



# GROUP SAFETY STANDARD 5 CRISIS AND EMERGENCY MANAGEMENT PREPAREDNESS

DATE: 19 JUNE 2020



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## 1. PURPOSE

This document defines IGO's framework for crisis and emergency management preparedness.

## 2. APPLICATION

This standard applies to all IGO managed entities, sites and projects (including corporate office, operational sites, project sites and exploration activities).

**Note:** It is expected that those in a senior leadership position within IGO (i.e. managers and above) have read and understood the requirements of this standard.

## 3. PART A: CRISIS MANAGEMENT PREPAREDNESS

IGO will ensure crisis management preparedness by means of:

- The annual review of this document  
The completion of housekeeping tasks listed in Appendix 17 (at a minimum annually) and the completion of associated corrective actions
- The completion of an annual crisis management exercise. The exercise shall be subject to third-party review. Refresher training shall be completed as required
- The maintenance of site-specific Emergency Management Plan(s) (EMPs) (see section 13). This requirement is applicable to both IGO sites and the IGO exploration team.
- The establishment, resourcing, and training of site-based emergency response teams to deal with local emergencies
- The establishment of a specific location at each IGO site from which a crisis or an emergency can be managed (e.g. a suitable meeting room). This room must contain suitable equipment, relevant materials, and communications devices to enable the effective management of an event
- The maintenance of an annual schedule of site-specific emergency training, drills and exercises. Training, drills, and exercises must be completed to schedule. Records of the completed training, drills and exercises, and the associated corrective actions must be kept in INX
- The establishment of an assurance process to ensure that the above occurs to plan

## 4. CRISIS RECOGNITION

To generalise, a crisis for our business is a situation, or series of events, that both:

- Pose a material threat to our business
- Over which we have no effective management control (if only initially)

At IGO, we have a pre-defined set of events that, should they occur, must be evaluated to determine whether or not a crisis situation exists. This set of events is presented in Table 1 (as taken from ***IGO Common Management System Standards 3 – Risk Management***).



	Health	Safety	Environment	Community & Reputation	Financial Loss or Exposure	Compliance
<b>5 - Catastrophic</b>	<ul style="list-style-type: none"> <li>Chronic exposure of numerous employees to elevated levels of Class A carcinogen or similarly hazardous material resulting in disease</li> <li>Widespread outbreak of infectious disease.</li> </ul>	<ul style="list-style-type: none"> <li>Fatality</li> <li>Permanently disabling injury</li> </ul>	<ul style="list-style-type: none"> <li>Widespread environmental damage.</li> <li>Extinction or credible risk of species extinction.</li> <li>Destruction or credible risk of destruction of listed ecosystem</li> </ul>	<ul style="list-style-type: none"> <li>Very serious widespread social impacts causing site closure</li> <li>Irreparable damage to highly valued structures/items/locations of cultural significance</li> <li>Government or police intervention in operations</li> <li>Operations/production stopped by community action</li> <li>Prolonged or national media focus on the Company's activities or impacts</li> <li>Community fatality as direct consequence of IGO's actions</li> </ul>	<ul style="list-style-type: none"> <li>loss of &gt;\$100M cash flow</li> <li>loss of &gt; 25% market capitalisation</li> </ul>	<ul style="list-style-type: none"> <li>Prosecution resulting in imprisonment of Company officer, or</li> <li>Suspension of operating licence of a mine</li> </ul>

**Table 1 – IGO Catastrophic Risk Consequences**

It should be noted that other events may give rise to a crisis; it is entirely possible that a crisis may arise in an unexpected way or as a slow set of events. It should also be noted that a crisis may involve just a single mine, the entire company, a subsidiary company or a joint venture company. A crisis may arise as a consequence of actual events or potential consequences. A crisis may be difficult to identify, and they can escalate very rapidly. They will almost always involve media interest at a state or national level.

The immediate responsibility for determining whether an event may constitute a crisis, and therefore require notification of the Chief Executive Officer (CEO) lays with the site Registered Manager<sup>1</sup> or functional manager. However, the following events always constitute a crisis:

- A work place fatality
- Any underground entrapment events
- Any accident resulting in 3 or more seriously injured persons

If the Registered Manager or Function Manager declares a situation to be a crisis because of the occurrence of one of the above listed events, they must immediately contact the Chief Executive Officer (CEO), or their designated alternative.

**To reiterate: the immediate responsibility for determining whether an event may constitute a crisis lays with the site Registered Manager or Function Manager.**

## 5. DECLARATION OF A CRISIS

Excluding those events predetermined to constitute a crisis as listed in section 4, responsibility for determining if crisis exists rests with:

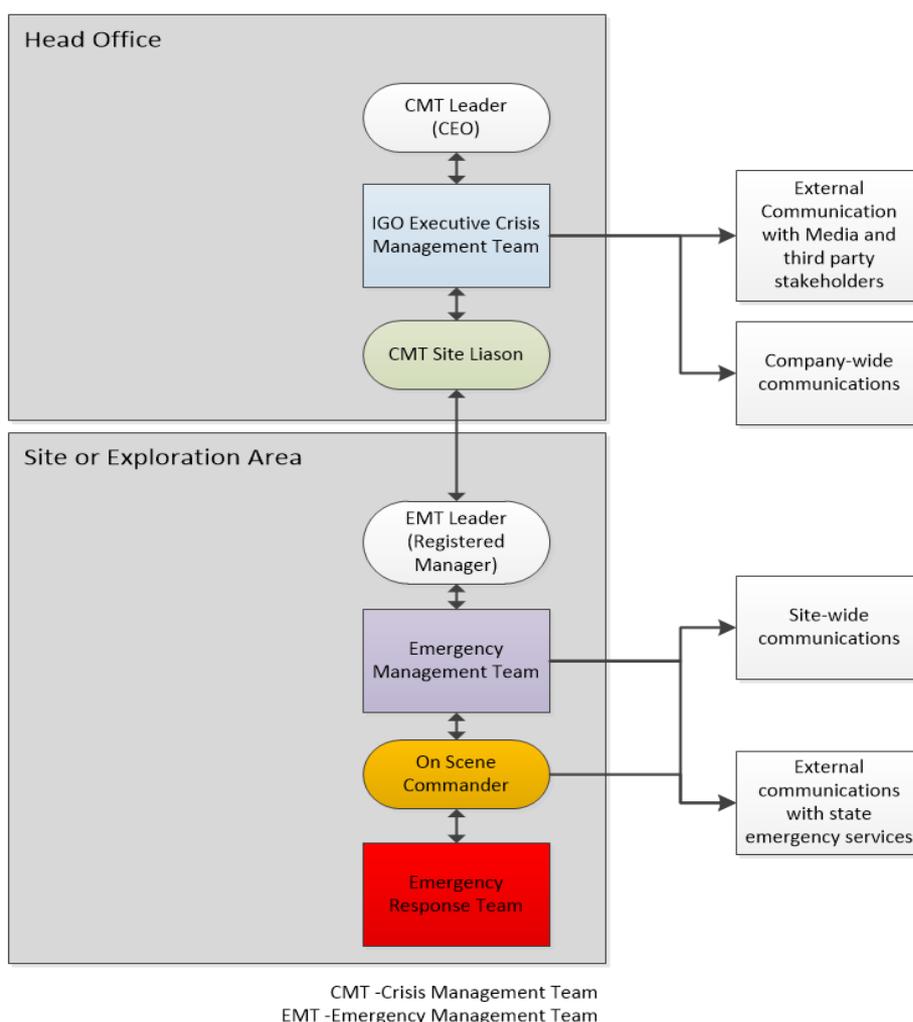
- The Chief Executive Officer (CEO)
- Or in their absence, the Chief Operating Officer (COO)
- Or in their absence, the Chief Financial Officer (CFO)
- Or in their absence, the General Manager, Exploration
- Or in their absence, the Head of HSEQ & Risk

<sup>1</sup> The Exploration Manager is both the Department Manager and Registered Manager for the Exploration Department in circumstances where a specified Registered Manager is not appointed to an exploration project.

