
GRAMA

GROUPE DE RECHERCHE SUR LES ACTIVITÉS MINIÈRES EN AFRIQUE
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**RÉSULTAT DU QUESTIONNAIRE SUR LA RESPONSABILITÉ
SOCIALE DES ENTREPRISES : ENQUÊTE SUR LES COMPAGNIES
MINIÈRES CANADIENNES AYANT DES ACTIVITÉS EN AFRIQUE**

Mars 2003

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PRÉSENTATION DE L'ENQUÊTE SUR LES COMPAGNIES MINIÈRES CANADIENNES AYANT DES ACTIVITÉS EN AFRIQUE¹

Dans le cadre de l'accord de contribution du Fonds John Holmes, nous avons pour mandat de mener une enquête auprès de compagnies minières canadiennes ayant des activités en Afrique. L'enquête avait pour but de faire état des lignes de conduite et des normes au sein des compagnies impliquées dans le secteur minier canadien. En plus de contribuer à une meilleure connaissance de ce qui se fait dans le domaine de la responsabilité sociale, cette enquête cherchait, à l'aide d'un questionnaire (disponible à la fin du document en *annexe 1*), à mettre en évidence ce qui définit les pratiques les plus novatrices dans le secteur des compagnies minières canadienne ayant des activités en Afrique.

Les critères de sélection des compagnies pour l'enquête étaient multiples. Déjà reconnues pour leurs bonnes/meilleures pratiques dans une étude de l'*Institut Nord-Sud* de 1998, le choix des compagnies *Alcan* et *Placer Dome* allait de soi. Ainsi, les compagnies ont été sélectionnées sur la base de leurs activités minières en Afrique, sur l'importance de leurs activités dans la production de différents minerais (bauxite, or, titane, etc.) et selon les différents procédés employés. Les entreprises minières canadiennes sélectionnées étaient les suivantes :

- | | |
|--------------------------------|---------------------------------|
| 1) Alcan; | 7) Placer Dome Inc; |
| 2) Banro Resource Corporation; | 8) QIT-Fer and Titane; |
| 3) Barrick Gold Corporation; | 9) Rio Tinto-Iron and Titanium; |
| 4) First Quantum Minerals; | 10) Semafo Inc.; |
| 5) Iamgold; | 11) Tenke Mining Corporation; |
| 6) Melkior Resources Inc.; | 12) Tiomin Resources Inc. |

Au terme de cette enquête, malgré la réception de certaines informations fort intéressantes, nous regrettons enfin qu'il n'y ait pas eu un plus grand nombre de compagnies qui aient répondu à nos questions. Car cette enquête représentait l'opportunité de faire connaître leurs positions à propos des différents enjeux liés à la responsabilité sociale des compagnies minières. Malgré nos nombreux rappels, nous n'avons finalement reçu que deux réponses, soient celles des compagnies *Alcan* et *Tiomin Resources Inc.* En conséquence, les possibilités d'offrir un portrait plus complet des meilleures pratiques nous apparaissent difficilement réalisables tel que prévu. Néanmoins, il nous est apparu intéressant de faire ressortir les principaux faits saillants que relèvent ces deux compagnies.

Voici d'abord, la version intégrale des réponses obtenues par la compagnie *Alcan* et ensuite, celle donnée par la compagnie *Tiomin Ressource Inc.* Et enfin, vous trouverez les questionnements posés par le GRAMA à la suite des conclusions que pose cette analyse.

¹ Le GRAMA tient à remercier Corinne Guimont qui a collaboré à la réalisation de cette enquête.

RÉPONSES ENVOYÉES PAR ALCAN

(version originale anglaise)

The questionnaire:

1. How does your company define “corporate social responsibility”?

Definitions are problematic – as there are a variety of differing interpretations being used. Alcan has not ‘defined’ corporate social responsibility. Alcan’s **interpretation of corporate sustainability** is:

- Improving performance – increasing the social and economic benefits and reducing the environmental impacts of our activities over the short and long term, and becoming a more profitable and competitive organization;
- Strengthening relationships and partnerships – recognizing and working with our employees, stakeholders and shareholders to address their needs and the needs of the Company;
- Demonstrating integrity and commitment – maintaining the high standards we value as a company in our day-to-day operations.

