## DALRADIAN

# Responsible Business Report 2022



Carbon Neutral Organisation

INVESTORS IN PEOPLE We invest in people Gold

## Dalradian's proposed goldsilver-copper mine is **one of the largest-ever US investments in Northern Ireland**.

Over 13 years of working in West Tyrone, we have **advanced our regionally significant project to the final stages of planning,** with the aim of becoming one of the **world's top underground mines** utilizing the best available technology for modern mining. In addition to precious metals, Dalradian has also been actively exploring throughout our licence area for **base metals, rare earths** and other **critical minerals.** 

Dalradian are controlled by USbased Orion Resource Partners, a global alternative investment firm dedicated to metals and materials. Orion has been accepted as a signatory to the UN's Principles for Responsible Investment (PRI), in line with their assimilation of sustainability-driven considerations into their investment practices.

a broad range of indicators to support current and future operating permits

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### **Our Vision**

We aim to build a modern mine that draws on Tyrone's heritage of engineering and manufacturing excellence to **drive** economic growth and community development in the local area and beyond.

#### About this report

Dalradian's 2022 Responsible Business Report explains our business, strategy, activities and performance in a number of areas, including environmental, social and corporate governance for the period January to December 2022.

The report includes key metrics and case studies that illustrate Dalradian's long-term, responsible approach to modern mining.

A hawthorne seedling in Dalradian's native tree nursery.

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# SUSTAINABLE GOALS



In 2015, the United Nations laid out 17 Sustainable Development Goals (SDGs) to promote peace & prosperity for people & the planet now and into the future. Starting with this 2022 Responsible Business Report, we are incorporating the UN SDGs into our reporting to make it easier to see how our current activities contribute, and our future mine will contribute, to building a sustainable future. As detailed in this report, Dalradian did contribute in 2022 or will be contributing through the proposed mine to 13 of the 17 UN SDGs (shown in bold colour).

#### For more on the SDGs





522

suppliers in Northern Ireland have contributed to the project to date

Total of

employed to date directly

£1.2m

in funding provided to more than 650 community groups (2011-2022)



4th year in a row certified

Service House



Carbon Neutral Plus



8



minimum committed to future community projects

Maintained 3-year IIP certification. Reaccredited to

IIP Gold level in June 2022





1,000 jobs to be created in

operations, with a £15m training budget to maximize local employment



# £750m

planned expenditure on supply chain





future jobs in construction

## CEO Foreword

Our carbon neutral, high tech gold-silvercopper project will produce minerals needed for everyday life, including potential contributions to decarbonising our economy and making the transition to net zero.

Renewable technologies – be that wind turbines, solar panels or even electric cars - all depend upon copper, silver and other metals. Due to its high value, gold is still used primarily to support currencies and economies and as an investment or in jewellery but it also has growing uses in electronics and medicine. Demand for these metals has never been higher and continues to grow. We can't keep relying on other countries, where environmental and safety regulations typically aren't as strong, to supply our needs. Governments also want to be sure that as demand grows, they will have a stable source of vital raw materials to support the economy and achieve net zero targets.

That's why both the UK and EU have introduced Critical Mineral strategies to source more minerals closer to home. Copper was recently added to the US critical minerals list and the EU's strategic minerals list and we expect that as the UK's Critical Minerals Intelligence Centre continue their work to update the UK's list, copper will be one of the leading candidates for addition.

We are continuing with exploration work on our licence areas, with a focus more recently on critical minerals - those considered essential to industry, the clean energy transition,

national security and defence. Governments around the world have developed critical minerals lists that reflect their objectives, existing trading networks and growth forecasts. The UK's list was first published in 2022 and will undergo regular review. We expect, over time, that it will expand beyond the initial 18, with copper, gold and silver all being candidates for inclusion, given their recognition by other jurisdictions such as the US and EU for copper, and gold by China, with silver being considered for addition by many countries because of its importance in the energy transition.

A great deal of work has been done since 2009 to understand the mineral endowment at Curraghinalt, including extensive drilling, sampling, and geological studies. While we have always tested for a broad suite of elements, the focus in understanding the deposit, until recently, has been on the main minerals: gold, silver and copper. However, as highlighted in studies by the British Geological Survey and NI's Dept. for the Economy, one of the best places to source UK critical minerals is mid-Tyrone and, within that, our Curraghinalt deposit is the most promising. This is based on existing data, with more work underway to understand the presence of these minerals and how they might best be extracted.



This is one of the largest-ever US investment in Northern Ireland, with over \$400 million invested so far and plans to invest another \$1.3 billion. The proposed underground mine will:

- Bring widespread benefits to an area that is on the economic periphery and which, as a result, loses many of its young people to bigger centres and emigration;
- · Create and support 1,000 jobs: we have already received over 3,800 expressions of interest from people who are interested in well-paid careers with Dalradian;
- Businesses in Tyrone and beyond will feed into the £750 million local supply chain. In the pre-commercial stage of the project, we've already bought goods and services from over 500 businesses in NI:
- Reduce NI's total trade deficit by 2%: and

 Contribute to the sustainable development and vitality of local communities through the £4 million Dalradian community fund, spreading the benefits more broadly to support educational, health, arts, sporting and environmental projects.

All of this will be accomplished while safeguarding the environment. We've worked with global mining experts to create a world class project that uses best practices to protect the environment and increase biodiversity. Our planning application covers in detail, topic by topic all aspects of the project. All of this has been extensively reviewed by statutory consultees over the nearly six years the application has been moving through the planning process, with multiple points for public feedback.

Our application is supported by our track record since 2009 of strong health & safety and environmental performance, local hiring, training and purchasing and initiatives such as Carbon Neutral Plus and Investors in People. Our team is always looking for ways to go further, for example, moving from the standard IIP accreditation to gold standard level in 2022. In addition, while efforts continue to reduce our carbon emissions from our current operations, our team are now focussing on understanding emissions at the future mine and how they can be reduced. We're taking this message to our existing and prospective suppliers, with the approach that our entire supply chain needs to be minimizing emissions and improving sustainability.

We appreciate the patience of our investors, staff, suppliers, community and prospective staff/suppliers as we continue to move through a planning process that is taking much longer than expected. It is cold comfort that we are not alone. It is widely acknowledged by trade bodies and other government agencies, such as the Public Accounts Committee, that NI planning is underperforming and needs reform to deliver the timely process set out by regulations.

