

Environmental Management Strategy

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Document Control

Rev	Description	Prepared By	Approved By	Date
0	Document Creation	J Burton	S. Martin	6/5/2025
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1	EMS updated to include the Constellation Project	J Burton	W. Olson	12/02/2026
1.1	EMS updated to address minor comments from DPHI relating to alignment with the TCM Development Consent. Changes made to: -Section 1.2 (and Table 1) -Section 5.8 (including Table 5) -Section 6.5.3.1 -Section 6.1 (Table 6)	J Burton	W. Olson	23/04/2026
1.1	Approved by a nominee of the Planning Secretary.			28/4/26

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Appendices

Appendix A Aeris Resources Sustainability Policy Statement (currency 1 June 2023)

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1. INTRODUCTION

Aeris Resources (ASX: AIS) is an established copper mining and exploration company listed on the Australian Securities Exchange.

Tritton Resources Limited (TRL), a wholly owned subsidiary of Aeris Resources Limited (ARL) operates the:

- Tritton Copper Mine (TCM) (Mining Lease (ML) 1544);
- Girilambone Copper Mine complex including the Murrawombie Copper Mine (MCM) (ML1280), North East Copper Mine (NECM) (ML1383) and the Avoca Tank Project (ATP) (ML1818); and the
- Constellation Project (CP).

For the purpose of this Environmental Management Strategy, the five mines are collectively referred to as 'Tritton Copper Operations.'

Tritton Copper Operations are a local, community-focused mining operation, with 82% of employees and their families living in the local area. Employing people from the local area is important to Aeris Resources and as a major local employer, TRL plays a key role in supporting the local population.

Wherever possible the company endeavours to engage local service providers to support mining and exploration activities. This is consistent with Aeris' Community and Heritage Policy, whereby the company seeks to be an active participant in the economic and social wellbeing of the communities in which they operate, commensurate with the economic opportunities particular to each location.

TRL has a preference of employing locally, and training people in the various skills required to become an integral member of a mine workforce and is an active member of the local community, investing in education and career pathways for local residents and supporting a range of local organisations. The company injects around \$21 million into the local economy in salary and wages alone.

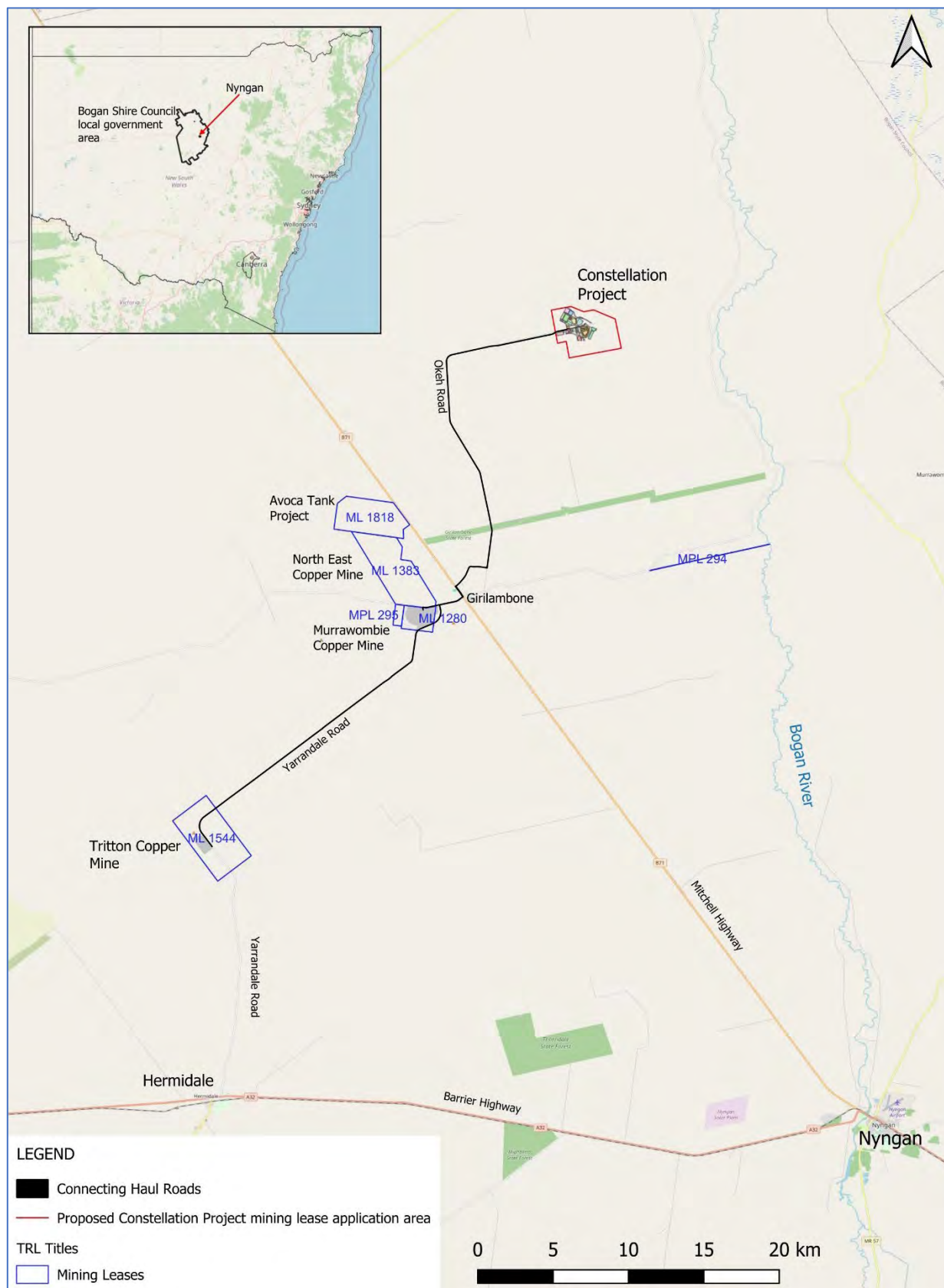
The company fosters good working relationships with all government departments that it has interactions with, from local shires through to federal government administrative bodies; this has helped the company form strong working relationships with local people in all areas where it operates and this in turn has assisted in the growth of the company.

The Mines are located west and north-west of Nyngan, in the Bogan Shire Council Local Government Area (LGA) within the central west region of New South Wales. The location of the five mining operations is provided in Figure 1

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Figure 1 Site Locality



1.1. Company / Site Background

1.1.1. Tritton Copper Mine

The mineralisation at the Tritton Copper Mine (TCM) was discovered in 1995 and following a series of preliminary assessments and preparation of an Environmental Impact Statement, Development Application (DA) 41/98 was approved on 1 September 1999 by the Minister for Planning and Urban Affairs. Mining operations under DA 41/98 are approved until 31 December 2036. Mining Lease (ML) 1544 was granted by the former Department of Mineral Resources on 22 December 2003. DA 41/98 has been modified nine times, with the most recent modification approved on 11 September 2025. Figure 2 presents the approved TCM site layout.

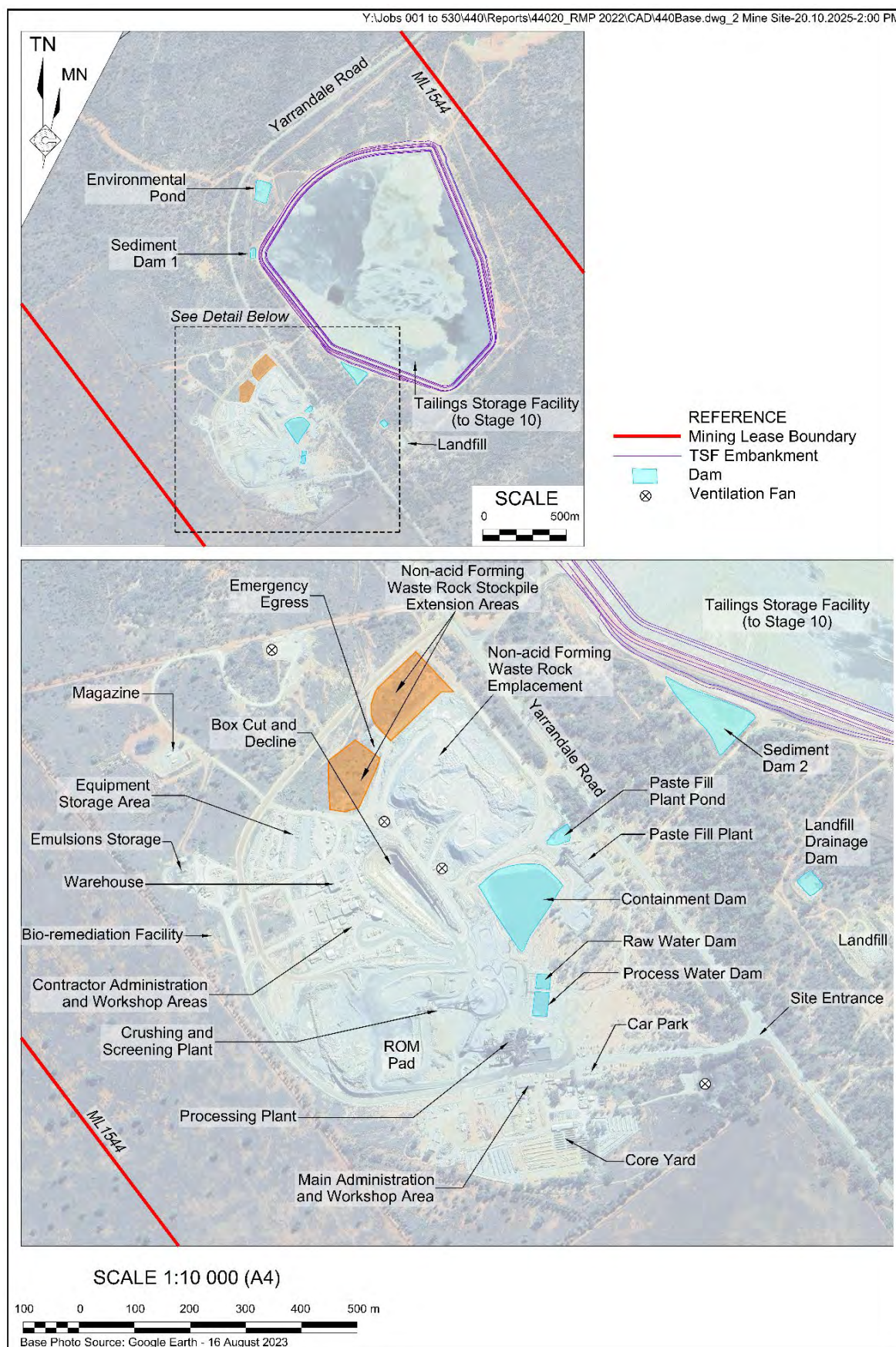
A summary of the approved activities at the Mine are provided as follows.

- Extraction of a total of approximately 12.83Mt of copper ore using underground mining techniques.
- Importation of no more than 1.8Mt of mined material (ore and waste materials) from all mines within the Tritton Copper Operations in a calendar year.
- Construction and use of a Non-acid Forming Waste Rock Emplacement to a maximum height of 30m above the natural surface or approximately 301.5m AHD and a disturbance footprint of 8.5ha.
- Processing of site-generated and imported ore to produce a copper concentrate.
- Construction and use of a Tailings Storage Facility to an embankment height of 278m AHD and a disturbance footprint of 158.5ha.
- Export of no more than 30,000 tonnes of waste rock from the TCM in a calendar year, generally for the purposes of local road construction and maintenance.
- Transportation of the copper concentrate in shipping containers to the Hermidale rail siding, located approximately 19km to the south of the TCM, and transportation of that material by train to port for export.
- Export of up to 0.5Mtpa of tailings for paste fill operations at all other mines within the Tritton Copper Operations in a calendar year
- Operation of a waste landfill facility and the receipt of wastes from all other mines within the Tritton Copper Operations.

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Figure 2 Tritton Copper Mine layout



1.1.2. Murrawombie Copper Mine

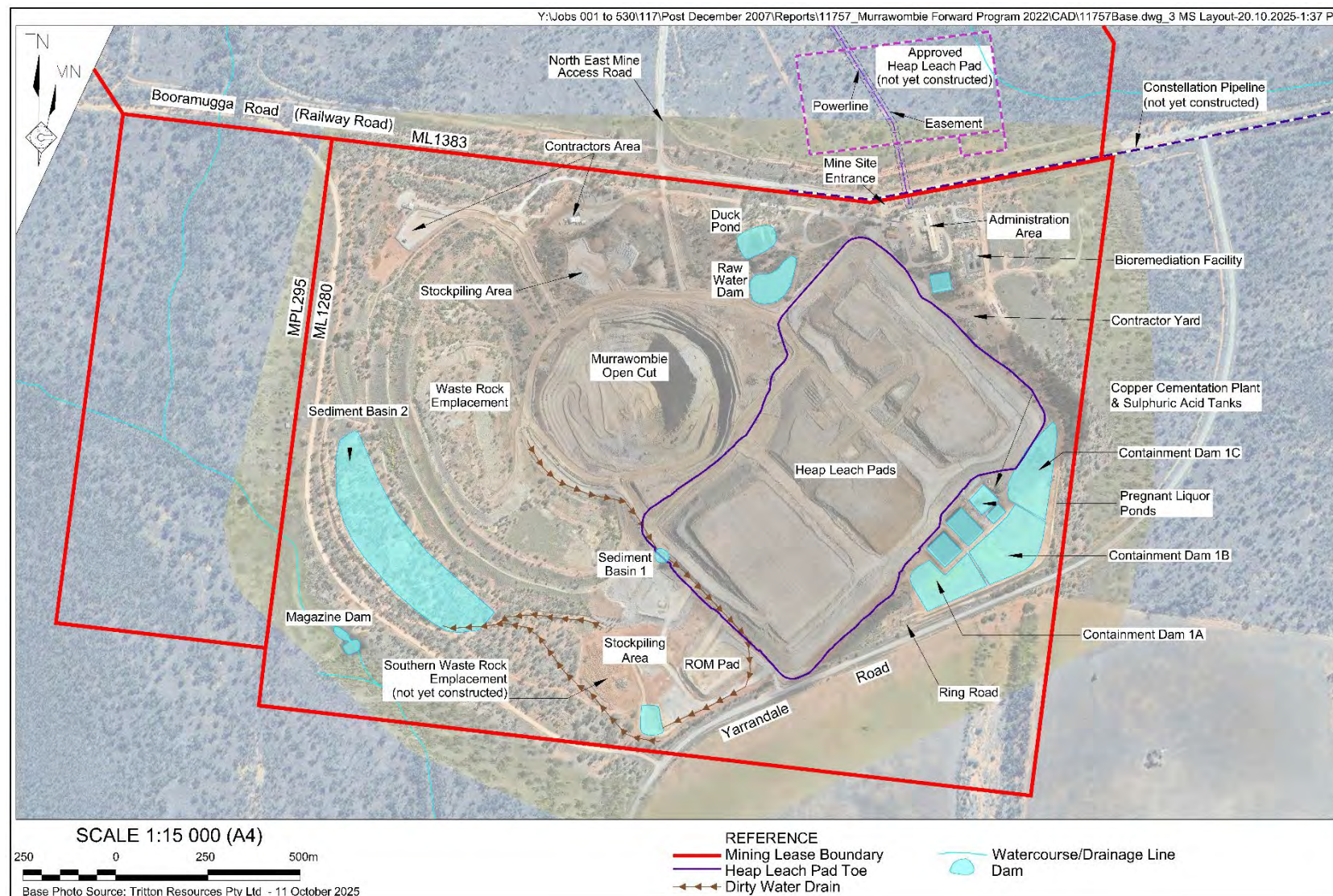
The operation of the existing Murrawombie Copper Mine (MCM) is approved under Development Application (DA) 1/91. DA 1/91 was issued by Bogan Shire Council, under the Environmental Planning and Assessment Act 1979 (EP&A Act), on 25 March 1991 to permit mining of copper ore by open cut mining methods with the resulting material to be processed on site using conventional heap leach, solvent extraction and electrowinning methodologies. Since that time, DA 1/91 has been modified five times, with the most recent being Modification 5, approved on 4 July 2024 (DA 2015/010/4). Figure 3 presents the approved MCM site layout.

