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INTRODUCTION

This document is designed to provide the various areas within St Ives Gold Mine (SIGM) with prescriptive guidance on how the goals described within SIGM-GEN-PY001 - Environment Policy, SIGM-GEN-PY002 – Health and Safety Policy and SIGM-GEN-PY003 - Community Policy can be achieved.

SCOPE

The scope of this EHSMS is applicable to all SIGM health, safety and environmental activities undertaken by all employees, contractors/suppliers, visitors and Business Partners. This will apply where SIGM has control or can have influence on those activities.

The EHSMS Framework

This document is reviewed by the EHS department on an annual basis following management review unless directed otherwise.

EHS Management Standards

The SIGM-GEN-PY001 - Environment Policy, SIGM-GEN-PY002 - Health and Safety Policy, and SIGM-GEN-PY003 - Community Policy Policies alone will not deliver best practice EHS outcomes, these management standards have been prepared. These standards aim to
define the systems and practices required to deliver the performance expected in areas and to demonstrate compliance with OHSAS 18001:2007 and ISO14001:2004. Their content has been determined by consideration of the current statutory requirements, identified external best practice and internal continuous improvement.

The EHS Management Standards have been designed to ensure effective and consistent EHS Management at each SIGM area and define the minimum requirements for EHS that must be adhered to. All SIGM areas must therefore have in place an Area EHS Compliance Schedule which meets the requirements of the EHS Management System Standards.

Adherence to this standard will ensure that all areas within SIGM control effectively implement the Health and Safety, Environmental and Community Policies.

**Structure of the EHS Management Standards**

Each Standard consists of two sections as follows:

- **Intent** Outlines the major objectives of the Standard.
- **Guidance Notes** Outline the practices and where necessary documentation systems required demonstrating compliance to the Standard.

**Area EHS Compliance Schedules**

Each area is required to implement Area EHS Compliance Schedules to demonstrate compliance. Guidance on the specific requirements expected is defined within these standards, and associated documentation.

**Operational Control/Training**

Through the above framework, each area should have a clear link from its internal EHS activities through to the SIG-GEN-PY001 - Environment Policy, SIG-GEN-PY002 – Health and Safety Policy, SIG-GEN-PY003 - Community Policy.

To ensure the effectiveness of this process each area will be subject to management audits and system reviews. Each area will develop business plans annually, incorporating controls of identified risks that are linked to objectives and targets, other operational controls are managed by use of controlled documents. Each area will develop a training plan on an annual basis; the training plan shall encompass training needs analysis, schedule of training and evidence of attendance.
EHS MANAGEMENT SYSTEM STANDARDS

1. Policy, Leadership and Commitment

Intent

SIGM to meet this standard requirement have Environment, Community and Health & safety Policies that demonstrate top management commitment to improving EHS performance.

Senior management and supervisors, by means of their actions, attitude, consistency and behaviors provide a visible, pro-active and demonstrated commitment to EHS activities, so as to sustain a culture of commitment to improving EHS performance.

Guidance Notes

Policy

The below documents shall be displayed on the intranet, at various locations throughout the SIGM Site and communicated to all employees, Business partners at the Lease Induction.

SIG-GEN-PY001 – Environment Policy
SIG-GEN-PY002 – Health and Safety Policy
SIG-GEN-PY003 – Community Policy

Business partners

Commitment

The General Manager and all Department Managers shall ensure that they review the Health and Safety Policy, Environmental Policy and the Community Policy on an annual basis and sign off on these policies. This will occur at the Annual Management Review Meeting. The review process considers and ensures:

Relevance to current issues, impacts and business planning requirements, including safety and environmental performance.

Commitment to continual improvement;

Commitment to decreasing injuries and incidents;

Commitment to minimization of pollution;

Commitment to compliance with legal and other requirements that SIGM subscribe to; and

Minimise Liability.

All employees and Business partners shall demonstrate their commitment by actively participating in EHS activities.

Leadership

Management are to actively promote the Health and Safety, Environment and Community Policy at least yearly, or in the event of a policy change.
The Manager - Employee Relations is accountable for ensuring that procedures for employee recruitment, appointment and continued fitness for work include EHS requirements. The Manager - Employee Relations or delegate is accountable for ensuring that EHS procedures are implemented and maintained. This accountability also includes EHS performance reporting eg annual management review.

Outcomes/Records:
Current H&S, Environment, Community policies, management review minutes and relevant current position descriptions.
2. Risk and Opportunity

Intent

SIGM requires employees and business partners to ensure that hazards to activities, people, equipment or Environment are identified, risks are assessed and the appropriate control measures are implemented. **Hazards in this context imply significant aspects/impacts identified in SIGM Environmental activities.**

Guidance Notes

General

The following documents have been developed for the management of EHS Risks

- SIG-EHS-PR005 – *Risk Management Tools Procedure*

Any proposed EHS change to work environment e.g. new operations/equipment/activities shall be subjected to a risk review prior to work being undertaken.

Risk Identification and Assessment

Risk at SIGM mine are identified via the following processes.

- Hazard / incident reporting internal / external
- Risk assessment
- Job Hazard analysis
- Investigation findings

Assessment

All risk management activities on site are conducted in accordance with SIG-EHS-PR005 – Risk Management Tools Procedure and using SIG-EHS-TMP001 Risk Assessment template.

Where new risks may be introduced, those risks shall be assessed and as required added to area risk register.

Health and Safety, Environment and Community Risk Registers are maintained at area levels, thereby ensuring that ownership rests with the relevant area managers as applicable to the activities under their control.

It is the Area/Department Managers’ responsibility to ensure the Site Risk registers are maintained and kept current. High risk information from these registers are normally an input to the business plans objectives and targets.
Risk Management

Outcomes/Records:

Risk assessments, risk registers per area.
3. Legal and Other Requirements

Intent

That SIGM and Business partners will comply with all laws, regulations, standards, codes, statutory licenses and other legislative requirements which apply to their operations, and exercise a duty of care with respect to personnel, environment and the communities in which they operate. Other requirements means such documents as (but not limited to) the International Cyanide Management Code and Gold Fields Safe Production Rules.

Guidance Notes

Identifying Legal Requirements

Identification of EHS legal and other requirements are outsourced to subject mater experts and records of this data is located on the SIGM intranet in “insight online menu.” This information is keep current by the outsourced organization and any relevant changes are communicated by email.

The following documents have been developed for the management of statutory appointments
Additional tools for identifying legal and other requirements are:

WA State Law Publisher.

LAWLEX Alerts & LAWLEX Environmental & Safety newsfeeds (via SAI Global).


Goldfields Environmental Forum (GEF).

Direct Regulatory Authority liaison with agencies such as the WA Department of Environment and Conservation (DEC), WA Department of Mines and Petroleum (DPM), WA Environmental Protection Authority (EPA), and WA Department of Consumer and Employment Protection (DoCEP).

