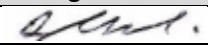






CONSULTATION AND COMMUNICATION PROCEDURE

| Document Quality Review Process | | | | |
|---------------------------------|--|------------------------|--|------------------------------|
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TABLE OF CONTENTS

| | | |
|-------------|--|-----------|
| 1 | PURPOSE | 4 |
| 2 | SCOPE..... | 4 |
| 3 | LEGISLATIVE REQUIREMENTS | 4 |
| 3.1 | ACTS AND REGULATIONS..... | 4 |
| 3.2 | ENVIRONMENTAL ACTS AND REGULATIONS | 4 |
| 3.3 | INTERNATIONAL ORGANISATION STANDARDISATION (ISO)..... | 5 |
| 4 | DEFINITIONS | 5 |
| 4.1 | CONTRACT DEFINITIONS..... | 5 |
| 4.2 | ACRONYMS..... | 7 |
| 4.3 | PERSONAL ACRONYMS | 8 |
| 5 | ENVIRONMENTAL MANAGEMENT SYSTEM | 8 |
| 5.1 | OVERALL SCOPE | 8 |
| 6 | EMS POLICY | 8 |
| 6.1 | ENVIRONMENTAL POLICY | 8 |
| 6.2 | ENVIRONMENTAL POLICY STATEMENT | 9 |
| 7 | ROLES AND RESPONSIBILITIES | 9 |
| 7.1 | PROJECT RESPONSIBILITIES | 9 |
| 8 | GOVERNANCE | 13 |
| 8.1 | GOOD GOVERNANCE..... | 13 |
| 9 | CONTINUOUS IMPROVEMENT | 14 |
| 9.1 | OPPORTUNITIES FOR IMPROVEMENT | 14 |
| 9.2 | MANAGEMENT COMMITMENT AND PARTICIPATION | 14 |
| 9.3 | ENVIRONMENTAL ACCOUNTABILITY | 14 |
| 9.4 | SEEKING CONTINUOUS IMPROVEMENT | 15 |
| 10 | CONSULTATION AND COMMUNICATION PROCEDURE..... | 15 |
| 10.1 | CONSULTATION PROCESS | 15 |
| 10.2 | CONSULTATION ENCOURAGEMENT | 15 |
| 11 | HEALTH AND SAFETY REPRESENTITIVES | 16 |
| 11.1 | HSR ELECTION..... | 16 |
| 11.2 | HSR FUNCTIONS | 16 |
| 11.3 | HSEQ AUDIT AND INSPECTION | 16 |
| 12 | RISK MANAGEMENT DOCUMENT DEVELOPEMENT | 17 |
| 12.1 | HSEQ DOCUMENTS..... | 17 |
| 12.2 | DECISION APPROVAL..... | 17 |
| 12.3 | DECISION DISAGREEMENT | 17 |
| 12.4 | MANAGEMENT SYSTEMS..... | 17 |

| | | |
|-------------|--|-----------|
| 13 | PRE-START / TOOLBOX MEETINGS | 18 |
| 13.1 | SCHEDULED PRE-START / TOOLBOX MEETINGS | 18 |
| 13.2 | PRE-START / TOOLBOX MEETING ENCOURAGEMENT | 19 |
| 13.3 | SAME INFORMATION PROJECT WIDE..... | 19 |
| 14 | COMMUNICATION | 19 |
| 14.1 | INTERNAL COMMUNICATION..... | 19 |
| 14.2 | CHAIN OR COMMUNICATION..... | 20 |
| 14.3 | COMMUNICATING LEGAL OBLIGATIONS | 20 |
| 14.4 | HSEQ REPORTS | 20 |
| 14.5 | REPORTING INCIDENTS | 20 |
| 14.6 | EXTERNAL COMMUNICATION | 20 |
| 14.7 | ENVIRONMENTAL ASPECTS AND IMPACTS..... | 20 |
| 14.8 | MEDIA COMMUNICATION | 20 |
| 14.9 | MONITORING AND MEASUREMENT | 20 |
| 15 | TRAINING REQUIREMENTS | 21 |
| 15.1 | TRAINING MAINTENANCE..... | 21 |
| 16 | PROCEDURE REVIEW | 21 |
| 16.1 | 3 YEARLY REVIEW..... | 21 |
| 17 | REFERENCE DOCUMENTS | 21 |
| 17.1 | STANDARDS | 21 |
| 17.2 | EMS MANAGEMENT PLANS | 21 |
| 17.3 | EMS POLICIES | 21 |
| 17.4 | EMS PROCEDURES | 21 |
| 17.5 | EMS REGISTERS..... | 22 |
| 17.6 | EMS FORMS..... | 22 |

1 PURPOSE

This Heritage Minerals Consultation and Communication procedure seeks to ensure all persons at any Heritage Minerals operation is able to contribute to be involved in Consultation and Communication in the making of decisions affecting their Health Safety Environmental and Quality whilst at work.

2 SCOPE

This procedure applies to all Mount Morgan Gold Mine, functions and project within the responsibility of Heritage Minerals, including Mine Maintenance, Construction and Mining Operation. All Risks associated with this Procedure will be assessed and controlled in accordance with the Hierarchy of Control ISO 31000

3 LEGISLATIVE REQUIREMENTS

3.1 Acts and Regulations

- Qld Work Health Safety Act 2011.
- Qld Work Health Safety Regulations 2011.
- Qld Mining and Quarrying Safety and Health Act 1999.
- Qld Mining and Quarrying Safety and Health Regulation 2017
- Qld Workers Compensation and Rehabilitation Act 2003.
- Qld Workers Compensation and Rehabilitation Regulation 2014.
- Qld Electrical Safety Act 2002.
- Qld Electrical Safety Regulation 2013.
- Qld Heritage Act 1992.
- Qld Building Act 1975; and
- Fair Work (Commonwealth Powers) and Other Provisions Act 2009.

