Minor Works Construction Environmental Management Plan

We're working for Western Australia.

Lamb Creek Iron Ore Project – Great Northern Highway Intersection

January 2025

Mineral Resources Limited

Contents

FIGURES

TABLES

Amendments

Report Compilation & Review	Name and Position	Document Revision	Date
Authors:	Morgan Sejournee Environmental Scientist (AECOM)	Rev B	22 April 2022
Reviewer:	Linda Kirchner Technical Director (AECOM)	Rev B	22 April 2022
Reviewer:	Neil Smith Principal Environmental Advisor MinRes	Rev B	10 June 2022
Author:	James Pederick Principal Environmental Scientist	Rev 0	9 August 2022
Reviewer:	Kate Thomson Technical Director - Environment	Rev 0	9 August 2022
Author:	James Pederick Principal Environmental Scientist	Rev 1	8 September 2022
Reviewer:	Kate Thomson Technical Director - Environment	Rev 1	8 September 2022
Author:	James Pederick Principal Environmental Scientist	Rev 2	01 November 2022
Reviewer:	Alix Chinnery Principal Environmental Scientist	Rev 2	01 November 2022
Author:	Gefen Juran Graduate Environmental Scientist	Rev 3	30 May 2024
Reviewer:	Margaret Dunlop Principal Environmental Scientist	Rev 3	31 May 2024
Reviewer following client comment:	Margaret Dunlop Principal Environmental Scientist	Rev 4	5 July 2024
Reviewer:	Alix Chinnery Associate Director - Project Management, Environment WA	Rev 00	20 January 2025

1 PURPOSE

This Construction Environmental Management Plan (CEMP) contains the Main Roads' (the Principal) minimum environmental and heritage requirements for establishing, implementing and managing a CEMP for the works proposed for the Lamb Creek Iron Ore Project – Great Northern Highway Intersection.

Process Minerals International, a wholly owned subsidiary of Mineral Resources Limited, herein MinRes, (the Contractor) has completed this CEMP with details of how the Principal's management requirements and additional risks they have identified, shall be managed throughout the construction phase.

It shall be used as a reference for the Contractor, those working on the Contractor's behalf, environmental regulators and other parties with an interest in understanding Main Roads approach to environmental management on the Lamb Creek Iron Ore Project – Great Northern Highway Intersection.

2 PROJECT CONTEXT

2.1 Contractor Information

Construction works will be conducted by, or on behalf of, MinRes. MinRes implements an environmental management system (EMS) that is broadly based on the requirements of ISO 14001: Environmental Management Systems – Requirements with Guidance for Use. The EMS includes a corporate policy, environmental standards and procedures.

2.2 Project Description

Project Name: Lamb Creek Iron Ore Project – Great Northern Highway Intersection

Project Purpose:
The Project involves the construction of an intersection and acceleration and turning lanes to provide access into and out of the Lamb Creek Iron Ore Project (LCIOP) from the GNH. The works will ensure that truck operations entering and exiting GNH do not pose a safety risk to road traffic.

