





International Council on Mining and Metals - Mining principles and performance expectations implementation
Orano Mining

































Self-assessment year 2021

-  Meets
-  Partially meets
-  Does not meet
-  Not applicable

Locations / sites

Somair Niger 2020 Katco Kazakhstan 2021 Mc Clean Lake Canada 2021 Orano Mining Corporate

Comments

ICMM Mining Principles					
Principle 1 Ethical business : Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development					
1.1 Establish systems to maintain compliance with applicable law Applicability: Corporate and Asset level					This commitment is made at the very highest level by the Board of Directors of Orano. It relies on four specialized committees including the Audit and Ethics Committee. Orano Mining, like all the Business Units of the Group, conducts an internal ethical reporting process on the proper application of the Code Ethics and Business Conduct, any infringements observed, action plans put in place to remedy such breaches, and the sanctions imposed For more information see Orano Mining CSR report - p 24
1.2 Implement policies and practices to prevent bribery, corruption and to publicly disclose facilitation payments Applicability: Corporate and Asset level					Orano has taken a proactive approach in developing its own Code Ethics and Business Conduct and its anticorruption program and communicating these to all its employees, as well its industrial and commercial partners. For more information see Orano Mining CSR report - p 24
1.3 Implement policies and standards consistent with the ICMM policy framework Applicability: Corporate level					As a responsible mining company, Orano Mining is committed to implementing the Position Statements defined by the ICMM, as well as the 10 mining principles and their performance expectations. For more information see Orano Mining CSR report - p 27
1.4 Assign accountability for sustainability performance at the Board and/or Executive Committee level Applicability: Corporate level					The Board of Directors of Orano guides and controls the actions of the Group's Committees and its results, including in non-financial matters. Environmental, Social and Governance (ESG) matters are managed on an ad-hoc basis by each of the specialized committees of the Board of Directors depending on the topic. For more information, see Orano annual report, chapter 4.1.4, p. 98 and Orano Mining CSR report - p 29
1.5 Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary Applicability: Corporate level					Orano Mining does not favor any political party, group or individual and does not make any direct or indirect payment to political parties or to candidates in any of the countries in which we are present. For more information see Orano Mining CSR report - p 29
Principle 2 Decision-making : Integrate sustainable development in corporate strategy and decision-making processes					
2.1 Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities Applicability: Corporate level					Because it is convinced that protection of the climate, resources and health are issues of fundamental importance, Orano has made addressing them central to its purpose and intends to use and develop know-how in the transformation and control of nuclear materials for the climate, for a healthy and resource-efficient world, now and tomorrow. For more information see Orano Mining CSR report - p 32
2.2 Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices by joint venture partners, suppliers and contractors, based on risk Applicability: Corporate and Asset level					Orano Mining's supply chain works closely with the HSE, Legal and Compliance Departments to ensure that suppliers meet compliance requirements, particularly with regard to the prevention of corruption and influence peddling. Suppliers are assessed based on the criteria of quality, conformance, competitiveness, safety and the environment, and on their ability to supply products and services that meet the needs and specified requirements. Orano Mining set the following objective for 2025 : to expand the inclusion of CSR criteria in calls for tender totaling more than €1 million in Orano Mining subsidiaries, depending on the local legislation in force. For more information see Orano Mining CSR report - p 34
Principle 3 Human rights : Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities.					
3.1 Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to. Applicability: Corporate and Asset level					Orano conducts its business in compliance with the fundamental texts aimed at protecting human rights, namely: - the Universal Declaration of Human Rights adopted by the UN in 1948; - the fundamental conventions of the International Labour Organization (ILO); - the Guidelines for Multinational Enterprises issued by the Organization for Economic Co-operation and Development (OECD) For more information see Orano Mining CSR report - p 38

