

Self-assessment year 2025



Meets
Partially meets
Does not meet
Not applicable







Locations / sites






Bernardan (France)

HIGH

Requirement

TOPIC I: AFFECTED COMMUNITIES		
Principle 1 Respect the rights of project-affected people and meaningfully engage them at all phases of the tailings facility lifecycle, including closure.		
<p>1.1 Demonstrate respect for human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPR), conduct human rights due diligence to inform management decisions throughout the tailings facility lifecycle and address the human rights risks of tailings facility credible failure scenarios.</p> <p>For existing facilities, the Operator can initially opt to prioritise salient human rights issues in accordance with the UNGPR.</p>		<p>Orano Mining carries out its activities in compliance with internationally recognized human rights, in particular the Universal Declaration of Human Rights adopted by the UN in 1948; the principles of the UN Global Compact; the fundamental conventions of the International Labour Organization (ILO); and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.</p> <p>Orano Mining values transparency and dialogue with its stakeholders, in particular on questions relating to human rights raised during the Site Monitoring Committees (CSSs). Set up on the initiative of local Prefects (government representatives), Site Monitoring Committees are bodies to promote dialogue and consultation between the operator and local stakeholders (residents, employees, elected officials, NGOs, etc.).</p> <p>Their aim is to inform the people on and around our sites about the effects of activities relating to tailings storage facilities, on public health and the environment.</p> <p>For the Bernardan (BER), a Site Monitoring Committee is in place. The communication with stakeholders dates back to early eighties. Orano Mining has been actively participating to present and share safety, environmental and projected remediation plans to involved stakeholders. Prior to the annual Site Monitoring Committee, all stakeholder college representatives discuss the Site Monitoring Committee's agenda and can raise questions which will be answered by Orano Mining during the annual session.</p>
<p>1.2 Where a new tailings facility may impact the rights of indigenous or tribal peoples, including their land and resource rights and their right to self-determination, work to obtain and maintain Free Prior and Informed Consent (FPIC) by demonstrating conformance to international guidance and recognised best practice frameworks.</p>		<p>Not applicable for Bernardan</p>
<p>1.3 Demonstrate that project-affected people are meaningfully engaged throughout the tailings facility lifecycle in building the knowledge base and in decisions that may have a bearing on public safety and the integrity of the tailings facility. The Operator shall share information to support this process.</p>		<p>Bernardan Tailings Facility (TF) has closed since 2001 and remediation was completed in 2002. A annual Site Monitoring commission with project-affected people (CSS) is conducted by Orano Mining to described TF monitoring. A CSS report is sent to administration every year.</p>
<p>1.4 Establish an effective operational-level, non-judicial grievance mechanism that addresses complaints and grievances of project-affected people relating to the tailings facility, and provide remedy in accordance with the UNGPR.</p>		<p>The management of grievances plays an essential part in the quality of our relations with our stakeholders. With this in mind, Orano Mining deployed a grievance mechanism on all of its sites in 2020 to resolve complaints at an operational level and gives annual feedback on the complaints received. This mechanism has been designed according to the requirements of the UN Guiding Principle.</p>
TOPIC II: INTEGRATED KNOWLEDGE BASE		
Principle 2 Develop and maintain an interdisciplinary knowledge base to support safe tailings management throughout the tailings facility lifecycle, including closure.		








<p>2.1 Develop and document knowledge about the social, environmental and local economic context of the tailings facility, using approaches aligned with international best practices. Update this knowledge at least every five years, and whenever there is a material change either to the tailings facility or to the social, environmental and local economic context. This knowledge should capture uncertainties due to climate change.</p>		<p>The social, environmental and local economic context is described in the environmental impact study. Environmental impact study must be update every 15 years according to French regulation. An update of the Environmental impact study will be conducted by the end of 2030. Specifically on tailing facility : Environmental, social and economic impact assessments were described in the breach analysis of BER TF (2024). Climate change evaluation is integrated in the Environmental impact study and stability study. Stability study report was completed in 2023.</p>
<p>2.2 Prepare, document and update a detailed site characterisation of the tailings facility site(s) that includes data on climate, geomorphology, geology, geochemistry, hydrology and hydrogeology (surface and groundwater flow and quality), geotechnical, and seismicity. The physical and chemical properties of the tailings shall be characterised and updated regularly to account for variability in ore properties and processing.</p>		<p>The TF monitoring and supervision program, Breach analysis (2024) and stability study (2023) gather almost all this information. Design Basis Report with a geotechnical document compilation will be expected at the end of 2025 or early 2026.</p>
<p>2.3 Develop and document a breach analysis for the tailings facility using a methodology that considers credible failure modes, site conditions, and the properties of the slurry. The results of the analysis shall estimate the physical area impacted by a potential failure. When flowable materials (water and liquefiable solids) are present at tailings facilities with Consequence Classification of 'High', 'Very High' or 'Extreme', the results should include estimates of the physical area impacted by a potential failure, flow arrival times, depth and velocities, and depth of material deposition. Update whenever there is a material change either to the tailings facility or the physical area impacted.</p>		<p>Orano Mining conducted a breach analysis in 2024 in order to reply to requirement 4.1 of GISTM. The assessment results show credible failure modes. Potential consequences of the failure of the Bernardan TF fall into the "Significant" class. The flowability of solids in the in situ tailings was described in the stability study. Numerical models to estimate the impact area in case of failure was included in the breach analysis study.</p>
<p>2.4 In order to identify the groups most at risk, refer to the updated tailings facility breach analysis to assess and document potential human exposure and vulnerability to tailings facility credible failure scenarios. Update the assessment whenever there is a material change either to the tailings facility or to the knowledge base.</p>		<p>The reports references are: Tractebel Engineering, P016680_RP03-Bernardan-2020 Tractebel Engineering, Analyse des Consequences de Rupture selon GISTM-W.002445_BER-2024</p>
<p>Principle 3 Use all elements of the knowledge base - social, environmental, local economic and technical - to inform decisions throughout the tailings facility lifecycle, including closure.</p>		
<p>3.1 To enhance resilience to climate change, evaluate, regularly update and use climate change knowledge throughout the tailings facility lifecycle in accordance with the principles of Adaptive Management.</p>		<p>Climate change is integrated into stability study and environmental impact study. These studies are conducted every 15 years according to French regulation</p>
<p>3.2 For new tailings facilities, the Operator shall use the knowledge base and undertake a multi-criteria alternatives analysis of all feasible sites, technologies and strategies for tailings management. The goal of this analysis shall be to: (i) select an alternative that minimises risks to people and the environment throughout the tailings facility lifecycle; and (ii) minimise the volume of tailings and water placed in external tailings facilities. This analysis shall be reviewed by the Independent Tailings Review Board (ITRB) or a senior independent technical reviewer. For existing tailings facilities, the Operator shall periodically review and refine the tailings technologies and design, and management strategies to minimise risk and improve environmental outcomes. An exception applies to facilities that are demonstrated to be in a state of safe closure.</p>		<p>Bernardan TF production ended in 2001 and no longer produces tailings. The remediation was completed in 2002. Environmental monitoring results respect regulatory limits and safe status of the ICPE site.</p>