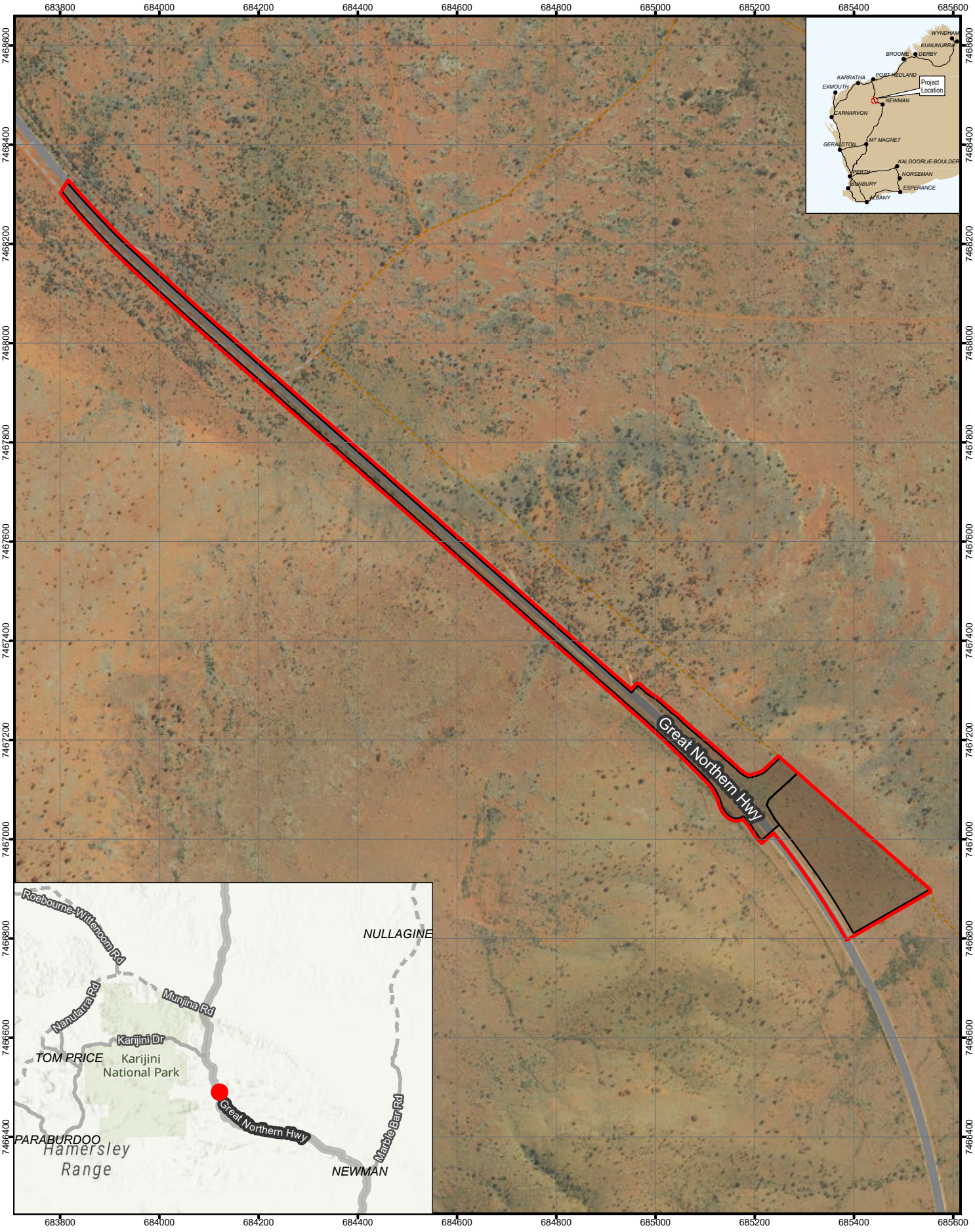
The proposed works are completely within the Main Roads Western Australia (MRWA) road reserve. Up to 8.6 ha of vegetation clearing is proposed for construction of the Project.

Project Components: The works will require the following:

- Installation of an intersection including acceleration and turning lanes along Great Northern Highway providing access into and out of the new Lamb Creek Iron Ore Mine.
- Upgrade of associated existing surface water drainage features.
- Construction compound south of the GNH intersection for material stockpiling, equipment park-up and other construction support services.

Project Location(s):
The Project lies within the Great Northern Highway (GNH) road reserve, located approximately 130 kilometres (km) by road northwest of Newman. The project is between approximately SLK 1292 and SLK 1295 in the Shire of East Pilbara local government authority.

The project area is shown in Figure 1.



PROJECT ID	60650191
CREATED BY	WYATTK2
APPROVED BY	J. PEDERICK
LAST MODIFIED	08 APR 2022

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Datum: GDA2020 MGA Zone 50

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metres

Data sources:
Base Data: (c) Based on information provided by and with the permission of the Western Australian Land Information Authority trading as Landgate (2010)
Service Layer Credits: World Topographic Map: Esri, HERE, Garmin, FAO, NOAA, USGS
WMS:
World Hillshade: Esri, USGS

LEGEND
- Indicative Footprint (IF)
- Development Envelope (DE)

Project Area

MINERAL RESOURCES LIMITED (MINRES)

LAMB CREEK IRON ORE PROJECT – GREAT NORTH HIGHWAY INTERSECTION, CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Figure
1

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3 LEADERSHIP

3.1 Leadership and Commitment

A MinRes Environmental Representative (ER) will be the Contractor's Representative for Lamb Creek Iron Ore Project – Great Northern Highway Intersection. This Environmental Representative shall be responsible for:

a) taking accountability for the effectiveness of the CEMP

b) ensuring the integration of the CEMP into the project planning

c) ensuring that the resources required for the implementation of the CEMP are available

d) communicating the importance of effective environmental management and conforming to the CEMP requirements

e) ensuring that the CEMP achieves its intended outcomes

f) directing and supporting persons to contribute to the effectiveness of the CEMP

g) promoting continual improvement in environmental management throughout the length of the Contract

h) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility

3.2 Environmental Policy

MinRes' Environmental Policy outlines MinRes' commitment to environmental management principles and objectives that provide the overall intentions and direction of the organisation. MinRes' Environmental Policy is attached as Appendix 1.

