



Karara Mining Limited

Environmental Management Plan

CORP-EN-PLN-1020

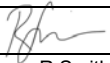
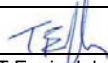
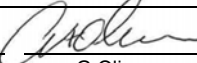
29 June 2020

SYNOPSIS

This document presents the Environmental Management Plan for Karara Mining Limited. The Plan is used to detail the methods, systems and strategies to be implemented for management of the document and data management functions.

“This document has been prepared by Karara Mining Limited for exclusive use (“the Purpose”). Use of this document other than for the Purpose is not permitted.”

CORP-EN-PLN-1020 – KARARA CORPORATE STANDARD

REV	DESCRIPTION	ORIG	REVIEW	APPROVAL	DATE
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1 INTRODUCTION

Karara Mining Limited (KML) is the operating company for Anshan Iron and Steel (Ansteel), owners of the Karara Iron Ore Project (KIOP). Ansteel is listed as China's second largest, and the world's eighth largest, steel producer. The Greater Karara Project (the 'Project'), consists of mine sites, rail, port and associated infrastructure operated by KML. The Project located in the Mid-West region of Western Australia, approximately 225 km east-southeast of Geraldton and 320 km north-northeast of Perth (Figure 1). It is the largest mining operation in the Mid-West region and one of only two operating magnetite mines in WA.

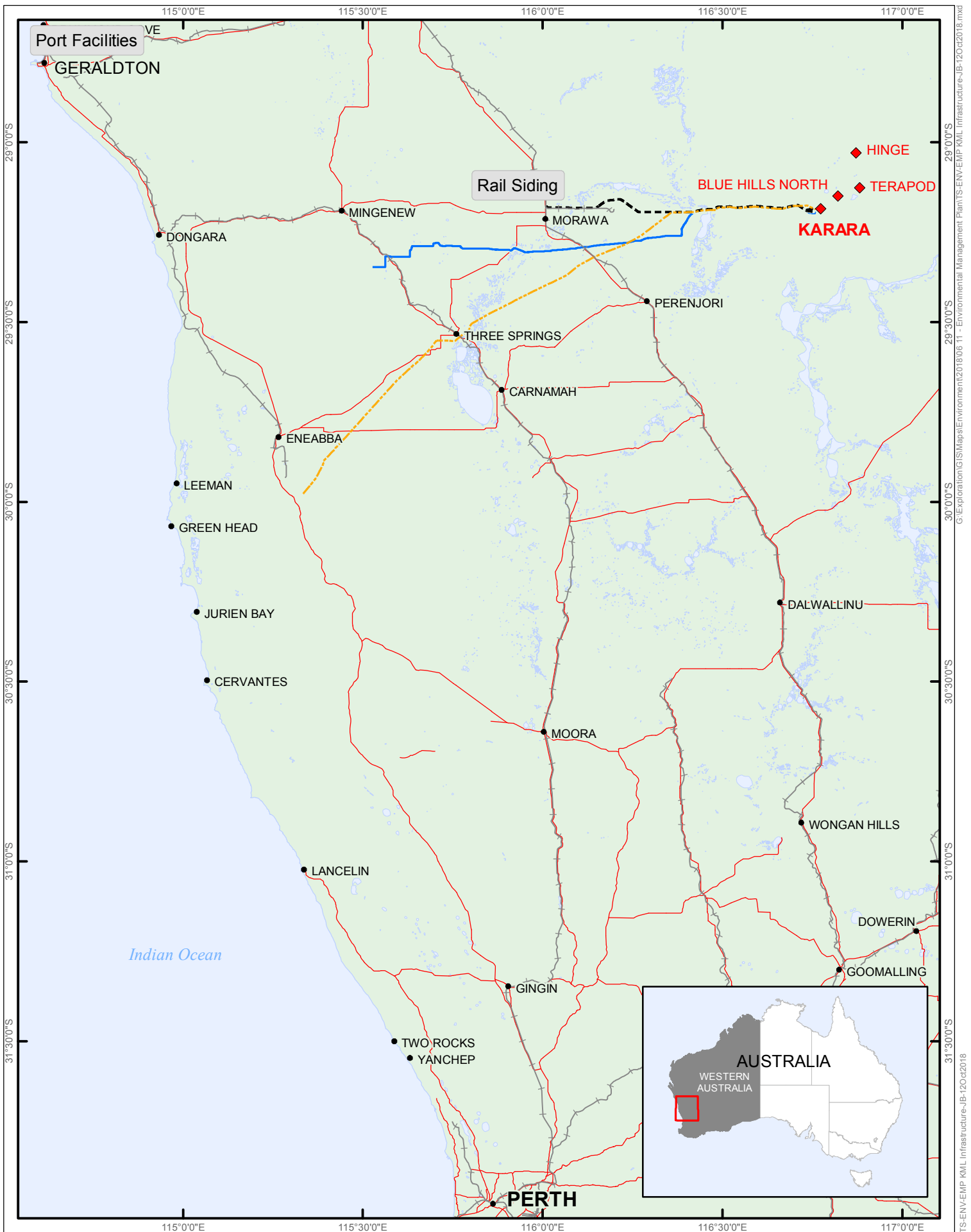
Construction of the Project started in 2009 after all regulatory environmental approvals (Federal, State and Local government) were obtained.

The Project is comprised of three distinct mining projects: the Karara Iron Ore Project (KIOP); the Mungada Iron Ore Project (MIOP) and the Hinge Iron Ore Project (HIOP), as depicted in Figure 1 and described in more detail in Section 2.

Conformance with environmental legal obligations, industry best practice and regulatory guidelines is recognised by KML as a critical component of operations. KML is committed to the highest industry standard of environmental management and will ensure continual improvement in environmental performance over the life of the mine. The KML Environment Management System (EMS) is aligned to meet the requirements of International Standard: AS/NZS ISO14001:2016 Environmental Management System and is integral to ensuring that all relevant legal and other requirements are met with opportunity for continuous improvement.

1.1 Purpose

The purpose of this Environmental Management Plan (EMP) is to detail the framework of the EMS that is designed to ensure that activities carried out by KML and its contractors are systematically assessed, monitored and controlled in order to minimise community and environmental impacts and meet legal and other requirements.

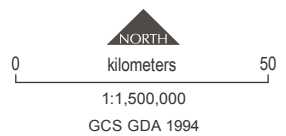


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Environmental Management Plan
Figure 1: Project Location

Legend

- ◆ Mine Site
- Locality
- Railway
- Road
- KML Power Transmission Route
- - - KML Railway Route
- KML Raw Water Pipeline Route
- Waterbody



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1.2 Scope

The Project consists of the KIOP and its associated mining and processing facility, linear infrastructure corridor, and port infrastructure at the Karara Export Terminal (KET). The MIOP and HIOP satellite mines are also addressed by this EMP (Figure 1).

More details regarding these project activities are outlined in Section 2.

A number of mining activities are conducted by third party contractors and are operated in accordance with the relevant contractor's management system. Third party contractor's management systems are required to align with KML's management systems to ensure consistency of approach and outcomes.

Compliance with this EMP is mandatory for all KML personnel, contractors and suppliers whilst on location at the above worksites. Contractors shall ensure their specific EMP or integrated Health and Safety (HS) Management Plan is aligned to meet the requirements of this EMP.

Activities of the Project's operations that are not covered by this document include:

- Exploration - which is covered by the KML Exploration Environmental Management Plan (CORP-EN-PLN-1002); and
- KIOP to KET Rail – which is owned, operated and managed by a third party under appropriate approvals and management plans

1.3 Definitions

Table 1: Definitions

Term	Description
AnSteel	Anshan Iron and Steel Group Corporation
BIF	Banded Iron Formation
CEO	Chief Executive Officer
CRAW	Construction Risk Assessment Workshop
DMIRS	Department of Mines, Industry Regulation and Safety
DBCA	Department of Biodiversity, Conservation and Attractions
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Plan
EMS	Environmental Management System

Filesite	Karara Environmental Management System Filing Location
GIS	Geographical Information System
HIOP	Hinge Iron Ore Project
HS	Health and Safety
InControl, INX	Event and Risk Management
JHA	Job Hazard Analysis
KET	Karara Export Terminal
KIOP	Karara Iron Ore Project
KML	Karara Mining Limited
MIOP	Mungada Iron Ore Project
NEPM	National Environmental Protection Measure
P1, P2, P3	Priority 1, Priority 2, Priority 3
PEC	Priority Ecological Community
SDS	Safety Data Sheet
T	Threatened
TDS	Total Dissolved Solids
TSF	Tailings Storage Facility
WA	Western Australia

2 PROJECT DESCRIPTION

As outlined above, this EMP applies to three distinct mining projects: KIOP; MIOP; and HIOP and associated infrastructure (Figure 1).

2.1 Mining Areas

2.1.1 Karara Iron Ore Project

KIOP is a magnetite mining and processing operation with a project life of at least 40 years, based upon an estimated magnetite reserve of 497 million tonnes. Mining commenced in 2010 and consists of an open cut mining pit, a processing plant, accommodation facilities, and a Linear Infrastructure Corridor (LIC) containing the raw water pipeline towards the Yandanooka Borefield and access road to Morawa.

2.1.2 Mungada Iron Ore Project

MIOP was a hematite mining operation which encompassed four open cut pits in two areas (Blue Hills North and Terapod). Active mining operations at Blue Hills North ceased in July 2013 and mining ceased at Terapod in March 2014. Parts of MIOP have been rehabilitated, however infrastructure remains in place to support KIOP operations, such as laydown areas, turkey's nests and water pipelines. These continue to operate and support the long term KIOP mining operations.

2.1.3 Hinge Iron Ore Project

HIOP was a hematite mining operation comprised of an open cut mining pit and an on-site crushing and screening facility. Active mining operations ceased in January 2016, with the project continuing to progress its rehabilitation process. Rehabilitation earthworks and revegetation have been completed, with the exception for infrastructure supporting KIOP operations, such as laydown areas, water pipelines, Run of Mine (ROM) pad and haul roads to allow for recommencement of mining activities.

