

CSA- ENV-MAN-028

EMS Manual

Approvals

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Revisions

	Date	Description	By	Check	Approved
1	8/04/2024	EMS Manual	MP	HR	MP

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1. INTRODUCTION

The CSA mine is located 11km north of Cobar, in western NSW in the Cobar Shire Council (CSC) Local Government Area (LGA). Cobar is located 600km northwest of Sydney and is serviced by the sealed Barrier Highway which is part of the road network that links Sydney and Adelaide via Broken Hill. The CSA mine is serviced by a 132kV and 22kV powerline and rail infrastructure that transports the concentrate product to the Port of Newcastle for export.

Cobar Management Pty Ltd (CMPL) is the legal entity and owner of the CSA mine. Metals Acquisition Limited is listed on the New York Stock Exchange and completed its first acquisition in June 2023 with the acquisition of the CSA Copper Mine in Cobar from Glencore Operations Australia Pty Limited, a wholly owned subsidiary of Glencore plc.

The Transaction was implemented through the acquisition by MAC's wholly owned subsidiary Metals Acquisition Corp. (Australia) Pty Ltd of all the issued share capital of Cobar Management Pty Limited ("CMPL"), a wholly owned subsidiary of Glencore, which owned CSA.

CSA is an established, high grade, producing, underground copper mine that has produced around 26,000 tonnes ("26kt") of copper in concentrate from January to September 2023, with an estimated mine life more than six years based on the current Ore Reserves (August 2023). In 2022, CSA produced 37kt of payable copper and 446 thousand ounces ("koz") of payable silver.

Mining has occurred intermittently on the CSA leases since the discovery of copper, lead and zinc in 1871. With mining commencing in the early 1900's focusing on surface outcrops, Underground mining commenced in the 1960's.

The CSA deposit is located within the Cobar mineral field in the Cobar Basin, a north-south mineralised belt containing copper, gold, and lead-zinc mineralisation, with five currently operating mines within 80km of Cobar. Mineralisation at the CSA mine is hosted within the Silurian-age CSA Siltstone, a steeply dipping sequence of interbedded siltstones and sandstones. Mineralisation is associated with north-south faulting and northwest cross cutting structures; studies indicate that reactivation of the faults played a significant role in providing fluid pathways for mineralising fluids and dilational zones for the formation of the mineral deposits.

The CSA mine operation is permitted under the Environmental Planning and Assessment Act 1979, through Development Approvals issued by the Cobar Shire Council. CSA Mine also holds relevant Mining and Mining Purpose Leases under the Mining Act 1992 and an Environmental Protection Licence issued under the Protection of the Environment Operations Act 1997.

CSA Mine is operating in compliance with the NSW Standard Conditions for Mining Leases – Rehabilitation Regulation 2021. CSA has completed the required Risk Assessment and Rehabilitation Management Plan (RMP) and has submitted the required Forward Program and Rehabilitation Objectives.

MAC completed its first acquisition on June 2023 with the acquisition of Cobar Management Pty Ltd (CMPL) which is the owner of the CSA Mine, Cobar. Metals Acquisition Limited (MAC) is listed on the New York Stock Exchange and is a company focused on operating and acquiring metals and mining businesses in high quality, stable jurisdictions that are critical in the electrification and decarbonisation of the global economy.

MAC was floated on the ASX as an Australian Copper Producer in Feb 2024. The head office and operating asset the CSA Mine are located at Cobar in Western NSW.

CMPL owns and operates the CSA Mine at Cobar in western NSW. The operation of the mine involves the underground mining of metal ore – predominantly copper ore, crushing and milling of this ore to produce a saleable copper concentrate product. The copper concentrate is transported from site in sealed containers via the existing rail network for export out of Newcastle or Mt Kembla port terminals.

The CSA produces approx 146,000 tonnes of copper concentrate per annum from an ore supply of 1,000,000 Mt at an average concentrate grade of 26-27%.

The CSA mine has a current Life of Mine (LOM) of another 6.5 years, it has approvals for the Southern Tailings Storage Facility (STSF) for the current stage 9 and future stage 10 which sees the current approved life of the STSF out to Nov 2030. STSF has a planned lift 11 or an alternate TSF to proceed the STSF stage10 operational life.

2. NORMATIVE REFERENCES

There are no normative references included in this document

3. TERMS AND DEFINITIONS

ANZECC	Australian and New Zealand Conservation Council	KPI's	Key Performance Indicators
ASX	Australian Securities Exchange	m	Metre
BBP	Balanced Business Plan	MAC	Metals Acquisition Limited
BIR	Biodiversity Inventory Report	MDB	Murray Darling Basin
BSafe	Electronic safety management system	ML	Mining Lease
CSA	Cornish, Scottish, Australian Mine	ML	Mega Litre
CML	Consolidated Mining Lease	MPL	Mining Purpose Lease
CMPL	Cobar Management Pty Ltd	NGERS	National Greenhouse and energy Reporting Scheme
CSC	Cobar Shire Council	NPI	National Pollution Inventory
CWB	Cobar Water Board	NSW	New South Wales
DA	Development Approval	NSW EPA	NSW Environment Protection Agency
EC	Electrical Conductivity	NSW RR	NSW Resources Regulator
EL	Exploration Lease	NTSF	Northern Tailings Storage Facility
EMS	Environmental Management System	NYSE	New York Stock Exchange
EPL	Environmental Protection Licence	pH	Ph level of acid/basic reading
ESP	Exchangeable Sodium Percentage	PIRMP	Pollution Incident Response Management Plan
GCOM	Site Communication Meetings	STIP's	Short Term Incentive Program
GHG	Green House Gas	STSF	Southern Tailings Storage Facility
GM	General Manager	t	tonnes
Govt	Government	TARP	Trigger Action Response Plan
ha	Hectare	TDS	Total Dissolved Solids
INX	Incident Reporting System	VWP	Vibrating Wire Piezometer
KM	Kilometre		

4. ORGANISATIONAL CONTEXT

4.1 Understanding the organisation and its context

MAC which is a dual listed entity on both the NYSE and the ASX is the owner of Cobar Management Pty Ltd (CMPL) which owns and operates the CSA Mine. MAC has identified external and internal environmental issues and has addressed these through their governance documents available on the Metals acquisition Limited website.

These MAC governance documents address external issues related to Environmental and Social Governance such as engaging stakeholders, demonstrating environmental responsibility, legal ethics and anti-bribery and corruption.

The MAC CSA Mine Sustainable Environment and Community Policy (Appendix 1) details the commitment at the CSA Mine for sustainable environmental practices and community growth which is applicable to the operations of the CSA Mine at Cobar, NSW.

The CMPL Environmental Risk Register is used to identify and manage risks associated with the operations including both internal and external related issues.

Internal issues such as culture, knowledge, values and performance are addressed through the MAC-CSA Mine – CSA Operational Excellence Policy, CSA Mine Health & Safety Policy, and Regulatory Compliance Policy.

4.2 Understanding the needs and expectations of interested parties

MAC has identified interested parties that are relevant to the EMS. These are listed in **Table 1**, which identifies the stakeholders as well as the requirements of these stakeholders.

Table 1 CSA Mine Stakeholders

Stakeholder	Needs and expectations	How key issues captured
Employees	Culture, Attitudes, Job Security	Employee Meetings, GCOM, consultation, employee feedback survey
Shareholders	Value, commitment, social responsibility	Monthly, quarterly and annual reports, Sustainability Report
Neighbours/ Local Community	Social responsibility, community engagement	Consultation and engagement, Land Access Agreements for exploration
Suppliers	Beneficial working relationships, ethics	Contract Management, Supplier reviews, Code of business conduct and ethics
Cobar Shire Council	Compliance with site Development Consents, Active participant in the Cobar economy	Consultation and engagement
NSW Resources Regulator	Compliance with the NSW Mining Act and Rehabilitation Provisions	Rehabilitation Management Plan, Annual Report and Forward Plan, Engagement and Site inspections
NSW EPA	Compliance with the EPL1864 and the Protection of the Environment Operations Act 1997	EPL annual return. Reportable incidents to Environment Line (if ever occur), Engagement and consultation on issues as required
Cobar Water Board	Compliance with NSW water Licence and CWB supply agreement	Monthly meetings
Crown Lands	Compliance with the NSW Mining Act and Relevant Legislation	Annual Report
Other govt agencies such as LLS	Compliance with the NSW Mining Act and Relevant Legislation	Consultation as required
Other mines	Mutual aid agreements for Emergency Management, Environmental Departments catch up for shared regional issues	Mutual aid agreements, consultation

4.3 Scope of EMS

This EMS focuses currently on the CSA mine site in Cobar NSW and any ancillary activities associated with the CSA mine site (**Figure 1**).

