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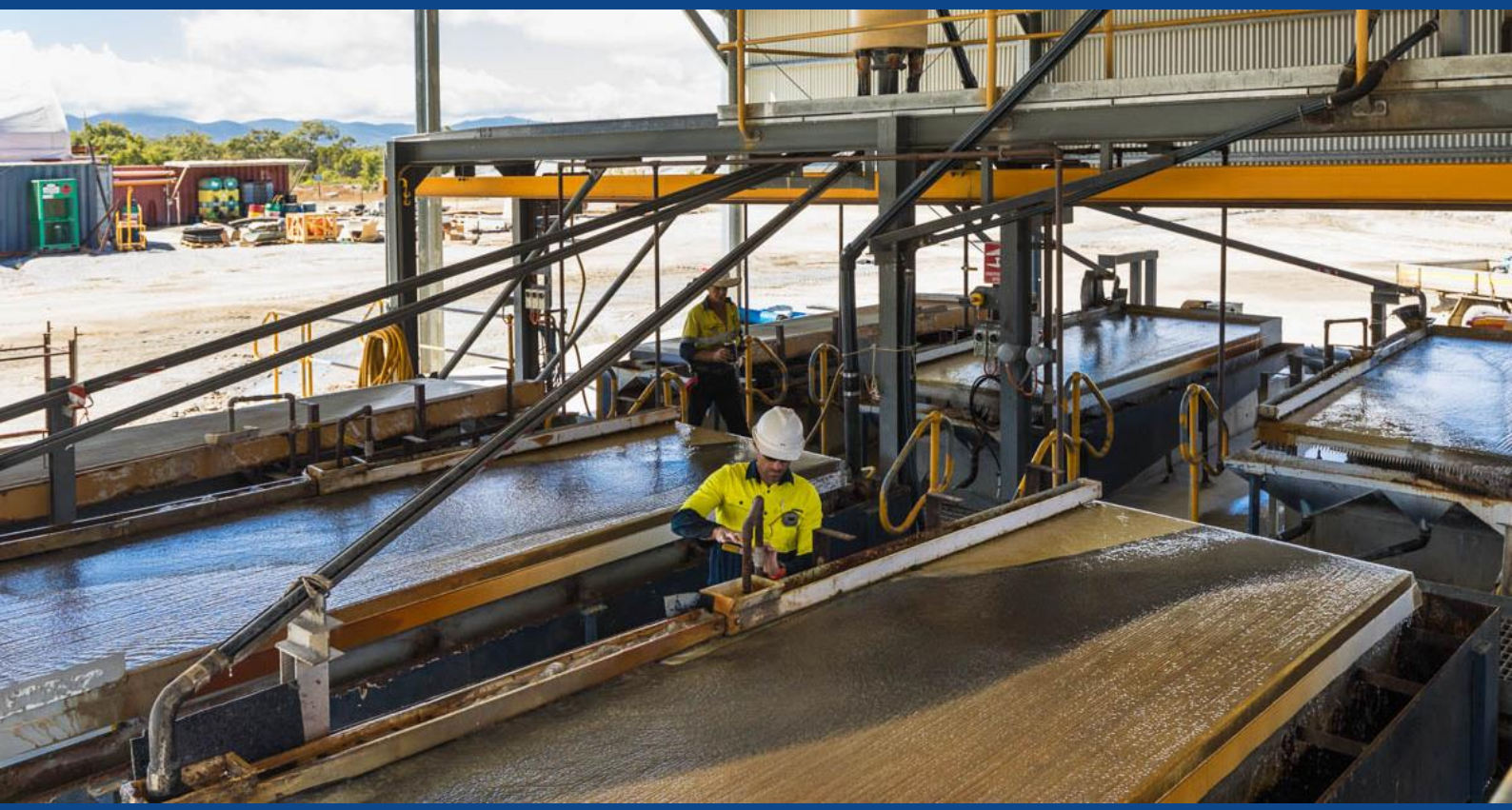

MT CARBINE BANKABLE FEASIBILITY STUDY

CHAPTER 8: OPERATIONS MANAGEMENT

DECEMBER 2021

Document History

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1. Introduction

1.1. Context

This Chapter 8: Operations Management shall be read in conjunction with Chapter 1: Executive Summary and additional references as listed in Section 7.

1.2. Purpose

The purpose of Chapter 8: Operations Management is to define the operating philosophy and systems that underpin the approach to operations used as the basis to develop the feasibility study.

2. Operating Philosophy

The Mt Carbine site is a mature operating site that has been running since the gravity plant started hot commissioning in February 2020. The EQR CEO is involved through strategically guiding the operation and Company from an explorer to a fully-fledged operation. The EQR CEO has over 30 years' of experience in managing mining operations through North America, Europe, and Africa. This experience has aided the development of a cohesive hands-on management approach and operations team development and restricted the reporting chain to ensure employees are empowered in their roles for efficient decision making and optimal outcomes.

The management team from the CEO down are based on site at the established offices, this ensures prompt decision making and gives the management team the ability and willingness to work together relying on the skills provided by each of the individuals making up the management team.

Senior management are all very experienced, each with development and operational experience in the mining industry.

EQR is an equal opportunity employer with support for bullying and harassment in the workplace as it works to build a team of skilled individuals from surrounding communities. The operation has an extensive Health and Safety Management system that protects employee's physical safety.

The operations are guided by the Integrated Management System (IMS) which addresses the intended outcomes of ISO 9001:2015 Quality Management Systems, ISO 14001:2015 Environmental Management Systems and IOS 45001:2018 Occupational Health and Safety Management Systems. The application of the Integrated Management System Manual (IMSM) will:

- Demonstrate EQR's ability to consistently provide quality quarry products that meets customer requirements and tungsten concentrate to meet the requirements of CRONIMET Australia and its downstream customers;
- Enhance customer satisfaction;
- Enhance environmental performance;
- Continually improve occupational safety and health;
- Achieve legal and other requirements; and
- Deliver on quality, environment, safety, and health objectives.

The IMS Manual is provided in **Error! Reference source not found.** for reference.

2.1. Operations

2.1.1. Current Operating Philosophy (Phase 1)

The expansion of operations under the ongoing early works program will see the site mainly owner operated to ensure optimal running efficiency of the equipment and to ensure a low-cost base for the operations due to the focus on the LGS mining and processing. Specialty jobs will be contracted so that EQR does not have to retain these skill sets on a full-time basis.

The Early Works Program will ensure that processing capacities reach the targeted production levels using a combination of historic equipment and selected new capital purchases.

All operators and operations supervisors and management are engaged directly by Mt Carbine Retreatment Management Pty Ltd. Prior to the open pit mining operations commencing while development is completed, operational focus will be on the LGS which is a simplified mining methodology whereby the mined LGS material is delivered to the dry processing plant (crushing and screening). The LGS mining will take place on a day shift only basis while the dry processing plant, XRT Sorting (Sorting) and gravity processing plant will operate on a 24/7 roster.

Operations team employment has been increasing in line with the required processing capacities and roster changes and will have sufficient skilled personnel available to operate the processing plants as required.

Strategic contractors are engaged for speciality jobs to occur at site or should specialty jobs need to occur at off-site locations. Due to the ongoing operations at site, relationships are in place with key contractors which complete regular work on site. Some core examples are as follows:

- High Voltage Electrical – Woodburn Electrical (Cairns);
- General Electrical Maintenance or Capital Projects – Jason Cummings Electrical (Atherton);
- Speciality Fabrication and Welding – Savannah Steel Fabricators & DTR Welding Services (Mareeba);
- Hydraulics – FNQ Hydraulic Services (Julatten), Hydraulink (Mareeba); and
- Heavy Machinery – Toddy's Machinery Maintenance (Cairns).

With the ongoing operations, there is continuous maintenance planning and ongoing jobs taking place. EQR has found it best to outsource capital project jobs or sustaining capital projects to relevant contractors and where required external project management. This allows maintenance teams, production, and management to focus on the operational requirements while sustaining capital projects are completed as needed by external contractors.

2.1.2. Future Operations (Phase 2)

The operating philosophy for Mt Carbine at completion of the Project will split between owner-operated and contract operated.

The open pit mining inclusive of drill and blast will be contract mined. The reasoning for this is that the skill requirement for the mining is outside of EQR's core capability, and to retain a lean organisational chart, contract mining was deemed to be the most sensible approach for the operations.

Given the inherent interrelation between the open pit mining and the LGS mining (a constant feed to the crushing and screening plant is required, though the source between the LGS and the open pit will alternate to suit the mine plan), the mining of the low-grade stockpiles will also be included in the open pit contract miner's responsibilities.

The battery limit for the contract mining will be the discharge of the run of mine (ROM) material either in the crushing and screening plant feed bin or adjacent. The basis of the feasibility study has allowed for the crushing and screening plant to be owner operated. If commercial benefits are identified in shifting to a contracting crushing and screening operation this option may be pursued in the future.

The gravity processing plant circuitry and operating philosophy remains largely unchanged and the operating philosophy for this reason will also remain unchanged. The gravity processing plant operating time will increase from week on-week off to full time operations, so the manning will increase, but the operating philosophy and shift and management structure will remain the same.

EQR will retain responsibility for the overall safety of the site through the Site Senior Executive (SSE) and the Company's IMS as a guiding document for the site. EQR will also be responsible for the development of the quarterly mine and production planning along with the ore quality management. All these costs have been accounted for in the EQR financial modelling. More detailed mine planning will be the responsibility of the contract miner appointed at the relevant time in the future. EQR has started engaging multiple contractors for the mining of the open pit based on the information provided by DAS Mining Solutions and their pit optimisation modelling completed with this study.

2.2. Maintenance

The full-time maintenance team will comprise of the following positions:

- 1 x Maintenance Superintendent;
- 1 x Maintenance Foreman;

- 2 x Fitter;
- 1 x Boiler Maker;
- 1 x Boiler Maker Apprentice; and
- 2 x Electricians.

2.2.1. Mining

All maintenance on the mining equipment shall be the responsibility of the mining contractor. Mining equipment owned by EQR shall be provided for use free of charge to the contractor. The contractor shall be responsible for the maintenance of the free issued equipment in accordance with an approved maintenance schedule.

Until the mining contractor takes on the maintenance of the heavy earth moving equipment, a maintenance contractor will continue to complete heavy vehicle maintenance at site, working 2-3 days at site each week while the LGS mining is ongoing. This arrangement has been proven to work as it is currently being used on site.

2.2.2. Crushing, Screening and Processing

The day-to-day maintenance of the crushing and screening plant and the gravity processing plant will largely be undertaken by the maintenance team that is on site on a full-time basis. The team is highly skilled in the repair and maintenance of the plant and equipment and are currently providing all standard maintenance for the crushing, screening, and gravity processing plant.

Preventative Maintenance will be completed on an ongoing basis with each section of the processing plants, crushing and screening, sorting and the gravity plant receiving a planned 12hr shut down weekly to undertake required maintenance tasks. Any specialty jobs will have the relevant contractor brought in to complete the work. Capital projects will be outsourced to contractors as and when required to ensure the maintenance team stay focused on the maintenance of the crushing and screening plant.

Foreman and shift supervisors keep records of required maintenance jobs leading up to the planned shut down and discuss requirements leading up to the shut-down to ensure job completion is maximised. Each down day also has the maintenance team complete an inspection checklist of the equipment to ensure all issues are identified, allocated a breakdown risk rating and either dealt with immediately or kept on file for planning/inclusion during the next planned shutdown.

To manage the maintenance at the Mt Carbine operations, EQR has taken out a subscription on the FIIX Maintenance Management software, this provides for the detailed tracking of maintenance and inventory for the site along with cost allocations to the plant and equipment used by the mine and associated analysis and reporting.

2.2.3. Mobile Machinery

Mobile machinery will be serviced at regular hour service intervals of 250, 500, 1,000, 2,000, 3,000, 5,000 and 6,000. This will be completed by an external service provider such as Toddy's Machinery Maintenance that specialises in work of this nature. A service schedule will be put in place to ensure work is completed according to required scheduled service intervals to maximise life of machines and their continued operational capabilities.

2.3. Transport and Logistics

The mine is located at 6888 Mulligan Highway, Mt Carbine which is easily accessible from all main ports, rail heads and cities. The highway is completely sealed and in good condition. As the mine is currently operational, supply chains and strong relationships have been setup with all major suppliers for equipment on site and ongoing spares required.

Transport of oversize equipment to site is easily achievable as evidenced by the delivery of the earth moving fleet delivered by CRONIMET in September 2021.

Relationships with multiple logistics suppliers have been developed depending on the size of the item/parcel/load being delivered to the site or taken away from the site.

The concentrate produced at site is loaded into bulk bags, sealed and sold ex-gate at Mt Carbine. The concentrate is then transported via truck, by others, to the Townsville Port for export. Other Ports available for use are the Port in Mackay and Brisbane. Therefore, there are several major ports available to use for any international shipments.

The Cairns airport is approximately a 2-hour drive from site and is easily accessible for either people or freight deliveries. Due to the site being in Far North Queensland, spares are often flown into Cairns or Townsville and trucked to Mareeba as a central distribution point.

2.4. Procurement and Supply

Accounts have been setup with all major suppliers as the operation has been running for nearly two years through its pilot phase operations. Relationships and supply chains required for the operation have been established with a secure supply of parts and consumables required for ongoing operations.

The operation is relatively simplistic in nature and therefore no complicated sourcing of materials is foreseen by the operations team. The site is seen as semi-remote as it is approximately a 1-hour drive from a major township, therefore, planning is required for some of the more mine specific items as major transporters only deliver 3-days per week or for the items that are not be held in stock in Mareeba or Cairns.

With the industrial support base of Far North Queensland industry, it has been found that operationally, most spare parts can be delivered within a 24-hour period should a rush order be required. All deliveries are made via sealed highway, with no access issues to the site for oversized deliveries.

3. Organisational Structure

The organisational structure for the site sees the CEO of EQR as the Officer of the Mine Operators reporting into the Board of Directors of the associated companies. The SSE is responsible of all health, safety, environment, and operational matters for the site. Administration and technical services report to the CEO directly for non-site related work, all work on site by the technical services team will fall under the Integrated Management System for the site and will report to the SSE. The management and operations reporting structure is summarised in Figure 1, Figure 2 and Figure 3.