**Implementation of Legal & Other Requirements**

It is the responsibility of area management that appointments are made for their area of responsibility in line with SIG-EHS-PRO007 – Appointed Persons and Area Accountabilities Procedure and records of these appointments are located in the mine record book or a file along side of the mine record book. It is the accountability of the General Manager to ensure this process is signed off.

SIG-ENV-RG005- Environmental Legal Register is a register that contains a list of all relevant environmental legislation, codes and environmental permits (and may include direction to the operating license, Ministerial Statement, Groundwater Abstraction licenses, Works Approvals and other Statutory Approvals) as required to be maintained by the Environmental Department.

SIG-OHS-RG005 – OHS licenses Register is a register that contains a list of explosives, dangerous goods and poisons licenses and is maintained by the site Hazardous Materials Coordinator.

Dangerous Goods & Explosives license renewals are sent out yearly by the Department of Consumer and Employment Protection (Resources Safety Division) to the Health and Safety Department. The Hazardous Materials Coordinator is responsible for their renewal.

Poisons Permit renewals are sent out yearly or three yearly by the Health Department to the Area Manager. The Area Manager is responsible for their renewal, in consultation with the OHS Department.

The Certificate of Registration of Premises in which radioactive substances are to be used, stored or manufactured is maintained by the registered Radiation Safety Officer on site. The Radiation Safety Officer on site has been formally appointed in accordance with SIG-EHS-PRO007 – Appointed Persons and Area Accountabilities Procedure, and is registered as a licensed radiation officer with the Radiological Council.
SIMG has Certificates of Registration for in-house electrical installation work. SIMG electrical personnel have been formally appointed in accordance with SIG-EHS-PRO007 – Appointed Persons and Area Accountabilities Procedure, and are registered as a licensed electrical officer with the Department of Consumer and Employment Protection.

All new facilities or changes to existing facilities that have the capacity to affect the Dangerous Goods, Explosives or Poisons Licenses on site are required to be approved by a DoCEP approved consultant in consultation with the Health and Safety Department prior to any changes taking place.

Education & Communication

SIMG web page has links to the web sites of the Australian Standards, DMP, DoCEP DEC, Chamber of Minerals and Energy, EPA and WA State Law Publisher, which gives SIMG Personnel and Business Partners access to applicable, current WA legislation.

EHS Legal Requirements are communicated:

- at management meetings and formal information sessions;
- by email and memoranda, eg weekly EHS themes;
- at Annual EHS Management Review Meetings;
- at Quarterly EHS review meetings;
- via the intranet (Legal Register);
- by distribution of documents;
- letters of appointment, and current Position Descriptions.

Legal and other requirements (e.g. Duty of Care) are communicated to new and transferred employees during site/area inductions.

Department Managers are responsible for maintaining awareness of legal and other requirements within their departments/areas. They shall also ensure that where they are made aware of changes to the legal requirements that they inform and advise those persons within their departments/areas of the changes may affect them.

Evaluating compliance with Legislation and Other Requirements.

The following processes are used at SIMG to periodically evaluate compliance with relevant EHS legislation and other requirements:

- Internal EHS system audits and Inspections,
- Submission of the Annual Environment Reports required by DMP and DEC in accordance with site operating licence and the Mining Act.
- Areas are required to evaluate their compliance to the existing Dangerous Goods, Explosives & Poisons licenses through their planned inspections.
Compliance with the Groundwater Abstraction Licences are monitored annually by a Groundwater Monitoring Summary, and triennially through an Aquifer Review.

Compliance with Ministerial Statement 548 is undertaken through the Annual Environmental Management Plan for Gold Mine Developments on Lake Lefroy (and is subject to third party review).

Requirements under the Energy Efficiencies Opportunities Act are reported through the Assessment Schedule and NPI/NGERS frameworks.

Site Objectives and targets that are set annually and reviewed annually for safety and environmental performance.

Area Objectives and targets that are set annually and reviewed quarterly for safety and environmental performance.

**Outcomes/Records:**

Appointed persons documentation, position descriptions, Environmental Health Safety Legal Register, OHS Licenses Register, and relevant Environmental reports to Government departments as listed above.
4. Objectives, Targets, Plans and Key Performance Indicators.

Intent

SIGM will establish EHS Objectives and Targets to meet the EHS policies, these objectives are the overall goals for EHS performance. Objectives and targets will be set at each area level annually as a component of the area business plan.

Objectives shall be aimed at improvements of the EHS improvement performance and supported by targets which are clear, quantifiable, and realistic and time bound.

To implement effectively and efficiently objectives and targets: the areas will develop and maintain action plans that will designate persons responsible, time frame for completion, resources required and progress checks of status.

To monitor the above Objectives and targets will be reviewed quarterly through EHS meetings.

Key Performance indicators will be set against SIGM, Area and Business partner. Contractual KPI’s will additionally be set for Business partners.

Guidance Notes

Setting Objectives and Targets

When setting objectives and targets the following criteria will be considered.

- Legal and other requirements – (e.g. refer to EHS legal register)
- Risk register - (e.g. refer to H&S and Environment and Community registers)
- Operational requirements – (e.g. EHS, CHS, EPS standards)
- Stake Holders – (e.g. Community, Regulatory, Parent company)
- Business requirements –(e.g. Contractual requirements with business partners)
- Technological –(e.g. best available technology or new technology)
- Financial –(e.g. Return on investment)

The SIGM Operational Plan is a one year rolling plan which sets objectives and targets for the financial year ahead. The Plan is reviewed and approved by the General Manager.

From this business plans are set annually these Business Plans are utilized by key areas (as defined by the Organization Structure) to identify key operational, Health and Safety and Environmental objectives and targets.

When objectives and targets are set, (including those set for Business partners): measurable key performance indicators (KPIs) shall be set to provide information on progress towards meeting objectives and targets. Area Management is responsible for ensuring objectives, targets and schedules are communicated to relevant SIGM Personnel and Business Partners.
The Environment & OHS Departments are responsible for coordinating Quarterly EHS Management Review meetings involving the General Manager and other Senior Management to review area objectives and targets. Progress against objectives and targets is reviewed on a quarterly basis at the Quarterly EHS Management Review Meeting. Business partners will have additional set of KPI’s through contract with SIGM that is monitored through the compliance audit schedule.

**Outcomes/Records:**

SIGM current Operational plan, site business plan, area(s) business plans, area(s) action plans, Business partner(s) contractual KPI’s, current area EHS compliance schedules, and minutes of quarterly EHS Management reviews.