<p>3.3 For new tailings facilities, use the knowledge base, including uncertainties due to climate change, to assess the social, environmental and local economic impacts of the tailings facility and its potential failure throughout its lifecycle. Where impact assessments predict material acute or chronic impacts, the Operator shall develop, document and implement impact mitigation and management plans using the mitigation hierarchy.</p>		<p>Not applicable for Bernardan</p>
<p>3.4 Update the assessment of the social, environmental and local economic impacts to reflect a material change either to the tailings facility or to the social, environmental and local economic context. If new data indicates that the impacts from the tailings facility have changed materially, including as a result of climate change knowledge or long-term impacts, the Operator shall update tailings facility management to reflect the new data using Adaptive Management best practices.</p>		<p>Bernardan TF production ended in 2001 and no longer produces tailings. The remediation with a mineral cover was completed in 2002 so we can consider that materials haven't changed since 2002. Social, environmental and economical impacts related to a potential failure was studied in 2024 (breach analysis).</p>
<p>TOPIC III: DESIGN, CONSTRUCTION, OPERATION AND MONITORING OF THE TAILINGS FACILITY</p>		
<p>Principle 4 Develop plans and design criteria for the tailings facility to minimise risk for all phases of its lifecycle, including closure and post closure.</p>		
<p>4.1 Determine the consequence of failure classification of the tailings facility by assessing the downstream conditions documented in the knowledge base and selecting the classification corresponding to the highest Consequence Classification for each category in Annex 2, Table 1. The assessment and selection of the classification shall be based on credible failure modes, and shall be defensible and documented.</p>		<p>Orano Mining conducted a breach analysis in 2024 in order to reply to requirement 4.1 of GISTM. The assessment results show for credible failure modes, the potential consequences of the failure of the Bernardan TF fall into the “Significant” class. Stability assessment (2023) is a input data to define credible failure scenarios.</p>
<p>4.2 With the objective of maintaining flexibility in the development of a new tailings facility and optimising costs while prioritising safety throughout the tailings facility lifecycle:</p> <p>A. Develop preliminary designs for the tailings facility with external loading design criteria consistent with both the consequence of failure classification selected based on current conditions and higher Consequence Classifications (including ‘Extreme’).</p> <p>B. Informed by the range of requirements defined by the preliminary designs, either:</p> <ol style="list-style-type: none"> 1. Implement the design for the ‘Extreme’ Consequence Classification external loading criteria; or 2. Implement the design for the current Consequence Classification criteria, or a higher one, and demonstrate that the feasibility, at a proof of concept level, to upgrade to the design for the ‘Extreme’ classification criteria is maintained throughout the tailings facility lifecycle. <p>C. If option B.2 is implemented, review the consequence of failure classification at the time of the Dam Safety Review (DSR) and at least every five years, or sooner if there is a material change in the social, environmental and local economic context, and complete the upgrade of the tailings facility to the new Consequence Classification as determined by the DSR within three years. This review shall proceed until the tailings facility has been safely closed according to this Standard.</p> <p>D. The process described above shall be reviewed by the Independent Tailings Review Board (ITRB) or the senior independent technical reviewer, as appropriate for the tailings facility Consequence Classification.</p> <p>Subject to Requirement 4.7, Requirements 4.2.C and 4.2.D shall also apply to existing tailings facilities.</p>		<p>Not applicable for Bernardan</p>
<p>4.3 The Accountable Executive shall take the decision to adopt a design for the current Consequence Classification criteria and to maintain flexibility to upgrade the design for the highest classification criteria later in the tailings facility lifecycle. This decision shall be documented.</p>		<p>Not applicable for Bernardan</p>









<p>4.4 Select, explicitly identify and document all design criteria that are appropriate to minimise risk for all credible failure modes for all phases of the tailings facility lifecycle.</p>	<p>●</p>	<p>Orano Mining conducted a breach analysis in 2024 in order to reply to requirement 4.1 of GISTM. The assessment results show for credible failure modes, the potential consequences of the failure of the Bernardan TF fall into the “Significant” class. In stability study, safety factors are above design criteria selected to minimise risk</p>
<p>4.5 Apply design criteria, such as factors of safety for slope stability and seepage management, that consider estimated operational properties of materials and expected performance of design elements, and quality of the implementation of risk management systems. These issues should also be appropriately accounted for in designs based on deformation analyses.</p>	<p>●</p>	<p>As part of the PNGMDR French national program, Orano Mining conducted the last stability study in 2023 and show safety factors for multi-conditions (hydrologic and seismic).</p>
<p>4.6 Identify and address brittle failure modes with conservative design criteria, independent of trigger mechanisms, to minimise their impact on the performance of the tailings facility.</p>	<p>●</p>	<p>Orano Mining conducted a breach analysis in 2024 in order to reply to requirement 4.1 of GISTM. The assessment results show for credible failure modes, the potential consequences of the failure of the Bernardan TF fall into the “Significant” class.</p>
<p>4.7 Existing tailings facilities shall conform with the Requirements under Principle 4, except for those aspects where the Engineer of Record (EOR), with review by the ITRB or a senior independent technical reviewer, determines that the upgrade of an existing tailings facility is not viable or cannot be retroactively applied. In this case, the Accountable Executive shall approve and document the implementation of measures to reduce both the probability and the consequences of a tailings facility failure in order to reduce the risk to a level as low as reasonably practicable (ALARP). The basis and timing for addressing the upgrade of existing tailings facilities shall be risk-informed and carried out as soon as reasonably practicable.</p>	<p>●</p>	<p>Principle 4 is respected for Orano Mining Bernardan TF as detailed in the breach analysis (2024).</p>
<p>4.8 The EOR shall prepare a Design Basis Report (DBR) that details the design assumptions and criteria, including operating constraints, and that provides the basis for the design of all phases of the tailings facility lifecycle. The DBR shall be reviewed by the ITRB or senior independent technical reviewer. The EOR shall update the DBR every time there is a material change in the design assumptions, design criteria, design or the knowledge base and confirm internal consistency among these elements.</p>	<p>●</p>	<p>Bernardan TF remediation was completed in 2002. Several documents describe TF activities history and design evolution between 1978 and 2002. An update of Design Basis Report with geotechnical documents compilation will expected at the end of 2025 or early 2026. EOR is in charge of this document.</p>
<p>Principle 5 Develop a robust design that integrates the knowledge base and minimises the risk of failure to people and the environment for all phases of the tailings facility lifecycle, including closure and post-closure</p>		
<p>5.1 For new tailings facilities, incorporate the outcome of the multi-criteria alternatives analysis including the use of tailings technologies in the design of the tailings facility. For expansions to existing tailings facilities, investigate the potential to refine the tailings technologies and design approaches with the goal of minimising risks to people and the environment throughout the tailings facility lifecycle.</p>	<p>⊗</p>	<p>Not applicable for Bernardan</p>
<p>5,2 Develop a robust design that considers the technical, social, environmental and local economic context, the tailings facility Consequence Classification, site conditions, water management, mine plant operations, tailings operational and construction issues, and that demonstrates the feasibility of safe closure of the tailings facility. The design should be reviewed and updated as performance and site data become available and in response to material changes to the tailings facility or its performance</p>	<p>⊗</p>	<p>Not applicable for Bernardan</p>