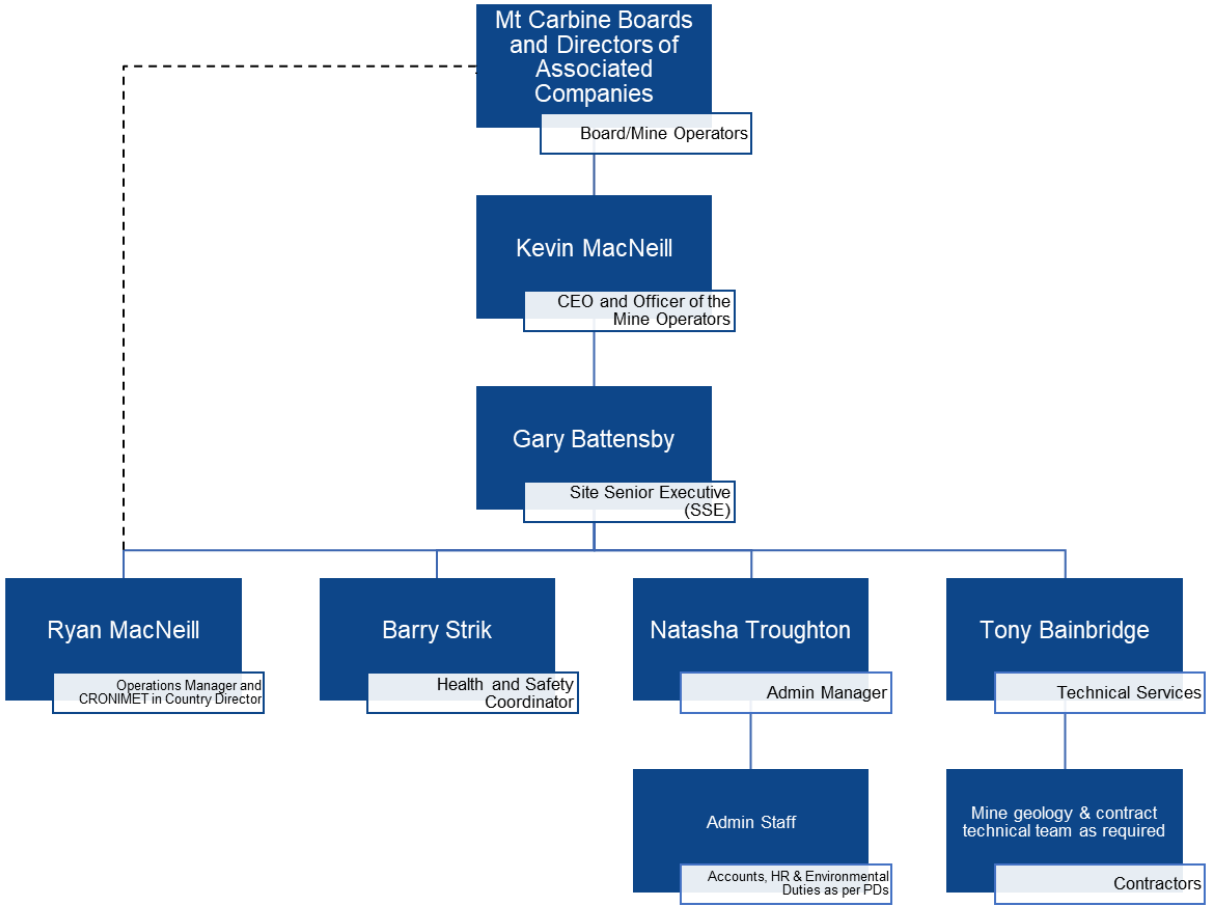


Figure 1: Mt Carbine Operation Organisational Chart

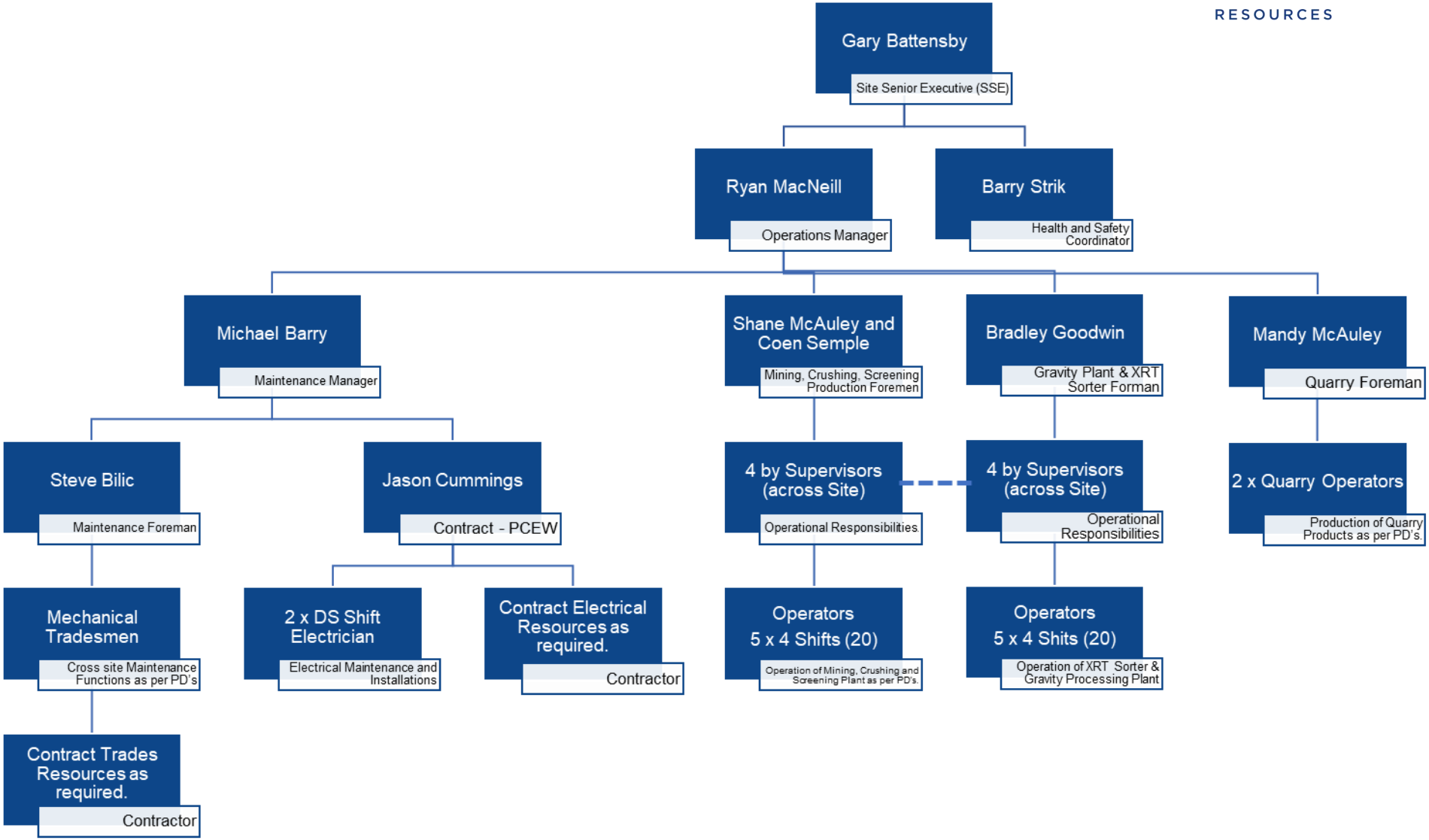


Figure 2: Operations Roster for LGS (only) Mining & Processing

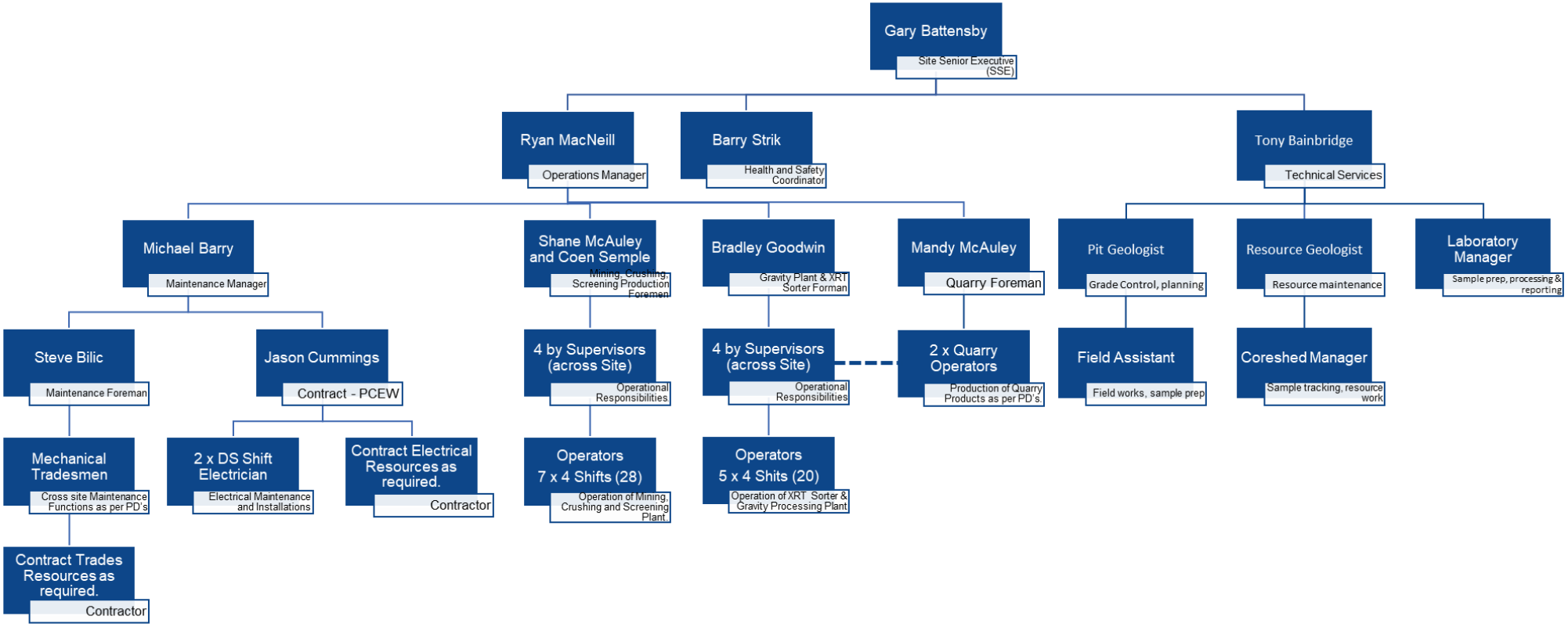


Figure 3: Operations Roster for LGS, Open Cut Mining & Processing

4. Operations Roster

The Operations Roster states the shift and leave cycles and demonstrate the impact of the cycles on productivity, ability to attract the required workforce, lost time, and costs. The operating cycles should be benchmarked against current local practice and international best practice.

4.1. Phase 1 – Low Grade Stockpile Only

4.1.1. Mining & Hauling

Mining of the LGS will take place on a day shift only basis. This will see one excavator load 3 x Bell B50 ADTs. The roster for the mining and hauling crews will be on an even time roster of 7 days on and 7 days off working 12-hour day shifts only. There will be two crews working on this roster.

4.1.2. Crushing, Screening, Hauling, XRT Sorting & Gravity Plant Operations

The crush, screen, sorting operations will operate on a 24/7 basis. This shift rotation will operate on an even time roster with four crews cycling. The roster is setup to give each crew, two weekends per month at home allowing employees the opportunity to spend time at family events over the weekends. The roster sees each crew work either four or five 12hr shifts which will be split between day and night shifts as seen in the picture below. The roster will be the same for both the crushing/screening/hauling and the gravity plant operations respectively, each with dedicated crew for the respective operations.

4.2. Phase 2 – Open Cut & Low-Grade Stockpile Mining

4.2.1. Mining & Hauling

Mining will move to a 24/7 operation changing between the open pit mining and the LGS. This will see one excavator load three Bell B50 articulated dump trucks on a continuous basis. The mining teams will move on to the same roster as the processing plant at this point, which is an even time roster. The roster sees each crew work either four or five 12hr shifts which will be split between day and night shifts as seen in Figure 5 below.

4.2.2. Crushing, Screening, hauling, XRT Sorting & Gravity Plant Operations

The crushing, screening and sorting operations will operate on a 24/7 basis. This shift rotation will not change for Phase 2 and will continue to operate on an even time roster with four crews cycling. The roster is setup to give each crew, two weekends per month at home allowing employees the opportunity to spend time at family events over the weekends. The roster sees each crew work either four or five 12hr shifts which will be split between day and night shifts as seen in Figure 5 below. The roster will be the same for both the crushing/screening/hauling and the gravity plant operations respectively, each with dedicated crews for the respective operations.

PRODUCTION CREWS - ROSTERING					
	A - Supervisor	B - Supervisor	C - Supervisor	D - Supervisor	2021
Fri			D	N	29-Oct
Sat			D	N	30-Oct
Sun			D	N	31-Oct
Mon		D	N		1-Nov
Tue		D	N		2-Nov
Wed	D	N			3-Nov
Thu	D	N			4-Nov
Fri	N			D	5-Nov
Sat	N			D	6-Nov
Sun	N			D	7-Nov
Mon			D	N	8-Nov
Tue			D	N	9-Nov
Wed		D	N		10-Nov
Thu		D	N		11-Nov
Fri	D	N			12-Nov
Sat	D	N			13-Nov
Sun	D	N			14-Nov
Mon	N			D	15-Nov
Tue	N			D	16-Nov
Wed			D	N	17-Nov
Thu			D	N	18-Nov
Fri		D	N		19-Nov
Sat		D	N		20-Nov
Sun		D	N		21-Nov
Mon	D	N			22-Nov
Tue	D	N			23-Nov
Wed	N			D	24-Nov
Thu	N			D	25-Nov
Fri			D	N	26-Nov
Sat			D	N	27-Nov
Sun			D	N	28-Nov
Mon		D	N		29-Nov

Figure 4: Mt Carbine Operations Roster (Example)

5. Administration

The administration for the project will continue to operate under the Corporate Services team led by the Administration Manager in a holistically similar manner regarding the current systems and protocols in place for ongoing operations. Going forward, EQR will employ an additional accountant to support the current staff contingent with the Corporate Services team operating on an 8hr per day, 5-days per week basis. EQR has established accounting and procurement systems and service providers to satisfy all requirements.

To increase the efficiency of the administrative processes, the FIIX Maintenance Management system being used by EQR has a streamlined system for the procurement management process from inventory on hand through new ordering and supply chain management. The automation of this process will continue to streamline administrative processes and reduce any further administrative burden of a larger operation.

The Corporate Services team are all trained in the use of MYOB, the corporate system, setup and its use daily. The transition to a larger scale operation will be simple due to all administrative infrastructure being setup and fully operational.

Some administrative services such as audit and specialty HR jobs are outsourced to relevant professional service firms such as Nexia or HR Dynamics that EQR works with on an ongoing and regular basis.

6. Operations

As the project is already operational, it has demonstrated it has the systems and management capacity in place to actively produce tungsten concentrates and quarry products on an ongoing basis. The coming months will see the finalisation of the Phase 1 crushing and screening plant which is an upgrade of the current electrical infrastructure and the installation of a large wet screening plant which will expand processing throughput capacities and will be the operational processing plant until the new processing plant as set out in this document is constructed and installed accordingly.

The Phase 1 processing plant will focus on the processing of material from the LGS while the new crushing and screening plant is constructed, and the gravity plant upgrades are installed. Once the Phase 2 plant is ready, the operations will swap to the new crushing plant.

6.1. Marketing

6.1.1. Product Specification

Based on the off-take agreement in place between CRONIMET Australia Pty Ltd, CRONIMET Asia Pte Ltd and Mt Carbine Retreatment Pty Ltd (a wholly owned subsidiary of EQR that hold a 50% interest in the incorporated joint venture with CRONIMET Australia Pty Ltd) in 2019, the specifications for tungsten concentrate are summarised in Table 1:

Table 1: Product Specification

Name of Element	Product Specification
WO_3	50% min
S	1.5% max
Sn	0.50% max
Mo	0.40% max
Sb	1.0% max
As	0.15% max
H2O	1.0% max
Radioactivity	≤1,000 bq/kg

6.1.2. Pricing Strategy

Pricing for the concentrate is based on the Off-take Agreement in place with CRONIMET Asia Pte Ltd (CR Asia) over the LGS material and any historical tailings processed on site. The summary of the terms are as follows:

- The Base Price paid by CR Asia to the Seller for the Tungsten Concentrate per one Metric Ton Unit (MTU) of WO_3 contained in a Dry Metric Ton delivered FCA Mount Carbine (INCOTERMS 2010) shall vary with each shipment and shall be based on an index. For clarity, this is an ex-gate purchase with CR Asia responsible for the cost of all logistics from the Mt Carbine site to destination.
- The index is the London Metal Bulletin (LMB) published price for "Low and High European APT" averaged for the calendar month of delivery of the Tungsten Concentrate
- CR Asia will pay the Base Price for each delivery which is based on a negotiated percentage of the index (Payable Factor) and is paid for the WO_3 content.

- CR Asia will pay 95% upon delivery of the product and 5% balance payment upon final settlement based on weighing and assaying results.

6.1.3. Customers

Currently CR Asia is the sole off-taker for the Project from the rights secured through early investment into the Mt Carbine Project. Since the start of the project, concentrate has been sold to customers in Europe, the United States, Vietnam, and China.

CR Asia has the right to market the equivalent concentrate tonnes contained in the LGS and historic tailings, thereafter, EQR will have the right to market the concentrate to any external parties that the Company sees fit. To-date, CR Asia has been fair, reasonable, and flexible regarding the purchase of the concentrates produced in terms of quality and quantity specifications. The relationship has been beneficial to the Project and therefore is expected to continue.

6.2. Health and Safety

6.2.1. Eliminating Hazards & Reducing Risks

Risk planning and management is central to the Company's activities, EQR's operations are only conducted when the risk is within acceptable limits and as low as reasonably practicable (ALARP).

The risk planning and management processes developed and implemented at the Mt Carbine site aim to provide a logical and systematic method of identifying, analysing, evaluating, treating, monitoring, and communicating risks.

The following hierarchy of controls is applied to mitigate risk to a level which is ALARP:

- Elimination/Removal;
- Substitution;
- Engineering/Isolation Control;
- Administration;
- Personal Protective Equipment; and
- Human Behaviour.

The hierarchy of control is to be used to control hazards identified for **all** risk management processes. Less reliable control measure (e.g., administrative, PPE or safe behaviour controls) should only be implemented as part of a holistic control strategy in addition to controls from the other, more effective categories, or on their **own** where the level of current risk is ALARP.

6.2.2. Risk Management – Principles and Guidelines

EQR's risk management is developed to comply with the requirements of *AS/NZ ISO 31000:2009 Risk Management – Principles and Guidelines*. This standard calls for the following elements:

- Establish the context:
    - Establish the strategic, organisational and risk management context in which the rest of the process shall take place. Criteria against which risk shall be evaluated should be established and the structure of the analysis defined.
- Identify risks:
    - Identify what, why and how things can arise as the basis for further analysis.
- Analyse risks:
    - Determine the existing controls and analyse risks in terms of consequence and likelihood in the context of those controls. The analysis should consider the range of potential

consequences and how likely those consequences are to occur. Consequence and likelihood **may** be combined to produce an estimated level of risk.

- Evaluate risks:
  - Compare estimated levels of risk against the pre-established criteria. This enables risks to be ranked to identify management priorities. If the levels of risk established are low, then risks **may** fall into an acceptable category and treatment **may not** be required.
- Treat risks:
  - Accept and monitor low-priority risks. For other risks, develop and implement a specific management plan, which includes consideration of funding.
- Monitor and review:
  - Monitor and review the performance of the risk management system and changes, which might affect it.
- Communicate and consult:
  - With workers and other stakeholders; the system requirements and the effectiveness of the agreed controls.

More detail can be found in *AS/NZS 4360:2004 Risk Management* should the reader of this chapter wish to investigate further.

Safety and health hazards are identified and managed through a combination of the following processes:

- Existing and historical knowledge of workers;
- Internal and external assessments audits;
- Job Safety Observations;
- Workplace Inspections;
- Pre-Start Checks;
- Wait Take Fives (WTFs) ;
- JSEA's;
- Team Based Risk Assessments;
- Management of inspections;
- Analysis of past incident causation;
- Analysis of past emergency situations;
- Employee/contractor complaints;
- Hazard Log detailing corrective measures, timelines, and responsibilities;
- Industry reports, Safety Alerts, and communications; and
- IMS Control of Work Procedures.

EQR's IMS includes policies, procedures, forms, plans, and registers. These procedures and their associated forms, plans and registers are integral to the proper implementation of EQR's IMS.

EQR maintains a controlled document register (EQ RESOURCES-ADM-REG-0001), employees are informed to always refer to the document register to access the current applicable version of control of work procedures.

Access to the Document Register by employees is controlled and available by contacting the IMS Manager.

6.2.3. Management of Change

EQR Change Management (EQ RESOURCES-SAF-PRO-0034) procedure outlines processes for the prevention of non-compliances resulting from changes in the workplace at the Mt Carbine operations. The

scope covers changes initiated by the Company, as well as changes initiated by other parties, planned/unplanned and sudden or gradual changes, with a requirement that high-risk areas be identified.

EQR Supporting Documents:

- EQ RESOURCES-SAF-PRO-0034 Change Management; and
- EQ RESOURCES-SAF-FOR-0060 Change Management Form.

6.2.4. Procurement

All purchasing of materials, equipment and services are undertaken to ensure that any safety and health considerations are considered. Hazards are to be identified and assessed prior to the hire or lease of equipment or the supply of services or goods. Verification must be supplied that the delivery of equipment or supply of services complies with appropriate safety and health specifications, the Procurement Officer on site is responsible for this task.