The scope includes

- Onsite works associated with the mining and milling of ore from the CSA Mine on CML5, ML137 and ML136
- The underground mining of ore and waste, crushing, hoisting, stockpiling and surface treatment of the ore into the final product (copper concentrate) which is transported offsite via the rail network
- The operations of ancillary site infrastructure such as bores, vent fans and the disposal of tailings to the tailing’s storage facility

- Exploration activities which occur on EL5693, EL5983, EL6223, EL6907, EL9587, EL9595, EL9596
- External services such as business partners, suppliers, contractors, consultants

The operational areas of the CSA Mine can be broken down into the following areas

- Underground Operations
- Milling Operations – including TSF and rail loading
- Store and Maintenance
- Exploration
- Administration

The scope of the EMS covers both employee activity and contractor activity who are working at or for the CSA Mine site.

This EMS provides the framework for environmental management at the CSA mine and supports the following subordinate documents.

Figure 1 identifies the CML5 boundary and shows the land tenure associated with the CSA Mine.

Figure 2 identifies the key assets located on the CSA Mine site.

Figure 3 identifies the current CMPL Tenure of Exploration licences and Mining Lease.

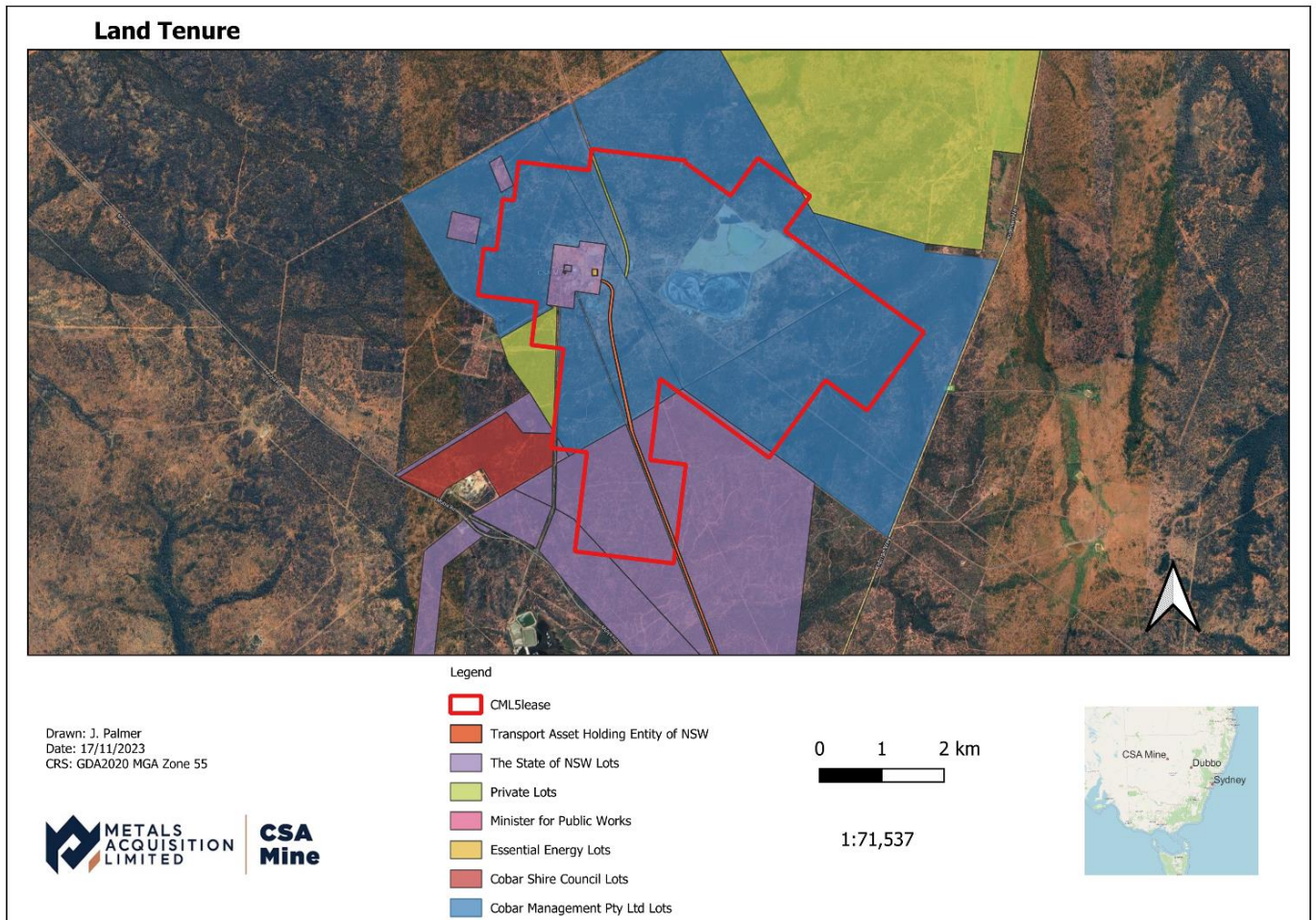


