

MCEP Supporting Document 1: First version of the MCEP Audit Protocol, 2004

Draft Audit Protocol

N.B.: This audit protocol is based on the Principles and Criteria (P&C) developed by the MCEP Working Group. Each item of the protocol can be traced back to the P&C by referring to the number in brackets; i.e. "P #1" means that the item corresponds to principle number 1 in the P&C. The wording of the P&C has been preserved in the protocol to the extent possible in the context of the intended use of this document.

I. Economic Section

1. Implement and maintain ethical business practices and sound systems of corporate governance. [P #1]

- a) Develop and implement company statements of ethical business principles and practices that management is committed to enforcing;
- i. The MSO's corporate entity has ethical business and corporate governance policies endorsed and reviewed by the Board of Directors.

1	<p>Determine whether the MSO has an ethical business policy and that it has been reviewed and endorsed by the Board of Directors.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - ethical business policy (where is it recorded/displayed/publicly available?) - committees under the board of directors and/or processes designed for management of economic, environmental and social risks and opportunities - percentage of the board of directors that are independent, non-executive - minutes of board meeting making reference to ethics and corporate governance
2	<p>Determine whether the MSO has a corporate governance policy and, if so, what the policy consists of and whether it has been reviewed and endorsed by the Board of Directors.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - governance policy - guidelines for implementation - endorsement by Board - minutes of Board meetings with reference to governance - independent audits/reviews against statutory requirements under corporations act - internally or externally developed codes, charters, etc.
3	<p>Determine the mechanisms by which the MSO communicates its policies in this area on site.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - guidelines for implementation available, relevance to MSO clearly explained - employee communications and regularity of updates - help desks, intranet, links to performance appraisals, certification of systems
4	<p>Determine what (if any) change management procedures are in place at the site level, in respect to the ethical business and corporate governance policies, and how these are communicated to employees.</p>

- ii. The MSO has taken reasonable steps to ensure that employees and contractors conform with these policies on site.

1	Determine the degree to which the ethical business policy has been implemented. Indicators: - interviews with employees and contractors to determine their knowledge of policy and how to report breaches of it - process to address breaches of policy
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- b) Implement policies and practices that seek to prevent bribery and corruption;
i. The MSO does not offer, pay or accept bribes.

1	Determine whether the MSO has policies and practices that seek to prevent bribery and corruption. Indicators: - policies, procedures / management systems, compliance mechanisms
2	Assess whether or not the MSO offers, pays or accepts bribes.

- ii. The MSO does not use facilitation payments, except when it can be shown that this is a necessary condition for doing business in the area where the MSO is located. When payments are made, they are clearly documented and accounted for.

1	Determine whether the MSO makes facilitation payments. If so, determine how these were requested.
2	Determine how facilitation payments are documented and to what degree they accurately reflect the transactions made.

- iii. The MSO publicly discloses payments made to or received from any government, government-linked entity, private security force or other stakeholder group.

1	Determine whether the MSO has procedures in place to ensure that payments – in cash or in kind – made to or received by government, government linked entities, private security forces, political parties, charities etc are publicly disclosed and what that disclosure entails. Indicators: - reporting of payments - reporting of receipt of donations
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- c) Comply with or exceed the requirements of host country laws and regulations;

- i. The MSO complies with or exceeds all national, state and local laws and regulations.

1	Determine how the MSO identifies the legal and other requirements, including new and amended requirements of the host country at a national, state and local level. Determine who is responsible for this activity. Determine how accurately the requirements have been identified.
2	Determine how legal and other requirements are communicated to personnel. Determine to whom the requirements are communicated.

3	Determine whether systems are in place to ensure that the host country laws and regulations are complied with and reflected in procedures, plans, monitoring, record keeping and reporting (such as operational procedures, safety case management plans, environmental management plans, community relations plans).
4	Determine the extent to which legal compliance is achieved. Indicators: - compliance register - records of communications with government - incidents and fines for non-compliance
5	Determine whether and how the implementation of regulatory requirements and commitments is assessed to ensure compliance.

- ii. Where legal non-compliance has occurred, the MSO responds, monitors the issue and verifies that it is, or is being, resolved expeditiously. The response includes provisions to prevent the non-compliance recurring.

1	Where a non-compliance has occurred, determine whether the MSO has a system in place to respond to the issue (responsibility/ resource allocation). Determine the timeframe within which non-compliance issues are resolved.
2	Determine whether the system for responding to non-compliances includes provisions to prevent a recurrence of the non compliance.

- iii. Conflicts between laws, regulations and MCEP Principles and Criteria are evaluated on a case-by-case basis with the involvement of affected parties.

1	Determine whether there is a system in place to ensure that conflicts between host country laws and regulations and MCEP Principles and Criteria are evaluated on a case by case basis with the involvement of affected parties. Indicators: - documented assessment
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2. Uphold fundamental human rights and respect cultures, customs and values in dealings with employees and contractors. [P #3]

- a) Ensure fair remuneration and work conditions for all employees and do not use forced, compulsory or child labour;
i. The MSO does not use forced labour.

1	Determine whether the MSO has systems in place to ensure that it does not use forced or compulsory labour practices. If so, determine what these systems are and what the resultant outcomes are. Indicators: - policies visibly stated and applied - monitoring systems and results of monitoring - standards or guidelines developed and implemented - confidential complaints mechanism that employees can access
2	Determine whether the implementation of the systems to protect against forced labour is audited.

- ii. The MSO does not exploit child labour.

1	Determine whether the MSO has systems in place to ensure that it does not exploit child labour. Determine what those systems are and what the resultant outcomes are. Indicators: - policies visibly stated and applied - monitoring systems and results of monitoring - standards or guidelines developed and implemented
2	Determine whether the implementation of the systems to protect against child labour exploitation is audited.
3	Determine whether the MSO has systems in place to avoid suppliers who exploit child labour.

- iii. The MSO provides wages and benefits at least commensurate with similar operations in the same country.

1	Determine whether the MSO has systems in place to ensure that wages and benefits of the MSO and its contractors and suppliers are commensurate with similar operations in the country of operation. Determine how the MSO defines “commensurate with” and “similar operations” in the design of these systems. Indicators: - documented research on the part of the company into the level of wages and benefits paid by similar operations in the same country - salaries and benefits of workers compared to those levels
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- iv. The MSO has appropriate training systems in place that enable employees to upgrade their skills and seek advancement within the MSO.