3.2 Environmental Acts and Regulations

Heritage Minerals has a suite of Environmental and Federal legislative obligations which shall be met through the adoption of best practices outlined in this Environmental Management Plan. Below provides a summary of applicable key legislation including:

- Qld Environmental Protection Act 1994.
- Qld Environmental Protection Regulation 2019.
- Qld Aboriginal Heritage and Cultural Act 2003.
- Qld Coastal Protection and Management Act 1995.
- Qld Coastal Protection and Management Regulation 2017.
- Commonwealth Environmental Protection and Biodiversity Conservation Act 1999.
- Qld Fisheries Act 1994.
- Qld Planning Act 2016.
- Qld Biosecurity Act 2014.
- Commonwealth Native Title Act 1993.
- Qld Native Title Act 1993.
- Qld Nature Conservation Act 1992.
- Qld Nature Conservation Regulation (Animals) 2020.
- Qld Nature Conservation Regulation (Plants) 2020.

- Qld Heritage Act 1992.
- Qld Heritage Regulation 2015.
- Qld Vegetation Management Act 1999.
- Qld Vegetation Management Regulation 2012.
- Qld Water Act 2000.
- Qld Water Regulation 2016.
- Qld Environmental Protection Regulation 2019.
- Qld Environmental Protection (Noise Policy) 2019.
- Qld Environmental Protection (Water and Wetland Biodiversity Policy) 2019; and
- Qld Environmental Protection (Air policy) 2019.

3.3 International Organisation Standardisation (ISO)

- ISO 45001:2018 Occupation any of the Management Systems,
- ISO 14001:2015 Environmental Management Systems.
- ISO 9001:2015 Quality Management Systems; and
- ISO 31000, 2019 Risk Management.

4 DEFINITIONS

4.1 Contract Definitions

| Term: | Definition: |
|----------------------------------|--|
| Environmental Aspect | An environmental aspect is defined in ISO 14001 as an element of an organisation's activities, products or services that can interact with the environment. |
| Principal | Landowner or current holder of the mining lease. |
| Project | The Mount Morgan mine exploration and care and maintenance activities. |
| Heritage Minerals Pty Ltd | Contractor for this project. |
| Contractor | Contractor means the Company, Business or Organisation bound to execute the work under the contract. The term Contractor is used within this document to indicate the party responsible to perform the scope of works. No other legal or contractual meaning is implied and on this project Heritage Minerals is the Contractor. |
| Sub-Contractor | Any person engaged by the Contractor to perform any work under contract, including a supplier, consultant or any approved Sub-Contractor, but not including a Worker of the Sub-Contractor. |
| Contract | Contract means the agreement between Heritage Minerals and the lease holder to perform the works outlined in the Scope of Work. |
| Worker | A Worker is a person who performs work in any capacity for a business or undertaking including any Workers employed, labour hire Workers, volunteers, work experience students, Contractors, Workers of Contractors, |

| | |
|-------------------------------|---|
| | <p>apprentices, trainees and outworkers. Note: a ‘person’ in this context can include a whole business or government agency.</p> |
| Competent Person | <p>- A competent person is any person who has acquired through training a qualification or hold the experience the knowledge and skills to carry out the tasks in accordance with the Scope of Work and has been verified competent with a certified qualification.</p> |
| Visitor | <p>A Visitor is a person who attends the project who shall not conduct any work practises and be escorted by a fully inducted person at all times.</p> |
| Project | <p>A project is where work is carried out for a business or undertaking and includes a place where a Worker goes, or is likely to be, while at work.</p> |
| Reasonably Practicable | <p>According to the Qld WHS Act 2011 and the Qld WHS Regulation 2011, reasonably practicable means that which, or was at a particular time, reasonably able to be done in relation to ensuring Health Safety Environmental and Quality, taking into account and weighing up all relevant matters including:</p> <ul style="list-style-type: none"> • The likelihood of the Hazard or Risk concerned occurring. • The degree of harm that might result from the Hazard or Risk. • What the person concerned know, or ought reasonably to know about. • The Hazard or Risk; and • Ways of eliminating the Risk. <p>The availability and suitability of ways to eliminate or minimise the Risk. After assessing the extent of the Risk and the available ways of eliminating or minimising the Risk – the costs associated with available ways of eliminating or minimising the Risk, including whether the cost is grossly disproportionate to the Risk.</p> |
| Stakeholder | <p>A stakeholder is intended to encompass all parties who have a legitimate interest on the project. They may include:</p> <ul style="list-style-type: none"> • Government Authority. • Contractors. • Workers. • Interest groups. • Community organisations. • General public or Visitors the project. • Consultants. • Landowners. • Client; and • Persons or businesses affected by the development. |
| Aspect | <p>Aspect means those elements of Heritage Minerals activities, products or services that can interact with the environment can or does interact with the</p> |

| | |
|--------------------------------|--|
| | environment and may have a significant impact. These interactions and their effects may be continuous in nature, periodic, or associated only with events, such as emergencies. |
| Impact | Impact is a change to the environment, whether adverse or beneficial, wholly or partially resulting from the organisations aspects |
| Environmental Objective | An environmental objective refers to the overall environmental aim, arising from the elements of the environmental policy, that an organisation sets itself to achieve. |
| Environmental Target | Environmental target refers to the detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives. |
| Must | Means when the requirement is documented it is mandatory; and deviation shall constitute non-compliance by law. |
| Shall | Means when the requirement is documented it is mandatory; and deviation shall constitute non-compliance by law. |
| Should | Indicates the requirement is recommended or expected. |
| May | Indicates that the requirement is optional or at the person’s discretion. |