2.2 Mined Products

2.2.1 Hematite

The Project's hematite orebodies are primarily mined, crushed and screened at KML by independent contractors. The sources of hematite ore are primarily from the satellite mine sites at HIOP and MIOP. The final hematite product is transported from the KIOP rail load out facility to the KET at Geraldton Port via a rail spur to the existing third party operated rail network. It is then unloaded and stored at the KET and loaded into vessels for export. As at June 2020 no Hematite production was occurring within the project.

2.2.2 Magnetite

The Project's magnetite ore is mined from KIOP then undergoes a concentration process at the Beneficiation Plant located at the KIOP mine site to produce final high-grade magnetite iron concentrate. The magnetite concentrate is transported in a similar manner as the hematite product to the KET at Geraldton Port before it is exported.

2.3 Supporting Infrastructure

The infrastructure to support mining operations, including satellite mines of the Project, includes:

- Karara Export Terminal (KET) at Geraldton Port, consisting of ore storage and ship loading facilities;
- Tilley to Karara Rail spur which connects the mine to the existing third party railway;
- A below ground raw water pipeline from the Yandanooka Borefield (located 20 km south of Mingenew) to the Karara mine site;
- A transmission line (330 kV) connecting KIOP to the South West Interconnected System;
- Crushing and screening plants, concentrators, beneficiation plant to process hematite and magnetite ore;
- Designated waste rock dump/dumps to contain waste rock materials;
- A Tailings Storage Facility (TSF) that contains both wet and dry tailings, with the final landform being a single dry stack TSF;
- An aerodrome;
- An access road to Morawa (being Mungada Road) and minor access roads; and
- Accommodation village.

3 DESCRIPTION OF ENVIRONMENT

The mining activities of the Project are located on unallocated crown land (formerly pastoral leases) that is managed for the purpose of conservation by the Department of Biodiversity, Conservation and Attractions (DBCA). Mining activities occur predominantly on Banded Ironstone Formation (BIF) ridges within a generally topographically subdued landscape. The climate is described as 'Extra Dry Mediterranean' typically expecting seven to eight months of dry weather annually with cold wet winters (Payne *et al.*, 1998).

The KET is located within the City of Geraldton within the Mid-West Port Authority operational licenced area.

3.1 Geology

The Project's iron ore deposits are located within the Windaning formation and is part of the Yalgoo-Singleton Greenstone belt. The jaspilitic BIF's comprise of red jasper bands interlaid with grey to black hematite and/or magnetite-rich bands with white chert bands.

3.2 Hydrogeology

The Project is located within the Mullewa/Byro sub-area of the proclaimed Gascoyne groundwater area. Groundwater elevation ranges from 2.7 to 24.4 metres below ground level depending on surface elevation.

The groundwater within the Project area is variable, ranging from fresh (<1,000 mg/L TDS) to hypersaline (> 100,000mg/L TDS). Groundwater users within the area are underlying pastoral lease station holders and third party mining operators.

KML sources the majority of water for processing and potable water from Yandanooka bore field in the Mingenew sub-area of the proclaimed Arrowsmith Groundwater Area. This water supply is sourced from the Leederville-Parmelia aquifer.

KML maintains multiple ground water licences within the Project area for the purpose of processing, dust suppression and general mining operations.

3.3 Ecology

Mining operational areas of the Project are located in the Yalgoo bioregion (Interim Biogeographic Regionalisation of Australia Classification) occurring in Bioregion group 2 as listed by the Department of Water and Environmental Regulation (DWER). The vegetation and habitat within mining areas of the Project area is generally in good condition with evidence of past grazing, with a total of 23 Floristic Community Types recognised. These are broadly categorised by three super groups: Eucalyptus woodlands and Acacia shrub lands on flat outwash and valley areas; Woodlands and shrub lands on rocky BIF on crests to lower slopes; and Acacia shrub lands with emergent Eucalyptus on slopes with lateritic gravels.

The Blue Hills/Mungada/Karara Priority Ecological Community (PEC) status has been allocated over woodland and shrub land communities on lower slopes to crests on rock BIF and granite substrates.

Several Threatened (T) and priority (P1 and P3) flora species are located within the Project area:

- *Acacia woodmaniorum* (T);
- *Stylidium scintillans* (T);
- *Acacia karina* (P1);
- *Lepidosperma* sp. *Blue hills* (P1);
- *Millotia dimorpha* (P1);
- *Gunniopsis divisa* (P3);
- *Melaleuca barlowii* (P3);
- *Micromyrtus acuta* (P3);
- *Persoonia pentasticha* (P3); and
- *Rhodanthe collina* (P3).

Twenty six weed species were identified across the Project survey area. Of these, two are listed under the *Biosecurity and Agriculture Management Act 2007* and are present within the mine site area:

- “Pattersons Curse” or “Salvation Jane” (*Echium plantagineum*); and
- “Cleavers” or “Goosegrass” (*Galium aparine*).

Ten vertebrate species and two invertebrate species of conservation significance have been recorded within the Project area. Of these, three species are listed as Schedule 1 (Vulnerable) under the *Biodiversity Conservation Act, 2016*:

- Malleefowl (*Leipoa ocellata*);
- Western Spiny-tailed Skink (*Egernia stokesii badia*); and
- Shield-backed Trapdoor Spider (*Idiosoma nigrum*).

It should be noted that the systematics of the shield backed trapdoor spiders has recently been formally revised (Rix et al, 2018). As a result, the spider species identified in the Project area has been re-classified as the Northern Shield-backed Trapdoor Spider (*Idiosoma clypeatum*). This species is listed as non-threatened ‘Priority 3’ under the Biodiversity Conservation Act, 2016.

Feral fauna including foxes, cats, goats and rabbits are present within the Project area. Subterranean fauna have not been identified within the mine site area.

3.4 Community

KIOP is located entirely within unallocated Crown Land, managed by DPAW. Infrastructure supporting KIOP passes through a number of wheat and sheep farms.

There are no registered native title claims over the minesite area, however there is one unregistered claimant - the Widi Mob (unregistered WAG6193/98; WC97/072). The native title claimant group, Badimia (registered WAS6123/98; WC96/098) overlays a small section of the Silverstone water pipeline. The native title claims that cover the areas crossed by the LIC are Amangu (registered WAD6002/4; WC04/2), Mullewa Wadjari (registered WAD6119/98; WC96/93) and the Widi Mob (unregistered WAG6193/98; WC97/072).

The adjacent shires of Morawa and Perenjori are predominantly agricultural with relatively low population. Morawa is relatively self-sufficient in terms of basic retail, health, education and financial services. It has medical facilities, primary and secondary schools, banks, supermarkets, a small range of retail outlets and services and some industrial services. In comparison, Perenjori has fewer facilities and relies on neighbouring towns for several services, including secondary schooling and full-time medical services.

3.5 Heritage

In addition to desktop research, numerous archaeological and ethnographic surveys have been conducted in the vicinity of KIOP. Archaeological sites (rock shelter, artefacts, quarries, modified trees, scatter, ochre source) have been identified in the vicinity of the minesite, as well as ethnographic sites, underpinned by mythological stories that are important to the Aboriginal representatives. Overall, the archaeological conclusions suggest that this area does not appear to have supported much occupational activity or prolonged habitation. This can be partly explained by the lack of permanent water sources; however, an absence of archaeological or ethnographic research in the Mid-West makes it difficult to contextualise these findings. Previous surveys and identified sites indicate that Mt Karara is a place of ethnographic focus for the Widi Mob, however little archaeological material has been located across this feature.

A European cultural heritage impact assessment for KIOP revealed that no site of European heritage significance was found within the minesite area. However, Rabbit Proof Fence No. 1 (Database Number 12080) was identified along the LIC. The Rabbit Proof Fence was erected in 1901 to protect agricultural land from rabbits, and is the longest fence in the world.

4 CONTRACTOR REQUIREMENTS

All contractors must comply with the requirements of this EMP and related procedures and documents. Contractors may develop their own EMP (or integrated HSE Plan) that addresses environmental risks specifically related to their scope of work. These contractor documents shall, as a minimum, align with the requirements of this EMP.

A copy of the Contractor's EMP (or integrated HSE Plan) shall be submitted to the KML Environmental and Community Department for review and approval prior to the contractor mobilising to site. In addition, the contractor shall complete a Construction Risk Assessment Workshop (CRAW) prior to mobilising to site (as per KML OH&S Risk Management Procedure (CORP-HS-PRO-1041)). The CRAW shall identify key risks and actions to be completed prior to attending site.

Should any conflict be identified between the Contractor's EMP, the CRAW and other Project related documents or requirements, it shall be addressed by the relevant KML Area Manager in consultation with the KML Manager Environment and Communities.

Contractors are expected to be experienced and aware of the environmental issues that specifically relate to their work area and are required to have a working knowledge of the Contractor EMP (or integrated HSE Plan) and this EMP, and associated procedures. Contractor companies shall ensure their managers, supervisors and other relevant staff have had applicable training in the Contractor EMP (or integrated HSE Plan) and this EMP, and related procedures.

The contractor shall ensure a competent person is on site at all times to manage environmental issues whilst work is in progress.

Contractors and suppliers are required to confirm goods and services conform to environmental legislation, accepted standards, relevant codes of practice, this EMP and related procedures.

All spatial environmental data will be provided to KML in accordance with the Index of Biodiversity Standards Australia standards.

5 ENVIRONMENTAL MANAGEMENT SYSTEM

This EMP has been developed in accordance with AS/NZS ISO 14001:2016 “Environmental Management Systems” and provides a summary of the EMS and operational controls associated with environmental practices at KML.

The EMS is made up of high level policy statements, and is supported by plans, procedures, lists and other documents. Implementation of the EMS provides a framework to manage and minimise environmental impacts, continually improve environmental performance and meet all legal requirements and commitments for the Project. Section 6 of this document details the Planning aspects of KML’s management system, whilst Section 7 details the Implementation and Operation aspects.