If the CEO or their designated alternative declares a crisis, or they believe that there is the potential for a crisis to arise, they must call for the assembly of the IGO Crisis Management Team (see section 6).

## 6. LEADERSHIP HIERARCHY DURING A CRISIS

In overview, whilst the on-site emergency response and management teams will be focused on saving life, property and minimising harm to the environment, the crisis management team must focus on supporting the site in crisis, managing business continuity, liability and IGO's reputation. The leadership hierarchy to be applied during a crisis that involves a site or operation is presented in Figure 1.



**Figure 1 - Leadership Hierarchy of Control During Crisis**

**Note: CMT members must resist the urge to become directly involved in the Emergency Management Team (EMT) if the crisis stems from an emergency.**

## 7. THE CRISIS MANAGEMENT TEAM

Once a crisis is declared, or the CEO believes that there is the potential for a crisis to arise, the CEO will call for the Crisis Management Team (CMT) to convene. Typically, the Crisis Management Team shall be comprised of all available Executive Leadership Team (ELT) members, or in their absence, their nominees or someone else as circumstances may require.

Typically, the CMT Team Leader will be the CEO or their designated alternative. On arrival at the CMT room, CMT members will be assigned roles specific to the crisis management standard by the CMT Team



Leader. (It is expected that CMT members will be assigned roles that generally align to their normal daily roles or skill sets).

The predefined and default roles to be assigned within the CMT team are:

- CMT Team Leader (CEO or designated alternative, see Appendix 2)
- Operations Leader (COO or designated alternative, see Appendix 3)
- CMT Team Facilitator (Head of HSEQ & Risk, see Appendix 4)
- Internal Communications and Workforce Welfare Officer (Head of People & Culture, see Appendix 5)
- Media Liaison and External Communications Officer (Communications Manager, see Appendix 7)
- Board, Market & Shareholder Communications Officer (Company Secretary, see Appendix 6)
- Legal and Insurance (General Counsel, see Appendix 8)
- Business Continuity Planning (Head of Corporate Development, see Appendix 9)
- IT Disaster Recovery Team (IT Manager) (*to be assigned as required*, see Appendix 10)
- Log keeper (Administration Officer, see Appendix 11)
- Reception & Phone Coordinator (**Note: this must be allocated to a manager or senior member of staff, see Appendix 12).**

*In the absence of a member of the ELT to perform a role on the CMT, their natural alternate should be assigned to the role. Given the crisis at hand, it may also be appropriate to include discipline specialists on the team. CMT role has a Duty Card with cross referenced Appendices. The Duty Cards are intended as a prompt to ensure that key steps are completed, and key questions are considered. It is the responsibility of the assigned CMT member to complete the tasks defined on their Duty Card.*

## 8. ACTIVATION AND ASSEMBLING THE CRISIS MANAGEMENT TEAM

CMT members will be notified of the crisis by the CMT Leader or their delegate. This will occur by phone call and or via Microsoft Teams. As required, the Crisis Management Team (CMT) must assemble in the IGO South Perth Office Board Room (unless otherwise directed by the CMT Team Leader). If you are first in the room, complete the 'first person in the room' tasks – see Appendix 1)

The IGO Boardroom is the designated CMT room and all necessary resources are stored and maintained with a designed, clearly marked store area.

## 9. CRISIS MANAGEMENT: A PROCESS

The role of the CMT is to re-establish control (in so far as is possible and appropriate). To this end, we expect our managers to do what they'd normally do; demonstrate leadership and manage. Importantly, the crisis management process does not change these requirements. Rather, the crisis management process is intended to impose discipline on the CMT around:

- adherence to a crisis management cycle (see section 10)
- the completion of a minimum set of tasks (see section 11 & Appendix 1 - Appendix 13).

## 10. STEPS IN THE CRISIS MANAGEMENT CYCLE

The crisis management cycle for the CMT is a series of discrete team-meetings followed by break-out periods. This enables a balance between information sharing and crisis coordination by the available members of the executive team. This cycle is illustrated in Figure 2.

- CMT meetings must be held to:
  1. establish the facts
  2. identify key issues and stakeholders
  3. define the desired strategic outcomes
  4. identify the key elements of the recovery plan and prioritise them.

Guidance on the meeting structure is provided in Appendix 4
- The duration of CMT sessions must be limited to enable the individual team members to acquire further information, complete communications, and follow-up on actions (e.g. meetings should be limited to 30-40 minutes).  
See Appendix 1 - Appendix 13
- Thereafter, the CMT meets again to update & assess any newly established facts, issues and stakeholders, and revise the desired strategic outcomes and recovery activities as necessary. The cycle is then repeated.

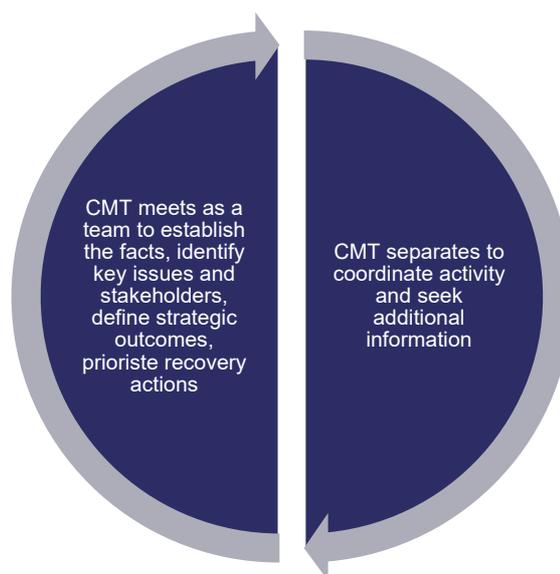


Figure 2 – Crisis Management Cycle

## 11. SPECIFIC MATTERS FOR CONSIDERATION BY THE CMT

Appendix 1 - Appendix 13 contains the Duty Cards for each defined role of the CMT. Notwithstanding these individual tasks, all members of the CMT should be mindful of the following matters as outlined in sections 11.1 - 11.5.1.

### 11.1 External Communication

In accord with the **IGO Group Governance Standard 6 - Continuous Disclosure and Information**, and in the event of a crisis, media statements shall only be made by the following people or their formal delegates:

- Managing Director
- Company Secretary
- Communications Manager
- Chairman of IGO.

If a media statement is required prior to establishing the facts of the situation and establishing a response strategy, the pre-approved pro-forma initial media statement presented in Appendix 14: INITIAL MEDIA STATEMENT must be used.



Note: Prior to the release of a media statement, and subject to the circumstances of the crisis, consideration must be given to contacting the ASX or as necessary releasing an ASX announcement. This should be coordinated in consultation with IGOs Company Secretary.

## 11.2 External Media Engagement

The overall objective of any external media release is to reassure stakeholders that IGO cares, is in-control and is committed to doing the right thing. In so far as is practical, it is imperative that the media gets immediate, accurate and pertinent information. It is equally important that the media is provided with regular updates and external stakeholders are given regular briefings related to the crisis. It should be assumed that the media will request the following:

- access to the CEO
- the cause of the crisis
- the individual or organisation responsible for the crisis
- the number of victims or fatalities (if any)
- the details of any property damage
- any ongoing hazards or danger
- IGOs plan of action.

## 11.3 Media Monitoring

The Communications Manager shall make such arrangements as required to ensure that:

- IGO can complete effective media monitoring (by meanings of some standing arrangement) and that such analysis is available to the CMT
- IGO has a standing relationship with a public relations business such that their services can be called upon at short notice.

## 11.4 Information Management

In the absence of guidance to the contrary, all documents related to a crisis event must be stored in S Drive's Crisis Management file (S:\000-Crisis Management) or designated crisis management team in Microsoft Teams.

