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Mansfield Minera's Approach to Corporate Social Responsibility

Report of a Field Study Conducted in October 2011

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Ottawa, February 2011

Table of Contents

Acknowledgements	3
Executive Summary	4
Purpose	5
Background	5
Observations	14
Key Findings in the Context of e3Plus	15
Discussion	24
Interview Guide	27

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Executive Summary

This document reports the results of a field study that was conducted October 11-15, 2011. After a description of the context (company, area, and social and environmental factors) and of the field observations, the results are discussed in terms of relationships at play and of the degree of alignment between the Prospectors and Developers Association of Canada (PDAC) "Principles and Guidance" of "e3Plus, Framework for Responsible Exploration" and Mansfield Minera's CSR practices.

Relationships are a core competency of Mansfield Minera. From the very beginning of its operation it created company-wide awareness of CSR and its importance and made a conscious decision to embrace CSR in its operations. Mansfield Minera applied its core competency of building and maintaining relationships throughout the CSR implementation process, using an informal approach. This appears to be a natural extension of the company's internal value system to its interactions with the society of which it forms part.

Mansfield Minera's approach aligns remarkably well with the e3Plus Principles described in the PDAC's "Principles and Guidance" booklet.

Mansfield Minera's experience shows that it is possible for small companies to design and implement a CSR strategy without going broke when the following key ingredients are in place: leadership and values of principals and management; time and patience; natural talent of key players; management style; and rootedness in the region. Of these, only time may be an insurmountable barrier for many exploration companies. However, this may change if investor attention being paid to community relations keeps increasing at its current rate.

Purpose

The purpose of the field study was to understand the role of relationships in Minera Mansfield's positioning with respect to Corporate Social Responsibility (CSR) and in the design and implementation of CSR practices. Also, to compare Mansfield Minera's CSR practices to those described in the "Principles and Guidance" of "e3Plus, Framework for Responsible Exploration" that were developed by the Prospectors and Developers Association of Canada (PDAC).

Background

The investigator responsible for this report is Jan Boon, a Ph. D. student in the Department of Sociology and Anthropology, Carleton University. He also was a member of the Prospectors and Developers Association of Canada Field Team that visited mineral exploration projects to evaluate the efficacy of its e3 Plus CSR toolkit. Taking advantage of the team's presence in the region, he requested Mansfield Minera's permission to visit its exploration project in Salta, Argentina, and the company graciously agreed. It has not yet formally adopted one of the various CSR tools that are available, and much can be learned from its experience of "going it on its own".

The author conducted semi-structured interviews with company employees and with external stakeholders that include municipal authorities and employees, indigenous representatives, provincial politicians, legal authorities, and CSR experts from other companies. In contrast to the interviews used with other companies that were designed to evaluate the efficacy of e3Plus, the interviews used with Mansfield Minera focused more on the research questions of the author's Ph. D. project, i.e. they paid particular attention to relationships (see the interview guide shown on page 28).

The visit took place from October 11 to October 14, 2011. October 11 was spent in Salta meeting with the Chamber of Mines, company staff and a member of the provincial legislature. On October 12, the author traveled to the project site with the director and the CSR manager and on October 12, 13 and 14 he interviewed company staff and external stakeholders. During the return trip to Salta on October 14, it was possible to conduct one interview in San Antonio de los Cobres. On October 15 the author had a conversation in Salta with a CSR expert from a different company about the context for CSR in the province. In total, around 40 people were involved in interviews or conversations. Of these, about half were external to the company. Because of time limitations, some of the interviews and conversations were conducted in a group format (e.g. the interview with about 10 staff in the Arita camp and the conversation with 15 members of the Chamber of Mines).

This report does not constitute an audit. Rather, it reflects on some of the company's current practices and on any issues that were raised. As the visit allowed only for a broad overview of perspectives garnered during a limited number of days, the author did not have time to follow up on various perspectives offered by interviewees. Thus, these findings are preliminary and further study and discussion may be of merit.

Context

The following is a brief introduction to some of the local and regional characteristics of the context within which Mansfield Minera operates.

The company

Mansfield Minera has been active in Salta since 1994, and in 1999 discovered the Lindero prospect that was brought to the pre-feasibility stage in 2010. The company has a working capital of C$ 4.4 million, with 5 626 221 fully diluted shares that were trading at C$ 1.36/share on December 9, 2011. The pre-feasibility study indicates proven and probable reserves of 1.92 million ounces of gold and, assuming a discount rate of 8%, a pre-tax Net Present Value of US$ 157.1 million[1]. Mansfield Minera has a 50% share in Regulus' Río Grande project through its spin-out Pachamama Resources. The Río Grande prospect was discovered by Mansfield explorationists.

The principals and the director have worked with the company since the beginning. Finances and resources have been managed very cautiously over the life of the project, as is evident from the somewhat unusual length of time it took to develop the project. A disadvantage of this approach was the loss of some shareholders, but sufficient patient shareholders remained to continue the project. However, as will be seen later, the cautious approach paid off in other ways.

According to the director, Vancouver head office fully trusts the local office and gives it great freedom of action while at the same time setting clear and sufficiently broad boundaries. The company is thorough and patient. The director has been and continues to be the main driver of the company's CSR strategy and initiatives. He is from Salta, knows the area well and has a vast network of contacts. One year ago he attracted a CSR manager who is a psychologist born in the puna and who knows the people and the area very well. The director is also the President of the Salta Chamber of Mines, a function that, with approval of head office, takes 70% of his time. Through this role he is very well connected to many sectors of Salta society and he has thorough background knowledge of much that goes on in the Province. The company has an office in Salta that handles purchases, administration, government relations, core shack and logging of core. The Arita field camp is located at the project site and consists of a number of portable buildings that contain an office, a meteorological station, sleeping quarters; a diesel electricity generator, showers and a dining room. Photographs 1, 2 and 3 show the field camp, the road from the field camp to Tolar Grande, and the Lindero property.

The area

The Province of Salta is located in the north-western part of Argentina. It borders Bolivia and Paraguay to the North; Chile to the West; the province of Jujuy to the North and West; the provinces of Formosa, Chaco, and Santiago del Estero to the East; and the provinces of Tucumán and Catamarca to the South. It covers an area of 155 488 square kilometres and its landscapes range from the green forests in the East, through deep valleys and ravines in the centre to the puna, the arid high plains in the West. Its capital of the same name is the seat of the provincial government[2] . Figure 1 shows the political division of the province into 23 departamentos[3].

Mansfield Minera's Lindero project is located in the puna, in the Departamento de los Andes. It can be reached by road (paved part of the way) from Salta, through San Antonio de los Cobres. The driving distance is about 420 km, which takes some 8 hours. The project is located at 75 km.