5.1 Environmental Policy

KML maintains a documented Environmental Policy CORP-EN-POL-1001 (the ‘Policy’). The Policy applies to all aspects of the Project and applies all contractors and employees. The Policy is endorsed by KML’s Chief Executive Officer (CEO) and is reviewed biennially to ensure it remains relevant to the business.

The Policy shall be communicated and made available to all stakeholders as part of the KML Site Induction. Copies of the Policy shall also be displayed in prominent locations including HS notice boards. It is also available on the KML website (www.kararamining.com.au).

5.2 Community and Heritage Policy

KML also maintains a documented Community and Heritage Policy CORP-CH-POL-1004 which applies to all aspects of the Project, and shall be applied by all contractors and employees. The Community and Heritage Policy outlines how KML will identify and work with communities that may be affected by KIOP operations.

5.3 Management System Documents

Environmental and Community/Heritage Plans, Procedures, Forms and Registers have been developed by KML to detail the objectives, management actions, performance indicators, monitoring and reporting requirements for the environmental and community/heritage risks associated with operational activities.

The scope, detail and number of these controlled documents may be modified in relation to corrective and preventative actions, incidents, leading practice, changing regulations or regulatory guidance notes. Compliance with all KML Environmental and Community/Heritage Plans and Procedures is mandatory.

The current list of KML Environmental and Community/Heritage controlled documents (ie policy, plans, procedures and lists) are listed in Appendix A.

Other non-controlled Environment and Community Department documents are stored within the KML Filesite document management system. Access to documents on Filesite are access controlled and monitored.

5.4 Supporting Documentation

Table 2 below provides a summary of other documentation implemented by KML that may interface with this EMP. There are a number of KML environmental plans and associated procedures that form part of this EMP.

Table 2: Karara documentation supporting the EMP

Documentation	Interface with this EMP
KML Community Plan - Stakeholder Engagement Plan CORP-CH-PLN-1002	To ensure effective engagement with local communities, government and other key stakeholders during project operations, as outlined in Section 7.3.2.
KML Health and Safety Plan – Emergency Response Plan CORP-HS-PLN-1003	Outlines the plan for emergency response at Karara mine site (refer to Section 7.5 of this document)
KML Health and Safety Plan – Crisis Management and Recovery CORP-HS-PLN-1004	Outlines the plan for crisis management in the event of a significant incident at the Karara mine site (refer to Section 7.5 of this document).
KML Health and Safety Procedure – Incident Management Procedure CORP-HS-PRO-1046	Reporting of environmental incidents (refer to Section 8.5 of this document.
KML Health, Safety and Environment Management Plan – Karara Export Terminal CORP-PT-PLN-1007	Outlines how HSE is managed at the KET.

6 PLANNING

6.1 Environmental Risk Register

The KML Environmental Risk Register CORP-EN-LST-1002 has been developed for the Project to identify the significant environmental risks applicable to all Project activities and assess their significance. The KML Environmental Risk Register CORP-EN-LST-1002 shall be reviewed annually to reflect changes in legal requirements, in response to incidents, changes in Project scope, and findings of inspections, audits and management reviews.

Risk assessments (via a CRAW) shall be undertaken to identify and evaluate environmental risks for each contractor, prior to their mobilisation to site as described in Section 4.

At a task level, Job Hazard Analysis (JHA) shall be used by all personnel to identify potential environmental risks and appropriate control measures prior to the commencement of any non-standard task they may cause environmental harm. A JHA shall be completed in accordance with KMLs Health and Safety Procedure - Job Hazard Analysis CORP-HS-PRO-1020.

Key environmental aspects and risks associated with KIOP operations include:

- Dust;
- Waste;
- Potentially Acid Forming (PAF) Material Management;
- Hydrocarbon, Chemical, and Spill Management;
- Impacts to flora (including Conservation Significant Flora);
- Ground Disturbance
- Impacts to fauna (including Conservation Significant Species); and
- Water Management;

KML has developed plans and procedures to ensure these aspects and risks are managed. Details regarding management of these aspects and risks are summarised in Appendix B.

6.2 Legal and Other Requirements

KML shall comply with all relevant Federal, State and Local Government environmental requirements. Copies of relevant licences, approvals and permits shall be maintained. A summary of the relevant environmental legislation pertaining to the Project is maintained in the Environmental Legal and Other Obligations Register CORP-EN-LST-1003 within the EMS Filesite folder and is available on the KML Portal.

In addition to the Environmental Legal and Other Obligations Register CORP-EN-LST-1003, the Environment and Communities Department maintains an Obligations Register which summarises all conditions and commitments from approvals and licences. The Obligations Register is filed on Filesite.

All KML employees have access to up to date legislation through the EnviroLaw and SafetyLaw website, which can be accessed via the KML Portal (<http://portal/Pages/Applications.aspx>). Access to the KML Portal website is given automatically to all KML employees at the commencement of their employment. KML also has a contract with a specialist third party company to advise KML of any updates to relevant legislation. KML also has access to relevant Australian Standards.

The Principal Advisor – Approvals and Compliance is accountable for reviewing these updates for their applicability to the Project and updating management system documents as required.

6.3 Performance Objectives and Targets

KML has documented environmental objectives, targets, measures and responsibilities for the Project within the KML Environmental Report – Environmental Objectives and Targets CORP-EN-REP-1005. These have been aligned with the KML Environmental Policy, Community and Heritage Policy, and the significant environmental risks that have been identified for KML operations. Performance against environmental objectives and targets are, depending on their nature, reviewed monthly, quarterly or annually (as specified in CORP-EN-REP-1005). The objectives and targets shall be reviewed on an annual basis and updated based on factors such as company performance, changes in legislation and technological improvements.

7 IMPLEMENTATION AND OPERATION

KML shall ensure that the significant environmental and community aspects associated with its operations are managed in accordance with KML's Environmental Policy, Community and Heritage Policy and the Environmental and Community Objectives and Targets.

7.1 Resources, Roles, Responsibilities and Authorities

The application of all KML environmental management practices outlined in this EMP are the responsibility of all personnel and contractors, however the overall responsibility for the implementation of this EMP rests with the KML CEO. Management actions stated in the EMP may be delegated by KML to specific contractors.

Key Project personnel including the Managers, Superintendents and Supervisors shall ensure that all management actions are undertaken to a satisfactory standard and that all personnel are aware of their responsibilities with respect to environmental matters. There shall be dedicated contractor and KML staff to manage environmental issues during operations. A general outline of responsibilities in relation to environmental management is provided in Table 3 below:

Table 3: Roles and Responsibilities

Relevant Role	Responsibility
KML CEO	<ul style="list-style-type: none"> • Overall accountability for the environmental management of the project; • Implementation of the KML Environmental and Community and Heritage Policies.
Registered Manager	<ul style="list-style-type: none"> • Support KML and contractor personnel in the implementation of this EMP • Ensure that adequate resources including competent personnel are available and processes are in place for the achievement of environmental objectives • Actively promote environmental excellence and visibly demonstrate the implementation of this EMP
General Manager Operations	<ul style="list-style-type: none"> • Support KML and contractor personnel in the implementation of this EMP • Ensure that adequate resources including competent personnel are available and processes are in place for the achievement of environmental objectives • Actively promote environmental excellence and visibly demonstrate the implementation of this EMP

<p>General Manager People and Organisation</p>	<ul style="list-style-type: none"> • Allocate resources and assign responsibilities for the implementation, operation and ongoing improvement of the KML environmental management processes including all requirements of this EMP; • Ensure that adequate resources including competent personnel are provided and processes are in place for the achievement of environmental objectives; • Actively promote environmental excellence and visibly demonstrate the implementation of this EMP; • Monitor, review and report on environmental performance as required, to the KML senior management.
<p>KML Area Managers</p>	<ul style="list-style-type: none"> • Ensuring all personnel are inducted, made aware of the requirements of this plan and related procedures prior to commencement of work and are provided with support; • Ensuring the requirements of this EMP are implemented within their area and ensuring all employees and contractors comply with the EMP.
<p>KML Manager - Environment and Communities</p>	<ul style="list-style-type: none"> • Overall responsibility for development, implementation, maintenance and compliance with the KML EMS and this EMP; • Report to Senior Management on matters of environmental compliance and legal requirements; • Overall responsibility for development, implementation, maintenance and compliance with the EMP and the EMS; • Overall responsibility to ensure that KML meets legal environmental requirements and obligations; • Overall responsibility to ensure that KML can meet its environmental objectives and targets; • Overall responsibility to ensure that KML manages operations in a manner that reduces environmental risks; • Provide advice and support to the Area Managers and Contractor Managers to ensure compliance with legal requirements, achievement of environmental objectives, and improving environmental performance; • Review effectiveness and implementation of the KML EMS and this EMP;

	<ul style="list-style-type: none"> • Ensure KML HSE and environmental risk management processes are effectively implemented so that environmental risks and opportunities are identified and managed; • Ensure contracts contain relevant environmental provisions ; • Facilitate environmental auditing and compliance monitoring as required.
KML Environment and Community Department	<ul style="list-style-type: none"> • Undertake environmental compliance activities; • Coordinate the delivery of environment and community training to key personnel; • Provide environment and community advice and assistance to personnel as required; • Liaise with Supervisors and Managers to identify and rectify operational environmental issues; • Implement the environmental inspection and audit schedule and oversee the closeout of associated corrective and preventative actions; • Facilitate environmental monitoring; • Assist with investigation of environmental incidents and co-ordination of corrective actions, as required; • Facilitate environmental data provision by line managers / supervisors for environmental compliance reporting; • Maintain all documentation (hard copy files and/or electronic files) for auditing purposes; • Compile environmental data for internal and external reporting; • Undertake all external reporting requirements.
KML Principal Advisor Communities and Heritage	<ul style="list-style-type: none"> • Administer and manage the stakeholder engagement programme; • Manage expectations among communities and other stakeholders and mediate conflict resolution; • Document stakeholder communications.
KML GIS Coordinator	<ul style="list-style-type: none"> • Receive spatial coordinates for all data required to be maintained as part of this plan and associated procedures on the KML GIS Database.

