

Black Mountain Mining

BMM-HSE-SAF-MAN-0004 BMM - HSE Manual

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Table of Contents

Change History.....	2
1. INTENT STATEMENT/ PURPOSE / SCOPE.....	5
1.1. Purpose.....	5
1.2. Process Approach.....	5
1.3. Application.....	6
1.4. Scope of the Organisation.....	7
2. APPLICABLE REFERENCE DOCUMENT.....	12
2.1. Regulatory Requirements – Mandatory Compliance Obligations.....	12
2.2. Standards And Guidelines – Non-Legislative Mandatory Compliance Obligations.....	12
3. ABBREVIATIONS & DEFINITIONS.....	12
3.1. Abbreviations.....	12
4. CONTEXT OF THE ORGANIZATION.....	12
4.1. Understanding The Organisation and its Context.....	12
4.2. Understanding The Needs And Expectations Of Interested Parties.....	14
4.3. Determining The Scope of The SHE Management System.....	14
4.4. SHE Management System and its Processes.....	15
5. LEADERSHIP.....	17
5.1. Leadership and Commitment.....	17
5.2. SHE Policy.....	18
5.3. Organizational Roles, Responsibilities and Authorities.....	19
5.4. Consultation and Participation of Workers.....	20
6. PLANNING.....	20
6.1. Actions to address Risks and Opportunities.....	20
6.2. Legal and Other Requirements.....	22
6.3. SHE Objectives and Planning to Achieve Them.....	23
7. SUPPORT.....	24
7.1. Resources.....	24
7.2. Competence.....	24
7.3. Awareness.....	25
7.4. Consultation and Communication.....	25
7.5. Documentation Requirements.....	29
8. OPERATIONAL.....	31

8.1	Operational Planning and Control.....	31
8.2	Emergency Preparedness and Response.....	34
9.	PERFORMANCE EVALUATION.....	35
9.1	Monitoring, measurement, analysis and performance evaluation: General & Evaluation of Compliance.....	35
9.2	Internal Audits: General & Program.....	41
9.3	Management Review.....	47
10.	IMPROVEMENT.....	49
10.1	Improvement General.....	49
10.2	Incident non-conformity and corrective action.....	50
10.3	Continual improvement.....	50
11.	VALIDITY AND DOCUMENT MANAGEMENT.....	50
11.1	Document Validity.....	50
11.2	Document Management.....	51
11.3	Violation of Sop.....	51
11.4	Disclaimer.....	51
12.	REVIEW AND APPROVAL.....	53
	Annexures / Appendix.....	54

1. INTENT STATEMENT/ PURPOSE / SCOPE

1.1. Purpose

The purpose of developing, implementing and maintaining the Safety, Health and Environmental management system is to promote the adoption of a process approach and ensure that our SHE performances are conducted and assessed within a structured management system to ensure that the performance not only meets, but shall continue to meet and improve Black Mountain's SHEMS, applicable compliance obligations and defined SHE policy requirements.

The intended outcome of the SHE management system is for the organization to:

- Provide a safe and healthy workplace(s)
- Operate in an environmentally responsible manner
- Prevent work related injury and / or ill health
- Proactively monitor and improve SHE performance
- Eliminate hazards and minimize SHE risks (including system deficiencies)
- Take advantage of SHE opportunities and address management system non-conformities associated with its activities
- Fulfil legal and other requirements
- Achieve SHE objectives
- Integrate other aspects of health and safety including worker wellness / wellbeing

1.2. Process Approach

For Black Mountain to function effectively, it must determine and manage numerous linked activities.

A "process" is any activity or set of activities that uses resources and enables the transformation of inputs into outputs.

Often, the process output from one process directly forms the input to the next process.

The application of a system of processes within an organization, together with the identification and interactions of these processes, and their management, to produce the desired outcome, can be referred to as the "process approach".

The SHE Management processes are applicable to all operational areas where process activities will be performed.

Black Mountain Mine has identified these processes that make up our process based SHE Management System.

Refer to the Process Interaction and BMM Context Pack

1.3. Application

This SHE Manual will be established and maintained and will include:

- The context of the organization
- Needs and expectations of interested parties
- The scope of the SHEMS
- The SHE management system processes
- Process interactions
- The SHE Policy
- The SHE objectives and planning to achieve them
- Leadership
- Customer focus
- Interaction and communication of the processes
- Roles, responsibilities and authorities
- Planning of the SHEMS
- Support processes
- Operational planning and control
- Performance evaluation
- Management review
- Improvement

The purpose of this manual is to document Black Mountain Mine's SHE strategy, policies, procedures, processes, risks and objectives which are deemed essential for the establishment and maintenance of an effective SHEMS conforming to our SHE Policy commitments.

This manual also serves a number of other purposes:

- It is a reference to policies and procedures;
- It gives confirmation that prescribed procedures and processes exist;
- It gives a reference for future decisions;
- It is a reference against which current practice can be audited;
- It is an aid to ensure uniformity of understanding of performance and continuity when personnel changes occur.

The SHE management system has been designed, developed, implemented and maintained to meet the requirements of ISO 14001: 2015 and ISO 45001: 2018. All references to ISO documentation will be to the above-mentioned codes.

1.4.1 Scope of the Organization

The scope of Black Mountain Mine involves the mining of copper, lead and zinc at the Deeps and Swartberg Operations and the supply of mined ore to the processing plant.

1.4.2 Scope of the SHE Management System

The scope of Black Mountain Mine's SHE management system defined in this manual applies to all aspects of its operation that have or can have an impact / risk on the safety, health and environment as a result of its activities, products, facilities and / or services that the organization controls or influences, with the aim to improve our performance and demonstrate continual improvement.

This includes all process from mining, processing, to the conveyancing /transport of the ore to the market.

Our SHE system complies with the international standard requirements of ISO 14001:2015 and ISO 45001: 2018.

The following areas will be out of scope for Black Mountain Mine:

- All exploration activities;
- All activities falling under VZI projects (although activities may occur on the BMM mining license area).
- Commercial businesses in Aggeneys Town

Processes, services and activities of Black Mountain Mine are illustrated in the operational flow diagram.

Refer to the Process Interaction and BMM Context Pack.

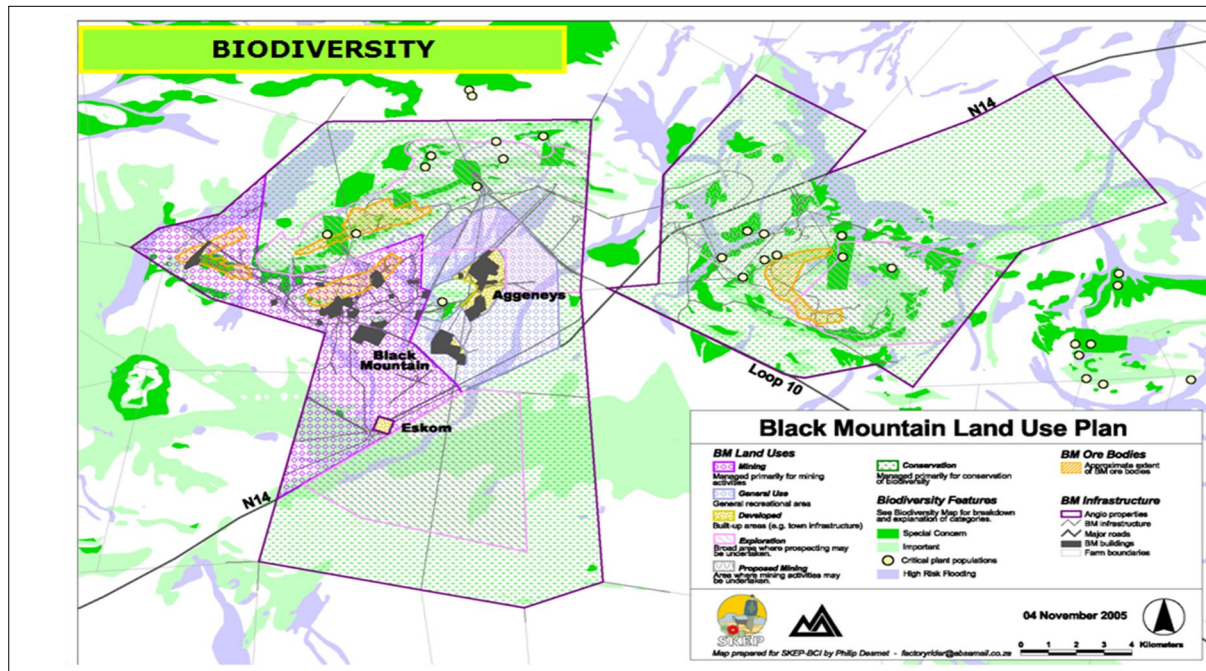
1.4.3 Process Description

1.4.3.1 Description of the Mine and Its Location

Black Mountain Mine is a base metal mine within the Vedanta Group and is located at Aggeneys in the Magisterial District of Pofadder. GPS co-ordinates: 29 15 12 27 S – 18 49 03 40 E.

Name of Mine:	Black Mountain Mining
Owner:	Vedanta
Location:	Aggeneys
Magisterial District:	Pofadder
Contact Details:	Penge Road Private Bag X01 Aggeneys 8893
Tel:	053-9839208

Figure 1 Depict the location of Black Mountain Mine



1.4.3.2 Commodities Produced

Black Mountain produces copper, lead, zinc and silver from the underground sources at Deeps and Swartberg orebodies.

BMM comprises two underground shafts, Deeps and Swartberg, and a processing plant. The Deeps shaft produces copper, lead, and zinc, with silver as a by-product. The Swartberg shaft produces primarily copper and lead, with silver as a by-product.

1.4.3.3 Mining Methods, Processes and Unique Features

Current mining and tramming activities are carried out at the Deeps orebody, at depths between 1300m and 1750m below surface and the Swartberg orebody between surface and 350m below surface.

The orebodies vary in width along strike and can be extremely wide at deeper areas. The mining, hazard identification and support strategies have evolved to suit wider stopes and increased stresses.

The mining activities used are Cut-&-Fill stoping and Blasthole open stoping as well as Crown pillar mining.

The mining operations at Black Mountain consist of the following:

- Initial and continuous development, by means of scaling, drilling, loading & tramming using trackless mobile machinery to establish systems to support current and future mining operations.

- The use of trackless mobile machinery, by means of scaling supporting, drilling, loading & tramming to extract the ore from the various ore bodies.
- The use of Swartberg road system for tramming of ore between Swartberg and surface crushing.

Mining – Surface and underground: Deeps

1. Surface Office Areas.
2. Shaft Area.
3. Engineering Offices and Surface Workshops.
4. Lamp Room and Change house Facilities.
5. Underground Stopes, Workshops, Stores, traveling ways, declines, pump stations, dams, fuel bays, Explosives issuing bays, electrical installations.