4.2 Acronyms

| Acronym: | Definition: |
|-----------------|---|
| HM | Heritage Minerals |
| EA | Environmental Authority |
| HSEQ | Health, Safety, Environmental and Quality |
| WHS | Work, Health Safety Environmental and Quality |
| PCBU | Person Conducting a Business or Undertaking. |
| EPA | Environment Protection Act |
| DERM | Department of Environment Resources |
| EMS | Environmental Management System |
| EMP | Environmental Management Plan |
| EIS | Environmental Impact Statement |
| PRA | Project Risk Assessment |
| HAZID | Hazard Identification |
| SDS | Safety Data Sheet |
| SWMS | Safe Method Work Statement. |
| JSEA | Job Safety and Environmental Analysis |
| VOC | Verification of Competency. |

| | |
|-------------|---------------------------------|
| ICAM | Incident Causal Analysis Method |
| NCR | Non-Compliance Report |

4.3 Personal Acronyms

| Acronym: | Definition: |
|-----------------|---|
| CEO | Chief Executive Officer |
| SSE | Site Senior Executive |
| HSEQM | Health, Safety, Environmental and Quality Manager |
| SUP | Supervisor |
| WRK | Worker |
| VIS | Visitor |

5 ENVIRONMENTAL MANAGEMENT SYSTEM

5.1 Overall Scope

The Environmental Management System (EMS) is to be used for the management and control of the Operation. The Environmental Management System is a hierarchical system of documentation with the primary objective to manage Risk, Environmental aspects of the Operation. It represents a framework and documentation that will be utilised by Heritage Minerals and Contractors in the delivery of the Operation.

This Environmental Management Plan contains the main elements of the environmental management for the Project. The interaction and reference to related documents described in this Environmental Management Plan includes but is not limited to:

- Environmental Policy.
- Environmental Management Plan.
- Environmental Procedures.
- Guidelines.
- Training Material; and
- Registers, Forms and Records.

6 EMS POLICY

6.1 Environmental Policy

The Heritage Minerals Environmental Policy is the principal document of this Environmental Management Plan. All health, safety and in particular environmental objectives, targets and practices are to be consistent with the commitments set out in the policy. The policy is to be communicated to all project Workers, including sub-contractors and where requested, be displayed and introduced during Worker inductions.

Heritage Minerals Environmental Policy describes and confirms the Heritage Minerals commitment to sound environmental management on the Project. Heritage Minerals is committed to sustainable development and recognises that the long-term sustainability of the Heritage Minerals is depended upon good stewardship in

both the protection of the environment, and the efficient management of the exploration and extraction of mineral resources.

6.2 Environmental Policy Statement

|  Environmental Policy | |  | | | | | |
|--|---|--|------------|-----------------|----|--------------|--------|
|  | | | | | | | |
| <p>Heritage Minerals Pty Ltd (the "Corporation") is committed to sustainable development and we recognise that the long-term sustainability of our business is dependent upon good stewardship in both the protection of the environment and the efficient management of the exploration and extraction of mineral resources. Our values and business principles as a Corporation are based on a "zero harm" environmental management performance; they underpin our environmental policy and represent the minimum guidelines for the Corporation in this respect. We will ensure that directors, officers, employees and contractors are aware of this policy as well as the relevant responsibilities which it sets out.</p> <ul style="list-style-type: none"> • We will comply with all applicable environmental laws, regulations and requirements. • We are committed to complying with relevant industry standards relating to the management of environmental risks, including the International Finance Corporation's ("IFC") Performance Standards; the IFC and World Bank Environmental, Health and Safety Guidelines; and the International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide in the Production of Gold. • We are committed to establishing and maintaining management systems to identify, monitor and control the environmental aspects of our activities. Where appropriate, we may require employees to undertake training to ensure they are complying with best industry practices and all applicable environmental laws, regulations and requirements. • We will ensure that resources are available to meet our reclamation and environmental obligations. • We will ensure that our employees and contractors carry out their responsibilities in accordance with this Policy, applicable law and the industry standards we are committed to meeting. • We will work with local representatives in the communities in which we operate to educate the community on the environmental obligations associated with our activities. • We will conduct audits to monitor, measure and evaluate the effectiveness of our environmental management systems, and will communicate findings to the Safety, Health & Environment Committee of the Board of Directors, and, where appropriate, to external stakeholders. We will strive to increase transparency in our annual public disclosure on environmental matters, particularly those relating to risk management systems in place and mitigation of environmental risk. • We are committed to transparent communication and consulting with interested and affected parties on environmental aspects of our activities. • We will work to continually improve our environmental performance over time, including with regard to increasing our energy efficiency and reducing emissions and waste, and to promote sustainable development in the areas in which we operate. • We recognise the increasing awareness within our industry of climate change and the need to participate in solutions that address the long-term impact of climate change, including where feasible, the reduction of greenhouse gas emissions. In particular we recognise the sensitivity around water management and water scarcity, where we will aim to constantly improve water management systems and their efficiency, and to monitor our usage of water resources in our areas of operation. <p>The Board of Directors of the Corporation will review and evaluate this Policy on an annual basis to determine its efficacy. This Policy will be posted on the Corporation's website. Additionally, a copy of the policy will be posted at mine sites operated by the Corporation.</p> | | | | | | | |
| Heritage Minerals Representative: | Malcolm Peterson |  | | | | | |
| Position: | Chief Executive Officer (CEO) | | | | | | |
| Signature: |  | | | | | | |
| Date: | 07/12/2020 | | | | | | |
| Doc No.: | HM-MMM-ENV-POL-001-ROA-Environmental | Rev Date: | 01/11/2020 | Rev No.: | 0A | Page: | 1 of 1 |

