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CONFIDENTIAL DOCUMENT

**ECOLOGO Certification Program for Responsible Development  
for the Mineral Exploration Industry**

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## 57 **1. Purpose**

58 This Program outlines responsible development requirements for the mineral exploration  
59 industry. Certification of companies is contingent on verification of compliance with  
60 requirements of the Program by an independent auditor. UL ECOLOGO is the  
61 administrator of this certification Program.

## 62 **2. Scope**

63 This Program applies to companies conducting mineral exploration activities and wish to  
64 be recognized for their application of responsible development practices. Not all indicators  
65 in this Program will apply to all activities, projects, or applying companies; non-applicable  
66 indicators shall be justified. This Program does not apply to exploration on active mining  
67 sites.

### 68 **2.1. Mineral Exploration**

69 The mineral development process involves two main phases, mineral exploration and  
70 mineral deposit appraisal, each with varying impact on the environment and surrounding  
71 communities. Hence, the requirements of this Program may vary according to the nature  
72 of operations conducted by companies.

73 **Mineral Exploration:** The mineral exploration phase includes grass-roots mineral  
74 exploration activities such as regional surveys to detect anomalies, prospecting and ground  
75 surveys, acquisition of mineral rights and sampling (including trenching and initial drilling)  
76 to investigate these anomalies. It also includes more advanced exploration activities to  
77 delimitate a mineral deposit and interpret some of its characteristics (grade, quality,  
78 tonnage) through further sampling, drilling and the application of other techniques such as  
79 downhole geophysics and initial mineral processing tests. It is in this late stage of the  
80 Mineral Exploration phase that the amount of inferred resources and some indicated  
81 resources can be determined.

82  
83 **Mineral Deposit Appraisal:** The mineral deposit appraisal phase requires larger financial  
84 commitments and is a key step in determining if a project can become a viable mining  
85 operation. In this phase, the mineral deposit is further defined (to an indicated and/or  
86 measured resource) through detailed mapping, sampling and drilling and the viability of  
87 the project is determined through engineering, economic and environmental studies that  
88 support prefeasibility and feasibility studies to, in turn, support a production decision.

89

### 90 3. Definitions

91 **Accommodation:** Amicable agreement, compromise, excluding accommodations from  
92 treaties or negotiations between the government and the communities.

93 **Affected stakeholder:** Individual or group affected by a company's decisions or  
94 operations, excluding Indigenous communities, which have been defined separately  
95 (Indigenous communities).

96 **Applicant:** Individual or company requesting certification or renewal of certification.

97 **Camp:** All supporting infrastructure and outbuildings where employees live during  
98 mineral exploration work.

99 **Claim:** A claim to the minerals within a specified area that has been located or acquired  
100 by a method set out in the Acts and Regulations of the province or territory in which it is  
101 made and grants the holder exclusive rights to explore mineral wealth for a specific  
102 duration of time.

103 **Company:** Any individual or entity that performs or that mandates other companies to  
104 complete mineral exploration work as defined in Section 2.1.

105 **Criterion:** A second level principle that is concrete and achievable without being a direct  
106 measure of performance.

107 **Cultural heritage:** Is the collective of cultural resources, inherited from past generations,  
108 which include but are not limited to the resources and sites that are protected through  
109 Provincial and Federal legislation but also include, as defined by the Indigenous  
110 Community, ideas, experiences, worldviews, objects, forms of expressions, practices,  
111 knowledge, spirituality, food, stories, resources, kinship ties and places valued by  
112 Indigenous Peoples.

113 **Indicator:** Observable or measurable variable for judging if a criterion is met.

114 **Indigenous Community:** Indigenous populations are communities that live within, or are  
115 attached to, geographically distinct traditional habitats or ancestral territories, and who  
116 identify themselves as being part of a distinct cultural group, descended from groups  
117 present in the area before modern states were created and current borders defined. They  
118 generally maintain cultural and social identities, and social, economic, cultural and political  
119 institutions, separate from the mainstream or dominant society or culture. Indigenous  
120 communities in this context refer to First Nation, Inuit or Métis communities with existing  
121 or asserted aboriginal and treaty rights as defined by Section 35 of the Constitution Act,  
122 1867, that may be directly or indirectly impacted by mineral exploration activities.

