

Black Mountain Mining

BMM-HSE-ENV-SOP-0041 Environmental Incident and non-conformance

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❖ **Change History**

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❖ Definitions and Abbreviations

Word / Phrase / Abbreviation	Definition
PEME	PEME is an acronym used in Black Mountain Mining and has the following meaning: - People, - Equipment, - Materials, - Environment, The use of this in written documentation helps to comply with Resources Clause 7 – ISO 9001, ISO 14001 and ISO 45001. It is advisable to include in all written documentation.
Environmental Incident:	An event or chain of events which caused or could have caused injury illness, loss of assets, or potential or actual damage to relationships or reputation.
Corrective action:	Action to eliminate the cause of a nonconformity and to prevent recurrence
Mitigation:	The action of reducing the severity or seriousness of an incident.
Non-conformance:	A breach or deviation from defined criteria in relation to established programmes, policies and standards, procedures, regulations, etc. that has the potential to cause harm.
Categories of Environmental Incidents:	Categories of environmental incidents are outlined in BMM-HSE-ENV-SPEC-0053 (Environmental incident classification).

1. POLICY STATEMENT

Black Mountain's Standard Procedures (SOP's) shall be written in a clear concise manner, communicated to all employees and applied accordingly.

2. OBJECTIVES

Procedure SOP-0041: Environmental Incidents & Non-Conformance ensures that all environmental incidents and non-conformances are accurately reported and documented as and facilitates the speedy remediation of these incidents. The procedure further aims to ensure that measures are put in place to prevent similar incidents occurring in the future

3. SCOPE

The SOP-0041: Environmental Incidents & Non-Conformance procedure applies to all incidents recorded in areas and operations that fall within the scope of the Black Mountain Mining (Pty) Ltd EMS.

4. PROCEDURE

Investigating and reporting incidents and non-conformances contributes to the identification of the basic causes, corrective actions, mitigation actions and preventative controls. An effective reporting and investigation system will achieve the following:

- assurance that all incidents are reported
- discovery of underlying or basic causes of incidents
- reduction of recurrences of similar incidents
- identification of control requirements
- provision of information in case of litigation and information on the costs of incidents expression of concern of management

4.1 Reporting Of Environmental Incidents / Non-Conformances

- Any person observing an environmental incident or non-conformance should report this immediately to their supervisor or directly to the environmental section.
- Immediate corrective actions that are possible should be taken (In proportion with the size of the incident). This will assist in minimizing the impact on the environment.
- Environmental incidents need to be reported to the Environmental section that will log the incident/NC in the Incident register.
- An HSE Incident form must be filled in by either the person reporting the incident or their supervisor. These can be obtained from the following places:
 - Sharepoint Document management System

- Gamsberg report to Environmental representative of Business partner
- Logged directly in Electronic EMS system
- The Environmental Unit will follow up on all reported incidents / non-conformances to verify the details as submitted on the incident report.
- All incident reports received by the Environmental Unit will be allocated a reference number when logged into system.
- Communication to other areas/sections where similar incidents can occur will be done.
- The classification according to Vedanta standard described in BMM-HSE-ENV-SPEC-0053.
- The environmental officer will then advise the required responsible employee on with further actions regarding the incident
- Incident information received from other Vedanta sites on Category 4 and 5 incidents shall be communicated through the toolbox talks and internal communication channels, to promote awareness.
- All electronic copies environmental incident reports will be saved in the environmental incident and non-conformance folder.

4.2 Category 1 And 2 Incident Investigation and Close-Out

- The environmental incident is reported and sent the Environmental Unit.
- The environmental unit will allocate the incident/non-conformance category when the incident is logged with team review of incident size and impact as stipulated in Vedanta MS-11
- An email is then sent to the manager responsible for the area where the incident occurred.
- Preliminary incident investigation will be conducted to determine cause of incident
- The Environmental Unit facilitates the completion of the incident report on the root cause and actions taken, detailing the cause of the incident. These corrective and preventative measures will be taken to remediate the incident.
- Proposed corrective and preventive actions shall be reviewed and approved by senior management of the relevant section.
- Once the corrective and preventive actions have been taken by the relevant responsible person in the section, the incident report is updated and the environmental unit notified
- The site is inspected by the Environmental Unit personnel and the incident is signed off if remedial action has been satisfactory.

4.3 Category 3, 4 And 5 Incident Investigation And Close-Out

- Category 3, 4 and 5 incidents will be fully investigated by the Environmental section and representatives from the section responsible for the incident. Area, line and site management shall participate during the investigation process.
- Create a Flash report within 24h of incident.
- A full description of the incident is to be documented by the Environmental Unit personnel /HSE Stand-by representative. Information to be documented includes:
 - o What was the person / witness doing at the time of the incident
 - o A description of how the incident occurred.
 - o Any immediate corrective actions taken
 - o The extent of the damage caused
 - o The direct cause of the incident
 - o Any recommended actions.
- The outcomes of the incident investigation are to be fully documented by the Environmental Unit personnel.
- The incident is closed out by the normal route described above (section 5.2).

4.4 Incident Expiry

- Each reported incident is allocated an "expiry date". This date stipulates the length of time the responsible section has to remediate an incident.
- Once corrective and preventative actions have been completed, the Environmental section will conduct an inspection to ensure that the actions taken are satisfactory.
- The incident will be signed off in the manner described above (Section 5.2).

