



## **Appendix A.6**

draft Public Engagement Plan – May 2021 as  
Completed for the Updated 2021 Beaver Dam Mine EIS



**DRAFT PUBLIC ENGAGEMENT PLAN  
Version 1**

Prepared for Atlantic Mining NS Inc.

Prepared by Brighter Community Planning & Consulting



**Beaver Dam Mine Project  
Environmental Impact Statement Update  
May 2021**

## REVISION HISTORY

Version	Date	Notes/Revisions
Version 1	May 2021	Submitted with the Beaver Dam Mine Project 2021 Environmental Impact Statement Update application to the Impact Assessment Agency of Canada and Nova Scotia Environment. Outlines the process of public engagement.

## Executive Summary

Atlantic Mining NS Inc. (AMNS) is seeking the necessary permits to build and operate an open pit gold mine near Marinette, Nova Scotia. AMNS believes that comprehensive and meaningful engagement can anticipate potential concerns and mitigate the impacts to the greatest extent possible. The very act of listening to stakeholders demonstrates openness and allows a relationship to develop, creating an ongoing cycle of communication. By listening to stakeholders, the project becomes better.

The draft Public Engagement Plan establishes how AMNS will interact with stakeholders and rightsholders throughout the life of the mine. It also establishes what success looks like and how it will manage and implement this plan.

Using adaptive management, a process of iteration and adaptation based on data and stakeholder input, the engagement process will be interactive, two-way and strike to create trust and respect. AMNS recognizes that host communities have expertise and knowledge which must be heard and considered.

Project planning for Beaver Dam, and the engagement associated with it, has been underway since 2015. Since the initial engagement activities in 2015, the Project has continued to evolve resulting in more refined technical conclusions, new information from the public and rightsholders, and regulator feedback and Information Requests. This Plan continues to build on the previous engagement work and is informed by the many conversations, meetings and engagements since this 2015.

Through the preliminary engagement, four main organizations arose where a closer relationship is required. Although the Stakeholder Action Plan identifies many important stakeholders, two of these organizations, the Nova Scotia Salmon Association (NSSA) and the ATV clubs, are particularly impacted by the proposed Beaver Dam Mine Project due to the significant infrastructure investments each have made. The other two organizations, Mooseland and Area Community Association and the Sheet Harbour Chamber of Commerce, are links to community groups that represent community perspectives near the mine site.

The residents near Rocky Brook Lake and in Marinette are also important stakeholders. There are no formal groups that capture this geographic area so AMNS will work with these community residents in small groups, as required.

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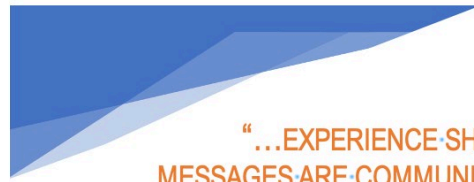
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# 1 INTRODUCTION

Engagement, often referred to more generally as public participation, is important to resolve problems, create a shared understanding with local stakeholders and rightsholders, and build trust around projects that may be controversial. Engagement can also help communities and stakeholders seize and build upon opportunities that the mine project may present. Atlantic Mining NS Inc. (AMNS), is committed to working with stakeholders and rightsholders throughout the Environmental Assessment process and mine life.



“...EXPERIENCE SHOWS THAT MORE MESSAGES ARE COMMUNICATED TO LOCAL COMMUNITIES BY COMPANY BEHAVIORS THAN BY WORDS OR PUBLICATIONS.”

Getting it Right: Making Corporate Community Relations Work

Comprehensive and meaningful engagement can anticipate potential concerns and mitigate the impacts to the greatest extent possible. The very act of listening to stakeholders demonstrates openness and allows a relationship to develop, creating an ongoing cycle of communication. By listening to stakeholders, the project becomes better.

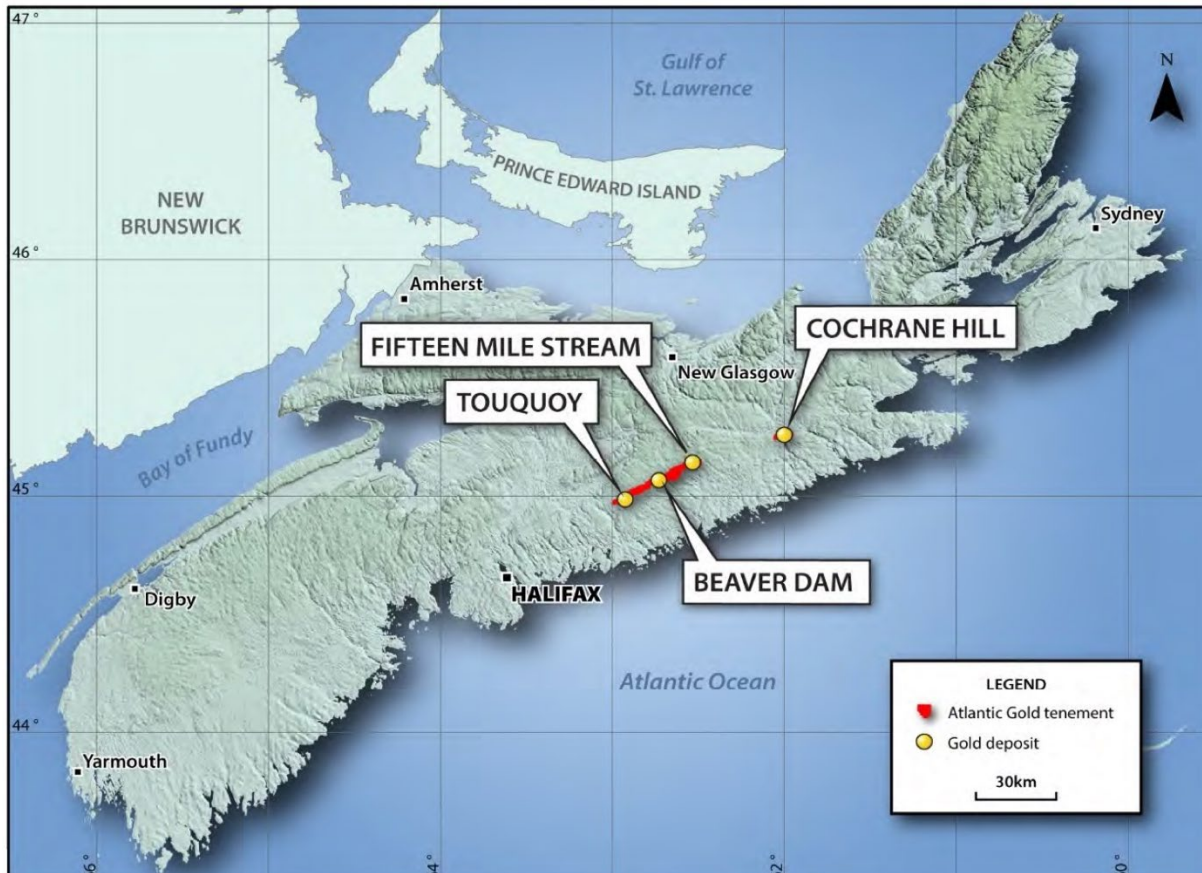
AMNS is seeking to permit, construct and operate an open pit gold mine in Marinette, Nova Scotia. This proposed project will include a haul road between the Beaver Dam Mine Site and the Touquoy processing facility. The haul road will primarily be on existing forestry roads and will be near the community of Mooseland. Although not as populated or close to the haul road or Beaver Dam Mine Site as the community of Mooseland, this plan also identifies Marinette, Moose River, Pleasant Valley and Sheet Harbour as stakeholder communities (Figure 1).

AMNS began stakeholder consultations in advance of the June 12, 2017 submission of the EIS to the Canadian Environmental Assessment Agency (CEAA), now referred to as the Impact Assessment Agency of Canada (IAAC) for the Beaver Dam Mine Project (the Project). On February 19, 2019 AMNS submitted a Revised Environmental Impact Statement (EIS) (AMNS 2019) which detailed engagement activities to that point. In the spring of 2020, AMNS submitted a supplementary engagement action plan that focused on contacting local property owners, seasonal residents, and recreational users.

## 1.1 Context

Project planning, and the engagement associated with it, has been underway since 2015. Since the initial engagement activities in 2015, the Project has continued to evolve resulting in more refined technical conclusions, new information from the public and rightsholders, and regulator feedback and stakeholder comments (CEAA 2017, 2019; ESFWA 2019).

Figure 1: Beaver Dam Mine Project Location



This draft Public Engagement Plan (the Plan), although related specifically to the Project, is linked to other AMNS Projects, including the operating mine at Touquoy and the proposed Fifteen Mile Stream Gold and Cochrane Hills Gold projects. Engagement for the Project is inexorably linked to the operating mine at Touquoy, in particular, due to several factors. These include:

- the proximity of both projects to the community of Mooseland;
- the Beaver Dam Mine Project will not process ore on site, but instead will truck all ore to the Touquoy processing facility; and
- tailings from the Beaver Dam Mine Project will be placed in the mined out Touquoy pit.

Because of geography and the higher level of operational integration, the Beaver Dam Mine and Touquoy Mine currently share a single community liaison committee.



The Project has regional and provincial considerations, and this Plan acknowledges the broader regional context. In particular, AMNS strive to align with the stretch goals established by the Province of Nova Scotia based on the recommendations from the [Now or Never: An Urgent Call to Action for Nova Scotia](#)<sup>1</sup> and tracked through the [OneNS Dashboard](#).<sup>2</sup> The goals from the [Now or Never Report](#) are very much linked to the Atlantic Growth Strategy (AGS), launched by the Government of Canada and the four Atlantic provinces in 2016. The AGS is focused on, “targeted actions to stimulate the region’s economy, support both innovative and traditional industries, increase job opportunities for Atlantic Canadians and focus on persistent and emerging regional challenges.”<sup>3</sup> AMNS hears the call to action articulated in these two documents and wants to be part of this broader movement to support Nova Scotia’s and Atlantic Canada’s continued growth and development, and engagement is critical to finding alignments with these important goals and strategies.

## 1.2 Plan Objectives

The Guidelines for the Preparation of an Environmental Assessment states, “Meaningful public participation is best achieved when all parties have a clear understanding of the proposed project as early as possible in the review process. The proponent is required to provide current information about the project to the public and especially to the communities likely to be most affected by the project.” (CEAA 2016). The short-term objectives of this Plan must meet or exceed the requirements of the Project Guidelines issued by IAAC (CEAA 2016), while also ensuring engagement occurs over the life of the project once the Environmental Assessment is complete.



The objectives of this Plan are:

- to listen and incorporate into the EIS the community knowledge gathered from stakeholders and rightsholders;
- to determine opportunities to include participation of stakeholders during the development and implementation of the follow up program and future management plans;
- to seek input and feedback on the spatial and temporal boundaries used by this EIS;
- to provide information to stakeholders, particularly those most potentially impacted by the Project;
- to build meaningful, two-way relationships with communities most impacted to address any current or potential future land use conflicts; and
- to gather and consider local and regional knowledge and expertise during construction, operations, active closure, and post-closure.

This draft Public Engagement Plan does not include Indigenous engagement. This is addressed through a separate draft Indigenous Peoples Plan which is currently under confidential cover.

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<sup>1</sup> <https://www.onens.ca/sites/default/files/editor-uploads/now-or-never.pdf> 2014

<sup>2</sup> <https://www.onens.ca/>

<sup>3</sup> <https://www.canada.ca/en/atlantic-canada-opportunities/news/2017/01/backgrounder-atlantic-growth-strategy.html>

## 1.3 Plan Foundations

All AMNS activities use the values of its parent company, St Barbara Limited, as its foundations to create meaningful, two-way conversations throughout the life of the mine. AMNS Corporate Values are (Figure 2):

**Figure 2: Atlantic Mining NS Inc. Corporate Values**



Note: AMNS Corporate Values are adopted from St Barbara Limited. AMNS is a wholly owned subsidiary of St Barbara Limited.

More specifically, by building on our values AMNS is committed to:

- Helping rural Nova Scotia thrive;
- Creating high paying jobs;
- Helping people stay or return home; and
- Protecting the environment for generations to come.

The Plan also references or is guided by existing policies and procedures (Appendix 1) including, but not limited to:

- Code of Conduct Policy;
- Complaint Resolution Plan and Form – 2016;
- Community Relations Policy;
- Continuous Disclosure and External Communications Policy;
- Donations Sponsorship Community Programs Policy;
- Social Media Policy; and
- Workplace Behaviour Policy.

## **1.4 Plan Structure**

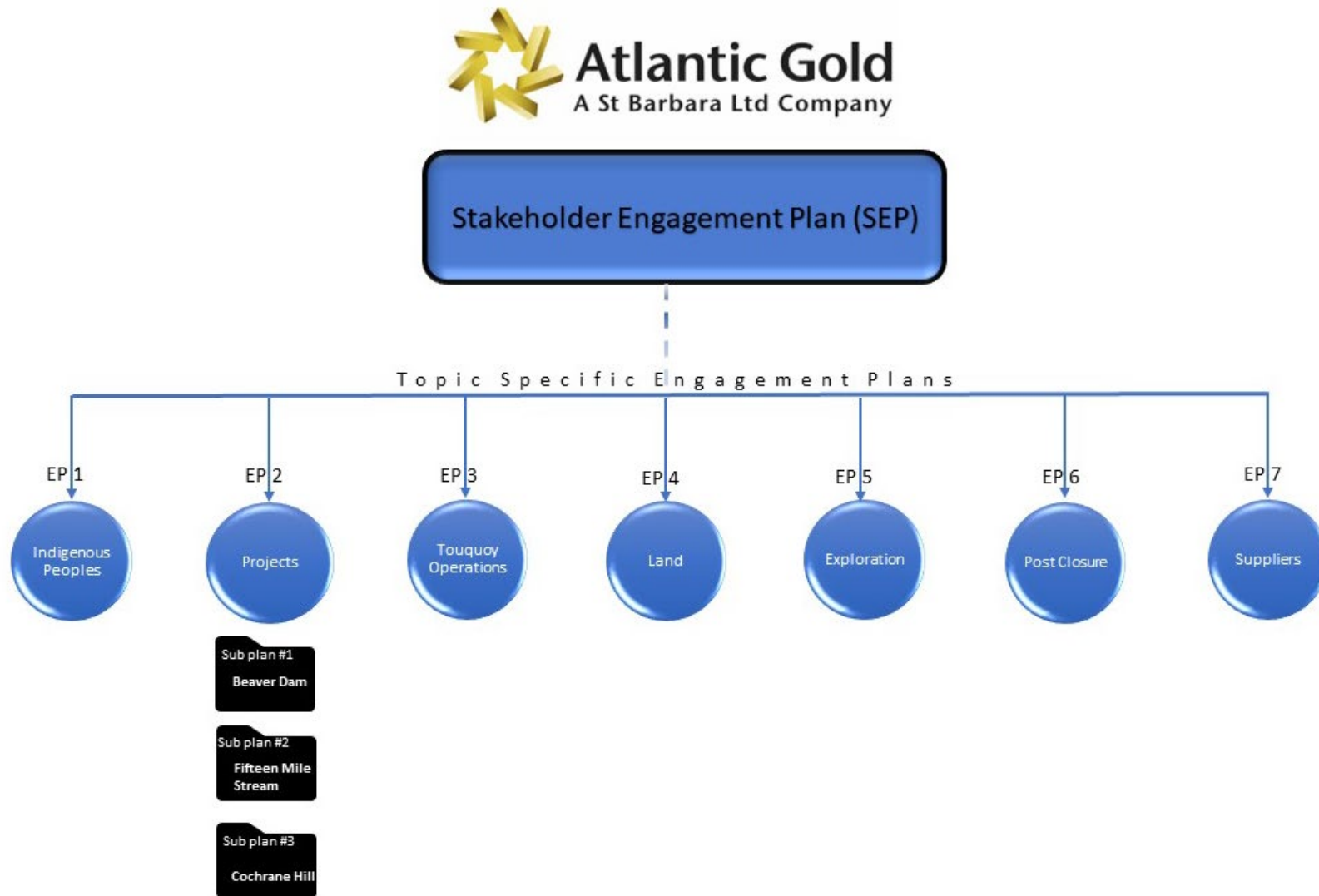
AMNS has an overarching Stakeholder Engagement Plan (SEP), which is comprised of a series of Engagement Plans (EP) for specific elements of AMNS activities. The Projects EP (EP2) is broken into a series of sub-plans or action plans to address each mine project during the EA process, construction, operations and closure (Figure 3). The Beaver Dam Mine Engagement Plan will link to other subplans such as a draft Indigenous Peoples Plan, currently under confidential cover.

## **1.5 Third Party Contractors**

AMNS often engages contractors to complete tasks on its behalf. Though each contractor is a separate legal entity responsible for complying with all relevant regulations and for completing work according to industry best practices, stakeholder may not recognize this distinction. AMNS wants to ensure that all contractors acting on its behalf represent our company's values and high standards when dealing with the public, stakeholders and rightsholders.

AMNS will require engagement plans as part of its tendering process for contractors who interact with stakeholders or may interact with stakeholders. This Plan will be consistent with AMNS overall Stakeholder Engagement Plan and will be submitted in advance of the any work commencing. All contractors will be provided with the Community Relations business card, that contains the community relations phone number and email address which can be distributed to the public. All interactions relating to an AMNS project will be copied to AMNS for inclusion its engagement register.

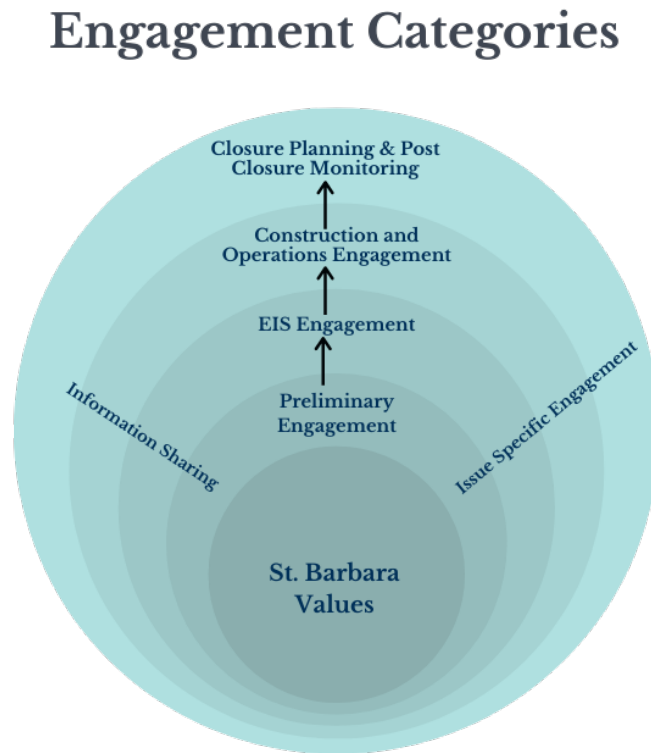
Figure 3: Stakeholder Engagement Framework



## 2 ENGAGEMENT CATEGORIES

Engagement begins long before the EIS is submitted to the regulators and continues throughout the life of the Project. Engagement is not necessarily linear but generally falls within the following categories which can be linked to a certain time period (Figure 4). AMNS is committed to engagement with stakeholders throughout the life of the mine (Table 1).

Figure 4: Engagement Categories



**Table 1: Explanation of Engagement Categories**

Engagement Categories	Relationship to Beaver Dam Project	Status	Timeline	Tools
Preliminary Engagement	This activity occurred before the Project Description was submitted to IAAC and helped to identify Valued Components, potential impacts, temporal and spatial boundaries and preliminary mitigation strategies.	Complete	2015 to 2017	Open House(s), stakeholder meetings, CLC, website and one-on-one meetings with various stakeholders.
Environmental Impact Statement Engagement	Engagement occurs to meet the intent and spirit of the Project Guidelines. Engagement is documented and included in the EIS. Engagement is ongoing until a decision is rendered by the Agency.	Ongoing	2017 to 2021	Open houses, on-line meetings, meetings with adjacent communities, community engagement email and phone line, newsletters, flyers, Plain Language Summary, door knocks, meeting with key concern specific groups, site visits.
Construction and Operation Engagement	Once a Project is under construction or development, engagement will contribute to the adaptive management systems, assess and manage stakeholder concerns and benefits, and implement commitments. Communication on AMNS activities will occur during this time.	Ongoing	2022	CLC meetings, yearly open houses with local communities; grievance management system; local office with information; supplier and employment sessions; communication with HRM elected officials; site tours; social impact assessment; joint monitoring programs; yearly mail drop to Mooseland and Marinette communities.
Closure Planning and Post-closure Engagement	Before closure and during post-closure, stakeholders will be engaged to provide input and comments on closing and reclamation planning.	Not started	2022 to 2030+	Closure Planning and Post Closure Monitoring Engagement Plan (to be developed in 2022).
Key Concerns Specific Engagement	Occasionally specific concerns arise that require detailed conversations with specific stakeholders. This type of engagement occurs on an as-required basis. If this type of engagement occurs during the preparation of the EIS, it will be documented in the revised EIS. Key concern specific engagement may occur through the mine life.	Ongoing	Throughout project, as needed	Meetings and engagement as required; monitoring of arising key concerns and grievances; input into adaptive management.
Information Sharing	To support meaningful conversations with stakeholders, technical, socio-economic and company information is shared with the public and stakeholders.	Ongoing	Throughout project, as needed	Public releases of reports, plain language documents; newsletters, media releases, regular meetings with key stakeholder groups, data sharing agreements.