1	Determine whether the MSO offers training opportunities to employees for upgrading skills. Determine what these opportunities are. Indicators: - competency based program for each position - training needs analysis program
2	Review training records to determine whether or not upgrade training is accessible to employees.
3	Succession plan for career development

- b) Provide for the constructive engagement of employees and contractors on matters of mutual concern;
- i. The MSO respects employees’ right to choose whether or not they wish to be represented collectively. The MSO proactively engages with employees to determine mutually acceptable employment arrangements.

1	<p>Determine whether the MSO has systems in place that respect the right of employees to choose whether or not they wish to be represented collectively. Determine whether employees are aware of this right and whether or not the MSO respects it.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - percentage of employees represented by independent trade union organisations or other employee representatives - confidential random interviews with employees in the absence of management to ascertain: <ul style="list-style-type: none"> * whether they are aware of their right to join a union and bargain collectively * what they understand to be company policy and practice with respect to that right * whether they feel free to exercise their rights
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- ii. The MSO implements fair treatment and dispute resolution systems that enable complaints to be raised (collectively or individually) and dealt with fairly. These systems also protect employees from arbitrary termination.

1	<p>Determine whether the MSO has effective dispute resolution systems in place that enable a complaint to be raised and addressed and that these prevent retribution against those raising the complaint.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - interviews with employees who exercise supervisory functions to ascertain whether they have received training/advice on fair treatment of those they supervise - evidence of a fair treatment and dispute resolution system for dealing with complaints by employees - interviews with employees indicating they have been informed of the existence of this system and that they are able to make complaints without fear of retribution, and that their complaints are addressed
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- c) Implement policies and practices designed to eliminate harassment and unfair discrimination in all aspects of the MSO's activities;
- i. The MSO provides equal pay and remuneration (pay and benefits) for work of equal value.

1	<p>Determine whether the MSO has effective systems in place that ensure equal pay for work of equal value.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - no differences in remuneration (pay and benefits) to people with similar skills but of different cultures, backgrounds, race, colour, sex, language, religion, political or other opinion, nationality or social origin, property, birth or other status, disability, sexual orientation, or union membership etc., performing work of equal value
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- ii. The MSO provides for equality of opportunity and non-discriminatory treatment of all employees in respect to employment and occupation.

1	<p>Determine whether the MSO has effective policies and systems in place that provide for equality of opportunity and non-discriminatory treatment of all employees in respect to employment and occupation.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - interviews with employees indicating equal opportunities for employment and promotion for people with similar qualifications and experience (except where there are overriding policies/laws in the country of operation mandating affirmative action etc) - composition of senior management and corporate governance bodies, as well as workforce, including female/male ratio and other indicators of diversity - provision of maternity leave and special protection to women during pregnancy in types of work which may be harmful to their health or that of their unborn child/ren - provision of flexible work arrangements to female employees upon return from maternity leave - annual company public reports to the Equal Opportunity for Women in the Workplace Agency
2	<p>Determine whether the MSO has developed and implements effective anti harassment policies at all workplaces.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - presence of a company sexual harassment and fair treatment policy which incorporates all forms of discrimination - interviews with employees indicating that they have been informed of anti-harassment policies - apparent absence of offensive or discriminatory literature, photographs etc. in the workplace - reported cases of sexual harassment or other forms of harassment - anti harassment trained officers at MSO

3. Seek continual improvement of health and safety performance. [P #5]

- a) Implement a management system focused on continual improvement of all aspects of operations that could have a significant impact on the health and safety of employees, contractors and the communities where the MSO operates;
- i. The MSO engages with stakeholders, including those who may be exposed to potential risks, in identifying, assessing and managing significant risks through all phases of the operation. [P #4.a)i.]

1	Determine whether the MSO has effective systems in place to ensure that relevant stakeholders are identified and engaged in the process of risk management at all phases of the operation.
2	Determine whether employees, contractors and other stakeholders with the relevant knowledge and experience are involved in risk management processes for all activities.
3	Determine what social, cultural, health, safety, environmental and economic risks the risk management processes considers and whether stakeholders are satisfied with the processes.
4	Determine whether employees have been trained in Risk Assessment techniques

- ii. The MSO has a management system to protect the safety and health of its employees, contractors, their families, communities and visitors to the site from impacts associated with the activities of the operation. [P #5.b)i]

1	<p>Determine whether the MSO has developed and implemented systems to measure and manage the impacts associated with its operations on the health and safety of its employees, contractors and the local community, and continually improve its performance.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - responsibilities identified and assigned - interviews with managers, employees and contractors indicating they understand their responsibilities - documented safety management system - internal and /or external audits of SMS performance - systems and procedures for inspecting and maintaining lifting gear, machine guards, welding, high pressure testing, electrical work, clearance to work, confined space entry, etc. - policies on smoking, noise, occupational hygiene, sanitation & hygiene, traffic management, excavation & digging, lasers, fibrous materials, radioactive & explosive materials, manual handling, pit wall stability, change management & communication, etc.
2	<p>Assess the effectiveness of the systems by determining the mining operation's impacts on the health and safety of its employees, contractors and the local community.</p>
3	<p>Assess whether, and what types of, health and safety statistics are collected and reported for the site.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - accident rates, FAI, MAI - near miss incidents- lost time injury frequency rates - number of fatalities
4	<p>Determine whether there is a system in place to ensure that travel security and medical advice is made available to those employees who travel on MSO business. Determine what that advice consists of.</p>
5	<p>Determine the percentage of site personnel who are subject to annual medical screening. Place this in the context of the nature and scale of operations.</p>
6	<p>Determine whether occupational health and hygiene assessments are undertaken to establish baseline conditions, and whether ongoing monitoring is conducted so as to establish a basis for protecting the health of employees and contractors.</p>
7	<p>Determine employees' work schedules.</p>
8	<p>Determine whether and, if so, how and when safety systems undergo inspections and audits, internal and/or external.</p>
9	<p>Determine the strategic capacity of the MSO for improved management of health and safety issues.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - health & safety addressed in annual planning and strategic MSO planning cycle - MSO involvement with external H&S activities and links with external organizations/H&S committees - percentage of budget devoted to R&D on health and safety - profiles of personnel whose responsibilities include improving health and safety management

10	<p>Determine how the MSO has addressed fatigue management.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - levels of fatigue determined as acceptable - design of working hours so as to avoid unacceptable levels of fatigue - means of ensuring the scientific/medical validity of acceptable fatigue level - assessment of the various rosters of the MSO for fatigue impact - provision for employees to alter working hours to meet family responsibilities
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iii. The MSO's risk management system takes account of health and safety threats and opportunities throughout the mine life cycle, and is regularly reviewed and updated. [P #4.b)i]