Note: As per the Duty Cards (Appendix 1 - Appendix 13), each CMT member must prepare a 'personal log'. The log should record key decisions and conversations.

Note: In the event of a crisis, IGO may elect to protect some or all of the information about the incident under legal privilege. The CMT Leader and or Registered Managers should discuss this matter with IGO Legal Counsel.

### 11.4.1 Data Security Breaches

In the event of breaches to IGO's data security refer to the protocols for responding to data security breaches in the **IGO Group Governance Standard 3** and Appendix 19.

## 11.5 Next of Kin

In the event that the crisis involves fatalities, missing individuals or seriously injured people, the following protocols from sections 11.5.1 or 11.5.2 apply.



### 11.5.1 Australian Jurisdictions - Fatality

In accordance with DMIRS guidance, after the death of a person in a workplace accident in Australia, the relevant state police will notify the family of the event. Following this formal notification, the CEO or their designated alternative will contact the bereaved family.

IGO will arrange suitable support for the family and shall stay actively engaged with the family. IGO will act with compassion whilst being guided by legal counsel.

From this point, various government agencies or officers are required under the law to enquire into or investigate the death. Usually, investigations will be carried out by:

- the Coroner, with the assistance of police officers from the Coronial Investigation Unit, who will hold an inquiry and, in some instances, also hold an inquest.
- mines inspectors from the Department of Mines, Industry Regulation and Safety.
- the WA Police to find out whether someone has committed a criminal act.
- Comcare, where employment is by a company that is self-insured under a Commonwealth scheme.

### 11.5.2 Australian Jurisdiction – Significant Health and Safety Incident

In the event of any Serious Injury or Permanently Disabling Injury, or in circumstances where individuals are missing or trapped, the CEO or their designated alternative will contact the family. Again, IGO will arrange suitable support for the family and shall stay actively engaged with the family. IGO will act with compassion whilst being guided by legal counsel.

For further information, refer to the DMISR guideline entitled “Information for bereaved families following a mining fatality” found at:

[www.dmp.wa.gov.au/Documents/Safety/MSH\\_B\\_BereavedFamilies.pdf](http://www.dmp.wa.gov.au/Documents/Safety/MSH_B_BereavedFamilies.pdf)

## 12. END OF THE CRISIS

The process should be continued until normal line management can be effectively re-established and formal handover occurs from the CMT. At this point, the CMT Team Leader should declare the crisis over and dismiss the CMT Team. Time should be set for a formal CMT debriefing; the purpose is to review the performance of the crisis and emergency management process.

**Note: Debriefing should be kept separate from the incident investigation.**

## 13. PART B: EMERGENCY PREPAREDNESS

IGO requires that each mine site, related facilities and exploration project prepare an Emergency Management Plan (or plans) for dealing with emergencies. At mine sites, this specifically includes the deployment and use of mines rescue teams and firefighting resources.

### 13.1 Emergency Management Plan

Each mine site, related facilities and major exploration project shall have a documented Emergency Management Plan that addresses the following matters.

#### 13.1.1 Overview

The following basic information should be included in each site’s emergency response plan:



- Details of operation
- Details of the operating company and responsible persons
- The type of operation
- Assignment of emergency response duties
- The number of workers, and range of training and competencies
- Reference to the location of hazardous material manifests and location information
- Geography of the surrounding area, degree of remoteness, and available equipment

### 13.1.2 Operational Risk Review

The Emergency Management Plan must reference the site's Operation Risk Register (refer **to IGO GSS 3 – Safety Risk Management** and **IGO CMSS 3 - Risk Management**).

Based on this risk assessment, each site's Emergency Management Plan must list the credible emergency scenarios for which emergency response planning is required.

Specifically, the Emergency Management Plan shall document those matters related to a) Credible Emergency Scenario Planning (see section 13.1.3) and b) General Emergency Planning (see section 13.1.5).

### 13.1.3 Credible Emergency Scenario Planning

The Emergency Management Plan must identify the most likely emergency response scenarios and develop a scenario specific response plans for each. Examples of scenario specific plans include:

- Underground Evacuation Plan
- Aerodrome Emergency Plan (where the facility is site managed)
- TARPs (see section 13.1.4)

**Note: All operation mine sites, and construction projects must have Fire Prevention and Emergency Response Plan. This is a minimum mandatory requirement. Refer to IGO GSS 11 – Fire Prevention & Management.**

To assist with the development of emergency response plans, relevant sections of IGOs workforce (including both contractors and employees) must be involved in both risk reviews and the identification of the identification of credible emergency scenarios.

### 13.1.4 Use of 'Trigger Action Response Plans' (TARPs)

Trigger action response plans (TARPs) are a useful tool in circumstances where an emergency may arise from the culmination of gradually changing circumstances.

TARPs are used to demonstrate the relationship between conditions in a normal environment, an abnormal environment (e.g. equipment malfunctioning or overheating), and an emergency situation. A TARP defines the minimum set of actions required by workers in response to a deviation from normal working conditions.

TARPs are typically based on automated monitoring of a work environment or item of the plan (e.g. radar monitoring of ground movement, seismic monitoring, machine condition monitoring, inclement weather, bush fire tracking systems, etc.).



### **13.1.5 General Emergency Planning**

The Emergency Management Plan must identify those activities and processes required to respond to common elements of emergency management. For example:

- Injured person treatment and evacuation
- Confined space rescue
- Fall from heights rescue
- Hazardous material spill
- Vehicle accident
- Storm and lightning response

### **13.1.6 Emergency Response and Mines Recue Team**

Each mine must have suitable emergency response and mine's rescue team capability. The structure and basic man-power and physical resource requirements must be specified in the Emergency Response Plan.

The plan must define the site rules around mine's rescue team volunteers. Specifically, it must define a) the minimum number of mine's rescue team volunteers required on site at any given time, and b) the time allocated to volunteers to complete training. This latter point must be generally communicated to the workforce such that front line management hears the requirement stated by senior site management, and the workforce understands our commitment to release volunteers for training as required.

### **13.1.7 External Emergency Response Agency Engagement**

External emergency services may need to be consulted or engaged in matters relating to emergency preparedness and communication. This will include both standing engagement agreements or simple consultation protocols with organisations such as:

- Royal Flying Doctor service in Australia
- Local and regional hospitals
- Police, fire, and emergency services
- Industry safety regulators
- Local shires
- Occupants of neighbouring land

Arrangements with external emergency response agencies must be documented in the site's emergency response plan. Where mutual aid agreements have been established with nearby mines or other operators, the details must be documented in the plan.

## **14. EMERGENCY MANAGEMENT PLANS FOR EXPLORATION PROJECTS**

Any exploration project that requires the establishment of a camp that will persist for more than a month shall develop a site-specific Emergency Management Plan as outlined in section 13.1. For small or temporary camps, a generic Emergency Management Plan must be developed based on principles outlined above in so far as is relevant and practical.



## 15. TRAINING AND COMPETENCE

Sites shall take reasonable steps to ensure the workforce is familiar with the site's or project's Emergency Response Plan. Site management must be familiar with the site's Emergency Management Plan and this standard for IGOs crisis management.

All Emergency Services Officers (ESOs) and Mine's Rescue Team volunteers must be physically able to complete the tasks. Physical Capacity requirements shall be a condition of employment in the case of ESOs and acceptance as a volunteer in the case of mines rescue.

The Emergency Management Plan must define the training requirements for ESOs and Mine's Rescue Team volunteers. All training provided to ESOs and Mine's Rescue Team volunteers must be competency assessed. Training requirements completed training and competency assessment results must be captured in INX.

## 16. EMERGENCY MANAGEMENT PLAN REVIEW

Sites and projects must review their Emergency Management Plan at least every 2 years or more frequently where there has been a change in process or activity on site.