In summary, approved activities at the MCM include the following.

- Mining using open cut and underground methods in accordance with the approved layout.
- Operation of the MCM on a 24-hour, 7 day per week basis.
- Construction of a waste rock emplacement to the west of the Murrawombie Open Cut.
- Construction of a flotation plant (not constructed).
- Construction and operation of four Heap Leach Pads to the east and northeast of the Murrawombie Open Cut, three of which have been constructed. Operation of the constructed heap leach facilities has ceased and rehabilitation of the majority of the facility has commenced.
- Operation of a copper cementation plant for the recovery of copper.
- Expansion of the Murrawombie open pit (approved under Modification 3)
- Transportation of up to 1Mtpa of copper ore to the TCM for processing.
- Construction and use of ancillary infrastructure including a mobile concrete Batching Plant.

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Figure 3 Murrawombie Copper Mine layout



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1.1.3. North East Copper Mine

The North East Copper Mine (NECM) is located approximately 6km northwest of the village of Girilambone and operates under Development Application (DA) 6/95 and Mining Lease (ML) 1383 and commenced operations in 1996. The development consent was issued by Bogan Shire Council and does not contain an expiry date.

Open cut mining at the NECM ceased in 1997. During the extraction period, three open pits were mined (Larsen's pit, Northeast pit and Hartman's pit) until copper oxide ore were exhausted in the upper part of the ore body. To process the oxide ore, the extracted ore was transported to the nearby MCM, crushed and placed on heap leach pads where the contained copper was leached using sulphuric acid and recovered using solvent extraction/electrowinning.

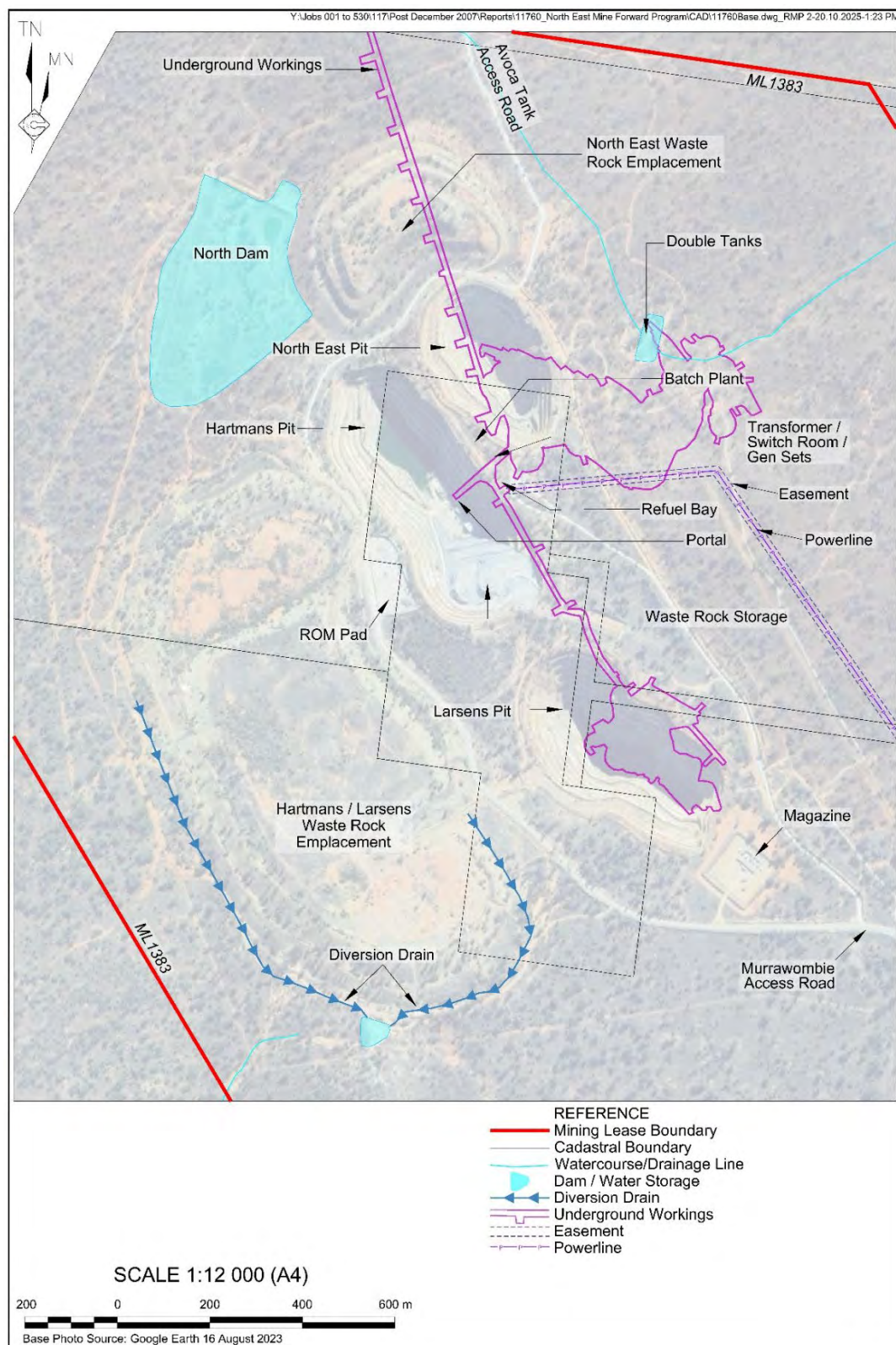
From 2007, mining was undertaken by underground extraction methods with mined ore transported to the TCM for processing. This continued until August 2016, before operations were suspended and the NECM was placed in care and maintenance. The north-eastern wall of the Hartman's pit contains a boxcut portal and is used for access to the Avoca Tank Project which is located to the north of the NECM complex. Other NECM infrastructure is utilised for the Avoca Tank Project including ROM pad, Waste Rock Emplacement (within the Hartman's Pit) and ancillary infrastructure including roads, power and water.

Figure 4 presents the approved NECM site layout.

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Figure 4 North East Copper Mine layout



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1.1.4. Avoca Tank Project

The Avoca Tank Project (ATP) is located approximately 2km north of the NECM and 24km northeast of the TCM and operates under DA 10/2015/004/003. DA 2015/004 was granted in September 2016 and has been modified twice since its original approval (Mod 2 approved 15 May 2025). Access to the ATP is through an underground drive accessed via the Hartmans pit at the NECM. Existing infrastructure on the adjacent NECM is used for the ATP, including the existing run-of-mine (ROM) pad and waste rock emplacement (WRE). Other surface infrastructure associated with the ATP includes ventilation fans and an emergency egress. Ore extracted from the ATP is transported and processed at the nearby TCM. Figure 5 presents the approved ATP site layout.

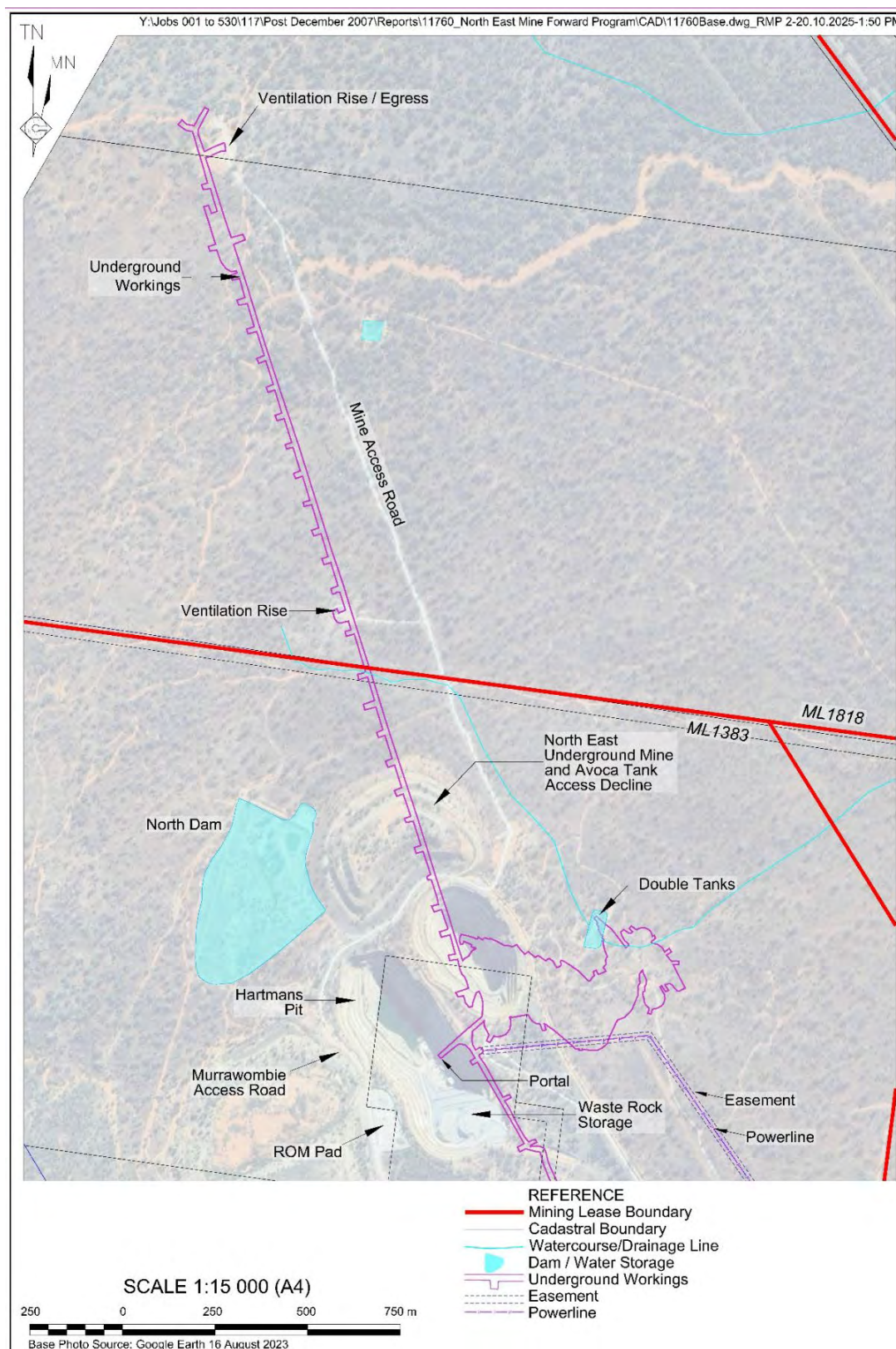
Collectively, the North East Copper Mine and Avoca Tank Project are also referred to as North East Mine (NEM)

In summary, approved activities at the ATP include the following.

- Use of a portal (within Hartman's Pit), construction of a decline, underground workings and three vent rises (one equipped as an emergency egress and the others with a ventilation fan at surface).
- Extraction of the economically recoverable copper-gold-silver resources to a depth of approximately 500m below surface using long hole open stope mining techniques with some backfill.
- Transportation of ore material to the TCM for processing using road registered road trains via a combination of a private haul road and Booramugga and Yarrandale Roads.
- Establishment of a surface waste rock emplacement within Hartman's Pit for storage of waste rock extracted during the construction of access drives and mine development. Waste rock is being used to stabilise a landslip on the southern rim of the Hartman's Pit and is also re-used underground as a backfill component.
- Extension of infrastructure from the NECM, including a site access road, water pipeline and transmission line.
- Establishment of ancillary infrastructure.

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Figure 5 Avoca Tank Project layout



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1.1.5. Constellation Project

The Constellation Project (CP) is located in the 'Bogan Shire' local government area (LGA) of central-western New South Wales. The Project site is located approximately 20 km north-east of the township of Girilambone and approximately 55 km north-west of Nyngan. The Project was approved as a State Significant Development (SSD-41579871) by the NSW Department of Planning, Housing and Infrastructure on 24 December 2025.

The Project includes the mining of copper ore, through the development of an open cut pit and underground mine. Mined ore is transported via road to the Tritton processing plant for processing, with lower grade oxide ore processed by heap leaching at the Project site. Transport of dewatered tailings material from Tritton Mine (back to the Project site for use in cemented paste fill) will support the underground mining activities.

The Project mines an average of 500,000 tonnes of copper ore per annum with peak production volumes of up to 1Mtpa. The mine life is approximately 16 years, inclusive of a Project construction period and rehabilitation/closure period. There is potential for mine life extensions as the deposit is developed down plunge.

Supporting infrastructure for the proposed Project includes:

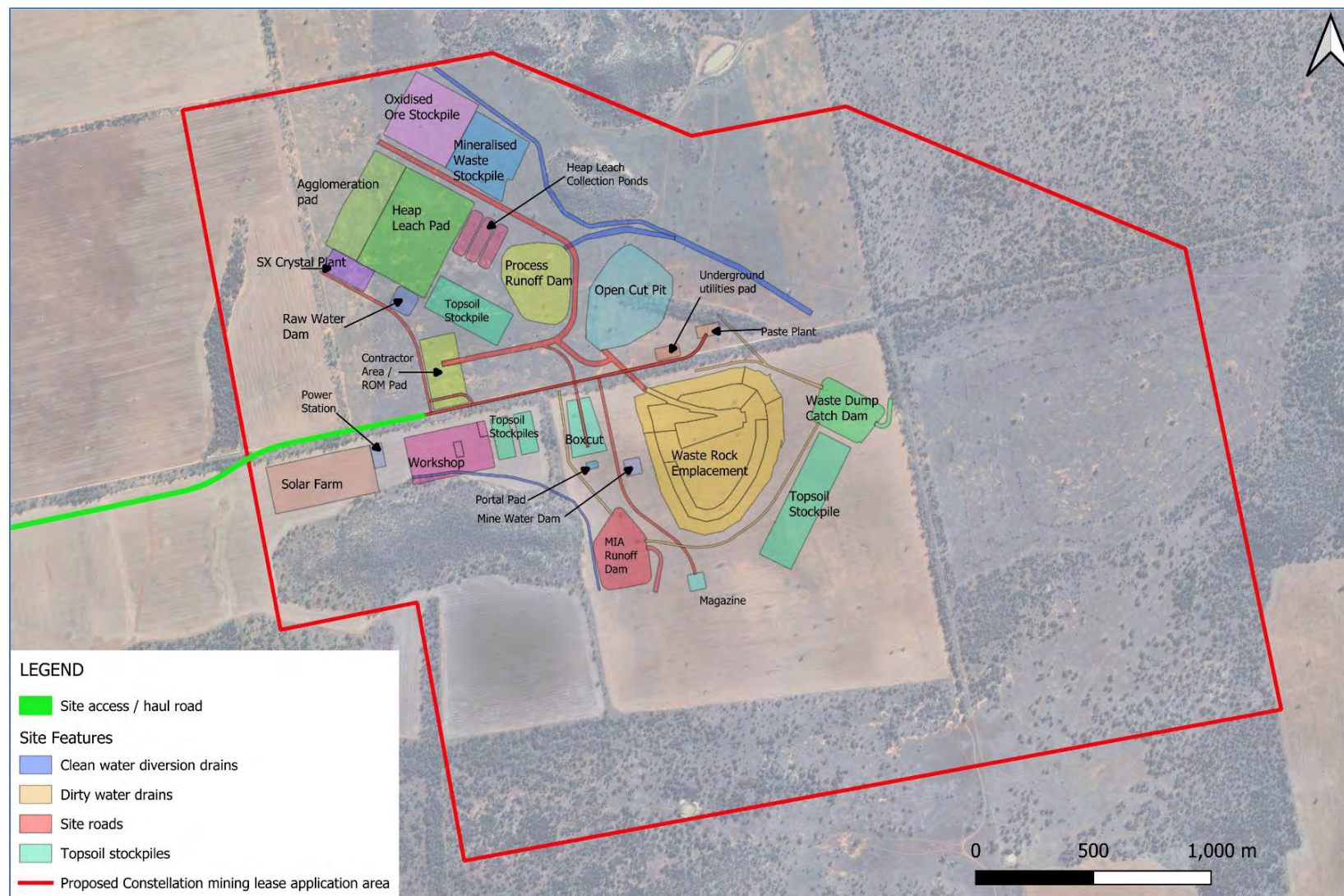
- a road upgrade between the Project site and the Mitchell Highway (to support haulage activity);
- a new T intersection to link the proposed haul road with the eastern side of the Mitchell Hwy (north of Girilambone);
- an upgrade to the intersection of the Mitchell Highway with Railway Road (west of Girilambone);
- a waste rock emplacement at the Project site;
- a run of mine stockpile to support the handling of mined ore;
- a mine laydown area and workshop;
- a heap leach pad and associated processing facility;
- a paste plant, emulsion storage and shotcrete batch plant;
- topsoil stockpiles;
- a solar farm and on-site power station;
- water management and storage infrastructure, including a bi-directional water pipeline between the Project site and Murrawombie Copper Mine; and
- administrative facilities including offices, amenities, and car park.

