

## Black Mountain Mining

### BMM-HSE-ENV-SPEC-0053 Classification of Environmental incidents New

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## ❖ Change History

| Modified Date | Version | Modified by | Description of change                                                                  |
|---------------|---------|-------------|----------------------------------------------------------------------------------------|
| 09/03/2015    | 1       | A Cloete    | Update of numbering format in line with BMM document control                           |
| 21/08/2019    | 2       | A Cloete    | Update with BMC logo                                                                   |
| 30/08/2023    | 3       | F Haefele   | New DMS Template, Format changes                                                       |
| 05/09/2023    | 4       | A Cloete    | Update Incident Classifications to latest Vedanta Classification (VED/CORP/SUST/MS 11) |

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## ❖ Definitions and Abbreviations

| Word / Phrase / Abbreviation | Definition                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PEME                         | <p>PEME is an acronym used in Black Mountain Mining and has the following meaning:</p> <ul style="list-style-type: none"><li>- People,</li><li>- Equipment,</li><li>- Materials,</li><li>- Environment,</li></ul> <p>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.</p> |
| BMC                          | Black Mountain Complex, including Deeps, Swartberg and Gamsberg                                                                                                                                                                                                                                                                                                                                         |
| WWTW                         | Waste Water Treatment Works                                                                                                                                                                                                                                                                                                                                                                             |
| NGO                          | Non-Government Organisation                                                                                                                                                                                                                                                                                                                                                                             |
| NEMA                         | National Environmental Management Act                                                                                                                                                                                                                                                                                                                                                                   |

## 1. POLICY STATEMENT

Black Mountain's Specification Sheets (SPEC's) shall be written in a clear concise manner, communicated to all employees, and applied accordingly.

## 2. CLASSIFICATION

| Categories                      | Definition | Criteria                                                                                                                                                                                                                              |
|---------------------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Category-1<br>30 days close out | Negligible | Incident that has localized short term impact on environment within the premises                                                                                                                                                      |
|                                 |            | Likely to have concern for internal stakeholders but not for external stakeholders                                                                                                                                                    |
|                                 |            | Require minor intervention for remediation                                                                                                                                                                                            |
|                                 |            | Non-conformance -<br>1) Single example of a non-compliance with BMC environmental procedures & standards.<br>2) Could give rise to a spill with limited environmental contamination requiring very minor or no remediation.           |
|                                 |            | Complaints -<br>Local complaints in company office (written or verbal) from external sources.                                                                                                                                         |
|                                 |            | Timing -<br>Notification time - Reporting on the same day in the system.                                                                                                                                                              |
|                                 |            | Investigation Time Period - Corrective actions shall be initiated.                                                                                                                                                                    |
| Examples                        |            | Oil spillages with in working area                                                                                                                                                                                                    |
|                                 |            | Localized dust/fume leakage of hazardous substance                                                                                                                                                                                    |
|                                 |            | Solid waste/ garbage at undesignated place causing impact on the environment                                                                                                                                                          |
|                                 |            | Used oil drums without secondary containment                                                                                                                                                                                          |
|                                 |            | Unintended minor release of natural resource within section of plant                                                                                                                                                                  |
|                                 |            | Water leakage persisting beyond a week                                                                                                                                                                                                |
| Categories                      | Definition | Criteria                                                                                                                                                                                                                              |
| Category-2<br>60 days close out | Minor      | Incident that has localized short term impact on environment within the premises                                                                                                                                                      |
|                                 |            | Likely to be of concern to internal stakeholders but not external stakeholders                                                                                                                                                        |
|                                 |            | Remediation is required and likely to take less than 1 months (physical work not commercial process or mobilisation)                                                                                                                  |
|                                 |            | Non-conformance -<br>1) No more than two examples of a similar type of non-compliance with environmental procedures & standards.<br>2) Could give rise to a spill with minor environmental contamination requiring minor remediation. |
|                                 |            | Complaints -<br>Receiving of multiple complaints on same topics from external sources                                                                                                                                                 |
|                                 |            | Timing -<br>Notification Time-Reporting on the same day in the system.                                                                                                                                                                |
|                                 |            | Investigation Time Period - Corrective actions shall be initiated.                                                                                                                                                                    |