All MinRes staff and personnel working on behalf of MinRes shall be aware of the Policy, its purpose and their role in achieving the commitments, including how their work can affect MinRes' ability to fulfil its compliance obligations.

3.3 Contract Roles and Environmental Responsibilities

A description of the roles and responsibilities for works under this Contract are provided at Table 1.

Table 1 Contract Roles and Environmental Responsibilities

Role	Responsibility
Environmental Representative (MinRes)	• Responsible for environmental management and control of all activities relating to the execution of the work including work undertaken by subcontractors.
Sub-Contractor TBD	• Comply with the approved CEMP and the maintenance of records to demonstrate subcontractor compliance

4 PLANNING

4.1 Project Development Planning

In planning for this project MinRes established the following plans to address compliance and other obligations:

- Lamb Creek Iron Ore Project – Great Northern Highway Intersection - Clearing Assessment Report; and
- Lamb Creek Iron Ore Project – Great Northern Highway Intersection - Environmental Impact Assessment.

The Compliance Obligations from these documents have been documented in this CEMP and Environmental Operational Controls to manage these obligations are listed in Table 3.

Construction Planning
The following items were used to identify the Risk and Opportunities related to this CEMP:

- Compliance obligations;
- Main Roads Specification 204B Maintenance Works – Environmental Management;
- Main Roads Supplements to Austroads Guide to Road Design;
- Items identified in Section 2.2 and 2.3 of this CEMP;
- Environmental Risks associated with construction activities; and
- Lamb Creek Iron Ore Project – Great Northern Highway Intersection -Environmental Impact Assessment.

The Risks and Opportunities identified were assessed for the likelihood and consequence of events occurring during the construction period in accordance with the Contractors Risk Assessment process and are documented in Table 2.

If additional significant environmental aspects, compliance obligations and commitments are identified in the Risks and Opportunities Register, these 'Risk Treatments' shall be added to Table 2 as an Operational Control.

Table 2 Construction Environmental Risks and Opportunities

Construction Activity / Process / Product	Risks and Opportunities	Rating	Risk Treatment Management Action	Residual Rating	Monitoring	Responsibility
Clearing	Loss of well represented vegetation communities and flora species	Low	• Vegetation clearing minimised • Clearing only conducted within approved areas • Clearing areas demarcated prior to clearing	Low	Weekly inspections	Construction Supervisor
Clearing	Loss of conservation significant fauna	Low	• Fauna habitat clearing minimised • Clearing only conducted within approved areas • Clearing areas demarcated prior to clearing • Native fauna will not be fed or intentionally harmed. • No pets or firearms will be permitted on site.	Low	Weekly inspections	Construction Supervisor
Clearing	Reduced health or loss of vegetation from dust emissions	Low	• Fugitive dust controlled using dust suppression (e.g. using water carts) where required	Low	Weekly inspections	Construction Supervisor
Clearing	Introduction or spread of weeds	Moderate	• Vehicle hygiene procedures and daily pre-start checks	Low	Vehicle and Plant hygiene checklists	Construction Supervisor
Clearing	Loss of topsoils	Moderate	• Topsoils to be removed, stockpiled and signposted for future rehabilitation	Low	Weekly	Construction Supervisor
Clearing	Fire	High	• No clearing during catastrophic fire danger conditions • Water carts to be available on site for use in fire prevention (e.g. watering down areas) or firefighting • Spotters in place able to identify any fire/smouldering of vegetation • Risk of fire to be included in clearing JHA • Smoking will only be permitted in designated areas, which shall be appropriately signed and contain self-arresting cigarette butt disposal containers • All plant, vehicles and machinery will be fitted with fire extinguishers	Moderate	Constantly during clearing operations	Construction Supervisor
Machinery movements	Dust generation impact to vegetation health	Low	• Dust suppression using water trucks; • Dust generating activities avoided during unfavourable weather conditions.	Low	Weekly inspections	Construction Supervisor