123 **Local:** The region within which mineral exploration and appraisal are conducted, as well  
124 as any surrounding areas that may be impacted by future mine complex development.

125 **Local authority:** Authorities within a region as recognized by federal, provincial and  
126 territorial governments.

127 **Mining lease:** Mining title, which grants the holder exclusive rights to exploit mineral  
128 resources as set out in the Acts and Regulations of the province or territory in which the  
129 title is granted.

130 **Mining right:** Immovable property rights, such as claims, leases and dispositions, as set  
131 out in the Acts and Regulations of the province or territory in which the rights are granted.

132 **Outstanding geological site:** Land whose geological, geomorphic, landscape or biological  
133 characteristics are of educational value, or of interest for scientific research or conservation  
134 purposes, and that deserves to be protected, in particular because it is threatened, rare or  
135 vulnerable.

136 **Potentially affected stakeholder:** Individual or group potentially affected or affected by  
137 a company's decisions or operations, excluding Indigenous communities, which have  
138 been defined separately (Concerned Indigenous community).

139 **Principle:** A fundamental truth or law as the basis of reasoning or action.

140 **Riparian ecotone:** Transitional zone between the water environment and the forest,  
141 characterized by the muscinal, herbaceous or shrubby vegetation of wetlands and  
142 sometimes including a few scattered trees.

143 **Stakeholder:** See potentially affected stakeholder and/or affected stakeholder

144 **Sustainable development:** Development that meets the needs of the present without  
145 compromising the ability of future generations to meet their own needs.

146 **Urbanized area:** Urbanized areas as defined by provincial legislation, and according to  
147 the limits reproduced on mining title maps.

148 **Water environment:** Regular or intermittent flow streams, rivers and lakes.

149 **Wetland:** Swamps, marshes, ponds and bogs.

150

## 151 **4. Legal Requirements**

152 All laws, regulations, guidelines and policies in effect shall be respected by the company.  
153 Certain legal elements, which are marked with an asterisk, are subject to specific  
154 requirements in this Program, particularly due to the potential for serious consequences for  
155 non-adherence. The organization's legal compliance is not limited to these requirements.  
156 It is the company's responsibility to identify and comply with all other legal requirements  
157 related to its operations.

158

159 \* Sections marked with an asterisk are based on legal requirements.

160

## 161 **5. Compliance with Sustainable Development Principles Along the** 162 **Value Chain**

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164 5.1.1. Verification of compliance with requirements related to the performance of work  
165 delegated to suppliers by the applying company: Where the applying company  
166 has delegated work covered by this Program to a supplier, the requirements in  
167 relation to such work shall be respected by the latter. The applying company shall  
168 provide all relevant information and ensure compliance with these requirements  
169 on the part of the contracted suppliers, but retains the overall responsibility.

170

171 5.1.2. Compliance with specific conditions for performing works by applying service  
172 providers: Conditions for performing works set out in the permits, authorization  
173 certificates and agreements entered into between the company holding the claims  
174 and potentially affected stakeholders and concerned Indigenous communities,  
175 shall be complied with. The applying service provider shall obtain all information  
176 pertaining to these conditions and comply with them.

177

## 178 **6. Environmental Quality**

### 179 **6.1. Efficient Use of Natural Resources**

180 6.1.1. Consumption of resources: The Company shall measure and show evidence of the  
181 application of continuous improvement practices surrounding the consumption of  
182 water, energy sources and in relation to the creation and release of greenhouse  
183 gases.

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185 6.1.2. Residual materials: The Company shall show evidence of a material management  
186 tracking system according to the 4 Rs hierarchy (Reduction at source, Reuse,  
187 Recycling and Recovery)

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\* Indicators marked with an asterisk are based on legal requirements.

## 192 **6.2. Soil Quality**

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### 6.2.1. Access - permit\*:

When a company's operations include cutting trees, construction or improvement of infrastructure (roads, bridges, culverts, bypasses, etc.) on land, it shall obtain a permit and comply with the applicable provincial and territorial regulations.

Access – land use\*: Company operations shall not unduly affect the natural contour of the land and, drainage, and shall not lead to sedimentation, channeling or water accumulation.

