

EXHIBIT / FOOT NOTE

15

GLOBAL INDUSTRY STANDARD ON TAILINGS MANAGEMENT

AUGUST 2020

PRINCIPLE 7 DESIGN, IMPLEMENT AND OPERATE MONITORING SYSTEMS TO MANAGE RISK AT ALL PHASES OF THE FACILITY LIFECYCLE, INCLUDING CLOSURE.

- Requirement 7.1 Design, implement and operate a comprehensive and integrated performance monitoring programme for the *tailings facility* and its appurtenant structures as part of the *TMS* and for those aspects of the *ESMS* related to the *tailings facility* in accordance with the principles of *Adaptive Management*.
- Requirement 7.2 Design, implement and operate a comprehensive and integrated engineering monitoring system that is appropriate for verifying design assumptions and for monitoring potential failure modes. Full implementation of the *Observational Method* shall be adopted for non-brittle failure modes. Brittle failure modes are addressed by conservative design criteria.
- Requirement 7.3 Establish specific and measurable performance objectives, indicators, criteria, and performance parameters and include them in the design of the monitoring programmes that measure performance throughout the *tailings facility lifecycle*. Record and evaluate the data at appropriate frequencies. Based on the data obtained, update the monitoring programmes throughout the *tailings facility lifecycle* to confirm that they remain effective to manage risk.
- Requirement 7.4 Analyse technical monitoring data at the frequency recommended by the *EOR*, and assess the performance of the *tailings facility*, clearly identifying and presenting evidence on any deviations from the expected performance and any deterioration of the performance over time. Promptly submit evidence to the *EOR* for review and update the risk assessment and design, if required. Performance outside the expected ranges shall be addressed promptly through *Trigger Action Response Plans (TARPs)* or *critical controls*.
- Requirement 7.5 Report the results of each of the monitoring programmes at the frequency required to meet company and regulatory requirements and, at a minimum, on an annual basis. The *RTFE* and the *EOR* shall review and approve the technical monitoring reports.

Meaningful Engagement	<p>A process of mutual dialogue and decision-making whereby Operators have an obligation to consult and listen to stakeholder perspectives, and integrate those perspectives into their business decisions. Meaningful engagement involves measures to overcome structural and practical barriers to the participation of diverse and vulnerable groups of people. Strategies for addressing barriers must be appropriate to the context and the stakeholders involved, and may include, for example, logistics and other support to enable participation. Preconditions to meaningful engagement include: access to material information that can be reasonably understood; a structure that enables transparent communication; and accountability for engagement processes and outcomes.</p>
Mitigation Hierarchy	<p>Identifies a series of essential, sequential steps that Operators must follow through the project lifecycle in order to limit negative impacts and to enhance opportunities for positive outcomes. It describes a process to anticipate and avoid adverse impacts on workers, communities and the environment from a proposed action. Where avoidance is not possible, actions must be taken to minimise, and where residual impacts remain, to compensate fairly or offset for the risks and impacts.</p>
Observational Method	<p>A continuous, managed, integrated, process of design, construction control, monitoring and review that enables previously defined modifications to be incorporated during or after construction as appropriate. All of these aspects must be demonstrably robust. The key element of the Observational Method is the proactive assessment at the design stage of every possible unfavourable situation that might be disclosed by the monitoring programme and the development of an action plan or mitigative measure to reduce risk in case the unfavourable situation is observed. This element forms the basis of a performance-based risk management approach. The objective is to achieve greater overall safety. See Peck, R.B. (1969) "Advantages and Limitations of the Observational Method in Applied Soil Mechanics" <i>Geotechnique</i> 19, No2., pp.171-187.</p>
Operations, Maintenance and Surveillance Manual	<p>Describes the performance indicators and criteria for risk controls and critical controls, and the ranges of performance linked to specific pre-defined management actions. An OMS manual also describes the procedures for collecting, analysing and reporting surveillance results in a manner consistent with the risk controls and critical controls and that supports effective, timely decision-making.</p> <p>The link between OMS activities and critical controls management underscores the fact that it is essential that OMS Manuals be developed to reflect site-specific conditions and circumstances. An OMS Manual cannot be purchased 'off-the-shelf'. To be effective, it must be tailored to the site.</p>
Operator	<p>An entity that singly, or jointly with other entities, exercises ultimate control of a tailings facility. This may include a corporation, partnership, owner, affiliate, subsidiary, joint venture, or other entity, including any State agency, that controls a tailings facility.</p>

Co-convened by the International Council on Mining and Metals (ICMM), United Nations Environment Programme (UNEP) and Principles for Responsible Investment (PRI), the Global Tailings Review has established a robust, fit-for-purpose international standard for the safer management of tailings storage facilities.



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