



Environmental Management System Standard

Atlas Environmental Operations

30/01/2025

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Authorisation

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Abbreviations

ALARP	As Low As Reasonably Practicable
AS/NZS	Australian/New Zealand Standard
DBCA	Department of Biodiversity, Conservation and Attractions
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEMIRS	Department of Energy, Mines, Industry Regulation and Safety
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA	Environmental Protection Authority
EPBC	Environment Protection and Biodiversity Conservation Act 1999
ERP	Emergency Response Plan
HSE	Health, Safety, and Environment
HSEC	Health, Safety, Environment, and Community
ISO	International Organization for Standardisation



1 Environmental Management System

1.1 Management System Design

Atlas is committed to minimising harm to the environment and leaving an enduring positive legacy in the communities in which it operates. Atlas considers excellence in environmental management essential to our future. This commitment is documented in the Atlas Environment Policy (**Error! Reference source not found.**).

Atlas conducts business in accordance with our five core values (Table 1-1). These values reinforce our culture, guide our behaviours and help to articulate the way we approach all aspects of our business.

Table 1-1: Atlas Values

Excellence	Whether looking at safety, sustainability, marketing, mining operations, haulage or port a commitment to excellence shines through in everything we do.
Indomitable Spirit	Our indomitable spirit is who we are. We are resilient, determined, courageous and passionate people who thrive on thinking outside the box.
Win-Win	Think win-win is our approach across our operations to achieve mutually beneficial outcomes. We value and respect each other so that together we accomplish more.
Agility	Agility is at the heart of what makes us different. We pride ourselves on being adaptable and nimble due to our lean structure and unique operating model.
Trust	We earn the trust with our people, suppliers, customers and communities by being fair and always acting with integrity.

The Atlas' Environmental Management System (EMS) has been designed in accordance with the requirements AS/NZS ISO 14001:2016 and is depicted in Figure 1-1.



Figure 1-1: Environmental Management System



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2 Risk Identification Throughout the Life of the Project

2.1 Planning

Planning for environmental management starts with a risk assessment process to define key risk exposures. The planning process involves an understanding of relevant environmental aspects, impacts and legal requirements along with the development of objectives, targets, plans and procedures.

2.2 Risk Assessment

In all of its activities Atlas is committed to managing risk to ALARP.

Environmental risk has been assessed for this Project as per the Atlas HSE Group Risk and Hazard Management Standard (950-HS-STA-0024) and is consistent with the Australian Standard for Risk Management AS ISO 31000:2018.

The risk assessment document (Environmental Risk Register) will be made available on site during the life of the project. The Environmental Risk Register will be reviewed and updated on a biannual basis by the site Environmental Advisor and on an annual basis by the site Management Team.

2.3 Implementing Environmental Management Programs

The Sanjiv Ridge Environmental Management Plan (EMP) (179-LAH-EN-PLN-0003) defines Atlas' approach to environmental management and integrates regulatory and EMS requirements.

The plan is applicable to Atlas employees, contractors and visitors.

3 Incorporating Goals and Targets, and Legal Obligations

3.1 Environmental Objectives and Targets

Site environmental objectives/outcomes and targets will be developed and reviewed on a regular basis to ensure targets are on track for completion. Objectives/ outcomes and targets will be:

- Specific.
- Measurable.
- Achievable.
- Relevant.
- Time bound.

In addition, the site environmental objectives/outcomes and targets will be consistent with the Environment Policy, consider relevant legislation and align to the HSEC Business Plan.

3.2 Legal and Other Requirements

Understanding and documenting legal and other obligations is critical to achieving compliance. The site specific environmental legal and other obligations register includes, but is not limited to:

- Mining Proposal commitments.
- Mine Closure Plan commitments.
- Prescribed Premises Works Approval and Licence conditions.
- Water Abstraction Licence conditions.
- Ministerial Statement conditions.
- Native Vegetation Clearing Permit.



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- EPBC Act Approval conditions.
- Tenement conditions.
- Heritage commitments and conditions.
- Health Act approval conditions.

The environmental legal and other obligations register will be reviewed on an annual basis and updated as required. The evaluation of compliance process will be mapped to the obligations register and undertaken via audits and inspections.