## 17. EMERGENCY MANAGEMENT PLAN APPROVAL

The Registered Manager is responsible for approving the site's Emergency Management Plan. A record of this approval must be documented.

## 18. RECORDS

Each project and site must capture a copy of their approved Emergency Management Plan in the IGO DMS.

Training records shall be kept as per **IGO CMSS 6 - Training, Competence and Awareness**.

## 19. RELATED DOCUMENTS

### 19.1 Common Management System Standards

- IGO CMSS 03 - Risk Management
- IGO CMSS 06 - Training, Competence and Awareness

### 19.2 Group Safety Standards

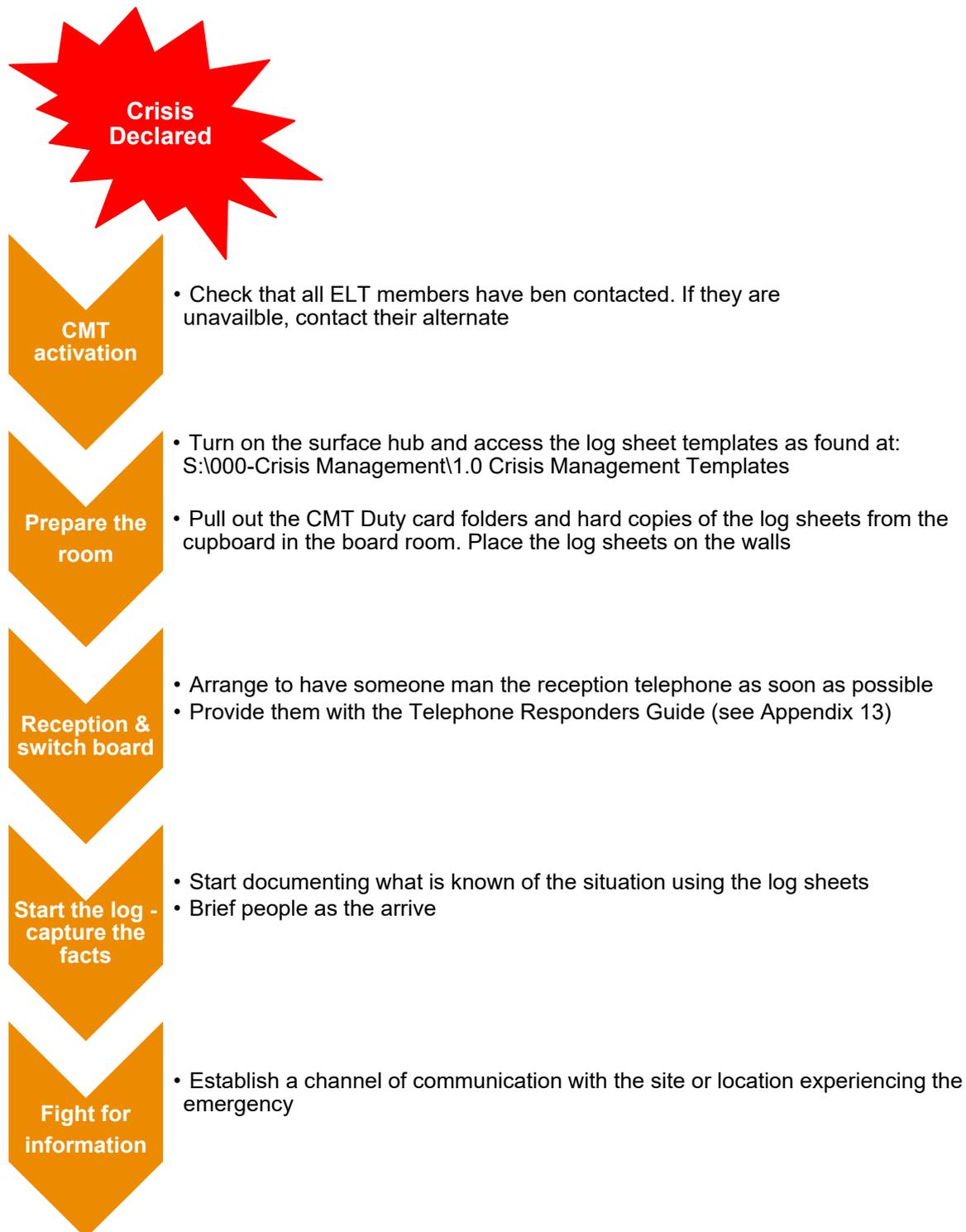
- IGO GSS 03 – Safety Risk Management
- IGO GSS 11 – Fire Prevention and Management

### 19.3 External Documents

- Code of Practice – Emergency response - SafeWork Australia
- Emergency Management Plan (EMP) Evaluation Checklist - DMIRS

## APPENDIX 1: CMT DUTY CARD - FIRST PERSON IN THE ROOM

If you are the first person in the CMT room, then please complete the following tasks:





## APPENDIX 2: CMT MEMBER DUTY CARDS - CMT LEADER

The CMT Leader is both accountable and responsible for the development and implementation of a response and recovery strategy, which will minimise the effect of any crisis or emergency on IGOs operability, reputation, profitability and liability.

Task	Status
<b>Initial Actions</b>	
Start and maintain a personal log (use log book provided).	
Obtain full details of emergency/incident/event from the affected EMT Leader (RM). Verify that there is a clear line of responsibility for emergency management coordination.	
Evaluate the need for full or partial activation of the CMT and arrange call-out as appropriate. Formally declare 'crisis' or otherwise.	
Brief those assembled to form the CMT.	
Assign roles. Determine each team member's responsibilities and ensure that they understand their role. (i.e. Duty Cards).	
Review the CMT cycle process with CMT (see over page). Define a schedule for EMT meetings. Review the key elements of the meeting process (see the following page).	
Ensure key stakeholders, JV partners, and the Board are briefed.	
Establish a briefing schedule and agreed meeting times of CMT.	
Review emergency response activities and casualty status.	
Obtain updates on the Recovery Plan.	
Determine the media strategy with CMT.	
Monitor contact with external stakeholders such as local authorities, regulatory bodies and government.	
Review media monitoring arrangements with Media Liaison and External Communications Officer (Communications Manager)	
Review and authorise the release of Media Releases and other Releasable Information.	
Ensure that all key actions are logged by the Log Keeper.	
<b>Immediately Post Crisis</b>	
Review incident investigation.	

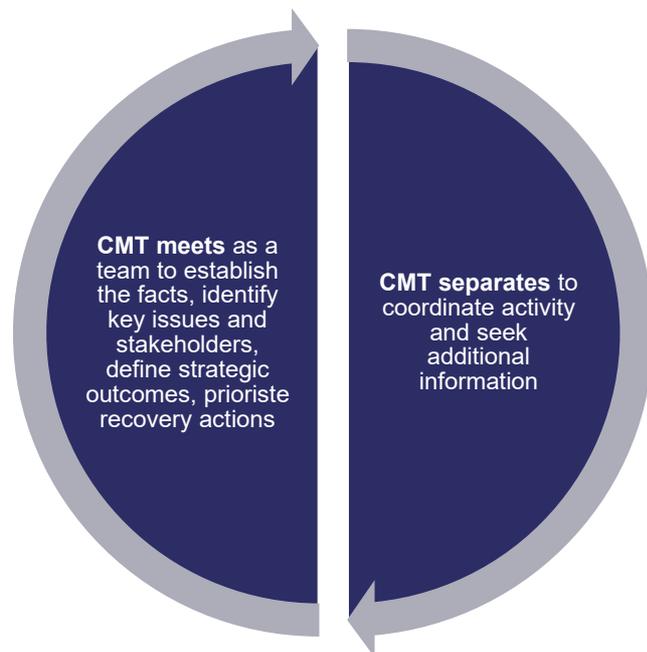
### Steps in the Crisis Management Cycle

The Crisis Management Cycle for the CMT is a series of discrete team-meetings followed by break-out periods. This enables a balance between information sharing and crisis coordination.

