

lundin mining



Responsible Mining

MANAGEMENT SYSTEM STANDARD

For the management of the health, safety, environment and communities aspects of our business.

Table of Contents

Table of Contents	ii
Document Control	ii
Context	1
RMMS Requirement 1 – Scope of Management System	2
RMMS Requirement 2 – Responsible Mining Policy	3
RMMS Requirement 3 – HSEC Risk Management	4
RMMS Requirement 4 – Change Management	7
RMMS Requirement 5 – Legal & Other Requirements	9
RMMS Requirement 6 – Improving HSEC Performance	10
RMMS Requirement 7 – Responsibilities & Accountabilities	11
RMMS Requirement 8 – Awareness, Competency & Training	12
RMMS Requirement 9 – Communications & Stakeholder Engagement	14
RMMS Requirement 10 – Controlling Operational Activities	16
RMMS Requirement 11 – Crisis & Emergency Response	19
RMMS Requirement 12 – Incident & Action Management	21
RMMS Requirement 13 – Managing Contractors & Suppliers	22
RMMS Requirement 14 – Document Control & Recordkeeping	24
RMMS Requirement 15 – Assessing Performance & Auditing	25
RMMS Requirement 16 – Management System Review	26
Glossary & Definitions	27

Document Control

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Context

PURPOSE OF THE RESPONSIBLE MINING MANAGEMENT SYSTEM

In mid-2015 Lundin Mining Corporation (LMC) updated its corporate Health, Safety, Environment and Community (HSEC) Policy, replacing it with the Responsible Mining (RM) Policy. The RM Policy describes LMC's specific corporate commitments with respect to the health and safety of our employees and contractors as well as the Environmental, Social and Governance (ESG) aspects of our business. Lundin's Responsible Mining Framework (RMF) outlines the Company's overall approach to mining responsibly in the context of five key elements, namely Health and Safety, Social, Economic, Environmental Stewardship, and Governance. The RM Policy and RMF are available publicly on Lundin's corporate website.

This document, the Responsible Mining Management System (RMMS) Standard, supports effective implementation of the RMF and the commitments of the RM Policy, and establishes the foundation for Lundin Mining's operational health, safety, environment and communities (HSEC) programs. The requirements of this standard are intended to reduce the potential for occupational injuries and illnesses, and to support in the prevention of health, safety, environment and community incidents. Application of these requirements will assist operations with meeting HSEC objectives, with internal and external obligations, and with operating in conformance with legal requirements and social expectations.

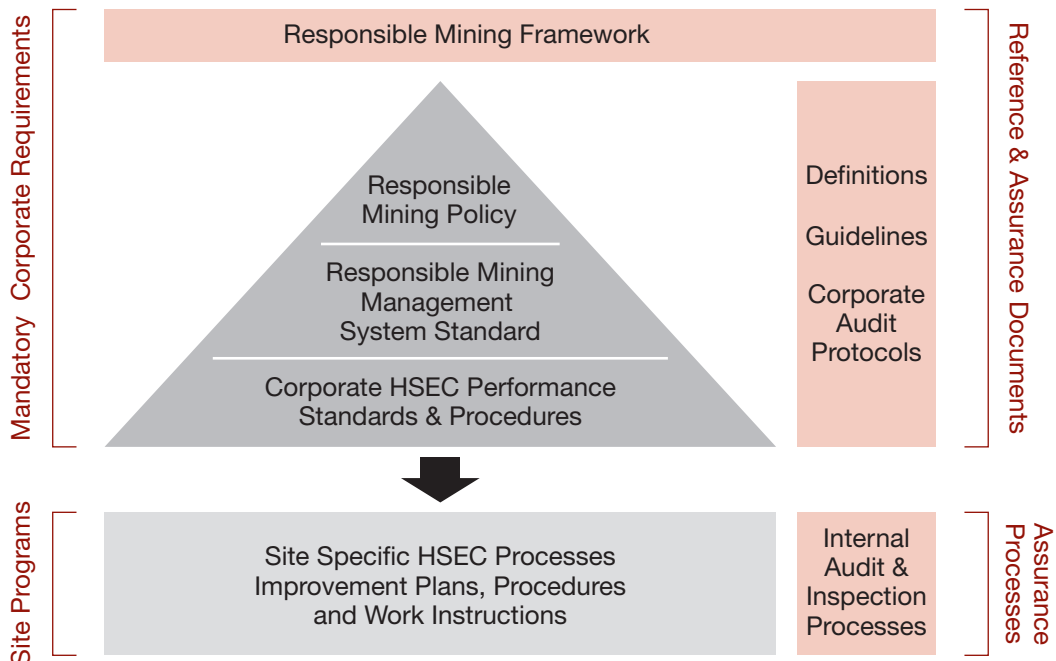
GENERAL REQUIREMENT

This standard is broken down into 16 requirements which describe mandatory HSEC criteria that apply to all LMC operations. The requirements of this standard also refer to supporting 'Performance Standards' and 'Procedures', which establish additional HSEC requirements where required.

Each LMC operation must develop and implement formal HSEC processes that meet the requirements of this standard and related LMC HSEC Performance Standards and Procedures. The implementation approach, and the complexity of the HSEC systems at each operation, will vary depending on the nature, scale and risk of operational activities. All operations are encouraged to take a pragmatic approach to implementing the requirements of this standard.

External certification (ISO, OHSAS, etc.) of HSEC systems and processes is not mandatory. The decision to seek external certification is to be made jointly by each operation and corporate management.

HIERARCHY OF RMMS DOCUMENTS



Hierarchy of RMMS Documents – This graphic depicts the structure of Responsible Mining Management System documentation.

RMMS Requirement 1 – Scope of Management System

INTENT

To establish the applicability of RMMS requirements for all LMC operations.

REQUIREMENTS

Each operation must establish formal processes that conform to the requirements of the RMMS and supporting HSEC performance standard and procedures.

1.1 APPLICATION

RMMS requirements apply to LMC managed locations of the following types:

- Undeveloped properties where work is periodically performed
- Properties and claim holdings undergoing exploration
- Properties subject to conceptual, prefeasibility or feasibility studies
- Properties under construction, in commissioning or in start-up
- Operations (mines, mills and supporting facilities) that are in production
- Operations that are under care and maintenance
- Properties that are under reclamation or post-closure maintenance or monitoring

RMMS requirements are applicable to LMC employees, contractors, and to any consultants and suppliers who work on site.

1.2 NEWLY ACQUIRED OPERATIONS

Newly acquired operations must conduct a gap assessment and evaluate their compliance with the RMMS standard and supporting HSEC performance standards and procedures. These operations must develop and implement a plan for coming into compliance with LMC standards within 18 months of acquisition. Corporate management must approve implementation plans and monitor progress towards compliance.

1.3 REQUEST FOR EXEMPTIONS

Operations may apply for temporary or permanent exemption from a specific RMMS standard requirement or HSEC performance standard. Requests must be in writing to corporate HSEC management and include:

- A detailed description and justification of the requested exemption;
- Whether the requested exemption is temporary or permanent;
- A risk assessment and description of alternative operational controls or measures that will be applied in place of the requirement; and
- A plan and timetable for transitioning to compliance if the exemption is temporary.

