Environmental Management System Summary

Document No : **TW-PLN-043-EMS Summary**

Revision No : **2**

Issue Date : **04/03/2026**

Review Date : **March-27**

Revision Tracking

Revision	Comments	Prepared By	Reviewed By	Approved By	Date
1	Creation of document	J Easterbrook (Sol Environment)	S Butler (Sol Environment)	L Moore (Tungsten West)	19th February 2026
2	Creation of document	J Easterbrook (Sol Environment)	S Butler (Sol Environment)	L Moore (Tungsten West)	4th March 2026

TUNGSTEN WEST

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1 INTRODUCTION

This document has been prepared to provide a summary of the Environmental Management System (EMS) for Tungsten West in preparation for operations recommencing at Hemerdon Mine and in support of the following permits held on site:

- EPR/AP3203ML – Mineral Processing Facility;
- EPR/JB3209MD – Mining Waste Facility;
- EPR/GB3597DR – Sealed Sources;
- EPR/WB3893DT – Sewage Treatment Plant;
- SW/047/0002/020 - Pit Abstraction (Dewatering licence);
- SW/047/0002/003 – Tory Pond Impoundment;
- SW/047/0002/022 – Tory Pond Abstraction;
- SW/047/0002/005 – Loughter Mill Impoundment;
- SW/047/0002/023 – Loughter Mill Abstraction;
- EPR/DB3290RH – Elford Pond Discharge; and
- EPR/QP3420XX – Smallhanger North and South Tank Discharge.

The development of the site consists of three main areas:

1. The mining, quarrying and base mineral extraction operation. This is carried out under Planning authorisations;
2. The Mineral Processing Facility (MPF), which is regulated by the Environment Agency. The MPF is designed to crush and separate mineral ore, which then undergoes a series of physical and chemical processes to remove inert ferrous contaminants and separate the tungsten and tin concentrates for export offsite; and
3. The Mining Waste Facility (MWF), which is regulated by the Environment Agency. The MWF is designed to contain the mining waste associated from the MPF.

The EMS sets out how the environment will be managed on site in accordance with the Environmental Permits and the Environment Agency Guidance 'Develop a management system: environmental permits' (available at https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) ('EA Guidance'). The EMS explains what happens at Tungsten West to ensure the following:

- The environment is protected from adverse impacts from the activities;
- The organisation is protected from environmental conditions such as floods or droughts;
- The Permit and environmental legislation are complied with;
- The sustainability of the operations is addressed; and
- Environmental information and performance are communicated to relevant interested parties.

The EMS will be continually developed and maintained by Drakelands Restoration Limited (the operator of the Environmental Permits).
Tungsten West is committed to continually improving this system and will do so through regular reviews, updates and feedback (plan, do, check and act).

2 IMPLEMENTATION OF THE EMS

As the site enters into production, Tungsten West have established an EMS which will be implemented prior to commissioning of the MPF and the site as a whole. The EMS will be subject to continual improvement and periodic review. Tungsten West strive to achieve ISO 14001 certification by Q3 2027.

Further to this, Tungsten West propose to establish an Integrated Management System (IMS) including an ISO 14001 Environmental Management System, an ISO 9001 Quality Management System, an ISO 45001 Health & Safety Management System, and an ISO 50001 Energy Management System and achieve certification by Q3 2027.

3 SCOPE

Tungsten West is a mining development company focused on the restarting of Hemerdon Mine located in South Devon, UK. The restart of operations will focus on the mining, quarrying and extraction of base minerals and the operation of the MPF, MWF and associated infrastructure.

This scope will be reviewed on an annual basis during the external management systems audit. As Tungsten West enter into production, the scope of the management system will change to reflect this. Implementation of any system changes will be the responsibility of the Environmental Manager.

At present, the site possesses the following infrastructure for operations to recommence:

- Tarmac site access roads;
- Internal haul roads;
- Surface water management infrastructure including leats, culverts, catchpits and ponds;
- A Category A (Mine Waste Directives, 2006) Mine Waste Facility (MWF);
- A Mineral Processing Facility (MPF) Installation (incl ROM pad);
- An Administration office;
- Sewage treatment facility;
- A gatehouse and associated security systems;
- Maintenance and stores buildings;
- A metallurgical laboratory;
- Heavy plant workshop, fuel storage and metering facility;
- Raw water pumping station and pipeline;
- Potable water pipeline;
- High voltage power supply; and
- An offsite warehouse.