- CMT meetings must be held to:
  1. establish the facts
  2. identify key issues and stakeholders
  3. define the desired strategic outcomes
  4. identify the key elements of the recovery plan and prioritise them.

Guidance on the meeting structure is provided in this Duty Card.

- The duration of CMT sessions must be limited to enable the individual team members to acquire further information, complete communications, and follow-up on actions (e.g. meetings should be limited to 30-40 minutes).
- Thereafter, the CMT meets again to update & assess any newly established facts, issues and stakeholders, and revise the desired strategic outcomes and recovery activities as necessary. The cycle is then repeated.



**Note:** CMT members must resist the urge to become directly involved in the EMT if the crisis stems from an emergency.



**Meetings of the Crisis Management Team must:**

**STEP 1 – Establishing the Facts:**

Establish what facts are known and what facts need to be found or verified under the following headings:

People	Environment	Assets	Business Continuity	Reputation	Liability
--------	-------------	--------	---------------------	------------	-----------

**STEP 2 – Identifying the issues and stakeholders:**

Identify and list stakeholders allocating priorities and establish responsibility for contact.

Business Continuity	Reputation	Liability
<ul style="list-style-type: none"> <li>• The extent of involvement and what assets or ventures are affected?</li> <li>• Financial impact?</li> <li>• Business threat or direct interruption of business?</li> <li>• How is the incident or issue developing?</li> <li>• Associated constraints on other assets or ventures?</li> </ul>	<ul style="list-style-type: none"> <li>• Who are our key stakeholders?</li> <li>• Positive or negative perceptions?</li> <li>• Did media lead rumour or speculation?</li> <li>• The current level of enquiry, or interest by local, national and international media?</li> <li>• License to operate threatened?</li> </ul>	<ul style="list-style-type: none"> <li>• The extent of liabilities, claims or penalties?</li> <li>• Criminal liability?</li> <li>• Major third-party liability? Significant penalty or fine?</li> <li>• Financial impact and compensation?</li> <li>• Insurers?</li> </ul>

**STEP 3 – Define the desired strategic crisis management outcomes**

**The CMT must define the desired strategic outcomes.** During the crisis, these may change. Clearly stating the desired strategic outcomes will assist with clarity of communication and prioritisation of action.

Among these actions, it is critical that the CMT attend to the welfare of the wider workforce and communicate the facts of the situation as they become known.

**STEP 4 - Identify the key elements of the recovery plan and prioritise them:**

Business Continuity	Reputation	Liability
<ul style="list-style-type: none"> <li>• Resumption of operations?</li> <li>• Impact on customers?</li> <li>• Impact on suppliers?</li> <li>• Own equipment and property?</li> <li>• Local, national and international regulatory impacts?</li> <li>• Is the overall effect likely on the industry?</li> </ul>	<ul style="list-style-type: none"> <li>• Current and likely perception of the incident?</li> <li>• Government involvement?</li> <li>• Likely effects on reputation?</li> <li>• Likely impacts on or response from pressure groups and agencies?</li> <li>• Other industry companies?</li> </ul>	<ul style="list-style-type: none"> <li>• Clarify legal relationships and responsibilities for remedial actions?</li> <li>• Review the composition of investigations and use of an independent third party?</li> <li>• Publicise public guidelines for compensation as early as possible, especially on how to claim compensation without prejudicing ultimate liability?</li> <li>• Insurance?</li> <li>• Loss of revenue?</li> <li>• Legal issues?</li> </ul>



## APPENDIX 3: CMT DUTY CARD - OPERATIONS LEADER

Responsible for the coordination of operational support to the site. To provide advice as to the functional expert on the immediate and future impact and implications of the crisis, emergency or situation on the mine site and/or project.

Note: Resist the tactical urge to become directly involved in the EMT, if the crisis stems from an emergency.

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader (or ensure CMT Leader has been briefed).	
Start and maintain a personal log (use log book provided).	
Establish yourself as the main point of contact for the EMT Leader at the site.	
Ensure that an open line of communication is available at all times between CMT and site.	
Establish what external assistance is required by the site (how can the corporate team help?).	
Establish a schedule with the Site Emergency Team Leader (RM) to obtain updates.	
Provide guidance to the EMT Leader on decisions and actions undertaken by the CMT.	
Provide the CMT Leader and Corporate Affairs with the necessary information required to formulate appropriate responses to media questions.	
Ensure that all key actions are logged by the Log Keeper.	
<b>Immediately Post Crisis</b>	
Review incident investigation findings, track corrective actions to completion, communicate lessons from the incident.	
Review emergency management effectiveness.	



## APPENDIX 4: CMT DUTY CARD - TEAM FACILITATOR

The role of the CMT Team Facilitator is to ensure the CMT process is adequate supported

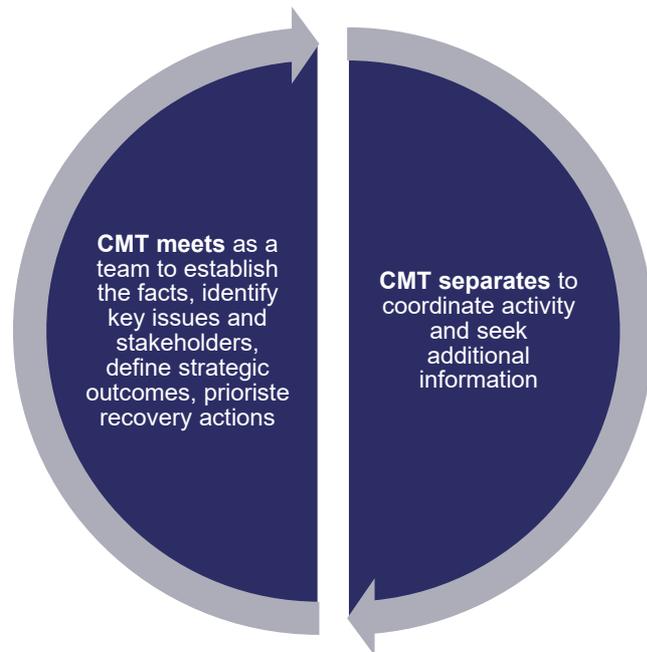
Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader.	
Start and maintain a personal log (use log book provided).	
Ensure Duty Cards are physically handed to each member of the CMT.	
Ensure the Log Keeper understands their role and responsibilities. Identify additional support resources as required.	
Ensure the Reception & Phone Coordinator understands their role and responsibilities. Identify additional support resources as required.	
Ensure crisis management process (see over page) is followed and discuss the application of process with CMT Team Leader.	
Verify that that the incident scene (if applicable) is secured post emergency response.	
Ensure corporate office building manager is advised of potential media activity associated with the crisis.	
Establish Corporate Incident Investigation team in accord with <b>IGO Group Safety Procedure- Incident Reporting &amp; Management</b>	
Collect and collate copies of all log sheets and written correspondence from all CMT Members and ensure its integrity and safe storage (as this will form critical evidence in judicial inquiries).	
Ensure that all key actions are logged by the Log Keeper.	
Assist the EMT Leader to prepare a debriefing session and stand down the CMT.	
Stand down all support staff.	
<b>Immediately Post Crisis</b>	
Ensure investigation is completed	
Review crisis management effectiveness.	

## Steps in the Crisis Management Cycle

The Crisis Management Cycle for the CMT is a series of discrete team-meetings followed by break-out periods. This enables a balance between information sharing and crisis coordination.

- CMT meetings must be held to:
  1. establish the facts
  2. identify key issues and stakeholders
  3. define the desired strategic outcomes
  4. identify the key elements of the recovery plan and prioritise them.

