

Earth Resource Investments AG

Dorfstrasse 1
6300 Zug
Switzerland
Tel: +41 41 72 888 49
Email: p.berlenbach@earth-investment.com

17 March 2021

RE: PROPOSED CHANGES TO THE SASB METALS & MINING AND COAL OPERATIONS STANDARDS

Dear SASB Team,

The Earth Resource Investment Group is a speciality investment boutique analysing natural resources companies for potential investment. The Group advises around € 250m allocated in three UCITS V funds that invest in global mining equities across the commodity space.

We have a strong focus on evaluating the mining companies from a sustainability perspective and have developed an in-house matrix, based on an academic study, to analyse the companies on a very granular and technical level. Tailings management is a key factor in this matrix. We therefore would like to actively participate in the proposed changes to the standard.

Question 1: Do you support the proposed changes to the Metals & Mining and Coal Operations Standards?

Our answer: Yes

Question 2: Do you support the expanded approach on tailings storage facilities management, including the creation of its own disclosure topic?

Our answer: Yes

Question 3: Do you agree with the Board's conclusion that presenting tailings storage facilities inventory in a table format would be more useful than disclosure that is aggregated at the company level? Do you agree that company disclosure preparation costs for the table would not be significantly greater than the alternative?

Our answer: Yes

Question 4: Do you agree with the Board's conclusion that a disclosure capturing all hazardous waste incidents is more useful than one focusing only on hazardous raw materials or one that

requires separate disclosure of incidents involving hazardous raw materials versus other hazardous wastes?

Our answer: Yes

Question 5: Do you agree with the Board's decision to retain the Waste Management disclosure topic in the Coal Operations Standard? Should any of the corresponding metrics be excluded?

Our answer: Yes

1) Page 19 section 35: The Board proposes to remove the sub-metric "percentage recycled" from the existing metric EM-MM-150a.1. Total weight of tailings waste, percentage recycled:

Our position:

Although we recognise the small or even negligible impact of using or recycling tailings material as construction materials or for similar purposes, we feel it important to differentiate between underground operations and open pit mining operations.

In underground operations and where active backfilling is required due to geotechnical reasons (e.g., no block- or sub level cave operations), it must be stated why tailings are not actively used for backfilling. Hence for underground operations it is our view that the inclusion of a "percentage tailings recycled for backfilling" would be a preferable metric.

These amounts can be substantial and potentially amount to 50% of total tailings produced.

2)EM-MM-540a.1. Tailings storage facility inventory table:

Our position:

We recommend expanding the table to include the following metrics:

- Tailing dam construction method (upstream, downstream, centre-line or a combination of the aforementioned)
- Maximum dam height
- Tailings material placed in facility: dry stack material or wet tailings

These additional metrics are mentioned in table form already by some companies such as AngloAmerican or BHP. A tabled summary serves the evaluation process well, and we are in full support of such an inventory table.

We thank you for this opportunity to participate in the formulation of this standard.

With best regards,

Pereshia Berlenbach for the Earth Resource Investment Group Team