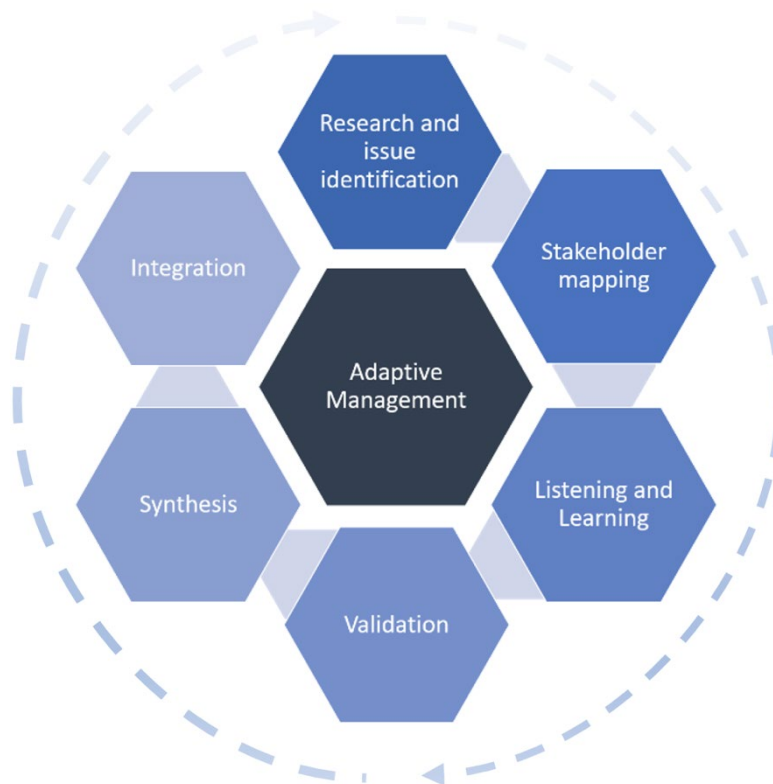
Notes: IAAC = Impact Assessment Agency of Canada; CLC = Community Liaison Committee; EIS = Environmental Impact Statement; AMNS = Atlantic Mining NS Inc.; HRM = Halifax Regional Municipality.

## 2.1 Engagement Process

Engagement follows a process that includes several elements as shown in Figure 5. The Engagement elements are centred around an adaptive management approach for managing key concerns and operations. Adaptive management is a term that arose from the environmental field but also has applicability for general management principles. The Mining Association of Canada established “Toward Sustainable Mining” Guiding principles, which inform how AMNS adaptive management approach will be implemented.

Adaptive management is the process of working with stakeholders to identify outcomes, implementing a particular course of action to meet that outcome, measuring the outcome and then making changes in an iterative way (adapting) as needed based on data and input received from stakeholders and other sources to reach the desired outcome.

**Figure 5: Engagement Process**



AMNS has created its own adaptive management process, which includes the following steps:

- **Research and preliminary concern identification** – This basic information gathering includes understanding the history, context of the project, key sensitivities, and community and regional perspectives so that preliminary concerns can be identified for further discussion and exploration with the stakeholders.
- **Stakeholder mapping and identification** – At this stage, the “who needs to be contacted or communicated with” is determined. This allows for a fuller understanding of the stakeholder ecosystem.

- **Listening and Learning** – Through focused efforts to engage the initial list of stakeholders and identifying other stakeholders who were missed in the previous step, the project team will listen and learn. Key questions are asked, such as:
  - What is important to you about this project?
  - Tell us about your community, organization or group? What is critical for you over the next few years? What do you value about your community?
  - What are your concerns about the project?
  - What additional information do you need to better understand the project? What information can you share to help us better understand your point of view?
  - How do you want to be involved? What is the best way to communicate with you?
  - How can AMNS support the work you are already doing? Are you active in the area of the proposed mine site?
  - What benefits, if any, do you hope your community, organization or group realizes from this project?
  - Are you interested in partnering around a potential issue or project?
  - Who else should we talk to?
  - What does AMNS need to understand?
- **Validation** – Throughout and after the listening and learning, we will validate our understanding of what we heard through follow up communications, summary documents, and other validation tools.
- **Synthesis** – The engagement perspectives and key concerns will be synthesized to identify themes, trends, areas of concerns and opportunities.
- **Integration** – The engagement data will be integrated into the appropriate project category. This could include the EIS, construction, operation or post closure phase of the mine. It is through the integration step that changes and adaptations to plans, operations and activities will occur.

## 2.2 Annual Cycle of Engagement

Engagement will occur throughout the life of the mine. A list of proposed engagement activities for the Project is detailed in the Stakeholder Action Plan (Section 3).

The list below details the major elements of the engagement plan:

- **CLC meetings** – The Community Liaison Committee is a community based advisory committee that provides advice and guidance regarding Beaver Dam and Touquoy. Chaired by a community member, it acts as an intermediary between the local community and the mine project. It meets quarterly and can advocate for key concerns important to the local community.
- **Yearly open house in Mooseland** – Throughout the life of the mine project, AMNS will hold a yearly open house to provide updates on the Project, seek feedback on specific elements identified by the CLC as areas of potential concern or opportunity, and meet with the local residents on topics of interest.
- **Regular quarterly community newsletters** – The quarterly newsletter communicates AMNS activities, provides education on mining topics and highlights community investments and partnership activities.



- **Community relation email and phone line available for public contact** – AMNS will maintain a phone/text number and email so that members of the public can easily contact the company. AMNS will publish this contact information on the company’s website, in the newsletter and on public signs in and around the mine site. AMNS staff will have access to business cards with this information so that it can be passed out to anyone who wishes to make contact. All contact will be logged and followed up on in a timely fashion. The Complaints Resolution Plan will be followed for any complaints received.
- **Quarterly meetings with the Nova Scotia Salmon Association (NSSA)** – The NSSA is undertaking a significant restoration project near the Beaver Dam mine. Atlantic Gold wishes to collaborate and support this important work and will meet with the NSSA quarterly to share information and maintain a positive working relationship.
- **Formal data sharing agreements** – In situations where datasets can be shared with other organizations, AMNS will enter into formal data sharing agreements.
- **Ad hoc advisory committee** – AMNS will form temporary working groups to seek feedback, input and guidance on Management Plans that are under development or review. These ad hoc advisory committees will assist in setting objectives or providing advice on specific key concerns. Areas where AMNS may establish working groups:
  - Access and Safety Management Plan for Haul Road.

## 2.3 Key Concern Specific Engagement

Key concern specific engagement will be required as concerns emerge. By having a public phone/text line and community relations email address, stakeholders can flag topics that require deeper engagement. The format and path of each of these engagements will vary based on the topic, scale and if the topic requires a quick response.

Throughout the life of the mine, it will be important that AMNS public contact information is accessible to stakeholders and public. AMNS will promote these communication avenues through each newsletter, the CLC members and on any signage installed in or around the project area. Access to AMNS staff will also occur as outlined in the Stakeholder Action Plan during regularly scheduled meetings and the yearly open houses with the local community. These face-to-face interactions will provide opportunity for key concern specific engagement to occur.

## 2.4 Engagement Register

AMNS, through its use of an engagement software program, will maintain an engagement register that documents stakeholder interactions. However, the register is more than simply a list of conversations and meetings. The register will identify areas of concerns, key concern follow-up communications, and commitments.

Commitments are actions that AMNS formally agrees to do. The Engagement Register will track all commitments made to stakeholders by AMNS, with the goal of building positive relationships with our neighbours, host communities, rightsholders and stakeholders. It is one of the values of St Barbara Limited, the parent company of AMNS, to deliver to promise. The commitments are our promise.

## 2.5 Indicators of Success

How will AMNS know if this plan is successfully achieving its objectives? The answer is through establishing indicators and consistently reporting successes and where additional efforts are required. Indicators of success is detailed in Table 2.

**Table 2: Indicators of Success**

Success looks like...	Measurements
<b>That AMNS delivers on all its commitments</b>	<ul style="list-style-type: none"> <li>• SOP for commitment approval and tracking in commitment register.</li> <li>• Commitments are budgeted and integrated into yearly work plans.</li> <li>• Commitments are tracked and reviewed quarterly.</li> </ul>
<b>Stakeholders know how to contact AMNS to report concerns, problems or opportunities</b>	<ul style="list-style-type: none"> <li>• Contact information is placed on all communication materials.</li> <li>• Every AMNS employee and contractor will receive training in stakeholder relations.</li> <li>• Every employee and contractor will have access to the Community Relations business card to hand out to the public as required.</li> <li>• The number of people who contact Atlantic Gold through established communication channels increases.</li> <li>• A decline year over year in complaints that community members/stakeholders did not know how to reach AMNS or how to register a complaint.</li> </ul>
<b>That key concerns identified by are stakeholders are resolved in a timely manner</b>	<ul style="list-style-type: none"> <li>• SOP/policy for complaints is updated and followed</li> <li>• The number of days to resolve a complaint decline.</li> <li>• Monthly reports to senior management reporting on open, closed and unresolved grievances.</li> <li>• Quarterly review of grievances for input into adaptive management practices. Number of changes to management plans or operations as a result of a grievance is commensurate with the input received.</li> <li>• Changes in management plans that arise from grievances are reported to CLC and other relevant stakeholders.</li> </ul>
<b>Key stakeholders and rightsholders are regularly communicated with and know about concerns of importance to them</b>	<ul style="list-style-type: none"> <li>• Yearly perception survey with stakeholders.</li> <li>• Stakeholder action plan delivered and reviewed annually.</li> <li>• Stakeholder mapping updated quarterly.</li> <li>• Where appropriate, data sharing agreements are entered into with stakeholders.</li> <li>• Quarterly newsletter is issued with information that provides relevant information and information of interest to stakeholders.</li> <li>• The newsletter is being opened and read.</li> <li>• The number of subscribers to the newsletter increases year over year.</li> </ul>
<b>Stakeholders influence AMNS's decisions (adaptive management)</b>	<ul style="list-style-type: none"> <li>• CLC meets regularly, and agenda includes input into management plan updates.</li> <li>• Management plans and operational processes are updated in accordance with approvals and permits.</li> <li>• Stakeholder input is documented and tracked to identify trends and emerging key concerns.</li> </ul>
<b>The safety of AMNS staff and contractors, and the public meets AMNS's high standards while maintaining access to recreational lands. Conflicts are resolved quickly.</b>	<ul style="list-style-type: none"> <li>• Regular communication with Beaver Dam area ATV users is maintained.</li> <li>• Signage is installed and maintained (e.g., low sign vandalism rates).</li> <li>• Safety or road conflicts are reported and resolved in a timely manner as per Health Safety and Management Plan.</li> <li>• Access Management plan is reviewed yearly with input from users.</li> </ul>
<b>A positive working relationship with the Mooseland and Area Community Association</b>	<ul style="list-style-type: none"> <li>• Number of grievances from local communities declines year over year.</li> <li>• Yearly open house that is well attended.</li> <li>• Chair and local senior staff interact regularly.</li> <li>• AMNS supports the capacity of local community to implement its own vision.</li> </ul>

Notes: SOP = specific operating procedure; CLC = Community Liaison Committee; AMNS = Atlantic Mining NS Inc.

## 2.6 COVID-19

The COVID-19 pandemic has posed significant hurdles to engagement for many reasons. These reasons include:

- Public Health directives limiting the size of gatherings.
- Restrictions on travel.
- Limited or no internet connections in our host communities or stakeholders not having access to internet, thereby eliminating online meeting opportunities.
- Social trauma – People are preoccupied with other issues and are not able to focus on AMNS consultations.
- AMNS and all businesses have had to move to a different model of operations (staff working from home, working on-line etc.) which has caused some delays.
- Non-governmental organizations (NGOs) and community groups are experiencing similar pressures to meet on-line and operate in a different way, which has caused delays in meeting.

As the entire world awaits the delivery of a safe and effective vaccine to the general population, AMNS will continue to engage with stakeholders in a safe and effective manner. This will mean more one on one or small group meetings, the use of online tools and increased reliance on phone and email contact. The Plain Language Summary prepared by AMNS in 2020 will continue to be circulated and updated as required (AMNS 2021).

Predictions regarding if and when society will return to “normal” are difficult to make. However, AMNS commits to continued engagement through the pandemic in accordance with public health directives, while maintaining the safety of AMNS operations.

### 3 STAKEHOLDER ACTION PLAN

The stakeholder engagement framework diagram (Section 1.4, Figure 2) identifies the stakeholder groups, the reasons why engagement is important, what needs to be communicated, what engagement category it falls within and how AMNS plans to engage with the stakeholder.

Through the preliminary engagement, four main organizations arose where a closer relationship is required. Although the Stakeholder Action Plan identifies many important stakeholders, two of these organizations, the NSSA and the ATV clubs, are particularly impacted by the proposed Project due to the significant infrastructure investments each have made. The other two organizations, Mooseland and Area Community Association (MACA) and the Sheet Harbour Chamber of Commerce, are links to community groups that represent community perspectives near the mine site. When AMNS works with a community organization or other NGOs, information will be provided with a request that it be shared through the NGOs membership and broader network.

The residents near Rocky Brook Lake and in Marinette are also important stakeholders. There are no formal groups that capture this geographic area so AMNS will work with these community residents in small groups, as required.

#### 3.1 Nova Scotia Salmon Association

AMNS, through this Stakeholder Action Plan, acknowledges the significant and important activities of the Nova Scotia Salmon Association. The Acid Rain Mitigation (ARM) Project on the West River is of particular importance. In recent years, the NSSA has received funding from the federal government, “to improve the water quality of fish habitat using aquatic, in-stream liming.”<sup>4</sup> The Acid Rain Mitigation Project is just one of the many initiatives that support the overarching goal of the NSSA to “maximize the likelihood of survival and sustainability of our fish, rivers and recreation.” (NSSA 2020).

AMNS wants the NSSA to be successful in its efforts to protect Nova Scotia's fish and waterways. We recognize that some may consider the Beaver Dam project a threat to the work of the NSSA. However, AMNS believes we can help and will look for opportunities to work with the NSSA to assist where possible. Adaptive management, at its core, is about continually improving the way we operate through the collection of qualitative and quantitative data and using that data to make changes to management plans and operations. AMNS will actively seek opportunities for the NSSA to contribute to the adaptive management process outlined earlier in this document.

Through discussions, AMNS will explore collaboration. This Plan does not propose specific solutions or projects but does proposed the exploration of opportunities that could prove beneficial to the mandate of the NSSA, and we are open to those discussions. Potential projects could include:

- community outreach programs;
- shared infrastructure;
- opportunities for joint research programs; and
- partnering on a community-based monitoring program.

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<sup>4</sup> <https://www.nssalmon.ca/acid-rain-mitigation> (web reference December 2020)

As part of the ARM Project on the West River, the NSSA installed a lime doser site along the Killag River in 2016. AMNS commits to working with the NSSA to support the continued access to and operation of this lime doser site. The specifics of this support will be finalized through discussions with the NSSA.

## **3.2 All-Terrain Vehicle and Snowmobile Groups**

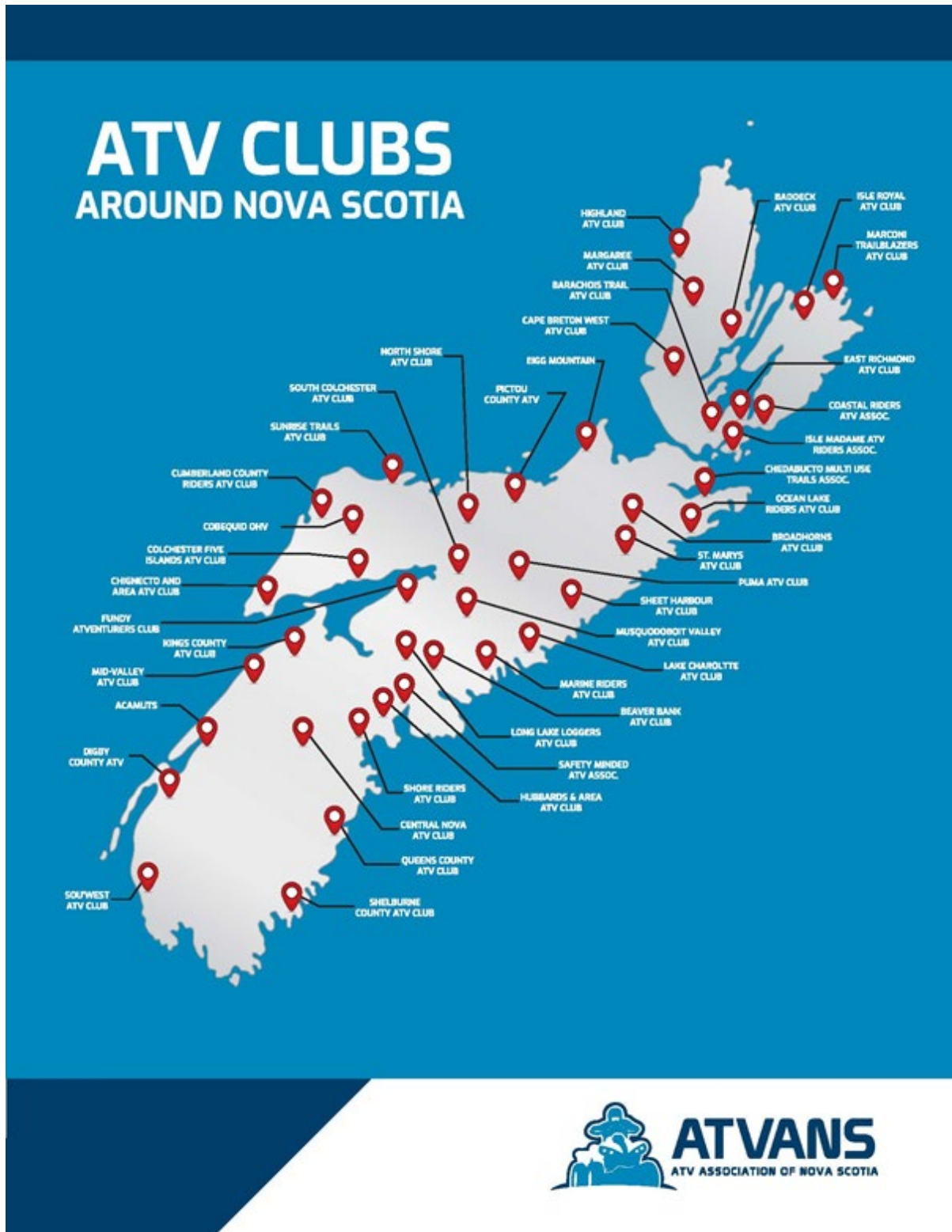
AMNS has clearly heard that the area in and around the Beaver Dam Mine Site is used extensively for recreational land uses, such as ATVing, hiking, hunting, fishing and snowmobiling. Local ATV clubs (PUMA, Sheet Harbour and Lake Charlotte) (Figure 6), along with the All-Terrain Vehicle Association of Nova Scotia (ATVANS) have made considerable investments in the construction and maintenance of trails and related infrastructure for its members use. These same trails are used also by non-members. The local clubs are run by groups of committed, passionate volunteers who build and manage their own trails systems (Figure 7).

The Haul Road and Beaver Dam Mine Site intersect with many of these trails, some of which provide provincial and regional connections. These trails are well travelled. The Haul Road will include both crossings for recreational land users and bypass routes for continued connectivity. The safety of all parties – recreational land users, AMNS staff and contractors, and the general public – is critical and AMNS will work closely with the ATV clubs on the concerns of safety and accessibility.

AMNS is also interesting in having discussions with the ATV clubs on potential community investment opportunities and partnerships that further our shared interests. These could include:

- trail construction;
- trail maintenance; and
- safety and education programs.

Figure 6: Local Clubs around the Beaver Dam Mine Site



Source: ATVANS 2020.

