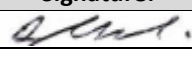






STAKEHOLDER CONSULTATION PROCEDURE

Document Quality Review Process				
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Action:	Name:	Position:	Signature:	Date:
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Reviewed by:	Darrin Usher	Engineering Consultant		01/11/2020
Approved by:	Peter Mellor	Site Senior Executive		01/11/2020
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1 PURPOSE

The purpose of this Emergency Management procedure is to provide adequate pre-emergency, implement, management and recovery of planning in the event of an Emergency to ensure the Health and Safety of all Workers and to prevent property and asset loss on the project.

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, apprentices, trainees and outworkers. Note: a 'person' in this context can include a whole business or government agency.
Competent Person	- 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.
Visitor	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.
project	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.
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	Aspect means those elements of Heritage Minerals activities, products or services that can interact with the environment can or does interact with the 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 Sub-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-R0A-Environmental	Rev Date:	01/11/2020	Rev No.:	0A	Page:	1 of 1

7 ROLES AND RESPONSIBILITIES

7.1 project Responsibilities

Position:	Definition:
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 Worker 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.
- 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

Supervisors are responsible for:

- 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

Workers are classified as any person who carry out work, in any capacity, for a PCBU. Workers must:

- 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 STAKEHOLDER CONSULTATION PROCEDURE

10.1 Stakeholder Management

Heritage Minerals has developed a database of Stakeholders. This database is a live document and is used to ensure information is distributed to relevant Stakeholders, and that a record of communication with Stakeholders remains up to date.

This Stakeholder Consultation procedure will build on existing relationships, provide an avenue for new Stakeholders to be informed and ensure there is an ongoing dialogue between The Heritage Minerals project and the Stakeholder groups. The project has identified that being transparent with Stakeholder groups is critical to the project's success, including:

- Government Authority - Department Resources.
- Heritage Minerals Sub-Contractors.
- All Workers.
- Interest groups from a Heritage aspect.
- Community organisations, including locals looking for work.
- General public or Visitors the project.
- Consultants.
- Landowners, adjacent to the lease.
- Client; and
- Persons or businesses affected by the development.

Initial consultation activities will reconfirm that this list represents all Stakeholders and that the current database is still up to date.

11 ENGAGEMENT PARAMETERS

11.1 Geographic

Geographically the project aims to ensure that all people living in the community and surrounding area have the opportunity to obtain information and provide feedback about the project development and the partners within the Heritage Minerals project.

The Heritage Minerals project will determine the geographic engagement boundary through meetings and conversations with local community members and groups.

Communities within the immediate vicinity of the project will remain the key area of focus for engagement activities.

11.2 Legislative Requirements

The Heritage Minerals project must comply with:

- The contract.
- Planning conditions.
- Environmental Authorisation (EA).
- Environment Legislation.
- WHS Legislation and other Legislation relevant to the project.
- Commitments made through the Stakeholder Consultation procedure; and
- Commitments made through the project in general.

12 KEY ASPECTS

The top six key themes identified in this Stakeholder Consultation procedure are critical components of the project's development from the community's perspective include:

1. Risk and Impacts on any of the parties involved.
2. Employment,
3. Environment.
4. Product.
5. Infrastructure; and
6. Security.

While these themes will be reviewed with Heritage Minerals to confirm they still represent the top priorities for the community, it is assumed in this Stakeholder Consultation procedure that they still represent the most critical aspects of the project, from a community perspective.

Heritage Minerals will develop criteria that measure the project's success against these key themes. This set of criteria will be critical to the evaluation of the Stakeholder Consultation procedure.

13 MANAGEMENT STRATEGY

13.1 Phase One - Maintenance

Activity:	Details:	Time Frame:
Direct notification.	Heritage Minerals shall create a direct notification (letter, email, phone call or visit) to all recorded Stakeholders providing updates on the new project size and contact information. Seek opportunity to meet and present. Also notify through https://www.linkedin.com/company/heritage-minerals/	Letters have been issued by Heritage Minerals.

Meetings and Presentations.	Heritage Minerals has met with key Stakeholders such as Council, Indigenous groups, project neighbours.	At least monthly.
Set up Community Group.	Heritage Minerals has set up a Community Group to develop the criteria that will identify how the community will measure the project's success. Community Group will also provide an opportunity for regular project updates to be provided to key Stakeholders and an opportunity to get community input into the Stakeholder Consultation procedure.	This should be an output from meetings, presentations and posts. It will take a little while to set up as buy-in from Stakeholder groups must be sought. Aim for first meeting of Community Group should be before pre-construction starts to allow about 4 months for evaluation criteria to be developed. These criteria may also inform aspects of the Contract requirements.
Dedicated Stakeholder Liaison.	Heritage Minerals will appoint, and make contact details (phone, email and mailing address) known for a first point of contact for the community.	Heritage Minerals will provide this asset, at present the community liaison is the SSE.
Develop marketing materials for distribution that give the project a visual identity and communicate key messages.	Heritage Minerals shall develop a project overview brief, FAQ's and other materials as required. Material will provide clear information about the Heritage Minerals project, including information for accessing further details about the project and the contact information or the Stakeholder Liaison Officer.	Ongoing through https://www.linkedin.com/company/heritage-minerals/ .
Set up and maintain Complaints / Comments register.	This is to be managed and set up by Stakeholder Liaison Officer.	Has been set up before pre-construction.
Participate in local events.	Heritage Minerals shall hold a community information market stall at appropriate community events as another way to share information with the community.	LinkedIn On line posts may be the most appropriate place to attend on a regular basis and liaise with the community and the Council - https://www.linkedin.com/company/heritage-minerals/ .
Liaise with Employment networks including Indigenous Employment	Further links with local employment networks including Indigenous employment contacts with the aim of undertaking skills gap analysis (possibly via consultancy). Note, a key focus area for The Heritage Minerals project is to identify and provide Indigenous employment	Ongoing though Training Needs Analysis.