|                                  |                                                                                                           |                                                                                                                                                                                                                                                  |
|----------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Examples                         | Oil/chemical spillages leading to drain/ wastewater storage pond                                          |                                                                                                                                                                                                                                                  |
|                                  | Leakages/ spillages of untreated wastewater in the working area                                           |                                                                                                                                                                                                                                                  |
|                                  | Fugitive dust generation from tailing dam/ ash dyke/ waste dump (not affecting community)                 |                                                                                                                                                                                                                                                  |
| <b>Categories</b>                | <b>Definition</b>                                                                                         | <b>Criteria</b>                                                                                                                                                                                                                                  |
| Category-3<br>90 days close out  | Moderate                                                                                                  | Incident likely to cause short term impact on environment (inside/outside premises)                                                                                                                                                              |
|                                  |                                                                                                           | Likely to be of concern to internal stakeholders/ external stakeholders or attract local media coverage                                                                                                                                          |
|                                  |                                                                                                           | Remediation is required and likely to take less than more than 1 months and less than 3 months                                                                                                                                                   |
|                                  |                                                                                                           | Reportable to Authorities according to NEMA and WUL                                                                                                                                                                                              |
|                                  |                                                                                                           | Non-conformance -<br>1) More two examples of a similar type of non-compliance with BMM environmental procedures & standards but less than six.<br>2) Could give rise to a spill with moderate environmental contamination requiring remediation. |
|                                  |                                                                                                           | Complaints -<br>Receiving of multiple complaints on same topics from/ to Local NGO/ Govt. body                                                                                                                                                   |
|                                  |                                                                                                           | <b>Timing -</b><br>Notification Time-Reporting on the same day in the system.<br>Investigation Time Period - Investigation within 5 days                                                                                                         |
| Examples                         | Waste containing water contaminating the water resource                                                   |                                                                                                                                                                                                                                                  |
|                                  | Spillage of more than 210l oil                                                                            |                                                                                                                                                                                                                                                  |
|                                  | Overflow of the WWTW                                                                                      |                                                                                                                                                                                                                                                  |
|                                  | Waste containing water spillage into a dry riverbed                                                       |                                                                                                                                                                                                                                                  |
| <b>Categories</b>                | <b>Definition</b>                                                                                         | <b>Criteria</b>                                                                                                                                                                                                                                  |
| Category-4<br>120 days close out | Serious                                                                                                   | Incident very likely to cause short-term and/or long-term impacts on environment                                                                                                                                                                 |
|                                  |                                                                                                           | Likely to be of major concern to external stakeholders or attract state level media coverage                                                                                                                                                     |
|                                  |                                                                                                           | Regulators likely to initiate show cause which may lead to fines or other sanctions due to Env incident resulting in receipt of directions from regulatory authorities                                                                           |
|                                  |                                                                                                           | Remediation is required and likely to take more than 3 months                                                                                                                                                                                    |
|                                  |                                                                                                           | Non-conformance -<br>1) Multiple examples of a similar types of non-compliance with BMM environmental procedures & standards.<br>2) Could give rise to a spill with serious environmental contamination requiring significant remediation.       |
|                                  |                                                                                                           | Complaints -<br>Receiving of complaints /multiple complaints on same topics from/ to National NGO/ State                                                                                                                                         |
|                                  |                                                                                                           | <b>Timing -</b><br>Notification time-Reporting on the same day in the system.<br>Time Period Investigation within 7 days                                                                                                                         |
| Examples                         | Breach of ash dyke/waste disposal site but no immediate impact to communities/ water bodies               |                                                                                                                                                                                                                                                  |
|                                  | Unauthorized hazardous waste disposal on land (unlined) outside the plant boundary/unauthorized agencies. |                                                                                                                                                                                                                                                  |

| Intermittent wastewater discharge outside plant (not meeting standards) |            |                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Categories                                                              | Definition | Criteria                                                                                                                                                                                                                                                                                                                                                                                                          |
| Category-5<br>150 days close out                                        | Disastrous | Incident certain to cause short term and long-term impacts on environment                                                                                                                                                                                                                                                                                                                                         |
|                                                                         |            | Regulators likely to initiate show cause and may result in possible suspension or closure of operations; or attract national media coverage.                                                                                                                                                                                                                                                                      |
|                                                                         |            | Remediation is required and likely to take more than 1 year                                                                                                                                                                                                                                                                                                                                                       |
|                                                                         |            | Non-conformance -<br>1) Multiple examples of a similar types of noncompliance with BMM environmental procedures & standards.<br>2) Could give rise to a spill with serious/disastrous environmental contamination requiring expenditure of significant resources to remediate or creating a situation where remediation is not possible causing permanent damage.<br>3) Could compromise ISO 14001 certification. |
|                                                                         |            | Complaints -<br>Receiving of complaints /multiple complaints on same topics from/ to International NGO/ Central Govt. body                                                                                                                                                                                                                                                                                        |
|                                                                         |            | <b>Timing -</b><br>Notification Time-Reporting on the same day in the system.<br>Investigation Time Period Investigation within 7 days                                                                                                                                                                                                                                                                            |

### 3. VALIDITY AND DOCUMENT MANAGEMENT

#### 3.1 Document Validity

This SOP is effective from 2014/05/01 and was last reviewed on 17-01-2025. This SOP will be reviewed every 2 Years.

#### 3.2 Document Management

- 3.2.1 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.
- 3.2.2 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.
- 3.2.3 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.
- 3.2.4 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.
- 3.2.5 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.

3.2.6 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.

### **3.3 Violation of Sop**

3.3.1 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.

3.3.2 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.

3.3.3 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.

### **3.4 Disclaimer**

3.4.1 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.

3.4.2 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.

#### 4. 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.

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❖ **Annexures / Appendix**