<p>3.2 Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people</p> <p>Applicability: Asset level</p>	●	●	●	⊗	<p>Orano Mining is committed to avoid involuntary resettlement. Where resettlement can be avoided, a dedicated ation plan is implemented.</p> <p>For more information see Orano Mining CSR report - p 39</p>
<p>3.3 Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.</p> <p>Applicability: Asset level</p>	◐	◐	◐	⊗	<p>Orano Mining regularly assesses risks identified with regard to the Voluntary Principles on Security and Human Rights in the countries where it is present, as an essential part of ensuring the safety of personnel, and of local communities.</p> <p>As of human rights, Orano considers there is room for continuous improvement. As an action of progress, Orano Mining is considering the implementation of a mandatory training course focused on human rights to its personnel to promote its values and encourage the upholding of their rights and those of others.</p>
<p>3.4 Respect the rights of workers by: not employing child or forced labour; avoiding human trafficking; not assigning hazardous/dangerous work to those under 18; eliminating harassment and discrimination; respecting freedom of association and collective bargaining and; providing a mechanism to address workers grievances.</p> <p>Applicability: Corporate and Asset level</p>	◐	◐	◐	●	<p>Orano conducts its business in compliance with the fundamental texts aimed at protecting human rights. It reflects the company's commitment to eliminating child labor and all forms of forced or imposed labor, adherence to free association, privacy, and the right for collective bargaining. Orano is a responsible group in terms of Ethics and Compliance. Our group operates in strict compliance with Human Rights, as defined in the UN-adopted Universal Declaration of Human Rights. Orano defends the principles of the United Nations GlobalCompact and adheres to the OECD Guidelines for Multinational Enterprises and to the Extractive Industries Transparency Initiative (EITI).</p> <p>As of human rights, Orano considers there is room for continuous improvement. The assessment on discrimination / harrassment is being conducted on our sites and an action plan will be implemented according to the findings to address the potential issues and reinforce the actions that are already in place.</p>
<p>3.5 Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>The purpose of Orano's remuneration policy, applied within Orano Mining. It is founded on three pillars: remunerate performance, guarantee internal fairness, and help to make Orano more attractive in particular on the market for technicians, managers and engineers.</p> <p>The majority of employees are covered by legislation guaranteeing minimum pay. Where this is not the case, in particular in Namibia, Orano Mining guarantees a level of remuneration superior to the minimum seen locally. Internally, fair treatment is ensured by processes of performance assessment.</p> <p>For more information see Orano Mining CSR report - p 44</p>
<p>3.6 Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts and; deliver sustainable benefits for Indigenous Peoples.</p> <p>Applicability: Asset level</p>	⊗	⊗	●	⊗	<p>Orano recognizes a responsibility to the Indigenous Peoples in areas in which we have activities and is committed to working in partnership with Indigenous Peoples in the spirit of reconciliation and collaboration.</p> <p>For more information see Orano Mining CSR report - p 47 and visit our website https://www.orano.group/canada/en/our-commitments/community-engagement</p>
<p>3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage, and capture the outcomes of engagement and consent processes in agreements.</p> <p>Applicability: Asset level</p>	⊗	⊗	●	⊗	<p>Orano is a partner in the Pinehouse (2012), English River First Nations (2013) and the Ya'Thi Néné (2016) Collaboration Agreements.</p> <p>For more information see Orano Mining CSR report - p 47 and visit our website https://www.orano.group/canada/en/our-commitments/community-engagement</p>
<p>3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano Mining applies the group's policy and our Human Resources teams promote diversity during the course of exercising their functions by taking care to develop employees' skills and career paths in a way that excludes any discrimination related in particular to origin, gender, race, sexual orientation or identity, disability, age, or belonging to a political, trade union, or religious organization or to a minority.</p> <p>For more information see Orano Mining CSR report - p 50</p>
<p>Principle 4 Risk management : Implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks.</p>					
<p>4.1 Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano created a risk management system with the recommendations of the Autorité des marchés financiers (AMF the French financial market authority), the professional standards of the Committee of Sponsoring Organizations of the Treadway Commission (COSO), and the changes in regulations concerning the non-financial performance statement and the corporate duty of care. An internal campaign to identify and assess risks of all kinds is conducted annually using a Business Risk Model (BRM). Orano also carries out environmental impact studies throughout the life of mining and industrial projects. They meet the regulatory requirements and are submitted for public consultation to obtain approval from the local authorities.</p> <p>For more information see Orano Mining CSR report - p 56</p>
<p>4.2 Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High- Risk Areas, when operating in, or sourcing from, a conflict-affected or high- risk area</p> <p>Applicability: Corporate and Asset level</p>	⊗	⊗	⊗	⊗	<p>Orano does not intend to act as an importer of metals as defined in Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017.</p> <p>For more information see Orano Mining CSR report - p 58</p>