7 ROLES AND RESPONSIBILITIES

7.1 Project Responsibilities

| Position: | Definition: |
|-----------|-------------|
|-----------|-------------|

| | | | | | | | |
|-------------|---|------------------|------------|-----------------|----|--------------|---------|
| Doc: | HM-MMM-ENV-PRO-014-ROA-Consultation & Communication | Rev Date: | 01/11/2020 | Rev No.: | 0A | Page: | 9 of 23 |
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| | |
|-----------------|---|
| PCBU | <p>A person conducts a business or undertaking when:</p> <ul style="list-style-type: none"> • Whether the person conducts Heritage Minerals or undertaking alone or with others; and • Whether or not Heritage Minerals or undertaking is conducted for profit or gain. <p>And must:</p> <ul style="list-style-type: none"> • Providing the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of Heritage Minerals or undertaking. <p>A business or undertaking conducted by a person includes a business or undertaking conducted by a partnership or an unincorporated association. If a business or undertaking is conducted by a partnership, other than an incorporated partnership, a reference in the WHS Act to a person conducting Heritage Minerals or undertaking is to be read as a reference to each partner in the partnership.</p> <p>A person does not conduct a business or undertaking to the extent that the person is engaged solely as a Workers in, or as an Officer of, that business or undertaking. An elected member of a local government does not in that capacity conduct a business or undertaking.</p> <p>A regulation may specify the circumstances in which a person may be taken not to be a person who conducts a business or undertaking for the purposes of the WHS Act or any provision of the WHS Act. A volunteer association does not conduct a business or undertaking for the purposes of the WHS Act. Volunteer association means a group of volunteers working together for 1 or more community purposes where none of the volunteers, whether alone or jointly with any other volunteers, employs any person to carry out work for the volunteer association.</p> |
| Officers | <p>Under section 27 of the WHS Act, a PCBU has a duty or obligation under WHS legislation, an Officer of the PCBU must exercise 'due diligence' to ensure that the PCBU complies with the duty or obligation.</p> <p>The Officer's obligation of due diligence relates to any duty or obligation that the PCBU may have under the WHS Act or WHS Regulations and is therefore potentially extensive in scope. However, a definition of 'due diligence' is provided, which may help an Officer in finding practical ways to comply with the duty. In particular, section 27 (5) defines 'due diligence' as including taking reasonable steps including:</p> <ul style="list-style-type: none"> • To acquire and keep up-to-date knowledge of work health and safety matters. • To gain an understanding of the nature of the operations of the PCBU's business or undertaking and generally of the hazards and risks associated with those operations. • To ensure that the PCBU has available for use; and uses, appropriate resources and processes to eliminate or minimise risks to health and safety from work Company Vehicle out as part of the conduct of Heritage Minerals or undertaking. • To ensure that the PCBU has appropriate processes for receiving and considering information regarding incidents, hazards and risks and responding in a timely way of that information. • To ensure that the PCBU has; and implements, processes for complying with any duty or obligation of the PCBU under WHS legislation; and |

- To verify the provision and use of the resources and processes referred to in the five preceding dot points.

Further assistance for Officers appears in examples at the end of section 27. The processes for complying with duties and obligations that the PCBU shall have in place and implement under section 27 (5) (e) may include processes for:

- Reporting notifiable incidents.
- Consulting with Workers.
- Ensuring compliance with notices issued under WHS legislation.
- Ensuring the provision of training and instruction to Workers about work health and safety; and
- Ensuring that health and safety representatives receive their entitlements to training.

The section 27 (5) definition of 'due diligence' is inclusive, rather than exclusive. As such, taking the specified steps does not guarantee compliance with the duty of due diligence. However, taking those steps is likely to ensure compliance in most cases.

Managers

Managers are responsible for:

- Champion the implementation and measurement of this Management Plan and exhibit strong leadership and absolute commitment to HSEQ throughout the project.
- Lead by example, modelling the behaviour expected from all Workers on the project.
- Ensure all works are conducted in a way that ensures the health and safety of all project Workers, the community and in general, the Environment.
- Provide adequate resources and budget for the implementation of this Management Plan.
- Establish clear responsibility and accountability for implementation of this Management Plan.
- Implement change culture in accordance with project requirements for continuous improvement.
- Thoroughly overview all investigations of all incidents, ensuring that corrective actions have been implemented to prevent a reoccurrence.
- Comply with all legislation requirements and Heritage Mineral's policies and procedures. Taking accountability of the effectiveness of the environmental management system.
- Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organisation.
- Ensuring the integration of the environmental management system requirements into Heritage Minerals processes.
- Ensuring that the resources needed for the environmental management system are available.
- Communicating the importance of effective environmental management and of conforming to the environmental management system requirements.

| | |
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| | <ul style="list-style-type: none"> • Ensuring that the environmental management system achieves its intended outcome(s). • Directing and supporting persons to contribute to the effectiveness of the environmental management system. • Promoting continual improvement; and • Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility. |
| Supervisors | <p>Supervisors are responsible for:</p> <ul style="list-style-type: none"> • Ensure all Workers under their guidance, know, understand and comply with this Management Plan, associated project plans and procedures so they understand accept and fully carry out their responsibilities for HSEQ. • Lead by example and work towards achieving all HSEQ objectives. • Be familiar with; and enforce, work health and safety regulations applicable to Heritage Mineral's projects within their area of responsibility to ensure, as far as reasonably practicable, the safety and wellbeing of the Workers are maintained. • Establish, maintain, comply and review with SWMS's, JSEA's, Inspections, Take 5's and all lawful instructions by Heritage Mineral Management. • Implement culture change in accordance with Heritage Mineral requirements for continuous improvement. • Ensure all injuries and incidents are reported. Thoroughly investigate all incidents that happen in relation to their crews, ensuring that corrective actions are implemented to prevent a reoccurrence. • Ensure compliance with Heritage Mineral workers compensation and injury management policies and procedures. • Ensure that all Workers under their supervision correctly use and are trained to maintain the personal protective equipment provided. • Plan the work and organise the work zone so that work is executed without risk of personal injury or adverse effects on equipment and the environment. • Facilitate Pre-Start / Toolbox meetings; and ensure corrective actions are followed up; and closed out. • Carry out daily informal site inspections and initiate action to ensure the safety and wellbeing of Workers. • Participate in documented project inspections. • Conduct minimum of one HSEQ Audit monthly and record; and • Ensure communication and consultation takes place on health and safety related matters. |
| Workers | <p>Workers are classified as any person who carry out work, in any capacity, for a PCBU. Workers must:</p> <ul style="list-style-type: none"> • Participate in hazard identification and or elimination activities such as SWMS's preparation. |

