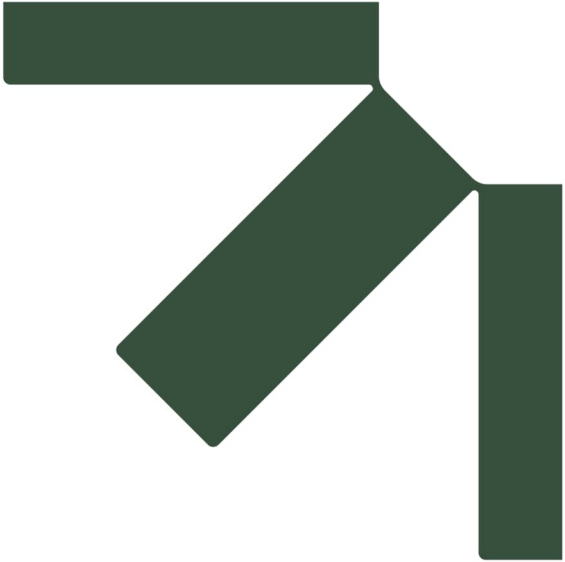




Attachment 4 Environmental Policy

Casuarina South Precinct Residential Development - Lots 110, 111, 108 and 114 Lugg Place

EPBC Act Referral Form

316 Property Developments Pty Ltd and 316 Property Group Pty Ltd

SLR Project No.: 675.073556.00001

CORPORATE ENVIRONMENTAL MANAGEMENT FRAMEWORK

A practical commitment from site selection to project handover

DRAFT
FOR BOARD APPROVAL

22 JUNE 2026

OUR COMMITMENT

316 Developments Pty Ltd and 316 Property Group Pty Ltd (together, “316”) develop and manage property. We recognise that our decisions can affect land, water, plants, animals, neighbours and future communities. We are committed to sound environmental practice and to managing our operations so harmful impacts are avoided where possible, minimised where they cannot be avoided, and properly managed, rehabilitated or offset where required.

We will meet applicable Commonwealth, State and local requirements, approval conditions and written commitments. This framework is our corporate minimum; every project must also follow its own approvals, technical reports and management plans.

WHO IT COVERS	All directors, employees, project managers, consultants and contractors working for, or on behalf of, 316 on property acquisition, planning, approvals, construction, land management and handover.
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OUR DECISION RULE

1 AVOID Change the location, layout, timing or method so the impact does not occur.	2 MINIMISE Reduce the area, duration or intensity of impacts that cannot reasonably be avoided.	3 RESTORE Repair, stabilise or rehabilitate affected areas as work progresses and at close-out.	4 OFFSET Where required, protect or restore environmental values elsewhere for significant residual impacts.
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SIX PRACTICAL COMMITMENTS

1. Understand before acting Use qualified advice and current information to identify environmental values and risks, including native vegetation, fauna habitat, wetlands, groundwater, soils, contamination, heritage and bushfire.	2. Design around what matters Consider environmental constraints early. Retain important vegetation, habitat, trees, buffers and water functions where practicable, and compare reasonable alternatives before fixing a layout.
3. Control work on the ground Set clear work boundaries and no-go areas; manage clearing, weeds, plant disease, erosion, dust, noise, waste, stormwater and spills; and stop work if an unexpected risk is found.	4. Use competent people Engage suitably qualified consultants and contractors, give them clear scopes and responsibilities, and require them to follow approvals, plans and site instructions.
5. Keep evidence and speak up Maintain approvals, risk, inspection, monitoring, incident and corrective-action records. Report material issues promptly and communicate honestly with regulators and affected stakeholders.	6. Finish what we start Complete required rehabilitation, monitoring, handover and environmental offset commitments, then review results and improve future projects.

WHAT THIS MEANS IN PRACTICE

APPROVALS FIRST No clearing or site work starts until required approvals, plans and responsibilities are confirmed.	PROTECT WHAT STAYS Retained areas are shown on drawings, marked on site and protected from accidental access or damage.	FOLLOW THROUGH Monitoring, rehabilitation, reporting and offset duties are budgeted, assigned and tracked to completion.
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HOW WE PUT THE FRAMEWORK INTO PRACTICE

PLAN • DO • CHECK • IMPROVE

Project controls from acquisition to handover

STAGE	WHAT 316 WILL DO	MINIMUM RECORD / CONTROL
1	Investigate Before acquiring or committing to a site, complete proportionate environmental due diligence and identify approvals, seasonal survey needs and material "stop" risks.	Due-diligence note; constraints plan; initial approvals and risk register.
2	Plan & design Bring environmental specialists into planning early. Compare alternatives and show how the layout follows the avoid-minimise-restore-offset decision rule.	Current technical studies; design decisions log; environmental risk register.
3	Approve & prepare Obtain required approvals before work starts. Translate approval conditions into project scopes, budgets, drawings and project-specific management plans.	Approvals register; conditions tracker; management plans; contractor clauses.
4	Construct & manage Induct workers, mark boundaries and no-go areas, carry out pre-clearing checks, inspect controls, manage incidents and keep work within the approved footprint.	Induction and inspection records; photographs; monitoring data; incident and corrective-action register.
5	Close, restore & report Complete rehabilitation and make-good work that is required, meet offset and monitoring commitments, close conditions and hand over ongoing obligations clearly.	Close-out report; regulator reporting; rehabilitation / offset records; formal handover.

ACCOUNTABILITY

Board / Directors Set the tone, approve this framework, provide reasonable resources and review material environmental risks and incidents. General Manager / Project Lead Keep project risks, approvals, actions and responsibilities current; appoint competent advisers; and escalate material issues promptly. Consultants / Contractors Work within approved plans and boundaries, follow site controls, keep required records and immediately report unexpected finds, damage, spills or non-compliance.	STOP • MAKE SAFE • REPORT Anyone working for 316 must stop work when there is a serious or unexpected environmental risk, suspected breach, spill, heritage find, fauna injury or work outside an approved area. Make the area safe, tell the project lead, obtain specialist advice where needed, and only restart when authorised.
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ASSURANCE, REPORTING AND REVIEW

Material incidents, breaches and overdue approval actions will be reported to a Director promptly. Corrective actions will be assigned, tracked and closed. Project performance will be checked at key approval, construction and handover stages. This framework will be reviewed at least every two years, or sooner after a material incident, significant legal change or major change to 316's operations.

DOCUMENT OWNER	General Manager	APPROVED BY	Board of Directors
EFFECTIVE DATE	Upon Board approval	REVIEW CYCLE	At least every two years

OUR STANDARD: UNDERSTAND BEFORE ACTING • WORK WITHIN APPROVALS • FIX PROBLEMS PROMPTLY • LEAVE A CLEAR RECORD