	<ul style="list-style-type: none"> Periodically review and update the KML GIS Database and ensure its relevancy.
Contractors	<ul style="list-style-type: none"> Overall responsibility for the implementation of the contractor's EMP and associated procedures; Ensure key personnel are appointed for the proper performance of the services under their contractual obligations; Ensure that employees, agents and subcontractors comply with all environmental laws which apply to its services; Ensure compliance with all environmental guidelines, rules and procedures relevant to KML sites; Report Monthly to the KML Environment and Community Department inclusive of data collection requirements and environmental performance. Conduct environmental training to contractor personnel and ensure that all components of the EMP are understood and adhered to; Undertake environmental inspections and audits of the workplace; Investigate environmental incidents and co-ordinate corrective actions under consultation from the KML Environment Department.
KML Employees and Contractor Staff	<ul style="list-style-type: none"> Comply with the requirements of the EMP and related procedures; Report all environmental incidents as they occur; Participation in environmental training, meetings or audits as required.

7.2 Competence, Awareness and Training

7.2.1 Induction

All site personnel, both mine site and port, are required to undertake the KML induction before they commence work as per the KML Training Procedure – Induction Procedure KML-TR-PRO-1003. The induction includes: roles and responsibility; duty of care; conformance with the Environmental Policy, the Community and Heritage Policy and the EMS; potential impacts associated with tasks; and the benefits of improved environmental performance. The induction shall be periodically reviewed to capture significant changes in environmental conditions or requirements. Contractors with their own site specific inductions shall include these requirements within their own induction program. Follow up inductions shall occur every second year to ensure ongoing compliance with this document.

7.2.2 Training

The KML Safety Department maintains a training matrix for both the Safety Department and the Environment and Community Department, filed on Filesite. This matrix lists all training required for each position, and lists status against each requirement.

Environmental training on site includes conducting awareness training, environmental toolbox meetings and ground disturbance training. Records of environmental training are maintained by the Environment and Community Site Team and filed on Filesite.

7.3 Communication

7.3.1 Internal Communication

Forums for internal communication of environmental information and discuss environmental issues relating to the Project include:

- Senior Leadership Meetings;
- Weekly, monthly and quarterly performance reporting;
- Contractor toolbox meetings;
- Environmental incident reporting;
- Site Bulletins;
- Environmental training packages; and
- Site notice boards.

Environmental issues that require actioning or a wider management strategy will be communicated via:

- Monthly environmental reporting;
- Environmental site inspections and audits;
- KML Environment/Compliance meetings; and
- KML Incident and Corrective Action management via InControl.

7.3.2 External Communication

Communication of environmental information between key stakeholder groups is undertaken in accordance with the KML Community Plan - Stakeholder Engagement Plan CORP-CH-PLN-1002. Key stakeholder groups include regulators, employees, local communities, land owners, contractors, service providers, shareholders and industry. Feedback will be sought from stakeholders on a regular basis and considered in environmental management. The KML Community Plan - Stakeholder Engagement Plan CORP-CH-PLN-1002 details the relevant KML department responsible for external communication.

The KML Environment and Community Department is responsible for all environment related external communication with stakeholders. This includes, but is not limited to, communications with government agencies (e.g. external reporting of incidents) and local communities. All community or regulatory queries or complaints received shall be directed by Supervisors and Managers to the KML Manager Environment and Communities who will ensure these queries and complaints are followed up and closed out. The Principal Advisor Communities and Heritage will in most cases be delegated responsibility for managing community engagement and complaints.

Any communication with the media will be directed to the KML General Manager People and Organisation.

7.4 Document Control

Environmental and Community/Heritage Plans, Procedures, Forms and Registers have been developed by KML to detail the objectives, management actions, performance indicators, monitoring and reporting requirements for the environmental and community/heritage risks associated with operational activities.

These EMS documents are 'controlled documents' and are developed, reviewed and managed as per the Document Development and Review Procedure (CORP-EN-PRO-1049). EMS documentation shall be approved and signed off by the Manager Environment and Communities or delegate prior to issue. Once developed and reviewed, these EMS documents are managed in accordance with the KML Document and Data Management Plan CORP-GE-PLN-1002. Controlled documents are stored in iManage Filesite and published on the KML portal, which can be accessed by all employees.

Access to controlled documents by third party contractors is managed via provision of specific documents on the iManage Share platform that allows the Environment and Community Department to share relevant files externally.

The current list of KML Environmental and Community/Heritage controlled documents (i.e. policy, plans, procedures and lists) and other key KML documents relevant to this Plan are listed in Appendix A.

Other non-controlled documents are stored within the KML Filesite document management system. Access to documents on Filesite are access controlled and monitored.

7.5 Emergency Preparedness and Response

The response procedures required in the case of an environmental emergency are described in the KML Health and Safety Plan - Emergency Response Plan CORP-HS-PLN-1003, the KML Health and Safety Plan - Crisis Management and Recovery Plan CORP-HS-PLN-1004 and the KML Health and Safety List – Emergency Contact List CORP-HS-FRM-1095. These documents cover:

- Relevant Roles and Responsibilities;
- Response and Recovery procedure; and
- Communication procedure including Emergency On-site and off-site contact numbers.

KML maintains appropriate emergency response equipment and materials onsite, which are periodically inspected and tested to ensure that they are maintained in a working order.

Environmental incidents shall be reported as per the KML Health and Safety Procedure - Incident Reporting and Analysis CORP-HS-PRO-1046, which includes information on required external reporting and associated reporting timeframes (see section 8.5.1).

8 CHECKING

8.1 Monitoring and Measurement

Environmental monitoring required under various permits, approvals and licences is detailed in the environmental procedures supporting this EMP. Table 4 details monitoring activities which are required over KML operations sites in accordance with licences and approvals:

Table 4: Monitoring Activities and Durations

Activity	Duration	Procedure
Vegetation Health Monitoring	Annually	KML Environmental Plan - Flora and Vegetation Health Monitoring CORP-EN-PLN-1012
Rehabilitation Performance Monitoring	Annually	KML Environmental Procedure – Rehabilitation Performance Monitoring CORP-EN-PRO-1040
Dust Deposition Monitoring	Monthly	KML Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005
Western Spiny-tailed Skink Monitoring	Annual	KML Environmental Procedure – Western Spiny-tailed Skink Management and Monitoring CORP-EN-PRO-1024
Shield-backed Trapdoor Spider Monitoring	Annual (Under review)	KML Environmental Procedure – Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025
Malleefowl Monitoring	Annual	KML Environmental Procedure – Malleefowl Management and Monitoring CORP-EN-PRO-1035
TSF Water Monitoring Bores	Monthly and Biannual	Monitoring of TSF Bores Work Procedure EN-SWP- 008
Waste Water Treatment Plant Water Monitoring	Quarterly	KML Environmental Procedure – Waste Water Treatment Plant Discharge Sampling and Monitoring CORP-EN-PRO-1019

The monitoring schedule is maintained within the KML Environmental Operations Workload Plan filed on Filesite. All monitoring data is entered into associated electronic data registers and retained within the KML EMS management system on Filesite.

Any breach or exceedance of KML internal or external trigger or threshold values will be entered into InControl as an environmental hazard or incident and reported as required (as per the Incident Management Procedure CORP-HS-PRO-1046. Refer to section 8.3).

8.2 Audit and Compliance

KML shall demonstrate that it has evaluated compliance with both external requirements, such as conditions of ministerial statements, licences and permits, as well as internal requirements, such as compliance with KML procedures. The Manager Environment and Communities shall ensure that evaluation of compliance is undertaken as required.

8.2.1 Internal Audits and Inspections

Compliance audits of the Project, including contractor activities, shall be conducted by the KML Environment and Community Department as per the KML Environmental Procedure – Compliance Auditing CORP-EN-PRO-1006.

Project audits and inspections shall be conducted according to KML Environment and Community Department inspection and audit schedules (filed on Filesite). The audit and inspection schedules shall be maintained by the KML Environmental and Communities Department, and will detail proposed dates for the audits and inspections at required work sites across the Project and the personnel involved in the audits and inspections. The audit and inspections schedules will be risk based and higher risk activities will be the subject of increased audit and inspection.

Environmental audits and inspections will include:

- Area and task specific inspections – these will typically be documented using inspection checklists.
- KML EMS audits – these will be documented in audit reports.
- Audits against our legal obligations to ensure compliance.
- Contractor EMS audits (for major contractors only) – these will be documented in audit reports.
- Ad hoc audits requested by KML or the KML contractor – these shall be documented as best fits to suit the scope and intended outcomes of the audit.

The findings of compliance audits shall be recorded in InControl and will include allocation of actions to responsible persons and agreed timeframes for the implementation of corrective actions. Actions will be tracked to close-out via InControl.

8.2.2 Contractor Audits and Inspections

Contractors shall conduct environmental (or combined health, safety and environmental) inspections at regular intervals. This interval shall be detailed in the Contractors Environmental Management Plan. Records of contractor inspections will be maintained onsite.

Contractors shall submit copies of completed audit and inspection forms to the KML Environment Department.

8.2.3 External Audits

External audits and inspections of KML Operations may be conducted by government agencies to ensure compliance with KMLs regulatory environmental obligations. For such audits and inspections, a representative from KMLs Environment and Community Department shall accompany the auditors at all times.

The findings and recommendations arising from external audits shall be recorded in InControl and managed to close out in agreed timeframes.

8.3 Compliance Reporting

8.3.1 Internal Compliance Reporting

The Manager Environment and Communities shall report to the CEO on a monthly basis all incidents reported associated with environmental events recorded in InControl.