Within this interpretation, corporate social responsibility can be considered as a component of Alcan’s overall interpretation of corporate sustainability.

2. Does your company have a “code of conduct” to guide its activities outside of Canada and notably in Africa?

Yes – Alcan’s Worldwide Code of Conduct applies to all Alcan facilities, joint ventures, suppliers and contractors.

3. What is the origin of the code of conduct and what are the norms which it incorporates with regard to the environmental and social impacts?

At Alcan, we have always understood that our success is possible because of our values, which include integrity, accountability, trust and transparency, and teamwork. Alcan set an historical benchmark in ethical practice by first releasing a policy framework back in 1978 titled, *Alcan, Its Purposes, Objectives and Policies*, which was followed up by our first Code of Conduct in 1996. Given our substantial organizational change in recent years, the time is right to re-issue an updated *Worldwide Code of Employee and Business Conduct*, which supports and reinforces these values.

The Code requires that we exercise the highest degree of ethical conduct in all our dealings with or on behalf of Alcan. Despite the fact that this principle is entrenched in our culture, it is understood that in our working lives we often experience situations where the “right thing to do” is not immediately apparent. The interests of Alcan and those of fellow employees, customers, suppliers, families, communities and ourselves may seem to conflict at times. When we’re faced with such complex situations, it can be difficult to decide just where the ethical path lies.

Alcan’s Worldwide Code of Conduct addresses the following topics:

EMPLOYMENT AND THE WORKPLACE

Employee Relations
Workplace Harassment and Violence
Use of Company Property
Workplace Security
Drugs, Alcohol Impairment and Firearms
Consultants and Suppliers
Indemnification

ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE BUSINESS PRACTICE

Conflicts of Interest
Improper Payments to Officials
Accurate Books and Records
Contracts
The Marketplace
Community Relations
Intellectual Property
Alcan's Trademarks, Symbol and Logo
Copyrights
Software
International Business

GOVERNMENT RELATIONS AND POLITICAL ACTIVITY

Government Employees
Contributions to Political Parties
Political Participation
Employees as Volunteers
Entertainment of Government Representatives

LEGAL COMPLIANCE

Competition
Securities Law and Insider Trading

EXTERNAL COMMUNICATIONS

Media Relations
Shareholder Relations

ADMINISTRATION

Interpretation
Audit
Compliance by Employees, Consultants and Suppliers

Each topic has requirements (which may possibly be considered 'norms') outlined. In addition, core corporate values include :

- Integrity
- Accountability
- Trust and Transparency
- Teamwork

And the EH&S Policy presents 9 guiding principles :

Alcan EH&S Policy

Alcan is committed to excellence in environment, health and safety (EHS) through continual improvement of our awareness, understanding, and performance. Our goal is to protect and promote the environment, and the health and safety of all employees and communities where we operate. This will contribute to greater sustainability thereby benefiting all employees, communities, customers, suppliers and shareholders. Every Alcan employee is expected to actively support this policy and to implement the following guiding principles:

- Integrate EHS as an essential part of Alcan's management and decision-making process. Our shared objective is to demonstrate leadership through performance that contributes to maximization of value.
- Co-operate with customers to understand their needs and support their use of best EHS practices in the design and manufacture of safe and reliable products that take full advantage of our materials' properties throughout their life cycles.

- Demonstrate leadership in EHS to reflect the superior and life-enhancing characteristics of our products for the benefit of all society.
- Ensure a working environment that motivates and supports all employees in their efforts to achieve zero work-related injuries and illnesses.
- Minimize any adverse environmental impact from operations and business practices, and use natural resources and energy more efficiently through the effective use of management systems that continually improve EHS performance.
- Consider and establish appropriate EHS requirements when selecting business partners and contractors.
- Audit operations and business practices at regular intervals to assess EHS performance and compliance.
- Comply with legal requirements and Alcan's internal standards.
- Engage in open and transparent communication with stakeholders to achieve greater environmental, health and safety understanding and to improve performance.

Travis Engen,
President and CEO
January 2002

4. Are these the same norms that apply to activities, if such activities exist, - in Canada?

Yes – the Worldwide Code of Conduct applies to all facilities.

5. What method is used to verify the enforcement of the norms and standards guiding activities in Africa?

Visits and reviews by Alcan senior management and executives regarding the Worldwide Code of Conduct. Regular audits of EH&S management systems and performance are carried out at the facility level, in addition to regular business level assessments and reviews, which are reported to management.