1	<p>Determine whether the MSO has documented risk identification, assessment and management processes for all significant health and safety risks, both ordinary hazard management and management of catastrophic risks, for: exploration, new projects and major changes to existing projects (physical or operational), current operations, acquisitions, divestments, mergers, decommissioning, closure, rehabilitation.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - risk policy/standards/guidelines for implementation - risk register, by whom developed and managed, and when last updated - risk assessments / methods used to hierarchise risks according to level of severity and probability - documentation of risk management decisions - tracking of actions resulting from the risk reviews (e.g. time frames set, responsibilities assigned, completion documented)
2	Determine at what level of MSO management the identified risks are evaluated, according to their perceived significance.
3	<p>Determine how the risk management system is maintained.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - responsibilities clearly assigned and understood
4	Determine whether the risk management system is audited and how its effectiveness is reviewed.
5	Determine whether the management system, operational controls and employee training are updated to reflect the outcomes of periodic reviews.

iv. The MSO has implemented appropriate controls according to level of risk. [P #5.b)iv.]

1	Determine whether health hazards have been identified during risk assessments and whether appropriate controls have been implemented. Verify against the risk register (or equivalent).
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2	Determine whether all employees and contractors have been made aware of the need for, and availability of, first aid equipment, and how many have been trained in its use. Indicators: - training records - employee handbooks - interviews with employees and contracts to confirm their awareness and use of first aid equipment
3	Determine what types of personal protective equipment requirements have been identified, and how this equipment is made available and maintained. Indicators: - use of safety equipment (record what is used)
4	Determine whether areas where personnel protective equipment (PPE) is required are sign-posted. Determine whether employees, contractors and visitors receive induction training and PPE, and comply with requirements.

- b) Implement regular health surveillance and risk based monitoring of employees; [P #5.d)]
- i. Health surveillance and monitoring are used for the purpose of providing early warning of health problems, identifying risks and assisting in the development of controls to reduce health and safety risks.

1	Determine whether proactive and relevant medical surveillance programs have been implemented and are effective. Indicators: - review of occupations that could have occupational exposure(s) - documented monitoring program for “at risk occupations” - medical screening before, during and after employment, depending on occupational exposure
2	Determine whether, where potential health and safety problems have been identified, controls have been developed to reduce health and safety risks. Determine to what level they have been reduced.
3	Determine whether and, if so, how the health of employees is monitored, especially in areas identified as key risks.

- ii. The MSO has adopted recognised standards for occupational health and exposure to workplace agents, and monitors and reports against those standards.

1	Determine whether the MSO has effectively identified and adopted recognised standards for occupational health and exposure to the workplace agents available at the site.
2	Determine whether the MSO monitors and reports against the identified exposure standards.

- iii. The MSO workforce is advised of the results of occupational health monitoring.

1	Determine whether the MSO communicates with its workforce in respect to the results of occupational health monitoring and their correlation with health risks. Determine whether all relevant employees have this information.
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2	<p>Determine whether the mine proactively advises employees of potential high risk occupational areas and suitable controls.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - education program
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- iv. Employees who have been exposed to significant occupational health risk are monitored, with their consent, beyond the term of their employment or the life of the mine.

1	<p>Determine whether employees who have been exposed to significant occupational health risks are offered monitoring beyond the term of their employment and, if so, what that monitoring consists of.</p>
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- v. Individual medical records are kept confidential with the employee and only authorised persons having full access.

1	<p>Determine whether individual medical records are maintained. Where records are maintained then determine whether these are kept confidential and whether employees have full access rights.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - documentation of procedures for maintaining medical records and ensuring confidentiality
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- c) Take all practical and reasonable measures to eliminate workplace fatalities, injuries and work-related diseases among employees and contractors; [P #5.b)]
- i. The MSO has an active Fitness for Work program, or equivalent, that addresses both the potential for work to impact employee health and safety, and the potential for worker health to impact workplace safety. [P #5.b)ii]

1	<p>Determine whether and, if so, when employees and contractors undergo fitness for work assessments.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - frequency and timing of health checks (e.g. annually and/or at commencement of employment, significant job changes, and termination of employment) - readiness for work tests – e.g. fatigue, motor skills and drug and alcohol - consequences of failing tests - how and by whom tests are formulated and results checked (e.g. independent accredited laboratories / sources)
2	<p>Determine whether the MSO has an effective Fitness for Work program that covers major health factors such as physical fitness, healthy lifestyle, substance abuse, fatigue, stress, balancing work and family commitments, environmental exposure, risks to work fitness arising from work design and work systems, etc. Determine whether it also has a program that promotes a healthy lifestyle outside of normal working hours, and whether employees and contractors are aware of the program</p>
3	<p>Determine whether health checks, readiness for work tests and the Fitness for Work program have been formulated with the involvement and consent of the majority of employees.</p>

- ii. Employees and contractors have access to adequate medical and first aid services, appropriate to the location and nature of the MSO. [P #5.b)v.]

1	Determine the level of access to medical and occupational health services that employees and contractors have.
2	Determine what these medical and first aid services and facilities are.

iii. The MSO ensures that employees and contractors are provided with effective supervision. [P #5.b)vi.]

1	Determine what level of supervision employees and contractors are provided with. Indicators: - interviews with site employees and contractors
2	Determine how supervisors are trained. Indicators: - supervisor training program - supervisor accreditation scheme - numbers of supervisors being trained

iv. The MSO sets targets with timelines for key health and safety issues that demonstrate a commitment to reduce workplace incidents. [P #5.b)vii.]

1	Establish how the MSO sets key health and safety KPIs and targets to improve performance.
2	Determine whether workplace incidents (including accidents and near misses) are investigated, actions completed and findings communicated to employees .
3	Determine whether the MSO tracks and communicates to employees and contractors key health and safety statistics and sets targets to improve performance.

d) Provide all employees with health and safety training, and require employees of contractors to have undergone such training; [P # 5.c)]

i. Employees and contractors only undertake work that they have the training, skills, knowledge and experience to undertake safely.

1	Determine whether a training needs analysis has been undertaken of all health and safety training requirements for employees and contractors.
2	Determine whether the identified health and safety training has been provided or is scheduled. If the latter, determine when it has been scheduled for. Indicators: - health and safety training records for employees and contractors, and dates thereof
3	Determine whether all work is performed only by employees or contractors with appropriate training.

ii. Health and safety training is certified under local or national vocational education and training networks, where they exist.