[1] http://www.mansfieldminerals.com/i/pdf/factsheet.pdf , http://www.mansfieldminerals.com/s/Home.asp , "Lindero Project, Salta Province, Argentina, NI 43-101 Technical Report", March 2, 2010, Amec

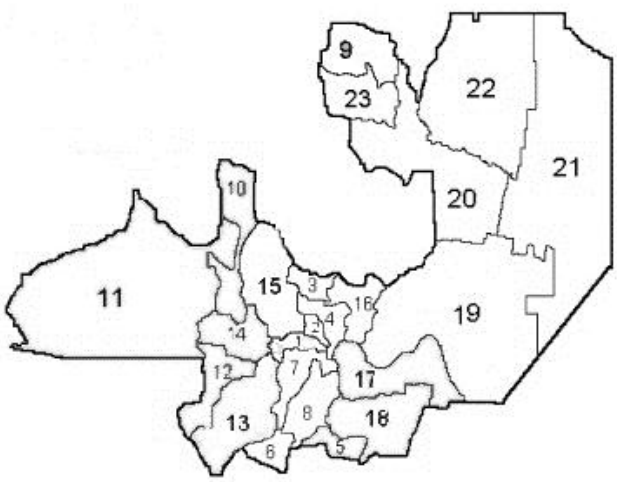
[2] http://turismo.salta.gov.ar/contenido/1/geografia-salta

[3] http://biblioteca.afip.gob.ar/afipres/SALTA.htm

southwest of Tolar Grande, the town closest to the project is. It lies at an altitude of approximately 4500 m. above sea level. Figure 2 shows a project location map[4], and Figure 3 shows local details[5]. The Arita camp is located on the edge of Salar Grande, at the circular loop in the road. The average annual temperature is 4 °C, with monthly averages of 8 °C in January – February and – 3°C in July. The temperature difference between day and night can reach 15°C. Average annual precipitation is 37 mm, distributed unevenly throughout the year. Average relative humidity is 33%[6].

Salta has been producing borate minerals for many decades, with lithium chloride being added recently. In 2010, the value of mineral production was $ 23.8 million for Lithium Chloride and $ 33.6 million for a variety of borate minerals. These minerals are recovered from the extensive salt flats found in the puna. Many companies are exploring for metals other than lithium as well, and various projects have reached the pre-feasibility stage. The province strongly supports mining as a means of reducing unemployment and presents a stable investment environment[7] .

Figure 1. The departamentos of the Province of Salta.



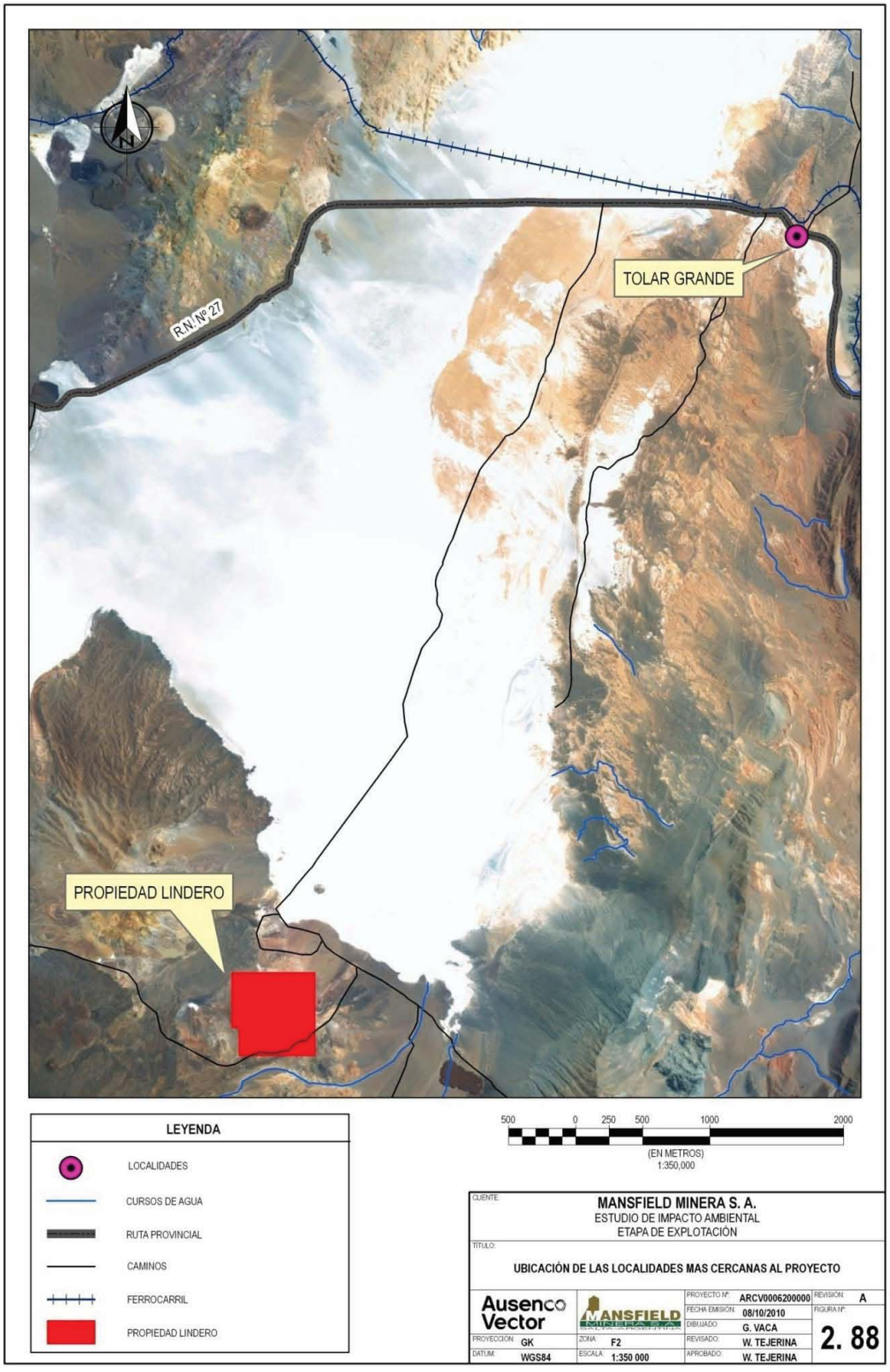
1. Chicoana	**7.** La Viña	**13.** San Carlos	**19.** Anta
2. Cereillos	**8.** Guachipas	**14.** Cachi	**20.** Orán
3. La Caldera	**9.** Santa Victoria	**15.** Rosario de Lema	**21.** Rivadavia
4. La Capital	**10.** La Poma	**16.** Gral. Guemes	**22.** San Martín
5. Candelaria	**11.** Los Andes	**17.** Metán	**23.** Iruya
6. Cafayate	**12.** Molinos	**18.** Rosario de la Frontera	

[4] "Lindero Project, Salta Province, Argentina, NI 43-101 Technical Report", March 2, 2010, Amec, p. 2-2
[5] Informe de Impacto Ambiental Proyecto Lindero Mansfield Minera S.A., October 2010, p. 317
[6] "Lindero Project, Salta Province, Argentina, NI 43-101 Technical Report", March 2, 2010, Amec, p. 5-1
[7] http://www.argentinamining.com/en/salta-la-proxima-frontera-de-la-mineria-argentina/