RMMS and HSEC exemptions must be jointly approved by the corporate executives responsible for health and safety, environment, and communities.

1.4 CORPORATE OFFICES AND EXPLORATION SITES

Specific HSEC processes will be established to support RMMS implementation at corporate offices, at regional offices and at exploration sites. These processes will be scaled to the nature of the facility, operational activities being undertaken, the operating environment, and relevant hazards and risks.

RMMS Requirement 2 – Responsible Mining Policy

INTENT

To establish and communicate a clear set of values, objectives and commitments essential to the effective management of HSEC performance.

REQUIREMENTS

2.1 IMPLEMENTING HSEC POLICY

Each operation must establish and implement an HSEC Policy consistent with LMC's Responsible Mining Policy and the RMMS. Each operation's policy must:

- Be approved by the operation's senior management;
- Be formally documented, implemented and maintained;
- Be effectively communicated to all personnel, including contractors and key stakeholders;
- Be made available to other interested parties;
- Adequately reflect the local conditions, including the type and magnitude of the operation's health, safety, environmental and community risks, as well as local regulatory requirements;
- Commit to the prevention of illnesses, injuries, environmental degradation and adverse community impacts;
- Reference compliance with applicable legal requirements and any other requirements voluntarily adopted by LMC;
- Require the establishment and review of performance objectives;
- Commit to providing ongoing HSEC training for all personnel;
- Commit to continual improvement in Responsible Mining and HSEC performance; and
- Be reviewed periodically and updated to adequately reflect changes to the operation.

2.2 ADOPTING THE LMC RESPONSIBLE MINING POLICY

Operations may choose to directly adopt the LMC Responsible Mining Policy for their own use as long as all conditions of RMMS Requirement 2.1 are met.

- The decision to adopt the corporate policy in lieu of a site-specific policy must be documented and approved by senior management.

RMMS Requirement 3 – HSEC Risk Management

INTENT

To ensure that HSEC hazards and aspects are identified, assessed and treated to prevent injuries and fatalities, and to mitigate the impact of adverse events on human health, the environment, communities and LMC.

REQUIREMENTS

3.1 RISK IDENTIFICATION

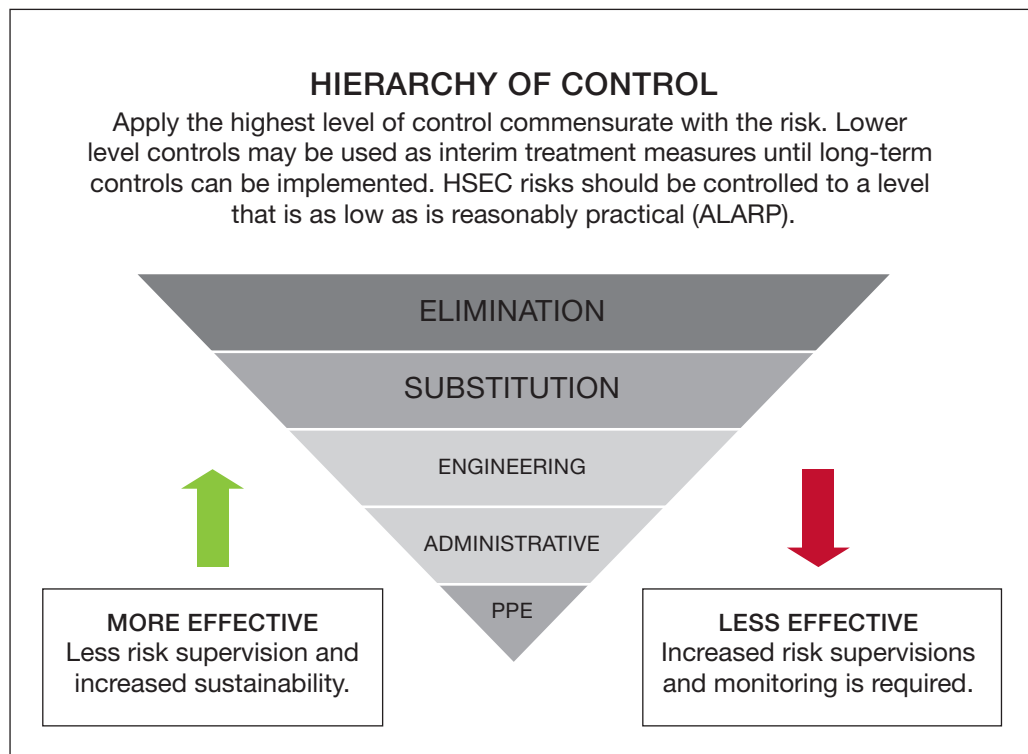
Each operation must establish a formal process to identify and assess HSEC hazards and environmental aspects that can create a risk exposure. All potential sources of HSEC risk should be considered. The process must be aligned to LMC's Risk Management Statement and conform to the corporate Risk Management Framework. The process must cover the following sources of risk:

- Health, safety and well-being of employees, contractors, visitors and local communities
- Quality of the environment
- Operational activities (normal operations, abnormal conditions, upsets, emergencies)
- Process safety
- Legal and regulatory compliance
- Reputation of the business and social licence to operate
- Operational continuity and asset protection
- Project management and delivery
- Workforce and personnel behaviours
- Financial performance and changes to OPEX / CAPEX that could impact RMMS and HSEC objectives

3.2 RISK TREATMENT AND HIERARCHY OF CONTROLS

Each operation must identify, document and implement appropriate controls to treat identified HSEC risk exposures. Every effort should be made to avoid HSEC risk exposure by managing sources of risk to levels that are as low as reasonably practicable (ALARP).

Risk treatment methods must follow the hierarchy of controls, and priority must be given to elimination, substitution and engineering risk reduction strategies over administrative, behavioural and personal protective equipment (PPE) controls.



Hierarchy of Control – This graphic presents the hierarchy of risk controls in order of most effective to least effective. The priority should always be to eliminate hazards whenever practicable. PPE should be a risk control of last resort.

3.3 RISK REGISTERS

Each operation must develop a risk register(s) for cataloguing HSEC risks and aspects as well as related controls. Individual risk registers can be developed for each HSEC discipline if appropriate for the operation. A competent person must be assigned responsibility for managing HSEC risk registers. HSEC risk registers must be reviewed and updated annually, or more often if required due to business or operational changes.

HSEC risks characterized as ‘Significant’ or ‘High’ must be reviewed by senior management on a quarterly basis. The purpose of the review must be to assess the effectiveness of current risk reduction strategies and controls, and to identify if additional treatment strategies are available.

HSEC risks characterized as High, and those with a potential for a ‘Catastrophic’ impact must be reported to corporate as part of the quarterly risk review and reporting process.

3.4 SAFETY RISKS AND FATALITY PREVENTION

Each operation must identify and document those risk exposures presenting the highest potential for fatality along with the critical controls required to prevent the occurrence of a fatal incident. These risk exposures and the related critical controls must be communicated to the workforce annually.