Broken Hill

1. Training Centre, Offices & Change house facilities.
2. Compressor House.
3. Backfill Plant.
4. Workshops: Boilermaker & Electrician.
5. Business Partner Workshops.

Swartberg

1. Offices.
2. Surface Workshop.
3. Underground Stopes, Workshops, Development ends, traveling ways, declines, pump stations, dams, fuel bays, Explosives issuing bays, electrical installations.

Process plant, & main workshops

1. Concentrator Plant.
2. Plant Concentrator buildings: Crusher, Mill, Floatation, Chemical Dosing, Shed, Lube Room.
3. Chemical Stores: Main, Dry Chemical.
4. Offices & Communication room.
5. Laboratory.
6. Change House facilities.
7. Compressor room.
8. Coarse and Fine Ore silos.
9. Workshops: Technician, Boilermaker, Electrician, Fitter.
10. The concentrate shed and maintenance infrastructure at Loop 10 Siding.

Commercial

1. Office and Store buildings, warehouse and salvage yard

Main Workshops

1. Offices.
2. Workshops: TMM, LDV, Tyre, Boilermaker.

Township

1. All buildings, workshops and task activities conducted.
2. Projects & Business Partners

It is important to note that for the purposes of ISO 45001:2018, Black Mountain Mining does not scope areas outside of the mining perimeter, defined by our security access gate.

However, due the nature of our location and the fact that Aggeneys is a traditional “mining town”, with water and waste management responsibilities, some of these areas will be scoped in for ISO 14001: 2018 purposes.

With regards to ISO 14001: 2018, the scope controls the mineral rights and property owned by Black Mountain Mining (Pty) Ltd which include:

1. Aggeneys town included, sewage ponds, waste transfer points

The ISO 14001: 2018 further influences the following property not directly under the control of BMC:

1. Visitors’ accommodation and catering at the Gamsberg guesthouse, North Recreation club and South Recreation club.
2. VDM concentrate storage shed in Saldanha
3. Management of offset properties through the Liaison and Steering Committee managing the offset process.

Environmental Impacts occurring outside the physical boundaries will be influenced through Business Partner Response Plan, Emergency Response Plan. Onsite business partners will be managed through the contractual and commercial conditions in service agreements via the commercial team. These influences will aid to assist and address the risk of only dealing/selecting reputable and environmentally sound suppliers and all Business Partners companies.

Refer to the Process Interaction and BMM Context Pack.

1.4.3.4 Outsourced Processes

Black Mountain Mine has several processes and functions that can be, at times, outsourced to approved external organizations.

COMPANY NAME	PERMANENT ON SITE Y/N	RESPONSIBLE MANAGER	SCOPE OF CONTRACT
Steinweld	Y	L Ziphethe	Labour Supply for Swartberg Mining
SPH	Y	L Ziphethe	Road construction, maintenance and hauling
Orateng Mining	Y	L Ziphethe	Decline rehabilitation
Khai-Ma	Y	L Ziphethe	Long anchor installation
Triplicon	Y	L Ziphethe	Long anchor installation
Springbok Toyota	Y	M Hanekom	LDV maintenance
Sandvik & Epiroc	Y	M Hanekom	Long haul machine maintenance
Bridgestone	Y	M Hanekom	Tyre management
Southey	Y	M Hanekom	Scaffolding
Springbok Rubber and Mining	Y	M Hanekom	Conveyor belt splicing
Lapua	Y	T Nemakhavhani	Mining hoses
Booyco	Y	M Hanekom	CAS
Strata	Y	M Hanekom	CAS
Jolo	Y	M Hanekom	Winding engine drivers
VDM	Y	T Nemakhavhani	Ore transport to Saldanha
Paragon Tailings	Y	T Nemakhavhani	Tailings management
Kamrod Piping	Y	M Hanekom	HDPE pipe replacement and welding
Advance FTS / Kenru	Y	M Hanekom & CM Kotze	Fire suppression systems
Prisma	Y	E Katzke	Training
DMR	Y	M Hanekom	Waste management and gardening services
Datacentrix	Y	H vd Berg	Digitilization services
Select PPE	Y	G Ephraim	Supply of PPE
SA Paramedics	Y	CM Kotze	Immediate IOD care

2. APPLICABLE REFERENCE DOCUMENT

2.1. Regulatory Requirements – Mandatory Compliance Obligations

Refer to the Black Mountain Mine Legal Register indicating relevant SHE statutes applicable to our organization.

2.2. Standards And Guidelines – Non-Legislative Mandatory Compliance Obligations

ISO 19011:2011 – Guidelines for auditing management systems

ISO 14001: 2015 – Environmental management systems – Requirements with guidance for use

ISO 14004: 2016 – Environmental management systems – General guidelines on implementation

ISO 45001: 2018 – Occupational Health and Safety Management Systems – Requirements with guidance for use

3. ABBREVIATIONS & DEFINITIONS

Definitions and abbreviations for the SHE management system terms and words are defined in the applicable documents listed below.

3.1. Abbreviations

Abbreviations listed below are relevant terms and words specific to the organization.

Word / Phrase / Abbreviation	Definition
SHE	Safety, Health & Environment
SHEMS	Safety, Health & Environmental Management System
PESTLE	Political, Economic, Social, Technological, Environmental, Legal
ISO	International Organization for Standardization
IMP	Integrated Management Program
SMART	Specific, Measurable, Achievable, Realistic and Timely
MHSA	Mine Health and Safety Act
SOP	Standard Operating Procedure
COP	Code of Practice

4. CONTEXT OF THE ORGANIZATION

4.1. Understanding The Organisation and its Context

External and internal issues relevant to Black Mountain Mine's purpose and strategic direction that can affect, either positively or negatively, our ability to achieve the intended results of our SHE management system is considered during the annual management review.

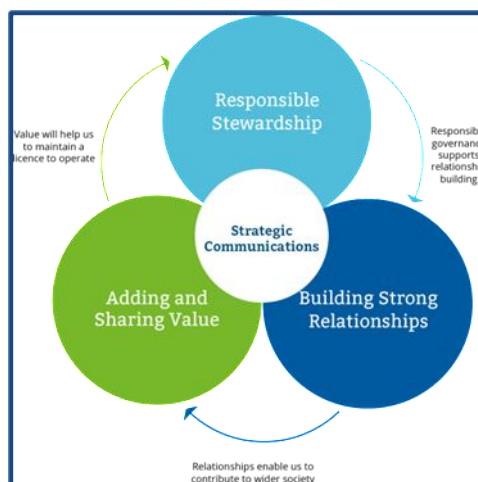
The external and internal issues were identified through a SWOT analysis which are continuously being monitored and reviewed. Annual review and approval are done at the Management Review.

From these analyses the SHE policy and objectives are compiled.

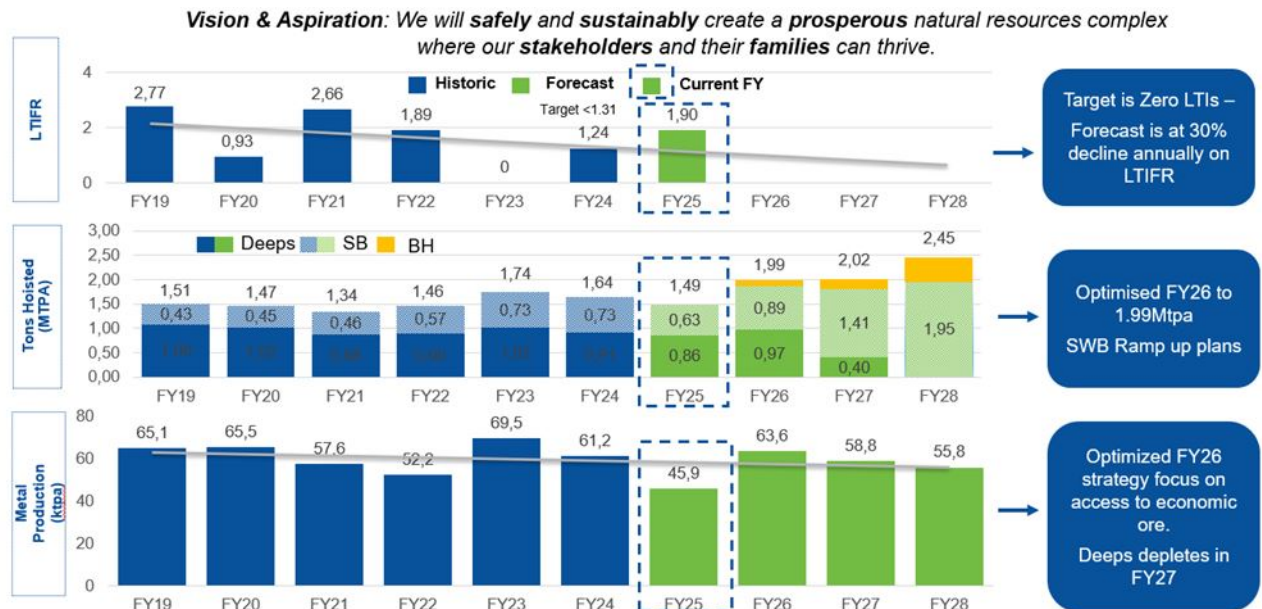
Refer to the Process Interaction and Black Mountain Mine Context Pack.



The Vedanta strategy aim to deliver growth and long-term value while upholding sustainable development through our diversified portfolio of large, long-life and low-cost assets. Our Sustainable Development Model, which comprises the four pillars of Responsible Stewardship, Building Strong Relationships, Adding and Sharing Value and Strategic Communications, provides us with a robust structure for driving our future growth, advancing our business outcomes and offering significant benefits to the communities that host our operations.



The BMC vision is defined and described in the figure below.



4.2. Understanding The Needs and Expectations of Interested Parties

The criteria followed for determining Black Mountain Mine's relevant interested parties who can have an impact on our ability to provide products and services that meet our SHEMS requirements, considered the following factors:

- Possible influence or impact on our SHE performance and decisions;
- Ability to create risks and opportunities;
- Possible influences or impact on the market;
- Ability to affect Black Mountain Mine through their decisions and activities.

Black Mountain Mine has determined the interested parties who are relevant to the SHEMS and the requirements of the interested parties.

This is in order to prevent the potential effect on the organization's ability to consistently provide products and services which meet the customer and applicable statutory and regulatory requirements.

Refer to the Process Interaction and Black Mountain Mine Context Pack.

4.3. Determining The Scope of The SHE Management System

The boundaries and applicability of the SHE management system was determined to establish the SHE scope.

The following factors was considered during the process:

- o Relevant external and internal issues

- o Relevant requirements of relevant interested parties
- o Compliance obligations
- o Black Mountain Mine functions, physical boundaries, activities, products and services provided.