- Regard safety as a central theme in their actions and take reasonable care to ensure their own health and safety and the health and safety of others.
- Ensure that the correct tools and equipment are used for the job.
- Use the HSEQ equipment and protective clothing supplied as appropriate and trained.
- Maintain tools and equipment in good condition.
- Report any defects in plant or equipment to the Supervisor.
- Avoid any improvising task that involves risk.
- Warn other Workers of known hazards and report IMMEDIATELY to their Supervisor.
- Actively participate in Heritage Mineral's HSEQ Programs.
- Report to their Supervisor all incidents IMMEDIATELY.
- Participate in the necessary Incident investigation if required to do so.
- Follow all lawful instructions by their Supervisor; and
- At all times comply with the relevant guidelines formulated and disseminated through induction, pre-start / toolbox meetings; and daily site instructions.

8 GOVERNANCE

8.1 Good Governance

Broadly, good governance is about the processes for making and implementing decisions and trying to achieve the best possible process for making those decisions. The Environmental Management System (EMS) provides the framework for good Health, Safety, Environmental and Quality governance, it provides instruction and guidance on how to manage and execute a project in terms of Health, Safety, Environmental and Quality Management.

The Environmental Management System provides the HSEQ Team with the tools to successfully manage the Environmental Aspects of Heritage Minerals and their Stakeholders. This framework shall also enable Heritage Minerals to plan and execute the project with the required Quality, efficiency and cost effectiveness. Most importantly, it allows Heritage Minerals to manage the Environmental Aspects of its people and the Environment in which the project is set.

Heritage Minerals project governance incorporates not only all the Management System including Management Plans, Policies, Procedures and forms outlined in the Health, Safety, Environmental and Quality Management processes at the activity or task-based levels in the Environmental Management System, including:

- Incident reporting.
- Change Management.
- Inductions.
- Complaints reporting.
- HSEQ Inspections.
- HSEQ Audits.
- Permits.
- Continuous improvement: and
- These processes provide the Management and control capabilities at the activity and task level.

9 CONTINUOUS IMPROVEMENT

9.1 Opportunities for Improvement

Heritage Minerals has Procedures which explain the method of planning and implementing the monitoring, measurement, analysis and improvement processes necessary for:

- Demonstrating compliance with the Health, Safety, Environmental and Quality requirements including the Consultation and Communication Procedure and processes.
- Ensuring Health, Safety, Environmental and Quality compliance by carrying out internal HSEQ Audits and Inspections according to the project Audit and Inspection Schedule.
- Improving the efficiency and effectiveness of the Environmental Management System within the Environmental Management System by the application and monitoring of the methods explained in the change Management process and the implementation of continuous improvement processes.
- Ongoing checks and reviews are conducted in order to ensure the capacity of the processes to reach the results planned, as well as the applicable legal and regulatory requisites, have been fulfilled.
- The degree in which the objectives have been reached depending on each of the process indicators is checked and if necessary when the planned results are not achieved, to establish corrective and or preventive actions, which ensure project compliance. Ongoing reporting of compliance is provided in the monthly project Reports; and
- Final reporting of all Health, Safety, Environmental and Quality Assurance, Risk Management, cost and scheduling shall be included in the Monthly project report that provides aggregated data on all criteria for review by the Senior Management Team in the Monthly Management Review Meetings.

9.2 Management Commitment and Participation

Heritage Minerals is committed to the Environmental wellbeing of all project aspects on the project and shall demonstrate leadership in achieving the highest attainable standards on the project's Environmental protection.

The Heritage Minerals project Management team engages through consultation and communication with Stakeholders and their Workers participating on the project to commit to Environmental principles and core values.

All Heritage Minerals team members shall participate in daily Pre-Start / Toolbox meetings, Inspections and Audit forums in line with the expectations of Key Stakeholders, this process shall be informed of their duties and participation shall be monitored throughout the project's lifecycle.

9.3 Environmental Accountability

Implementation of this Construction Environmental Management Plan requires clearly defined delegation of responsibilities, accountabilities and authorities. All Heritage Minerals Stakeholders involved in the management and daily onsite construction activities of the project shall have a general Environmental duty of care as defined in the Environmental Protection Act 1994, "no person must undertake an activity that causes or is likely to cause Environmental harm unless they take all reasonable and practicable measures to prevent or minimise such harm".

9.4 Seeking Continuous Improvement

Continuous improvement isn't about setting a high pace. It's about finding a rhythm that works for Heritage Minerals, it's about changing everyone's mindset to a systematic way of finding better ways to do things. Finding out how to work better as a team.

Showing our Workers that are important and that their thoughts, ideas and questions all matter. Everything shall be more fun if you get your team to take a greater interest in Heritage Minerals results and achievements, instead of just the individual members' goals. Employ the KISS principle, "Keep It Super Simple".

10 CONSULTATION AND COMMUNICATION PROCEDURE

10.1 Consultation Process

Joint consultation is defined as a process in which Heritage Minerals management discusses Health Safety Environmental and Quality matters with Workers of which they have supervisory authority over in order that Workers may make recommendations to the Heritage Minerals management regarding those matters. The aim is the reaching of agreement about those matters.

A well-run consultative operation can offer the following benefits to Heritage Minerals:

- Workers become more aware of Health Safety Environmental and Quality at work.
- All participants can take a proactive rather than reactive role towards Health Safety Environmental and Quality.
- Management can benefit from obtaining access to the knowledge, ideas and vast on the job experience of other Workers; and
- The process provides an opportunity for all Workers to assist in project planning and design, as well as long-term policy issues.

The Heritage Minerals management are to consult with their Workers over which they have supervisory authority to enable the Workers to contribute to the making of decisions affecting their Health Safety Environmental and Quality on Heritage Minerals projects.