<p>5.3 Develop, implement and maintain a water balance model and associated water management plans for the tailings facility, taking into account then knowledge base including climate change, upstream and downstream hydrological and hydrogeological basins, the mine site, mine planning and overall operations and the integrity of the tailings facility throughout its lifecycle. The water management programme must be designed to protect against unintentional releases.</p>	<p>●</p>	<p>Orano Mining conducted different studies such as hydrogeological study, hydraulic studies, stability study leading to monitoring rules.</p>
<p>5.4 Address all potential failure modes of the structure, its foundation, abutments, reservoir (tailings deposit and pond), reservoir rim and appurtenant structures to minimise risk to ALARP. Risk assessments must be used to inform the design.</p>	<p>●</p>	<p>Breach analysis in 2024 and stability study show all potential failure modes and their credibility. A quaterly hydraulic monitoring is effective to minimize the risk of a tailings liquefaction. The worst scenario of failure is between 30m and 60m landslide with a general consequences classed as significant, related to potential population at risk and health, social and cultural impacts.</p>
<p>5.5 Develop a design for each stage of construction of the tailings facility, including but not limited to start-up, partial raises and interim configurations, final raise, and all closure stages.</p>	<p>●</p>	<p>Bernardan TF remediation was completed in 2002. Several documents describe TF activities history and design evolution between 1978 and 2002.</p>
<p>5.6 Design the closure phase in a manner that meets all the Requirements of the Standard with sufficient detail to demonstrate the feasibility of the closure scenario and to allow implementation of elements of the design during construction and operation as appropriate. The design should include progressive closure and reclamation during operations.</p>	<p>⊗</p>	<p>Bernardan TF remediation was completed in 2002.</p>
<p>5.7 For a proposed new tailings facility classified as 'High', 'Very High' or 'Extreme', the Accountable Executive shall confirm that the design satisfies ALARP and shall approve additional reasonable steps that may be taken downstream, to further reduce potential consequences to people and the environment. The Accountable Executive shall explain and document the decisions with respect to ALARP and additional consequence reduction measures.</p> <p>For an existing tailings facility classified as 'High', 'Very High' or 'Extreme', the Accountable Executive, at the time of every DSR or at least every five years, shall confirm that the design satisfies ALARP and shall seek to identify and implement additional reasonable steps that may be taken to further reduce potential consequences to people and the environment. The Accountable Executive shall explain and document the decisions with respect to ALARP and additional consequence reduction measures, in consultation with external parties as appropriate.</p>	<p>●</p>	<p>Orano conducts every five years audit led by Certified Engineering Company (EOR) (Visite technique Approfondie - VTA). The last VTA was conducted the 26th of october 2020. The next VTA is planned in october 2025. Every time, recommendations from EOR are included into the VTA report with respect to ALARP.</p>
<p>5.8 Where other measures to reduce the consequences of a tailings facility credible failure mode as per the breach analysis have been exhausted, and pre-emptive resettlement cannot be avoided, the Operator shall demonstrate conformance with international standards for involuntary resettlement.</p>	<p>⊗</p>	<p>All credible failure modes were studied and reduced to acceptable risk. Monitoring team's offices are based on Bessines industrial site, located 30 km from Bernardan TF</p>
<p>Principle 6 Plan, build and operate the tailings facility to manage risk at all phases of the tailings facility lifecycle, including closure and post-closure.</p>		