Prepared For:



FIGURE 7

### Beaver Dam Mine Project Haul Road and Recreational Trails

- Secondary Access Point
- Stop Sign and Crossing Location
- Proposed Trail End
- Proposed Alternative ATV route
- Proposed Trail Connector
- Proposed Multi-use Bypass
- Haul Road Centerline
- ATVANS Active Trail
- Collector Road
- Local Road
- Seasonal Road
- Diveways (>300 m)
- Track
- Trail
- Streams
- Proposed Infrastructure
- Touquoy Infrastructure Layout
- Lakes
- Beaver Lake IR
- Proposed Property Boundary



Coordinate System: NAD 1983 CSRS UTM Zone 20N  
 Projection: Transverse Mercator  
 Datum: North American 1983 CSRS  
 Units: Meter

0 0.75 1.5 3 Kilometers

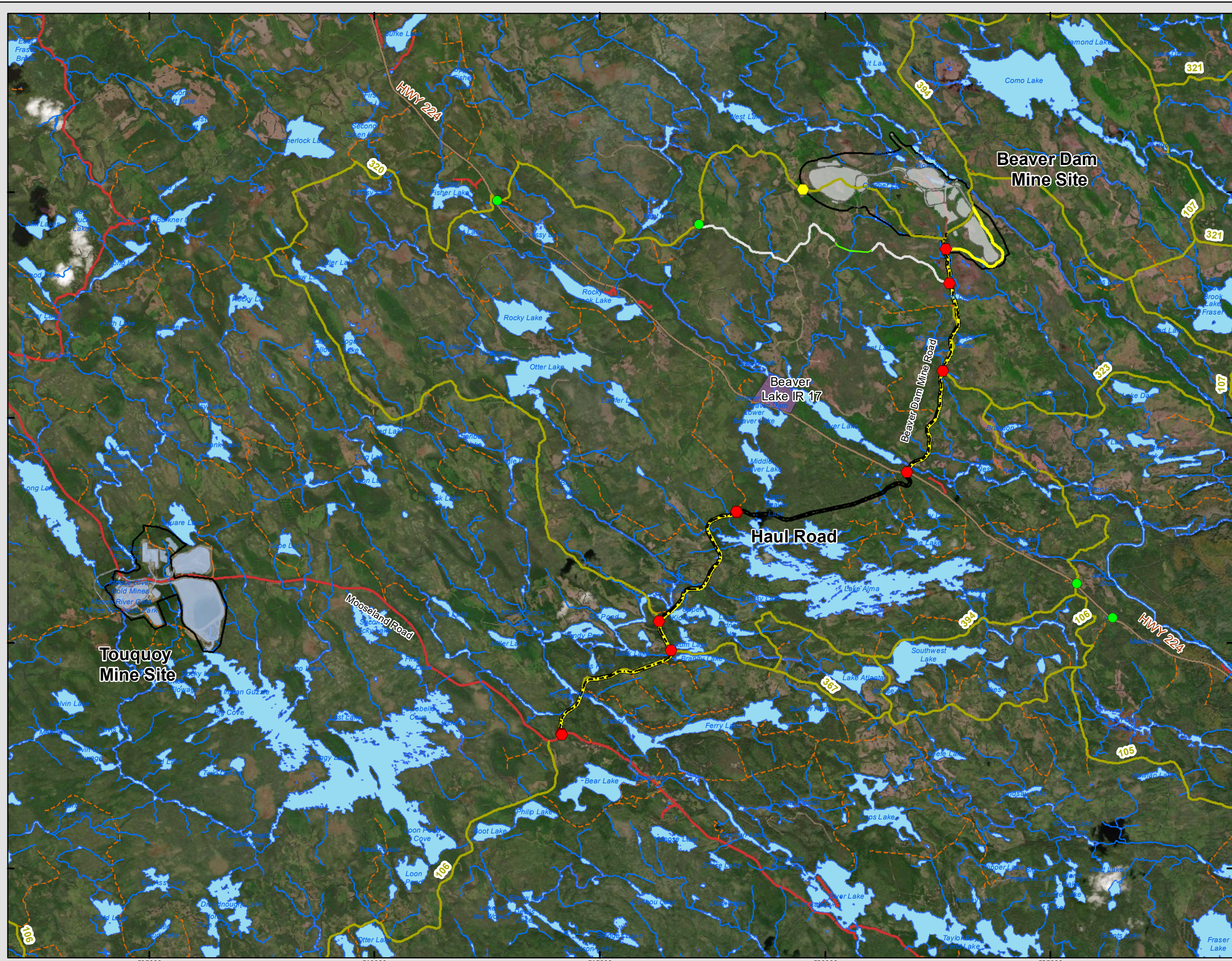
1:78,600 Scale when printed @ 11" x 17"

Drawn By: EP Date: 2021-06-01  
 Reviewed By: LP

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community  
 Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri



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### **3.3 Mooseland and Area Community Association**

The MACA is active in the community of Mooseland and includes the smaller communities of Jacket Lake and River Lake. This community organization manages the Mooseland Community Centre and hosts occasional community activities. The MACA has established a working committee that has met with AMNS representatives to discuss potential community investments and to provide input and feedback on the proposed Project.

Given the small population of the Mooseland community, AMNS has worked with this organization and will continue to do so, as many of the permanent and seasonal residents of the area are affiliated with it. AMNS is committed to working with this community on potential mitigation options, adaptive management inputs and to identify community development opportunities.

### **3.4 Sheet Harbour Chamber of Commerce and Civic Affairs**

The Sheet Harbour Chamber of Commerce is a business organization located in Sheet Harbour, but also hosts a website promoting the Sheet Harbour area. Under the Atlantic Gold banner, AMNS is a member of this organization. This membership will be maintained over the life of the Project.

Although Sheet Harbour is approximately 25 minutes from the proposed Beaver Dam Mine Site, it is the largest community in the vicinity. Direct impacts from construction and operations on Sheet Harbour will be related to socio-economic concerns and will be positive; however, AMNS needs to establish a feedback loop as part of this Plan with the community to monitor this assumption. Housing availability, the local hospital and businesses could experience changes if and when the mine begins operation. AMNS also sees community and economic development opportunities that can align with the provincial economic development priorities of improved social wellbeing, increased population and economic growth.

### **3.5 Implementation of Stakeholder Action Plan**

AMNS commits to implementing this Stakeholder Action Plan (Table 3). The implementation of this Plan will be monitored by AMNS and tracked through indicators of success (Section 2.5, Table 2). This Plan will be updated yearly with changes and improvements as identified by our stakeholders, the CLC and AMNS staff and senior management.

Staff responsible for implementing the Stakeholder Action Plan may have optional Key Performance Indicators (KPIs) imbedded within their yearly performance management system so that it is implemented throughout the company. Implementation of this Plan will be reported on yearly to:

- the CLC;
- senior management;
- the NSSA;
- the ATV clubs;
- the Community of Mooseland, Marinette and Pleasant Valley; and
- through the corporate website and newsletter.



**Table 3: Stakeholder Action Plan**

Who to Engage	Why Engage?	Engagement Topics	Engagement Category	How to Engage
Private Landowners/Leaseholders directly impacted by Project: <ul style="list-style-type: none"> <li>John Dickson</li> <li>Debbie Marlborough</li> <li>Deepwood Estates</li> <li>Marilyn Prest</li> </ul>	<ul style="list-style-type: none"> <li>To receive input into mitigation strategies.</li> <li>These stakeholders have legal rights through fee simple title, leasehold interest or easements.</li> <li>To ensure safety and reduce land use conflicts.</li> <li>To confirm and monitor access.</li> </ul>	<ul style="list-style-type: none"> <li>Progress on approvals.</li> <li>Communicate changes in project operations.</li> <li>Any information that may impact their property or access.</li> </ul>	<ul style="list-style-type: none"> <li>EIS Engagement</li> <li>Operational Engagement</li> <li>Post-closure</li> </ul>	<ul style="list-style-type: none"> <li>Written correspondence</li> <li>One on one meetings</li> </ul>
Local Communities impacted by Project: <ul style="list-style-type: none"> <li>Community of Mooseland (including Ferry Lake, River and Jacket Lake) (MACA)</li> <li>Community of Rocky Lake</li> <li>Community of Marinette</li> <li>Community of Sheet Harbour (Chamber of Commerce)</li> </ul>	<ul style="list-style-type: none"> <li>To maintain two-way dialogue.</li> <li>To resolve grievances.</li> <li>To share project status.</li> <li>To provide opportunity to input into reclamation plans.</li> <li>To track community benefits and potential impacts.</li> <li>To determine potential social benefits that AMNS could support.</li> <li>To seek input into mitigation strategies.</li> </ul>	<ul style="list-style-type: none"> <li>Updates on project or mine operations.</li> <li>Assessment of potential positive and negative impacts of operation on community.</li> <li>Share any upcoming activities which could impact community (e.g., haul road maintenance or noise).</li> <li>Share status of other AMNS projects.</li> <li>Introduce new staff contacts.</li> <li>Community development.</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary engagement</li> <li>EIS Engagement</li> <li>Operational Engagement</li> <li>Post-closure</li> <li>Key Concern Specific Engagement</li> </ul>	<ul style="list-style-type: none"> <li>Yearly open houses</li> <li>Yearly flyer</li> <li>Community relations email and phone number</li> <li>Grievance register</li> <li>Twice yearly presentation to MACA</li> <li>CLC</li> <li>Regular hours at local office in sheet harbour</li> </ul>
Businesses directly impacted by the Project: <ul style="list-style-type: none"> <li>Northern Timber</li> <li>Musquodoboit Lumber Co.</li> <li>Prest Brothers Ltd.</li> </ul>	<ul style="list-style-type: none"> <li>To comply with legal agreements.</li> <li>To collaborate on safety protocols.</li> <li>To ensure operations can continue for both parties as required.</li> <li>To receive input into mitigation strategies.</li> </ul>	<ul style="list-style-type: none"> <li>Seek contributions to adaptive management planning.</li> <li>Operational changes that impact their operations.</li> <li>Assessment of benefits.</li> <li>Share of information of impacts on each other's operations.</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Engagement</li> <li>EIS Engagement</li> <li>Operational Engagement</li> <li>Post Closure</li> <li>Key Concern Specific Engagement</li> </ul>	<ul style="list-style-type: none"> <li>One on one meetings as required</li> <li>Timely communication on operation concerns</li> </ul>
Recreational Land users – Individuals not part of the ATV clubs but who have camps or properties nearby or people who regularly access the trails and land around the Project	<ul style="list-style-type: none"> <li>To receive input into mitigation strategies.</li> <li>To resolve potential land use conflicts.</li> </ul>	<ul style="list-style-type: none"> <li>Information sharing on haul road and by-pass routes.</li> <li>Receive information on activities of users.</li> <li>Identify potential projects on which AMNS and user groups could collaborate.</li> <li>Seek contributions to adaptive management planning.</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Engagement</li> <li>EIS Engagement</li> <li>Operational Engagement</li> <li>Post Closure</li> <li>Key Concern Specific Engagement</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Invitation to yearly public open houses</li> <li>Ad hoc advisory committee</li> </ul>
Environmental Groups/NGOs: <ul style="list-style-type: none"> <li>ESFWA</li> <li>NSSA</li> <li>Icelandic Memorial Society</li> <li>Save Caribou</li> <li>Otter Pond Demonstration Forest</li> </ul>	<ul style="list-style-type: none"> <li>To share information on activities and project to reduce or eliminate potential conflicts.</li> <li>To receive input into mitigation strategies.</li> <li>To report on commitments/offsetting.</li> <li>To share technical information as appropriate.</li> <li>To mitigate impacts on their operations and seek input to adaptive management practices.</li> </ul>	<ul style="list-style-type: none"> <li>Identify and explore specific key concerns where operational improvements should be considered.</li> <li>Identify potential projects on which AMNS and user groups could collaborate.</li> <li>Mutual sharing of relevant scientific data.</li> <li>Mutual sharing of upcoming operation activities of interest.</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary engagement</li> <li>EIS engagement</li> <li>Operational Engagement</li> <li>Post-closure</li> <li>Key Concern Specific Engagement</li> </ul>	<ul style="list-style-type: none"> <li>Providing yearly project updates in written form</li> <li>Key concern specific meetings as required</li> <li>Quarterly meetings with NSSA</li> <li>Data sharing agreements</li> <li>Participation in ad hoc working groups as required</li> </ul>
ATV and Snowmobile Groups: <ul style="list-style-type: none"> <li>ATVANS</li> <li>Sheet Harbour ATV and Snowmobile Club</li> <li>PUMA ATV Club</li> <li>Lake Charlotte ATV Club</li> </ul>	<ul style="list-style-type: none"> <li>To develop partnerships for trail construction and operation.</li> <li>To reduce or eliminate land use conflicts.</li> <li>To seek advice and learn from their expertise.</li> </ul>	<ul style="list-style-type: none"> <li>Information sharing on haul road and by-pass routes.</li> <li>Receive information on activities of users.</li> <li>Identify potential projects on which AMNS and user groups could collaborate.</li> <li>Seek contributions to adaptive management planning.</li> </ul>	<ul style="list-style-type: none"> <li>EIS engagement</li> <li>Operational Engagement</li> <li>Post-closure</li> </ul>	<ul style="list-style-type: none"> <li>Invitation to yearly open houses</li> <li>Timely communication on operation concerns</li> <li>Newsletter updates providing yearly project updates in written form</li> </ul>
Other land users from outside the immediate area: <ul style="list-style-type: none"> <li>hunters</li> <li>fishers</li> <li>non-local ATVers/snowmobilers</li> <li>hikers</li> </ul>	<ul style="list-style-type: none"> <li>To reduce land use conflict.</li> <li>To improve operational safety for AMNS and recreational user.</li> </ul>	<ul style="list-style-type: none"> <li>Advise of any access changes and haul road crossing locations.</li> <li>General information on AMNS.</li> </ul>	<ul style="list-style-type: none"> <li>Information Sharing</li> <li>Key Concern Specific Engagement</li> </ul>	<ul style="list-style-type: none"> <li>Signage on roads</li> <li>Newsletter</li> <li>Email and phone line access</li> <li>Website</li> </ul>

Notes: EIS = Environmental Impact Statement; AMNS = Atlantic Mining NS Inc.; ATV = all-terrain vehicle; MACA = Mooseland and Area Community Association; CLC = Community Liaison Committee; NSSA = Nova Scotia Salmon Association; ESFWA = East Shore Forest Watch Association; PUMA = Pleasant Valley Upper Musquodoboit; ATVANS = All-Terrain Vehicle Association of Nova Scotia.

### 3.6 Commitments

Table 4 is an example of a commitment registry that can be tracked for implementation. The commitment registry will be reported on quarterly and includes in occur indices of success. Fulfilling commitments is a core value of St Barbara Limited and AMNS

**Table 4: Summary of Key Concerns Raised During Public and Stakeholder Engagement, 2015 to 2020**

Key Concerns	Summary of Proponent Response	Corresponding Updated 2021 EIS Section Reference <sup>(a)</sup>	Follow-up/ Commitment
<b>2015 to 2019 Engagement</b>			
Concern about metals leaching from waste rock pile, including arsenic, and acid rock drainage.	Leaching of metals is not expected, e.g., arsenic is expected to be within baseline conditions. PAG will be covered using an engineered cover that reduces infiltration rate and thereby limiting potential acid drainage. If necessary, water treatment will be put in place. Runoff from NAG and PAG will be monitoring during construction, operation, closure, and post closure to determine if adaptive management should be applied.	Section 6.5.4 Bedrock Geology; Section 6.7 Surface Water Quality and Quantity, including Surface Water Quality and Quantity Mitigation (Section 6.7.9) and Groundwater Mitigations (Section 6.6.8)	Monitoring, Mitigations and Adaptive Management of waste rock throughout life of mine
Concern about effect on water quantity in Cameron Flowage from pit development.	Local hydrogeological conditions ensure that groundwater will be maintained to recharge Cameron Flowage. Baseline and ongoing monitoring of surface water and groundwater levels will be in place to identify trends.	Section 6.6.7 Project Activities/Interaction with Groundwater Quality and Quantity	Implement Aquatic Effects Monitoring Program and Groundwater Monitoring Program.
Questions about contingency planning for accidents and malfunctions.	Hazards have been identified and assessed based on risk with mitigations and contingency planning in place. Future detailed planning and implementation of the Project will further address potential accidents and malfunctions.	Section 6.18 Accidents and Malfunctions	Establish Emergency Response Plan and Operational Procedures to manage planned and unplanned events.
Concern about wetlands being impacted at Beaver Dam Mine Site and future compensation.	Where possible, wetlands have been avoided; otherwise minimization of effects was incorporated into Project planning. Any wetlands altered must have NSE approval and will require compensation.	Section 6.8 Wetlands, including Wetlands Mitigation (Section 6.8.8)	Limit mine footprint and compensate for wetlands that cannot be avoided
Questions about addressing species at risk if identified in Project area.	Species of conservation interest (SOCI) and species at risk (SAR) have been assessed. Effect is minimal and where a potential Project interaction, mitigation and monitoring plans are identified for priority species, including fish, vascular flora and lichens, terrestrial fauna and birds.	Section 6.13.8 Mitigation for SOCI and SAR	Monitoring, Mitigation and Adaptive Management of SOCI and SAR
Concern about effect on habitat from Haul Road construction.	Effects of road construction will be minimized by using existing corridors where possible and improving drainage where damaged culverts	Section 2.8.2 Haul Roads for Transporting Ore, and key sections for each VC in Section 6 Environmental Effects Assessment	Limit the size of Haul to the extent possible. Replace culverts and

**Table 4: Summary of Key Concerns Raised During Public and Stakeholder Engagement, 2015 to 2020 (continued)**

Key Concerns	Summary of Proponent Response	Corresponding Updated 2021 EIS Section Reference <sup>(a)</sup>	Follow-up/Commitment
	exist. Effects and mitigation measures are specifically identified for ecological VCs, including habitat and flora.		
Concern about volumes of truck traffic in context of safety on public roadways and recreational vehicles.	Potential interaction exists with operation of the Haul Road and the public; the risk of a mobile equipment accident has been assessed as low with mitigations in place including design of Hwy 224 crossing, appropriate signage, and haul truck driver training.	Section 2.8.2 Haul Road; Section 6.16.10 Project Activities and Socio-economic Interactions and Effects; and Section 6.18.5.4 Mobile Equipment Accident	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Request to prefer Haul Road option that does not travel along Hwy 224.	Based comments received on two options during the stakeholder and Mi'kmaq engagement, AMNS completed a feasibility review of the second option which does not pass by any residences. This was selected and is carried forward in the EA.	Section 2.8.2 Haul Roads for Transporting Ore;	Re-Routing of Haul Road to avoid permanent residents and Beaver Lake I 17R
Concern on cyanide use at plant for gold processing.	The approved Touquoy Gold Project includes a gravity/CIL processing of the ore using a highly efficient cyanide destruction process. This use of this existing plant will be extended for the processing of ore from the Beaver Dam Mine Site. Mitigations for transportation, handling storage and processing will be incorporated into the extended use of the plant.	Section 2.8.3 Operations and Maintenance associated with the processing plant: Section 2.8.3 and Appendix F.10 Tailings and Water Management	Maintain Operation and Maintenance Plan for Cyanide Use
Concern on effect of tailings disposal in mined-out Touquoy pit.	Use of the approved pit as part of the Touquoy Gold Project allows the existing footprint to be used and eliminates the need to process the tailings at the Beaver Dam Mine Site. Geological conditions predict minimal effect on the receiving environment; conditions will be monitored and compared with the developing baseline data set for the Touquoy Gold Project.	Section 2.8.3 Operations and Maintenance associated with tailings management (exhausted pit), and key sections for surface water and groundwater in Section 6 Environmental Effects Assessment	Establish operational plan for deposit of tailings into the mined-out pit and ongoing monitoring of surface and groundwater water will determine if adaptive management should be applied
Request to be informed on the Project activities.	AMNS is committed to maintaining its CLC for the life of the Project. Other aspects of community engagement will continue as per Engagement Plan.	Section 3.6 Public Engagement; Section 6.16.11 Mitigation for Socio-economic Conditions	Implement Engagement Plan
<b>2020 Engagement</b>			
Concerns about access to ATV and snowmobile trails.	Restrictions on usage are required for safety reasons. Alternative access for ATVs, snowmobiles and light vehicles are being considered.	Section 6.16.5.4 Land Use, Recreational and Indigenous, Section 6.16.11 Mitigation and Appendix A.4a Summary of Public Engagement as Completed for the Beaver Dam Mine Project	Construct bypass roads to maintain access during operations

