



# OUR APPROACH TO CLOSURE

Closure is a complex, evolving and iterative process. Successful closure involves collaboration with various stakeholders, including our people, local communities, Indigenous, Traditional and Tribal Peoples, government and regulatory agencies, local businesses and industry associations.

As a responsible custodian of the lands we operate on, closure forms an expected and crucial part of our life of operation planning and execution. We prioritise effective closure planning from the early stages of development and throughout the lifecycle of our operations. Progressive restoration and rehabilitation also form an integral part of our daily operations.

We are committed to operating with a disciplined approach of limiting our disturbance and effectively managing our closure activities to help facilitate the smooth transition of the lands we have operated on to the next land user, in accordance with the principles outlined in the ICMM Integrated Mine Closure Good Practice Guide 2019.

## **Our commitments**

We are committed to:

- Closing our operating assets in a responsible manner that aligns with our purpose and meets our regulatory obligations and commitments to stakeholders;
- Seeking out best practice methodologies which focus on restoring the natural environment, including species, habitats and ecological communities;
- Encouraging local and regional participation in closure activities;
- Working to identify opportunities to build capacity for affected communities post cessation of operations; and
- Assessing the environmental values within and adjacent to our operational footprint and cumulative impacts of climate change on the environment.

#### **Meeting our commitments**

The principles that support us to meet our commitments include:

- **Stakeholder engagement:** We seek to actively engage with our people, contractors, suppliers and affected communities to determine their expectations, concerns, aspirations, and vision in the region post-production;
- Applying a context-based approach: We look to tailor our engagement to the individual context relevant to our operations and projects;
- Transparency: We look to undertake inclusive public participation and provide transparent information in a timely and meaningful way on post-production scenarios and associated transitions;
- **Progressive rehabilitation:** We recognise that progressive rehabilitation of ecosystems actively manages closure liabilities and demonstrates to stakeholders our commitment to environmental and social stewardship;

- Valuing biodiversity: We recognise the importance of protecting and conserving biodiversity, and the dependency of people, communities and society on healthy functioning ecosystems;
- **Cultural heritage:** We acknowledge the importance of promoting and protecting cultural heritage, so it can be enjoyed by present and future generations;
- **Safety:** We manage our hazardous facilities with the aim of protecting our people, surrounding communities, the environment, and our physical assets post cessation of production; and
- Circular thinking: We pursue opportunities that will improve reuse, repurposing or recovery of waste streams to reduce our environmental and closure footprint.

## Our management approach

Our approach to closure starts with closure planning and ends with the transition of the site to the next land use in line with stakeholder and/or regulatory expectations. The key steps and activities in this process are outlined below.

Closure Planning:

- We develop and regularly maintain closure plans for all operations and projects under the operational control of South32.
- We prepare and review closure plans using experienced closure specialists and review them at a frequency to meet regulatory reporting requirements and/or new project approvals, or alternately at least every three years.

Closure Cost Estimates and Provisions:

- We develop, maintain and report closure cost estimates for all operations and projects under the operational control of South32.
- Closure cost estimates reflect the expected liability of closure and align with the ICMM Financial Concepts for Mine Closure (2019).

Progressive Rehabilitation:

- We identify and pursue progressive rehabilitation opportunities within closure plans to limit disturbed areas within our leases and enable a clear pathway to pursue relinquishment.
- Where progressive rehabilitation activities occur, we aim to utilise stored seed and topsoil stocks to maximise rehabilitation success and achieve optimal rehabilitation outcomes.

Pre-closure Studies and Readiness:

- We commence comprehensive, detailed closure studies which consider a range of feasible options to identify a preferred strategy.
- Closure readiness activities are designed to support the safe, effective transition of the site from an operational to a closure phase.

Closure Execution:

 Closure execution is a phase that commences at the end of an operation's or asset's operational life. This is an active phase with high intensity of work reshaping affected landforms, restoring and rehabilitating lands to promote re-establishment of ecosystems, flora and fauna consistent with surrounding environmental values.

Post Closure:

 This is the final phase of the closure lifecycle where the facility moves into a monitoring and maintenance phase. During this time we will monitor and track rehabilitation progress to meet our obligations and commitments.

#### What guides us

Our approach to closure is guided by global standards and initiatives including ICMM Principles 2 – Decision Making, 3 – Human Rights, 4 – Risk Management, 6 – Environmental Performance, 7 – Conservation of Biodiversity, 8 – Responsible Production and 9 – Social Performance, United Nations Sustainable Development Goals 9.4 and 12.2 and United Nations Global Compact Environment and Human Rights Principles.

Our commitment to closure is supported by our Board-approved Sustainability Policy and managed through our internal closure, social performance, dams, and environment and climate change standards, which are supplemented by operational procedures that account for local and regional closure, environmental and social needs, and regulatory requirements.

#### Governance

Our Board has ultimate responsibility for our company's governance and strategic direction. The Sustainability Committee assists the Board in its oversight of our sustainability management, performance, assurance, and reporting practices. This includes endorsing our publicly disclosed closure commitments to the Board for approval and monitoring the adequacy and effectiveness of our closure approach.

Management accountability for closure is assigned to our Chief Operating Officers.

We periodically undertake internal and independent third-party assurance to assess compliance with our internal standards, as well as the ICMM Mining Principles and associated Performance Expectations, with a view to continually improving closure performance across our operating footprint.

## Application

This approach applies to all Directors, management, employees, contractors and third parties who act on behalf of South32. We endeavour to influence our non-operated joint ventures to support the adoption of standards of conduct consistent with ours, as relevant within the limits of the joint venture arrangements.

Our approach will be reviewed every two years, or more frequently, if necessary, so it remains relevant and appropriate to South32's closure activities. It was approved by our Chief Legal and External Affairs Officer in June 2024.

#### To learn more

Further information on closure, including performance and progress, can be found on our Sustainability page and in our Annual Reporting Suite at <u>www.south32.net</u>.