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6.2.2. Traffic\*: Exploration activities shall be conducted in a manner that minimizes soil loss so that the site can be reasonably reclaimed to support appropriate self- sustaining vegetation. Machinery traffic shall be optimized in the project zone; traffic for constructing, deactivating and reclaiming infrastructure and maintaining equipment shall not be within the required riparian setback of water environments or wetlands in order to avoid soil compaction and rutting. If required, a ministerial authorization shall be obtained when exploration activities will occur within regulated riparian setback distances.

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6.2.3. Machinery - Maintenance: In order to avoid all types of leaks, machinery shall be equipped with a maintenance log, routinely inspected and maintained in good condition. All mechanised equipment shall be equipped with the necessary materials for responding to safety incidents and accidents.

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6.2.4. Hazardous materials – management \*: All operations involving hazardous materials shall be conducted in accordance with applicable regional regulations. An emergency plan shall be established for all hazardous materials.

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6.2.5. Lubricants and oils: Hydraulic oils, lubricants and soaps that are non-toxic, biodegradable (60% in 28 days) and compliant with international environmental certifications shall be used when operating drilling machinery.

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6.2.6. Calcium Chloride (CaCl<sub>2</sub>): Alternatives to calcium chloride use will be investigated. The concentration of calcium chloride shall be closely monitored by the refract meter to ensure the minimum required concentration is maintained. The use of calcium chloride shall be managed to protect workers and the

229 environment. A recirculation system shall be deployed to reduce calcium chloride  
230 use. Bags of calcium chloride shall be stored in a manner that limits the potential  
231 for spill to ground, water exposure or wind dispersal.

232 6.2.7. Explosives\*: The possession, storage and transport of explosives shall be  
233 conducted in accordance with applicable regulations and as legally mandated.

234

235 6.2.8. Reclamation or Restoration: All exploration sites shall be restored to their natural  
236 state. Mineral exploration companies shall have a current reclamation or  
237 restoration plan that outlines the activities that will be undertaken to restore the  
238 site as per the agreed upon or required end-land use and as required by the  
239 regulator. Reclamation of mineral exploration sites normally includes the  
240 following:

241 a) Removal of equipment, buildings, materials and infrastructure used in  
242 exploration.

243 b) Preparing the ground, recontouring and stabilization of slopes and drainage  
244 systems.

245 c) Replacing topsoil, organic matter and woody debris that were salvaged and  
246 stockpile before and during mineral exploration.

247 d) Revegetation and seeding (if needed).

248 e) Monitoring to ensure reclamation objectives have been met.

249

250 6.2.9. Reclamation or Restoration Plan – Financial Guarantee: Mineral exploration  
251 companies shall ensure that at all times there are sufficient funds to carry out the  
252 work outlined in the current reclamation or restoration plan and if required that a  
253 bond or financial guarantee has been deposited with the appropriate regulator.

### 254 **6.3. Water Quality**

255 6.3.1. Water environments or wetlands\*: Prior to a company's operations occurring  
256 near-water environments or wetlands, it shall validate the type of water  
257 environment or wetland on the site. Conditions specific to the environment shall  
258 be observed.

259

260 6.3.2. Campsite\*: All campsites shall comply with applicable regulations for temporary  
261 work camps. In addition, companies shall demonstrate efficient and responsible  
262 waste water handling practices on the sites.

263

264 6.3.3. Groundwater withdrawal: No mineral drilling operations shall occur within 30  
265 meters of a water extraction site independent of a water system, and at 100 meters  
266 from a water extraction site that supplies a water system.