Procedures/JSEA's shall be developed and implemented for the safe handling and storage of hazardous goods and substances. EQR has a requirement that a Safety Data Sheet must accompany all hazardous materials brought on to site.

EQR Supporting Documents

- EQ RESOURCES-ADM-PRO-0002 Procurement

6.2.5. Contractor Management

Contractors are pre-approved according to Contractor Management Procedure (EQ RESOURCES-SAF-PRO-0017) prior to attending site. Contractors approved by the SSE receive an induction before working on site. The induction covers site procedures necessary for that contractor's role.

If a contractor is required for a short-term emergency task on the mine site (such as repairs to phone lines) then that contractor will receive the visitor's induction and remain under the supervision of a fully inducted person during their time on site.

All contractors are required to provide and maintain a safe and healthy work environment and are responsible, as a minimum, for performing work to EQR safety and health standards.

A Contractor Management Plan must be developed to **ensure** that contractors working at Mt Carbine are properly managed and supervised.

In addition, the procedure lists the requirements for:

- The verification of contractors' competencies;
- Valid insurances;
- Verification that machinery is fit for purpose; and
- Contractors' health assessments.

Contractors are required to supply details of employee's tickets, statements of attainments and relevant work history prior to operating on site. All workplace certifications (tickets) must be current and relevant to the workers planned work on site. Contractors and their workers shall not be trained by EQR personnel unless authorised by the SSE. If the evidence is valid, reliable, authentic, current, sufficient, and endorsed, the contractors' employee may be challenge tested and the authorisation process shall be completed.

The objective of this procedure is to allow contractors to work at the mine in such a way that their workers are not subject to an unacceptable level of risk from a safety and health point of view. This procedure applies to all contractors' personnel working on the Project and includes any subcontractors working for a contractor.

EQR Supporting Documents

- EQ RESOURCES-SAF-PPT-0003 EQ Resources Site Induction;

- EQ RESOURCES-SAF-TAA-0003 Visitors Induction;
- EQ RESOURCES-SAF-TAA-0001 Site Induction Assessment Tool;
- EQ RESOURCES-SAF-PRO-0017 Contractor Management; and
- EQ RESOURCES-SAF-FOR-0023 Mobile Equipment Familiarisation Checklist.

6.2.6. Safety and Health Monitoring

It is essential to assess performance to evaluate progress against the requirements, targets, objectives, and to establish plans for continuous improvement.

To properly assess needs EQR:

- Conducts a systematic review of the corporate guidelines, standards, systems, and processes to verify the current standards and controls in place;
- Conducts audits and assessments at determined frequencies to measure the level of compliance and progress to the standards, and assist in the correction and prevention of any systemic issues;
- Reviews performance and accountability processes to indicate progress or deviations for early corrections; and
- Ensure procedures for Management Review and Health and Safety Objectives detail the processes to be applied.

Inspections and Review Systems

Regular inspections on all areas of the operations are conducted to identify and rectify hazards. Workplace inspections are carried out by all Managers and personnel. This enables the Company to use a cross pollination of personnel and experience to help identify hazards and potential risks.

The workplace inspections are completed regularly as per an Inspection Matrix. The Inspection Matrix includes the area to be inspected, when they need inspecting and who is responsible. The schedule is agreed with the SSE and in consultation with the workers to monitor the effectiveness of controls to mitigate risks.

Actions identified from the workplace inspections are recorded in the Corrective Action Register detailing corrective measures, timelines, and responsibilities.

All workplace inspection reports are maintained by the Safety Department on behalf of the SSE.

The SSE shall keep the workplace inspection reports for a period of not less than seven (7) years.

EQR Supporting Documents

- EQ RESOURCES-SAF-PRO-0042 Workplace Inspections;
- EQ RESOURCES-SAF-PRO-0061 Management Review; and
- EQ RESOURCES-SAF-PRO-0056 Health and Safety Objectives.

6.2.7. Evaluating Compliance Safety & Health

Safety and Health Compliance

Periodic, at least annual, evaluation of compliance with applicable legal and other requirements will be planned to use the EQR internal and external audit schedule, in addition, legal compliance system Safety Law provides regular updates (at least monthly) to legal and other requirements. The internal and external schedule includes, amongst other things, the following:

- Legal Compliance Reviews;
- Management Systems;

- Management Plans; and
- EQR Policies & Procedures.

Records of the findings, actions and changes required are documented and retained, actions managed and recorded in the Corrective Action Register.

6.3. Environment, Community and External Relations

6.3.1. Environment

The Environmental Programs (EPs) (maintained by EQR) are used to establish, implement, control, and maintain processes to meet the requirements of the IMS and implement the environmental objectives identified by the Company. The Environmental Monitoring and Reporting System (EMRS) records information pertinent to the implementation of the IMS governing the operations. The data is used to identify potential environmental risks that require management to assess achievement of the environmental objectives.

Changes to activities on-site, which may affect the EMS, can be planned or unintended changes. The Company controls these changes by reviewing the potential risk and taking action to mitigate any adverse effects, as necessary. Changes to EQR's activities are identified through the managers' weekly planning meeting, managers' pre-shift briefings, departmental pre-start meetings and incident investigation processes. Risks and controls associated with changes are determined through the risk assessment process.

Outsourced processes are controlled through evaluation of contractors, as documented in the *Contractor Management Procedure* (EQ RESOURCES-SAF-PRO-0017).

During planning and design of activities or procurement, the environmental risk associated with the activity or item of procurement is reviewed and the relevant controls are identified. For example, the waste management hierarchy of a product or process is considered, *i.e.* substituting a hazardous chemical for a less hazardous chemical, using a material that can be re-used or recycled at its end of life.

When procuring new infrastructure or equipment for the Mt Carbine operation, a life cycle perspective will be applied. This will include consideration of the expected lifespan and efficiency of the item to be procured, as well as how the item will be managed at end of use. Maintenance requirements of the new infrastructure or equipment will also be considered to ensure that potential waste generation is minimised.

EQR is in the process of implementing FIIX to manage one-off and routine maintenance work requirements, including inspection and maintenance of environmental controls, tools, and processes. Preventative maintenance (PM) work requirements are set up in FIIX, and include assigning responsibility, tasks, and timeframe for completion. PM requisitions are then raised by the FIIX system at the nominated time and provided to relevant personnel for completion by the required date (*e.g.* one-off repair request, routine maintenance checklists). If the PM tasks identify further maintenance work is required, these tasks are added to the FIIX system.

6.3.2. Environmental emergencies

The requirement for Emergency Management and Contingency Preparedness is referenced in EQR's Emergency Management Plan (EQ RESOURCES-SAF-PLN-0003). Accordingly, EQR is required to identify potential emergency situations and document emergency procedures for preventing and mitigating associated illness, injury, or other emergency situations. These procedures will be reviewed, revised, and tested periodically, where practicable, in accordance with the Emergency Management Plan.

6.3.3. Environmental incidents

All environmental incidents identified on site will be documented on the Incident/Injury Report Form (EQ RESOURCES-SAF-FOR-0005). All accidents and incidents will be discussed at the managers' weekly planning meeting and managers' pre-shift briefings and daily departmental pre-start meetings. Corrective actions are maintained on the Corrective Action Register by managers/supervisors.

6.3.4. Environmental Compliance

During the review of the obligations under State and Commonwealth Legislation an assessment of the compliance of EQR processes against current legislative obligations under State and Commonwealth Legislation will be undertaken.

Where the annual review of obligations and site-specific licences and permits, the internal audit or management review identifies processes that are not in compliance with current legislative obligations, the non-compliance will be addressed in accordance with the Incident Notification and Investigation Procedure (EQ RESOURCES-SAF-PRO-0016) and non-compliance/incident process. The non-compliance will be reported to the relevant State or Federal authority where relevant and corrected or initiated where a longer process is required for correction, within one month of identification of the non-compliance. Corrective actions will be included in the Corrective Action Register.

6.4. Human Resources

The majority of employment comes from the local areas of Mt Carbine, Mt Molloy, Julatten, Mossman, Mareeba, Port Douglas and Cairns. These regional townships will continue to be the focus for employment and local skills upliftment going forward as the operation continues to grow. Most HR matters are handled by the Administration Manager and Corporate Services team on site with any complex cases or specialty jobs having specialist consultants brought in for their relevant expertise. One such group EQR often works with is HR Dynamics, it is intended to continue this relationship as the Company goes forward due to the positive relationship developed thus far.

6.4.1. Leadership and Commitment

EQR management demonstrate leadership and commitment by:

- The development and implementation of this IMS;
- Being accountable for the effectiveness, use and maintenance of the IMS;
- Ensuring that the quality, environment, safety and health policies and objectives are compatible with the strategic direction of the Company;
- Ensuring the implementation of the IMS requirements into the business processes;
- Promoting the use of the process approach and risk-based thinking;
- Ensuring that resources needed for the IMS are available;
- Communicating the importance of effective quality, environment, safety, and health management and of conforming to the IMS requirements;
- Ensuring that the IMS achieves the intended results;
- Engaging, directing, and supporting workers to contribute to the effectiveness of the IMS;
- Ensuring and promoting continual improvement;
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility;
- Encourage workers to report incidents, hazards, risks, and opportunities;
- Consult and encourage participation from the Company's employees; and
- Support if requested functioning safety and health committees.

EQR monitors and reviews leadership and commitment requirements annually at the Management Review Meeting. Outstanding actions are transferred to the site Corrective Action Register.

6.4.2. Integrated Management Policies

The Company's management has established, implemented, and maintains quality, environmental, safety and health policies that describes the purpose, context and supports EQR's strategic direction. The quality, environmental, safety and health policies include objectives, legal and other requirements, reduce worker risk and consult with workers and a commitment to continually improve the quality, environmental, safety and health management systems.

Other policies that support EQR's IMS include:

- Communications Use Policy;
- Environmental Policy;
- Equal Employment and Harassment Policy;
- First Aid Policy;
- Fitness for Work Policy;
- Mission and Vision Statement;
- Quality Policy;
- Safety and Health Policy;
- Security and Access Policy;
- Smoke-free Workplace Policy; and
- Workplace Rehabilitation Policy.

6.4.3. Communicating the Policies

The quality, environmental, safety and health policies are available and maintained on the Company's Intranet, Sharepoint. The quality, environmental, safety and health policies are communicated via site notice boards, are understood by the workforce and applied as required. The quality, environmental, safety and health policies are available on the internet for access by interested parties as required or requested.

6.4.4. Roles, Responsibilities and Authorities

EQR's SSE has responsibility to ensure that the IMS is implemented. Tasks have been assigned by the SSE to Department Managers. The Department Managers may delegate the task to other personnel; however, the responsibility remains with the Department Manager. Safety, Health, Environmental & Training Manager supports the SSE and other managers in meeting the quality, environment, safety, and health objectives, and have responsibility for monitoring the implementation of the quality, environment, safety and health procedures.

Table 2: Roles and Responsibilities

Roles	IMS Responsibilities
Site Senior Executive	• Establish and communicate overall direction. • Develop quality, environment, safety and health policies. • Consider quality, environment, safety, and health requirements. • Develop quality, environment, safety, and health objectives. • Appropriately resource quality, environment, safety, and health management. • Ensure quality, environment, safety, and health compliance.

Roles	IMS Responsibilities
	• Promote continual improvement. • Identify interested party needs and expectations. • Review the operation of the IMS. • Conform to IMS requirements. • Promote customer focus throughout the Company.
Operations Manager	• Consider quality, environment, safety, and health requirements. • Develop quality, environment, safety, and health objectives. • Appropriately resource quality, environment, safety, and health management. • Ensure quality, environment, safety, and health compliance. • Promote continual improvement. • Identify interested party needs and expectations. • Review the operation of the IMS. • Conform to IMS requirements. • Promote customer focus throughout the Company.
Department Foreman	• Implement quality, environment, safety, and health procedures. • Review the operation of the IMS. • Conform to IMS requirements. • Participate in Management reviews. • Ensure loaded product meets physical and chemical specifications.
Safety, Health, Environment & Training Manager	• Monitor and report on overall IMS performance . • Review the operation of the IMS. • Identify and deliver training requirements. • Communicate and correspond with relevant regulators/local government regarding quality and environmental management. • Conform to IMS requirements. • Develop quality and environmental policy. • Ensure the IMS conforms to the relevant ISO Standards. • Maintain quality and environmental management system changes. • Ensure loaded product meets physical and chemical specification. • Develop safety and health policy. • Maintain safety and health management system changes.

Roles	IMS Responsibilities
	• Report on the performance of the safety and health management system to management.
All Personnel	• Conform to IMS requirements. • Discuss quality, environment, safety, and health improvement ideas with management. • Stop the process when the quality of the product is compromised, the environment has or can be affected, or the safety and health of workers is at risk. • Participate in quality, environment, safety, and health improvement programs.

6.4.5. Consultation and Participation of Workers

Workers are given the opportunity to consult and participate in quality, environment, safety and health issues and in the development of site-specific quality, environment, safety and health policies and procedures.

Consultation and participation are essential in the development of EQR's IMS.

EQR's management are committed to employee engagement for the enhancement of the Quality, Environment, Safety and Health management system.

Workers can request that a person be appointed or elected to the position of Safety and Health Representative, if so requested, EQR will comply as required by the Mining and Quarrying Safety and Health Act 1999.

The main consultative methods for EQR include the department and manager's daily pre-start meetings/pre-shift briefings and the quality, environment, safety and health managers weekly planning meeting. Other consultative methods include:

- Quality, environment, safety and health investigations;
- Workplace inspections;
- Hazard identifications;
- Formulating written procedures;
- Planning of quality, environment, safety and health training;
- The operations of the Risk Assessment Teams; and
- The Site Safety Representatives.

All these methods allow for the cross-pollination of ideas and opinions and push personnel to think and consider their own views and opinions on quality, environment, safety, and health issues.

6.5. Accommodation

Employment will continue from the local region, so that the employees can work on a drive in, drive out (DIDO) basis. Employees are currently doing this, and it has worked fine for all parties involved. Certain personnel that live in more distant locations, for example Cairns, rent a space at the Mt Carbine Caravan Park, next to the mine site, for the duration of their shift and commute to their place of residence at the conclusion of their swing. The Mt Carbine Motel also offers operators and contractors nightly rates with meals included for those working on shift or performing contracts in the area.

EQR has secured three houses/units to be used as and when required by contractors and consultants at the Mt Carbine Caravan park so as to minimise travel distance for those performing work on site.

6.6. Information Management.

6.6.1. General

Documented information in the form of processes, plans, forms, and procedures are developed and maintained to aid the effective operation of the IMS. All quality, environmental, safety and health documented information will be stored on the Company's intranet and/or in hard copy at the Mt Carbine site. Quality, environmental, safety and health documented information will be retained for a period of not less than five years or in accordance with other laws, regulations and requirements.

6.6.2. Creating and Updating

Document Control Procedure (EQ RESOURCES-ADM-PRO-0001) describes the required practices for the creating and updating of documents. The procedure includes the creation, naming, updating, review, and approval requirements.

6.6.3. Document Control

Responsibilities and processes for control of EQR's documented information are outlined in EQR's Document Control Procedure.

The IMS Manual that governs the operations is a controlled document. The controlled copy is the digital version available on the EQR Document Register (EQ RESOURCES-ADM-REG-001). All printed copies of this document are uncontrolled and are marked "UNCONTROLLED WHEN PRINTED" in the footer.

Documents maintained for the IMS include, but are not limited to, the following:

- Communications with interested parties;
- Managers' weekly planning meeting;
- Managers' pre-shift briefings;
- Departmental pre-start meetings;
- Community complaints;
- Incident reports;
- Non-conformance reports;
- Monitoring results;
- Sampling results;
- Calibration records; and
- Training records.

6.6.4. Control of Records

Records shall be kept of all tasks and activities which relate to the IMS and to operational aspects which have the potential to affect the quality of the product, safety and health of people or the environment.

The records to be kept, shall include records required by acts, regulations, statutory codes of practice, and required by Australian Standards referenced in acts, regulations, and statutory codes of practice.

The SSE must ensure the following records are kept as defined in Table 3.

Table 3: Records Requirements

Document	Records Required	Location	Responsibility	Privacy Requirement	Retainment Period	Disposal Method
Monitoring Air-Borne Contaminate Levels	Results	Electronic Network	HSET Manager	No	30 Years	Non-Secure
RII Certificates	Training	Electronic Network	HSET Manager	No	While in Control	Non-Secure
Confined Spaces	Risk Assessment	Electronic Network	HSET Manager	No	28 Days	Non-Secure
Confined Spaces	Entry permit	Electronic Network	HSET Manager	No	2 Years	Non-Secure
High Risk Work	Licences	Electronic Network	HSET Manager	Yes	While in Control	Secure
Electrical Work on Energised Equipment	Permit	Electronic Network	Electrical Supervisor	No	2 Years	Non-Secure
Records of Plant required to be Registered	Tests Inspections Maintenance Commissioning De-commission Alterations	Electronic Network	Maintenance Manager	No	While in Control	Non-Secure
Manifest of Hazardous Chemicals	Manifest	Electronic Network	Stores Manager	No	While in Control	Non-Secure
Firefighting Equipment	Test	Electronic Network	HSET Manager	No	While in Control	Non-Secure
Health Monitoring	Records	Electronic Network	HSET Manager	Yes	30 Years	Secure
Hazardous Chemical Exposure	Record	Electronic Network	HSET Manager	No	30 Years	Secure
Asbestos	Register	Electronic Network	HSET Manager	No	While in Control	Non-Secure
Asbestos Health Monitoring	Records	Electronic Network	HSET Manager	Yes	40 Years	Secure
Asbestos	Training Records	Electronic Network	HSET Manager	No	5 Years	Non-Secure
Workplace Medicals	Records	Electronic Network	HSET Manager	Yes	70 Years	Secure
Health and Fitness Assessments	Records	Electronic Network	HSET Manager	Yes	70 Years	Secure
Mines Inspector Reports	Records	Mines Register and Electronic	SSE and HSET Manager	No	While in Control	Handover to Operator (Owner)
Electrical Systems	Records	Electronic	Electrical Manager	No	While in Control	Non-secure

Document	Records Required	Location	Responsibility	Privacy Requirement	Retainment Period	Disposal Method
Environmental Monitoring	Records	Electronic Network and Hard Copy	HSET Manager	No	5 Years	Non-Secure

Records shall be traceable to tasks and activities, products or services, and the procedure or work instruction to which the record relates. EQR's preference is for records to be kept in electronic format. Physical records shall be stored in such a location to prevent damage or deterioration. Records shall be stored in a manner to ensure that all records are easily retrievable and accessible to the personnel who may need them.