Figure 6 presents the approved Constellation Project site layout and Figure 7 shows the approved haul road route / infrastructure corridor from the project site to Murrawombie and Tritton Copper Mines.

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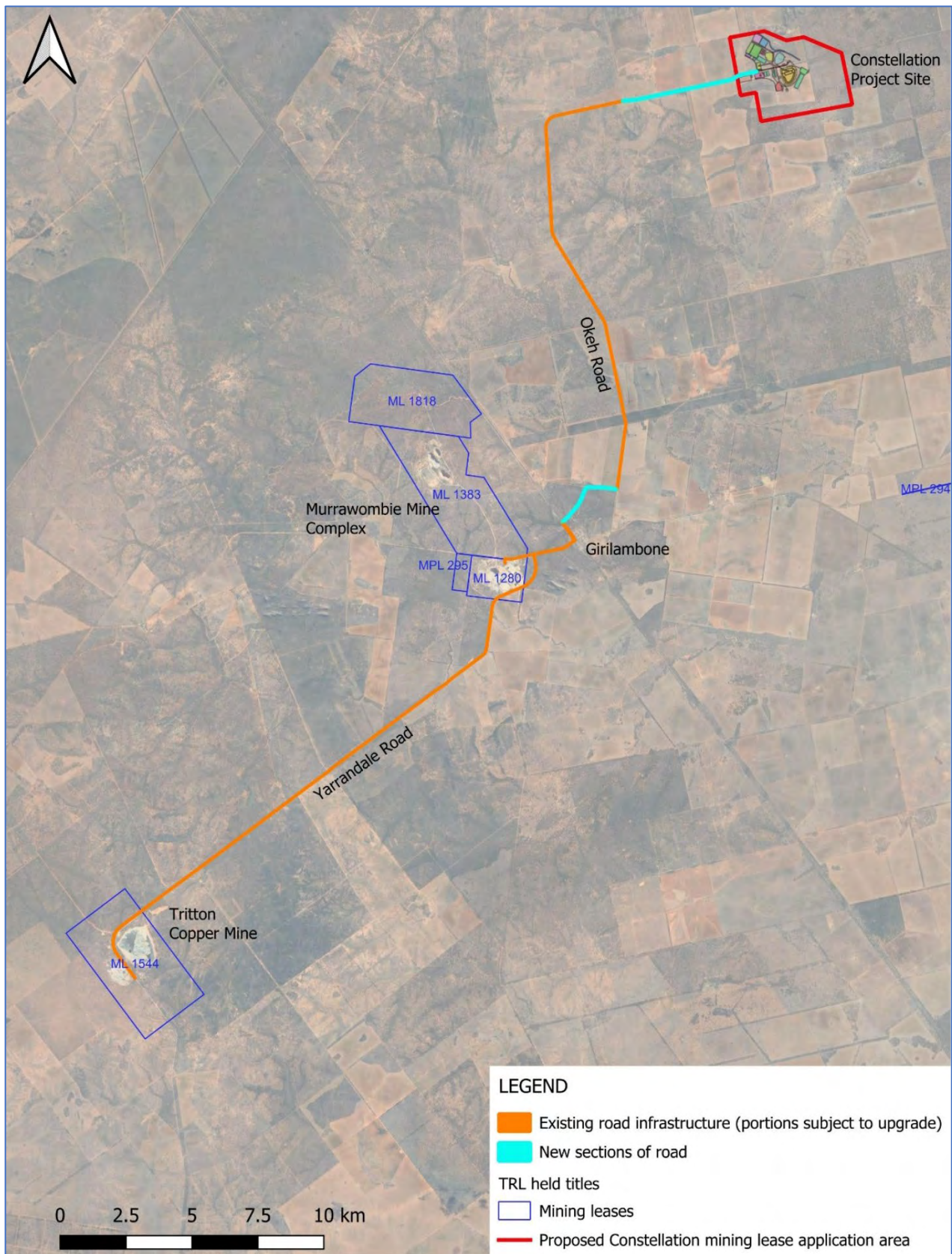
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Figure 6 Constellation site Layout



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Figure 7 Constellation haul road / infrastructure corridor



1.2. Purpose and Scope

The purpose of this Environmental Management Strategy (EMS) is to outline TRL's approach to managing environmental impacts associated with its 'Tritton Copper Operations'. The EMS applies to all activities conducted by TRL, including acts or omissions by its employees, contractors, and visitors.

The key objectives of this EMS are to:

- provide a framework for environmental management including continual improvement in environmental performance;
- ensure compliance with all relevant environmental legislation, regulations, and approvals;
- ensure alignment with any commitments and limits as described in project environmental assessments including Environmental Impact Statements, Statements of Environmental Effects, response to submissions, amendment reports and associated consultation outcomes;
- identify, assess, and manage environmental risks and potential impacts to:
 - o the environment;
 - o sensitive receivers;
 - o the wider community; and
 - o other stakeholders.
- set and achieve meaningful environmental objectives and targets;
- define clear roles and responsibilities for environmental management;
- foster a culture of environmental stewardship among all employees and stakeholders; and
- demonstrate our commitment to environmental protection to regulators, community, and other stakeholders.

This EMS covers all operational phases including:

- Exploration;
- Construction;
- Operations; and
- Decommissioning and rehabilitation¹.

In addition to the above objectives, this EMS meets the following development consent requirements:

- Condition 6, Schedule 2 of the TCM Development Consent (DA41/98) (Modification 9) (replicated in Table 1) requiring the development of an Environmental Management Plan;
- Condition C1 of ATP Development Consent (DA 10/2015/004/003) (replicated in Table 2) requiring the development of an Environmental Management Strategy; and

¹ Note: This EMS provides the overall framework for environmental management, including for rehabilitation. A separate Rehabilitation Strategy has been developed that addresses specific rehabilitation requirements and outcomes. The Rehabilitation Strategy nonetheless remains part of the EMS framework.

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- Condition B1 of the Constellation Project Development Consent (SSD-41579871) (replicated in Table 3) requiring the development of an Environmental Management Strategy.

Table 1 Tritton - Environmental Management Strategy Requirements

Condition 6, Schedule 2 of TCM Development Consent (DA41/98)	Relevant EMS Section
1. The Applicant must carry out the development: (i) generally in accordance with the EIS; (ii) in accordance with the conditions of this consent; (iii) generally in accordance with the development layout; and (iv) in accordance with all written directions of the Secretary.	Section 1.2
6. The Applicant must prepare an Environmental Management Plan (EMP) for the mining operations, which must include, the preparation of the following	This document
(ii) a Contingency Strategy prepared in consultation with CHPR for any threatened species that maybe affected by the construction and operation of the mine;	*Section 5.8
(iii) a Traffic Management Strategy prepared in consultation with TfNSW and Council, including a Driver's Code of Conduct;	*Section 5.8
(iv) a Noise and Vibration Management Strategy in consultation with the EPA, including noise management procedures, monitoring protocols and measures to ensure compliance with the noise criteria and operating conditions in this consent; and	*Section 5.8
(v) a Dust Management Strategy for the development, prepared in consultation with the EPA. The strategy must describe the air quality management system in detail and describe the measures that would be implemented to ensure compliance with condition 48 of schedule 2 of this consent.	*Section 5.8
The Plan must also include but not be limited to:	-
(vi) details of the mine infrastructure and facilities to be developed;	Section 1.1
(vii) where relevant, monitoring procedures relating to water quality, groundwater flows, air quality, noise and vibration, and the tailings storage facility;	Section 6.1
(viii) management and protection measures for all recorded Aboriginal archaeological sites within the development site;	*Section 5.8
(ix) the recommendations of the Preliminary Hazard Analysis prepared by McCracken Consulting, dated December 1998;	*Section 5.8
(x) management measures for any fauna and flora species listed under the Threatened Species Conservation Act 1995 that occur on the site.	*Section 5.8
The EMP must be prepared to the satisfaction of the Secretary in consultation with relevant agencies and must be submitted at least 1 (one) month prior to the commencement of construction, or within such period as otherwise agreed to by the Secretary.	Refer to document control summary for approval status.
*The range of management plans is described in Section 5.8 refer to the relevant management plans for specific content.	

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Table 2 Avoca Tank Project - Environmental Management Strategy Requirements

Condition C1 of ATP Development Consent (DA 10/2015/004/003)	Relevant EMS Section
C1 The applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Bogan Shire Council. This Strategy must:	This document
a) be submitted to the Bogan Shire Council for approval prior to the commencement of any construction works;	Section 1.2.1
b) be prepared by a suitably qualified and experienced expert;	Section 1.2
c) provide the strategic framework for environmental management of the development;	Section 2
d) identify the statutory approvals that apply to the development;	Section 3
e) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 5.1
f) describe the procedures that would be implemented to:	-
i. Keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Section 5.11.2 Section 5.11.4
ii. Receive, handle respond to, and record complaints;	Section 6.7
iii. Resolve any disputes that may arise;	Section 6.7.1
iv. Respond to any non-compliances	Section 6.3
v. Respond to any emergencies and	Section 5.10
g) include the following environmental management plans	
i. Aboriginal Heritage Management Plan	*Section 5.8
ii. Historic Heritage Management Plan	*Section 5.8
iii. Hydrocarbon Management Plan	*Section 5.8
iv. Soil and Water Management Plan	*Section 5.8
v. Pest Animal Management Plan	*Section 5.8
vi. Weed Management Plan	*Section 5.8
vii. Fauna Management Plan	*Section 5.8
viii. Water Management Plan	*Section 5.8
ix. Bush Fire Management Plan	*Section 5.8
* The range of management plans is described in Section 5.8 refer to the relevant management plans for specific content.	

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Table 3 Constellation Project - Environmental Management Strategy Requirements

Condition B1 of the Constellation Project Development Consent (SSD-41579871)	Relevant EMS Section
B1. An environmental management strategy must be prepared for the development. The strategy must:	This document
(a) be submitted for approval to the Planning Secretary prior to the commencement of construction;	Section 1.2.1
(b) describe the environmental management context and outline the scope of the plan, including:	-
(i) the relationship of the plan to other environmental management documents;	Section 2 Section 5.8
(ii) relevant statutory criteria, performance measures or operational requirements including conditions of consent and other legislative or regulatory licences, guidelines, policies or standards;	Section 3
(iii) sensitive receivers;	Section 5.8
(iv) consideration of the consultation outcomes from the EIS or other environmental management documents required by this consent; and	Section 1.2
(v) detailed plans of the site location and development, sensitive receivers and environmental monitoring locations;	Section 6.1
(c) list the role and responsibility of all key personnel and contractors involved in the environmental management of the development;	Section 5.1
(d) include an environmental risk assessment of the development and specific risk management controls and mitigations to:	Section 5.2
(i) comply with statutory requirements, limits or performance measures and criteria;	Section 3
(ii) manage the predicted impacts and risks identified in the EIS; and	Section 5
(iii) manage any other environmental impact or risk that has been identified after the EIS was submitted;	Section 5
Note: <i>Environmental risk assessment cannot be used to identify and assess physical changes to the development or an increase in impacts that are not described and assessed in the EIS. These may require a new planning approval and may need to be referred to the Department.</i>	Noted
(e) include processes to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks are effective;	Section 5.2
(f) include an adaptive management process that would be implemented if the risk assessment review identifies measures that are not effective in managing the identified risk(s);	Section 7.1
(g) include a clear plan depicting all the monitoring to be carried out under the conditions of this consent;	Section 6.1

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Condition B1 of the Constellation Project Development Consent (SSD-41579871)	Relevant EMS Section
(h) describe the training and/or awareness programs that would be carried out for all personnel involved in the development to ensure they understand and can effectively implement the plan; and	Section 5.3
(i) include procedures to:	-
(i) address the findings of any audit undertaken for the development; and	Section 6.5.3
(ii) respond to any non-compliance and/or incident.	Section 6.2 Section 6.3
B2. The development must not commence until the environmental management strategy is approved by the Planning Secretary.	Section 1.2
B3. The environmental management strategy, as approved by the Planning Secretary, must be implemented for the development.	Section 1.2

This EMS has been prepared by the TRL Environmental Superintendent and internally approved via the TRL 'Delegation of Authority' framework. Specialist external support has been sought and incorporated where required.

As related to the TCM, TRL will carry out the development in general accordance with:

- The TCM EIS (including modification assessment reports);
- with the conditions of this consent (replicated in Table 1 as relevant to this EMS);
- the development layout (Appendix 1 of the TCM Development Consent (DA 41/98)); and
- all written directions of the Secretary.

TRL will not commence the Constellation Project development until the EMS has been approved by DPHI; once approved, TRL will implement the EMS.

1.2.1. EMS Approval

The prior version of this EMS was approved by DPHI (letter dated 20/04/2026).

In accordance with:

- Condition 6 of the TCM Development Consent (DA41/98)
- Condition C1 of the ATP Development Consent (DA10/2015/004/003)
- Condition B1(a) of the Constellation Project Development Consent (SSD-41579871)

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This EMS was provided to the DPHI and Bogan Shire Council via the Major Projects Portal. TRL received comments from DPHI (Letter dated 21/04/2026) regarding some minor suggested amendments to the EMS. All comments and required amendments have been made in the EMS and a summary of changes made and a description of how TRL has addressed comments has been provided to DPHI. No comments were received from Bogan Shire Council by the end of the consultation period.

The EMS was subsequently approved by a nominee of the Planning Secretary (letters dated 28 April 2026) as meeting the requirements of the TCM Development Consent (DA41/98) and the Constellation Project Development Consent (SSD-41579871).