We have designed a modern mine that will deliver long-term benefits for the region while meeting strict environmental standards – we expect the final planning decision will reflect that. In the meantime, we welcome the public local inquiry and the further opportunity it provides for an independent, evidence-based examination of our project.

Completion of the inquiry and planning approval will unlock a further \$250 million investment for construction of the project, signing of supplier contracts, staff recruitment and a 3-year, £15 million training programme to support local employment.

Patrick F.N. Anderson

Chief Executive Officer 15 October 2023

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# \$400m

total US investment to date

## 

environmental and health & safety non-compliance in 2022



suppliers in Northern Ireland have contributed to the project to date

## £1.2m

in funding provided to more than 650 community groups (2011 - 2022)



4th year in a row certified **Carbon Neutral Plus** 

## MD Foreword

We continue to advance our planning application to build a modern underground copper-gold-silver mine in Tyrone through the Northern Ireland planning system while simultaneously progressing our environmental, social and governance initiatives.

Throughout 2022, our focus remained on progressing the application through the final stages of permitting. Almost 6 years on from submitting the application to the Department for Infrastructure, we are awaiting a timetable for the public inquiry. Undoubtedly the Northern Ireland planning system is challenging but we look forward to a schedule being announced during 2023 by the Planning Appeals Commission, given the PAC website states, "it is anticipated that the public inquiry will commence later in the 2023/24financial year." The public inquiry will provide another opportunity for further examination of the project by experts and other stakeholders.

Once planning has been obtained, we can begin construction of the mine generating a supply chain and labour spend of \$250 million during this phase, providing opportunities for the local community. We foresee that this will take 18-24 months before operation and production can

get underway. Throughout the life of mine, some 15,000 tonnes of copper, 3.5 million ounces of gold and 850,000 ounces of silver will be produced, minerals which are essential for a range of industries, including renewable technologies. The project will be transformative for West Tyrone and beyond, creating around 350 jobs directly with the company and approximately an additional 650 within the supply chain.

Our environmental work was maintained throughout 2022 meeting regulatory requirements and our exploration team continued exploring for a range of base metals, critical minerals, rare earth elements and precious metals. In addition to gold, silver and copper, ongoing research has indicated our deposit contains several critical minerals essential for green growth including tellurium, antimony, bismuth, molybdenum and cobalt. Securing local supply of minerals and reducing the UK's reliance on imports is crucial for supporting industries, jobs, and the transition to a green

economy. I'm pleased that government has recognised the importance with the launch of the UK's Critical Mineral Strategy last year and the addition of copper to EU and US critical minerals lists.

For the fourth year running, we were certified as Carbon Neutral Plus by Carbon Footprint, decreasing our emissions by 75% measured against our baseline year (2019) and by 26% compared against 2021. To offset our remaining emissions, we supported an internationally certified 300MW solar power project in India. Solar Panels typically use metals such as silver, copper and tellurium. In addition to supporting overseas projects, we look to contribute more locally by supporting tree planting projects. To date, we have sponsored the planting of over 1.500 trees in Northern Ireland. Our aim is to build a state-of-the art environmentally responsible underground mine and our emissions will adapt as we move through the different stages from permitting to construction, operations, and closure.

I am very proud of our many achievements to date. This is our fourth Responsible Business Report and embodies the cultural vision we are creating where Sustainability is on par with Health & Safety and the environment within our business. Our team is already looking ahead at the life of mine emissions and identifying areas where we can proactively reduce our carbon emissions. We are in discussions with potential suppliers of cement, steel, and explosives to ensure their values align with ours so that sustainable practices are carried out throughout the entire supply chain. Additionally, we are planning a progressive restoration programme starting during construction, which will accumulate in planting over 30,000 native trees such as oak, hazel and rowan. We envision engineering and environmental centers of excellence, driving industry research, innovation and ultimately improving how we all work. Furthermore, a Training Academy will be set up to support local hiring.

We have immense plans to develop a world class environmentally responsible mine that has been a cumulation of over 13 years work and investment. We look forward to a positive conclusion to the planning process and working with all of our stakeholders in realising this once-in-ageneration opportunity for Tyrone.

#### **Brian Kelly**

Managing Director 15 October 2023







minimum committed to future community projects

## 300

future jobs in construction

1,000

jobs to be created in operations, with a £15m training budget to maximize local employment

# £750m

planned expenditure on supply chain



Maintained 3-year IIP certification. Reaccredited to IIP Gold level in June 2022

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# Copper

Visualising future copper production of the mine. What does 15,000 tonnes of copper look like?

This is the forecasted production of Dalradian's future mine over 20-25 years (or annually: 667 tonnes of copper). Below are conversions of the mine's copper production into items we use every day, some of which are vital to the transition to net zero.

#### 0 **EVs** Wind Uses Homes Turbine Copper wiring /Heating Demand Average **4.7 tons** 53.2kg home has approx of copper used (4.26 mtonnes) of Copper 200kg in the average EV required for a single 3MW turbine (150m high; - 768,810 homes in NI introduced in 2010) Enough copper Enough Enough Potential Supply from copper for to build copper for our Deposit 281,955 9.8% 3,521 of NI homes wind turbines EVs

Mine production

# 15,000 tonnes



# 15g -6.92 billion smart phones worldwide

Enough copper to make billion of the world's smart phones

A million mobile phones would contain 16 tonnes of copper, 340kg of silver, 34kg of gold. Gold

Visualising future gold production of the mine. What does 3.5 million ounces of gold look like? This is the forecasted production of Dalradian's future mine over 20-25 years (or annually: 156,000 oz of gold). Below are conversions of the mine's gold production into items we use every day.

Mine production





16





per average mobile phone

Enough gold to make



of the world's smart phones

16 tonnes of copper, 340kg of silver, 34kg of gold.

# Silver

Visualising future silver production of the mine. What does 850,000 ounces of silver look like? This is the forecasted production of Dalradian's future mine over 20-25 years (or annually: 37,778 oz of silver). Below are conversions of the mine's silver production into Mine production



Uses

Demand

**Potential Supply from** our Deposit

# 850,000 ounces





#### per average mobile

Enough silver to make

1% of the worlds smart phones

A million mobile phones would contain 16 tonnes of copper, 340kg of silver, 34kg of gold.

The 350 direct jobs created at the future mine will provide a broad range of careers.