The KML Environment and Community Department shall undertake a monthly review of KMLs compliance. The monthly review shall include, as a minimum, a review of:

- Monitoring – compliance with monitoring requirements and results of monitoring;
- Compliance with Objectives and Targets;
- Incident reports; and
- Overdue Actions.

The evaluation of compliance shall be stored within the EMS management system under 5.2 (Internal Communications).

KML Environment and Community Department shall periodically review the process used to evaluate compliance with legal requirements.

8.3.2 External Compliance Reporting

External reports are compiled and submitted as required by various regulatory requirements. The approvals and compliance Workload Plan (located on Filesite) lists all required external reports and due dates.

The KML Environmental Form - Environmental Contractor Monthly Report CORP-EN-FRM-1001 shall be completed and submitted to the environmental mailbox (environment@kararamining.com.au) each

Month by the Contractor HSE representative or delegate whilst operating on the Project. The Report template is issued by the KML Environment and Community Department to the Contractor. The KML Environment and Community Department shall collate the data reported by all contractors on an annual basis.

8.4 Performance review

KML Environment and Community Department shall prepare an EMS Management Review annually to provide to KML Senior Management to ensure its continuing suitability, adequacy and effectiveness. The review shall be coordinated by the Manager Environment and Communities and assess opportunities for improvement and the need for changes to the EMS, including the Policy and objectives and targets. The inputs into management review shall include:

- Performance against agreed Environmental Objectives and Targets (CORP-EN-REP-1005)
- Results of internal audits and evaluations of compliance with legal requirements and with other requirements;
- Communications from external interested parties, including complaints;
- Environmental monitoring results;
- Status of corrective and preventative actions;
- Follow up actions from previous management reviews;
- Relevant EMS documentation;
- Changing circumstances, including developments in legal and other requirements related to environmental risks; and
- Recommendations for improvement.

The outputs from management reviews shall be documented and will include any decisions and actions related to possible changes to the Policy, objectives, targets or this EMP's consistent with the commitment to continual improvement. A copy of the final documented management review shall be sent to departmental managers to be communicated to their respective groups.

8.5 Incidents, Preventative and Corrective Actions

8.5.1 Incident Reporting and Investigation

An environmental incident is defined as:

- An unplanned event that causes environmental impacts or harm;
- Accidental or intentional events involving non-compliance with approval conditions or commitments;
- Hazards and near-miss events which may have resulted in an environmental impact; and;

- Accidental or intentional events that cause harm to conservation significant flora and fauna.

The purpose of incident reporting and investigation is to identify the root cause and implement controls to prevent recurrence of the incident.

The KML Health and Safety Procedure - Incident Management (CORP-HS-PRO-1046) outlines the requirement for reporting and investigating health, safety and environmental incidents. All incidents are entered into InControl, categorised and investigated as outlined in the KML Health and Safety Procedure - Incident Management CORP-HS-PRO-1046.

Significant environmental incidents (ie incidents that are classified as having 'major' or 'catastrophic' consequences as per the Environmental Consequence Criteria Matrix (CORP-EN-LST-1004) are also required to be reported to government agencies. These external reporting requirements, including reporting timeframes, are outlined in the Incident Management Procedure (CORP-HS-PRO-1046).

8.5.2 Corrective and Preventative Actions

Corrective and Preventative actions may be generated from a number of sources, including but not limited to incidents, audits, inspections and management reviews. Corrective actions shall be systematically managed to ensure issues raised are recorded and closed within a specified timeframe.

KML utilises InControl for recording all preventative and corrective actions raised and closeout details shall be maintained. The close out details shall include the date closed and the name of the person verifying completion of the required action.

8.6 Control of Records

Records may arise from many sources such as environmental monitoring, meetings, audits and inspections. All records shall be stored within InControl and/or the EMS Filesite management system in the appropriate file.

Records shall be legible, identifiable and traceable to the activity that they relate to. All records are protected and can only be accessed by authorised personnel. The system is backed up in accordance with the KML Archiving Procedure CORP-GE-PRO-1009.

InControl will be utilised to maintain records of obligations, audits, stakeholder consultation, corrective actions, incidents and investigations.

Spatial data will be stored and updated using ArcGIS. Records such as monitoring and survey results, area cleared and area rehabilitated shall be sent to the KML GIS Coordinator for upload into ArcGIS in accordance with the KML Environmental Procedure – Environmental and Heritage Data Management CORP-EN-PRO-1045, and the KML Environmental Procedure – Approval Requests and Ground Disturbance CORP-EN-PRO-1004.

KML Departments and Contractors are required to forward all ground disturbance records generated to the KML Environment and Community Department on a monthly basis via email (environment@kararamining.com.au).

8.7 Review of the Environmental Management Plan

The Manager Environment and Communities shall ensure that this EMP is reviewed every two years, as per the Master Document Schedule (filed on Filesite).

9 REFERENCES

Department of Water (2006), *Water Quality Protection Note (WQPN) 68 Mechanical Equipment Wash-down*. Western Australian Government.

Standards Australia, (2017) AS 1940-2017, *The storage and handling of flammable and combustible liquids*, Standards Australia.

Rix, M G, Huey, J A, Cooper, S J B, Austin, A D and Harvey, M S, 2018. Conservation systematics of the shield-backed trapdoor spiders of the nigrum-group (Mygalomorphae, Idiopidae, Idiosoma): integrative taxonomy reveals a diverse and threatened fauna from south-western Australia. *ZooKeys* 756: 1-121.



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APPENDIX A – ENVIRONMENT AND COMMUNITY CONTROLLED DOCUMENTS

KML Environmental Controlled Documents

KML Environmental Policies	Document Number
KARARA ENVIRONMENT POLICY	CORP-EN-POL-1001
KML Environmental Plans	Document Number
EXPLORATION ENVIRONMENTAL MANAGEMENT PLAN	CORP-EN-PLN-1002
MALLEEFOWL AND WESTERN SPINY-TAILED SKINK RESEARCH PLAN	CORP-EN-PLN-1004
WOODMANIORUM TRANSLOCATION PROPOSAL PLAN	CORP-EN-PLN-1007
FAUNA MANAGEMENT PLAN	CORP-EN-PLN-1008
DUST MANAGEMENT PLAN	CORP-EN-PLN-1010
FLORA AND VEGETATION MANAGEMENT PLAN	CORP-EN-PLN-1011
FLORA AND VEGETATION HEALTH MONITORING PLAN	CORP-EN-PLN-1012
ENVIRONMENTAL WASTE MANAGEMENT PLAN	CORP-EN-PLN-1013
INTERIM RECOVERY PLAN FOR ACACIA WOODMANIOURUM 2015-2020	CORP-EN-PLN-1015
WATER CONSERVATION AND EFFICIENCY PLAN	CORP-EN-PLN-1018
ENVIRONMENTAL MANAGEMENT PLAN (THIS DOCUMENT)	CORP-EN-PLN-1020
KARARA IRON ORE PROJECT – COMPLIANCE ASSESSMENT PLAN	CORP-EN-PLN-1024
MUNGADA IRON ORE PROJECT – COMPLIANCE ASSESSMENT PLAN	CORP-EN-PLN-1025
DRINKING WATER QUALITY MANAGEMENT PLAN	CORP-EN-PLN-1027
MINJAR WATER MANAGEMENT PLAN	CORP-EN-PLN-1028
HINGE IRON ORE PROJECT MINE CLOSURE PLAN	CORP-EN-PLN-1029

MUNGADA IRON ORE PROJECT POST-CLOSURE PIT LAKE MANAGEMENT PLAN	CORP-EN-PLN-1034
HINGE IRON ORE PROJECT – COMPLIANCE ASSESSMENT PLAN	CORP-EN-PLN-1036
MINE CLOSURE MANUAL	CORP-EN-PLN-1038
RESEARCH PLAN TO SUPPORT OFFSET REQUIREMENTS FOR THE MALLEEFOWL AND WESTERN SPINY-TAILED SKING – EPBC 2006/3017	CORP-EN-PLN-1039
ABORIGINAL HERITAGE MANAGEMENT PLAN	CORP-EN-PLN-1032
KML Environmental Procedures	Document Number
LAND REHABILITATION	CORP-EN-PRO-1002
APPROVAL REQUESTS AND GROUND DISTURBANCE	CORP-EN-PRO-1004
DUST MONITORING	CORP-EN-PRO-1005
COMPLIANCE AUDITING	CORP-EN-PRO-1006
BORROW PITS	CORP-EN-PRO-1008
FLORA, WEEDS AND PLANT PATHOGENS	CORP-EN-PRO-1009
TERRESTRIAL FAUNA MANAGEMENT	CORP-EN-PRO-1010
SURFACE WATER MANAGEMENT	CORP-EN-PRO-1011
SHIELD-BACKED TRAPDOOR SPIDER (IDIOSOMA NIGRUM) SURVEYS DURING APPROVALS PROCESS	CORP-EN-PRO-1013
APPROVALS SCHEDULE DEVELOPMENT	CORP-EN-PRO-1014
SOIL RESOURCE MANAGEMENT	CORP-EN-PRO-1015
PROGRAM OF WORKS APPLICATIONS AND EXTENTIONS	CORP-EN-PRO-1016
LAND ACCESS PROTOCOL	CORP-EN-PRO-1018