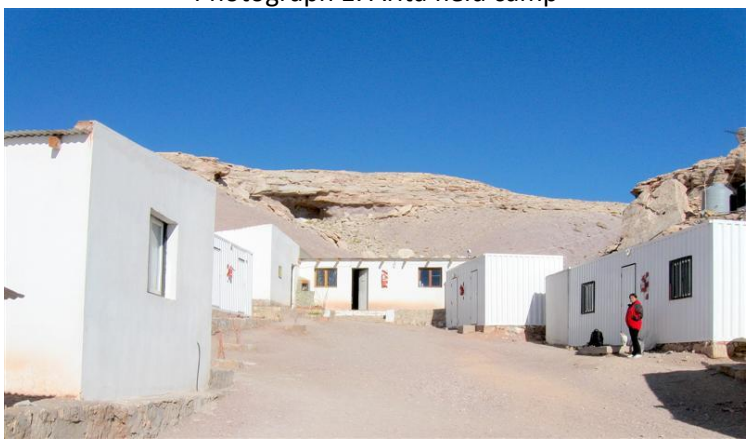
Figure 2. Project location



Figure 3. Location details. The white area is the Salar Grande salt flat.



Photograph 1. Arita field camp



Photograph 2. View of Salar Grande and road to Tolar Grande from the Arita field camp



Photograph 3. Lindero property, located immediately south of the Arita field camp



Social and Environmental Context

The total population of the Province of Salta was 1 215 207 in 2010, an increase of 13% since 2001. The total number of homes was 324 069 and the index of masculinity was 97.5, indicating a slight preponderance of females over males. The Departamento de los Andes in which the project is located had 1 869 homes and a population of 6 126. Interestingly, its index of masculinity was 114.3, indicating a significant preponderance of males[8] . It is beyond the scope of this report to speculate on the reasons for this; however, deeper insight might reveal factors that are relevant to CSR initiatives. The average population density of the province as a whole is about 7 inhabitants per square kilometer, while for the Departamento de los Andes it is only 0.2. There are two municipalities in the Departamento de los Andes: San Antonio de los Cobres and Tolar Grande with 5482 and 148 inhabitants (2001 census), respectively. For San Antonio de los Cobres this represented an increase of 16% and for Tolar Grande a decrease of 38% as compared to 1991, respectively[9]. San Antonio de los Cobres is important from a company and CSR perspective because it is the "cabecera" (administrative centre) of the region. The large fluctuation in the population of Tolar Grande is possibly related to the ability to make a living. While it was not possible to access recent census data through the Internet, the present population of Tolar Grande is reported to be around 168, indicating stabilization since 2001.

Table 1 summarizes some social indicators for the region. Basic needs are unmet if at least one of the following conditions applies: (i) 3 or more persons per room; (ii) homes in an "inconvenient" type of housing (rented room; precarious or other type of housing, excluding a house, apartment, or hut; (iii) homes without any type of toilet (iv) presence of children between 6 and 12 years of age not attending school; (v) households with four or more members per working person, and where the head of the family has less than grade three education. The percentage of people living below the poverty line in Salta was 13.4% in 2001, compared to a national average of 9.4%, and 4% were living below the extreme poverty line, as compared to 4.8% nationally. The poverty line is defined by the ability of a household or individual to meet basic essential dietary and non-dietary requirements. The extreme poverty line is defined by the ability of a household or individual to meet basic essential dietary requirements[10] . The employment data in the table show that a very high proportion of Tolar Grande's labour force is working in the public sector.

The demographics of a society have important economic consequences. Table 2 shows two demographic measures: potential dependency (the ratio of the potentially not economically active population to the potentially economically active population – using age as a criterion) and "old age ratio" (ratio of people over the age of 65 to those under the age of 15)[11] . They say something about the present and future "burden" to be carried by the potentially economically active population.

[8] http://www.censo2010.indec.gov.ar/preliminares/provisionales.pdf

[9] ANUARIO ESTADÍSTICO PROVINCIA DE SALTA Año 2007 - Avance 2008

[10] http://www.indec.gov.ar/indec/ingles/iu020303.xls

[11] Informe de Impacto Ambiental, Proyecto Lindero, Mansfield Minera S.A., 2010

Table 1. Social indicators (2001 and 2010 census data) UBN = Unmet Basic Needs

Indicator	Salta	Depto de Los Andes	S. A. de los Cobres	Tolar Grande
Homes with UBN	28%	27%		
People with UBN	32%	42%		
Illiteracy	5%	10%		
People > 15 years of age not completing primary School	22%	37%	37%	25%
People completing secondary school	29%	15%	15%	31%
Access to social benefits	40%	34%	33%	61%
Employment data				
Unemployment rate	30%	19%	19%	17%
Number employed	278 164	1 397	1 329	68
Public sector	23.2%	34.0%	32.1%	70.5%
Private sector	43.3%	26.1%	26.6%	16.1%
Owner	3.5%	0.2%	0.2%	0%
Self-employed	25.0%	24.3%	24.8%	13.2%
Work for family	4.9%	15.3%	16.1%	0%

Table 2. Potential dependency and old age ratio

Location	Indices (%)	
	Potential dependency	Old age ratio
Provincia de Salta	72.1	16.8
Departamento de Los Andes	97.3	9.0
San Antonio de los Cobres	98.6	8.9
Tolar Grande	60.9	16.7

Mining context

According to a respondent, possibly some 60% of mining and exploration companies are beginning to pay attention to CSR. The Salta Chamber of Mining has started a CSR working group in which companies come together, exchange views and coordinate their CSR activities when it makes sense to do so. According to the same respondent, whether a company formally embarks on CSR depends on circumstances (staff with interest and skills, perceived urgency, competing priorities, etcetera). He remarked that, while there have been some improvements, university students do not learn enough about social practices and behavior. New geologists joining the company have to learn quickly, and in the respondent's company they generally do.

The borax mines in the province have had a long (70 years), stable relationship with the community and are considered to be part of it.

In a general discussion of CSR with a number of members of the Chamber of Mines topics raised included: letting communities decide; the difficulty of drawing people's attention to CSR ("there is little knowledge and many people don't know what you are talking about"); what actions a company should take when it interrupts activities for a while; what is Canada's CSR strategy?;

what kinds of new business models would work?; a lively discussion about companies that don't care and the problems they cause to others; the need to be up-front and transparent. Everyone recognized the basic themes of social conflict and the community factors in protests that have been identified by De Echave et al.[12] (shown in Table 3 and Table 4 below) and the importance of coordinating activities between companies to address these.

