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1. PURPOSE

The purpose of this Management Standard is to describe the management and control arrangements for the monitoring of performance, and management and reporting of data required for the effective operation and performance of the HZL Sustainability Governance System. This standard has been adopted from the parent company Vedanta's Sustainability framework.

2. SCOPE

This Management Standard is mandatory and applies to all HZL subsidiaries, operations and managed sites, including new acquisitions, corporate offices and research facilities and to all new and existing employees and contractor employees. This Standard is applicable to the entire operation lifecycle (including exploration and planning, evaluation, operation and closure).

3. **DEFINITIONS**

Definitions of key terms and concepts used in this document are shown in the following table.

Term	Definition
To document (verb)	Information and its supporting medium. The medium may be in various forms e.g. paper, magnetic, electronic.
GRI	Global Reporting Initiative – an organisation that develops and disseminates globally applicable "Sustainability Reporting Guidelines" for voluntary use by organisations reporting on the economic, social and environmental management criteria.
Key Performance Indicator	A specific parameter that provides information about HZL's operational and management performance.
Management Information System	An electronic management dashboard and platform for data collection.
Operation(s)	A location or activity that is operated by a HZL Company and its subsidiaries. Locations could include exploration activities, mines, smelters, refineries, wind farms, offices including corporate head offices and research and development facilities.
Procedure	Specified way to carry out an activity or a process.
Record	Document stating results achieved or providing evidence of activities performed. A record is not 'live' or "work in progress" document, but holds data and information of past events and therefore does not require updating.
Record management	The systematic process of identifying, creating, classifying, controlling, using, maintaining, reviewing and destroying records to ensure that evidence of, and information about business are established and maintained in an appropriate manner.



4. PROGRAMME DESIGN AND KEY REQUIREMENTS

All HZL subsidiary companies and operations are required to follow the requirements listed below with regards to monitoring of performance, data management and reporting.

4.1. Performance Monitoring

- a) The HZL Chief Sustainability Officer shall establish Sustainability Key Performance Indicators (KPI) and other performance measures.
- b) Corporate shall maintain a Management Information System to collate, monitor and respond to performance outcomes, intervening as required to ensure conformance with HZL Objectives and Targets and stakeholder expectations.
- c) KPIs and progress on meeting HZL Objectives and Targets shall be a standing agenda item for the Sustainability Committee (see *Leadership*, *Responsibilities and Resources* Management Standard MS01)
- d) Operations shall establish, implement and maintain procedures and other arrangements to monitor and measure on a regular basis those aspects of its operations and activities that are identified to have sustainability risks, impacts or opportunities and where performance data is required by HZL Corporate. HZL operations may have additional KPIs that are specific to their activities and impacts.
- e) Operations shall establish, implement and maintain the arrangements for documenting the information collected to demonstrate performance, adherence to controls and compliance with applicable legal and other requirements and corporate objectives and targets.
- f) Where the use of monitoring and measuring equipment is required, HZL operations shall ensure that procedures and arrangements are in place to ensure that such equipment is used and maintained appropriately and that documentation is kept regarding this use and maintenance, including particularly when certificates of conformity to local legal and other requirements are issued and when equipment is calibrated and certified as appropriate for further use.

4.2. Data Management

- a) HZL operations shall establish, implement and maintain procedures and other arrangements for:
 - Managing data as required by the Management Information System to include procedures that include data definitions, responsibilities, information system, records management and auditing, and as detailed in the Management Standard on Documentation and Records Management;
 - Reporting data as required within the Operation, to Corporate and to required external parties (e.g. regulators) for the purposes of Performance Monitoring, and
 - Reporting any other information as may be required for any other internal or external purposes.
- b) HZL operations shall review the types of data used and determine appropriate data retention times. The retention period for data records will depend on legislation, company requirements and whether the information is likely to be needed in the future. The record retention process shall include both a process for filing the data records so that their age is known and also a process for destruction of data records where they are no longer required.

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4.3. Reporting

- HZL operations shall establish, implement and maintain procedures and arrangements a) for the reporting of aspects of its sustainability governance system to:
 - Enable communication with HZL corporate in accordance with procedures and other arrangements;
 - Facilitate the Sustainability Committee in fulfilling its role and responsibilities for the regular meeting, discussing and addressing of aspects of sustainability governance as detailed in its ordinary meeting agenda and in accordance with the Leadership, Responsibilities and Resources Management Standard);
 - Report as required on the Operation's performance against the KPIs established
 - Enable and promote internal communication within the operation, seeking at all times to ensure transparency and sharing of information pertinent to the intended stakeholder(s);
 - Ensure that communication with external stakeholders is received, documented and responded to with external stakeholders and other interested parties as required in the Technical Standard on Stakeholder Engagement, and
 - Share with external stakeholders aspects of sustainability governance reporting as appropriate, including and in particular environmental monitoring data.
- b) HZL Corporate is responsible for producing HZL's annual Sustainability Report which shall conform to Global Reporting Initiative (GRI) standards.

5. **ROLES AND RESPONSIBILITIES**

HZL subsidiaries, businesses, operations and sites shall ensure that roles and responsibilities for implementing and complying with this Standard are allocated. Key responsibilities shall be included in iob descriptions, procedures and/or other appropriate documentation.

COMPLIANCE AND PERFORMANCE 6.

Each HZL operation shall ensure that it complies with the requirements of this Standard. Performance against the requirements of this Standard shall be assessed periodically, documented and, where required, reported to HZL. The assessment of performance shall include setting and reporting on key performance indicators (KPIs) where these have been established at HZL Company or operation level.

The evaluation of performance shall include, as a minimum, confirmation that:

- Sustainability Key Performance Indicators (KPI) and other performance measures have been established;
- Arrangements are in place for establishing, implementing and maintaining documentation on the information collected to demonstrate performance;
- Equipment for monitoring and measuring is maintained;
- Data is monitored and reported to HZL and/or external bodies as applicable:
- Data is retained through appropriate data registers and destroyed as appropriate.

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7. SUPPORTING INFORMATION

Reference	Description
ICMM (International Council of Mining and Metals)	The ICMM has produced and published good practice guidance on a range of health, safety, environment and community issues relating to mining. http://www.icmm.com/library
International Finance Corporation Performance Standards (PS) and PS Guidance Notes	The IFC has published Guidance Notes to guide the implementation of the full range of performance standards. These are available on the website. The guidance is currently being updated and draft versions (V2) are available however these have not yet been finalised and formally published.
	http://www.ifc.org/ifcext/sustainability.nsf/Content/PerformanceSt andards
ISO 19011:2002	Guidelines for quality and/or environmental management systems auditing
	http://www.iso.org
	G3 Guidelines
Global Reporting Initiative (GRI)	http://www.globalreporting.org/ReportingFramework/G3Guidelines/

8. REVIEW

This Management Standard shall be periodically audited and reviewed to determine its accuracy and relevance with regard to legislation, education, training and technological changes. In all other circumstances, it shall be reviewed no later than 24 months since the previous review.

9. REFERENCES

Doc. Ref.	Title
MS 01	Leadership, Responsibilities and Resources Management
MS 05	Objectives, Targets and Performance Improvement
MS 09	Documentation & Records Management
TS 02	Employee Consultation and Participation
TS 05	Stakeholder Engagement

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