3 GOOD HEALTH AND WELL-BEING 4 QUALITY EDUCATION -/w/•

5 GENDER EQUALITY Į 8 DECENT WORK AND ECONOMIC GROWTH M

1000



# SUSTAINABLE CITIES

People

As a company that plans to provide hundreds of jobs locally for decades to come, Dalradian wants to ensure that our local community benefits fully from our proposed underground copper-gold-silver mine. Benefits can come in many forms - career opportunities for young people, well-paid jobs, new business for local firms or support for community projects. This is the legacy of modern mining.

Sense of community is strong in Tyrone, with support for neighbours provided without question. We established the Dalradian Community Fund in 2015 to formalise our support for the local community.

To date we have supported over 650 community groups with over £1.2 million in funding. Arts groups, environmental groups, healthcare providers, schools, sports teams and social clubs are among the local associations that benefited from the funding.

Post planning approval, we have committed to further funding - a minimum of £4 million for community projects over the life of mine.

Modern mining projects bring prosperity to the areas in which they operate, and we want to spread the benefits of our project as widely as possible.

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# People Highlights

£1.2m

in funding provided to more than 650 community groups, including those needing Covid-19 support (2011-2022)



college students supported to date through bursaries at South West College





staff employed at the end of 2022 (total of 200+ to date)



16,000+ total 2015-2022

health & safety non-compliance in 2022



people to date have taken Tunnel Tours\*



people have enquired about jobs at the mine



# 750+

landowners have given us permission to sample or access their property for exploration or environmental monitoring





#### Modern Mining and Sustainable Communities

Although modern mining may seem like a new industry for Co. Tyrone, the county has a distinguished background in quarrying and small-scale mining. Indeed, many of the county's major employers, including Terex, Sandvik and CDE Global provide machinery and equipment for mining and quarrying around the world.

Modern mines can be found throughout Europe – including close to home in both Ireland and Britain. Modern mining invariably takes place underground, using the most up-to-date technology that allows virtually every aspect of operations to be digitised, controlled, or monitored remotely.

Technology has also made modern mining a more environmentally responsible sector. 3D models, for instance, can now accurately locate the best seams and help minimise waste. As with most industries, mining is also much more regulated than in the past and there are strict standards required for both Health & Safety and the environment.

As well as being environmentally responsible, 21st Century mining also brings opportunities to build sustainable communities. Through local partnerships, mining can invest in the physical fabric of our villages and towns enhancing the sporting, cultural and educational bonds that bring a community together and providing jobs for young people who may otherwise move away.

Tara Mine is an example of a mine that has co-existed well alongside the community for decades. The mine lies on the edge of Navan, the county town of Meath, where it operated safely and successfully since opening in 1977. The mine announced a temporary shutdown in June 2023 due to low zinc costs coupled with hiah energy costs and across the political and community spectrum, calls have been made for a reopening.

SIPTU TEAC Division Organiser, Adrian Kane,

commenting on the need for government intervention in the temporary closure of Tara Mine: "The strategic role that Tara Mines plays in the wider national economy and the importance of zinc as a critical mineral in transitioning to a carbon neutral economy must be considered by the Government."



Tara Mine has co-existed with the community in the Boyne Valley for over 40 years demonstrating that mining can provide direct economic benefits while operating well alongside residents and activities such as tourism, angling and farming, which rely upon a pristine environment.

Just a little further south in Tipperary, Lisheen Mine demonstrates that the positive legacy of mining can last after operations finish. Lisheen is located just 3.5 hours' drive away from Omagh in a rural part of Co. Tipperary renowned for its horse racing and dairy farming, including the award winning Cooleeney cheese. The zinc and lead mine, near the villages of Moyne and Templetuohy, closed in 2015 after 17 years of operation. During that time, the mine provided jobs for 400 people.

With the mine now closed and rehabilitation of the site completed, part of the former mine site has been returned to its pre-mining use as grazing for cattle and sheep. Environmental monitoring at the Lisheen site is ongoing to ensure continued compliance with statutory regulations. However, the mine's owners and local community have also worked closely together to find other innovative uses for former mining-related infrastructure on the site which the community wanted to keep. These include the National Bio-economy Research Centre which is housed in a former mine building and provides new employment.

since 2011

Dalradian Project

Groups funded

by Dalradian

The local area also continues to benefit from enhanced community, sporting and educational facilities thanks to funding received from the mine when it was operational. This includes the refurbishment of the

"Ireland has a 50-year history of zinc and lead mineral exploration and production. We need to encourage and support industry in their efforts to find the next Navan and extending the life of this important sector for our economy."

Irish Minister for Skills, Research, and Innovation



community hall in Moyne and the construction of a new hall at Templetuohy, both supported by the mine during its operation.

Sports in the area also benefitted with the mine helping to fund a new outdoor all-weather floodlit athletics track, helping the club attract athletes from across the country to their facility. By working closely with the mine operator, the local community in Tipperary has maximised the benefits of mining for the local area.

Both Tara and Lisheen Mines provide excellent examples on the island of Ireland where modern mines and the communities around them have co-existed and grown as a result. Tourism, agriculture, the environment, and the wider community have been able to live in harmony with the mine, while the economic opportunity has allowed other businesses and services to grow.



#### We struck Gold by **Investing in People**

We first obtained the standard Investors in People (IIP) award in 2019. Three years on, we are delighted to have advanced to the gold standard accreditation, scoring the 2nd highest in our industry sector, recognising the continuous commitment to our people.

Investors in People have been operating since 1991 and are recognised in 66 countries worldwide, making it the global benchmark for people management. They accredit those who invest in their people and assist them to continue to improve at inspiring, supporting, managing, and training employees. The goal is to create better more productive organisations.

IIP assesses a specific framework to understand and measure how well we are leading and supporting our people compared to other companies in our industry or of our size. The assessment includes a companywide survey and interviews with individual team members to get their views. A report is then produced with recommendations to help us improve.

We are committed to providing an environment where our team can reach their full potential. evident by some of the survey responses. Over 93% of people responded positively to the statement "My organisation is a great place to work", with over 96% of respondents agreeing with the statement "I



have opportunities to learn at work" and over 93% responding positively to the statement, "I am able to develop the skills I need to progress".

We have developed a culture where our team are valued and supported. Between now and our next assessment in 2025 we will implement IIP's recommendations for further improvement.

"This is a fantastic achievement for our team! We have maintained our focus on Dalradian's core values, ensuring that our people understand and are aligned with our vision and are supported by a range of health and wellbeing initiatives. Gold accreditation confirms that Dalradian has got the policies in place which reflect our commitment to our employees and that those policies are successfully guiding our daily work."