Destruction of records shall only be carried out if appropriately authorised and if the record is no longer needed (e.g., the prescribed retention period has been reached). Destruction shall be carried out so that it is complete, and the confidentiality of the information is preserved. Evidence of the destruction shall be recorded.

Medical records shall be treated as strictly confidential. Medical records shall be kept secured (locked) and be kept indefinitely. The SSE may only obtain a worker's medical record with the worker's written consent. If required, medical recommendations, based on the medical records but excluding medical details, may be given by the SSE to the person's Line Manager. The SSE must not disclose to anyone, other than the worker or someone with the worker's written consent, the contents of the worker's medical record.

6.7. Emergency Response Plans

EQR's Emergency Response Management Plan (EQ RESOURCES-SAF-PLN-0003) minimises the level of risk to life, property, and the environment due to an emergency situation.

The EQR Emergency Response Management Plan describes the immediate actions required by designated site personnel.

All personnel are required to undergo site and specific area inductions to familiarise themselves with locations of emergency equipment and evacuation points. Emergency contact details and procedures are provided during their induction.

An Emergency Management Plan has been developed and implemented to manage emergencies and outlines:

- Identification of potential emergency situations;
- Warning and alarm systems which are tested at regular intervals;
- Emergency organisations, responsibilities, skill, and competency required to fulfil roles;
- Co-ordination and reporting to management;
- List of key personnel, contacts, back up and support services;
- An internal and external communication plan;
- Training plans and testing for effectiveness;
- Emergency rescue equipment available;
- Business continuity; and
- Evacuation plans.

EQR has an emergency response team (ERT) who have been trained in emergency response and are on call during rostered shifts to deal with all emergency situations.

EQR Supporting Documents

- EQ RESOURCES-ADM-FOR-0001 EQ RESOURCES Emergency Contacts List; and

- EQ RESOURCES-SAF-PLN-0003 Emergency Management Plan.

7. References

- Change Management (EQ RESOURCES-SAF-PRO-0034)
- Change Management Form (EQ RESOURCES-SAF-FOR-0060)
- Contractor Management (EQ RESOURCES-SAF-PRO-0017)
- Contractor Management Procedure (EQ RESOURCES-SAF-PRO-0017)
- Document Control Procedure (EQ RESOURCES-ADM-PRO-0001)
- Document Register (EQ RESOURCES-ADM-REG-0001)
- Document Register (EQ RESOURCES-ADM-REG-001).
- Emergency Contacts List (EQ RESOURCES-ADM-FOR-0001)
- Emergency Management Plan (EQ RESOURCES-SAF-PLN-0003)
- Emergency Management Plan (EQ RESOURCES-SAF-PLN-0003)
- Emergency Response Management Plan (EQ RESOURCES-SAF-PLN-0003)
- Health and Safety Objectives (EQ RESOURCES-SAF-PRO-0056)
- Incident Notification and Investigation Procedure (EQ RESOURCES-SAF-PRO-0016)
- Incident/Injury Report Form (EQ RESOURCES-SAF-FOR-0005).
- Management Review (EQ RESOURCES-SAF-PRO-0061
- Mobile Equipment Familiarisation Checklist (EQ RESOURCES-SAF-FOR-0023)
- Procurement Procedure (EQ RESOURCES-ADM-PRO-0002)
- Site Induction (EQ RESOURCES-SAF-PPT-0003)
- Site Induction Assessment Tool (EQ RESOURCES-SAF-TAA-0001)
- Visitors Induction (EQ RESOURCES-SAF-TAA-0003)
- Workplace Inspections (EQ RESOURCES-SAF-PRO-0042)

8. List of Abbreviations

Abbreviation	Description
ALARP	As Low as Reasonably Practicable
CEO	Chief Executive Officer
EQR	EQ Resources Limited
ERT	Emergency Response Team
FIIX	FIIX Maintenance Management program
IMS	Integrated Management System
IMSM	Integrated Management System Manual
LGS	Low Grade Ore Stockpile
PM	Preventative Maintenance
ROM	Run of Mine
SSE	Site Senior Executive
WTF	Wait Take Five

Appendix A Integrated Management System Manual

Integrated Management System Manual

EQR-IMS-PLN-0001

Version: 1

1 Document Control History and Status

Version	Date issued	Developed by	Signature	Date Approved	Revision type
Rev 1	02/12/2021	Gary Battensby			Initial Document
		Barry Strik			
Authorised By	Gary Battensby – Senior Site Executive (SSE)				
Signature:		Date:			

File Name:	EQR-IMS-PLN-0001_v1.0
Authors:	Barry Strik / Gary Battensby
SSE:	Gary Battensby
Name of Project:	EQ Resources
Name of Document:	Integrated Management System Manual
Document Version:	Version 1.0

Table of Contents

2 Introduction

An Integrated Management System (IMS) has been developed for use by EQ Resources (EQ RESOURCES). The IMS has been designed to help EQ RESOURCES meet its quality, environmental, safety and health management objectives and activities undertaken at the EQ Resources site in north Queensland. It is a non-regulatory document. In implementing the IMS, staff at the site will assist EQ RESOURCES to meet its compliance obligations and manage quality of its product, environmental impacts and workplace safety and health to levels acceptable to the company and interested parties.

The IMS outlines:

- what has to be done;
- how it is to be done;
- who does it;
- when it is to be done; and,
- how you will know it is done.

Responsibility for the integrated management system has been allocated to personnel whose decisions and activities influence performance. If your workplace decisions lead to impacts on the integrated management system, then you will be given the appropriate management responsibility. It is essential that you clearly understand the reasoning behind the integrated management system tasks allocated to you. EQ RESOURCES accepts that it is the Company's duty and responsibility to ensure that those given the responsibility for integrated management system tasks are empowered to perform their role. If you feel you do not have the authority to take responsibility for the tasks assigned to you, you must discuss these issues with your supervisor.

EQ RESOURCES Management understands their obligations for quality product, protecting the environment and workplace safety and health.

In line with this obligation management **shall ensure** compliance with proper work practices as determined by our Integrated Management Systems, which are integral to the company operational procedures.

This EQ RESOURCES Integrated Management System Manual (IMSM) is a structured process for the implementation and setting of objectives and targets in the management of quality, environment, safety and health in the working environment. EQ RESOURCES Management understands their obligations to provide quality product, for the protection of the environment and the prevention of workplace incidents, injuries and illnesses and is committed to the wellbeing and safety of workers, clients, contractors, authorised visitors and anyone else who may be affected by our operations.

This plan meets the requirements of:

- ISO 9001:2015 Quality Management Systems – Requirements.
- ISO 14001:2015 Environmental Management Systems – Requirements.
- IOS 45001:2018 Occupational Health and Safety Management Systems - Requirements.
- Queensland Department of Natural Resources, Mine and Energy (DNRME) *"SafeGuard"* Elements

Section 11 includes a document map that references the sections of this IMSM with the above.

EQ RESOURCES Management understands that an effective IMS demands strong management and leadership, including commitment and involvement of **all** workers and other stakeholders in the workforce with the embracement of a workplace culture which **ensures** that:

"Quality product, environmental protection and safe behaviour becomes the way things are done."

Other contributory factors to the effectiveness of the IMSM are:

- The implementation of goal setting and feedback programs in cooperation with the workforce which proactively measure for the achievement of culture change
- The training of people at **all** levels in the organisational structure so they are equipped with sufficient and appropriate competency, skills and knowledge

Providing quality product, protecting the environment and workplace safety and health is applied to **all** our work processes including mining and processing operations, changes to work procedures, design and development of existing/new plant and equipment.

This manual describes EQ RESOURCES's Integrated Management System and forms the basis for standards within the company.

The EQ RESOURCES IMS has the full endorsement of the EQ RESOURCES Management Team.

3 Overview of the Facility

EQ Resourcess (Mt Carbine Operations) is situated approximately 70km North of Mareeba & 140km North West of Cairns, It is situated 1383 meters above sea level, on the eastern coast of the Cape York Peninsula in Far North Queensland.

The Quarrying and Mining operations currently extracts Tungsten using old quarry stockpiles and tailings stockpiles, load and haul Materials with Earth moving machinery and Haul trucks using a Crushing, and screening then processing separation techniques to achieve a final concentrate.

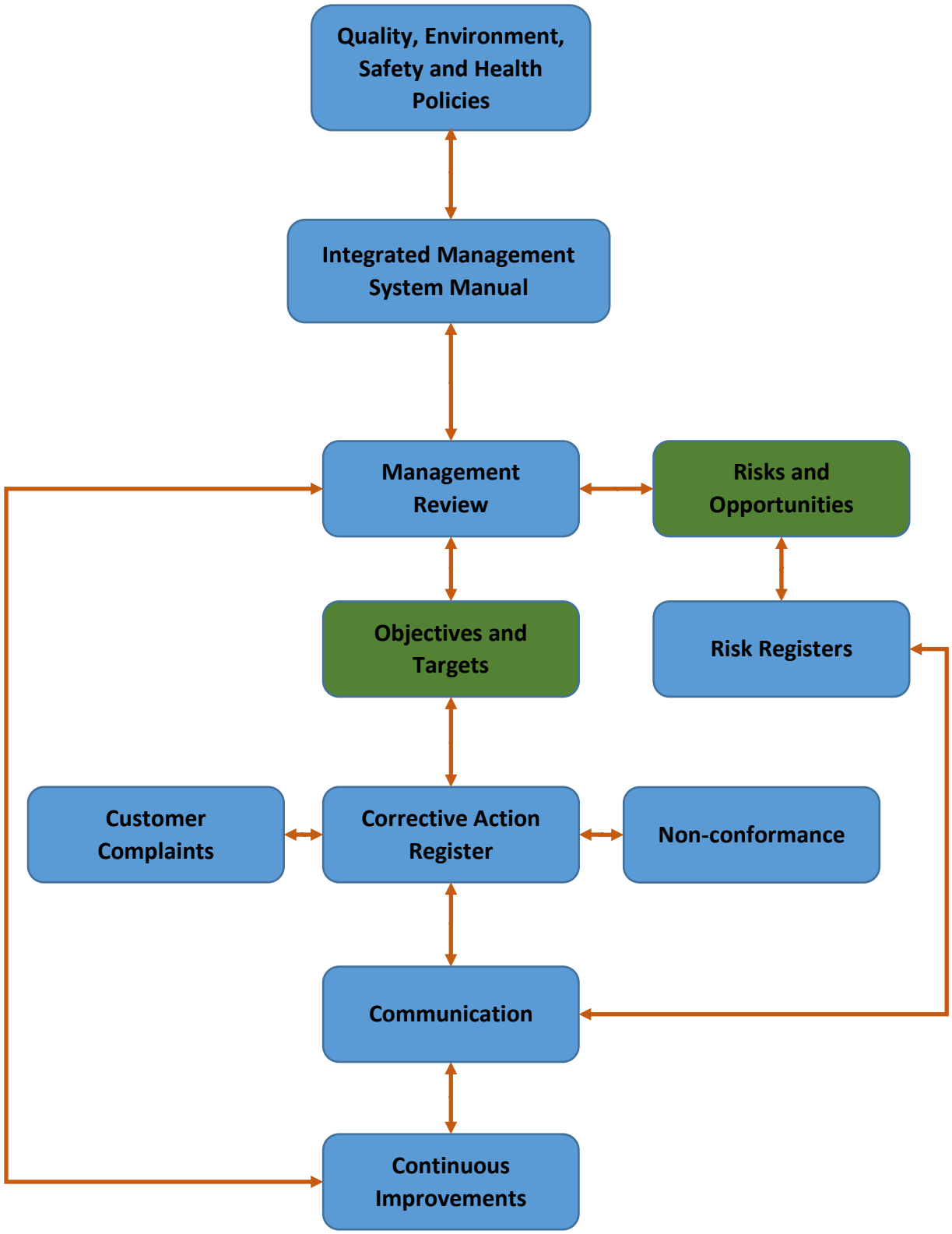
Mt Carbine Quarrying Operations is wholly owned by EQ Resources & Mt Carbine Retreatment Management is in a joint venture agreement with EQ Resources & Cronimet being equal partners.

The EQ RESOURCES site covers a lease area of approximately 358ha.

Land tenure relevant to EQ RESOURCES.

Mining Lease #	Lease Area (ha)	Minerals/Purpose	Expiry Date	Land (tenure type)
ML 4867	358	Wolfram, Ion Tungstate, Scheelite Calcium Calcite 4 wolfram to 1 scheelite IFEMN0[3]	31/07/2022	SP127335 (Mining)
ML 4919	7.891	Wolfram, Ion Tungstate, Scheelite Calcium Calcite 4 wolfram to 1 scheelite IFEMN0[3]	31/08/2023	
EPM 14871	10 - Sub blocks	Exploration	12/12/2025	
EPM 14872	21 – Sub blocks	Exploration	11/12/2025	
EPM 27394	4 – Sub blocks	Exploration	01/06/2025	

4 Integrated Management System Model



5 Terms and Definitions

The terms and definitions provided in the following Standards apply to this document:

- ISO 9001:2015 – Quality Management System
- ISO 14001:2015 – Environmental Management System
- ISO 45001:2018 – Occupational Health and Safety Management System

6 EQ RESOURCES Context

EQ RESOURCES has identified external and internal issues that are relevant to its purpose and its strategic direction that affect EQ RESOURCES's ability to achieve the intended outcomes of this IMS. The issues are outlined below:

External Context

- Relationships with Traditional Owners (EQ Resources has **no** requirements under any Aboriginal Corporation RNTBC Compensation Agreement, native title, employees, pre-clearing surveys for identification of significant cultural sites, retention of infrastructure at end of mine life).
- Maintenance of legislative requirements to ensure operations can continue (eg Environmental Authority (EA) permitting operations, current Plan of Operations (PoO) and Financial Assurance (FA) required for operations to continue uninterrupted, Water Licence for access to water).
- Market factors such as competition, including market share, customer growth trends, market stability, supply chain relationships
- Mining lease for the ongoing supply of Tungsten & Quarry products.
- External laboratory services
- Suppliers not able to source required equipment for maintenance/breakdowns
- Inclement weather (far North Queensland tropical conditions).

Internal Context

- Management commitment to meeting IMS requirements.
- Availability of appropriately qualified and trained personnel.
- Functional laboratory.
- Functional Tungsten Concentre & Quarry product delivery and export system.
- Dependence on mains power
- Internal supply/stock limits for maintenance/breakdowns
- Plant availability
- Mine planning short and long-term needs.
- Maintaining currency of emergency preparedness and response systems and training.
- Meeting monitoring and reporting requirements to achieve legal compliance (*eg* Environmental Authority EPPR00438313).
- Continued ability to receive fuel and goods and remove waste from site.
- Uninterrupted access by road for transport of staff and small goods to and from site.
- Communication of environmental roles, expectations and responsibilities.

Environmental

- Continued availability of Tungsten & Quarry aggregates resource until end of mine life.
- Water availability for production.
- Flooding of infrastructure.
- Cyclonic conditions interrupting site activities and cyclone damage to infrastructure.
- Fauna breeding places impacting mine path or interrupting production.

- Impacts to environmental values from the operations

EQ RESOURCES will monitor and review information about these external and internal issues annually at the Management Review meeting.

7 Interested Parties

Due to their effect or potential effect on EQ RESOURCES's ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, EQ RESOURCES has identified interested parties and the needs and expectations of these interested parties relevant to EQ RESOURCES IMS.

The interested parties were identified by EQ RESOURCES management. The interested parties and their needs and expectations will be reviewed during the annual Management Review meeting of the IMS

Internal Interested Parties	Needs, Expectations, and Issues
EQ Resources management	Manage risks and opportunities to ensure continuous improvement and operation
EQ Resources Workers	Need clear communication of obligations and expectations. Expect to work in a safe and healthy environment
Mt Carbine Operations	Manage risks and opportunities to ensure continuous improvement and operation
EQ RESOURCES	Need and expect Mt Carbine Operations to manage risks and opportunities that can affect reputation, product quality, worker safety and health and financial return

External Interested Parties	Needs, Expectations, and Issues
Suppliers / Contractors	Expect EQ Resources to manage risks and opportunities to ensure continuous operation and payment
Department of Environment and Science (DES)	Expect compliance obligations to be met
Commonwealth Department of the Environment and Energy (DoEE)	Expect compliance obligations to be met
Department of Natural Resources, Mines and Energy	Expect compliance obligations to be met
Department of National Parks, Sport and Racing	Need EQ Resources cooperation to achieve environmental goals for protection of the Great Barrier Reef Marine Park
Telstra	Expect EQ Resources to manage risks and opportunities that can affect uninterrupted payment
QLD Resources Council	Need collaboration on environmental issues
Minerals Council of Australia	Expect EQ Resources to operate in accordance with advocated best practice approaches.
Industry Media	Expect clear and honest communication
Conservation and other NGOs.	Need EQ Resources cooperation to achieve NGOs' environmental goals
Customers	Quality Product. Information as requested from Mt Carbine Office

NOTE: Customer requirements are specified to EQ Resources Mt Carbine Office for Quarry products. The required specifications for Mt Carbine Quarry product are provided by the department of main roads.

Tungsten specifications are set by Cronimet Australia pty ltd & EQ Resources.

These specifications are defined in a documented Specification Sheet. Customers communicate to EQ Resources Mt Carbine office for their required product and specifications. EQ Resources maintain specific Product Quality Specification sheets, inclusive of laboratory analysis reports defining the physical and chemical specifications of each product.

8 Scope of the EQ RESOURCES IMS

The included and excluded scope of this IMS are described in sections 4.3.1 and 4.3.2 below.