Construction Activity / Process / Product	Risks and Opportunities	Rating	Risk Treatment Management Action	Residual Rating	Monitoring	Responsibility
Machinery movements	Fire	High	• No machine movements during catastrophic fire danger conditions • Water carts to be available on site for use in fire prevention (e.g. watering down areas) or firefighting • Spotters in place able to identify any fire/smouldering of vegetation • Risk of fire to be included in clearing JHA • Smoking will only be permitted in designated areas, which shall be appropriately signed and contain self-arresting cigarette butt disposal containers • All machinery to be checked daily for build-up of vegetation in moving parts.	Moderate	Constantly during clearing operations	Construction supervisor
Erosion and sedimentation	Loss of topsoil and impact to waterways	Low	• Infrastructure used to maintain surface drainage patterns, if required (e.g. culverts, diversions) • Sediment traps used to minimise sedimentation offsite, if required • Silt fences may be installed around stockpiled materials if erosion and sediment movement is observed • Construction during rainfall avoided where practicable.	Low	Weekly inspections	Construction Supervisor
Spills	Environmental pollution	Low	• Spill trays and spill response equipment will be available near a designated refuelling area • All fuel stored on site is to be contained within a secure bund or other facility (temporary). No bulk fuel and oil will be stored at the site. Refuelling will be carried out by direct transfer daily. • All spills to be reported and contaminated soils to be removed of and disposed of in accordance with MinRes waste management plan.	Low	Weekly inspections	Construction Supervisor

5 ENVIRONMENTAL SUPPORT

5.1 Resources

The **Environmental Representative** (ER) will be responsible for compliance with this CEMP.

The Contractor's nominated ER shall have the authority to direct their responsibilities to an onsite delegate for short periods, which is to be agreed upon by both parties. This shall be undertaken only on a risk based approach (i.e. if the activity has a high environmental risk, the ER shall be on site at all times).

5.2 Training and Competency

MinRes have ensured that all personnel (including subcontractors) carrying out works under its control, which affects its environmental performance and ability to fulfil its compliance obligations are competent (on the basis of education, training or experience) by:

- Ensuring all personnel and contractors have completed inductions prior to commencing works; and
- Recording the completion of relevant training in a training register.

MinRes will retain the appropriate documented information as evidence of compliance with the CEMP.

5.2.1 Site Induction Training

MinRes has developed a Site-specific Induction training program that includes as a minimum:

- awareness of the importance of conformance with the environmental policy;
- awareness of importance of conformance with the approved CEMP;
- roles and responsibilities;
- the significant environmental impacts, actual or potential, of work activities associated with the works;
- the potential consequences of departure from specified operating procedures; and
- the environmental benefits of improved personal performance.

MinRes shall conduct this Site-specific Environmental induction training for all personnel, the Superintendent and its agents, and all visitors not escorted on Site by inducted persons.

All persons undertaking the Site induction training will be assessed to confirm their understanding of the Environmental requirements of the site and records of the inductions maintained.

Continual feedback will be provided to the ER on all training conducted by all contractors, sub-contractors and visitors during implementation of the clearing.

5.3 Consultation and Communication

5.3.1 Internal Communication

MinRes has the following procedures for ensuring internal communication of environmental information to personnel:

- daily pre-start meetings;
- weekly toolbox meetings; and
- weekly contractor meetings.

5.3.2 External Communication

All external communications to regulators are to be conducted by MinRes Environment Representatives, with copies of relevant correspondence provided to MRWA if requested. Key contact is Carl Paton (Senior Environmental Advisor).

5.4 Documentation

5.4.1 Document and Data Control

This plan will be controlled under the MinRes Document Control System for the duration of the Works.

The controlled CEMP and associated contract environmental documentation once established, will be implemented and maintained on Site during construction.

If the CEMP or associated environmental documentation is required to be amended, it shall be sent via email to Main Roads Superintendent. MinRes shall review the CEMP and submit amendments, if needed, to the Main Roads Superintendent for approval within one (1) week if the following events occur:

- detecting a non-conformance;
- the Contractor's practice no longer reflecting the approved CEMP; or
- an environmental incident occurs.