1	Determine whether a recognised vocational training scheme exists. If so, determine whether health and safety training is certified under it.
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e) Develop, maintain and test effective emergency response procedures in collaboration with potentially affected parties; [P #4.d)]

- i. The MSO works with stakeholders to identify emergency scenarios and develop emergency response strategies and capabilities designed to protect communities, workers and the environment.

1	Determine whether the MSO has established systems to identify potential emergency situations/scenarios and develop appropriate emergency response strategies. Ascertain the extent to which the risks on the risk register are addressed.
2	Determine what the identified emergency scenarios are and on what likelihood of occurrence they are based, and how they address initiating events and potential escalation.
3	Determine whether stakeholder concerns (perceptions and outrage) have been assessed and considered in these scenarios and strategies.
4	Determine how the emergency response systems are documented and communicated, and to which personnel and/or local communities. Determine whether senior management are familiar with the systems.
5	Determine what types of training have been provided to personnel in respect to emergency response.
6	Determine whether the systems have identified the emergency response equipment and other resources required for the scenarios and whether these have been provided.
7	Determine what types of testing of emergency response procedures have been undertaken, and how often.

- f) Rehabilitate and reintegrate employees into operations following illness or injury, where feasible. [P #5.e)]
- i. The MSO has or follows appropriate procedures for the treatment of, and compensation for, people who suffer injuries and illness that result from workplace incidents, exposures or conditions. The MSO has procedures for the reintegration of staff into their operations.

1	Determine whether the MSO has developed and implemented an effective rehabilitation program for employees and contractors affected by work-related injuries, exposures or illness.
2	Determine whether and, if so, at what point, following a work-related injury or illness, employees and contractors are encouraged to return to work, or to perform alternative duties if medically approved and appropriate to do so.
3	Determine whether the MSO rehabilitation program provides for the maintenance of records for the documentation of treatment and compensation provided in compliance with privacy laws.

II. Environmental Section

1. Seek continual improvement of environmental performance. [P #6]

- a) Assess the positive and negative, the direct and indirect, and the cumulative environmental impacts of new projects – from exploration through closure;
- i. Assessment of environmental impacts, including cumulative impacts, and collection of comprehensive and appropriate baseline data is completed before commencement of new site-disturbing operations for the entire project life, including closure;

1	Determine whether the MSO undertakes environmental impact assessments, during the planning and design phase of new developments or major changes to existing developments, that identify and evaluate potential adverse impacts of existing, and new, processes, products and services.
2	Determine what type of baseline data is collected during environmental impact assessments and is available prior to the commencement of new site disturbing activities. Indicators: - comprehensiveness of EIA in terms of environmental aspects and impacts - environmental risk register
3	Determine whether or not an independent third party performed the EIA.

- ii. The MSO regularly monitors its activities, evaluates their environmental impacts, and reports the results.

1	Determine whether the MSO effectively monitors the accuracy of impact assessment predictions and responds accordingly.
2	Determine whether the MSO has identified the sources of major environmental impacts and emissions from the site and their risk to the environment, and assess what types of controls / plans have been implemented to address these impacts. Indicators: - greenhouse gases, ozone depleting substances, and other emissions from both stationary and mobile sources - impacts from fugitive emissions such as dust - total amount of waste and methods of disposal / treatment, including mineral waste (waste rock, tailings, metallurgical slags and residues) and non-mineral waste - total water use - significant discharges to water by type - impacts on aquatic ecosystems - total materials use - direct and indirect energy use: sources, amount - methods to address incidents e.g. bioremediation - provision for impacts of storm events - methods to address erosion - etc.
3	Assess the level of general awareness and understanding across all levels of the organisation regarding regional and site specific environmental issues.

4	Determine what the environmental monitoring program measures and how results are reported to senior management. Assess the effectiveness of this system and the accessibility of environmental monitoring information to various parts of the organisation. Indicators: - reporting of major impacts and emissions - reporting of incidents such as spills of chemicals, oils and fuels: size of spill and impacts on surrounding environment
5	Determine the extent to which monitoring and reporting of environmental aspects is independently verified.

- iii. The MSO engages with stakeholders, including those who may be exposed to potential risks, in identifying, assessing and managing significant risks through all phases of the operation. [P #4.a)i]

1	Determine whether the MSO has effective systems in place to ensure that relevant stakeholders are identified and engaged in the process of risk assessment at all phases of the operation.
2	Determine whether employees, contractors and other stakeholders with the relevant knowledge and experience are involved in risk management processes for all activities. Determine how and to what extent their knowledge is taken into account.

- b) Implement an environmental management system focused on continual improvement to review, prevent, or mitigate adverse environmental impacts; [P #6.b)]
i. The MSO implements an environmental management system (EMS) consistent with an internationally recognised EMS standard as well as local and/or national standards.

1	Determine whether the MSO has developed and implemented an EMS consistent with an international standard as well as local and/or national standards.
2	Determine the scope of the EMS (part of the MSO activities, all of the MSO activities, MSO products and services, suppliers and service providers, JV partners)
3	Determine the quantified targets established in the EMS.
4	Assess the effectiveness of the methodology used to ensure that the EMS conforms to the relevant standard
5	Determine the effectiveness of the EMS in achieving continual improvement at the site.
6	Determine how the EMS is communicated to employees and stakeholders.

- ii. The effectiveness of the EMS is regularly reviewed to demonstrate continual improvement.

1	Determine whether the MSO has an effective audit program in place to ensure that the EMS is reviewed and its performance reported .
2	Determine how the EMS auditors are trained and whether they are competent
3	Determine the strategic capacity of the MSO for improved environmental management. Indicators: - percentage of budget devoted to R&D on environmental issues - profiles of personnel whose responsibilities include improving environmental policies

- c) Provide for safe storage and disposal of residual wastes and process residues; [P #6.d)]
- i. Wastes from MSO operations are managed according to the following hierarchy in order of most preferred to least preferred: avoided, reduced, reused, recycled, treated or properly disposed.

1	Determine whether there is a system for identifying and tracking hazardous materials and wastes from MSO operations. Indicators: - list of hazardous materials - hazardous waste register used to track consumption of materials and generation of waste - hazardous waste import / export permit reports
2	Determine whether there are policies and procedures in place regarding the proper storage, management and disposal of hazardous materials and wastes from MSO operations. If so, determine what these policies and procedures consist of.

- ii. Waste rock dumps and tailings dams are designed, constructed and maintained so as to ensure the long-term, secure containment of waste materials.