The scope is maintained as documented information and available to relevant interested parties.

Refer to paragraph 3.5 of this manual – Scope of SHE Management System defined.

4.3.1 HSE Manual

This SHE manual has been prepared to describe the Black Mountain Mine SHEMS.

The scope and permissible non-applicable clauses are described defines how our SHE Objectives are achieved in respect of each element in the standard.

Responsibility is clearly defined and assigned to specific individuals to facilitate effective SHE Management control.

4.4. SHE Management System and its Processes

4.4.1 General Requirements

The SHE Management System, including processes needed and their interaction, was established, documented, implemented and maintained in accordance with the requirements of ISO 14001: 2015 and ISO 45001: 2018.

The system must be congruent with the Black Mountain Mine SHE Policy and SHE objectives.

The SHEMS will be maintained and continually improved by using the process approach methodology.

The system related procedures, forms and registers, are accessible electronically via the Black Mountain Mine Intranet Sharepoint Document Management System.

The system is maintained and continually improved through the use of the SHE Policy, SHE objectives, audit results, analysis of data, nonconformity and corrective action and management review.

To design and implement the SHE management system, Black Mountain Mine has:

- Determined the processes needed for the SHEMS and their application throughout the organization and documented them on the Process flow diagram.
- Determined the sequence and interaction of these processes, and illustrated them on a process map

- Determined the criteria and methods needed to ensure that the operation and control of the processes are effective and documented them in documented information i.e. plans, procedures, etc.
- Ensured the continuing availability of resources and information necessary to achieve planned results and continual improvement of these processes.
- Established systems to monitor, measure where applicable, and analyze these processes, and
- Established processes to identify and implement actions necessary to achieve planned results and continual improvement of these processes.

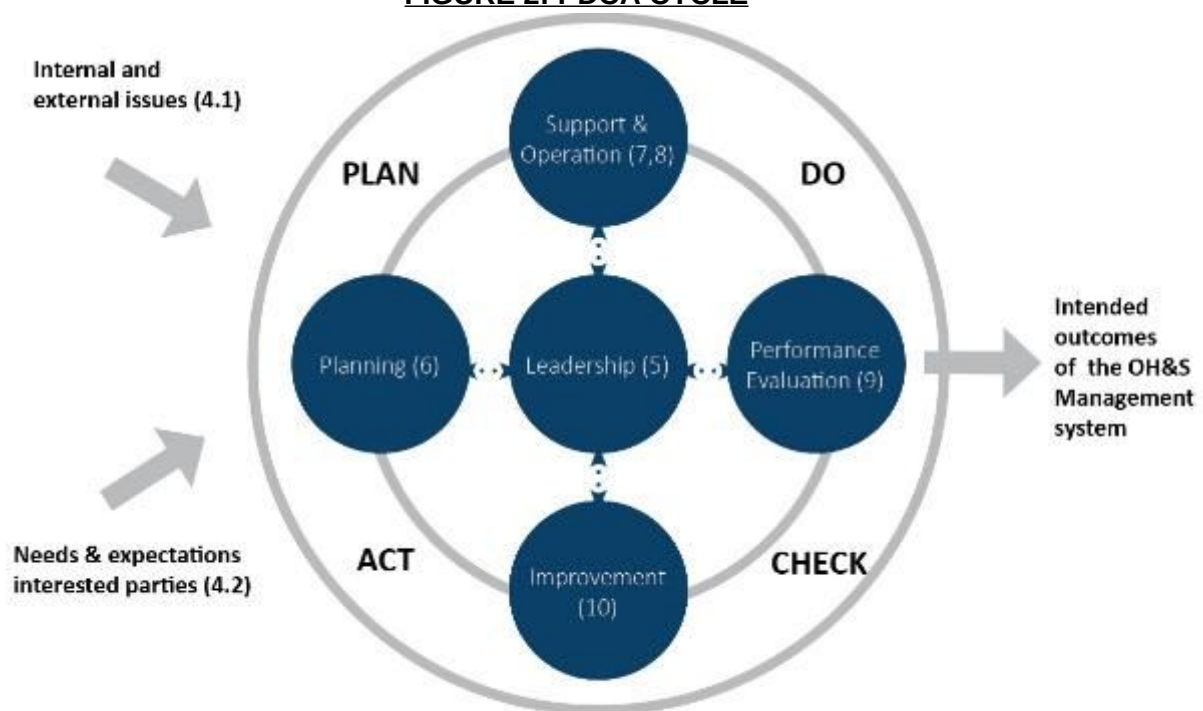
4.4.2 HSE System Processes

The SHEMS is designed as a system of interrelated processes.

All main activities of the system are defined as SHE system processes.

Management of the processes and SHE system can be achieved using the “Plan-Do-Check-Act” (PDCA) approach methodology with an overall focus on “Risk-based-thinking” aimed at preventing undesirable outcomes.

FIGURE 2: PDCA CYCLE



4.4.3 The Process Approach Promotes

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Version: **3.0** reviewed on 23-05-2025 | Information Classification: **Internal (C3)** | Page **16** of **54**

- An understanding of the intended results and requirements;
- Consideration of processes in terms of adding value and effective performance;
- Improvement of processes based on evaluation of data and information;
- Consistent and predictable results;
- Meeting requirements and customer satisfaction;
- Management of interrelated processes.

5. LEADERSHIP

5.1. Leadership and Commitment

Top management demonstrate leadership and commitment with respect to the SHE management system by taking an active role in engaging, promoting and ensuring, communicating and monitoring the performance and effectiveness of the SHEMS.

Black Mountain Mine's top management commits in ensuring that the SHEMS processes are managed within the organizations overall business.

Overall responsibility and accountability remain with top management and necessary resources made available and authority delegated to assigned persons to ensure the SHEMS is established, implemented and maintained in accordance with ISO 14001:2015 and ISO 45001:2018.

Black Mountain Mining Company's Top Management Leadership and commitment is shown by:

- Leading HSE initiatives by example;
- Being involved in HSE campaigns;
- Managing the Corporate Safety Council and participating in same. Leading and conducting cross-functional audits at BMC and ensuring rectification of non-conformances observed.
- Aligning the HSE management system with the organization's business objectives;
- Ensuring the necessary resources are available;
- Encouraging workers and other relevant interested parties to get actively involved in improving HSE performance;
- Involving everyone in HSE decision-making that affects them;
- Promoting open discussion about HSE matters.

Black Mountain Company's Top management improve the HSE culture, by:

- Providing clear and consistent leadership;
- By conducting weekly VFL's in all operational areas and logging of same on the online system;
- By awarding best VFL performers on a monthly basis;
- Conducting meetings that always includes HSE as an agenda item;
- Including business partners in daily meetings in operational areas;
- Including business partners in weekly meetings with Executive committee, to provide guidance and a framework for transparency and alignment on both ends;

- Promoting formal and informal involvement of workers;
- Making sure controls are practical and proportionate to the risks;
- By participating in monthly scheduled Critical Risk Register reviews;
- By managing and participating in Monthly HSE reviews;
- By managing and participating in quarterly HSE Management Reviews;
- By participating and actively driving improvement projects;
- Top management communicate the importance of effective HSE management and conformance to HSE management system requirements by direct involvement and through delegation of authority, as appropriate.

5.2. SHE Policy

Top Management established, implemented and maintains a SHE Policy within the defined scope of our SHEMS that is appropriate to the purpose and context of the organization that provides a framework for setting SHE objectives and supports the organization's strategic direction and context of the organization.

The policy includes our vision, principles and SHE commitment with respect to customer focus and to the protection of the environment.

Commitments relevant to the context of the organization includes:

- Pollution prevention;
- Fulfill our compliance obligations; and
- Continual improvement of our SHEMS to enhance SHE performance.

The intent of the policy is to provide an overall sense of direction and demonstrate a formal commitment by the organization, particularly top management towards SHE management.

This allows managers, employees and service providers to demonstrate continuing commitment to excellence in SHE management and ethical business practices.

The policy is reviewed annually within the framework of the SHEMS, during management reviews, to ensure continuing relevance and suitability.

The policy is communicated, understood and applied by relevant interested parties in the organization during awareness and induction training so they are able to contribute to the effectiveness of the SHEMS.

Various other policies support the HSE policy to include all business activities namely:

- Environmental Policy;
- Tailings Facility Policy;
- Sustainable Development Policy;
- Engagement Policy Statement;
- Human Rights;
- Material Stewardship & Supply Chain Management;
- Carbon Management;

The Policies are on display at visible locations throughout Black Mountain Mine.

All stakeholders are made aware of contents during induction training.

Environmental management programmes shall meet the requirements of the IFC Performance Standards, IFC HSE, ICMM Principles and Mining Sector Guidelines, as described on the Vedanta Technical Standard TS11 (Environmental Management).

This Vedanta Technical Standards (TS11) also refers to TS08 (Conducting ESIA to International Standards), TS07 (Biodiversity Management) and the management standards MS02 - Stakeholder Materiality and Risk Management.

BMM also conducts Environmental and Social Impact Assessments (ESIA's) that meets international requirements and the requirements of the Vedanta Technical Standard TS08 (Conducting ESIA's to International Standards) for all its new projects that trigger ESIA's.

5.3. Organizational Roles, Responsibilities and Authorities

Roles, responsibility and authority are communicated to relevant persons by means of i.e. job descriptions, work instructions, procedures, standard operating procedures, manuals, managerial instructions, organizational structures and legal appointments and structures.

Overall responsibility and accountability remain with top management and necessary resources made available and authority delegated to assigned persons to ensure the SHEMS is established, implemented and maintained in accordance with ISO 14001:2015 and ISO 45001:2018.

5.3.1 EXCO

Exco shall demonstrate leadership and commitment with respect to the HSE management system by:

1. Take overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities.
2. Ensuring the integration of this document requirements into Black Mountain Mine business processes.
3. Ensure that the resources needed to establish, implement, maintain and improve this document are available.
4. Direct, delegate and support other relevant management roles to enforce the effective implementation of the requirements as described in this document.

5.3.2 Heads of Departments, Managers and HSE Management

1. Support EXCO by taking responsibility and accountability for the prevention of work-related injury / ill health, as well as the provision of a safe and healthy work environment in their areas of responsibility.
2. Facilitating positive culture and continual improvement within their areas of responsibility.
3. Ensure the HSE system is integrated within their areas of responsibility.
4. Promote communication internally and externally within their areas of responsibility.

5. Protect workers from reprisal when reporting incidents, hazards, risk, and opportunities.
6. Provide and support for safety committees.

5.4. Consultation and Participation of Workers

Black Mountain Mine implemented consultation and participation processes which is applicable to all employees, to ensure the overall implementation, effectiveness and continual improvement of our SHEMS.