5.4.2 General

The references and related documents (procedures, processes, work practices and information required) to this CEMP are documented in Section 10.

The CEMP and associated referenced documents will be physically located at the site construction office. The CEMP will be electronically available by request via email at Carl.Paton@mrl.com.au.

6 OPERATION

6.1 Construction Environmental Operational Controls

MinRes is required to establish, implement, control and maintain the processes needed to meet the Obligations identified by Main Roads and those additional Risks and Opportunities identified by MinRes. These controls will be documented in the Environmental Management Control column in Table 3.

MinRes shall also ensure these control measures are evaluated and amended as required.

Table 3 Construction Environmental Operational Controls

Aspect	Ref No.	Principal Environmental Management Requirement	Hold Point (Y/N)	Contractor Operational Control	Responsibility
Induction and Pre-Start Requirements	204B.20	N/A	N	• Environmental and heritage requirements included in the site induction and pre-starts	MinRes Construction Supervisor
Aboriginal Heritage	204B.1	N/A	N	• If Aboriginal heritage items or items suspected of being Aboriginal heritage items are uncovered during earthworks associated with the Project, work will be halted immediately, and the area demarcated to ensure they are protected until area inspected by a Heritage advisor for confirmation or otherwise. • Site Induction to include Aboriginal Heritage Requirements	MinRes Construction Supervisor
Clearing	204B.4 & Spec 301	N/A	N	• Demarcate clearing boundaries prior to clearing • Clearing activities managed to ensure machinery stays within the approved clearing area. • Before clearing, Priority flora in the immediate surrounds of the Development Envelope to be retained shall be flagged with a 5 m exclusion zone, where practicable • Pre-Starts to detail the approved clearing areas and what environmental values they contain.	MinRes Construction Supervisor
Dust	204B.11	N/A	N	• Dust suppression using water trucks implemented to prevent excessive fugitive dust, if required • Dust generating activities shall be minimised during unfavourable weather conditions as far as practicable	MinRes Construction Supervisor
Erosion and Sedimentation	204B.13	N/A	N	• Infrastructure used to maintain surface drainage patterns, if required (e.g. culverts, diversions) • Sediment traps used to minimise sedimentation offsite, if required • Construction during rainfall avoided where practicable.	MinRes Construction Supervisor
European Heritage	204B.14	N/A	N	• Conduct a Dial Before You Dig prior to clearing • Site Induction to include European Heritage Requirements • If European heritage items or items suspected of being European heritage items are uncovered during earthworks associated with the project, work will be halted immediately, and the area demarcated to ensure they are protected until area inspected by a Heritage advisor for confirmation or otherwise.	MinRes Construction Supervisor
Fauna	204B.15	N/A	N	• Clearing will be done as a front, allowing animals to move across the Development Envelope and relocate to other areas.	MinRes Construction Supervisor
Hazardous Material and Spills	204B.19	N/A	N	• Hazardous materials stored and handled in accordance with MinRes' Hydrocarbon and Chemical Procedure. • All hydrocarbon spills will be recorded as environmental incidents (see Section 7.1.2) • MinRes will notify the Main Roads Superintendent's Representative/ Supervisor within 24 hours if any spill occurs on the site • All spills remediated prior to completion of works • Any soil contaminated by accidental fuel, oil or chemical spills, will be removed from the site and disposed of at an approved location • MinRes will be responsible for the appropriate storage, management and disposal of waste and hazardous materials.	MinRes Construction Supervisor
Noise	204B.23	N/A	N	• Meet requirements of the Local Government Area in respect to noise management and construction working hours (noting the nearest residence is approximately 9 km to the west)	MinRes Construction Supervisor
Recording and Reporting	N/A	N/A	N	• A hygiene inspection checklist will be used to record the results of hygiene inspections (MinRes, Weed Hygiene Certificate – MRL-EN-FRM-0004) • Weekly inspections will be conducted to assess compliance with the CEMP during operations • A practical completion inspection will be conducted to assess compliance after completion of clearing • Results of CEMP inspections will be recorded using an inspection checklist	MinRes Construction Supervisor
Topsoil and Stockpiles	204B.36	N/A	N	• Soil, vegetation and mulch to be located away from surface water sources • Soil, vegetation and mulch to be stockpiled separately • Topsoil to be retained for rehabilitation at nearby stockpiles, where practicable	MinRes Construction Supervisor
Waste	204B.39	N/A	N	• No waste to remain at the site at completion • Waste to be disposed of offsite at a suitably licenced facility.	MinRes Construction Supervisor
Water Drainage	204B.41	N/A	N	• Infrastructure used to maintain surface drainage patterns, if required (e.g. culverts, diversions)	MinRes Construction Supervisor
Weeds	204B.43	N/A	N	• Weed hygiene inspections conducted for all vehicles and ground-engaging machinery prior to entry and exit of site	MinRes Construction Supervisor

6.2 Emergency Preparedness and Response

MinRes' Emergency Response Plan and Emergency Procedures are within the MinRes EMS.