8.1.1 Included Activities

The Quality, Environment, Safety and Health issues identified during the mining and processing of Tungsten & Quarry products which may contain silica as listed below.

8.1.2 Mining

Mining is currently by an extraction technique utilising Mt Carbine Operations personnel, including:

- Identification of areas to be mined and cleared
- Extraction of Ore from low grade stockpiles by loaders, excavators & dump trucks
- Transportation of raw product via dump trucks to crushing/screening circuits.
- Drilling & Blasting by suitably qualified contractors (in the near future)

8.1.3 Processing

Includes:

- Transportation of raw product via dump trucks and (planned/future) slurry system
- Treatment of raw product via the treatment plant
- Bagging of final cons in 1 Tonne bulk bags
- Transport of bulk bags to trucks for shipping
- Bulk bags loaded into sea containers for shipping
- Fuel storage (Bulk Fuel)
- Rehabilitation of mined areas

8.1.4 Site Services

The IMS scope includes the following site services:

- Product analysis
- Laboratory Processes
- Administration activities
- Contractor management
- Tender/contract review and administration processes;
- Asset management;
- Processes associated with customer feedback as received from EQ Resources Mt Carbine Operations Office.
- Waste transfer
- Fixed & mobile plant maintenance
- Sewage and water management
- Community and stakeholder relations

The scope also includes the needs and expectations of interested parties, internal and external issues and the quality of EQ RESOURCES's Products.

8.1.5 Excluded Activities

- Shipping scheduling, quantities and operations
- Customer communication (Managed by EQ Resources)
- Required quantities to be shipped

9 Integrated Management System

This IMS Manual addresses the intended outcomes of ISO 9001:2015 Quality Management Systems, ISO 14001:2015 Environmental Management Systems and IOS 45001:2018 Occupational Health and Safety Management Systems system. Through the application of this Integrated Management System Manual (IMSM) EQ RESOURCES will:

- demonstrate EQ Resources ability to consistently provide quality Quarry products that meets customer requirements & Tungsten concentrate to meet the requirements of Cronimet Australia & EQ Resources;
- enhance customer satisfaction;
- enhance environmental performance;
- continually improving occupational safety and health;
- achieve legal and other requirements; and,
- deliver on quality, environment, safety and health objectives.

10 Leadership and Commitment

EQ Resources management demonstrate leadership and commitment by:

- the development and implementation of this IMSM
- being accountable for the effectiveness, use and maintenance of the integrated management system;
- ensuring that the quality, environment, safety and health policies and objectives are compatible with the strategic direction of EQ RESOURCES;
- ensuring the integration of the integrated management system requirements into the EQ RESOURCES's business processes;
- promoting the use of the process approach and risk-based thinking;
- ensuring that resources needed for the IMS are available;
- communicating the importance of effective quality, environment, safety and health management and of conforming to the integrated management system requirements;
- ensuring that the integrated management system achieves its intended results;
- engaging, directing and supporting workers to contribute to the effectiveness of the integrated management system;
- ensuring and promoting continual improvement;
- supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility;
- encourage workers to report incidents, hazards, risks and opportunities;
- consult and encourage participation from EQ RESOURCES workers; and,
- support if requested functioning safety and health committees.

EQ Resources monitors and reviews leadership and commitment requirements annually at the Management Review meeting. Outstanding actions are transferred to the site corrective action register.

10.1.1 Customers

EQ Resources management demonstrate leadership and commitment to our customers by ensuring that:

- customer requirements are determined, understood and consistently met;
- the risks and opportunities that can affect conformity of products and services and the ability to enhance customer satisfaction are determined and addressed; and,
- maintain the focus on enhancing customer satisfaction.

EQ Resources monitors and reviews customer requirements, including risks and opportunities, annually at the Management Review meeting. Outcomes and actions will be included in the site Business Plans.

11 Integrated Management Policies

EQ Resources management has established, implemented and maintains Quality, Environmental, Safety and Health Policies that describes the purpose, context and supports EQ Resources strategic direction. The Quality, Environmental, Safety and Health Policies include objectives, legal and other requirements, reduce worker risk and consult with workers and a commitment to continually improve the quality, environmental, safety and health management systems.

Other policies that support the EQ Resources IMS include:

- Communications Use Policy
- Environmental Policy
- Equal Employment and Harassment Policy
- First Aid Policy
- Fitness for Work Policy
- Mission and Vision Statement
- Quality Policy
- Safety and Health Policy
- Security and Access Policy
- Smoke-free Workplace Policy
- Workplace Rehabilitation Policy

11.1.1 Communicating the Policies

The Quality, Environmental, Safety and Health Policies are available and maintained on the company network drive. The Quality, Environmental, Safety and Health Policies are communicated via site notice boards are understood by the workforce and applied as required. The Quality, Environmental, Safety and Health Policies are available on the internet for access by interested parties as required or requested.

12 Roles, Responsibilities and Authorities

EQ RESOURCES's Site Senior Executive has responsibility to ensure that the IMS is implemented. Tasks have been assigned by the Site Senior Executive to Department Managers. The Department Managers may delegate the task to other personnel; however the responsibility remains with the Department Manager. Safety, Health, Environmental & Training Dept support the Site Senior Executive and other managers in meeting the quality, environment, safety and health objectives, and have responsibility for monitoring implementation of the Quality, Environment, Safety and Health Procedures.

EQ RESOURCES Roles	IMS Responsibilities
Site Senior Executive	• Establish and communicate overall direction. • Develop Quality, Environment, Safety and Health Policies • Consider quality, environment, safety and health requirements

EQ RESOURCES Roles	IMS Responsibilities
	• Develop quality, environment, safety and health objectives • Appropriately resource quality, environment, safety and health management • Ensure quality, environment, safety and health compliance • Promote continual improvement • Identify interested party needs and expectations • Review the operation of the IMS • Conform to IMS requirements • Promote customer focus throughout EQ RESOURCES
Operations Manager	• Consider quality, environment, safety and health requirements • Develop quality, environment, safety and health objectives • Appropriately resource quality, environment, safety and health management • Ensure quality, environment, safety and health compliance • Promote continual improvement • Identify interested party needs and expectations • Review the operation of the IMS • Conform to IMS requirements • Promote customer focus throughout EQ RESOURCES
Department Foreman	• Implement quality, environment, safety and health procedures • Review the operation of the IMS • Conform to IMS requirements • Participate in Management reviews • Ensure loaded product meets physical and chemical specifications
Safety, Health, Environment & Training Dept	• Monitor and report on overall IMS performance • Review the operation of the IMS • Identify and deliver training requirements • Communicate and correspond with relevant regulators/local government regarding quality and environmental management. • Conform to IMS requirements • Develop Quality and Environmental Policy • Ensure the IMS conforms to the relevant ISO Standards • Maintain quality and environmental management system changes • Ensure loaded product meets physical and chemical specification • Develop Safety and Health Policy • Maintain safety and health management system changes • Report on the performance of the safety and health management system to management
All Personnel	• Conform to IMS requirements • Discuss quality, environment, safety and health improvement ideas with management

EQ RESOURCES Roles	IMS Responsibilities
	• Stop the process when the quality of the product is compromised, the environment has or can be effected or the safety and health of workers is at risk • Participate in quality, environment, safety and health improvement programs.

13 Consultation and Participation of Workers

Workers are given the opportunity to consult and participate in quality, environment, safety & health issues and in the development of site specific Quality, Environment, Safety and Health Policies and Procedures.

Consultation and participation is essential in the development of EQ RESOURCES's Integrate Management System.

EQ RESOURCES management are committed to employee engagement for the enhancement of the Quality, Environment, Safety and Health management system.

Workers can request that a person be appointed or elected to the position of Safety & health Representative, if so requested, EQ RESOURCES will comply as required by the *Mining and Quarrying Safety and Health Act 1999*.

The main consultative methods for the company include the department and manager's daily pre-start meetings/pre-shift briefings and the Quality, Environment, Safety and Health managers weekly planning meeting. Other consultative methods include:

- Quality, Environment, Safety and Health investigations
- Workplace inspections
- Hazard Identifications
- Formulating written Procedures
- Planning of Quality, Environment, Safety and Health Training
- The operations of the Risk Assessment Teams
- The Site Safety Representatives

All these are methods allow for the cross-pollination of ideas and opinions and push personnel to think and consider their own views and opinions on quality, environment, safety and health issues.

14 Risks and Opportunities

14.1.1 General

The need for risk identification is determined on the basis of information and trends regarding the performance and effectiveness of the Integrated Management System.

Risks are identified and evaluated when performance data indicates that there are trends of decreasing capability and/or effectiveness of the integrated management system. For example:

- Increasing incidence of product nonconformity, environmental impacts and/or safety and health events;
- Excessive equipment problems; or,
- Increasing number of audit findings against the same system process or department.

An opportunity is a set of circumstances which makes it possible to do positive things, for example:

- Develop new products and services;
- Develop new markets and/or increase market share;
- Improve work environment;
- Improve productivity; or,

- Improve operational efficiency (reduction of resource use, reduction of waste, etc.)

Opportunities may be identified as positive effects of risks, as in a risk forcing implementation of a risk reduction measure that is beneficial in a broader context than just reducing this particular risk. Risk and opportunities are evaluated at the annual management review meeting.

14.1.2 Environment, Safety and Health - Aspects & Hazard Identification

The EQ RESOURCES Hazard and Risk Management Procedure (EQ RESOURCES-SAF-PRO-0013) defines the methods to identify, assess and control hazards and risks.

There are many opportunities for aspects & hazards to be identified, these include:

- Risk workshops;
- Hazard and risk assessment process;
- Procedure development;
- Job Safety and Environment Analysis (JSEA);
- The Wait Take Five (WTF) process;
- Hazard Observation Reports;
- The Contractor Risk Assessment Workshop (CRAW);
- Incident reports;
- Workplace inspections;
- Experience;
- Legal and other changes; and/or,
- Management review meetings.

14.1.3 Environment, Safety and Health - Assessment of Risk and Opportunities

Risk assessment is carried out on all identified opportunities, environmental aspects and workplace hazards. Risk are assessed based on the probable frequency and severity, and taking both into account to generate the risk rating. The risk rating determines whether the risk is acceptable (i.e. As Low As Reasonably Practicable ALARP). The EQ RESOURCES Risk Assessment Matrix is used to determine all risk ratings (ref: EQR-SAF-MAT-0002 *Risk Assessment Matrix*).

In addition, risk assessment are carried out prior to any changes and modifications. Including:

- Changes or modifications to the organisation management systems or work practices, including;
    - Routine and non-routine activities
    - Human behaviour, capabilities and other human factors; or,
- introduction of new plant and equipment, materials or new processes;

EQ RESOURCES uses a site risk register known as the *Broad Brush (site) and other Department Risk Registers*, all risk are maintained in an excel workbook named *EQ RESOURCES-SAF-REG-0012 Broad Brush (site) and other Department Risk Registers*, each department risk register, including the Broad-Brush (site) Risk Register, have their individual tab within the workbook. The *"Broad Brush Risk Register"* generally includes site-wide and specific elements of the integrated management system risk assessments.

The *"Broad-Brush Risk Register"* will be reviewed at least:

- annually; or where,
    - there is evidence that the risk assessment is no longer valid, or
    - injury or illness results from exposure to a hazard to which the risk assessment changes, or
    - there is a significant change in the premises or place of work to which the risk assessment relates

The review will be conducted by the Site Senior Executive, Safety Manager and the Departmental Managers.

14.1.4 Environment, Safety and Health - Legal and Compliance requirements

Based on the needs and expectations of EQ RESOURCES and interested parties, the compliance obligations for the IMS are as follows.

- Mandatory obligations including:
  - requirements from governmental entities or other relevant authorities;
  - international, national, state and local laws and regulations;
  - requirements specified in EQ RESOURCES procedures, licenses, permits or other forms of authorisation;
  - orders, rules or guidance from regulatory agencies.
- Agreements with Cronimet Australia pty ltd.
- Obligations arising under contractual arrangements with suppliers.
- Environmental commitments.
- Relevant organisational or industry standards.

Any amendments to the current legislation or other legal requirements shall be incorporated into the IMS. Relevant amendments or additional requirements are communicated to workers via Pre-Start meetings, Toolbox Talks, Induction, Noticeboards, Alerts and/or Bulletins.

The current version of applicable Acts and Regulations are available through the EQ RESOURCES subscriptions to the SafetyLaw and EnviroLaw website. The subscriptions to SafetyLaw and EnviroLaw provide regular email alerts relating to legal changes and other related safety, health and environmental matters. The email is reviewed by the Safety, Health, Environmental & Training Dept. Any identified relevant concerns are actioned and communicated as required.

All EQ RESOURCES Managers have access to the SafetyLaw & EnviroLaw website and all workers at EQ RESOURCES can request access by discussing with their Manager.

Compliance obligations have and will continue to be taken into consideration when establishing, implementing, maintaining and continually improving this IMS.

14.1.5 IMS Planning Action

All identified corrective actions are maintained in the EQ RESOURCES Corrective Action Register. The Site Senior Executive is responsible for the EQ RESOURCES Corrective Action Register. As a minimum the EQ RESOURCES Corrective Action Register is reviewed on a monthly basis, at the management meeting or when:

- acts, legislation, statutory requirements change;
- new risks and/or hazards have been identified;
- following a quality, environment, safety and health incident;
- for identified non-conformances;
- where the outcomes of the investigation have identified new hazards and/or risks; and/or
- new knowledge or appreciation of a hazard is obtained through inspections or any other form of hazard identification.

15 IMS Objectives and Planning

15.1.1 IMS Objectives

The quality, environmental, safety and health objectives of EQ RESOURCES is to undertake all activities at EQ RESOURCES as prescribed in this IMSM.

EQ RESOURCES's quality, environmental, safety and health objectives will be reviewed annually during the Management Review meeting. EQ RESOURCES quality, environmental, safety and health objectives shall:

- be consistent with the quality, environmental, safety and health policies;
- be measurable;
- take into account:
    - applicable requirements;
    - the results of risk and opportunity assessments;
    - the findings of consultation with workers;
- be relevant to conformity of products and to enhancement of customer satisfaction;
- be monitored;
- be communicated;
- be updated as appropriate.

The requirements associated with the setting of Objectives and Targets, including planning, implementation, monitoring, corrective action and recognition are detailed in EQ RESOURCES procedure Health and Safety Objectives (*EQR-SAF-PRO-0056 Health and Safety Objectives*) the procedure applies to quality, environmental, safety and health and all Manager/Supervisors and Workers at EQ RESOURCES.

15.1.2 IMS Objectives Actions

The objectives, targets, actions and monitoring metrics will be recorded on the EQ RESOURCES Quality, Environment and Health & Safety A3 Business Plans, actions identified will be added to the EQ RESOURCES corrective action register. To achieve the EQ RESOURCES quality, environmental, safety and health objectives, the EQ RESOURCES A3 Business Plan includes what will be done, what resources will be required, who will be responsible, when it will be completed and how the results will be evaluated.

The Management Review Meeting will assess past quality, environmental, safety and health objectives and targets. The management review meeting will identify the quality, environmental, safety and health objectives for the coming year.

16 Resources

16.1.1 General

Resource requirements to achieve IMS objectives and meet the compliance obligations are identified through an annual budget commencing in December of each year. Managers review resourcing requirements in October and November of each year and provide the review outcomes to the Site Senior Executive and CEO in December. A meeting is held between the managers, Site Senior Executive and CEO to prioritise and confirm the resource requirements. The CAPEX is then submitted to the Board for approval at the director's meeting

Where additional resources are required to fulfil the requirements in accordance with the IMS, these will be communicated with the Site Senior Executive.

16.1.2 People

EQ RESOURCES has appointed a Health, Safety, Environment & Training Consultant to oversee the Integrated Management System. External resources are utilised to assist with the IMS. The HSET has a number of technicians and other employees who assist in the collection of quality data for reporting and monitoring. The Site Senior Executive and Production Foreman monitor and ensure quality product, worker health and safety and environmental values are maintained and delivered as required.

16.1.3 Infrastructure

EQ RESOURCES site includes sufficient infrastructure for product quality, environmental protections and worker Safety and health requirements. The site has a laboratory for analysis of product, infield equipment to monitor product quality, safety & environmental equipment and storage facilities for product samples, including electronic storage for report record keeping.

16.1.4 Operational Environment

EQ RESOURCES maintains an Equal Opportunity, Harassment and Bullying policy. All employees have access to and understand the requirements of the policy. The policy includes social and psychological aspects. The operation has an extensive Health and Safety Management system that protects employee's physical safety.

16.1.5 Monitoring and Measuring Resources

All environmental health, safety and quality monitoring and measuring equipment is calibrated at specific intervals and/or prior to use as per the manufactures recommendation. All records of calibration are maintained, all equipment has a unique identifier.

To ensure valid and reliable product analysis results EQ RESOURCES maintains fit for purpose equipment. The equipment includes X-ray Fluorescence (XRF) Spectrometer, Analytical Balances and pH, dissolved oxygen, temperature, conductivity and turbidity meters, gas testers, alcholizers.

16.1.6 Organisational Knowledge

EQ RESOURCES determines the knowledge necessary for the operation of its processes and to achieve conformity quality, environmental, safety and health and described in this IMSM. When addressing changing needs and trends, EQ RESOURCES considers its current knowledge and determines how to acquire or access any necessary additional knowledge and required updates.

17 Competence

EQ RESOURCES ensures that all employees and contractors working under their responsibility are appropriately trained and competent to undertake activities to achieve the quality, environmental, safety and health objectives. Where specific competencies are required for significant risk activities, these are identified in the quality, environmental, safety and health procedures. Resources necessary for inductions and department-specific quality, environmental, safety and health training will be identified by managers and provided by EQ RESOURCES.

All training provided by EQ RESOURCES is competency based and closely aligned to the Australian Quality Training Framework.

Where required EQ RESOURCES utilises a Registered Training Organisation (RTO) to assist in the assessments and training to ensure compliance with the most current standards.

All training shall be conducted by a Certified Trainer or designated competent employee who shall mentor the trainee.

Quality, environmental, safety and health training at EQ RESOURCES will take the form of one or more of the following.