WASTE WATER TREATMENT PLANT DISCHARGE SAMPLING AND MONITORING	CORP-EN-PRO-1019
WESTERN SPINY TAILED SKINK MANAGEMENT, MONITORING AND TRANSLOCATION	CORP-EN-PRO-1024
SHIELD-BACKED TRAPDOOR SPIDER MANAGEMENT AND MONITORING	CORP-EN-PRO-1025
EXPLORATION REHABILITATION STANDARD	CORP-EN-PRO-1030
MALLEEFOWL MANAGEMENT AND MONITORING	CORP-EN-PRO-1035
SEED COLLECTION, CLEANING AND STORAGE	CORP-EN-PRO-1037
REHABILITATION PERFORMANCE MONITORING	CORP-EN-PRO-1040
COMMUNITY WATER MONITORING	CORP-EN-PRO-1042
ENVIRONMENTAL AND HERITAGE DATA MANAGEMENT	CORP-EN-PRO-1045
DOCUMENT DEVELOPMENT AND REVIEW	CORP-EN-PRO-1049
FERAL ANIMAL MANAGEMENT AND MONITORING	CORP-EN-PRO-1050
POTENTIALLY ACID FORMING MATERIALS MANAGEMENT	CORP-EN-PRO-1051
REHABILITATION SCHEDULE	CORP-EN-PRO-1052
GUIDANCE FOR CONTRACTOR AND RESEARCHER HSE MANAGEMENT PLANS FOR KARARA SITE WORK UNDER THE ENVIRONMENT AND COMMUNITY DEPARTMENT	CORP-EN-PRO-1053
KML Environmental Lists	Document Number
ENVIRONMENTAL RISK REGISTER	CORP-EN-LST-1002
ENVIRONMENTAL LEGAL AND OTHER OBLIGATIONS REGISTER	CORP-EN-LST-1003
ENVIRONMENTAL INCIDENT CLASSIFICATION MATRIX	CORP-EN-LST-1004

KML Community/Heritage Controlled Documents

KML Community/Heritage Policies	Document Number
LOCAL CONTENT POLICY	CORP-CH-POL-1001
HERITAGE POLICY	CORP-CH-POL-1004
KML Community/Heritage Plans	Document Number
STAKEHOLDER ENGAGEMENT PLAN	CORP-CH-PLN-1002
TRANSHIPPING COMMUNITY ENGAGEMENT PLAN	CORP-CH-PLN-1005
COMMUNITY PLAN – YANDANOOKA BOREFIELD EXPANSION	CORP-CH-PLN-1006

KML – Other Relevant Controlled Documents

KML Plans and Procedures	Document Number
KARARA HEALTH AND SAFETY MANAGEMENT PLAN	CORP-HS-PLN-1001
EMERGENCY RESPONSE PLAN	CORP-HS-PLN-1003
CRISIS MANAGEMENT AND RECOVERY PLAN	CORP-HS-PLN-1004
TRAFFIC MANAGEMENT PLAN	CORP-HS-PLN-1008
INCIDENT MANAGEMENT PROCEDURE	CORP-HS-PRO-1046
JOB HAZARD ANALYSIS PROCEDURE	CORP-HS-PRO-1020
EMERGENCY CONTACT LIST	CORP-HS-FRM-1095
KARARA EXPORT TERMINAL HSE MANAGEMENT PLAN	CORP-PT-PLN-1007

APPENDIX B - APPENDIX B KEY ENVIRONMENTAL MANAGEMENT STRATEGIES

Dust Management	
Aim	<ul style="list-style-type: none"> • To meet all approval and obligation requirements relating to dust management for the Project. • Ensure dust emissions do not adversely affect environmental values or the health, welfare and amenity of people and land uses. • Monitor dust emissions to comply with statutory requirements and acceptable standards.
Key Management Practices	<ul style="list-style-type: none"> • Dust suppression and extraction systems are used throughout high dust potential areas of the processing plant. • Water trucks are used in heavy traffic areas, on unsealed and haul roads which have the potential to generate dust. • Water trucks are fitted with either trickle bar systems or controlled sprays to prevent saline overspray affecting the surrounding ecosystems. • Surface stabilisation methods, such as sealing, sheeting, shielding and chemical treatment, shall be employed in locations where dust emissions are likely to be significant. • Native vegetation is retained as far as practicable, to minimize dust lift-off and be used as a wind break. • Progressive rehabilitation of available areas is undertaken to stabilise dust emissions in accordance with the Environmental Procedure – Land Rehabilitation (CORP-EN-PRO-1002).
Relevant Procedures / Documents	<ul style="list-style-type: none"> • KML Environmental Plan – Dust Management CORP-EN-PLN-1010 • KML Environmental Plan – Flora and Vegetation Health Monitoring CORP-EN-PLN-1012 • KML Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005

<p>Monitoring</p>	<ul style="list-style-type: none"> • Ambient environmental dust monitoring is undertaken by KML at sensitive receptors surrounding operations; these provide continual monitoring of the dust levels for comparison against NEPM values. • Dust deposition sampling is undertaken by KML each month, at designated sites surrounding the Project to assess potential accumulation of dust on vegetation in accordance with the KML Environmental Procedure – Dust Monitoring CORP-EN-PRO-1005. • Vegetation health monitoring is undertaken by KML annually with reference to dust deposition results. • Meteorological data monitoring is undertaken by KML to capture parameters such as wind speed, direction, temperature, rainfall, and date of collection. It is located at the KML Plant site.
<p>Reporting</p>	<ul style="list-style-type: none"> • Monitoring data is recorded in the KML Filesite environmental database. • Annual environmental report including dust deposition levels are submitted annually.
<p>Corrective Actions</p>	<ul style="list-style-type: none"> • All non-compliances, such as dust exceedances of NEPM or internal threshold values, are recorded as Environmental incidents; • Appropriate actions are issued and managed via INX InControl.

Waste Management	
Aim	<p>To meet all approval and obligation requirements relating to waste management for the Project.</p> <p>Non Mineral Waste</p> <ul style="list-style-type: none"> • Non-mineral wastes produced during site activities are managed to ensure impacts to the environment are minimised, reuse and recycling opportunities are maximised and all relevant statutory requirements are adhered to. <p>Hazardous / Controlled Waste</p> <ul style="list-style-type: none"> • To ensure the transport, storage and handling of hazardous and controlled waste is conducted in a safe and compliant manner.
Key Management Practices	<p>Non Mineral Waste</p> <ul style="list-style-type: none"> • Non-putrescible and putrescible waste is disposed of at the KIOP Landfill Facility or removed from site. • Hydrocarbon waste, recyclable waste, general waste and inert waste are segregated. • Recyclable materials, including cardboard, glass, batteries and scrap metal are recycled wherever possible. • Separate clearly labelled waste bins, with fully enclosed lids (except skip bins) are provided at all work areas by the area operator. • Landfill managed to cover wastes in such a way that odour and pests are minimised. • A licensed controlled waste carrier removes all bulk waste oils and oily products generated on site and retains all waste disposal receipts.

<p>Key Management Practices</p>	<p>Hazardous / Controlled Waste</p> <ul style="list-style-type: none"> • All chemicals must be approved by KML Environment and Safety Departments prior to being transported to site. • Safety Data Sheets (SDS) are kept on site for all hazardous materials in their area of use. • All chemicals are stored in containment bunds, sea containers or chemical cabinets as appropriate for the volume and nature of the chemicals. • Hydrocarbon contaminated stormwater is kept separate from other water sources, including general waste. • Spill control equipment is stored in close proximity to all diesel and waste oil storage facilities, including workshops and laydown yards. • Spillages are contained and managed and contaminated soil transported and treated at the site bioremediation facility or disposed offsite as controlled waste.
<p>Relevant Procedures / Documents</p>	<ul style="list-style-type: none"> • KML Environmental Plan – Waste Management – CORP-EN-PLN-1013. • KML Storage and Use of Hazardous Substances Standard CORP-HS-STD-1042. • Australian Standard AS 1940:2017 Storage, and Handling of Flammable and Combustible Liquids.
<p>Monitoring</p>	<ul style="list-style-type: none"> • Waste and recycling material volumes are recorded on the KML waste and recycling movement register. • Regular inspections of the landfill site are conducted as per the KML Environmental Form - Landfill Inspection CORP-EN-FRM-1007. • Regular inspections of laydown areas and chemical and hydrocarbon storage areas ensure storage compliance and no contamination to the environment as per the KML Environmental Form - Contractor and Facilities Inspection CORP-EN-FRM-1030.



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Reporting	<ul style="list-style-type: none">• Report and maintain information on volumes and types of controlled wastes disposed offsite by retaining copies of all waste disposal receipts. Receipts to be provided to the KML Environment Department.• Volumes of waste material and recycled material is reported via the Environmental monthly reporting system.
Corrective Actions	<ul style="list-style-type: none">• Any non-compliance is recorded and managed by the issue of appropriate corrective actions via InControl.

Potential Acid Forming Material Management	
Aim	<ul style="list-style-type: none"> • The identification, management and disposal process for Potentially Acid Forming (PAF) waste rock material. PAF waste rock material is classified as material with a total sulphur assay greater than 0.3%. • To ensure KML meets legal and other commitments in relation to PAF management.
Key Management Practices	<ul style="list-style-type: none"> • The KML Mining Department is responsible for provision of a PAF cell design within the designed WRD to the KML Environment and Community Department prior to construction. • Identification of PAF waste rock material to be deposited within the PAF cell. • WRD landforms are constructed in accordance with the engineering design outlined in the mining proposal. • PAF material is deposited within the PAF cell covered progressively during mining activities with a dry cover of NAF materials to minimise the influx of water and reduce exposure to oxygen. • PAF Cells are encapsulated by non-acid forming waste rock.
Relevant Procedures / Documents	<ul style="list-style-type: none"> • Mine Closure Manual CORP-EN-PLN-1038 • KML Environmental Procedure – Potentially Acid Forming Material Management CORP-EN-PRO-1051 • KML Environmental Procedure – Land Rehabilitation CORP-EN-PRO-1002



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Monitoring	<ul style="list-style-type: none">• Monitor PAF management as per the KML Environmental Procedure – Potentially Acid Forming Material Management CORP-EN-PRO-1051• KML Environmental Form – PAF Cell Construction Signoff CORP-EN-FRM-1073• KML Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040• Inspections of rehabilitated WRD as per the KML Environmental Form - Land Rehabilitation Inspection CORP-EN-FRM-1017
Reporting	<ul style="list-style-type: none">• Details of each PAF cell are included in the Annual Environmental Report submitted to the Department of Mines, Industry Regulation and Safety.
Corrective Actions	<ul style="list-style-type: none">• Any non-compliance is recorded and managed by the issue of appropriate corrective actions via InControl.