Table 3. Basic themes of social conflict

- Identity and respect (e.g. way of life, social significance of land, relational expectations)
- Defence of autonomy
- Risk perception
- Environment (water, soil, air)
- High expectations (employment and other benefits)
- Competition for resources (water, land)
- Development models
- History
- Mining legacy issues
- Distribution of economic benefits
- Existence of multiple hidden agendas
- Identity and respect (e.g. way of life, social significance of land, relational expectations)
- Defence of autonomy
- Risk perception

Table 4. Factors in community protests

- Environment (water, soil, air)
- High expectations (employment and other benefits)
- Competition for resources (water, land)
- Development models
- History
- Mining legacy issues
- Distribution of economic benefits
- Existence of multiple hidden agendas

In the view of a participant, there are two types of exploration companies: (i) "Real estate agents" that look at their prospects strictly as "saleable property". There are many of these, and most are not very good at or interested in CSR. The author believes that this may change if the current trend, in which the quality of community relations is becoming more and more a decisive factor for buyers, continues. However, their mindset would still be driven mostly by pecuniary considerations that would shine through in the CSR approaches they might undertake; and (ii) companies with a real interest in the prospect and its characteristics and in the region and the communities. These companies tend to be much better at CSR.

Changing ownership of a project can affect its reputation and is also very confusing to communities.

[12] De Echave, Díez, Huber, Revesz, Ricard y Tanaka (2008), "Minería y Conflicto Social", Lima: Instituto de Estudios Peruanos, 271-288

The communications strategy of the Chamber of Mines was instituted when the current President took office 8 years ago. It focuses on outreach to all branches of government. The Chamber also organizes an annual event in San Antonio de los Cobres in which each company shows what it is working on and talks about its future plans. Through experience, the approach avoids mentioning the size of investments, uses simple language, doesn't use videos, and presentations are made by local employees. The event is combined with capacity building in the afternoon, so far mostly for municipal employees, emergency personnel and the like (e.g. ATV operation, defensive driving etcetera).

A respondent from the provincial legislature believes that mining is important for Salta. With respect to CSR, he appeared to be uncertain of the role of the provincial government (even though it has a corresponding Secretariat – author's comment). At the time of this study there were no operating metallic mines in Salta, but some projects are close to becoming operating mines. He believes that the government of Salta should start learning more about CSR as soon as the first mine starts operations.

The national government has passed a law that forbids mining in areas in or close to glaciers, and some believe this law to be a direct "attack" on Barrick Gold. As a countermeasure, the Salta legislature has passed its own glacier law on the grounds that glaciers are natural resources under provincial jurisdiction. This example is being followed by six other provinces. The province of San Juan is taking the national government to court arguing that the national glacier law is unconstitutional. While a number of provinces have prohibited open pit mining, Salta has not done so.

An external interviewee remarked that communities in Salta do not have an entitlement attitude, whereas in Jujuy they do. This could be related to Jujuy's proximity to Bolivia, where this respondent believes entitlement attitudes to be rampant. This interviewee also commented that it takes a long time (more than 25 years) to become accepted in the region. The local culture is strongly religious (Catholic and indigenous beliefs are thoroughly mixed), family-oriented, and machismo reigns. A man's sexual straying is tolerated as long as he remains firmly tied to home. Companies have to hire local people to do well in CSR - culture is extremely important.

Observations

The observations in this report represent a snapshot of ideas and observations of Mansfield Minera's operations in October 2011, and are based on the interviews and conversations mentioned earlier. While the interview guide did not follow the structure of the e3Plus Principles, the author decided to report his findings using that structure to facilitate comparison with other case studies that were based on e3Plus. This may also prove useful to Mansfield Minera. However, because of the particular focus of the present study, some of the Principles were not discussed in much detail and additional information would need to be gathered for a complete comparison. The key findings reported below paraphrase and summarize the content of interviews and conversations with employees and external stakeholders.

Key Findings Viewed in the Context of e3 *Plus* Principles

1. Adopt responsible governance and management

On the basis of its observation of other companies, Mansfield Minera believes that rules-bound companies that have a "tight" approach are not as interested in or as good at CSR as companies that are run in a more flexible way. As a result, the company entrusts its employees with a fair degree of flexibility. A number of them commented that they like working for Mansfield Minera because they know what is expected of them and they are left free to decide how they want to go about achieving their goals. New employees usually ask for a detailed job description, but they are told that while everyone has a major area of activity, they are also expected to pitch in wherever necessary (e.g. take part in the vaccination of llamas). Management emphasized repeatedly that all employees understand that (i) the whole has to benefit and (ii) all are members of a team and this means that duties have to be shared within logical limits. Hierarchy does exist in the company but it is built on context, experience, agreement and understanding. As an example: a new employee with a university degree had almost automatically assumed that he could order certain employees to carry out a certain task. He had not realized the context: these employees had for years decided how they go about their tasks, how and in what order they carry them out, and therefore the new employee needed to take a different approach. Some employees compared the company with a family, a comparison supported by the fact that two generations from a number of families are represented among employees.

An employee commented that he had previously worked in a large company that was much more rules-bound and bureaucratic, and that he likes his present employment much better. All employees that were interviewed gave the impression to be content in their present setting. On a number of occasions they specifically mentioned that it is part of their duties to contribute to the community.

In the field camp, the geologists are the leaders. When they are not present, a senior assistant takes on the leadership role. Daily work in the field camp includes prospecting, camp maintenance, airstrip construction, and any other duties as needed. According to the employees working in the field, people work as a team and rotate tasks on the basis of mutual understanding. The company is very flexible both in terms of letting employees decide how they want to approach their tasks and giving them time off when the need arises (e.g. illness in the family, feeling ill at ease in the camp, etcetera). The effect of such absences on workload is handled on a team basis. Camp rules are strictly enforced, for example when alcoholic beverages were found in the locker of one employee he was immediately dismissed and this did not generate any protest on the part of the other employees.

The three managers in the Salta office of Mansfield Minera decide on most CSR issues and actions. Everyone is made aware of these decisions and they are taken into account in logistics, purchasing and other company activities. There is open communication about all this. "There is nothing new about CSR – Mansfield Minera has been taking this approach for the past 14 years." While CSR is approached in an informal way, everybody knows about it and suggestions and issues are discussed as a group. Some employees mentioned that what they know about CSR they have heard from the director, and they also have looked it up on the Internet.

Mansfield Minera maintains close links with the legislative, juridical, and executive branches of government and also with the Catholic Church. They consider it important for the industry voice to be heard and to make sure that industry at least is consulted. As a result of this outreach, the director often is called by members of the various branches of government to ask for

information.

Mansfield Minera takes a very active part in the Salta Chamber of Mines and as a result is able to influence the behaviour of other companies. For example, informal conversations with a particular exploration company that was unduly raising expectations and thereby causing problems for other companies in the area were sufficient to bring about a change.

When Mansfield Minera's Environmental Impact Assessment is approved a mine could be in operation one and a half years from now. The company faces a tough choice: does it sell the prospect to a mining company (thereby potentially putting its obligations to its employees and to the communities at risk) or does it convert itself into an operating company (which involves a huge risk as they don't have any operating experience). An intermediate option may be to strike a deal with a mining company willing to act as an operator in return for becoming part owner. It is not yet clear what the decision will be.