### Congratulations Paddy

#### Supporting our employees with continuous professional development is important to us.

Our team are encouraged to learn new skills and expand on their existing experience. Last year, one of our geo-technicians, Paddy, graduated from the University of Ulster with a Diploma in Environmental Toxicology and Pollution Monitoring.

Paddy has been working at Dalradian for the last seven years and has a keen interest in the environment. He has been using his expanded knowledge to research and carry out sustainability projects for Dalradian.

This is a sign of things to come. Post planning approval we will be launching a £15 million training programme over the first 2 years of construction and the 1st year of mine operation to support our goal of reaching 90% local employment at the proposed mine.

Angela Coney, HR Manager

### Return to the Office

#### 2022 saw the beginning of a phased return to office working following two years of working remotely due to Covid-19.

In July, we implemented flexible working where our staff work part of their week in the office and part of the week from home. We held a brunch to welcome our team back.



### Mine Rescue Team

Our Mine Rescue team provides immediate response in the event of an emergency situation. We currently have 12 crew members who have all achieved the Mineral Products Qualification Certificate Level 3 Award in First Aid at Work as well as undergoing a course of instruction, practice, and competence in rescue work. Being on Mine Rescue is a substantial time commitment for everyone on the team, including some travel and being on-call. We appreciate their service to our project as well as representing Dalradian in supporting other mines in the region.

Training is an ongoing process to develop skills and maintain competence levels. MRS Training and Rescue Ltd assist with the training and supply our team with their underground breathing

apparatus (Drager BG4 sets). The team are tested on the inspection and wearing of their breathing apparatus, use of the mine plan, traversing the mine safely and the loading and safe transport of a casualty. We also complete four in-house training sessions per year where search and rescue situations are simulated.

Our team is also part of the Irish Mine Rescue Committee (IMRC) alongside teams from other mines throughout the island of Ireland including Irish Gypsum, Irish Salt, Tara and Galantas. IMRC run mutual training events several times a year where all the mine rescue teams come together and stage emergency situations to hone and share skills with each of the teams. As members of IMRC we would support other mines in the event of an emergency.



Regul Mine



#### We use a range of communications tools to help our local community understand our project. These include:

	<b>Newsletters</b> (electronic and print)
10 10 10 10 10 10 10 10 10 10 10 10 10 1	<b>Social Media</b> (Facebook, X, Instagram, YouTube and LinkedIn)
	Blogs
	Presentations
	Website

















# **Environment**

We aim to build and operate one of the world's best modern mines right here in Tyrone. We will use best practices and the latest technology to achieve a highly productive mine while minimising the impact on the environment.

#### We're not waiting until sometime in the future to implement careful environmental management.

There are many examples from recent years. During exploration, we use bog mats on drill rig sites, which leave the sites almost indistinguishable from the surrounding fields. At the end of our test mining, we restored our waste rock store so well that it blends in with the surrounding fields and has withstood some serious flooding events. As part of our Carbon Neutral Plus programme, we have supported planting of a total of more than 1,500 native species trees in Northern Ireland over the past four years.

Examining the rich tapestry of local plant life now growing or the rehabilitated waste rock store from our test mining phase

13 CLIMATE ACTION









Our mine design is at the forefront of modern mines, with a commitment to carbon neutrality, a water treatment plant that can treat to drinking water quality, and utilisation of Best Available Technologies with respect to waste management. Most waste rock and tailings generated will be stored underground, with the remainder being placed on the surface in a dry stack facility. The potential ecological impacts of the mine have been rigorously assessed using best practice guidelines and mitigation measures have been adopted to eliminate or reduce any potential impacts upon ecological receptors to negligible levels. Dalradian has committed to ensuring that the proposed mine delivers Biodiversity Net Gain.

# **Environment** Highlights

or reused in 2022 environmental noncompliance in 2022 **30km** river network subject to environmental testing as part of our baseline work

external agency environmental inspections in 2022

100% of solid waste recycled



environmental monitoring points (water, air quality, radon)



dedicated environmental staff



from renewable sources

# tonnes of carbon emissions were offset

in 2022 through a high-quality international offsetting project, resulting in carbon-neutral certification. In addition, Dalradian supported the planting of 200 trees in Northern Ireland to achieve Carbon Neutral Plus status.





meetings with regulators and statutory consultees on planning application to date





internal environmental inspections in 2022



## **Climate Change**

Dalradian Responsible Business Report 2022

Dalradian has been active in management of climate change from the standpoint of minimising the impacts of our existing and future operations on climate as well as managing the risks that climate change could bring, both in our existing operations as well as the proposed mine.

Over the past four years, through proactive carbon management, we have reduced overall carbon emissions by 75%.

In our existing operations, the primary focus for climate change management is the exploration site. Within that site, the waste rock store and the water treatment plant were engineered and are maintained with climate change in mind. For example, the water treatment plant is designed to handle a 1 in 100 year flood event. As a result, the site coped with the local flooding events of 2017 that caused substantial damage to roads, bridges, homes and businesses in the North West.

The future mine has been designed using the best available technology to manage climaterelated risks, including:

A LOT A T

- Mining is underground.
- The tailings method is dry stack, which is acknowledged by the EU as a Best Available Technique. It is a more secure method than tailings dams and can be progressively rehabilitated during operations.
- Ponds are designed to withstand a 1 in 1,000 year storm event and are developed through 100% excavation into existing ground.
- We introduced a belt system as the primary method of transporting ore and waste rock to surface, reducing diesel consumption, and added underground oresorting equipment to improve efficiency. Smaller underground vehicles will be electric powered. For the larger machines, we are looking at developing technology and will incorporate it as it becomes proven.



Where relevant, our

Environmental Statement for the mine's planning application has considered climate change, for example, in the surface water and management throughout our groundwater impact assessments and modelling, which were independently reviewed by a mine waste consultant appointed by the Department

for Infrastructure. Development of the site also makes flooding in the catchment less likely, due to on-site storage capacity, while at the same time protecting current low flow minimums by controlling discharge. Water for operations will be sourced on-site, recycled extensively to minimise water use and treated prior to release.

Dalradian has achieved Carbon Neutral Plus status for 2019, 2020, 2021 and 2022. We are committed to continue this programme during construction, operations and closure. That will include



Dalradian has achieved Carbon Neutral Plus status for 2019, 2020, 2021 and 2022.

proactively minimising emissions each year and engaging with our suppliers to encourage proactive climate and emissions supply chain.