4 LAYOUT OF THE EMS

The EMS is laid out in a similar fashion to ISO 14001:2015, focusing on a 'Plan-Do-Check-Act' cycle of management and control. Each section is briefly summarised in this document with reference to the requirements of the EA Guidance for clarity. The section headings are as follows:

- Risks and opportunities;
- Management of the EMS;
- Pollution prevention planning;
- Competence and awareness;
- Communication;
- Control of documents and data;
- Operational planning and control;
- Emergency preparedness and response;
- Monitoring and measurement;
- Internal audit;
- Management review;
- Improvement; and
- Site Closure and Decommissioning.

5 CONTEXT OF THE EMS

The level of detail and complexity of the EMS is determined using a life cycle approach based on compliance obligations, interested parties, internal and external issues and other issues and requirements such as the outcome of audits and management reviews.

Risks and opportunities associated with the environmental discharge are identified and recorded in the initial stages of the EMS design to prioritise significant environmental risks, consider the benefit of opportunities, and have a thorough understanding of the scope of environmental protection required.

6 MANAGEMENT OF THE EMS

Managers of Tungsten West's activities take their responsibility for environmental compliance and sustainability very seriously. To make the structure of responsibilities clear, the EMS includes an organisation chart.

Tungsten West are keen to identify opportunities to prevent or mitigate adverse environmental impacts and enhance beneficial environmental impacts, particularly those with strategic implications, to remain effective at environmental protection. Environmental management is therefore integrated into the project development plans and decision making, aligning it with other business priorities.

7 POLLUTION PREVENTION AND PLANNING

The following aspects of the business have been included in various Environmental Risk Assessments, sourced from site plans and specialist reports:

- Authorised activities;
- Details of site drainage for surface water, foul and combined;
- Buildings, relevant plant and equipment and security fencing;
- Storage facilities for oil, fuel tanks, chemical stores, and waste materials;
- Spill kit locations and drain protectors;
- Emergency service routes in and out of the site;
- Pollution control inspection and monitoring points;
- Surface water and effluent discharge points; and
- Vulnerable locations.

7.1 Environmental Aspects

Tungsten West has established a Register of Environmental Aspects and Impacts. This Register is related specifically to the activities at Hemerdon, focusing on those that the company can control and influence. The Register sets these aspects against the impacts that can result and hence generates a quantitative measure of significance. The following aspects have been identified:

- Mineral Waste Management
- Water Abstraction and Usage
- Water Discharges
- Non-mineral Waste Management
- Use of Hazardous Substances
- Energy Management
- Emissions to Air
- Land Management
- Community and Stakeholder Relationship Management
- Noise (Audible and Low Frequency)
- Vehicle Use and Transport
- Ecology and Biodiversity
- Noise, Blasting and Vibration
- Radiation Sealed Sources

7.2 Legal Obligations and Commitments

Tungsten West has identified legal obligations and commitments which are applicable to the company and its operations in the UK, and how they apply to the mine's environmental aspects. Tungsten West have generated and manage a legal and compliance obligation register. This is reviewed annually and/or following any significant regulatory change.

8 COMPETENCE AND AWARENESS

A training matrix is in place to ensure that each member of staff that can affect the environmental performance of the installation is competent based on their training, education, and experience as appropriate. Records of training sessions and qualifications are maintained as part of the EMS.

The training matrix details who is responsible for various environmental procedures and which staff roles are relevant to the conditions of the Environmental Permits.

A procedure has been established for checking the training and qualifications of external providers in advance of carrying out work on site. They are provided with the information necessary to work in accordance with Tungsten West's Environmental Permits.

Tungsten West ensures that all employees and relevant contractors are made aware of:

- The importance of conformity with the environmental policy and procedures and with the requirements of the EMS;
- The significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance;
- Their roles and responsibilities in achieving conformity with the requirements of the EMS; and
- The potential consequences of departure from specified procedures.