**Table 4: Summary of Key Concerns Raised During Public and Stakeholder Engagement, 2015 to 2020 (continued)**

Key Concerns	Summary of Proponent Response	Corresponding Updated 2021 EIS Section Reference <sup>(a)</sup>	Follow-up/ Commitment
Concerns about access to camps, hunting and fishing locations.	Access to camps, hunting areas and fishing areas will be maintained. Camps, hunting and fishing areas have been identified by stakeholders and AMNS will work with stakeholders to allow continued access.	Section 6.16.5.4 Land Use, Recreational and Indigenous, Section 6.16.5.5 Parks and Open Space, Tourism, Section 6.16.11 Mitigation and Appendix A.4a Summary of Public Engagement as Completed for the Beaver Dam Mine Project To-date	Construct bypass roads to maintain access during operations
Concerns about traffic through Mooseland.	Traffic is not expected to impact Mooseland. As AMNS is developing routes for ATVs, snowmobiles and light vehicles, no traffic increases are expected in Mooseland.	Section 6.16.5.4 Land Use, Recreational and Indigenous, Section 6.16.5.6 Roads and Traffic, Section 6.16.11 Mitigation and Appendix A.4a Summary of Public Engagement as Completed for the Beaver Dam Mine Project To-date	Construct bypass roads to maintain access during operations Implement engagement plan to address public concerned during life of Mine
Concerns about noise in Mooseland.	Noise modeling shows that all residences and receptors in Mooselands meet guidelines.	Section 6.1 Noise, Section 6.16.5.4 Land Use, Recreational and Indigenous, Section 6.16.11 Mitigation, Appendix A.4a Summary of Public Engagement as Completed for the Beaver Dam Mine Project To-date and Appendices B.1 Beaver Dam Mine Construction Noise Assessment and B.2 Updated Noise Impact Assessment Technical Report	Implement a Noise Complaint Protocol and Engagement Plan
Concerns about safety of the road network and trail network on Haul Road.	AMNS Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee.	Section 6.16.5.4 Land Use, Recreational and Indigenous, Section 6.16.5.6 Roads and Traffic, Section 6.16.11 Mitigation and Appendix A.4a Summary of Public Engagement as Completed for the Beaver Dam Mine Project To-date	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Questions and concerns regarding receiving communications and information during the life of the Project.	Draft Public Engagement Plan has been drafted and will be circulated to stakeholders for feedback and comment. Community relations telephone line, email, website and news releases will continue. AMNS is evaluating opportunities to include social media platforms as well.	Sections 3.2 Objectives, Section 3.4 Engagement Strategy, and Appendix A.6 draft Public Engagement Plan	Implement Engagement Plan
Identification of potential mainland moose in the area.	The information provided by a stakeholder is being reviewed as of the updated 2021 EIS.	Section 6.11.4.1.1 Mainland Moose and Appendix A.4a Summary of Public Engagement as Completed for the Beaver Dam Mine Project To-date	Implement Engagement Plan
Concerns regarding slurry and dust from the Mooseland Road related to the Touquoy operations.	AMNS has a skid steer with a broom dedicated to cleaning the crossing. AMNS commits improving visibility and removing debris at the Mooseland Road crossing.	Sections 2.11.11 The Preferred Approach	Implement Operational Procedure to Manage Haul Roads

**Table 4: Summary of Key Concerns Raised During Public and Stakeholder Engagement, 2015 to 2020 (continued)**

Key Concerns	Summary of Proponent Response	Corresponding Updated 2021 EIS Section Reference <sup>(a)</sup>	Follow-up/ Commitment
Concerns that the original EIS incorrect statements regarding the distances between residents and the Mooseland entrance to the Haul Road (known as the “old dump road”).	Updated 2012 EIS will be corrected as appropriate.	Section 2.3 Project Location and 2.5Project History, Section 6.16.4.12 Land and Resource Use, Section 6.16.5.6 Roads and Traffic	Corrected in EIS
Requested signage be placed on the “old dump road” to notify non-local residents that AMNS is considering construction of a Haul Road.	It is premature to place signage until project is approved. Also signage would require landowner approval. Business cards are being provided to local residents for them to distribute so that anyone with questions can contact community relations.	Section 6.16.5.6 Roads and Traffic, Section 6.16.10 Project Activities and Socio-economic Integrations and Effects, and Section 6.16.11 Mitigation	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Concerns that the life of the Beaver Dam project use of the Haul Road will extend beyond 5 years.	The life of mine for the Project is 5 years but Fifteen Mile Stream Gold Project and Cochrane Hill Gold Project will also use the Haul Road.	Section 1.2 Atlantic Mining NS Inc. Information and Section 8 Cumulative Effects Assessment	Implement Engagement Plan
Request to have truck and ATV access between the Mooseland Road and Hwy 224.	truck and ATV access between the Mooseland Road and Hwy 224 is accommodated via bypass roads.	Section 6.16.5.6 Roads and Traffic and Appendix A.4a	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Request to have the Mooseland Road entirely paved between Touquoy and the entrance to the Hwy 224.	The Mooseland Road is a provincially owned road and decisions regarding paving at made at the provincial level. This concern has been forwarded to the CLC to assess next steps and possibly providing letter of support for paving.	Section 6.16.5.6 Roads and Traffic and Section 6.16.8 Consideration of Engagement Results	CLC Follow-up
Questions regarding the safety monitoring of the Mooseland road.	AMNS has a close working relationship with NS Department of Transportation and Active Transportation and will work collaboratively with an ad hoc advisory committee.	Section 6.16.5.6 Roads and Traffic, Section 6.16.11 Mitigation, and Appendix A.4a	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Question regarding if the Haul Road can have blended traffic	AMNS explored this option and determined that for safety and operational reasons, that blended traffic is not the best option and instead is pursuing a dedicated bypass option for ATVs, snowmobiles and light vehicles.	Section 6.16.5.6 Roads and Traffic	Commitment to reconsider blended traffic after Beaver Dam Mine operations is completed
Request for a public meeting in Mooseland.	AMNS organized an open house for Mooseland residents on November 27 and 28, 2020. Public Health restrictions issued by the province required that this meeting be cancelled. An open house potentially	Sections 3.6 Public Engagement and Section 3.8 and Appendix A.6 Ongoing Engagement	Implement Engagement Plan

**Table 4: Summary of Key Concerns Raised During Public and Stakeholder Engagement, 2015 to 2020 (continued)**

Key Concerns	Summary of Proponent Response	Corresponding Updated 2021 EIS Section Reference <sup>(a)</sup>	Follow-up/Commitment
	will occur in Q2/Q3, determined on health restrictions due to COVID-19.		
Request for input into the operational and safety plan for the Haul Road.	AMNS will seek input in the operations and safety plan for the Haul Road. AMNS may established an ad hoc advisory committee to solicit advice.	Section 6.16.5.6 Roads and Traffic, Section 6.16.11 Mitigation, and Appendix A.4a and A.6	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Concerns about impacts on hunting near the Haul Road.	Hunting will be governed by provincial hunting requirements, which will restrict hunting near the Haul Road.	Section 6.14.7.1 Project Interactions with Traditional Use/Rights	Implement Engagement Plan
Concerns about providing access to Marilyn Prest's land.	Access will be provided to this particular landowner.	Section 6.16.5.4 Land Use, Recreational and Indigenous	Construct by-pass roads and provide landowner access
Concerns about AMNS is communicating its plan for the Haul Road to the general population outside of the immediate area.	Communication and engagement with this stakeholder will occur as per the draft Public Engagement Plan.	Appendix A.6 draft Public Engagement Plan	Implement Engagement Plan
Concerns about Impacts on Ferry Lake.	Ferry Lake is not modeled to be impacted by the Beaver Dam Mine Project. Ferry Lake property owners who have expressed interest in the project have been contacted.	Section 3.6 and Appendix F.9 (Response to IR2s. CEAA 2-36, CEAA 2-37, and NSE 2-130 Evaluation of Potential Impacts from Metals COCs to Groundwater and Surface Water from Dust Deposition along the Haul Road)	Implement Engagement Plan
Impacts on NSSA West River Project and fish habitat.	Fish and fish habitat assessment, mitigation and monitoring plans to address ongoing concerns. Develop an aquatic Effects Monitoring Program.	Section 6.9.8 Mitigation (Fish), Section 6.16.11 Mitigation (Socio-economic) and Section 8 Cumulative Effects Assessment	Implement Aquatic Effects Monitoring Program
Speeding by AMNS vehicles on the Mooseland Road.	Complaints from residents will be investigated. All AMNS vehicles include a GPS so that vehicle speeds can be tracked. AMNS committed to installing digital speed sign as a pilot project.	Section 6.16.8 Consideration of Engagement Results	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee
Concerns about the widening of the Haul Road on private landowners.	The width of the Haul Road right of way is approximately 100 m. The Haul Road and bypass road will remain within this right of way and no additional land is required for the bypass roads.	Section 2.8.2 Haul Road for Transporting Ore, Section 2.8.2 Project Activities	Implement Haul Road Operations and Safety Management Plan will be developed by an ad hoc advisory committee

Note: <sup>(a)</sup> Updated 2021 EIS (AMNS 2021).

AMNS = Atlantic Mining NS Inc.; SOCI = Species of conservation interest; SAR = species at risk; VC = valued component; Hwy = highway; EA = Environmental Assessment; CIL = carbon in leach; CLC = Citizen Liaison Committee; MRC = Moose River Consolidated; ATV = All-terrain vehicle; NSSA = Nova Scotia Salmon Association; IR2s = Round 2, Information Requests; CEAA = Canadian Environmental Assessment Agency; NSE = Nova Scotia Environment; COCs = Contaminates of Concern; m = metre; N/A = not applicable; GPS = Global Positioning System.

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## 5 ACRONYMS AND ABBREVIATIONS

AGS	Atlantic Growth Strategy
AMNS	Atlantic Mining NS Inc.
ARM	Acid Rain Mitigation Project of the West River (Sheet Harbour)
ATV	All-Terrain Vehicles
ATVANS	All-Terrain Vehicle Association of Nova Scotia
CEAA	Canadian Environmental Assessment Agency
CLC	Community Liaison Committee
EIS	Environmental Impact Statement
EP	Engagement Plan
ESFWA	Eastern Shore Forestry Water Association
IAAC	Impact Assessment Agency of Canada
KPIs	Key Performance Indicators
NSSA	Nova Scotia Salmon Association
MACA	Mooseland and Area Community Association
SEP	Stakeholder Engagement Plan
VC	Valued Component



## **Appendix 1**

# **St Barbara Limited (Atlantic Mining NS Inc.) Corporate Policies**

# CODE OF CONDUCT

Document Owner	<b>Company Secretary</b>
First Originated	23 February 2016
Previous Revision	25 February 2020
Issue Date (this revision)	8 December 2020

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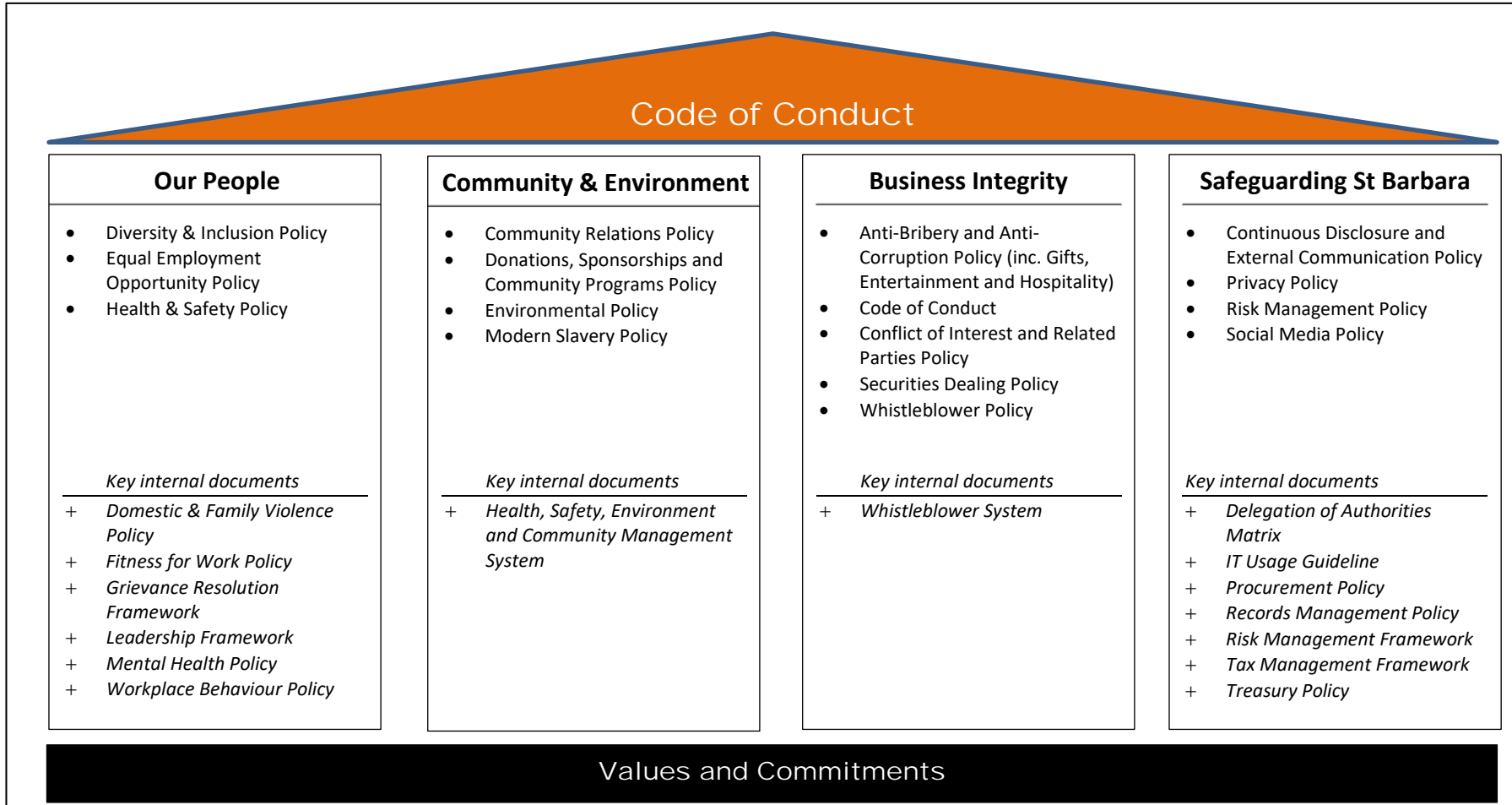
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# St Barbara Code of Conduct Framework

This Code is one component of St Barbara’s Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on [www.stbarbara.com.au](http://www.stbarbara.com.au)

○ = Document in preparation

+ = Internal document published on ROCKi

## Message from the MD & CEO

As part of the Board and Management of St Barbara, I am fully committed to maintaining high standards of ethics, integrity and statutory compliance in everything St Barbara does.

Our Code of Conduct and related policies clearly state the way we conduct ourselves with our internal and external stakeholders.

Our purpose is to create value in everything we do, for our people our communities and our shareholders.

Our vision is to be a brilliant, global mining company that grows sustainably and create enduring, positive impacts.

We will only continue to be successful with the support and trust of all our stakeholders, which includes our employees, contractors, suppliers, local communities and landowners, shareholders and governments. This support and trust is built on a continuous commitment to our values:

- We act with **honesty** and **integrity**
- We treat people with **respect**
- We value **working together**
- We **deliver to promise**
- We strive to **do better**

In addition to the values, the Company is guided by five business-wide commitments to safety, our people, our communities, the environment and to growing our business sustainably:

- Safety always
- Empowered people, diverse teams
- Stronger communities
- Respecting the environment
- Growing sustainably

These values and commitments underpin our Code of Conduct, which covers a range of different scenarios, but there is no substitute for good judgement. Good behaviour is not just about following rules and laws - we must always ask ourselves "am I doing the right thing?"

Importantly, if you see something that you don't think is right, you should speak up, either to one of your managers, or via one of the whistleblower channels described in this document. We will not tolerate any retaliation against those who speak up about any actions that do not accord with our values, Code of Conduct and policies.

Our Board and Executive Leadership team are deeply committed to upholding our values and Code of Conduct. Please take the time to read our Code of Conduct carefully and think about how our commitment to high standards of ethical business practices impacts the way you work in our business.

Craig Jetson  
**Managing Director and Chief Executive Officer**

# 1. THE COMMITMENT

The Board and Management are committed, individually and collectively as St Barbara, to complying with all legal obligations and maintaining high standards of ethics and integrity in all Company dealings.

St Barbara's Code of Conduct (**Code**) clearly states how St Barbara Limited and its subsidiaries (collectively, **St Barbara**) and **St Barbara Personnel** will conduct business with all internal and external stakeholders.

The Code is aligned with the Company's values.

- We act with **honesty** and **integrity**
- We treat people with **respect**
- We value **working together**
- We **deliver to promise**
- We strive to **do better**

In addition to the values, the Company is guided by five business-wide commitments to safety, our people, our communities, the environment and to growing our business sustainably:

- **Safety always**  
Zero harm is always our target. Zero harm to all people as we responsibly operate our assets to their full potential. This focus on safety guides everything we do.
- **Empowered people, diverse teams**  
We are an employer of choice committed to inclusion and diversity. We provide a caring work environment where our talented people are happy, thrive, feel safe and can fulfil their potential.
- **Stronger communities**  
We strive to help our communities thrive, grow and prosper. We build meaningful relationships, investing time and energy to ensure local communities are enriched by being our neighbours.
- **Respecting the environment**  
We are committed to caring for the environment. We think differently to find solutions to actively manage and neutralise our impact, because we care about the environment and our planet.
- **Growing sustainably**  
Growing our business sustainably, where it makes sense, and with strong governance practices, means we can add value for everyone: our shareholders, our people and our communities.

The key components of the Code are set out in the Code of Conduct Framework at the front of this Code. The Code is supported by more detailed policies, standards, procedures and guidelines which are referred to in the Code of Conduct Framework. Relevant public documents are available on St Barbara's website at [www.stbarbara.com.au/about-us/governance/](http://www.stbarbara.com.au/about-us/governance/) and internal documents are available on St Barbara's intranet site, ROCKi.

## 2. WHO DOES THIS CODE APPLY TO?

This Code applies to all individuals at all levels who are employed by, act for, or represent St Barbara (**St Barbara Personnel, also referred to as 'you' in this Code**) anywhere in the world. For the purposes of this Code, St Barbara Personnel includes:

- a) directors;
- b) officers;
- c) managers;
- d) employees;
- e) contractors;
- f) consultants; and
- g) any other person representing the St Barbara Group.

This Code applies to St Barbara Personnel irrespective of their employment status (that is, whether they are employed on a full-time, part-time, maximum term, casual or temporary basis).

### **3. RESPONSIBILITIES AND COMPLIANCE WITH THIS CODE**

It is your responsibility to ensure that you do not breach this Code, any applicable St Barbara policy, standard, procedure or guideline or applicable laws and regulations.

This Code and the broader Code of Conduct Framework provides guidance but it cannot address every law, rule, policy or scenario you may encounter. Nor can it be a substitute for the exercise of common sense and good judgment, or seeking guidance when needed. It is critical that we all practice open communication. Asking questions and discussing concerns or issues that arise at a practical level is essential to good understanding and compliance.

#### **3.1 Core Behaviours**

In addition to the detailed requirements set out more fully elsewhere in the policies contained in the Code of Conduct Framework, St Barbara requires that St Barbara Personnel will, at all times:

- act in the best interests of the Company;
- act honestly and with high standards of personal integrity;
- treat others with respect and courtesy and without harassment;
- remain alert to hazards to themselves and others, and not accept or ignore an unsafe task or condition;
- comply with the laws and regulations that apply to the Company and its operations;
- not knowingly participate in any illegal or unethical activity, including offering or accepting bribes and other unlawful or unethical payments or inducements;
- respect and work to uphold human rights;
- not enter into any arrangement or participate in any activity that would conflict with the Company's best interests or that would be likely to negatively affect the Company's reputation;
- not take advantage of the property or information of the Company, its trading partners or other St Barbara Personnel for personal gain or to cause detriment to the Company, its trading partners or other St Barbara Personnel;
- not take advantage of their position or the opportunities arising from their position for personal gain;
- maintain confidentiality of sensitive information;

- use Company resources in a proper manner and for proper purposes; and
- avoid or declare actual or perceived conflicts of interest.

### **3.2 Non-compliance and reporting obligations**

It is your responsibility to report to your Immediate Manager any actual or suspected breach of this Code, the Code of Conduct Framework or of any applicable laws and regulations. If you do not feel comfortable making a report to your Immediate Manager, you should contact your Manager-once-Removed, Human Resources, Company Secretary, General Counsel and Deputy Company Secretary or Whistleblower service shown below.

If an actual or suspected breach of this Code is brought to your attention, you must report it through the proper channel.

All potential violations of this Code may be regarded as misconduct and will be taken seriously and investigated. If it is substantiated that you have failed to comply with the Code or the Code of Conduct Framework, you may be subject to disciplinary action up to and including termination of employment or termination of contract.

### **3.3 Whistleblower**

If you are not comfortable with the reporting options listed above, you may report to St Barbara's Whistleblower Protection Officer, or use St Barbara's external and independent whistleblower reporting service, Your-Call. A secure report can be made (including an anonymous report) via:

Website: [www.yourcall.com.au/report](http://www.yourcall.com.au/report) (Company ID: STBM1986)

Telephone line 9:00 am to 12:00 am midnight Monday to Friday (AEST) except National Public Holidays.

Australia	1300 798 101
Canada	(800) 897 2761
PNG	00086 1281

For more information, please refer to the Whistleblower Policy.

## **4. FURTHER GUIDANCE**

If you require further guidance as to this Code, please contact your Human Resources representative, St Barbara's Company Secretary, or General Counsel and Deputy Company Secretary.

## **5. REVIEW**

This Code is to be reviewed:

- (a) as soon as practicable after a key change in the nature or scope of St Barbara's activities;  
or
- (b) otherwise at least once every two years.