The Emergency Response Plan has taken into account the following requirements:

- Prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations;
- Respond to actual emergency situations;
- Take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;
- Periodically test the planned response actions, where practicable;
- Periodically review and revise the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests; and
- Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control.

The Emergency Response Plan also provides a list of the:

- Nominated key personnel for the associated emergency situation with their contact details;
- Contact details of the emergency service providers;
- Relevant Main Roads Organisation personnel; and
- Resources required to respond to environmental emergencies.

The Site Induction Program addresses the identified issues in the Emergency Response Plan to ensure that all site personnel are aware of procedures in the event of an incident or emergency occurring.

6.3 Environmental Incident Management

6.3.1 Environmental Incident Notification and Investigation

MinRes shall submit all environmental incidents in accordance with Main Roads Environment Incident Management Guideline and using Main Roads Environment Incident Report Form located on Main Roads' website, internet address: https://www.mainroads.wa.gov.au.

MinRes shall submit the completed Main Roads Environment Incident Reporting Form to the Superintendent within 5 days of an insignificant or minor incident occurring and provide copies of all reports and information associated with the incident to the Superintendent. For moderate, major and catastrophic incidents, this shall be completed within 24 hours of the incident becoming known to the incident reporter.

For the duration of the works the ER will be responsible for the Environmental Incident Management Process.

7 MEASUREMENT AND PERFORMANCE EVALUATION

7.1 Monitoring, Measurement, Analysis and Evaluation

7.1.1 General

MinRes shall establish, implement and maintain detailed procedures, for the monitoring and measurement of environmental practices that can have a significant impact on the environment on a regular basis, which are detailed below.

MinRes identified the following items that require monitoring and measuring:

- Amount of clearing, dates of clearing and a shapefile of the clearing area;
- Inspection results (measuring compliance against CEMP); and
- Community complaints relating to the environment performance during clearing.

The following methods shall be used for monitoring, measuring, analysing and evaluating:

- Recording of dates clearing is conducted;
- Weekly inspections;
- Environmental Incidents Register;
- Survey of clearing area at completion;
- Practical completion inspection.

The Criteria to be used to evaluate the project environmental performance shall be:

- All clearing within approved areas;
- Number of environmental incidents;
- Number of Non-Conformances with CEMP; and
- Amount of community complaints.

7.1.2 Records and Records Management

The control of records shall be in accordance with the MinRes EMS.

7.1.3 Environmental Audit

MinRes shall undertake a minimum of one environmental compliance audit within 1 month of construction commencement. For each audit conducted, a report shall be produced and shall detail the:

- Scope of the audit;
- Audit questions; and
- Audit findings.

7.1.4 Corrective and Preventative Action

If there is non-compliance, the non-compliance will be investigated in accordance with MinRes' EMS. All evidence of compliance evaluation will be recorded in the MinRes incident register, which is kept on file at the Site Construction office.

7.2 CEMP REVIEW

If a non-conformance or incident occurs, MinRes shall undertake a review of the CEMP and, if needed, submit suitable amendments to Main Roads for approval.

8 DEFINITIONS

Term	Definition
Construction Supervisor	Contractor's Construction Supervisor
ER	Environmental Representative (MinRes)
EMS	Environmental Management System
Environment	Surrounds in which an organisation operates, including air, water, land, natural resources, flora, fauna and their relationships.
Environmental Aspect	Element of an organisation's activities or products or services that interacts or can interact with the environment. An Environmental Aspect can cause an Environmental Impact. A significant environmental aspect is one that has or can have one or more significant environmental impact.
Environmental Impact	Change to the Environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
MGA	Map Grid of Australia
MRWA	Main Roads Western Australia
Project	Refers to only the construction activities associated with the Great Northern Highway Intersection.
Risk	Effect of uncertainty Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood (as defined in ISO Guide 73:2009, 3.6.1.1) of occurrence.
Risks and Opportunities	Potential adverse effects (threats) and potential beneficial effects (opportunities).
Top Management	A person or group of people who directs and controls the CEMP at the highest level.

