

Towards Sustainable Mining

Crisis Management and Communications
Preparedness Protocol

TSM ASSESSMENT PROTOCOL

A Tool for Assessing Crisis Management and Communications Planning Performance

Purpose

The purpose of the assessment protocol is to provide guidance to the member companies in completing their evaluation of crisis management and communications planning against TSM indicators. The assessment protocol sets out the general expectations of COMP for crisis management and communications planning by its member companies in support of the TSM initiative.

As with any assessment of a management system, professional judgment is required in assessing the degree of implementation of a system indicator and the quality of management processes and intervention. Application of this protocol will therefore require a level of expertise in auditing and systems assessment and knowledge of and experience in the practice of crisis management and communications planning, including relevant regulatory regimes and requirements. This assessment protocol provides an indicator of the level of implementation of crisis management planning in support of the TSM initiative and is not, of itself, a guarantee of the effectiveness of crisis management planning activities.

Performance Indicators

Three performance indicators have been established:

- 1. Crisis management and communications preparedness**
Member companies must have in place a crisis management and communications plan.
- 2. Review**
Member companies will regularly review and update their crisis management and communications plan to ensure it remains responsive to the needs of the company and its operations, properly reflects risks associated with the company's operations and reflects best practices within the industry.
- 3. Training**
Crisis management training, including the use of appropriate crisis simulation exercises, will be conducted annually

The assessor is required to determine whether the criteria of each indicator are met by their company and mine sites, providing a **Yes/No** answer for each indicator. All criteria must be met for a particular indicator in order to assign a Yes rating. Where a performance element or indicator is not relevant, then an assessment of N/A should be assigned.

Corporate and Mine site-Level Assessments

For crisis management and communications planning, companies are asked to provide an assessment for each indicator for their corporate office, as well as for each of their mine sites in the Philippines. An effective overall corporate crisis plan, as outlined in COMP's *Crisis Management and Communications Planning Reference Guide**, includes the establishment of local or site-specific crisis teams to support the overall corporate management of crises. The protocols have been designed so that companies can assess the status of crisis management and communications planning at both corporate and mine site levels. This approach enables companies to identify strengths and weaknesses within their organizations.

** These guidelines provide useful reference but are not to be used as a source of additional criteria.*

1. CRISIS MANAGEMENT AND COMMUNICATIONS PREPAREDNESS

Requirement

Member companies must have in place a crisis management and communications plan.

Crisis Management and Communications Preparedness: Assessment Criteria - Corporate

Through interview and review of documentation, determine that:

1. The CEO has endorsed and demonstrated support for crisis management and communications planning.
2. Credible threats and risks have been identified for the company and protocols established to address them.
3. The results of these evaluations have been shared between corporate and operations levels.
4. A Corporate Crisis Management Team has been established, with defined roles and responsibilities.
5. A notification mechanism is in place to activate the Corporate Crisis Management Team in the event of a crisis.
6. A media spokesperson has been assigned and trained.
7. The Crisis Management and Communications Plan is a controlled document.
8. All Corporate Crisis Management Team members have been provided the plan and key contact list.
9. A crisis control center has been established and equipped.
10. Key media contact and telephone log sheets have been prepared.
11. Mechanisms to alert employees to a crisis and its developments have been established.
12. Contact information for key stakeholders relevant to the credible threats and risks has been prepared.

Crisis Management and Communications Preparedness (cont'd):
Assessment Criteria – Mine site

Through interview and review of documentation, determine that:

1. Credible threats and risks have been identified and protocols established to address them.
2. The results of these evaluations have been shared with the corporate office.
3. A Local Crisis Management Team has been established, with defined roles and responsibilities.
4. A notification mechanism is in place to activate the Local Crisis Management Team in the event of a crisis.
5. A media spokesperson has been assigned and trained.
6. The Local Crisis Management and Communications Plan is a controlled document.
7. All Local Crisis Management Team members have been provided the plan and key contact list.
8. A crisis control center has been established and equipped.
9. Key media contact and telephone log sheets have been prepared.
10. Mechanisms to alert employees to a crisis and its developments have been established.
11. Contact information for key local stakeholders relevant to the credible threats and risks have been prepared
12. The mine site meets annually with senior members of the local emergency response authorities (where they exist).

2. REVIEW

Requirement

Member companies will review and update their crisis management and communications plan to ensure it remains responsive to the needs of the company and its operations, properly reflects risks associated with the company's operations and reflects best practice within the industry.