ATLANTIC GOLD

## Touquoy Gold Mine Project COMPLAINT RESOLUTION PLAN

Version 1 <sup>1</sup>

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### 1.0 PURPOSE

- 1.1 This document is intended to standardize the formal response procedure to complaints from members of the public received directly by Atlantic Mining NS in association with its activities associated with the Touquoy Gold Mine Project.
- 1.2 This plan also standardizes the documentation of contact information for the individual making the complaint and the Company response(s) to address the complaint, as well as the submission of records associated with this procedure to Nova Scotia Environment (NSE).
- 1.3 The Company is committed to addressing complaints in a timely and respectful manner. This includes verbal and written complaints directed to the Company. Where complaints may address issues that appear unrelated to the Company's project activities, the individual will be notified of such.
- 1.4 Specifically, this plan includes procedures to address complaints associated with the Project:
- Receive and record all complaints and document name, title, address, telephone number and email as provided by individual;
  - Investigate the cause of complaint and undertake appropriate action, if necessary, to correct the problem;
  - Respond to complainant in a timely fashion depending on nature of investigation and corrective actions if necessary; and
  - Document any corrective actions in short or long term and responses to the complainant, including any arbitration refers, proceedings of referrals and the decisions rendered.
- 1.5 This procedure satisfies the requirements of Industrial Approval Condition 21.

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<sup>1</sup> This plan will be integrated into Atlantic Gold's Environmental Protection Plan (EPP) in 2017; at this time, this version and its associated form will be superseded.



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## **2.0 SENSITIVITY OF THE COMPLAINT**

- 2.1 The sensitivity of the complaint depends on the level of concern expressed by the member of the public lodging the complaint and the potential risk associated with the nature of the complaint.
- 2.2 Where a perceived high level of risk to health, safety or environment based on nature of complaint, the VP Projects and Manager of Environment and Community Relations shall be notified immediately by employee initially receiving the complaint. If neither available, other key employees to be notified immediately based on nature of complaint.
- 2.3 Where a perceived high level of concern expressed by member of the public lodging the complaint, the Manager of Environment and Community Relations shall be notified immediately by employee initially receiving the complaint. If not available, other key employees to be notified immediately based on nature of complaint.
- 2.4 If the employee receiving the complaint directly is in doubt of its sensitivity, the Manager of Environment and Community Relations shall be contacted or other key employees if not immediately available.

## **3.0 RECEIVING AND RECORDING COMPLAINT**

- 3.1 When a complaint is received by Atlantic Gold from a member of the public, the Company employee initially receiving the complaint shall log the name, title, address, telephone number and email address of the individual where provided.
- 3.2 The name of Company employee initially receiving complaint, form of complaint (e.g., site visit, phone call or email), and date and time of complaint shall also be logged.
- 3.3 The nature of complaint shall be described as indicated by the member of the public lodging the complaint.
- 3.4 The Company employee receiving the complaint will factually collect information. This information shall be documented on Attachment A: Record of Public Complaints and Company Response Form.
- 3.5 Where the complaint is provided in real time, the member of the public shall be referred to the Site Supervisor if present on site, or directly to the Manager of Environment and Community Relations as appropriate. Also the contact information of the Manager of Environment and Community Relations will be shared with the member of the public for the individual to contact at their convenience.

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#### **4.0 INITIAL INVESTIGATION AND INTERNAL REPORTING**

- 4.1 In a timely fashion depending on the sensitivity of the complaint, the Site Supervisor (or designate) shall investigate the cause of the complaint and undertake appropriate corrective actions, as necessary, to address the concern.
- 4.2 The Site Supervisor (or designate) shall inform the Manager of Environment and Community Relations in a written form in a timely fashion depending on the sensitivity of the complaint, but within a maximum of 24 hours from the initial complaint being lodged to the Company.
- 4.3 The observations and/or corrective actions as appropriate shall be documented within 24-hr period of complaint on Attachment A: Record of Public Complaints and Company Response Form and signed / dated by Site Supervisor (or designate).
- 4.4 Where corrective actions and/or reporting require additional documentation, this shall be appended to form as developed to document follow up on the complaint.

#### **5.0 CORRECTIVE ACTION AND EXTERNAL REPORTING**

- 5.1 The timeliness of corrective actions being completed shall depend on their nature and the sensitivity of the complaint. This shall be at the initial discretion of the Site Supervisor based on collaboration with VP Projects and / or the Manager of Environment and Community Relations.
- 5.2 In cases where the corrective actions and communications go beyond initial 24-hr period, this shall be documented by Manager of Environment and Community Relations and appended to the Attachment A: Record of Public Complaints and Company Response Form.
- 5.3 Where contact information has been provided and at the discretion of the Site Supervisor and / or the Manager of Environment and Community Relations, follow up communication to the member of the public who lodged the complaint will be completed in a timely fashion depending on the sensitivity of the complaint.
- 5.4 Where the complaint is referred to arbitration, the proceedings of any referrals and the decisions rendered shall be documented.
- 5.5 At regular Community Liaison Committee (CLC) meetings, a summary of complaints received from the public and Company responses, including corrective actions if any, shall be reported and noted in meeting notes.
- 5.6 Reporting to NSE will be completed as per IA at a minimum (i.e., quarterly reports); however, notification will be provided as appropriate depending on sensitivity of the complaint.



ATLANTIC GOLD

**Attachment A**

**Record of Public Complaints and Company Response Form (Version 1)**



## ATLANTIC GOLD

### Record of Public Complaints and Company Response Form (Version 1)

Date and Time Complaint Received: \_\_\_\_\_

Form of Complaint (e.g., site visit, phone call, email): \_\_\_\_\_

Name of Atlantic Gold employee initially receiving complaint: \_\_\_\_\_

Contact Information of Member of Public Lodging Complaint (indicate N/A if not provided):

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_ Telephone: \_\_\_\_\_

Nature of complaint as described by member of the public:

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Observations and/or corrective actions:

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Time and date of email or text to Manager Environment and Community Relations:

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To be completed by Site Supervisor (or designate):

<b>Print:</b>	
<b>Sign:</b>	
<b>Date:</b>	

Attach additional documentation on additional follow up to respond to complaint as appropriate to document resolution and communication, including any arbitration completed. **(Yes / No)**

## Community Relations Policy Statement

St Barbara operates in a range of socially diverse environments.

At St Barbara, we believe that mining can be a positive force for social and economic development for local communities. We strive to conduct our activities in a socially responsible manner and demonstrate respect for St Barbara's host societies. Through engagement, we try to maximise the positive impact of St Barbara's operations for local communities and balancing the interests of competing stakeholders.

Our approach in dealing with local communities and stakeholders is guided by the following principles:

- Positively engage and communicate in an open, timely and transparent way with all stakeholders, including Governments, local communities, employees, contractors and regulatory authorities in the countries in which St Barbara operates.
- Encourage all Personnel including employees, contractors and consultants to demonstrate respect for local communities and their cultural values, traditions and beliefs.
- Implement processes to educate employees who are dealing with local communities about cultural awareness and encourage proactive and transparent community engagement and involvement in St Barbara's operations.
- Seek to maximise the positive impact of St Barbara's operations on local economies through employment and training opportunities and supporting the development of local businesses.
- Conduct operations and interactions with local communities in a manner consistent with internationally recognised principles on security and human rights.
- Uphold the St Barbara Code of Conduct and Values and not engage in corrupt practices nor offer or accept bribes or other inducements.
- Adhere to the laws and regulations of the countries in which St Barbara operates.

**Craig Jetson**  
Managing Director & CEO

# CONTINUOUS DISCLOSURE AND EXTERNAL COMMUNICATIONS POLICY

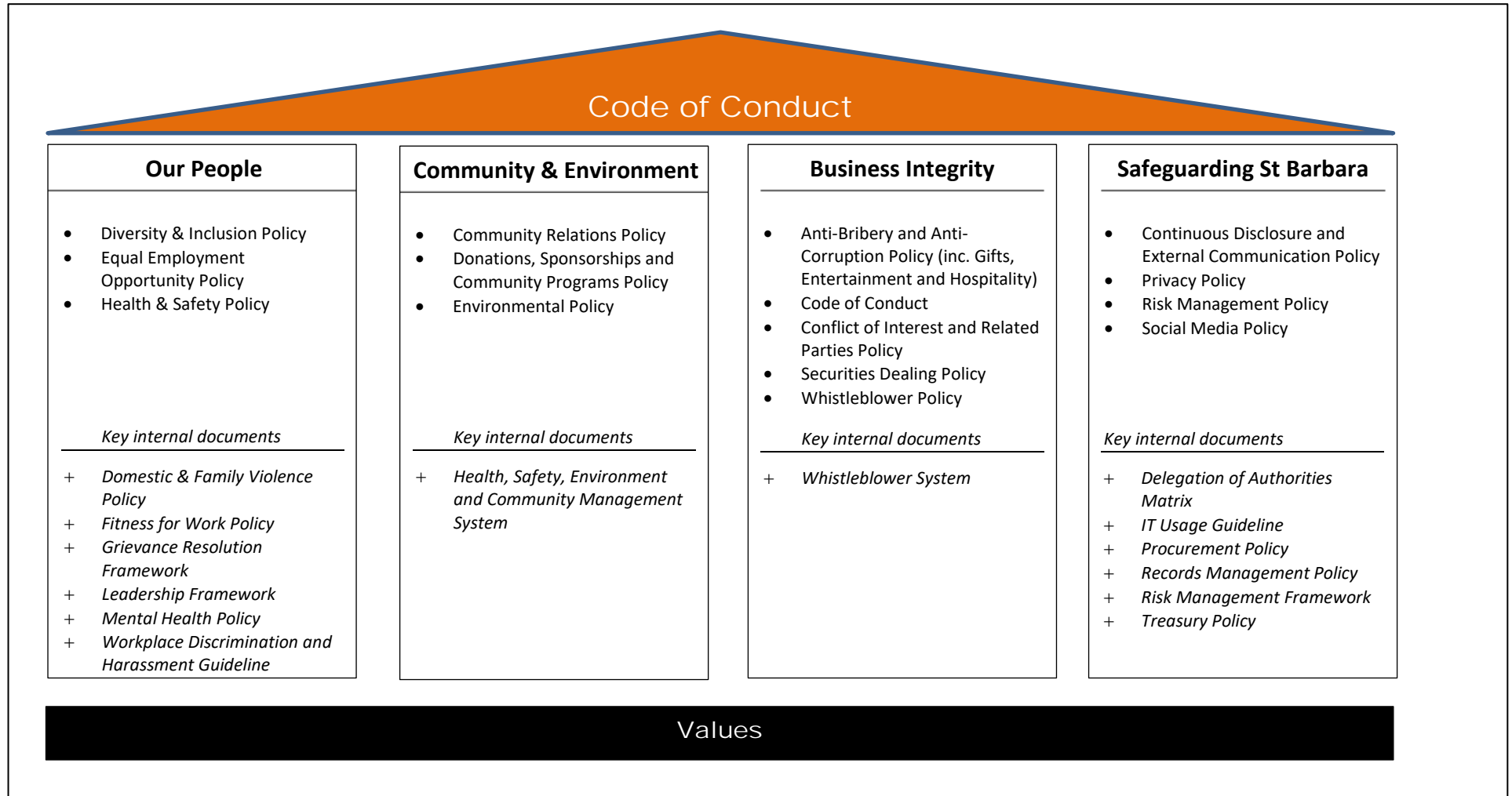
Document Owner	<b>Company Secretary</b>
First Originated	26 July 2016
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**UNCONTROLLED COPY WHEN PRINTED**

## St Barbara Code of Conduct Framework

This Code is one component of St Barbara's Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on [www.stbarbara.com.au](http://www.stbarbara.com.au)

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## 1 INTRODUCTION

This document sets out St Barbara Limited's (the **Company**) policy in relation to continuous disclosure and external communications.

The purpose of this Policy is to:

- a) ensure that St Barbara Personnel are aware of the Company's obligations to disclose information in accordance with the continuous disclosure requirements of the *Corporations Act 2001* (Cth) (**Corporations Act**) and the Australian Securities Exchange (**ASX**) Listing Rules;
- b) set out the procedures for identifying and assessing information for disclosure to ASX in accordance with the Company's continuous disclosure obligations;
- c) set out the procedures designed to ensure the Company complies with its continuous disclosure obligations; and
- d) set out the requirements for protecting confidential information of the Company from unauthorised disclosure.

## 2 WHO DOES THIS POLICY APPLY TO?

This Policy applies to all individuals at all levels who are employed by, act for, or represent St Barbara (**St Barbara Personnel**) anywhere in the world. For the purposes of this policy, St Barbara Personnel includes:

- a) directors;
- b) officers;
- c) managers;
- d) employees;
- e) contractors;
- f) consultants; and
- g) any other person representing the St Barbara Group.

This policy applies to St Barbara Personnel irrespective of their employment status (that is, whether they are employed on a full-time, part-time, maximum term, casual or temporary basis).

## 3 COMMITMENT TO CONTINUOUS DISCLOSURE

As an entity listed on the ASX, the Company is committed to:

- a) complying with the general and continuous disclosure obligations contained in the ASX Listing Rules and the Corporations Act;

- b) seeking to prevent the selective or inadvertent disclosure of material market sensitive information; and
- c) ensuring that the Company's security holders and the market are provided with full and timely information about its activities as required by the ASX Listing Rules.

## 4 DISCLOSURE OBLIGATIONS AND EXCEPTION

### 4.1 Continuous disclosure obligation

Under ASX Listing Rule 3.1, the Company must immediately notify ASX if it becomes aware of any information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's securities.

The information that must be disclosed in accordance with ASX Listing Rule 3.1 is referred to in this policy as **market sensitive** information (see section 4.2).

### 4.2 When is information market sensitive?

Information is market sensitive if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to buy or sell the Company's securities.

This is an objective test. As a guide, ASX suggests that when determining whether information is market sensitive, it might be helpful to ask the following two questions:

*"Would this information influence my decision to buy or sell the Company's securities at their current market price?"*

*"Would I feel exposed to an action for insider trading if I were to buy or sell the Company's securities at their current market price, knowing this information had not been disclosed to the market?"*

Whether or not the Company is aware of information that is market sensitive is to be determined in accordance with this policy.

### 4.3 Examples of information to be disclosed

It is not possible to exhaustively list the information which the Company must disclose. Some examples of information which may require disclosure include:

- a) the fact that the Company's production or earnings will be materially different from market expectations;
- b) significant exploration discoveries;
- c) new or material changes to mineral resource or ore reserve estimates;
- d) major safety or environmental incidents significantly impacting on the business;
- e) government decisions or proposed decisions that relate to issues significantly impacting on the business;

- f) a transaction that will lead to a significant change in the nature and scale of the Company's activities;
- g) a material acquisition or disposal;
- h) the entry into, variation or termination of a material agreement;
- i) becoming a plaintiff or defendant in a material law suit;
- j) the occurrence of an event of default under, or other event entitling a financier to terminate, a material financing facility;
- k) under subscriptions or over subscriptions to an issue of securities;
- l) giving or receiving a notice of intention to make a takeover; and
- m) any rating applied by a rating agency to the Company or its securities and any change to such a rating.

Whether disclosure of these matters is required will need to be assessed having regard to the circumstances prevailing at the time.

#### **4.4 When is disclosure of market sensitive information required?**

If information is market sensitive, and the exception from immediate disclosure does not apply (see section 4.5 below), then the information must be **immediately** disclosed to ASX.

ASX interprets "*immediately*" to mean "*promptly and without delay*" (rather than "*instantaneously*"). The ASX recognises, however, that the speed with which a notice can be given under ASX Listing Rule 3.1 will vary depending on the circumstances.

#### **4.5 Exception to continuous disclosure obligation**

The Company does not need to disclose market sensitive information while **each** of the following requirements is satisfied in relation to that particular information (ASX Listing Rule 3.1A):

- a) one or more of the following applies:
  - i. it would be a breach of a law to disclose the information;
  - ii. the information concerns an incomplete proposal or negotiation;
  - iii. the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
  - iv. the information is generated for internal management purposes of the Company; or
  - v. the information is a trade secret; AND
- b) the information is confidential and ASX has not formed the view that the information has ceased to be confidential; AND
- c) a reasonable person would not expect the information to be disclosed.

#### 4.6 Use of Trading Halts or Voluntary Suspensions

In some circumstances it may be necessary to request a trading halt or voluntary suspension to maintain fair, orderly and informed trading in the Company's securities and to manage disclosure issues. A trading halt or voluntary suspension can allow the Company a period of time to prepare and release an announcement to ASX in a timely manner while ensuring trading on ASX is not occurring in an uninformed manner.

#### 4.7 False market obligation

If ASX considers that there is or is likely to be a false market in the Company's securities and asks the Company to give ASX information to correct or prevent a false market, the Company must give ASX the information needed to correct or prevent the false market (ASX Listing Rule 3.1B). This obligation to give information to ASX arises even if the exception outlined in section 4.5 applies.

## 5 CONTRAVENTION OF OBLIGATIONS

The ASX Listing Rules are the prime source of regulation in respect of the Company's continuous disclosure obligations. ASX can suspend trading of the Company's securities and request an announcement to be made if it believes the Company is in possession of information which should be disclosed to the market.

In addition, the Corporations Act contains provisions which give legislative effect to ASX Listing Rule 3.1 such that a failure to comply with continuous disclosure obligations can amount to a breach of the Corporations Act. A breach of the relevant provision of the Corporations Act is both a criminal offence and a civil penalty provision and the Company and its officers involved may incur liability as a result.

There is further potential civil and criminal liability for the Company and its officers under the Corporations Act if the disclosure is misleading or deceptive. All St Barbara Personnel should bear in mind that the Company's auditors have an obligation to notify the regulators where they have identified a significant contravention or suspected contraventions.

A contravention by the Company of its continuous disclosure obligations or a failure by a Company employee to comply with this policy may also:

- a) result in unfavourable publicity for the Company;
- b) damage the Company's reputation in the investment community; and/or
- c) undermine confidence in the market for the Company's securities.

## 6 DISCLOSURE RESPONSIBILITIES AND PROCEDURES

### 6.1 Disclosure Officers

The Board has appointed the Managing Director & CEO, Chief Financial Officer and the Company Secretary as the disclosure officers (**Disclosure Officers**).

The Disclosure Officers are responsible for administering this policy and, in particular:

- a) overseeing and coordinating all communication with ASX, investors, analysts, brokers, shareholder associations, the media and the public;
- b) overseeing and coordinating the disclosure training and education of all the Company employees to ensure that they understand the Company's disclosure obligations and what information may be market sensitive; and
- c) collecting and recording all potential market sensitive information concerning the Company and making auditable disclosure decisions, subject to the approval requirements set out in 6.4 and 6.5.

The Disclosure Officers may delegate aspects of administering this policy to other Company employees. The delegation may be general or specific to a particular matter.

In the absence of one or more Disclosure Officers, the remaining Disclosure Officer/s will be responsible for administering this policy as set out above.

## **6.2 Reporting processes — Obligations on St Barbara Personnel**

The Disclosure Officers are responsible for ensuring that all Board decisions that must be disclosed are dealt with by an appropriate company announcement.

All St Barbara Personnel must immediately notify a Disclosure Officer if they are in possession of potentially market sensitive information or are aware of any matter they consider to be material for continuous disclosure purposes.

It is not up to St Barbara Personnel to determine whether or not an event is market sensitive. St Barbara Personnel must, and will be directed to, disclose all potentially significant information concerning the Company whether or not the St Barbara Personnel believes that:

- a) it is a material event or agreement; or
- b) an exception to disclosure applies.

## **6.3 Assessment of information by Disclosure Officers**

The Disclosure Officers must decide whether any information of which the Company is or becomes aware must be disclosed to ASX by assessing whether the information meets the market sensitive test in section 4.1 or whether it need not be disclosed due to the exception in section 4.5.

## **6.4 Approval for disclosure to ASX**

The Disclosure Officers will assess whether any information is required to be disclosed to the ASX, and the necessary timing of any such release.

Where disclosure is required, the Disclosure Officers will coordinate the actual form of disclosure and verify the accuracy of the information contained within it.

Depending on the circumstances regarding the perceived timing and sensitivity of content of any proposed announcement, the Disclosure Officers will consult where necessary with the

Chairman of the Board and/or the Directors available at that time. Where time allows, the standard practice is to circulate as a courtesy all market-sensitive ASX announcements to Directors prior to release, to allow Directors who are available at the time an opportunity to comment.

Where possible every announcement will be approved by the MD & CEO or their delegate.

Notwithstanding the above, should any or all the Disclosure Officers consider circumstances require disclosure of information to the ASX, each has the authority to approve disclosure of information to ASX.

#### **6.5 Board review of continuous disclosure matters**

As a standing agenda item at each Board meeting, the Directors will raise and consider whether there is any information (including any matters reported to or discussed at the Board meeting) that may potentially need to be disclosed to the market pursuant to the Company's continuous disclosure obligation.