offices to further a skills gap analysis.	opportunities. In order to ensure job opportunities can be realised we must understand current skills that exist within the community. A skills gap analysis will be critical in building local job targets in the contract.	
Strategic media placement, briefings and updates.	Heritage Minerals to proactively seek out appropriate opportunities to promote details about the project via the local media (free or paid advertising) and ensure local media have the most up to date information about the project, and contact details for The Heritage Minerals project Media queries shall be passed onto Heritage Minerals.	Media is important to Stakeholders, however it is important that we seek to liaise with Stakeholders directly first, and through the media afterwards. Therefore, timings for media coverage will be dependent on Stakeholders meetings All communication will be in line with communications protocol.
Work proactively with the project to ensure the contract includes requirements to meet Community Group key criteria from which the project's success will be measured.	Work proactively with the Heritage Minerals project to ensure that relevant criteria that will be the way the community measure the project's success is built into the contract requirements. Ensure that all community engagement requirements are adhered to.	Ongoing.

13.2 Phase Two - Construction

Timing for these activities is unknown at this time. Once commercial feasibility is determined and construction timeline is outlined these details will be updated in this activity list.

Activity:	Details:	Time Frame:
Adhere to planning permit (EA) and conditions.	Ensure all relevant planning permit conditions related to community engagement and communications are adhered to.	Ongoing
Local Stakeholder Liaison Officer.	Heritage Minerals Stakeholder Liaison Officer (CLO), the SSE will ensure the community has an easily accessible and responsive	Ongoing

	<p>first point of contact for queries, information and complaints. The CLO will proactively develop relationships with key Stakeholders, manage complaints requisite and work proactively to address potential issues and minimise construction impacts on residents.</p>	
Update marketing materials	<p>Heritage Minerals shall update project materials to detail construction timeline and activities and FAQ. Website should also be updated.</p>	<p>Ongoing – https://heritageminerals.com.au/, https://www.linkedin.com/company/heritageminerals/; and https://www.linkedin.com/company/pt-green-gold-engineering/.</p>
Regular newsletter / construction update	<p>Heritage Minerals shall develop and distribute regular newsletters for distribution to Stakeholders. The newsletter will provide details about current construction activities and a timeline of construction. It will also include contact details of the website and CLO. Newsletters would be additional to updates provided via Community Groups. All newsletters would form the basis of updates to Website and LinkedIn.</p>	<p>Ongoing, as above.</p>
Participate in local events.	<p>Hold an information stand market stall at appropriate community events as another way to share information with the community.</p>	<p>If available, more research required.</p>
Ongoing presentations and meetings.	<p>Ongoing presentations and meetings with Community Groups and other key Stakeholders to share information and updates about project construction.</p>	<p>Ongoing</p>
Strategic media placement, briefings and updates.	<p>Proactively seek out appropriate opportunities to provide detail about the project and construction via the local media (free or paid advertising -</p>	<p>Ongoing</p>

	LinkedIn) and ensure local media have the most up to date information about the project.	
Regular meetings between CLO and project manager during construction.	CLO should be part of any Pre-Start/Toolbox meeting or relevant meetings regarding construction to ensure most up to date information is available for community and to inform any changes to construction timelines.	Ongoing
Maintain complaints register	This is to be managed by the Stakeholder Liaison Officer	This carries over from phase 1 through online form – Heritage Minerals Complaint/Feedback Register Form.

14 ENGAGEMENT

In line with best practice, this Stakeholder Consultation procedure uses the IAP2 spectrum when developing techniques. The aim is to move along the spectrum as far as practicable for each individual Stakeholders group and each decision to be made.

Spectrum:	Examples of Techniques:
Inform:	<ul style="list-style-type: none"> • Progress report. • Fact sheet. • Website. • LinkedIn. • Information stand.
Consult:	<ul style="list-style-type: none"> • Public meetings. • Comment forms. • Interviews.
Involve:	<ul style="list-style-type: none"> • Workshops. • Tours and field trips.
Collaborate:	<ul style="list-style-type: none"> • Ongoing advisory groups (Community Group). • Focused conversation.