In Northern Ireland, peat is an important store of carbon and assists in managing water flow during heavy rainfalls, as well as maintaining good water quality. Northern Ireland has 24.6% peat coverage and 86% of peatlands are in a degraded state due to drainage, overgrazing, afforestation, burning and extraction. (Source: NI Assembly Research Briefing Paper NIAR 117-2021). Peat that is degraded releases its carbon into the atmosphere, accelerating climate change. Thus, peat rehabilitation is a key action to lower emissions and fight climate change. Peat loss will be minimised in construction of the project and



unavoidable peat loss will be offset by peat restoration in the local area. Details on peat management are contained in the 2017 Ecological Mitigation and Management Plan submitted with the planning application.

Climate change is increasingly being addressed by the management team in budgeting, risk assessments and forward planning. Even though we are pre-operational and have a small staff, we have one staff member dedicated to sustainability and a team of staff that meets monthly to move forward sustainability projects. We are continuing to research opportunities for use of renewable energy sources and keeping informed about new technologies to upgrade our fleet.

### **Beyond Carbon Neutral**

#### 2022 was the fourth year of being certified as Carbon Neutral Plus, which entails:

- (i) developing and carrying out a carbon management plan to proactively reduce carbon emissions as much as possible;
- (ii) offsetting the emissions through an internationally certified offsetting project to achieve neutrality; and
- (iii) supporting tree planting in Northern Ireland to achieve the "Plus" designation. To date, over 1,500 trees have been planted through our support.

We endeavor to find additional ways of reducing our carbon footprint at every turn, through all activity. Since our benchmark year of 2019, we have decreased carbon emissions by 75%.

Through Dalradian's carbon management plan, we reduced carbon output by 26% between 2021 and 2022. This was largely a result of continued reductions in diesel usage through advanced planning and collaboration between different work teams to coordinate project timing. In particular, Dalradian improved the operational efficiency of its water treatment plant and reduced the need to use a generator.

Since our benchmark year of 2019, we have decreased carbon emissions by 75%.





United Nations Sustainable Development Goals

### **Carbon Offsetting** Project

To offset our emissions from 2022, we have chosen to support an internationally certified 300MW solar power project in Rajasthan, India.

The project eliminates greenhouse gas emissions by displacing power from thermal/ fossil fuel-based power plants connected to the Indian electricity grid with clean solar power. Two of the United Nations Sustainable Development Goals (a blueprint for peace and prosperity for people and the planet) are supported by this project – 'Affordable & Clean Energy' and 'Climate Action'.



Silver and copper, which are included in Dalradian's polymetallic deposit, are typically used in the production of solar panels.

Prior to 2022, we supported a range of internationally certified projects to purify water in Cambodia, provide more efficient cookstoves in Malawi, and reduce methane emissions in Bulgaria.



### **Increasing Biodiversity** around the Mine

#### Dalradian's proposed

underground mine is in an area characterised by agricultural land, elements of woodland and areas of peat. As part of our planning application, we have conducted extensive ecological impact assessments which provides detailed information about local animal populations and their habitats. Our proposed mine site has been designed to increase biodiversity.

As a guiding principle, the area containing the project's infrastructure has been made as small as possible to minimise habitat loss and infrastructure has been sited to avoid disturbance of habitats as much as possible.

We have also proposed an Ecological Mitigation and Management Plan (subject to approval by the Department for Infrastructure) which sets out a series of measures to help ensure that overall, the project produces a net gain for biodiversity.

As part of our ecological assessments, experts have produced a detailed analysis of local wildlife. These assessments have found that, in addition to breeding birds, the area supports other animals such as common lizards, bats, badgers, smooth newts and common frogs.

As well as appointing a dedicated Ecological Clerk of Works to help oversee the development of the mine and its operation, Dalradian is also proposing a number of measures to protect local animals and habitats. One such tried and tested approach by ecologists is to compensate for the loss of any habitats by enhancing and improving similar habitat areas nearby.

#### Measures proposed include:

- Creating new peatland habitat areas
- Providing new roosting sites for bats
- Providing new nesting sites for birds
- Constructing a new replacement badger sett
- Relocating common lizards, common frogs and smooth newts
- Creating new breeding ponds

The combination of these activities will enhance rather than reduce the level of biodiversity across the wider area.

The proposed measures contained within the Ecological Mitigation and Management Plan are multifaceted and extensive, with specific actions identified for specific animals. Some of these are detailed below:

> • Bats: There are known to be at least six species of bat living within the area. To support them we will build a new stone bat house to replace an existing roost and improve foraging / commuting corridors by planting almost 2 km of new hedgerow specifically for this purpose. Construction work near the existing roost will only take place when necessary and, as required, under the guidance of a European Protected Species licence issued by the Northern Ireland Environment Agency (NIEA).

possible.

The combination of these activities will enhance rather than reduce the level of biodiversity across the wider area.



• Badgers: Surveys conducted at the proposed site found three active badger setts. These, and other setts in the area, will be monitored annually for two years after construction work has finished. A NIEA licence is also required for any construction activity within 30m of an active badger sett entrance, although such work will be avoided wherever

· Newts, Lizards and Frogs: Prior to construction these will be captured and relocated, under appropriate NIEA licences using agreed techniques (including the use of temporary or semipermanent reptile-proof fencing to exclude them from construction areas). We will also create two new freshwater breeding ponds and construct at least three hibernacula (underground shelters that provide a safe space for amphibians and reptiles).

While advance of the project is not predicted to have any significant effect on Freshwater Pearl Mussels known to be present in the catchment, a commitment has been provided in our application to protect and enhance this endangered species by investing in their conservation and by working in partnership with local organisations. An assessment of potential opportunities in this respect has already been prepared.

By preserving, enhancing and creating new habitats, mining operations can co-exist alongside native wildlife and even support enhanced biodiversity.



#### **Q&A: Planning for Sustainability**

#### Q: Oonaah, what is your role with Dalradian?

A: I've been leading our sustainability programme now for several years. The main project every year is measuring, reporting on, and obtaining certification for carbon neutrality for the year just past, while also looking for ways to reduce our carbon emissions for the current and future years. I also lead a cross-disciplinary team that identifies and implements sustainability projects, such as our native tree nursery. Then I am constantly researching the latest trends in sustainability and sharing this information through staff presentations and newsletters to bring sustainability to the forefront of all that we do. We are aiming to produce a major shift in our culture - like the one that has already taken place in Northern Ireland with respect to health & safety. We want on how they are sourced or everyone in the company thinking about all aspects of sustainability every day and for it to be a consideration in all our planning and decisions.