Review

ASSESSMENT CRITERIA - CORPORATE

Through interview and review of documentation, determine that:

1. The Corporate Crisis Management and Communications Plan is regularly reviewed and updated:
 - when there is a change of personnel of those associated with implementation of the crisis management plan;
 - when there is a change in business (e.g. a new mine); and/or
 - every 18-24 months.
2. The mechanism to notify the crisis management team is tested at least twice per year.
3. Mechanisms to alert employees to a crisis and its developments are tested at least once per year.
4. Processes exist to ensure that new crisis team members are familiarized with the plan within two months of joining the team.

ASSESSMENT CRITERIA – MINE SITE

Through interview and review of documentation, determine that:

1. Local crisis management and communications plans are regularly reviewed and updated:
 - reviewed and updated when there is a change of personnel of those associated with implementation of the crisis management and communications plan and/or
 - every 18-24 months
2. The mechanism to notify the crisis management team is tested at least twice per year.
3. Mechanisms to alert employees to a crisis and its developments are tested at least once per year
4. The mine site's plan is shared with the corporate office.
5. Processes exist to ensure that new crisis team members are familiarized with the plan within two months of joining the team.

3. TRAINING

Requirement

Crisis management training, including the use of appropriate crisis simulation exercises, will be conducted annually.

Training

ASSESSMENT CRITERIA - CORPORATE

Through interview and review of documentation, determine that:

- “Table top” crisis simulation exercises are conducted annually.

ASSESSMENT CRITERIA – MINE SITE

Through interview and review of documentation, determine that:

1. “Table top” crisis simulation exercises are conducted annually.
2. A full crisis simulation is conducted every three years.

APPENDIX 1: FREQUENTLY ASKED QUESTIONS

Protocol-Specific Guidance

1. What is a crisis?

A “crisis” is defined as a sudden event that may significantly affect the company’s ability to carry out its business.

It is important to distinguish between an emergency that can and should be handled by local management in accordance with its Emergency Response plans, and a crisis that requires corporate, senior management involvement and action.

A crisis may exist or be developing if:

- The emergency poses a significant threat to the public or employees
- The emergency situation provokes government scrutiny
- You no longer have full control of the situation - other agencies are taking charge
- The situation has caused national or international media interest
- The situation is likely to escalate and there is no immediate resolution in sight
- The corporation’s reputation may be damaged or there is a threat to the bottom line or share value.
- Incidents that are subject to crisis management may include:
 - Industrial emergencies such as accidents resulting in critical injury or property damage, fire, building collapse, mine cave-ins, flooding, explosions, power failure, freeze-up, loss of water.
 - Natural disasters such as flood, mud slide, tsunami, tornado, hurricane, earth quake, fire or volcano which may jeopardize personal safety or commercial operations and severely disrupt routine commercial transportation and communications links with the affected locations.
 - Medical emergencies in jurisdictions where quality medical care is either remote or entirely lacking.
 - Accidental releases of materials such as tailings dam failure or major chemical spill which could significantly impact the environment or health and safety of affected persons.
 - Missing person incidents related to criminal or non-criminal circumstances.
 - Political and security risks such as kidnaps, extortion’s, bomb threats, bombings, political or civil unrest, illegal detention by local authorities, and insurgent or guerrilla activity.
 - Any other unexpected event which might threaten the safety of Company or contractor employees or the local community or damage the reputation of the company as a responsible corporate citizen.

2. Does a shared network mine site, such as a SharePoint site, constitute a sharing of the credible threats and risks evaluation?

Yes, placing a document containing the identification of credible threats and risks on a shared network mine site, like SharePoint site, is a suitable way to share these evaluations between the mine site and corporate office as long as some form of notification is sent to the accountable person at the receiving end.

3. What constitutes a controlled document?

A controlled document has tracking capabilities that help to ensure that employees always have the most current document available. This means that there is a process in place to revise and approve the document, and out-of-date versions are destroyed or withdrawn from circulation and replaced. Document control necessitates a process to keep track of issued documents. This record-keeping process will ensure that the latest revision is always sent out to replace every copy of the previous version.

A process to ensure a document is controlled can either be based on physical paper documents or on electronic documents. In the case of electronic documents, it is acceptable that the process only extends to the point at which a document is printed and, once printed, that document is no longer considered controlled.

4. What is a "table-top" crisis management exercise?

A table-top or round-table exercise is a useful, cost-effective tool for honing crisis management and communications skills and for helping the crisis management team identify any weaknesses or gaps in their crisis management planning.

Working from a schedule of events, a facilitator offers the crisis team or management group a series of situations to be analyzed and discussed before decisions are made and actions taken. Pressure is exerted through ever-increasing complexity and frequency of problems, with the facilitation team raising issues from the perspectives of outside audiences.