**5. Operational Control**

**Intent**

To ensure that all SIGM areas maintain effective control over their significant EHS risks and opportunities, meets legal and policy requirements, and meet community and other relevant expectations.
Guidance Notes

General

EHS operational control documentation has been captured in the following forms of documentation on site:

<table>
<thead>
<tr>
<th>Policies</th>
<th>Standards</th>
<th>Guidelines</th>
<th>Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Procedures &amp; JHA’s.</td>
<td>Manuals &amp; Training</td>
<td>Work Instructions</td>
<td>Reports</td>
</tr>
<tr>
<td>Forms &amp; Templates</td>
<td>Registers</td>
<td>Position Descriptions</td>
<td>Audit Protocols</td>
</tr>
<tr>
<td>Information Documents</td>
<td>Schedules &amp; Rosters</td>
<td>Critical Hazard</td>
<td>Environmental</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Standards</td>
<td>Performance</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Standards</td>
</tr>
</tbody>
</table>

Health and Safety and Environmental Departments have developed procedures and guidelines to assist areas in developing their operational control documentation. These documents are all controlled under the Document Control System and can be referenced through the intranet.

Key risk standards being Critical hazard Standards (CHS) and Environmental Performance Standards (EPS) have been developed to stipulate the operating criteria.

Permits to work

Permits that are used on site at SIGM are:

- Hot Work Permit;
- Confined Space Permit;
- Excavation/Dig Permit;
- Power/Corridor Permit;
- Isolation Handover Permit;
- Isolation Handback Permit;
- Tyre Disposal Form. SIG-ENV-FM001
- Surface Disturbance Form. SIG-ENV-FM002
- Heap Leach Material Usage Permit contained within SIG-ENV-PR003

Area Managers are responsible for appointing permit issuers (where applicable) for permits that fall under their department’s control.

JHA

The relevant Area Manager is responsible for ensuring that relevant tasks are subjected to the Job Hazard Analysis process (refer to SIG-EHS-PRO005 – Risk Management Tools Procedure). They are also responsible for ensuring that these documents are routinely reviewed prior to the task being conducted using the JHA, either within the department or collaboratively with other departments and specialist advisors.
Physical Operational Controls and Inspections

The operation uses a large variety of physical controls to effectively control and reduce risk; these include engineering controls, infrastructure controls, alarm systems where significant risks exist. Physical controls are inspected frequently to ensure that these controls remain functional and effective.

Maintenance inspections of all areas of the operation occur routinely with corrective actions being tracked through the Pronto system and planned inspection program.

Business partners

Contractual requirements for Business partners stipulate the need to submit Environmental, H&S management systems/plans that address operational risk associated with their scope of work.

Outcomes/Records:

Operational documentation as listed under General guidance notes above. Completed permits to work, completed JHA’s where relevant. Business partners roadmap and supporting documentation.
6. Communication, Participation and Reporting

Intent

To ensure that EHS matters are adequately communicated to all SIGM Personnel and Business Partners, that opportunities are regularly provided for effective two-way communication, that effective cross-communication exists throughout the Company, and that systems are in place for the communication of safety and environmental matters to and from external parties.

To ensure that all SIGM Personnel and Business Partners consistently practice, and are committed to, safe working behavior and work practices with respect for the environment; and that managers’ actively pursue and support the involvement and participation of employees in the development, execution and review of safety and environmental initiatives.

Guidance Notes

**General Communications:**

The following information is communicated to SIGM Employees:

- SIG-GEN-PY001 – Environmental Policy;
- SIG-GEN-PY002 – Health and Safety Policy;
- SIG-GEN-PY003 – Community Policy;
- Plans, objectives and targets;
- Performance against targets (refer to KPIs);
- Results of audits and reviews.

**Health and Safety Issue Resolution and Refusal to Work**

The Manager - Employee Relations is responsible for ensuring that SIGM maintains a formal procedure (SIG-Health and Safety-PRO004 Safety & Health Issue Resolution and Refusal to Work Procedure) that outlines the process to deal with any issues of this nature for employees, this is communicated in the lease induction.

**Notice Boards**

Each area shall have a red EHS notice board and a grey general notice board mounted in areas most frequented by employees.

The red EHS notice boards shall be used to communicate:

- Area EHS Committee meeting schedule and minutes
- External Agencies Correspondence (DoMP/DoCEP, DEC and DPM correspondence)
- Monthly safety and environmental statistics
- Incident/Hazard Alerts (EHS)
EHS issues/weekly themes
Improvement Notifications (PINS)

The grey general notice board should have the following:

- Current EHS Policies
- Business Plan
- Area EHS Contact details
- Safety and Environmental memos/information issued by Area Manager
- Health promotion material
- General EHS related material

The Area Manager shall appoint an administrator (or other responsible person) to be responsible for checking the EHS Notice Boards on a monthly basis to ensure they are up to date and presentable and to remove any unauthorised material.

Mines Record Book Entries

The Mines Record Book is to be maintained in all production areas and:

- All entries into the Mines Record book made by inspectors are to be photocopied and posted on the notice board.
- The Mines Record Book is to be located in a secure location and made available upon request to be viewed by any employee.
- All Mines Record Book Actions are to be entered into SiteSafe for tracking.

SiGM Intranet

All EHS management system documents are to be made available on the SiGM Intranet, and shall be reviewed every two years as a minimum to ensure the information provided is current, complete, relevant and accessible to all.

Health and Hygiene Promotion

The Hygiene Advisor and Occupational Health Nurse shall ensure that health and hygiene information is disseminated across site. Pamphlets and Posters shall be displayed on General Notice Boards. Information shall relate to the health and well being of the workforce, including: scheduled Health and Hygiene Promotions.

EHS Alerts

EHS Alerts (SIG-Health and Safety-TMP002 – Safety Alert Template) shall be used to ensure that key learning’s from significant incident are disseminated to all applicable employees to prevent recurrences or highlight situations where sound Health and Safety systems have minimised the potential outcomes.
The EHS Alerts shall be distributed to all Safety Representatives, Supervisors and Area Managers for discussion with their teams. These EHS Alerts will also be emailed out to site and posted on the area red notice board.

Area Managers/Area Supervisors shall ensure that EHS Alerts relevant to their area are discussed at Tool Box or other EHS meetings as appropriate.

**CONSULTATION PROCESSES:**

**Quarterly EHS Management Review Meeting**

A quarterly EHS management review meeting is to be held on site for the senior management, the primary purpose of this meeting is to discuss:

- Progress against site wide EHS objectives, Targets and KPI's; Site safety and environmental statistics (e.g. compared to previous quarter, incident trends);
- Monitoring Results (FFW, Dust, Noise etc).
- Results of the EHS Audits (eg EHS Management Standards, CHS and Area Environmental Audits);
- Significant EHS Issues and Achievements
- Progress against Area EHS objectives, Targets and KPI’s; and
- any changes to current legislation, codes or other requirements.

Meeting minutes are recorded in SiteSafe and shall include details of attendees; items discussed and proposed actions (including responsibility and time frame).

**Department Managers’ Meeting**

The Department Managers’ Meeting shall be held on a regular basis.

Any communication regarding EHS issues of relevance to the site shall be cascaded from this meeting by the Department Managers to the workforce via the first available area/section meeting.

**OHS Department Meetings**

The Health and Safety Department has a Monthly “Whole of Site” OHS Meeting (all area Health and Safety Advisors attends this meeting, which serve as a forum to communicate any changes and improvements to Health and Safety Management on site.