A summary of environmental legislation relevant to the project business is detailed in the HSE Legal and Other Register.

Current copies of applicable licences / permits will be maintained on site.

4 Structure and Responsibility

The Site Senior Executive will be responsible for ensuring all activities associated with the Project are undertaken in full compliance with statutory regulations and are consistent with Atlas's Health, Safety and Environmental Policy.

Environmental management responsibilities for all employees and contractors are summarised in Table 4-1 and detailed in the EMP. Specific responsibilities are incorporated into position descriptions where applicable.

Table 4-1: Environmental Management Responsibilities

Role	Responsibility
Chief Executive Officer	Overall responsibility for the Sanjiv Ridge Project.
General Manager – Operations	Ultimate responsibility for the successful completion and closure of the Project, including adequate closure provisioning.
Site Senior Executive	Overall responsibility for site-specific implementation of environmental policy, systems and management measures. Ensure that all contractors fulfil their contractual obligations with regards to environmental requirements. Sign-off on Ground Disturbance permits. Management of the action register. Successful completion and closure of the Project, including adequate financial provisioning.

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Role	Responsibility
Environmental Advisor	<p>Ensure the environmental component of the EMS is implemented and maintained.</p> <p>Monitor and review contractor compliance to contract and legislative requirements.</p> <p>Implement induction procedures and appropriate training.</p> <p>Ensure compliance with licence conditions and company policy via the establishment and maintenance of appropriate reporting systems and databases.</p> <p>Undertake environmental monitoring as required.</p> <p>Undertake environmental inspections and audits as required.</p> <p>Provide environmental advice as required to other Project personnel.</p> <p>Signoff on and set conditions on Ground Disturbance Permits.</p>
Mine Geologist	<p>Ascertain whether fibrous asbestiform minerals are present in ore and coordinate the management of asbestiform minerals with respect to its environmental and health responsibilities.</p>
Mine Engineer	<p>Ensure that mineral wastes are dumped in appropriate locations according to its lithological characteristics.</p>
Site Surveyors	<p>Conduct regular surveys of the topsoil storage areas and areas of disturbance to facilitate audits against approved ground disturbance permits. Provide data to be used in rehabilitation planning and monitoring.</p>
Contractor Managers	<p>Work with the Environmental Advisor to ensure compliance to regulatory and contractual requirements.</p> <p>Support and promote key issues regarding environmental management within the mine site and ensure that personnel implement requirements of the EMP where relevant.</p>
All Contractors and Personnel	<p>Adhere to the procedures outlined in the EMP where relevant.</p> <p>Provide assistance in implementing the EMP and report any non-compliance to their respective manager.</p> <p>Correct use of the incident reporting system.</p>

The Site Senior Executive will liaise with the Environment and Approvals team regarding any environmental incident/issue that requires external notification to the environmental regulatory body.

5 Training

5.1 Site Induction

Atlas employees and contractors are required to attend a site induction addressing environmental management requirements and responsibilities prior to commencing duties. Environmental information covered includes:

- Environment Policy.
- Our Values.
- HSE Management System.
- Legal responsibilities and requirements.
- Significant risks.
- Conservation significant flora and fauna and their habitats.



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- Heritage matters.
- Procedures for reporting incidents.

All personnel (employees and contractors) are required to attend the site induction and acceptance of their environmental responsibilities is done by way of signing the register of attendance.

5.2 Site Training and Awareness Sessions

In addition to the site specific induction, further environmental training may be developed for specific tasks carried out by the workforce; this will be detailed in the site Training Needs Analysis.

Environmental information is also communicated via toolbox sessions.

5.3 Training Records

Training records are to be maintained and filed in accordance with Atlas requirements.

5.4 Contractors

Contractors and suppliers will be selected and engaged in accordance with the Contractor HSE Requirements Manual (950-HS-MAN-0001). Only those who have been evaluated and deemed acceptable by Atlas will be engaged to perform contract works or provide services or/and supplies.

All Contractors will be required to comply with the Atlas EMS.

Atlas staff will liaise with suppliers and contractors on a regular basis to ensure environmental compliance to legal and other obligations. Contractors are required to consider environmental aspects during the preparation of a task specific job safety analyses for all work carried out.

Wherever practicable, the environmental impact of goods and services will be considered at the time of procurement and less hazardous alternatives to hazardous substances considered.

