

Black Mountain Mining

BMM-HSE-VOH-SOP-002A Emergency & Crisis management V4

VZI Doc #	SBU Doc #	Document Type	Review Status
BMM-HSE-VOH-SOP-004	BMM-HSE-VOH-SOP-002A	Standard Operating Procedure	Approved
Version	Confidentiality Level	Audit Standard	HOD
4.0	Internal (C3)	ISO 45001:2018	Catharina Kotze

Effective Date	Review Date	Review Cycle	Next Review Date
1 November 2002	6-9-2025	2 Years	6-9-2027

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❖ **Change History**

Modified Date	Version	Modified by	Description of change
2025/06/09	4.0	F HAEFELE	NEW SOP TEMPLATE

Table of Contents

❖	Change History.....	2
❖	Definitions and Abbreviations.....	7
1.	OVERVIEW.....	8
1.1	BMM Level 1 Incident Management Team Structure.....	8
1.2	BMM Level 2 Emergency Management Team Structure.....	9
1.3	BMM/CORPORATE Level 3 Crisis Management Team Structure.....	10
1.4	Emergency / Crisis notification and mobilization sequence.....	11
2.	INTRODUCTION & SCOPE.....	12
3.	RELATED PROCEDURES & DOCUMENTS.....	13
4.	DEFINITION OF INCIDENT, EMERGENCY & CRISIS.....	13
4.1	Level 1: Incident.....	13
4.2	Level 2: Emergency.....	14
4.3	Level 3: Crisis.....	15
5.	INCIDENT, EMERGENCY & CRISIS MANAGEMENT PROCEDURES.....	15
5.1	Incident Management Organization.....	15
5.2	Emergency Management Organization.....	16
5.3	Crisis Management Organization.....	17
6.	LEVEL 1 INCIDENT - IMT.....	22
6.1	Initiate Incident Emergency Response.....	22
6.2	Line Manager.....	22
7.	LEVEL 2 EMERGENCY – EMT.....	22
7.1	EMT Leader.....	22
7.2	Duty Leader / Operation.....	22
7.3	Communications.....	22
7.4	Legal.....	23
7.5	Government Relations.....	23
7.6	Scribe & Log Keeper.....	23
7.7	Communications Log Keeper.....	23
7.8	Emergency Room Co-ordinator.....	23
7.9	Front Line Response.....	24

8.	EXTENDED EMT (eEMT).....	24
8.1	Finance.....	24
8.2	Human Resources.....	24
8.3	Business Recovery.....	24
8.4	HSEC.....	24
8.5	Security.....	24
8.6	Occupational Medical Practitioner (Health Advisor).....	24
8.7	IT.....	24
9.	LEVEL 3 CRISIS – CMT.....	25
9.1	CMT Leader.....	25
9.2	Duty Leader / Operation.....	25
9.3	Communications.....	25
9.4	Government Relations.....	26
9.5	Legal.....	26
9.6	Scribe & Log Keeper.....	27
9.7	Communications Log Keeper.....	27
9.8	Crisis Room Co-ordinator.....	27
9.9	Front Line Response.....	27
10.	EXTENDED CMT (eCMT).....	27
11.	POST CRISIS ACTION.....	28
11.1	Post Emergency / Crisis Review.....	28
11.2	EMT/CMT Leader.....	28
11.3	EMT/CMT Members.....	28
11.4	Action Plan.....	28
11.5	EMT/CMT Deputy Leader / Operations.....	28
12.	EMERGENCY / CRISIS TEAM CONTACTS.....	29
12.1	Primary EMT / CMT Members.....	29
12.2	First Alternative EMT / CMT Members.....	30
13.	VALIDITY AND DOCUMENT MANAGEMENT.....	32
13.1.	Document Validity.....	32
13.2.	Document Management.....	32
13.3.	Violation of Sop.....	32

13.4.	Disclaimer.....	33
14.	REVIEW AND APPROVAL.....	34
❖	Annexures / Appendix.....	35
	APPENDIX 1: EMT/CMT CHECKLIST.....	35
	APPENDIX 2: CRISIS/EMERGENCY NOTIFICATION CHECKLIST.....	40
	APPENDIX 3: COMMUNICATIONS GUIDELINES.....	41
	Appendix 3A: General communications guidelines.....	41
	Appendix 3B: Guidelines for compiling a crisis-specific Q&A.....	42
	Appendix 3C: Handling the media.....	43
	Appendix 3D: Guidance on key messages.....	45
	Appendix 3E: Template for an initial media statement.....	47
	Appendix 3F: Alternative template for an initial press release.....	48
	Appendix 3G: Template for a Final Press Release.....	50
	Appendix 3H: Guidance for Spokespeople.....	51
	Appendix 3I: Guidance for Press Conferences.....	54
	Appendix 3J: Template for a Press Conference Statement.....	55
	APPENDIX 4: TEMPLATES & TOOLS.....	56
	Appendix 4A: Stakeholder Identification & Engagement Plan Template.....	56
	Appendix 4B: Stakeholder Communication Control Sheet.....	58
	Appendix 4C: Individual Action “To Do” List.....	59
	Appendix 4D: Situation Board.....	60
	Appendix 4E: Injuries & Fatalities Control Sheet.....	61
	Appendix 4F: Next of Kin (NOK) Communication Control Sheet.....	62
	Appendix 4G: Death Notification Guidelines.....	63
	Appendix 4H: Business Continuity Analysis.....	64
	Appendix 4I: Chronological Sequence of Events & Action Log Sheet.....	65
	Appendix 4J: Telephone Message Sheet.....	66
	Appendix 4K: Telephone Message Log Sheet.....	67
	Appendix 4L: Guideline for establishing a Media Briefing Room.....	68
	Appendix 4M: Guideline for establishing a Next of Kin Room.....	69
	APPENDIX 5: KEY STAKEHOLDER CONTACT DIRECTORY.....	70

❖ Definitions and Abbreviations

Word / Phrase / Abbreviation	Definition
<i>BMM</i>	Black Mountain Mining
<i>CMT</i>	Crisis Management Team
<i>Crisis</i>	A situation or event that is of a magnitude such that it has the potential to impact safety of life, lead to significant environmental damage, impact continuity of business or the reputation of BMM & Vedanta across its wider operations. Extraordinary resources are often required to manage the crisis effectively and bring it under control
<i>Crisis Management</i>	The measures, decisions and application of necessary resources to bring a crisis under control and manage it effectively.
<i>Communication</i>	Communication is exchanging (giving and receiving) information. Communication enables BMM/Vedanta to convey the aspects, risks and opportunities of their operations, and to receive information from a range of stakeholder's concerns, questions and suggestions shared in response
<i>Emergency</i>	An unplanned occurrence that may result in risks to human health, property, or the environment, and requires an immediate response in order to contain it and/or limit its consequences
<i>Emergency Response</i>	The decisions and measures taken to contain and/or mitigate the effects of an emergency, to prevent any further impact and to regain control and restore order in its immediate aftermath, and then recover to a normal state. This process is facilitated by an Emergency Response Team and Emergency Preparedness and Response Plans, which should both exist at the VZI Corporate and BMM operational level
<i>Emergency Preparedness and Response Plan</i>	A formalised document that sets out the responses and procedures to each potential incident, emergency or crisis situation that has been identified.
<i>EMT</i>	Emergency Management Team
<i>HSEC</i>	Health, Safety, Environment & Community
<i>IE&C</i>	Incident, Emergency & Crisis
<i>IMT</i>	Incident Management Team
<i>Incident</i>	An event or chain of events which caused or could have caused injury, illness, loss of assets or potential or actual damage to relationships or reputation
<i>WHO</i>	World Health Organization

1. OVERVIEW

Black Mountain Mining has a 3-tiered approach to Emergencies with a team established at each level:

- Level 1: Incident Management Team (IMT)
- Level 2: Emergency Management Team (EMT)
- Level 3: Crisis Management Team (CMT)

Each (possible) incident, emergency and crisis must be managed by any one of the appropriate level or, in the case of a crisis, jointly by operational and CMTs. In the latter case the CMT highest in the hierarchy coordinates and liaises between the CMTs involved.

Managed by the senior local representative (IMT)

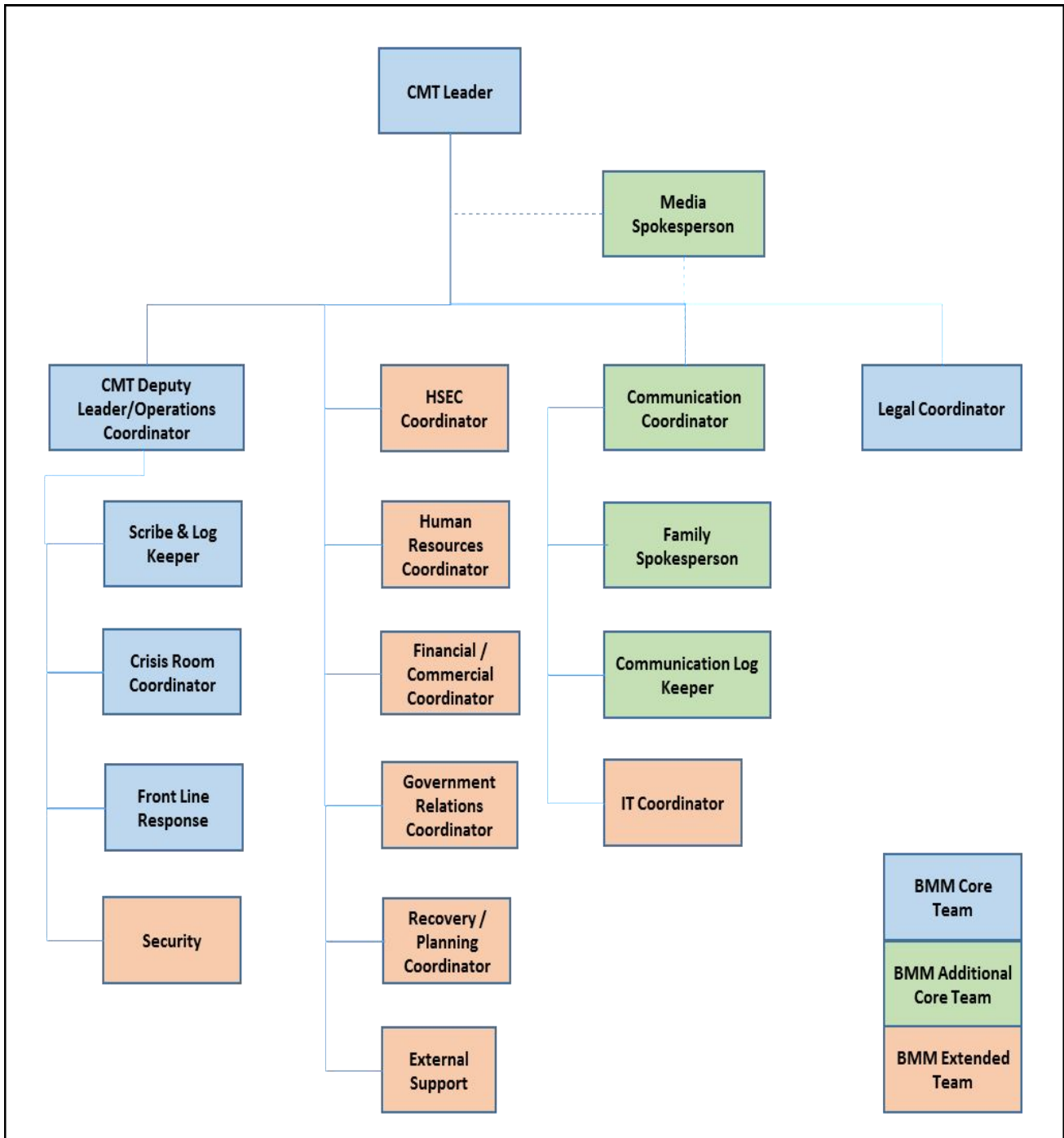
1.1 BMM Level 1 Incident Management Team Structure