**Environmental Department Meetings**

The Environmental Department holds a weekly meeting to discuss environmental issues and work priorities.

The Department also attends the monthly area meetings to provide support to the operations teams and raise awareness of environmental issues and requirements on site.

**Participation processes**
All relevant incidents shall be discussed during toolbox and Health and Safety committee meetings to ensure that all employees are aware of the events surrounding the incident and corrective actions and are able to offer suggestions as to how the incident relates to activities in their area and how it could have been avoided. Reports on incidents are available from SiteSafe on a daily, weekly, monthly, yearly basis.

**Pre-Shift EHS Briefs**

Managers shall ensure that pre-shift EHS briefs are being conducted for all areas on a continuous roster. These meetings provide supervisors with an opportunity to inform employees about specific hazards that may be encountered during the forthcoming shift and the control measures used to manage the associated risks. In addition, a specific OHS & Environment topic shall be discussed for each 24-hour cycle.

**Toolbox Meetings**

Toolbox Meetings shall be used to provide information on specific Health and Safety and Environment topics and foster discussion so that awareness of the topics can be increased.

Each area shall maintain a register of toolbox topics and supporting information.

The EHS Representative of the work group shall chair the meeting. Each member of a shift crew/work group is required to attend Toolbox Meetings.

Toolbox Meetings shall be held at least monthly for all crews and provide employees with an opportunity to raise issues of concern and to exchange ideas on solving problems. These meetings are to be formalised and recorded along with actions managed as per site action management process.

Area Supervisors are responsible to ensure toolbox meetings are held as a minimum once per month for shift and the following criterion should be reviewed:

- Communicate values and expected behaviours related to Health and Safety and environment;
- Provide information on standards, policies, procedures or rules;
- Changes in the EHS Management System, and
- Gain feedback from employees.

**Area EHS Committees**

SILM Areas shall have EHS Committees under as per Section 65 of the Mines Safety and Inspection Act 1994.

The Department manager is responsible for ensuring EHS committee meetings are scheduled and conducted.

Employees shall have the opportunity to select an EHS Committee Representative and be informed of who are the EHS Committee members in their Area.

Each Area must establish an Area EHS Committee charter, which as a minimum must state:
Membership & Structure;
Chairperson;
Calling of Meetings (at least monthly);
Agenda Items;
Minutes of Meetings; and
Actions.

Minutes of each Area EHS Committee meetings shall be recorded and reviewed at subsequent meetings. Actions to be entered as per site action management process. Copies of minutes shall be distributed and posted on the Area EHS red Notice board and communicated by the Area OHS Representative at area toolbox meetings.

REPORTING PROCESSES:

DMP / DoCEP Reporting

The Registered Manager of the Mine is responsible for ensuring compliance with this and other reporting requirements under the Mines Act & Regulations (see DoCEP Reporting Guidelines).

DMP and DEC Reporting

The Environment Department provides external incident reports to DMP and DEC, with regards to any reportable environmental incidents or any other compliance related issue. These are reported through:

  External Environmental Incident Reporting Form. SIG-ENV-FM016.

The General Manager of the Mine is responsible for ensuring compliance with this and other reporting requirements under the Mining Act 1978 and Environmental Protection Act 1986 (and associated Regulations).

Business Partners Reporting

The Health and Safety and Environmental Departments shall:

  Ensure that a report of all incidents recorded for the previous 24 hours is available from SiteSafe;
  A summary of all incidents from Thursday-Wednesday is compiled in a weekly report. That is sent out to all areas, including corporate.

The Health and Safety Department shall prepare monthly reports for the General Manager, Area Managers and corporate, summarising:

  Health and Safety statistics;
  Incidents and results of investigations;
  Corrective action status;
Quarterly Site OHS Reports (for presentation at the EHS quarterly presentations);

The Environmental Department shall prepare the following reports for the General Manager, Area Manager and Corporate:

- Monthly Reporting (combined with the monthly Health and Safety report);
- Monthly Management Report;
- Quarterly Site Environmental Reports (for presentation at the EHS quarterly presentations); and

**External Communication**

All EHS external communication with Government agencies and other interested parties under normal, abnormal and emergency is the accountability of the General Manager or delegate. The release of this information shall be at the discretion of the General Manager.

Department / Area Managers are responsible for ensuring that legislative reporting requirements under the Mines Safety and Inspection Act 1994 and the Mines Safety and Inspection Regulations 1995 as detailed in DME Guideline – Occurrence, Accident and Occupational Disease Legislative Reporting Requirements – May 2001 are complied with via the General Manager and that all Supervisors are aware of and understand those and SIGM requirements.

SIG-OHS-FM002 – Occurrence Report Form DoMP

SIG-OHS-FM003 – DoCEP Electrical Shock Form.

Department / Area Managers shall ensure that the appropriate Health and Safety Representatives are notified without delay of any accident or dangerous occurrence (refer S.60 (6) Mines Safety and Inspection Act 1994).

The Manager - Environment is responsible for ensuring that legislative reporting requirements under the Environmental Protection Act 1986 and Mining Act 1978 are complied with. Specifically reporting under the SIGM DEC Operating License and mining tenement conditions.

The Manager - Environment or authorised delegate is responsible for receiving, documenting and responding to relevant communication from external interested parties in relation to SIGM significant environmental hazards/aspects, which includes information from:

- State Regularity Bodies (DEC, DMP, EPA, and DoCEP/ RSD);
- Local Authorities (Shire of Coolgardie);
- Key Stakeholders/Industry Bodies (WACME, GEMG);
- Pastoralists (Mt Monger, Woolbar, Madoonia Downs);
- Native Title Claimants; and
- Neighbouring Mine Sites

It is the responsibility of the Occupational Health Nurse to ensure that each month Mining Injury Report Forms and a Monthly Status Report form are completed and sent to the
Department of Consumer and Employee Protection (DoCEP/ RSD) as required under the Mines Safety and Inspection Act 1994 and Mines Safety and Inspection Regulations 1995.

SIG-OHS-FM001 – DoCEP Mining Injury Report Form
SIG-OHS-FM004 – DoCEP Monthly Status Report Form shall be used for all occurrence reports for DoCEP/ RSD.

Communication of environmental incidents to the Department of Environment and Department of Mines and Petroleum will be undertaken by the Manager - Environment as required, using the External Environmental Incident Notification Form.

Outcomes/Records:

In production areas Mines record book. Minutes of quarterly EHS management review meetings, Department Manager’s meeting minutes, Environment department meeting minutes and OHS Department monthly meeting minutes. Toolbox and Pre-shift meeting minutes and EHS Committee meeting minutes. Evidence of EHS regulatory reporting as required, EHS monthly reports and EHS quarterly reports.
7. Competence, Training & Awareness

Intent

To ensure that SIGM Personnel and Business Partners are appropriately trained and competent to conduct activities in accordance with the requirements of the EHS management system.