<p>6.1 Build, operate, monitor and close the tailings facility according to the design intent at all phases of the tailings facility lifecycle, using qualified personnel and appropriate methodology, equipment and procedures, data acquisition methods, the Tailings Management System (TMS) and the overall Environmental and Social Management System (ESMS) for the mine and associated infrastructure.</p>	<p>●</p>	<p>Orano Mining set an internal policy for TFs monitoring and risk management. Qualified personnel is deployed in 4 teams in France to monitor and operate TFs. The Bessines team in charge of TFs operates on seven TFs (all in post-closure phasis) including Bernardan TF. Bessines team has equipments, procedures and methodology specific to its TFs. A system exist for acquiring and documenting operational and monitoring data (post closure tailings management)</p>
<p>6.2 Manage the quality and adequacy of the construction and operation process by implementing Quality Control, Quality Assurance and Construction vs Design Intent Verification (CDIV). The Operator shall use the CDIV to ensure that the design intent is implemented and is still being met if the site conditions vary from the design assumptions.</p>	<p>⊗</p>	<p>Bernardan TF is closed and no longer produces tailings</p>
<p>6.3 Prepare a detailed Construction Records Report ('as-built' report) whenever there is a material change to the tailings facility, its infrastructure or its monitoring system. The EOR and the Responsible Tailings Facility Engineer(RTFE) shall sign this report.</p>	<p>⊗</p>	<p>Bernardan TF has closed since 2001 and no longer produces tailings</p>
<p>6.4 Develop, implement, review annually and update as required an Operations, Maintenance and Surveillance (OMS) Manual that supports effective risk management as part of the TMS. The OMS Manual should follow best practices, clearly provide the context and critical controls for safe operations, and be reviewed for effectiveness. The RTFE shall provide access to the OMS Manual and training to all levels of personnel involved in the TMS with support from the EOR.</p>	<p>●</p>	<p>Bernardan OMS Manual is updated every five years with EOR support and is transmitted to the french administration. A quarterly visual inspection reinforces Bernardan monitoring. A critical controls map shows visual points for ground deformations, surface water monitoring and measuring points. Following the GISTM requirements, the RTFE will provide in 2025 a training to personnel involved in TFs.</p>
<p>6.5 Implement a formal change management system that triggers the evaluation, review, approval and documentation of changes to design, construction, operation or monitoring during the tailings facility lifecycle. The change management system shall also include the requirement for the EOR to prepare a periodic Deviance Accountability Report (DAR), that provides an assessment of the cumulative impact of the changes on the risk level of the as-constructed facility. The DAR shall provide recommendations for managing risk, if necessary, and any resulting updates to the design, DBR, OMS and the monitoring programme. The DAR shall be approved by the Accountable Executive.</p>	<p>●</p>	<p>Change management system is actually conducted with OMS annual review. If there is any deviation, EOR will notify it in the VTA report which is transmitted to the french administration.</p>
<p>6.6 Include new and emerging technologies and approaches and use the evolving knowledge in the refinement of the design, construction and operation of the tailings facility.</p>	<p>●</p>	<p>Bernardan TF is in post-closure phasis. New and emerging technologies and approaches concern measuring equipments and ressearches. Orano Mining has a R&D team to develop solutions and improve knowledge in particular for tailings management. Recent water treatment facility upgrade was performed integrating the latest technology regarding flows monitoring and water pounds design.</p>
<p align="center">Principle 7 Design, implement and operate monitoring systems to manage risk at all phases of the facility lifecycle, including closure.</p>		
<p>7.1 Design, implement and operate a comprehensive and integrated performance monitoring programme for the tailings facility and its appurtenant structures as part of the TMS and for those aspects of the ESMS related to the tailings facility in accordance with the principles of Adaptive Management.</p>	<p>●</p>	<p>Bernardan TF is subject to French Mining and Environnemental regulations with Prefectural Orders and Ministerial Acts gathering all monitoring points, inspection, measurements with environnemental report and technical reports frequency as well as visits, inspections frequency leading to annual Site Monitoring commission with stakeholders.</p>

<p>7.2 Design, implement and operate a comprehensive and integrated engineering monitoring system that is appropriate for verifying design assumptions and for monitoring potential failure modes. Full implementation of the Observational Method shall be adopted for non-brittle failure modes. Brittle failure modes are addressed by conservative design criteria.</p>		<p>Orano Mining established the Environnemental and Technical Monitoring system gathered within the guide and stored within the database. Every five years, a VTA is conducted with EOR to check TF and a summary of all results coming from inspection mesurement (topography and flow measurements and phreatic levels) shows that Bernardan TF is in satisfactory condition. The last VTA is conducted in 2020 and the next is scheduled in 2025.</p>
<p>7.3 Establish specific and measurable performance objectives, indicators, criteria, and performance parameters and include them in the design of the monitoring programmes that measure performance throughout the tailings facility lifecycle. Record and evaluate the data at appropriate frequencies. Based on the data obtained, update the monitoring programmes throughout the tailings facility lifecycle to confi rm that they remain effective to manage risk.</p>		<p>Bernardan TF has integrated Management system since 2002. KPIs are set up regarding the TF management system.</p>
<p>7.4 Analyse technical monitoring data at the frequency recommended by the EOR, and assess the performance of the tailings facility, clearly identifying and presenting evidence on any deviations from the expected performance and any deterioration of the performance over time. Promptly submit evidence to the EOR for review and update the risk assessment and design, if required. Performance outside the expected ranges shall be addressed promptly through Trigger Action Response Plans (TARPs) or critical controls.</p>		<p>Orano mining conducts annual inspection as well as VTA led by the EOR every five years. The last inspection was in January 2025 and report is sent to EOR. After VTA with EOR, all modifications will be reported in the OMS manual and transmitted to the french administration. Regular inspections are conducted on a quaterly basis for visual inspection by Bessines team and hydraulic data and on a weekly to quaterly basis for geochemical data.</p>
<p>7.5 Report the results of each of the monitoring programmes at the frequency required to meet company and regulatory requirements and, at a minimum, on an annual basis. The RTFE and the EOR shall review and approve the technical monitoring reports.</p>		<p>Orano mining conducts annual inspection as well as VTA led by the EOR every five years. After VTA with EOR, all modifications will be reported in the OMS manual and transmitted to the french administration. Technical monitoring data include piezometers, flow measurements, visual inspection and annual topographic evolution. Analysis has considered trends in performance since the site remediation.</p>
<p>TOPIC IV: MANAGEMENT AND GOVERNANCE</p>		
<p>Principle 8 Establish policies, systems and accountabilities to support the safety and integrity of the tailings facility</p>		
<p>8.1The Board of Directors shall adopt and publish a policy on or commitment to the safe management of tailings facilities, to emergency preparedness and response, and to recovery after failure.</p>		<p>Orano Mining has established a dedicated tailings facility policy in order to reply to requirement 8.1 of GISTM in 2023</p>
<p>8.2 Establish a tailings governance framework and a performance based TMS and ensure that the ESMS and other critical systems encompapas relevant aspects of the tailings facility management.</p>		<p>Bernardan TF has closed since 2001 and the site remediation was completed in 2002. The TMS is included in the ESMS. ESMS is specific to Bernardan site. The tailings governance framework is based on a experimented and competent staff for TF monitoring and includes assignment of roles and responsibilities until board directors</p>
<p>8.3 For roles with responsibility for tailings facilities, develop mechanisms such that incentive payments or performance reviews are based, at least in part, on public safety and the integrity of the tailings facility. These incentive payments shall reflect the degree to which public safety and the integrity of the tailings facility are part of the role. Long-term incentives for relevant executive managers should take tailings management into account.</p>		<p>Orano Mining developed an integrated annual incentive payments based on objectives of performance and results for roles with responsibility. For concerned people with TFs management, part of the incentives are based on safety and tailing management results.</p>