#### Q: What are you working on to reduce the carbon footprint of the proposed mine?

A: It's important to realize that each stage of our project - exploration, permitting, construction, operations and rehabilitation/closure - has a different level and mix of emissions. Much like we do with our existing operations at the permitting stage, for the future mine our initial focus is on the aspects that will make the biggest difference in reducing our carbon emissions. The first step was quantifying where the emissions are going to come from at the future mine. The projections clearly identified mining consumables as the biggest category. This includes supplies for the mine such as concrete, steel and explosives. These materials that we will purchase come with an existing carbon footprint, depending manufactured. So, the next step is talking to our potential suppliers for these materials and getting more information about their product range and associated emissions. At this stage, we are also letting them know that sustainability is an important piece of the competitive process to secure a supply contract with Dalradian. Then we can collaborate with like-minded suppliers to achieve emissions reductions throughout the mine's supply chain.

**Projected Carbon Emissions Over Life of Mine** 

- Shipping Product Process Waste Treatment
- Transport
- Process Consumables
- Mining Consumables
- Surface Infrastructure
- Grid Electricity
- Diesel Fuel
- Diesel Fuel WTT



**A:** The quest for further reductions to our carbon footprint is an ongoing process. One of the advantages of building a mine now is being able to incorporate all the latest technology. So, we will continue to look at our options for alternative fuels and keep up with innovations in electric-powered underground mining equipment. Electrification started with the smallest machines and, over time, larger equipment is also being electrified as batteries become more powerful. Because our project is in Tyrone, we are close to some of the global leaders in engineering and manufacturing of mining equipment. There are also excellent to opportunities as they arise. envirotech firms locally so we will have some great partners to work with on our sustainability journey.





#### **Q:** What's next after that?

#### Q: What are some of the challenges you face in carbon reduction planning for the future mine?

A: As you can well imagine, there are differing levels of commitment and preparedness among businesses in our region. Some companies are more advanced than us in their planning and others are not as advanced, but we all need to work together to lower carbon emissions. There is also a level of uncertainty regarding fuel sources and availability including the impact of emerging fuel types such as hydrogen and biodiesel. Our plans will continue to evolve, and we need to maintain a degree of flexibility to be able to respond



# **Our Business**

## Need for Minerals

Many of the actions needed to achieve global net zero targets by the middle of this century, whether it is reducing the use of fossil fuels, building more renewable energy infrastructure or switching to electric vehicles, will place a huge demand on mineral raw materials.

Achieving climate change targets just won't be possible without the global mining sector and the essential minerals it provides.

O



## Five-fold increase in metals needed

It's widely accepted that if the world is to successfully transition to renewable energy and deliver a new Green Industrial Revolution then the supply of metals will have to increase.

A recent study by the World Bank titled "Minerals for Climate Action" found that demand for silver is expected to increase by more than 300% and copper by 200% by 2050. Some have suggested that to achieve the Paris Agreement target of just a 1.5°C or lower increase in global temperatures, there will need to be a five-fold increase in the supply of many common metals. Demand for some metals which are integral to renewable technologies is expected to surge.

A key question for government, businesses and consumers is: Where will these metals come from?

In the last 5000 years, about 550m/t of copper has been produced. The world will need around the **same amount of copper in the next 25 years** to meet global demand.

# Underpinning a greener future

The Institute of Geologists of Ireland (IGI) couldn't be clearer about why we need to think strategically about where we source our minerals: "Currently, Europe has to import more than 75% of almost all metals, and up to 100% of some critical minerals. With that comes certain supply risks, such as higher prices that could have an adverse impact on the economy in the event of a serious trade dispute or disruption."

This statement has already been proven. We just have to look at the long waiting lists for electric cars and the hike in prices. Relying on imports puts us in a vulnerable position. We've been putting our heads in the sand; more should have been done about this issue before now. How can we be content for mining to take place in faraway countries, which often have poor environmental standards and working conditions? Not to mention the carbon footprint of importing these raw materials.

The IGI conclude that "More mining in Europe would ensure it takes place under environmentally and socially sound conditions while making the economy more resilient."

This pragmatic approach is shared by Eamon Ryan, Minister for the Environment, Climate and Communications, Leader of the Green Party, Republic of Ireland, who said. "My department is currently finalizing a draft policy statement on mineral exploration and mining...[highlighting] the role of minerals in our everyday lives and the critical role they will play in our transition to net-zero emissions and carbon neutrality by 2050. The draft policy recognises that we need to repair, reuse and recycle more minerals and metals but this alone will not supply the quantity of minerals required to decarbonize our energy system through solar power renewable wind energy and batteries. Relying solely on imported minerals risks these activities being developed in parts of the world where less stringent environmental and human rights standards apply while also risking our ability to secure the minerals needed to make the green and digital transition a reality."





#### How will the UK Critical **Minerals Strategy help?**

After recent global events, it's now more crucial than ever that UK supply chains are made more resilient to help support our industries, jobs and deliver on the transition to the green economy. To help address these issues, the UK government launched its first ever Critical Minerals Strategy in 2022. The strategy aims to ensure that minerals needed for the future are available in the quantities needed, extracted responsibly, and supported by well-functioning and transparent markets.

The strategy aims to achieve these goals through a new A-C-E approach.

- Accelerate growth of the UK's domestic capabilities
- Collaborate with international partners
- Enhance international markets to make them more responsive, transparent and responsible.

The UK government announced its initial list of 18 critical minerals (CM) in 2022 and is working to update the list in 2023/4, looking at a broader range of minerals. Recent revisions of critical minerals lists from other iurisdictions have seen the addition of copper to the US and Japan lists as well as the EU's Strategic Minerals List, while China includes gold on its list.

**UK Critical** Minerals Strategy, Full Report.



Which minerals are critical?

#### Other countries

- Australia
- Canada
- China
- Japan
- USA

#### • Present in Dalradian's deposit

\*Silver is a candidate mineral in the UK, EU, and US. Due to its importance in the green energy transition, it is expected to meet criticality thresholds in the future or be included as a strategic mineral on some lists.



