and timely mechanisms through which complaints and grievances related to our activities can be raised and resolved and remedies implemented. Those raising such grievances in good faith will not face discrimination or retaliation as a result of raising their concerns.	9.3	Meets	<p>9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities.</p>	

6. Implementing companies are expected to adopt a mitigation hierarchy approach whereby they seek to anticipate and avoid adverse impacts. Where avoidance is not possible, they should seek to minimise or mitigate such impacts. Where residual impacts remain, companies should compensate/offset for significant risks or impacts to workers, affected communities and the environment.

PRINCIPLE 3

Supply Chain: We will require that our suppliers conduct their businesses ethically and responsibly as a condition of doing business with us

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	2.2	Partially Meets	2.2 Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices by joint venture partners, suppliers and contractors, based on risk.	PE 2.2 does not include a requirement to publish a supply chain policy or conduct risk-based monitoring of compliance. <i>(RGMP is more stringent.)</i>
3.2	Local procurement – We will promote access for local businesses to procurement and contracting opportunities generated by our operations and, where appropriate, provide capacity building support to help them improve their capabilities as suppliers.	9.2	Meets	9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life-cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.	
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.	9.4	Partially Meets	9.4 Collaborate with government, where appropriate, to support improvements in environmental and social practices of local artisanal and small-scale mining (ASM).	PE 9.4 does not require companies to support market access for legitimate ASM. <i>(RGMP is more stringent.)</i>

PRINCIPLE 4

Safety and health: We will protect and promote the safety and occupational health of our workforce (employees and contractors) above all other priorities and will empower them to speak-up if they encounter unsafe working conditions

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
	Social				
4.1	Safety – We will be pro-active in preventing fatalities and injuries to our workforce. Regular safety training will be conducted, and personal protective equipment will be supplied at no cost to our workforce. Our objective is zero harm.	5.1	Meets	<p>5.1 Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system.</p> <p>5.2 Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures.</p>	
4.2	Safety management systems – We will implement safety and health management systems based on internationally recognised good practice and focused on continuous improvement of our performance. We will engage regularly on these issues with our workforce and their representatives.	4.3	Meets	<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p>	
4.3	Occupational health and wellbeing -We will maintain high standards of occupational health and hygiene and implement risk-based monitoring of the health of our workforce based on occupational exposures. We will promote the physical and mental wellbeing of our workforce.	5.1, 5.2	Meets	<p>5.1 Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system.</p> <p>5.2 Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures.</p>	<p>The PEs are equivalent, noting that the RGMPs also specify the promotion of 'mental wellbeing'.</p> <p><i>(RGMP is more prescriptive.)</i></p>

PRINCIPLE 4

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
4.4	<p>Community health and emergency planning – We will identify and eliminate or minimise significant risks to the health and safety of local people as a result of our activities and those of our contractors. We will develop, maintain and test emergency response plans based on national regulations and international best practice guidelines, ensuring the involvement of potentially affected stakeholders.</p>	4.3, 4.4	Meets	<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p> <p>4.4 Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice.</p>	

PRINCIPLE 5

Human rights and conflict: We will respect the human rights of our workforce, affected communities and all those people with whom we interact

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	3.1	Meets	3.1 Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to.	
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.	3.1	Meets	3.1 Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to.	
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 ⁷ .	3.3	Meets	3.3 Implement, based on risk, a human rights and security approach consistent with 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.	4.2	Meets	4.2 Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas when operating in – or sourcing from – a conflict-affected or high-risk area.	

7. This does not imply that implementing companies have to become parties to the VPSHRs plenary process.

PRINCIPLE 6

Labour rights: We will ensure that our operations are places where employees and contractors are treated with respect and are free from discrimination or abusive labour practices

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	3.5	Partially Meets	3.5 Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher), and assign regular and overtime working hours within legally required limits.	PE 3.5 does not include 'benefits' only fair wages. <i>(RGMP is more stringent.)</i>
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.	3.4	Meets	3.4 Respect the rights of workers by: not employing child or forced labour, avoiding human trafficking, not assigning hazardous/dangerous work to those under 18, eliminating harassment and discrimination, respecting freedom of association and collective bargaining, and providing a mechanism to address workers grievances.	
6.3	Child and forced labour – We prohibit child labour, forced labour and modern slavery in our operations and in our supply chains.	3.4	Meets	3.4 Respect the rights of workers by: not employing child or forced labour, avoiding human trafficking, not assigning hazardous/dangerous work to those under 18, eliminating harassment and discrimination, respecting freedom of association and collective bargaining, and providing a mechanism to address workers grievances.	
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.	3.4	Meets	3.4 Respect the rights of workers by: not employing child or forced labour, avoiding human trafficking, not assigning hazardous/dangerous work to those under 18, eliminating harassment and discrimination, respecting freedom of association and collective bargaining, and providing a mechanism to address workers grievances.	
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.	3.8	Meets	3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.	PE3.8 does not explicitly mention 'historically under-represented groups' <i>(RGMP is more prescriptive.)</i>

PRINCIPLE 6

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
6.6	Women 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	3.8, 9.1, 9.2	Meets	<p>3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.</p> <p>9.1 Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate.</p> <p>9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life-cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.</p>	<p>PEs do not explicitly mention 'identifying and resolving barriers' to women's advancement <i>(RGMP is more prescriptive.)</i></p>
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.	3.4	Meets	<p>3.4 Respect the rights of workers by: not employing child or forced labour, avoiding human trafficking, not assigning hazardous/dangerous work to those under 18, eliminating harassment and discrimination, respecting freedom of association and collective bargaining, and providing a mechanism to address workers grievances.</p>	

PRINCIPLE 7

Working with communities: We will contribute to the socio-economic advancement of communities associated with our operations and treat them with dignity and respect