267



- 268 6.3.4. Water withdrawal\*: The amount of water withdrawn from a body of water for  
269 mineral drilling purposes shall not compromise the natural environment's  
270 integrity. Also, a screen shall be installed at the end of the hose from the pump.  
271
- 272 6.3.5. Suspended solids: Prior to the beginning of operations, facilities and materials that  
273 minimize the emission of suspended solids in wetlands or water environment shall  
274 be installed in the drilling machine's immediate surroundings.  
275
- 276 6.3.6. Wastewater: Wastewater generated by mineral exploration work that reaches  
277 wetlands or water environments shall be free of oil and suspended solids visible to  
278 the naked eye.  
279
- 280 6.3.7. Pumping stations: Pumping stations shall be located at least 10 meters away from  
281 the riparian ecotone, and 15 meters when the slope is greater than 30%.  
282
- 283 6.3.8. Disposal of drilling mud – urban areas and agricultural land: When operations  
284 occur in urban areas or on agricultural land, drilling mud shall be disposed of at  
285 an authorized site.  
286
- 287 6.3.9. Disposal of drilling mud- other territories: Drilling mud shall be eliminated in a  
288 small natural depression or in a safe and fitted trench according to the site permit  
289 or at least 30 meters away from wetlands and water environments in order to  
290 contain suspended solids and avoid any leaching of particles to these areas.  
291
- 292 6.3.10. Machinery – provisioning and storage: Provisioning and storage of all mobile  
293 machinery shall occur at least 30 meters away from water environments and  
294 outside of wetlands.  
295
- 296 6.3.11. Wetland drilling - winter: Other than drilling by helicopter, drilling in wetlands  
297 shall be conducted in winter, when the ground is frozen over 35 centimetres deep,  
298 except in cases that are justified.  
299
- 300 6.3.12. Wetland drilling - seasons other than winter - machinery: When it is impossible to  
301 conduct wetland drilling during winter, machinery and a drilling platform with a  
302 greater load bearing capacity than the surrounding ground shall be used.  
303
- 304 6.3.13. Wetland drilling - seasons other than winter – access road: When it is impossible  
305 to conduct wetland drilling during winter and an access road shall be built,  
306 engineered mats shall be used instead of gravel. If gravel has to be used, a  
307 geotextile shall be placed underneath it so that all materials can be recovered at  
308 the end of operations.  
309  
310

311 **6.4. Respect for Sensitive Areas and Wildlife Habitat**

312

313 6.4.1. Territorial restrictions: The companies shall respect restrictions that affect the  
314 territory and apply all practices recommended by the relevant ministries.

315

316 6.4.2. Located species at risk\*: Companies whose operations may alter the habitat of a  
317 species at risk (on public and private land) shall adhere to species at risk  
318 legislation.

319

320 6.4.3. Species at risk potentially present on site: Employees shall be familiar with  
321 species at risk potentially present on site (public and private land) in order to  
322 recognize them even if they have not been previously identified or located. In  
323 such cases, the company shall notify the relevant ministry and apply any  
324 recommended mitigation or avoidance procedures

325

326 6.4.4. Dam, nest and den\*: A verification of the existence of any beaver dam, animal  
327 nest or den shall be conducted prior to activities. No such habitat shall be  
328 destroyed except where such habitat is likely to cause serious harm to an existing  
329 infrastructure or when a permit from the provincial or territorial ministry having  
330 jurisdiction has been issued prior to destruction.

331

332 6.4.5. Fish\*: When a company's operations may cause serious harm to fish as defined by  
333 the Fisheries Act that are part of commercial, recreational or Indigenous fisheries,  
334 or fish that support such fishery, an authorization from the relevant ministry shall  
335 be obtained. Where a specific Department of Fisheries and Oceans (DFO) code of  
336 practice applies, it shall be adhered to.

337

338 6.4.6. Fire protection: A fire protection plan shall be in place at all times. When a  
339 company's operations take place during the fire season as defined in the region of  
340 operation, the relevant authority having jurisdiction shall be notified and a  
341 protection plan shall be obtained, if required by that authority.

342

343 6.4.7. Tree Cutting: Tree cutting in quantity and quality shall be kept to a minimum as  
344 required by the activities undertaken. Cutting of rare species and old growth trees  
345 shall be avoided when possible.

346

347 6.4.8. Invasive alien species: Material and equipment that come in contact with the  
348 natural habitat shall be free from fragments or seeds of invasive alien species.

