### Annexure I

# Detailed guidance on management systems in relation to SMI's Code of Conduct

PRINCIPLE ONE Integrate sustainable development considerations within the corporate decision making process

Key management actions required:

Integration of sustainability principles into company policies and practices.

Plan, design, operate & close operations to enhance sustainable development.

Encourage and ensure good practice & innovation to improve sustainability performance.

Encourage customers, business partners and suppliers of goods and services to adopt principles that are comparable to our own.

Provide sustainable development training at all levels in our own employees and those of contractors.

Support public policies and practices that foster open and competitive markets.

Support public policies and practices that foster open and competitive markets.						
	Potential Management and Reporting Activities Steps Taken					
In relation to Corporate vision/polices	1.1	Clear definition of what sustainable development means for the company and commitment to integrating sustainable development in the company's operations in corporate policy  Mechanism to ensure that corporate policy is informed for benchmarking sustainable development best practice in the industry sector and beyond Corporate policy signed off by senior management	Fill in the details of steps taken/initiated by the company against each potential			
In relation to standards and guidelines	2.1 2.2 2.3 2.4	Clear communication with who must comply with corporate policy on sustainable development Management and employee awareness of the requirement of corporate policy relating to sustainable development Procurement policy to ensure sustainable development performance outcomes in key contacts Guidelines on evaluating sustainable development implication of major	activity mentioned in the third column			
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10	investment or other material business decision  Clear and company wide communication program for corporate policy on sustainable development  Mechanism to ensure clear communication of sustainable development requirement of procurement policy to potential contractors/suppliers.  Documented process to train appropriate personnel in what corporate policy on sustainable development means for them personally and in their day to day activities, including their accountability.  Systems for identifying training needs relating to sustainable development, and for ensuring required training is delivered in a timely manner  Systems to integrate evaluation and management of sustainable development opportunities and risks into business planning at corporate and operational level relating to full life-cycle of operations, in particular approval of major investments  Documented systems to identify, report, track and close-out issues relating to sustainable development.  Mechanism for identifying and engaging with relevant stakeholders, including public policy makers, on sustainable development issues  Performance improvement targets to drive progress against commitments of corporate policy on sustainable development.  Systems for monitoring, measurement and reporting of performance  Auditing of compliance with corporate policy on sustainable development				
	3.11	Regular management review of systems to ensure they continue to be effective, in consultation with relevant stakeholders System to ensure implementation of corporate policies at unit level Relevant Documents To Be Provided to SMI				
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resorant Booking to Bo Frontack to Cim							
1.Corporate policy (s) for sustainable	3.	Details of Sustainable audits if conducted	5.	Action Taken Reports			
development		(work order)	6.	Training details			
2.Minutes of review meetings	4.	Documentation of Management Systems					

# PRINCIPLE TWO

Conduct business with ethical practices and sound systems of corporate governance

Key management actions required:

Develop and implement ethical business practices.

Implement policies and practices that seek to prevent bribery and corruption.

Comply with or continually exceed the requirements of applicable laws and regulations.

Work with the governments, industry and other stakeholders to evolve appropriate public policy, laws and regulations that facilitate the mining, minerals and metals sector's contribution to sustainable development.

	Poter	ntial Management and Reporting Activities	Steps Taken
In relation to Corporate vision/polices	1.1 1.2 1.3 1.4 1.5	Clearly articulated corporate policy on ethical business principles and practices and sound systems of corporate governance, including 'no bribery and policy on potential payments  Mechanism to ensure that corporate policy draws on best practice in the industry sector and beyond  Corporate policy signed off by senior management  Clear commitment to comply with laws and regulations  Clear commitment to work with relevant stakeholders to achieve appropriate public policy, laws, regulations and procedures that facilitate contribution to sustainable development	Fill in the details of steps taken/initiated by the company against each potential activity mentioned in the third column
In relation to standards and guidelines	2.1 2,2 2.3 2.4 2.5 2.6	A 'code of conduct' or similar that explains what the corporate policy means in practice for business unit and operations day to day activities Clear communication of who must comply with code of conduct Management and employee awareness of the requirements of the code of conduct Company standards and guidelines to support business units and operations compliance with all applicable legislation in each jurisdiction of operation Procedure for informing relevant third parties in the situation of a potential legal non-compliance Guidance on participation in public policy making process, including clear accountabilities	
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10 3.11	Clear and company wide communication program for corporate policy or Corporate Governance and ethical practicies Records to demonstrate that appropriate personnel have been trained in what the code of conduct means for them personally and in their day to day activities, including their accountability.  Mechanism for evaluating adherence with the code of conduct across the business Documented process to identify, report, track and close-out issues relating to the code of conduct and potential legal non-compliances, including corrective action plans.  Grievance procedure including confidential, third party whistle blowing mechanism  System for recording and reporting on requests relating to political payments and bribes and subsequent action taken, and regular reporting of all payments made to governments.  Mechanism for identifying and engaging with relevant stakeholders, including public policy makers, on issues related to ethical business practices  Auditing of compliance with code of conduct  Systems for monitoring, measurement and reporting of performance  Regular management review of systems to ensure they continue to be effective, in consultation with relevant stakeholders  System to ensure implementation of corporate policies at unit level	
		Relevant Documents To Be Provided to SMI	