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
7.1	Community consultation – We will consult regularly and in good faith with the communities associated with our operations on matters of interest to them, and will take account of their perspectives and concerns.	9.3	Meets	9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities.	
7.2	Understanding communities – We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner. We will be alert to the dangers of causing differentially negative impacts on women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups. We will strive to ensure that the voices of these groups are heard, and that this knowledge is integrated into how we do business.	3.6, 3.7, 3.8	Meets	<p>3.6 Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts; and deliver sustainable benefits for Indigenous Peoples.</p> <p>3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur – as a result of relocation, disturbance of lands and territories or of critical cultural heritage – and capture the outcomes of engagement and consent processes in agreements.</p> <p>3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.</p>	
7.3	Creating local benefits – We will ensure that the communities associated with our operations are offered meaningful opportunities to benefit from our presence, including through access to jobs and training, and procurement opportunities for local businesses and social investment.	9.2	Meets	9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life-cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.	
7.4	Seeking community support – We will seek to obtain and sustain the broad-based support of communities affected by our activities.	9.3	Partially Meets	9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities.	PE 9.3 covers engagement but does not seek to obtain broad-based support of communities. <i>(RGMP is more stringent.)</i>

PRINCIPLE 7

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
7.5	In-migration – We will work with local authorities and community leaders to control or manage the impact of migratory influxes of people attracted by mine development.	4.1, 4.3	Meets	<p>4.1 Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.</p> <p>Note: These should cover issues such as air, water, biodiversity, noise and vibration, health, safety, human rights, gender, cultural heritage and economic issues. The consultation process should be gender sensitive and inclusive of marginalised and vulnerable groups.</p> <p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p>	<p>Influx is not specifically called out in ICMM PEs, although it is indirectly covered under PE 4.1 (impact mitigation).</p> <p>(RGMP is more prescriptive.)</p>
7.6	Indigenous Peoples – We will respect the collective and customary rights, culture and connection to the land of Indigenous Peoples. We will work to obtain their free, prior and informed consent where significant adverse impacts may occur during exploration, project design, operation and closure, including around the delivery of sustainable benefits.	3.6, 3.7, PS on Indigenous Peoples	Meets	<p>3.6 Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts; and deliver sustainable benefits for Indigenous Peoples.</p> <p>Relevant individual company commitments for the Indigenous Peoples and Mining Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Engage Indigenous Peoples to ensure that their rights and interest are respected and that they obtain sustainable benefits through the development of mining projects; 	<p>RGMPs do not specifically require applying the mitigation hierarchy, or agreeing and documenting engagement and consultation processes with relevant government authorities. RGMPs do not mention documenting the outcomes of engagement and consent processes in agreements and do not address situations where the</p>

PRINCIPLE 7

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
				<ul style="list-style-type: none"> • understand and respect their rights and interests regarding a project and its potential impacts; and • agree and document appropriate engagement and consultation processes with potentially impacted Indigenous Peoples and relevant government authorities⁸ <p>3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur – as a result of relocation, disturbance of lands and territories or of critical cultural heritage – and capture the outcomes of engagement and consent processes in agreements.</p> <hr/> <p>Relevant individual company commitments for the Indigenous Peoples and Mining Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • work to obtain the consent of indigenous communities for new projects (and changes to existing projects) that are located on lands traditionally owned by or under customary use of Indigenous Peoples and are likely to have significant adverse impacts on Indigenous Peoples; • collaborate with the responsible authorities to achieve outcomes consistent with the position statement where government is responsible for managing Indigenous Peoples' interests; and • address the likelihood that differences of opinion will arise and agree on avenues of recourse.⁹ 	<p>government is responsible for managing indigenous peoples or avenues of recourse.</p> <p>(ICMM is more prescriptive.)</p>

8. Benchmark users should refer to the full text of the [Indigenous Peoples and Mining Position Statement](#)

9. Ibid

PRINCIPLE 7

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	3.7, 4.3	Meets	<p>3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur – as a result of relocation, disturbance of lands and territories or of critical cultural heritage – and capture the outcomes of engagement and consent processes in agreements.</p> <p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p>	
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.	3.2	Meets	<p>3.2 Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people.</p>	<p>ICMM PE does not require that the resettlement planning framework be 'publicly available'.</p> <p>(RGMP is more prescriptive.)</p>

PRINCIPLE 8

Environmental stewardship: We will ensure that environmental responsibility is at the core of how we work

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
	Environment				
8.1	Managing environmental impacts – We will implement systems to monitor and manage our impacts on the environment. We will avoid, minimise, mitigate or compensate for significant adverse impacts on the environment relating to our activities.	6.4	Meets	6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment.	
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.	6.3, PS on Tailings	Partially Meets	<p>6.3 Design, construct, operate, monitor and decommission tailings disposal/storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure.</p> <p>Note: Riverine tailings, freshwater lake and/or shallow marine tailings disposal may be considered only if deemed to be the most environmentally and socially sound alternative, based on an objective and rigorous environmental and social impact assessment of tailings management alternatives. The scope of the assessment should be agreed between the member company and the host government.</p> <p>Relevant individual company commitments for the Tailings Governance Framework Position Statement can be summarised as follows:</p> <p>1. Accountability, Responsibility and Competency Accountabilities, responsibilities and associated competencies are defined to support appropriate identification and management of Tailings Storage Facility (TSF) risks.</p> <p>2. Planning and Resourcing The financial and human resources needed to support continued TSF management and governance are maintained throughout a facility's life cycle.</p>	<p>ICMM PE 6.3 does not apply to heap leach facilities or large-scale water infrastructure. It also leaves open the possibility that riverine tailings could be allowed for new mines under certain conditions.</p> <p><i>(RGMP is more stringent.)</i></p>

PRINCIPLE 8

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
			Partially Meets	<p>3. Risk Management Risk management associated with TSFs includes risk identification, an appropriate control regime and the verification of control performance.</p> <p>4. Change Management Risks associated with potential changes are assessed, controlled and communicated to avoid inadvertently compromising TSF integrity.</p> <p>5. Emergency Preparedness and Response Processes are in place to recognise and respond to impending failure of TSFs and mitigate the potential impacts arising from a potentially catastrophic failure.</p> <p>6. Review and Assurance Internal and external review and assurance processes are in place so that controls for TSF risks can be comprehensively assessed and continually improved.¹¹</p>	
8.3	<p>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.</p>	4.3, 6.4	Partially Meets	<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p> <p>6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment</p>	<p>ICMM PEs do not explicitly cover transportation, storage, use and disposal of hazardous materials or cyanide. However PE 4.3 and 6.4 would cover handling, storage and disposal of hazardous materials. Cyanide is not covered.</p> <p>(RGMP is more stringent.)</p>