<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/ or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system</p> <p>Applicability: Asset level</p>	●	●	●	⊗	<p>Implement risk-based controls to prevent, minimise, mitigate health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p> <p>For more information see Orano Mining CSR report - p 59</p>
<p>4.4 Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice</p> <p>Applicability: Asset level</p>	●	●	●	⊗	<p>Within Orano Mining, each operating entity sets up an organization to manage emergency situations and has elaborated emergency responses plan with potential affected stakeholders.</p> <p>For more information see Orano Mining CSR report - p 62</p>
<p>Principle 5 Health & Safety : Pursue continual improvement in health and safety performance with the ultimate goal of zero harm.</p>					
<p>5.1 Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>The Health, Safety and Radiation Policy is implemented by the sites through their management systems, which take into account specific features and regulations in local areas, as well as the requirements of standards ISO 14001 and/or ISO 45001. Operational health, safety and radiation protection action plans, with measurable results across all our sites, are also drawn up.</p> <p>For more information see Orano Mining CSR report - p 66</p>
<p>5.2 Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano Mining raises awareness regarding occupational health and safety at all our sites through actions aimed at subcontractors and employees to encourage them to take the initiative.</p> <p>For more information see Orano Mining CSR report - p 72</p>
<p>Principle 6 Environmental performance : Pursue continual improvement in environmental performance issues, such as water stewardship, energy use and climate change.</p>					
<p>6.1 Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano Mining undertakes to plan and design end-of-life of sites in consultation with the authorities and stakeholders concerned, implement all measures related to respect for the environmental and social challenges and guarantee the financial resources needed to meet commitments made for the closure and remediation of sites.</p> <p>For more information see Orano Mining CSR report - p 80 and our focus on Cominak closure and remediation plan p 90</p>
<p>6.2 Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>As a member of the ICMM, Orano Mining endeavors to implement the requirements listed in the ICMM principles. The management of water resources is a big challenge given that, 70% of Orano Mining sites are at high water risks. Each site establishes its water resource management plan, taking account of the issues, risks and regulatory requirements that apply and setting suitable objectives that are compatible with those set by Orano Mining : -10% of global consumption and -10%/tU.</p> <p>For more information see Orano Mining CSR report - p 98</p>
<p>6.3 Design, construct, operate, monitor and decommission tailings disposal/ storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure</p> <p>Applicability: Corporate and Asset level</p>	◐	◐	◐	◐	<p>As an ICMM member, Orano Mining is committed to implementing the Global Industry Standard on Tailings Management (GISTM). A procedure is in place and shared with our subsidiaries to implement the GISTM according to the schedule established by ICMM.</p> <p>In 2021, according to our roadmap, 100% of the tailings dams were assessed in Niger.</p> <p>For more information see Orano Mining CSR report - p 106 an visit ou website https://www.orano.group/en/nuclear-expertise/from-exploration-to-recycling/leading-uranium-producer-/uranium-tailing-facilities-dams</p>
<p>6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment</p> <p>Applicability: Asset level</p>	◐	●	●	⊗	<p>Orano Mining assumes responsibility for its own waste and manages it effectively, in accordance with the regulations, whether it is radioactive or conventional waste. Our site teams ensure that waste is traceable through to its definitivedisposal or recovery. This is part of their environmental management plan (ISO 14001). We apply the waste management hierarchy (prevent, reuse, recycle and dispose) to prevent pollution, manage discharges and waste, and respond to any impacts on human health and the environment.</p> <p>For more information see Orano Mining CSR report - p 110</p>
<p>6.5 Implement measures to improve energy efficiency and contribute to a low- carbon future, and report the outcomes based on internationally recognised protocols for measuring CO2 equivalent (GHG) emissions</p> <p>Applicability: Corporate and Asset level</p>	◐	◐	◐	◐	<p>As a supplier of decarbonized electricity, Orano is committed to carbon neutrality with an objective to reduce its direct and indirect (scope 1 and 2) GHG emissions by 40% by 2025 compared to 2015. These objectives are applied within Orano Mining and at its sites.</p> <p>For more information see Orano Mining CSR report - p 113</p>
<p>Principle 7 Nature : Contribute to the conservation of biodiversity and integrated approaches to land-use planning.</p>					