Each Board meeting will contain a section dealing with continuous disclosure issues.

#### **6.6 Request for information by ASX — False market**

If ASX asks the Company for information to correct or prevent a false market, the Disclosure Officers must consider the request and seek approval for any disclosures in accordance with section 6.4 above.

#### **6.7 Requests for Trading Halts and Voluntary Suspension**

Only the Disclosure Officers are authorised to request a trading halt from ASX.

Before requesting a trading halt or voluntary suspension, the Disclosure Officers must seek approval to do so from the Board or the Chairman (or the Chairman of the Audit & Risk Committee). However, it is recognised that the Company may be required to submit a trading halt or voluntary suspension expeditiously and that it may be not always be practicable for the approval of the Board to be sought (depending upon the circumstances).

#### **6.8 Disclosure to ASX and dissemination**

When disclosure of information has been approved, the Company Secretary must immediately lodge that information with ASX in the manner prescribed by the ASX Listing Rules.

Under the Corporations Act and ASX Listing Rules, information lodged with ASX must not be released publicly by the Company until the Company has received formal confirmation from ASX that the information has been released.

Once the Company has received formal confirmation from ASX, the Company Secretary must promptly post the information on the Company's website. The Company may simultaneously or subsequently release the information in any other manner it considers appropriate including emailing details to the Company's security holders who have subscribed to the email notification service.

## **7 EXTERNAL COMMUNICATIONS**

### **7.1 Authorised spokespersons generally**

Information concerning the Company may only be disclosed to external parties by authorised spokespersons appointed in accordance with this policy. In this regard the Managing Director & CEO (or a Company employee authorised by him or her to deal with a specific enquiry) is the authorised spokesperson for disclosing information concerning the Company to the media.

### **7.2 No comments by employees or associated parties**

No St Barbara Personnel or associated party (such as a consultant, adviser, lawyer, accountant, auditor or investment banker) is permitted to comment publicly on matters confidential to the Company. Any information which is not public must be treated by all St Barbara Personnel and associated parties as confidential and must not be disclosed by any of them except through the Company's reporting system or the procedures set out in this policy. St Barbara Personnel are also required to comply with the Company's Social Media Policy when using social media for business or personal use.

### **7.3 Market speculation and rumour**

Except in the circumstances where an announcement to ASX may be required, the Company generally does not respond to media comment (including social media) or market speculation. This policy must be strictly adhered to by all St Barbara Personnel, however the Disclosure Officers may provide a response in order to correct speculation if it contains factual errors that could materially affect the Company. The Company must issue an ASX announcement:

- a) in order to prevent creation of a false market; or
- b) where it believes, or ASX notifies it that, the market sensitive information is no longer confidential.

### **7.4 No embargo of information**

Disclosure Officers, authorised spokespersons and St Barbara Personnel (including Directors) must not disclose under an embargo arrangement information concerning the Company that is required to be disclosed in accordance with this policy.

### **7.5 Dealings with media, presenting at conferences and participation in chat rooms and unauthorised disclosure of company information**

Only certain individuals are authorised to speak to the media or other outside parties.

All planned conference presentations must first be approved by one of the Disclosure Officers.

If any employee receives a request for comment from an external investor, analyst or the media in relation to any matter concerning the Company they must advise that person that they are not authorised to speak on behalf of the Company and must refer the enquiries to the Managing Director & CEO, the Company Secretary or another Company employee authorised by the Managing Director & CEO to deal with that enquiry.

Unauthorised disclosure of company information including by way of:

- a) interviews or presentations (eg at an industry, professional or private conference);  
or
- b) preparation and/or provision of written material, including emails and participation in chat room discussions,

may place the Company in contravention of its legal requirement to disclose market sensitive information first to ASX. This could result in the immediate termination of employment of the provider of the information in the case of an employee or immediate termination of contract in the case of a consultant or contractor.

The Company must not release the information that is for release to the market to any person (eg analysts, institutional investors, customers, suppliers or the media) until it has given the information to ASX and has received an acknowledgment that ASX has released the information to the market.

#### **7.6 No interviews of briefings during share-trading blackout periods.**

No employee may give an interview, make a presentation or otherwise externally release information during share-trading blackout periods (described in the Securities Dealing Policy), except with explicit permission of a Disclosure Officer, who will review the sensitivity of any information to be released.

#### **7.7 Inadvertent Disclosure**

If an inadvertent disclosure by an authorised spokesperson or other person occurs, a Disclosure Officer must be notified immediately. If the disclosed information is market sensitive, it must be released to ASX and then posted on the Company's website. If the information is not market sensitive it may nevertheless be preferable to post it on the Company's website in order to ensure the information is readily available to security holders.

The fact that market sensitive information released other than through ASX may become generally available is not an excuse for failing to disclose it to ASX.

The Company Secretary in consultation with the Chief Financial Officer and Managing Director & CEO will review comments made at analyst and investor presentations after they have concluded to ensure that there was no inadvertent disclosure of price sensitive information, or if information was disclosed that an announcement is made to the market in accordance with this policy.

## **8 ELECTRONIC COMMUNICATIONS**

### **8.1 The Company's website**

The Company's website will feature a disclosure section to ensure that all market participants have an equal opportunity to receive externally available information issued by the Company. This information will include:

- a) annual reports;



- b) results announcements;
- c) all other announcements of the Company made to ASX (whether under the Company's continuous disclosure obligations or not);
- d) materials issued and presented at investor and analyst briefings and meetings;
- e) the Company's profile and contact details.

## **8.2 ASX released information**

Consistent with section 6.8, information lodged with ASX under the Company's general and continuous disclosure obligations will not be posted on the Company's website or distributed in any manner until the Company has received formal confirmation from ASX that the information has been released to the market.

# **9 POLICY APPROVAL AND COMPLIANCE**

## **9.1 Board approval of policy**

This policy has been approved by the Board. Any amendments to this policy can only be made with the Board's prior approval.

## **9.2 Continuous disclosure on Board agendas**

The Board will ensure that continuous disclosure is a standing item on Board agendas and will:

- a) note all information disclosed since the last Board meeting; and
- b) consider whether disclosure is required for any item on the Board agenda.

## **9.3 Monitoring compliance with policy**

The Board will monitor compliance with this policy and will regularly, either through Board meetings or through any disclosure committee formed by the Board:

- a) discuss with the Disclosure Officers the effectiveness and auditability of the Company's reporting system; and
- b) consider whether the Company is complying with its obligations under this policy, the ASX Listing Rules and the Corporations Act.

## **9.4 Training and awareness**

Management must ensure that all St Barbara Personnel receive appropriate training on the Policy obligations that apply to them and understand their delegations, responsibilities and any specific business expectations.

In particular, management must ensure that, on the commencement of employment, any new employee who is a direct report to the Managing Director & CEO or who otherwise will have a direct responsibility to ensure compliance by the Company with its continuous disclosure

obligations must receive appropriate training on the policy obligations that apply to them and understand their delegations, responsibilities and any specific business expectations.

## 10 POLICY BREACHES

Strict compliance with this policy is mandatory for all St Barbara Personnel.

A contravention by the Company of its continuous disclosure obligations may result in:

- a) civil or criminal liability for the Company and persons involved in the contravention; and
- b) unfavourable publicity for the Company and may damage the Company's reputation in the investment community and undermine confidence in the market for the Company's securities.

Breaches of this policy will be taken very seriously by the Company and may lead to disciplinary action up to and including termination of employment for employees, or termination of contract for contractors or consultants.

## 11 FURTHER GUIDANCE

If any person has any queries about their reporting requirements, the Company continuous disclosure obligations or any other question about this policy, they should contact the Company Secretary in the first instance.

## 12 REVIEW

This policy is to be reviewed:

- a) as soon as practicable after a key change in the nature or scope of St Barbara's activities or the relevant Corporations Act or ASX requirements; or
- b) otherwise at least once every two years.

# DONATIONS, SPONSORSHIPS AND COMMUNITY PROGRAMS POLICY

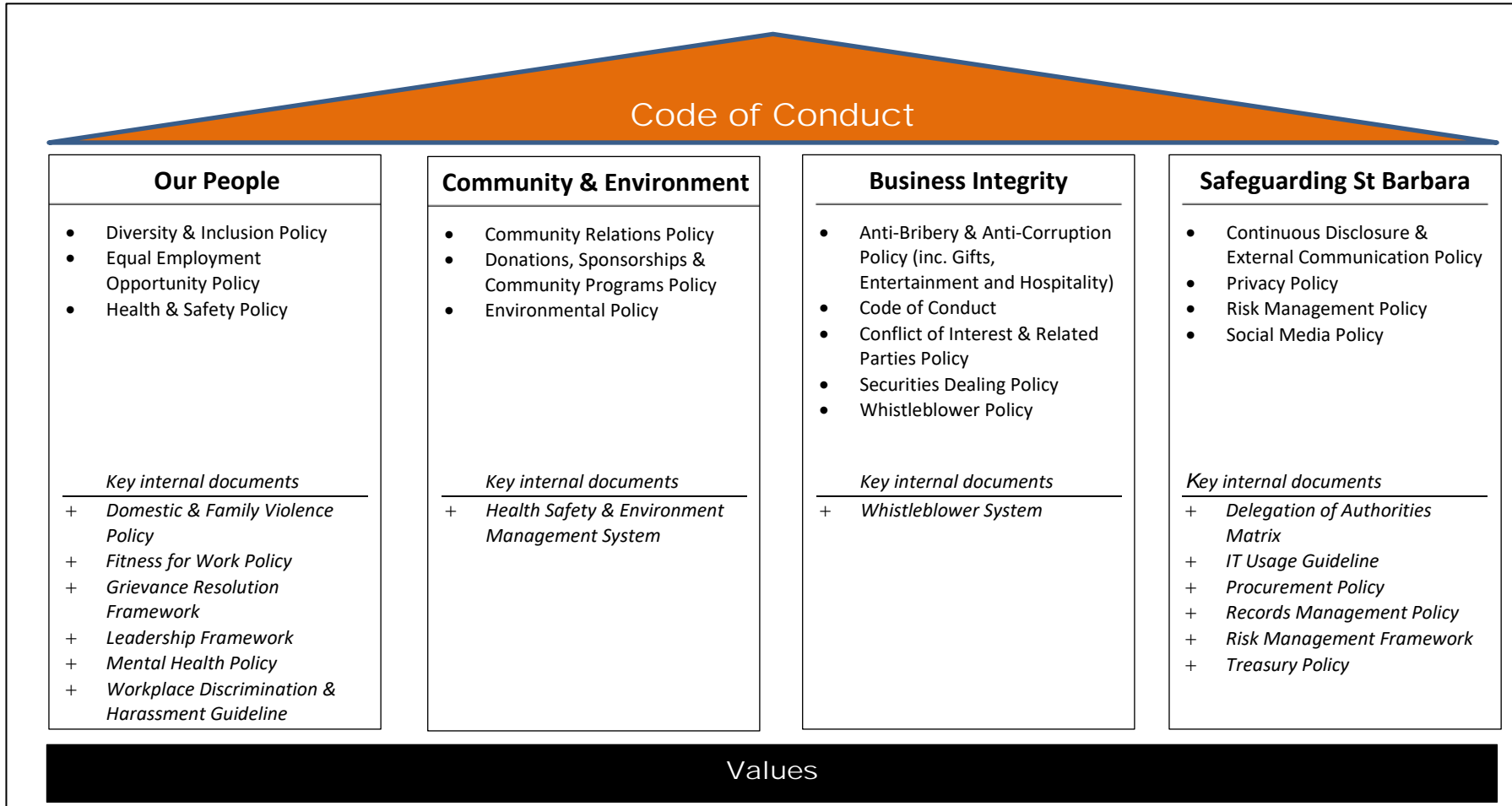
Document Owner	Company Secretary
Authorised by	Managing Director & Chief Executive Officer
First Originated	24 March 2016
Previous Revision	19 February 2019
Issue Date (this revision)	10 December 2019

UNCONTROLLED COPY WHEN PRINTED

# St Barbara Code of Conduct Framework

This Code is one component of St Barbara’s Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on www.stbarbara.com.au

○ = Document in preparation

+ = Internal document published on ROCKi

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## 1. PURPOSE

St Barbara is committed to making a strong and positive contribution to the communities in which it operates to improve educational, infrastructure, health and governance capabilities whilst acting honestly, fairly, ethically, and in accordance with applicable laws.

St Barbara's aim is to make a positive, meaningful and sustainable difference to those communities in a fair, transparent and ethical manner and to build strong relationships based on respect, trust and transparency. This is achieved through several means, including through Community Programs, Scholarships, Charitable Donations, and Sponsorships.

St Barbara does not make Political Donations. It does, however, respect the right of St Barbara Personnel to make personal charitable and political donations of their own volition.

All St Barbara community outreach and engagement programs, including sponsorships, scholarships or contributions to education, training, infrastructure, health or governance must be administered in accordance with transparent, clear and objective guidelines and procedures (including accurate and complete record-keeping and periodic audit) as set out in company policies including this Policy and Anti-Bribery and Anti-Corruption Policy.

## 2. SCOPE

This Policy applies to all individuals at all levels who are employed by, act for, or represent St Barbara or any of its subsidiaries anywhere in the world (**St Barbara Personnel**), including:

- a) directors;
- b) officers;
- c) managers;
- d) employees;
- e) contractors;
- f) consultants; and
- g) any other person in any other capacity representing St Barbara.

This Policy applies to St Barbara Personnel irrespective of whether they are employed on a full-time, part-time, maximum term, casual or temporary basis.

In this Policy, a reference to St Barbara should be read to include any person who is engaged in any capacity by St Barbara or any of its subsidiaries.

## 3. WHAT ARE DONATIONS, SPONSORSHIPS AND COMMUNITY PROGRAMS?

**Charitable Donations** are contributions to appropriate, registered or verified charitable organisations, non-profit organisations, or private foundations, made without expectation or acceptance of any benefit, favourable action or exercise of influence. It includes both monetary contributions and in-kind donations (giving food, goods and services).

**Community Programs** are initiatives by St Barbara which are designed to help improve the quality of life of the people in the communities in which it operates. These programs include delivering

education and health programs to local communities, providing sustainable business opportunities to indigenous or local landowner groups, programs to enhance governance capabilities within community organisations and education scholarships.

**Political Donations** include contributions or in kind donations to political parties, politicians, elected officials or candidates for public office in any country. St Barbara does not make any Political Donations.

**Sponsorships** are contributions to community organisations, programs or sometimes individuals, but which differ from Charitable Donations in that, in addition to providing a benefit to the organisation, event or activity being sponsored, they are also aimed at obtaining some marketing or profile raising benefit for St Barbara. Examples include sponsoring a local sporting team, community festival or artistic/musical program. The sponsorship can be in the form of cash sponsorship, or in-kind sponsorship where St Barbara gives food, goods or services to the organisation, event or activity being sponsored.

Sponsorships involving provision of scholarships, school fees, training fees, or training programs and the like are generally considered to be part of St Barbara’s Community Programs (see below). Scholarship programs are governed by the Scholarships Program and Tabar Islands Community Scholarships Guideline.

**4. CHARITABLE DONATIONS AND SPONSORSHIPS**

St Barbara may, from time to time, decide to make a Charitable Donation or provide a Sponsorship. Both require advance approval. The process for seeking approval for St Barbara to make a Charitable Donation or Sponsorship is as follows:

Donation Value (per annum) <sup>1</sup>	Who can approve?	Requirements
In-kind and cash sponsorship - up to AUD 5,000 CAD 5,000 PGK 10,000 per item, AUD 20,000 CAD 20,000 PGK 40,000 per annum within approved budget	Site General Managers and GM HR & HSEC, ELT members, reviewed by Manager Legal or Co Sec	<ul style="list-style-type: none"> <li>written request for approval setting out the purpose of the organisation/charity and details regarding due diligence on charitable/not-for-profit status and any association with public officials (as defined in Anti-Bribery and Anti-Corruption Policy), stakeholders, or related parties (as defined in Conflicts of Interest and Related Parties Policy);</li> <li>written authorisation from a person who is authorised to give approval for a donation or sponsorship of that size;</li> </ul>
Up to AUD 25,000 CAD 25,000 PGK 50,000	Managing Director & CEO (via Executive Leadership Team)	<ul style="list-style-type: none"> <li>compliant receipt for tax purposes; and</li> <li>accurate recording in business records of St Barbara</li> </ul>

<sup>1</sup> For expediency, foreign exchange equivalents set at AUD 1 = CAD 1 and AUD 1 = PGK 2 at time of reviewing policy, when actual exchange rates were AUD 1.00= CAD 0.90; AUD 1.00 = PGK 2.30, www.rba.gov.au

Donation Value (per annum) <sup>1</sup>	Who can approve?	Requirements
Over AUD 25,000 CAD 25,000 PGK 50,000	St Barbara Board	

Donation value in the above table will be calculated cumulatively in any 12 month period. This means that any donations to the same entity or related entities in the preceding 12 months must be taken into account when calculating the donation value for these purposes. An exception to this is authority to renew an otherwise compliant annual sponsorship or donation for a subsequent year within a strict 12 month period.

St Barbara will only make donations to eligible non-profit organisations whose goals and values are not inconsistent with St Barbara's Values and for which a tax deduction is allowable under the taxation laws applicable in the relevant jurisdiction.

St Barbara will not make charitable donations to:

- individuals;
- commercial or for-profit entities; or
- political parties, politicians, holders of public office or political candidates.

St Barbara will not give charitable donations in cash or to accounts not clearly affiliated with the approved charitable organisation.

## 5. POLITICAL DONATIONS

St Barbara does not make political donations. Political Donations include contributions to political parties, politicians, elected officials or candidates for public office in any country.

Whilst it is not possible to provide an exhaustive list of things which may constitute Political Donations or support, examples include, but are not limited to:

- sponsorship or hosting of functions or events organised by or associated with a political party, politician, elected official or candidate with the purpose of raising funds, campaigning, launching policies or otherwise building the profile of the party or individual;
- free or discounted use of St Barbara's premises, equipment or resources as an in-kind donation to a political party, politician, elected official or candidate;
- paying wages or salaries of a St Barbara employee who is working for a political party, politician or candidate during normal working hours (this does not include paid leave taken by the employee to undertake this work);
- using one's position at St Barbara to try to influence another company, organisation or person to make a political contribution or to provide any other form of support for a political party, politician, elected official or candidate; or
- charitable donations or contributions to organisations known to be affiliated with a political party, politician, elected official or candidate for public office or a close relative of the same.



St Barbara recognises the rights of St Barbara Personnel to participate as individuals in the political process *in their individual capacity*.

St Barbara Personnel may participate, in their individual capacity, in political processes provided it is understood, and made clear, that in doing so they are not representing St Barbara. In the event St Barbara personnel seek to run for public office, he/she may be required to take leave and should discuss it with their Immediate Manager in advance.

There may be circumstances in which St Barbara Personnel are invited to attend an event or activity organised by a political party, politician, elected official or candidate as a representative of St Barbara for the purpose of a business briefing. Prior to accepting any such invitations, approval must be obtained from your Immediate Manager. Approval will only be granted on the following conditions:

- approval is sought prior to the event;
- the attendance is for business briefing purposes only; and
- the attendance is in compliance with St Barbara Anti-Bribery and Anti-Corruption Policy and this Policy.

**6. APPROVAL OF INVESTMENT IN COMMUNITY PROGRAMS**

No investment in a community program may be made without advance, formal approval of the investment. The approval required and process for seeking approval for St Barbara to invest in a community program is as follows:

Value of investment	Who can approve?	Material to be provided to person authorised to approve/Board
Up to AUD 10,000 CAD 10,000 PGK 20,000	Managing Director & CEO	<ul style="list-style-type: none"> <li>• documented objectives that are clearly linked to the achievement of long-term and sustainable community development;</li> <li>• documented consideration of how the proposed community program is aligned with and may add value, complement or fill gaps in the community or region’s development plans;</li> <li>• documentation setting out how the community program will enhance St Barbara’s operations, community relationships or other relevant outcomes;</li> <li>• documented key performance indicators (KPIs);</li> <li>• an evaluation plan to periodically assess the KPIs including accountabilities and a schedule;</li> <li>• detailed budget; and</li> <li>• documented outcome of the due diligence (see below).</li> </ul>
AUD 10,001-50,000 CAD 10,001-50,000 PGK 20,001-100,000	The Managing Director & CEO together with the Manager, Legal	
Over AUD 50,000 CAD 50,000 PGK 100,000	St Barbara Board	

Any previous investment in the same or an affiliated community program must be taken into account when calculating the investment value.

St Barbara will only invest in community programs where the goals are not inconsistent with St Barbara's values.

### **6.1 Due Diligence for Investment in Community Programs**

Prior to seeking approval, appropriate due diligence must be conducted and documented. This includes due diligence in relation to any third party that it is proposed will be engaged to implement a program, to ensure, amongst other things, that the entity is reputable, compliant with St Barbara's policies, and has appropriate governance processes. Refer to the Due Diligence Checklist and Procurement Contract Template Clauses for more information.