Such process include:

- Daily Toolbox Talks
- Weekly top management and employee engagements
- Monthly SHE Committee Meetings
- Annual Management Review Meetings
- Posters, noticeboards, electronic communication systems (reply enabled)
- Open door policy
- Communication and training on the SHEMS
- Communication of legal and other requirements
- Determining overall SHE objectives and planning on how to achieve them
- 1st, 2nd and 3rd party audits
- Risk Management program
- Training programs linked to KPI
- Accident/Incident Investigations
- Representation of all levels when:
 - o Determining the needs and expectations of interested parties
 - o Establishing the HSE Policy
 - o Assigning roles, responsibilities and authorities
 - o Determining immediate HSE objectives and planning to achieve them

6. PLANNING

6.1. Actions to address Risks and Opportunities

(Hazard / Aspect identification, risk assessment and determining controls)

During the planning of our SHEMS, the organization determines its risks and opportunities and plans actions to address them, taking the organization's internal and external issues, as well as relevant interested party requirements into consideration.

The purpose of this process is to prevent nonconformities, that includes nonconforming outputs and to determine opportunities that might enhance or achieve our SHE objective.

Black Mountain Mine will engage the services of qualified, competent persons based on their education, training and experienced consultants / employees to take lead in this process.

Once the hazards / aspects have been identified and significance evaluated, objectives and targets will be developed to mitigate the identified significant aspects / risk by top management in conjunction with departmental managers and other relevant employee's / service providers.

Objectives and targets are developed to control the potential risks / impacts of the activities, processes and services.

The SHE hazards / risk, aspects and impacts are reviewed every 2 years or when a significant change and incident requires it.

During operational changes, emphasis is placed on identifying all possible additional aspects and impacts.

The risk rating is considered when setting new targets and objectives.

When risk ratings are done, normal, abnormal and emergency situations are taken into account as well as the effectiveness of any mitigating measures implemented.

Sectional aspect registers are managed by green file holders and is the responsibility of the respective Head of Department.

Sections, with support of the Environmental Unit are responsible to update and review their aspect registers on an annual basis.

The mine wide register of aspects, which drive the mine wide objectives, are reviewed on an annual basis and is based on the sectional aspect registers.

Refer to: ENVIRONMENTAL ASPECTS SSD-ENV-SOP-027

Refer to: Register of significant environmental aspects

Black Mountain Mine also has extensive programs in place to verify the effectiveness of controls through our Critical Control Verification Program.

Results of Issue Based Risk Assessments are managed by mitigating the residual risks, thus:

- Risks that fall in the residual risk rating scale between 21 and 25 are classified as extreme risks and as such shall be deemed significant and will require action.
- For risks with identified as extreme, Issue Based Risk Assessments will be developed. It is the intention of Black Mountain Mine to cascade this down to high risks after the completion of Issue Based Risk Assessments for extreme risks.
- Following the development of Objectives and Targets, SHE Management Program shall be developed to clearly describe the actions that need to be implemented in order to achieve the objectives and targets to minimize the associated Significant Aspect / Risk.

Actions to address risks and opportunities must be planned, monitored, managed and communicated across the organization:

- Identify what your risks and opportunities are
- Analyse and prioritize your risks and opportunities

- Plan actions to address the risks
- Implement plan – take action
- Check the effectiveness of the action – does it work
- Learn from experience – continual improvement

Black Mountain Mine's Critical control standards have been identified as the current major HSE Risks on BMM and includes:

- Fall of Ground
- Explosives
- Trackless mobile machines
- Heat related disorders
- Exposure to gases, dust, and fumes
- Flammable gas
- Manual handling of material
- Slipping, Tripping and Falling
- Water Control
- Lockouts/Isolation
- Working at heights

All work conducted which fall under these key undesirable events, are considered High Risk Work and for each, a Critical Control Verification must be done.

Critical Control Verification is rolled out in sequence.

Refer to the BMM-SAF-SOP-0002 Risk Assessment Standard

Refer to the BMC-HSE-ENV-0027: Identification of Environmental Aspects

6.2. Legal and Other Requirements

Black Mountain Mine makes use of the services of legal experts (Implex) to assist with the maintenance of our Legal Framework.

This framework ensures:

- Determine applicable legislation;
- Hosts up to date legislation;
- Determine how the legislation is applicable to the organization;
- Immediate communication to the organization on all legislation;
- Legal and other requirements are kept as documented information.

Whenever existing legislation is updated or new legislation becomes applicable, the Implex system sends out a notification email to the user group, made up of responsible persons from all departments.

This notification entails the details of the legislation and a copy of the legislation, for example, the Government Gazette.

The Black Mountain Mine HSE Department will peruse the legislation to identify which departments will be affected by the legislation.

The Black Mountain Mine HSE Department will also forward the legislation to the relevant management members of the department.

The Department to which the legislation is applicable, will then identify which codes of practices, standard operating procedures, risk assessments, training material will need to be implemented or updated to account for this legislation.

This Department must then implement or update Black Mountain Mine material with the new / updated legislation.

All updated or new legislation is also discussed with relevant stakeholders at the Health and Safety Committee Meeting.

Compliance to applicable SHE legal requirements is verified during internal audits and inspections.

Legal compliance audits are also conducted.

Other requirements to which Black Mountain Mine may subscribe, e.g. SANS standards, VZI VSAP requirements, certification body requirements, are also hosted on IsoMetrix or the VZI Intranet and compliance to these are measured using the same methods.

6.3. SHE Objectives and Planning to Achieve Them

Black Mountain Mine objectives are established at relevant functions, levels and processes, as appropriate and is compatible with our strategic direction and consistent with the SHE policy and continual improvement commitments.

Objectives shall be consistent with the HSE policy, taking into account applicable compliance obligation requirements, and considering significant HSE risks and opportunities and the evaluation of results on achieving HSE objectives will be conducted during the management review session.

During the review of objectives and targets, the information acquired through audit findings, corrective actions, management review and changing management program will be considered.

It is essential to ensure that objectives and targets is:

- Realistic;
- Measurable quantifiable if practicable;
- Addresses applicable requirements;
- Monitored and reviewed for progress in achieving the SHE objectives;
- Updated as appropriate; and
- Communicated

The SHE objectives will be set and measured using the SMART technique.

SHE objectives shall be maintained as documented information and will be communicated to persons working under the organization's control and to interested parties, as necessary.

7. SUPPORT

7.1 Resources

Management accepts ultimate accountability for the SHE management system and is committed to the provision of resources, which include human resources, specialized skills, infrastructure, technology and financial resources, to establish, implement, maintain and improve the SHE Management system.

Management shall define roles, responsibilities, accountabilities and define delegating authorities to facilitate effective SHE management and shall keep record of documents.

People:

Top Management has to allocate the sufficient number of people to ensure the effective operation of its SHEMS and its processes, in order to consistently meet customer, statutory and regulatory requirements.

Infrastructure:

Top Management and operational departments must identify, provide and maintain the infrastructure necessary to enable processes to operate effectively.

Operational Environment:

The environment in which the processes are conducted in is maintained to ensure effective production and safety of employees.

The venues are inspected regularly to ensure all resources are available and in working condition.

Resources are in place to ensure that we operate and manage our operations in an environmentally responsible manner as a good corporate citizen.

Organizational Knowledge:

All organizational knowledge required for the operation and its processes, employees and business partners are identified through Training Matrix' to ensure relevant knowledge is obtained to respond to SHE changes and requirements.

7.2 Competence

Black Mountain Mine implemented a process to ensure that all employees, including contractor business partners, doing work under the control of the organization, that can affect its HSE performance and ability to fulfil its compliance obligations, are competent on the basis of appropriate education, training and experience.

The company regards the safety and health of employees, contractor business partners and the protection and minimization of impacts to our natural environment as of utmost importance and therefore strives for the SHE system to be used to provide adequate management within the work environment.

To determine the necessary competence of workers that can affect or affects Black Mountain Mine's HSE performance, training needs of all personnel are identified by

means of a training matrix for each job category to ensure that training is planned and provided accordingly.

Competency (including the ability to identify hazards) on the basis of appropriate education, training or experience is verified by means of pre and post assessment.

- a) Training material will consider the literacy levels of staff, responsibility, ability, language skills and risk exposures;
- b) Training of illiterate employees and employees who are not proficient in the language of the training material, will be done by training officers/supervisors by communicating by means of an interpreter/mother tongue and the questionnaire to be signed off by the interpreter as a witness;
- c) In order to acquire and maintain necessary competence, verifications are done to evaluate the effectiveness of actions taken;
- d) Appropriate documented information will be retained as evidence of competence.

Refer to: The Environmental Communication & Training Procedure (SOP-0026)

7.3 Awareness

All employees and contractor business partners must be aware of the Black Mountain Mine Policy, any HSE objectives relevant to them, how they are contributing to the effectiveness of the SHE system and what the implications are of not conforming to HSE requirements.

Awareness communication and training conducted includes awareness on:

- a) HSE policy and HSE objectives;
- b) Employees contribution toward the effectiveness of the SHE system including the benefits of improved SHE system;
- c) Implications and potential consequences of not conforming to the SHE management system requirements;
- d) Incidents and outcomes of investigations that are relevant to them through safety files communication and SHE 2nd Level meetings;
- e) Hazards/aspects, risks/impacts and actions determined that are relevant to them;
- f) Section 22, 23 and 83 of the MSHA communicated to employees through Toolbox Talks and notice boards.

7.4 Consultation and Communication

7.4.1 General

Processes are established for internal and external communication between various levels and functions within the organization to ensure that relevant internal and external interested parties' needs and requirements are met. The identification includes what needs to be communicated, when it should be communicated, with whom communication should take place and how communication will be done.

Safety, Health and Environmental hazards/aspects are monitored and communicated internally to employees among various levels and functions, contractor business partners, visitors and interested parties where applicable.

Communication is done with consideration to:

- The literacy/language preference of staff where an interpreter or mother tongue may be used if required;
- Culture, gender and disability will be addressed according to ethics protocols;
- Communication to illiterate employees will be done by supervisors by means of an interpreter/mother tongue;
- All communication sessions allow for employees and their representatives to raise concerns and make inputs pertaining to the SHE management system procedures, policies, and give their necessary inputs. These are two-way communication sessions, and top management responds to any issues or concerns;
- Black Mountain Mine's communication process takes into account its legal and other requirements and ensures that communication is consistent and reliable;
- Documented information (Minutes and or attendance registers) is retained where applicable.

7.4.2 Internal Communication

Information communicated internally among various levels and functions is relevant to the management system and include changes to the where necessary.

Through two-way communication sessions workers can contribute to continual improvement of the system.