1	Review the design, construction and maintenance of waste rock dumps, tailings dams etc to determine whether they are constructed to ensure long term secure containment of waste. Indicators: - geotechnical reports (MS) - issue management plans - identification of potential risks to environment - engineering controls to minimize risk to environment - designs by qualified personnel, (geotechnical etc) and 3 rd party review - designs approved by regulators - waste segregation and tracking systems in place
2	Determine how often audits of waste storage areas such as rock dumps, tailings dams and other waste storage facilities, are planned and implemented. Determine how and when the findings of the audits are actioned.

- iii. The MSO has measures in place to eliminate or minimise to acceptable levels the effects of acid mine drainage.

1	Determine whether the site has established the presence of or potential for acid mine drainage.
2	Determine whether the MSO used an approved method for this determination and if so, what method was followed.
3	Determine whether there are effective programs/procedures in place to avoid, eliminate or minimise the effects of acid mine drainage.
4	If acid mine drainage exists, determine the effectiveness of monitoring and controls implemented to reduce the risk to the receiving environment.
5	Determine if the mine has an ongoing programme for identification of PAF waste rock, including modeling, segregation and selective handling.

6	Determine whether the MSO has a closure plan that will effectively manage ARD.
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- iv. Technologies are only used if independently reviewed impact assessments and management plans can demonstrate that they are the most environmentally responsible and safe option in the long term; relevant technologies particularly include: riverine tailings disposal, submarine tailings placement, in-situ leaching.

1	For all technologies used, determine if the practices were first subject to an environmental impact assessment and, if so, what the conclusions of the assessment were.
2	Determine whether the technologies underwent an independent review process. If so, determine the findings of the review in regard to stakeholder support and local community support for employing this practice and in regard to the environmental impacts and risks in the long-term.
3	Determine whether management plans have been implemented as recommended in the EIA when relevant technologies have been approved, and what these plans consist of.
4	Determine what performance monitoring programs the MSO uses to measure impacts to the receiving environment and whether the results are reported to regulators and other stakeholders.

- d) Rehabilitate land disturbed or occupied by operations in accordance with appropriate post-mining land uses; [P # 6.c)]
- i. The MSO has a rehabilitation and closure plan that has been developed with the participation of key stakeholders, including local residents and, where feasible, customary landowners.

1	Determine whether the MSO has an active rehabilitation and closure plan and, if so, what the plan entails, including assessment of environmental and socio-economic factors. Determine whether it has been developed with the participation of key stakeholders including local residents and customary landowners, and whether it has been endorsed by government.
2	Establish how the plan is reviewed to take into account changes in operations, available rehabilitation techniques and stakeholder views.
3	Determine how soon after disturbance the rehabilitation activities take place.

- e) Design and plan all operations so that adequate resources are available to meet closure requirements;
- i. The MSO makes financial provision to cover the anticipated costs of rehabilitation and any monitoring or treatment that may be required after closure, and regularly reassesses the adequacy of plans and provisions.

1	Determine the financial provisions made by the MSO for mine closure and rehabilitation and the time frame for these provisions to be made. Indicators: - projected closure costs - amount of financial provisions (budgetary, bonds and/or cash allowance) - 3 rd party costing - post closure care, monitoring and maintenance costs - number of years before closure that the mine closure plan is prepared
2	Determine the process implemented for reviewing the adequacy of plans and provisions for mine closure.

- ii. Where technically and economically feasible, the MSO's closure plan does not rely on perpetual treatment of mine waste. [P #6.e)ii.]

1	Determine whether, where technically and economically feasible, the mine closure plan does not rely on the perpetual treatment of mine waste and that mine waste will be contained and stable post closure.
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- iii. Where this is determined by independent reviewers to be the only, or best, solution, the MSO has a structure in place to fund the perpetual treatment. [P #6.e)iii.]

1	Where perpetual treatment of mine waste is to be used, determine whether this is based on an independent review that has determined this to be the only or best solution.
2	Determine whether the MSO has a structure in place to resource the perpetual treatment.

- f) Conduct or support research and innovation that promotes collaboration with local people and scientific researchers;
- i. The MSO integrates the knowledge and land management practices of Indigenous and/or local people into rehabilitation plans and activities where appropriate. [P #6.c)ii.]

1	Determine whether and, if so, how relevant Indigenous and/or local people contributed their knowledge and land management practices to the rehabilitation plan.
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- ii. Consistent with business needs and capabilities, the MSO contributes site-based scientific information to collaborative research and development on environmental issues such as operational efficiency, waste minimisation, and recycling. [P #8.b)i.]

1	Determine the extent to which the MSO contributes site-based scientific information to collaborative research and development promoting the safe and efficient use of energy, natural resources and other materials, as well as waste minimisation and recycling.
2	Determine the percentage of materials used that are recycled (post-consumer recycled material and waste from industrial sources).
3	Determine the degree to which the MSO recycles materials and water.
4	Determine whether the MSO actively engages with research institutions to study environmental solutions for the site.

2. Contribute to conservation of biodiversity and integrated approaches to land use planning. [P #7]

- a) Respect legally designated protected areas;
- i. The MSO is not located in, or does not have significant impacts upon, UNESCO World Heritage sites, other legally designated or proposed protected areas, except in circumstances where the area was designated after commencement of operations at the site and appropriate measures are being taken to prevent such impacts.

1	Determine whether the MSO is located in, or can cause significant impacts on, a UNESCO World Heritage Site, or other legally designated protected area where mining is prohibited (such as IUCN Marine Categories I to IV). Indicators: - EIA or other planning documents identifying these areas
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2	<p>Determine whether the MSO has undertaken a risk assessment of potential mine site impacts on UNESCO World Heritage Site or other legally designated protected areas. Determine what the risks entail, within the local context which includes legislative framework, stakeholder expectations, social acceptance, as well as noticeable physical effects on the natural environment.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - EPBC Act referrals - discussions with NGO representatives, academics, government officials
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- b) Support the development and implementation of scientifically sound, inclusive and transparent procedures for integrated approaches to land use planning, biodiversity, conservation and mining; [P #7.c]
- i. As far as can be determined, the activities of the mine do not cause, or contribute significantly to, any loss of biodiversity in surrounding areas.

1	<p>Determine whether the mining activity has contributed significantly to biodiversity loss in surrounding areas.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - monitoring of species, records of vegetation removal - IUCN Red List species with habitats in areas affected by operations - comparison with control sites
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- ii. The MSO has systems in place to minimise the likelihood of the mine's contributing to biodiversity loss in future. These include methods to assess and manage species and habitats.