- As per BMF 034 Emergency Call-out list (in conjunction with Standby List)

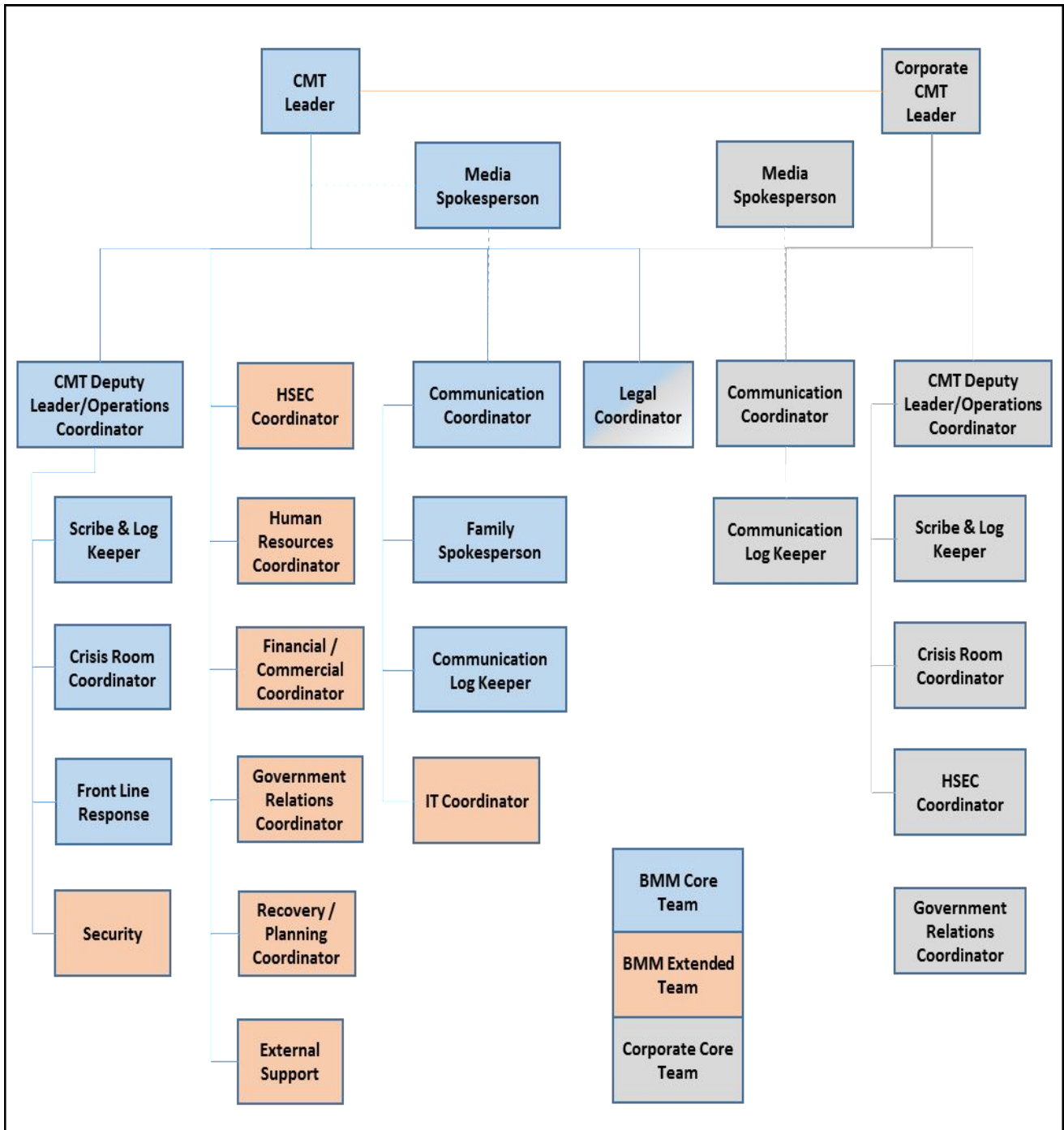
Managed by relevant department head and EMT with operation support as required

Managed by the local CMT, with cross group and functional representation

1.2 BMM Level 2 Emergency Management Team Structure



1.3 BMM/CORPORATE Level 3 Crisis Management Team Structure



1.4 Emergency / Crisis notification and mobilization sequence

2. INTRODUCTION & SCOPE

This procedure is applicable to all BMM assets and operations that fall within the boundaries of BMM. It provides the requirements and guidelines of the BMM incident, emergency and crisis management plan.

The purpose of the BMM Management Plan is to manage incidents, emergencies and crisis effectively by ensuring:

- That BMM is prepared for the types of incidents, emergencies and crisis that may occur
- A BMM and corporate emergency and crisis management response, reporting structure and responsibilities are clearly defined
- The BMM and corporate consequences of emergencies and crisis are adequately assessed from an internal and external perspective, and appropriate BMM and corporate resources are coordinated and provided
- Rapid, factual, and coordinated communications are established in the early stages of every emergency and crisis and maintained with internal and external audiences, with special emphasis on people's safety and environmental protection
- Reputational damage to BMM and the group is minimised

This procedure describes the scope of BMM's emergency and crisis response arrangements. It defines what constitutes an incident, emergency or a crisis, the structure of all BMM and Corporate Response Teams, and how and when these Response Teams should be mobilised. The procedure is designed to ensure that everyone involved in an incident, emergency or a crisis response is familiar with mobilisation and escalation procedures, as well as his or her individual role and responsibilities.

Individual emergency/crisis management plans for BMM and corporate office should be aligned to this procedure. Teams are required to test these plans periodically, with table top exercises and simulated drills.

3. RELATED PROCEDURES & DOCUMENTS

- Vedanta Technical Standard – Emergency & Crisis management – VED/CORP/SUST/TS 13
- VOH-COP 002 Emergency Preparedness & Response
- VOH-BMF 034 Emergency Call-out List

4. DEFINITION OF INCIDENT, EMERGENCY & CRISIS

Judging whether a situation is to be escalated from an incident to emergency or to a crisis can be a subjective process. If an incident is managed and closed out the normal reporting route to corporate is followed. In the event an emergency or crisis is declared the appropriate senior management will notify the COO/CEO of the escalation and the appropriate level of assistance/involvement. The Board should also be informed and involved as appropriate. The principle of prudent overreaction should be applied straight away (i.e. we should immediately start managing any potential emergency or crisis).

As general guidance, a crisis is defined within BMM as a situation that falls outside normal business continuity and emergency response arrangements. It (potentially) significantly threatens the safety or well-being of people, the environment, BMM's reputation and/or its financial bottom line on an operation or group level. Ultimately, it may put our license to operate, in the broadest sense, at risk.

Examples of situations in which the BMM Emergency or Crisis management plan might be activated include:

Potential characteristics	Examples
Represents a significant risk to BMM's reputation	Major HSE incident, major violation of business integrity, human rights violations, illegal detention of employees and contractors
Represents a risk to the safety and wellbeing of people	Attack on an asset, sabotage, disease outbreak, emission/leak threatening a community, underground mining incident, transport incident, kidnapping
Actual or perceived threat to the public on environmental or health grounds	Major HSE incident or a massive media/government/NGO campaign against a BMM asset/facility on the grounds of an alleged HSE threat
Major operational/financial impact to businesses in a particular country	Restriction/ban on activities on our products and/or services, major IT failure
Loading/unloading spill or maritime pollution that impacts on a coastline or waterway	Vessel incident (involving BMM cargo vessels) that impacts on a coastline or waterway

4.1 Level 1: Incident

Possible characteristics of level 1 trigger events

- Local (within a section) health, safety and/or environmental impact
- Minor impact on the public
- No/insignificant media interest
- No/insignificant impact on relations with local government
- Potential to escalate to a level 2 emergency; Actions is to prevent the situation to be escalated

to emergency level

People	• Minor/reversible health impact • Injury that could result in a Lost time injury
Environment	• Localised and short-term impact on an area of with little or no significant environmental or biodiversity value
Economic	• Do not require the involvement of head office staff (although they will be notified) • Section or part of section temporarily disrupted
Reputation	• No/insignificant local media interest • No/insignificant NGO interest • No/insignificant impact on community trust • No punitive sanctions, with minor senior management involvement

4.2 Level 2: Emergency

Possible characteristics of level 2 trigger events

Situations affecting the operation or major section of operation:

- Significant health, safety and environmental impact, with the potential of loss of life or the threat of multiple loss of life (e.g. employees trapped underground)
- Industrial unrest
- Customer disaffection
- Regional conflict or civil unrest
- Potential to escalate to a level 3 group crisis; Actions is to prevent the situation to be escalated to a crisis

Escalate to a level 3 crisis when:

- Risk of potential of loss of life or the threat of multiple loss of life (e.g. miners trapped underground) have been substantiated
- Highly visible consequences from an emergency
- Local and/or national media/NGO interest
- Major impact on the public
- Local and/or national media
- Deteriorating relations with local government

People	• Potential of loss of life or the threat of multiple loss of life (e.g. miners trapped underground) • Potential of a significant health impact on numerous (>5) people
Environment	• Medium term impact on an area of significant environmental or biodiversity value with difficulties for remediation
Economic	• Prolonged, continuous senior management involvement on department level • Medium-term disruption to operations • Loss of customer trust

Reputation	• National/international media coverage over several days • Shareholders and Board exercise control • Major litigation or prosecution • Loss of community trust resulting in prolonged community outrage with impact on the viability of the business • Local government involvement and scrutiny from international bodies • NGO involvement
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4.3 Level 3: Crisis

Possible characteristics of level 3 trigger events

As level 2 emergency but also including issues affecting the entire group, such as:

- Catastrophic health, safety or environmental impact
- Local and international government involvement
- Hostile reporting by international media
- International NGO activities
- Medium-term damage to group reputation
- Country-wide civil unrest
- Financial implications

A group crisis is determined by one, or a combination, of the consequences (likely) to result from the crisis event or crisis issue:

People	• Multiple (potential) fatalities or significant irreversible effects on health and safety of tens of people
Environment	• Regional and long term impact on an area of significant environmental or biodiversity value
Economic	• Prolonged, continuous senior management involvement • Operations severely disrupted, social unrest or complete loss of trust by the affected community
Reputation	• Prominent international media coverage over several days • Long-term impact on share price; shareholders desert Vedanta securities • Subsequent changes of executive-level management • Executive management in danger of criminal sanctions • Involvement by local/international government

5. INCIDENT, EMERGENCY & CRISIS MANAGEMENT PROCEDURES

5.1 Incident Management Organization

Each (potential) incident is managed through an IMT, established at section/department level. Depending on the underlying issue, consequences and impact of a (potential) incident, the IMT as dictated by the type of incident will be mobilised, at different organisational levels (department and section). BMF 034 BMM Emergency Call-out List and the Standby list will be followed. The most senior line manager will take charge of this team.