#### How can Dalradian contribute?

Since 2009, Dalradian has explored for a broad range of minerals in Northern Ireland under licences issued by the Department of Economy including precious metals, base metals, critical minerals and rare earths. Based on that work - plus test mining, engineering and environmental studies - the company has developed an environmentally responsible, carbon neutral project to mine underground for copper, silver and gold (metals which lend themselves to an array of highly useful purposes, including renewable technologies).

Recent research by the UK and Northern Ireland governments has highlighted the potential of Northern Ireland to be one of the best sources of critical minerals in the UK. Our deposit contains Tellurium, Antimony, Bismuth, Molybdenum and Cobalt. Dalradian's licence areas potentially broaden the list to include Gallium, Germanium and Indium.

Advancing Dalradian's polymetallic project to boost to the sector.

#### Potentially prospective areas for critical raw materials



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production will give a huge

100.0

#### **Our Business**

Dalradian has been working in West Tyrone since 2010 and holds to operation will build a new exploration licences from the Department for Economy. Our team explores for a range of base and precious metals as well as rare earth elements and other critical minerals.

The company is supported by one of the largest-ever US investments in Northern Ireland to advance its project that will produce substantial quantities of gold, silver and copper, and also contains critical minerals such as Tellurium, Bismuth and Antimony. We have invested more than £142m to define the deposit, and develop environmental, engineering and economic feasibility studies. At this pre-operational stage, we have a core team of about 30 people at our Omagh and Gortin offices in Co. Tyrone. In 2017, the company submitted a planning application to develop a long-term, underground mine at Curraghinalt - the planning process is ongoing with the public grazing upon closure. Dalradian local inquiry expected to be scheduled soon.

for miners.

neutral mine in Europe.





8 DECENT WORK AND ECONOMIC GROWTH

M



SUSTAINABLE CITIES

13 CLIMATE ACTION

5

a free



Advancing the proposed mine industry for Northern Ireland, create 1,000 jobs and support a local supply chain of £750 million. This project will be economically transformative for this rural area and, based on the experience from other mines in developed countries, Dalradian is aiming for a 90% local employment rate during operations, following completion of the initial 3-year, £15 million training programme. Tyrone is already recognised as one of the world's leading regions for production of mineral extraction equipment and also has strong construction and farming sectors, both of which provide many of the skills needed

Dalradian has designed a project in keeping with the character of the local landscape and in line with strict regulatory standards. Rehabilitation will commence during operations and the site will be returned for use as farmland / has achieved the status of Carbon Neutral Plus for 2022, the fourth year in a row. In 2019, the company committed to building and operating the first carbon

### Locations of the more than 500 businesses in Dalradian's supply chain

Shown on this map are the 500+ businesses that Dalradian has already worked with across Northern Ireland during our exploration and planning phases. The range of opportunities and number of suppliers will expand during construction and operation.

- Dalradian Project Site
- Dalradian Supply Chain Businesses



### **Progress at Curraghinalt**

- More than 190,000 metres of drilling - steady growth in size of the deposit
- 6 resource updates resulting in a 10x increase in resources
- 2,000 metres of underground development with three areas of test mining
- Economics proven through multiple economic feasibility studies
- Permitting application advancing through planning process
- Metres of Drilling (Left side)
- Amount of gold identified (millions of ounces - Right side)

Key topics covered by the Environmental Impact Assessment in the planning application

Landscape and visual Surface water Groundwater Soil and geology Ecology Air quality Noise and vibration Traffic and transport Radon

Archaeology and cultural heritage Economic & social/community Health (human and animal)

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#### CONSENTS REQUIRED FOR OPERATIONS as of 31 Dec 2022

	Submitted	Received
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osives Storage Consent	<ul> <li>✓</li> </ul>	~
ning Permission	<ul> <li>✓</li> </ul>	
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d Abandonment	<ul> <li>✓</li> </ul>	
raction Licences (2)	<ul> <li>✓</li> </ul>	
er Discharge Consents (2)	<ul> <li>✓</li> </ul>	
osives Storage Consent	<ul> <li>✓</li> </ul>	
dule 6 (Culverting)	<ul> <li>✓</li> </ul>	

Existing Permitted Site Planning Application Site

51



### State of the art mine features

Precious metals are indispensable for modern life and demand for them has grown with their application in emerging renewable energy technologies to tackle climate change. To extract these metals responsibly we have designed a best practice modern mine.



State-of-the-art water recycling and reatment facility

#### Majority of mined materials retained or returned underground

Full site reclamation secured in advance with a financial guarantee provided by Dalradian

#### **Future Site**

### **Planning Update:** public inquiry is last major step in extensive process

In 2021, our planning application to build an underground goldsilver-copper mine in Tyrone was referred to the Planning Appeals Commission (PAC) for a public local inquiry by the Minister for Infrastructure. This **major step forward was preceded** supported this important step in by extensive consultation with stakeholders on the main application and two rounds of further environmental information.

The public inquiry is expected to take place soon and will bring together planning and environmental experts, community and business groups, presided over by PAC commissioners. Dalradian has the process from submission of the application since it provides an opportunity for independent scrutiny in an open and transparent forum.

The public inquiry gives all interested parties another chance to have their voices heard. Following the inquiry, the commissioners will write a report summarizing their key findings, with their recommendation about whether the project should be approved by the Department for Infrastructure (Dfl). Following review by Dfl, a decision will be made.





Buildings designed to blend in with local area





Mining and some processing underaround. minimising the surface footprint

Remaining waste rock contained in an engineered dry stack. This will be progressively reclaimed, planted and contoured during operations to reflect the local landscape.



# Dalradian in Numbers



#### minimum committed to future community projects

1.000

including direct, indirect and induced, across a range of skill sets



10,000



£750m

planned expenditure on supply chain aligned to Tyrone's world-renowned mining and quarrying equipment manufacturing sector

# 100% (23)

of water for mine operations will be sourced onsite, recycled and treated to agreed environmental quality standards before release

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Comprehensive page planning application submitted covering environment, health, social and economic studies

522 suppliers in Northern Ireland have contributed to the project to date





3.5m ounces: gold to be extracted

850k ounces: silver to be extracted





650 +

community groups supported with more than £1.2m from 2011-2022

years: anticipated life of mine. Resource is still "open" in all directions



15,000 tonnes: copper to be extracted

# £15 million

initial training package over 3 years to maximise local employment





**Certified carbon** neutral for 2022

#### Governance

#### A solid framework of systems and policies sets the foundation for operating responsibly.

Each year, management update the company's policies and share them with staff and contractors for their review and consent. The current set of more than 30 policies provide guidance for our staff and contractors in people management, health and safety, environmental responsibility, communications and ethical business practices. They also describe Dalradian's approach to a family friendly workplace, flexible work, and protection of human rights.