10. Benchmark users should refer to the full text of the [Tailings Governance Framework Position Statement](#)

PRINCIPLE 8

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	PS on Mercury	Meets	<p>Relevant individual company commitments for the Position statement on Mercury Risk Management can be summarised as follows:</p> <ul style="list-style-type: none"> • Not open any mines designed to produce mercury as the primary product. • Apply materials stewardship to promote the responsible management of mercury produced from members' operations including that which naturally occurs in our products. • Identify and quantify point source mercury air emissions from operations and minimise them through the application of cost effective best available technology, using a risk-based approach. • Report significant point source mercury air emissions from operations consistent with GRI.¹¹ 	<i>(ICMM is more prescriptive.)</i>
8.5	Noise and dust – We will adopt and implement policies and practices to avoid or mitigate impacts on local communities and the environment arising from noise, dust, blasting and vibration.	4.3, 6.4	Meets	<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p> <p>6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment.</p>	Although noise, dust, blasting and vibration are not mentioned directly in the PEs they are implicit as common impacts in assessments and mitigation measures.

¹¹. Benchmark users should refer to the full text of the [Mercury Risk Management Position Statement](#)

PRINCIPLE 9

Biodiversity, land use and mine closure: We will work to ensure that fragile ecosystems, habitats and endangered species are protected from damage and will plan for responsible mine closure

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
9.1	Biodiversity – We will implement biodiversity management plans. At a minimum, we will seek to ensure that there is no net loss of critical habitat. Where opportunities arise to do so, we will work with others to produce a net gain for biodiversity. We will incorporate both scientific and traditional knowledge in designing adaptation strategies in ecosystem management and environmental assessment.	7.2, PS on Mining and Protected Areas	Meets	<p>7.2 Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no net loss of biodiversity.</p> <hr/> <p>Relevant individual company commitments for the Mining and Protected Areas Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> To ensure that potential adverse impacts on biodiversity from new operations or changes to existing operations are adequately addressed throughout the project cycle and that the mitigation hierarchy is applied¹² 	
9.2	World Heritage Sites – We will not explore or seek to develop new mining operations in an area designated as a World Heritage Site.	7.1, PS on Mining and Protected Areas	Exceeds	<p>7.1 Neither explore nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated.</p> <hr/> <p>Relevant individual company commitments for the Mining and Protected Areas Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Respect legally designated protected areas and ensure that any new operations or changes to existing operations are not incompatible with the value for which they were designated. Not explore or mine in World Heritage properties and ensure operations adjacent to World Heritage properties are not incompatible with the outstanding universal value for which these properties are listed.¹³ 	<p>PE 7.1 refers to respecting legally designated protected areas and also covers changes to existing operations.</p> <p>(ICMM PE is more stringent.)</p>

12. Benchmark users should refer to the full text of the [Mining and Protected Areas Position Statement](#)

13.Ibid

PRINCIPLE 9

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
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.	4.3, 7.2	Meets	<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p> <p>7.2 Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no net loss of biodiversity.</p>	<p>Although land use planning is not mentioned in the PEs, this topic is indirectly addressed through the ESIA process. The specific requirement to 'minimise deforestation' is not mentioned in the PEs but captured under PE 7.2 regarding biodiversity.</p> <p><i>(RGMP is more prescriptive.)</i></p>
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.	6.1	Meets	<p>6.1 Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised.</p>	<p>RGMP is more prescriptive regarding beneficial future land-use, preservation of water sources and prevention of acid rock drainage and metal leaching.</p> <p><i>(RGMP is more prescriptive.)</i></p>

PRINCIPLE 10

Water, energy and climate change: We will improve the efficiency of our use of water and energy, recognising that the impacts of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our licence to operate

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
10.1	<p>Water efficiency – We will use water efficiently and responsibly and in co-operation with authorities and, where possible, other users. When we operate in water-stressed areas, we will take proportionate and practicable steps to improve the efficiency of our water use and seek to reduce our water footprint, including, where possible, through increased recycling.</p>	6.2, 8.1, PS on Water Stewardship	Exceeds	<p>6.2 Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>8.1 In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources and materials.</p> <p>Relevant individual company commitments for the Water Stewardship Position Statement can be summarised as follows:</p> <p>1. Apply strong and transparent corporate water governance</p> <ul style="list-style-type: none"> 1.1 Publicly disclose the company's approach to water stewardship. 1.2. Allocate clear responsibilities and accountabilities for water – from board and corporate to site levels. 1.3. Integrate water considerations in business planning. 1.4. Publicly report company water performance, material risks, opportunities and management response using consistent industry metrics and recognised approaches. <p>2. Manage water at operations effectively</p> <ul style="list-style-type: none"> 2.1. Maintain a water balance and understand how it relates to the cumulative impact of other users. 2.2. Set context-relevant water targets or objectives for sites with material water-related risks. 	<p>The RGMP does not address integration into business planning, reporting against industry metrics or setting context-relevant targets.</p> <p>(ICMM PE is more stringent.)</p>

PRINCIPLE 10

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
				<p>2.3. Proactively manage water quantity and quality to reduce potential socioenvironmental impacts and realise opportunities.</p> <p>2.4. Ensure all employees have access to clean drinking water, gender appropriate sanitation facilities and hygiene at their workplace.</p> <p>3. Collaborate to achieve responsible and sustainable water use</p> <p>3.1. Identify, evaluate, and respond to catchment-level water-related risks and opportunities.</p> <p>3.2. Identify and engage proactively and inclusively with stakeholders that may influence or be affected by a site's water use and discharge.¹⁴</p>	
10.2	<p>Water access and quality – Recognising that access to water is a human right and fundamental ecosystem requirement, we will manage our operations so as to ensure that they do not adversely affect the overall quality of catchment water resources available to other users.</p>	6.2, PS on water stewardship	Meets	<p>6.2 Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>Relevant individual company commitments for the Water Stewardship Position Statement can be summarised as follows:</p> <p>2. Manage water at operations effectively</p> <p>2.1. Maintain a water balance and understand how it relates to the cumulative impact of other users.</p> <p>2.2. Set context-relevant water targets or objectives for sites with material water-related risks.</p> <p>2.3. Proactively manage water quantity and quality to reduce potential socioenvironmental impacts and realise opportunities.</p>	<i>[ICMM is more prescriptive.]</i>