1	<p>Determine whether the MSO has a specific biodiversity policy and the extent to which biodiversity is specifically considered in environmental impact assessments and incorporated into the MSO's environmental management system.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - identification of key threatening processes - management plans for key species and habitats - criteria for deciding that a species or habitat requires a management plan - assignment of responsibilities to staff, what their qualifications are
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- iii. The MSO identifies and manages so as to protect areas of high conservation value on site, such as areas with listed threatened species and their habitat, threatened ecological communities and habitats under-represented in the protected areas network.

1	Determine whether the MSO has identified all areas of high conservation value and has listed threatened species, their habitats, and threatened ecological communities as well as habitats under-represented in the protected areas network, within the area affected by the operation.
2	Establish the processes employed for corrective and/or restorative action resulting from the MSO's operations impacting on areas of high conservation value, listed threatened species or their habitat and threatened ecological communities or their habitat.
3	Determine whether the MSO has established effective systems to manage and monitor the biodiversity values of the above areas and species. If so, determine what those systems are.

- iv. Where appropriate, the MSO has a conservation and land management plan, developed through consultation with stakeholders, that identifies categories of land management and the management regimes.

1	Determine whether the MSO has a conservation and land management plan that identifies categories of land management and management regimes. Determine how this plan is put into practice.
2	Determine whether the conservation and land management plan was developed in consultation with relevant stakeholders.

- v. The MSO develops management plans that are consistent with the outcomes sought through regional planning processes.

1	Determine whether the MSO land use plans are consistent with regional land use plans for the area.
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- vi. Where appropriate, the MSO integrates the views, experiences and practices of local people in land-use planning and biodiversity management whilst respecting their intellectual property rights.

1	Determine whether the MSO has integrated relevant views, experiences and practices of local and Indigenous people in the development of land use plans and biodiversity strategies and, if so, how it has done so.
2	Where patented or licensed processes exist, determine whether these respect the intellectual property rights of local people.

- vii. The MSO shares its practices concerning, and experiences with, biodiversity management and disseminates data on biodiversity and land use assessment and management. [P #7.b)i]

1	Determine the extent to which the MSO shares with third parties its information and experiences in respect to biodiversity, land use assessment and management.
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III. Social Section

1. Contribute to the social, economic and institutional development of the communities in which the MSO operates. [P #9]

- a) Engage at the earliest practical stage with likely affected parties to discuss and respond to issues and conflicts concerning the management of social impacts;
- i. Social, cultural, and economic impacts of future operations are assessed and baseline data is collected with the effective participation of affected communities before commencement of site-disturbing operations.

1	<p>Determine whether the MSO has engaged with parties identified as likely to be affected in order to assess the social, cultural, economic and institutional impacts of its operations before the commencement of site disturbing operations. Determine who these parties are.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - policies on community engagement - process for identifying local communities' land and customary rights as well as any significant disputes; register of traditional land owners - procedures for identifying and protecting subsistence-related resources of local communities (- identification of parties likely to be affected - assessment of impacts - attitude surveys
2	<p>Determine whether the MSO has collected social/cultural baseline data before the commencement of site disturbing operations and, if so, what this data covers.</p>
3	<p>Determine whether an independent third party performed the SIA.</p>

- ii. The MSO develops strategies for managing social and economic impacts of construction, activities, and post-mining conditions with the participation of affected communities. [P #9.a)iv.]

1	<p>Determine whether the MSO has developed strategies to manage the social and economic impacts of its activities with the participation of the affected communities. Determine what these strategies consist of and what their outcome has been.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - Social Management System to operationalize recommendations from SIA - social surveys
2	<p>Determine the strategic capacity of the MSO for improved management of social issues.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - percentage of budget devoted to R&D on social issues - profiles of personnel whose responsibilities include improving management of social and economic impacts

- b) Secure the support of the community before taking action;
- i. The MSO ensures the provision of access to independent training and technical advice for affected communities to ensure they are aware of their rights and understand the agreements they enter into. [P #9.a)iii.]

1	Determine whether the MSO has provided independent training and technical advice for affected communities to ensure that they are aware of their rights.
2	Determine whether affected communities that are party to agreements with the MSO have been assisted where necessary to understand the agreement into which they have entered.
3	Determine when agreements have been established and how often they have been renegotiated. Indicators: - Native Title agreements - stakeholder commitment register

- ii. On-ground exploration and mining activities only proceed if and when the MSO obtains the free, prior and informed consent of Indigenous people and affected communities, including customary landowners. [P #9.a)ii.]

1	<p>Determine whether the MSO has obtained the free, prior and informed consent of relevant Indigenous people and local communities before commencing each stage of mining activities. If so, determine how this consent is defined and how it was obtained.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - forums where community members meet with MSO to discuss issues of concern (NC) - methods used to identify indigenous and local communities and relevant stakeholders likely to be affected by the proposed development, as well as community-level decision-makers and representative institutions - procedures for provision of information to communities e.g. notification and public consultation of the proposed development by the proponent - mechanisms for indigenous and local community participation, including for the participation of women, the youth, the elderly and other vulnerable groups, in the impact assessment processes - process for recording the views and concerns of the members of the indigenous or local community whose interests are likely to be impacted by a proposed development, and how this was agreed upon - process whereby local and indigenous communities may have the option to accept or oppose a proposed development that may impact on their community - identification and provision of sufficient human, financial, technical and legal resources for effective indigenous and local community participation in all phases of impact assessment procedures - identification of actors responsible for liability, redress, insurance and compensation - methods used to conclude agreements, or action plans, on mutually agreed terms, between the proponent of the proposed development and the affected indigenous and local communities, for the implementation of measures to prevent or mitigate any negative impacts of the proposed development - establishment of a review and appeals process - issues on which community participation and support are sought (e.g. access to land, SIAs and EIAs – public review, project design and implementation, community development planning, closure, etc.) - dispute resolution mechanisms - community involvement in monitoring and oversight - company policies and practices for situations in which community support is lacking - documented meetings with communities - interviews with representatives of a range of community subgroups
2	<p>Determine whether any agreements reached during this process are being upheld and whether communities still support the MSO's activities.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - documentation of agreements - interviews with signatories - 3rd party community surveys

- c) Minimise health risks for affected communities;
i. Community health hazards associated with the MSO are identified and assessed and appropriate control measures are implemented. [P #5.b)iii.]

