

Principle 11 DEVELOP AN ORGANISATIONAL CULTURE THAT PROMOTES LEARNING, COMMUNICATION AND EARLY PROBLEM RECOGNITION.		
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.	●	The Facility and Dam monitoring and supervision program gathers all informations needed for operator. Orano HR training program ensures people are properly trained for all monitoring and supervision aspects
11.2 Establish mechanisms that incorporate workers' experience-based knowledge into planning, design and operations for all phases of the tailings facility lifecycle.	●	TSF operations are reviewed regularly with internal experts, i.e. workers with long-time and recognised experience on the domain. Additionnaly, any TSF expansion, or major modification are led through Steering Committees and Gate Reviews who appoint trained and experienced workers as project leaders and managers.
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.	●	Weekly and monthly meetings are set up in order to share knowledge on TSF and other After Mining perimeter. These meetings are registered in minutes of the meetings.
11.4 Identify and implement lessons from internal incident investigations and relevant external incident reports, paying particular attention to human and organisational factors.	●	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.
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.	●	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.
Principle 12 ESTABLISH A PROCESS FOR REPORTING AND ADDRESSING CONCERNS AND IMPLEMENT WHISTLEBLOWER PROTECTIONS.		
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.	●	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.
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.	●	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.
TOPIC V: EMERGENCY RESPONSE AND LONG-TERM RECOVERY		
Principle 13 PREPARE FOR EMERGENCY RESPONSE TO TAILINGS FACILITY FAILURES.		
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.	●	According to french Dam regulation Orano Mining has to set up The Facility and Dam monitoring and supervision program based on Etude de Dangers (EDD) or Risk Assessment Study. An Emergency Preparedness Response Plan (EPRP) is established in order to complete the Facility and Dam monitoring and supervision program with emergency plan and Crisis Monitoring synoptic. Annual test (alarms tests) of EPRP security facilities are set both by Orano and/or administration during inspection. This EPRP is reviewed periodically following major site changes or taking into account emergency tests return of experiences. In case of an emergency, Orano Mining will timely inform the french administration who make take the lead.
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.	●	Facility and Dam monitoring and supervision program is sent to local authorities at every modifications.
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.	◐	EPRP is shared with the French administration. Orano Mining is fully conformed regarding French regulation. An emergency exercise has been done in 2020 with French administration and consists of calling the emergency number of the Prefecture. No more detailed emergency response simulation is needed regarding as the probability of a dam failure is extremely rare.
13.4 In the case of a catastrophic tailings facility failure, provide immediate response to save lives, supply humanitarian aid and minimise environmental harm.	●	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.
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.	●	EPRP integrates a post-accident program
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.	●	Post accident program is based on last risk assessment covering all social environmental and local aspects
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.	◐	With no legal need in french regulation regarding this facility, the EPRP plan is not disclosed.
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 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 will ensure that monitoring and reporting will be aligned this the thresholds and indicators.
TOPIC VI: PUBLIC DISCLOSURE AND ACCESS TO INFORMATION		
Principle 15		
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. 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: 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 2. The Consequence Classification. (Requirement 4.1). 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: 1. A description of the tailings facility (information may be obtained from the output of Requirements 5.5 and 6.4); 2. The Consequence Classification (Requirements 4.1); 3. A summary of risk assessment findings relevant to the tailings facility (Information may be obtained from the output of Requirement 10.1);	●	Orano Mining publishes, according to principle 15, the results of Bois Noirs conformity regarding GISTM standard.
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.	●	Orano Mining has setup for few years several channels of communication: oral contact, mail, phone and a generic email address 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.
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.	●	Orano provides all information to the French authorities in order to complete National Databases such as IRSN's MIMAUSA, ASN's RNMRE. Orano Mining monitoring results presentation are available on Préfecture de la Loire website and presented annually to the Site Monitoring Committees. Bois Noirs TSF is a fully-integrated part of PNGMDR national plan monitored by ASN 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) 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.