6. How would you compare the norms and standards concerning environmental and social impacts, which guide the activities of your company in Africa, with those proposed by the World Bank?

On par with those outlined in the ICMM Charter (per the reference provided by Corrine Guimont http://www.icmm.com/html/charter_intro.php). We are unable to comment regarding the World Bank as the reference <http://www.worldbank.org/environment/op_policies.htm> points to multi-document set of operational policies (and others), from which specific 'World Bank norms and standards' are not readily discernible.

7. Has your company received outside recognition or awards (conference Board/ UNEP/SIO/etc) for its efforts in the area of corporate social responsibility?

Recognition in the 2001 report "Stepping Forward" by consulting firm Stratos Inc. for triple bottom line reporting by Alcan BC.

Alcan British Columbia Triple Bottom Line Report 1999 also received an Award of Excellence in the local Blue Wave Awards Program in 2000.

Alcan Alumínio do Brasil Ltda has recently received the World Safety Award by International Aluminium Institute (IAI) for its plant in Aratu (BA). It is an annual award given to aluminum companies that present the smallest labor accident rates around the world. In the year 2000, the Aratu plant obtained the lowest accident rate under the up-to-one-million-hour-of-work category. The Aratu plant has also received the Brazilian National Award for Safety and Health Management, promoted by the Brazilian Accident Prevention Association (ABPA). Winning this award was made possible thanks to the development and improvement of Aratu's Safety and

Health Management System, which in addition to keeping low accident rates, also keeps a rigorous follow-up of the plant's workers' health.

Another important safety-related award granted to the Aratu plant this year was the ABS Award (Brazilian Safety Agency), won for the second time in a row.

ANNEXES FOURNIS AVEC LE QUESTIONNAIRE ALCAN

Article de presse - 6 septembre 2001

<http://www.alcan.com/corporate/AlcanCom.nsf/838ca8f4d7d65ac1852569e6004ad87c/ea1f5647b88e6ee185256abf0052f932?OpenDocument>

Article de presse - 29 novembre 2001



"PRESS RELEASE
11-29-2001.doc"

Article de presse - 8 août 2000



"PRESS RELEASE
08-08-2000.doc"

Article de presse - 2 novembre 2000



"PRESS RELEASE
11-02-2000.doc"

PRESS RELEASE

Alcan Ahead of the Pack According to Eco-Friendly Report

09/06/2001

Montreal, Canada — Alcan Inc. is very pleased to have been selected by Innovest Strategic Value Advisors' EcoValue'21 report as the top aluminum company among global metals and mining companies for environmental performance.

In its 2001 environmental report, Innovest Strategic Value Advisors placed Alcan second among the top 21 metals and mining corporations worldwide and gave the Company its highest rating (AAA). The report examines the performance of these companies in key areas of environmental performance, risk and strategic positioning as well as financial consequences of these factors.

"Alcan believes a strong environmental commitment is intimately linked with financial performance and competitiveness. A company-wide focus on eco-efficiency initiatives results in a win-win situation for everyone," said Daniel Gagnier, Senior Vice President, Corporate and External Affairs. "Everyone at Alcan has worked hard to maintain and improve our environmental record and we are delighted with the acknowledgement of our efforts in the Innovest report."

Over 60 factors were analyzed in the study, including environmental performance as it relates to management systems, product and materials, strategy, risk factors and profit opportunities. The companies were also rated on pollutant emissions, waste management, resource use, site decommissioning, climate change and product life-cycle durability and recyclability.

"Alcan showed strongly in many of the performance categories we examined", said Dr. Martin Whittaker, the report's primary author. "Where the firm stood out was in the quality of its environmental management function and its positioning around new, higher value-added markets for aluminum which are being driven by sustainability concerns. The company's efforts to manage its energy requirements more efficiently also contributed to its higher score."

Innovest Strategic Value Advisors is an internationally recognized investment research firm specializing in environmental finance and investment opportunities. Innovest's clients include the leading industrial companies and institutional investors throughout the world. Founded in 1995 by Dr. Matthew Kiernan, Innovest is headquartered in New York, with offices in London and Toronto. The company is chaired by Jim Martin, former Chief Investment Officer for North America's largest pension fund, TIAA-CREF. For further information please visit the company's website at www.innovestgroup.com.