## 349 7. Quality of Life

350 Not all indicators may be relevant in this section; refer to Section 5 for applicability.

### 351 7.1. Recognition of the Concerns and Accommodation of Communities 352 Affected

#### 354 7.1.1. Identifying, contacting, and responding to potentially affected stakeholders:

355 Any potentially affected stakeholder shall be identified prior to any mineral  
356 exploration activities. The company shall provide information and exchange  
357 mechanisms, in addition to inviting potentially affected stakeholders to express  
358 their concerns to a company representative responsible for collecting,  
359 processing, and responding within a maximum of 30 days.

362 7.1.2. Claim acquisition notice\*: Within 60 days of the claim acquisition (filed with  
363 the provincial Ministry or another entity, as applicable), the relevant local  
364 authority(ies) shall be informed of the claim acquisition and given the company  
365 representative's contact information.

367 7.1.3. Notice to Local Authorities – Commencement of work\*: A minimum of 30 days  
368 before commencement of work, the relevant local authority(ies) shall be  
369 informed of work scope, location, and timetable.

371 7.1.4. Permission to access the land: At least 30 days before the beginning of  
372 operations on a private property, the company shall use its best efforts to reach  
373 an agreement with the landowner or tenant, confirming permission to access  
374 the land and the conditions under which the mineral exploration will be  
375 conducted (nature, impacts and location of intended operations, schedule,  
376 mitigation measures, etc.). Documentation shall be retained in situations where  
377 an agreement is not reached.

379 7.1.6. Information sharing: Information provided to potentially affected stakeholders  
380 shall meet the following requirements:

- 381
- 382 a. be understandable: communicated in a language suited to the stakeholders,  
383 and outlined clearly;
  - 384 b. be relevant: present a clear and direct link with the subject and be of  
385 importance to the stakeholders;
  - 386 c. be objective: based on experience, realistic and free of personal interests;
  - 387 d. be timely: communicated at the relevant time;
  - 388 e. be reliable: based on credible sources and facts that can be validated;

- 389 f. be truthful: based on reality and non-misleading;  
390 g. be complete: not partial, present both positive and negative aspects;  
391 h. be precise: focused and accurate;  
392 i. be accessible: free to consult and available in a way that serves the  
393 stakeholders best.  
394

395 7.1.7. Implementation of mitigation measures: Mitigation of project related impacts, as  
396 previously determined in consultation with affected stakeholders, shall apply.  
397

398  
399 7.1.8. Remedial measure: If the mitigation measures provided for in section 7.1.7 prove  
400 insufficient, the company shall agree with affected stakeholders on a remedial  
401 measure proportional to the sustained impacts. If an agreement is impossible, the  
402 company shall indicate why the demands of affected stakeholders have been  
403 rejected.  
404

405 7.1.9. Fulfilling commitments: Commitments between the company and potentially  
406 affected stakeholders shall be respected.  
407

## 408 **7.2. Noise and Sensory Environment**

409 7.2.1. Consultation of local authorities: When planning operations involving noisy  
410 machinery or the use of explosives, local authorities shall be consulted in  
411 order to identify and implement mitigation measures required to comply  
412 with local noise and sensory nuisance regulations.  
413

## 414 **7.3. Quality of Visual Environment**

415

416 7.3.1. Quality of visual environment: Measures to mitigate and remediate  
417 negative visual impacts that affect sites of interest identified by local  
418 authorities shall be applied.  
419

## 420 **7.4. Health and Safety of the Community**

421

422 7.4.1. Risk identification and mitigation measures: Prior to the beginning of  
423 operations, health and safety risks associated with mineral exploration shall  
424 be identified and a prevention plan shall be established.  
425

426 7.4.2. Emergency response procedures: Prior to the beginning of operations,  
427 emergency response procedures for the health and safety risks identified  
428 shall be developed and implemented. If applicable, the risks identified and  
429 the procedures established shall be communicated to potentially affected  
430 stakeholders and concerned Indigenous communities.