Guidance on the meeting structure is provided in this Duty Card.
- The duration of CMT sessions must be limited to enable the individual team members to acquire further information, complete communications, and follow-up on actions (e.g. meetings should be limited to 30-40 minutes).
- Thereafter, the CMT meets again to update & assess any newly established facts, issues and stakeholders, and revise the desired strategic outcomes and recovery activities as necessary. The cycle is then repeated.



**Note:** CMT members must resist the urge to become directly involved in the EMT if the crisis stems from an emergency.



**Meetings of the Crisis Management Team must:**

**STEP 1 – Establishing the Facts:**

Establish what facts are known and what facts need to be found or verified under the following headings:

People	Environment	Assets	Business Continuity	Reputation	Liability
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**STEP 2 – Identifying the issues and stakeholders:**

Identify and list stakeholders allocating priorities and establish responsibility for contact.

Business Continuity	Reputation	Liability
<ul style="list-style-type: none"> <li>• The extent of involvement and what assets or ventures are affected?</li> <li>• Financial impact?</li> <li>• Business threat or direct interruption of business?</li> <li>• How is the incident or issue developing?</li> <li>• Associated constraints on other assets or ventures?</li> </ul>	<ul style="list-style-type: none"> <li>• Who are our key stakeholders?</li> <li>• Positive or negative perceptions?</li> <li>• Did media lead rumour or speculation?</li> <li>• The current level of enquiry, or interest by local, national and international media?</li> <li>• License to operate threatened?</li> </ul>	<ul style="list-style-type: none"> <li>• The extent of liabilities, claims or penalties?</li> <li>• Criminal liability?</li> <li>• Major third-party liability?</li> <li>• Significant penalty or fine?</li> <li>• Financial impact and compensation?</li> <li>• Insurers?</li> </ul>

**STEP 3 – Define the desired strategic crisis management outcomes**

**The CMT must define the desired strategic outcomes.** During the crisis, these may change. Clearly stating the desired strategic outcomes will assist with clarity of communication and prioritisation of action.

Among these actions, it is critical that the CMT attend to the welfare of the wider workforce and communicate the facts of the situation as they become known.

**STEP 4 - Identify the key elements of the recovery plan and prioritise them:**

Business Continuity	Reputation	Liability
<ul style="list-style-type: none"> <li>• Resumption of operations?</li> <li>• Impact on customers?</li> <li>• Impact on suppliers?</li> <li>• Own equipment and property?</li> <li>• Local, national and international regulatory impacts?</li> <li>• Is the overall effect likely on the industry?</li> </ul>	<ul style="list-style-type: none"> <li>• Current and likely perception of the incident?</li> <li>• Government involvement?</li> <li>• Likely effects on reputation?</li> <li>• Likely impacts on or response from pressure groups and agencies?</li> <li>• Other industry companies?</li> </ul>	<ul style="list-style-type: none"> <li>• Clarify legal relationships and responsibilities for remedial actions?</li> <li>• Review the composition of investigations and use of an independent third party?</li> <li>• Publicise public guidelines for compensation as early as possible, especially on how to claim compensation without prejudicing ultimate liability?</li> <li>• Insurance?</li> <li>• Loss of revenue?</li> <li>• Legal issues?</li> </ul>



## APPENDIX 5: INTERNAL COMMUNICATIONS AND WORKFORCE WELFARE OFFICER

The role has two key purposes 1) internal communications and 2) workforce welfare.

It is important to ensure that all employees and contractors are kept informed of the situation.

**Note:** Internal communication from the CMT to those IGO sites unaffected by the crisis must be distributed via a written statement through their Registered Managers. It will be the responsibility of the site to communicate the message to all persons under their control. Only the facts should be stated and if there are any questions, those questions should be relayed to the CMT to ensure an accurate and consistent message is given across all internal and external stakeholders. Communication on the site affected by the crisis is the responsibility of the Registered Manager.

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader	
Start and maintain a personal log (use log book provided)	
Advise CMT Leader on requirements for HR support and NEC/NOK notification procedures	
Establish admin support as required	
Establish details of casualties e.g. next of kin, etc.	
Make arrangements to mobilise EAP as required	
For transport emergencies, obtain an accurate passenger list	
Develop HR response strategy	
In the event that an authorised IGO representative must speak with the next of kin at a venue other than their home (for example in circumstances where there are many people involved), the venue for meeting the next of kin meeting shall be arranged by the Internal Communications and Workforce Welfare Officer (HR Manager).	
<b>Note (1)</b> The venue for the meeting with Next of Kin shall be selected to avoid having Next of Kin and media in the same location and time. Note: Media will be taken to the Jaguar meeting room.	
Ensure that records of all press and staff briefings are given to the Log Keeper	
Ensure that all key actions are logged by the Log Keeper	
Stand down all support staff	
<b>Immediately Post Crisis</b>	
Follow-up with injured parties and or Next of Kin	



## APPENDIX 6: BOARD, MARKET & SHAREHOLDER COMMUNICATIONS OFFICER

Responsible for providing advice about the impact of the crisis on the public, with emphasis on communications with the Board, the ASX & Shareholders, and ensure that all external relations are conducted in a manner that upholds IGOs reputation/image.

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader	
Start and maintain a personal log (use log book provided)	
Take decision on the need to advise the ASX in consultation with the CMT Leader	
Ensure ASX statements are reviewed by the CMT Leader and Legal Counsel	
Consult with Media Liaison and External Communications Officer and ensure there is an agreed communications strategy	
Determine the market & shareholder response strategy as part of the Single Overriding Communications Objective (SOCO) with the CMT Leader and Media Liaison and External Communications Officer	
Work with the Media Liaison and External Communications Officer to arrange press interviews and conferences and support any senior company representative going forward to the affected location.  <b>Note (2) In the event that an authorised IGO representative must speak with the media, the media meeting area shall be the Jaguar meeting room.</b>	
Maintain an overview of the ASX and shareholder relations actions are taken, monitor their effectiveness and adjust approach as required. (Ensure that external media monitoring is happening)	
Contact and brief external stakeholders as required	
Ensure that records of all press and staff briefings are given to the Log Keeper	
Ensure that all key actions are logged by the Log Keeper	
Manage all electronic communications material on the website	



## APPENDIX 7: MEDIA LIAISON AND EXTERNAL COMMUNICATIONS OFFICER

Responsible for providing advice about the impact of the crisis on the public, with emphasis on media strategy and media relations, and ensure that all external relations are conducted in a manner that upholds IGOs reputation/image.

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader	
Start and maintain a personal log (use log book provided)	
Ensure media monitoring is in place (both mainstream press and social media)	
Take decision on the need to otherwise activate third party PR firm to assist	
Determine the media response strategy in the form of the Single Overriding Communications Objective (SOCO) with the CMT Leader and the Board, Market & Shareholder Communications Officer	
Advise the CMT on the media and external relations strategy. (Refer to sections 10 - 11.4 of this standard).	
Liaise with the site to ensure a coordinated media response	
Draft the initial media statement and Q&A. Confirm with the CMT Leader for release and rehearse the spokesperson	
Arrange media interviews and press conferences and support any senior company representative going forward to the affected location.	
Note (3) <b>In the event that an authorised IGO representative must speak with the media, the media meeting area shall be the Jaguar meeting room.</b>	
Issue all written statements to the media and to the public after consultation with legal, the Board Market & Shareholder Communications Officer and the CMT Leader	
Distribute fast facts, photos and file footage to the media	
Maintain an overview of the media/external relations actions taken, monitor their effectiveness and adjust approach as required. (Ensure that external media monitoring is happening)	
Contact and brief external stakeholders as required.	
Ensure that records of all press and staff briefings are given to the Log Keeper	
Ensure that all key actions are logged by the Log Keeper	
Manage all electronic communications material on the website	



## APPENDIX 8: LEGAL AND INSURANCE

Responsible for advice to the CMT on any legal issues.