Notification of appropriate senior management must take place through the senior line manager.

5.2 Emergency Management Organization

Each (potential) emergency is managed through an EMT, established at department level. Depending on the underlying issue, consequences and impact of a (potential) emergency, one or multiple EMTs will be mobilised, at different organisational levels (operation, department and section).

EMTs are composed of a core team and an extended team.

Core Team Structure:

a) EMT Leader

Responsible for:

- Declaring an emergency
- Mobilising and leading the EMT
- Overall handling and management of the emergency including overseeing the big picture and handling mid to long-term consequences. Ensuring the EMT is fulfilling its responsibilities

b) Deputy Leader/Operations

The technical authority for event-led emergencies and the operations link/technical advisor. Assumes the role of the EMT Leader during his/her absence for extended periods. The following members report to the Deputy Leader:

- **Scribe/Log keeper** who electronically logs the key actions and decisions made by the EMT and the chronological sequence of events.
- **Emergency Room Coordinator** who is responsible for maintaining the Emergency Room, ensuring that the facilities are immediately available at all times and providing any administrative support to the team.
- **Frontline Response** who manages all incoming telephone communication and visitors from the front desk.

c) Communications

Responsible for developing a communication plan to minimise reputational impact of crisis and scenario planning support (see Appendix 3). Also responsible for liaising with the government and ensuring it is updated on the crisis status. Supports government entities in their decisions.

d) Communication Log Keeper

Responsible for compiling a log of all incoming telephone communication received by reception and Personal Assistants and the delivering the telephone messages to the responsible EMT member.

e) Government Relations

Responsible for liaising with the government and ensuring it is updated on the crisis status. Supports government entities in their decisions.

f) Legal

Responsible for developing EMT legal strategy and signing off (with the EMT Leader) all documents for internal and external communications. Also has overall responsibility for the audit trail, which includes a record of decisions made (and their rationales) and of all documents shared with external stakeholders.

Extended CMT (eCMT) Structure:

Depending on the nature of the Emergency the EMT may be supported by any of the following:

a) Finance

Responsible for assessing the financial impact of the Emergency and for ensuring the financial resources to manage it.

b) Human Resources

Responsible for HR activity in the EMT, providing specialist HR knowledge as part of all decision making, and ensuring the HR response strategy is appropriate and actions are effectively implemented.

c) Security

Responsible for providing security advice and support.

d) HSEC

Responsible for providing a clear understanding of any health, safety, environment or community (HSEC) issues and for ensuring compliance with HSEC standards, policies and regulations.

e) Occupational Medical Practitioner (Health Adviser)

Provides advice and information on any medical/health/pandemic alerts issued by the group or WHO.

f) Business Recovery

Analyses the effect of the crisis on business continuity and compiles a business recovery plan.

g) IT

Responsible for checking all IT facilities and for implementing IT business continuity measures if required.

Should circumstances dictate, the emergency will be escalated to a crisis

5.3 Crisis Management Organization

When necessary, the emergency will be escalated to a crisis. The BMM General Manager (or his alternate) will notify group of the escalation from emergency to crisis.

The core EMT members will become the CMT on site, with a CMT established at corporate level. The Corporate CMT will liaise and combine efforts with the BMM CMT.

CMTs are composed of a core team and an extended team.

Core Team Structure

a) CMT Leader

Responsible for:

- Declaring a crisis
- Mobilising and leading the CMT
- Overall handling and management of the crisis including overseeing the big picture and handling mid to long-term consequences. Ensuring the CMT is fulfilling its responsibilities

b) Deputy Leader/Operations

Is the technical authority for issue-led crisis and operations link and technical advisor for event-led crisis. Assumes the role of the CMT Leader during his/her absence for extended periods. The following members report to the Deputy Leader:

- **Scribe/Log keeper** who electronically logs the key actions and decisions made by the CMT and the chronological sequence of events.
- **Crisis Room Coordinator** who is responsible for maintaining the Crisis Room, ensuring that the facilities are immediately available at all times and providing any administrative support to the team.
- **Frontline Response** who manages all incoming telephone communication and visitors from the front desk.

c) Communications

Responsible for developing a communication plan to minimise reputational impact of crisis and scenario planning support (see Appendix 3). Also responsible for liaising with the government and ensuring it is updated on the crisis status. Supports government entities in their decisions.

d) Communication Log Keeper

Responsible for compiling a log of all incoming telephone communication received by reception and Personal Assistants and delivering the telephone messages to the responsible CMT member.

e) Government Relations

Responsible for liaising with the government and ensuring it is updated on the crisis status. Supports government entities in their decisions.

f) Legal

Responsible for developing CMT legal strategy and signing off (with the CMT Leader) all documents for internal and external communications. Also has overall responsibility for the audit trail, which includes a record of decisions made (and their rationales) and of all documents shared with external stakeholders.

Extended CMT (eCMT) Structure

Depending on the nature of the crisis the CMT may be supported by any of the following:

a) Finance

Responsible for assessing the financial impact of the crisis and ensuring of availability of financial resources.

b) Human Resources

Responsible for HR activity in the CMT, providing specialist HR knowledge as part of all decision making, and ensuring the HR response strategy is appropriate and actions are effectively implemented.

c) Investor Relations

Responsible for responding to calls from analysts, investors and other related external parties.

d) Security

Responsible for providing security advice and support.

e) HSEC

Responsible for providing a clear understanding of any health, safety, environment or community (HSEC) issues and for ensuring compliance with HSEC standards, policies and regulations.

f) Occupational Medical Practitioner (Health Adviser)

Provides advice and information on any medical/health/pandemic alerts issued by the group or WHO.

g) Business Recovery

Analyses the effect of the crisis on business continuity and compiles a business recovery plan.

h) IT

Responsible for checking all IT facilities and for implementing IT business continuity measures if required.

Although not necessarily part of the CMT, in an event-led crisis, there will also be an on-scene emergency response team, working at the affected asset with the responsibility to mitigate consequences.

Notification

Initial notification that BMM is facing a potential crisis may come from a variety of sources, including:

- Any part of BMM, including operational units and assets
- National or local government agencies/bodies
- A service company or contractor
- The capital markets
- The media
- NGOs

Notification of a crisis must be done through the normal chain of command. The CMT Leader must inform the Leader of the next level CMT of a crisis.

Each notification will be recorded, using an initial information checklist (Appendix 2) covering:

- Location, date, time and brief description of initiating event
- Name and position of person(s) reporting
- A brief description of current activities and resources mobilised
- Any government agency and/or media involvement
- Name(s) of any other company(s) involved
- Any immediate needs by the local team

Mobilization

Most incidents will be managed using relevant local emergency response plans. The local crisis manager will be aware of such incidents but if they are not declared to be an emergency or crisis, will not be involved other than giving support, as required, to the incident management team.

Local EMT members can be notified about a potential emergency and put on standby. Should the incident escalate to an emergency, the BMM CMT and group CMTs can also be put on standby to provide immediate support for any other EMT (e.g. a local EMT) actively managing an emergency. This does NOT mean that an emergency/crisis has been escalated to the higher level and accountability will not change

Escalation Process

BMM has outlined three crisis levels, to be handled as indicated below:

- **Level 1: Incident**

To be handled by a local IMT, if the impact is limited to section or part of section. This decision is at the discretion of the local senior department representative. The internal reporting and communication structures for incidents is followed

- **Level 2: Emergency**

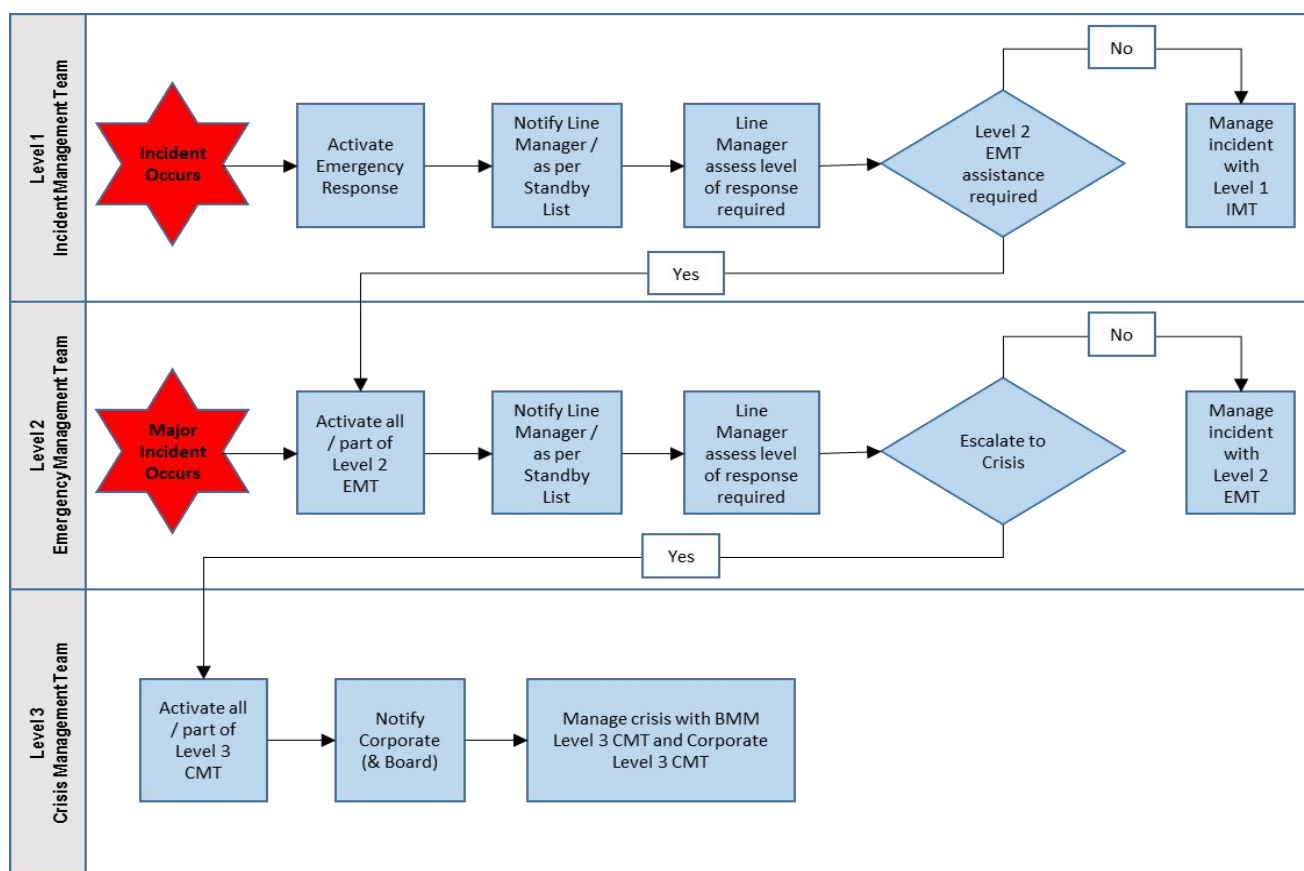
To be handled by an EMT, so established to action and mitigate the emergency to minimise the impact and prevent it to develop into a crisis.