- Those risk exposures with the highest potential for fatality, due to the probability of incident occurrence and the magnitude of impact of incident occurrence, and other health and safety risk exposures with a potential ‘Catastrophic’ impact or consequence, together with the related critical controls, must be assessed at least once every two years using a quantitative or semi-quantitative methodology.

Each operation must develop and implement a list of ‘Life Saving Rules’. These rules must be linked to those risk exposures with the highest potential for fatality and related critical controls.

Each operation must develop and implement a pre-task hazard assessment (PTHA) process that supports hazard identification, control and elimination. This process must be applied to daily work activities.

3.5 HSEC RISK MATRIX

The following matrix is to be used for analyzing HSEC risks.

LMC HSEC RISK MATRIX					
Almost Certain (5)	Moderate	Significant	High	High	High
Likely (4)	Moderate	Significant	Significant	High	High
Possible (3)	Low	Moderate	Significant	Significant	High
Unlikely (2)	Low	Low	Moderate	Significant	Significant
Rare (1)	Low	Low	Low	Moderate	Moderate
LIKELIHOOD	Negligible (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
	Impact / Consequence Rating				

The following likelihood descriptors are to be used with the HSEC risk matrix.

LIKELIHOOD	DESCRIPTION
Almost Certain (5)	Frequent event (e.g., monthly)
Likely (4)	Expected to occur more than once a year
Possible (3)	Expected to occur several times in 5 years
Unlikely (2)	Expected to occur no more than once in 5 years
Rare (1)	Not expected to occur during the next 5 years

Note: Detailed consequence descriptors to support use of this matrix for evaluating HSEC risks are published as a separate reference document.

RMMS Requirement 4 – Change Management

INTENT

To ensure that the HSEC risks associated with changes to organization design and staffing, operating practices, technical processes or controls, introduction of new assets / equipment, introduction of new feedstock or chemicals, changes to plant or mine configuration, changed or modified OPEX / CAPEX budgets, or changes to technical drawings are managed.

REQUIREMENTS

4.1 CHANGE MANAGEMENT PROCEDURE

Each operation must have a formal process for identifying and managing change. This process must address changes that could affect the safety, health and well-being of people, the environment, the community, compliance, company reputation, or HSEC performance. The process must include the following:

- A method for the identification of hazards and analysis of the risks associated with the change.
- Criteria for identification and implementation of required controls to mitigate the risks.
- Use of an appropriate risk analysis methodology based on the complexity of the change.
- Hand-over from construction to operations during commissioning and ramp up of a project.
- A contingency to cover short-term emergency changes where a full change management process cannot be practically applied prior to a needed change occurring. Use of short-term emergency changes must be limited.
- A process for documenting recommendations, logging of required risk management and corrective actions, assignment of a responsible person, and tracking of actions until completion.

Changes covered by this requirement may be planned or unplanned; sudden or gradual; temporary or permanent.

4.2 CHANGE MANAGEMENT PROCESS REQUIREMENTS

The management of change requirement applies to the following types of change:

- Mine design and construction methods
- Mine planning and ground support
- Layout and architecture of mines, open pits and operating infrastructure
- Plant and equipment (except for direct replacements in-kind)
- Materials used, their composition and properties
- Feedstock used and by-products / wastes generated
- Drawings and engineered processes
- Operating, maintenance and emergency procedures
- Programmable electronic system control software
- Organization structure and responsibilities
- Personnel changes affecting training and competency requirements

- Changes to individual roles and responsibilities
- Work activity hand-over between contractors and LMC and vice versa
- Regulator and statutory requirements or changes impacting on permit / licence conditions
- Products and product compositions
- Changes to key suppliers, service providers, supply chain components
- Changes to OPEX / CAPEX that have the potential to impact HSEC performance

4.3 CHANGE MANAGEMENT APPROVAL

- All proposals for change must be evaluated and be approved prior to implementation. The review process must include an appropriate level of technical expertise and involve members of the workforce impacted by the proposed change.
- Change approval must be made by a person of the same level of authority as those who control the existing process or item being changed.

4.4 CHANGE MANAGEMENT AWARENESS AND COMMUNICATION

- Employees and contractors must be trained to identify what constitutes a change and how to initiate the change management process.
- All affected people must be formally notified of a change, planned timelines for the change, and the impact the change will have on their work activities.

4.5 CHANGE MANAGEMENT POST-CHANGE EVALUATION

- There must be a formal post-implementation review process to evaluate the change against intended impacts and to address the reasons for any deviation from the expected outcome.
- The process must capture any new hazards or risk exposures identified or created as a result of the change.

RMMS Requirement 5 – Legal & Other Requirements

INTENT

To ensure LMC operations comply with the applicable legal and other requirements including laws, regulations, orders, licences, permit conditions, commercial agreements and voluntary commitments.

REQUIREMENTS

5.1 MANAGING LEGAL AND OTHER REQUIREMENTS

Each operation must have a formal process for managing legal and other requirements. As part of the process, each operation must:

- Develop a centralized obligations register detailing the applicable legal and other requirements. The register should reference the source document for each legal and other requirement. A person should be identified and assigned responsibility for overall management of the obligations register.
- Identify the source documents that establish applicable legal and other requirements. These documents can include laws, regulations, licences, permits, internal and external standards, and formal and informal agreements. These documents should be maintained and be kept up to date as part of the local RMMS.
- Define responsibilities and accountabilities for maintaining compliance or conformance to each requirement.
- Keep the obligations register up to date by conducting routine function-specific and cross-functional reviews of the register. The register should include current key dates for renewal applications and other reporting requirements.
- Monitor regulatory trends to anticipate and identify changes to the source documents, legal and other requirements, and site operations.
- Update the obligations register whenever a legal or other requirement changes.
- Understand how legal and other requirements apply to each aspect of the operation's activities and communicate these requirements to all persons responsible for compliance, or those whose activities affect compliance, including suppliers and contractors.
- Develop and implement specific action plans for maintaining compliance with the legal and other requirements as required.

RMMS Requirement 6 – Improving HSEC Performance

INTENT

To ensure that objectives and targets consistent with the RMMS are established to support continual HSEC improvement across LMC operations.

REQUIREMENTS

6.1 SETTING PERFORMANCE OBJECTIVES

Each operation must develop and implement a strategic long-term (five-year) HSEC plan with defined objectives and targets that demonstrate achievement of:

- Responsible Mining Policy objectives;
- Effective prevention and / or mitigation of significant HSEC risk exposures;
- Compliance to legal and other requirements; and
- Continual improvement of the RMMS implementation and HSEC performance.

Objectives and targets must be aligned to corporate HSEC long-term objectives and targets.

Plans must be approved by Senior Management with copies provided to corporate HSEC.

Plans must be reviewed annually and be updated every second year or more often if needed.

Where provided, reward and incentive schemes must be designed such that HSEC performance is not compromised to maximize financial reward.