Alcan is a multinational, market-driven company and a global leader in aluminum and specialty packaging with annual revenues of approximately US\$13 billion. With world-class operations in primary aluminum, fabricated aluminum as well as flexible and specialty packaging, Alcan is well positioned to meet and exceed its customers' needs for innovative solutions and service. Alcan employs 52,000 people and has operating facilities in 38 countries.

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PRESS RELEASE

Alcan and Chantal Petitclerc: A winning team continues

11/29/2001

Montreal — Alcan Inc. announced today that it will continue its association with Paralympic champion Chantal Petitclerc until the end of 2005, one year beyond the 2004 Olympic and Paralympic Games in Athens. Alcan has been the Quebec athlete's major sponsor since 1998.

Alcan is proud to support this exceptional athlete and contribute to the development of amateur sport in Canada. Ms. Petitclerc exemplifies perseverance and excellence — two qualities that attracted Alcan to become associated with her.

Alcan understands the importance of ensuring that athletes receive both the financial and moral support they need on their road to the Olympics. That is why this announcement is being made just over two years prior to the start of the Athens Games.

"It's unusual for a company to have such a long-standing association with one athlete," noted Ms. Petitclerc. "But even more remarkable is a sponsorship agreement signed so far in advance of the Olympics. Athletes must have access to financial assistance for years, not just during the six months prior to the Games, in order to train well enough to be competitive. I really appreciate the confidence Alcan has shown in me, because it means I can now begin to focus on my next Olympic experience!"

"The mutual affection that has developed between Alcan employees and Chantal over the last years was a major factor in the Company's decision to renew our sponsorship of her," noted Yvon D'Anjou, vice president, Alcan Primary Metal Group — Quebec. "In the past three years, Chantal has had the opportunity to meet thousands of Alcan employees across Canada and around the world. We know how much she is appreciated and how proud our employees are to be associated with such a great athlete and such an extraordinary person."

Over the next four years, Chantal Petitclerc will continue to meet with Alcan employees and serve as an Alcan spokesperson at various public events. She will also continue to wear the Alcan colours during her competitions.

Alcan is a multinational, market-driven company and a global leader in aluminum and specialty packaging with annual revenues of approximately US\$13 billion. With world-class operations in primary aluminum, fabricated aluminum as well as flexible and specialty packaging, Alcan is well positioned to meet and exceed its customers' needs for innovative solutions and service. Alcan employs 53,000 people and has operating facilities in 37 countries.

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For further information: and interviews, please contact:

Eric Gagnon

Corporate Affairs and Communications

(514) 848-8121

PRESS RELEASE

Alcan Aluminum Recognized as 'Best of the Best' by Customers In Automotive Industries' Quest for Excellence Awards

08/08/2000

DETROIT — The Alumineering^(SM) efforts of Alcan Global Automotive Products have earned the aluminum producer recognition as one of the "best of the best" automotive suppliers in Automotive Industries' third annual Quest for Excellence awards.

The current issue of Automotive Industries magazine reports that Alcan was the top-ranked company in the aluminum category of the prestigious awards program. The publication teamed with PricewaterhouseCoopers to survey more than 1,200 professionals in the auto industry. Respondents evaluated suppliers on quality, price, delivery, service/response and innovation. Alcan will receive the award at a ceremony on August 16 at the Detroit Institute of Arts.

"Receiving this award is an extreme honor because it comes from the very people we work to serve — our customers," said Donald Macmillan, president of Alcan Global Automotive Products. "I believe that Alcan won this award because of our focus on building partnerships with our automotive customers to better understand their needs and provide them with aluminum solutions."

"We use the term Alumineering^(SM) to describe our expertise, technology and proprietary alloys which customers can tap to make high-volume aluminum structures and body panels that reduce vehicle weight without sacrificing performance characteristics or safety," said Macmillan. "Over the past five years, our customers have produced more than eight million vehicles featuring one or more body panels made of our high-performance alloys."

Alcan has signed multi-million dollar, long-term supply agreements with both General Motors and Ford Motor Company.