In addition to any legislative requirements to consult and whether or not the Health Safety Environmental and Quality on Heritage Minerals projects in question has a HSEQ Representative, consultation is required when risks to Health Safety Environmental and Quality arising from work at the Heritage Minerals project are assessed or when the assessment of those risks is reviewed including when compiling or reviewing Management Plans, procedures, Safe Work Method Statements (SWMS's) and Job Safety and Environmental Analysis (JSEA's).

10.2 Consultation Encouragement

This consultation may arise as an initiative of the Heritage Minerals management, or any Worker. The above requirement shall be met through, but is not limited to the following mediums:

- HSR Representatives.
- Health Safety Environmental and Quality Committee Meetings.
- Formal scheduled meetings such as those organised to compile statutory Management Plans, procedures, SWMS's and JSEA's.
- Pre-Start / Toolbox meetings; and

- HSEQ Discussions.

11 HEALTH AND SAFETY REPRESENTITIVES

11.1 HSR Election

Facilitating the process associated with the election of a Health and Safety Representative is a function of the HSEQ Team.

The Workers at Heritage Minerals may elect up to two of their colleges to be Health and Safety Representatives for the project for the term decided by the Workers. A Person elected as a Health and Safety Representative will be provided with the appropriate training as per legislative requirements.

If a Health and Safety Representative is not available when the project is considered unsafe by affected Workers, Workers at the project may elect two Workers who are able to inspect the project. Under these circumstances, a Worker elected is taken to be a Health and Safety Representative for the period a Health and Safety Representative is not available, and the project is considered unsafe by affected Workers.

However, a Worker must not act as a Health and Safety Representative unless the Worker holds the competencies required by the applicable legislation. A Health and Safety Representative must perform the functions and exercise the powers of a Health and Safety Representative for Health Safety Environmental and Quality purposes and for no other purpose.

A Worker stops being a Health and Safety Representative if the Worker tells the Project Manager that the Worker resigns as Health and Safety Representative, or stops being a Worker at the project or is removed from the position by a vote of Workers.

11.2 HSR Functions

A Health and Safety Representative for Heritage Minerals has the following functions:

- To inspect the project to assess whether the level of risk to Workers is at an acceptable level.
- To review procedures in place at the project to control the risk to Workers so that it is at an acceptable level.
- To detect unsafe practices and conditions at the project and to take action to ensure the risk to Workers is at an acceptable level; and
- To investigate complaints from Workers at the project regarding Health Safety Environmental and Quality.

The Project Manager must give reasonable help and support to the Health and Safety Representative in carrying out the representative's functions. The Project Manager who is a risk owner may accompany the Health and Safety Representative during a HSEQ Audit or inspection.

11.3 HSEQ Audit and Inspection

A Health and Safety Representative who conducts a HSEQ Audit or Inspection of the project must:

- Make a written report on the HSEQ Audit or Inspection.
- Gives a copy of the HSEQ Audit or Inspection to the Project Manager.
- If the HSEQ Audit or Inspection indicates the existence or possible existence of danger, immediately notify the Project Manager; and

- Send a copy of the HSEQ Audit or Inspection to a Safe Work inspector if not closed out in seven days including the Project Manager.

If a Health and Safety Representative believes the any of the Management Systems is inadequate or ineffective, the Health and Safety Representative must inform the HSEQ Team as soon as possible.

If the Health and Safety Representative is not satisfied the HSEQ Team is taking the action necessary to make the any of the Management Systems adequate and effective, the Health and Safety Representative must advise a Work Safe Inspector including the Project Manager.

A Health and Safety Representative for Heritage Minerals has the powers as specified in the WHS Act and WHS Regulations.

12 RISK MANAGEMENT DOCUMENT DEVELOPEMENT

12.1 HSEQ Documents

A Project Manager charged with the development of a Risk Management document is to ensure the following steps are taken:

- Consult with a cross-section of the Workers involved in carrying out a task under the proposed Risk Management document to identify the hazards associated with the task and ways of controlling the hazards.
- Prepare a draft Risk Management document and give a copy of it to the Workers who were consulted; and
- If the Workers agree with the draft Risk Management document the Project Manager must prepare it as the final draft Risk Management document.

12.2 Decision Approval

If the Workers do not agree with the final draft Risk Management document:

- For a disagreement that is not about legal or technical matters, the Project Manager must decide the disagreed matter under legislative requirements and prepare the final Risk Management document for use.

12.3 Decision Disagreement

For a disagreement that is about a legal or technical matter the Project Manager must:

- Obtain further information or advice, including, for example, from a person having the necessary qualifications and experience to give the advice or from a recognised text on the matter.
- After consulting with the Workers about the information or advice, prepare a further draft Risk Management document and give a copy of it to the Workers; and
- If the Workers disagree with the further draft decide the disagreed matter and prepare the final Risk Management document.

12.4 Management Systems

The process described above must be applied by a Project Manager charged with the development of a Management System for controlling risks at the project associated with:

- The excessive consumption of alcohol.
- Personal fatigue.
- Psychological impairment.
- An impairment caused by stress or illness; and
- The improper use of drugs.

13 PRE-START / TOOLBOX MEETINGS

13.1 Scheduled Pre-Start / Toolbox meetings

All Workers must attend mandatory daily Pre-Start / Toolbox meeting as directed by the Heritage Minerals Project Manager who have the authority to give the directive. A mandatory daily Pre-Start / Toolbox meeting shall be held project wide being mandatory for everyone at the project to attend and sign off as understanding and engaging in the Pre-Start / Toolbox meeting.

A Pre-Start / Toolbox meeting must be designed to formally train a group of individuals in HSEQ activity skills and or knowledge.