Figure 1 CSA Mining Lease and Land tenure

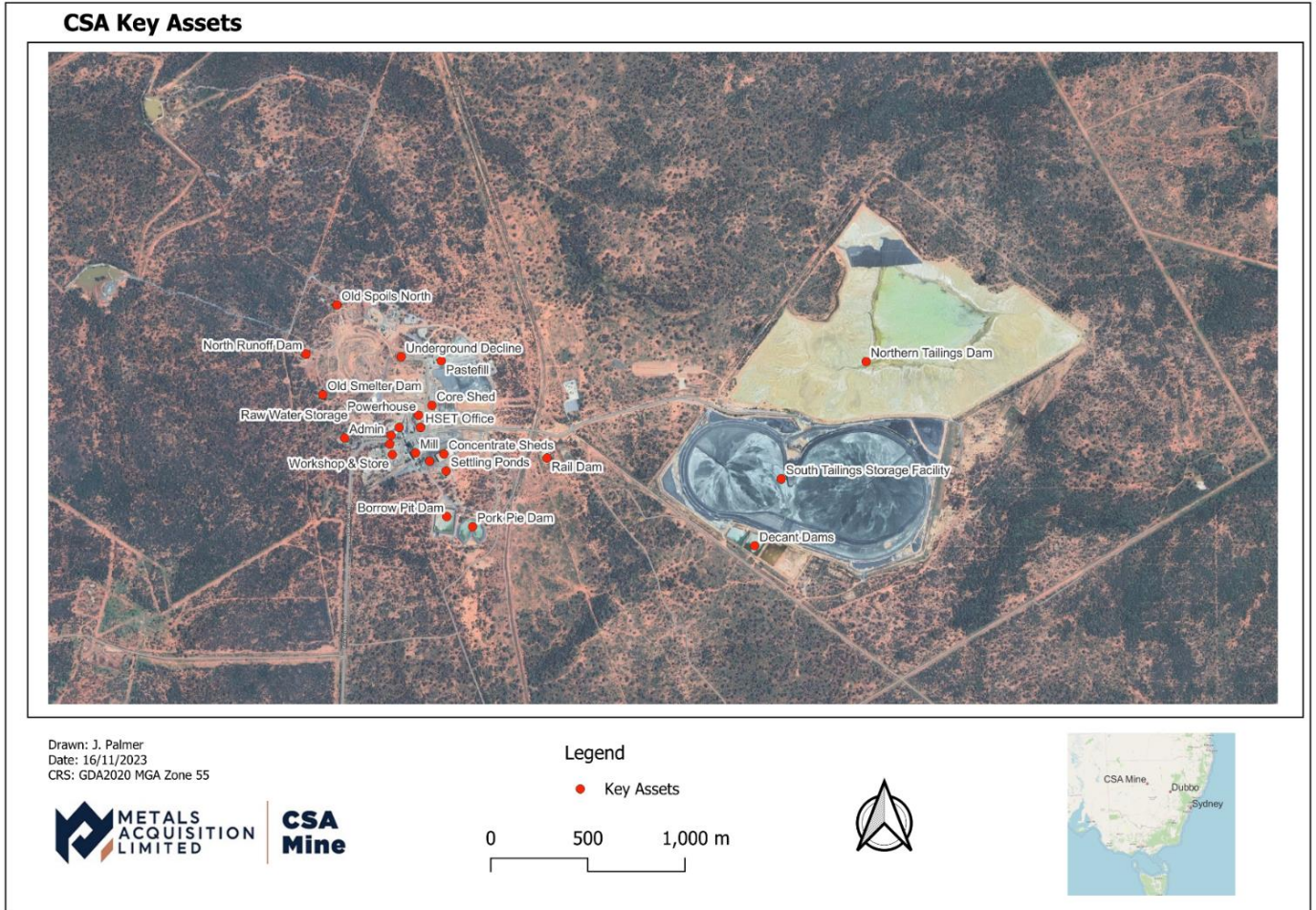


Figure 2 CSA Mine key Assets

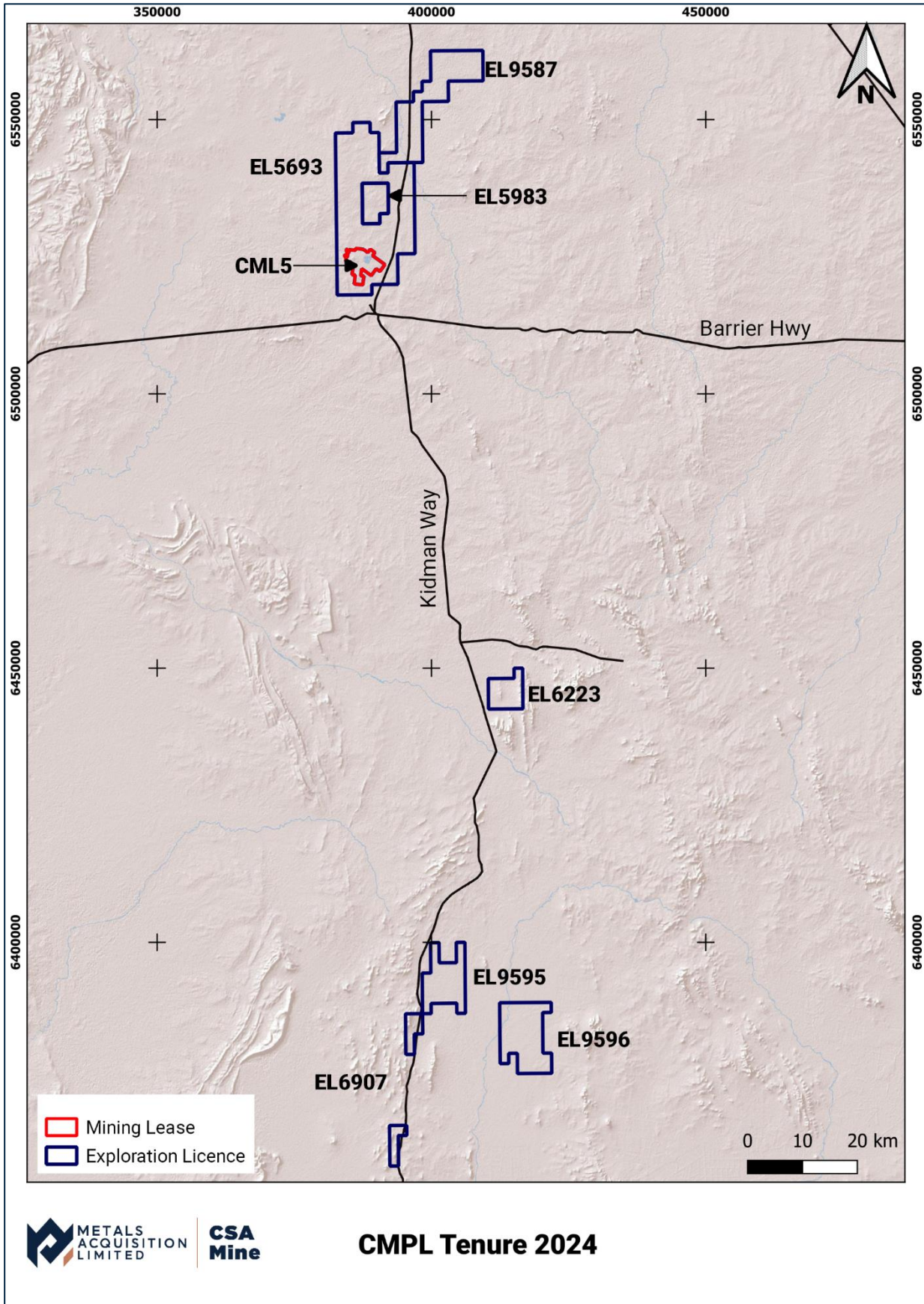


Figure 3 CMPL Tenure 2024

4.4 Environmental Management System

The EMS outlines the management process for management of environmental issues both internal and external and through the relevant policies and management plans subordinate to the EMS, details strategies for their effective management.

The management of environmental aspects and impacts onsite is specified within the environmental impacts and aspects register and the site Environmental Management Plan. The key items of management within the EMS are as per **Figure 4** below.

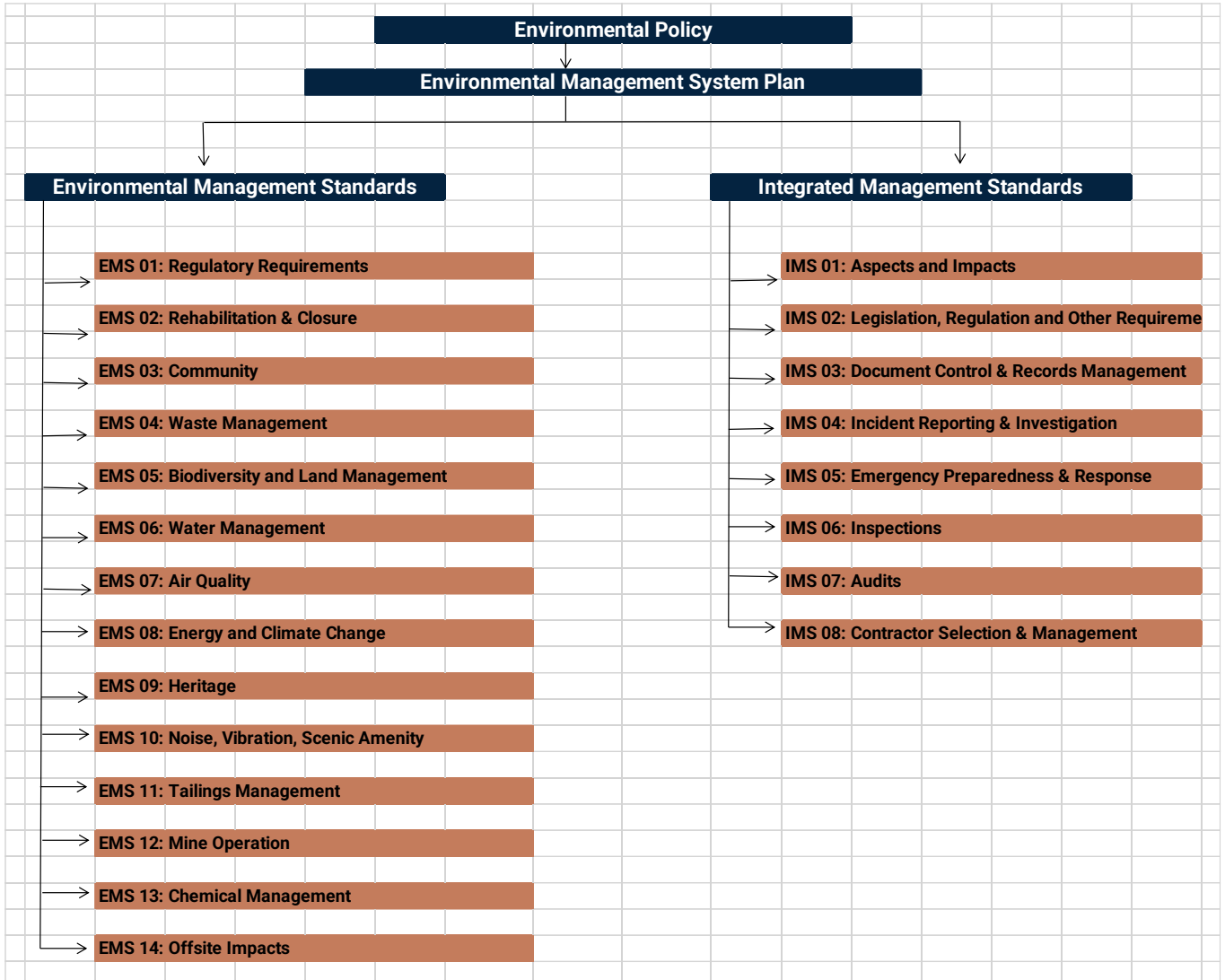


Figure 4 EMS document structure

4.5 Project Approval

The CSA Mine is approved under DA 31:95, pursuant to Section 92 of the Act. DA 31:95 was modified in 1998 to modify condition 1 to state the following:

“All activities to be carried out in accordance with the details in the attached statement of Environmental Effects as modified by the Annual Environmental Management Report and Mining Operations Plan approved from time to time by the Department of Mineral Resources.”

Table 2 details the approvals provided to CSA for ancillary works on the mine site, whilst **Table 3** outlines other statutory obligations for the CSA site.