Guidance Notes

Identification of EHS Training Needs

EHS Training Needs shall be identified from an analysis of:

- Area Hazard & Risk assessments.
- SIG-EHS-STD001-EHS Management System Standards;
- Operational Controls. and
  - Roles and responsibilities of various personnel

The Area Manager is responsible for ensuring area training needs are identified for all positions and reviewed annually via the EHS training needs matrix. The Area Manager or delegate when selecting a person for training shall consider the following: the risk to the business if the information is not provided, and the person’s ability to understand the training provided.

An EHS Training Needs Matrix (eg Sharepoint) will be prepared in consultation with the person nominated as the Area Training Coordinators and containing:
  - course name;
  - training course identification;
  - Training provider, duration of the training course;

Training Schedule

The Area Training Coordinators, or nominated persons, shall develop and maintain an annual training matrix that identifies EHS training for the current calendar year, and as a minimum addresses all SIGM EHS Training Needs.

Mandatory and position requirement training as identified in training needs shall be completed within the first financial year of employment; all other identified development training required shall be scoped in the annual performance appraisal process. Funds required for training in the next financial year shall be budgeted for in the training budget.

EHS Awareness Training - Induction

The Area Managers are accountable for ensuring that the requirements for the induction of employees, Business partners and visitors are carried out. This shall ensure that individuals on site receive a level of H & S and Environmental awareness training appropriate to the level of risk associated with their activities on site.

Area Supervisors are responsible for ensuring that all personnel have completed the applicable current induction and have the identified competencies prior to commencing work un-supervised in their area.
Site SIGM Inductions are conducted in accordance SIG-EHS-PR002 – Site Access and Induction Procedure.

**Evaluating the Effectiveness of Safety & Environmental Training**

The effectiveness of training and competency is evaluated through:

SIG-HR-FM001 – Training Evaluation Form: and Task observation process.

**Training Records**

Area Training Coordinators are responsible for maintaining records of all training undertaken (Individual Training Files) and the update of the area training matrix.

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**Outcomes/Records:**

Current position descriptions, individual recognition development reviews, EHS training needs and training completed matrix, area induction records, individual training file (found in Sharepoint database), completed Task observation and training evaluation forms.

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**8. Structure and Responsibility**

**Intent**

To ensure that the responsibility of all SIGM Personnel and Business Partners, as they relate to safety and the environment is defined, documented, maintained and understood. To provide adequate resources eg skilled/competent persons, equipment, information, and financial.
Guidance Notes

The Manager - Employee Relations is responsible for ensuring that SIGM develops and communicates the Site Organisation Chart. This shall be placed on the Intranet. The Organisation Chart shall be reviewed and updated if necessary monthly by the Manager - Employee Relations.

Responsibility and Accountability

The following tools are used to communicate responsibilities and accountability:

- Organisation charts
- SIG-HR-TMP025 – Position Description
- SIG-EHS-TMP004 – Appointed Persons as per SIG-EHS-PRO 007.

Maintenance

The Manager - Employee Relations in consultation with the Departmental/Area Managers is accountable for ensuring that the organization charts remain current.

The Department and Area Managers are accountable for ensuring Performance management reviews (RDR's) are conducted on a 6 monthly basis and Position descriptions are reviewed annually and amendments made when accountabilities and responsibilities change

All Position Descriptions shall contain, as a minimum, a clear statement of EHS compliance to the EHS Management System.

Appointed Persons

The General Manager is accountable for ensuring that the appointed persons process is in place. The Department/Area manager is responsible for ensuring appointments required are made.

- Appointments shall be made according to the SIG-EHS-PRO007 – Appointed Persons and Area Accountabilities Procedure;
- Appointments shall include a clear description of statutory responsibilities and where applicable the appointments will also define physical areas of responsibility.

New/Transferred Employees

New or transferred employees shall have their EHS responsibilities clearly explained to them by their supervisor at the commencement of their employment with SIGM or whenever they move into a new role.

Positional Change

In the event of an organisational change, the Area Manager or delegate shall ensure the following occur:
Revision of Position Descriptions
Revision of Appointed Persons Appointment
Notification to employees (generally via email)
Organisation chart updated

Delegation

In the event of a SIGM employee taking leave, Department Managers are responsible for ensuring that the SIGM employee taking leave delegates their relevant authorities, which must include any appointed person responsibilities (SIG-EHS-PRO007 – Appointed Persons and Area Accountabilities Procedure).

Responsibilities for the EHS Management System

The Manager - Employee Relations and the Manager - Environment are responsible for developing, implementing and maintaining the EHS Management System.

Outcomes/Records:

Completed appointed persons documentation, position descriptions (currency within last 12 months), RDR's (minimum 6 monthly), current organisation chart(s).
9. Emergency Response

Intent

To ensure that in the event of an emergency, plans and capabilities are in place for dealing with such situations in a manner which has the priority to preserve the Health and Safety of people, protection of the environment and preservation of SIGM’s capability and reputation.

Guidance Notes

General

The following documents have been developed for the management of Emergency Management:

SIG-EHS-PL001 – Emergency and Crisis Management Plan
SIG-EHS-GU009 – Developing an Area Emergency Plan Guideline
SIG-EHS-GU010 – Emergency and Crisis Management Guidelines

SIGM shall Comply with the requirements of the WA Mines Safety and Inspection Regulations, 1995, Part 4, Division 3, Emergency Preparation; and SIGM DEC Environmental License (4570) by identifying all potential emergency situations via a risk assessment. This will form the basis of the Emergency and Crisis Management System.

Emergency Management System

The Emergency and Security Superintendent (ESS) is responsible for maintaining department risk register and up-dating the Emergency and Crisis Management System documents. These documents must, as a minimum, detail the emergency response for the identified credible emergencies.

The above documents shall be reviewed immediately following the occurrence of major accidents or emergency situations. Any change in the operation shall prompt an immediate review of Emergency and Crisis Management documents.

After any emergency response, the Emergency Services Officer (ESO) shall review the adequacy of the emergency response and identify and action any opportunities for improvement. These will be documented using an incident de-brief form and forwarded to the ESS for review.
Resourcing the Emergency Management Standard

SIGM General Manager is responsible for provision of adequate resources to the SIG-EHS-PL01 – Emergency and Crisis Management Plan to ensure the effective management of any emergency situation. The General Manager is accountable for the appointment of the crisis management team.

The ESS is responsible for ensuring that persons assigned particular roles or tasks under the SIG-EHS-PL01–Emergency and Crisis Management Plan understand their roles and responsibilities.

The ESS is responsible for ensuring that all members of Emergency Response and Management Teams are adequately trained to safely deal with any likely emergency situation. These requirements shall be identified in the Training Needs Analysis (TNA) and entered into the departments Training Matrix.

The ESS is responsible for the development of an annual schedule of training for the Emergency Response Team, volunteers and the Crisis Management Team.

The ESS is responsible for the development of a schedule to test the actual response and participation of emergency situations identified for the ERT and CMT.

The Area Managers are responsible for the scheduling of testing the area evacuation process so all employees participate as a minimum annually.