## 431 **7.5. Respect for Cultural Heritage**

432  
433 7.5.1. Respect for cultural heritage: Protective measures to mitigate and remedy  
434 negative impacts on cultural heritage sites that are not protected by the  
435 legislation in force, and which are identified by Indigenous, local, and  
436 regional governmental authorities, shall be implemented. A chance find  
437 procedure for cultural heritage sites shall be in place.  
438

## 439 **8. Recognition of the Concerns and Engagement of Indigenous** 440 **Communities**

- 441
- 442 7.1. Identification of Indigenous communities affected: Within 48 hours of claim  
443 acquisition, the company shall request the identification and confirmation of  
444 government identified concerned and potentially concerned Indigenous  
445 communities from the relevant agency (department?- not sure on consistent  
446 vernacular)  
447
- 448 7.2. Claim acquisition notice: Within 60 days of the claim(s) being staked or otherwise  
449 acquired , the concerned Indigenous communities affected shall be informed of the  
450 claim acquisition and given the company representative's contact information.  
451
- 452 7.3. Communication and information sharing: A minimum of 30 days before the  
453 commencement of work the company will work with the concerned indigenous  
454 community to establish a communication and information sharing process for the  
455 mineral exploration activities. Notwithstanding the concerned indigenous  
456 community's right to suggest or decline a process, the process should be  
457 collaboratively developed in a manner that:
- 458 a. recognizes the varying level of experience with and knowledge of mineral  
459 exploration in indigenous communities through identifying and addressing  
460 local capacity constraints to engage in the process;
  - 461 b. incorporates traditional ecological knowledge as directed by the  
462 community;
  - 463 c. ensures information is shared in an accessible, relevant, timely and  
464 understandable manner both in initial discussions and implementation of  
465 the process;

- 466 d. seeks to identify and align with the community’s requirements for Free,  
467 Prior and Informed Consent regarding the activity, including the  
468 identification of key priority areas (nature and impacts of projected work,  
469 location of their execution, schedule, reclamation, mitigation measures,  
470 engagement);
- 471 e. provides a clear process for identification, consideration and  
472 documentation of concerns and communication related to the activity  
473 (including designated key points of contact for each party);
- 474 f. identifies standards and period of application of the process;
- 475 g. identifies a dispute resolution process (as requested).

476

477 7.4. Implementation of mitigation measures: Mitigation measures for negative impacts  
478 on Indigenous interests, as previously communicated by concerned Indigenous  
479 communities in Section 8.3, shall apply.

480

481 7.5. Remedial measure: If the mitigation measures provided for in Section 8.4 prove  
482 insufficient, the company shall agree with concerned Indigenous communities on a  
483 remedial measure proportional to the sustained impacts. If an agreement is  
484 impossible per the dispute settlement procedure in Section 8.3, the company shall  
485 indicate why the demands of concerned Indigenous communities have been  
486 rejected.

487

488 7.6. Fulfilling commitments: Commitments between the company and the concerned  
489 Indigenous communities shall be respected.

490  
491

## 492 **9. Local Procurement**

### 493 **9.1. Selection of Local Labour**

494 9.1.1. Recruiting local labour: When recruiting, the company should promote the selection of  
495 local labour with equal qualification and keep records of local recruitment efforts.

496

497 9.1.2. Support and training: Support and training measures should be implemented in  
498 order to facilitate the integration of newly hired workers.

499

### 500 **9.2. Selection of Local and Indigenous Suppliers**

501 Recruiting local suppliers: Companies shall promote the selection of qualified and  
502 competitive local, regional, and Indigenous suppliers subject to price, availability,  
503 technical capability, equipment, and keep records of local recruitment efforts.

504

## 505 10. Work Environment

### 506 10.1. Occupational Health and Safety

507 10.1.1. Prevention program\*: A prevention program intended to eliminate at the source  
508 all risks to the health, safety and physical well-being of workers shall be  
509 accessible and understood by all employees. The program shall address the  
510 following, if applicable:

- 511
- 512 a. occupational health and safety policy;
- 513 b. roles and responsibilities of workers, supervisors and executives
- 514 c. disciplinary policy;
- 515 d. procedures for newly hired employees;
- 516 e. occupational health and safety training and information programs;
- 517 f. programs for the adaptation of facilities and camp sites to the standards  
518 prescribed by the regulations for workplace infrastructure, work  
519 organization, equipment, material, contaminants, hazardous substances,  
520 procedures and resources, and collective safety equipment;
- 521 g. measures for monitoring work environment quality and preventive  
522 maintenance;
- 523 h. procedures for the use of vehicles, equipment and machinery;
- 524 i. procedures for specific operations;
- 525 j. personal protective equipment for a specific type of work
- 526