Table 2 Project Approvals

Development Approvals		
Approval No	Description	Issue date
DA31/95	Original DA – Development of Underground Mine, Ore Treatment Plant, Tailings Dam and associated Service Facilities	26/06/1998
2004/LDA-00038	Refrigeration Plant	18/11/2004
2006/LDA-00009	South Tailings Dam Extension	22/6/2006
2006/LDA-00012	Erection of Portable Buildings.	7/6/2006
2007/LDA-00036	Upgrade of Workshop/ Storage Facility.	8/10/2007
2009/LD-00035	Tailings Dam Wall Raise.	4/7/2010
2013/LD-00037	South Tailings Storage Facility Upgrade (Stage 7).	9/27/2013
2014/LD-00015	Embankment Construction of South Tailings Storage Facility (Stage 8).	9/24/2014
2015/LD-00007	Installation of Steel Surface Fans.	5/13/2015
2019/LD-00006	Stage 9 Wall Raise – Tailings Storage Facility.	5/14/2019
2019/LD-00037	3 Mega litre Raw Water Tank including associated pipelines and pump	3/18/2020
2020/LD-00012	Installed Surface Vent Fans	11/10/2020
2020/LD-00010	Installed Jameson Cell	11/10/2020
2020/LD-00013	Installed Diesel Generator	11/10/2020
2020/LD-00011	Installed Bulk Air Cooler at No. 1 Shaft	11/10/2020
2020/LD-00048	Waste Rock Stockpile	12/8/2020
2020/LD-00051	Processing Plant upgrade – Replace two SAG mills	12/10/2020
2020/LD-00052	Installation of Tailings and Copper Thickener	12/14/2022
2022/LD-00018	Paste Fill Plant Building	11/3/2022
2022/LD-00046	Perimeter Embankment Stabilisation Earthworks to Tailings Dam	14/2/2023
DA23/025 now DA23/056 MOD	Extraction of Rock for Stage 10 Tailings Dam Wall Rise at Railway Dam Pit	22/8/2023
DA23/037	Perimeter Embankment Stabilisation Earthworks to Tailings Dam (Stage 10 Buttress)	19/9/2023
DA23/019	Stage 10 Wall Raise - Tailings Storage Facility	19/9/2023

4.6 Other Statutory Obligations

Table 3 Other Statutory Obligations

Other Approvals		
Approval No	Description	Issue date
CML5	Mining Lease for CSA Mine site. Licenced for Group 1 minerals (Ni, Sb, CD, BI, As, Co, Cu, Au, Ge, Pb, Fe, In, Ag, Se, S, ZN & Fe minerals)	02/12/1993
MPL 1093	Mining Purpose Lease for Water Harvesting. Not licensed for minerals.	05/02/1947
MPL 1094	Mining Purpose Lease for Water Harvesting. Not licensed for minerals	05/02/1947
EPL 1864	Environment Protection Licence	28/04/2014
Water Supply	River water via Cobar Water Board WAL36334, WAL36335, WAL36336 and WAL36337 Ground Water supply works 85WA753710, 2 ground water access licences WAL28539 and WAL28887	

Radiation Licence No 29023	Licence to sell/possess radiation apparatus and/or radioactive substances or items containing radioactive substances	
Bonded Asbestos Removal Licence No. 204696	For the onsite removal of bonded asbestos only	
Workcover Licence XSTR100157	Workcover NSW licence to store Class 5.1, 1.1D and 1.1B explosives	

5. LEADERSHIP AND COMMITMENT

5.1 Leadership and Commitment

Senior Management at CSA demonstrate leadership commitment to the Environmental Management System by

- Taking accountability for the effectiveness of the EMS
- Ensuring Environmental Policy and objectives are produced and in line with the business strategic direction
- Ensuring the resources required for the environmental management are available and
- Promoting continual improvement
- Developing and implementing the management of change process
- Being an active participant in the Management Review
- Promoting environmental projects and environmental improvements by linking business KPI’s to environmental performance

The EMS is reviewed for effectiveness and consistency and updated annually to be approved in consultation with the CSA General Manager and Executive Leadership team as part of the Management Review process (Section 8.1).

5.2 Environmental Policy

CSA Mine has a Sustainable Environment and Community Policy (**Appendix 1**), which underscores Metal Acquisition Limited’s unwavering commitment to environmental stewardship and positive community engagement. This policy guides the overall direction for environmental management at CSA.

All inducted personnel are made aware of their responsibilities in relation to the policy and is readily accessible through displays in prominent locations and the CSA intranet as well as the MAC website.

5.3 Organisational Roles, Responsibilities and Authorities

Environment management at CSA is everyone’s responsibility. MAC have a saying that we all act like owners and as such have a responsibility to act or operate in a way that is most beneficial to the success of the business including environmental requirements.

The following **Table 4**, shows specific position roles which also defines responsibilities and authorities associated with these positions.

Table 4 Role Responsibilities at CSA

Role	Responsibilities	Authority
General Manager	<ul style="list-style-type: none"> • Maintain knowledge of the EMS and associated regulatory and licence conditions • Provide adequate resources to support Environmental Management and regulatory compliance 	Authorise process changes to the Mill or UG or stop and suspend operations to meet required environmental obligations
Environmental Superintendent	<ul style="list-style-type: none"> • Update, implement and manage the EMS and associated Management Plans • Implement a process to manage environmental compliance including complaints, inductions, and regulatory reporting requirements • Advise on matters specific to licence conditions and relevant regulatory requirements and legislation • Audit and report on EMS effectiveness to the Site GM and Executive leadership team 	<p>Make recommendations to stop, suspend or modify operations to meet environmental compliance or best practice</p> <p>Liaise with Cobar Shire Council and other regulatory authorities regarding environmental and operational issues</p>

Environmental Advisor	<ul style="list-style-type: none"> • Implement environmental plans and strategies • Coordinate environmental monitoring, conduct environmental inspections, inductions, analysis and actions on monitoring results as required 	Liaise with site operational teams and personnel to implement corrective actions
Operational Managers /Superintendents	<ul style="list-style-type: none"> • Manage and plan activities under their control so they complement and adhere to the requirements of the EMS and site environmental management. • Effectively manage environmental controls such as dust mitigation and water management structures • Report environmental incidents and community complaints • Engage environmental staff in projects and decision making 	Review, suspend, stop work and/or modify processes to ensure commitment to environmental obligations
All Personnel	<ul style="list-style-type: none"> • Conduct operations in accordance with the EMS, site management plans and procedures and inductions. • Report all environmental incidents to supervisor or manager as required • Carry out work duties in an environmentally responsible manner 	Report environmental incidents, hazards or improvement opportunities Suspend or stop works or report to management for any potential environmental breach

5.4 Environmental Performance Goals (KPI’s)

Environmental goals or Key Performance Indicators (KPI’s) are developed for the business each year to ensure that environmental obligations and targets are set and align with the broader business plan and are reviewed and set with the GM and Executive Leadership team.

These KPI’s are set to ensure that the business focusses on environmental obligations and allows suitable resourcing for the management of environmental commitments at CSA.

Some of these KPI’s are linked to personal and business Short Term Incentive Plans (STIP’s) to ensure rewards for the commitment to these environmental outcomes.

6. PLANNING.

6.1 Actions to address risks and opportunities

6.1.1 General

The CSA Mine Risk Management Framework sets out the process used to identify environmental risks associated with the management and operation of the mine, this risk assessment also considers the requirements of or impacts on relevant stakeholders. The risk assessment process is also used to determine both the severity of and if any risks have potential compliance or legal impacts or outcomes.

The CSA Environmental Risk Register which is undertaken in accordance with the risk management is used as the basis to define the processes required to effectively manage the environmental risks and aspects associated with the CSA mine. Site policy and procedures are driven from the Environmental risk register and outcomes of the risk register review or update.

Environmental risks which have been identified as high, require a specific Management Plan or Work Procedure to be developed and maintained, as well as staff involved in this task need to be trained in the procedure.

These policies and procedures are design to ensure compliance with relevant approvals and legislation and form the basis for operational activities to be undertaken to prevent or minimise undesirable results.

The EMS and its subordinate processes are reviewed annually as part of the management review process to ensure that it can achieve its desired outcomes in managing the environmental aspects both onsite and offsite that are relevant to and associated with the operation of the CSA mine.

Environmental emergencies are addressed in the Environmental Risk Register and relevant TARPS (Trigger Action Response Plans) have been developed for the effective management of these. These potential emergencies are risk ranked in the Environmental Risk Register and are also reviewed annually for appropriateness.

6.1.2 Environmental Aspects

Environmental Aspects that have been identified for CSA through the Environmental Risk Register which takes into consideration any potential impacts on stakeholders and that are considered significant that CSA mine can control or have a direct influence on, are addressed in this EMS and included in the Environmental monitoring schedule (6.3.1)

The environmental aspects that are relevant to the CSA and which are part of the whole mine life cycle from exploration through the mining to rehabilitation have been considered for the site are:

- Air quality
- Water
 - Water Supply
 - Surface Water
 - Ground Water
- Waste Management
 - Underground Waste rock
 - Tailings facility
 - General/Industrial and Hazardous waste
 - Recycling
- Biodiversity and Land Management
 - Land access for exploration
 - Ecological resources
 - Soil resources
 - Rehabilitation
- Visual and stray light
- GHG. Energy management, use and reporting
- Noise and Vibration
- Community/stakeholders for both mining and exploration operations
- Approvals and Compliance
 - NSW RR
 - NSW EPA
 - Cobar Shire Council
 - Other regulators
- Operation of the Mill and processing of copper concentrate at the CSA Mine site
- Emergency Preparedness and Response
- Final closure and relinquishment

The Environmental Risk Register covers these environmental aspects and through this risk assessment process ranks the potential risks to the operation from these environmental aspects and to determine if these aspects are significant.