14. Benchmark users should refer to the full text of the Water Stewardship Position Statement

PRINCIPLE 10

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
				<p>2.4. Ensure all employees have access to clean drinking water, gender appropriate sanitation facilities and hygiene at their workplace.</p> <p>3. Collaborate to achieve responsible and sustainable water use</p> <p>3.1. Identify, evaluate, and respond to catchment-level water-related risks and opportunities.</p> <p>3.2. Identify and engage proactively and inclusively with stakeholders that may influence or be affected by a site's water use and discharge.¹⁵</p>	
10.3	<p>Combating climate change – We support the objectives of global climate accords, through avoidance, reduction or mitigation of carbon emissions. Where relevant, we will work to enhance the ability of our operations and nearby communities to be resilient to the effects of climate change.</p>	6.5. PS on Climate Change	Exceeds	<p>6.5 Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO₂ equivalent (GHG) emissions.</p> <p>Relevant individual company commitments for the Climate Change Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Implement governance, engagement and disclosure processes to ensure climate change risks and opportunities are considered in business decision-making. • Advance operational level adaptation and mitigation solutions, taking into consideration local opportunities and challenges. • Engage with host communities on our shared climate change risks and opportunities and help host communities understand how they can adapt to the physical impact of climate change.¹⁶ 	<p>RGMP does not require incorporation of climate change into business decision-making.</p> <p><i>(ICMM's Mining Principles are more stringent.)</i></p>

15. Ibid

16. Benchmark users should refer to the full text of the Climate Change Position Statement

PRINCIPLE 10

	Responsible Gold Mining Principles (RGMPs)	Relevant Mining Principles	Equivalency rating	Full text of relevant ICMM Mining Principle	Equivalency notes
10.4	Energy efficiency and reporting – We will work to improve the efficiency of our energy use and to minimise our greenhouse gas emissions intensity. We will measure and report on our CO ₂ equivalent emissions in line with accepted reporting standards.	6.5, PS on Climate Change	Meets	<p>6.5 Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO₂ equivalent (GHG) emissions</p> <p>Relevant individual company commitments for the Position statement on Climate Change can be summarised as follows:</p> <ul style="list-style-type: none"> • Disclose Scope 1 and 2 greenhouse gas emissions on an annual basis and set emissions reduction targets at a corporate level. 	

Performance Expectations 8.2 and 10.4 are not included in the equivalency analysis for any of the RGMPs above because they are not covered or not needed in order to meet the RGMPs.

ICMM'S MINING PRINCIPLES-CENTRIC BENCHMARK TABLE

Assessment of the extent to which the requirements of World Gold Council's Responsible Gold Mining Principles meet, partially meet, exceed or do not meet the requirements of ICMM's Mining Principles.

PRINCIPLE 1

Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
1.1	Establish systems to maintain compliance with applicable law. Note: ICMM's member companies already comply with all applicable law in the countries that they operate in. However, many stakeholders say they want mining companies to show that they have strong systems that ensure legal compliance.	1.1	Meets	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	Implement policies and practices to prevent bribery, corruption and to publicly disclose facilitation payments.	1.3	Partially meets	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.	RGMPs do not explicitly address the publication of facilitation payments. (ICMM PE is more stringent) Note that the RGMP is more stringent in addressing anti-competitive behaviour and applying to agents or other company representatives.
1.3	Implement policies and standards consistent with the ICMM policy framework.	N/A	N/A	No equivalent RGMP requirement	
1.4	Assign accountability for sustainability performance at the Board and/or Executive Committee level.	1.7	Meets	1.7 Accountabilities and reporting – We will assign accountability for our sustainability performance at the Board and/or Executive Committee level. We will report publicly each year on our implementation of the Responsible Gold Mining Principles.	
1.5	Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary.	1.4	Meets	1.4 Political contributions – We will disclose the value and beneficiaries of financial and in-kind political contributions which we make, whether made directly or through an intermediary.	

The yellow highlights that appear in either the 'ICMM Mining Principles' or the 'Full text of relevant Responsible Gold Mining Principles' column indicate where either the PEs or RGMPs are more stringent than the other and provides an indication of how to address any gaps.

PRINCIPLE 2

Integrate sustainable development in corporate strategy and decision-making processes

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
2.1	Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities.	All	Partially meets	<p>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.</p>	<p>RGMPs do not explicitly require integration of sustainable development principles into corporate strategy and decision-making processes relating to investments and design of facilities.</p> <p>(PE is more stringent)</p>
2.2	Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices by joint venture partners, suppliers and contractors, based on risk.	3.1 2.3	Exceeds	<p>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.</p> <p>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 we sell our products.</p>	<p>RGMPs are more stringent regarding requirements to publish a supply chain policy, conduct risk-based monitoring of compliance, and conducting risk-based due diligence on customers.</p> <p>(RGMPs are more stringent)</p>

PRINCIPLE 3

Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
3.1	Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to.	5.1, 5.2	Meets	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.	
3.2	Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people.	7.8	Meets	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.	RGMPs are more prescriptive regarding the requirement to make the resettlement planning framework publicly-available. (RGMPs are more prescriptive)
3.3	Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.	5.3	Meets	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 ¹ .	
3.4	Respect the rights of workers by: not employing child or forced labour; avoiding human trafficking; not assigning hazardous/dangerous work to those under 18; eliminating harassment and discrimination; respecting freedom of association and collective bargaining and; providing a mechanism to address workers grievances.	6.2, 6.3, 6.4, 6.7	Meets	6.2 Preventing discrimination and bullying – We will engage regularly and constructively with our employees and their local representatives and strive to ensure a workplace free from bullying or harassment and unfair discrimination. 6.3 Child and forced labour – We prohibit child labour, forced labour and modern slavery in our operations and in our supply chains.	RGMPs do not explicitly mention hazardous/dangerous work for those under 18 although this is considered part of implementing 6.3. RGMPs are more prescriptive in terms of specifically referencing bullying in the work place and child and forced labour in supply chains. (ICMM PE and RGMPs are prescriptive in different aspects)