- **Level 3: Crisis**

To be handled by the BMM CMT(s) and the group CMT, if the crisis impacts, or has the potential, to impact the group as a whole.

The highest BMM level CMT is accountable for managing the crisis. If a level 1 incident is escalated to level 2, responsibility for the outcome will move to the General Manager. If a level 2 emergency is escalated to level 3 crisis, responsibility for the outcome rests with the CEO. The BMM-level CMT remains responsible for reputation at operation level.

Escalation Flow Chart: Incident, Emergency & Crisis



6. LEVEL 1 INCIDENT - IMT

6.1 Initiate Incident Emergency Response

Initial response is activated based on type of incident and information received. The most senior line manager will take charge of the Incident Management Team and evaluate the type of emergency response required.

6.2 Line Manager

Assess situation and make decision to escalate to level 2 or continue with Incident Management Team response to manage and contain situation. The Head of Department and technical expert must be consulted in cases of uncertainty, following which a decision will be made as to the level of response required.

7. LEVEL 2 EMERGENCY – EMT

Note: The actions at operational for Level 2 Emergency and Level 3 Crisis situations will be similar, with the exception that Corporate Office will be required to establish a Level 3 Crisis team at corporate offices during a crisis

7.1 EMT Leader

Initial actions:	✓
Declare emergency and mobilize team members and facilities	
Evaluate level of emergency and escalation potential	
Brief the General Manager (level 2) and CEO (level3)	
Start briefing other key internal stakeholders	
Chair first CMT meeting - Suggested structure: - Brief the team on the situation - Clarify the team's roles, objectives and initial priorities - Ask each team member to outline their role, their key concerns and their initial priorities - Carry out a quick assessment of how the situation could escalate and potential mitigation strategies	
Assign tasks to EMT members	
Identify additional resources to help the Operation EMT where relevant (eg decide if regional media and relative response activities should be set up in consultation with Communications	
Assess if the Emergency requires up-front involvement of BMM's insurance providers and if required ensure their involvement	
Ensure actions are being recorded and that there is a proper crisis log (and guided by legal)	

7.2 Duty Leader / Operation

Initial actions:	✓
Ensure appropriate technical support resources are available	
Provide technical support to EMT leader and other team members	
Ensure contact is established with the operational team(s) and an appropriate mitigation and emergency response is under way	
Start filling the situation whiteboard based on the EMT's knowledge of the situation	

7.3 Communications

Initial actions:	✓
Mobilize communications support team	

Mobilize local media response team if required, following discussion with Leader and the asset manager	
Brief media response team	
Ensure disclosure standards and communications protocols are in place	
Draft public statement if required and get approval from Leader and Legal (see appendix 3)	
Identify all relevant stakeholders not addressed at country level and start developing their stakeholder communications plan (see appendix 4A and 4B), including "Family	

7.4 Legal

Initial actions:	✓
Advise CMT on immediate legal liabilities, risks and issues	
Co-ordinate action and set up a proper emergency log (with emergency manager), on behalf of the Leader	
Establish protocols to manage confidential or privileged documents/information	
Seek external legal advice where appropriate	
Ensure swift sign off for any documents for immediate internal and external communications (with the EMT Leader)	

7.5 Government Relations

Initial actions:	✓
Inform partners of emergency situation	
Senior government relations representative to liaise with Group Communications	
In extreme cases: country/asset manager or senior government relations representative must contact ministers overseeing the relevant industry	

7.6 Scribe & Log Keeper

Initial actions:	✓
Ensure emergency management facilities are activated and immediately available, properly equipped and functioning (excluding IT/telecoms)	
Ask other EMT members to inform you of their actions/decisions	
Start logging actions and decisions	

7.7 Communications Log Keeper

Initial actions:	✓
On instruction that the emergency team will be assembling, notify reception to be prepared for incoming calls related to an emergency	
Ensure reception has adequate telephone message sheets	
Start an electronic register of all incoming telephonic messages	

7.8 Emergency Room Co-ordinator

Initial actions:	✓
Ensure emergency management facilities are activated and immediately available, properly equipped and functioning (excluding IT/telecoms)	
Deliver telephone messages from Frontline Response to the Communications Log Keeper	
Brief security and Frontline Response on where visitors should be directed	
Assist the Scribe/Log Keeper in maintaining situational white boards	
Provide administrative and catering support to the CMT	

7.9 Front Line Response

Initial actions:	✓
Proceed to reception and take control of the switchboard and control access to the building	
Record all incoming telephone messages and hand message sheets to the Emergency Room coordinator for delivery to the Communications Log Keeper	

8. EXTENDED EMT (eEMT)

8.1 Finance

Initial actions:	✓
Determine CMT budget requirements and establish an emergency management cost account	
If required, obtain funding needed to handle the emergency	

8.2 Human Resources

Initial actions:	✓
Identify immediate issues relating to staff, contractors or communities affected e.g. in the event of injuries, fatalities or evacuation	
Ensure contact is established with those people directly or indirectly affected by the emergency (eg staff, contractors, local community or the general public)	
Ensure HR response strategy (including relative response activities) is appropriate and actions are being effectively implemented	
Mobilize HR support team if required	
Mobilize relative response activities if required, following discussion with Leader and the asset/country manager	

8.3 Business Recovery

Initial actions	✓
Assess the implications that the emergency has on business continuity	

8.4 HSEC

Initial actions	✓
Consider any immediate HSEC implications for other department and/or countries potentially involved	
Ensure that all necessary resources are made available to CMT for protecting the health and safety of affected employees, contractors and the public	

8.5 Security

Initial actions	✓
Ensure stringent access control at the affected site	
Collect, evaluate and disseminate security information related to the emergency	
Activate the external security network to exchange security information and best practice	

8.6 Occupational Medical Practitioner (Health Advisor)

Initial actions	✓
Coordinate media support with local hospitals and BMM medical care centres	

8.7 IT

Initial actions	✓
Ensure IT facilities are working in the CMT room	
Assess the need for additional internal IT support	

Set up emergency or back up IT/telecoms facilities if required	
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9. LEVEL 3 CRISIS – CMT

In the event a crisis is declared, corporate office must be notified and a Corporate EMT be established. Actions of the Asset EMT will be as per Level 2 above, but in liaison with the corporate team. The Core CMT:

9.1 CMT Leader

Ongoing actions:	✓
Chair all crisis meetings	
Assess additional support requirements	
Ensure the operational response is appropriate and effective	
Determine the strategy for proactive management of the crisis	
Brief Corporate, who in turn will brief the Board	
Review triggers for further escalation and continue to evaluate the level of crisis throughout the situation, developing short- to long-term scenarios to anticipate likely issues and developments, including wider business continuity and reputation issues	
Ensure swift approval of communication material (eg holding statements, internal and external key messages) with Legal	
If required, decide who the spokesperson will be with Communications representative	
In agreement with Communications, provide support in terms of communicating with key external stakeholders	
Ensure the crisis is treated as a priority, non-crisis work is delegated elsewhere if necessary, and continuity established for unaffected business	
Ensure timely and clear information flow within the organisation	
Liaise with senior leaders	
Manage all relationships with the government	
Maintain personal log of actions	
With relevant department leaders, decide when CMT will be stood down	
Maintain a personal log of actions	

9.2 Duty Leader / Operation

Ongoing actions:	✓
Provide skills, capabilities and resources needed to support country/asset response and recovery efforts, eg • Search and rescue expertise • Medical support • Engineering and/or production expertise • Oil spill response expertise • Electrical, instrument, equipment inspection • Process and equipment engineering • Project and construction management	
Technical and operations support for other affected parties, such as other facilities and impacted surrounding areas or community	
Support operation restart efforts	
Maintain a personal log of actions	

9.3 Communications

Ongoing actions:	✓
Identify medium- and long-term reputation risks and potential escalations triggers	

Provide advice to EMT on likely stakeholder concerns/responses	
Implement stakeholder communication plan	
Seek agreement from Legal before issuing communications	
Ensure all approved holding and press statements are translated if appropriate	
Identify potential spokesperson with Leader and ensure he/she is trained and briefed. Ensure there is consistency in message with local spokesperson(s) (see Appendix 3)	
Provide regular updates and approved communications materials to media response team	
Coordinate senior interview requests from media response team	
Liaise with Communications in the relevant department to ensure consistent messaging, effective division of tasks, etc.	
Liaise with Investor Relations to ensure consistent messaging, effective division of tasks, etc.	
Liaise with local communications managers	
Manage press briefings / conferences (see Appendix 3)	
Ensure regular internal communication to keep staff informed	
Coordinate media monitoring and ensure CMT is aware of volume/tone/issues raised in media coverage	
Coordinate with HSEC to ensure that required reporting to all agencies has been carried out and determine whether additional agencies need to be informed	
Identify existing communication material on relevant issues	
Maintain a personal log on actions	

9.4 Government Relations

Ongoing actions:	✓
Liaise with government entities to ensure consistent messaging, effective division of talks, etc.	
Support actions that the government entities undertake	
Inform the government of all actions taken by BMM	
Inform entities of status/update on crisis by either:	
- Informing partners to inform all relevant government entities; or - Informing all relevant government entities after partner approves	
Co-ordinate closely with Communications to keep both departments well informed of all external and internal communication	
Maintain a personal log of actions	

NB This is an optional role that will not be filled in all CMT's

9.5 Legal

Ongoing actions:	✓
Continue to sign off all documents for internal and external communications	
Advise CMT on the notification of regulatory authorities, including Stock Exchange announcements	
Liaise with HR on any liability/compensation payment issues	
Liaise with Finance on any medium-long term liability / penalty issues	
Retain an overview of the local legal strategy	
Produce advice to CMT on confidentiality requirements	
Ensure appropriate legal documentation is required	
Analyse and advise on responsibility and liability:	
- Ensure compliance with local laws - Review contractual issues arising as a result of the crisis	
Check for admission/implication of liability:	
- Screen written communications to government authorities - Screen all media statements/releases - Screen payments made by the company	

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Monitor claims by third parties and government authorities for:	
- Occupational and employers' liability - Contractual commitments (force majeure) - Claims by or against third parties - Lifting limitations of liability of ship owners	
Manage internal legal responsibilities between the asset/subsidiary and the BMM / Vedanta group:	
- Ensure compliance with group standards - Legal communications with other BMM (and Vedanta) joint ventured companies	
Ensure contact is established with any other BMM / Vedanta lawyers involved in the crisis	
Approve the final debrief summary of events and learning points	
Maintain a personal log of actions	

9.6 Scribe & Log Keeper

Ongoing actions:	✓
Log actions/decisions of CMT	
Update white boards when new information becomes available	

9.7 Communications Log Keeper

On-going actions:	✓
At regular intervals, collect telephone message sheets from reception	
Log all telephone messages on the log sheet	
Hand the telephone messages to the relevant person. If you are not sure of the person, ask the Communication coordinator to who the message sheet should be delivered	
At 20-minute intervals, follow up with all persons whether they have returned the calls. If they have, mark the call as returned on the log sheet. If not, remind the person that the telephone message has not been addressed.	