Different types of crisis management planning exercises, including full-blown crisis simulations, are described in Section 8 of COMP's Guidelines for Corporate Crisis Management and Communications Planning. Many communications and public affairs firms offer services in crisis management and communications training.

5. How do I assess a mine site with a new crisis plan that has not yet completed a full crisis simulation exercise?

A mine site with a new plan has three years in which to plan and carry out a full crisis simulation exercise. So long as the new plan has been tested through table top exercises, the assessor may respond "yes" to this indicator.

6. Can a real life crisis meet the requirement for a test of the crisis management and communications plan?

Yes, a real life crisis can meet the requirement for a test of the crisis management and communications plan if the plan was implemented in response to the crisis, and following the crisis the team met to review the plan's implementation and identify lessons learned and the need for any modifications to the plan. The results of this review must be documented.

7. Does an annual table-top exercise have to address the entire mine site?

No, it is not a requirement that the annual table-top exercise address the entire mine site. Rather, one would expect that table-top exercises should test different situations and different parts of the business so that over time, the entire crisis plan is tested and honed.

8. How can a company with a corporate structure that stations its management employees all over the world meet the intent of the requirement to have a crisis room established and equipped?

Recognizing that a crisis room may not be appropriate for some corporate offices that are not centralized, a company can still attain a “yes” for indicator 1 if there is a formal process for bringing the corporate crisis team together virtually using technology.

9. For companies headquartered outside of Philippines, who should endorse and demonstrate support for crisis management and communications planning?

For companies headquartered outside of the Philippines, the most senior in-country executive should be the one to endorse and demonstrate support for crisis management and communications planning.

APPENDIX 2: TSM SELF ASSESSMENT CHECKLIST

Crisis Management and Communications Planning – Corporate

Mine site Name:		Company Name:	
Assessed By:		Date Submitted:	

Supporting Documentation / Evidence:	
NAME OF DOCUMENT	LOCATION

Interviewees:			
NAME	POSITION	NAME	POSITION

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 1: CRISIS MANAGEMENT AND COMMUNICATIONS PREPAREDNESS					
Indicator 1	1. Has the CEO endorsed and demonstrated support for crisis management and communications planning?				<ul style="list-style-type: none"> - CEO signature on the Crisis Management and Communications Plan - Active participation in simulation exercises (memos/documentation)
	2. Have credible threats and risks been identified for the company and protocols established to address them?				<ul style="list-style-type: none"> - Crisis Management and Communications Plan must include risk assessment and illustrates protocols - Workshop results – (included in the comm
	3. Have the results of these evaluations been shared between corporate and operations levels?				<ul style="list-style-type: none"> - Memos, emails, workshops
	4. Has a Corporate Crisis Management Team been established, with defined roles and responsibilities?				<ul style="list-style-type: none"> - Org. Chart, actual interviews
	5. Is there a notification mechanism in place to activate the Corporate Crisis Management Team in the event of a crisis?				<ul style="list-style-type: none"> - Test broadcast
	6. Has a media spokesperson been assigned and trained?				<ul style="list-style-type: none"> - Job description, certificate of training
	7. Is the Crisis Management and Communications Plan a controlled document?				<ul style="list-style-type: none"> - Authority levels (to edit, disseminate), stora
	8. Have all Corporate Crisis Management Team members been provided the plan and key contact list?				<ul style="list-style-type: none"> - Documentation, signatures of team members on Crisis Comms Plan, actual presentation of team member
	9. Has a crisis control center been established and equipped?				<ul style="list-style-type: none"> - Actual inspection, test
	10. Have key media contact and telephone log sheets been prepared?				<ul style="list-style-type: none"> - Test broadcast, documentation
	11. Have mechanisms to alert employees to a crisis and its developments been established?				<ul style="list-style-type: none"> - Actual list
	12. Has contact information for key stakeholders relevant to the credible threats been prepared?				<ul style="list-style-type: none"> - Actual list
<p><i>If you have answered "Yes" to all of the questions, assign a "Yes" for this indicator. Otherwise, assign a "No".</i></p>					
ASSESSED CORPORATE PERFORMANCE FOR INDICATOR 1				Y / N: _____	

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 2: REVIEW					
Indicator 2	1. Is the Corporate Crisis Management and Communications Plan regularly reviewed and updated: <ul style="list-style-type: none"> when there is a change of personnel of those associated with implementation of the crisis management and communications plan? 				<ul style="list-style-type: none"> Documentation of simulation assessment resulting to updates or changes/ workshops on regular risk assessment Documentation of orientation of new personnel (signed document) Documentation of re-evaluation of plan (every 18-24mos)
	<ul style="list-style-type: none"> when there is a change in business (e.g. a new mine), and/or every 18-24 months? 				
	2. Is the mechanism to notify the crisis management team tested at least twice per year?				- Documentation/video (minutes)
	3. Are mechanisms to alert employees to a crisis and its developments tested at least once per year?				- Documentation (photos/screen caps with date)
	4. Do processes exist to ensure that new crisis team members are familiarized with the plan within two months of joining the team?				- Documentation
<i>If you have answered "Yes" to all of the questions, assign a "Yes" for this indicator. Otherwise, assign a "No".</i>					
ASSESSED CORPORATE PERFORMANCE FOR INDICATOR 2					Y / N: _____