Where applicable to the project, the following matters must be subject to a Pre-Start / Toolbox meeting at least, on a daily basis unless otherwise exempt by the Project Manager:

- Daily operational aspects.
- Health Safety Environmental and Quality.
- Deliveries.
- HSEQ Alerts, orders or publications issued by statutory bodies.
- Updates on such matters as legislative changes, industry body 'best practice information' and amendments to the any of the Management Systems; and
- Reminders concerning specific requirements expressed in the any of the Management Systems and associated Management Plans, procedures, Safe Work Method Statements or Job Safety and Environmental Analysis.
- Health Safety Environmental and Quality Responsibilities and rules regarding behaviour.
- Hazard identification, reporting and risk assessment.
- Manual handling.
- Alcohol drugs and fatigue.
- Noise conservation.
- Plant, including mobile plant and traffic rules.
- Out-of-service requirements.
- Procedures.
- Hazardous substances and dangerous goods Safety.
- Actions on incidents and incident reporting; and
- Electrical Safety.

The following matters must be subject to a Pre-Start / Toolbox meeting on an as required basis:

- The content of new or reviewed Management Plans, procedures, SWMS's and JSEA's; and
- A review of hazard and risk reports, audit results, inspection results, and results of incident investigations.

13.2 Pre-Start / Toolbox meeting Encouragement

Workers interaction and feedback is to be encouraged at each Pre-Start / Toolbox meeting. Pre-Start / Toolbox meetings are to be recorded on the Pre-Start / Toolbox meeting Form. The Project Manager, HSEQ Teams who facilitated the Pre-Start / Toolbox meetings are to retain a record of the Pre-Start / Toolbox meeting in accordance with the document control requirements of the Heritage Minerals any of the Management Systems. A record of a Pre-Start / Toolbox meeting must be kept for a minimum period of five years.

The Pre-Start / Toolbox meeting record must state who facilitated the Meeting, any comments made by those attending, items closed out from the previous Pre-Start / Toolbox meeting and who attended bearing signatures.

The record of Subcontractors Pre-Start / Toolbox meetings is subject to audit by the HSEQ Team and must be produced on request.

13.3 Same Information Project Wide

A direction by the Project Manager for a Sub-Contractor or others to promulgate information to all its Workers or a specific group of Workers is to be complied with. In these circumstances, the message must be delivered as if the message was being delivered by the Project Manager, HSEQ Teams.

14 COMMUNICATION

14.1 Internal Communication

Internal environmental communications have been implemented to ensure those Workers at each relevant level and function is aware of the following:

- The environmental management system.
- The importance of conformance with the environmental policy, procedures and system.
- The potential consequences of system non-conformances.
- Individual roles and responsibilities in achieving conformance with procedures, including emergency management; and
- The significant environmental aspects associated with work activities and the environmental benefits of improved Worker performance.

Internal environmental communications may be accomplished by the use of:

- Notice boards.
- Environmental training, in line with job function and identified within the training register as required.
- Newsletters.
- Electronic notes.
- Team meetings / Pre-Start / Toolbox meeting and meeting minutes.
- Management reviews and meeting minutes.
- Corrective Actions requests.

14.2 Chain or Communication

Communication of environmental issues by Workers can be done directly to their designated supervisor or the HSEQ Team who will escalate the issue to the Management Team. These communications shall be documented.

14.3 Communicating Legal Obligations

Communication of changes to legal obligations shall be handled by the HSEQ Team in any way and forum as deemed appropriate for the project. These communications shall be documented.

14.4 HSEQ Reports

Environmental management issues and reviews are to be completed in conjunction with the safety issues and reported within the monthly / annual reporting schedule, using the Heritage Minerals designated format.

14.5 Reporting Incidents

In the event of an environmental incident or emergency (i.e., spill, damage to flora), the incident is to be reported immediately to the local Supervisor and HSEQ Team to be escalated up the Heritage Minerals chain using the incident report form as per incident reporting requirements. The outcomes of the investigation will be communicated to the key stakeholders for the corrective actions to be designated and implemented.

Where community concerns relate to an environmental concern, incident or nonconformity, the environmental complaints process shall be implemented.

In the case of environmental incident, the HSEQ Team is responsible for determining the need for and preparation of any notification to regulatory agencies on an as needed basis.

14.6 External Communication

Communication on environmental issues and performance of the Heritage Minerals business with external entities will be completed as required by the designated management or HSEQ Team.

14.7 Environmental Aspects and Impacts

External communications concerning the environmental aspects and impacts of Heritage Minerals are to be completed by the HSEQ Team or designated management only when required and approved by the senior management team.

14.8 Media Communication

Only the designated Media communication Team, headed by the SSE are permitted and responsible for responding to media communications.

14.9 Monitoring and Measurement

Where any Environmental controls have been implemented, the HSEQ Team shall perform a formal HSEQ Audit of the project and work crew to assess the effectiveness of the corrective actions implemented via this procedure.

If any non-compliance is observed, the details shall be included on the HSEQ Audit Form and recommendations entered and recorded on the form. When the Corrective Action is taken it shall be recorded in the Corrective Actions Register for close out.

15 TRAINING REQUIREMENTS

15.1 Training Maintenance

Training will be conducted in accordance with the National Training and Assessment Criteria of Australia. The type of training will typically include but not be limited to any requirements under statutory legislation.

Heritage Minerals shall supply the provision of any information, training, instruction or Supervision that is necessary to protect all Workers from risks to their Health Safety Environmental and Quality arising from work carried out as part of the conduct of Heritage Minerals or undertaking shall be given. A Training Needs Analysis will be completed where required for all Heritage Minerals Operations.

The Heritage Minerals Training Matrix is maintained for all Workers involved in the Heritage Minerals Operations. The Training Matrix will follow the Heritage Minerals Training Matrix format. All Worker records will be maintained on the Training Matrix, kept up to date and reviewed on a monthly basis to ensure that all records are accurate and complete.