6.2 ACHIEVING PERFORMANCE IMPROVEMENT

Each operation must develop annual HSEC improvement action plans. The plans must include:

- Key tasks, improvement activities and the leading and lagging key performance indicators (KPIs) to be monitored;
- Assignment of accountabilities and responsibilities for execution of plan tasks and activities;
- Identification of resources required (human and financial) to successfully implement the plans; and
- Key milestones and a timetable for achieving plan objectives.

Plans must be aligned to relevant One Page Plans (OPPs) and annual corporate HSEC action plans.

Plans must be approved by Senior Management with copies provided to corporate HSEC.

Annual HSEC improvement plans must be communicated to the workforce.

Plans must be reviewed quarterly to track progress against objectives.

Note: Long-term and annual plans can be unique to each HSEC function (i.e., health and safety, environment, communities) or can be combined as a single HSEC plan.

RMMS Requirement 7 – Responsibilities & Accountabilities

INTENT

To ensure that HSEC responsibilities and accountabilities are established, and that the resources necessary for developing, maintaining and continually improving RMMS and HSEC performance are provided.

REQUIREMENTS

7.1 CORPORATE RESPONSIBILITIES

Corporate HSEC is responsible for:

- Overall ownership of the Responsible Mining Management System and HSEC commitment through the appointment of an RMMS Leadership Committee;
- Defining the roles, responsibilities and delegated authorities necessary to effectively implement and maintain the RMMS at each operation and each level of the organization;
- Documenting and communicating required roles, responsibilities and authorities to all affected personnel (internal and external);
- Regularly reviewing and updating required roles, responsibilities and authorities; and
- Committing required resources to effectively administer and support RMMS and HSEC activities.

7.2 OPERATIONAL RESPONSIBILITIES

Each operation is responsible for:

- Designating a member of operational management with overall accountability for RMMS implementation and conformance;
- Defining required operational roles, responsibilities and authorities for managing RMMS and HSEC activities;
- Documenting and communicating role definitions, HSEC responsibilities and authorities to all personnel, including contractors;
- Ensuring that all members of the workforce know and understand their personal responsibilities and authorities with respect to HSEC;
- Regularly reviewing and updating roles, HSEC responsibilities and authorities as required or when there are changes to the organization;
- Committing and allocating adequate resources to support RMMS and HSEC requirements; and
- Establishing cross-functional workforce committees to support and oversee effective implementation of RMMS and HSEC systems and processes.

RMMS Requirement 8 – Awareness, Competency & Training

INTENT

To ensure that the workforce is hazard aware, trained and competent to safely and effectively carry out assigned work in accordance with the RMMS and applicable internal and external HSEC requirements.

REQUIREMENTS

8.1 GENERAL

Each operation must have a formal process to support the development of workforce HSEC awareness, the delivery of training, and testing for competency and qualification. The process must address:

- An introduction to general HSEC requirements, rules, hazards, risks and required controls;
- Training on legal and other requirements relevant to each person's role;
- Task training on operational procedures (SOPs), safe work practices and equipment operation;
- Awareness training on fatality hazards and required critical controls;
- Training on required emergency and evacuation procedures;
- Special training for fatality hazards and HSEC critical roles; and
- Technical qualification and licensing for roles or occupations with specific requirements.

8.2 TRAINING MATRIX AND TRAINING NEEDS ASSESSMENT

Each operation must develop an HSEC training matrix for each role in the workforce. The matrix must be based on a training needs assessment that considers the following:

- Workforce experience, education, language and literacy
- Training objectives
- Legislative or regulatory training requirements, mandates or qualification criteria
- Methods of instruction (i.e., classroom instruction, hands-on experience, on the job training)
- Difficulty or complexity of subject matter or required competency
- Degree of risk or HSEC hazards associated with the work
- Required operational controls
- Availability and suitability of required training materials
- Trainer qualifications and availability of qualified technical trainers (internal or external)
- Testing / methods of competency evaluation
- Requirement for periodic refresher training and re-testing

Each role must have a defined period for re-evaluation, re-training or re-testing

Training needs assessments must be reviewed once every two years or more often when there are significant changes to the organization, operation, processes, materials, equipment, risk or legislation / regulation.

8.3 HIGH HAZARD AND HSEC CRITICAL ROLES

Each operation must develop a list of all roles identified as high hazard or HSEC critical. Detailed training and competency qualifications must be established for these roles.

8.4 TECHNICAL QUALIFICATIONS AND LICENSING

Each operation must develop a list of all roles requiring technical certification, registration or official licensing. The mandatory qualification(s) / competencies must be maintained for all personnel performing such roles.

8.5 HSEC AWARENESS TRAINING (INDUCTION)

All new employees and contractors must undertake HSEC awareness training (induction). The training must address the following topics:

- Introduction to the Responsible Mining Policy or equivalent site policy
- Basic HSEC hazard awareness
- A review of fatality hazards, Life Saving Rules and basic safety rules
- A review of basic PPE requirements
- Significant HSEC risks related to their role, work area or activity
- Personal HSEC responsibilities (including any specific legal or other requirements)
- Relevant operational rules, standards and procedures
- Incident notification, evacuation and emergency management procedures
- Potential consequences of not adhering to HSEC rules, standards and procedures

Induction training must be completed before employees and contractors commence any work activities.

Awareness refresher training must be provided at appropriate intervals for all personnel at least once every two years.

8.6 HSEC AWARENESS TRAINING FOR VISITORS, VENDORS, DELIVERIES, CONSULTANTS AND VIPS

All visitors, vendors, delivery drivers, consultants and VIPs, even if escorted, must receive basic HSEC awareness training (i.e. visitor induction) prior to entering operating areas or beginning any consulting work activities. This requirement applies even if the consulting work is limited to office or administrative buildings. Visitor induction must include a review of relevant emergency and evacuation procedures and any other topics appropriate for the areas to be visited, the work to be done and any potential exposures to risk. This training must be renewed annually.

8.7 DOCUMENTATION OF HSEC AWARENESS TRAINING

Each operation must have a process for documenting completion of HSEC awareness training and for tracking and confirming that personnel allowed on site have been trained and are qualified per requirements 8.5 and 8.6.

RMMS Requirement 9 – Communications & Stakeholder Engagement

INTENT

To ensure that processes are established to effectively communicate, consult and engage with internal and external stakeholders on all matters related to HSEC.

REQUIREMENTS

9.1 COMMUNICATION PROCEDURE

Each operation must have a formal process for managing internal and external communications. The process must address communications and consultation related to the Responsible Mining Policy, the RMMS, HSEC objectives and targets, risks and impacts, operational controls, emergency and crisis management, and performance. The process must address:

- Internal communication within the operation, with corporate and across LMC;
- Communication with site visitors and contractors;
- Communication with external stakeholders, including receiving and responding to requests; and
- Establishment and maintenance of a mechanism for external stakeholders to confidentially report grievances and concerns.

The process must be reviewed annually and be updated as required.

9.2 INTERNAL COMMUNICATIONS

The internal communications process must ensure that HSEC performance, successes, issues and concerns are included as regular line items on Senior Management, departmental, staff and team meeting agendas.