<p>8.4 Appoint one or more Accountable Executives who is/are directly answerable to the CEO on matters related to this Standard. The Accountable Executive(s) shall be accountable for the safety of tailings facilities and for avoiding or minimising the social and environmental consequences of a tailings facility failure. The Accountable Executive(s) shall also be accountable for a programme of tailings management training, and for emergency preparedness and response. The Accountable Executive(s) must have scheduled communication with the EOR and regular communication with the Board of Directors, which can be initiated either by the Accountable Executive(s), or the Board. The Board of Directors shall document how it holds the Accountable Executive(s) accountable.</p>	<p>●</p>	<p>Orano Mining CEO appoints an Accountable Executive for matter related to Bernardan TF GISTM Standard application. The Accountable Executive reports directly to a Director of the Board and nominates the RTFE who leads the EOR. Roles and responsibilities of the Accountability Executive is documented in a organisational chart. Meeting is planned on a quaterly frequency for the GISTM Standart application.The Accountable Executive is directly in charge of RTFE training program in order to fulfill safety and integrity of the tailings management.</p>
<p>8.5 Appoint a site-specific Responsible Tailings Facility Engineer (RTFE) who is accountable for the integrity of the tailings facility, who liaises with the EOR and internal teams such as operations, planning, regulatory affairs, social performance and environment, and who has regular two-way communication with the Accountable Executive. The RTFE must be familiar with the DBR, the design report and the construction and performance of the tailings facility.</p>	<p>●</p>	<p>RTFE is designated by Accountable Executive. He is the actual Environment Coordinator for after mining department. Roles and responsibilities are documented in a organisational chart. Communication by email exchanges between RTFE and EOR on tailings management are proof of regular communication.</p>
<p>8.6 Identify appropriate qualifications and experience requirements for all personnel who play safety-critical roles in the operation of a tailings facility, including, but not limited to the RTFE, the EOR and the Accountable Executive. Ensure that incumbents of these roles have the identified qualifications and experience, and develop succession plans for these personnel.</p>	<p>●</p>	<p>Internal and external trainings as well as companionship are carried out for staff involved and responsible with TF to ensure people such as RTFE, EOR and Accountable Executive are capable to manage TF. Orano Mining reviews succession plans every 2 years launching additional training plans as necessary. EOR convention specifies that EOR is a certified expert in this domain and explain conditions and succession plans in case of EOR change.</p>
<p>8.7 For tailings facilities with Consequence Classification of 'Very High' or 'Extreme', appoint an Independent Tailings Review Board (ITRB). For all other facilities, the Operator may appoint a senior independent technical reviewer. The ITRB or the reviewer shall be appointed early in the project development process, report to the Accountable Executive and certify in writing that they follow best practices for engineers in avoiding conflicts of interest.</p>	<p>●</p>	<p>For Bernardan : Significant class in consequence classification (breach analysis 2024). ITRB was identified as independent Senior Geological and Geotechnical Engineer which could take support on specific items to other external experts. The convention was signed in July 2023</p>
<p>Principle 9 Appoint and empower an Engineer of Record</p>		
<p>9.1 Engage an engineering firm with expertise and experience in the design and construction of tailings facilities of comparable complexity to provide EOR services for operating the tailings facility and for closed facilities with 'High', 'Very High' and 'Extreme' Consequence Classification, that are in the active closure phase. Require that the firm nominate a senior engineer, approved by the Operator, to represent the firm as the EOR, and verify that the individual has the necessary experience, skills and time to fulfil this role. Alternatively, the Operator may appoint an in-house engineer with expertise and experience in comparable facilities as the EOR. In this instance, the EOR may delegate the design to a firm ('Designer of Record') but shall remain thoroughly familiar with the design in discharging their responsibilities as EOR. Whether the EOR or the DOR is in-house or external, they must be competent and have experience appropriate to the Consequence Classification and complexity of the tailings facility.</p>	<p>●</p>	<p>EOR convention was officially designated in June 2023 to meet the requirement of the Standard. Tractebel Engineering has a extensive experience in installation monitoring as tailings facilities and has certification as an intervener on the safety of hydraulic structures according to french regulation. The EOR is a geotechnical expert specialized in mining facilities and water dam. Tractebel is responsible of the EOR qualifications and is committed to name EOR with expertise for tailings facilities of comparable complexity.</p>