9.8 Crisis Room Co-ordinator

On-going actions:	✓
Undertake and administrative tasks as requested (e.g. photocopying, couriers, catering, transport, hotel accommodation etc.)	
Monitor health, fatigue, morale and stress levels of the CMT members and advise the CMT Leader as required	

9.9 Front Line Response

On-going actions:	✓
Ensure that telephone responders have current media release and that calls are being handled appropriately, and important calls are being put through to the appropriate team member	
Direct visitors and next of kin as instructed by the Crisis Room coordinator	

10. EXTENDED CMT (eCMT)

Follow the same procedure as per "8.2 Extended EMT" above

11. POST CRISIS ACTION

11.1 Post Emergency / Crisis Review

Once the emergency/crisis has been addressed and a decision taken by the EMT/CMT Leader to stand down the EMT/CMT, a post emergency/crisis review must be conducted to establish “what worked well” and “what did not work well”. The aim is to ensure continuous improvement of the emergency/crisis management systems, structures and procedures.

11.2 EMT/CMT Leader

Post crisis actions:	✓
Chair the post emergency/crisis review meeting	
Ask EMT/CMT members to provide feedback on what worked well and what did not work well	
Facilitate an action plan to address all issues identified	

11.3 EMT/CMT Members

Post crisis actions:	✓
Attend the post emergency/crisis review meeting	
Provide feedback on what worked well and what did not work well	
Provide solutions to address the issues identified	
Implement those actions assigned to you to address the issues	

11.4 Action Plan

An action plan will be compiled to address the issues identified.

11.5 EMT/CMT Deputy Leader / Operations

Post crisis actions:	✓
Take minutes of the post emergency/crisis review meeting	
Compile and distribute the action plan to address issues	
Monitor action plan progress and close out on action plan	

12. EMERGENCY / CRISIS TEAM CONTACTS

12.1 Primary EMT / CMT Members

Title	Name	Office	Mobile
EMT/CMT Leader			
Deputy Leader / Operations			
Deputy Leader / Plant			
Deputy Leader Complex			
Communications			
Government Relations			
Legal			
Finance			
Human Resources			
HSEC			
Business Recovery/Planning			
IT			
Scribe/Log Keeper			
Communications Log Keeper			
Emergency/Crisis Room Coordinator			
Frontline Response			
Security			

12.2 First Alternative EMT / CMT Members

Title	Name	Office	Mobile
EMT/CMT Leader			
Deputy Leader/Operations			
Communications			
Government Relations			
Legal			
Finance			
Human Resources			
HSEC			
Business Recovery/Planning			
IT			
Scribe/Log Keeper			
Communications Log Keeper			
Emergency/Crisis Room Coordinator			
Frontline Response			
Security			

OPERATIONS LEVEL 1 IMT LEADERS			
Operation	Name	Work	Mobile

KEY BMM NUMBERS			
Title	Name	Work	Mobile
General Manager			
Company Secretary			
Marketing			

Engineering			
Mining			
Process Plant			
Industrial			
Finance / Commercial			
Communication			
SSD			
Legal			
HR			
IT			

13. VALIDITY AND DOCUMENT MANAGEMENT

13.1. Document Validity

This SOP is effective from 2002/11/01 and was last reviewed on 09-06-2025.
This SOP will be reviewed every 2 Years.

13.2. Document Management

- 13.2.1. This SOP replaces any other SOP issued earlier by BMM to the extent specifically covered here. This SOP should be followed in letter and spirit.
- 13.2.2. 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.
- 13.2.3. Any amendment to this SOP or issue of any guidance or circular etc. under this procedure must be approved in writing by the approving authority as listed in this document.
- 13.2.4. BMM reserves the right to withdraw, modify or revise the SOP as a whole / partial without providing any justification for the same. On revision, it should be duly communicated to the personnel involved.
- 13.2.5. If compliance with this SOP ever conflicts with the applicable law, regulation, directives issued by the statutory and or regulatory authority, then compliance must be ensured with the law.
- 13.2.6. In order to ensure compliance or to address any known conflicts with the law or to address any specific local requirements, BMM may adopt local sub-procedures which shall be by way of addendum to this SOP and which shall be approved by the approver of this SOP. Proposing of such addendum shall be the responsibility of the respective Entity's competent authority who is at an equivalent level with the SOP owner as set out in this document.

13.3. Violation of Sop

- 13.3.1. BMM follow a "Zero Tolerance Policy" with respect to non-compliance with this SOP and/or any other SOP / guidance issued by BMM and its constituent Entities.
- 13.3.2. Violation of this SOP is subject to appropriate disciplinary actions which may include but not limited to termination of employment. This determination will be based on the facts and circumstances of each situation. Any accused of violation of this SOP will be given an opportunity to present their case prior to any determination of appropriate disciplinary actions. Violation of this SOP may also be subject to substantial civil damages, criminal fines and prison terms.
- 13.3.3. Each employee is responsible for ensuring that their conduct and the conduct of anyone reporting to them shall fully comply with this SOP.

Compliances, both personal and by subordinates, will be a factor in periodic performance appraisals.

13.4. Disclaimer

- 13.4.1. This SOP issued by BMM is for internal compliance and does not create, nor shall it be construed to create, directly or implicitly, any rights, duties or obligations of BMM to any person, body or legal Entity.
- 13.4.2. 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.

14. REVIEW AND APPROVAL

Content Owner(s)

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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

APPENDIX 1: EMT/CMT CHECKLIST

a) Before and while assembling the team

Action	Responsible	Status	Task
N-not started U-underway C-completed N/A – not applicable			
1. Advise next level of management	EMT/CMT Leader		Key leaders have been advised by Communications and/or Department Head and/or Country/Asset Head
2. For Group level 3 CMT, contact leaders to join audio bridge	Crisis Manager		Audio bridge assembled: all key members are contacted using the notification system to call into the crisis management audio bridge for details.
3. Contact EMT/CMT to assemble	EMT/CMT Leader or Crisis Room Coordinator		Emergency/Crisis room assembly: all members have been contacted to assemble at a designated location or by phone
4. Contact internal experts and any external expertise required	Deputy Leader / Operations		Designated internal and external expertise have been assigned and activated.
5. Activate EMT/CMT room	Emergency/Crisis Manager or Emergency/Crisis Room Coordinator		Activate the designated EMT/CMT room.
6. Activate external communications advisers (if required)	Communications		Activate external communication advisers to monitor and analyse emergency/crisis coverage.
7. Designate call flow sequence	Communications		Designate EMT/CMT call flow schedule, e.g. CMT in the morning; BMM management in the afternoon.

b) After assembling team

Action	Responsible	Status	Task
N-not started U-underway C-completed N/A – not applicable			
1. Brief EMT/CMT	EMT/CMT Leader		The EMT/CMT has been briefed on the nature of the emergency/crisis.
2. Assign person to record information	EMT/CMT Leader		EMT/CMT Leader assigns a Log Keeper to record the chronological sequence of events
3. Establish identity of the on-scene lead inside operations and communications with the scene	Deputy Leader/Operations		The BMM on-scene lead at the incident scene has been identified and has unified with the local emergency response team lead. Communications links with site/department have been established to ensure information flow.
4. Assess status of situation via on-scene lead or situation leader	Deputy Leader/Operations		Safety of employees and general public is being managed by site responders under the joint direction of the BMM on-scene lead and the local emergency response manager.
5. Establish an on-scene communications coordinator	Communications		An on-scene communications coordinator provides status information and advises management about additional resources needed for local response.
6. Assess status of regulatory agency contact by site	HSEC, Legal Gov. Relations (if appropriate)		Regulatory agencies that will be involved are identified and a dialog with contacts in each agency and the site or department is established. Site or department has made notification to regulatory agencies required by law.
7. Determine if a senior manager goes to scene	EMT/CMT Leader, Security		Decision to send senior management to the scene at this time has been considered. Transportation and security for senior management has been arranged if required.
8. Select and dispatch any needed on-scene team and equipment	EMT/CMT Leader, Deputy Leader/Operations		An on-scene team has been designated and has departed with on-scene equipment.
9. Assemble any eEMT/eCMT that might be required, and assign tasks	EMT/CMT Leader		Members of eEMTs/eCMTs have assembled in their assigned rooms and have been briefed with appropriate tasks.
10. Create and approve core statement and media response	Communications		A core statement and media response are completed and approved by EMT/CMT Leader, Legal and the Department.

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Action	Responsible	Status	Task
N-not started U-underway C-completed N/A – not applicable			
11. Communicate information to employees globally (level 3 crisis only)	Communications		Communication on situation has been provided to employees globally and a process is in place for periodic updates.
12. Assess impact on other operations and provide situational guidance	EMT/CMT Leader		An assessment of potential for the situation to impact other operations, sites, warehouses, distribution systems, etc has been made and those operations potentially impacted have been given situational guidance, eg, shut down a facility, mine, terminal, process or site.
13. Designate spokesperson	EMT/CMT Leader, Communications		A company spokesperson is designated at the scene, at BMM and at Corporate headquarters, and at any other location where a response must be made.
14. Notify state and local officials	Communications, Government Relations (if appropriate)		Government officials in affected area have been informed of the situation and the corporation's position and response plans. Impact on adjacent states or countries evaluated.
15. Monitor stock market, advise analysts and investors (level 3 crisis only)	Finance & IR		A proactive programme to communicate with analysts and investors is in place. The initial impact of the situation on analysts and investors has been assessed, the market advised if necessary and a periodic review schedule has been established to ensure effective monitoring of the stock price and analyst and investor reactions.
16. Confirm that incoming call numbers are staffed and publish if needed	Emergency/Crisis Manager Communications		Determine if any crisis numbers have been staffed and activated. Communications will issue numbers externally and internally as appropriate, via appropriate channels.
17. Assess need for online communications	Communications		Online communication needs have been assessed and are being implemented.
18. Set up media briefing centre (level dependant)	Emergency/Crisis Manager Communications		A media briefing centre has been designated. Local and Corporate-based media briefings have been discussed and, if appropriate, the times and locations have been communicated to the media and to those handling media calls.