- Site General Induction;
- Visitor Induction; and/or,
- Specific quality, environmental, safety and health training courses (in-house or external).

All competency records are maintained on the individuals' personal files. NOTE: RII undertaken by an RTO keep records for their compliance and supply EQ RESOURCES with the relevant certificate

18 Awareness

The Safety, Health, Environment & Training Dept is required to maintain and update the quality, environmental, safety and health component of the Site General Induction and Visitor Induction. All new employees and contractors will undertake a Site General Induction or Visitor Induction prior to commencing any works on-site. The induction packages are reviewed by the Safety and Health Dept at least every two years to ensure that content reflects current circumstances. The induction provides EQ RESOURCES employees and contractors with an overview of the quality, environmental, safety and health policies, relevant quality, environmental, safety and health objectives, compliance obligations, and their contribution and responsibility to the effectiveness of quality, environmental, safety and health management at EQ RESOURCES.

19 Communication

19.1.1 General

19.1.2 Internal Communication

Effective internal communication is integral to the performance of the IMS. The type of communication undertaken at EQ RESOURCES to communicate the roles, responsibilities and expectations of the IMS differs depending on the position within the organisation, as detailed below.

19.1.3 Management team

Internal communication networks and regular meetings exist within the management team (Dept weekly planning meeting, Dept pre-shift briefings). Within this system, quality, environmental, safety and health management is a mandatory agenda item, which ensures that quality, environmental, safety and health matters are raised and discussed at management level. The expectations for each Dept in relation to the IMS are communicated in the quality, environmental, safety and health procedures and changes to the IMS will be discussed with each Dept as required.

Any outcomes of the Internal Audit and/or Management Review will be communicated to the management team during the Dept weekly planning meeting.

19.1.4 All personnel and contractors (Workers)

Quality, environmental, safety and health requirements and issues are communicated by managers to staff and contractors through one or more of the following inductions, departmental pre-start meetings, toolbox meetings and noticeboards. Other methods of communication may include phone calls, project-specific meetings and emails.

19.1.5 Environmental, safety and health incident and emergency reporting

Environmental, safety and health incidents are identified, documented and, as required, corrective actions developed to prevent a recurrence of the non-conformance and/or incident.

All non-conformance, environmental, safety and health incidents are reported by the involved worker to their supervisor immediately. The employee must complete the *Non-conformance Report Form* (EQR-SAF-FOR-0003) or the *Incident-Injury Report Form* (EQR-SAF-FOR-0005). The completed form is submitted to the Safety and Health Manager within the shift the incident occurred.

In the event of a:

- Environmental incident, the HSET Dept
- safety and health incident the HSET Dept

must be notified as soon as possible, in accordance with the *Emergency Management Plan* (EQR-SAF-PLN-0003). The relevant Manager will assess the severity of the incident and will determine the next course of action, investigation and communication as required. The outcomes of incident investigations will be reported to the relevant managers.

19.1.6 External Communications

There is an expectation, where required, quality, environmental, safety and health matters will be communicated to the relevant interested parties.

As documented in EQ RESOURCES's *Incident Notification and Investigation Procedure (EQR-SAF-PRO-0016)* any approach by the Media should be immediately reported to the Senior Site Executive. During an emergency, the affected workplace is to be closed to all personnel, giving access only to Emergency Services, Police and government officials. The only comment that should be made to the Media is that a Senior Company Representative may supply details and information at a later date. No other comment should be made as statements made can be used in litigation.

The HSET Dept, in consultation with the Site Senior Executive and CEO, is authorised to communicate/correspond with the customer or other external parties regarding quality and/or environmental issues. The HSET Manager may delegate this authority with approval from the Site Senior Executive.

The HSET Dept, in consultation with the Site Senior Executive and CEO, is authorised to communicate/correspond with the external parties regarding safety and health issues. The HSET Dept may delegate this authority with approval from the Site Senior Executive.

Communication on significant quality, environmental, safety and health matters with interested parties will be as directed by the CEO. Notifiable incidents are to be reported to the relevant managers and the Site Senior Executive.

Complaints Management

Any complaints received from the general public or other parties will be treated with respect. Complaints will be managed as per *EQR-QAL-PRO-0003 Complaints Management* procedure. The Site Senior Executive will maintain a Complaints Register for the site. All complaints will be referred to the Site Senior Executive who, in consultation with the relevant managers, will direct an appropriate course of action relating to the complainant's concerns.

New entries to the Complaints Register will be included in the EQ Resources Monthly Report prepared by the Site Senior Executive and provided to the CEO.

20 EQ RESOURCES Document Control

20.1.1 General

Documented information in the form of processes, plans, forms and procedures are developed and maintained to aid the effective operation of the IMS. All quality, environmental, safety and health documented information will be stored on the EQ RESOURCES network and/or in hard copy at the EQ RESOURCES site. Quality, environmental, safety and health documented information will be retained for a period of not less than five years or in accordance with other requirements, refer to section 7.5.3 Document Control below.

20.1.2 Creating and Updating

EQ RESOURCES *Document Control Procedure* (EQR-ADM-PRO-0001) describes the required practices for the creating and updating of documents. The procedure includes the creation, naming, updating, review and approval requirements.

20.1.3 Document Control

Responsibilities and processes for control of EQ RESOURCES's documented information are outlined in EQ RESOURCES's *Document Control Procedure* (EQR-ADM-PRO-0001).

This IMS Manual is a controlled document. The controlled copy is the digital version available on the EQ RESOURCES *Document Register* (EQR-ADM-REG-001). All printed copies of this document are uncontrolled and are marked "UNCONTROLLED WHEN PRINTED" in the footer.

Documents maintained for the IMS include, but are not limited to, the following.

- Communications with interested parties.
- Managers' weekly planning meeting.
- Managers' pre-shift briefings.
- Departmental pre-start meetings.
- Community complaints.
- Incident reports.
- Non-conformance reports
- Monitoring results.
- Sampling results.
- Calibration records.
- Training records.

20.1.4 Control of Records

Records shall be kept of all tasks and activities which relate to the IMS and to operational aspects which have the potential to affect the quality of the product, safety and health of people or the environment.

The records to be kept, shall include records required by acts, regulations, statutory codes of practice, and required by Australian Standards referenced in acts, regulations and statutory codes of practice.

The site senior executive must ensure the following records are kept as defined in the following table:

Document	Records Required	Location	Responsibility	Privacy Requirement	Retainment Period	Disposal Method
Monitoring air-borne contaminate level s	Results	Electronic Network	HSET Dept	No	30 Years	Non-Secure
RII Certificates	Training	Electronic Network	HSET Dept	No	While in control	Non-Secure
Confined Spaces	Risk Assessment	Electronic Network	HSET Dept	No	28 Days	Non-Secure
Confined Spaces	Entry permit	Electronic Network	HSET Dept	No	2 Years	Non-Secure
High Risk Work	Licences	Electronic Network	HSET Dept	Yes	While in control	Secure
Electrical work on energised equipment	Permit	Electronic Network	Electrical Supervisor	No	2 Years	Non-Secure
Records of plant required to be registered	Tests Inspections Maintenance Commissioning De-commission Alterations	Electronic Network	Maintenance Manager	No	While in control	Non-Secure
Manifest of hazardous chemicals	Manifest	Electronic Network	Stores Manager	No	While in control	Non-Secure
Firefighting equipment	Test	Electronic Network	HSET Dept	No	While in control	Non- Secure
Health Monitoring	Records	Electronic Network	HSET Dept	Yes	30 Years	Secure
Hazardous chemical exposure	Record	Electronic Network	HSET Dept	No	30 Years	Secure
Asbestos	Register	Electronic Network	HSET Dept	No	While in control	Non-Secure
Asbestos health monitoring	Records	Electronic Network	HSET Dept	Yes	40 Years	Secure
Asbestos	Training Records	Electronic Network	HSET Dept	No	5 Years	Non-Secure
Workplace Medicals	Records	Electronic Network	HSET Dept	Yes	70 Years	Secure
Health and fitness assessments	Records	Electronic Network	HSET Dept	Yes	70 Years	Secure
Mines Inspector Reports	Records	Mines Register and Electronic	SSE and HSET dept	No	While in control	Handover to Operator (Owner)
Electrical Systems	Records	Electronic	Electrical Manager	No	While in control	Non-secure

Document	Records Required	Location	Responsibility	Privacy Requirement	Retainment Period	Disposal Method
Environmental Monitoring	Records	Electronic Network and Hard Copy	HSET Dept	No	5 Years	Non-Secure

Records shall be traceable to tasks and activities, products or services, and the procedure or work instruction to which the record relates. EQ RESOURCES preference is for records to be kept in electronic format. Physical records shall be stored in such a location so as to prevent damage or deterioration. Records shall be stored in a manner so as to ensure that all records are easily retrievable and accessible to personnel who may need them.

Destruction of records shall only be carried out if appropriately authorised and if the record is no longer needed (e.g. the prescribed retention period has been reached). Destruction shall be carried out so that it is complete and the confidentiality of the information is preserved. Evidence of the destruction shall be recorded.

Medical records shall be treated as strictly confidential. Medical records shall be kept secured (locked) and be kept indefinitely. A site senior executive may only obtain a worker's medical record with the worker's written consent. If required, medical recommendations, based on the medical records but excluding medical details, may be given by the SSE to the person's Line Manager. The SSE must not disclose to anyone, other than the worker or someone with the worker's written consent, the contents of the worker's medical record.

21 Operational Planning and Control (Quality)

EQ RESOURCES operations consist of mining, crushing & screening, jigging, gravity separation processing over shaker tables, bagging final concentrate, loading to truck for shipping. Brief descriptions of each process, including planning and control elements, are provided below:

21.1.1 Mining:

Mining areas are determined by conducting sample analysis within the mine lease environment. Samples are analysed to determine the quality of the ore / tungsten and plans on the blending and extraction strategy are determined. Pre-stripping removes the contaminated top soil and vegetation. The pre-stripping material is retained and returned to the mined area during the rehabilitation process.

Ore is extracted using an excavator & haul truck & stockpiled in the crushing areas. Periodic samples are obtained from the face of the mine the results of the samples are communicated, recorded and maintained.

21.1.2 Crushing & Screening

The stockpiles are then fed into a mobile or fixed crushing & screening plant to bring the product into specification and classify the product size. The rejected material from the Ore-sorter is then turned into Quarry products. High grade Material that is -6mm is sent to retreatment for processing by haul trucks. (Slurry pump system planned in the future).

21.1.3 Wet Screen

The stockpiled material from the quarry is the fed into a hopper which goes by conveyor over a weightometer to determine the tonnes per hour & into a screen which separates the -6mm high grade material into appropriate particle sizes, water is used to help separate the material & pass through the screen more easily ensuring the right particle size goes to the Jig.

21.1.4 Jigging

The material from the wet screen is feed into the jig as slurry by pumps. The heavy material (tungsten) naturally goes down using gravity & the pulsing motion of the jig, through the ragging & bed material to gather in the bottom of the jig hopper to be pumped to the tabling circuit for further separation. The lighter material that is pumped onto the jig flows off into a tank which is pumped to tails.

21.1.5 Gravity separation

After the material has gone through the jig it is pumped onto tables. The tables are set at about a 15^0 angle & use a rocking motion to force the heavy material to the top of the table & lighter waste material to fall off the sides or bottom of the table the heavy material is pumped to a final table for further purification, lighter material is pumped to tailings.

21.1.6 Bagging of concentrate

After the concentrate has gone over the final table it is funnelled into a 1 tonne bulk bag. The cons is weighed & a sample is taken in a marcey bucket & weighed to determine purity in %. The bags will be reweighed again before shipping to get a true weight after moisture loss.

21.1.7 Loading trucks

Samples are analysed for quality and record keeping requirements. Trucks are loaded as per requirements so that when the material is to be loaded into sea containers it will be within loading weight requirements.

EQ RESOURCES has adequate staff and financial resources to provide a high quality product to their customers. The production process includes an integrated process control system (SCADA) with associated interlock and quality controls.

All sample records are managed and maintained. EQ RESOURCES prides itself on the ability to demonstrate confidence in its product quality and conformity at all production stages, to the customer's needs.

Outsourced processes are controlled through evaluation of contractors, as documented in the *Contractor Management Procedure* (EQR-SAF-PRO-0017) and EQ RESOURCES Procurement processes.

21.1.8 Products and Services

21.1.9 Customer Communication

EQ RESOURCES provides information relating to its products via the EQ RESOURCES website. In addition to this information, marketing personnel employed by EQ RESOURCES provides existing/potential customers with relevant information about EQ RESOURCES's product. Customer communication is the responsibility Mt Carbine Operations.

EQ Resources head office in Melbourne manages all inquiries, contracts and orders relating to the purchase, provision and receipt of bulk Tungsten to Cronimet Australia.

The receipt and response to customer feedback is the responsibility of Mt Carbine Operations. EQ RESOURCES do not directly communicate with the customers that purchase their Quarry product.

EQ RESOURCES do not handle or control any customer property.

EQ RESOURCES receives shipping instructions and schedules from Cronimet Australia. These instructions and schedules are based on Cronimet Australia communications. EQ RESOURCES has not established any specific requirements for customer communications; all product and service communications are with Mt Carbine Operations.

21.1.10 Requirements for Products and Services

EQ RESOURCES have on-site statutory obligations relating to exploration, mining and rehabilitation that are enforced by the Qld Department of Natural Resources, Mine and Energy, the Qld Department of Environment and Science. No additional statutory or regulatory requirements exist with regards the mining, processing & transporting tungsten (i.e. from a quality/production perspective).

Those considered necessary by EQ RESOURCES (i.e. the requirements for the product to be offered to customers) apply to ensuring that specifications relating to chemical composition and physical parameters (i.e. correct particle size analysis) are able to be met.

21.1.11 Review of Products and Services

EQ RESOURCES supplies quality bulk Quarry products. Existing production, monitoring, and sampling systems ensure quality product. The supply and review of product is based on information provided by Mt Carbine Operations and relates to grade, quality, quantity and being free from any contamination.

Estimated times of arrival and departure of vessels are defined on the Shipping Schedule that is provided by EQ Resources to Cronimet Australia.

Delivery time of product to the customer after leaving port is the responsibility of the respective shipping company and is dependent on any demurrage, shipping schedules, weather conditions etc. Estimated times of arrival of the shipped product from port to the customer are defined on the shipping schedule. EQ RESOURCES currently have no post-delivery requirements.

21.1.12 Changes of Products and Services

The shipping schedule is received from Cronimet Australia via email on a monthly frequency by several relevant senior managers/personnel employed by EQ RESOURCES in Mt Carbine. The weekly schedule is identified by the issue date in the title, which is also defined on the actual schedule. The schedule states that "all listed schedules are subject to change".

In the event that there are changes to the Shipping Schedule or the type of product to be loaded, the changes are communicated to the relevant EQ RESOURCES personnel via the re-issue of the Shipping Schedule from Cronimet Australia.

21.1.13 Design and Development

EQ RESOURCES do not design or develop products; product is mined, washed and supplied as is.

21.1.14 Externally Provided Processes, Products and Services

EQ RESOURCES from time to time will require externally provided processes, products and services, including;

Products:

- Chemicals such as oils, coolants, hydraulic fluids and
- Fabricated and/or replacement equipment and machinery.

Services:

- Routine and shutdown maintenance
- Specialist consultants
- External laboratory services
- External labour

EQ RESOURCES procurement processes include operational, repairs & maintenance and capital expense requests. All requests require approval based on the delegation of authority levels. Prior to commitment three quotes, based on EQ RESOURCES's requirements, will be sourced. Selection of the preferred supplier will be confirmed via the issue of an approved purchase order.

Requirements associated with securing the provision of externally provided products and services is the responsibility of EQ RESOURCES's Purchasing Manager. Requirements for the supply of goods and services are specified in EQ RESOURCES contracts, contract conditions and purchase orders. Terms and conditions include quality requirements. Contracted services comply with EQR-SAF-PRO-0017 Contractor Management procedure.

EQ RESOURCES Supporting Documents

- EQ RESOURCES-SAF-PRO-0017 Contractor Management procedure

22 Control of Production and Service

Control of product is administered through the determination of EQ RESOURCES's Quality Specification, inclusive of chemical composition (minimum and maximum specifications for product are defined) and particle size distribution.

EQ RESOURCES maintains a space to stockpile bagged tungsten concentrate. Quarry products for road aggregates.

EQ RESOURCES maintain approximately 150,000,000 tonnes of capacity for their product stockpile. EQ RESOURCES can produce Quarry products & Tungsten concentrate at the same time. Production Planner worksheet is utilised by the Production Manager to plan and oversee the production requirements as per EQ RESOURCES's shipping schedule provided by Cronimet Australia.

EQ RESOURCES has no control over the sea conditions for shipping vessels (i.e. vessels at sea can arrive early or be delayed). EQ RESOURCES's Site Senior Executive communicates with Cronimet Australia to discuss container storage prior to vessel arrival.

EQ RESOURCES's PASS reports are utilised to formally specify the following on a daily frequency;

- daily production;
- the quality produced;
- the location of different grade products on the stockpiles;
- shipping bag levels and
- the analytical results of these.

Critical spares are on hand at stores. The critical spares are based on historical requirements and are managed by the FIIX system and utilises a minimum and maximum stock holding requirement.

23 Identification and Traceability

EQ RESOURCES processes include the identification and traceability of Tungsten/product through the allocation of a unique numerical identification system for the following:

- drill samples;
- production samples and
- Bag samples

All records are managed and maintained by the quality department.

23.1.1 Property Belonging to Customers or External Providers

EQ RESOURCES do not source, use or own any property belonging to any of its customers. Tools, materials and equipment utilised by EQ RESOURCES on-site is owned by EQ RESOURCES.

23.1.2 Preservation

EQ RESOURCES storage and preservation processes are established and implemented for drilling, production and samples.

Drilling samples are held in EQ RESOURCES's sample shed. Drilling samples are identified by year, drill-hole number, depth of sample (i.e. sampled at 2 m intervals). Drill samples are required to be held indefinitely.

Bag samples are stored by EQ RESOURCES and retained for a period of not less than 12 months. Bag samples are identified by, sample sequence number, (1111). Samples greater than 12 months old are authorised to be discarded.