2. EMS FRAMEWORK

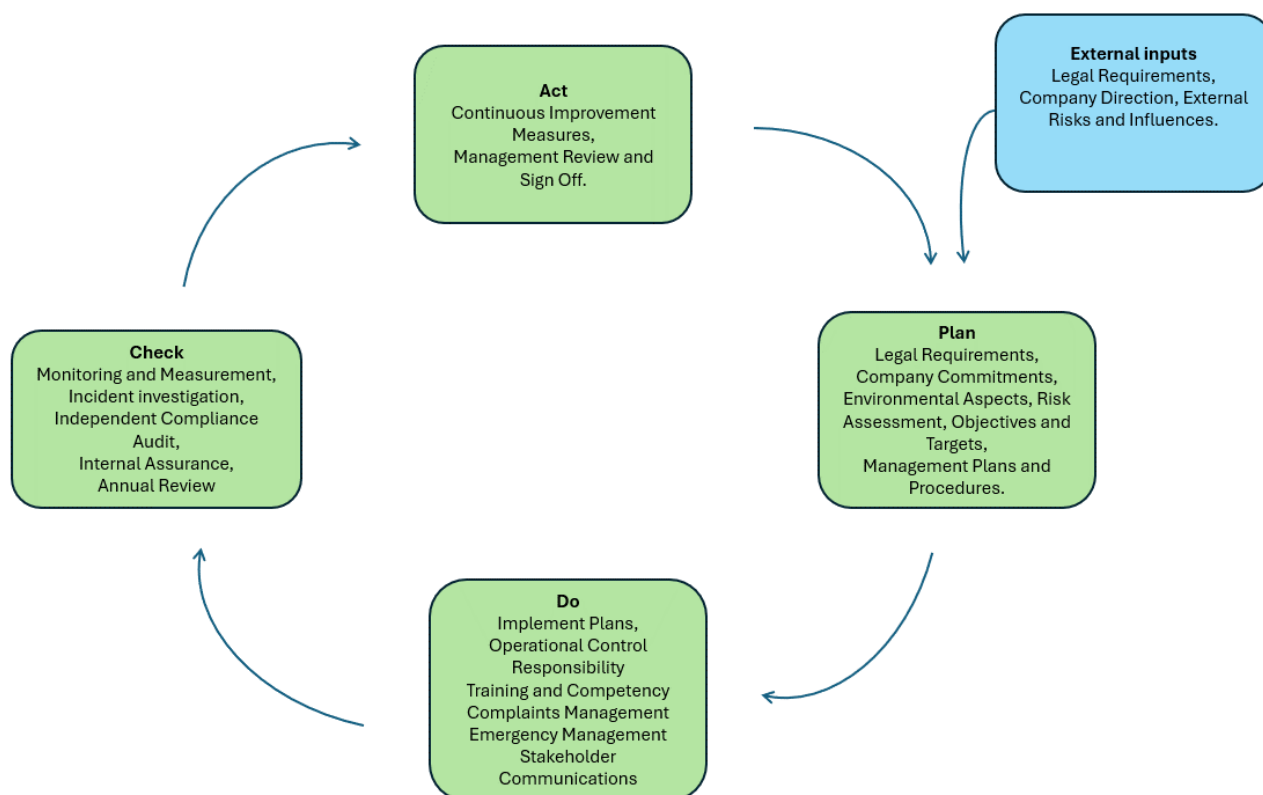
This EMS incorporates the principles of continuous improvement and is consistent with the five pillars of AS/NZS ISO 14001:2016 - *Environmental Management Systems -Requirements with guidance for use* (Standards Australia, 2016) (Figure 8).

This overarching Environmental Management Framework includes:

- legal and other obligations register;
- environmental risk register;
- objectives and targets program;
- specific environmental management plans (Section 5.8)
- supporting procedures and work instructions;
- environmental monitoring programs;
- reporting and review processes;
- training and awareness programs;
- emergency preparedness and response plans;
- document control system;
- records management system; and
- internal and external communication processes.

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Figure 8 EMS Framework



While the development of an EMS is specifically required by the TCM Development Consent (DA41/98), ATP Development Consent (DA 10/2015/004/003) and the Constellation Project Development Consent (SSD-41579871), the framework and principles as outlined in this EMS will generally be applied to all Tritton Copper Operations. In general terms, the highest level of environmental control will be applied to all Tritton Copper Operations regardless of whether the respective consent requires it. However, some aspects such as specific reporting requirements as stated in the respective consents will be followed. This EMS will attempt to describe and apply these exceptions.

3. LEGAL AND OTHER REQUIREMENTS

3.1. Relevant Statutory Requirements, Policies and Guidelines

TRL's statutory obligations relevant to environmental management are contained in:

- the conditions of Development Consent;
- relevant approvals, licences, permits, and leases; and
- other relevant legislation.

3.2. Development Consents

Tritton Copper Operations are approved under Part 4 of the NSW Environmental Planning and Assessment Act 1979. Relevant consents include:

- Tritton Copper Mine (DA 41/98 (including Modification 9)) approved by the NSW Minister for Urban Affairs and Planning and is a designated State Significant Development (DPHI 2025).
- Murrawombie Copper Mine (DA 1/91 (including Modification 5 (DA 2015/010/4)) approved by Bogan Shire Council (Bogan Shire Council 2024).
- North East Copper Mine (DA 6/95 (including Modifications)) approved by Bogan Shire Council (Bogan Shire Council 2010).
- Avoca Tank Project (DA 10/2015/004/003 (including Modification 2)) approved by Bogan Shire Council (Bogan Shire Council 2025).
- Constellation Project (SSD-41579871) Approved by Director Resource Assessments - Energy, Resources and Industry Assessments (DPHI 2025)

3.3. Approvals, Licences, Permits and Leases

In addition to the requirements of the various TRL Development Consents, activities associated with the Tritton Copper Operations are undertaken in accordance with the following licences, permits and leases:

- Mining Lease (ML):
 - Tritton Copper Mine – ML 1544
 - Murrawombie Copper Mine – ML 1280
 - North East Copper Mine – ML 1383
 - Avoca Tank Project– ML 1818
 - Mining Purpose Lease (MPL) 294 (water extraction pipeline) and MPL 295.
 - Constellation Project Mining Lease (once issued)
- Mining Act 1992 (Mining Act).
 - Rehabilitation Management Plans, Forward Programs and other required rehabilitation outcome documents prepared in accordance with Mining Lease Standard Conditions.
- Environment Protection Licences (EPL) (issued under the NSW Protection of the Environment Operations Act 1997 (PoEO Act)):
 - EPL 4501 (Murrawombie, North East and Avoca Tank Copper Mines) (current version dated 16 December 2025). An EPL variation application will be submitted to include the Constellation Project in EPL 4501. Once issued, the revised EPL will be included in future revisions of this strategy.
 - EPL 11254 (Tritton Copper Mine). (current version dated 8 June 2021).
- Water supply works, water use approvals, water access licences issued under the NSW Water Management Act 2000 (WM Act).

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- Monitoring bore licences issued under the NSW Water Act 1912 (Water Act).
- Crown Lands licences under the NSW Crown Lands Management Act 2016.
- Consent and concurrence under the NSW Roads Act 1993.
- Approvals from relevant councils under the NSW Local Government Act 1993 (e.g. approval to install and operate a sewerage management system).

3.4. Other Legislation

TRL will conduct the Tritton Copper Operations consistent with the requirements of the various Development Consent as described in Section 3.2 and any other legislation applicable to an approved Part 4 project under the EP&A Act, which include, but are not limited to:

- Aboriginal Land Rights Act 1983;
- Biodiversity Conservation Act 2016;
- Biosecurity Act 2015;
- Crown Land Management Act 2016;
- Contaminated Land Management Act 1997;
- Dams Safety Act 2015;
- EP&A Act;
- Fisheries Management Act 1994;
- Forestry Act 2012;
- Heritage Act 1977;
- Local Government Act 1993;
- Mining Act;
- Mining Amendment (Standard Conditions of Mining Leases - Rehabilitation) Regulation 2021 (Mining Amendment Regulation);
- National Parks and Wildlife Act 1974;
- Pipelines Act 1967;
- PoEO Act;
- Radiation Control Act 1990;
- Roads Act 1993;
- Rural Fires Act 1997;
- Water Act;
- WM Act;
- Work Health and Safety Act 2011; and
- Work Health and Safety (Mines and Petroleum Sites) Act 2013.

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Commonwealth Acts which may also be applicable to the conduct of the TRL include:

- Environmental Protection and Biodiversity Conservation (EPBC) Act 1999;
- Native Title Act 1993; and
- National Greenhouse and Energy Reporting Act 2007.

Relevant licences or approvals required under these acts will be obtained as required.

3.5. Aeris Resources' Policies and Commitments

Aeris resources maintain and apply a number of policies, charters, statements and codes of conduct. The most relevant policy as it applies to this EMS is the Aeris Resources Sustainability Policy Statement (dated 1 June 2023 and signed by the Executive Chairman). This policy is communicated to all employees and contractors, displayed prominently throughout the operations, and made available to the public via the Aeris Resources website. The Policy is contained as Appendix A.

3.6. Other Key Commitments

Aeris Resources and TRL's key commitments as they relate to environmental management include:

- Compliance: We will comply with all applicable environmental laws, regulations, and other requirements to which we subscribe.
- Risk Management: We will Identify, analyse, and manage sustainability-related risks and opportunities through application of our Risk Management Framework.
- Prevention of Pollution: We will implement best practice measures to prevent pollution of air, water, and land.
- Resource Efficiency: We will maximize the efficient use of energy, water, and raw materials.
- Biodiversity Protection: Contribute to the conservation of biodiversity by implementing integrated approaches to land use planning and environmental management in areas affected by our operations.
- Waste Minimisation: We will reduce, reuse, and recycle waste wherever possible.
- Continual Improvement: We will continually improve our environmental management practices and performance.
- Transparency: We will openly communicate our environmental performance to stakeholders.
- Sustainable Development: We will integrate environmental considerations into our business planning and decision-making processes.

3.7. Relevant Guidelines, Codes and Standards

Relevant Guidelines considered when developing this EMS and related documents include:

- Annual Review Guideline (Department of Planning and Environment (DPE), 2015);
- Community Consultative Committee Guidelines for State Significant Projects (DPE, 2023);
- Form and Way: Rehabilitation Management Plans for large mines (NSW Resources Regulator, 2021);

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- Guideline: Pollution Incident Response Management Plans (PIRMP) (NSW Environment Protection Authority (EPA), 2022);
- Hazardous Industry Planning Advisory Paper No.1, 'Emergency Planning' (NSW Department of Planning (DPI), 2011);
- Hazardous Industry Planning Advisory Paper No.6, 'Hazard Analysis' (DP, 2011);
- Hazardous Industry Planning Advisory Paper No.8, 'HAZOP Guidelines' (DP, 2011);
- Independent Audit – Post Approval Requirements (DPIE (Department of Planning, Industry and Environment), 2020);
- State Significant Development Guidelines (DPIE, 2024);
- Post Approval Guidance, Environmental Management Plan Guideline (Department of Planning, Industry and Environment (DPIE 2020);
- International Council on Mining and Metals (ICMM) Principles (<https://www.icmm.com/>);
- Minerals Council of Australia Enduring Value Framework for Sustainable Development (<https://minerals.org.au/policies/sustainability/enduring-value-framework/>);
- AS/NZS ISO 14001:2016 - *Environmental Management Systems -Requirements with guidance for use* (Standards Australia, 2016); and
- Building Code of Australia

4. OBJECTIVES AND TARGETS

4.1. Objectives and Targets

Objectives and targets are developed to set the environmental performance criteria for TRL and are tracked and reported in each annual review where required.

Objectives and targets are developed and / or revised on an annual basis and included in the respective strategy or management plan as relevant, along with measures to meet the objective or targets. Draft objectives and targets are proposed by the Environmental Superintendent in consultation with the HSET Manager and ultimately 'signed off' and accepted by TRL Management during their review and approval of strategies or management plans, or the annual review (under Aeris Resources delegation of authority).

Aiming to continually improve the environmental performance of TRL, objectives and targets are developed based on the following:

- review of legal requirements (any new requirements or amendments to existing legal obligations);
- review of any non-compliances, exceedances, reportable incidents, community complaints, emergencies etc (including emerging trends);
- review of the Environmental Risk Register (any new risks identified or expected to increase in likelihood or consequence); and

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- review of environmental monitoring data (including trends that may indicate an increased risk of future non-compliances, exceedances or not demonstrating 'continuous improvement' in environmental performance).

5. EMS IMPLEMENTATION AND OPERATION

5.1. Roles and Responsibilities

All workers, contractors and visitors have a responsibility for the environmental performance of the Tritton Copper Operations. The following specific roles are responsible for the implementation of various component of this EMS (Table 4). As per Aeris Resources policies and procedures, where relevant, specific responsibilities are included in position descriptions and assessed as part of annual performance review cycles. Roles operate within the Aeris Resources 'delegation of authority' matrix.

Table 4 EMS Roles and Responsibilities

TRL Role	Responsibility
Board of Directors.	Approve company-wide environmental policy and strategic objectives. Ensure adequate resources are allocated for environmental management.
Chief Technical Officer.	Overall accountability for environmental performance across the company. Ensure environmental considerations are integrated into business strategy.
Site General Manager.	Overall accountability for the environmental performance of the Tritton Copper Operations. Ensure adequate resources are available for EMS implementation. Review and endorse site-specific environmental objectives, and targets (under TRL delegation of Authority). Responsible for the oversight of stakeholder engagement and communication. Chair TRL Senior Leadership Team (SLT) Meeting (which functions as 'Management Review' of the EMS). Promote a culture of environmental stewardship across the site.
Health, Safety, Environment and Training (HSET) Manager.	Responsible for the site safety management system, emergency response, and environmental performance of the TRL (including implementation of the EMS). Ensure compliance with legal and other requirements. Provides relevant information to the TRL SLT Meeting regarding environmental performance and facilitates 'Management Review' of the EMS.

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TRL Role	Responsibility
Department Managers	Responsible for implementation of environmental risk controls, as they apply to their specific area(s) of responsibility. Ensure staff are trained in relevant environmental procedures. Incorporate environmental considerations into operational planning. Report environmental incidents and non-conformances immediately. Participate in environmental risk assessments and audits. Responsible for conducting their activities in a proper and efficient manner.
Environmental Superintendent.	Develop, approve, implement, and maintain the EMS. Ensure compliance with legal and other requirements. Responsible for the identification of environmental risk and tracking the implementation of risk controls. Responsible for the identification, reporting, investigation, and corrective actions associated with environmental incidents and non-compliances. Overall accountability for implementing monitoring programs and associated reporting. Provide environmental training and advice to all departments. Liaise with regulatory authorities on environmental matters. Prepare internal and external environmental reports.
Senior Environmental Advisors Environmental Advisors and Environmental Technicians.	Responsible for implementing: • environmental monitoring programs; • undertaking environmental inspections; • implementing environmental awareness programs; • implementing other environmental programs; and • Other tasks as directed by the Environmental Superintendent.
Community Relations Officer.	Responsible for the development, coordination and dissemination of information to community stakeholders.

5.2. Environmental Risk Register

TRL maintain an Environmental Risk Register (TRL-HSET-RAS-0006). The Environmental Risk Register:

- identifies environmental aspects and impacts;
- assesses inherent risk levels (before controls) using the TRL Risk Matrix
- identifies and assesses the effectiveness of current controls;
- identifies additional controls required to manage the risk;
- assesses residual risk levels (after the implementation of controls) using the TRL Risk Matrix; and
- identifies risk owners and timelines for implementation of additional controls.

Where required, risk assessment workshops are conducted with cross-functional teams including operations, maintenance, environmental, and management personnel.

The Environmental Risk Register is reviewed and if required updated on at least an annual basis in accordance with TRL procedures. Additional reviews may be undertaken based on the following triggers:

- significant changes to operations or processes;
- new projects or activities;
- significant incidents or near misses;
- changes to legislation or other requirements; or
- new scientific knowledge about environmental impacts.