### **6.2 Stakeholder Consultation**

Through consultation, St Barbara seeks to understand and consider the concerns, interests and relationships of all relevant stakeholders when considering any potential community programs. The concerns of all stakeholders must be identified and considered and, where appropriate, addressed and ensure that sufficient information is provided to the Managing Director & CEO and Board prior to seeking approval for a community program.

If there are significant stakeholder issues, the Managing Director & CEO or the Board may require a program management plan to be implemented and maintained.

### **6.3 Respect for Communities in which St Barbara operates**

St Barbara respects the communities in which it operates and delivers its community programs. In developing and implementing community programs St Barbara strives to:

- a) respect the cultures, values and customs of the communities in which we operate and seek to ensure that any community programs do not conflict with these, our policies and the law;
- b) ensure that our community programs do not intentionally favour parts of the community belonging to one religious, ethnic or political group on the basis of that membership;
- c) seek broad community support prior to implementing a community program;
- d) be open and transparent in our dealings with the community;
- e) respect the human rights of the individuals in the communities in which we operate and those who are affected by our community programs;
- f) ensure that community programs do not intentionally seek to, and are not likely to, destabilise any level of government; and
- g) ensure that our community programs are sustainable and delivered in a manner that has minimal or no adverse environmental impact.

## **7. RECORD KEEPING**

All approved Charitable Donations and Sponsorships, irrespective of value, must be recorded in the Donations, Sponsorships and Community Investments Program register located in ROCKi.

All community investment valued at more than AUD 100 / CAD 100 / PGK 200, or cumulative /repeated investment valued at more than AUD 1,000 / CAD 1,000 / PGK 2,000 in any 12 month period must be recorded in the Charitable Donations, Sponsorships and Community Investments Program register located in ROCKi.

Cumulative value may include repeated investment in the same program or ongoing support of the same type to multiple recipients over a twelve month period. Examples may include educational sponsorship payments made periodically over a twelve month window, support for local landowners' communities in the form of supply of fuel, meals or other benefits.

## **8. BRIBERY AND CORRUPTION**

St Barbara Personnel need to be aware that in some circumstances, Community Programs, Charitable or Political Donations and Sponsorships may be or be perceived to be bribery or corruption. For example, when a donation is made to a charitable organisation which is a sham or front for, or is affiliated in some way with, a third party the company may wish to influence.

St Barbara has zero tolerance for bribery or corruption in its business. Honesty, fairness and integrity are core St Barbara Values, and are integral to St Barbara's conduct of business. Conduct associated with bribery, corruption and dishonesty is inconsistent with these values and against the law. Violating these laws is a serious criminal offence which can result in significant civil and criminal penalties for both St Barbara and St Barbara Personnel individually, including substantial fines, imprisonment and reputational damage.

If you have any concerns regarding actual or potential corruption or bribery, you should immediately report them to your Immediate Manager, the Company Secretary, Manager Legal or St Barbara's external Whistleblower provider, Your-Call. For more information, please refer to St Barbara's Anti-Bribery and Anti-Corruption Policy and the Whistleblower Policy.

## **9. CONSEQUENCES FOR BREACHING THIS POLICY**

It is the responsibility of all St Barbara Personnel to ensure that they do not breach this Policy or applicable laws and regulations and to report to their Immediate Manager any actual or suspected such breach.

Depending on the circumstances, consequences may include:

- disciplinary action, the nature which action will depend on the severity of the breach, but which may include a reprimand, formal warning, demotion, and/or termination of employment in the case of employees, or termination of contract in the case of contractors, consultants or other agents;
- referral of the matter to regulatory and law enforcement authorities; and/or
- criminal and civil penalties or fines, criminal convictions and imprisonment.

In many countries bribery and many other forms of corruption are crimes, which can have very serious consequences for St Barbara and individuals involved in the conduct. Additional business consequences for St Barbara can also be very serious, and include potential liabilities, loss of business, damage to relationships, and other such outcomes.

## **10. FURTHER GUIDANCE**

Not all situations which may arise in the conduct of business can be directly addressed in a policy. St Barbara Personnel should apply their own reason, propriety and judgement to a situation based on the principles set out in this Policy.

If you require further guidance as to this Policy, please promptly contact the Company Secretary or Manager Legal. St Barbara encourages St Barbara Personnel to ask questions and raise matters which may be of concern. Open communication and discussion about issues of concern is the best way to ensure appropriate compliance with law and business ethics.

## **11. REVIEW**

This Policy is to be reviewed:

- (a) as soon as practicable after a key change in the nature or scope of St Barbara's activities or a change in legislation relating to bribery and corruption; or
- (b) otherwise at least once every three years.

## **APPENDIX**

Delegation of Authorities Matrix: Donations, Sponsorships and Community Programs (copy)

## Delegation of Authorities Matrix (cont.)

### Addendum for Gifts and Hospitality, Donations, Sponsorships and Community Programs

(Refer to Anti-Bribery Anti-Corruption Policy and Donations, Sponsorships and Community Programs Policy for more information)

Transaction	Board	MD & CEO	Level 5	Level 4	Level 3	Level 2
<b>Charitable Donations &amp; Sponsorships</b>						
<i>NB: record all approved sponsorships and donations in Donations, Sponsorships and Community Investments Program Register</i>						
Aggregate donations for 12 month period	At Board discretion	Approve – Up to AUD 25,000 CAD 25,000 PGK 50,000	Reviewed by Manager Legal or Co Sec up to AUD 5,000 CAD 5,000 PGK 10,000 per item,  AUD 20,000 CAD 20,000 PGK 40,000 per annum within approved budget	Site General Managers and GM HR & HSEC, reviewed by Manager Legal or Co Sec up to AUD 5,000 CAD 5,000 PGK 10,000 per item,  AUD 20,000 CAD 20,000 PGK 40,000 per annum within approved budget	Nil	Nil
<b>Political Donations</b>						
All political donations are prohibited – refer to Section 9 Anti-Bribery Anti-Corruption Policy and Section 5 of the Donations, Sponsorships and Community Programs Policy						

<b>Community Programs</b>						
<i>NB: record all community programs above AUD 100 / CAD 100 / PGK 200 in Donations, Sponsorships and Community Investments Program Register</i>						
Aggregate support (cash, goods, services) for 12 month period	At Board discretion	Approve alone – up to AUD 10,000 CAD 10,000 PGK 20,000  Approve together with Manager Legal up to AUD 50,000 CAD 50,000 PGK 100,000	Nil	Nil	Nil	Nil
<b>Gifts, entertainment, hospitality (given and received)</b>						
<i>NB: record all Gifts, entertainment, hospitality in Gifts Register</i>						
Record all gifts/hospitality given to/received from: <ul style="list-style-type: none"> <li>Public official valued at AUD 10 / CAD 10 / PGK 20 or more;</li> <li>Other than Public Official valued at AUD 50 / CAD 50 / PGK 100 or more; or</li> <li>In aggregate AUD 1,500 / CAD 1,500 / PGK 3,000 over 12 months</li> </ul> Refer also to the mandatory criteria for gifts and hospitality set out in section 8.1 of the Anti-Bribery Anti-Corruption Policy				Any items above thresholds or which are cash / cash equivalents must be approved by GM or above	Nil	Nil

# ST BARBARA GROUP - SOCIAL MEDIA POLICY

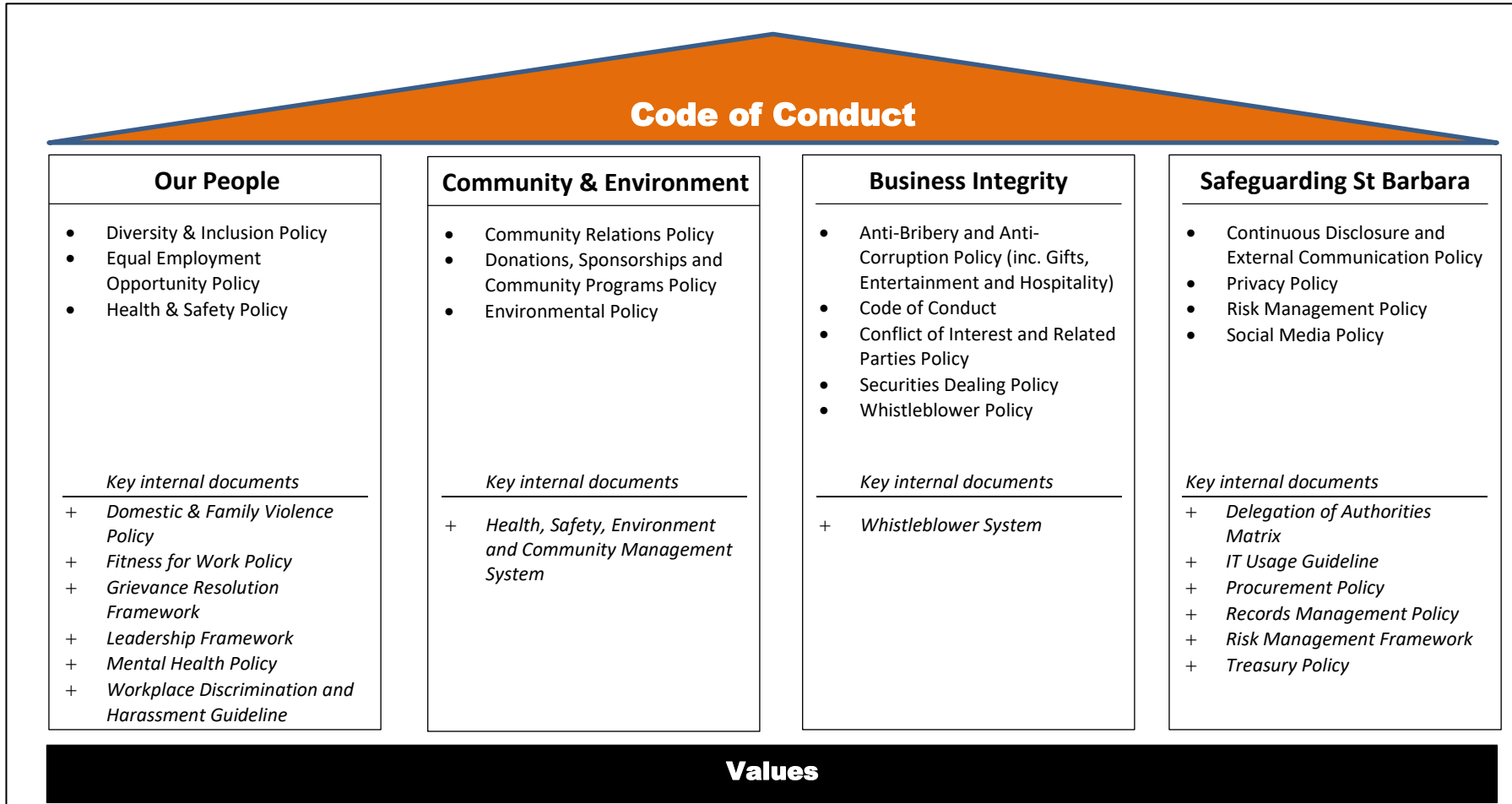
Document Owner	<b>Company Secretary</b>
First Originated	09-Dec-14 (in section 7.5 of the Acceptable IT Usage Procedure)
Previous Revision	19 February 2019
Issue Date (this revision)	25 February 2020

**UNCONTROLLED COPY WHEN PRINTED**

# St Barbara Code of Conduct Framework

This Code is one component of St Barbara’s Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on [www.stbarbara.com.au](http://www.stbarbara.com.au)

○ = Document in preparation

+ = Internal document published on ROCKi



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## 1. SUMMARY OF THIS POLICY

This Social Media Policy (**Policy**) outlines the standards St Barbara Personnel must observe when using Social Media for business or personal use, the circumstances in which St Barbara will monitor your use of Social Media and the action St Barbara will take in respect of breaches of this Policy.

Content published on the internet can remain in the public domain indefinitely and can be replicated far beyond the initial posting. Once published, it can be impossible to retract or remove a posting. This Policy has been prepared to avoid inappropriate use of Social Media, which has the potential to adversely impact the reputation of St Barbara and the personal reputation of St Barbara employees.

In accordance with St Barbara's Acceptable IT Usage Guideline, St Barbara monitors the use of Social Media by employees on the St Barbara network.

Breach of this Policy may result in disciplinary action up to and including removal of access to Social Media, termination of employment for employees, or termination of contract for contractors or consultants.

## 2. PURPOSE

St Barbara Limited and its subsidiaries (collectively, **St Barbara**), requires and expects that its directors, officers, employees, agents, contractors and any other party representing St Barbara, wherever they are in the world, will act ethically, honestly, with integrity and in compliance with the law.

All St Barbara Personnel are expected to act at all times in accordance with our Values:

- We act with honesty and integrity
- We treat people with respect
- We value working together
- We deliver to promise
- We strive to do better.

The purpose of this Policy is to help St Barbara Personnel understand how to use Social Media appropriately.

## 3. SCOPE

This Policy applies to all individuals at all levels who are employed by, act for, or represent St Barbara anywhere in the world (referred to in this Policy as **you**, or **St Barbara Personnel**), including:

- (a) directors;
- (b) officers;
- (c) managers;
- (d) employees;
- (e) contractors;
- (f) consultants;

- (g) agents; and
- (h) any other person representing or acting on behalf of St Barbara.

This Policy applies to St Barbara Personnel irrespective of their employment status (that is, whether they are employed on a full-time, part-time, maximum term, casual or temporary basis).

This Policy applies whenever St Barbara Personnel use Social Media where that use may impact on St Barbara and applies irrespective of whether the use of Social Media occurs for work purposes or for private use, during or outside of work hours, at the workplace or outside the workplace, or on St Barbara assets or non-St Barbara assets.

#### **4. WHAT IS SOCIAL MEDIA**

For the purposes of this Policy, **Social Media** means any online social network that is a website or an app that allows a user to create and share content online. This often involves sharing comments, messages, photos and videos.

Examples of online social networks include, but are not limited to:

- instant messaging – Lync, SMS, WhatsApp, Viber, MS Messenger;
- social networking – Facebook, LinkedIn, Yammer, Snapchat, dating websites;
- video and photo sharing – YouTube, Flickr, Instagram, Pinterest
- blogs – Twitter, Tumblr, corporate, professional and personal blogs;
- forums and discussion boards – Whirlpool, Yahoo! Groups;
- online encyclopaedias – Wikipedia;
- freelancing websites – Uber, Freelancer.com, Airtasker; and
- social media applications.

#### **5. APPROPRIATE USE OF SOCIAL MEDIA**

St Barbara Personnel must observe the following standards when using Social Media for official business or in a personal capacity:

- (a) Comments on Social Media must not breach any relevant St Barbara policies, including, but not limited to St Barbara's:
  - Values;
  - Code of Conduct;
  - Continuous Disclosure and External Communication Policy;
  - Securities Dealing Policy;
  - Workplace Discrimination & Harassment Guideline;
  - Privacy Policy; and
  - Acceptable IT Usage Procedure.
- (b) St Barbara Personnel must not make comments or postings of the following nature:
  - insulting or discriminatory comments;

- sexually provocative, obscene or harassing statements;
- inflammatory or defamatory comments;
- comments that bully or degrade others;
- misleading, deceptive or unsubstantiated claims;
- personal or confidential information obtained in their capacity as an employee/contractor of St Barbara, including but not limited to unreleased financial information, exploration results, merger and acquisition activities, and any commercial terms with St Barbara suppliers;
- any information which may damage St Barbara or St Barbara’s share price or reputation; or
- any negative remarks or implications regarding St Barbara, or St Barbara employees, contractors, directors and officers;
- any information which could result in harm, harassment or endanger St Barbara employees, contractors, directors and officers; and
- comments that imply that St Barbara endorses, approves or is in any way associated with your personal views expressed on any social media platform.

(c) St Barbara Personnel must:

- be respectful of others when using Social Media. Remember that anything you post will remain available to be read by millions of people on the internet and comments can easily be taken out of context by people in different industries and cultural backgrounds.
- adhere to the terms of use of the relevant Social Media platform or website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.

## 6. OFFICIAL USE OF SOCIAL MEDIA

The use of Social Media for official use on behalf of St Barbara requires prior approval from the Company Secretary and/or Managing Director & CEO in accordance with and subject to the Continuous Disclosure and External Communication Policy.

St Barbara currently uses Social Media (including Facebook, Twitter and LinkedIn) for various business uses including:

- investor relations as a means of communicating with shareholders, analysts and interested observers; and
- human resources to advertise vacant positions.

In official communication St Barbara Personnel must use their real name or official St Barbara on-line alias, not fake identities.

Unless authorised to do so, St Barbara Personnel must not present themselves as representing St Barbara’s views in any way. If circumstances necessitated publishing something that identifies you as a St Barbara employee or contractor without explicit approval, be clear you are speaking for yourself and use a disclosure such as “The statements or opinions expressed above [or on this site] are my own and do not necessarily represent those of St Barbara”.

## **7. PERSONAL USE OF SOCIAL MEDIA**

Inappropriate use of Social Media, even in a personal capacity, has the potential to adversely impact the reputation of St Barbara and the personal reputation of St Barbara employees and others, which can extend to financial loss for St Barbara and individuals.

St Barbara Personnel must ensure that personal use of Social Media using St Barbara assets:

- (a) is minimal and takes place substantially outside of rostered working hours;
- (b) does not breach any of the rules set out in this Policy; and
- (c) does not interfere with business or St Barbara's commitments.

## **8. CONSEQUENCES OF BREACHING THIS POLICY**

All St Barbara Personnel are individually responsible for ensuring they comply with this Policy at all times.

St Barbara Personnel should be aware that any use of Social Media (irrespective of whether the use of Social Media occurs for work purposes or for private use, during or outside of work hours, at the workplace or outside the workplace, or on St Barbara assets or non-St Barbara assets) may be monitored and, where breaches of this Policy are found, action may be taken under our Discipline Management Process. St Barbara reserves the right to restrict or prevent access to certain Social Media websites on St Barbara IT assets if St Barbara considers personal use to be excessive or there has been a breach of this Policy.

Failure to comply with this Policy may result in disciplinary action up to and including termination of employment for employees, or termination of contract for contractors or consultants. St Barbara Personnel may also be individually subject to other legal consequences for failing to comply with this Policy, including potential exposure to legal claims by St Barbara and third parties, fines or other penalties.

If a breach of this Policy appears to constitute an offence under an applicable law, St Barbara may be obliged to refer the suspected breach to the appropriate law enforcement agencies.

## **9. FURTHER GUIDANCE**

Please contact your Immediate Manager or the Company Secretary if you have any questions relating to this Policy.

## **10. POLICY REVIEW**

This Policy is to be reviewed at least once every 2 years.

# ST BARBARA GROUP

## WORKPLACE BEHAVIOUR POLICY

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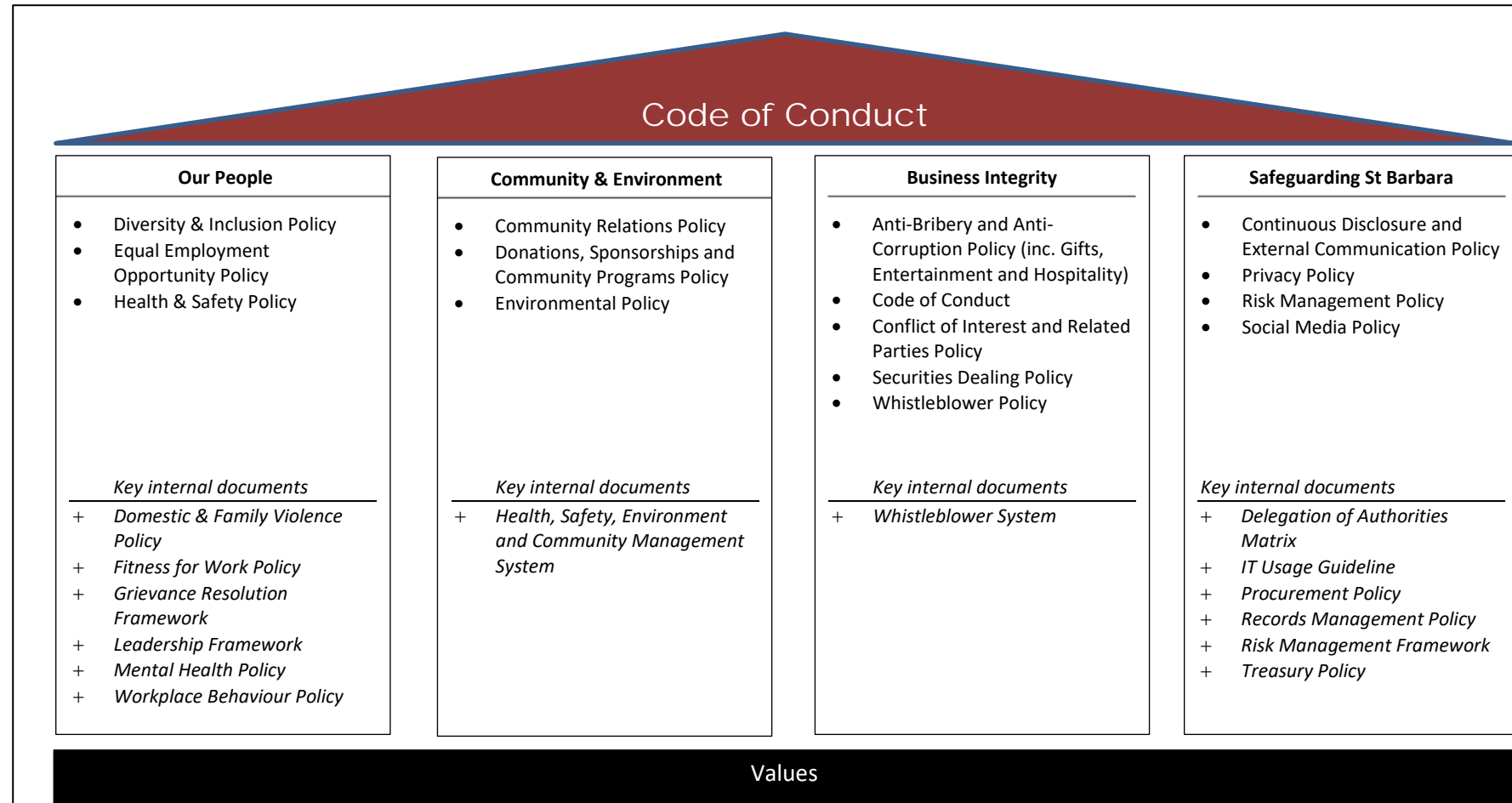
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## St Barbara Code of Conduct Framework

This Policy is one component of St Barbara’s Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on [www.stbarbara.com.au](http://www.stbarbara.com.au)

○ = Document in preparation

+ = Internal document published on ROCKi



## 1. OVERVIEW

St Barbara Limited and its subsidiaries (**St Barbara**) is committed to ensuring a work environment which is free from unlawful and unacceptable behaviour and where all employees are treated with dignity, courtesy and respect. St Barbara does not tolerate unlawful behaviour including discrimination, harassment or any form of violence at work.