#### **Relevant Documents To Be Provided to SMI**

- Corporate policy (s)
   Minutes of review meetings
- 3. Details of audits if conducted (work order)
- 4. Documentation of Management Systems
- 5. Action Taken Reports
- 6. Training details

# PRINCIPLE THREE

Implement risk management strategies based on valid data and sound

Key management actions required:

Consult with interested and affected parties in the identification, assessment and management of all significant social, health, safety, environmental and economic impacts associated with our activities. Ensure regular review and updating of risk management systems.

Inform potentially affected parties of significant risks from mining, minerals and metals operations and of the measures that will be taken to manage the potential risks effectively.

Develop, maintain and test effective emergency response procedures in collaboration with potentially affected parties.

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	Poter	ntial Management and Reporting Activities	Steps Taken	
In relation to Corporate vision/polices	1.1 1.2 1.3 1.4	Clearly articulated corporate risk assessment and management process Mechanism to ensure that corporate process is informed by bench marking best practice in the industry sector and beyond Commitment to corporate processes signed off by senior management Senior management accountability for identifying, evaluating and managing risks, such as corporate risk or audit committee	Fill in the details of steps taken/initiated by the company against each potential activity	
In relation to standards and guidelines	2.1 2.2 2.3 2.4	Clear communication of who must comply with corporate risk assessment and management processes  Management and employee awareness of the requirements of the corporate plans and procedures  Guidelines to ensure consistent risk assessment and management processes across the business  Procedure for emergency preparedness and response	mentioned in the third column	
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10 3.11	Clear and company wide communication program for risk management processes  Mechanism to ensure clear communication of the key risks facing the business to employees and relevant external stakeholders.  Documented process to train appropriate personnel in what risk management means for them personally and in their day to day activities, including their accountability.  Risk management and mitigation system  Senior management review of key risks and process for appropriate response e.g. risk mitigation program  Mechanism for identifying and engaging with relevant stakeholders, including public policy makers, on risk management issues  System for identifying potential emergencies and developing appropriate emergency response strategy, including periodic test of emergency response procedures  Performance improvement targets to drive improved risk management System for monitoring, measurement and reporting of performance Regular management review of systems to ensure they continue to be effective, in consultation with relevant stakeholders  System to ensure implementation of corporate policies at unit level		
		Relevant Documents To Be Provided to SMI	'	
Corporate policy     Minutes of review meetings	W	3. Details of audits if conducted (work order)     4. Documentation of Risk Management Systems and Emergency response system      5. Action Taker 6. Training details from those listed above, as applicable 8 available should be provided.	ails	

# PRINCIPLE FOUR:

### Seek Continual Improvement in health and safety performance

Key management actions required:

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 our own employees, those of contractors and the communities where we operate.

Provide necessary medical facilities.

Take all practical measures to eliminate workplace fatalities, injuries and diseases.

Provide all employees with health and safety training, and require employees of contractors to have undergone such training.

Implement regular health surveillance and risk based monitoring of employees.