9 REFERENCES AND RELATED DOCUMENTS

Document Number	Description
	International Standard ISO 14001 Environmental Management Systems – Requirements with Guidance for Use (2015)
	Main Roads Specification 204 Environmental Management – Maintenance Works
	Rapallo Environmental. (2021). Detailed flora and vegetation survey of the Great Northern Highway intersection – Lamb Creek Project. Unpublished report prepared for Mineral Resources Limited.
	Rapallo Environmental. (2022a). Targeted conservation significant flora survey of the Lamb Creek project area. Unpublished report prepared for Mineral Resources Limited.
	Rapallo Environmental. (2022b). Detailed vertebrate fauna survey of the Lamb Creek project. Unpublished report prepared for Mineral Resources Limited.
MRL-EN-FRM-0004	Weed Hygiene Certificate
	Umwelt (Australia) Pty Limited. (2022a). Lamb Creek Project - Flora and Vegetation Impact Assessment. Unpublished report prepared for Mineral Resources Limited.
	Umwelt (Australia) Pty Limited. (2022b). Lamb Creek Project – Detailed and Targeted Flora and Vegetation Survey. Unpublished report prepared for Mineral Resources Limited.

10 APPENDICES

Appendix	Title
Appendix 1	MinRes Environmental Policy

Appendix 1: MinRes Environmental Policy

MINERAL RESOURCES

ENVIRONMENT POLICY

PURPOSE

As a leading Australian mining services, contracting and resource development company, Mineral Resources Limited (MinRes) is committed to environmental management that maintains our licence to operate in an environmentally responsible and sustainable manner.

SCOPE

This Policy applies to all MinRes Stakeholders, defined for this purpose as employees (including contractors and consultants) and Directors for all entities within the MinRes Group.

OUR COMMITMENT

MinRes commits to:

- Comply with all applicable legislation, standards, compliance obligations and codes of practice.
- Develop, implement, and continually improve environmental management systems that enable MinRes to identify and manage environmental risks and opportunities at all stages of our operations.
- Measure and continuously improve our environmental performance through setting environmental objectives, performance measures and performance targets.
- Minimise the adverse environmental impacts associated with our operations and where possible protect the environment through the efficient use of natural resources such as energy and water; prevention of pollution; minimisation of dust, air quality and operational GHG emissions; and the responsible management of land and biodiversity.
- Continually improve practices to preserve key ecosystem functioning in the areas in which we operate.
- Minimise risks to human health, safety, the environment and communities through effective waste management practices.
- Continually improve practices to manage the safe operation and closure of tailings storage facilities.
- Integrate rehabilitation and closure considerations throughout all stages of our activities to transition to closure effectively.
- Implement environmental initiatives and encourage the development of environmental technologies that contribute to greater environmental responsibility.
- Commit resources to comply with this Policy and to manage and monitor our environmental performance.
- Understand and consider the expectations of all stakeholders in our operations for diligent environmental management.
- Report our Environmental performance to stakeholders in a transparent, timely and regular manner.

OUR GOALS

We will support the precautionary principle[1] and ensure we cause no environmental harm beyond that which is necessary to conduct our businesses and for which statutory approval has been received.

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[1] According to Principle 15 of the 1992 Rio Declaration, the precautionary approach indicates that "where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation". https://www.gdrc.org/u-gov/precaution-7.html.

OUR RESPONSIBILITY

Every employee has a personal responsibility to maintain a high level of environmental awareness and to comply with the principles of this Policy and any associated policies, procedures, or processes.

Leaders at all levels in the group are required to communicate this Policy to all Stakeholders and involve them in its ongoing enforcement.

RELATED DOCUMENTS

Climate Change Policy
Community Policy
Health and Safety Policy
Human Rights Policy
Responsible Production Policy
Sustainability Policy
Tailings Storage Facility Policy
Whistleblower Policy

REVIEW OF POLICY

This policy will be reviewed, revised, and re-published where necessary to ensure that it remains relevant and appropriate to MinRes' activities.

Derek Oelofse
Group Financial Controller and Company Secretary
29 June 2023