The internal process must ensure that employees and contractors:

- Are informed and consulted with about relevant HSEC matters at the site and across LMC;
- Are encouraged to participate in continuous improvement activities; and
- Understand how to make suggestions for improvement.

The internal communications and consultation processes must include the following components:

- HSEC improvement suggestion system.
- HSEC hazard and concerns reporting system.
- The use of HSEC shares prior to the start of meetings.
- Supervisory shift hand-over meetings, which include sharing of HSEC issues, concerns or risks that must be addressed by the oncoming shift.

- Pre-shift HSEC discussions as part of line-out / shift-change activities.
- Monthly team or department HSEC meetings.
- Health and safety committee(s) that represent workers and management. Committees must be structured in accordance with any local legislative requirement. Committee(s) should be scheduled to meet at least monthly.
- HSEC information boards located strategically throughout each operation. Boards must be orderly and the information must be kept current. Information boards should cover relevant HSEC topics for the operation and must also include information when provided by corporate HSEC.

9.3 STAKEHOLDER ENGAGEMENT

Each operation must have a Stakeholder Engagement Plan. The plan must include:

- A listing of internal and external stakeholders;
- Classification of internal and external stakeholders and their relevant interest in issues related to:
 - Occupational health and safety;
 - Environmental quality; and
 - Community impacts, socioeconomic development, and other aspects of social performance;
- Stakeholder engagement scope, targets, objectives and responsibilities;
- Expected stakeholder engagements or participation in RMMS activities;
- A strategy for sharing HSEC performance results and significant risks (current or future);
- Extent of information planned for disclosure to external stakeholders, including limitations;
- Methodology, timing and scope of engagement with external stakeholders; and
- Methodology for documentation of stakeholder engagement activities and results.

Objectives and targets must be aligned to Corporate Social Responsibility (CSR) objectives and targets.

The plan must be approved by Senior Management with copies provided to corporate HSEC.

The plan must be reviewed annually and be updated as needed.

9.4 CUSTOMER ENGAGEMENT

There must be a process for communicating information regarding product risks (including statutory and regulatory requirements) and recommended treatment strategies (when applicable) with customers and interested stakeholders.

RMMS Requirement 10 – Controlling Operational Activities

INTENT

To ensure that required operational controls are established and implemented to effectively manage the HSEC risks associated with operations and related business activities.

REQUIREMENTS

10.1 OPERATIONAL CONTROL

Each operation must have a formal process for establishing and implementing HSEC rules, safe work procedures (SWPs), safe work permit systems and standard operating procedures (SOPs) to effectively manage the HSEC risks associated with routine work activities. LMC HSEC performance standards and procedures, legal and other requirements (including permits and licences), and operational risk registers must serve as the basis for developing HSEC rules, permits and procedures.

Required risk controls must be documented as part of SWPs and SOPs. Controls should not only address health and safety risks, but include any controls necessary to ensure compliance with applicable permits and licences, and regulatory or legal requirements.

The process must ensure that every effort is made to avoid HSEC risk exposure by controlling risks to levels that are as low as reasonably practicable (ALARP) in line with the hierarchy of controls (see Requirement 3.2). Priority must be given to elimination, substitution and engineering risk reduction strategies over use of administrative, behavioural and PPE controls.

The process must address special measures to control risks associated with new or non-routine work.

Rules, permits and procedures must be communicated to the workforce, and must be readily accessible and available for review and use.

Rules, permits and procedures must be kept current and must be reviewed and updated periodically.

10.2 HEALTH AND SAFETY PROGRAM REQUIREMENTS

Each operation must establish and maintain a health and safety management program that includes formal procedures and processes that address the following:

- Pre-task hazard identification, hazard assessment and risk control
- Fatality hazard identification, assessment, control and Life Saving Rules
- Safe Work Permit Systems
- Workplace housekeeping and management of unsafe conditions

- The right to refuse unsafe work
- Use of personal protective equipment (PPE)
- Energy isolation and lockout / tagout
- Electrical safety
- Confined space entry
- Working at heights
- Operation of mobile equipment
- Ground control and support
- Cranes, lifting and rigging
- Explosives management
- Hot work
- Machine guarding and machinery safety
- Operation of remote control mining equipment
- Contractor safety qualification and performance management
- Reporting and classification of health and safety incidents, injuries and illnesses

10.3 ENVIRONMENTAL PROGRAM REQUIREMENTS

Each operation must establish and maintain an environmental management program with formal procedures and processes that address the following:

- Hazard / impact identification and risk control
- Air quality management
- Water management
- Reclamation and closure
- Habitat and biodiversity management
- Liquids, effluents, seepage and spills
- Waste management
- Greenhouse gases and energy efficiency
- Noise and vibration
- Environmental social impact assessment
- Environmental permitting and compliance management
- Environmental baseline studies
- Reporting and classification of environmental incidents

10.4 COMMUNITY PROGRAM REQUIREMENTS

Each operation must establish and maintain a social performance governance program with formal procedures and processes that address the following:

- Hazard identification specific to local communities and risk control
- Social impact management, social risk classification and reporting
- Community health and safety
- Local, regional and national stakeholder engagement
- Community investment (to include annual budgeting with distinction between community investments, stakeholder engagement, CSR communications and CSR administration)
- Local recruitment and procurement
- Ethical code of conduct, equal opportunity, diversity and inclusion
- Mechanisms for employees and stakeholders to confidentially report grievances and concerns
- Mechanisms for documenting and tracking the fulfillment of commitments made to stakeholders
- Social aspects of mine closure (when operations are scheduled to undertake closure within 7 years)
- Resettlement management, population influx, security and human rights (when identified as risks)
- Indigenous peoples engagement, economic inclusion and culture heritage conservation (when operations directly or indirectly impact Indigenous Peoples)
- Reporting and classification of social incidents and operational disruptions due to stakeholder unrest

10.5 PERFORMANCE STANDARDS AND PROCEDURES

Operations must implement additional mandatory HSEC requirements when outlined in performance standards or procedures issued as supplements to the RMMS.

RMMS Requirement 11 – Crisis & Emergency Response

INTENT

To ensure that processes are established to protect personnel, to minimize business disruption, and to mitigate negative impact to the community, the environment and assets in the event of an emergency.

REQUIREMENTS

11.1 CRISIS MANAGEMENT PLANNING

Each operation must have a Crisis Management Plan (CMP) that complies with the requirements of the Lundin Mining Crisis Management Standard.

The following table establishes the criteria for evaluating an event or incident to determine whether it should be classified as an emergency or a crisis.