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader	
Start and maintain a personal log (use log book provided)	
Obtain full details of the emergency/incident/event from CMT Leader	
Evaluate the need for full legal assistance or advice and activate as required	
Provide instruction on legal privilege	
Assist Finance with contractual issues	
Brief the CMT on legal implications and issues pertinent to developing strategies	
Evaluate whether the incident arose because of compliance/non-compliance with the law	
Ensure appropriate actions are being taken against the responsible party, if other than IGO, and direct the compilation of data to assist in case building	
Ensure that all key actions are logged by the Log Keeper	
Liaise with the Log Keeper on the collection, compilation and storage of incident related documentation	
Review the media response to potential legal issues	
<b>Immediately Post Crisis</b>	
Review investigation	



## APPENDIX 9: BUSINESS CONTINUITY PLANNING

Responsible for corporate affairs, financial, telephone responders, contractual and commercial aspects of the crisis or emergency. To provide advice to the CMT about the commercial impact, liabilities and implications of the crisis.

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader	
Start and maintain a personal log (use log book provided)	
Engage with the Media Liaison and External Communications Officer as required and provide them with up to date information	
Ensure manning levels within IGO are adequate and activate additional commercial support as required	
Liaise with relevant business managers to assess the financial impact and projections of the crisis on operations; supply/marketing activities; customer/supplier relations and on stakeholder relations	
Analyse the impact on cash flow	
Initiate/monitor appropriate cost control and recording systems for response and recovery operations	
Brief the CMT on financial and contractual issues arising	
Notify and liaise with insurers, loss adjusters and assessors	
Ensure stakeholders are appropriately informed of relevant developments and decisions	
Establish what external reporting is required to lenders	
Liaise with the Log Keeper on the collection, compilation and storage of incident related documentation	
Ensure that all key actions are logged by the Log Keeper	
<b>Immediately Post Crisis</b>	



## APPENDIX 10: IT DISASTER RECOVERY TEAM

Task	Status
<b>Initial Actions</b>	
Obtain briefing from CMT Leader	
Start and maintain a personal log (use log book provided)	
Establish a recovery team	
Identify key external resources required	
Liaise with the Log Keeper on the collection, compilation and storage of incident related documentation	
Ensure that all key actions are logged by the Log Keeper	
<b>Immediately Post Crisis</b>	

## APPENDIX 11: LOG KEEPER

Your recording role is critical. Do not get involved in any activities other than those on this checklist.

*Responsible for maintaining an accurate and factual record of the sequence of events as they occur for the purposes of strategic planning, briefing session, incident investigation, evidentiary material and internal and external reporting requirements.*

Task	Status
Obtain briefing from CMT Leader or CMT Team Facilitator	
Report to the CMT Team Facilitator for briefing and instruction on any special requirements	
Set up and maintain Master Event Log for the recording of all significant events/developments in chronological order using a computer and data projector or electronic whiteboard, see Appendix 18	
Set up and maintain casualty status board	
Begin recording of events immediately and continually update	
Establish a schedule for periodic review of circumstances	
Keep the CMT Leader and members informed and reminded of pertinent actions and decisions. Remind CMT members of any commitments they have failed to keep	
Collect and collate individual records from all CMT members	

### Notes:

Print copies before advancing/cleaning board, if using a laptop or other computer to record events save the file on a regular basis and ensure hard copies are available always.

Clarify any confusion of events or actions as soon as they become apparent.



## APPENDIX 12: RECEPTION & PHONE COORDINATOR

Note: This role must be allocated to a manager or senior member of staff.

Task	Status
Obtain briefing from CMT Leader or CMT Team Facilitator	
Start and maintain a personal log (use log book provided)	
Once a crisis is declared the reception telephone is to be switched into <b>EMERGENCY</b> mode. This pre-program mode will divert all incoming calls to the reception switch and limit outgoing calls. (Refer to Appendix 17 for phone available for use)	
<b>Set up the Telephone Responders Room with the assistance of IT. This is the Nova Meeting Room unless otherwise directed by the CMT Team Leader</b>	
<b>Find people to assist with manning the Telephone Responders Room and brief them on requirements as documented in the Telephone Responders Guide (see Appendix 13)</b>	
Provide the Telephone Responders with the current Media Statement	
Ensure Telephone Responders keep records of all incoming calls and ensure relevant information is passed onto the CMT	
Liaise with the Log Keeper on the collection, compilation, and storage of incident related documentation	
Ensure that all key actions are logged by the Log Keeper	



## APPENDIX 13: TELEPHONE RESPONDERS GUIDE

This page must be handed to each person assigned to the role of Telephone Responder.

All telephone enquiries received by Perth Office during or after a crisis must be logged and recorded. This is the role of the Telephone Responder.

When answering an incoming call, the Telephone Responder **must record**:

- The name of the person calling
- Their role or interest in the incident if any. Calls from family members, authorities, or the media must be specifically noted
- The callers contact details

This information must be recorded on the **carbonised log sheets** provided by the Reception & Phone Coordinator.

In the event that the caller seeks to know information about the incident, the Telephone Responder must limit their response to reading the approved **Media Statement** provided by the Reception & Phone Coordinator.

In the event that the caller seeks to speak to a named IGO employee, the Telephone Responder must take a message and offer to pass the message on.

When answering an incoming call, the Telephone Responder **must not** provide callers with:

- The direct contact details of any IGO employee or contractor (unless directed by a member of the CMT)
- Any information other than what is written on the approved **Media Statement**



## APPENDIX 14: Initial Media Statement

Statement #

Date

Time

Headline

IGO regrets to advise/reports that a (description of the event) occurred at (location) at approximately (time) today.

Emergency response procedures have been initiated and the company is currently directing all its efforts to ensure the safety of those in the affected area. Few details relating to the incident are available at this time.

Further information will be made available as it comes to hand. Please direct all enquiries to IGOs spokesperson at 08 9238 8300.



## APPENDIX 15: Emergency Contact List

### Internal Contacts

Location	Position	Office	Mobile
Perth Contacts	CEO (Peter Bradford)	08 9238 8301	0447 247 460
	CFO (Scott Steinkrug)	08 9238 8305	0400 202 518
	COO (Matt Dusci)	08 9238 8315	0417 176 879
	General Manager Exploration (Ian Sandl)	08 9238 8376	0408 801 910
	Head of Corporate Development (Andrew Eddowes)	08 9238 8300	0429 920 006
	Head of People & Culture (Sam Retallack)	08 9238 8339	0423 055 465
	Head of Corporate Affairs (Joanne McDonald)	08 9238 8307	0417 940 053
	General Counsel (Kate Barker)	08 9238 8331	0401697 017
	Head of Governance & Risk (Keith Ashby)	08 9238 8313	0458 064 270
	CMT Room	08 9238 8398	
	Reception	08 9238 8300	
Nova Operation Contacts	EMT Room	08 9027 6636	
	ER Coordinator	08 6278 5307	0403 778 781
	Administration	08 6278 5300	
	Resident Mine Manager	08 6278 5311	0407 586 038

### External Contacts

Title	Contact Person	Contact Number	Email
Premier; Minister for Public Sector Management; State Development, Jobs and Trade; Federal-State Relations	Hon. Mark McGowan	+61 8 6552 5000	Mark.Mcgowan@mp.wa.gov.au Government@dpc.wa.gov.au
Deputy Premier; Minister for Health; Mental Health	Hon. Roger Cook	+61 8 6552 6500	Minister.Cook@dpc.wa.gov.au
Minister for Mines and Petroleum; Commerce and Industrial Relations; Electoral Affairs; Asian Engagement	Hon. Bill Johnston	+61 8 6552 6700	Minister.Johnston@dpc.wa.gov.au
Minister for Transport; Planning; Lands	Hon. Rita Saffioti	+61 8 6552 5500	Minister.Saffioti@dpc.wa.gov.au
Treasurer; Minister for Finance; Energy; Aboriginal Affairs	Hon. Ben Wyatt	+61 8 6552 5900	Minister.Wyatt@dpc.wa.gov.au