High and extreme risks are reported to senior management monthly and are subject to specific management plans, (such as, for example the Hazardous Substances – Principal Hazard Management Plan (TRL-HSET-PHMP-0009)), monitoring programs and associated TRL procedures.

Risk control measures, as they relate to the Tritton Copper Operations are included in the respective Strategy or Management Plan document as described in Section 5.8.

Strategies and Management Plans further outline the operational controls, management measures, and mitigation measures employed to prevent and minimise risk. Strategies and management plans are managed as 'controlled documents' in accordance with TRL procedures. Actions arising from strategies and management plans are captured in the TRL Legal and Other Obligations' Register (TRL-HSET-REG-0002) (Section 5.4) and assigned to the risk / control owner for implementation. The completion of assigned actions is tracked by the Environmental Superintendent and reported to TRL Management.

5.3. Training and Competence

It is the responsibility of Aeris Resources to employ people that are appropriately trained, competent and have an appropriate level of experience and understanding to undertake their work in a manner that minimises impacts on the environment and community. The Environmental Superintendent role is appointed as the 'qualified and experienced person' at Tritton Copper Operations as per Condition 5 of the TCM Development Consent DA 41/98.

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TRL utilises an electronic system (Pegasus) to track the key competencies of employees and contractors, including when key competencies may have expired and require re-certification. Pegasus is managed and administered by the TRL Human Resources Manager.

The site general induction provides key information that the general workforce must understand to meet their basic environmental obligations and consent requirements (Condition 3J TCM Development Consent DA 41/98 and Condition A18 of the Constellation Project Development Consent (SSD-41579871)). The site general induction includes:

- legal (including conditions of development consent) and other statutory obligation (as relevant to the general workforce);
- environmental policy and key commitments;
- significant environmental aspects and impacts of site operations;
- overview of key environmental management plans and procedures;
- incident reporting requirements and procedures; and
- environmental emergency response procedures Individual environmental responsibilities.

The induction includes a competency assessment to ensure key messages are understood.

Roles that have specific requirements for environmental management, such as 'owners' of identified 'risks or controls' may, depending on the nature of the risk, receive additional training or direction; through either external parties / formal training or via direct instruction (including providing documented procedures) from the Environmental Superintendent (or by delegation). Roles with specific environmental responsibilities are made aware of their responsibilities via inclusion in their respective position descriptions.

TRL have developed a training matrix to identify roles that have environmental responsibility and identifies the specific skills, training, knowledge, or experience required to undertake their roles.

5.4. Legal and Other Obligations Register

TRL maintains an Environmental Legal and Other Obligations Register (TRL-HSET-REG-0002) as a consolidated record of key compliance requirements, actions, and commitments. The register includes the following items:

- legal obligations arising from approvals, licences and permits;
- legal obligations arising from other federal or state acts and regulations;
- specific actions arising from approved strategies and management plans²;
- actions arising following the investigation of incidents, non-compliances, community complaints;
- actions arising from audits and inspections; and
- commitments made to stakeholders.

² **Note:** The Environmental Legal and Other Obligations Register does not include all management actions. Actions and programs that are well embedded in the business and are considered 'business as usual', or actions with a 'low' risk (consequence or likelihood) are generally excluded from the register.

The Environmental Legal and Other Obligations Register is housed within an excel spreadsheet and is reviewed and if required updated on a periodic basis (or more frequently if there are significant legislative changes) by the Environmental Superintendent in accordance with TRL procedures.

The updated Legal and Other Obligations Register is considered during the development and / or revision of strategies and management plans to ensure that all obligations are included, and measures to meet the relevant requirements are documented and implemented. The review process may also include but is not limited to:

- subscription to regulatory update services;
- consultation with legal advisors;
- participation in industry forums and working groups; and
- review of regulator websites, guideline documents and communications.

The meeting of legal requirements and other key actions from the register is tracked by the Environmental Superintendent. Any lagging or at risk items are initially discussed with the relevant manager or if required, escalated to the TRL SLT for discussion (via the HSET Manager). Where required, corrective measures are assigned to department managers or other roles.

5.5. Works Program Schedule

The TRL Environmental Superintendent develops, maintains, and tracks a detailed works program schedule (register of tasks) that captures the key tasks and projects to be completed in each financial year. The schedule is linked to the life of mine plan and TRL budget cycle and identifies:

- the task to be completed; as extracted from the Environmental Legal and Other Obligations Register, approved management plans and strategies and other tasks approved via the TRL SLT Meeting;
- the source of the task (e.g. management plan) where further context can be obtained;
- the persons accountable and responsible for completing the task;
- the required timeframe / target date for completion; and
- any other relevant information (such as budget or personnel resources required to complete the task).

This register is reviewed and updated on a periodic basis by the Environmental Superintendent. Any lagging or at risk tasks are escalated to the relevant manager or to the HSET Manager for tabling at the TRL SLT Meeting.

5.6. Documentation and document control

The EMS Framework utilises the following document hierarchy (Figure 9). The most relevant documents, as they relate to this EMS are the Strategies and Management Plans as required by the various TRL consents.

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Figure 9 Document Hierarchy



5.7. Document Control

Aeris Resources, including TRL, implement a document control system that is housed within INX; a commercial document control, incident investigation, and action management system. Key documents are assigned a document number and are securely (electronically) stored and are accessible via the Aeris Resources SharePoint. Documents include a summary of version history and INX retains a copy of all previous versions and edits. Key documents are approved as per the TRL 'delegation of authority.' All EMS documents are controlled according to Aeris Resources' document control procedure (TRL-HSET-PLN-0012).

Key features of the Aeris Resources document control system include:

- Documents are assigned a unique document identification number.
- Documents include version control and revision history.
- Documents are reviewed and approved by authorised personnel prior to issue as per the TRL Delegation of Authority.
- All EMS documents are stored in a centralised electronic document management system.
- Changes and revisions are clearly identified and communicated.
- Current versions of documents are available at all points of use.
- Access controls ensure only authorised personnel can modify documents.
- Obsolete documents are promptly removed or clearly identified to prevent unintended use.
- Documents are regularly reviewed and updated in accordance with TRL document control procedures.
- Automatic notifications of document updates to relevant personnel.

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A master list of EMS documents is maintained by the Environmental Superintendent and is reviewed on a periodic basis to ensure completeness and currency.

5.8. Strategies and Management Plans

The various TRL development consents require the development and approval of a number of strategies and management plans.

Tritton is taking a theme-based approach to management plans, combining related traditional environmental aspects and topics (Figure 10). This provides for simplification and agility for future changes or additions. Figure 10 below shows the themes and the environmental aspects that group beneath them. Following the approval of the Constellation Project, several 'stand alone' plans are proposed as indicated by an asterix (*) below in Figure 10.

Figure 10 Themes and Associated Environmental Aspects

Air Quality & GHG •Dust, odour, fumes •Greenhouse Gas	Biodiversity & Land •Flora & Fauna •Weeds & Pests •Visual Amenity and Landscape •*Constellation Project Biodiversity and Land Management Plan	Emergency •Bushfire •Pollution Incident Response •Emergency Response
Heritage •Cultural / Aboriginal •Historic •Natural •*Constellation Project Cultural Heritage Management Plan	Hydrocarbon & Chemical •Hazardous Substances •Hazardous Materials •Land Contamination	Noise & Vibration •Noise •Vibration •Blasting •Out of hours work protocol (Constellation)
Waste •Tailings •Disposal (Drill Cuttings) •Waste (hazardous / non-hazardous) •Waste Rock (AMD)	Water •Water Balance •Surface Water •Groundwater •Erosion & Sediment •AMD (water contamination) •*Constellation Project Water Management Plan	System •Management System •Document Management
Rehabilitation •*Constellation Project Rehabilitation Strategy •Landforms •Revegetation •Closure •Separate Rehabilitation Management Plans for each mining operation	Traffic •Traffic (external public roads)	Natural Hazards •Bushfire •Extreme weather events •Lightening

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Table 5 contains the proposed strategies and plans as relevant to this EMS and cross references against the requirements of the various TRL consents.

Table 5 demonstrates that all required plans from the various TRL consents are included in the EMS framework as described in this strategy.

The proposed strategies and management plans:

- summarise relevant legislative requirements, development consent conditions, limits or performance measures and other commitments;
- contain all required detail and content as specified in the relative TRL development consents (for example, Condition B4 of the Constellation Project Development Consent (SSD-41579871);
- provides detail and evidence of any required consultation with other regulatory agencies / parties as specified in the respective development consent;
- provide a summary of the environmental context (background / baseline information) as related to the strategy or management plan topic / aspect;
- identifies relevant sensitive receivers and other potentially affected stakeholders;
- draw information from the risk register and studies conducted as part of any environmental assessments (including proposed mitigation measures and recommendations);
- includes where relevant (to the TCM), any recommendations from Preliminary Hazard Analysis conducted for the TCM by McCracken Consulting, dated December 1998;
- proposes targets and objectives to guide the environmental performance of TRL;
- proposes and assigns management measures to avoid, minimise and control environmental and community risks and to meet legal requirements and commitments;
- outlines any required monitoring and inspection programs;
- describes the management of emergencies, incidents, non-compliances, and community complaints as related to the topic / aspect; and
- outlines continuous improvement processes.

Subsequent versions of strategies and management plans incorporate continuous improvement initiatives as described in later sections of this EMS.

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Table 5 TRL Strategies and Management Plans

EMS Strategy / Management Plan	Tritton Copper Mine	Murrawombie Copper Mine	North East Copper Mine	Avoca Tank Project	Constellation Project	Approval required by:		
	DA 41/98 (Mod 9)	DA 1/91 (Mod 5)	DA 6/95	DA 10/2015/004/003	SSD-41579871	NSW DPHI	Bogan Shire Council	Other
Environmental Management Strategy (this document)	Environmental Management Plan (6)	-	-	-	-	Yes	-	-
	-	-	-	Environmental Management Strategy (C1)	-	-	Yes	-
	-	-	-	-	Environmental Management Strategy (B1)	Yes	-	-
Air Quality and Greenhouse Gas Management Plan	^Dust Management Strategy (6(v))	-	-	-	-	Yes	-	-
	^Greenhouse Gas Mitigation Plan (49B)	-	-	-	-	Yes	-	-
	-	-	-	-	Air Quality and Greenhouse Gas Management Plan (C2)	Yes	-	-
*Emergency Management Plan	Emergency Plan (53(a))	-	-	-	-	Yes	-	-
Safety Management System	Safety Management System (53(b))					Yes		

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EMS Strategy / Management Plan	Tritton Copper Mine	Murrawombie Copper Mine	North East Copper Mine	Avoca Tank Project	Constellation Project	Approval required by:		
	DA 41/98 (Mod 9)	DA 1/91 (Mod 5)	DA 6/95	DA 10/2015/004/003	SSD-41579871	NSW DPHI	Bogan Shire Council	Other
Traffic Management Strategy	#@Traffic Management Strategy (C6(iii))	-	-	-	-	Yes	-	-
	#@Drivers Code of Conduct (6(iii), 37A)	-	-	-	-	Yes	-	-
	-	-	-	Code of Conduct (B25)	-	-	-	-
	-	-	-	-	@#Traffic Management Plan (C35)	Yes	-	-
Natural Hazards Management Plan	-	-	-	Bushfire Management Plan (B13), (C1(g(ix)))	-	-	Yes	-
Hydrocarbon and Chemical Management Plan	-	-	-	Hydrocarbon Management Plan (C1(g(iii)))	-	-	Yes	-
Noise and Vibration Management Plan	^Noise and Vibration Management Strategy (6(iv))	-	-	-	-	Yes	-	-
	^ Blasting Protocol (50)	-	-	-	-	Yes	-	-
	-	-	-	-	Out of Hours Work Protocol (C6).	Yes	-	-

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EMS Strategy / Management Plan	Tritton Copper Mine	Murrawombie Copper Mine	North East Copper Mine	Avoca Tank Project	Constellation Project	Approval required by:		
	DA 41/98 (Mod 9)	DA 1/91 (Mod 5)	DA 6/95	DA 10/2015/004/003	SSD-41579871	NSW DPHI	Bogan Shire Council	Other
Biodiversity and Land Management Plan	^B Contingency Strategy (6(ii))	-	-	-	-	Yes	-	-
	Landscape Plan (29)	-	-	-	-	-	Provide only	-
	^A Management and Monitoring Plan (23)	-	-	-	-	Yes	-	-
	Plan to include management measures for any fauna and flora species listed under the Threatened Species Conservation Act 1995 that occur on the site (6(x))	-	-	Biodiversity Management Plan (B7)	-	-	Yes	-
		-	-	Pest Animal Management Plan (C1(g(v)))	-	-	Yes	-
	-	-	-	Weed Management Plan (C1(g(vi)))	-	-	Yes	-
	-	-	-	Fauna Management Plan (C1(g(vii)))	-	-	Yes	-
Constellation Project Biodiversity and Land Management Plan	-	-	-	-	^B Biodiversity Management Plan (C27)	Yes	-	-

Environmental Management Strategy

EMS Strategy / Management Plan	Tritton Copper Mine	Murrawombie Copper Mine	North East Copper Mine	Avoca Tank Project	Constellation Project	Approval required by:		
	DA 41/98 (Mod 9)	DA 1/91 (Mod 5)	DA 6/95	DA 10/2015/004/003	SSD-41579871	NSW DPHI	Bogan Shire Council	Other
Heritage Management Plan	^H Management and Protection measures (45) (Aboriginal archaeological sites only).	-	-	-	-	Yes	-	-
	-	-	-	Aboriginal Heritage Management Plan (C1(g(i)))	-	-	Yes	-
	-	-	-	Historic Heritage Management Plan (C1(g(ii)))	-	-	Yes	-
Constellation Project Cultural Heritage Management Plan	-	-	-	-	-	-	-	-
Waste Management Plan	-	Waste Rock Management Plan (27)	-	-	-	-	-	Provide to EPA
	^{^D} Tailings Extraction Management Plan (13B)	-	-	-	-	Yes	-	-
	^{^D} Disposal Management Plan (13C)	-	-	-	-	Yes	-	-
	[^] Acid Mine Drainage Strategy (20)	-	-	-	-	-	-	-

Environmental Management Strategy

EMS Strategy / Management Plan	Tritton Copper Mine	Murrawombie Copper Mine	North East Copper Mine	Avoca Tank Project	Constellation Project	Approval required by:		
	DA 41/98 (Mod 9)	DA 1/91 (Mod 5)	DA 6/95	DA 10/2015/004/003	SSD-41579871	NSW DPHI	Bogan Shire Council	Other
Water Management Plan	-	-	Erosion Control Plan	-	-	-	-	-
	-	Water Management Plan	-	-	-	-	Yes	-
	-	Erosion and sediment Control Plan	-	-	-	-	Provide only	-
	^{^w} Water Management Plan (13F)	-	-	-	-	Yes	-	-
	-	-	-	^w Water Management Plan (B23), (C1(g(viii)))	-	-	Yes	-
	-	-	-	Soil and Water Management Plan (C1(g(iv)))	-	-	Yes	-
Constellation Project Water Management Plan	-	-	-	-	^{w^} Water Management Plan (C22)	Yes	-	-
Rehabilitation Strategy					^{\$} Rehabilitation Strategy (C48)	Yes	-	-

Environmental Management Strategy



EMS Strategy / Management Plan	Tritton Copper Mine	Murrawombie Copper Mine	North East Copper Mine	Avoca Tank Project	Constellation Project	Approval required by:		
	DA 41/98 (Mod 9)	DA 1/91 (Mod 5)	DA 6/95	DA 10/2015/004/003	SSD-41579871	NSW DPHI	Bogan Shire Council	Other
Rehabilitation Management Plan / Forward program	Required under Mining Lease - Standard Conditions and forms part of the TRL EMS. Separate plans are prepared for each mining operation with the exception of the North East Copper Mine and the Avoca Tank Project which are combined into a single plan, due to the sharing and overlap of site infrastructure.							
Pollution Incident Response Management Plan (PIRMP).	The PIRMP, as required by the POEO Act forms part of the TRL EMS, however is not specifically required by TRL development consents.							
Notes: ^Formal consultation required with the NSW EPA #Formal consultation required with the Transport for NSW @Formal consultation required with the Bogan Shire Council ®Formal consultation required with the CPHR \$Formal consultation required with the NSW Resources Regulator ^HFormal consultation required with Heritage NSW ^DFormal consultation required with NSW Dam Safety ^WFormal consultation required with DCCEE Water (also referred to as DPI Water in the ATP development consent) *The key owner of these documents is the TRL Health and Safety Superintendent. For the purpose of this EMS, the Health and Safety Superintendent would undertake the equivalent tasks for these plans as described for the Environmental Superintendent.								