In terms of the subheadings of principle 1 mentioned in the "Principles and Guidance" booklet, Mansfield Minera has developed its corporate capacity, complies with legal requirements, ensures that its contractors meet standards and interacts intensively with governments. It does not appear to have had a need to draw on civil society expertise and resources to meet its objectives.

2. Apply Ethical Business Practices

It is important to coordinate activities between companies and the Salta Chamber of Mines has started a CSR working group in which companies come together, exchange views and coordinate their CSR activities when it makes sense to do so. In the opinion of Mansfield Minera management, social responsibility has to be shared by all actors - it is a duty of all. For example an external stakeholder mentioned in a conversation that a present issue of great concern is that a particular mine is not being managed in a responsible way and may be using illegal practices such as using unregistered labour and not paying into social security. Other companies are exerting pressure on this mine to cease such illegal practices.

With respect to other subheadings of Principle 2 that are mentioned in the "Principles and Guidance" booklet, many of the general aspects such as commitment to ethical standards and their communication, reporting of violations, avoiding complicity; conduct of exploration; transparency and accountability; and bribery, corruption and conflict of interest either did not come up specifically in the interviews and conversations or form part of the observations under other principles.

3. Respect Human Rights

In terms of the "General Aspects" category described in the "Principles and Guidance" booklet, there was no occasion to discuss corporate policies and procedures. A formal risk assessment may have been conducted at the beginning of the project, but as the company is now well rooted in the local and regional context and is well aware of local intricacies, CSR risks appear to be low. Conversations with company employees and external stakeholders, including the local cacique indicate that there have been no significant human rights issues in the history of the project.

With respect to employment, the company is very flexible in solving problems and is going very easy on employees. If they are sick, or need to resolve a problem at home suitable

arrangements are made so that they can take care of them. This also happens when someone gets ill at ease with camp life and needs a break to sort things out. According to two interviewees life in the camp is like living in a family. In addition to doing one's job right, it is important to provide good service to others and treat everyone with respect. The field crew is important. Problems, if they occur, are usually small and it is very important to maintain good relations. Things always get talked over and there is a good dialogue 90% of the time. Employee comments cited in other sections of this report further support the above comments and indicate that employees are treated with respect and equity, and that they have opportunities for personal growth. Also, the company does observe traditions and takes part in associated celebrations (e.g. Catholic festivals, PachaMama).

In terms of dealing with communities, a later section on community engagement describes Mansfield Minera's practices in some detail. The company's practices are similar to those guidelines relevant to its operation in the "Principles and Guidance" booklet.

So far there has been no need to hire security personnel. In terms of security of the local population and visitors to the region, the exploration companies and the municipality of Tolar Grande hold regular meetings where emergency and safety and security measures are discussed and related protocols agreed on. For example, they have produced a map of the area that shows the location of roads, mining camps, areas covered by cellular phone towers, shelters, nature reserves etcetera. On more than one occasion Mansfield Minera and other exploration companies have had to salvage tourists that became stranded "in the middle of nowhere".

4. Commit to Project due Diligence and Risk Assessment

There was no occasion to discuss this principle in detail. As Mansfield Minera is managed with great caution and patience, it most probably exercises due diligence.

5. Engage Host Communities and Other Affected and Interested Parties

Weaving together the conversations and interviews with employees and external stakeholders produced the narrative below.

Mansfield Minera has become part of the community of Tolar Grande, partly because the company has been there for a long time and partly because it has paid much attention to building the relationship. The most important community relationships in the area are those with the mayor of Tolar Grande and with the mayor of San Antonio de los Cobres. While Tolar Grande is a fairly united community, it still takes much effort to get the people together for making decisions. The community is well aware that the opening of a mine will cause enormous changes, and they are preparing for this through a municipal plan. The mayor of Tolar Grande has been in place for eight years and was recently re-elected with a huge majority (95% according to a respondent). He is very well respected. Community members not working in the public sector are employed by a variety of exploration companies and there is no negative attitude towards mineral exploration. Relations with the mayor of San Antonio de los Cobres are tense, he has been negative towards company involvement with the community, and has asked companies to stay out. He is also levying a type of tax on mineral exploration companies that has been steadily increasing over the years, but it is not clear what the funds thus collected are being used for. In December there will be a new mayor with whom Mansfield Minera has an excellent relationship and they hope hat they will be able to contribute more to the community.

There is not much conflict in Tolar Grande and most issues get settled in a "natural" way (still, the author observed friction about some issues between key community personalities).

Decisions are made by consensus by those who participate in the debate. Sometimes this leads to complaints by those who (of their own volition) did not take part in the discussions. Decisions are usually made fairly quickly. The village fiestas (religious, indigenous, mother's day, and cultural occasions) are very helpful in this respect - many things are talked out during those events. Many people are employed in construction (presumably for the municipality) and don't work during the winter when construction is impossible. A number also work for exploration companies. The mayor sees tourism opportunities in the future of Tolar Grande, which would require that a balance between mining and tourism be found.

Another important relationship is that with the cacique in Tolar Grande. All activities related to indigenous issues in Tolar Grande (cultural, inclusion, etcetera) are coordinated by the elected cacique. The Instituto Provincial de Indígenas de Salta (IPIS) (Provincial Institute of the Indigenous People of Salta) played a significant role in establishing respect for the cacique's position.

The mayor of Tolar Grande is concerned about the depopulation of towns and villages, as are members of the Chamber of Mining. The author of this report heard about an example of this process when he interviewed a person in San Antonio de los Cobres who plans to move to the city of Salta as soon as his wife becomes pensionable. All their children have moved to the city over the years for reasons of employment and education. Many hope hat mining will provide employment that will help stop the bleeding.

Relations with the school personnel are also important.

The author's observations indicate that Mansfield Minera's relations with stakeholders in Tolar Grande are good. Also, that company personnel was very cordially greeted and became involved in lengthy discussions with a number of people during a stop in San Antonio de los Cobres.

Because Mansfield Minera has been around for a long time, community expectations are realistic and the company can say "no" to certain requests for assistance. The company has developed guidelines with respect to requests for support and contributions to the community. They are reproduced below.

1. Always try to ensure that requests to the company are made in the presence of two or more people that have no direct relation to each other.
2. The request should be submitted in writing, describing details, giving the names of the requesters, and mentioning the reason for the request.
3. Requests should be submitted directly to the responsible authority in the company to ensure that the resulting support will be viewed as being provided by the company, and will not be associated with a particular person in the company.
4. Support and donations **always** have to be provided in the presence of more than one person, directly to the requester, and **never** through intermediaries.
5. A receipt should be signed to register the donation. In some cases it is also advisable to request a written note of thanks, for company audit purposes.
6. Ensure that the request relates to a general use or purpose for the entire community and that it provides a lasting benefit (i.e. food, fuel and other consumables are excluded).
7. Try to rotate the benefits as much as possible to avoid always favouring the same sectors.
8. Learn to say NO on occasion and explain the reasons. Do not postpone saying no to a later date.
9. Never give money, as this does not contribute to the goals of CSR and is undoubtedly

counterproductive.