Emergency Response Equipment

The ESS is responsible for ensuring that emergency response equipment is maintained and ready for an emergency at all times.

Emergency Services Manifests

The Area Manager is accountable for the appointment of Area Hazardous Materials officer.

The Area Hazardous Materials officer is responsible for the development of the area Emergency Services Manifests that shows the following appropriate location of:

- Means of egress;
- Emergency Mustering Points;
- Portable fire extinguishers;
- Fixed fire suppression systems;
- Alarm systems;
- Spill containment and clean-up equipment;
- Safety Showers and Eye Washes;
- First Aid Box;
Evacuation Plan;
Hazardous Substances;
Material Safety Data Sheets; and
Emergency Response Cabinets.

Also Auditing the Emergency Service Manifest for any changes on a quarterly basis or immediately following any material change to the information on the Manifest and ensuring a current copy of the Emergency Service Manifest is at a identified location at the entrance to area.

Security Response

Any emergency on site will be monitored by the Security staff at the Lefroy Mill.

During the course of the emergency, the Security staff will have radio contact with the ESS and response teams.

Security staff at the Lefroy Mill will document all aspects of the emergency on the “Emergency Log” and SIGM Emergency Call Record.

Measurement and Evaluation

The ESS is responsible for arranging a full audit of the Emergency and Crisis Management Plans at least every 2 years by an “independent” person (i.e. external auditor or competent person from another field).

Outcomes/Records:

Area evacuation plans and evidence of annual testing and debrief. Area emergency services manifest and evidence of quarter year audits of the manifest.

ESS.

Current risk registers for all departments. Completed debrief forms from areas annual testing of evacuation plans. Training matrix of EMRT. Evidence of maintenance of EMR equipment. Evidence of 2 year audit of ESS by an external auditor.
EMERGENCY MANAGEMENT

Identify key emergencies

Conduct risk assessment on potential emergencies

Review after occurrence / change or when necessary

Develop emergency preparedness and response procedures

Surface emergency manifest all areas

Underground full Box Evacuation System

Surface areas one/two page evacuation plan

Crisis management

Response and recovery

Response team

Evacuating personnel

Crisis management team

Areas to test evacuation groups

Test scenario's

Test procedures and equipment

Train response
10. Contractor Management

Intent

To ensure that the contracting of services, and the purchase, hire or lease of equipment and materials does not cause harm to personnel, the public, property or the environment.

Guidance Notes

The contractor selection process is administered by SIGM’s Commercial Department. As such they control the list of approved Business partners and facilitate any associated selection processes. They provide ongoing advice and assistance to Works Supervisors and SIGM Representatives on issues associated with contract classification and implementation. They will also act as a central point to maintain records of Major and Minor contracts and procurement of high use items through the vendor database. Records of orders will be maintained in pronto. This can also include the following: completing specialist audits when required, assisting with the evaluation of submissions, updating relevant sections of the site conditions, providing practical advice to Works Supervisors and Task Coordinators.

Department managers are responsible for purchase of goods, equipment and services that are not part of Commercial Department’s scope. In doing so, the manager must consider the EHS risks and risks to the business in that purchase process. Normally these purchases are controlled by a work order or purchase order.

Operational Control of Contracts

Contractor management is controlled using SIG-EHS-STD002 EHS Contracts CMS Specifications Standard and is issued as part of any Tender. This document sets out the minimum contractor requirements. Once the contract is awarded, it remains the contract owner’s responsibility to ensure that work is carried out in accordance with agreed plans and processes, and that the contractor’s EHS systems are working in line with Companies EHS systems. The way in which this is achieved will vary depending on the type of contract. SIGM’s role will involve either: The contract owner’s responsibility is to ensure that work is carried out in accordance with agreed plans and processes by, direct supervision of the contractor and their employees and/or Management via contractors own Supervision and KPI’s.

EHS Reviews

EHS reviews are conducted against all major contract tenders as part of selection process. EHS external audits are conducted against all major contractors annually against submitted EHS road maps.

Outcomes/Records:

EHS requirements are specified and communicated in: Business Partners contracts, completed purchase and work orders. Business partners completed roadmaps.
11. Document Control & Records Management

Intent

To ensure that processes are in place for the identification, maintenance and disposal of all EHS documentation, such that only current and approved documents are available for all SIGM and Business partners. Maintenance includes storage, protection and retrieval of records.

Guidance Notes

Document Control and Record Management

The following documents have been developed for the management of EHS documents: GFA-IT-STD001 – GFA Document Control Standard, SIG-GEN-PR002 – Records Management, SIG-GEN-PR003 Archiving Procedure. All controlled documents are located in the SIGM intranet under controlled docs and all records in secure files in each area to protect against damage, loss.

Historical Controlled documents

Prior to SharePoint implementation previous versions of Controlled documents are stored in \SIGI07\Controlled Document. All Version number in the new SharePoint automated system revert back to start at Version 1.0.

Responsibilities

The Department/Area Managers are responsible for the appointment of a document controller. The Appointed Document controller is responsible for the updating, removal and Archiving of controlled documents and for the training of the document control process. This responsibility includes management of area records.

It is the responsibility for All Departments and Business partners to comply with the above Documented procedures.

Outcomes/Records:

Evidence of an appointed Document Controller. Register or equivalent of area records maintained and review of that register. Records of archived documents.
12. Incident Management

Intent

To ensure that all accidents and incidents are identified, reported and investigated, aimed at preventing recurrence, is implemented.

Guidance Notes

General

The following documents have been developed for the management of EHS documents.

- SIG-EHS-GU008 Hazard/Incident Reporting Guideline
- SIG-EHS-GU007 - Hazard/Incident Investigation Guideline.
- SIG-OHS-PR008 - Workers Compensation Procedure.

The Area Managers are responsible to ensure that: all incidents are reported entered into SiteSafe and closed out, investigated, actioned and employees OHS representatives participate in incident investigations.

Injury Classification and Reporting

All SIGM Personnel and Business Partners are required to report hazards/incidents and injuries including near misses according to the process outlined in SIG-EHS-GU008 Hazard/Incident Reporting Guideline and recorded into Site Safe

Injuries shall be classified according the SIGM Injury Classification – Quick Reference which can be found in SIG-EHS-GU008 Hazard/Incident Reporting Guideline. This classification is based on AS1885.1:1990 – Workplace Injury and Disease Recording Standard. The risk rank of an incident determines the level of investigation as outlined in the SIG-EHS-GU008 Hazard/Incident Reporting Guideline.

Incident Investigation

Investigation of incidents at SIGM shall be undertaken according to the process outlined in the SIG-EHS-GU007 - Hazard/Incident Investigation Guideline. When conducting an Incident Investigation the following documents shall be used:

- SIG-EHS-TMP006 – Incident Investigation Template;
- SIG-EHS-TMP007 – Formal Investigation Template.

Any statements that are required during the incident investigation shall be conducted in accordance with SIG-EHS-TMP008 – Statement Template.