16 PROCEDURE REVIEW

16.1 3 Yearly Review

This Procedure may be reviewed from time to time by the Site Senior Executive or the HSEQ Team, a review shall be mandatory every 3 years or before according to changes or circumstantial needs. New Procedures may be introduced or amended should the Site Senior Executive or the HSEQ Team determine that it is needed and appropriate to do so. Updates of the Procedures will be made available. Procedures are to be read in conjunction with the references below. All Risks associated with this Procedure will be assessed and controlled in accordance with the Hierarchy of Control ISO 31000.

17 REFERENCE DOCUMENTS

17.1 Standards

| Document Number: | Document Title: |
|------------------|----------------------------------|
| ISO 14001:2015 | Environmental Management Systems |

17.2 EMS Management Plans

| Document Number: | Document Title: |
|------------------------|-------------------------------|
| HM-MMM-ENV-PLN-001-ROA | Environmental Management Plan |

17.3 EMS Policies

| Document Number: | Document Title: |
|------------------------|-----------------|
| HM-MMM-ENV-POL-001-ROA | Environmental |

17.4 EMS Procedures

| Document Number: | Document Title: |
|------------------|-----------------|
|------------------|-----------------|

| | |
|------------------------|--------------------------------|
| HM-MMM-ENV-PRO-001-R0A | Legal Obligations Procedure |
| HM-MMM-ENV-PRO-002-R0A | Risk Management |
| HM-MMM-ENV-PRO-003-R0A | Objectives and Targets |
| HM-MMM-ENV-PRO-004-R0A | Monitoring and Measurement |
| HM-MMM-ENV-PRO-005-R0A | Dust and Air Management |
| HM-MMM-ENV-PRO-006-R0A | Waste Management |
| HM-MMM-ENV-PRO-007-R0A | Water Management |
| HM-MMM-ENV-PRO-008-R0A | Noise and Vibration |
| HM-MMM-ENV-PRO-009-R0A | Heritage and Cultural |
| HM-MMM-ENV-PRO-010-R0A | Hazardous Substances |
| HM-MMM-ENV-PRO-011-R0A | Flora Management |
| HM-MMM-ENV-PRO-012-R0A | Fauna Management |
| HM-MMM-ENV-PRO-013-R0A | Fire Management |
| HM-MMM-ENV-PRO-014-R0A | Consultation and Communication |
| HM-MMM-ENV-PRO-015-R0A | Audit and Inspection |
| HM-MMM-ENV-PRO-016-R0A | Management Review |
| HM-MMM-ENV-PRO-017-R0A | Emergency Management |
| HM-MMM-ENV-PRO-018-R0A | Stakeholder Consultation |
| HM-MMM-ENV-PRO-019-R0A | Document Control |
| HM-MMM-ENV-PRO-020-R0A | Procurement |
| HM-MMM-ENV-PRO-021-R0A | Soil Management |
| HM-MMM-ENV-PRO-022-R0A | Incident Reporting |

17.5 EMS Registers

| Document Number: | Document Title: |
|------------------------|-----------------|
| HM-MMM-HSE-REG-001-R0A | HSEQ Registers |

17.6 EMS Forms

| Document Number: | Document Title: |
|------------------------|---------------------------------|
| HM-MMM-ENV-FRM-001-R0A | Environmental Compliance Matrix |
| HM-MMM-ENV-FRM-002-R0A | Management Review Meeting |
| HM-MMM-ENV-FRM-003-R0A | Management System Audit |
| HM-MMM-ENV-FRM-004-R0A | Weed and Seed Declaration |
| HM-MMM-ENV-FRM-005-R0A | HSEQ Induction Questionnaire |
| HM-MMM-ENV-FRM-006-R0A | Pre-Start-Toolbox |

| | |
|------------------------|----------------------------------|
| HM-MMM-ENV-FRM-007-R0A | Contractor Evaluation |
| HM-MMM-ENV-FRM-008-R0A | EMP Review |
| HM-MMM-ENV-FRM-009-R0A | HSEQ Monthly Report |
| HM-MMM-ENV-FRM-010-R0A | Annual EA Audit |
| HM-MMM-ENV-FRM-011-R0A | Objectives and Targets Guideline |
| HM-MMM-ENV-FRM-012-R0A | Aspects and Impacts Guideline |
| HM-MMM-ENV-FRM-013-R0A | HSEQ Monthly Audit |
| HM-MMM-ENV-FRM-014-R0A | HSEQ Inspection |
| HM-MMM-ENV-FRM-015-R0A | Water Testing |
| HM-MMM-ENV-FRM-016-R0A | Erosion and Sediment Audit |
| HM-MMM-ENV-FRM-017-R0A | Corrective Action Plan |
| HM-MMM-ENV-FRM-018-R0A | Fauna Inspection |
| HM-MMM-ENV-FRM-019-R0A | Heritage Inspection |
| HM-MMM-ENV-FRM-020-R0A | Air Quality Inspection |
| HM-MMM-ENV-FRM-021-R0A | Waste Management |
| HM-MMM-ENV-FRM-022-R0A | Noise Audit |
| HM-MMM-ENV-FRM-023-R0A | Ground Disturbance Permit |
| HM-MMM-ENV-FRM-024-R0A | EMS Document List |
| HM-MMM-ENV-FRM-025-R0A | Environmental Risk Assessment |
| HM-MMM-ENV-FRM-026-R0A | Management Observation |
| HM-MMM-ENV-FRM-027-R0A | Emergency Contact |
| HM-MMM-ENV-FRM-028-R0A | Emergency Drill |
| HM-MMM-ENV-FRM-029-R0A | Incident Notification |
| HM-MMM-ENV-FRM-030-R0A | Vegetation Removal Permit |
| HM-MMM-ENV-FRM-031-R0A | SWMS |
| HM-MMM-ENV-FRM-032-R0A | JSEA |
| HM-MMM-ENV-FRM-033-R0A | Incident Investigation |
| HM-MMM-ENV-FRM-034-R0A | Chemical Risk Assessment |