Current internal communication includes:

- Toolbox Talks;
- Involvement of safety representatives to convey outcomes of discussions to the workforce;
- Discussion and feedback regarding incidents and investigations;
- Awareness of HSE risks on a daily basis (Smart Start risk assessments)
- Participation in Plan Task Observations;
- Communication during Visible Felt Leadership visits;
- Managerial Instructions;
- BMM e-mail Communication;

7.4.3 External Communication

- a) No communication regarding significant risks/ impacts will be communicated to external parties; however documents regarding significant risks / impacts are available upon request. All external communications to external / interested parties is the responsibility of the General Manager.

- b) No employees are allowed to communicate to external parties including press and media related to any activity, occurrence or incident within Black Mountain Mine.
- c) All the communications to and from external interested parties are done on a regular basis or as prescribed by contract on specific dates.
- d) BMM Environmental and Compliance objectives will be communicated using the Vedanta Sustainability Report.
- e) Annual reports required by permits, licences and authorisations must be submitted as required together with a cover letter signed.
- f) Complaints from property or mineral right owners are registered in a complaint register.
- g) The Environmental Department follows up complaints. When input from other Departments is needed, the relevant information is given for comment.
- h) All the action steps are written in the complaints register. A final sign off date when the problem has been resolved is written in the register.
- i) Complaints Process:
 - o Complaints from Interested and Affected parties, local communities or other external sources can be received by e-mail, fax, post or telephone. Complaints are recorded electronically on Complaints Register.
 - o Should a telephonic complaint be received and none of the Environmental section personnel are available, the Safety administrator on duty will receive the complaint and send this to the Environmental personnel.
 - o A unique reference number will be allocated to each complaint received.
 - o An investigation into the complaint will be conducted by the Senior Environmental Officer and where necessary in conjunction with other members of the SHE Team and department concerned.
 - o Should a complaint fall within the HSE scope, it will be recorded into the incident and non-conformance register as a complaint against the responsible section. This same procedure of incident management would then apply.
 - o For complaints with a public image influence, communication of corrective action plans to an external party is to be signed by both the Senior Environmental Officer and authorized by the General Manager before communication to the external complainant.
 - o All complainants will receive a reply to their complaint within a reasonable time period, based on the severity of the complaint.
 - o Interested and affected parties register will be updated after the complaint have been evaluated and found to be material value.

External communication comes in various forms and includes:

- VZI Management Committee (VZI ManCo) communication;
- Group digital communications;
- HZL HR communication.

The table below identifies what needs to be communicated, when it should be communicated, with whom communication should take place and how communication will be done.

WHAT	WHEN	WITH WHOM	HOW	WHO
HSE information	After changes	Employees and Contractor Business Partners	Safety files Toolbox Talks	HSE Department Management
Risks, impacts in the section	Area pre-shift meetings	Employees and Contractor Business Partners	Risk Assessments	Front line supervision
Incidents / Non conformities	During and after occurrences	Employees and Contractor Business Partners	Departmental Communication Sessions Production Meetings Flashes	HSE Department Front line supervision
Production objectives/shortcomings	Daily	Line management	Production meeting	3.1(a) Managers
Safety, Health and environment	Monthly	Full Times, Union, Management	1 st Level SHE Meeting	General Manager
Safety, Health and environment	Monthly	SHE representatives and line management	2 nd Level SHE Meetings	HOD's
Safety, Health and environment	Monthly	SHE representatives	3 rd Level SHE Meetings	Full Time Health and Safety Representatives
Safety, Health and environment	Monthly	Contractor Business Partners	Contractor Business Partner Meeting	General Manager
Legal updates	Ad-hoc	Safety Department	DMPR /DWA / DEAT communication	Implex
SHE Policy	After changes	Employees and Contractor Business Partners	Induction, Notice boards	Chief Safety Officer Senior Environmental

				Officer
Emergency Procedure	After changes	Employees and Contractor Business Partners	Notice boards	VOH Department
Environmental aspects & impacts	After changes	Employees and Contractor Business Partners	Register	Environmental practitioner / HOD's
EIA's/EMPR	Monthly	Employees and Contractor Business Partners	2 nd Level SHE Meetings	Senior Environmental Officer
Permits, licenses and exemptions	Ad-hoc or as required	Employees and Contractor Business Partners	Weekly EXCO Meeting	EXCO
HSE Information	Ad-hoc	Employees and Service Providers	Managerial Instructions	EXCO

Examples of meetings utilized for communication purposes:

1. Annual Review Meeting: Senior management reviews the BMM SHE System Performance on an annual basis.
2. Quarterly SHEC Committee meeting: Quarterly meeting held with representative directors of the BMM board of directors.
3. Monthly Exco review: Monthly meeting held by BMM Management with VZI Corporate Management.
4. Monthly HSE KPI reviews: Monthly meeting held with the General Manager and HSE Manager to discuss and report HSE performance.
5. Daily Toolbox Talk: Daily Toolbox Talk are created and distributed via the computer network and emails. The toolbox talks contain HSE communication and awareness and is attended by section supervisor and section team.
6. Ad hoc internal communications dealing with HSE issues are distributed via email to BMM all.

Examples of reports utilized for communication purposes:

1. Weekly HSE reports to BMM Management.
2. Monthly Vedanta Group HSE MIS reports (monthly consumption, intensity and incident reports for Vedanta Group compilation of report on the electronic database)
3. Annual Vedanta group GRI report environmental section of consumption, emission and discharge compilation of report as set out in the GRI index register under register
4. Audit reports generated as a result of internal and/or external results are communicated with relevant section managers, HOD's and the general manager.

7.5 Documentation Requirements

7.5.1 General

Black Mountain Mine will establish and maintain documented information as required by the ISO standard and as determined by its HSE management system as being necessary for the effectiveness of the HSE management system to ensure adequate control and availability of all essential documents, and that all documents are periodically reviewed, updated, legible, identifiable and approved.

The SHE management system is designed as a system of interrelated processes.

All main activities of the system are defined and are grouped into the core elements of the SHE management system and related documentation is referred to per core element.

The intent of documented information is to ensure that Black Mountain Mine controls for the SHE Management System is understood and effectively and efficiently implemented.

Further reference to recent documentation shall be addressed in each procedure.

The core elements are the key areas of the SHE Management System and are documented through the following procedures and applicable processes.

Black Mountain Mine maintains appropriate sets of documented information, both in electronic and hard copy that describes the core elements of the SHE Management System within the ISO 45001:2018 and ISO 14001:2015 framework.

Black Mountain Mine's SHE Management System documentation comprises the following categories:

- HSE Policy and HSE Objectives
- HSE Manual
- HSE System operational procedures and records
- HSE Forms

The HSE Department manages the central document control function for all documentation related to the HSE management system and required documentation is developed, maintained and approved through a consultation and approval process with the relevant applicable departmental personnel and approved committees.

7.5.2 Documented Information (Creating, Updating and Control)

Documented information is necessary for the effective operation of the HSE Management System.

Whenever it is created, updated and controlled, the responsible person must:

- Ensure that it is appropriately identified and described and ensure that the appropriate format and media is used.
- Ensure an adequate revision and approval process has been followed.
- Ensure to control access which emphasize the importance of information security.

The creation, updating and control of documented information will be managed through the process as set out in ***BMM-HSE-SAF-STD-0001 Document Control Standard***.

7.5.3 Control of Documented Information

1. Documented information required by the HSE management system is controlled to ensure that it is available and suitable for use, where and when it is needed.
2. Documented information will be adequately protected from loss of confidentiality, improper use or loss of integrity.
 - a. All documentation must be requested from the HSE Department (Document Controller).
 - b. Hard copies of approved documented information and related documents are kept readily available at the HSE Department.
 - c. Soft copies are kept electronically on the VZI Intranet Sharepoint Document Management System.
3. Changes in procedures and revisions will be recorded on an amendment control sheet in each procedure.
4. The latest obsolete master documents will kept for future reference in hard copy.

8. OPERATIONAL

8.1 Operational Planning and Control

8.1.1 General

Black Mountain Mine shall plan, implement, control and maintain processes needed to meet the HSE Management system requirements, wherever these are required to control operational risks, fulfil the HSE policy, objectives and comply with legal obligations. Establish criteria for the processes, implement control of the measures, maintain and retain documented information to the extent necessary to have confidence that the processes have been carried out as planned and / or adapt work to workers.

- a) Identify all significant risks/impacts in the Black Mountain Mine baseline risk assessment, issue based risk assessment, environmental impact assessments and occupational risks.
- b) Implement the control measures that will be documented in the form of either a Code of Practice, where legally required, or a Standard Operating Procedure, a managerial instruction or VZI standards, that prescribes the steps to follow to minimize, mitigate or eliminate risks/ impacts. Risk/impacts reduction as per required risk control measures identified through risk assessments and procedures.
- c) These procedures cover situations where their absence could lead to deviations from the HSE policy and objectives. Operational control includes

those services and activities of employees and suppliers that work at or render a service to Black Mountain Mine.

- d) The documented information mentioned in point (b) above shall be maintained and retained to the extent necessary to ensure processes are carried out as planned.
- e) All individuals shall be trained in accordance with IMS Clauses 7.2 and 7.3 for Competence and Awareness. Line supervisors shall be responsible for on-the-job training on Operational procedures and ensure record keeping per individual.

8.1.2 Eliminating hazards and reducing SHE risks

In determining controls or considering changing existing controls, Black Mountain Mine shall consider reducing the risks/impacts according to the following hierarchy:

- Elimination
- Control the risks/impacts at source
- Substitution
- Isolation
- Engineering controls
- Minimize the risk/impact
- Signage/warnings and/or administrative controls
- Personal protective equipment

Programs will be instituted to monitor the risk/impact to which employees and environment may be exposed to.

8.1.3 Management of Change

The organization will manage and control any change(s) that can affect or impact its HSE hazards and risks.

This includes changes to the organization's structure, personnel, management system, processes, and activities, use of materials, etc.

Such changes will be evaluated through hazard identification and risk assessment prior to their introduction.

The organization will also consider hazards and potential risks associated with new processes or operations at the design stage as well as changes in the organization, existing operations, products, services or suppliers.

The change management standard operating procedure custodian is vested in Plant Engineering with input from HSE and include:

- 1) new products, services, and processes;
- 2) changes to existing products, services, and processes;
- 3) workplace locations and surroundings;
- 4) work organization;
- 5) working conditions;
- 6) equipment;
- 7) work force;

- 8) changes to legal requirements and other requirements;
- 9) changes in knowledge or information about hazards and OH&S risks;
- 10) developments in knowledge and technology.

8.1.4 Procurement

8.1.4.1 General

Black Mountain Mine HSE has implemented a process to collaborate with the Commercial department ensuring that:

- 1) New equipment, tools or consumables are put through a process of decision making ensuring so that Black Mountain Mine HSE receive the correct items ordered.
- 2) Evaluation and selection of suppliers.
- 3) Specifications exist to assist commercial in sourcing products.