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Action	Responsible	Status	Task
N-not started U-underway C-completed N/A – not applicable			
19. Evaluate initial media coverage and discuss appropriate response	EMT/CMT Leader, Communications		The tone of initial media coverage and the social media conversations have been assessed. The communication strategy has been reviewed, and revised if needed, and a periodic review process has been established to ensure effective monitoring of the traditional and social media.
20. Communicate to customers, partners or other affected parties	EMT/CMT Leader Marketing Communications		The impact of the incident on our direct and indirect customers/traders has been evaluated. A proactive communications program to advice of the status of their supply of product and other important information has been implemented, and a periodic review schedule has been established to ensure effective communication to customers.
21. Evaluate impact on public	Deputy Leader/Operations Legal HSEC		A team is looking at the public impact of the emergency/crisis. An initial evaluation of major or minor damage, injuries or fatalities, property damage and personal inconvenience is complete and a periodic review schedule has been established to ensure effective monitoring of public condition, needs, issues and reactions.
22. Evaluate impact on environment	HSEC		A team is looking at the environmental impact of the emergency/crisis. An initial evaluation of environmental impact on and off sites is completed. A periodic review schedule has been established to ensure effective monitoring of environmental impact.
23. Establish a field claims office	Legal, Finance. Local Business leads		Claims processing has been reviewed. If appropriate, a plan to process minor claims in the field has been completed including a waiver of liability. Third party claims handling company has been activated and is on the scene. Limits have been set.
24. Activate an "I'm Okay" Programme	Deputy Leader/Operations, HR, Security		If appropriate, activation of any additional personnel accounting has been established.
25. Identify victims,	HR		A list of injuries and fatalities is

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Action	Responsible	Status	Task
N-not started U-underway C-completed N/A – not applicable			
contact families and implement any assistance plans			complete. A plan to contact family members is being implemented. An employee assistance plan strategy is developed to work with site employees and local residents impacted by the incident.
26. Assure medical information and toxicology is communicated	HR, Product Safety		Medical assistance has been provided to local clinic and hospitals as needed. Toxicology information and medical treatment information has been communicated if appropriate. Supplies have been provided and a system is in place to monitor the medical condition of victims and assure a high level of medical support to those involved.

APPENDIX 2: CRISIS/EMERGENCY NOTIFICATION CHECKLIST

When reporting an emergency/crisis, the following information must be captured on the template provided:

- Location, date, time and brief description of initiating event
- Name and position of person(s) reporting
- A brief description of current activities and resources mobilized
- Any government agency and/or media involvement
- Name(s) of any other company(s) involved
- Any immediate needs by the local team

Appendix 2: Emergency/Crisis Notification Checklist template or continue to use current BMM

NOTIFICATION TAKEN BY:		TIME:
NOTIFICATION PROVIDED BY:		POSITION:
INCIDENT DESCRIPTION	DETAILS	
What has happened?		
Where has it happened?		
When did it happen?		
What is at risk?		
Is everybody accounted for? Casualties?		
INCIDENT STATUS	DETAILS	
Contained or escalating? Potential to escalate – what is potentially at risk?		
What are your objectives? What are you trying to make happen/prevent from happening?		
What actions are being taken? Is area secured from unauthorised access?		
Who is taking these actions? Who is responding? What resources (equipment/ manpower) are being used?		
Is there any Government agency or media involvement?		
ADDITIONAL SUPPORT	DETAILS	
Personnel		
Resources		
Specialist equipment (e.g. lifting equipment, cranes etc.)		

APPENDIX 3: COMMUNICATIONS GUIDELINES

THE EMT/CMT NOMINATES THE SPOKESPERSON(S) FOR AN EMERGENCY/ CRISIS, WHO WILL BE HANDLING MEDIA AND OTHER FORMS OF PUBLIC ENQUIRIES NEXT TO THE EMT/CMT LEADER, THE EMT/CMT MANAGER AND CORPORATE COMMUNICATION IN JOHANNESBURG

Appendix 3A: General communications guidelines

- Ensure all relevant management and media relations personnel are alerted as soon as possible. Keep employees and other internal BMM / Vedanta stakeholders informed
- Update website at least once a day
- Keep local community, civic leaders and emergency services informed and consult involved external parties (eg emergency service press officers)
- Provide timely information to other stakeholders, including shareholders, regulatory authorities, suppliers and business partners
- Prevent comment or information being offered by unauthorised employees
- Make known any management decisions relating to reconstruction, employee or community relief or future policy
- Distinguish between cause, responsibility and blame. Where we are certain of the cause, we will disclose the fact. We acknowledge our responsibility to act in the public interest. We will not discuss issues of blame until all salient facts are known and confirmed
- Remember the “3 Cs” rule when developing key messages:

Concern: express and demonstrate (through actions) concern for anyone affected

Control: demonstrate the situation is being treated as a top priority with effective leadership

Commitment: demonstrate we are doing what we can to resolve the situation as quickly as possible

Communication guidance: the “3 Cs” rule	
Key messages: CONCERN Express and demonstrate concern for anyone affected	‘We regret what has happened...’ ‘We are deeply saddened...’
Example proof points	Statement/quote outlining how BMM / Vedanta feels about what happened Set up a relative response line for friends and family members who may be concerned
Key messages: CONTROL Demonstrate control over the situation at the most senior level	‘Every possible action is being taken to bring the situation under control’

Example proof points	Detail corrective action implemented (eg emergency response team mobilised, site shut down as a precaution, controlled the spill, extinguished the fire, etc) Senior manager on way to scene... <u>Working closely with authorities...</u>
Key messages: COMMITMENT Demonstrate commitment to find out cause of incident	'We are committed to finding out why this happened'
Example proof points	Launch full internal investigation... Committed to co-operating with any...

Appendix 3B: Guidelines for compiling a crisis-specific Q&A

- Set out the rules for using the Q&A at the start of the document (e.g. Q&As should never be distributed to the press or general public)
- List key messages in the opening pages: these will form the basis of your position and answers
- Put the most likely questions at the top of the list
- If it is an extensive Q&A, separate questions into sections under broad issues
- For each issue, prepare a brief position statement: this will form the basis of your response to questions on that issue
- Check answers to avoid ambiguity, jargon and inconsistency
- Detail any background or supporting information that the interviewee may be able to offer the journalist
- Challenge the responses yourself and then ask someone (preferably someone new to the topic) to do it for you

Appendix 3C: Handling the media

The media can heavily influence the perceptions of a wide range of influential external stakeholders. It is therefore essential to communicate quickly and continually with the media during a crisis.

A holding statement should be issued within one hour and regular updates should be provided thereafter. Spokespeople should be made available and interview requests and media briefings should be arranged as quickly as possible. Provide timely, factual and accurate information to the media and cooperate as fully as possible with them, within the limits of safety, security and investor relations.

Media statements should be signed off by the CMT Leader and should not be 'wordsmithed' by a committee. Legal clearance must be quick.

Effective media approach

It is important to segment the media for communications during a crisis. Despite the pressure on your time, maintaining personal dialogue is vital with key media. Therefore you need to segment the media into a number of tiers, dividing those you must talk to individually on a daily basis from those who you push out information to en masse.

Tier 1: you should update and explain what is happening constantly, on and off the record. They will help frame what happens with other media too.

Tier 2: you should ensure that you have the correct contact information for them and that they get correct current information as things happen.

Tier 3: when you are publicly updating on your position and put out a press release. For this you should use approved distribution agencies, to push the information out globally so you hit a broader range of global media.

Key messages should be short and clear; spokespeople should be rehearsed wherever possible. In the immediate aftermath of an event-driven crisis, journalists' questions will inevitably focus on the topics below, answers should therefore be prepared as quickly as possible:

1. What happened and what caused it?
2. Who is affected?
3. Who is to blame? (don't be drawn on this; always refer to the independent inquiry)
4. What are you doing about it and when?
5. Has it happened before; what is your safety record?
6. What does it cost?

And remember:

- a) Be clear on the facts; don't speculate or guess answers to questions
- b) Ensure internal consistency of message to all media (ie nationally and internationally)
- c) Be proactive with new information
- d) Keep the flow of information constant, even if you don't have much to say

- e) Return all calls and respond to information requests
- f) Correct misinformation, rumours and mistakes
- g) Monitor the media coverage and quickly share it internally
- h) Avoid being evasive, defensive or aggressive with the media
- i) Don't apportion blame, focus on what BMM / Vedanta is doing to resolve the situation and refer to the independent inquiry

Sign-off on media statements

The sign-off procedure for media statements is:

1. Drafted by Communications
2. Reviewed by Legal (including Stock Exchange requirements)
3. Signed-off by local country/ Asset Manager / commodity department head
4. Checked with Investor Relations and Media Relations
5. Share with government and asset partners

Appendix 3D: Guidance on key messages

Key messages are derived from the strengths of the company. Messages may be constructed around the following topics:

Safety and Security

Example 1:

Safety is our number one priority. Our safety record to date has been ... which is why we are extremely surprised by what has happened.

Example 2:

BMM / Vedanta's first priority is the safety and security of its people and its operations. We are monitoring the situation very closely and have plans in place to deal with security related issues.

Commitment to HSEC principles

Example:

BMM / Vedanta's is fully committed to protecting the health and safety of its employees and of those in and around its operations and the environment.

BMM / Vedanta cares: expressions of regret

Example:

We would like to express our deepest regret for what has happened. Our thoughts and sympathy are with those people and their families who have been affected by this tragic accident and our main concern now is to do everything in our power to look after the people who have been affected by this tragedy

Trained and competent staff

Example:

Personnel at the location are trained in first aid and fire-fighting and participate in regular emergency exercises.

Cooperation with local emergency services

Example:

We are co-operating fully with all the relevant authorities and working with them in order to deal with the situation.

Investigation and mitigation

Example:

We have launched an investigation to find out what happened and we will do our utmost to make sure something like this does not happen again.

Potentially difficult questions and answers

Potentially difficult questions and answers	
What has happened?	We can tell you so far that X has happened (<i>stick to the facts, never speculate</i>). It is, however, too early to say how it could have happened. We have launched an investigation and we are co-operating with all the relevant authorities. (<i>Detail actions being taken if possible</i>)
How many people have been affected?	Tragically there have been some fatalities and unfortunately some people have been injured. I don't have any more details at the moment. Our priority is to get the injured to hospital as soon as we can and contact all the families affected by this terrible accident.
What are you doing about the situation?	At the moment we have X people at the scene/involved dealing with the situation. Our primary concern is with the safety of the people affected by the situation and we will do all we possibly can to assist them. We are working with the emergency services and relevant authorities to deal with the situation and will be launching an immediate inquiry to establish how this could have happened.
What is your safety record in this area?	Safety is our number one priority. Our record to date has been ... which has only served to heighten our shock by what has happened. We have launched an investigation to find out what happened and we will do our utmost to make sure something like this never happens again.
So how could this have happened?	It wouldn't be appropriate at this stage for me to speculate about what may or may not have caused the accident. We will have to wait for the outcome of the investigation. Our main concern now is to ensure that those affected by the <i>accident/situation</i> are given all the support they need at this very difficult time.
Has this happened before?	We have to await the outcome of the investigation to establish exactly what has happened. What we are concerned about now is to make sure that it doesn't happen again.
What are the risks that this will happen again here or elsewhere?	Clearly, when we know the outcome of the inquiry we will study it carefully and make any changes we can to reduce the likelihood of this ever happening again. However, at the moment our primary concern is to help all those affected.
Will you be offering compensation?	The issue of compensation will be dealt with in due course, but at the moment our primary concern is with the immediate needs of those affected by this tragic accident.
Will you resign?	Obviously we are taking the situation very seriously but now is not the time to be considering resignation: Our main concern is to help the people affected and to deal with the situation in hand. We will need to wait for the outcome of the inquiry to establish exactly what happened.
So who is to blame then?	At this moment in time we are still trying to deal with the situation in hand. We have launched an investigation to establish what has happened, apportioning any blame at this stage would only be speculative and highly inappropriate. Clearly we are very concerned with establishing exactly what went wrong.
Was this an accident waiting to happen?	Safety is our number one priority. We have been operating here safely for X years which has only served to heighten our shock. Clearly we will still have to await the outcome of this investigation to find out exactly what happened but I would like to express our deepest regrets for what has occurred. Our thoughts and sympathy are with those people and their families who have been affected by this tragic accident and our main concern now is to do everything in our power to look after the people who have been affected by this tragedy.

