

Conundrum Holdings Pty Ltd Environmental Policy

Conundrum Holdings Pty Ltd conducts its business in a way that manages environmental risks and reduces the risk of harm to human health and the environment from pollution and waste through efficiently utilising resources, and continually improving risk controls. Managing our environmental impact is vital for the overall efficiency and success of the business.

Legislative Responsibilities

We recognise our responsibilities under the *Mineral Resources (Sustainable Development) Act 1990* and our General Environmental Duty (GED) under the *Environment Protection Act 2017*, (s25-27).

Who regulates Work Authorities?

Earth Resources Regulation (ERR) is the primary regulator for mining and quarrying, delivering regulatory functions under the MRSD Act. ERR will be contacted if a pollution incident occurs that causes or threatens harm to human health or the environment including ground water contamination as soon as practicable.

EPA is the primary regulator of water discharges from mining and quarrying industries. EPA is also responsible for advising on monitoring of air quality and noise emissions when responding to referrals from other government agencies. EPA will be contacted as soon as practicable if a pollution incident occurs on a site not covered by ERR that causes or threatens harm to human health or the environment including ground water contamination .

How can I help?

Conundrum Holdings Pty Ltd recognises active participation of every employee is vital to protecting our environment and, with the assistance of all members of the workforce, we will continually identify and eliminate or manage our environment, our impact on our environment and risks associated with our activities.

Conundrum Holdings Pty Ltd also recognises the importance of engaging with those communities who may be affected by our activities, and by sharing relevant information and providing reasonable opportunity for the community to express their views we will perform better.

What is Conundrum's policy?

It is Conundrum Holdings Pty Ltd policy to put in place reasonably practicable measures to eliminate or reduce identified risks of harm from pollution or waste by:

Site Management

- Minimise the site's footprint by:
 - Minimising the area disturbed by operations.
 - Retaining the site's indigenous flora and fauna are preserved where possible, and offsets sought in all other instances.
 - Implementing pest weed and animals control programs.
 - Efficiently collecting, storing, using and, where possible, recycling water.
- Eliminate or minimise off-site discharges or emissions (i.e. dust and noise emissions) by:
 - Suppression, collection, and treatment of emissions.
 - Manage and monitor any emissions not eliminated.
- Use and maintain systems for identifying, assessing and controlling environmental risks.
 - Use and maintain plant, equipment, processes and systems in a way that minimises risks (e.g., capital investment and use and maintenance in accordance with manufacturer's specifications).
 - Use and maintain adequate systems to ensure that harmful effects are minimised.
 - Handle, transport, store and use all substances in a way that minimises risks.

Date issued:	6 July 2021	Previous issue date:	4 May 2005	Date of first issue:	18 Mar 2002
Issue number:	3			Max review interval:	5 years
Authorised by:	Ron Kerr			Manual index location:	CPS
Date printed:	21 Oct 2021		Page 1 of 2		Form: 0854

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- Take reasonably practicable measures to restore the environment if a pollution incident occurs.
- Provide a suitable reporting system for all matters relating to the environment.
- Provide environmental information, instruction, supervision and training to employees.
- Comply with applicable laws and national and industry standards and, where standards do not exist, develop internal rules and standards necessary to protect the environment.

Approved Work Authorities

- Progressively rehabilitate operations to conform to the site rehabilitation plan.
- Conserve any topsoil removed from work areas for later re-use.
- Use explosives in a manner that minimises emissions including fly-rock, back break, ground vibration and air blast.

Concrete Plants

- Ensure every possible litre of water is captured and reused for concrete manufacturing.
 - Capture and reuse dirty water from paved surfaces.
 - Water contaminated with cementitious or admixture products must be within a closed circuit to limit the quantity produced during a precipitation (rain) event.

Imported Materials and Recyclable Materials

- Only suitable clean recyclable material composed of naturally occurring materials that are fit for purpose, of consistent quality and suitable for processing to a specification will be accepted.
- Never accept on any Conundrum Holdings Pty Ltd site:
 - Acid Sulfate Soil and Rock (EPA Publication No. 655.1).
 - Industrial waste, domestic waste, putrescent waste, prescribed industrial waste and prohibited waste (e.g., redundant equipment, rubbish, used tyres, batteries, asbestos, hydrocarbons and chemicals).

Waste Management

- As far as practicable avoid producing or generating waste and re-use or recycle where possible.
- Ensure wastes produced on site are minimised or separated and recycled or disposed of safely.
- Take all reasonably practicable steps to ensure priority waste is isolated and contained so it cannot escape into the environment.
 - Identify and classify types of waste, ensuring industrial and priority waste transporters and waste receivers can lawfully transport and receive that waste.
 - Give the person who collects or consigns priority waste relevant information necessary for them to comply with the law.
 - Record and notify transaction details relating to reportable priority waste in accordance with regulations.



Ron Kerr
Managing Director

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