4.5 Environmental Emergency Incident

- Should a Category 5 incident occur, the Environmental section / HSE stand-by representative must be notified immediately, and the incident must be treated as an emergency according to the companies Emergency Preparedness and Response procedure. (BMC-HSE-ENV-SOP-0033)

4.6 Monitoring And Measuring Of Environmental Performance

- Monthly statistics are drawn up detailing the environmental incidents that have occurred over the past month as well as the year-to-date trends.
- The information presented details the type of incidents reported as well as the types of incidents occurring in each section.
- This information is presented by the Environmental section in KPI meetings.

4.7 Complaint Register

- A complaint register is maintained by the Environmental section at the Environmental section Offices and at Gamsberg project offices.
- Complaints can be reported by the community and be logged into the complaints register.
- If a mine section is responsible for the complaint, then this will be logged in as a complaint on the incident register to follow the investigation method.

5. REVISION HISTORY

Revision 11: BMM-HSE-ENV-SOP-0041 Incident and Non-conformance dated August 2024

- Included Vedanta standard MS-11
- Incident severity determination by team

Revision 10: SSD-ENV-SOP-041 Incident and Non-conformance dated August 2022

- Included requirement for a preliminary Investigation of Cat 1 and 2 incidents
- Updated link to online incident reporting form
- Induce reference to reporting incident directly in electronic EMS

Revision 9: SSD-ENV-SOP-041 Incident and Non-conformance dated February 2021

- Amended Scope of document to Black Mountain Mining (Pty) Ltd
- Amended Section 5.1 to include reference to electronic HSE
- Procedure referral is changed from STD to SOP.

Revision 8: SSD-ENV-STD-041 Incident and Non-conformance dated 15 July 2019

- Change approval/owner from SHE manager to HSE manager.
- Change SHE Standby representative to HSE.
- Added Emergency Procedure number at section 5.5
- Update approval and sanction section.

6. RESPONSIBILITIES

- The designated Custodian shall implement and maintain this document
- Department Heads shall ensure that this SOP is applied with due diligence.
- Deviations from this SOP shall be effected via approved "Deviations from Standard" documentation.
- Should additional precautions, due to special circumstances unique to that Department/Section; over-and-above the requirements of the Procedure be necessary; then the Department Head shall ensure that, in consultation with the

relevant specialists, such requirements are specified in writing, conveyed over to the end users and recorded as such.

7. ASSOCIATED DOCUMENTS

BMM-HSE-ENV-SPEC-0053: Classification of Environmental Incidents

BMM-HSE-ENV-FRM-0037: Emergency and Incident Call-out Record

BMM-HSE-ENV-FRM-0018: Incident form

8. VALIDITY AND DOCUMENT MANAGEMENT

8.1 Document Validity

This SOP is effective from 2007/06/17 and was last reviewed on 13-01-2025. This SOP will be reviewed every 2 Years.

8.2 Document Management

8.2.1 This SOP replaces any other SOP issued earlier by BMM to the extent specifically covered here. This SOP should be followed in letter and spirit.

8.2.2 BMM is committed to continuously reviewing and updating policies and procedures, based on the Entity's risk assessment and shall incorporate for any regulatory requirement which is required to do so.

8.2.3 Any amendment to this SOP or issue of any guidance or circular etc. under this procedure must be approved in writing by the approving authority as listed in this document.

8.2.4 BMM reserves the right to withdraw, modify or revise the SOP as a whole / partial without providing any justification for the same. On revision, it should be duly communicated to the personnel involved.

8.2.5 If compliance with this SOP ever conflicts with the applicable law, regulation, directives issued by the statutory and or regulatory authority, then compliance must be ensured with the law.

8.2.6 In order to ensure compliance or to address any known conflicts with the law or to address any specific local requirements, BMM may adopt local sub-procedures which shall be by way of addendum to this SOP and which shall be approved by the approver of this SOP. Proposing of such addendum shall be the responsibility of the respective Entity's competent authority who is at an equivalent level with the SOP owner as set out in this document.

8.3 Violation of Sop

8.3.1 BMM follow a "Zero Tolerance Policy" with respect to non-compliance with this SOP and/or any other SOP / guidance issued by BMM and its constituent Entities.

8.3.2 Violation of this SOP is subject to appropriate disciplinary actions which may include but not limited to termination of employment. This determination will

be based on the facts and circumstances of each situation. Any accused of violation of this SOP will be given an opportunity to present their case prior to any determination of appropriate disciplinary actions. Violation of this SOP may also be subject to substantial civil damages, criminal fines and prison terms.

- 8.3.3 Each employee is responsible for ensuring that their conduct and the conduct of anyone reporting to them shall fully comply with this SOP. Compliances, both personal and by subordinates, will be a factor in periodic performance appraisals.

8.4 Disclaimer

- 8.4.1 This SOP issued by BMM is for internal compliance and does not create, nor shall it be construed to create, directly or implicitly, any rights, duties or obligations of BMM to any person, body or legal Entity.
- 8.4.2 This document and its contents are the copyright property of BMM. The release of this document to any third party outside BMM is strictly prohibited without prior consent.

9. REVIEW AND APPROVAL

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This document was approved (in sequence) by the individuals above using electronic approval in our Document Control System.

Final approval status: **Approved**

Approvals were done electronically.

❖ **Annexures / Appendix**