Black Mountain Mine HSE ensure that purchases are safe for use by workers by confirming that:

- 1) Equipment is supplied in accordance with a technical specification such as CE-marking and, where appropriate, is tested to ensure that it functions as intended;
- 2) Equipment is supplied in accordance with legal requirements;
- 3) Where appropriate, risk assessments are carried out in advance of the use of the equipment;
- 4) Installations are commissioned to ensure that they function as designed;
- 5) Materials are supplied in accordance with technical specifications.

Usage requirements, precautions or other protective measure are communicated and made available to workers, contractors and others who could be adversely affected.

8.1.4.2 Service Providers

To coordinate Black Mountain Mine's procurement processes, operational control includes:

- 1) Those services rendered to Black Mountain Mine by people working for or on its behalf whose
 - a. Activities and operations have significant risks / impacts; or
 - b. Service Provider workers who might be affected by Black Mountain Mine's activities and operations as well as
 - c. Service Providers' activities and operations that impact other interested parties in the work place.
- 2) These controls are included in contracts of agreements.

Service providers are audited to monitor compliance to contractual obligations and or operating permits.

8.1.4.3 Outsourcing

Black Mountain Mine will ensure that outsourced processes are controlled or influenced. The type and extent of control or influence to apply to the processes include:

- 1) Establish controls, as appropriate, to ensure that its SHE requirement(s) is (are) addressed in the design and development process for the product or service, considering all possible related SHE risks.
- 2) Determine its HSE requirement(s) for the procurement of activities, products and services, as appropriate;
- 3) Communicate all relevant HSE requirement(s) to external providers, including contractors;
- 4) Consider the need to provide information about potential significant HSE risks associated with the transportation or delivery, use, HSE risks at end-of-life treatment and final disposal of its activities, products and services.
- 5) Maintain documented information to the extent necessary to have confidence that the processes followed as planned.

8.2 Emergency Preparedness and Response

Black Mountain Mine established, implemented and maintains an Emergency Preparedness and Response COP where the potential for and response to accidents, incidents and emergency situations are defined.

Preventive actions and mitigating circumstances for addressing environmental impacts and SHE risk associated are documented.

The COP will be reviewed and revised according to a planned schedule or whenever deemed necessary, especially after an accident, incident or emergency situation has occurred.

Where practical, the emergency preparedness and response COP will be tested by means of a drill.

Emergencies listed in the COP will be drilled on an annual basis per emergency, as per the Emergency Drill Schedule.

Lessons learned and corrective / preventative actions emanating from such a drill will be documented and actioned and considered during the review of the COP.

The COP is included in the training matrices to ensure all employees and Service providers is provided with the relevant information and training related to emergency preparedness and response, as appropriate.

***Refer to Emergency Preparedness and Response COP -
BMM-HSE-VOH-COP-0002***

9.1 Monitoring, measurement, analysis and performance evaluation: General & Evaluation of Compliance

Black Mountain Mine will establish, implement and maintain processes to monitor, measure, analyze and evaluate operational activities that can have a significant impact on HSE.

This includes the evaluation of compliance through accepted criteria and relevant HSE legislation and regulations.

Analyzed results are used to determine areas of non-conformance and/or success.

Monitoring involves collecting information, such as measurements or observations, over time, using equipment or techniques that have been confirmed as being fit-for-purpose.

Measurements can be either quantitative or qualitative.

Monitoring and measurements can serve many purposes in the SHE management system such as:

- Tracking progress on achieving HSE objectives and targets / KPI's and continual improvement,
- Developing information to identify significant environmental aspects,
- Monitoring emissions and discharges to meet applicable legal requirements or other requirements to which the organization subscribes,
- Monitoring exposures to determine whether applicable legal and other requirements to which the organization subscribes have been met,
- Monitoring consumption of water, energy or raw materials to meet objectives and targets,
- Providing data to evaluate the effectiveness of operational controls, or to evaluate the needs to modify or introduce new controls,
- Monitoring incidents, injuries and ill health
- Suitable methods for monitoring and, where applicable, measurement of the SHE management system processes,
- Providing data to evaluate the performance of the SHE management system.

Leading and lagging measures are listed below that will ensure effective monitoring of the HSE performance on a regular basis.

Black Mountain Mine manages its HSE management system via the application of a system of processes and their interactions and it is essential to provide data to evaluate the performance of these management processes.

HSE MANAGEMENT PROCESS	RESPONSIBLE FOR MONITORING / MEASURING DATA	FREQUENCY	LEADING / LAGGING	METHOD
Process for defining the HSE management scope (workplace)	Chief Safety Officer Senior Environmental Officer	Annually	Leading	Monitoring the process by evaluating the effectiveness measured against key performance indicators.
				Collecting proactive information through audits, inspections, detecting routine activities or non-routine activities which are currently not managed under the current SHE management system and could have an impact on the health and safety of employees, product or service or the well-being of the environment.
				Collecting reactive information through accidents, incidents and non-conformances which occurred, detecting routine activities and non-routine activities which are not currently managed under the current SHE management system.
Process to determine strategic direction that encompasses the HSE objectives and targets	EXCO Chief Safety Officer Senior Environmental Officer	Monthly / Annually	Leading	Monitoring / tracking of objectives and targets on a monthly basis
				Included in relevant management reports
Process to manage risk Baseline Risk Assessments Issue Based Risk Assessments Continuous Risk Assessments Management of Change	EXCO	Continuous as required	Leading	As per the Risk Management and the Management of Change Procedures
Process for identifying and accessing applicable legal and other requirements	Senior Environmental Officer	Update of legal register as changes occur	Leading	Receiving communication from the legal register service provider and communication of all updated legal and other requirements to relevant management role-players.
Process for competence, training and awareness	Training Manager	Continuous	Leading	Training needs analysis Achieving of required competency (planned vs actual)
Process for document control	Compliance Officer	As per schedule / As changes occur	Leading	Achievement of scheduled documents which need to be reviewed vs documents reviewed.

Process for communication, participation and consultation	EXCO	Monthly / Annually	Leading	As per Meeting Minutes, emails, toolbox talks and sms'
DMRE requirements compliance	Responsible Manager	As required by DMRE directives	Leading	DMRE Guidelines / Guidance Notes
Process to conduct internal audits	Chief Safety Officer Senior Environmental Officer	As per schedule	Leading	Internal audit protocol
External compliance evaluation audits	EXCO	As per schedule	Leading	Verification against legislation
External system audits	Chief Safety Officer Senior Environmental Officer	Annually	Leading	ISO 14001 and ISO 45001 standard requirements
Process for managing incidents	Chief Safety Officer Senior Environmental Officer	As per occurrence	Leading	As per Incident Management Procedure
Process to implement corrective and preventative actions	Chief Safety Officer Senior Environmental Officer	As per occurrence / As required	Leading	Communication of all actions and implementing actions
Process for Emergency Preparedness and Response	EXCO VOH Manager	As per schedule	Leading	As per Emergency Preparedness COP. Collecting reactive information through accidents an incidents which occurred under emergency conditions, which are not currently managed under the current SHE management system as emergency situations
Process to conduct management review	EXCO	Annually	Leading	Evaluating the progress for achieving continual improvement regarding the SHE management system processes.

Safety Measurement and Monitoring

HSE MANAGEMENT PROCESS	RESPONSIBLE FOR MONITORING / MEASURING DATA	FREQUENCY	LEADING / LAGGING	METHOD
Verify compliance and effectiveness of operational controls	Safety Officers	As per schedule	Leading	Planned Inspections Observations Results on incidents and non-conformance will provide data to evaluate the effectiveness of operational controls, or to evaluate the need to modify or introduce new controls.
Health and Safety Representative Inspections	H&S Representatives	Monthly	Leading	Planned inspections and observations will provide data to evaluate the effectiveness of operational controls, or to evaluate the need to modify or introduce new controls.
Planned Task Observations	Management	As per schedule	Leading	Verification against accepted criteria.
Safety Statistics	Chief Safety Officer	Continuous	Leading	Analyse data, with the intention to initiate corrective action(s), whenever necessary.
Pressure Vessels / Diesel Tanks	Engineering Manager	As per schedule	Leading	Verification against accepted criteria.

Environmental Measurement and Monitoring

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HSE MANAGEMENT PROCESS	RESPONSIBLE FOR MONITORING / MEASURING DATA	FREQUENCY	LEADING / LAGGING	METHOD
Verify compliance and effectiveness of operational controls	Senior Environmental Officer	As per schedule	Leading	Planned inspections Observations Results of incidents and non-conformance will provide data to evaluate the effectiveness of operational controls, or to evaluate the need to modify or introduce new controls.
Water quality and quantity	Senior Environmental Officer	As per schedule	Leading	Water sampling and analysis Results maintained and reported
Water consumption	Senior Environmental Officer	As per schedule	Leading	Water usage will be measured by flow meters and compared against allowed quantity as per water usage license. Results will be maintained. Results will be reported.
Electricity consumption	Engineer	Monthly	Leading	The Engineer shall monitor the consumption of electricity on a monthly basis. The use of electricity shall be continuously updated electronically.
Hydrocarbon product consumption Diesel, oil and lubricants	Engineering	Monthly	Leading	As per meter records / volumes consumed.
Financial provision (closure costing)	Senior Environmental Officer	Annually	Leading	DMRE Guideline
Waste management	Senior Environmental Officer	Monthly	Leading	Record of volumes of waste as well as recyclable waste shall be kept. Volume of waste shall be entered into the online system. Waste removal from the premises shall be recorded and controlled.
Rehabilitation	Senior Environmental Officer Mine Manager	Annually	Leading	Rehabilitation programme vs actual progress.

Health & Hygiene Measurement and Monitoring

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HSE MANAGEMENT PROCESS	RESPONSIBLE FOR MONITORING / MEASURING DATA	FREQUENCY	LEADING / LAGGING	METHOD
Air quantity and distribution	VOH Manager	As per schedule	Leading	Airflow surveys
Noise and illumination	VOH Manager	As per schedule	Leading	Inspection surveys
Heat and cold stress	VOH Manager	As per schedule	Leading	Heat index and wind-chill factor
Respirable dust	VOH Manager	Monthly	Lagging	Sampling
Noise exposure	VOH Manager	Monthly	Leading / Lagging	Personal dosimetry
Occupational Health and Hygiene incidents	VOH Manager	Monthly	Lagging	Medical surveillance, personal sampling
Mine fires	VOH Manager	Continuous	Leading / Lagging	Environmental monitoring systems

Equipment

Maintenance, calibration or verification of monitoring and measuring equipment.

To assure the validity of results, monitoring equipment used to measure Safety, Health and Environmental conditions will be maintained in good working order and calibrated or verified and adjusted if necessary, against measurement standards, traceable to international or national measurement standards.