Title	Contact Person	Contact Number	Email
Minister for Police; Road Safety	Hon. Michelle Roberts	+61 8 6552 6900	Minister.Roberts@dpc.wa.gov.au
Minister for Environment; Disability Services	Hon. Stephen Dawson	+61 8 6552 5800	Minister.Dawson@dpc.wa.gov.au

### Regulatory Authorities

Regulatory Authority	Contact Person	Contact Numbers
ASX	(No particular person)	08 9224 0029 or 1800 021 965
Department of Mines, Industry Regulation and Safety	Dangerous Goods – Incident Reporting	08 9358 8001
	Mine Safety – Accident/Incident Reporting	1800 SAFEMINE (1800 7233 6463)
	WorkSafe	1 800 678 198
Department of Health (DoH)	Director – Environmental Health Julianne Samandari - Executive Officer	+61 08 6495 1111 0448 606 006 wa@eh.org.au
Now called the Department of Water and Environmental Regulation Office of Environmental Protection Authority (OEPA)	24-hour Pollution Watch Hotline	1300 784 782
Department of Fire & Emergency Services	General Enquiries	+61 08 9395 9300 132 500 (State Emergency Service “SES”)



## APPENDIX 16: CMT PREPAREDNESS

### CMT Room

The CMT room must contain the following:

Item	Checked
Copies of all IGO Crisis and Emergency Management Plans, including site ERPs	
Hard Copy of Appendix 15	
Whiteboard (and pens in CMT kit)	
Desktops / Laptops for Log keeper (minimum)	
Carbonised Log Books for all team members	
Hard copies of the Duty Cards (i.e. Appendix 1 - Appendix 12)	
A working teleconference phone	
A working phone with handset for direct communications to the IMT	
Phones for the Telephone Responders Room (Nova Meeting Room)	
Butchers paper	
Soft and hard copy versions of Focus Boards (e.g. - Stakeholder Board, Situation Board, Priority Focus Board, Casualty tracking board)	

### Establish Area to meet with Media

In the event that an authorised IGO representative must speak with the media, the media meeting area shall be the **Jaguar meeting room**. This is to be coordinated by the Media Liaison and External Communications Officer (Communications Manager).

### Establish Area to meet with Next of Kin

In the event that an authorised IGO representative must speak with the Next of Kin at a venue other than their home (for example in a circumstance where there are many people involved), the venue for meeting the Next of Kin meeting shall be arranged by the Internal Communications and Workforce Welfare Officer (HR Manager).

**Note: The venue for the meeting with Next of Kin shall be selected to avoid having Next of Kin and media in the same location and time.**

### Media Training

IGO will arrange for ELT members to complete media and interview training.



## APPENDIX 17: PHONE MANAGEMENT IN A CRISIS

Once a crisis is declared the reception telephone is to be switched into NIGHT2 mode. See Appendix 13: Telephone Responders Guide.

This pre-program mode will divert all incoming calls to the reception switch and limit outgoing calls. Only the following numbers will be capable of making external calls:

### Executive Team

- Ext 8301 – Managing Director
- Ext 305 – Chief Financial Officer
- Ext 307 – Company Secretary
- Ext 373 – Communications Manager
- Ext 308 – Business Development Manager
- Ext 310 – Operations Manager
- Ext 334 - Head of People & Culture
- Ext 335 – Development Manager
- Ext 339 – Human Resources #2
- Ext 340 – Exploration Manager
- Ext 395 – IT Manager
- Ext 313 – Head of HSEQ and Risk

### Rooms

- Board Room / CMT Room – Ext 396
- Jaguar Room / Emergency Call room – Exts: 377, 378, 379, 380
- Reception
- Ext 300 – Normal extension
- Ext 397 & 354 – Spill over phone calls



## APPENDIX 18: INFORMATION CAPTURE AND TRANSFER

### TEAM LOG

DATE/TIME	EVENT

Maintained by the log Keeper in Excel on an LCD display or electronic whiteboard.

### FOCUS BOARD

PEOPLE	ENVIRONMENT	ASSETS	BUSINESS CONTINUITY	LIABILITY	REPUTATION

Enables the team to identify tasks, issues, priorities, plans and strategy.

### STAKEHOLDER BOARD

STAKEHOLDER	PRIORITY	ACTION

Enables the team to establish one on one stakeholder communications.

### CASUALTY TRACKING

NAME OF CASUALTY	STATUS	NEC or NOK	CASUALTY LOCATION	TRANSFER TO	ETD	ETA	TRANSFER BY

Maintained by HR. Nominated emergency contact (NEC) is not necessarily the next of kin (NOK).

### LOCATION BOARD

PROCESS	BUILDINGS	EQUIPMENT	TECHNOLOGY	HR	3rd PARTIES



# APPENDIX 19: PROTOCOL FOR DATA SECURITY BREACH

## IGO protocol for responding to data security breaches

(in conformance with the Australia Privacy Principles [APPs])

IGO has an ongoing obligation to take reasonable steps to handle personal information in accordance with the APPs. This includes protecting personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

### Suspected or known data breach

A data breach is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information, that IGO holds. Includes unintended disclosure of confidential information by IGO personnel or third parties.

### Contain

The first step is to **contain** a suspected or known breach where possible. This means taking immediate steps to limit any further access or distribution of the affected personal information, or the possible compromise of other information.

### Assess

Consideration must be given to whether or not the data breach is likely to result in serious harm to any of the individuals whose information was involved. If we have reasonable grounds to believe this is the case, then IGO must notify the affected individuals, the Privacy Commissioner and other relevant authorities (see review). If we only suspect that this is the case, then we must conduct a risk assessment. As part of the risk assessment, consideration must be given to remedial action where possible.

The risk assessment must specifically include the following steps:

- Initiate: plan the risk assessment and assign a team or person to complete the task
- Investigate: gather relevant information about the incident to determine what has occurred
- Evaluate: make an evidence-based decision about whether serious harm is likely. The risk assessment must be documented.

The risk assessment must be completed expeditiously and, where possible, within 30 days. If it can't be done within 30 days, we are obliged in law to document why this is the case. 'Serious harm' is defined as the release of data, that in the assessment of a 'reasonable person', could credibly result in serious physical, psychological, emotional, financial, or reputational harm.

### Immediate remedial action

Where possible, steps must be taken to reduce any potential harm to individuals. This includes notifying them of the data breach. Next action must be taken to recover lost information, if possible, or change access controls before unauthorised transactions can occur. If remedial action is successful in making serious harm no longer likely, then notification is not required and entities can progress to the review stage.

No | Is serious harm Likely? | Yes

### Notify Authorities

Where serious harm is likely, IGO must prepare a statement for the Privacy Commissioner (a form is available on the Commissioner's website) that contains:

- IGO's identity and contact details
- a description of the breach
- the kind/s of information concerned
- recommended steps for individuals

IGO must also notify affected individuals, and inform them of the contents of this statement. There are three options for notifying:

- Option 1: Notify all individuals
- Option 2: Notify only those individuals at risk of serious harm. If neither of these options are practicable:
- Option 3: A statement must be published on IGO's website and publicised

Consideration must be given to making an apology and providing an explanation of what IGO is doing about the breach.

### Review

Review the incident and take action to prevent future breaches. This may include:

- Fully investigating the cause of the breach
- Developing a prevention plan
- Conducting audits to ensure the plan is implemented
- Updating security/response plan
- Considering changes to policies and procedures
- Revising staff training practices

Consideration must be given to reporting the incident to other relevant bodies, such as:

- police or law enforcement
- ASIC, APRA or the ATO
- The Australian Cyber Security Centre
- professional bodies
- IGO's financial services provider(s)

Note: Where IGO is operating in jurisdictions outside of Australia, we may have notification obligations under other breach notification schemes, such as the EU General Data Protection Regulation.