A recent project with General Motors to develop robust and cost-effective aluminum liftgates for the 2000 Yukon, Suburban and Tahoe has further advanced the technology and acceptance of automotive aluminum. Alcan worked with GM to develop innovative techniques to stamp, paint and spot-weld panels in this complex, high-volume assembly — the first aluminum liftgate designed and built in North America.

At Ford, Alcan's ongoing partnership provides the opportunity to help the automaker meet its commitment to raise the fuel economy of its sport utility vehicles (SUVs) by 25 percent in five years, Macmillan noted. The 2001 Ford Explorer, set to debut later this year, will be one of the most aluminum-intensive vehicles in the Ford fleet.

The Lincoln LS, the Motor Trend Car of the Year, has 40 percent of its body covered by Alcan — from the hood and trunk lid to the aluminum front fenders — and features numerous other aluminum parts in the chassis and suspension systems. This helps the LS achieve the nearly 50/50 weight distribution that contributes to the car's European-like driving characteristics.

Alcan also worked closely with both Ford and GM on their hybrid-electric concept cars, respectively the Prodigy and the Precept, which were unveiled earlier this year. Designed to achieve up to 80 miles-per-gallon, both of these vehicles feature aluminum unibody structures covered by aluminum body panels made from Alcan's proprietary sheet alloys.

Alcan Global Automotive Products' parent company, Alcan Aluminium Limited, is in the final stages of merging with the Swiss-based algroup, a recognized leader in European automotive aluminum supply. The

merger is expected to be completed this year and will give Alcan an even greater global reach and product offering.

"Alcan is already a leading supplier to the North American auto market," Macmillan said. "When we are joined with algroup, the number one European supplier, it is clear that Alcan will be the global leader in automotive aluminum."

Alcan Global Automotive Products is a unit of Alcan Aluminium Limited (NYSE: AL; TSE), a multinational, market-driven, low-cost producer of aluminum products. With operations and sales offices in over 30 countries, Alcan is one of the most international aluminum companies in the world. It is a leading producer of primary metal and a global producer and marketer of rolled aluminum products.

CONTACT:

Patrick Carpenter
Alcan Aluminum Corporation
440-423-6522

Article de presse - 2 novembre 2000

PRESS RELEASE

Alcan Sebree Plant Honored for Ongoing Environmental Initiative

11/02/2000

HENDERSON, Kentucky — Progress made by Alcan Aluminum Corporation's Sebree, Kentucky smelter in voluntarily reducing greenhouse gas emissions has earned the plant the coveted Climate Protection Award from the U.S. Environmental Protection Agency, (EPA).

The Alcan award was one of only 10 international Climate Protection awards presented by the EPA this year to companies that have demonstrated an extraordinary commitment to environmental and climate protection. An international panel of judges convened by the EPA selected the award winners.

Representatives from Alcan accepted the honor at a recognition ceremony held in conjunction with the Earth Technologies Forum in Washington, D.C. on October 31.

The award recognizes the successful efforts of the workforce at the Sebree plant in reducing perfluorocarbon (PFC) emissions generated from the primary aluminum smelting process. PFC gases are believed to contribute to the "greenhouse effect" in the earth's atmosphere and are therefore linked to global warming. While global emissions of PFCs are small compared to other greenhouse gases such as carbon dioxide and methane, the global warming potential of these compounds is relatively high.

"The EPA applauds Alcan's Sebree plant as a leader in the field of perfluorocarbon reductions from aluminum smelting and congratulates it on being honored with a 2000 Climate Protection Award," stated Kathleen Hogan, director of the Climate Protection Partnerships Division of the EPA.

In presenting the honors, the EPA commended Alcan's commitment to lead by example, voluntarily make greenhouse gas reductions and consistently report environmental progress to the EPA and the Department of Energy every year since 1995.

"We have made significant gains over the last two decades on the environmental front," said Plant Manager Dick Lee. "By incorporating environmental best practices, we have been able to adjust our processes to make meaningful environmental improvements in the way we operate our business. But now is not the time to settle for the status quo. We recognize that there is much more to do, and we are eager to keep the momentum to achieve even greater progress."

The EPA award follows a significant effort by Alcan over the past five years to lower greenhouse gas emissions. In 1995, Alcan was among the charter members of an aluminum industry group that joined with the EPA under the Voluntary Aluminum Industrial Partnership (VAIP). Recognizing the global benefit of reducing PFC emissions, the VAIP program set its goal of reducing emissions from aluminum smelting by 40 percent from 1990 levels by the year 2000.