6.1.3 Compliance obligations

The CSA Mine compliance obligations are listed in the Compliance Obligations Register spreadsheet which is kept up to date annually in respect to Development Consent conditions, Mining Lease and Exploration Lease Conditions, EPL1864 conditions, explosives licence conditions, Water Licence conditions and requirements as identified throughout the Risk Register process. This Compliance Obligations Register is also used to allocate compliance obligations to the relevant responsible person (position) or site departments.

The site required monitoring, inspections and reporting schedules are all managed through the Monitoring Inspection Schedule (6.3.1) which is reviewed and updated annually for compliance and effectiveness, with the previous year's reporting and associated results/reports archived for document storage.

6.1.4 Planning action

Planning for the management of actions or environmental aspects associated with the EMS is completed, reviewed and updated annually to be presented as part of the Management Review and also the budgeting process. This is to ensure that the organisation at a higher level understands the required actions and allows sufficient resources to be allocated to achieve effective outcomes.

Actions that arise from the Risk Register are entered into INX and allocated to the specific area owner. The actions in INX can then be tracked to ensure they are implemented or undertaken as appropriate. A review of these actions and their

progress or outcomes in completed as part of the management review to ensure compliance with the EMS, these results also help in planning additional resources etc as required.

6.2 Environmental Objectives and planning to achieve them

6.2.1 Environmental objectives

The environmental objectives at CSA have been developed to ensure effective management of environmental issues at the CSA Mine. These objectives are the basis of the CSA Sustainable Environment and Community Policy and are derived from the Environmental Risk Register.

The environmental objectives for the CSA Mine are:

- All incidents reported as per EPL requirements
- Operations fully compliant with Development Consent and Mining Lease Conditions
- No unapproved development or disturbance undertaken
- Accurately collect and report ghg emissions for NPI and NGERS (graph against production for previous years and peers to set targets)
- Undertake Environmental management Gap Analysis and implement improvement plans
- Waste Management undertaken to minimise waste and ensure compliance (graph against previous years to set targets)
- Undertake and maintain full compliance with environmental monitoring based on best practice management
- Water Management – water use and water recycling targets

6.2.2 Planning actions to achieve environmental objectives

As part of the planning and implementation of the EMS environmental objectives the CSA mine annually undertakes a Balanced Business Plan (BBP) workshop with the leaders and supervisors of the business. The BBP sets the major objectives and targets and KPI's for the year as well as actions and timelines to achieve these objectives and desired outcomes.

For 2024 the commitments of the BBP for environment consisted of the following:

- No Environmental Non-Compliances
- Quantify GHG emissions from operations
- Improve site Environmental Metering
- Monitoring, Reporting, Auditing and Communication Improvement Project, and
- Implementation of an Environmental monitoring data analysis program

An annual review is to be completed of the environmental objectives to ensure compliance to the plan and determine if KPI's have been fully met.

6.3 Environmental Aspects

6.3.1 Monitoring

Site monitoring is conducted as per CSA-HSET-PRO-125 CSA Mine Environmental Monitoring Program and the Environmental Monitoring Schedule which is highlighted below as **Figure 5**. This schedule is set according to licence and regulatory conditions as well as best practice environmental management where specific conditions may not exist.

CSA Environmental Compliance Schedule 2024			Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sep		Oct		Nov		Dec																													
Frequency			W1	W2	W3	W4	W5	W6	W7	W8	W9	W10	W11	W12	W13	W14	W15	W16	W17	W18	W19	W20	W21	W22	W23	W24	W25	W26	W27	W28	W29	W30	W31	W32	W33	W34	W35	W36	W37	W38	W39	W40	W41	W42	W43	W44	W45	W46	W47	W48	W49	W50	W51	W52
Environmental Monitoring																																																						
Potable water	Micobiological	Fortnightly	[Green blocks]																																																			
	Chemical	6-monthly	[Green blocks]																																																			
Compliance	quality and levels	Quarterly	[Green blocks]																																																			
	quality and levels	2 Monthly	[Green blocks]																																																			
	dust	Monthly	[Green blocks]																																																			
	Piezos	Weekly	[Green blocks]																																																			
	quality and levels	Biannual	[Green blocks]																																																			
Rainfall monitoring		As required	[Green blocks]																																																			
Water usage	Water meter readings	Monthly	[Green blocks]																																																			
Water Balance		Monthly	[Green blocks]																																																			
Energy Usage	Invoices	Monthly	[Green blocks]																																																			
Rehabilitation	Rehab Photos	Quarterly	[Green blocks]																																																			
	Soil testing	Biannual	[Green blocks]																																																			
	LFA	As required	[Green blocks]																																																			
Contaminated sites	Contaminated sites register	Annual	[Green blocks]																																																			
Asbestos Air and Mat. Sampling		As required	[Green blocks]																																																			
Erosion	Erosion & Monitoring	Post 25mm rainfall	[Green blocks]																																																			
Waste Rock	Waste rock PAF analysis	As required	[Green blocks]																																																			
Inspections																																																						
Waste	Bin inspections	2-Monthly	[Blue blocks]																																																			
	Oil/waste bin inspections		[Blue blocks]																																																			
Housekeeping		Weekly	[Blue blocks]																																																			
Underground Inspection Report		Biannual	[Blue blocks]																																																			
Exploration Site Inspections		As required	[Blue blocks]																																																			
Boundaries		Monthly	[Blue blocks]																																																			
Weeds inspection		Annual	[Blue blocks]																																																			
Audits																																																						
Dangerous goods audit	Team	Annual	[Orange blocks]																																																			
Environmental systems audit		As required	[Orange blocks]																																																			
External environment audit		As required	[Orange blocks]																																																			
Reporting																																																						
Monitoring results summary		Quarterly	[Purple blocks]																																																			
Annual Report		Annual	[Purple blocks]																																																			
NPI		Annual	[Purple blocks]																																																			
NGER		Annual	[Purple blocks]																																																			
EPA Annual Return		Annual	[Purple blocks]																																																			
Forward Plan NSW RR		3 yearly	[Purple blocks]																																																			
Rehab Calculator		Annual	[Purple blocks]																																																			

Figure 5 CSA Environmental Compliance Schedule 2024

6.3.2 Air Quality

CSA Mine operates under the NSW Environment Protection Licence EPL1864. Although EPL1864 has no specific air quality monitoring requirements, it does state that (O3.1) *"the premises must be maintained in a condition which minimises or prevents the emission of dust from the premises"*. EPL1864 also requires the reporting of material harm to the environment, which includes the copper concentrate of tailings extending into area of CML5 that are classified as undisturbed.

To comply with industry best practice CSA have implemented dust monitoring using depositional dust gauges and have adopted the EPA guideline for amenity dust deposition of 4g/m²/month. The dust monitoring program consists of 16 monitoring points. Refer to the CSA Air Quality Management Plan for more information.

This EMS covers environmental dust only, health or worker dust exposure is managed under CSA-HSET-PLN-1066 as per the Safe Work Australia Exposure standards for industrial/ mining workplaces.

6.3.3 Water

CSA Mine operates in accordance with the conditions stipulated in Environmental Protection License (EPL) 1864, although no specific water monitoring requirements are listed in the EPL1864

EPL1864 states that no water pollution may occur, and licensed activities including the processing, handling, movement and storage of materials and substances used to carry out the activity; and the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity, must be carried out in a competent manner. Further, all plant and equipment installed at the premises or used in connection with the licensed activity must be maintained in a proper and efficient condition and operated in a proper and efficient manner.

In lieu of site-specific water management conditions, CMPL have adopted the following principles stipulated in the DIIS' *Water Stewardship* handbook:

- Prevent discharges of dirty water
- Reduce the importation of water from external water sources
- Minimise the occurrence of water losses through evaporation and seepage
- Maximise water use efficiency
- Maximise water recycling and reuse on site
- Separate water streams where practicable; and
- Minimise disturbance to existing drainage pathways

Water Supply

CSA sources water for the site through allocations on the Macquarie River via the Cobar Water Board. The Cobar Water Board manage water flow and distribution into Cobar from the Nyngan weir pool. CSA possess a current entitlement of 1356ML/yr of high security water under the water sharing plan for the Macquarie and Cudgong Regulated Rivers Water Source. There are calculated transmission losses on the allocation of approximately 30%.

The Cobar Water Board supplies approximately 3ML a day to the site.

The counteract transmission losses and low allocations due to drought conditions CSA have a supplementary water supply from a bore field onsite. CSA possess a 510ML ground water allocation from the Lachlan Fold Belt MDB Groundwater Source. Five groundwater bores, powered by solar with diesel backup are in use and are operated as required to supplement site water usage.

Surface Water

CSA is a nil discharge site which ensures all contaminated and potentially contaminated water remains onsite.