Appendix 3E: Template for an initial media statement

FOR IMMEDIATE USE: (DATE)

(Location): At approximately *(time)* today, a *(type of incident)* was reported at *(location)* involving a *(facility description or type of transportation)* that is *(owned, operated or chartered)* by *(Company)*. The incident scene is located approximately *(distance)* miles/kilometres *(direction)* of *(closest city, state or other landmark)*.

The incident resulted in *(incident description)*. At this time, the *(type of accident)* has now ceased; the incident

/is under control and clean-up is underway.

/is confined to the immediate area; no additional impact is expected.

/continues, but will be brought under control as quickly and safely as possible.

At this time, all personnel near the incident scene are still being accounted for.

(Company) has activated its emergency response plan, mobilised its trained *(Emergency Response and/or CMT)*, and requested other resources including *(other local, industry or contractor responders)*.

(Company) has notified all relevant authorities of the incident, and will implement a coordinated response with *(list authorities)*. The cause of the incident will be investigated as soon as it is safe to do so.

/At this time, no *(site, shoreline, facility or community)* impact is expected

/As a safety precaution, *(Company or relevant authority)* has recommended that all persons within *(distance)* of the incident should *(describe protective actions such as evacuate, shelter in place, or avoid the area.)*

(Company) sincerely regrets any inconvenience related to this incident. Right now, the priorities are

/limiting any further impact to the health and wellbeing of personnel, responders and communities impacted,

/bringing the situation under control, and minimizing any impact to the environment.

/For more information, please visit the website at *(URL)*.

/For more information please contact: *(Name)*, *(Company)* at *(area code & phone number)*

(Name), *(Company/external organisation)* at *(area code & phone number)*

-end-

Appendix 3F: Alternative template for an initial press release

FOR IMMEDIATE USE: *(DATE)*

(Location): At approximately *(time)* today, a *(type of incident)* was reported at *(location)* involving a *(facility description)* that is *(owned, operated, or chartered)* by *(Company)*. The incident scene is located approximately *(distance)* miles/kilometres *(direction)* of *(closest city, state or other landmark)*.

The incident resulted in *(description of incident)*. At this time, the *(description of incident)* /is confined to the immediate area; no additional impact is expected.

/continues, but will be brought under control as quickly and as safely as possible.

/is now stopped; the incident is under control and clean-up is underway.

A total of *(number)* personnel were *(on scene or on board)* at the time of the incident.

/At this time, there is no confirmation of any deaths or serious injuries.

/We deeply regret to report that *(deaths and/or serious injuries)* have been confirmed.

The injured have been transported to *(name)* Hospital which will release more information after family members have been notified.

A total of *(number)* response personnel are now *(en route or on scene)*, along with *(list number and type of response equipment)*. At this time, no additional *(site, shoreline, facility or community)* impact is expected.

/Cause of the incident will be investigated as soon as it is safe to do so/after the incident is over.

/ *(Company)* has started up an internal investigation into the cause of the incident and will fully cooperate in any investigation from the authorities.

(Company/relevant authorities) have *(describe response actions relevant to the public)*:

/blocked the following roads to all traffic except for emergency vehicles: *(list roads and recommended detours)*

/issued a temporary flight restriction to prevent any aircraft from flying within *(number)* feet altitude and a *(number)* mile/kilometre radius of the incident scene.

(Company) has established a hotline for *(the public, relatives, the media, claims, wildlife)* to *(describe purpose)*. This hotline will be open from *(hours)* to *(hours)* at *(area code & phone number)*.

(Company) sincerely regrets any difficulties related to this incident. Right now, the priorities are

/to limit any further impact to the health and wellbeing of personnel, responders and communities impacted,

/bringing the situation under control

/ *(and)* minimising any impact to the environment.

/For more information, please call (*hotline, area code & phone number*) or visit the website at (*URL*).

/For more information please contact: (*Name*), (*Company*) at (*area code & phone number*) (*Name*), or (*Company/external organisation*) at (*area code & phone number*)

(*Name*), (*Company/external organisation*) at (*area code & phone number*)

-end-

Appendix 3G: Template for a Final Press Release

FOR IMMEDIATE USE: (DATE)

(Location): The emergency response phase of the (incident) is over. The incident was successfully brought under control at (date and time) or less than (hours/days) after the incident began.

(List the cancellation of any recommendation to evacuate or shelter in place, safety zones or temporary flight restrictions, or roadblocks in the area.)

More than (number) personnel from (number) different authorities and organizations responded to the incident, including (list participating authorities and organizations).

(Insert quote from Company senior executive praising the organization for their quick response, professional expertise and continued support and cooperation during the incident.)

(If appropriate, insert quote from authority official evaluation Company's response.)

/Most importantly, the incident ended safely with no reports of any (serious) injuries or (major) off- site impact on the public or environment.

/Tragically, (number deaths/injuries) have been confirmed. (Company senior executive title and name) said "Each member of (Company) joins me in offering our sincere condolences and sympathy to their families, friends and co-workers. Our thoughts and prayers are with them."

(Company) has established a hot line for (the public, relatives, the media, claims) to (describe purpose). This hot line will remain open from (hours) to (hours) at (area code & phone number).

(Company) will continue to work together with (relevant authorities) to monitor final clean-up operations and to conduct a formal investigation into the cause of the incident.

/For more information, please call (area code & phone number) or visit our website at (URL).

/For more information please contact: (Name), (Company) at (area code & phone number)
(Name), (Company/external organisation) at (area code & phone number)

-end-

Appendix 3H: Guidance for Spokespeople

Before interviews take place, the spokesperson should be advised:

General

- Make sure you know all the facts about the interview:
 - o Publication/programme
 - o The contribution required:
 - background only
 - newsclip
 - live
 - panel guest
 - deadline/on air time
 - o who will do the interview
 - o whether it is live, recorded, by phone or down the line by radio car/TV
 - o who else is being interviewed
 - o if there are other contributors, whether you will be interviewed at the same time as them
- Make sure you know the latest on the situation and what you want to say (key messages) ahead of the interview.
- Know your objective and personalise your messages for the audience. Make your communication objective clear, simple and memorable. What is the purpose of the interview? What do you want readers/viewers/listeners to take away?
- Remember this is an opportunity for you to put your point across - not a conversation. Be clear what you want to say and don't be led by questions. Rebut a negative point, then bridge to one of your positive key messages.
- Know what you want to say and don't want to say. Don't be afraid to repeat your key messages. When possible, state your conclusion first. Then reinforce it with supporting statements or examples.
- Be succinct. Keep your messages to a few lines. This is especially important for TV and radio, which deal with small 'bites' of information. Newspaper and magazine quotes likewise are often brief: a few sentences at most.
- Always be helpful: be authoritative but do not be aggressive or defensive
- Be honest, frank and open. When communicating risk information, trust and credibility are the most precious assets.
- Provide praise where appropriate e.g. for emergency services. Never assume the interviewer is either well-informed or ill-informed. Do not speculate; stick to the facts
- Avoid technical jargon and 'company speak'. Technical language and jargon are barriers to successful communication.

- Correct any mistakes or assumptions made by the journalist.
- Do not place/accept blame, accuse anyone of negligence, discuss liability or otherwise prejudice the situation. Defer to the inquiry to follow: it will examine all possible causes
- If appropriate, acknowledge responsibility for undertaking/managing response, but do not accept or mention liability
- Do not release the names of injured/fatalities until next of kin have been informed
- Never use the term 'no comment'. Instead, bridge back to key messages. For example. 'we don't know the answer to that yet, but what's relevant right now is ...' or, 'Our priority is ...'
- If the reporter asks questions you can't answer because they are out of your area of expertise, it's OK to say "I don't know." Just make sure someone who can answer the question gets back to the reporter in time for his/her deadline.
- Don't speculate. Beware of hypothetical statements, and stick to your agenda.
- Remember, in a crisis there's no such thing as "Off the Record." If you don't want to be quoted or don't want the media to report it, don't say it!
- Anticipate questions. Work with the CMT to brainstorm potential questions and draft clear, concise answers.
- Speak with one voice. Make sure you and other company spokespersons are delivering consistent messages.

TV interviews

- Dress appropriately: avoid stripes, checks, bright colours.
- If sitting down, don't slump. Sit upright.
- Keep your hands down near your lap and away from your face.
- Keep your gaze aligned with the interviewer's eyes.
- Make eye contact. Talk to reporters, not cameras.
- If doing TV down-the-line, you must look directly at the centre of the camera.

Radio interviews

- Keep a constant distance from the microphone and sit still.
- Don't scribble or rattle jewellery. The microphone will amplify the sound.
- Maintain eye contact with the interviewer to read his/her body language.
- Don't rely on your notes. You might lose your place. Learn your three key points.

Print interviews

- Anything you say at any point may be quoted in any context.
- Keep your focus, however lengthy the conversation.

Interview briefing sheet

This should be completed by the interviewer for the BMM / Vedanta spokesperson before any interview:

Interview briefing sheet	
Programme/publication	
Date, time and venue of the interview	
Journalist	
Contribution required (background only, newsclip, live, panel guest)	
Type of interview (live, recorded, by phone or down the line by radio car/TV)	
Date and time of airing/publication date	
Background (key themes, etc.)	
Other interviewees (if any) and format	

Appendix 3I: Guidance for Press Conferences

Set up

1. Do not underestimate the numbers likely to attend; pick a large enough venue.
2. If possible, ensure the venue has adequate parking for TV and radio trucks, and that the venue can cater for journalists' requirements (e.g. telephone, email, fax facilities).
3. Late morning and early afternoon are the most convenient times for the media.
4. Ensure there is sufficient seating for all journalists attending, arranged facing the table with a central area left clear for TV camera lighting.
5. Ensure the venue has two separate entrances – one for you, one for the media.
6. Nominate a chairperson and seat no more than five people on the top table; too many looks crowded.
7. Ensure all panel members are briefed on the key messages and are prepared for difficult questions.
8. Ensure there is a PA system and a microphone for each speaker and, if appropriate, the crisis communications representative managing the conference.
9. Check the background for the table – it should be plain.
10. Ensure there is also a desk and chair for a minute taker.
11. Place a refreshment area at the back of the room for journalists.