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5.8.1. Management Plan Review

Required strategies and management plans for the TRL are provided in Table 5

5.8.1.1. TCM and ATP

Condition 6B of the TCM Development Consent (DA 41/98) and Condition C5 of the ATP Development Consent (DA 10/2015/004/003) require that:

‘within three months of the submission of an Annual Review, Incident Report, Independent Environmental Audit or any modification to development consents, the applicant shall review, and if necessary, revise, the strategies, plans and programs required under the consents to the satisfaction of the Secretary (TCM development consent) or Bogan Shire Council (ATP development consent).

The TCM development consent requires that the revisions are completed, and the revised document is submitted to the Secretary within six weeks of the complete review. The six week timeframe is interpreted by TRL to be the date that the revised plan is submitted via the Major Projects Portal for consultation and / or approval.

5.8.1.2. Constellation Project

Condition B12 of the Constellation Project Development Consent (SSD-41579871); requires that *within three months of:*

- a) *the submission of an incident report under condition D3;*
- b) *the submission of an Independent Environmental Audit under condition D5;*
- c) *the approval of any modification of the conditions of this consent; and*
- d) *notification of a change in the development phase under condition A11.*

the Applicant must review and, if necessary, revise the strategies, plans and programs required under this approval to the satisfaction of the Planning Secretary. Where this review leads to revisions in any such document, the revised document must be submitted to the Planning Secretary for approval within four weeks of the review.

The four week timeframe is interpreted by TRL to be the date that the revised plan is submitted via the Major Projects Portal for consultation and / or approval.

TRL will review and if required revise applicable management plans and strategies as per these requirements; where TRL management plans are combined into a single document (Table 5), the most conservative trigger (i.e most frequent) will be applied, and the required review commenced.

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5.9. Operational Control

Operational control is critical to managing environmental risks and ensuring compliance with legal and other requirements.

TRL has implemented a system of operational control for activities with potential environmental impacts. Activities requiring operational control have been identified using the Environmental Risk Register (Section 5.2) using a risk based approach. In general, risks with an overall risk ranking of medium (or higher) require operational control measures. A register is maintained identifying activities requiring operational control and associated control measures.

Operational control measures may include some or all of the following processes and measures (also refer to Figure 9):

- environmental operating procedures;
- work instructions and standard operating procedures;
- permit systems (for example Surface Disturbance Permit, Hot Work Permit etc);
- maintenance programs and schedules;
- contractor and works supervision, including inspection and reporting regimes;
- operational / toolbox meetings; and
- change management processes.

Further detail regarding operational control is included in the respective strategy or management plan (Table 5).

The effectiveness of operational control measures are reviewed and if required revised on a periodic basis, in accordance with TRL document control procedures, or where triggered by:

- an incident;
- non-compliance;
- monitoring results;
- inspections;
- audits; or
- where stated performance measures, objectives of targets have not been met.

Any revision of operational controls is formally communicated and or issued to affected parties.

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5.10. Emergency preparedness and Response

5.10.1. TRL Emergency Management Plan

TRL has existing programs and procedures for identifying, reporting / escalating, and managing emergencies in accordance with the Emergency Management Plan (TRL-PSE-PLN-0023).

Site personnel, via the TRL general induction are trained in the identification and reporting of emergencies.

Site based emergency response personnel and equipment are available to provide initial response and assistance. Regular training and drills are conducted to maintain readiness.

As required, external resources are available locally to assist with emergency response including the NSW Rural Fire Service, (based in Girilambone, Hermidale and in Nyngan) and the NSW Police, NSW Ambulance, NSW Health, Fire and Rescue NSW and State Emergency Services (SES) based in Nyngan.

5.10.2. Pollution Incident Response Management Plan

In addition to the Emergency Management Plan, TRL maintain a Pollution Incident Response Management Plan (PIRMP) (TRL-HSET-PLN-0016) (as required by the POEO Act) for the management of incidents and emergencies that may result in pollution or material harm to the environment, including harm to the community.

Key environmental emergency scenarios identified include:

- major chemical or hydrocarbon spills;
- tailings dam failure;
- uncontrolled releases to air or water;
- natural disasters (e.g., flood, bushfire); and
- transportation accidents involving hazardous materials.

Following the initial control of all emergency situations, investigations are conducted to identify basic and root causes, implement actions to mitigate impacts and prevent recurrence and to improve future emergency responses. Investigations are conducted using existing TRL procedures; INX is used for the recording of the investigation and the tracking (through to completion).

5.11. Communication

Effective communication is crucial for successful implementation of the EMS. The TRL communication strategy includes both internal and external stakeholders.

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5.11.1. Internal Communication

Internal environmental communication occurs through:

- Management Communication:
 - o Monthly environmental performance reports to senior management (TRL SLT Meeting).
 - o Annual performance review with all department managers.
- Regular Meetings:
 - o Weekly operational meetings.
 - o Quarterly all-staff briefings.
- Digital Communication:
 - o Environmental alerts and bulletins on the company intranet.
- Face-to-face Communication:
 - o Daily pre-start meetings with environmental topics.
 - o Toolbox talks on specific environmental themes.
 - o Environmental inspections accompanied by management and workforce representatives.
- Visual Communication:
 - o Environmental noticeboards in operational areas and common rooms.
 - o Posters and signage promoting environmental initiatives.

5.11.2. External Communication

External stakeholder communication is managed through:

- Regulatory Communication:
 - o Regular meetings with key regulatory agencies.
 - o Prompt notification of environmental incidents as per licence requirements.
 - o Submission of annual environmental reports to relevant authorities.
- Community Communication:
 - o Quarterly Community Consultative Committee meetings.
 - o Participation in local environmental events and initiatives.
- Public Reporting:
 - o Annual Sustainability Report with detailed environmental performance data.
 - o Monthly reporting of environmental performance data.
 - o Monthly reporting of community complaints.
 - o Access to information (See Section 5.11.4).

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- Stakeholder Engagement:
 - o Targeted briefings for key stakeholders on specific environmental issues.
 - o Participation in local and regional environmental forums.
 - o Engagement with environmental NGOs on biodiversity initiatives.
- Grievance Mechanism:
 - o Community phone number for environmental complaints or enquiries.
 - o Transparent process for investigating and responding to community concerns.
 - o Regular reporting on complaint statistics and resolution.

A detailed Stakeholder Communication Plan is maintained by the Community Relations Officer outlining specific communication strategies for each stakeholder group.

5.11.3. External Reporting

The various approvals and permits held by TRL contain requirements for external reporting. The key external compliance reports required by development consent are presented in this section.

5.11.3.1. Annual Review

An Annual Review Report is required by:

Condition 6A of the Tritton Copper Mine (DA 41/98).

By the end of March each year, unless the Secretary agrees otherwise, the Applicant must review the environmental performance of the development for the previous calendar year to the satisfaction of the Secretary.

Condition C4 of the Avoca Tank Project (DA 10/2015/004/003)

By the end of July each year following the development commissioning, or other timing as may be agreed by Bogan Shire Council, the Applicant shall review the environmental performance of the development to the satisfaction of Bogan Shire Council.

Condition D4 of the Constellation Project Development Consent (SSD-41579871)

An annual review reporting the environmental performance of the development must be submitted to the department by the end of September each year after the commencement of development under this consent, or other timeframe agreed by the Planning Secretary; and to [Bogan Shire] Council.

In accordance with the above conditions, TRL will review the environmental performance of the required mining operations by the respective due date each year. The Annual Review document will include the specific content as described by the relevant conditions.

An annual review or annual report will not be produced for operations, where the relevant primary consent does not specifically require one.

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5.11.3.2. Environment Protection Licence - Annual Return

Condition R1 of the two Environment Protection Licences held by TRL (EPL 4501 -Murrawombie, North East and Avoca Tank Project Mines and EPL 11254 - Tritton Copper Mine) require the completion of an Annual Return³.

The annual return will be submitted, via the EPA's 'EConnect' portal in accordance with conditions and within 60 days after the licence anniversary date. The completion of the EPL annual return is included in the TRL legal Register to ensure completion.

As the EPL's are 'premise based' all mining operations will be included in the annual returns as stipulated by the respective EPL.

5.11.3.3. Annual Rehabilitation Report

Condition 13(2) of the Standard Mining Lease Conditions requires the completion of an Annual Rehabilitation Report. The Annual Rehabilitation Report is to be submitted to the NSW Resources Regulator within 60 days of the anniversary of granting the mining lease (unless otherwise agreed with the NSW Resources Regulator). The Annual Rehabilitation Report will be prepared in the Form and Way provided by the NSW Resources Regulator and made publicly available on the Company website. The completion of the Annual Rehabilitation Report is included in the TRL Legal and Other Obligations Register (TRL-HSET-REG-0002) to ensure completion. Separate Annual Rehabilitation Reports are completed for each mining lease held by TRL including:

- Tritton Copper Mine – ML 1544
- Murrawombie Copper Mine – ML 1280
- North East Copper Mine – ML 1383 and Avoca Tank Project– ML 1818 (Combined)
- Constellation Project (once commenced)

5.11.4. Access to information

Condition 8A of the TCM Development Consent (DA 41/98), Condition C10 of the ATP Development Consent (DA 10/2015/004/003) and Condition D9 of the Constellation Project Development Consent (SSD-41579871) require the publishing of information on the Company website. In addition, Section 66(6) of the POEO Act requires the publishing of monitoring data, where required to be collected by any Environmental Protection Licence.

To meet the above requirements, TRL will publish the following information on the Company website and keep it up to date⁴:

- TCM Development Consent (DA 41/98) (including modifications);
- Tritton EIS (including environmental assessments undertake to support modifications);
- ATP Development Consent (DA 10/2015/004/003) (including modifications);
- Avoca Tank Project EIS (or equivalent) (including environmental assessments undertaken to support modifications);

³ Including the EPL for the Constellation Project once granted.

⁴ For the Constellation Project, the above information will be available within 12 months of the commencement of the development.

- Constellation Project Development Consent (SSD-41579871);
- Constellation Project EIS;
- Environmental Protection Licences;
- Mining Leases;
- Rehabilitation outcome documents as required by Standard Mining Lease Conditions.
- All approved strategies, plans and programs required under the conditions of consent (Refer Section 5.8);
- the proposed staging plans for the development (if the construction, operation or decommissioning of the development is to be staged);
- Regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent (Refer to Section 5.8);
- a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, any approved environmental management documents or EPLs;
- a summary of the current phase and progress of the development;
- contact details to enquire about the development or to make a complaint;
- a complaints register, updated monthly (all TRL operations);
- Minutes of CCC Meetings;
- the Annual Reviews of the development;
- audit reports prepared as part of any Independent Environmental Audit of the development and the Applicant's response to the recommendations in any audit report; and
- any other matter required by the Secretary (Tritton / Constellation), or Bogan Shire Council (Avoca Tank);

6. MONITORING AND MEASUREMENT

6.1. Environmental Monitoring Programs

Monitoring is conducted for a range of parameters to satisfy the requirements of the various TRL Development Consents and Environment Protection Licences. Details of the specific monitoring programs developed for the TRL are included in the respective strategies and management plans (Table 5). Monitoring will be conducted in accordance with relevant statutory requirements, industry standards where applicable and undertaken by a suitably qualified and experienced person(s).

Table 6 provides a summary of environmental monitoring undertaken at the combined Tritton Copper Operations sites. Monitoring locations are shown on Figure 11 (TCM), Figure 12 (MCM), Figure 13 (NECM & ATP) and Figure 14 (Constellation Project)⁵. Routine inspection programs are not included in Table 6 and can be found in the respective management plan (refer to Section 5.8).

⁵ Note, due to the co-location of some monitoring, symbols in the following figures may be overlapping. Refer to the stated management plan for further detail.

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Data and results obtained from management programs will be routinely reviewed and assessed against:

- the relevant criteria / limits from the various TRL development consents,
- performance criteria
- any established triggers; and
- any established objectives and targets.

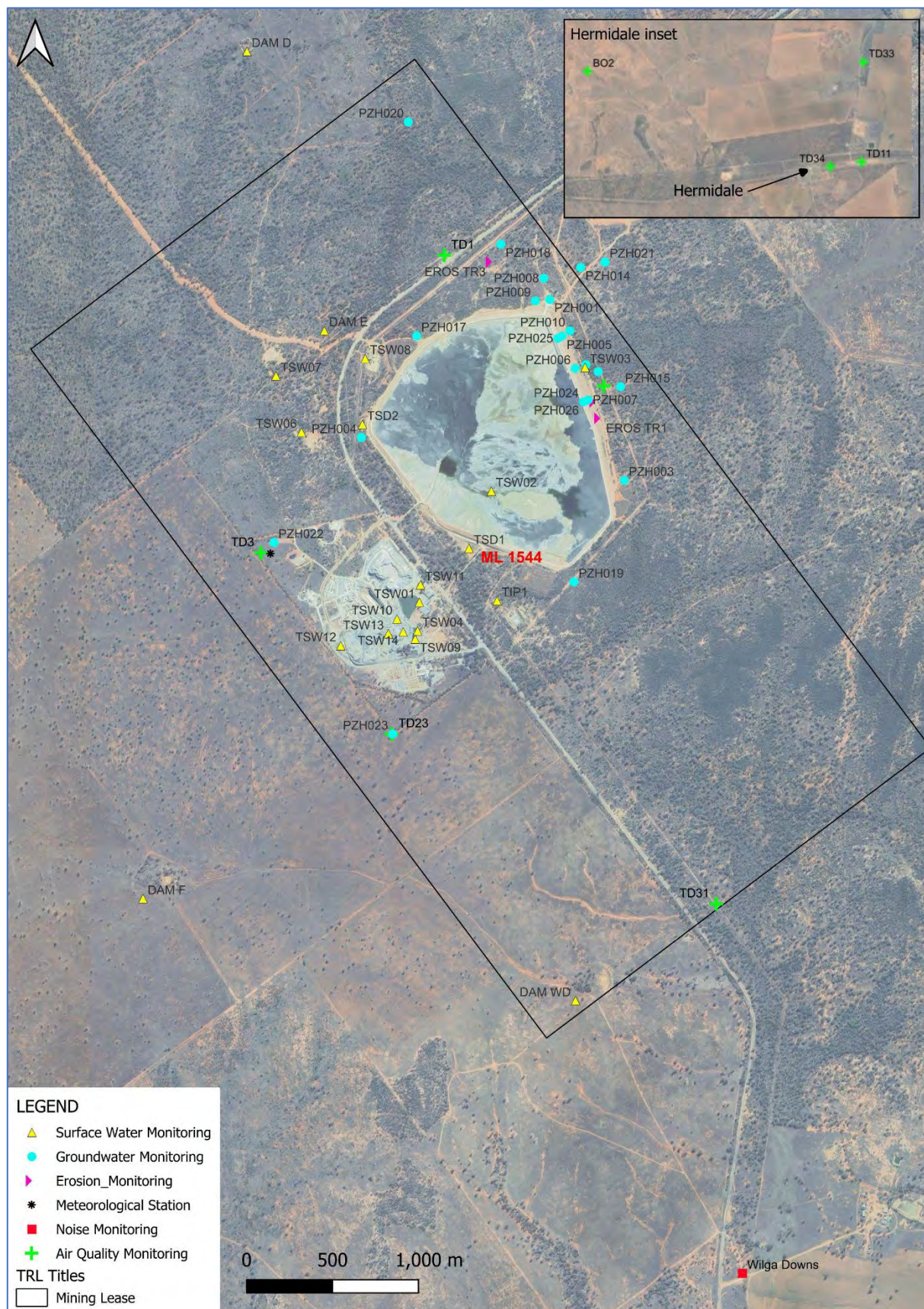
The purpose of routine data review is to identify any non-compliances or trends as early as possible to allow prompt investigation and correction (if required). Annual summaries of monitoring data and associated trends will be presented in the Annual Reviews (where relevant) and where required published on the company website.