The following principles, which have been extracted from the Landcom *Managing Urban Stormwater* guidelines, underpin CSA's approach to water management onsite. These principles include the following

- Identify those activities that are potentially detrimental to environmental health
- Construct surface drains to control and manage run off
- Separate run off from clean and contaminated catchments where possible
- Minimise disturbance to existing drainage channels

The CSA water Management is comprised of 5 main catchments as described in Table 5 below,

Table 5 Catchment descriptions

Catchment Description	Classification	Area (ha)
North-western Rehabilitation Area – encompassing “Little Mt Brown” excised area and 4 sub-catchments	Contaminated	16.4
North-eastern area – encompassing the mine decline portal, paste fill plant, and Big Mt Brown area.	Contaminated	9.2
Main site area – encompassing site infrastructure	Contaminated	44.3
East area – encompassing the road to the TSF and natural areas	Contaminated	30.0
South-western area – encompassing the main road and the valley south of site	Clean	12.9

The STSF is managed as a sperate facility with its own catchment area and water management system under the STSF operational manual and does not make up part of the site surface water management area. The NTSF is excised for the lease and so water management is not the responsibility of CSA Mine.

The drainage network system at CSA is designed to ensure contaminated run off is capture, managed and no offsite discharge occurs of contaminated water.

Surface Water Monitoring

CSA retains several surface water dams and catchments, including naturally formed dams, in addition to manmade water storage structures. All water storage is tested for quality in order to assess for any environmental contamination which may occur through operations. The main metric which is assessed in testing is copper contamination. This is to ensure that environmental impacts are not spreading outside the set disturbance footprint for site. Copper and Zinc levels are assessed against the Australian and New Zealand Environment and Conservation Council (ANZECC) Guidelines for Irrigation and General Use. These stipulate a cap of 5mg/L of copper and zinc contamination in water.

Surface water monitoring is conducted quarterly and consists of analysis of pH, EC, TDS, turbidity, Sulfate, and total metals for Arsenic, Cadmium, Copper, Lead, Zinc Iron and Mercury. The site sample locations are as per **Figure 6** below. Refer to the CSA Water Management Plan for more detail.

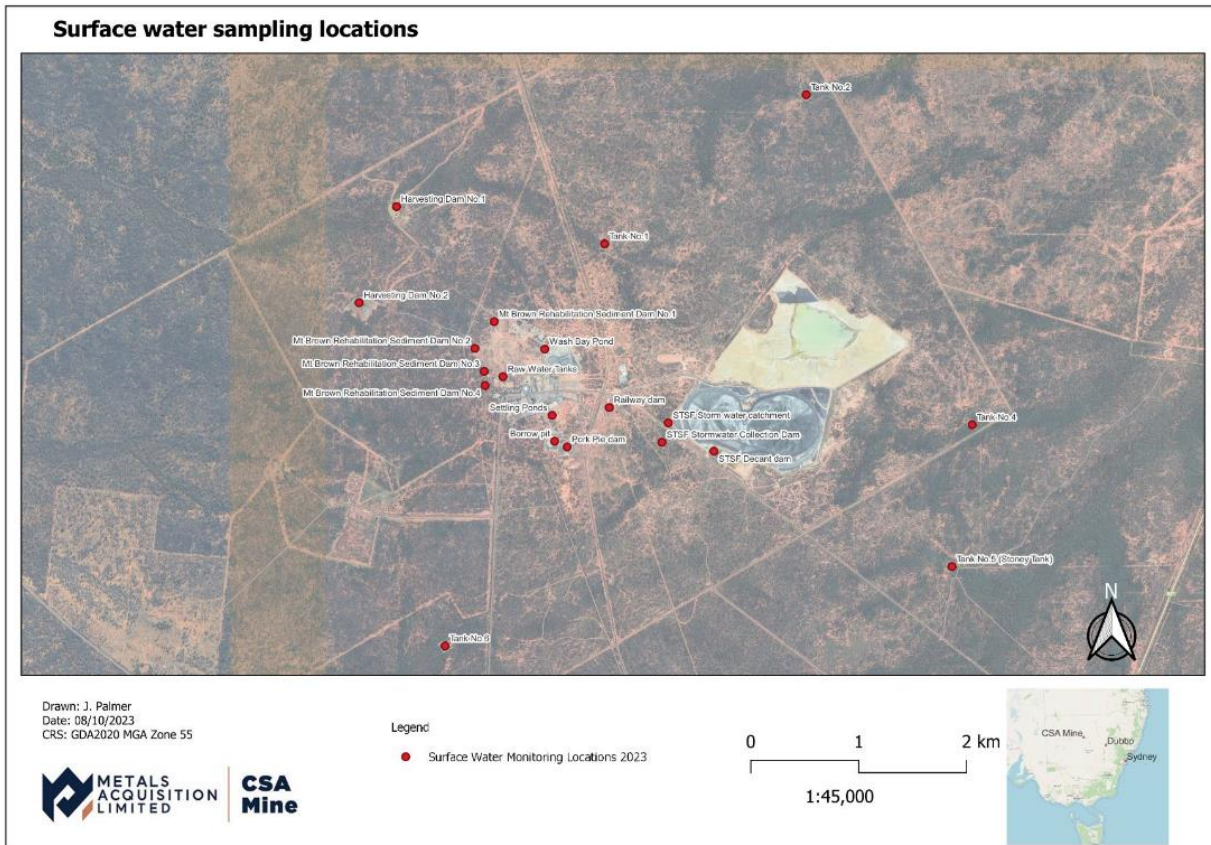


Figure 6 CSA Surface Water Monitoring Locations

Ground Water

The CSA Mine is located in the Cobar Basin, which is situated in Central West NSW and covers an area of 25,000km². Hydrologically, the Cobar Basin is interpreted as being a closed system due to being bound by Silurian granites on both sides and Ordovician metasediments that act as hydrological barriers.

The CSA mine is dry with no inflows of natural groundwater and ground water is rarely intersected by exploration drilling on the mining and exploration leases. Independent hydrological investigations have reported the occurrence of aquifers adjacent geological features from 12 m to 75m below the surface. The groundwater resource is described as being generally acidic to neutral and brackish to saline.

As the CSA Mine is located in a relatively closed hydrological circuit any potential seepage from the tailings or underground mine infrastructure would be confined to the local area.

Potential groundwater contamination points include

- Seepage from the Tailings Facilities (including the NTSF owned by the NSW State Government)
- Exploration Drilling
- Underground mining activities

Ground Water Monitoring

CSA has no requirements for groundwater monitoring. Groundwater levels are recorded for the tailings dam and CSA currently has 63 Vibrating Wire Piezometers (VWPs) in place on and adjacent to the South TSF. These are monitored on an ongoing basis by the tailings management team and external consultants, largely to assess for lateral or vertical leaching of tailings water into soil and groundwater. These are not ideally located to assess for groundwater levels or overarching groundwater monitoring, as the aquifer is non-homogenous, highly fractured, and has a fault running through it. In addition, VWPs were not installed for the express purpose of groundwater level monitoring. Automated groundwater monitoring bores are planned for construction in order to provide more accurate and useful environmental data regarding groundwater uptake and recharge times, however there is currently no baseline data as to the original groundwater levels and quality due to a lack of data in construction records regarding historic infrastructure.

6.3.4 Waste Management

Underground Waste Rock

The underground mining operations produce approximately 200,000-300,000t of waste annually. Wherever possible, waste is directly disposed of into underground voids left by stoping operations. On occasion, the volume of waste rock generated by development exceeds the volume of void produced by stoping operations and the void volume that becomes available as existing workings become redundant.

Waste rock produced from the Underground operations is either disposed of underground in voids or hoisted to the surface for stockpiling. The waste rock hoisted to surface has been deemed by the mine planners as NAF and is stockpiled in the Mt Brown area or adjacent to the STSF for future construction development work.

A Waste Rock Management Plan details the monitoring and management of waste rock on the surface.

Tailings

CSA mine produces approx 950,000 tonnes of tailings annually. The tailings is thickened and then split <<45/55% between the paste fill plant and deposition on the STSF.

The Tailings at the paste fill plant is mixed with cement powder and pumped underground for use in backfilling open stopes.

The CSA Mine deposits thickened tailings on the STSF as the licenced EPA discharge point. The Tailings Operation Management Plan details the management and monitoring requirements undertaken at the STSF to ensure the STSF is operated within compliance of design and licence conditions.

General/Industrial/ Hazardous Waste

General waste at the CSA Mine is separated into co-mingled recyclables and non-recyclable/putrescible waste. A waste and recycling collection services contract is in place for collection of both waste streams. The recyclable component is transported to a recycling facility whilst the non-recyclable waste is taken directly to the Cobar Shire Council Landfill. Industrial and hazardous wastes are removed from site under a services contract with a waste contractor.

All general, industrial and hazardous waste is removed from site in line with current legislation and disposed of at appropriately licensed facilities.

6.3.5 Biodiversity

The CSA Mine is located within the Cobar Peneplain which is a persistently dry semi-arid zone supporting sclerophyllous dominated vegetation and an understorey of drought resistant shrubs and ephemeral grasses and herbs that only germinate or flower in response to rain.

A Biodiversity Inventory Report (BIR) was completed in 2023 by EcoResolve. A summary of the BIR states Three Plant Community Types of various condition were identified on the site. 85 Flora species were identified, with no threatened flora species were observed. Four weed species were identified, none of these species are listed as Weeds of National Significance or Local Priority Weeds for the Cobar Region. 73 Fauna species were recorded onsite consisting of 45 bird species, 8 species of mammal, 12 reptile species, 8 species of bat and 8 amphibian species. Six threatened fauna species were recorded as well as 5 feral fauna species.