Other companies have had difficulties in this respect. Some donate much more to the communities than does Mansfield Minera, but are less trusted because they become invisible every time there is a lull in exploration activities. Also, because they hardly ever say “no”, demands keep increasing.

As mentioned earlier, the company’s CSR effort is spearheaded by the director and the CSR manager. While the latter had opportunities to work with other exploration companies, she waited till a position in Mansfield Minera became available – supporting the earlier observation that Mansfield Minera’s has a good reputation in the area. The company firmly believes that local management should be from the region and part of the local scene. As an example, the director mentioned that many doors open when people can place managers in the local context (e.g. their family background, the organizations to which they belong, the school their children attend). The company considers diplomacy to be of the utmost importance, and Mansfield Minera’s employees are its ambassadors in the community. It is therefore important that their behaviour be beyond approach. This mostly works well, but as Mansfield Minera has no “jurisdiction” over employee behaviour outside work certain situations pose a challenge.

Staff engaged in prospecting and exploration activities said that they always ask for permission to enter the property, and that generally the people don’t object. They take a photograph and record the name of the person with whom they talked. They have been doing this work for the past 13-14 years and they know that people of the puna want companies to behave well. It is company policy to take along community members from Tolar Grande who need to travel to San Antonio de los Cobres or to Salta on the weekly trip between Salta and the Arita field camp and back. While CSR is approached in an informal way, everybody knows what is expected:

> “All actors are important. We know everyone, and everyone is important. We have never had any conflicts. We have some concerns about the future when the project will expand. However, we feel that we have planted the seeds for a good harvest. Even though CSR was not formally introduced, management has always made it perfectly clear that all people should be respected and treated well, whoever they are. From our perspective, the relations with the people of Tolar Grande are the most important, but really everybody is important. We act as the eyes and ears of the company and when we see or hear something that falls outside our range of responsibility we advise the director who then takes action at a higher level.”

When probed about conflicts they said that sometimes frictions do occur, like in any family or community. They feel they are part of the community and talking usually resolves problems. On a number of occasions the community itself resolves problems, for example when some people said things about the company with which others didn’t agree, community members resolved the issue amongst themselves and the matter was settled.

Other employees commented that the community is concerned about the future: what will happen when the ore body is exhausted and the company will leave? To discuss these and other matters, a meeting with the community is held three to four times per year or as the need arises. The company also participates in all religious and cultural events, and many employees are community members. Relations with the community are close and the director often receives calls about community problems even before the mayor does.

The following summarizes a group interview with camp staff:

> “We all belong to nearby communities and often meet with community members during our

work. We routinely give community members rides and when other requests are made or problems crop up we usually talk them over as a group. The group leader (who may be a geologist or, when the author was there, a senior assistant) decides how to approach the situation based on the discussion. There have not been any significant problems that we can remember."

6. Contribute to Community Development and Social Wellbeing

A member of the provincial legislature believes that capacity building in many areas is a very important contribution companies can make, so that people can continue to live after mines close. The future mayor of San Antonio de los Cobres plans to use some of the levies the present mayor is extracting from exploration companies for capacity building and reduce the levy on companies that are providing capacity building. Skills mentioned include bakery, carpentry, and plumbing.

The author had a conversation with a neighbour of Minera Mansfield who lives in the Cavi oasis, some 20 km. south of the Arita camp site and makes a living from his herd of llamas, sheep and goats, producing wool, weaving blankets and the like, and growing a few vegetables. Photographs 4, 5 and 6 show the road to the Cavi oasis and the oasis itself. He was born and grew up in the house where he still lives and is the only family member still there. His life has been hard, with often having to walk his herd to areas where there was sufficient pasture, sometimes more than 100 km. away. A few years ago he was joined by a single mother and her young son (a survival strategy for all involved - together they look after the farm). He said that the roads constructed by the exploration companies are making a huge difference – now he can get rides and reach communities in the area much more easily. The government installed a solar panel on his house that provides electricity, and Mansfield Minera installed a radio station for use in emergencies. He makes regular visits to the Arita camp, and once a week camp employees deliver a box of vegetables to his house (there is a reminder to that effect on the white board in the camp office). The municipality of Tolar Grande sent a truckload of rocks that he will use in the construction of a greenhouse, and Mansfield Minera has promised to help with other materials. The company also promised to assist him with obtaining his pension – the CSR

Photograph 4. Road from the Arita field camp to Lindero and to the Cavi oasis



Photograph 5. Cavi oasis.



manager will accompany him on his visits to government offices in Salta. All staff took part in the vaccination of the herds of llamas, goats and sheep in the vicinity of the Arita camp site, including those in the Cavi oasis. The company provided transportation, vaccine and organization. The province provided a veterinarian.

The main preoccupations of Tolar Grande's municipal secretary are water (the present source is running low) and capacity building - "the community's capacities are only so-so". According to Mansfield's CSR manager, capacities needed include bakery, masonry, carpentry, and plumbing. The mayor's main preoccupation is the depopulation of the town because of lack of opportunities (the Chamber of Mining is discussing this problem and looking at things such as jobs and scholarship schemes tied to the town). He also considers environmental matters and capacity building to be important. As was mentioned before, the municipality and the companies meet as a group regularly to discuss and develop emergency issues, plans and activities and the mayor considers these to be very useful.

The cacique is also concerned about the water supply to Tolar Grande and the author was present during his discussion of a number of detailed technical issues and potential approaches

Photograph 6. Cavi oasis.



with a Mansfield Minera director. If the Provincial Water Resources Secretariat (Secretaría de Recursos Hídricos de la Provincia) has problems moving forward on this issue (they now have had proposals in hand for over four months), Mansfield Minera will be happy to work with other companies and the Secretariat to have the topographical survey done that is needed for the construction of a pipeline to bring additional water to town. The nature of the conversation suggested that the cacique considers indigenous involvement in the deliberations to be important. Subsequent to this conversation, Mansfield Minera coordinated the effort of a number of exploration and service companies working in the area to resolve the problem. It was discovered that water intake had become ineffective. Together with the municipality that is supplying the labour, the companies are replacing the drainage gallery and plan to complete the work by the middle of February 2012.

As mentioned earlier, Mansfield Minera has a policy of giving rides to people who need to travel to San Antonio de los Cobres or Salta. This way, they transport 120 of the 168 inhabitants of Tolar Grande each year, which provides many hours of face-to-face conversation with community members.

The Arita camp has an "open door" policy. Anyone is welcome to visit and many tourists who pass by the camp during organized excursions use the opportunity to drop in and enjoy refreshment or a cup of coffee. Many expressed surprise at the cleanliness of the site.

Mansfield Minera was involved in the signing of an agreement between the Salta Chamber of Mining, the Mining Secretariat of Salta, the Employment Secretariat of Salta, and the Secretariat of Small and Medium-sized Enterprises to support capacity building. The courses offered were in turn supported by other companies and foundations such as Fundación UOCRA (Unión Obrera de la Construcción de la República Argentina – Construction Workers Union of the Argentine Republic), Finning and Austin Powder, and Manpower. Courses offered included building, construction carpentry, electricity at home, mining safety and security, blasting and heavy equipment maintenance. These were offered in combination with intensive courses on the use of personal protection equipment, looking for work, and basic aspects of labour relations.