Hydrocarbon, Chemical and Spill Management	
Aim	<ul style="list-style-type: none"> To ensure that hazardous substance storage is designed, constructed and managed to avoid, remedy, or mitigate adverse effects on personnel and the environment. To ensure that hydrocarbon and chemical spills will be controlled and if required, cleaned up appropriately in accordance with relevant regulations / procedures.
Key Management Practices	<ul style="list-style-type: none"> All personnel using hazardous materials shall be aware of the SDS guidance on dealing with spills of that material prior to commencing work, and trained in spill response for bulk storage greater than 500L. Spill management equipment appropriate to the volume and type of hydrocarbons or chemicals being stored is available, clearly labelled and highly visible at the chemical / hydrocarbon storage location at all times. Spillages shall be contained and managed by the use of absorbent material and the excavation and removal of contaminated soil to the site bioremediation facility or, where this is not possible, an off-site licensed facility.
Relevant Procedures / Documents	<ul style="list-style-type: none"> KML Environmental Plan – Environmental Waste Management CORP-EN-PLN-1013 Health and Safety Standard - Storage and Use of Hazardous Substances CORP-HS-STD-1042 Australian Standard AS 1940:2017 Storage, and Handling of Flammable and Combustible Liquids
Monitoring	<ul style="list-style-type: none"> Regular inspections of laydown areas and chemical and hydrocarbon storage areas to ensure there is no contamination to the environment as per the KML Environmental Form - Contractor and Facilities Inspection CORP-EN-FRM-1030.



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Reporting	<ul style="list-style-type: none">• All spills are recorded as environmental incidences and entered into InControl.• Report and maintain information on volumes and types of wastes disposed offsite via the Environmental Monthly Reporting system and by retaining copies of all waste disposal receipts. Receipts to be provided to the Site Environment Department.• Significant incidents relating to hydrocarbons and chemicals will be reported in Annual Environmental Reporting.
Corrective Actions	<ul style="list-style-type: none">• Corrective actions are issued for any non-compliance with the requirements of this plan.• Corrective actions are managed via InControl.

Flora and Weeds	
Aim	<ul style="list-style-type: none"> • To ensure KML meets legal and other commitments in relation to Flora and Weed management. • Minimise the potential impacts to flora during the operational phase of the Project. • Prevent the spread of existing weed populations within the Project. • Minimise the risk of introducing weeds not previously recorded at the Project. • Prevent the spread of plant pathogens to the Project.
Key Management Practices	<ul style="list-style-type: none"> • Priority Flora is protected at all times, except in accordance with an approved GD Permit. • A Conservation Significant Flora Identification Guide (CORP-EN-REP-1002) is made available to site personnel. • Areas that will be temporarily cleared (e.g. haul roads, topsoil storage locations, ROM pads etc.) and no longer required for mining operations are progressively rehabilitated using endemic species to standard ecological targets. • Known or suspected weed infestations within the Project are demarcated on a site plan. • A Weed Identification Guide (CORP-EN-REP-1003) is made available to site personnel. • All vehicles and mobile equipment is inspected and cleaned of vegetation, mud and soil prior to entry to site.
Relevant Procedures/ Documents	<ul style="list-style-type: none"> • KML Environmental Plan – Flora and Vegetation Management CORP-EN-PLN-1011 • KML Environmental Plan – Flora and Vegetation Health Monitoring CORP-EN-PLN-1012 • KML Environmental Form - Vehicle and Mobile Equipment Weed Inspection CORP-EN-FRM-1009 • KML Environmental Report - Weed Identification Guide CORP-EN-REP-1003 • KML Environmental Report - Conservation Significant Flora Identification Guide CORP-EN-REP-1004

<p>Monitoring</p>	<ul style="list-style-type: none"> • Monthly monitoring of dust deposition around native vegetation as per the KML Environmental Procedure - Dust Monitoring CORP-EN-PRO-1005. • Vegetation Health as per the KML Environmental Plan – Flora and Vegetation Health Monitoring Plan (CORP-EN-PLN-1012). • Weed monitoring in accordance with Environmental Plan – Flora and Vegetation Management CORP-EN-PLN-1011.
<p>Reporting</p>	<ul style="list-style-type: none"> • Monitoring data and inspection reports is recorded in environmental database and InControl. • Any unauthorised clearing of PEC is reported to the DWER. • Annual Environmental Reporting.
<p>Corrective Actions</p>	<ul style="list-style-type: none"> • Corrective actions are issued for any non-compliance with the requirements of this plan and associated procedures. • Corrective actions are managed via InControl.

Approvals Requests and Ground Disturbance	
Aim	To ensure no unauthorised or unapproved ground disturbance occurs.
Key Management Practices	<ul style="list-style-type: none"> • A GD Permit must be in place prior to the commencement of any ground disturbing work. • A Land Access Permit must be in place prior to entering any private land to conduct ground disturbing work. • AR/GD training and / or awareness is delivered to all personnel conducting ground disturbing works. • Prior to works commencing, the KML Environmental Form - Pre Ground Disturbance Site Inspection Form CORP-EN-FRM-1027 and the KML Environmental Form - Ground Disturbance Release Form CORP-EN-FRM-1014 is completed and signed off. • Personnel are responsible for complying with all requirements outlined in the Land Access Permit, the GD Permit, the Ground Disturbance Release Form and any other instruction issued by KML in relation to their works.
Relevant Procedures/ Documents	<ul style="list-style-type: none"> • KML Environmental Procedure – Approvals Requests and Ground Disturbance CORP-EN-PRO-1004
Monitoring	<ul style="list-style-type: none"> • At the completion of ground disturbing works, the work area is inspected by the KML Environment and Community Department to confirm the works were completed in accordance with any conditions attached to the GD Permit using the KML Environmental Form - Post Ground Disturbance Site Inspection Form CORP-EN-FRM-1015.
Reporting	<ul style="list-style-type: none"> • Record all spatial data for cleared land of native vegetation and report annually through Annual Environmental Reporting and Mine Rehabilitation Fund Reporting. • A record of all approval requests and signed approved ground disturbance permits are kept by both KML and the contractor.



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Terrestrial Fauna Management	
Aim	<ul style="list-style-type: none"> • Maintain the abundance, diversity, geographic distribution and productivity of native fauna, species and ecosystem levels through the avoidance or management of adverse impacts and improvement in knowledge.
Key Management Practices	<ul style="list-style-type: none"> • Site inductions address fauna protection requirements. • Feeding and / or capture of native fauna or feral animals is not permitted on site unless this occurs in accordance with a KML approved fauna study or management exercise. • Where KML is advised of the location of significant fauna and habitats, avoidance sites are recorded and established. • Disturbed areas are rehabilitated as soon as practicable to facilitate fauna habitat restoration. • Foundation holes, excavations, turkey's nests and trenches, wherever practicable, are covered, fenced, barricaded or banded and constructed with a means of egress to prevent injury to fauna. • Observations of feral species, conservation significant species or any fauna mortality are reported to the KML Environment Department. • Traffic management including signage and restricted speed limits are implemented in the vicinity of conservation significant species sightings.

<p>Relevant Procedures/ Documents</p>	<ul style="list-style-type: none"> • KML Environmental Plan - Fauna Management CORP-EN-PLN-1008 • KML Environmental Procedure – Terrestrial Fauna Management CORP-EN-PRO-1010 • KML Environmental Procedure – Western Spiny-tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024 • KML Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 • KML Environmental Procedure - Malleefowl Management and Monitoring CORP-EN-PRO-1035 • KML Health and Safety Plan - Traffic Management CORP-HS-PLN-1008
<p>Monitoring</p>	<ul style="list-style-type: none"> • Annual monitoring is conducted as per KML Environmental Procedure – Western Spiny-tailed Skink Management, Monitoring and Translocation CORP-EN-PRO-1024 • Annual monitoring is conducted as per KML Environmental Procedure - Shield-backed Trapdoor Spider Management and Monitoring CORP-EN-PRO-1025 • Annual monitoring is conducted as per KML Environmental Procedure - Malleefowl Management and Monitoring CORP- EN-PRO-1035 • Fauna sightings, relocations and mortalities are reported and recorded as per the KML Environmental Form - Fauna Sighting, Relocation and Mortality Form CORP-EN-FRM-1045
<p>Reporting</p>	<ul style="list-style-type: none"> • Fauna licence returns are submitted to the DBCA in accordance with the relevant licence. • Malleefowl deaths are reported to the DBCA and the Department of Environment and Energy. • All fauna data relevant to the Project are reported in annual environmental reports.



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Fire	
Aim	<ul style="list-style-type: none"> To ensure mining operations do not increase the risk of fire impact upon people, property or the environment, particularly areas classified as Priority Ecological Communities (PEC).
Key Management Practices	<ul style="list-style-type: none"> All isolated work is conducted in consideration of Department of Fire and Emergency Services Fire Danger Ratings and Alerts. All vehicles and plant are equipped with fire extinguishers complying with Australian Standards <i>AS1841</i>. All hydrocarbon waste is stored in controlled waste bins, and flammable materials stored in bunded cabinets. Fire damaged ecological environments are treated as a 'Rehabilitated Area' to protect against erosion and encourage recovery, and monitored as part of the KML Environmental Plan - Flora and Vegetation Health Monitoring CORP-EN-PLN-1012. Fire Emergency Procedures are communicated to relevant personnel through a competency based training module.