If no such standards exist, the basis used for calibration will be recorded.

Where computer software or computer systems are used to gather, analyze, or monitor data, and can affect the accuracy of SHE performance results, they will be validated to test their suitability, prior to use.

Appropriate equipment will be selected and be used in a way that will provide accurate and consistent results.

This could involve confirming the suitability of sampling methods or sampling locations or specifying that the equipment be used in a specific way.

Monitoring and measuring equipment used by external resources will be subject to the same control as in-house equipment.

External resources will be required to give assurances that their equipment conforms to the requirements.

Monitoring and measuring equipment which calibration status is unknown, or which is known to be out of calibration, will not be used and clearly identified as “not fit for use” as to prevent misuse.

Competence of employees and service providers

Conducting monitoring and measurement activities and maintenance, calibration or verification of monitoring and measuring equipment.

Internal or external resources conducting monitoring and measuring activities and maintenance, calibration or verification of monitoring and measuring equipment will be competent based on their education, training and experience.

The organization will ensure that external sources used to conduct monitoring and measurement activities and maintenance, calibration or verification of monitoring and measuring equipment are accredited to do so as defined by law.

Record of competency and accreditation will be maintained.

Applicable legal and other requirements

The organization will evaluate compliance to legal and other requirements using competent persons, either from within the organization and / or using external resources.

Internally, the organization will continuously verify compliance to legal and other requirements, using a variety of inputs to assess compliance, including:

- Internal and external audits
- Results of regulatory inspections
- Analysis of legal and other requirements
- Facility, equipment and area inspections
- Facility tours and / or direct observations
- Analysis of test results from monitoring and testing
- Reviews of documents and / or records of incidents and risk assessments

The legal register will serve as a list of HSE legislation and other requirements, which will be used to verify compliance.

Report on result of monitoring or measurement

Communication of monitoring or / and measurement will be done as per the communication processes stipulated in this manual.

Retain records

Records shall be kept as proof of monitoring and measurement.

Initiate corrective actions for deviations reported

Non-conformances will be communicated and actioned for rectification.

9.2 Internal Audits: General & Program

The auditing / assessment and reporting process implemented, aims to obtain information through internal audits about the performance and effectiveness of the HSE management system from an impartial view, ensuring that planned arrangements have been completed and that the SHE management system is effectively implemented and maintained.

The process covers the assessment / evaluation of Black Mountain, as a means of testing and evaluating achievement and performance and ensuring conformance to the ISO 14001: 2015 and ISO 45001: 2018 standard requirements and requirements from the organization.

The audit methodology follows a process based approach taking the following aspects into consideration:

- Importance of the processes;

- Performance of the processes;
- Changes affecting the organization;
- Results from previous audits and significance on non-conformances raised;
- Trends in non-conformities and complaints;
- Statutory and regulatory concerns

The audit scope, frequency and method are defined and auditor selection and conduct of the audit ensure objectivity and impartiality of the audit process.

SHE objectives, the importance of the processes concerned and changes within the organization, risks and opportunities should be audited.

Internal audit methods include:

- Direct observations of the process;
- Interviews with auditees and relevant personnel; and
- Examination of documented information

The HSE department ensured that trained auditors are involved in SHE audits to ensure objectivity of the auditing processes.

The results of the audit are documented in specified format to record non-conformances in product / process and work practices and brought to the notice of the person responsible for the area audited, who in turn shall take appropriate corrective actions within agreed time limit and ensure removal of deficiencies observed.

Follow up of the effectiveness of the corrective action is taken.

Audit Program Management and Planning

Black Mountain established, implemented and maintains an audit program that includes all operations, processes and activities defined within the boundaries of the HSE Management Manual scope, directed towards ensuring the performance and effectiveness of the SHEMS.

A risk-based process will be followed during the planning of audit programs, objectives and audit intervals / frequency and are subject to change, taking into consideration the status and importance of the areas / processes to be audited, based on the risk level, possibility level of change and the result from previous audits, incidents and non-conformances raised against the applicable area / process.

Planned audit dates may be re-scheduled due to unforeseen circumstances such as incident occurrences, DMRE visits, shut-downs, etc.

Audit Program Objectives

Top management shall ensure that the audit program objectives are established aiming at directing the planning and conduct of audits ensuring that the audit program is effectively implemented and followed.

The objectives are consistent with and supports the SHEMS policy and objectives.

- Objectives are based on:
 - o Management priorities;

- o SHEMS requirements;
- o Legal and other requirements;
- o Results of previous audits;
- o Operations, processes, products and services significant changes, etc.

The objective of internal audits is to contribute towards the improvement of the SHEMS and its performance and to determine the SHEMS effectiveness taking SHEMS compliance obligations and ISO requirements into consideration.

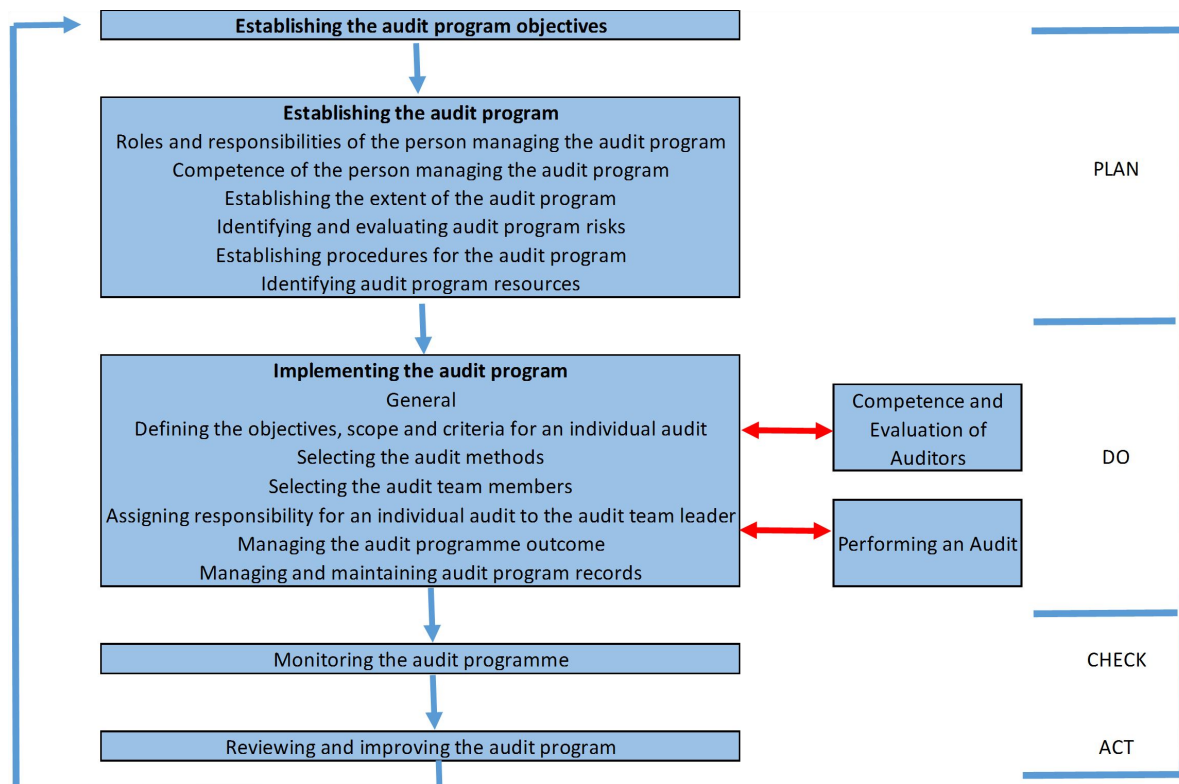


FIGURE 3: AUDIT PROCESS

Annual Audit Scheduling

Scheduling of internal processes and system audits will be done by the Chief Safety Officer, Senior Environmental Officer and VOH Manager or delegated person on a schedule.

Other organization activities / program such as management review program, external audit programs and functions will be considered when compiling the schedule.

Relevant resources required for the program and auditors will be identified and made available.

Audit Schedule consists of the following information, but are not limited to:

- Type of audit;
- Areas / processes / activities / service provider to be audited;
- Priority assessments to determine frequency;

- Planned dates;
- Current states

Progress on the compliance with and completion of the HSE audits scheduled will be reported to the Head of HSE.

Additional audits can be conducted as required.

The following circumstances can initiate additional audits:

- After occurrence of a significant change to the operation
- Increased frequency of incidents / non-conformance;
- Results of previous audits;
- Or when circumstances indicate that they are necessary

Audit Planning

Planning for the audit, the Chief Safety Officer, Senior Environmental Officer and VOH Manager or delegated person will consider the following:

- Criteria (protocol) to be used for the audit;
- Selection of appropriate auditors and audit team for the audit, taking into account the need for objectivity and impartiality;
- Audit methodology
- Confirming audit arrangements with the person(s) to be audited and with other individuals who will take part in the audit, audit arrangements can include additional training required to conform to additional requirements such as wearing of specialized personal protective equipment or special skills required.

Selection of Auditors – Competency

Setting up the audit team, the Chief Safety Officer, Senior Environmental Officer and VOH Manager or delegated person will select auditors based on skill and competency.

A competent auditor is someone who has been found competent on the basis of training, experience and knowledge and who is familiar with the Health and Safety and or Environmental hazards / aspects and risks of the areas he or she is auditing and any applicable legal and other requirements and activities he or she is auditing to enable him or her to evaluate performance and determine deficiencies.

For exposure purposes, members of the HSE team who have not yet received the required training, will also be involved in the audits.

Other subject matter experts can also be included in the selection of auditors.

Prior to executing the audit – audit team preparation

Prior to conducting the internal audits, the Chief Safety Officer, Senior Environmental Officer and VOH Manager or delegated person will convene a meeting with the selected audit team to discuss the:

- Annual audit schedule;
- Audit checklist and relevant protocol;
- Audit report submission and relevant required detailed strategies;
- Appropriate documents, records and the results of prior audits, where applicable to be obtained by the auditors per area allocated for review and preparation prior to the scheduled audit date.

Prior to executing the audit – Preparing for the audit

Prior to conducting an audit, the lead auditor will convene a meeting with the responsible person for that area to discuss the audit protocol and checklist to be used, including the feedback report after the audit.

Appropriate documents, records and the results of prior audits, where applicable will be used to verify implementation of non-conformances cleared by the auditor.

Documentation that can be reviewed during the audit includes, but is not limited to:

- Information on roles, responsibilities and authorities
- Objectives and management program
- Procedures and work instructions
- Results of hazard identification and risk assessments
- Applicable legal and other requirements
- Incident, nonconformity and corrective action reports
- Previous audit report

Executing the Audit – Verify Compliance

The auditor will make use of the ISO requirements to reduce the probability of subjectivity and inconsistency.