SIG-EHS-FM004 – Investigation SCAT Chart is a systematic cause analysis technique shall be used during incident investigations to assist in identifying immediate and basic causes.
Actions from investigations shall be entered as per SIGM action reporting requirements.

Incident Close Out

The General Manager is accountable for ensuring all MTI, LTI, SPI and all Environmental incidents above level 2 are acknowledged by signing off the relevant documentation.

The Area Manager is responsible for ensuring all incidents other than the above are closed out, (e.g. Hazards, MI’s, near miss, equipment damage, process loss, environmental below level 3).

Environmental incidents that are rated level 1 & 2 are managed by EHS Coordinators. Environmental incidents that are rated 3 to 5 are managed by the Environment Manager.

Analysis

OHS advisors or delegate are responsible for the analyses of OHS incident rates to determine trends and to enable corrective and preventive actions.

Incident statistical reports are available from SiteSafe on an as needs basis.

Injury Management and Rehabilitation

The Injury Management Coordinator is responsible for overseeing all injury management and rehabilitation processes for ill or injured (work or non work related) employees with the aim of providing the means for them to return to the workforce as soon as possible. This shall be done in accordance with SIG-OHS-PR007 – Injury Management and Rehabilitation Procedure.

The Injury Management Coordinator is responsible for processing and monitoring all Workers Compensation claims for SIGM Mining Company Pty Ltd employees.

Outcomes/Records:

Completed investigation reports and actions in SiteSafe. Relevant injury management documentation eg claims, return to work plans.
Hazard / Incident Report entered into Database
Incidents closed out by person entering
MTI, LTI, SPI, L3-4-5 environment incidents move up line
All other incidents closed out by Area Manager

Investigations completed within 14 days

Department Manager
GM closes out within 30 days

Department Advisor monitors close out

All incidents/investigations closed within 30 days
13. Monitoring and Measurement

Intent

To ensure EHS performance and systems are monitored to identify trends, measure progress, assess compliance and drive continuous improvement.

Guidance Notes

Monitoring (Health)

The Hygiene Advisor maintains the following documents to assist in the management of health hazards:

- SIG-OHS-STD001 – Occupational Hygiene Exposure and Action Level Standard;
- SIG-OHS-GU002 – Health and Hygiene Reporting Guidelines;
- SIG-OHS-PR011 – Potable Water Sampling Procedure; and
- SIG-OHS-PR012 – Health Surveillance Procedure.

The Hygiene Advisor maintains a calibration register for hygiene monitoring equipment.

Monitoring (Environment)

The Environmental Advisor (or nominated proxy) is responsible for maintaining procedures for monitoring. This includes quarterly review and reporting of changes to Environmental legislation and other codes subscribed to by SIGM.

Specific environmental monitoring activities on site include:

- Collection of groundwater samples from selected Tailings Storage Facilities bores (reference DEC Licence).
- Collection of groundwater samples from Heap Leach monitor bores (reference DEC Licence).
- Collection of water samples from all dewatering points and Lake Lefroy control sites (reference DEC Licence Groundwater Licences).
- Water sampling and groundwater depths from selected monitor and production bores at the Mt Morgan Bore field (as per Groundwater licence).
- Collection and recording of dewatering volumes from selected dewatering sources (as per Groundwater licence). Collection and recording of Mt Morgan Bore field abstraction rates. Collection of site-wide data for National Pollutant Inventory (NPI) reporting.
- Flora and fauna surveys as required.

Monitoring requirements and changes for International Cyanide Management Code are communicated to EHS Department by Processing Department.
Monitoring (Safety)

OHS department undertakes monthly and quarterly reports on OHS performance that measures and monitors trends for injuries, incidents, Hazard reporting against set KPI’s for each area and the site. Changes to Health and Safety legislation is carried out quarterly, any changes are communicated at quarterly EHS meetings.

Fitness for Work

The Emergency Services Superintendent is responsible for the management of testing for Fitness for Work on site, in accordance with the following documents:

SIG-OHS-PR010 – Fitness for Work Procedure.

Data Management

Hygiene data is managed and controlled by the Hygiene Advisor. Yearly statistical analysis of Similar Exposure Groups is conducted to identify trends within monitoring data, recommend actions for improvement and to be used as a reference point for developing ongoing monitoring programmes.

The Environment Department uses a combination of excel worksheets and ARCG is for environmental data management.

Data from samples sent off-site to external laboratories is received electronically and incorporated into the relevant databases to minimise risk the of transcription errors whereas other data is entered manually.

The Health, Safety & Environment Departments are responsible for making monitoring data available to Department Managers as a basis for decision making in operational and process matters. The Regulatory Agencies are notified when Operations become aware of data indicating a non-compliance with a License or other legal requirement communication check reporting.

Area EHS Workplace Inspections

Area EHS workplace monthly inspections shall be scheduled. Completion of inspections forms part of the Area EHS Compliance Schedule.

SIGM Planned Inspections shall be recorded using SIG-EHS-TMP-011 – Planned Inspection Template. The inspections shall identify substandard, unsafe or unacceptable health, safety and environmental conditions and practices.

Outcomes/Records:


Intent

This describes the internal and external processes employed by SIGM to identify trends, measure progress, assess compliance and drive continuous improvement associated with the EHS Management System.

Guidance Notes

General

Audit Protocols or Checklists have been developed for each EHS Management System Standard, Critical Hazard Standard and Environmental Performance Standard.

Each EHS Management System Standard, Critical Hazard Standard shall be audited as per the audit schedule. Each Environmental Performance Standard is audited in accordance with the Area Environmental Audit schedule and area specific audits.

All nominated audit personnel must be deemed competent by SIGM and be impartial to the area they audit.

EHS Management Standards performance is reviewed on a quarterly basis refer to the audit schedule and presented to the management team at the Quarterly EHS Review Meetings.

Conducting Audits.

The audits will be conducted using SIG-EHS-TR001 Internal Auditor Training presentation as a guide to the process. All audit results are recorded using the developed audit checklists found on controlled documents.

The audit protocols contain essential information on the cover sheet as to how to conduct the audit. It is essential to the audit process that evidence is gathered and attached to the audit protocol to provide verification of the audit results. Examples of verification can be:

- Digital photographs
- Completed Forms
- Emails
- Copies Meeting Minutes
Close–Out

At the completion of audit the action registers are to be completed by the auditor in consultation with the area Manager or delegate. Actions not immediately closed out to be entered into the SiteSafe with action number documented in audit protocol.

Each audit is to be signed off by the Auditor and area Manager or delegate. Records of completed audits are available for view via controlled documents/ select records search.

Environment Performance and Safety Critical Hazard Standards

The following CHS and EPS standards have been identified as the current major EHS risk on site.

There are ten Critical Hazard Standards (CHS) at SIGM that have been established and maintained.