14.1 Engagement Technique

Technique:	Details:	Target Audience:	Notification:	Spectrum:
Advertising.	Advertise all public meetings, where to gather information, contact details.	All Stakeholders	Advertisement. Website; and LinkedIn	Inform
Comment form.	A comment form will be available at all meetings and on Heritage Minerals website to ensure Stakeholders have an	All Stakeholders	Heritage Minerals Complaint/Feedback Register Form.	Consult

	opportunity to provide feedback to the Heritage Minerals project about how we are engaging with them, what they think of the project and where we can improve our processes.			
Stakeholder Liaison.	Heritage Minerals shall appoint a Stakeholder Liaison person.	All Stakeholders	Contact details to be included on all communication	Heritage Minerals SSE.
Community Group.	Set up a Community Group to determine the criteria by which the community will evaluate the project's success, help facilitate the distribution of information and be the key voice of the community to the project.	All Stakeholders	Advertisement Letters Media release Presentations	Collaborate
Information stand.	Information stall at the local markets or similar as well as an information booth at the local library or council chambers once per month. The Heritage Minerals project partner information will be available as well as the ability for attendees to leave comments.	Stakeholders.	Letters Advertisements Media release - Website; and LinkedIn.	Inform / Consult.
Media releases.	Issue media releases as relevant such as advising that the project re-engaging with the community, partners will be available to discuss project at an information session etc.	All Stakeholders.	Media release.	Inform.
Meetings / Presentations.	Meetings with Stakeholders to inform them on the updated project, introduce the Heritage Minerals project partners, discuss their concerns, questions, issues of importance. Knowledge sharing.	Community Groups.	Letters.	Consult.

15 COMMUNITY GROUPS

15.1 Purpose

- To design criteria by which the community will evaluate the project's success (criteria to be determined against key themes identified in previous consultation); and

- To provide a vehicle for all Stakeholders to have regular access and updates from The Heritage Minerals project.

15.2 Participants

- Ideally a member from each Stakeholders group will be represented on Community Group, however Community Groups will be open to any Stakeholders group who feel they should be represented.
- Participants will be identified via consultation with Stakeholders to ensure it is an inclusive group; and
- Community Group participants must have a clear role.

15.3 Time Frames

- Planning will take time as meetings with Stakeholder groups will be undertaken to introduce the concept, create buy-in and ensure the group is inclusive.
- Meetings must be planned and announced in advance. Suggest a monthly meeting starting before construction; and
- Materials need to be distributed in advance.

15.4 Terms of Reference / Charter

The charter should include the following:

- Purpose of the group (what decisions will the group make?).
- Composition and size.
- Leadership (Le. rotating chairperson).
- Term limitation (usually 2 years or less).
- Turnover, recruitment, selection (i.e., replacement should come from same stakeholders group).
- Decision processes (majority or consensus).
- Meeting frequency and duration.
- Roles/responsibilities of members (i.e., must attend 80% of meetings, media spokesperson, must discuss decision to be made with stakeholders group).
- Relationship with broader community; and
- Authority levels (members must have authority to make decision for their stakeholders group).

15.5 Implementation

- Ideally a trained facilitator will run community group process. The person should not be from the project or Heritage Minerals.
- Community Group must always know how their input will be used; and
- Heritage Minerals must commit to work with community group in a constructive, open and transparent manner.

15.6 Documentation

- Minute taker needed - possibly from Heritage Minerals.
- Heritage Minerals will display agenda and minutes on website; and
- Community Engagement team will advise community group on how their recommendations have been implemented.

15.7 Resources

- Heritage Minerals staff (CLO for example).
- Facilitator.
- Administration support; and
- Venue/equipment.

15.8 Marketing Materials

Item:

- Website.
- LinkedIn.
- project Summary.
- Information sheet on the project.
- Business Cards.
- Brand Guidelines.
- Maps – including project layout and traffic routes; and
- Googles Comment / Feedback Forms.

16 COMPLAINT AND FEEDBACK MANAGEMENT

16.1 Phase One

During Phase 1, Heritage Minerals Communication and HSEQ Teams will handle any complaints and feedback from the community, A complaints form and register have been supplied by Heritage Minerals.

16.2 Evaluation

An audit of the community engagement will establish if the Stakeholder Consultation procedure meets best practise requirements and regular reviews of the Stakeholder Consultation procedure will allow for adjustments to the activities proposed, as required.

Evidence of the success of the Stakeholder Consultation procedure will be sought by collecting feedback from Stakeholders either anecdotally or through a survey, so ultimately the Stakeholder Consultation procedure will be deemed a success if all objectives have been achieved.

However, the project's success will be measured against the criteria determined by Heritage Minerals. A Community Group is the primary tool by which engagement will take place with Stakeholders. Community Groups are designed to provide a very empowering opportunity for the community to work in collaboration with the Heritage Minerals project.

16.3 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.

17 TRAINING REQUIREMENTS

17.1 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.

18 PROCEDURE REVIEW

18.1 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.

19 REFERENCE DOCUMENTS

19.1 Standards

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

19.2 EMS Management Plans

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

19.3 EMS Policies

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

19.4 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

19.5 EMS Registers

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

19.6 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