1. This does not imply that implementing companies have to become parties to the VPSHRs plenary process

PRINCIPLE 3

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
				<p>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.</p> <p>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.</p>	
3.5	Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits.	6.1	Exceeds	<p>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</p>	<p>RGMPs are more stringent regarding ensuring workers receive fair benefits. (RGMPs are more stringent)</p>
3.6	<p>Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts and; deliver sustainable benefits for Indigenous Peoples.</p> <p>Relevant individual company commitments for the Indigenous Peoples and Mining Position Statement on can be summarised as follows:</p> <ul style="list-style-type: none"> • Engage indigenous peoples to ensure that their rights and interest are respected and that they obtain sustainable benefits through the development of mining projects; • understand and respect their rights and interests regarding a project and its potential impacts; and 	7.2, 7.6, 7.7	Meets	<p>7.2 Understanding communities – We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner. We will be alert to the dangers of causing differentially negative impacts on women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups. We will strive to ensure that the voices of these groups are heard, and that this knowledge is integrated into how we do business.</p> <p>7.6 Indigenous Peoples – We will respect the collective and customary rights, culture and connection to the land of Indigenous Peoples. We will work to obtain their free, prior and informed consent, where significant adverse impacts may occur during exploration, project design, operation and closure, including around the delivery of sustainable benefits.</p>	<p>RGMPs do not specifically require agreeing and documenting engagement and consultation processes with relevant government authorities. (ICMM is more prescriptive)</p>

PRINCIPLE 3

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
	<ul style="list-style-type: none"> agree and document appropriate engagement and consultation processes with potentially impacted indigenous peoples and relevant government authorities² 			<p>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.</p>	
3.7	<p>Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage, and capture the outcomes of engagement and consent processes in agreements.</p> <p>Relevant individual company commitments for the Indigenous Peoples and Mining Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> work to obtain the consent of indigenous communities for new projects (and changes to existing projects) that are located on lands traditionally owned by or under customary use of Indigenous Peoples and are likely to have significant adverse impacts on Indigenous Peoples; collaborate with the responsible authorities to achieve outcomes consistent with the position statement where government is responsible for managing Indigenous Peoples' interests; and address the likelihood that differences of opinion will arise and agree on avenues of recourse³ 	7.2, 7.6, 7.7	Meets	<p>7.6 Indigenous Peoples – We will respect the collective and customary rights, culture and connection to the land of Indigenous Peoples. We will work to obtain their free, prior and informed consent, where significant adverse impacts may occur during exploration, project design, operation and closure, including around the delivery of sustainable benefits.</p> <p>7.2 Understanding communities – We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner. We will be alert to the dangers of causing differentially negative impacts on women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups. We will strive to ensure that the voices of these groups are heard and that this knowledge is integrated into how we do business</p> <p>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.</p>	<p>The RGMPs do not mention documenting the outcomes of engagement and consent processes in agreements and do not address situations where the government is responsible for managing Indigenous Peoples or avenues of recourse.</p> <p>(ICMM is more prescriptive)</p>

2. Benchmark users should refer to the full text of the [Indigenous Peoples and Mining Position Statement](#).

3. Benchmark users should refer to the full text of the [Indigenous Peoples and Mining Position Statement](#).

PRINCIPLE 3

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
3.8	Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.	6.5, 6.6	Meets	<p>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.</p> <p>6.6 Women 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.</p>	<p>RGMPs are more prescriptive regarding reporting on progress and contributing to the socio-economic empowerment of women in communities through supply chain, training and community investment programmes.</p> <p>(RGMPs are more prescriptive)</p>

PRINCIPLE 4

Implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
4.1	<p>Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.</p> <p>Note: These should cover issues such as air, water, biodiversity, noise and vibration, health, safety, human rights, gender, cultural heritage and economic issues. The consultation process should be gender sensitive and inclusive of marginalised and vulnerable groups.</p>	2.4, 7.5, 7.7	Meets	<p>2.4 Impact assessment – We will conduct impact assessments that involve substantive environmental components, socio-economic (including human rights where relevant) and cultural elements, and ensure that these are periodically updated. We will seek to identify and take account of local cumulative impacts. We will ensure that such assessments are accessible to affected communities and include plans to avoid, minimise, mitigate or compensate for significant adverse impacts.</p> <p>7.5 In-migration – We will work with local authorities and community leaders to control or manage the impact of migratory influxes of people attracted by mine development.</p> <p>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</p>	<p>The RGMPs' requirements are equivalent to what is required under PE 4.1.</p> <p>RGMPs include the requirements i) to address cumulative impacts (RGMP 2.4); ii) that mitigation plans are made accessible to affected communities (2.4); and iii) to address in-migration (7.5) (RGMPs are more prescriptive)</p>
4.2	Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas, when operating in, or sourcing from, a conflict-affected or high-risk area.	5.4, 2.3	Exceeds	<p>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.</p> <p>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 we sell our products.</p>	<p>PE 4.2 does not include due diligence on 'entities to which we sell our products', as stated in RGMP 2.3. This requirement is not applicable to ICMM members and who trade bulk commodities and therefore don't have identifiable customers.</p> <p>(RGMPs are more stringent)</p>

PRINCIPLE 4

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
4.3	Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.	2.1, 4.4, 7.5, 7.7, 8.1, 8.5	Meets	<p>2.1 Risk Management – We will maintain systems to identify and prevent or manage both the risks that face our operations and those which our activities may pose to others.</p> <p>4.4 Community health and emergency planning – We will identify and eliminate or minimise significant risks to the health or safety of local people as a direct result of our activities and those of our contractors. We will develop, maintain and test emergency response plans based on national regulations and international best practice guidelines, ensuring the involvement of potentially affected stakeholders.</p> <p>7.5 In-migration – We will work with local authorities and community leaders to control or manage the impact of migratory influxes of people attracted by mine development.</p> <p>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.</p> <p>8.1 Managing environmental impacts – We will implement systems to monitor and manage our impacts on the environment. We will avoid, minimise, mitigate or compensate for significant adverse impacts on the environment relating to our activities.</p> <p>8.5 Noise and dust – We will adopt and implement policies and practices to avoid or mitigate impacts on local communities and the environment arising from noise, dust, blasting and vibration.</p>	<p>The RGMPs' requirements are equivalent to what is required under PE 4.3. (RGMPs are more prescriptive)</p>

PRINCIPLE 4

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
4.4	Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice.	4.4	Meets	4.4 Community health and emergency planning – We will identify and eliminate or minimise significant risks to the health or safety of local people as a direct result of our activities and those of our contractors. We will develop, maintain and test emergency response plans based on national regulations and international best practice guidelines, ensuring the involvement of potentially affected stakeholders.	