527 10.1.2. Emergency plan\*: A plan describing procedures to be applied in case of  
528 emergency shall be accessible to and understood by all employees. The plan shall  
529 be reviewed, revised, and tested annually. The emergency plan shall be developed  
530 and implemented in collaboration with local authorities, if applicable, and address  
531 the following:

- 532
- 533 a. evacuation plan (including camps);
- 534 b. accidental spills - hazardous materials;
- 535 c. evacuation and transportation of injured workers;
- 536 d. missing workers;
- 537 e. natural hazards (including forest fires, lightning, storm, cold, heat);
- 538 f. wilderness survival;
- 539 g. insect bites;
- 540 h. wildlife;
- 541 i. allergies;
- 542 j. first aid.
- 543

544 10.1.3. Training\*: All employees shall receive proper training and possess the required  
545 skills and knowledge to safely perform the assigned work. An internal tracking

- 546 system for training needs shall be in place. Examples of training according to the  
 547 types of operations include:  
 548
- 549 a. Workplace Hazardous Materials Information System (WHMIS);
  - 550 b. lockout;
  - 551 c. transportation of hazardous materials;
  - 552 d. tree cutting;
  - 553 e. first aid and cardiopulmonary resuscitation (CPR) (for at least two workers  
 554 in the field);
  - 555 f. forklift;
  - 556 g. driving licence;
  - 557 h. firearms license;
  - 558 i. acquisition, possession, storage, transport and use of explosives;
  - 559 j. blasting;
  - 560 k. emergency procedures (wilderness survival, wildlife, evacuation, etc.);
  - 561 l. specific operations (working on ice, use of equipment, machinery and  
 562 vehicles, etc.).
  - 563 m. helicopter safety training
  - 564 n. health and safety due diligence  
 565
- 566 10.1.4. Risk analysis: Risk analysis exercises involving all relevant workers shall be  
 567 carried out daily in order to identify potential hazards and actions required to  
 568 ensure the health and safety of employees.  
 569
- 570 10.1.5. Communication: A mechanism allowing workers and suppliers to raise and  
 571 discuss occupational health and safety issues shall be in place. Employees  
 572 responsible for issues of health and safety shall be designated and their names  
 573 displayed in visible and accessible locations.  
 574
- 575 10.1.6. Supervision\*: Employees shall have adequate supervision to accomplish their  
 576 tasks. When a worker performs a task alone in an isolated area where it is  
 577 impossible to request assistance, an effective periodic or constant monitoring  
 578 method shall be implemented.  
 579
- 580 10.1.7. Working on ice: Work performed on ice shall be carried out in accordance with  
 581 guidelines in the manual Best Practice for Building and Working Safely on Ice  
 582 Covers in Alberta<sup>1</sup> or similar guidelines if available in other jurisdictions.  
 583
- 584 10.1.8. Particular elements: Work performed in the search for minerals that may contain  
 585 triuranium octoxide (uranium) shall be carried out according to the Mineral

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<sup>1</sup> See: <https://open.alberta.ca/dataset/612530c3-9f41-41f3-ad45-4b62b47a0b06/resource/74decde6-8120-46be-b137-158bb63ee569/download/whs-pub-sh010.pdf>



586 Exploration Guidelines for Saskatchewan or similar guidelines if available in  
587 other jurisdictions.

## 588 **11. Business Ethics**

589

### 590 **11.1 Corruption Prevention**

591

592 11.1.1 Appointment of executives and managers: Appointed executives and managers  
593 shall demonstrate conduct that complies with business ethics and legal  
594 requirements.

595

596 11.1.2 Code of ethics: The company shall develop and implement a code describing its  
597 policies and procedures on organizational ethics. This document shall be  
598 accessible, understood, and respected by management and employees, and shall  
599 address the following, unless justified otherwise:

600

- 601 a. governance procedures and practices;
- 602 b. conflicts of interest, including transactions and agreements in respect of  
603 which an executive or manager has a material interest;
- 604 c. protection and proper use of corporate assets and opportunities;
- 605 d. confidentiality of corporate information;
- 606 e. fair dealing with the issuer's security holders, customers, suppliers,  
607 competitors and employees;
- 608 f. compliance with laws, rules and regulations;
- 609 g. disclosure of financial contributions and official public positions with  
610 regard to public policy (if applicable);
- 611 h. Anti-Harassment or Anti-Discrimination policy and procedures
- 612 i. measures to be applied regarding illegal or unethical conduct.