<p>7.1 Neither explore nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano Mining’s approach is fully in line with the recommendations of the IFC (International Finance Corporation) Performance Standard 6 on “Biodiversity Conservation and Sustainable Management of Living Natural Resources”.</p> <p>For more information on Orano Mining biodiversity strategy - CSR report - p 123</p>
<p>7.2 Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no- net-loss of biodiversity</p> <p>Applicability: Corporate and Asset level</p>	◐	◐	◐	◐	<p>Our central and operational teams work together to “avoid - minimize - remediate/restore - offset” and preserve ecosystems. This approach is integrated beginning with the impact study which is performed by multidisciplinary teams of experts who assess the impacts and propose mitigation actions.</p> <p>For more information, see Orano Mining CSR report - p 124</p>
<p>Principle 8 Responsible production : Facilitate and support the knowledge-base and systems for responsible design, use, re-use, recycling and disposal of products containing metals and minerals.</p>					
<p>8.1 In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials.</p> <p>Applicability: Corporate and Asset level</p>	◐	◐	◐	◐	<p>Orano, is working on updating the eco-design guidelines and Orano Mining is fully involved in this work that is scheduled to be finalized in 2022. According to its roadmap, 100% of Orano Mining projects worth + € 5M were eco-designed.</p> <p>For more information, see Orano annual report, chapter 4.1, p. 86</p>
<p>8.2 Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Our operating sites comply with international and national requirements regarding the classification and labeling of the chemical products used and/or produced.</p> <p>For more information, see Orano Mining CSR report - p 133</p>
<p>Principle 9 Social performance : Pursue continual improvement in social performance and contribute to the social, economic and institutional development of host countries and communities.</p>					
<p>9.1 Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano deploys mapping to identify the expectations and power of stakeholders at national and local level. It enables each site to establish strategic priorities on environmental, labor relations, social, economic and governance-related questions, and define an action plan associated with the results.</p> <p>For more information, see Orano Mining CSR report - p 136</p>
<p>9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life-cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Preference is given - providing skill levels are comparable - to local suppliers during the bidding process enables the creation of a network of companies and numerous jobs in the region around each mining site.</p> <p>See Orano Mining CSR report - p 141</p>
<p>9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities</p> <p>Applicability: Asset level</p>	◐	◐	◐	⊗	<p>Orano Mining complies with international best practices in the extractive industries and values transparency and dialogue with its stakeholders. The management of grievances plays an essential part in the quality of our relations with our stakeholders. Orano Mining deployed a grievance mechanism on all of its sites in 2020 to resolve complaints at an operational level. 2021 was the 1st year of report and we’re in a process of continuous improvement.</p> <p>For more information, see Orano Mining CSR report - p 144</p>
<p>9.4 Collaborate with government, where appropriate, to support improvements in environmental and social practices of local Artisanal and Small-scale Mining (ASM).</p> <p>Applicability: Asset level</p>	●	⊗	⊗	⊗	<p>Orano Mining has long been explicitly opposed to the practices of certain artisanal mines, particularly those that practice gold panning, because of the health, environmental and human rights problems encountered.</p> <p>Although, to our knowledge, artisanal and small-scale mining does not involve uranium in the vicinity of the SOMAÏR and COMINAK sites in Arlit in Niger, we have decided to support, in conjunction with the authorities who implement them, training and awareness-raising modules on the control of safety, health and environmental risks.</p> <p>See Orano Mining CSR report - p 145</p>
<p>Principle 10 Stakeholder engagement : Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner. Effectively report and independently verify progress and performance.</p>					
<p>10.1 Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner.</p> <p>Applicability: Corporate level</p>	⊗	⊗	⊗	●	<p>To ensure the acceptability and sustainability of its business activities, Orano Mining is committed to a process of dialogue, consultation and sharing with its stakeholders. Dedicated dialogue bodies are in place throughout the mining lifecycle from exploration to mine closure on all our sites.</p> <p>For more information on our on CSR policy, see the Orano Mining CSR report - p 148</p>
<p>10.2 Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project.</p> <p>Applicability: Corporate and Asset level</p>	●	●	●	●	<p>Orano Mining is committed to transparency and supports the EITI (Extractive Industries Transparency Initiative) framework since its creation in 2003. Orano Mining publishes its earnings from mining.</p> <p>See Orano Mining CSR report - p 153</p>

<p>10.3 Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards.</p> <p>Applicability: Corporate level</p>	⊗	⊗	⊗	●	<p>Orano Mining CSR report has been prepared in accordance to the Global Reporting Initiative (GRI) standards - core option, and the GRI G4 Mining and Metals Sector Disclosures.</p>
<p>10.4 Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and verifying membership requirements</p> <p>Applicability: Corporate level</p>	⊗	⊗	⊗	●	<p>Besides the independent verification of the content of Orano Mining CSR report, Orano Mining has commissioned the third party to audit a set of extra-financial indicators in compliance with the ICMM Audit procedure and the AA1000 ethical auditing principles.</p> <p>See Orano Mining CSR report - KPMG assurance statement p 155.</p>