PRINCIPLE 5

Pursue continual improvement in health and safety performance with the ultimate goal of zero harm

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
5.1	Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system.	4.1, 4.2	Meets	<p>4.1 Safety – We will be pro-active in preventing fatalities and injuries to our workforce. Regular safety training will be conducted, and personal protective equipment will be supplied at no cost to our workforce. Our objective is zero harm.</p> <p>4.2 Safety management systems – We will implement safety and health management systems based on internationally recognised good practice and focused on continuous improvement of our performance. We will engage regularly on these issues with our workforce and their representatives.</p>	
5.2	Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures	4.1, 4.3	Meets	<p>4.1 Safety – We will be pro-active in preventing fatalities and injuries to our workforce. Regular safety training will be conducted, and personal protective equipment will be supplied at no cost to our workforce. Our objective is zero harm.</p> <p>4.3 Occupational health and wellbeing -We will maintain high standards of occupational health and hygiene and implement risk-based monitoring of the health of our workforce based on occupational exposures. We will promote the physical and mental wellbeing of our workforce.</p>	RGMP references the 'mental wellbeing' of the workforce. (RGMP is more prescriptive)

PRINCIPLE 6

Pursue continual improvement in environmental performance issues, such as water stewardship, energy use and climate change

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
6.1	Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised.	9.4	Meets	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.	RGMPs are more prescriptive regarding beneficial future land-use, preservation of water sources and prevention of acid rock drainage and metal leaching. (RGMPs are more prescriptive)
6.2	<p>Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>Relevant individual company commitments for the Water Stewardship Position Statement can be summarised as follows:</p> <p>1. Apply strong and transparent corporate water governance</p> <ul style="list-style-type: none"> 1.1. Publicly disclose the company's approach to water stewardship. 1.2. Allocate clear responsibilities and accountabilities for water – from board and corporate to site levels. 1.3. Integrate water considerations in business planning 	10.1, 10.2	Partially meets	<p>10.1 Water efficiency – We will use water efficiently and responsibly and in co-operation with authorities and, where possible, other users. When we operate in water stressed areas, we will take proportionate and practicable steps to improve the efficiency of our water use and seek to reduce our water footprint including, where possible, through increased recycling.</p> <p>10.2 Water access and quality – Recognising that access to water is a human right and fundamental ecosystem requirement, we will manage our operations so as to ensure that they do not adversely affect the overall quality of catchment water resources available to other users.</p>	<p>The RGMPs do not address integration into business planning, setting context-relevant targets or reporting using recognised industry metrics</p> <p>(ICMM is more stringent)</p>

PRINCIPLE 6

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
	<p>1.4. Publicly report company water performance, material risks, opportunities and management response using consistent industry metrics and recognised approaches.</p> <p>2. Manage water at operations effectively</p> <p>2.1. Maintain a water balance and understand how it relates to the cumulative impact of other users.</p> <p>2.2. Set context-relevant water targets or objectives for sites with material water-related risks.</p> <p>2.3. Proactively manage water quantity and quality to reduce potential socioenvironmental impacts and realise opportunities.</p> <p>2.4. Ensure all employees have access to clean drinking water, gender appropriate sanitation facilities and hygiene at their workplace.</p> <p>3. Collaborate to achieve responsible and sustainable water use</p> <p>3.1. Identify, evaluate, and respond to catchment-level water-related risks and opportunities.</p> <p>3.2. Identify and engage proactively and inclusively with stakeholders that may influence or be affected by a site's water use and discharge.⁴</p>				

4. Benchmark users should refer to the full text of the [Water Stewardship Position Statement](#).

PRINCIPLE 6

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
6.3	<p>Design, construct, operate, monitor and decommission tailings disposal/storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure.</p> <p>Note: Riverine tailings, freshwater lake and/or shallow marine tailings disposal may be considered only if deemed to be the most environmentally and socially sound alternative, based on an objective and rigorous environmental and social impact assessment of tailings management alternatives. The scope of the assessment should be agreed between the member company and the host government.</p> <p>Relevant individual company commitments for the Tailings Governance Framework Position Statement on can be summarised as follows:</p> <p>1. Accountability, Responsibility and Competency Accountabilities, responsibilities and associated competencies are defined to support appropriate identification and management of Tailings Storage Facility (TSF) risks.</p> <p>2. Planning and Resourcing The financial and human resources needed to support continued TSF management and governance are maintained throughout a facility's life cycle.</p> <p>3. Risk Management Risk management associated with TSFs includes risk identification, an appropriate control regime and the verification of control performance.</p>	8.2	Exceeds	<p>8.2 Tailings and waste management – We will design, build, manage and decommission tailings storage and heap-leach facilities and large-scale water infrastructure using 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.</p>	<p>RGMP 8.2 applies to heap-leach facilities and large water infrastructure in addition to tailings facilities. It also includes a prohibition on use of riverine or shallow submarine tailings.</p> <p>(RGMPs are more stringent)</p>

PRINCIPLE 6

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
	<p>4. Change Management Risks associated with potential changes are assessed, controlled and communicated to avoid inadvertently compromising TSF integrity.</p> <p>5. Emergency Preparedness and Response Processes are in place to recognise and respond to impending failure of TSFs and mitigate the potential impacts arising from a potentially catastrophic failure.</p> <p>6. Review and Assurance Internal and external review and assurance processes are in place so that controls for TSF risks can be comprehensively assessed and continually improved.⁵</p>				