6 Operational Control (Procedures)

Atlas has been operating iron ore mines in the Pilbara since 2008. During this time Atlas has developed, implemented and refined its Environmental Management Plans and Procedures.

The Environmental Management documentation is regularly reviewed and updated with relevant information. Documentation is required to be revised in the following instances:

- A new approval being issued with new conditions/requirements.
- Changes to existing approvals/conditions.
- Changes to legislation.
- The result of high potential or reoccurring environmental incidents.
- As a result of an investigation into an environmental incident.

All plans and procedures are managed through Atlas's Document Control System to ensure adequate tracking and management of a document metadata to ensure consistent:

- Document numbering.
- Document revisions.
- Dating.
- Status.



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7 Monitoring and Management of Performance

7.1 Inspections

Environmental inspections are undertaken to:

- Ensure appropriate risk control measures are in place.
- Proactively identify environmental hazards.
- Identify any non-compliance with legal or other requirements.

The Site Senior Executive will ensure environmental inspections are undertaken, documented and resulting actions are closed out. The frequency of inspection will depend on the magnitude of risk associated with the aspect.

The environmental inspection schedule will be documented in the site Environmental Activity Schedule / Planner. The environmental monitoring requirements for each site are also detailed in the Environmental Activity Schedule.

Should calibration of equipment be required, this shall be performed in accordance with the manufacturer recommendations.

Prior to using environmental monitoring equipment, relevant personnel are instructed on the correct handling and use of the equipment to ensure measurements are accurate and prevent damage to equipment.

7.2 Audits

An Audit Schedule will be developed for the Project and include detail on the required frequency of environmental audits to be performed during the course of the Project.

Corrective and preventative actions resulting from audits are recorded in the site action register.

8 Non-compliances and Corrective Actions

8.1 Environmental Incidents and Complaints

All environmental incidents are reported, investigated and entered into the site event reporting database (InControl) as per the Event Management Procedure (950-HS-PRO-0016).

All environmental incidents which require external notification will be reported to the Site Senior Executive (or delegate) as soon as practicable. The Site Senior Executive will liaise with the Environmental Advisor to coordinate the external reporting to the relevant regulatory body.

Any complaints received onsite will be documented and reported to the Site Senior Executive as soon as practical.

8.2 Emergency Response

The Project Emergency Response Plan (ERP) will include responses to environmental emergencies. The ERP shall include responsibilities, contact details, and contact details of emergency services. The Emergency Response Plan will be made available and accessible to all personnel.

The ERP will be tested through biannual emergency response drills, and this will include at least one mock emergency with a potential environmental impact annually.

Training in emergency response procedures will be provided as per the site Training Needs Analysis.



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8.3 Corrective Actions Management

The site action register will be used to ensure effective tracking and closure of all action items. Action items may be generated from audits, inspections, non-conformances, incident findings and hazard near-miss reports.

The Site Senior Executive will be responsible for the management of the action register. Any item that has been entered into the action register will remain an action item until it has been addressed to the satisfaction of the Site Senior Executive.

9 Internal and External Reporting of Performance

9.1 Internal Reporting

Internal reporting is mainly based around incident reporting events. Internal reporting occurs as set out in Table 9-1.

Table 9-1: Internal Reporting

Timing	Details
As reported	All environmental incidents are forwarded to the appropriate direct line manager and escalated as appropriate up the managerial chain.
Daily	A summary of incidents reported in the previous 24 hours is emailed to all appropriate personnel
Weekly	A High Potential or Recordable/Reportable Incident Summary is prepared and emailed to appropriate personnel. The report provides a summary of all incidents classified as having high or extreme potential risk or those where an Incident occurred which is externally reportable.
Monthly	A HSE end of month report summarises all environmental incidents for the month, environmental milestones achieved during the month and update on develops into the HSE Management System, including notification of any amendments to environmental documentation.

9.2 External Reporting

Atlas maintains a reporting register of all reporting requirements. The register is continually updated as new approvals are received, and reporting conditions are applied to the Project. Table 9-2 summarises the expected reporting requirements for the Project, these may vary depending on approvals received and legislative requirements.