Holding the press conference

1. The crisis communications representative should be at the venue at least an hour the start before to check facilities and welcome journalists.
2. Provide a signing in book so you have a record of who has attended.
3. Journalists' credentials should be checked before they enter the venue. Only allow the media in.
4. Begin on time: the chairperson or crisis communications representative should briefly welcome the journalists, outline the agenda (statement then 20 minutes of questions), and introduce the panel.
5. The chairperson should then outline what has happened, expressing the 3Cs (see Appendix 3A). This should take approximately 10 minutes.

Appendix 3J: Template for a Press Conference Statement

Ladies and gentlemen,

Thank you for attending this *morning's* / *afternoon's* press conference

My name is *(name and role)*

I would like to introduce you to *(name)* who is *(title)*. The format for this *morning's* / *afternoon's* press conference will be:

A brief statement by *(name)*, followed by a question period. We also have a media release available.

[STATEMENT, FOLLOWED BY QUESTIONS AND ANSWERS]

We have time for one final question.

Thank you for your attendance.

APPENDIX 4: TEMPLATES & TOOLS

Appendix 4A: Stakeholder Identification & Engagement Plan Template

STAKEHOLDER	RELEVANT (Y, N)	OBJECTIVES WHY ENGAGE?	STRATEGY PROACTIVE OR REACTIVE	PRIORITY (H,M,L)	FORMAT OF ENGAGEMENT (FACE TO FACE, EMAIL ETC.)	BY WHO M, WHEN AND WHERE	MESSAGE DETAIL
INTERNAL							
Corporate - Level 3							
Employees							
Next-of-kin							
Joint Venture Partners							
Contractors							
Suppliers							
Department – Level 2							
Employees							
Next-of-kin							
Joint Venture Partners							
Contractors							
Suppliers							
Asset/Operation – Level 1							
Employees							
Next-of-kin							
Joint Venture Partners							
Contractors							
Suppliers							
EXTERNAL							
Government							
Ministers							
Government representative							
Local government representative (Mayor, Councillors)							
Government departments							
Provincial regulators							
National regulators							

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STAKEHOLDER	RELEVANT (Y, N)	OBJECTIVES WHY ENGAGE?	STRATEGY PROACTIVE OR REACTIVE	PRIORITY (H,M,L)	FORMAT OF ENGAGEMENT (FACE TO FACE, EMAIL ETC.)	BY WHO M, WHEN AND WHERE	MESSAGE DETAIL
Industry							
Industry bodies							
Hospitals							
State emergency services (e.g. police, ambulance etc.)							
Mines rescue service							
Industry environment group (e.g. EPA)							
Other							
Media							
Customers							
Investors							
Local residents/ neighbours							
Environmental groups							
Unions							
Non-Government Organisations							
Insurers							
Other interest/community groups							
Allies/ Opponents							

Appendix 4B: Stakeholder Communication Control Sheet

Date & time	Media outlet/ stakeholder group	Contact name / Number	Who makes contact	By what means	Summary of communication activities	Action required	Action complete (✓) & initial	Follow-up actions required
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	
							☐	

Appendix 4C: Individual Action “To Do” List

NAME:		DATE:
TIME	ACTION/EVENT “TO DO”	ACTION COMPLETED
		☐
		☐
		☐
		☐
		☐
		☐
		☐

Appendix 4D: Situation Board

SITUATION BOARD						
Time:	Next Briefing Time:					
Location of incident:	Objectives:					
	1.					
	2.					
Description of incident:	1.					
	2.					
	3.					
INFORMATION REQUIREMENTS/ TASKS	RESOURCE REQUIRED	SOURCE	RESPONSIBLE	STATUS	DUE	TIME COMPLETED

Appendix 4E: Injuries & Fatalities Control Sheet

NEXT OF KIN NAME	RELATED TO NAME	NEXT OF KIN TELEPHONE NUMBER	ADDRESS	CURRENT LOCATION	NEXT OF KIN SUPPORT REQUIRED	COMMENTS

Appendix 4F: Next of Kin (NOK) Communication Control Sheet

NAME	ORGINIZATIO N	CONDITION	VERIFIED (Y/N)	CURRENT LOCATION	POLICE ADVISED (Y/N)	NOK NOTIFIED (Y/N)	NOK SUPPORT	COMMENT S

Appendix 4G: Death Notification Guidelines

NEXT-OF-KIN DEATH NOTIFICATION

IN SOME COUNTRIES, NOTIFICATION OF DEATH CAN ONLY BE DONE BY POLICE. ARRANGE TO VISIT WITH THE POLICE OR IF DENIED, ARRANGE FOR A FACE-TO-FACE VISIT AFTER THE POLICE HAVE COMPLETED THE NOTIFICATION OF DEATH. ENSURE LOCAL REGULATORY COMPLIANCE. FOLLOW LOCAL CULTURAL AND RELIGIOUS OBSERVANCES.

Following up notification by police

- Gather as much information as possible about the incident
- Arrange for two people to make the visit
- Be certain that the police have made the notification
- Make the visit in person (where possible)
- Take separate vehicles if possible (one notifier may have to provide transportation while the other remains with family members)
- Identify yourself and ask to come into the house
- Be certain you are talking to the correct person
- Plan to stay long enough to provide information, support and direction.

Making the visit

- If next-of-kin speak another language, take an interpreter and be aware of cultural and religious observances
- Provide human presence and compassion
- Speak slowly and carefully; give any other details that are available
- Reassure them that an on-site investigation is underway to determine underlying causes and to develop the necessary actions to prevent recurrence
- Demonstrate care and concern – stay calm, listen carefully and talk through their concerns
- Answer questions calmly; write down any questions you can't answer and arrange to get them answered promptly
- Say, "I'm sorry this happened"
- Accept the emotions of the person you are notifying and your own
- Provide assistance or seek medical help if the person suffers from a shock reaction
- Offer to call a friend or family member who could come and offer support
- Offer to contact others who must be notified and write down the names of everyone you called
- Help the next-of-kin take the necessary steps
- Advice that counselling is available.

After making the notification

- Inform deceased employee's supervisor of contact made
- Oversee that regular contact is maintained with next-of-kin
- Confirm that support offered to next-of-kin has been delivered.

Appendix 4H: Business Continuity Analysis

BUSINESS CONTINUITY ANALYSIS		
CURRENT BUSINESS IMPACTS		
Date:		Time:
ISSUE	CONSEQUENCES	COMMENTS

POTENTIAL BUSINESS IMPACTS		
ISSUE	CONSEQUENCES	COMMENTS

Appendix 4I: Chronological Sequence of Events & Action Log Sheet

CHRONOLOGICAL SEQUENCE OF EVENTS AND INSTRUCTIONS		
DATE AND TIME	EVENT/INSTRUCTION	COMMENTS

Appendix 4J: Telephone Message Sheet

TELEPHONE MESSAGE SHEET		
MESSAGE TAKEN BY:		
CALLER'S NAME:		
CALLER'S ORGANISATION:	DATE:	TIME CALLED:
CALLER'S TELEPHONE NUMBER (1):	CALLER'S TELEPHONE NUMBER (2):	
CALLER'S FAX NUMBER:	CALLERS EMAIL ADDRESS:	
MESSAGE DETAILS:		
MESSAGE/NOTES:	ACTION REQUIRED:	DEADLINE:
FOR HANDLING BY: ☐ _____		

Appendix 4K: Telephone Message Log Sheet

Telephone Message Control Log							
Date	Time of call	Message From	Message To	Priority H/M/L	Call Returned Yes/No	Time of Return Call	Comments

Appendix 4L: Guideline for establishing a Media Briefing Room

GUIDELINES FOR ESTABLISHING A MEDIA BRIEFING ROOM	
EQUIPMENT/REQUIREMENTS	✓
At least two dedicated phone lines	
Sufficient desks/seating for spokespeople, journalists, camera operators and sound/microphone technicians	
Large desk at the front of the room, where spokespeople would be seated (to enable radio media to prop up their microphones if necessary)	
Stationery	
TV, DVD player or projector with screen, particularly if the spokesperson wishes to show video footage or other graphic material. Extension cords should also be available	
Copies of Vedanta's Corporate information/media kits	
Avoid any company logo or signage in the room	
Small tape recorder and tape (may be useful to tape media conferences, for BMM's records)	
Tea and coffee-making facilities (or close access to these)	
Close proximity to amenities such as bathrooms, to avoid media walking extensively through the offices or locations where confidential information can be accessed or overheard.	

Appendix 4M: Guideline for establishing a Next of Kin Room

GUIDELIENES FOR NEXT OF KIN ROOMS	
NEXT-OF-KIN ROOM EQUIPMENT/REQUIREMENTS	✓
A quiet room away from traffic and the media	
Not visible to the media and are not within earshot of conversations from staff or senior management	
Close to amenities such as bathrooms	
At least one dedicated phone line	
Sufficient and comfortable seating	
Tissues	
Computer (laptops) with internet and email access and a printer	
Stationery	
TV, radio and current newspapers	
List of appropriate Black Mountain contacts	
Tea and coffee-making facilities (or close access to these)	
Access to a counsellor	
Regular updates (in-person) on the situation and what information is being released to the media	

APPENDIX 5: KEY STAKEHOLDER CONTACT DIRECTORY

KEY STAKEHOLDER CONTACTS			
SERVICE	ORGANISATION NAME	CONTACT PERSON	MOBILE / TEL
Medical Services			
Paramedic Services	BMM Paramedics		
Ambulance Services	BMM Ambulance		
	SA Paramedics		
	Springbok Hospital		
Clinic	BMM Clinic		
	Aggeneys State Clinic		
Hospitals (Provincial)	Springbok Hospital		
	Hospital		
Hospitals (Private)	Hospital		
	Hospital		
Tele Communications			
Telecommunication	TELKOM		
	MTN		
	Vodacom		
Media			
Radio Stations			
Mines Rescue Services			
MRS Welkom Office	Rescue Manager		
Region Police Services			
Police and Traffic Control	Aggeneys Police		
	Springbok Police		
	Pofadder Police		
Department of Mineral Resources (DMR)			
Mine Inspectors	Principal Inspector of Mines – Northern Cape		
	Normal hours		

KEY STAKEHOLDER CONTACTS			
SERVICE	ORGANISATION NAME	CONTACT PERSON	MOBILE / TEL
	After Hours		
Chamber of Mines			
Chamber of Mines	Switchboard		
	Chief Executive		
Environmental Management Agency			
Environmental Inspectors	Environmental Services –Head Office		
Environmental Spill Response	Environmental Services –Regional Office		
Fire Fighting			
Fire Fighting	BMM Fire Team	Deeps Control Room	
	Springbok Fire Station		
	Pofadder Fire Station		
Power Supply			
Power Supply	ESCOM	Control Room	
Unions			
Support	NUM National Secretary		
	NUM General Secretary		