5. Benchmark users should refer to the full text of the [Tailings Governance Framework Position Statement](#)

PRINCIPLE 6

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
6.4	<p>Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment.</p> <p>Relevant individual company commitments for the Mercury Risk Management Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Not open any mines designed to produce mercury as the primary product Apply material stewardship to promote the responsible management of mercury produced from members operations including that which naturally occurs in our products. Identify and quantify point source mercury air emissions from our operations and minimise them through the application of cost effective best available technology, using a risk-based approach. Report significant point source mercury air emissions from our operations consistent with GRI.⁶ 	4.4, 8.1, 8.3, 8.4, 8.5	Meets	<p>4.4 Community health and emergency planning – We will identify and eliminate or minimise significant risks to the health or safety of local people as a direct result of our activities and those of our contractors. We will develop, maintain and test emergency response plans based on national regulations and international best practice guidelines, ensuring the involvement of potentially affected stakeholders.</p> <p>8.1 Managing environmental impacts – We will implement systems to monitor and manage our impacts on the environment. We will avoid, minimise, mitigate or compensate for significant adverse impacts on the environment relating to our activities.</p> <p>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.</p> <p>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.</p> <p>8.5 Noise and dust – We will adopt and implement policies and practices to avoid or mitigate impacts on local communities and the environment arising from noise, dust, blasting and vibration.</p>	<p>RGMPs do not require reporting on significant point source mercury air emissions. (ICMM is more prescriptive)</p>

6. Benchmark users should refer to the full text of the [Mercury Risk Management Position Statement](#)

PRINCIPLE 6

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
6.5	<p>Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO₂ equivalent (GHG) emissions.</p> <p>Relevant individual company commitments for the Climate Change Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Implement governance, engagement and disclosure processes to ensure climate change risks and opportunities are considered in business decision-making. • Advance operational level adaptation and mitigation solutions, taking into consideration local opportunities and challenges. • Engage with host communities on our shared climate change risks and opportunities and help host communities understand how they can adapt to the physical impact of climate change. • Disclose Scope 1 and 2 greenhouse gas emissions on an annual basis and set emissions reduction targets at a corporate level.⁷ 	10.3, 10.4	Partially meets	<p>10.3 Combating climate change – We support the objectives of global climate accords through avoidance, reduction or mitigation of carbon emissions. Where relevant, we will work to enhance the ability of our operations and nearby communities to be resilient to the effects of climate change.</p> <p>10.4 Energy efficiency and reporting – We will work to improve the efficiency of our energy use and to minimise our greenhouse gas emissions intensity. We will measure and report on our CO₂ equivalent emissions in line with accepted reporting standards.</p>	<p>RGMPs do not require incorporation of climate change into business decision-making and do not require targets at the corporate level.</p> <p>(ICMM is more stringent)</p>

7. Benchmark users should refer to the full text of the [Climate Change Position Statement](#)

PRINCIPLE 7

Contribute to the conservation of biodiversity and integrated approaches to land-use planning

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
7.1	<p>Neither explore nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated.</p> <p>Relevant individual company commitments for the Mining and Protected Areas Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Respect legally designated protected areas and ensure that any new operations or changes to existing operations are not incompatible with the value for which they were designated. • Not explore or mine in World Heritage properties and ensure operations adjacent to World Heritage properties are not incompatible with the outstanding universal value for which these properties are listed⁸ 	9.2	Partially meets	<p>9.2 World Heritage Sites – We will not explore or seek to develop new mining operations in an area designated as a World Heritage Site.</p>	<p>RGMPs do not mention protected areas. (ICMM PE is more stringent)</p>

8. Benchmark users should refer to the full text of the [Mining and Protected Areas Position Statement](#)

PRINCIPLE 7

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
7.2	<p>Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no net loss of biodiversity.</p> <p>Note: The ambition of no net loss applies to new projects and major expansions to existing projects that impact biodiversity and ecosystem services</p> <p>Relevant individual company commitments for the Mining and Protected Areas Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> To ensure that potential adverse impacts on biodiversity from new operations or changes to existing operations are adequately addressed throughout the project cycle and that the mitigation hierarchy is applied⁹ 	9.1, 9.3	Meets	<p>9.1 Biodiversity – We will implement biodiversity management plans. At a minimum, we will seek to ensure that there is no net loss of critical habitat. Where opportunities arise to do so, we will work with others to produce a net gain for biodiversity. We will incorporate both scientific and traditional knowledge in designing adaptation strategies in ecosystem management and environmental assessment.</p> <p>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.</p>	<p>RGMPs include a suggestion to look for opportunities to produce a net gain. RGMPs are also more prescriptive regarding deforestation, the incorporation of scientific and traditional knowledge in ecosystem management.</p> <p>(RGMPs are more prescriptive)</p>

9. Benchmark users should refer to the full text of the [Mining and Protected Areas Position Statement](#)

PRINCIPLE 8

Facilitate and support the knowledge-base and systems for responsible design, use, reuse, recycling and disposal of products containing metals and minerals

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
8.1	In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials.	10.1, 10.4	Partially meets	<p>10.1 Water efficiency – We will use water efficiently and responsibly and in co-operation with authorities and, where possible, other users. When we operate in water stressed areas, we will take proportionate and practicable steps to improve the efficiency of our water use and seek to reduce our water footprint including, where possible, through increased recycling.</p> <p>10.4 Energy efficiency and reporting – We will work to improve the efficiency of our energy use and to minimise our greenhouse gas emissions intensity. We will measure and report on our CO₂ equivalent emissions in line with accepted reporting standards.</p>	RGMPs do not include requirements around recycling except for water. (ICMM PE is more stringent)
8.2	Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate.	8.3	Meets	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.	RGMP is less prescriptive in terms of UNGHS and communication but is considered equivalent. (ICMM PE is more prescriptive)

PRINCIPLE 9

Pursue continual improvement in social performance and contribute to the social, economic and institutional development of host countries and communities

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
9.1	<p>Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate.</p> <p>Relevant individual company commitments for the Mining Partnerships for Development Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> For major investments: (i) develop an understanding of the socio-economic contribution of the project, including barriers that might weaken this contribution; and (ii) actively support partnerships with other stakeholder groups to realise the project's potential socio-economic contribution. Review the success of their partnerships at suitable intervals and adapt to ensure continued contribution to the goal of enhancing the socio-economic contribution of mining.¹⁰ 	2.4, 6.6, 7.1, 7.3	Meets	<p>2.4 Impact assessment – We will conduct impact assessments that involve substantive environmental components, socio-economic (including human rights where relevant) and cultural elements, and ensure that these are periodically updated. We will seek to identify and take account of local cumulative impacts. We will ensure that such assessments are accessible to affected communities and include plans to avoid, minimise, mitigate or compensate¹¹ for significant adverse impacts.</p> <p>6.6 Women 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.</p> <p>7.1 Community consultation – We will consult regularly and in good faith with the communities associated with our operations on matters of interest to them, and will take account of their perspectives and concerns.</p> <p>7.3 Creating local benefits – We will ensure that the communities associated with our operations are offered meaningful opportunities to benefit from our presence, including through access to jobs and training, and procurement opportunities for local businesses and social investment.</p>	

10. Benchmark users should refer to the full text of the Mining Partnerships for Development Position Statement

11. Implementing companies are expected to adopt a mitigation hierarchy approach whereby they seek to anticipate and avoid adverse impacts. Where avoidance is not possible, they should seek to minimise or mitigate such impacts. Where residual impacts remain, companies should compensate/offset for significant risks or impacts to workers, affected communities and the environment.