<p>Relevant Procedures/ Documents</p>	<ul style="list-style-type: none"> • KML Environmental Plan – Flora and Vegetation Management CORP-EN-PLN-1011 • KML Environmental Plan – Flora and Vegetation Health Monitoring CORP-EN-PLN-1012 • KML Environmental Plan – Environmental Waste Management CORP-EN-PLN-1013 • Australian Standards AS1841 – Portable Fire Extinguishers – General Requirements • KML Health and Safety Plan- Bush Fire Management – CORP-HS-PLN-1013 • KML Health and Safety Plan - Emergency Response – CORP-HS-PLN-1003 • Australian Standard AS1940-2017 - The Storage and Handling of Flammable and Combustible Liquids • Health and Safety Standard - Storage and Use of Hazardous Substances CORP-HS-STD-1042
<p>Monitoring</p>	<ul style="list-style-type: none"> • Fire damaged areas, as a result of mining related activities, are monitored according to the KML Environmental Plan - Flora and Vegetation Health Monitoring CORP-EN-PLN-1012.
<p>Reporting</p>	<ul style="list-style-type: none"> • All fire damage to the environment is recorded as an Environmental Incident within the corrective and preventative actions system in InControl. Fire damage to native vegetation, as a result of KMLs operations, are reported to the DBCA and DWER Regional Branch. • All incidents are included in KML’s Annual Compliance Assessment Report.
<p>Corrective Actions</p>	<ul style="list-style-type: none"> • Corrective actions are issued for any non-compliance with the requirements of this plan and associated procedures. • Corrective actions are managed via InControl.

Land Rehabilitation	
Aim	<ul style="list-style-type: none"> To ensure, as far as practicable, that rehabilitation achieves a stable and functioning landform which is consistent with the surrounding landscape and other environmental values.
Key Management Practices	<ul style="list-style-type: none"> Areas that have been temporarily cleared to enable operational activities to progress, but are no longer required for mining operations are progressively rehabilitated. Where possible, overburden slopes are progressively battered, spread with stored topsoil and vegetation (where available) and stabilised to prevent erosion and encourage vegetation establishment. Where possible, topsoil is respread to a depth of up to 100 mm to encourage re-vegetation.
Relevant Procedures/ Documents	<ul style="list-style-type: none"> KML Environmental Plan – Mine Closure Manual – CORP-EN-PLN-1038 KML Environmental Procedure – Land Rehabilitation CORP-EN-PRO-1002 KML Environmental Procedure – Soil Resource Management CORP-EN-PRO-1015 KML Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040

<p>Monitoring</p>	<ul style="list-style-type: none"> • Rehabilitation performance is monitored annually in accordance with the KML Environmental Procedure - Rehabilitation Performance Monitoring CORP-EN-PRO-1040 and for a period of seven years following rehabilitation. • Rehabilitated areas are inspected periodically by the KML Environment and Community Department to ensure compliance with the KML Environmental Form - Land Rehabilitation Inspection CORP-EN-FRM-1017. • Stockpiled topsoil and subsoil are inspected using the KML Environmental Form - Topsoil and Subsoil Inspection Form CORP-EN-FRM-1033. • Inspections and sign off of each stage during the progressive rehabilitation process using the KML Environmental Form - Land Rehabilitation Sign off CORP-EN-FRM-1053.
<p>Reporting</p>	<ul style="list-style-type: none"> • All incidents for any non-compliance with the requirements of this plan and associated procedures are recorded in InControl. • Record all spatial data for rehabilitated land and report annually through Annual Environmental Reporting and Mine Rehabilitation Fund Reporting. • Submit an annual report of the rehabilitation vegetation performance against the Rehabilitation Schedule to the CEO of the DBCA and DMIRS.
<p>Corrective Actions</p>	<ul style="list-style-type: none"> • Corrective actions are issued for any non-compliance with the requirements of this plan and associated procedures. • Corrective actions are managed via InControl.

Water	
Aim	<ul style="list-style-type: none"> To maintain the quality and quantity of water so that existing environmental values are protected and relevant licenses and legislation are met.
Key Management Practices	<ul style="list-style-type: none"> Culverts are placed under roads, embankments and formations to permit free flow of drainage water and to assist in water shedding. Chemicals, fuel and other hydrocarbons are stored in accordance with the Health and Safety Standard - Storage and Use of Hazardous Substances CORP-HS-STD-1042. All wash-down facilities comply with the requirements of the Water Quality Protection Note (WQPN) 68 Mechanical Equipment Wash-down (Department of Water, 2006). Any water that is potentially contaminated with hydrocarbons is passed through a suitable device to remove hydrocarbons. Treated water is transferred to an evaporation pond or used for dust suppression purposes or removed via a controlled waste carrier. Cleared vegetation and topsoil is stockpiled away from watercourses and in discrete stockpiles to minimise interference to surface flows.
Relevant Procedures/ Documents	<ul style="list-style-type: none"> KML Environmental Procedure – Surface Water Management CORP-EN-PRO-1011 KML Environmental Procedure – Waste Water Treatment Plant Discharge Sampling and Monitoring CORP-EN-PRO-1019 KML Environmental Plan - Water Conservation and Efficiency CORP-EN-PLN-1018 Health and Safety Standard - Storage and Use of Hazardous Substances CORP-HS-STD-1042. Water Quality Protection Note (WQPN) 68 Mechanical Equipment Wash down

<p>Monitoring</p>	<ul style="list-style-type: none"> • Monitoring of water licenses is undertaken as per the Ground Water Licence Operating Strategy. • Monitoring of wastewater treatment plants is undertaken in accordance with the Wastewater Treatment Plant Monitoring Schedule. • Turkey Nests are inspected as per the KML Environmental Form - Turkey Nest Inspection Form CORP-EN-FRM-1048.
<p>Reporting</p>	<ul style="list-style-type: none"> • Incidents for any non-compliance with the requirements of this plan and associated procedures are recorded in InControl. • A report, including monitoring data, is provided to the DWER annually.
<p>Corrective Actions</p>	<ul style="list-style-type: none"> • Corrective actions are issued for any non-compliance with the requirements of this plan and associated procedures. • Corrective actions are managed via InControl.

Soil Resource Management	
Aim	<ul style="list-style-type: none"> To conserve and reuse topsoil and subsoil for land rehabilitation purposes.
Key Management Practices	<ul style="list-style-type: none"> Topsoil is stripped to a minimum depth of 100 mm (where available) and up to 200mm. Subsoil (below the topsoil layer) may be stripped and only removed to the extent required by the infrastructure design and stockpiled separately from topsoil. Topsoil is stored to a maximum height of 2 metres and subsoils stored separately to a maximum height of 3 metres. Where practicable soil stripping is undertaken progressively and is restricted to the minimum area needed at the time to facilitate safe access and operations. Exposure and use of saline soils is minimised and saline soils are stockpiled separately. Soil stripping is not conducted in high wind conditions (to avoid unnecessary loss of soil and potential dust impacts) or during the wet (to minimise compaction) where practicable. Topsoil stripped from areas of known weed infestation are stockpiled separately, clearly demarcated and are not used for rehabilitation works.
Relevant Procedures/ Documents	<ul style="list-style-type: none"> KML Environmental Procedure – Soil Resource Management CORP-EN-PRO-1015 KML Environmental Procedure – Land Rehabilitation - CORP-EN-PRO-1002 KML Environmental Procedure - Flora, Weeds, and Plant Pathogen Management CORP-EN-PRO-1009

<p>Monitoring</p>	<ul style="list-style-type: none"> • Topsoil stockpiles are inspected regularly for erosion and weed control as per the KML Environmental Form - Topsoil and Subsoil Inspection CORP-EN-FRM-1033. • A register of topsoil stockpiles is maintained within KMLs GIS database and shall record the stockpile number, the date placed, the type (top soil or sub soil), the source location (GD Permit number) and stockpile location (GPS points).
<p>Reporting</p>	<ul style="list-style-type: none"> • The findings of internal and external audits and inspections are reported in Annual Environmental Reporting. • Volumes of top soil and sub soil being stockpiled are reported by the KML Surveyor or the Contractor HS representatives via the Monthly Reporting system.
<p>Corrective Actions</p>	<ul style="list-style-type: none"> • Corrective actions are issued for any non-compliance with the requirements of this plan and associated procedures. • Corrective actions are managed via InControl.

Karara Export Terminal Operations Management	
Aim	<ul style="list-style-type: none"> To ensure the KET operates within the requirements of the Mid West Port Authority's (MWPA) Licence to Operate (L4275/1982/15) and Stevedoring Licence.
Key Management Practices	<ul style="list-style-type: none"> Dust is managed through an enclosed conveyor system and dust extraction at transfer points from the ore storage shed to the ship loader at Berth 7. Processes are in place to control the loss of shipping product to open water at the port. Chemicals, fuel and other hydrocarbons are stored in accordance with the Health and Safety Standard - Storage and Use of Hazardous Substances CORP-HS-STD-1042. All waste is disposed of in waste bins and disposed of at the Geraldton landfill facility by a licensed contractor. All wash-down facilities comply with the requirements of the Water Quality Protection Note (WQPN) 68 Mechanical Equipment Wash-down (Department of Water, 2006). Any water that is potentially contaminated with hydrocarbons is passed through a suitable device to remove hydrocarbons before being reused. Treated water may be used for dust suppression purposes or removed via a controlled waste carrier.
Relevant Procedures/ Documents	<ul style="list-style-type: none"> KML Environmental Plan – Environmental Waste Management CORP-EN-PLN-1013 KML Environmental Procedure – Surface Water Management CORP-EN-PRO-1011 Health and Safety standard - Storage and Use of Hazardous Substances CORP-HS-STD-1042 Australian Standard AS 1940:2017 Storage, and Handling of Flammable and Combustible Liquids. Water Quality Protection Note (WQPN) 68 Mechanical Equipment Wash-down



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Monitoring	<ul style="list-style-type: none">• Regular inspections and wash-down bay sampling of the KET are undertaken in accordance with the KML Environmental Form – Site Inspection form - Port CORP-EN-FRM-1044.• MWPA monitoring for airborne dust emissions is conducted in accordance with L4275/1982/15.
Reporting	<ul style="list-style-type: none">• The findings of internal and external audits and inspections are recorded in InControl.• Spills of hydrocarbons and or product to the water within the MWPA operational area are reported to the MWPA.
Corrective Actions	<ul style="list-style-type: none">• Corrective actions are issued for any non-compliance with the requirements of this plan.• Corrective actions are managed via InControl.