9 COMMUNICATION

Communication with relevant interested parties are determined based on the information that needs to be communicated and the associated circumstances. Different types of communication will be considered to promote understanding of the EMS and engagement with interested parties at all levels.

Relevant staff have access to the EMS and are required to understand their duties and responsibilities as part of induction and ongoing training.

A process has been established for receiving communications from and responding to, internal and external communications, considering the needs and expectations of the interested parties.

Complaints are managed and recorded using procedures that lay out how complainants should be communicated with and how their complaint must be investigated.

10 RECORDS AND CONTROL OF DOCUMENTS AND DATA

Documented information for the EMS is developed, maintained, and controlled to ensure effective operations. Records required by the Environmental Permits are managed according to processes described in the EMS, including a list of their retention times. They include the following documents:

- Environmental Permits;
- Environmental Policy;
- Compliance Obligations;
- Duty of Care transfer notes for waste;
- Environmental Risk Assessment;
- Operating Procedures;
- Staff Competence and Training Matrix;
- Site and Equipment Maintenance Record;
- Emissions Monitoring Data;
- Records of compliance checks and audits, findings of investigations and actions taken;
- Records of complaints made, findings of investigations and actions taken;
- Audit Reports including findings and actions taken; and
- Management reviews and changes made to the EMS.

Data is protected through software and online security controls.

11 OPERATIONAL PLANNING AND CONTROL

The operation of the site and operations are conducted in a controlled way by identifying what types and levels of controls are needed where and for what purpose. The relevant procedures list the steps taken to prevent or minimise risks to the environment from the process. Relevant staff and other interested parties will have access to all the documents they need and understand that to operate effectively the processes making up the EMS must be carried out as planned.

The operational controls consist of procedures, work instructions, physical controls and use of competent personnel. Types of control are based on the skills and experience of the people carrying out the operation, and its complexity and environmental significance. Steps to determine controls include choice of method and operating criteria (e.g. measurements, features on the plant), writing down how processes should be planned, carried out and controlled, designing documents such as records and reports and applying technological options such as automated systems and software.

Operational controls include, but are not limited to: tailings deposition management, water level monitoring within the MWF, inspection of bunded chemical storage areas, effluent quality monitoring prior to discharge under EPR/DB3290RH and EPR/JB3209MD, Low Frequency Noise (LFN) and noise mitigation management measures and management of process reagents.

The controls will be monitored to check they continue to be effective, and action is taken if there are changes or improvements to be made.

Maintenance of all tanks, bunds, connections, plant, etc. is carried out according to the manufacturer's or supplier's recommendations using the appropriate instructions, guidelines, and manuals.

Contingency plans are in place for a robust response to minimise the impact on the environment of any breakdowns, enforced shutdowns and any other changes in normal operations, for example due to flooding or other extreme weather based on climate change knowledge and trends.

12 EMERGENCY PREPAREDNESS AND RESPONSE

To ensure a comprehensive response to any emergency, consideration is given to the initial environmental impact and the secondary environmental impact that could result, e.g., fighting a fire can lead to water and air pollution.

The scale of accident management covers incidents from spillages of chemicals or failure of emission abatement equipment to large-scale events such as floods that could endanger humans and the environment to a broader extent.

The Accident Management Plan details incidents or events that could result in pollution, including the likelihood of an accident occurring and the potential consequences, measures to avoid the accident happening in the first place, and corrective actions in the event an accident does take place. The following potential accidents have been considered as a minimum:

- Breach of Environmental Permit;
- Equipment breakdowns;
- Enforced shutdown of the MPF;
- Fires;
- Vandalism;
- Flooding; and
- Extreme weather based on climate change knowledge and trends such as heat waves, hot days, and storms.

Accidents will be recorded, including any investigation and response.

Additionally, Tungsten West has established, implemented and maintains a procedure to identify potential emergency situations and potential accidents that can have an impact on the environment. The Emergency Preparedness and Response Plan details how the company will respond to emergencies, preventing or mitigating any associated environmental impacts. This emergency plan is reviewed every year and if required will be revised after the occurrence of accidents or emergency situations.