Table 6 Environmental Monitoring Summary

Management Plan	Monitoring Program	Parameter
Meteorology	Informs all monitoring programs	Wind speed (metres per second) and direction (degrees) at 10 metres Temperature (degrees Celsius) at 2 and 10 metres Sigma theta at 10 metres (degrees) Solar radiation (watts per square metre) Rainfall (millimetres).
Air Quality and Greenhouse Gas Management Plan	Air Quality Monitoring Program	Deposition Dust Monitoring
Noise and Vibration Management Plan	Noise Monitoring program	Noise emissions (sensitive receivers). Blast Monitoring (ground vibration and blast overpressure)
TRL Water Management Plan Constellation Project Water Management Plan	Surface Water Monitoring Program	Water quality Water extraction / use / transfers / water balance Erosion
	Ground Water Monitoring Program	Ground water quality Ground water depth Groundwater take
TRL Water Management Plan TRL Waste Management Plan	Monitoring associated with the TCM Tailings Storage Facility	Dam Safety monitoring Water Quality Ground Water Quality Ground water depth

Environmental Management Strategy

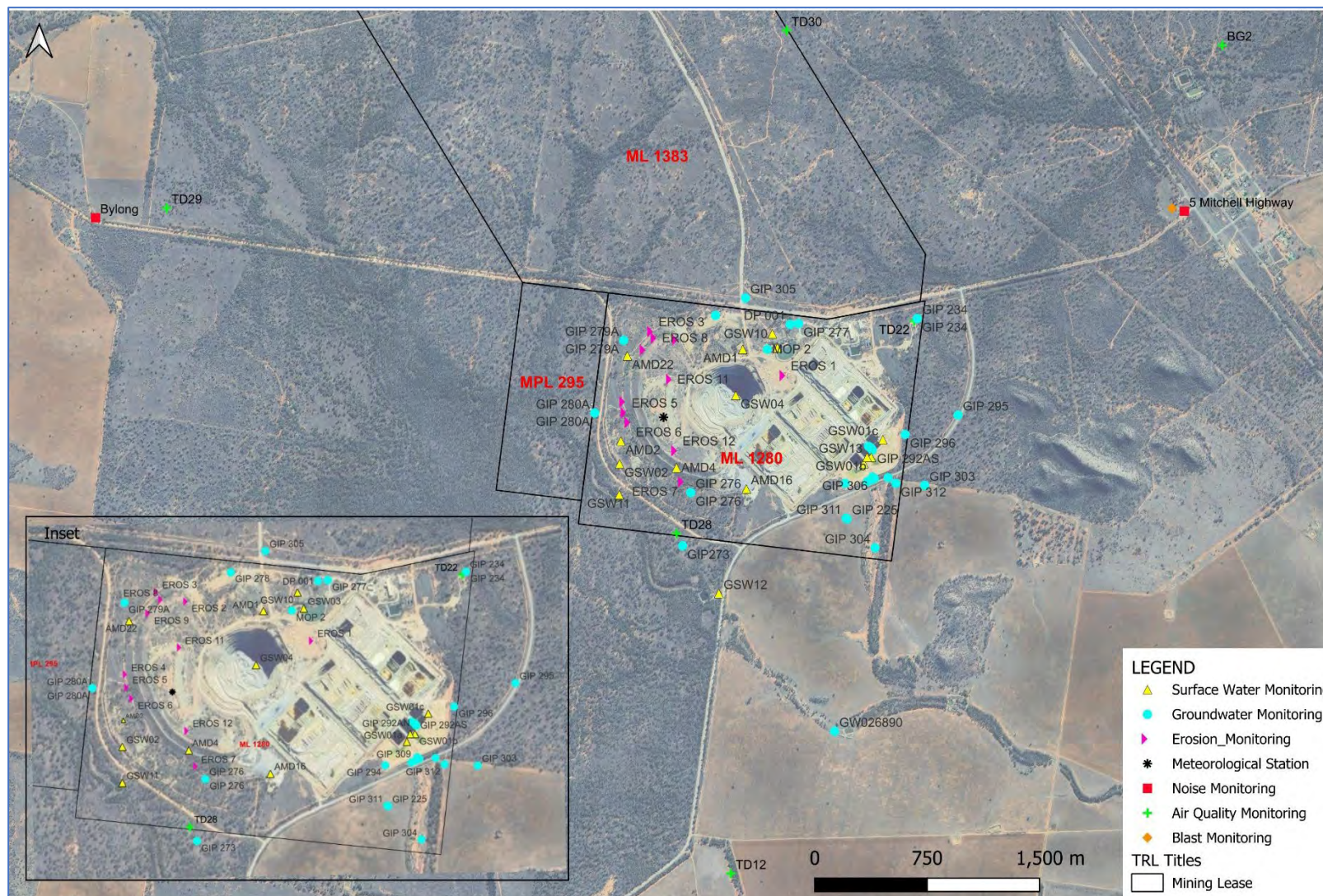
Figure 11 Tritton Monitoring Overview



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Environmental Management Strategy

Figure 12 Murrawombie Monitoring Overview



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Aeris
RESOURCES
TRITTON OPERATIONS

LEGEND

- ▲ Surface Water Monitoring
- Groundwater Monitoring
- * Meteorological Station
- Noise Monitoring
- + Air Quality Monitoring
- ◆ Blast Monitoring

TRL Titles

- Mining Lease

0 1 2 km

Avondale

Glendale

ML 1818

ML 1383

ATV1

ATV4

ATV5

TD15

TD30

BG2

GNR 001, GNR 002, GNR 003, GNR 004, GNR 005, GNR 006, GNR 007, GNR 008, GNR 009, GNR 010, GNR 011, GNR 012

NEP001, NEP002, NEP003

AMD7, AMD8, AMD9, AMD10, AMD11, AMD12, AMD13, AMD15, AMD17, AMD18, AMD19, AMD20, AMD21

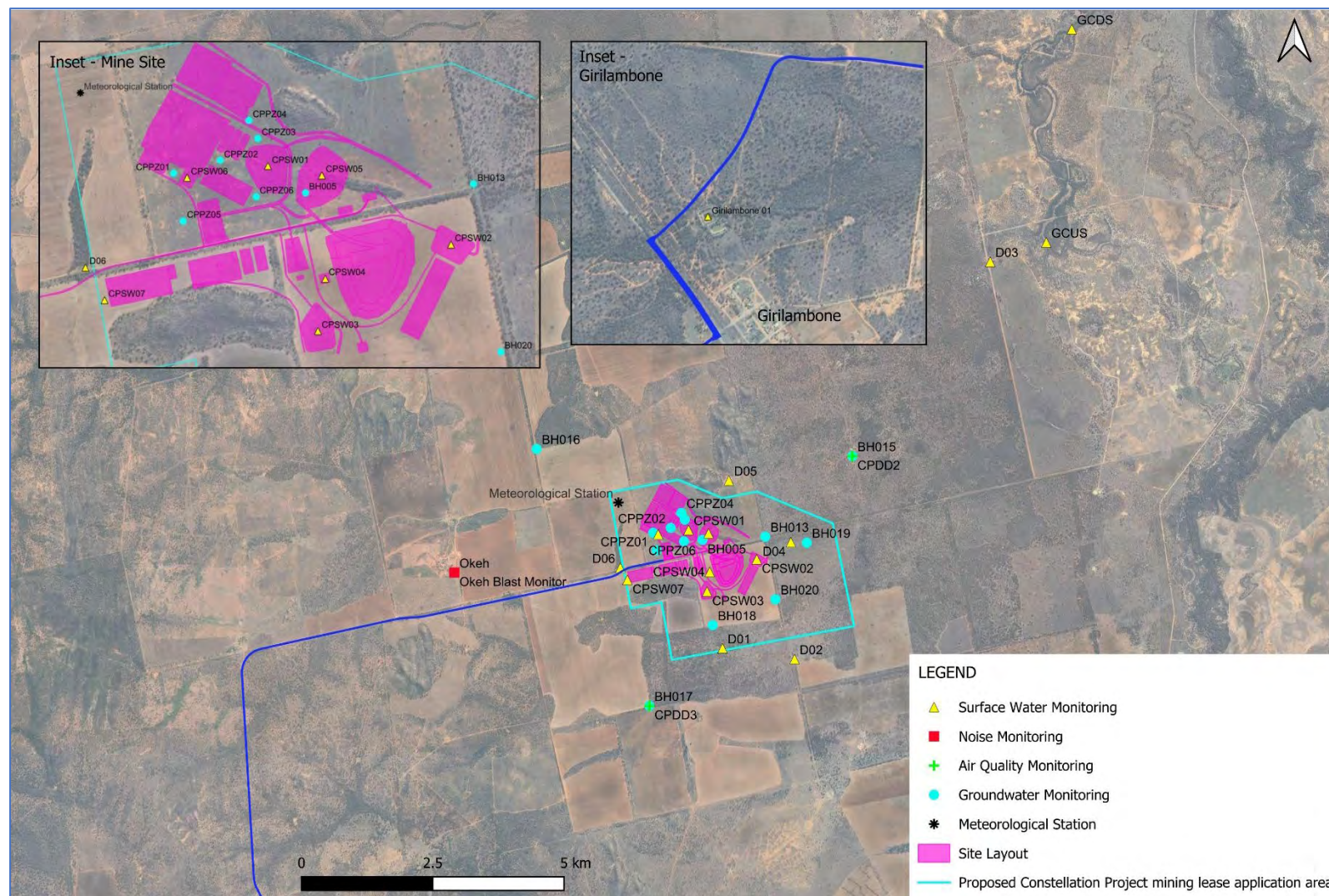
GSW05, GSW06, GSW09

Inset

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Figure 14 Constellation Project monitoring overview



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6.2. Incident Reporting

The definitions of an 'incident' and 'material harm,' as defined under the TCM Development Consent (DA 41/98), the Constellation Project Development Consent (SSD-41579871) and the POEO Act are outlined below (noting that the most comprehensive definition from these sources has been stated).

Incident:

An occurrence or set of circumstances that causes, or threatens to cause material harm and which may or may not be or cause a non-compliance.

Environment (Development Consents)

Includes all aspects of the surroundings of humans, whether affecting any human as an individual or in his or her social groupings.

Environment (POEO Act)

Environment means components of the earth, including—

- *(a) land, air, and water, and*
- *(b) any layer of the atmosphere, and*
- *(c) any organic or inorganic matter and any living organism, and*
- *(d) human-made or modified structures and areas,*

and includes interacting natural ecosystems that include components referred to in paragraphs (a)–(c).

Harm (POEO Act)

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

Material harm (Sn 147 POEO Act):

Harm to the environment is material if—

- *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*
- *loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Where an event meets the definition of material harm, it is deemed to be a 'reportable incident,' that must be reported to the relevant regulatory authority as stated below:

- **DPHI**

Immediately to DPHI as per Condition 7 of the TCM Development Consent (DA 41/98) or within 24 hours as required by Condition D2 of the Constellation Project Development Consent (SSD-41579871) (via the major projects portal).

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The notification must identify the development (including the development application number and name) and set out the location and nature of the incident including:

- o the date, time and location;
- o a brief description of what occurred and why it has been classified as an incident;
- o a description of what immediate steps were taken in relation to the incident; and
- o identifying a contact person for further communication regarding the incident.

In accordance with Condition D3 of the Constellation Project Development Consent (SSD-41579871) TRL will provide the Department with a subsequent incident report in accordance with Appendix 7 of the Constellation Project Development Consent (SSD-41579871) (Incident Notification and Reporting Requirements).

- **Bogan Shire Council**

At the earliest opportunity, any incident that has caused, or threatens to cause material harm to the environment must be reported to Bogan Shire Council (and any other relevant agency) as per Condition C7 of the ATP Development Consent (DA 10/2015/004/003).

For any other incident associated with the development, Bogan Shire Council (and any other relevant agency) will be notified as soon as practicable.

Within seven days of the date of the incident, the applicant shall provide Bogan Shire Council and any other relevant agency with a detailed report on the incident (and such further reports that may be requested).

- **Environment Protection Authority**

Immediately after becoming aware (Condition R2 of Environment Protection licences 4501 and 11254) via the Environment Line on 131 555.

The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act

For the purpose of this EMS, TRL will apply the above requirements and definitions in the following way:

- For the purpose of entering into INX, conducting investigations, and developing mitigation and preventative actions, TRL will initially consider all emergencies, incidents (immediate unwanted events such as spills etc), non-compliances and community complaints as 'events.'
- 'Events' (as noted in point 1 above) that meet the above definition of 'causing or threatens to cause material harm' will be deemed 'reportable incidents' and require immediate reporting as per development consent and EPL requirements. TRL will utilise its incident classification system, based on the potential or actual consequence and likelihood of an event, to determine whether an event has, or threatens to cause material harm to the environment).

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- Immediately means ‘promptly and without delay’ following the gathering of sufficient basic information to make the report and following the initiation and/or implementation of any immediate measures to prevent further environmental or community harm.
- All incidents that meet the definition of material harm will be reported to the relevant agencies, regardless of whether reporting is specified in the respective development consent.

6.3. Non Compliance Management

The definition of a “non-compliance,” as defined under the TCM Development Consent (DA 41/98) and the Constellation Project Development Consent (SSD-41579871) is:

‘An occurrence, set of circumstances or development that is a breach of this consent but is not an incident.’

A protocol for managing and reporting non-compliances with statutory requirements has been developed as a component of this EMS and is described below.

Compliance with all approvals, plans and procedures is the responsibility of all personnel (staff and contractors) employed by TRL. Non-compliances may be identified through a number of means including:

- inspections;
- reports from staff and contractors;
- internal and independent audits;
- events / incidents; and/or
- review of monitoring data and comparison against set limits.

Any identified non-compliances will be entered into INX as an ‘event’ where the non-compliance is investigated and where basic and root causes are determined. The investigation will develop corrective and preventative actions which are assigned to relevant personnel and tracked through to completion. Should the non-compliance meet the definition of material harm, it will also be reported as a ‘reportable incident’ (Section 6.20)

Depending on the nature of the non-compliance, TRL may engage the services of technical specialists or consult with regulatory agencies to assist in identifying and implementing corrective measures.