Mansfield Minera has identified health, education, and infrastructure as priorities for community support.

Mansfield Minera has constructed and maintains the road that connects the Arita camp with Tolar Grande (see the map in Figure 3). This benefits the households living near Arita, Cavi, Antofallita and Antofalla by reducing travel times to Tolar Grande from 3 to 1:10 hours and also leading to an increase in tourism. Mansfield Minera also installed signage along the roads of the region to warn tourists about the need to protect the environment, how to drive without leaving tracks, dangerous curves, and the presence of mining vehicular traffic. It also constructed the road from Arita to La Casualidad to establish east-west communication and close an adventure tourism road circuit. The data of the Arita camp's weather station are now available on the Internet for use in tourism planning.

Each year the company financially supports the Catholic pilgrimage from Tolar Grande and San Antonio de los Cobres to Salta "procesión Señor y la Virgen del Milagro"; in which all employees and management take part. Mansfield Minera is a permanent support member of the pilgrimage and of the Patron Saint's day of Tolar Grande on December 8. Mansfield Minera also supports and participates in the Pachamama festivities of the Colla indigenous people in town.

The company supplied the first aid post of Tolar Grande with inflatable splints for use in cases of

osteoarticular damage: fractures, sprains and dislocations, and to control haemorrhages. There is an ongoing relation with the schools as part of which Mansfield Minera provides transportation of teachers from Salta to Tolar Grande. Donations of clothing and shoes, school materials, a printer, computers, sports equipment and materials for other activities (e.g. dance) were made to schools in Tolar Grande and other municipalities such a San Antonio de los Cobres and Alfarcito. All donations were accompanied by visits of company personnel to meet with management and personnel of the organizations involved.

In 2008 Mansfield Minera worked with the Ophthalmological Foundation of Argentina and Pförtner, Poen and Bausch & Lomb optical laboratories to have the eyesight of everyone in Tolar Grande and environs tested. A number of people were found to need medical follow-up, and the company donated 50 pairs of glasses especially for children and seniors. A similar campaign was undertaken in San Antonio de los Cobres and surrounding area with the assistance of the Mining Secretariat of Salta, the hospital of San Antonio de los Cobres, and other member companies of the Salta Chamber of Mining

A townsperson thought that some companies probably make a greater contribution to the community than others, but that this is not known because contributions to institutions like the school and the hospital may not be publicized

The author had a conversation about CSR with a representative of a mining company that has been operating in the region closer to the provincial capital for many decades. They have undertaken a variety of projects over the years, always in cooperation with committees, never as the sole actor. Way back they began with basic necessities such as nutrition and then moved on to other areas as dictated by need (dining rooms, additions to the “vaso de leche (glass of milk)” program that is run by the state, school buildings and supplies, hospital, capacity building etcetera). Nutrition status has improved and the number of dining rooms has decreased - there is still one being run by the Catholic Church. The company always works in cooperation with the churches, NGOs, municipalities and the government and they **contribute** to projects, aiming for self-sufficiency.

7. Protect the Environment

Mansfield Minera and many other companies in the area carefully instruct their contractors to protect the environment, and an attitude of responsible environmental practices is taking hold. An example of this is an anecdote about a contractor emptying oil residues from a tanker truck in a ravine rather than disposing of it properly. An employee of a different company was passing by, saw what was happening and took a photograph that he sent to the President of the Chamber of Mines, which resulted in immediate corrective action by the company that had hired the contractor.

As mentioned earlier, the camp is kept meticulously clean and waste is properly managed.

The municipality carries out safety, environmental and food quality checks (“bromatología”) on companies, and an external stakeholder complained that the findings are not made public, which led someone else to comment that not publishing the information creates a risk of favouritism. The same person was also wondering if news reports about environmental damage, social unrest and murders related to mining are to be believed.

A professional working for a mining company closer to the city of Salta remarked that members of outlying communities are much less concerned about contamination than are the people living close to the mine. The reason may be that the much greater poverty in the remote regions

causes people to be only concerned about their immediate survival, i.e. the base of Maslow's pyramid of needs.

There was not sufficient time to discuss environmental practices in detail because of the particular focus of the present study.

8. Safeguard the Health and Safety of Workers and the Local Population

Because of the focus of the present study on relationships and the short time available, health and safety practices were not discussed in any detail. The most recent incident occurred in January 2011 when an employee suffered a 10 cm. cut in his arm because of inappropriate handling of a core cutter. The incident led to a review of the protocol for transporting injured staff to the city of Salta, and to adjustments of the comprehensive level of support the company provides to the family of the injured staff member. An external auditor is reviewing the company's office, field and camp safety and hygiene. The periodic inspections and resulting written reports are discussed with all employees.

Discussion

Relationships

Did relationships within the company play a role in how it positioned itself with respect to CSR?

The internal interviews and conversations suggest that the company has a flexible management style, trusts its employees and takes a "self-directed team" approach. It seems to make a real commitment to the well-being of its employees, who give the impression of being content and dedicated. Comments by both employees and management indicate that mutual respect and quality of relationships are highly valued. Therefore, building and maintaining relationships is a core characteristic of the company and as such undoubtedly influenced the way in which the company positioned itself with respect to CSR.

However, for this core competency to be successfully applied to CSR a few additional conditions need to be met. First, there has to be awareness about the meaning of CSR and its importance; second, a decision about becoming involved in CSR has to be made; and third, the modus operandi of the company has to match the requirements of CSR initiatives. Only when these three factors have been addressed by the company can it be said that it has a defined position with respect to CSR.

The author's observations indicate that Mansfield Minera as a collective was from the beginning of its operations fully aware of being a part of the surrounding society and of the associated responsibilities, and management consciously decided to embrace these responsibilities (in ongoing discussions with employees). Implementing CSR initiatives then became a natural extension of the value system operating within the company. While conscious decisions were made at some points, the entire process seems to have been quite informal and the approach grew organically. In addition, the gradual and cautious approach to developing the project provided ample time for the company and its stakeholders to develop mutual trust and work out a productive coexistence.

In summary, the author believes that the following were key factors:

- Leadership and values of principals and management
- Time and patience

- Natural talent of key players
- Management style
- Rootedness in the region

How significant are the relationships within and between actor groups (communities, NGOs, church, authorities, exploration team, etcetera) in the design and implementation of CSR initiatives?