Having these policies and systems in place also allows us to measure and improve our performance. Major policies are listed below:

**Business Conduct & Ethics** 

- Health & Safety
- Environmental
- Carbon Management
- Anti-Corruption & Bribery
- Human Rights Commitment
- **Equal Opportunities Employee Data Privacy**
- Business Travel & Expenses
- Bullying and Harassment
- Family Friendly (Maternity, Paternity, Shared Parental Leave, Adoption)
- **Drug and Alcohol**
- **Dignity at Work**
- Flexible Working



3 GOOD HEALTH AND WELL-BEING









### Dalradian are members of the following associations:

British Chamber of Commerce	omagh
The Many Acceler of the United Engelses	
Compa Northern Invland examination indexasts instantable solutions	CHAMBER



NI Chamber of Commerce and Industry is a globally connected network, powered by businesses across Northern Ireland. Events at the regional level as well as in the local chambers in Belfast, Londonderry and Omagh, provide opportunities to trade, learn, network and promote our business. The British Irish Chamber of Commerce is a broader forum

for engagement with industry and government across the UK and Ireland. Through the various chambers, we have been able to present supplier opportunities both on a group and individual level, growing awareness of the broad nature of the supply chain for our proposed modern mine and the regional benefits of the project.







### SASB Metals & Mining Standard

The table below cross-references our results to the Sustainability Accounting Standards Board (SASB) framework. The SASB Metals & Mining Standards identify the environmental, social and governance (ESG) issues most relevant to our industry.

Topic/Code	Requirements	2020	2021	2022	Notes
Greenhouse Gas I	Emissions				
EM-MM-110a.1	Gross global Scope 1 emissions, Scope 2 emissions, Scope 3 emissions; percentage covered under emissions-limiting regulations	195.9 tonnes 16.6 tonnes 78.3 tonnes* 0%	182.8 tonnes 1.7 tonnes 42.1 tonnes 0%	116.4 tonnes 0 tonnes 51.2 tonnes 0%	p. 33 * 2020 numbers have been restated - overall lower by 58.2 - due to errors in the original calculation
EM-MM-110a.1	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Partially reported	Partially reported	Partially reported on p. 36	
Air Quality					
EM-MM-120a.1	Air emissions of the following pollutants: (1) CO, (2) NOx (excluding N2O), (3) SOx, (4) particulate matter (PM10), (5) mercury (Hg), (6) lead (Pb), and (7) volatile organic compounds (VOCs)				Not reported
Energy Managem	ent				
EM-MM-130a.1	<ul><li>(1) Total energy consumed,</li><li>(2) percentage grid electricity,</li><li>(3) percentage renewable</li></ul>	1,063,110 kWh 100% 0%	830,107 kWh 100% c.90%	586,322kWh 100% 100%	The figures include all scope 1 and 2, plus employee- owned vehicle travel.
Water Manageme	ent				
EM-MM-140a.1	(1) Total fresh water withdrawn, (2) total fresh water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	0 cubic metres 0 cubic metres	0 cubic metres 0 cubic metres	0 cubic metres 0 cubic metres	
EM-MM-140a.2	Number of incidents of non-compliance associated with water quality permits, standards, and regulations	0	0	0	
Waste & Hazardo	us Materials Management				
EM-MM-150a.1	Total weight of tailings waste, percentage recycled	0 tonnes not applicable	0 tonnes not applicable	0 tonnes not applicable	
EM-MM-150a.2	Total weight of mineral processing waste, percentage recycled	159 tonnes 0%	0 tonnes 0%	0 tonnes 0%	
EM-MM-150a.3	Number of tailings impoundments, broken down by MSHA hazard potential	0	0	0	
Biodiversity Impac	cts				
EM-MM-160a.1	Description of environmental management policies and practices for active sites			p. 32-37, 40	Ecological Impact Assessment included in planning application includes the mitigation actions that are required for the construction and operations phases

Topic/Code	Requirements	2020	2021	2022	Notes
Biodiversity Impac	cts				
EM-MM-160a.2	Percentage of mine sites where acid rock drainage is: (1) predicted to occur, (2) actively mitigated, and (3) under treatment or remediation	0% for all three	0% for all three	0% for all three	
EM-MM-160a.3	Percentage of (1) proved and (2) probable reserves in or near sites with protected conservation status or endangered species habitat	100% for both	100% for both	100% for both	
Security, Human F	ights & Rights of Indigenous Peoples				
EM-MM-210a.1	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	0% for both	0% for both	0% for both	
EM-MM-210a.2	Percentage of (1) proved and (2) probable reserves in or near indigenous land	0% for both	0% for both	0% for both	
EM-MM-150a.3	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict			Engagement processes on p. 21-23, 25, 29; policies on p. 56	Not applicable (indigenous rights and areas of conflict)
Community Relati	ons				
EM-MM-210b.1	Discussion of process to manage risks and opportunities associated with community rights and interests			p. 10-13, 22-23, 28-29	
EM-MM-210b.2	Number and duration of non-technical delays		0 days	0 days	
Labour Relations					
EM-MM-310a.1	Percentage of active workforce covered under collective bargaining agreements, broken down by U.S. and foreign employees		0%	0%	
EM-MM-310a.2	Number and duration of strikes and lockouts		0 days	0 days	
Workplace Health	a & Safety				
EM-MM-320a.1	<ol> <li>MSHA all-incidence rate,</li> <li>fatality rate,</li> <li>near miss frequency rate (NMFR) and</li> <li>average hours of health, safety, and emergency response training for</li> <li>full-time employees and</li> <li>contract employees</li> </ol>	0 0 2.32 25 hours 0 hours	0 0 12 hours 0 hours	0 0 9 hours 0 hours	
Business Ethics &	Transparency				
EM-MM-510a.1	Description of the management system for prevention of corruption and bribery throughout the value chain				Have an anti bribery and corruption policy that is compliant with UK Bribery Act
EM-MM-510a.2	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	0 tonnes	0 tonnes	0 tonnes	
Production					
1. Metal 2. Finished metal products		0 tonnes 0 tonnes	0 tonnes 0 tonnes	0 tonnes 0 tonnes	
Workers					
Employees		38	37	31	
Contractors		15.6%	14%	16.2%	





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# DALRADIAN