<p>9.2 Empower the EOR through a written agreement that clearly describes their authority, role and responsibilities throughout the tailings facility lifecycle, and during change of ownership of mining properties. The written agreement must clearly describe the obligations of the Operator to the EOR, to support the effective performance of the EOR.</p>		<p>EOR convention describes role and responsibilities of EOR. It is important to specify that french working regulation does not allow to identify a person but a role or entity as responsible.</p>
<p>9.3 Establish and implement a programme to manage the quality of all engineering work, the interactions between the EOR, the RTFE and the Accountable Executive, and their involvement in the tailings facility lifecycle as necessary to confirm that both the implementation of the design and the design intent are met.</p>		<p>EOR Convention appendix specify EOR missions with detailed program. EOR participate every five years to VTA. Email exchanges and minutes of meetings are the proofs of interactions between EOR, RTFE and Accountable Executive and of their involvement in the tailings facility.</p>
<p>9.4 Given its potential impact on the risks associated with a tailings facility, the selection of the EOR shall be decided by the Accountable Executive and informed, but not decided, by procurement personnel.</p>		<p>EOR convention is signed and approved by Orano Mining Director. The selection of the EOR is based on multi-criteria analysis like international certifications and recommendations from intern experts.</p>
<p>9.5 Where it becomes necessary to change the EOR (whether a firm or an inhouse employee), develop a detailed plan for the comprehensive transfer of data, information, knowledge and experience with the construction procedures and materials.</p>		<p>The requirement is clearly identified within the convention</p>
<p>Principle 10 Establish and implement levels of review as part of a strong quality and risk management system for all phases of the tailings facility lifecycle, including closure</p>		
<p>10.1 Conduct and update risk assessments with a qualified multi-disciplinary team using best practice methodologies at a minimum every three years and more frequently whenever there is a material change either to the tailings facility or to the social, environmental and local economic context. Transmit risk assessments to the ITRB or senior independent technical reviewer for review, and address with urgency all unacceptable tailings facility risks.</p>		<p>Risk assessment is partially covered by Environmental impact study updated every 15 years according to French regulation. Environmental impact study update will be performed by the end of 2030. Specifically on tailing facility : Environmental, social and economic impact assessments were described in the breach analysis of BER tailing facility (2024). Climate change evaluation is integrated in the Environmental impact study and stability study. Stability study was completed in 2023.</p>
<p>10.2 Conduct regular reviews of the TMS and of the components of the ESMS that refer to the tailings facility to assure the effectiveness of the management systems. Document and report the outcomes to the Accountable Executive, Board of Directors and project-affected people. The review shall be undertaken by senior technical reviewers with the appropriate qualifications, expertise and resources. For tailings facilities with 'High', 'Very High' or 'Extreme' Consequence Classification, conduct the review at least every three years.</p>		<p>Bernardan TF has closed since 2001 and site remediation was completed in 2002. TMS is included in ESMS. The ESMS is reviewed by RTFE in case of equipment modification, engineering work or anomalies were detected during visual inspection or after monitoring data analyse. ESMS review outcomes is reported to the Accountable Executive and introduced to the public during annual Site Monitoring Commission. In addition, Orano Mining conducts Business Risk Model (BRM) each year. Potential risks are presented to executive board and eventual action plans initiated to reduced those risks.</p>
<p>10.3 Conduct internal audits to verify consistent implementation of company procedures, guidelines and corporate governance requirements consistent with the TMS and aspects of the ESMS developed to manage tailings facility risks.</p>		<p>Orano conducts internal Audits called general inspections. The last three inspections with a scope on tailings management system were led in 2014, 2018 and 2022. These audits analysed all aspects from safety to monitoring results and conformity regarding all different regulations.</p>
<p>10.4 The EOR or senior independent technical reviewer shall conduct tailings facility construction and performance reviews annually or more frequently, if required.</p>		<p>inspection base on VTA is conducted by RTFE and approved by EOR annually</p>



<p>10.5 Conduct an independent DSR at least every five years for tailings facilities with 'Very High' or 'Extreme' Consequence Classifications and at least every 10 years for all other facilities. For tailings facilities with complex conditions or performance, the ITRB may recommend more frequent DSRs. The DSR shall include technical, operational and governance aspects of the tailings facility and shall be completed according to best practices. The DSR contractor cannot conduct consecutive DSRs on the same tailings facility and shall certify in writing that they follow best practices for engineers in avoiding conflicts of interest.</p>		<p>Bernardan TF has closed since 2001 and a remediation with mineral cover was completed in 2002. Bernardan structure is not considered as dam in view of French regulation. Only VTA conduct every five years with EOR.</p>
<p>10.6 For tailings facilities with 'Very High' or 'Extreme' Consequence Classifications, the ITRB, reporting to the Accountable Executive shall provide ongoing senior independent review of the planning, siting, design, construction, operation, water and mass balance, maintenance, monitoring, performance and risk management at appropriate intervals across all phases of the tailings facility lifecycle. For tailings facilities with other Consequence Classifications, this review can be done by a senior independent technical reviewer.</p>		<p>Since 2023, ITRB has attended to VTA (every five years) and has reviewed the EOR report and Orano Mining Monitoring report according to ITRB convention. Every year, RTFE inspection review (visual and data monitoring) is sent to ITRB and reviewed. Annual environmental assessment notably including tailings monitoring is sent to french administration and presented to public at Site Monitoring commission.</p>
<p>10.7 The amount of estimated costs for planned closure, early closure, reclamation, and post-closure of the tailings facility and its appurtenant structures shall be reviewed periodically to confirm that adequate financial capacity (including insurance, to the extent commercially reasonable) is available for such purposes throughout the tailings facility lifecycle, and the conclusions of the review shall be publicly disclosed annually. Disclosure may be made in audited financial statements or in public regulatory filings. Subject to the provisions of local or national regulations on this matter, Operators shall use best efforts to assess and take into account the capability of an acquirer of any of its assets involving a tailings facility (through merger, acquisition, or other change in ownership) to maintain this Standard for the tailings facility lifecycle.</p>		<p>Bernardan TF has closed since 2001 and remediation was completed in 2002. Bernardan TF is in the post-closure phase. Orano Mining provision environmental monitoring for the next thirty years. Accounting experts review and certify Orano Mining accounting results and provisions, including Bernardan TF, each year. In addition and according to french regulation, Orano Mining provides french administration with Financial Guarantees for 30 years monitoring renewed every 5 years.</p>
<p>Principle 11 DEVELOP AN ORGANISATIONAL CULTURE THAT PROMOTES LEARNING, COMMUNICATION AND EARLY PROBLEM RECOGNITION.</p>		
<p>11.1 Educate personnel who have a role in any phase of the tailings facility lifecycle about how their job procedures and responsibilities relate to the prevention of a failure.</p>		<p>Orano revises and validates annually a training program for every personnel. For TF specifically, the training program ensures people are properly trained for all monitoring and supervision aspects. Following the GISTM requirements, the RTFE will provide in 2025 a training to personnel involved in TFs monitoring.</p>
<p>11.2 Establish mechanisms that incorporate workers' experience-based knowledge into planning, design and operations for all phases of the tailings facility lifecycle.</p>		<p>TF operations are reviewed regularly with internal experts, i.e. workers with long-time and recognised experience on the domain. Additionnaly, any TF expansion, or major modification are led through Steering Committees and Gate Reviews who appoint trained and experienced workers as project leaders and managers.</p>
<p>11.3 Establish mechanisms that promote cross-functional collaboration to ensure effective data and knowledge sharing, communication and implementation of management measures to support public safety and the integrity of the tailings facility.</p>		<p>Data monitoring are stored on a share file and all after mining departement employees have access to it. Post mining departement gathers various jobs and competences (engineering work team, geologists, industrial maintenancers, water treatment expert, data manager, communication managers, land and legal expert) centralized in the same place to provide technical support to field teams. All actual subjects and projects are presented and discussed in a monthly meeting in order to share knowledge. TF management is a permanent part of this meeting.</p>
<p>11.4 Identify and implement lessons from internal incident investigations and relevant external incident reports, paying particular attention to human and organisational factors.</p>		<p>Health And safety policy ensures that all events or incidents are registered and followed with action plan within a software. Causes and Consequences Analyse meetings are set up at every incident in order to share experiences, analyse and register the event.</p>