EMERGENCY	CRISIS
Incidents that result in an occupational injury with short term minor to moderate impact only.	Incidents that result in severe, disabling or disfiguring injury; overnight hospitalization; loss of life, or; imminent or potential loss of life.
Minor spills, releases or emissions with no significant or long lasting environmental damage.	Environmental incidents with actual or potential for long lasting environmental damage; environmental ecosystem effects; property or asset loss, or that result in significant public awareness.
Incidents with no media attention, or no more than local low level local media interest.	Incidents with the potential to attract regional, national or international media interest.
Incidents that result in minor or moderate damage to equipment, minor loss of an operating asset, or a business impact of less than US\$25m.	Incidents that could result in loss of property or a significant assets or that could have a business impact greater than US\$25m.
Incidents with no potential for significant legal ramifications.	Incidents with the potential for significant legal ramifications.
Incidents that are localized and unlikely to have an impact on other Lundin sites.	Incidents that could have a negative impact on other Lundin Mining sites.
Incident that could result in short term business interruption (less than two days of production loss).	Incidents that could result in significant business interruption (more than two days of production loss).
Incidents that could result in short term localized reputational impact.	Incidents that could result in medium to long term reputational impact to a LMC site, Lundin Mining Corporation or the Lundin Group.

11.2 EMERGENCY RESPONSE PLANNING

Each operation must have an Emergency Response Plan (ERP) appropriate to the size, complexity and risks of the site(s). The ERP must include:

- A listing of potential emergency incidents – including internal and external incidents potentially involving hazardous materials transportation;
- Emergency response scenarios that address potential emergency incidents;
- Emergency response protocols that outline the rules of engagement for incident responders;
- A listing of trained and qualified emergency response personnel;
- A listing of available emergency response equipment; and
- A listing of available support resources (internal or external).

The ERP must be shared with stakeholders who are involved with emergency response planning, including local emergency response services, contractors and affected communities.

Each operation must have suitably trained and qualified emergency first-responders.

Where there is significant risk, or local emergency response services are not available or qualified to respond to site emergencies, operations must establish formally trained, qualified and properly equipped Emergency Response Teams (ERTs) or underground Mine Rescue Teams (MRTs).

11.3 MAINTAINING READINESS

- The ERP must be reviewed at least annually and be updated as needed.
- The ERP must be tested annually using drills or desktop exercises. The results of drills and exercises must be documented to include any lessons learned and actions taken to improve the ERP.
- All personnel including visitors must be trained in the site emergency notification, response and evacuation procedures. Refresher training must be provided annually. This training must be documented.
- Fire and evacuation drills must be conducted annually. All underground personnel must participate in a mine evacuation drill at least once every 18 months. The results of fire and evacuation drills must be documented to include any lessons learned and any actions taken to improve the ERP.
- ERT and MRT team members must attend frequent training and be tested for competency annually.

11.4 RESPONDING TO EMERGENCY INCIDENTS

Site emergency systems must be installed and maintained in an operational state of readiness at all times.

- Emergency systems must be installed and maintained in accordance with OEM recommendations and guidelines.
- Emergency systems must be maintained such that they meet all applicable local regulatory, legislative, permitting and / or certification requirements.
- These systems must be subject to a formal inspection and preventive maintenance program.
- Emergency systems covered under this requirement include emergency lighting; smoke, fire, gas and chemical detection; firefighting and suppression equipment and sprinklers; emergency alarms; refuge chambers; emergency response PPE; spill response equipment; and pollution prevention controls.

RMMS Requirement 12 – Incident & Action Management

INTENT

To ensure that incidents are reported and investigated, that lessons learned are shared, and that appropriate corrective and preventive actions are identified and communicated.

REQUIREMENTS

12.1 INCIDENT AND NONCONFORMANCE REPORTING

Each operation must have a formal process for reporting and managing HSEC incidents and detecting HSEC nonconformities. The process must address recording, investigating, analyzing, communicating to relevant people and groups, sharing of lessons learned, and taking appropriate corrective and preventive actions to mitigate HSEC risks and to prevent recurrence of similar events.

Any incident that meets the LMC definition of a 'Crisis' must be immediately reported to corporate management and must be managed in accordance with the site Crisis Management Plan.

The process and reporting timelines must follow corporate HSEC incident reporting and classification requirements in published HSEC performance standards.

The process must ensure that all external reporting obligations are met when an incident or nonconformance occurs that requires regulatory, governmental or external stakeholder notification.

12.2 INCIDENT, NONCONFORMANCE AND ACTION MANAGEMENT

Incident and nonconformance management processes must meet the following criteria:

- Incidents and nonconformances must be promptly reported and investigated.
- Injuries must be reported to supervision before the end of the shift that they occur on.
- A responsible person must be identified to investigate each incident or nonconformance.
- Incidents and nonconformances must be evaluated for significance (actual and potential).
- All incidents and nonconformances must be investigated to determine basic cause.
- Significant incidents must be investigated to determine root cause using an approved methodology.
- Investigation results must be analyzed to identify RMMS and HSEC system gaps, unidentified risks, trends, lessons learned, and opportunities to improve HSEC controls.
- Corrective and preventive actions must be identified, documented and assigned to a responsible person. Implementation of corrective and preventive actions must be tracked to completion.
- Upon completion, corrective and preventive actions must be assessed to determine effectiveness.
- Results from the incident investigations and lessons learned must be shared across the operation.
- Results from the investigation of significant incidents must be shared across LMC.
- Incident and investigation details must be documented with records maintained for reference.
- Incident and nonconformance statistics must be reported to corporate HSEC as part of monthly, quarterly and annual reporting.
- HSEC rules, permits and procedures must be updated as needed to reflect incident and nonconformance investigation findings and lessons learned.

RMMS Requirement 13 – Managing Contractors & Suppliers

INTENT

To ensure that the hazards and risks associated with the procurement of contracted services, labour, equipment and material are effectively managed.

REQUIREMENTS

Each operation must have a formal process for managing the risks associated with the procurement of contracted services, labour and equipment, and the purchase of supplies and materials.

The process must ensure the goods and services are not procured from suppliers that utilize indentured personnel or child labour or that have a record of poor safety and environmental performance.

13.1 CONTRACTED SERVICES, LABOUR AND EQUIPMENT

For contracted services and labour, the process must include the following provisions:

- **Scope of Work** – A written scope of work must be prepared that identifies potential HSEC hazards and risks associated with the planned work or activity.
- **Bid Process** – Contractor bid documents must include an HSEC action plan that lists the controls that will be implemented to manage the risks and prevent an HSEC incident or injury during the work.
- **Contractor Selection** – Selection criteria for qualification of contractors must include HSEC culture, commitment to safety, past HSEC performance (on and off site), and technical capability to perform the work. *Bidders must not be selected solely based on low cost or schedule.*
- **Accountable Person** – For each contract, an accountable person must be identified with responsibility for contractor oversight and performance.
- **Tools and Equipment** – Contractor tools and equipment must be well maintained, must be in safe condition, and must be compliant with site, legislative, regulatory, permitting, certification and licensing requirements. Current certificates of inspection must be provided for contractor cranes and personnel hoisting equipment.
- **Chemicals and Hazardous Materials** – Contractors must submit safety data sheets (SDSs) or product specification documents for review and approval by the relevant Lundin Mining HSEC professional prior to bringing any chemicals or hazardous materials onto Lundin Mining property.
- **Induction** – Contractor personnel must receive induction training before beginning work. See MS Requirement 8.5.
- **Training** – Contractor personnel must be trained and qualified (certified and licensed when required) for the tasks or activities that they will be assigned to perform.
- **Compliance with Standards** – Contractor activities must be conducted in accordance with site and LMC HSEC standards and procedures.
- **Insurance Coverage** – Contractors must provide proof of insurance that provides appropriate evidence of coverage for workers' compensation and general liability (based on the scope of work).
- **Legal Compliance** – Contractor activities must be performed in accordance with site permits and licences, and in compliance with local legislative and regulatory requirements.
- **Incident Reporting** – Contractor incidents must be reported and classified in accordance with site and LMC HSEC reporting requirements.
- **Post-work Performance Evaluation** – Contractor HSEC performance must be evaluated and a record of performance kept for use in future contractor selection processes.