SIG-EHS-CHS001 – Explosives
SIG-EHS-CHS002 – Hazardous Materials
SIG-EHS-CHS003 – Inrushes and Subsidence
SIG-EHS-CHS004 – Isolations
SIG-EHS-CHS005 – Safe Work at Height
SIG-EHS-CHS006 – Underground Fires
SIG-EHS-CHS007 – Underground Ground Control
SIG-EHS-CHS008 – Underground Ventilation
SIG-EHS-CHS009 – Slope Stability
SIG-EHS-CHS010 – Site Vehicles and Mobile Equipment

Each area Manager must identify from the above list applicable CHS standards for their area of control and document these in a compliance audit schedule or risk register. This audit schedule will require auditing compliance at least once every two years.

Environmental Performance Standards

There are fifteen (15) Environmental Performance Standards (EPS) at SIGM. These have been identified as key risks at SIGM, and are listed below:

SIG-ENV-STD002 – Contaminated Site Management
SIG-ENV-STD003 – Cyanide Management
SIG-ENV-STD004 – Flora and Fauna Management
SIG-ENV-STD005 – Heap Leach Facility Management
SIG-ENV-STD006 – Hydrocarbon Management
SIG-ENV-STD007 – Progressive Rehabilitation
SIG-ENV-STD008 – Tailings Management
SIG-ENV-STD009 – Visual Impact Management
SIG-ENV-STD010 – Air Quality Management
SIG-ENV-STD011 – Exploration Management
SIG-ENV-STD012 – Waste Rock and Stockpile Management
SIG-ENV-STD013 – Water Management
SIG-ENV-STD014 – Closure Planning and Provisioning
SIG-ENV-STD015 – Energy Management
SIG-ENV-STD016 – Waste Management

SIG-ENV-STD001 – Chemical Management (Hazardous Materials) is now combined into SIG-EHS-CHS002 – Hazardous Materials (which was updated in 2009 to address environment, health and safety issues around the handling and storage of hazardous materials)

Each area Manager must identify from the above list applicable EPS standards for their area of control and reflect these in the area risk register. Audit of compliance at least once every two years through the Area Environmental Audits and/or area specific audits with cooperation of the environmental group, eg technical advice.

**External Management System Audits**

SIGM is certified to International Environmental standard eg ISO 14001 as well as International Occupational Health and Safety Management standard eg OHSAS 18001:2007 by a JAS-ANZ accredited certification body.

All identified deficiencies, eg Observations and Non-conformances from external audits are addressed through the SiteSafe system.

All major Business partners are audited yearly by external party organized by the company.

**Outcomes/Records:**

Audit schedules for CHS, EPS and EHS. Completed audits eg checklists/protocols. Action register in the audit protocol of audits conducted is completed. Actions entered into SiteSafe from audits/inspections are completed effectively and efficiently.
15. Action Management

Intent

To ensure that corrective and/or preventive actions are implemented to minimise the recurrence of any non-conformance and to reduce the severity and duration of the impact of the non-conformance.

Guidance Notes

Identifying Actions

As a minimum, Health and Safety and environmental actions can be identified from (but not restricted to):

- Internal / External Audits
- Risk assessments
- Monitoring programs (i.e. non-compliant results)
- Incident / Hazard reports
- Investigations
- Community Complaints/ Public Concerns
- Workplace inspections
- Suggestions from the work-force
- Planned inspections
- Health and Safety and General Meetings
- EHS Management Review meetings.

Maintenance type actions are exempt from Site Safe In areas where a computerised maintenance system (SAP, Pronto, Main Pac etc) is used to manage maintenance type actions.

Action Record

All EHS corrective actions that cannot be signed off as being completed on submitted documentation shall be registered in the site Action Register in SiteSafe and a action number registered on submitted documentation. This ensures that they are assigned to a responsible person for close out within a specified time.

Department Managers, Area Managers, Supervisors and Area Administrators are responsible for implementing, monitoring and communicating the status of corrective actions.

Action Management.
The Area Manager is accountable for ensuring actions are assigned and effectively completed and closed out in time allocated. **Note: this responsibility needs to be checked prior to employees who have actions assigned to them leave that area or SIGM permanently. That the action is either completed or re-assigned.**

All assigned individuals are responsible for the completion and close out of the corrective actions. If action is unable to be completed within the noted time frame consultation is required with the Area Manager regarding resolution.

**Monitoring action close out**

Action reports are available from SiteSafe.

Monthly action status is communicated via the EHS monthly report.

**Verification**

The Area Safety Advisor or delegate is responsible for completion of monthly verification checks. As a **minimum** the sample of checks will be 10% of all SiteSafe actions signed off as “**completed**”, from the previous month.

The Area Safety Advisor or delegate is also responsible for completion of monthly verification checks of all **completed planned inspections and Task observations** completed from the previous month. The sample rate again is a minimum of 10% of completed inspections and observations.

The verification evidence can either be recorded on SIG-EHS-FM024 Inspection Verification record form. Or copies of the first page of the documents verified that must be signed and dated by the Area Safety Advisor.

Actions raised from Area Environmental Audits are verified in subsequent audits.

**Outcomes/Records:**

Verification evidence. Maintenance records eg Pronto or equivalent. Review of SiteSafe overdue actions.
16. Management Review

Intent

To determine the continuing suitability, adequacy and effectiveness of the EHS Management Systems, along with setting the direction for ongoing improvement in EHS performance.

The outputs from management reviews shall include any decisions and actions related to possible changes to Policies objectives, Targets KPI’s and any other elements of the EHS management system consisting with the commitment to continual improvement.

Guidance Notes

EHS Review

Performance review meetings are held monthly, the primary EHS purpose of this meeting is to discuss items such as:

- Progress against objectives and targets
- Results of Audits
- Site safety and environmental statistics;
- Outstanding Actions;
- Safety & Environmental Monitoring and Measurement
- EHS Initiatives and Opportunities
- Health & Hygiene Monitoring Results (FFW, Dust, Noise etc)

Annual Review

Once a year an annual review shall be conducted. At this meeting senior management shall review the functioning of the SIGM EHS Management System as a whole, to ensure it’s continuing suitability, adequacy, and effectiveness. The review shall also include but not be limited to the following:

- Review previous Management review actions.
- Policies, eg Community, Health and Safety and Environment.
- Legal and other requirements
- EHS risk registers
- Objectives and Targets, KPI’s and their achievement/completion levels.
- Available Resources
- EHS Audits, internal and external..
- External communications and any complaints.
- Status of corrective actions
- Safety and Environmental performance
Changes to legal or other requirements that relate to SIGM activities and any recommended changes.

**Continuous Improvement**

SIGM has a process for significant projects to be managed that will assist in continues improvement of EHS activities.

**Outcomes/Records:**

Management review minutes for monthly and annual meetings. Action plan additions from the management review meetings if applicable. Continuous Improvement register or equivalent.
## Appendix 1 - Cross Map of EHS Management standards and OHSAS 18001:2007 Elements

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### Appendix 2 - Cross Map of EHS Management standards and ISO 14001:2004 Elements

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