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 3: TRAINING					
Indicator 3	1. Are "table top" crisis simulation exercises conducted annually?				- Documentation
	<i>If you have answered "Yes" to this question, assign a "Yes" for this indicator. Otherwise, assign a "No".</i>				
ASSESSED CORPORATE PERFORMANCE FOR INDICATOR 3					Y / N: _____

Crisis Management Planning – Mine site

Mine site Name:		Company Name:	
Assessed By:		Date Submitted:	

Supporting Documentation / Evidence:	
NAME OF DOCUMENT	LOCATION

Interviewees:			
NAME	POSITION	NAME	POSITION

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 1: CRISIS MANAGEMENT PREPAREDNESS					
Indicator 1	1. Have credible threats and risks been identified for the company and protocols established to address them?				- Crisis Comm Plan - Results of risk assessment workshop
	2. Have the results of these evaluations been shared with the corporate office?				- Memo, emails, unified Crisis Comms Plan
	3. Has a Local Crisis Management Team been established, with defined roles and responsibilities?				- Org chart, job description and CMT functions
	4. Is there a notification mechanism in place to activate the Local Crisis Management Team in the event of a crisis?				- Alert levels, test broadcast
	5. Has a media spokesperson been assigned and trained?				- Certification of training
	6. Is the Local Crisis Management and Communications Plan a controlled document?				- Same as corporate
	7. Have all Local Crisis Management Team members been provided the plan and key contact list?				- Same as corporate
	8. Has a crisis control center been established and equipped?				- Same as corporate
	9. Have key media contact and telephone log sheets been prepared?				- Same as corporate
	10. Have mechanisms to alert employees to a crisis and its developments been established?				- Same as corporate
	11. Has contact information for key stakeholders relevant to the credible threats been prepared?				- Same as corporate
	12. Does the mine site meet annually with senior members of the local emergency response authorities (where they exist)?				- Documentation
<i>If you have answered "Yes" to all of the questions, assign a "Yes" for this indicator. Otherwise, assign a "No".</i>					
	ASSESSED MINE SITE PERFORMANCE FOR INDICATOR 1				Y / N: _____

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 2: REVIEW					
Indicator 2	1. Is the Local Crisis Management and Communications Plan regularly reviewed and updated when there is a change of personnel of those associated with implementation of the crisis management and communications plan, and/or every 18-24 months?				<ul style="list-style-type: none"> - Documentation of simulation assessment resulting to updates or changes/ workshops on regular risk assessment • Documentation of orientation of new personnel (signed document) • Documentation of re-evaluation of plan (every 18-24mos)
	2. Is the mechanism to notify the crisis management team tested at least twice per year?				- Documentation/video
	3. Are mechanisms to alert employees to a crisis and its developments tested at least once per year?				- Documentation (photos/screen caps with date stamp)
	4. Is the mine site's plan shared with the corporate office?				- Documentation
	5. Do processes exist to ensure that new crisis team members are familiarized with the plan within two months of joining the team?				- Documentation
<i>If you have answered "Yes" to all of the questions, assign a "Yes" for this indicator. Otherwise, assign a "No".</i>					
ASSESSED MINE SITE PERFORMANCE FOR INDICATOR 2				Y / N: _____	

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
INDICATOR 3: TRAINING					
Indicator 3	1. Are "table top" crisis simulation exercises conducted annually?				- Documentation
	2. Is a full crisis simulation conducted every three years?				- Documentation
<i>If you have answered "Yes" to all of the questions, assign a "Yes" for this indicator. Otherwise, assign a "No".</i>					
ASSESSED MINE SITE PERFORMANCE FOR INDICATOR 3				Y / N: _____	

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The association consists of members coming from exploration, mining, mineral processing and services industries including professional associations. The members are united by a shared commitment to the principles of economic growth, sustainable development and as government's partners in development.

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Towards Sustainable Mining
Vers le développement minier durable

For more information about the TSM initiative, visit:

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www.mining.ca/tsm

Quebec Mining Association

www.amq-inc.com

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www.kaivosvastuu.fi/verkosto/jasenet/statement-of-intent

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