6.3.6 Soil

The CSA mine is within the Cobar Land System which is described as an undulating peneplain with low ridges, drainage lines and residual higher peaks, the soils within the Cobar Land System vary slightly within the system soils.

The soils within the CSA mine are typical of the lower slopes and ridges described in the Cobar Land System and consist of moderately deep red earths and calcareous red earths, usually with hard pan. Smaller drainage lines are also located on the site and consist of deep to moderately deep red earths with loam to clay loam surface texture over hard-pan with slight gravel.

The land capability at the CSA Mine is classified as a 6 - Low Capability Land under the NSW Land and Soil Capability assessment scheme.

Class 6 land is described as having severe limitations for a wide range of land uses. The land is generally only suitable for grazing with limitations and not suitable for cultivation and are susceptible to wind and water erosion.

Soil material characterisation undertaken in 2021 (SGM2022) describe the soil at CSA Mine as having soil fertility that is low with slight to moderate alkalinity. The low nutrient content may limit plant growth however, the cation exchange capacity (CEC) of most soils is suitable, in that is increases nutrient availability and buffering capacity of soil to acidification. Soil profiles are generally non sodic with an exchangeable sodium percentage (ESP) < 6% and having low dispersion potential.

SGM (2020) reports the topsoil stockpiles as being generally low in organic matter and nutrients having some moderate salinity and slightly alkaline.

6.3.7 Visual Stray Light

As the CSA mine is an underground mine with most of the operations occurring underground, lighting is restricted to a small operational area on the surface as well as vehicle movements and occasional projects work.

The CSA Mine is located in a remote rural area and as such, visual light does not impact on neighbours or the township of Cobar.

There have been no complaints received from the effects of visual light and no monitoring has been undertaken and currently no monitoring is planned.

6.3.8 Emissions data collection

Emissions data is collected through both the NPI and NGERs reporting requirements.

The NPI reporting requirements requires to report information on emissions, releases and transfer of various pollutants into the air, water and onto land.

The NGERs reporting requirements focuses on reporting greenhouse gas emissions, energy production and energy consumption. NGERs reports on both scope 1 and scope 2 emissions.

6.3.9 Noise and Vibration

The CSA mine site is located 11km from the township of Cobar and over 3km from the nearest neighbour. Blasting and crushing are the two noisiest operations at CSA, and both of these occur underground. The grinding circuit as part of the mill operations is the noisiest operation on the surface.

No noise or vibration monitoring is required or undertaken at the CSA site

7. SUPPORT

7.1 Resources

Environmental staff resources are shown in the CSA Org chart and includes an offsite MAC Corporate Environment Manager and onsite resources of Environmental Superintendent who is the most senior resource on site full time along with an Environmental Officer and an Environmental Graduate position.

The CSA Environmental Superintendent is the position along with the GM who holds responsibility for the environmental management of the site including emergency response to environmental incidents and reporting of incidents to the regulatory authorities.

CSA mine sets an annual budget for environmental management works, out of budget works can be funded if appropriate through an application process and CSA Mine also outsources specialist environmental works to consultants and contractors as required.

7.2 Competence

It is a condition of employment at CSA that a professional in the Environmental team must have completed or be in the final stages or process of completing an environmental degree from a reputable university.

The roles and responsibilities of the various environmental roles on site are determined by the Job Description. Much of the competence of the Environmental staff at CSA comes from learning on the job as well as undertaking industry and site relevant training.

As part of the Annual Management Review a training needs analysis is undertaken to ensure the competency of site staff is maintained in line with planned works and KPI's.

CSA maintains a training register of all courses undertaken by CSA staff, specific environmental course includes, tailings and water management, chemical and dangerous goods management and reptile handling.

The contracts management and induction system ensure that contractors and people coming to site are appropriately licenced, trained, and competent to come onto site to perform their designated tasks.

CSA training department maintain a training matrix that details the minimum requirements and training required for essential positions onsite.

7.3 Awareness

Awareness of issues pertaining to the EMS are made aware of with the CSA Mine site personnel or relevant people via a number of processes including:

- the MAC CSA Environmental Policy
- Environmental Risk Register
- Site inductions
- HSE toolbox meetings
- GCOM
- Incident review meetings
- Environmental Site Inspections
- Contract tender and ongoing contract meetings

Compliance obligations and personal accountability including personal fines for severe environmental non-compliance is highlighted in the surface induction to ensure that all people accessing the site understand their own responsibility to ensure compliance with the site EMS requirements. Records are kept of inducted persons and a record of when site competencies expire and must be re completed.

7.4 Communication

7.4.1 General

CSA communicates internally with employees on environmental matters to ensure they are informed and aware of environmental obligations and environmental achievements.

7.4.2 Internal communication

Internal communications are required to keep the workforce informed of what is happening regarding Environmental Management on the site and also to provide an avenue for feedback to be received. **Table 6** below details the various methods of internal communications that are used as a mode to inform site personnel of site requirements (including EMS requirements) that maybe static or may change on a regular basis as the mine responds to operational and planning requirements/issues.

Table 6 Internal communications methods

Form	Frequency
Email	Daily, adhoc as required All Site wide email only from the GM
Daily Managers Meeting	Daily on weekdays
Inductions	Undertaken onsite weekly, reinduction every 4 years
Training	As needed per training matrix
Toolbox Talks	Start of most shifts
GCOM meetings	Site wide 1 day per week
Notice Boards	As needed to be updated
Staff Briefings	As needed by the business
Monthly Reports	Monthly

7.4.3 External communication

CSA communicates externally to the public, shareholders, stakeholders including government regulators, and other relevant parties such as business groups. External communications can be done via the GM or Investor Relations for instances of environmental incidents our outcomes.

Other external communications are undertaken via the Environmental team which includes the NPI, NGRS and EPA reporting, it also includes correspondence and reporting to the NSW Resources Regulator and other regulatory bodies.

Table 7 External communication methods

Form	Target Audience	Frequency
Email, in person or phone, advertisements or public notifications (Cobar Weekly)	Neighbours – landholders Cover Shire Council Community groups	As required for information and updates
Official Notification and follow up reports	NSW EPA or NSW Resources Regulator	Following incident or investigation or official notification
Quarterly Reports	Shareholders	Quarterly
Annual Report and Forward Program	NSW Resources Regulator	Annually
NPI and NGRS reporting	NSW Government, Interested public	Annually
EPL annual Return	NSW EPA	Annually
MAC Website	Shareholders Community Interested Parties	As required

7.5 Documented information

7.5.1 General

CSA Mine has a document control procedure CSA-HSET-PRO-1042 Site Document Control Procedure and document templates which stipulates how documents are created and saved.

7.5.2 Creating and updating

New documents are created using the appropriate templates and once created are then put into the document control system – where they are allocated a document number and formatted appropriately with the correct naming and numbering convention as well as review dates etc.

7.5.3 Control of documented information

Refer to Document Control Procedure CSA-HSET-PRO-1042 Site Document Control Procedure.

Controlled documents once approved are uploaded onto the intranet and if a revised document the previous version is removed and archived.

As part of the records management system or version control with revised documents the version number and a summary of changes must be included along with the date and who made the changes.

8. OPERATION

8.1 Operational Planning and Control

The CSA mine has been in operation for a long time and is a mature site and operation. Process controls are in place for all sections of the operation such as operating the Mill or managing the Tailings dam. These operational controls at CSA are managed through relevant Procedures, Practices, Tarps, and environmental controls that are fit for purpose to manage the specific task or process through both normal and abnormal operations.

The Change Management procedure and change management form includes a section to ensure that process changes take into consideration the environmental impacts and are recorded. Relevant management plans or procedures can then be updated accordingly to incorporate the process changes.

As part of the change management process the Environmental Risk Register will need to be updated to account for the risks pertaining to the proposed or implemented process changes.

CSA-HSET-MP-1004 Contractor Management Plan and the contractor pre-qualification selection processes are in place to manage external providers, including undertaking a risk assessment of the services or product to be supplied to ensure the perceived risks are identified and the contractor/service provider understand their obligations and comply with and operate with consistency to the CSA EMS and legal compliance requirements.

The Significant environmental impacts associated with the transportation or delivery, use, end of life treatment and final disposal of the products produced are addressed in the Environmental Risk register and communicated to the site through the General Surface Induction.

8.2 Emergency Preparedness and Response

CSA Mine has an Emergency Response Plan (PLN-059-CSA Mine Crisis Management Plan) which includes environmental incidents and or emergencies. It is the responsibility of the site ESO's and Mines Rescue team to attend to the immediate emergency which is managed under the Emergency Plan and if the emergency is of a large scale it is escalated to be managed by the Incident Management Team.

CSA regularly run mock incident scenarios to test and further develop the site emergency response ability and emergency protocols, these mock scenarios and any live scenarios are documented and reviewed as part of the managements system to add any learnings or changes into the required documentation. The CSA Mines Rescue team undertake regular structured training and compete in Mines Rescue competitions to enhance their skills and learn from others.