13.2 TEMPORARY AND CASUAL LABOUR CONTRACTORS

For HSEC purposes, individuals engaged on a temporary or casual basis (such as summer employees, interns or temporary help) must be inducted and managed following the same process used for full-time employees.

13.3 PURCHASE OF PLANT, EQUIPMENT AND MATERIALS

There must be a process to identify, evaluate and control the hazards and risks associated with the planned purchase of plant, equipment and materials.

The process must ensure that the following are evaluated prior to issuing any purchase contract:

- Site and LMC HSEC requirements or restrictions intended to reduce or eliminate HSEC risk due to:
 - Machinery and equipment operating hazards
 - Environmental emissions or spills
 - Prohibited substances and high hazard chemicals
 - Occupational health exposures
 - Noise and vibration
 - Fire and explosion
 - Safe access
- Legislative and regulatory requirements or restrictions
- Restrictions or limitations due to permits or licences
- Operational design criteria or product specification consistent with intended use
- Operational performance requirements
- Other required operational controls and safeguards
- Hazardous characteristic that may affect safe storage, handling and use
- Hazardous characteristics or lack of controls that could increase the risk of an underground fire
- Characteristics that may affect production processes or product quality
- Opportunity to purchase substitutions and alternatives for hazardous materials
- Risks related to purchasing low cost / lower quality substitutions for engineered goods
- Quality control and inspection of received equipment and materials
- Required employee notifications or training
- End of life-cycle / end of use recycling or disposal limitations or restrictions

RMMS Requirement 14 – Document Control & Recordkeeping

INTENT

To ensure that RMMS and HSEC documents, records and data are correctly managed.

REQUIREMENTS

14.1 RMMS AND HSEC DOCUMENTATION

Each operation must have a formal process for managing RMMS and HSEC documentation. This process must govern all documents required by the RMMS to maintain effective and efficient HSEC systems.

Each operation should develop a listing of all documents to be managed under the process.

14.2 CONTROL OF HSEC DOCUMENTS, RECORDS AND DATA

Each operation must have an HSEC document control procedure. The procedure must ensure that HSEC documentation, records and data are:

- Readily identifiable, current, locatable and easily accessible to relevant individuals;
- Suitably secured;
- Created, modified and approved for adequacy and use by an authorized person;
- Periodically reviewed and, when necessary, revised;
- Legible, dated and version controlled with tracked changes;
- Distributed appropriately to internal and external audiences based on business need;
- Identified as obsolete when superseded to guard against unintended use;
- Retained for legal and / or knowledge preservation purposes when required; and
- Destroyed or disposed of properly when retention is no longer required.

14.3 MANAGEMENT OF HISTORIC HSEC RECORDS

Each operation must have a formal process to maintain historical records related to HSEC activities. Historical records must be maintained in secure locations and be protected from damage, deterioration and loss.

Historical HSEC records must be stored in a manner that allows them to be readily accessible when needed for reference, audit or compliance purposes.

The confidentiality and security of HSEC documents, records and data must be maintained relative to their source and business sensitivity, and in compliance with applicable data privacy protection legislation.

Records containing personal medical information collected as part of occupational health surveillance programs must be kept separate from employee personnel (HR) records, must be kept confidential, and should be managed by a medical or occupational health professional.

The process must comply with site and LMC Document Retention Policy requirements.

RMMS Requirement 15 – Assessing Performance & Auditing

INTENT

To ensure that RMMS performance is assessed, recorded, tracked, and analyzed to assure system effectiveness and to verify operational adherence to RMMS requirements.

REQUIREMENTS

15.1 INSPECTING, MONITORING, MEASURING AND EVALUATING

Each operation must have a formal process for regularly inspecting, monitoring, measuring and evaluating key HSEC performance parameters. The process must assess:

- Effectiveness of key HSEC operational controls to mitigate risks and impacts;
- HSEC performance against objectives and targets (including leading and lagging indicators);
- Compliance with legal and other obligations;
- General workplace conditions (housekeeping and hazard control);
- Monitoring and performance against environmental permit and licence requirements;
- Monitoring occupational health exposures against internal and regulatory limits; and
- Employee health and wellness monitoring including pre- and post-employment examination.

The process should include identification of key parameters to be measured and tracked, methods for calibrating monitoring equipment, data formatting requirements, and methods for assuring data quality.

Results must be shared with senior management, and with the workforce as appropriate.

Workplace exposure and employee health monitoring results must be shared with participating people.

Performance deviations must be recorded and promptly reported to senior management, and corrective actions taken. Significant deviations and nonconformances must be reported to corporate HSEC.

15.2 AUDITING

Each operation must have a process for conducting formal audits to evaluate the effectiveness of HSEC controls. The process must check for compliance and conformance with the RMMS, with HSEC performance standards and procedures, and with legal and other requirements.

- Operations must develop an annual audit schedule that details the types of audits planned (internal / external), location of the audits, focus areas and topics to be covered.
- Audits must be conducted using approved LMC HSEC audit protocols, or an approved external protocol (e.g., ISO, OHSAS, etc.).
- A report of audit findings must be produced and provided to senior management.
- Formal corrective actions must be developed and implemented for audit findings.

Operations will be subject to a comprehensive corporate (external) RMMS / HSEC audit at least once every two years. Corporate RMMS / HSEC audit frequency and focus will be based on assessment of performance and risk.

Operations will be subject to periodic corporate HSEC 'spot-check' or 'focus topic' audits based on an assessment of performance, risk or corporate initiatives.

RMMS Requirement 16 – Management System Review

INTENT

To ensure that the RMMS and related HSEC processes are efficient and effective and that they support internal and external objectives.

REQUIREMENTS

16.1 CORPORATE REVIEW

Corporate management is responsible for conducting an annual review of the Responsible Mining Policy and RMMS to assess overall system effectiveness. The corporate review will take into account:

- Corporate operational circumstances and anticipated changes;
- Current and emerging global HSEC trends;
- Changes to the organization's legal and other requirements;
- Input from key internal and external stakeholders;
- Overall HSEC performance against objectives, targets and performance indicators;
- Results of annual operational reviews and internal audits of operations; and
- Follow-up from previous reviews.

16.2 OPERATIONAL REVIEW

Each operation must have a formal process for conducting an annual review of the HSEC processes established to meet the RMMS requirements.