1	<p>Determine whether the MSO has identified and assessed the impact of public health hazards on its operations and vice versa.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - documented assessment of hazards associated with disease (HIV/AIDs, tuberculosis, hepatitis, malaria, etc) - documented assessment of the potential for site emissions to affect community health - documented assessment of the potential for occupational disease at the facility - register of likely potential occupational diseases - records and reviewing of prevalence and incidence of occupational disease
2	<p>Determine how these hazards are managed.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - documentation of means to educate employees about public health hazards and associated risks - type and availability of prevention and treatment measures - interviews with employees to ascertain their awareness of public health hazards - community outreach awareness programs - mutual health agreements with outside health officers/doctors etc.

- ii. The MSO informs regulators and affected parties as soon as practicable of significant incidents, associated risks and the steps taken to remedy their impacts. [P #4.a)iii.]

1	<p>Determine whether effective systems are in place that clearly identify which incidents are significant. Determine whether these incidents, as well as associated risks and the steps taken to remedy their impacts, are reported to regulators and affected parties within the required timeframes (or, where timeframes are not mandated, when the reporting takes place).</p>
2	<p>Determine whether the effectiveness of the incident reporting systems is audited and reviewed.</p> <p>Indicators:</p> <ul style="list-style-type: none"> - review of correspondence between MSO and regulators

- d) Respect the human rights, culture and heritage of affected communities, including Indigenous people; [P #3.f)]
- i. The MSO respects human rights, as outlined under the Universal Declaration of Human Rights (UDHR). In interpreting the UDHR, rights should be recognised as complementary, indivisible and interdependent.

1	<p>Determine whether the site has access to a copy of, or advice regarding the United Nations Universal Declaration of Human Rights, and has identified which Articles are relevant to the business, contractors and business partners, e.g.</p> <ul style="list-style-type: none"> - safe and healthy working conditions; - freedom of association; - fair remuneration; - non-discrimination in personnel practices; - no forced or child labour; - no forcible displacement of individuals, groups or communities; - respect for existing international guidelines and standards for use of security personnel
2	<p>Determine whether the MSO has effective systems in place to ensure that human rights are respected in accordance with the UNDHR.</p>

3	Determine whether regular reviews take place to assess performance against the relevant Articles of the United Nations Universal Declaration of Human Rights. Determine whether effective systems are in place to respond to and manage non-conformances.
4	Determine which Declaration Articles have been communicated to employees, contractors and business partners, and that they abide by the principles of the Declaration.
5	Determine whether regular reviews take place to assess performance against the relevant Articles of the United Nations Universal Declaration of Human Rights.
6	Assess through interviews the attitude/understanding of employees and contractors to the rights of the affected community, in particular Indigenous people.
7	Determine whether effective systems are in place to respond to, and manage, non-conformances with the UNDHR.

- ii. The MSO respects the political and cultural identity of Indigenous people as distinct people, their rights and connections to ancestral lands and resources, their culture and heritage, and their decision making and dispute resolution processes.

1	Determine the extent to which the MSO respects the rights, connections to ancestral lands and resources, political and cultural identities, culture and heritage, and decision-making and dispute resolution processes of Indigenous people.
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- iii. The MSO protects significant sites.

1	Determine whether the MSO has a policy regarding protection of significant sites. Indicators: - documented plans for the protection of sites of cultural, ecological, economic, or religious significance, of traditional laws and customs, and of cultural and intellectual property and knowledge, developed in collaboration with local residents and/or Indigenous landowners - evidence of what stage in the project the plan was developed - documented evidence as to who agreed to the plan - interviews with customary landowners as to whether the plan is satisfactory - heritage clearance register and documentation
2	Determine whether the sites remain protected as agreed in the plan. - procedures for informing employees and contractors as to the locations of sites, how to treat them, and how to report findings of additional sites - documentation of incidents and accidents, ways in which these were dealt with - interviews with employees and subcontractors working near these sites to ascertain whether they are aware of the sites' locations - interviews with customary landowners and local residents to ascertain whether they are satisfied with the protection of sites

- iv. The MSO develops, with the effective participation of affected communities and Indigenous people, a code of conduct to apply to all employees and contractors, covering areas such as cross-cultural relations, responsible use of alcohol, and relationships with local people.

1	Determine whether the MSO has a policy or code of conduct that applies to all employees and contractors, covering areas such as cross-cultural relations, responsible use of alcohol, and relationships with local people.
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2	Determine whether the policy / code has been developed with the effective participation of affected communities and Indigenous people.
3	Determine the effectiveness of the implementation of the policy / code of conduct.

- v. The MSO provides employees and contractors, and especially those involved in decision making, with relevant cultural awareness and human rights training and guidance. Affected communities, traditional owners and custodians are invited to develop, deliver and/or participate in cultural awareness training. [P #3.d)i.]

1	Determine whether the MSO undertakes training needs assessments to determine the cultural and human rights training required by each employee and contractor. Determine how often these assessments occur and how the needs are assessed.
2	Determine whether the training needs identified have been effectively addressed through the development/provision of appropriate courses/programs
3	Determine whether relevant affected communities, traditional owners/custodians have been invited to participate in the development or delivery of the training courses.
4	Determine in what timeframe the training courses have been delivered/are planned to be delivered to the identified personnel and what records of training are maintained.

- vi. The MSO demonstrates that its public and/or private security arrangements protect human rights and are consistent with international standards. [P #3.d)ii.]

1	Determine whether the MSO has identified international standards applicable to its security operations and whether it has implemented systems to ensure that human rights and security are protected. Determine whether there is a system to confidentially investigate complaints from affected parties. Indicators: - data on the activities of security providers
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- e) Avoid or minimise involuntary resettlement; where resettlement cannot be avoided, compensate fairly for adverse effects on the community; [P #3.e)]
- i. The MSO avoids or minimises resettlement of communities, except in cases of trespassing on existing mine sites.

1	Determine the means the MSO uses to avoid or minimise involuntary resettlement and the separation of communities from their lands. Indicators: - policies and practices regarding resettlement - number of sites where resettlement took place and numbers of households resettled - guidelines for resettlement (e.g. World Bank guidelines)
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- ii. Where it has been necessary to undertake resettlement, a resettlement plan has been prepared in accordance with international standards and with the effective participation of all social subgroups, classified according to gender, ethnicity, economic status, etc.

1	Determine whether the site has prepared a resettlement plan in accordance with international standards.
2	Determine the extent to which people affected by involuntary resettlement programs have been consulted and involved in resettlement planning.

