



# **LBMA RESPONSIBLE SOURCING PROGRAMME MSM/LSM SITE VISIT REPORT**

V2, 16.01.2019



Visited By (Name of Representative):.....

Date of the visit:.....

<b>COMPANY INFORMATION</b>	
Company Name	Company website:
Registered address	
Name of the mine	
Location of the mine	Town Region Country
Name of the mine site operator if not a wholly owned subsidiary	

## GOVERNANCE

<p>Company Policies Does the company have the following policies? Please attach a copy or a link to the relevant page on the corporate website.</p>	<p>Mission statement Code of conduct Anti-bribery and corruption Business integrity and ethics Conflict minerals Environment Health and Safety Environmental Impact Assessment HR policies Modern slavery and human trafficking Procurement policy Whistleblowing policy</p>
<p>Does the company have an effective policy preventing:</p> <ul style="list-style-type: none"> <li>Harassment, bullying or discrimination on the grounds of age, sex, colour, religion caste, national origin, and sexual orientation?</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please attach a copy or a link to the policy</p>
<p>Does the company respect freedom of association and collective bargaining?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>
<p>Does the company ensure provision of fair remuneration to all employees?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>
<p>Industry Memberships - please list relevant industry association memberships (e.g. WGC, ICMM, EITI) Extractive Sector Transparency Measures Act (ESTMA).</p>	
<p>Has the company signed up to relevant industry codes of conduct? If yes how are these commitments verified?</p>	
<p>Permit(s) type(s):</p>	
<p>Have the local authorities performed an on-site visit in the past 12 months?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide a copy or a link to the report</p>
<p>Is a visit by local authorities planned in the next 12 months?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>

Approximate total number of workers directly employed at the mine	
Does the company have a policy prohibiting child labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Are any workers employed by subcontractors?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Is employment freely chosen?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company prohibit any use of forced labor (e.g.: not permitting employees to change jobs) including bonded or involuntary prison labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Do miners live on the premises of the mine (e.g.: in a dormitory)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
If yes please describe the facilities (e.g. washrooms, canteens, recreational facilities).	
Are working hours, excluding overtime, limited to a maximum of 48 hours per week?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Has the company received any reports or complaints of pressure, threats, bad or degrading treatment, etc. from employees or third parties, including sexual violence?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Are the employees represented by a syndicate or equivalent body?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details



Have the employees been on strike during the past 12 months?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Other comments:	

## HEALTH AND SAFETY

Did you see a visible health and safety policy?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please attach a copy or a link to the policy
Does the company maintain an active Safety Committee?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company regularly report leading and lagging safety statistics?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company run an active internal safety audit programme?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Has the company implemented an ISO 45001 Occupational Health and Safety Management System, or nationally recognised equivalent?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company offer regular health monitoring and screening to prevent workplace illnesses?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details



Does the company provide adequate first aid equipment and training?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Is the workplace environment secure?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Is personal protective equipment (PPE) freely available for employees and site contractors?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company enforce compliance to PPE requirements by all personnel?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the mine provide safety training to visitors?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the mine use the accident rate as key performance indicator?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
What is the mine safety track record for the past 24 months?	
Are there appropriate procedures to train security personnel	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Is site security managed in-house or outsourced to a third party?	Comments:
Other comments:	

## GOLD EXTRACTION AND PROCESSING METHOD

Describe the mining site (open pit, underground, etc.).	
Describe the extraction techniques.	
What is the annual production in tonnes?	
Describe the processing techniques, including chemical products used.	
What type of material will be sent to our refinery for processing?	
Is the infrastructure and/or the equipment set up proportionate to the production figures?	<input type="checkbox"/> Yes <input type="checkbox"/> No Comments:
Is there any routine maintenance programme for mining equipment, and are maintenance records kept?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details



Describe the method/process to avoid negative impact on the environment (e.g.: adequate tailing treatment, system to avoid pollution emission, etc.)	
Does the company have procedures for storing, using and disposing of hazardous chemicals?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Other comments:	



## ARTISANAL MINING NEXT TO THE MINE SITE

<p>did you identify any artisanal miners next to the mine site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>
<p>If yes, estimate the number of ASM miners on the concessions.</p>	
<p>Can these ASM miners be considered Legitimate ASM?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>
<p>How does the mine handle artisanal miners next to the mine site?</p>	
<p>Have there been any instances of conflict or tension? If yes please describe.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>
<p>Does the mine source from artisanal miners on its concession?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details</p>
<p>Does the mine source ore or doré from mines outside its concession?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Other comments:</p>	

## COMMUNITY

Does the company have a policy regarding resettlement of communities, including consultation and compensation?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please attach a copy, or link to relevant website
Does the company engage with indigenous communities to obtain meaningful consent prior to commencing activities that adversely affect cultural heritage?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company perform environmental or social impact assessments for new projects?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company have regular meetings with local representatives?  If yes is there a provision for anonymously voicing concerns.	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details  <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If yes please provide brief details
Is the mine positively affecting the surrounding communities, for example: <ul style="list-style-type: none"> <li>• Number of direct employees at the site</li> <li>• Number of indirect jobs supporting the mine site</li> <li>• Legitimate taxes/royalties paid to the local government?</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the company measure the economic benefit that your operations bring to the local community?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Is the mine negatively affecting the surrounding communities (health and safety, access rights)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details

Does the company actively seek to minimise the impact on biodiversity in the areas where it operates	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Is the community facing issues that would impact our refinery's reputation (e.g. organized crime, prostitution, alcoholism, abuse of fragile community members, children schooling)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Does the company have a policy to "act as a good neighbour" minimizing dust, noise and light pollution from its operations?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Have there been demonstrations or social unrest in relation with the mine? If so, how was it handled by the mine and the authorities?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details

## CONFLICT AREA AND SECURITY

Is the mine located in a conflict area?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Are there any armed groups stationed on/near the mine site?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details  If yes: Is it state armed groups? <input type="checkbox"/> Yes <input type="checkbox"/> No Is it non-state armed groups? <input type="checkbox"/> Yes <input type="checkbox"/> No Is it public or private security forces? <input type="checkbox"/> Yes <input type="checkbox"/> No
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	



Describe the precious metal storage security infrastructure and processes.	
Describe storage facility and security of hazardous chemicals.	
How do you assess the security infrastructure?	<input type="checkbox"/> Adequate <input type="checkbox"/> Inadequate Comments:
Have you identified any indication of illegal taxation or extortion of money across the whole supply chain?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please provide brief details
Summarise the environment relating to tax/fees/royalties paid to government (taxes on the extraction, trade, transport and export of gold).	



## TRANSPORTATION

Summaries transportation methods from mine site to export location.

Is the material stored by a third party prior to export

Yes  No  
If yes please provide brief details

Other comments:



**CORRECTIVE ACTIONS RAISED DURING VISIT**

Corrective Action	Mine Comment	Completion Date



## REFINER MANAGEMENT REVIEW

General comments:

Risk rating

Low

Medium

High

Next Visit Due