Potential Management and Reporting Activities Steps Taken				
In relation to Corporate vision/polices	1.1 1.2 1.3	Clearly articulated corporate policy on health and safety Mechanism to ensure that corporate policy is informed by bench marking best practice in the industry sector and beyond Corporate policy signed off by senior management	Fill in the details of steps taken/initiated by the company against each	
In relation to standards and guidelines	2.1 2.2 2.3 2.4	Health and safety standards setting out practical operational requirements in line with corporate policy Clear communication of who must comply with corporate policy and standards Management and employee awareness of the requirements of the corporate policy on health and safety Procedure for hazard identification, assessment and control in relation to activities, products and services, including those of contractors and suppliers	potential activity mentioned in the third column	
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10 3.11 3.12 3.13	Clear and company wide communications program for the corporate policies on health and safety.  Documented process to train appropriate personnel in what health and safety policies mean for them personally and in their day-to-day activities, including their responsibility and accountability. Training provided to both direct employees and contractors.  Occupational health and safety management systems consistent with recognized quality standards.  Procedures for incident investigation, including corrective and preventative action.  Mechanism to establish and maintain health and safety behaviors culture in the workforce, including skills assessment.  Documented process to identify, report, track and close-out issues relating to health and safety, including hazards, and potential legal non-compliances, including corrective action plans.  Mechanism to ensure consideration of health and safety impacts in business planning processes.  System for rehabilitation to identify reasonable opportunities for employees to return to work following illness or injury.  Mechanism for identifying and engaging with relevant stakeholders, including public policy makers, on health and safety issues.  Performance improvement targets to drive progress against commitments of corporate policy on health and safety.  System for measurement, monitoring and reporting of health and safety performance.  Auditing of compliance with corporate policy on health and safety.  Regular management review of systems to ensure they continue to be effective, in consultation with relevant stakeholders.  System to ensure implementation of corporate policies at unit level		

#### Relevant Documents To Be Provided to SMI

- Corporate policy (s)
   Minutes of review mosting
- 2. Minutes of review meetings
- 3. IME/PME records of employees including those of contractors
- 4. Documentation of Safety Mechanisms
- 5. Action Taken Reports
- 6. Training details

# PRINCIPLE FIVE

Seek continual improvement of our environment performance based on a precautionary approach

Key management actions required:

Assess the positive and negative, the direct and indirect, and the cumulative environment impacts of new projects.

Focussed environmental management system to mitigate adverse environmental impacts.

Involve local communities and authorities to avoid or minimize local and regional environmental impacts. Rehabilitate land disturbed or occupied by operations with appropriate post mining land uses.

impacts. Renabilitate land disturbed or occupied by operations with appropriate post mining land uses.			
	Pote	ntial Management and Reporting Activities	Steps Taken
In relation to Corporate vision/polices	1.1 1.2 1.3	Clearly articulated group level policy on environmental management as relevant to the company's operations, which is aligned with this Principle Mechanism to ensure corporate policy is informed by benchmarking best practice in the industry sector and beyond.  Corporate policy signed off by senior management.	Fill in the details of steps taken/initiated by the company against each potential
In relation to standards and guidelines	2.1 2.2 2.3 2.4	Standards setting out practical operational requirements in line with corporate environment policy and relevant legal obligations, e.g. tailings management, environmental assessment for project lifecycle and closure. Clear communication of who must comply with the corporate environment policy.  Management and employee awareness of the requirements of corporate environment policy.  Procurement policies to implement environment requirements through the supply chain.	activity mentioned in the third column
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10 3.11 3.12	Clear and company wide communications program for the corporate environment policy.  Documented process to train appropriate personnel in what environment policy means for them personally and in their day-to-day activities, including their responsibility and accountability. Training provided to both direct employees and contractors.  Environmental Management System consistent with recognized quality standards.  Procedures for environmental hazard identification, assessment and control in relation to activities, products and services, including those of contractors and suppliers.  Procedures for incident investigation, including corrective and preventative action.  Documented process for identification, management and transparent reporting of environment issues and potential legal non-compliances, including corrective action plans.  Mechanism for identifying and engaging with relevant stakeholders, including public policy makers, on environment issues.  Performance improvement targets to drive progress against commitments of corporate policy on environment.  System for measurement, monitoring and reporting of performance, including energy use and GHG emissions.  Auditing of compliance with corporate policy on environment.  Regular management review of systems to ensure they continue to be effective, in consultation with relevant stakeholders.  System to ensure implementation of corporate policies at unit level	
		Relevant Documents To Be Provided to SMI	
Corporate policy     Minutes of review meetings		3.Details of Environmental Audits (Work order)  4.Documentation of Environmental Expenses  5. Action Taken R 6. Training details	

#### PRINCIPLE SIX Uphold fundamental human rights and respect cultures, customs and values in dealings with employees and others who are affected by our activities

Key management actions required:

Ensure fair remuneration and work conditions for all employees and do not use forced, compulsory or child labour.

Provide for the constructive engagement of employees in upholding the freedom of association and right to collective bargaining.