613

614 11.1.3 Employee engagement: Risks of corruption and ways to prevent them shall be  
615 identified in collaboration with employees, and shall be part of the company's  
616 ethical policies.

617

618 11.1.4 Training: Management and employees who are responsible for negotiating  
619 agreements shall be trained in business ethics to prevent all forms of corruption  
620 and discrimination.

621

622 11.1.5 Monitoring: A mechanism for employees and suppliers to report confidentially  
623 and without fear of reprisal any illegal or unethical conduct shall be in place.

624

### 625 **11.2 Diversity and Accountability of Board Members, Executives and Managers**

626

- 627 11.2.1 Diversity and Inclusion: Companies shall develop a diversity and inclusion  
628 strategy aimed to counter barriers to employment and opportunity for  
629 advancement.  
630
- 631 11.2.2 Participation: Executives and managers should be diligent in regards to their  
632 participation in meetings and should have all relevant information, reasonably  
633 available (in a timely fashion) and necessary for making informed decisions.  
634
- 635 11.2.3 Conflicts of interest: Executives and managers shall prioritize the company's  
636 interests and remain independent from pressure or influence, prevent potential  
637 conflicts of interest, and forfeit all personal profits they may be liable to gain by  
638 virtue of their position.  
639
- 640 11.2.4 Investigation of irregularities: Executives and managers shall promptly investigate  
641 when they have knowledge of or suspect fraud or a breach of ethics and act  
642 according to their code of ethics.  
643
- 644 11.2.5 Training - accountability: Executives and managers shall complete governance  
645 training.

## 646 **12 Transparency and Reporting**

- 647
- 648 12.1 Information sharing- mineral exploration projects and continuous disclosure\*:  
649 Information sharing regarding mineral exploration projects and ongoing  
650 disclosure shall comply with the applicable provincial and federal legislation such  
651 as provincial Professional Codes, and applicable securities legislation for public  
652 companies.  
653
- 654 12.2 Information sharing – shareholders\*: Executives and managers shall continuously  
655 disclose information to shareholders regarding their operations, including their  
656 governance practices, and any event or changes that may affect the value of the  
657 company.

## 658 **13 Innovation**

### 659 **13.1 Responsible Use of Technologies**

- 660
- 661
- 662 13.1.1 Knowledge acquisition: Acquisition of knowledge in terms of responsible  
663 technologies shall be promoted: information intelligence for existing techniques  
664 to reduce environmental and social footprint as well as operational costs shall be  
665 conducted.  
666

667 13.1.2 Application of responsible technologies: Best Available Technology Economically  
668 Achievable (BATEA) should be used. Companies shall list the known BATEA and justify  
669 if they are not being used.

670

## 671 **14 Economic Efficiency**

672

### 673 **14.1 Efficient Use of Financial Resources**

674 14.1.1 Financial analysis: Public companies shall include periodic financial analysis  
675 based on continuous improvement through public disclosures. . Private companies  
676 with outside investors shall be guided by similar disclosure practices.

677

678 14.1.2 Environmental and liability insurances: The company shall have proper and  
679 sufficient environmental and liability insurances. Service providers shall carry  
680 appropriate environmental and liability insurance when field work is undertaken.

681

682 14.1.3 Supply policy: A supply policy optimizing the procurement of services, supplies,  
683 and materials needed for the company's operation shall be developed and  
684 implemented.

685

686 13.1.5. Assessment of the appropriateness of continuation of operations: For mineral  
687 exploration companies, an evaluation on the appropriateness of the continuation  
688 of operations shall be conducted periodically according to all risks associated with  
689 the development of the project.

690

691 13.1.6. Use of flow-through share product: Mineral exploration companies shall ensure  
692 compliance with the Income Tax Act as it relates to flow-through shares and the  
693 Canadian Exploration Expense (CEE).

694

695

696