"As a charter member of the EPA's Voluntary Aluminum Industrial Partnership, Alcan's Sebree plant reduced its PFC emissions rate by more than 60 percent between 1990 and 1999, far surpassing its year 2000 reduction goal of 40 percent. By partnering with EPA, Alcan is showing that protection of our global environment and good business can go hand in hand," Hogan added.

To date, Alcan Sebree has invested \$2.6 million to successfully adjust its smelting processes through the use of a series of process and control changes to curtail or prevent the conditions that can lead to the generation of PFC emissions.

Another example of Alcan's environmental leadership came a month ago when Alcan Aluminum Corporation's parent company, Alcan Aluminium Limited, announced that it would adopt, promote and regularly renew a long-term greenhouse gas (GHG) management commitment at all of its facilities within the framework of its TARGET program, to be implemented during 2001.

TARGET will be designed to allow all facilities to contribute to global GHG reductions based on what makes sense in their specific business context. The program is intended to produce on-going reductions, which will be reported publicly on an annual basis. TARGET will become an integral part of Alcan's business metrics and best practices.

"Aside from making good business sense, environmental stewardship is important for our communities and ecosystem, both for the present and the future," Lee added. "We take great pride in being ecologically proactive, and we work to ensure compliance in all phases of environmental regulations. To that end, this award is particularly important to us, and will be accepted on behalf of the entire Sebree workforce."

Alcan is among the leading industrial manufacturing employers in Kentucky, with over 2,300 employees and seven facilities in the Commonwealth. In addition to Sebree, the facilities include the world's largest dedicated aluminum can recycling facility in Berea, a light gauge rolling mill in Louisville, an aluminum can sheet joint venture operated by Alcan in Logan County, two packaging operations in Shelbyville, and an engineered products facility in Benton.

On a global basis, Alcan Aluminium Limited is a leader in aluminum and packaging, with annual revenues of more than \$12 billion, and 150 operations in 37 countries on five continents. Alcan maintains a low-cost position in primary aluminum, advanced aluminum fabrication facilities and a \$3 billion global flexible and specialty packaging business. Alcan employs 53,000 people and has operations in 37 countries.

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MEDIA CONTACT:
Kimberly D. Miles
440-423-6523
kim.miles@alcan.com

ICMM Charter

Environmental Stewardship Principles

Comply with or exceed the requirements of all applicable environmental laws and regulations and, in jurisdictions where these are absent or inadequate, apply cost-effective technologies and management practices to ensure the protection of the environment as well as worker and community health.

Make environmental management a high corporate priority and the integration of environmental policies, programmes and practices an essential element of decision-making.

Provide adequate resources, including education and training, and build requisite capabilities so that employees at all levels are able to understand and fulfil their environmental and community responsibilities.

Review and take account of the environmental impacts of exploration, infrastructure development, mining or processing activities, and plan and conduct the design, development, operation, remediation and closure of all facilities in a manner that optimises the economic use of resources while reducing adverse environmental impacts to acceptable levels.

Employ risk management strategies in design, operation and decommissioning, including the handling and disposal of hazardous materials and waste. If a preliminary risk assessment indicates unacceptable risks for human health or the environment, the lack of full scientific certainty will not be used as a reason to delay the introduction of cost-effective measures to reduce environmental and human health risks to acceptable levels.

Develop approaches in the early stages of exploration projects that take into consideration related environmental and community impacts.

At the initial phases of mining or processing projects, develop closure concepts and/or plans that address both environmental and community-related issues.

Review and update closure plans in light of technological advances and operational changes.

Ensure that adequate financial resources or surety instruments are in place to meet the requirements of remediation and closure plans.

Implement effective management systems; conduct regular environmental reviews or assessments and act on the results.

Develop, design and operate facilities and conduct activities taking into consideration the efficient use of energy, water and other natural resources and materials, including their recycling and reuse, the minimisation of waste and the responsible management of residual materials.

Develop, maintain and test emergency procedures in conjunction with the provider of emergency services, relevant authorities and local communities to deal adequately with any emergency.

Work with governments and other relevant parties in developing scientifically sound, economic and equitable environmental standards and procedures, based on reliable and predictable criteria.