St Barbara expects people to:

- behave in a responsible and professional manner;
- treat others in the workplace with courtesy and respect;
- listen and respond appropriately to the views and concerns of others; and
- be fair and honest in their dealings with others.

This Policy is aligned with the St Barbara Values:

- We act with honesty and integrity
- We treat people with respect
- We value working together
- We deliver to promise
- We strive to do better

All St Barbara Personnel must ensure that they:

- are familiar with and comply with this Workplace Behaviour Policy (**Policy**); and
- complete regular training related to this Policy as provided by St Barbara.

Any actions which are alleged to be in breach of this Policy may be regarded as misconduct and will be investigated under St Barbara Discipline Management System. Where allegations are substantiated as a result of an investigation, the matter is then addressed where disciplinary action up to and including termination of employment will be determined.

Any St Barbara employee who is found to have made a false, slanderous or malicious complaint under this Policy may also be subject to disciplinary action up to and including termination of employment.

## 2. PURPOSE

The purpose of this Policy is to:

- ensure that all St Barbara Personnel understand and are aware of what is considered to be unlawful behaviour including discrimination, bullying, harassment and workplace violence; and
- to provide a framework for St Barbara Personnel to raise and effectively resolve any unlawful behaviour that has been witnessed or experienced in the workplace.

## 3. SCOPE

This Policy applies to all individuals at all levels who are employed by, act for, or represent St Barbara or any of its subsidiaries anywhere in the world (**St Barbara Personnel**), including:

- a) directors;
- b) officers;
- c) managers;
- d) employees;

- e) contractors;
- f) consultants;
- g) agents; and
- h) any other person representing or acting on behalf of St Barbara.

This Policy applies to all St Barbara Personnel during the course of their work:

- in the workplace, including work or work-related activities outside normal working hours;
- during work activities, including interactions with external parties;
- at work-related events, including conferences and social functions; and
- on social media where St Barbara Personnel interact with colleagues or others where their actions may affect St Barbara Personnel either directly or indirectly.

All St Barbara employees are required as a condition of their employment to ensure that their behaviour is consistent with the standards of behaviour set out in the St Barbara *Code of Conduct* and St Barbara Values and includes but is not limited to:

- interacting with others in a professional, courteous and polite manner that does not interfere with the health, safety and comfort of others;
- treating others respect, dignity and fairness; and
- communicating in a clear, calm and professional manner.

## 4. SUPPORTING DOCUMENTS

The following supporting St Barbara documents can be found on ROCKi:

- Grievance Resolution Framework
- St Barbara Values
- Code of Conduct
- Domestic and Family Violence Policy
- Social Media Policy
- Acceptable IT Usage Procedure
- Equal Employment Policy
- Diversity and Inclusion Policy
- Discipline Management System: Overview

### Country Specific Legislation

This Policy should be interpreted in the context of country specific laws (including, but not limited to the legislation set out below). To the extent where there is any inconsistency with the country-specific laws and this Policy, the applicable laws of that country will prevail.

#### Australia

#### Federal laws

Fair Work Act 2009 (Cth)  
 Workplace Gender Equality Act 2012 (Cth)  
 Work Health and Safety Act 2011 (Cth)  
 Age Discrimination Act 2004 (Cth)  
 Disability Discrimination Act 1992 (Cth)  
 Sex Discrimination Act 1984 (Cth)  
 Australian Human Rights Commission Act 1986 (Cth)  
 Racial Discrimination Act 1975 (Cth)

#### **State laws**

Equal Opportunity Act 2010 (Vic)  
Charter of Human Rights and Responsibilities Act 2006 (Vic)  
Racial and Religious Tolerance Act 2001 (Vic)  
Equal Opportunity Act 1984 (WA)  
Anti-Discrimination Act 1991 (Qld)

#### **Canada**

#### **Federal laws**

Canada Human Rights Act (R.S.C. 1985)  
Employment Equity Act (S.C. 1995)  
Canada Labour Code (R.S.C. 1985)

#### **Province of Nova Scotia laws**

Human Rights Act (1989)

#### **Papua New Guinea**

Employment Act 1978  
Discriminatory Practices Act 1963  
HIV/AIDS Management and Prevention Act 2003

## **5. UNLAWFUL & UNACCEPTABLE BEHAVIOUR**

The following details types of unlawful and unacceptable behaviour covered under this Policy:

### **5.1 WORKPLACE VIOLENCE**

Workplace violence is a physical attack or threat to a worker, or group of workers that creates a risk to health and safety. Examples of workplace violence include but not limited to:

- striking, kicking, scratching, spitting and tripping;
- grabbing, shoving, pushing or any direct contact;
- throwing objects or attacking with any form of weapon; and
- threatening to harm an individual or his/her family, friends or associates, or their property.

St Barbara maintains a complete and total ban on the possession of weapons on St Barbara premises. This includes weapons kept in a vehicle while on St Barbara premises. Weapons include but are not limited to firearms of any description, bows, crossbows, arrows, slingshots, airguns, spears, swords or knives.

### **5.2 DISCRIMINATION**

#### **Unlawful Discrimination**

Unlawful workplace discrimination occurs when an employer takes adverse action or unfavourable treatment against a person who is an employee or prospective employee because of one or more of their 'protected attributes'.

**'Protected Attributes' include but are not limited to:**

- race
- colour
- gender identity or sex
- sexual preference
- age
- physical or mental disability
- marital status

- family or carer's responsibilities
- pregnancy and breastfeeding
- religion
- political opinion / industrial activity
- national extraction or social/ethnic origin

### **Adverse Action/Unfavourable treatment**

For discrimination to be unlawful, there needs to have been (or proposed to be) some unfavourable treatment or adverse action. In the workplace, unfavourable treatment or adverse action may include undertaking, threatening or organising any of the following as a result of a 'protected attribute':

- terminating an employee;
- injuring an employee;
- changing an employee's role to their disadvantage or detriment;
- discriminating between one employee and another employee;
- refusing to employ a prospective employee; and
- offering a potential employee different (and unfair) terms and conditions compared to other employees.

### **Types of Unlawful Discrimination**

There are two types of unlawful discrimination:

- 1. Direct discrimination** occurs when an employer takes adverse action against an employee or treats an employee less favourably because of an attribute which is protected by law. Direct discrimination often happens because people make unfair assumptions about what people with certain personal characteristics can and cannot do.

#### ***Examples of Direct Discrimination:***

- An employee tells her manager she is pregnant and will soon be taking the parental leave she is entitled to. The employer terminates the employee because she is pregnant.
- An employee asks about a job as a truck driver that has been advertised. She is told not to apply because they are only looking for male truck drivers.
- A man phones about a job advertised for a cook on site. He is told not to apply because he is a man and site is only looking for female cooks.

- 2. Indirect discrimination**, in the workplace occurs when a work requirement, condition or practice seems the same for all employees, but actually disadvantages certain people because of a protected attribute. To be considered as unlawful discrimination, the work requirement must also be considered unreasonable.

#### ***Examples of Indirect Discrimination:***

- To pass probation for an office role, all new employees were required to pass an eye test, even though first-rate vision was not required for the role. One new employee has vision impairment and fails their probation because they cannot pass this test.
- An employer says they will only renew the employment contracts of employees who are on a 1 year maximum term contract, if they have not made a workers' compensation claim. An employee's contract is not renewed because they made a workers' compensation claim after being injured at work.

## Lawful Discrimination

In some circumstances, treating someone differently is not necessarily unlawful discrimination. This may include where the adverse action or unfavourable treatment:

- is permissible under applicable anti-discrimination laws; and
- is based on the inherent requirements of the role concerned.

Discrimination is not unlawful if action is taken because of the inherent requirements of a role or due to genuine occupational requirements, which may include a person's ability to respond in emergency situations and being able to adequately perform the role without endangering themselves or others.

### **Example of Lawful Discrimination:**

- A potential employee is unable to obtain a particular licence due to a certain disability; however as this licence forms an inherent requirement of the role, the potential employee is unsuccessful in their application for the role.

## 5.3 HARASSMENT

For the purposes of this Policy, harassment is defined as *'any words, physical behaviour or conduct, which is unwelcome or offensive to an employee'*.

The types of harassment covered within this Policy are:

- workplace or work-related harassment;
- bullying;
- display of offensive materials;
- sexual harassment; and
- victimisation.

### **Workplace or Work Related Harassment**

Workplace or work related harassment consists of offensive, abusive, intimidating or threatening behaviour directed at a person or persons because of an attribute which is protected by law. Unlawful harassment occurs in a workplace when a person is made to feel intimidated, insulted or humiliated because of a 'protected attribute'.

### **Bullying**

Workplace bullying is 'repeated' and 'unreasonable behaviour' directed towards a person or persons that creates a risk to their health and safety. Due to the effect on the safety and health of personnel at the workplace, bullying is unlawful.

'Repeated behaviour' refers to the persistent nature of the behaviour and can involve a range of behaviours over time.

'Unreasonable behaviour' is behaviour which victimises, humiliates, intimidates or threatens a person, either physically or verbally.

Examples of bullying behaviour include, but are not limited to:

- aggressive or intimidating conduct;
- belittling or humiliating conduct;
- victimisation;
- spreading malicious rumours;
- teasing, practical jokes or 'initiation ceremonies';

- exclusion from work-related events;
- unreasonable work expectations, including too much or too little work, or work below or beyond a worker's skill level;
- displaying offensive material;
- pressure to behave in an inappropriate manner; and
- sending threatening messages using email, SMS or other forms of social media.

### **What is not considered to be workplace bullying?**

It is reasonable for supervisors and managers to allocate work and give feedback on a worker's performance. These actions are not considered to be workplace bullying if they are carried out lawfully and in a reasonable manner.

Examples of reasonable management action include but are not limited to:

- directing and controlling how work is done (a fundamental right of all employers);
- allocating rosters and working hours to suit role and business requirements;
- constructively delivered feedback or counselling that is intended to address an employee's substandard performance and/or unacceptable behaviour;
- genuine disciplinary processes or substandard performance management processes.

### **Display of Offensive Material**

St Barbara Personnel are prohibited from displaying any material which may cause offence to another person. Any materials, which could be interpreted as offensive, that are displayed at a workstation or anywhere within the workplace must be removed. Examples of such materials include, but are not limited to:

- posters, cartoons or electronic images of a political, sexual or sexist nature;
- offensive computer software, including screen-savers, internet images and games;
- pornographic literature, including videos and magazines;
- racist graffiti and cartoons, or slogans of a racist nature; and
- cartoons which poke fun at individuals or groups of people.

All St Barbara Personnel are accountable for ensuring that offensive material is not displayed in the workplace and if it is, that it is removed immediately. Where there is uncertainty with respect to the offensive material, the matter should be referred to a Human Resources representative.

### **Sexual Harassment**

Sexual harassment is associated with unwelcome sexual advances, requests for sexual favours or other unwelcome conduct of a sexual nature and in which circumstances a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can involve St Barbara Personnel, clients, customers and others connected with or attending a workplace. It can happen at work, at work-related events or activities, or between colleagues outside the work environment including interaction on social media. Sexual harassment may be physical, verbal or written and may include but not limited to:

- sexual advances or requests for sexual favours;
- acts of physical intimacy;
- remarks or statements with sexual connotations, including slurs or jokes;

- gestures, actions or comments of a sexual nature; and
- sexually explicit emails or materials

A single action of unwelcome sexual behaviour may constitute unlawful sexual harassment. This means that it does not have to be continuous or repeated behaviour.

#### 5.4 VICTIMISATION

Victimisation means subjecting a person to some form of detriment or harm because that person has:

- asserted their rights under this Policy, the St Barbara Grievance Resolution Framework, or relevant legislation;
- alleged that a member of St Barbara Personnel has breached this Policy, the St Barbara Grievance Resolution Framework, or relevant legislation; and
- assisted someone in raising an issue.

It is against the law to punish or threaten to punish someone because they have made a complaint, helped someone else make a complaint or refused a work direction because it may be considered as unlawful discrimination, harassment, sexual harassment or victimisation.

## 6. ADDRESSING UNLAWFUL BEHAVIOUR

All St Barbara leaders are responsible to address all incidents of unlawful and unacceptable behaviour in the workplace in accordance with this Policy.

Managers are required to immediately initiate the Discipline Management System if they directly witness any of their team members breach this Policy.

In an instance where alleged unlawful behaviour is **not** directly witnessed by a manager, this Policy applies.

St Barbara Personnel who believe that they have experienced or witnessed unlawful behaviour in the workplace (**Complainant**) are encouraged to bring the matter to the attention of their manager in the first instance. If the Complainant does not feel comfortable approaching their manager, they are encouraged to approach their manager-once-removed or Human Resources representative at the earliest possible opportunity.

The Complainant has two options in addressing an incident of unlawful behaviour in the workplace under this Policy:

**Option 1: Informal Discussion**

**Option 2: Formal Complaint**

**It should be noted that if the allegation/s warrant/s it, St Barbara reserves the right to investigate an issue even if a *Formal Complaint* has not been lodged, regardless of the preference of the Complainant.**

#### OPTION 1: INFORMAL DISCUSSION

*Informal Discussion* may be considered as the first option. The purpose of the *Informal Discussion* is for the Complainant to raise the matter with the respondent of the complaint (**Respondent**) with the aim to resolve the matter between them without the need for a formal

investigation. The Complainant may also request the informal discussion to occur with the manager and/or Human Resources representative present.

If the matter is resolved through the *Informal Discussion*, no further action is required. If the matter is not resolved using the *Informal Discussion*, **Option 2** is to be considered by the Complainant.

### **OPTION 2: FORMAL COMPLAINT**

If the Complainant elects to make a *Formal Complaint* against the Respondent, the Complainant must lodge a written complaint with their manager, manager-once-removed or Human Resources representative. The written complaint should detail the issue/s or incident/s, date/s, witnesses and include the name of the Respondent. When submitting the written complaint, the Complainant should advise that they are lodging a *Formal Complaint* under this Policy.

Verbal complaints will be accepted in the first instance and must be reported to the manager, manager-once-removed or Human Resources representative. However, the Complainant may be requested by St Barbara to lodge a written complaint within 24 hours of making the verbal complaint.

The person who receives the *Formal Complaint* will immediately and confidentially inform the Complainant's manager, the relevant manager-once-removed and Human Resources representative to initiate the formal investigation process. However, if the Respondent holds any of these roles, then the person receiving the complaint will use their discretion and consult with the relevant Human Resources representative.

**In certain cases, where the allegations warrant it, an investigation may be required regardless of the preference of the Complainant.**

For details on the investigation process under the Discipline Management System, please refer to the Discipline Management System Overview.

### **Suspension On Pay**

In certain cases, to ensure that the investigation is conducted fairly and to ensure that there is no risk to any employee's health, safety and well-being, the Complainant and/or the Respondent may be placed on *Suspension on Pay*. This decision will be determined by the manager and authorised by the relevant General Manager and General Manager Human Resources.

## **7. CONFIDENTIALITY**

St Barbara requires that all persons involved in an investigation of a complaint preserve the confidentiality of the matter and where practicable, any information or discussion of the complaint is kept between those persons directly involved. Employees interviewed in relation to an investigation, or who participate as a support person, will be provided with a Confidentiality Statement and will be required to sign this document as acknowledgement of their understanding. All breaches of confidentiality will be treated as misconduct and may be subject to disciplinary action up to and including termination of employment under the Discipline Management System.



In certain circumstances, St Barbara may be required to act on information it receives, which may include reporting the incident to the relevant authorities, external legal providers or other parties. Subject to any whistleblower law requirements, this may include providing details of the allegation/s, investigation documents and the Respondent's name.

## **8. ACCOUNTABILITIES**

The following outlines the accountabilities of key roles under this Policy:

### **COMPLAINANT**

The Complainant is accountable to:

- decide which course of action is appropriate to resolve the matter (refer to Section 5: Option 1 Informal Discussion or Option 2 Formal Complaint); and
- provide honest and accurate information to St Barbara as required.

### **RESPONDENT**

The Respondent is accountable to:

- provide honest, complete and accurate information to St Barbara as required.

### **MANAGER**

All St Barbara managers are accountable to ensure compliance with this Policy and are accountable to:

- seek advice from Human Resources in addressing workplace behaviour;
- address all directly witnessed unlawful discrimination or harassment in the workplace;
- address all Formal Complaints received as set out in this Policy;
- inform the manager-once-removed and Human Resources of a Formal Complaint; and
- if required and in consultation with their manager-once-removed and Human Resources, initiate Suspension on Pay for an employee pending an investigation.

### **MANAGER-ONCE-REMOVED**

The manager-once-removed is accountable to:

- inform Human Resources of a Formal Complaint;
- consider if an employee is placed on Suspension on Pay pending an investigation; and
- review and authorise the findings report prepared by Human Resources following the investigation.

### **HUMAN RESOURCES**

Human Resources are accountable to:

- provide advice to St Barbara Personnel on this Policy;
- clarify if the Complainant is making a Formal Complaint under this Policy, and if so, follow the process as outlined in this Policy;
- consider if legal advice is required;
- conduct the investigation;
- review and authorise the findings of the investigation;

- ensure Contact Officers are in place across St Barbara; and
- provide ongoing training, support and coaching for St Barbara employees, managers and Contact Officers.

### CONTACT OFFICER

Contact Officers are St Barbara employees conversant with St Barbara’s Grievance Resolution Framework which incorporates this Policy, the Fair Treatment System and the Whistleblower System. A list of Contact Officers is available on St Barbara’s Intranet (ROCKi) or by contacting a Human Resource representative.

Contact Officers are accountable to:

- provide information on options to employees to resolve their grievances; and
- provide information on support and counselling available through St Barbara’s Employee Assistance Program.

### SUPPORT PERSON

Support persons are accountable to:

- take notes during investigation interviews as requested by the Respondent; and
- act as a witness during investigation interviews.

The support person does **not** express their opinion, advocate for the employee or actively participate in the investigation interview.

## 9. SUPPORT

Contact your manager, Human Resources representative or Contact Officer if you have any questions relating to this Policy. You also have the option of reporting the unlawful behaviour to St Barbara’s confidential external independent Whistleblower Provider, Your-Call. A secure report can be made (including an anonymous report) via:

Website: [www.yourcall.com.au/report](http://www.yourcall.com.au/report) (Company ID: STBM1986)

**Telephone** line 9:00am to 12:00am midnight Monday to Friday (AEST / Melbourne time) except National Public Holidays. Calls are taken by a trained Protected Disclosure Officer

Australia	1300 798 101
Canada	(800) 897 2761
PNG	00086 1281

*Your-Call* will notify St Barbara’s Whistleblower Protection Officers within 24 hours of receiving a report. An automated message will be sent to the discloser to confirm the report has been sent to St Barbara.

**Postal Mail:** St Barbara Whistleblower Service  
 Locked Bag 9  
 Collins St East VIC 8003  
 Australia

For more information, please refer to the St Barbara Whistleblower Policy.