<p>11.5 Establish mechanisms that recognise, reward and protect from retaliation, employees and contractors who report problems or identify opportunities for improving tailings facility management. Respond in a timely manner and communicate actions taken and their outcomes.</p>		<p>Orano's ethics whistleblowing system is based on a secure reporting portal accessible to all group employees, as well as to employees of business partners. It covers all the topics of the Code of Ethics and in particular the topics of the Sapin II law and the law on the duty of care. It also guarantees confidentiality in the processing of information and the protection of whistleblowers acting in good faith. All employees must follow up every 2 years an online Ethics code training provided by the company.</p>
<p>Principle 12 ESTABLISH A PROCESS FOR REPORTING AND ADDRESSING CONCERNS AND IMPLEMENT WHISTLEBLOWER PROTECTIONS.</p>		
<p>12.1 The Accountable Executive shall establish a formal, confidential and written process to receive, investigate and promptly address concerns from employees and contractors about possible permit violations or other matters relating to regulatory compliance, public safety, tailings facility integrity or the environment.</p>		<p>Orano's ethics whistleblowing system is based on a secure reporting portal accessible to all group employees, as well as to employees of business partners. It covers all the topics of the Code of Ethics and in particular the topics of the Sapin II law and the law on the duty of care. It also guarantees confidentiality in the processing of information and the protection of whistleblowers acting in good faith. All employees must follow up every 2 years an online Ethics code training provided by the company.</p>
<p>12.2 In accordance with international best practices for whistleblower protection, the Operator shall not discharge, discriminate against, or otherwise retaliate in any way against a whistleblower who, in good faith, has reported possible permit violations or other matters relating to regulatory compliance, public safety, tailings facility integrity or the environment.</p>		<p>Orano's ethics whistleblowing system is based on a secure reporting portal accessible to all group employees, as well as to employees of business partners. It covers all the topics of the Code of Ethics and in particular the topics of the Sapin II law and the law on the duty of care. It also guarantees confidentiality in the processing of information and the protection of whistleblowers acting in good faith. All employees must follow up every 2 years an online Ethics code training provided by the company.</p>
<p>TOPIC V: EMERGENCY RESPONSE AND LONG-TERM RECOVERY</p>		
<p>Principle 13 PREPARE FOR EMERGENCY RESPONSE TO TAILINGS FACILITY FAILURES.</p>		
<p>13.1 As part of the TMS, use best practices and emergency response expertise to prepare and implement a site-specific tailings facility Emergency Preparedness and Response Plan (EPRP) based on credible flow failure scenarios and the assessment of potential consequences. Test and update the EPRP at all phases of the tailings facility lifecycle at a frequency established in the plan, or more frequently if triggered by a material change, either to the tailings facility or to the social, environmental and local economic context. Meaningfully engage with employees and contractors to inform the EPRP, and co-develop community-focused emergency preparedness measures with project-affected people.</p>		<p>Bernardan EPRP in case of TF failure is a part of the overall Bernardan site emergency response plan. This EPRP is currently being updated. The worst scenario described in the breach analysis (2024) is used as a reference. It is important to specify that french working regulation does not allow to identify a person but a role or entity as responsible. Phone numbers of every roles and entities will be updated. A map will be included showing tailings perimeter, impact area of the worst failure scenario, access, fence and dosimeters localisation. Annually EPRP update is conducted. No test with french administration are conducted as a probability of failure is extremely low.</p>
<p>13.2 Engage with public sector agencies, first responders, local authorities and institutions and take reasonable steps to assess the capability of emergency response services to address the hazards identified in the tailings facility EPRP, identify gaps in capability and use this information to support the development of a collaborative plan to improve preparedness.</p>		<p>Public sector agencies, first responders, local authorities and institution that would participate in the emergency responses to TF failures are listed and integrated in the EPRP. Orano team have relationship with member of this list for a long time because Bernardan exploitation began in 1978 and Orano Mining activities for maintenance and monitoring is always engaged nowadays. Disclosures of relevant information about hazards identified in the EPRP and potential emergency response scenarios are shared to french administration but not for first responders as fireman for example. The emergency teams is located on Bessines industrial site. Bessines industrial site is located 30 km from Bernardan TF. The capability of emergency teams has been approved.</p>
<p>13.3 Considering community-focused measures and public sector capacity, the Operator shall take all reasonable steps to maintain a shared state of readiness for tailings facility credible flow failure scenarios by securing resources and carrying out annual training and exercises. The Operator shall conduct emergency response simulations at a frequency established in the EPRP but at least every 3 years for tailings facilities with potential loss of life.</p>		<p>EPRP is shared with the French administration. Orano Mining is fully conformed regarding French regulation. In the breach analysis (2024), Bernardan TF doesn't have a potential loss of life including for the worst-case scenario. No test with french administration are conducted as a probability of failure is extremely low. Orano Mining safety department is in charge of the simulation minutes and on a need basis, manager of after mining department is in charge of EPRP and training support update. No frequency is set for the TF failure but every year, one part of the mine site emergency response plan is tested through a simulation.</p>
<p>13.4 In the case of a catastrophic tailings facility failure, provide immediate response to save lives, supply humanitarian aid and minimise environmental harm.</p>		<p>Bernardan TF has closed since 2001 and a remediation with a mineral cover was completed in 2002. Breach analysis demonstrates that the worst scenario impact doesn't involve potential lost of life and Bernardan TF fall into "Significant" class because of potential population at risk, health, social and cultural impacts. In case of a catastrophic TF failure, Orano Mining will inform immediately the local authorities in order to launch the Crisis Unit which will coordinate and supervise actions in order to save lives and supply aid. Orano will provided its expertise to minimise environmental harm. Capability and disponibility of external emergency service is ensured by french administration. Orano Mining emergency organisation is based on ; at least one person of the board executive direction and members of a site crisis unit members list</p>