Implement policies and practices to eliminate harassment and unfair discrimination.

Provide all relevant staff including security personnel with appropriate cultural and human rights training and guidance.

Minimize involuntary resettlement and compensate fairly for adverse effects on the community where they cannot be avoided.

Respect the culture and heritage of local communities, including indigenous/tribal people.

Potential Management and Reporting Activities  Steps Taken				
	. 5.0		Fill in the	
In relation to Corporate vision/polices	1.1	Clearly articulated corporate policy on employment and human rights, including anti-harassment, anti-discrimination, resettlement, cultural heritage which is aligned with this Principle  Mechanism to ensure that corporate policy is informed by benchmarking best	details of steps taken/initiated by the company	
	1.3	practice in the industry sector and beyond.  Corporate policy signed off by senior management.	potential	
In relation to	2.1	Clear communication of who must comply with corporate policy on	mentioned in	
standards and	2.1	employment and human rights.	the third	
guidelines	2.2	Management and employee awareness of the requirements of corporate policies relating to employment and human rights.	column	
	2.3	Guidance to set out how employment and human rights policies should be		
		implemented in practice across the business, and in relation to business partners, in particular contractors.		
	2.4	Guidance on evaluation of resettlement options and appropriate compensation.		
	2.5	Guidance on effective community consultation to ensure the culture and heritage of local communities is recognized and respected.		
	2.6	Guidance on activities to gain and maintain the broad community support of the communities on which operations are located		
In relation to	3.1	Clear and company wide communications program for corporate policies on	_	
Management	3.1	employment and human rights.		
Systems	3.2	Mechanism to ensure clear communication of requirements of employment		
		and human rights policies to business partners, in particular contractors.		
	3.3	Documented process to train appropriate personnel in what corporate policy		
		and guidance on employment and human rights mean for them personally and in their day-to-day activities, including their accountability.		
	3.4	System for recording and managing employee grievances and dispute		
		resolution, including confidential, third-party mechanism to report potential		
		human rights abuses or raise employee grievances.		
	3.5	Documented system to identify, report, track and close-out issues relating to		
	3.6	employment and human rights.  Mechanism for identifying and engaging with relevant stakeholders, including		
	0.0	public policy makers, on issues related to employment and human rights.		
	3.7	Performance improvement targets to drive progress against commitments of		
	0.0	corporate policy on employment and human rights.		
	3.8 3.9	System for monitoring, measurement and reporting of performance.  Auditing of compliance with corporate policy on employment and human		
	3.9	rights.		
	3.10	Regular management review of systems to ensure they continue to be		
		effective, in consultation with relevant stakeholders.		
	3.11	Consultation with local communities in accordance with corporate guidelines,		
		in relation to ongoing operational issues and potential resettlement situations.		
	3.12	System to ensure implementation of corporate policies at unit level		
	0.12	Relevant Documents To Be Provided to SMI		
Corporate policy	ı (e)		udits conducted	
Corporate policy     Documentation	, , ,	· ·		

- - **Documentation of Management** and action taken 4. Training details **Systems**

(work order)

#### **PRINCIPLE SEVEN**

Contribution to conservation of biodiversity and integrated approaches to land use planning and management

Key management actions required:

Documentation of

Respect legally designated protected areas and culturally sensitive sacred grooves.

Emphasis on restoration of natural ecosystems to rebuild local bio diversity.

Disseminate scientific data and promote practices in biodiversity assessment and management.

Disseminate scientific data and promote practices in biodiversity assessment and management.				
	Poten	ial Management and Reporting Activities	3	Steps Taken
In relation to Corporate vision/polices	1.1 1.2 1.3	Clearly articulated group level policy on biodiversity a company's operations, which is aligned with this Principle Mechanism to ensure corporate policy is informed by practice in the industry sector and beyond. Corporate policy signed off by senior management.		Fill in the details of steps taken/initiated by the company against each potential activity
In relation to standards and guidelines	2.1 2.2 2.3	Standards or guidelines to implement the corporate p Clear communication of who must comply with the co policy. Management and employee awareness of the require biodiversity policy.	prporate biodiversity	mentioned in the third column
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10 3.11	Clear and company wide communications program for biodiversity policy.  Documented process to train appropriate personnel is policy means for them personally and in their day-to-their responsibility and accountability.  Systems in place to conduct biodiversity risk identifice mitigation planning and implementation at all operation decommented process for identification, management reporting of biodiversity issues and potential legal no corrective action plans.  Mechanism for identifying and engaging with relevant public policy makers, on biodiversity issues.  Performance improvement stakeholders to optimize expensive impacts.  Performance improvement targets to drive progress a corporate policy on biodiversity.  System for monitoring, measurement and reporting of Auditing of compliance with corporate policy on biodices and provement targets to ensure the effective, in consultation with relevant stakeholders.  System to ensure implementation of corporate policies.	n what the biodiversity day activities, including ation and assessment, and stages and transparent n-compliances, including a stakeholders, including osystem integrity and against commitments of a performance.	
		Relevant Documents To Be Provided		
1. Corporate policy	3			