Production samples are stored by EQ RESOURCES and retained for a period of 6 months (weekly batches) Production samples are identified by sample sequence number (1111). Samples greater than 6 months old are authorised to be discarded.

In addition to the preservation of laboratory samples, preservation of outputs in relation to EQ RESOURCES's QMS is applicable to:

- Maintaining moisture control of the product prior to and during loading of trucks to ensure that it remains within required specifications (i.e. < 5%);
- Ensuring that the correct grade of product is loaded as per the customer's requirements and
- Maintaining the control of any potential contamination whilst the product is bagged.

Product stored in bags prior to and during loading is preserved via;

- Not allowing loaders or other mobile machinery on to move bags unnecessarily and
- Ensuring trucks are fully covered so when loading it reduces the chance of rainfall on product being conveyed to ensure moisture levels remain within specification.

23.1.3 Post-Delivery Activities

On completion of the loading of product onto trucks, post-delivery activities are administered by the shipping company; the customer and/or Cronimet Australia.

The only exception occurs if a complaint is received . The Site Senior Executive will escalate the complaint to the HSET and Production Manager. The HSET and/or the Production Manager will investigate, determine the cause and corrective actions required to prevent recurrence of the event and report back to the Site Senior Executive. The Site Senior Executive will inform Cronimet Australia who are responsible to communicate the findings and actions to the relevant parties.

EQ RESOURCES's responsibility for the product ceases at the completion of loading (i.e. when the product has entered the Truck).

24 Control of Changes

EQ RESOURCES's *Change Management procedure* EQR-SAF-PRO-0034 includes the requirements associated with changes and modifications to existing operations, including changes to hardware (plant, equipment, materials, etc.), plant control software, operating or maintenance procedures, operating conditions, raw materials used, new products, process formulations, responsibility and authority, organisational structure, or any other change.

The Change Management procedure will be applied to any process or product changes, records of all changes must be maintained.

EQ RESOURCES Supporting Documents

- EQR-SAF-PRO-0034 Change Management
- EQR-SAF-FOR-0060 Change Management Form

24.1.1 Product Quality:

Determination of the quality of product placed on the main EQ RESOURCES bag stockpiles is by internal analysis utilising XRF, to confirm the chemical composition of the Tungsten.

Determination of the quality of product placed on bag stockpiles and loaded into trucks is confirmed by the use of composite sampling prior to shippment.

Inter-laboratory analysis of a sample of loaded product is also conducted by ALS in Brisbane (NATA Accredited Laboratory).

Documented information that is retained on the release of product is:

- internal chemical composition by on-site XRF analysis;
- external analysis by ALS of product that has been loaded onto ships and
- the quantity of product that has been loaded, which is determined by weighing the product onsite.

Waste product from the processing plant (i.e. mainly heavy mineral particles that are rejected based on their specific gravity) is pumped, as slurry, to a rejects stockpile. EQ RESOURCES utilise a SCADA system within the plant.

Determination of the quantity of product loaded onto vessels is measured in tonnes per bag utilising the quarry weighbridge installed at/on:

- Mt Carbine Quarrying Operations

All meters are calibrated on a annual frequency by trained and competent 3rd party personnel in accordance with predefined schedules and instructions specified in the equipment manuals for these instruments.

In the event of any technical issues associated with these instruments a weighing technician from a competent external provider is utilised to assess and repair the fault.

24.1.2 Nonconforming Outputs

Processes relating to the control of non-conforming outputs exist and are utilised at EQ RESOURCES. Non-conformance events are reported, investigated and recorded on the Corrective Action Register, identified preventative actions are tracked, reported on and closed-out.

As a minimum non-conforming product events are required to be raised by senior EQ RESOURCES personnel where product:

- is detected to be incorrectly placed on the wrong stockpile;
- does not meet required chemical or physical specifications, is placed on the stockpile;

The above list is critical to customer satisfaction, it is expected that all non-conforming product issues are reported appropriately.

25 Operational Planning and Control (Environment)

The Environmental Programs (Eps) (maintained on the EQ RESOURCES Network) are used by EQ RESOURCES to establish, implement, control and maintain processes to meet the requirements of the IMS and implement the environmental objectives identified in A3 Environmental Business Plan. The Environmental Monitoring and Reporting System (EMRS) records information pertinent to the implementation of the IMS. The data is used to identify potential environmental risks that require management and to assess achievement of the environmental objectives.

Changes to activities on-site, which may affect the EMS, can be planned or unintended changes. EQ RESOURCESPL controls these changes by reviewing the potential risk and taking action to mitigate any adverse effects, as necessary. Changes to EQ RESOURCES activities are identified through the managers' weekly planning meeting, managers' pre-shift briefings, departmental pre-start meetings, incident investigation processes. Risks and controls associated with changes are determined through the risk assessment process.

Outsourced processes are controlled through evaluation of contractors, as documented in the *Contractor Management Procedure* (EQR-SAF-PRO-0017).

During planning and design of activities or procurement, the environmental risk associated with the activity or item of procurement is reviewed and the relevant controls are identified. For example, the waste management hierarchy of a product or process is considered, *ie* substituting a hazardous chemical for a less hazardous chemical, using a material that can be re-used or recycled at the end of life.

When procuring new infrastructure or equipment for EQ RESOURCES, a life cycle perspective will be applied. This will include consideration of the expected lifespan and efficiency of the item to be procured, as well as how the item will be managed at end of use. Maintenance requirements of the new infrastructure or equipment will also be considered to ensure that potential waste generation is minimised.

EQ RESOURCESPL use a computer program (FIIX) to manage one-off and routine maintenance work requirements, including inspection and maintenance of environmental controls, tools and processes. Preventative Maintenance (PM) work requirements are set up in FIIX, and include assigning responsibility, tasks and timeframe for completion. PM requisitions are then raised by the FIIX system at the nominated time and provided to relevant personnel for completion by the required date (*eg* one-off repair request, routine maintenance checklists). If the PM tasks identify further maintenance work is required, these tasks are added to the FIIX system.

25.1.1 Environmental emergencies

The requirement for Emergency Management and Contingency Preparedness is referenced in the EQ RESOURCES Emergency Management Plan (EQR-SAF-PLN-0003). Accordingly, EQ RESOURCES is required to identify potential emergency situations and document emergency procedures for preventing and mitigating associated illness, injury or

other emergency situations. These procedures will be reviewed, revised and tested periodically, where practicable, and in accordance with the Emergency Management Plan.

25.1.2 Environmental incidents

All environmental incidents identified on-site will be documented on the *Incident/Injury Report Form* (EQR-SAF-FOR-0005). All accidents and incidents will be discussed at the managers' weekly planning meeting and managers' pre-shift briefings and daily departmental pre-start meetings. Corrective actions are maintained on the EQ RESOURCES *Corrective Action Register* (EQR-SAF-REG-0005) by managers/supervisors.

26 Operational Planning and Control (IMS)

26.1.1 Eliminating Hazards & Reducing Risks

Risk planning and management is central to EQ RESOURCES activities. EQ RESOURCES operations are only conducted when the risk is within acceptable limits and as low as reasonably practicable (ALARP).

The risk planning and management processes developed and implemented at EQ RESOURCES aim to provide a logical and systematic method of identifying, analysing, evaluating, treating, monitoring and communicating risks.

The following hierarchy of controls is applied to mitigate risk to a level which is ALARP:

- Elimination/Removal
- Substitution
- Engineering/Isolation Control
- Administration
- Personal Protective Equipment
- Human Behavior

The hierarchy of control is to be used to control hazards identified for **all** risk management processes. Less reliable control measure (e.g. administrative, PPE or safe behaviour controls) should only be implemented as part of a holistic control strategy in addition to controls from the other, more effective categories, or on their **own** where the level of current risk is ALARP.

26.1.2 Risk Management – Principles and Guidelines

EQ RESOURCES risk management is developed to comply with the requirements of *AS/NZ ISO 31000:2009 Risk Management – Principles and Guidelines*. This standard calls for the following elements:

- Establish the context:
    - Establish the strategic, organisational and risk management context in which the rest of the process shall take place. Criteria against which risk shall be evaluated should be established and the structure of the analysis defined.
- Identify risks:
    - Identify what, why and how things can arise as the basis for further analysis.
- Analyse risks:
    - Determine the existing controls and analyse risks in terms of consequence and likelihood in the context of those controls. The analysis should consider the range of potential consequences and how likely those consequences are to occur. Consequence and likelihood **may** be combined to produce an estimated level of risk.
- Evaluate risks:

- Compare estimated levels of risk against the pre-established criteria. This enables risks to be ranked so as to identify management priorities. If the levels of risk established are low, then risks **may** fall into an acceptable category and treatment **may not** be required.

- Treat risks:
  - Accept and monitor low-priority risks. For other risks, develop and implement a specific management plan, which includes consideration of funding.
- Monitor and review:
  - Monitor and review the performance of the risk management system and changes, which might affect it.
- Communicate and consult:
  - With workers and other stakeholders; the system requirements and the effectiveness of the agreed controls.

More detail can be found in *AS/NZS 4360:2004 Risk Management*.

Safety and health hazards are identified and managed through a combination of the following processes:

- Existing and historical knowledge of workers
- Internal and external assessments audits
- Job Safety Observations
- Workplace Inspections
- Pre-Start Checks
- Wait Take Five's (WTF's) and *EQ RESOURCES-SAF-FOR-0003 Non-Conformance Report*
- JSEA's
- Team Based Risk Assessments
- Management of inspections
- Analysis of past incident causation
- Analysis of past emergency situations
- Employee/contractor complaints
- Hazard Log detailing corrective measures, timelines and responsibilities
- Industry reports, Safety Alerts and communications

26.1.3 IMS Control of Work Procedures

EQ RESOURCES's IMS includes policies, procedures, forms, plans and registers. These procedures and their associated forms, plans and registers are integral to the proper implementation of EQ RESOURCES's Integrated Management System.

EQ RESOURCES maintains a controlled document register *"EQR-ADM-REG-0001 Document Register"* always refer to the document register to access the current version of control of work procedures.

Access to the Document Register is controlled and available by contacting the IMS Manager.

27 Management of Change

EQ Resources Change Management (EQR-SAF-PRO-0034) procedure outlines processes for the prevention of non-compliances resulting from changes in the workplace at EQ RESOURCES operations. The scope covers changes initiated by the Company, as well as changes initiated by other parties, planned/unplanned and sudden or gradual changes, with a requirement that high risk areas be identified.

EQ RESOURCES Supporting Documents

- EQR-SAF-PRO-0034 Change Management
- EQR-SAF-FOR-0060 Change Management Form

28 Procurement

All purchasing of materials, equipment and services shall be undertaken so as to ensure that any safety and health considerations are taken into account.

Hazards are to be identified and assessed prior to the hire or lease of equipment or the supply of services. Verification must be supplied that the delivery of equipment or supply of services complies with appropriate safety and health specifications.

Procedures/JSEA's shall be developed and implemented for the safe handling and storage of hazardous goods and substances. A Safety Data Sheet must accompany all hazardous materials brought on to site.

EQ RESOURCES Supporting Documents

- EQR-ADM-PRO-0002 Procurement

29 Contractor Management

Contractors are pre-approved according to EQ RESOURCES Contractor Management Procedure (EQR-SAF-PRO-0017) prior to attending site. Contractors approved by the SSE receive an induction before working on site. The induction covers site procedures necessary for that particular contractor's role.

In the event that a contractor is required for a short term emergency task on the mine site (such as repairs to phone lines) then that contractor will receive the visitor's induction and remain under the supervision of a fully inducted person during their time on site.

All contractors are required to provide and maintain a safe and healthy work environment and are responsible, as a minimum, for performing work to EQ RESOURCES safety and health standards.

A Contractor Management Plan must be developed to **ensure** that contractors working at EQ RESOURCES are properly managed and supervised.

In addition the procedure lists the requirements for:

- The verification of contractors' competencies
- Valid insurances
- Verification that machinery is fit for purpose
- Contractors' health assessments

Contractors are required to supply details of employee's tickets, statements of attainments and relevant work history prior to operating on site. All workplace certifications (tickets) must be current and relevant to the workers planned work onsite. Contractors and their workers shall not be trained by EQ RESOURCES personnel unless authorised by the SSE. If the evidence is valid, reliable, authentic, current, sufficient and endorsed, the contractors' employee may be challenge tested and the authorisation process shall be completed.

The objective of this procedure is to allow contractors to work at the mine in such a way that their workers are not subject to an unacceptable level of risk from a safety and health point of view. This procedure applies to all contractors' personnel working at EQ RESOURCES and includes any subcontractors working for a contractor.

NOTE: Contractors under the relevant Act and Regulations are defined as Workers but for the definition of people contracted to work at EQ RESOURCES and not full times employees they are defined as Contractors just for the purpose of defining this in the manual.

EQ RESOURCES Supporting Documents

- EQR-SAF-PPT-0003 EQ Resources Site Induction
- EQR-SAF-TAA-0003 Visitors Induction

- EQR-SAF-TAA-0001 Site Induction Assessment Tool
- EQR-SAF-PRO-0017 Contractor Management
- EQR-SAF-FOR-0023 Mobile Equipment Familiarisation Checklist

29.1.1 Outsourcing

At EQ RESOURCES outsourced functions and processes do not occur. If for whatever reason there is a need for outsourced functions and processes these would be managed in accordance with current contractor and procurement procedures.

30 Emergency Planning, Preparedness and Response

EQ RESOURCES Emergency Response Management Plan (EQR-SAF-PLN-0003) minimises the level of risk to life, property and the environment as a result of an emergency situation.

The EQ RESOURCES Emergency Response Management Plan describes the immediate actions required by designated site personnel.

All personnel are required to undergo site and specific area inductions to familiarise themselves with locations of emergency equipment and evacuation points. Emergency contact details and procedures are provided during their induction.

An Emergency Management Plan has been developed and implemented to manage emergencies. The Plan outlines:

- Identification of potential emergency situations;
- Warning and alarm systems which are tested at regular intervals;
- Emergency organisations, responsibilities, skill and competency required to fulfil roles;
- Co-ordination and reporting to management;
- List of key personnel, contacts, back up and support services;
- An internal and external communication plan;
- Training plans and testing for effectiveness;
- Emergency rescue equipment available;
- Business continuity; and,
- Evacuation plans.

EQ RESOURCES have an Emergency Response Team (ERT) who have been trained in emergency response and are on call during rostered shifts and available to deal with all emergency situations.

EQ RESOURCES Supporting Documents

- EQR-ADM-FOR-0001 EQ RESOURCES Emergency Contacts List
- EQR-SAF-PLN-0003 Emergency Management Plan

31 Monitoring, Measurement and Evaluation

31.1.1 General

EQ RESOURCES, based on operational and customer requirements, have determined what needs to be monitored and measured; the methods for monitoring measurement and analysis, when the monitoring and measurement is to be performed and when the results from monitoring and measurement will be analysed.

31.1.2 Environmental Monitoring

An Environmental Management and Reporting System (EMRS) has been developed to monitor and report on information relevant to EMS environmental objectives. It is the responsibility of the HSET Manager to provide assistance as required and ensure responsible managers have completed relevant EMRS reports on a monthly basis.

Completed digital copies of the EMRS spreadsheet will be maintained on the EQ RESOURCES network drive by the HSET Manager, and can be accessed by each relevant manager.

Each month the HSET Manager will provide a summary of environmental matters as a component of the Mt Carbine Operations Monthly Report. Outstanding issues from the EMRS will be raised at managers' weekly planning meetings and managers' pre-shift briefings, as required.

Specific environmental monitoring is required under the EQ RESOURCES Environmental Authority (EA EPPR00438313).

31.1.3 Safety and Health Monitoring

It is essential to assess performance to evaluate progress against the requirements, targets, objectives, and to establish plans for continuous improvement.

To properly assess needs:

- EQ RESOURCES will conduct a systematic review of the corporate guidelines, standards, systems and processes to verify the current standards and controls in place
- Conduct audits and assessments at determined frequencies to measure the level of compliance and progress to the standards, and assist in the correction and prevention of any systemic issues
- Review performance and accountability processes to indicate progress or deviations for early corrections

EQ RESOURCES procedures for Management Review and Health and Safety Objectives detail the processes to be applied.

31.1.4 Inspections and Review Systems

Regular inspections on all areas of the operations are conducted to identify and rectify hazards. Workplace inspections are carried out by all Managers and personnel. This enables EQ RESOURCES to use a cross pollination of personnel and experience to help identify hazards and potential risks

The workplace inspections are completed regularly as per the inspection matrix. The Inspection Matrix includes the area to be inspected, when they need inspecting and who is responsible. The schedule is agreed with by the Site Senior Executive and in consultation with the workers to monitor the effectiveness of controls to mitigate risks

Actions identified from the workplace inspections are recorded in the EQR-SAF-REG-0005 Corrective Action Register detailing corrective measures, timelines and responsibilities.

All workplace inspection reports are maintained by the Safety Department on behalf of the Site Senior Executive

The SSE shall keep the workplace inspection reports for a period of not less than seven (7) years.

EQ RESOURCES Supporting Documents

- EQR-SAF-PRO-0042 Workplace Inspections
- EQR-SAF-PRO-0061 Management Review
- EQR-SAF-PRO-0056 Health and Safety Objectives

31.1.5 Customer satisfaction

Required specifications for EQ RESOURCES's Quarry product are directed from Department of main roads. The specifications are defined in a documented Specification Sheet. Customers communicate to Mt Carbine Office the product and specifications that are required. EQ RESOURCES maintain specific Product Quality Specification sheets, inclusive of laboratory analysis reports defining the physical and chemical specifications of each product.

Records relating to customer satisfaction are held by Mt Carbine Operations office.

31.1.6 Analysis and Evaluation

The extent of product analysis and evaluation conducted by EQ RESOURCES is defined in *Section 8.1.6 – Release of Products and Services* within this manual.

32 Evaluating Compliance ESH

32.1.1 Environmental Compliance

During the review of the obligations under State and Commonwealth Legislation an assessment of the compliance of EQ RESOURCES processes against current legislative obligations under State and Commonwealth Legislation will be undertaken.