Condition 7A of the TCM Development Consent (DA 41/98) and Condition D1 of the Constellation Project Development Consent (SSD-41579871) requires that *‘within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must:*

- *be in writing;*
- *be submitted via the NSW planning portal (Major Projects);*
- *identify the development (including the development application number and name);*
- *set out the condition of this consent that the development is non-compliant with;*
- *describe why it does not comply;*

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- *describe the reasons for the non-compliance (if known); and*
- *describe what actions have been undertaken, or will be undertaken and when, to address the non-compliance.'*

Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

While only the TCM and Constellation Project Development Consents requires the reporting of non-compliances, TRL will notify all relevant agencies, regardless of whether reporting is specified in the respective development consent (including the provision of a report within 7 days of becoming aware of the non-compliance).

In addition, a summary of non-compliances, as related to the specific development consents will be included in the TCM, ATP or Constellation Project Annual Reviews.

Standard Mine Lease Condition 18 (Schedule 8A of the Mining Amendment Regulation) requires the reporting of any non-compliance with a condition of a mining lease, or a requirement of the Mining Act or Mining Amendment Regulation relating to activities conducted on a mining lease in NSW. In accordance with Standard Mining Lease Condition 18 (Schedule 8A of the Mining Amendment Regulation) the report will be made within seven days of becoming aware of the non-compliance. The report will include information as required by Standard Mining Lease Condition 18(3) (Schedule 8A of the Mining Amendment Regulation).

6.4. Event Investigation

All identified 'events' (incidents, near misses, non-compliance, complaints etc) are investigated using TRL internal procedures and protocols to identify basic and root causes (using the ICAM⁶ framework), implement actions to mitigate impacts and to prevent recurrence. All events are entered into INX and assessed using the TRL risk matrix. Identified corrective measures are assigned (as an action) to the appropriate TRL employee and tracked through to completion. INX includes notification and escalation of any overdue actions.

6.5. Evaluation of Compliance

TRL has established processes for evaluating whether operations are compliant with required consent conditions, other legislation, and commitments. Methods are presented below in Table 7.

⁶ ICAM - Incident Cause Analysis Method

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Table 7 Evaluation of compliance methods

Part of EMS Framework	Evaluation Methods
Review of the TRL 'Legal and Other Obligations' Register	The TRL 'Legal and Other Obligations' Register is described in Section 5.4. On a periodic basis, the Environmental Superintendent reviews the register, the purpose of which is identify any non-compliances, or an increasing risk of a non-compliance occurring.
Inspection Programs	Inspection programs are further outlined below in Section 6.5.1.
Environmental Monitoring programs	A summary of environmental monitoring is included in Section 6.1. Further detail regarding the frequent review of monitoring data is included in the respective strategy or management plan.
Internal Audits	Internal audits are further outlined below in Section 6.5.2.
Independent Environmental Audits	Independent Environmental Audits are further outlined below in Section 6.5.3.
Event / incident reporting and investigation	Event / incident reporting and investigation is described in Section 6.20.
Management Review	Management Review is further described in Section 7

6.5.1. Environmental Inspections

Environmental Inspections are conducted on a routine basis across the five operational mine sites associated with the TRL. The purpose of the inspections are to ensure compliance with TRL approvals and commitments.

Inspections focus on general environment risk mitigation including:

- hydrocarbon and chemical storage;
- waste management;
- housekeeping;
- noise and dust emissions;
- drainage and water management;
- property management including weeds, pests, erosion etc;
- rehabilitation success; and
- other aspects.

A schedule of Inspections is maintained by TRL. All inspections are documented, and any identified corrective actions are assigned to the relevant area owner for completion. Further detail regarding the range of inspections conducted and inspection frequency are included in management plans (Section 5.8).

6.5.2. Internal Audits

Internal audits are conducted on an ad-hoc basis and may be targeted at certain sites or aspects of the mining operations. Internal audits are generally conducted to identify potential non-compliances, at risk areas / situations and improvement opportunities, allowing TRL to implement corrective and continuous improvement measures / initiatives.

Any identified corrective actions are assigned to the relevant area owner for completion.

6.5.3. Independent Environmental Audits

Condition 8 of the TCM Development Consent (DA 41/98) and Condition C8 of the ATP Development Consent (DA 10/2015/004/003) and Condition D5 of the Constellation Project Development Consent (SSD-41579871) require the undertaking of independent environmental audits.

6.5.3.1. Tritton Copper Mine

Audits are required to be undertaken on a three yearly basis⁷. The formal audit component (i.e. 'site visit') must be completed as per the following schedule:

- 30 September 2027
- 30 September 2030

TRL will implement the specific measures as outlined in Condition 8:

- TRL will commission and pay the full cost of an Independent Environmental Audit of the development. The audit will:
 - o be prepared in accordance with the relevant Independent Audit Post Approval requirements;
 - o be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
 - o be carried out in consultation with the relevant agencies;
 - o assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
 - o recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Within three months of commencing the audit, a copy of the audit report will be submitted to the Secretary (via the major Projects Portal) along with TRL's response to any findings, including a timetable to rectify any identified recommendations.

A summary of the audit report will be included in Annual Reviews and a copy placed (including TRL's response to findings) on the Company website.

The audit will be based on the TCM Development Consent and not include any other mining operations.

⁷ The most recent TCM Independent Environmental Audit was conducted in October 2024 by Barnett and May (Barnett and May 2025) and is available on the Aeris Resources website.

The undertaking of Independent Compliance Audits are included in the TRL legal Register.

6.5.3.2. Avoca Tank Project

Audits are required to be undertaken within two years of the date of commissioning of the development, and every three years thereafter, unless Council directs otherwise. Bogan Shire Council were advised that the Avoca Tank project was commissioned on 25 May 2023; as such, scheduled audits must be completed by:

- June 2025 (Complete)⁸
- 25 May 2028
- 25 May 2031

TRL will implement the specific measures as outlined in Condition C8 of the ATP Development Consent (DA 10/2015/004/003), including alignment with relevant department guidelines as required.

Within three months of commissioning the audit, a copy of the audit report will be submitted to Bogan Shire Council along with TRL's response to any recommendations in the report.

A summary of the audit report will be included in Annual Reviews and a copy placed (including TRL's response to findings) on the Company website.

The audit will be based on ATP Development Consent, however, may include some aspects of the North East Copper Mine due to shared infrastructure. The scope of the audit will be agreed with the auditor prior to commencement.

6.5.3.3. Constellation Project

Condition D5 of the Constellation Project Development Consent (SSD-41579871) requires that independent audits are conducted in accordance with the *Independent Audit Post Approval Requirements* published on the Department's website (DPIE 2020). DPPHI requires that audits (for the Constellation project) are conducted at the frequencies stipulated in Table 8.

Table 8 Independent Audit Frequency

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.
Closure / Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.
The timeframes above include completion of all activities required in undertaking an Independent Audit.		

⁸ The most recent Independent Environmental Audit for the ATP was conducted in May 2025 by GHD (GHD 2025)

The undertaking of Independent Environmental Audits for the above sites are included in the TRL legal and Other Obligations Register.

TRL will provide a written response to either DPHI or Bogan Shire Council (depending on the audit conducted) to any audit findings and any identified opportunities for improvement. Required corrective measures will be entered into INX and assigned for implementation; where required the Site Risk Register (TRL-HSET-RAS-0006), Legal and Other Obligations Register (TRL-HSET-REG-0002) and Works program schedule will be updated to ensure the corrective measures are being tracked to completion. Where required, audit findings will be reflected in the relevant strategy or management plan, as stated in Section 5.8.1.

6.6. Records Management

TRL maintains and retains records for the purpose of demonstrating compliance, tracking environmental performance, and providing a historic record of the various operations.

Records include, but are not limited to:

- monitoring data and laboratory reports;
- calibration records for monitoring equipment;
- incident reports and investigation records;
- training records;
- audit and inspection reports;
- management review minutes;
- regulatory correspondence;
- complaints and stakeholder communication records; and
- annual Review reports

TRL retain a range of hard copy and electronic records:

- Hard copy records are kept in a secure location. An established filing / index system is used to enable the efficient retrieval of records.
- Electronic records are stored on secure, backed-up servers with appropriate access controls.

Records are retained for a minimum of 5 years, however TRL intend to retain important records in perpetuity.

6.7. Complaints Management

Condition C1(f(ii)) of the ATP Development Consent (DA 10/2015/004/003) requires the EMS to include procedures to receive, handle, respond to and record complaints.

In addition, Condition M5 of EPL 11254 (Tritton Copper Mine) and Condition G2 of EPL 4501 (Murrawombie, North East and Avoca Tank Project Mines) require the operation of a 24-hour telephone complaints line for the purpose of:

- (Condition M5 EPL 11254) receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant.

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The telephone complaints line is 1800 935 999 (email: tritton.community@aerisresources.com.au)

- (Condition G2 EPL 4501) enabling the EPA to directly contact one or more representatives of the licensee who can:
 - o respond at all times to incidents relating to the premises; and
 - o to contact the licensee's senior employees or agents authorised at all times to:
 - speak on behalf of the licensee; and
 - provide any information or document required under the licence.

The dedicated role for the EPA to contact at TRL is the HSET Manager.

All complaints are recorded in a commercial Community Complaints Database (Consultation Manager®). The record will include the following detail in accordance with Condition M4.2 of EPL4501 and EPL11254:

- a) the date and time of the complaint;
- b) the method by which the complaint was made;
- c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- d) the nature of the complaint;
- e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- f) if no action was taken by the licensee, the reasons why no action was taken.

The complaint is also registered in INX as an 'event' and investigated to determine the basic cause and devise corrective / preventative measures.

The process for managing and responding to community complaints is presented below:

1. The Community Relations Officer will forward the complaint to the relevant area owner (as related to the aspect or nature of the complaint) for investigation / provision of a response.
2. Where a rapid response and rectification is possible, the matter will be corrected, and the Community Relations Officer will contact the complainant and advise that the matter is corrected (including any measures to prevent re-occurrence).
3. Where further investigation is required, the Community Relations Officer will contact the complainant and advise that the complaint has been received and is under investigation and advise a timeframe for when it is expected a response can be provided.
4. When the investigation is complete, when corrective measures are implemented, or on the day when the response was to be provided, the Community Relations Officer will contact the complainant and advise that the matter is corrected (including any measures to prevent re-occurrence) or provide an updated timeframe for when it is expected a response can be provided.
5. The community complaints register, and INX are updated with actions taken to resolve the complaint, and the date the complaint was resolved.

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TRL will provide a summary of community complaints received, updated on a monthly basis on the Company website.

6.7.1. Dispute Resolution

Condition C1(f(iii)) of the ATP Development Consent (DA 10/2015/004/003) requires the EMS to include procedures to resolve any disputes that may arise.

The Community Relations Officer will work with subject matter experts and the TRL SLT to resolve disputes with community members as quickly as possible.

Where complaints cannot be resolved to the satisfaction of both parties; parties may elect to engage a mediator, at TRL's expense, to help them to reach a mutually agreed written resolution. The mediator must be accredited under the National Mediator Accreditation System.

If the dispute cannot be resolved between the two parties, either party may refer the matter to the General Manager of Bogan Shire Council or Planning Secretary (depending on the operational site that the dispute may be related to) for resolution.

7. MANAGEMENT REVIEW

The TRL Senior Leadership Team (at the TRL SLT Meeting) will be kept informed regarding environmental aspects, risks, and environmental performance of the operational sites through the following processes:

- A review of environmental performance will be included in regular TRL SLT meetings including:
 - o environmental incidents;
 - o community complaints;
 - o tracking against key environmental and community metrics, objectives and targets; and
 - o tracking any overdue actions (Legal and Other Obligations Register and / or Works Program Schedule).
- Review and approval of:
 - o the Annual Review (including programs / initiatives / actions for continuous improvement, emerging trends from environmental monitoring data);
 - o objectives and targets proposed for the upcoming year (or other period);
 - o strategies and management plans (including reviews and updates);
 - o Environmental 'Legal and Other Obligations' Register;
 - o the Environment Risk Register; and
 - o responses to audit findings.

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The TRL SLT meets on a weekly basis. Any required improvement measures, or corrective actions arising from the review of the TRL environmental performance are assigned and recorded at the meeting and tracked through to completion.

7.1. Continuous Improvement

Continuous improvement is a key aspect of the TRL Environmental Management Framework. Potential continuous improvement opportunities are identified through:

- the Management Review process;
- internal and external audits;
- incident investigations and near-miss reports;
- review of monitoring data and trends;
- assessment against established objectives and targets;
- benchmarking against industry best practices; and
- technological advancements and emerging issues.

Where improvements are identified:

- objectives and targets are developed / updated;
- strategies and management plans are updated to incorporate the improvement measures;
- strategies and management plans are approved by TRL Management in accordance with TRL delegation of authority;
- updated strategies and plans are distributed to risk and control owners;
- 'operational control (procedures and other supporting) documents are updated and issued; and
- performance is tracked and reviewed.

These aspects are implemented in accordance with internal procedures.

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- NSW Resources Regulator (2021) Form and Way Rehabilitation Management Plan for Large Mines (updated February 2024)

⁹ Previously the NSW Department of Urban Affairs and Planning

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Appendix A - Aeris Resources Sustainability Policy Statement

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Sustainability Policy Statement

Aeris Resources Limited

As at 1/6/2023

At Aeris Resources, we acknowledge that mining can have a significant impact on the environment and communities in which we operate. As a responsible corporate citizen, we are committed to conducting our operations in a manner that minimises our impact on the environment, promotes the well-being of our employees and local communities and ensures the long-term sustainability and continuity of our business.

To ensure we operate sustainably and profitably, we will adopt and implement a coordinated approach to sustainability, supported by robust systems and processes. Our approach is founded on not only ensuring legislative compliance, but also seeking to set and transparently report on objectives and targets to continually improve environmental and stakeholder outcomes.

Our approach to operating sustainably to create and protect value for stakeholders is underpinned by the overarching principle of *'good for business, good for others'*.

Our core sustainability principals are:

1. Identify, analyse and manage sustainability-related risks and opportunities through application of our Risk Management Framework.
2. Integrate management planning for the sustainability-related risks and opportunities into the company strategic and business planning cycle.
3. Engage with our stakeholders in a respectful, open and honest manner, in all cases upholding ethical business practices and complying with all applicable legal requirements.
4. Engage with Indigenous Peoples to develop and strengthen relationships. We will consult with Indigenous Peoples on how to manage the impacts of our operations on Indigenous cultural heritage, in accordance with agreed plans and arrangements.
5. Through the attraction and retention of the "right people" and creating a safe and respectful working environment we will build a workforce that represents the communities in which we operate and provides a platform for our people to do their best.
6. Contribute to the conservation of biodiversity by implementing integrated approaches to land use planning and environmental management in areas affected by our operations.
7. Monitor the regulatory and policy landscape relating to sustainability to implement processes to comply with requirements as they arise.
8. Establish processes to identify opportunities to improve energy and water efficiency, reduce waste, reduce and manage emissions and where practicable, embracing clean energy technologies.
9. Promote awareness of sustainability and sustainable practices to strengthen capabilities and skillset within our workforce.

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Having regard to the industry in which we operate, the geographic locations of our operations, and our stakeholders, we will assess and periodically review the actual and potential impacts of our operations over various time horizons. This will facilitate the prioritisation of the topics that are material to the enterprise value of Aeris and its impact on the economy, environment and people and leaving a positive legacy for future generations.

Integrating our principles and our approach to sustainable development into our strategic objectives and targets will enable us to deliver positive economic, environmental and social outcomes whilst also producing and providing minerals critical to a world transitioning to a renewable future.

This Policy works in conjunction with all other Aeris Policies and is supported by implementation frameworks at the operating level.

A handwritten signature in black ink, appearing to read "Andre Labuschagne".

Andre Labuschagne
Executive Chairman

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