**Management Systems** NB: - One or more documents from those listed above, as applicable & available, should be provided. Any other documents if relevant can also be provided.

4. Training details

### **PRINCIPLE EIGHT**

Facilitate and encourage responsible use, reuse and recovery of mined materials including associated natural resources

Key management actions required:

Advance understanding of the properties of mined out resources and their lifecycle effects. Conduct and support research that promotes effective use of resources.

Develop and promote the concept of integrated resource management. Provide regulators and other stakeholders with scientifically sound data.

Support the development of scientifically sound policies, regulations, standards and material choice decision that encourage the safe use of mined out material.

Provide for safe storage and disposal of residual wastes and process residues.

Potential Management and Reporting Activities  Steps Taken			
In relation to Corporate vision/polices	1.1 Cle alig 1.2 Me pra	early articulated corporate policy on materials stewardship, which is gned with this Principle. Echanism to ensure that corporate policy is informed by benchmarking best actice in the industry sector and beyond.  Tryorate policy signed off by senior management.	Fill in the details of steps taken/initiated by the company against each potential
In relation to standards and guidelines	pro pro 2.2 Cle ste 2.3 Ma	didance on implementing the corporate policy through decision-making on solucts and solucts and solucts and solucts and solutions are communication of who must comply with the corporate materials are communication of who must comply with the corporate materials are communication of who must comply with the corporate materials are communication of who must comply with the corporate materials stewardship policy.	activity mentioned in the third column
In relation to Management Systems	3.2 on Me ste 3.3 Do me acc 3.4 Sys effi 3.5 Me pul life cor 3.7 Sys ecc 3.8 Au 3.9 Re effi 3.10 Sys	ear and company wide communications program for the corporate policy materials stewardship.  Schanism to ensure clear communication of requirements of materials stewardship policy in the supply chain.  Cumented process to train appropriate personnel in what corporate policy cans for them personally and in their day-to-day activities, including their countability  Stem to identify and implement potential materials stewardship and ecociciency opportunities in the supply chain.  Schanism for identifying and engaging with relevant stakeholders, including bolic policy makers, on materials stewardship, including public disclosure of cycle information to contribute to the development of sound public policy. Informance improvement targets to drive progress against commitments of reporate policy on materials stewardship.  Stem for monitoring, measurement and reporting of performance, including poefficiency metrics to improve the eco-efficiency of products.  diting of compliance with corporate policy on materials stewardship. gular management review of systems to ensure they continue to be ective, in consultation with relevant stakeholders.  Stem to ensure implementation of corporate policies at unit level	
4 Comparate val		Relevant Documents To Be Provided to SMI	amaluated (
1. Corporate policy (s)       3. Latest technologies adopted to promote       5. Details of audits conducted (work order)         2. Documentation of Management Systems       4. Research Programs       6. Training Details         NB: - One or more documents from those listed above, as applicable & available, should be provided. Any			

other documents if relevant can also be provided.

# PRINCIPLE NINE

Contribute to the social, economic and institutional development of the communities in which we operate

Key management actions required:

Engage community to discuss and respond to issues and conflict concerning the management of social impacts.

Involve affected communities in developing work programs and determining outcomes.

Encourage partnerships with governments and non-governmental organizations for effective delivery of programmes.

Contribute to skill and capacity building of individuals and community groups.