Where the annual review of obligations and site-specific licences and permits, the internal audit (**Section 9.2**) or management review (**Section 9.3**) identifies processes that are not in compliance with current legislative obligations, the non-compliance will be addressed in accordance with the *Incident Notification and Investigation Procedure* (EQR-SAF-PRO-0016) and non-compliance/incident process (refer to *Incident/Injury Report Form* (EQR-SAF-FOR-0005). The non-compliance will be reported to the relevant State or Federal authority where relevant and corrected, or initiated where a longer process is required for correction, within one month of identification of the non-compliance. Corrective actions will be included in the *Corrective Action Register* (EQR-SAF-REG-0005).

32.1.2 Safety and Health Compliance

Periodic, at least annually, evaluation of compliance with applicable legal and other requirements will be planned using the EQ RESOURCES internal and external audit schedule, in addition, legal compliance system Safety-Law provides regular updates (at least monthly) to legal and other requirements. The internal and external schedule includes, amongst other things, the following:

- Legal Compliance Reviews
- Management systems
- Management plans
- EQ RESOURCES Policy & Procedures

Records of the findings, actions and changes required will be documented and retained, actions will be managed in the corrective action register.

33 Internal Audits

33.1.1 General

EQ RESOURCES internal audit program includes quality, environmental, safety and health procedure audits for compliance. The requirements of the international standards are audited by an external certification body, including annual surveillance and three (3) re-certification audits.

33.1.2 Internal Audit Programme

Internal audits are conducted to determine whether there is adequate implementation and maintenance of the system. Actual frequency of the auditing of individual work areas or operational aspects, shall be determined in accordance with the level of risk, scoped and documented. Audits are conducted in accordance with the *Internal & External Audit Schedule* (2017-2021 EQ RESOURCES Internal Audit Schedule). Unscheduled audits may be initiated, as necessary. Auditees shall be notified in advance of impending audits. Audit reports are maintained.

33.1.3 Auditors

Trained auditors shall be assigned to complete each audit. Auditors shall also be knowledgeable IMS related matters, as appropriate to the type and scope of the scheduled audit. Auditors shall be independent, objective and impartial, and shall be selected so as to ensure that they have freedom from bias or any other influences that may affect their objectivity.

33.1.4 Audit Process

Audits shall include as a minimum, a closing meeting, attended by the audit team and the auditee(s). Audits shall be conducted through examination of documents, practices, other evidence and interviews with personnel. The audits shall be conducted against relevant audit criteria:

- conformance with EQ RESOURCES requirements (i.e. policy, procedures and work instructions);
- compliance with all applicable legislative requirements;
- International Standard Organisation and/or Australian Standards Management System Requirements.

Personnel being audited (i.e. auditees) shall fully cooperate with the Auditor and provide any relevant information requested of them. Non-conformances shall be documented and prioritised based on risk. Corrective Actions shall be identified and recorded for each non-conformance. Key audit findings will be communicated to the management team and are an input to the annual management review process.

34 Management Review

IMS Management Reviews are conducted to ensure its continuing suitability, adequacy, effectiveness and alignment with EQ RESOURCES strategic direction of this IMSM. Reviews shall include assessing opportunities for improvement and the need for changes to the integrated management system, including the quality, environment, safety and health policies and quality, environment, safety and health objectives and targets. Procedure *EQR-SAF-PRO-0061 Management Review* describes the process to be followed. IMS Management reviews are carried out at least annually. The review meetings are attended by the EQ RESOURCES Senior Management team and the Environmental Coordinator.

34.1.1 Management Review Inputs

The management review shall be planned and carried out taking into consideration:

- the status of actions from previous management reviews;
- changes in external and internal issues that are relevant to the integrated management system;
- information on the performance and effectiveness of the integrated management system, including trends in:
    - customer satisfaction and feedback from relevant interested parties, including complaints;
    - the extent to which IMS objectives have been met;
    - process performance and conformity of products and services;
    - nonconformities and corrective actions;
    - monitoring and measurement results;
    - audit results;
    - the performance of external providers;
- the adequacy of resources;
- the effectiveness of actions taken to address risks and opportunities;
- opportunities for improvement.

34.1.2 Management Review Outputs

Management Review meetings are minuted using form *EQR-SAF-FOR-0100 Management Review Agenda* and records are maintained. Actions arising from the management review shall include:

- Opportunities for improvement;
- Any need for changes to the Integrated Management System; and
- resources needed to implement these improvements (i.e. financial and human resources).

Corrective actions identified during the Management Review are recorded in **Corrective Action Register**. Copies of Management Review minutes shall be available to interested parties.

EQ RESOURCES Supporting Documents

- EQR-SAF-FOR-0100 Management Review Agenda
- EQR-SAF-PRO-0061 Management Review
- EQR-SAF-REG-0005 Corrective Action Register

35 Improvement in General

Maintenance and improvement of the IMS is undertaken by the HSET Manager or nominated delegate.

The IMS Manual, Policies and Procedures are operational documents, *i.e.* they are to be maintained so that they reflect the current site practices and requirements.

EQ RESOURCES will determine and select opportunities for improvement and implement any necessary actions to meet quality, environment, safety and health requirements and enhance quality, environment, safety and health processes. The opportunities can be sourced from incidents, non-conformances, management review, corrective actions and/or customer complaints (as received from Mt Carbine Operations).

The improvements can include:

- improving products and services to meet requirements as well as to address future needs and expectations;
- correcting, preventing or reducing undesired effects;
- improving the performance and effectiveness of the integrated management system.

36 Incident, Nonconformity and Corrective Action

Incident, non-conformance and corrective actions at EQ RESOURCES are managed in accordance with the *Incident Notification and Investigation Procedure* (EQR-SAF-PRO-0016) and *Non-conformance Report* (EQR-SAF-FOR-0003). All identified corrective actions from incident investigation are recorded on the Corrective Action Register for follow-up and closure.

The level of investigation undertaken in response to an incident or non-conformance is dependent on the severity or potential severity of the incident or non-conformance. The Site Senior Executive ensures that all reported incident and non-conformance events are recorded and documented. The following provides an outline of steps taken when an incident or non-conformance occurs at EQ RESOURCES.

- The responsible manager or supervisor provides the Site Senior Executive, Workplace Health and Safety Manager or Quality Control and Environment Manager with an initial report of facts as soon as practicable.
- The responsible manager or supervisor completes *Incident Notification and Investigation Procedure* (EQR-SAF-PRO-0016) and the *Incident/Injury Report form (EQR-SAF-FOR-0005)* or *Non-conformance Report (EQR-SAF-FOR-0003*), giving full details of the event.
- The responsible manager or supervisor observes the scene to identify site and incident conditions, and records the conditions on the relevant form.
- Interviews are undertaken to gather information about the events leading to the incident or non-conformance.
- An analysis of the facts is undertaken.
- Conclusions are drawn regarding the direct and indirect causes of the incident.
- Recommendations are made for corrective actions to prevent the recurrence of similar incidents or non-conformances.
- Effective control measures are introduced.
- Feedback is given to interested parties on the incident or non-conformance causes and implemented control measures.

- The Site Senior Executive, HSET Manager closes out the *Incident Notification and Investigation Procedure* (EQR-SAF-PRO-0016) and *Incident/Injury Report form (EQR-SAF-FOR-0005) or Non-conformance Report (EQR-SAF-FOR-0003)* when satisfied that the investigation and corrective actions have been completed and when the effectiveness of corrective actions has been evaluated.

NOTE: Customer complaints are received by the Site Senior Executive via Mt Carbine Operations. The Site Senior Executive will forward the complaint to the HSET and Production Manager. The HSET and/or the Production Manager will investigate, determine the cause and corrective actions required to prevent recurrence of the event and report back to the Site Senior Executive. The Site Senior Executive will inform Mt Carbine Operations who are responsible to communicate the findings and actions to the relevant customer.

For customer complaints the Site Senior Executives is responsible for all required communications.

Incidents and non-conformances are discussed at the managers' weekly planning meeting (held each Monday), managers' pre-shift briefing (held each Tuesday – Friday), departmental pre-start meetings (held daily) and toolbox meetings, as relevant.

EQ RESOURCES Supporting Documents

- EQR-SAF-PRO-0016 Incident Notification and Investigation
- EQR-SAF-FOR-0003 Non-conformance Report
- EQR-SAF-FOR-0005 Incident/Injury Report Form
- EQR-SAF-FOR-0047 Statement
- EQR-SAF-REG-0005 Corrective Action Register

37 Continual improvement

Opportunities for improvements to the suitability, adequacy and effectiveness of the IMS to enhance performance may be identified through manager and personnel meetings, the incident reporting tools, the Mt Carbine Operations Monthly Report and during internal/external audits and management reviews.

For performance improvements related to site practices, corrective actions will be recorded on the *Corrective Action Register*. Where improvements require changes to processes or site activities, these may be included in the FIIX system as a work request, as determined by the relevant manager.

Management commitment to fulfilling the requirements of this IMS manual will enhance performance, promote a positive culture and demonstrate inclusiveness of the entire workforce.

38 EQ RESOURCES Integrated Management System Document Map

DNRME *"SafeGuard"* Elements		EQ RESOURCES IMS		ISO 9001:2015 Quality	ISO 14001:2015 Environment	ISO 45001:2017 Occupational Health & Safety
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		1	Document Control History and Status			
		2	Introduction			
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		3	Terms and Definitions			
1	General Requirements	4	EQ Resources (EQ RESOURCES)	4. Context of the organisation	4. Context of the organization	4. Context of the organization
		4.1	EQ RESOURCES Context	4.1 Understanding the organization and its context	4.1. Understanding the organization and its context	4.1 Understanding the organization and its context
		4.2	Interested Parties	4.2 Understanding the organisation and its context	4.2. Understanding the needs and expectations of interested parties	4.2 Understanding the needs and expectations of worker and other interested parties
		4.3	Scope of the EQ RESOURCES IMS	4.3 Determining the scope of the quality management system	4.3. Determining the scope of the environmental management system	4.3 Determining the scope of the OH&S management system
		4.3.1	Included Activities			
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		4.4	Integrated Management System	4.4 Quality management system and its processes	4.4. Environmental management system	4.4 OH&S management system
		5	Leadership	5. Leadership	5. Leadership	5. Leadership
		5.1	Leadership and Commitment	5.1 Leadership and commitment	5.1. Leadership and commitment	5.1. Leadership and commitment

DNRME *"SafeGuard"* Elements		EQ RESOURCES IMS		ISO 9001:2015 Quality	ISO 14001:2015 Environment	ISO 45001:2017 Occupational Health & Safety
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		5.1.1	Customers	5.1.2 Customer focus		
2	Safety & Health Policy	5.2	Integrated Management Policies	5.2 Policy	5.2 Environmental policy	5.2. OH&S policy
		5.2.1	Communicating the Policies	5.2.2 Communication the quality policy		
6	Resources, structure and responsibilies	5.3	Roles, Responsibilities and Authorities	5.3 Organisational roles, responsibilities and authorities	5.3. Organizational roles, responsibilities and authorities	5.3. Organizational roles, responsibilities and authorities
		5.4	Consultation and Participation of Workers			5.4 Consultation and participation of workers
3	Planning for hazard and risk reduction, assessment and control	6	Planning	6. Planning	6. Planning	6. Planning
		6.1	Risks and Opportunities	6.1 Actions to address risks and opportunities	6.1. Actions to address risks and opportunities	6.1. Actions to address risks and opportunities
		6.1.1	General		6.1.1 General	6.1.1 General
		6.1.2	Environment, Safety and Health - Aspects & Hazard Identification		6.1.2 Environmental aspects	6.1.2 Hazard identification and assessment of risks and opportunities
		6.1.3	Environment, Safety and Health - Assessment of Risk and Opportunities			
4	Legal and other requirements	6.1.4	Environment, Safety and Health - Legal and Compliance requirements		6.1.3 Compliance obligations	6.1.3 Determination of legal requirements and other requirements

DNRME *"SafeGuard"* Elements		**EQ RESOURCES IMS**		**ISO 9001:2015 Quality**	**ISO 14001:2015 Environment**	**ISO 45001:2017 Occupational Health & Safety**
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		6.1.5	IMS Planning Action		6.1.4 Planning action	6.1.4 Planning action
5	Objective, targets and management plans	6.2	IMS Objectives and Planning	6.2 Quality objectives and planning to achieve them	6.2. Environmental objectives and planning to achieve them	6.2. OH&S objectives and planning to achieve them
		6.2.1	IMS Objectives		6.2.1 Environmental objectives	6.2.1 OH&S objectives
		6.2.2	IMS Objectives Actions	6.3 Planning of changes	6.2.2 Planning action to achieve environmental objectives	6.2.2 Planning to achieve OH&S objectives
6	Resources, structure and responsibilies	7	Support	7. Support	7. Support	7. Support
		7.1	Resources	7.1 Resources	7.1. Resources	7.1. Resources
		7.1.1	General	7.1.1 General		
		7.1.2	People	7.1.2 People		
		7.1.3	Infrastructure	7.1.3 Infrastructure		
		7.1.4	Operational Environment	7.1.4 Environment for the operation of processes		
		7.1.5	Monitoring and Measuring Resources	7.1.5 Monitoring and measuring resources		
		7.1.6	Organisational Knowledge	7.1.6 Organisational knowledge		
7	Competence, training and awareness	7.2	Competence	7.2 Competence	7.2. Competence	7.2. Competence
		7.3	Awareness	7.3 Awareness	7.3. Awareness	7.3. Awareness
8		7.4	Communication	7.4 Communication	7.4 Communication	7.4 Communication

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	Communication, consultation and reporting	7.4.1	General		7.4.1 General	7.4.1 General
		7.4.2	Internal Communication		7.4.2 Internal communication	7.4.2 Internal communication
		7.4.3	External Communications		7.4.3 External communication	7.4.3 External communication
9	Safety and health documentation	7.5	EQ RESOURCES Document Control	7.5 Documented information	7.5 Documented information	7.5 Documented information
		7.5.1	General	7.5.1 General	7.5.1 General	7.5.1 General
		7.5.2	Creating and Updating	7.5.2 Creating and updating	7.5.2 Creating and updating	7.5.2 Creating and updating
10	Control of documents and data	7.5.3	Document Control	7.5.3 Control of documented information	7.5.3 Control of documented information	7.5.3 Control of documented information
15	Safety & Health Records	7.5.4	Control of Records			
		8	Operation	8 Operation	8. Operation	8. Operation
		8.1	Operational Planning and Control (Quality)	8.1 Operational planning and control		
		8.1.2	Products and Services	8.2 Requirements for products and services		
		8.1.3	Design and Development	8.3 Design and development of products and services		
		8.1.4	Externally Provided Processes, Products and Services	8.4 Control of externally provided processes, products and services		
		8.1.5	Production and Service	8.5 Production and service provision		

DNRME *"SafeGuard"* Elements		EQ RESOURCES IMS		ISO 9001:2015 Quality	ISO 14001:2015 Environment	ISO 45001:2017 Occupational Health & Safety
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		8.1.6	Release of Products and Services	8.6 Release of products and services		
		8.1.7	Nonconforming Outputs	8.7 Control of nonconforming outputs		
		8.2	Operational Planning and Control (Environment)		8.1 Operational planning and control	
		8.2.1	Environmental emergencies			
		8.2.2	Environmental incidents			
		8.3	Operational Planning and Control (Safety and Health)			8.1 Operational planning and control
11	Hazard and risk identification, assessment and control	8.3.1	Eliminating Hazards & Reducing Risks			8.1.2 Eliminating hazards and reducing OH&S risks
		8.3.2	Risk Management – Principles and Guidelines			
		8.3.3	Safety and Health Control of Work Procedures			
		8.3.4	Management of Change			8.1.3 Management of change
		8.3.5	Procurement			8.1.4 Procurement
		8.3.6	Contractor Management			
		8.3.7	Outsourcing			
12	Emergency preparedness and response	8.4	Emergency Planning, Preparedness and Response		8.2 Emergency preparedness	8.2 Emergency preparedness and response
13	Monitoring and measurement	9	Performance Evaluation	9. Performance evaluation	9. Performance evaluation	9. Performance evaluation

DNRME *"SafeGuard"* Elements		EQ RESOURCES IMS		ISO 9001:2015 Quality	ISO 14001:2015 Environment	ISO 45001:2017 Occupational Health & Safety
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		9.1	Monitoring, Measurement and Evaluation	9.1. Monitoring, measurement, analysis and evaluation	9.1. Monitoring, measurement, analysis and evaluation	9.1. Monitoring, measurement, analysis and evaluation
		9.1.1	General	9.1.1. General	9.1.1. General	9.1.1. General
		9.1.2	Operational Monitoring and Measurement			
		9.1.3	Environmental Monitoring			
		9.1.4	Safety and Health Monitoring			
		9.1.5	Customer satisfaction	9.1.2. Customer satisfaction		
		9.1.6	Analysis and Evaluation	9.1.3. Analysis and evaluation		
4	Legal and other requirements	9.1.7	Evaluating Compliance		9.1.2 Evaluation of compliance	9.1.2 Evaluation of compliance
16	Safety & Health Audits	9.2	Internal Audits	9.2. Internal audit	9.2 Internal audit	9.2 Internal audit
		9.2.1	General		9.2.1 General	9.2.1 General
		9.2.2	Internal Audit Programme		9.2.2 Internal audit programme	9.2.2 Internal audit programme
17	Management Review	9.3	Management Review	9.3. Management review	9.3 Management review	9.3 Management review
		9.3.1	Management Review Inputs	9.3.2. Management review inputs		
		9.3.2	Management Review Outputs	9.3.3. Management review outputs		
		10	Improvement	10. Improvement	10. Improvement	10. Improvement

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		10.1	General	10.1. General	10.1. General	10.1. General
14	Incident Investigation, Corrective action and preventive action	10.2	Incident, Nonconformity and Corrective Action	10.2. Nonconformity and corrective action	10.2. Nonconformity and corrective action	10.2. Incident, nonconformity and corrective action
		10.3	Continual improvement	10.3. Continual improvement	10.3. Continual improvement	10.3. Continual improvement

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