Principle 14 PREPARE FOR LONG-TERM RECOVERY IN THE EVENT OF CATASTROPHIC FAILURE.		
14.1 Based on tailings facility credible flow failure scenarios and the assessment of potential consequences, take reasonable steps to meaningfully engage with public sector agencies and other organisations that would participate in medium- and long-term social and environmental post-failure response strategies.	⊗	The worst scenario of failure is a 60 m landslide without mudflow. Public sector agencies and other organisations that would participate in planning and delivery of any post-failure response strategies are known. Public sector agencies know Bernardan site and attend to Site monitoring commission annually.
14.2 In the event of a catastrophic tailings facility failure, assess social, environmental and local economic impacts as soon as possible after people are safe and short-term survival needs have been met.	●	Social, environmental and local economic impacts predictions for the worst TF failure scenario is described in the breach analysis. In view of described impacts in the breach analysis, the post failure assessment of impact would be started quickly after failure.
14.3 In the event of a catastrophic tailings facility failure, work with public sector agencies and other stakeholders to develop and implement reconstruction, restoration and recovery plans that address the medium- and long-term social, environmental and local economic impacts of the failure. The plans shall be disclosed if permitted by public authorities.	●	The worst scenario of failure is a 60 m landslide without mudflow and the potential impact area is closed to 0,025 km ² and principal consequences are potential population at risk, health, social and cultural impacts. In response of scenario, Orano Mining plan contains remediation actions, the reinforcement of environmental monitoring (water, air and biomass), critical control points and instrumental measurements (dosimeters, flow meters and piezometers). The remediation plan disclosure to french administrative is not an obligation in regard of french regulation.
14.4 In the event of a catastrophic tailings facility failure, enable the participation of affected people in reconstruction, restoration and recovery works and ongoing monitoring activities.	●	In breach analysis, affected people concern a range of 1 to 10 people : potentially site workers. In case of a catastrophic event Orano will ensure affected people are integrated within the different remediation program
14.5 Facilitate the monitoring and public reporting of post-failure outcomes that are aligned with the thresholds and indicators outlined in the reconstruction, restoration and recovery plans and adapt activities in response to findings and feedback.	●	Orano Mining will ensure that monitoring and public reporting of post failure outcomes (during Site Monitoring Commission) will be aligned with the thresholds and indicators outlined in the restoration plan. Indicators will include environmental monitoring, critical control point review and instrumental measurements and indicators depending on the social and local economic impacts. Orano Mining will ensure that restoration and monitoring programs will be adjusted according to findings and feedback from monitoring outcomes and public reporting.

TOPIC VI: PUBLIC DISCLOSURE AND ACCESS TO INFORMATION

Principle 15		
<p>15.1 Publish and regularly update information on the Operator's commitment to safe tailings facility management, implementation of its tailings governance framework, its organisation-wide policies, standards or approaches to the design, construction, monitoring and closure of tailings facilities.</p> <p>A. For new tailings facilities for which the regulatory authorisation process has commenced, or that are otherwise approved by the Operator, the Operator shall publish and update, in accordance with Principle 21 of the UNGP, the following information:</p> <p>1. A plain language summary of the rationale for the basis of the design and site selected as per the multi-criteria alternatives analysis, impact assessments, and mitigation plans (Information may be obtained from the output of multiple Requirements including, but not limited to, Requirements 3.2, 3.3, 5.1, 5.3, 6.4, 6.6, 7.1 and 10.1); and</p> <p>2. The Consequence Classification. (Requirement 4.1).</p> <p>B. For each existing tailings facility and in accordance with Principle 21 of the UNGP, the Operator shall publish and update at least on an annual basis, the following information:</p> <p>1. A description of the tailings facility (information may be obtained from the output of Requirements 5.5 and 6.4);</p> <p>2. The Consequence Classification (Requirement 4.1);</p> <p>3. A summary of risk assessment findings relevant to the tailings facility (Information may be obtained from the output of Requirement 10.1);</p> <p>4. A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow failure scenarios (Information may be obtained from the output of Requirements 2.4 and 3.3);</p> <p>5. A description of the design for all phases of the tailings facility lifecycle including the current and final height (Information may be obtained from the output of Requirement 5.5);</p> <p>6. A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP (Information may be obtained from output of Requirements 10.4</p>	●	Orano Mining publishes, according to principle 15, the results of Bernardan conformity regarding GISTM standard. The disclosure report should be published by the end of 2025.

<p>15.2 Respond in a systematic and timely manner to requests from interested and affected stakeholders for additional information material to the public safety and integrity of a tailings facility. When the request for information is denied, provide an explanation to the requesting stakeholder.</p>		<p>Orano Mining has setup for few years several channels of communication: oral contact, mail, phone and a generic email adress for stakeholders to raise questions and concerns: g-orn-mn-amf@orano.group .Any request is recorded, analysed and answered accordingly. In addition, annual Site Monitoring Committees meetings are set up by local Prefects (government representatives) and provides Orano Mining the opportunity to present safety, environmental and projected remediation plans to involved stakeholders. Prior to the annual Site Monitoring Committees, all stakeholder college representatives discuss the Site Monitoring Committee's agenda and can raise questions which will be answered by Orano Mining during the annual session.</p>
<p>15.3 Commit to cooperate in credible global transparency initiatives to create standardised, independent, industry-wide and publicly accessible databases, inventories or other information repositories about the safety and integrity of tailings facilities.</p>		<p>Orano provides all information to the French authorities in order to complete National Databases such as ASNR's MIMAUSA and RNMRE.</p> <p>Orano Mining monitoring results presentation are available on Préfecture de la Haute Vienne website and presented annually to the Site Monitoring Committees.</p> <p>Bernardan TF is a fully-integrated part of PNGMDR national plan monitored by ASNR authority. Safety and integrity documents regarding this facility have been shared and publically disclosed (https://www.asn.fr/espace-professionnels/installations-nucleaires/le-plan-national-de-gestion-des-matieres-et-dechets-radioactifs#pngmdr-2016-2018)</p> <p>Orano Mining After Mining Department created an online plateforme with all mapping information (https://www.orano.group/fr/l-expertise-nucleaire/de-l-exploration-au-recyclage/producteur-d-uranium-de-reference/apres-mines-france-orano-mining) and shares information during organised regular on-site visits of official representatives or students.</p>