The process must be led by a member of senior management and consider the following:

- Changes in operating conditions and the risk profile of the operation
- Objectives, targets and performance indicators
- Workplace occupational health, environmental and medical monitoring results
- Changes to the operation's legal and other requirements
- HSEC performance statistics
- Stakeholder engagement results, including employee and customer feedback
- Incident investigations and the effectiveness of corrective and preventive actions taken
- Results of inspections, monitoring and performance evaluations
- Follow-up from previous reviews

16.2 OPERATIONAL REVIEW

Records of completed Corporate and Operational RMMS reviews must be retained and must include:

- Identified opportunities for improving RMMS and HSEC process effectiveness
- Actions taken to update or improve RMMS or HSEC processes
- Methods used for sharing the results of the review(s) with internal and external stakeholders

Glossary & Definitions

Accountability: The person who is ultimately answerable for HSEC activities or performance related to a particular system or process requirement. Accountability cannot be delegated.

Audit: A systematic, independent and documented process for obtaining objective evidence and evaluating it for conformance to policies, standards, procedures or other requirements.

Authority: The power to assign responsibility and commit resources.

Awareness: Being conscious of, or focusing attention on, a topic or issue.

Competency: Capability or fitness to perform a role or activity.

Crisis: A crisis is a sudden event or escalating issue, even if not directly linked to Lundin Mining Corporation (LMC) that may significantly affect LMC's reputation and / or ability to carry out its business. A crisis requires immediate Corporate notification, support and / or action.

Contractors & Suppliers: Vendors and suppliers of goods and services who work at an operation or site and who physically enter property owned or managed by LMC.

Document: A written set of specifications such as a standard, guidance, contracts, blueprints, permits, forms or procedures. Formal documents are generally subject to a review, approval and revision process.

Effective: An implemented system, process or procedure is fully implemented and / or operational and is delivering desired outcomes.

Engagement: Collaboration to address topics of mutual concern through disclosure of information, consultation and participation.

Formal: See Formal Process.

Formal process: A formal process requires that clear and precise requirements be established to guide and direct work activities. Formal processes should be documented and auditable, and be supported by written procedures.

Guidance: A suggested methodology or approach for conducting an operation or activity consistent with the Policy.

Hazard: A hazard is any source of potential damage to equipment or processes, personal harm (injury), adverse health effect, or environmental impact. When referred to in relation to occupational health and safety, the most commonly used definition is 'risk is the likelihood that a person may be harmed or suffer an adverse health effect if exposed to a hazard.'

Hazard identification: A subjective process used to identify hazards in the workplace and possible situations where people may be exposed to personal harm (injury) or adverse health effects (illness or disease), where damage to equipment or processes could occur, or where a negative impact to the environment could result.

HSEC critical role: An HSEC critical role is any position where ill health, fatigue, lack of training or lack of due diligence may compromise an individual's ability to undertake an assigned task involving exposure to a fatality hazard or environmental control properly, thereby posing a significant risk to the health and safety of others or unacceptable risk to the environment, community or operation.

Incident: Any event or occurrence that has resulted in, or has the potential to result in adverse consequences to people (injury or illness), the environment, the community, or to property. This includes significant deviations from standard operating procedures.

Injury: Any temporary or permanent damage to tissue, muscle or bone. Injuries are typically caused by an identifiable event.

Key parameter: A significant measure or indicator of performance.

Legal requirements: Requirements that have the legal force of a governmental authority (including international, national, regional or local), such as laws, regulations, orders, licence and permit conditions, and other conditions of government approval.

Near Miss: An unplanned event or occurrence that did not result in injury, illness, or significant damage – but had the potential to do so. Hazard reports generally are not considered near misses.

Nonconformance: Failure to comply with an RMMS requirement.

Objective: A goal that the operation intends to meet in the future that is quantifiable, where practicable.

Occupational Injury: An injury that results from work related activities occurring in locations under the control of Lundin Mining, or where the work is under the direction of the Lundin Mining or an authorized contractor, regardless of location.

Operation: A property operated by Lundin Mining Corporation, whether for exploration, project development, mining, mineral processing, reclamation or closure. An operation may consist of one or more physical locations called sites.

Operational control: A measure or action implemented to eliminate or mitigate / treat a risk.

Other requirements: Non-legal commitments, such as: voluntary adherence to international or national standards and guidelines; commitments made in licence and permit applications (including Environmental Impact Assessments [EIAs]) that are not considered legal conditions of approval; and non-commercial agreements, oral or written, reached with communities and other parties (commercial contracts are excluded from this Standard).

Policy: A set of fundamental operating commitments established by top management.

Procedure: A documented description of the process steps for performing a task, activity or function.

Process: See Formal Process.

Record: Data, report or other type of record demonstrating results achieved or activities completed.

Resources: The combination of personnel, specialized skills, organization, technology and financial allocation.

Responsibility: The obligation to perform a job, task or activity in order to achieve a stated objective by utilizing the resources that are made available. Responsibilities must be clearly communicated so that expectations are understood and acted upon correctly.

Risk: The product of the likelihood and consequence of occurrence of an adverse event or impact.

Risk analysis: A process that is used to understand the nature, sources and causes of the risks that you have identified and to estimate the level of risk. It is also used to study the impacts and consequences and to examine the controls that currently exist.

Risk assessment: Systematic analysis and classification of the level of risk associated with each identified hazard or other source of risk (ISO 31000 – A process that is, in turn, made up of three processes: risk identification, risk analysis and risk evaluation).

Risk evaluation: A process that is used to compare risk analysis results with risk criteria in order to determine whether or not a specific level of risk is acceptable or tolerable.

Risk identification: A process that is used to find, recognize and describe the risks that could affect the achievement of objectives.

Risk mitigation: Reducing the likelihood or consequence of a risk.

Role: A job function with specific tasks and objectives assigned to it.

Senior management: For the purposes of RMMS, senior management refers to the most senior level of management at an operation.

Significant Incident: Any incident that results in a critical injury; injuries to multiple people; any fire underground; any entrapment of personnel; a major fall of ground that impacts ventilation or access, or; the loss of a major asset. Significant incidents include those HSEC events with actual or potential to impact shareholder / investor support, cause a sustained loss of production, put customer commitments at risk, impact project timing / cost, impact public / community support; attract significant media attention; result in undesired regulatory impact (such as penalties, fines, permitting implications / delays, or legal action), or; that could have a material impact on LMC.

Stakeholder: Individual or group that is affected by the organization, or that can affect the organization. Includes: owners; employees; contractors; suppliers and service providers; communities and defined groups within communities; regulators and other government agencies; and non-government organizations.

Standard: A description of mandatory minimum requirements for conducting an operation or activity consistent with the Policy.

System: A collection of processes and procedures that collectively provide a framework for ensuring that tasks and activities are performed correctly, consistently and effectively to achieve a specific outcome or to meet defined objectives.

Target: A specific measure associated with an objective that would provide verifiable evidence of achieving the objective.

Training: A process of developing awareness and competency.

Workforce: Refers to all personnel who work at an operation including contractors.

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