Potential Management and Reporting Activities Steps Taken				
In relation to Corporate vision/polices	<ul> <li>1.1 Clearly articulated corporate policy on community and economic development, which is aligned with this Principle</li> <li>1.2 Mechanism to ensure corporate policy is informed by benchmarking best practice in the industry Sector and beyond.</li> <li>1.3 Corporate policy signed off by senior management.</li> </ul>	Fill in the details of steps taken/initiated by the company against each potential		
In relation to standards and guidelines	<ul> <li>Standard or guidelines setting out practical operational requirements in line with corporate community policy and relevant legal obligations.</li> <li>Clear communication of who must comply with the corporate policy.</li> <li>Management and employee awareness of the requirements of corporate policies relating to community development.</li> <li>Standard or guidelines on stakeholder identification and effective consultation/engagement</li> </ul>	activity mentioned in the third column		
In relation to Management Systems	<ul> <li>Clear and company wide communications program for the corporate policy on community and economic development.</li> <li>Documented process to train appropriate personnel in what corporate policy means for them personally and in their day-to-day activities, including their accountability.</li> <li>System to identify, report and track community development activities, in particular local capacity building program and integrated closure planning, informed by community needs assessment</li> <li>System to track and respond to community concerns in a timely manner, supported by an independent dispute resolution mechanism.</li> <li>Mechanism for identifying and engaging with relevant stakeholders, including public policy makers, on issues relevant to local communities through the full operation lifecycle</li> <li>Existence of partnerships with relevant stakeholders to assist in implementation of the company's business planning and sustainable development policy</li> <li>Performance improvement targets to drive progress against commitments of corporate policy on community and economic development.</li> <li>System for measurement, monitoring and reporting of performance</li> <li>Auditing of compliance with corporate policy on community and economic development.</li> <li>Management review of systems to ensure they continue to be effective, in consultation with relevant stakeholders.</li> <li>System to ensure implementation of corporate policies at unit level</li> </ul>			

#### Relevant Documents To Be Provided to SMI

1.	Corporate policy (s)
2.	<b>Documentation of Management</b>
	Systoms

- Community Response Systems (organization chart etc)
- 4. Local employment details
- 5. Details of audits conducted (work order)
- 6. CSR activities & outcomes

# PRINCIPLE TEN Implement effective and transparent engagement, communication and verifiable reporting arrangements with our stakeholders

Key management actions required:

Engage with and respond to stakeholders through an open and participative consultation process. Constantly document and report on economic, social and environmental performance. Exchange data, implementation procedures, and experiences even personal wherever necessary. Provide information that is independently verifiable.

Potential Management and Reporting Activities			Steps Taken
In relation to Corporate vision/polices	1.1 1.2 1.3 1.4	Corporate commitment to report publicly on its sustainable development performance, ideally using GRI reporting Guidelines, in policy or other statement, which is aligned with this Principle Corporate commitment to consult to understand the views of key stakeholders in policy or other statement.  Mechanism to ensure corporate policy is informed by benchmarking best practice in the industry sector and beyond.  Corporate policies signed off by senior management.	Fill in the details of steps taken/initiated by the company against each potential activity mentioned in the third
In relation to standards and guidelines	2.1 2.2 2.3 2.4	Standards or guidelines setting out reporting requirements for businesses and for data and information to be independently assured.  Clear communication of who must comply with the corporate commitments on engagement,  Management and employee awareness of the requirements of corporate commitments on  Engagement and communication.  Standard or guidelines on stakeholder identification and effective consultation/engagement.	column
In relation to Management Systems	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10 3.11	Clear and company wide communications program on the corporate commitments.  Documented process to train appropriate personnel in what the requirements mean in their day-today activities, including their accountability.  Corporate mechanism to gather information on material issues across all significant parts of the business and to respond to corporate level stakeholders' needs.  Mechanism for each business unit/operation to gather information on material issues across all significant parts of their activities, responding to their own stakeholders' needs.  Mechanism to enable reported information and assurance conclusions to be used by corporate, business units and operations to assess performance and to drive improvement.  Mechanism to identify and engage with relevant stakeholders, including public policy makers, and to use feedback to inform company's approach to communication and engagement.  Annual public disclosure of relevant information and corporate policies in a timely and accessible way, at corporate and project or operation-specific level.  System to track and respond to stakeholder concerns in a timely manner. System for monitoring, measurement and reporting of performance.  Regular management review of reporting systems to ensure they continue to be effective, in consultation with relevant stakeholders.  System to ensure implementation of corporate policies at unit level	
		Relevant Documents To Be Provided to SMI	

#### Relevant Documents To Be Provided to SMI

- Corporate policy (s) or statement (s)
- 4. SD Reports
- 2. Documentation of various mechanisms in place

NB: - One or more documents from those listed above, as applicable & available, should be provided. Any other documents if relevant can also be provided.

3. Reporting Methodologies