To assist staff in the event of an accident, a record form, and a list of emergency contacts and how to reach them will be included in the Plan, together with an up-to-date list of substances stored at the site with the type of storage facility used.

All Accident and Emergency plans will be reviewed regularly.

13 MONITORING AND MEASUREMENT

Various monitoring and measurement plans are in place to analyse and evaluate the environmental performance of the plant and associated site aspects. The environmental risks, compliance obligations and operational controls are considered when determining how monitoring and measurement will be carried out and how it will be recorded and communicated. Results are used to identify nonconformances (e.g., triggers that indicate a permit limit may be breached), look at performance trends and find opportunities for improvement.

Tungsten West operate a series of Environmental Management Plans which monitor and measure the key environmental characteristics of the operations at Hemerdon Mine.

14 INTERNAL AUDIT

A process has been established to evaluate the extent to which the businesses compliance obligations are fulfilled, by conducting regular internal audits and providing information to management on the performance of the EMS.

The internal audit program will be based on the environmental risks and opportunities, the results of previous audits, monitoring and measurement results, and management reviews. Audit findings are captured in a report including action lists and action close-outs where appropriate. Tungsten West will ensure that internal audits of the EMS are conducted annually.

14.1 Evaluation of Compliance

Tungsten West will ensure that a compliance review of the legal obligations and commitments is carried out on an annual basis as a minimum. It is the responsibility of the Environmental Manager to ensure that these reviews are undertaken and recorded.

The compliance review includes an evaluation of compliance status linked to each significant environmental aspect, incorporating (where appropriate) records or evidence to support any compliance decision. A summary of changes will be provided for the management review meeting. Decisions regarding the effective communication of these changes will be made at the management review meeting.

14.2 Nonconformity, Corrective Action, and Preventive Action

Tungsten West has established and implemented a procedure for dealing with nonconformities, and for taking corrective and preventive action. Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.

15 MANAGEMENT REVIEW

Management reviews that include the environment on the agenda will be held at least annually to check compliance with the Environmental Permits and EMS. There will be an annual environmental management review with a fixed agenda to review the year's environmental compliance, suitability of the procedures and the adequacy and effectiveness of the EMS in achieving environmental improvements. This enables decisions on priorities and resources for the EMS to be balanced with other business priorities and resource needs.

The EMS will be reviewed and updated under the following circumstances:

- Changes made to the site, operations or equipment that affect permitted activities;
- After any accident, complaint, or breach of permit; and
- After identification of a new environmental problem or issue with new control measures.

A record of changes to the EMS will be kept, including the following:

- New abatement or process equipment; and
- Implementation of significantly new or different control measures.

16 IMPROVEMENT

Improvement opportunities will be identified from the following EMS processes:

- Communication with interested parties including staff, customers, and the authorities;
- Monitoring and measurement;
- Analysis of data and information relating to environmental performance;
- Evaluation of compliance obligations;
- EMS audits; and
- Management reviews.

The detection of non-conformities such as potential Permit breaches or procedures not being followed is critical to improvement.

In the event of a non-conformity, an investigation will be carried out to determine where the EMS needs improving, and action will be taken to make the appropriate changes and eliminate the cause where possible so the incident will not re-occur. Changes are communicated to relevant staff.

Improvement findings from all sources will be fed back into the Plan-Do-Check-Act cycle for continual improvement.

17 SITE CLOSURE AND DECOMMISSIONING

Site closure and decommissioning of the site has been detailed within the site's full EMS. The Closure Plan includes measures for removal of process chemicals, decontamination of plant and infrastructure, management of residual wastes, long-term monitoring of the MWF, and restoration in accordance with planning permissions and the approved Restoration Scheme.

A site closure plan will be maintained that demonstrates that the site can be decommissioned to avoid any pollution risk and return the site to a satisfactory state. The plan will be updated if any changes are made to the site.

When the time comes to surrender the permit, a closure and decommissioning plan will be provided to the Environment Agency demonstrating how the site will be returned to a satisfactory state with no long term pollution issues.