Table 9-2: External Reporting Requirements for Sanjiv Ridge

Reporting Source	Government Agency	Type	Frequency
Mining Act 1978 – Tenement Condition	DEMIRS	Annual Environment Report	Annually
Mining Act 1978 – Tenement Condition	DEMIRS	Incident or performance criterion breach	As required
Mining Rehabilitation Fund Regulations 2013	DEMIRS	Disturbance and Rehabilitation Data	Annually



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Reporting Source	Government Agency	Type	Frequency
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	DCCEEW	Compliance Report	Annually
<i>Environmental Protection Act 1986 – Ministerial Statements</i>	EPA	Compliance Assessment Report	Annually
<i>Environmental Protection Act 1986 – Part V Works Approval</i>	DWER	Environmental Compliance Report	60 calendar days of crusher construction completion (Completed)
<i>Environmental Protection Act 1986 – Part V Works Approval</i>	DWER	Time Limited Operations Report	30 calendar days of completion of Time Limited Operations or 90 calendar days prior to expiration of the Works Approval (Completed)
<i>Environmental Protection Act 1986 – Part V Licence</i>	DWER	Annual Audit Compliance report	Annually
<i>Environmental Protection Act 1986 – Part V Licence</i>	DWER	Annual Environment Report	Annually
Environmental Protection (Unauthorised Discharge) Regulations 2004	DWER	Unauthorised discharge report	As required
<i>Rights in Water and Irrigation Act 1914</i>	DWER	Annual Water Report	Annually
<i>Biodiversity Conservation Act 2016</i>	DBCA	Fauna Survey Return Report	Within one month of licence expiry
<i>Biodiversity Conservation Act 2016</i>	DBCA	Fauna Report Form	As required

10 Keeping Records

Atlas has two essential databases that maintain effective control of all required environmental records. They are:

- InControl – an incident reporting database that records, tracks and manages incident reporting, investigation and action management as a result of incidents reported at any of Atlas' sites.
- Electronic storage system – storing all documents.

A summary of specific environmental records that are maintained are listed below:

- Approval documents.
- Environmental risk register.
- Environmental legal and other obligations register.
- Environmental objectives/outcomes and targets.
- Induction attendance.
- Training needs analysis.



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- Training records.
- Stakeholder consultation.
- Environmental Incidents and investigations.
- External reporting schedule.
- Monitoring schedule.

11 Auditing Performance

Environmental audits will be performed during the course of the Project. An Audit Schedule will be maintained which will contain further information regarding areas of audits and the frequency of environmental audits.

Corrective and preventative actions resulting from audits will be recorded in the site action register.

11.1 Continual Improvement

The Atlas EMS is periodically reviewed to reflect continuous improvements and legislative changes. Approved modifications resulting from reviews are integrated into the management system and actively communicated to promote consistent, best practice standards and continual improvement across all our operations.

The Atlas EMP will be reviewed annually or whenever there is a significant change to the scope of the works.

11.2 Change Management

Atlas recognises that significant hazards can be created when changes are implemented in the business or on site. These include but are not limited to:

- Equipment changes.
- Legislative changes.
- Procedural changes.
- Personnel changes.

The Atlas Iron Change Management Standard (950-CR-STA-0001) will be implemented, and environmental aspects will be considered for every change.

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Appendix A. Atlas Environment Policy



ENVIRONMENT POLICY

Purpose

Atlas commits to responsible and efficient environmental management and performance.

Policy Statement

Atlas commits to:

- Compliance with applicable environmental legislation and other regulatory requirements through our Environmental Management System.
- Committed to increased knowledge and understanding of biodiversity values across our operations through baseline assessments and environmental management for protection of biodiversity.
- Continual improvement in environmental management through innovation, technology, and long-term planning.
- Work proactively and collaboratively with all contractors to ensure Atlas' environmental legal and other requirements are visible and managed in their processes.
- Foster environmental awareness in our employees and contractors through environmental inductions, training, and awareness programs.
- To identify, assess and mitigate environmental risks across all phases of our operations and ensure operations are conducted in an environmentally sustainable manner.
- Execution of rehabilitation commitments outlined within approved mine closure plans.
- Promote efficient use of natural resources, minimising waste and investigating cleaner energy options across our operations.

Gerhard Veldsman
Chief Executive Officer
Date: February 2024