3	Determine which social subgroups, classified according to gender, ethnicity, economic status, etc., have participated in the development of resettlement plans.
4	Determine whether and, if so, what compensation or benefits have been paid to local land owners and assess the methods used to determine the values. Assess the extent of local land owner involvement in the process.

- iii. Resettlement plans provide for sustainable livelihoods for all social subgroups post-resettlement that are at least equivalent to those available pre-resettlement. Resettlement plans should, wherever possible, include the option of returning to the land.

1	Determine whether resettlement plans provide effectively for post resettlement standards of living and livelihoods to be at least equivalent to those available before resettlement.
2	Determine whether resettlement plans effectively allow for the return of people to their land at a later date (e.g. post closure).

- f) Compensate for any environmental or social damages.

- i. The MSO provides appropriate levels of compensation in the case of loss of, or damage affecting, the property (owned under formal or customary law), resources (including common property resources), health or livelihoods of affected communities and customary landowners. [P #9.a)v.]

1	Determine whether the MSO has policies to provide compensation to Indigenous people and affected communities in the case of loss of, or damage affecting, the property (owned under formal or customary law), resources (including common property resources), health or livelihoods of affected communities and customary landowners.
2	Determine whether the compensation schedule has been reached in agreement with Indigenous people and affected communities.
3	Determine whether in the event of environmental or social damages, compensation payments have been made consistent with the schedule.

- g) Enhance social and economic development by seeking opportunities to provide employment and improve local living conditions; [P #9.e)]

- i. The MSO develops opportunities for employment, training, and capacity building with the participation of affected communities.

1	Determine whether the MSO has a effective policies and systems to develop opportunities for employment, training and capacity building within the affected communities. Indicators: - procurement / local recruitment and employment policies - contractor relationships - numbers of local employees at MSO - membership of Corporate Leaders for Indigenous Employment Project
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- ii. The MSO respects Indigenous people's right to economic development benefits flowing from its operations.

1	Determine the extent to which the MSO seeks to provide opportunities for economic development in conjunction with the community.
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- iii. The MSO supports local businesses and products, whenever feasible and consistent with sound business practice, and works with stakeholders to establish business and other opportunities that are designed to be sustained beyond the life of the mine.

1	Determine whether and, if so, the degree to which the MSO supports local businesses and products. Determine the conditions under which it does this. Indicators: - percentage of goods, materials and services purchased locally
2	Assess whether and, if so, when and how the MSO works with local stakeholders to assist in the establishment of business and other opportunities designed to be sustained beyond the life of the project.

- iv. The MSO works with local communities affected by poverty, such that they benefit from economic development arising from MSO activities. [P #9.e)v.]

1	Determine the extent to which the MSO provides direct or indirect economic benefits from its activities to local communities affected by poverty. Indicators: - investments in public infrastructure and other community projects, and their development impact - local investment vehicles e.g. trust funds, community foundations - the amount and type of royalty payments, their distribution within the community and the social impacts of these payments
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- h) Encourage partnerships with governments and non-government organisations to ensure that programmes (such as community health, education, local business development) are well designed and effectively delivered; [P #9.d)]
- i. The MSO participates in and/or encourages partnerships and programs (public and/or private sector) that seek to improve environmental and social outcomes in the surrounding region. [P #9.e)iv.]

1	Determine the extent to which the MSO has sought to establish partnerships with government and non government organisations to ensure that community programs are well designed and delivered.
2	Assess the extent of the efforts of the MSO towards improving environmental or social outcomes in the area through these partnerships and programs Indicators: - documented provision of funding, employee volunteerism, product and services donations, education services

- ii. The MSO conducts regular reviews of its community agreements and development activities. [P #9.e)vi.]

1	Determine whether the MSO conducts audits of the effectiveness of the implementation of its community agreements and development activities and, if so, how frequently it does so.
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2. Implement effective and transparent engagement, communication and independently verified reporting arrangements with mining stakeholders. [P #10]

- a) The MSO reports on its economic, social and environmental performance with information that is timely, accurate and relevant;

- i. The MSO, or its corporate entity, makes publicly available information on the performance of the MSO (e.g. an annual public performance report).

1	Determine whether the MSO's corporate entity produces honest, realistic, publicly available and accessible information on the social, environmental and economic performance of the MSO. Indicators: - annual public performance report - financial reports - summary report suitable for communication/distribution to local stakeholders - verification of data presented in report
2	Determine whether the MSO's policies are made available in the local languages or other appropriate formats (e.g. oral, pictorial).
3	Determine which risk information the MSO communicates about its activities and how it is communicated to its external stakeholders. Assess whether these stakeholders have received this information.
4	Determine which risk information the MSO communicates about its activities and how it is communicated to all levels of employees and contractors. Assess whether employees and contractors have received this information and ascertain the extent to which this correlates with the risk register.
5	Determine whether there are opportunities for the community to provide feedback to the MSO on its reports.

- b) Engage with and respond to stakeholders through open and ongoing consultation processes. [P #9.c]
- i. The MSO conducts a stakeholder analysis to identify stakeholders (including minorities and marginalised groups), their rights and interests, and regularly reviews this during the life of the operations.

1	Determine whether the MSO conducts systematic stakeholder analyses to identify the appropriate stakeholders, and their rights and interests, for its open consultation processes.
2	Determine whether the list of identified stakeholders is reviewed throughout the life of the operations and, if so, how regularly.

- ii. Stakeholder engagement, consultation and communication use two-way processes of dialogue that are open, just and transparent.

1	Determine how MSO engages with stakeholders.
2	Assess the methodologies used for monitoring the levels of satisfaction, and/or complaints, among stakeholders such as government, interest groups, Indigenous peoples, disadvantaged peoples, local communities etc.

- iii. Consultation processes undertaken by the MSO address the needs and protect the rights of marginalised groups, including women, Indigenous people and the economically marginalized.

1	Determine whether and, if so, how MSO consultation processes address the needs and protect the rights of marginalised groups, including women, Indigenous people and the economically marginalised.
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- iv. Outcomes of consultation processes are considered and, where appropriate, integrated into management planning, systems and operations.

1	Determine whether the outcomes of stakeholder consultation processes are considered. Determine whether and, if so, how these are integrated into management planning, systems and operations.
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- v. The MSO has appropriate mechanisms in place for hearing and resolving stakeholder grievances.

1	Determine whether the MSO has mechanisms for hearing and resolving stakeholder grievances and complaints. Determine how these complaints are addressed and whether stakeholders are satisfied with these processes.
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