While in the eyes of the company (management and employees) everyone is important and deserves respect, there appears to be a relative ranking with a more or less decreasing significance of relationships in the order:

- mayors of Tolar Grande and San Antonio de los Cobres
- Cacique of Tolar Grande
- Settlements close to the camp (e.g. Cavi oasis)
- Personnel of the medical post in Tolar Grande and the hospital in San Antonio de los Cobres
- Teachers of the schools
- Executive, judicial and legislative branches of the provincial government
- Members of religious orders
- Mining Union

However, this order is fluid and relationships change with circumstances. Also, stakeholders "low" on this list still receive much attention. Considerations other than relative power play a role, as evidenced by the great attention paid to the small and not very powerful household that lives in the Vega oasis. The great concern for the wellbeing of that single family (as, for example, evidenced by the instruction on the camp's whiteboard not to forget to deliver the weekly box of vegetables) could be seen as symbolizing company attitude.

The nature of relationships has an impact on whether or not CSR initiatives are undertaken. For example the nature of the relationship with the mayor of San Antonio de los Cobres made it impossible to conduct CSR initiatives in the municipality. The nature of the relationship with the person that will replace the current mayor appears to present an opportunity to convert the disadvantage (from a company perspective) of a levy into an advantage: capacity building that serves both community members and companies. The nature of the relationship between companies allowed the President of the Chamber of Mining to influence the CSR approach of a particular company. It seems reasonable to assume that the choice of Mansfield Minera's CSR priorities and their detailed implementation were influenced by the nature of the relationship between the parties involved. While the discussion of water supply infrastructure with the cacique during which the author was present suggested that this may indeed be the case, there was insufficient time to interview hospital and school staff about the details of how Mansfield Minera's CSR initiatives in health and education were developed.

Relating constructively with other actors is a complicated process in which many factors come into play. The company guidelines with respect to requests for support and contributions to the community (see page 15 and 16) illustrate some of this complexity. Developing and maintaining relationships is an art, not a science. This art depends very much on context and values, and as such cannot be learned from a book as an "objective truth". Paraphrasing Flyvbjerg: "analytical

rationality (likely to be found in manuals) can only lead to the lower levels in the performance of a skill, not to high-level performance. Proficient performers work more from their own experience-based perspective and make intuitive choices (albeit subjected to a rational check), while real experts behave in an intuitive, holistic and synchronic way. They are characterized by a flowing, effortless performance, unhindered by analytical deliberations"[13]. The director and the long-term employees of Mansfield Minera have become real experts in the art of relation-building through many years of dedicated effort and experience. A more in-depth study and comparison with in-depth studies of other cases would be required to support this hypothesis.

Mansfield Minera in the Context of e3Plus

It proved possible to relate the interviews and conversations in some detail to the e3Plus Principles for Responsible Exploration listed below:

1. **Adopt responsible governance and management**
2. **Apply ethical business practices**
3. **Respect human rights**
5. **Engage host communities and other affected and interested parties**
6. **Contribute to community development and social wellbeing**

While Mansfield Minera started its CSR effort many years before e3Plus was developed, and built its approach "from scratch", it turns out that in the above areas Mansfield Minera's approaches align remarkably well with the e3Plus Principles. Closer comparison with the on-line version of e3Plus may show that Mansfield Minera could benefit from borrowing certain details from e3Plus, while e3Plus may benefit from inclusion of Mansfield Minera's practices.

Mansfield Minera's approach has been largely informal and partly intuitive. This likely worked well because of its flexible management style, clearly articulated and lived values that have been effectively diffused throughout the company, small size and patience, and the considerable length of time available.

Their experience shows that it is possible for small companies to design and implement a CSR strategy without going broke when certain ingredients are in place. Of the ingredients mentioned in the previous paragraph and on page 21, only time may prove an insurmountable obstacle for many junior exploration companies. However, if investor attention to community relations keeps increasing at its current rate, taking the time for establishing productive relationships with communities and other stakeholders may become more acceptable and even expected.

Some aspects of Mansfield Minera's approach will be difficult to maintain when the project becomes a mine under any of the scenarios mentioned earlier (become the operator; find a partner to operate the mine; sell the project). As the number of employees increases and the construction and development phases get under way it will become more difficult to diffuse CSR values and approaches throughout the company, more formal structures and controls will be unavoidable, and the rapid changes associated with development will put greater strains on the relations with communities. Mansfield Minera is aware of these challenges.

[13] Flyvbjerg, B. (2001) "Making Social Science Matter – Why social inquiry fails and how it can succeed again. Cambridge University Press. p. 21

Interview Guide

Mansfield Minera Field Study, October 10-15, 2011

The answer to question 1 helps set the context for the answers to the questions that follow. Questions 2 and 3 are the research questions, and with each of these there is a list of possible questions the replies to which may help answer the research question. Of the possible questions, only those relevant to the particular interview situation were touched upon.

1. **Could you describe your daily duties?**
2. **Do relationships within a company play a role in how it positions itself with respect to CSR?**
    - **a.** How was the subject of CSR introduced into the company?
    - **b.** In which ways was CSR discussed (meetings; informally in the corridors; official and informal e-mail; video-conferencing)
    - **c.** Who were most intensely involved?
    - **d.** When was a firm go/no-go decision made?
    - **e.** Who were involved in making it?
    - **f.** What proportion of staff agreed with the decision?
    - **g.** How many were opposed or expressed concerns?
    - **h.** How was the "high-level CSR position" developed?
    - **i.** Who all provided suggestions for it?
    - **j.** What proportion of these suggestions was incorporated into the plan?
    - **k.** Was the position generally accepted?
3. **How significant are the relationships within and between actor groups (communities, NGOs, church, authorities, exploration team, etcetera) in the design and implementation of CSR initiatives?**
    a. Between actor groups
        i. Which groups are involved?
        ii. From your group's perspective, which other groups are most important?
        iii. What makes them important?
        iv. What are, in your eyes, the characteristics of a "good relationship"?
        v. What are, in your eyes, the characteristics of a "bad relationship"?
        vi. When is there no relationship?
        vii. With which groups does your group have good relationships? Bad relationships?
        viii. Have there been external factors that caused relationships to change?
        ix. Have the relationships changed with time? In which way?
        x. Have there been conflicts, were they resolved and if so, how?
        xi. What are your group's expectations of the other groups?

xii. How do you deal with the other groups (informally or formally, committees or other structures, frequency of meetings, frequency of e-mail exchanges, number and types of people who act as the interface)

xiii. Has your group affected CSR initiatives? If so, in which way? How did your group exert influence?

xiv. How do the people who represent your group receive instructions and share information and opinions within your group?

b. Within actor groups

i. How would you describe your group (size, internal organization, unity, leadership, history, and role)?

ii. How many times a year do you meet? Who calls the meetings?

iii. How was the most recent conflict within the group resolved?

iv. What are the expectations the group has of its members?

v. What expectations do members have of the group?

vi. What do members expect of each other?

vii. How many different subgroups could one identify?

viii. What makes one into a member of the group (shared ideals, shared community, shared resources, …)

ix. What do you receive from and give to other members?

x. Who are the most important people in the group?

xi. How does the group make decisions?

xii. With which group members do you talk more than once a week, and about what? How many times did you talk about CSR over the past three months? In which ways?

xiii. If your organization is hierarchical, how many times a month do you talk with each of the higher levels? How many of these conversations are about CSR?