CSA has in place a Mutual Aid Agreement with other mines, Cobar Shire Council and Emergency Services to provide emergency support or assistance as required.

Cobar NSW Fire Brigade -agreement for volunteers who work at CSA to take short notice leave for emergency response.

Environmental incidents have the potential to be reportable to both the NSW EPA and the NSW Resources Regulator. There are strict guidelines in place for initial notifications of the incident and follow up reporting. The NSW EPA may issue clean up notices if required pending severity of the environmental incident. Management of these incidents is carried out as per the site Pollution Incident Response Management Plan (CSA-HSET-MP-1053- Pollution Incident Response Management Plan), and various Trigger Action Response Plans, depending on the location and type of incident.

9. PERFORMANCE EVALUATION

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

The environmental monitoring program which has been developed from compliance requirements, previous incident investigations, to collate background data and also comply with industry best practice is implemented as per the monitoring schedule described in section 6.3.1 and as per CSA-HSET-PRO-125 CSA Mine Environmental Monitoring Program and the Environmental Monitoring Schedule.

Environmental Inspections are scheduled for the site on a rotating basis and include splitting the site into operational areas. The inspections in these operational areas are undertaken in conjunction with the delegated area owner or their delegate. These inspections are recorded in INX and actions are assigned accordingly to the responsible persons.

The environmental monitoring is collated and reported in two half yearly monitoring reports, which form the basis for the development of the annual MAC Sustainability Report. The NSW EPA require that any monitoring data that is a requirement of the sites EPL be made publicly available. The CSA EPL1864 does not have any specific monitoring requirements and as such there are no requirements for the environmental monitoring data at CSA to be published on the company website. MAC to maintain with its value and show transparency voluntarily submit the environmental monitoring data to the MAC website. The H1 and H2 monitoring reports are provided for the public on the MAC website. Monitoring records and documents are kept as per the requirements in the EPL1864.

Rehabilitation Management Plan reporting is via the Annual Report to the NSW Resources Regulator and includes only rehabilitation relevant monitoring and results and reports against the commitments made in the Forward Program. The Annual Report and Forward program are publicly available on the MAC website.

9.1.2 Evaluation of compliance

The evaluation of compliance is conducted as per section 9.2.2 through the internal auditing process. CSA maintains an Environmental Obligation Register that is internally audited and is updated based on process or approvals changes at the CSA Mine site.

The document CSA-HSET-PRO-1122 Assurance Process Procedure documents the processes for audits of legal compliance evaluation. These audits are undertaken as per 9.2.2 with any non-compliance or actions managed and tracked in BSafe to ensure they are captured and completed as required.

9.2 Internal Audit Program

9.2.1 General

Internal audits are conducted as per the procedure in CSA-HSET-PRO-1122 Assurance Process Procedure and as per section 9.2.2. the outcomes of the audits are tracked to ensure that actions are completed and any relevant documentation such as Management Plans or procedures are reviewed and updated as required with the new requirements.

9.2.2 Internal audit program

Although there are no licence conditions in the EPL1864 or any of the Cobar Shire Council Development consents that require an audit to be undertaken, CSA has deemed that it is appropriate to undertake an internal compliance audit every second year to ensure the site maintains compliance with the Environmental obligations register.

Other site audits include:

- Tailings Management Compliance against the GISTM standard to ensure that the tailings facilities are being managed in accordance with industry best practice and relevant standards.
- ISO14001 self-audit
- Exploration code of practice self-audit assessment
- EY financial provisioning auditing is conducted against the values included in the rehabilitation provisioning and the NSW RR RCE calculations.
- Dangerous goods and hazardous substances audit
- Underground area audit
- 3 yearly chemical storage audit
- 3 yearly closure cost audit
- 3 yearly audit by occupational hygienist

These internal audits are scheduled as part of the Environmental Monitoring schedule and are conducted accordingly by the Environmental team and relevant subject matter experts as required.

The members of the Environment team who conduct the internal audits have been trained and are competent in undertaking internal audits.

Audit outcomes are to be included in the Management Review as an agenda item to inform company management of the non-compliances, opportunities for improvement and to assist in the future planning for resource allocation.

9.3 Management Review

The Management Review of the CSA Mine EMS occurs annually and involves the site GM, Environmental Manager or Superintendent, PHST Manager as well as other senior managers as required.

The meeting for the management review occurs to ensure the EMS is current and its objectives meet the business needs going forward and that it serves its purpose to meet environmental obligations.

An example of the management review meeting agenda would include the following

- Previous meeting minutes
- Update on external issues, approvals, community
- Any changes/additions to significant environmental aspects, risks or opportunities
- Report on achieving environmental objections, training and programs
- Report/review on CSA Mines
 - Internal audit results
 - Nonconformities and action plan
 - Monitoring and measuring results
 - Compliance and approvals
- Adequacy of Resources and Training Needs Analysis
- Any communications
- Any opportunities for improvement
- Setting new Environmental KPI's for following year

10. IMPROVEMENT

10.1 General

Internal EMS audits are carried out on a scheduled timing to ensure that the EMS is properly implemented and is up to date with activities and operations that are being undertaken on the CSA Minesite and it conforms to the requirements of the standard.

Each element of the EMS is audited on a regular basis. Some activities may be audited more frequently as required if there are major changes to processes or operations or if there has been a serious risk identified or incident occurrence.

Audit reports are written up with findings and recommendations made for corrective or preventative actions which are recorded as actions in the INX incident management system.

These audit findings and any actions are reported at the Annual EMS Management Review meeting for consideration.

10.2 Non-conformity and corrective action

All environmental incidents and complaints are recorded in INX software /BSAFE. Depending on the severity and risk associated with the environmental incident will determine if it is an internally or externally reported incident. The incident investigation will determine causal factors and corrective actions required.



10.3 Continuous Improvement

The CSA Mine environmental team through the monitoring program, internal audits, site inspections, risk register reviews, monthly and annual reporting identify trends and use this knowledge to continually improve the environmental management process for the site. This may include updating the EMS or site procedures to reflect or implement the improved process or activity.

11. RECORDS MANAGEMENT

To ensure documents are current and suitable CSA Mine has a document records system that is managed to ensure timely review and update of documents on a two-yearly basis. This regular review of documents can also be completed on an as needs basis following a significant change in procedure or from the outcome of an incident investigation.

12. APPENDIX 1 – ENVIRONMENT POLICY

Title: Sustainable Environment and Community Policy

Purpose: This policy underscores Metal Acquisition Limited's unwavering commitment to environmental stewardship and positive community engagement. It is designed to promote sustainable practices that go beyond compliance and contribute to a better future for all stakeholders.

Scope: This policy applies to all Metal Acquisition Limited's operations, projects, and personnel. It extends to our contractors, suppliers, and partners who are expected to uphold similar environmental and community standards.


Key Directives:

1. **Environmental Preservation:** Implement practices that minimise our environmental footprint. Commit to continuous improvement in environmental performance, setting, and reviewing objectives and targets. Ensure efficient use of resources, including energy and water, and explore renewable alternatives.
2. **Community Engagement and Development:** Establish strong relationships with local communities based on mutual respect, active partnership, and long-term commitment. Support community-oriented initiatives and investments in health, education, and socio-economic development. Aim to integrate into the communities where we operate, fostering an environment where we live and work harmoniously with local populations and contribute positively to their well-being.
3. **Biodiversity and Land Management:** Proactively manage operations to protect biodiversity, rehabilitate disturbed land, and promote responsible land-use planning. Collaborate with experts and local authorities for land restoration and conservation projects.
4. **Climate Change Mitigation and Adaptation:** Actively assess and respond to the risks and opportunities presented by climate change. Reduce greenhouse gas emissions through improved operational efficiencies and the use of advanced technologies.
5. **Waste and Pollution Reduction:** Strive for zero waste through reduction, recycling, and reuse strategies. • Monitor and manage waste and emissions, ensuring compliance with, or exceeding, relevant legal requirements.
6. **Stakeholder Collaboration:** Engage transparently with stakeholders, including local communities, governments, and environmental groups, to inform our practices and contribute to sustainable development goals.
7. **Emergency Preparedness and Response:** Develop, maintain, and test emergency response procedures aimed at protecting the environment, our employees, and community members.
8. **Training and Awareness:** Provide training and resources to employees and contractors to foster a culture of environmental responsibility and encourage innovative approaches to sustainability.

Compliance and Reporting: Mandatory compliance with this policy is essential for all operations and personnel. Employees and contractors must report any environmental or community-related incidents, and non-compliance may result in disciplinary action. Continuous feedback and improvement suggestions are encouraged.

Review and Amendment of Policy: This policy will be regularly reviewed to ensure it remains relevant, effective, and in alignment with the latest scientific knowledge and societal expectations. Any amendments will be communicated promptly.

Commitment: Metal's Acquisition Limited is dedicated to upholding this policy, allocating necessary resources, and supporting a collaborative approach to sustainable environmental practices and community growth. We believe in creating value that benefits our planet and society.



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