PRINCIPLE 9

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
9.2	Enable access by local enterprises to procurement and contracting opportunities across the project lifecycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.	3.2, 7.3	Meets	<p>3.2 Local procurement – We will promote access for local businesses to procurement and contracting opportunities generated by our operations and, where appropriate, provide capacity building support to help them improve their capabilities as suppliers.</p> <p>7.3 Creating local benefits – We will ensure that the communities associated with our operations are offered meaningful opportunities to benefit from our presence, including through access to jobs and training, and procurement opportunities for local businesses and social investment.</p>	
9.3	Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities.	2.2, 2.5, 7.4	Exceeds	<p>2.2 Stakeholder engagement – We will listen to and engage with stakeholders in order to understand better their interests and concerns and integrate this knowledge into how we do business.</p> <p>2.5 Resolving grievances – We will establish fair, accessible, effective and timely mechanisms through which complaints and grievances related to our activities can be raised and resolved and remedies implemented. Those raising such grievances in good faith will not face discrimination or retaliation as a result of raising their concerns.</p> <p>7.4 Seeking community support – We will seek to obtain and sustain the broad-based support of communities affected by our activities.</p>	<p>RGMP 7.4 is more stringent in requiring broad-based support of communities.</p> <p>(RGMPs are more stringent)</p>

PRINCIPLE 9

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
9.4	<p>Collaborate with government, where appropriate, to support improvements in environmental and social practices of local artisanal and small-scale mining (ASM)</p> <hr/> <p>Relevant individual company commitments for the Mercury Risk Management Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Participate in government-led partnerships to help the ASM sector near member operations transfer to low or no mercury technologies to both improve productivity and reduce negative health impacts¹² 	3.3	Exceeds	<p>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.</p>	<p>RGMPs require companies to support market access for legitimate ASM. (RGMPs are more stringent)</p>

12. Benchmark users should refer to the full text of the [Mercury Risk Management Position Statement](#)

PRINCIPLE 10

Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner. Effectively report and independently verify progress and performance

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
10.1	Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner.	2.2	Meets	2.2 Stakeholder engagement – We will listen to and engage with stakeholders in order to understand better their interests and concerns and integrate this knowledge in to how we do business.	
10.2	<p>Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project.</p> <p>Relevant individual company commitments for the Transparency of Mineral Revenues Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Include a clear endorsement of efforts at the international level to enhance the transparency of mineral revenues, including EITI and submit a completed international-level self-assessment form to the EITI Secretariat. Engage constructively in countries that are committed to implementing EITI. Compile information on all material payments by country and by project at the appropriate levels of government. In EITI implementing countries, this should be provided to the EITI body assigned by government according to the agreed national template. Material payments by companies are expected to have been independently audited. Support the public disclosure (ie publication) of material payments by country and by project. For EITI, this should be in line with the implementation approach adopted in-country.¹³ 	1.5	Meets	<p>1.5 Transparency – We will publish our tax, royalty and other payments to governments annually by 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.</p>	<p>RGMPs do not detail specific EITI commitments. (ICMM PE is more prescriptive)</p>

13. Benchmark users should refer to the full text of the [Transparency of Mineral Revenues Position Statement](#)

PRINCIPLE 10

	ICMM Mining Principles	Relevant Responsible Gold Mining Principles	Equivalency rating	Full text of relevant Responsible Gold Mining Principles	Equivalency notes
10.3	<p>Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards.</p> <p>Relevant individual company commitments for the Mining Partnerships for Development Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Provide an overview of their work on [socio-economic development] partnerships, as appropriate, in their annual external reporting and communications.¹⁴ 	1.7	Partially meets	<p>1.7 Accountabilities and reporting – We will assign accountability for our sustainability performance at the Board and/or Executive Committee level. We will report publicly each year on our implementation of the Responsible Gold Mining Principles.</p> <p>Assurance Framework for RGMPs: Implementing companies are required to publicly disclose their conformance with the RGMPs in the form of an Annual Report on their implementation of the RGMPs.</p>	<p>RGMPs require reporting on sustainability performance in the RGMP Report, although this may not include performance data which would be required in reporting against GRI Standards.</p> <p>(ICMM PE is more stringent)</p>
10.4	Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and verifying membership requirements.	Assurance Framework	Meets	<p>Assurance Framework for RGMPs: The RGMPs require implementing companies to:</p> <ol style="list-style-type: none"> 1. Make a public commitment to align with the RGMPs 2. Develop internal systems, processes and performance that conform with the Principles 3. Report publicly on the status of conformance with the Principles 4. Obtain independent assurance on their conformance with the Principles. The assurance will be conducted at both mine site and corporate levels. 	RGMP requires independent assurance of conformance with the Principles, which is equivalent to ICMM's assurance on 'sustainability performance'.

RGMPs 1.2 and 1.6 are not included in the equivalency analysis for any of the PEs above because they are not covered or not needed in order to meet the PEs.

14. Benchmark users should refer to the full text of the [Mining Partnerships for Development Position Statement](#)

World Gold Council

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We develop gold-backed solutions, services and products, based on authoritative market insight and we work with a range of partners to put our ideas into action. As a result, we create structural shifts in demand for gold across key market sectors. We provide insights into the international gold markets, helping people to understand the wealth preservation qualities of gold and its role in meeting the social and environmental needs of society.

The membership of the World Gold Council includes the world's leading and most forward thinking gold mining companies.

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