The auditors will examine objective evidence, use interviewing techniques, with the most knowledgeable person and perform verification activities.

Specific attention is given to corrective / preventative actions for audit findings from previous audits.

All audit findings must be documented prior to the feedback meeting.

The Auditor uses the following auditing tools, but are not limited to:

- Employee interviews, using open-ended questions allowing the employee to explain.
- Insist that employees being questioned answer for themselves.
- Not allow the department employees (under audit) to dictate the pace of the audit.
- Re-phrase misunderstood questions.
- Record reviews and condition checks.
- Acknowledge high performance levels where applicable.

The persons responsible for the area / process must accompany the auditor(s) to witness findings found.

Audit findings are discussed and agreed with the responsible person of the area / process, who are required to approve findings raised.

Attendance / participation must be signed on the checklist in the section provided.

Compile Audit Report

After completion of the audit, the auditor must capture the findings / non-conformances raised and observation / recommendations made and submit the final report to the Chief Safety Officer, Senior Environmental Officer and VOH Manager.

A copy of the audit report will be distributed.

The signed off audit report will be filed for record keeping.

Reviewing and Improving the Audit Program

The following will be considered in reviewing the program for continual improvement opportunities:

- Results and trends from audit program monitoring,
- Conformity with the audit program procedure
- Audit program records;
- Alternative or new auditing methods required;
- Effectiveness of the measures to address the risks associated with the audit program
- Confidentiality and information security

The data of the audits conducted will be used for analysis and included as an input into the annual management review meeting.

EXTERNAL AUDITS

BMM will be subject to numerous external verification audits, standing or ad hoc.

These can include:

1. DMPR audits on HSE legislative compliance.
2. External VSAP (Vedanta Sustainability Assurance Protocol) audit conducted by Vedanta Group on an annual basis.
3. An environmental legal compliance audit will be conducted every second year either through internal auditing or using an external auditing company. Where required by license conditions the said license will be audited annually.
4. EMPR compliance audit: Conducted as per the Record of Decision (ROD) issued by the Authorities.
5. Biodiversity offset audit: External five-yearly independent audit by an external and independent auditor and/or team of auditors regarding the implementation of the Biodiversity Offset Agreement by the Implementation Parties (Black Mountain Mining (Pty) Ltd and Northern Cape DFFE).
6. Pre-commissioning audits are completed when and where required with new constructions, new locations impacted and where environmental impacts and compliance must be considered. An environmental development conditions and clearance report is submitted to the relevant section head and contracting company.

7. Issue Specific Audits can be requested (internally) by the Senior Environmental Officer or externally by NAEIS or SAWIC when and where required. Aspect specific audits include Waste Management Audits, Water Management Audits, Hydrocarbon Management and Biodiversity Audits.
8. External ECO audit will be conducted as part of the requirements of ESIA approvals of new projects where such approval is required. Findings from the audit will be incorporated in the BMC EMS non-conformance system.
9. External licence, permit condition audit conducted on annual basis to determine compliance to the conditions as per the licence conditions. Licences to be included Waste licence and Water Use Licence
10. External audit of EMPR performance audit conducted on annual basis to determine compliance with the EMPR commitments.

9.3 Management Review

Top management reviews the SHE Management System at the annual management review meeting.

The objective of the review is to:

- Assess the continuing suitability, adequacy and effectiveness of the SHEMS;
- Determine if the SHEMS is thoroughly implemented and maintained
- Determine that the SHE risks are controlled;
- Determine that the progress against set strategic direction and SHE objectives have been met;
- Determine the value added
- Validate the effectiveness of the management review;
- Indicate the commitment of management and personnel;
- Demonstrate continuing commitment to the excellence in the management system and ethical business practices;
- Improve the SHEMS;
- Determine resources required;
- Identify planned changes;
- Establish if current and relevant mandatory compliance obligations (legislation) pose a risk to the business and to evaluate Black Mountain Mine's compliance to applicable SHE legislation;
- Validate the effectiveness and value of the management system and progress against set objectives and targets and con tenuous appropriateness of the formulated policy, objectives and targets; and to
- Set specific SHE objectives and determine and confirm continuous improvement of the SHEMS

The review focuses on the overall performance of the SHE management system and not on specific details, and determine the need for changes to requirements defined within the SHE management system that includes the review of the SHE policy, SHE objectives, etc.

During the review top management will evaluate the data to determine:

- The suitability and effectiveness of the SHEMS;
- Identify opportunities for improvement;
- The adequacy of resources identified and supplied, for the establishment, implementation, maintenance and continual improvement; and
- New or updated objectives and targets are set;

Management shall, after reviewing the SHE management system, make a statement as to its effectiveness, adequacy and suitability in managing the SHE policy commitments and SHE management system requirements.

If management is not satisfied with the performance of the SHEMS with regards to any of the above, they should record that decision.

The Head of HSE will chair the Management Review and must report on the overall performance of the SHEMS.

The management review meetings must be attended by the applicable SHE personnel, EXCO and where necessary, other nominated personnel, senior / top management, line management and departmental management and can include long term business partners and other identified stakeholders.

If a nominee is unable to attend the meeting, he / she must appoint a senior member of his / her team to represent him / her.

Documented information i.e. meeting minutes, agenda will be distributed to the members and the responsible participants must gather information and prepare reports for management review presentation.

Documented information of the annual review that includes observations, conclusions, recommendations and follow-up(s) is maintained for each management review meeting.

The inputs of the review will be used to determine trends in order to make decisions and take actions related to the SHEMS and may include:

- Changes in external and internal issues that are relevant to the SHEMS
- Status of action from previous management reviews
- Status / amendments of relevant interested parties' requirements
- Compliance obligations (legislation notices / drafts and amendments)
- Results of participation and consultation including communication processes
- Training requirements
- Opportunities for improvements
- Adequacy of resources
- The effectiveness of actions taken to address risks and opportunities & associated management programs
- The needs and expectations of interested parties

Information on the performance and effectiveness of the SHEMS, will include trend analysis on:

- Extent to which SHE objectives have been met;

- Complaints from public and customers with respects to environmental performance;
- Nonconformities and corrective actions;
- SHE statistics
- Monitoring and measurement results
- Internal and external audit / assessment results
- Status of emergency preparedness and response (drills)
- Changes in significant SHE risks

The output from the management review shall include any decisions and actions related to:

- Opportunities for improvement of the effectiveness of the SHE Management system and its processes
- Changes required to the SHEMS
- Resource needs;
- Possible changes to the SHE Policy, objectives and other elements of the management system.

10. IMPROVEMENT

10.1 Improvement General

This clause requires Black Mountain Mine to determine and identify opportunities for continual improvement of our SHEMS to achieve the intended outcomes of our SHE management system.

There is a requirement to actively look for opportunities to improve processes.

There are some actions that are required that cover the handling of corrective actions.

Black Mountain Mine HSE uses a range of performance evaluation tools to make recommendations for improvement and to achieve the intended outcomes of the HSE management system.

Recommendations may emerge from workers or interested party suggestions or concerns, Health & Safety Committee meetings, hazard reviews, task analysis, physical inspections, and internal audits findings.

In order to determine and select opportunities for improvement or to implement any necessary actions to meet the requirements of workers and relevant interested parties, Black Mountain Mine HSE drives improvement via the analysis of relevant data.

The data inputs for the improvement process include:

- 1) Risk and opportunity evaluations;
- 2) Assessment of the changing needs and expectations of interested parties;
- 3) Assessment of the changing needs of the business;
- 4) The conformity of existing operations, products, and services;

The effectiveness of our health and safety management system and trends in;

- 1) Accident, Incident Frequency Rate (AFR);
- 2) Number of Incident Reports;
- 3) Total Recordable Injury Rate;
- 4) Injuries beyond First Aid at work;
- 5) Near Miss Reports;
- 6) Property Damage Incidents;
- 7) Vehicle Incidents;
- 8) Occupational Illnesses;
- 9) Complaints;
- 10) Insurance claims;
- 11) Supplier performance;
- 12) Reducing or eliminating adverse HSE hazards;
- 13) Complaints and feedback;
- 14) Internal and external audit results;
- 15) Corrective action and non-conformance rates.

10.2 Incident non-conformity and corrective action

When an incident occurs, Black Mountain Mine's response is guided by our Procedure for Incident Investigation, Non-Conformity, Corrective Action and Preventive Action and the Emergency Preparedness COP and for Environmental incidents, SOP-0041: Environmental Incidents and Non-conformance.

All the corrective and preventive actions taken to eliminate / reduce the cause of non-conformances will be appropriate to the magnitude of the problem and commensurate with the impact encountered.

Any changes which will result from corrective and preventive actions, will be implemented and the documentation will be revised accordingly.

10.3 Continual improvement

The organization is required to work continually to improve the SHEMS in terms of its suitability, adequacy and effectiveness.

Causes of underperformance have to be investigated in order to support continual improvement.

Results of trend analysis have to be used and discussed to support this activity during departmental and other applicable meetings.

11. VALIDITY AND DOCUMENT MANAGEMENT

11.1 Document Validity

This Manual is effective from 2023/05/29 and was last reviewed on 23-05-2025.
This Manual will be reviewed every 1 Year.

11.2 Document Management

- 11.2.1. This Manual replaces any other Manual issued earlier by BMM to the extent specifically covered here. This Manual should be followed in letter and spirit.
- 11.2.2. 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.
- 11.2.3. Any amendment to this Manual 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.
- 11.2.4. BMM reserves the right to withdraw, modify or revise the Manual as a whole / partial without providing any justification for the same. On revision, it should be duly communicated to the personnel involved.
- 11.2.5. If compliance with this Manual ever conflicts with the applicable law, regulation, directives issued by the statutory and or regulatory authority, then compliance must be ensured with the law.
- 11.2.6. 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 Manual and which shall be approved by the approver of this Manual. Proposing of such addendum shall be the responsibility of the respective Entity's competent authority who is at an equivalent level with the Manual owner as set out in this document.

11.3 Violation of Sop

- 11.3.1. BMM follow a "Zero Tolerance Policy" with respect to non-compliance with this Manual and/or any other Manual / guidance issued by BMM and its constituent Entities.
- 11.3.2. Violation of this Manual 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 Manual will be given an opportunity to present their case prior to any determination of appropriate disciplinary actions. Violation of this Manual may also be subject to substantial civil damages, criminal fines and prison terms.
- 11.3.3. Each employee is responsible for ensuring that their conduct and the conduct of anyone reporting to them shall fully comply with this Manual. Compliances, both personal and by subordinates, will be a factor in periodic performance appraisals.

11.4 Disclaimer

- 11.4.1. This Manual 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.

11.4.2. 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.

12. 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**