Respect legally designated protected areas and acknowledge that certain areas may have particular ecological or cultural values alongside development potential and, in such instances, take these values into account along with the economic, social and other benefits resulting from development.

Contribute to the conservation of flora and fauna affected by exploration, extraction and processing activities.

Support research to expand scientific knowledge and develop improved technologies to protect the environment, promote the international transfer of technologies that mitigate adverse environmental effects, and use optimal sustainable technologies and cost-effective practices that take due account of local cultures and customs and economic and environmental needs.

ICMM Charter
Community Responsibility Principles

Respect the cultures, customs and values of individuals and groups whose livelihoods may be affected by exploration, mining and processing.

Recognise local communities and other affected organisations and engage with them in an open, transparent and effective process of consultation and communication from exploration through production to closure.

Assess the social, cultural, environmental and economic impacts of proposed activities and engage with local communities and other affected organisations in the design of community development strategies.

Contribute to and participate in the social, economic and institutional development of the communities where operations are located and encourage the establishment of sustainable local and regional business activities.

Reduce to acceptable levels the adverse environmental and social impacts on communities of activities related to exploration, extraction and closure of mining and processing facilities.

Respect the authority of national and regional governments; take into account their development objectives; contribute information related to mining and metal processing activities; and support the sharing of the economic benefits generated by operations.

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TIOMIN RESOURCES INC

FAX

TO: GRAMA
Researcher - UQAM
DATE: August 13/02
FROM: J- C. Potvin
OF PAGES (incl): 11

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As requested, following are answers to your questions and some additional information is also attached.

Tiomin has discovered four titanium mineral bearing sands deposits in Kenya. A feasibility study on the Kwale project was completed and presented to the Government of Kenya in April 2000, as well as an environmental impact assessment study. The latter was prepared to meet the requirements of the new environmental law of Kenya. even though it was not yet implemented. On items not addressed by Kenyan regulations. Tiomin's study relied Canadian and World Bank guidelines.

The Government of Kenya issued an environmental licence to Tiomin on July 2. 2002. The next phase is the negotiation of mining lease. Construction of the Kwale project is slated to start in the second quarter of 2003. As additional background. as well as our operational philosophy, please read the attached article by L 'Actualité and my response to the editor.

(Notes du GRAMA: La correspondance entre L'Actualité et le Président de Tiomin ne sont pas inclus dans ce document. Nous n'avons pas jugé pertinent de les reproduire étant donné qu'ils ne répondaient pas spécifiquement aux questions posées dans le questionnaire.)

1. How does your company define "corporate social responsibility"?

(See attached)

2. Does your company have a "code of conduct" to guide its activities outside of Canada and notably in Africa?

(See attached)

3. What is the origin of the code of conduct and what are the norms which it incorporates with regard to the environmental and social impacts?

One behaves the same way offshore as one would behave in Canada.

4. Are these the same norms that apply to activities, if such activities exist, -in Canada?

Tiomin 's active projects are in Kenya.

5. What method is used to verify the enforcement of the norms and standards guiding activities in Africa?

Tiomin is not yet in production. However, prior to start of construction, Tiomin will follow a comprehensive environmental management plan (to be presented to the Government of Kenya in early September) which details a myriad of line items which will be monitored during construction and during operations to ensure the development creates the least environmental impact, while maximizing socio-economics benefits.

6. How would you compare the norms and standards concerning environmental and social impacts, which guide the activities of your company in Africa, with those proposed by the World Bank?

Tiomin strives to follow high standards in all its activities by following local regulations and, where these fall short or do not exist, Tiomin follows what is expected in Canada and/or the World Bank guidelines.

Regards,

Jean-Charles Potvin
President & C. E. O.

(document PDF: Coporate profile)

Corporate Profil



Corporate Profil - Tiomin.pdf

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LES QUESTIONNEMENTS DU GRAMA

À la suite de la lecture de ces réponses, nous constatons l'analyse est très intéressante tout comme peut l'être à la fois l'abstention de participation des autres compagnies à cette enquête. Nous constatons, entre autres, que certaines réponses demeurent floues et évasives. Ainsi, l'absence de réponses des compagnies, le manque d'unanimité dans les réponses données ainsi que l'absence de codes de conduite formels et contraignants nous amène à conclure cette enquête par un questionnement qui portent sur trois enjeux liés à la responsabilité sociale des entreprises.

Tout d'abord, de qui devrait relever la responsabilité de **définir la notion de « responsabilité sociale »** et comment les pays d'accueil, où sont implantées les compagnies, peuvent-ils contribuer à l'élaboration de cette notion ? Ces questions soulèvent la nécessité de débats et d'harmonisation autour de lignes directrices reconnues, dont la mise en œuvre comporte des mécanismes de suivi, de vérification et d'application.

Encore faut-il se demander de qui relève la responsabilité de **définir le contenu de ces lignes directrices** ? À cet effet, il importe de s'interroger sur l'existence de normes et lignes de conduites au niveau international qui soient reconnues à la fois par les compagnies qui innovent dans ce domaine, par les pays concernés et par les instances multilatérales. Nous devons conclure, à partir des réponses données à la question 3, qu'une lacune existe et conséquemment un grand flou à ce propos et ce qui concerne l'existence de mécanismes indépendants qui permettraient la vérification et le respect de l'application des mesures continue de subsister.

Finalement, une fois que les questions du *qui*, du *quoi* posées, il faut réfléchir au *comment*. Comment **assurer une vérification de ces lignes directrices reconnues** qui soient indépendantes et possédant une garantie de mise en application qui soient respectées ? En conséquence, il serait pertinent de relever les expériences existantes qui font ressortir des pistes novatrices relativement aux enjeux posés par une vérification indépendante et une application rigoureuses de ces lignes directrices. Ces mesures novatrices pourraient insister notamment sur un « partenariat dans les équipes de suivis » qui associerait des représentants des communautés locales, des compagnies et d'autres acteurs indépendants. Il s'agit là de pistes d'interrogations que le GRAMA tient à approfondir dans les prochains volets de ses recherches.

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ANNEXE 1

QUESTIONNAIRE DISTRIBUÉ AUX COMPAGNIES

(version originale anglaise)

QUESTIONNAIRE FOR CANADIAN MINING COMPANIES WITH MINING ACTIVITIES IN AFRICA

Prepared by
Groupe de recherche sur les activités minières en Afrique
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The following questionnaire is an update of a study called Canadian Corporations and Social Responsibility published by the North-South Institute in 1998, the fourth chapter of which discussed the mining sector, with special emphasis on activities in Latin America. The questionnaire is also complementary to the existing study because it focuses on the mining activities in Africa. Beyond helping to grasp what already exists in the field of social responsibility, this investigation seeks to highlight and provide a better understanding of what defines the most innovative practices by proposing to publish them on the research group's web site.

The decision concerning which companies were to be approached was based on several criteria, including the fact that two of them (Alcan and Placer Dome) had already been recognized for their best practices in the North-South Institute's study. Moreover, selection was based on the existence of mining activities in Africa, as well as the inclusion of companies concerned with the production of different ores (bauxite, gold, titanium, etc).

The companies approached initially were as follows :

- | | |
|--------------------------------|---------------------------------|
| 1) Alcan; | 7) Placer Dome Inc; |
| 2) Banro Resource Corporation; | 8) QIT-Fer and Titane; |
| 3) Barrick Gold Corporation; | 9) Rio Tinto-Iron and Titanium; |
| 4) First Quantum Minerals; | 10) Semafo Inc.; |
| 5) Iamgold; | 11) Tenke Mining Corporation; |
| 6) Melkior Resources Inc.; | 12) Tiomin Resources Inc. |

The questionnaire:

- 1. How does your company define “corporate social responsibility”?**
- 2. Does your company have a “code of conduct” to guide its activities outside of Canada and notably in Africa?**
- 3. What is the origin of the code of conduct and what are the norms which it incorporates with regard to the environmental and social impacts?**
- 4. Are these the same norms that apply to activities, if such activities exist, - in Canada?**
- 5. What method is used to verify the enforcement of the norms and standards guiding activities in Africa?**
- 6. How would you compare the norms and standards concerning environmental and social impacts, which guide the activities of your company in Africa, with those proposed by the World Bank?**
- 7. Has your company received outside recognition or awards (conference Board/ UNEP/SIO/etc) for its efforts in the area of corporate social responsibility?**

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