AUTONOMA

Automation Made To Measure

Environmental and Sustainability Policy

Environmental and Sustainability Policy

AUT-CORP-PO-EN-0001 | Revision 1 | 04 Aug 2026

Revision History				
Rev	**Date**	**Summary of Changes**	**Author**	**Approved**
0	12-Apr-25	Original issue	John Ha	Adrian Krop
1	04-Aug-26	Reissued in the AUTONOMA controlled-document template. Aspects and impacts, waste, spill, resource use and take-back sections added.	Adrian Krop	John Ha

DOCUMENT CONTROL

Document number	AUT-CORP-PO-EN-0001
Document title	Environmental and Sustainability Policy
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Discipline	Environment
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CHANGES IN THIS REVISION

- Reissued in the AUTONOMA controlled-document template and assigned document number AUT-CORP-PO-EN-0001.
- Legislative references corrected to the Environmental Protection Act 1986 (WA) and the Biodiversity Conservation Act 2016 (WA), with ISO 14001:2015 identified as a reference framework only. AUTONOMA is not certified to ISO 14001.
- Definitions section added.
- Responsibilities restated by role against the standard AUTONOMA role set, replacing the reference to a leadership team.
- New sections added for environmental aspects and impacts, the waste hierarchy and segregation, chemical and hydrocarbon spill prevention and bunding, water and energy use, emissions and air quality, packaging and end-of-life equipment take-back, sustainable procurement, and land disturbance, biodiversity and heritage on client sites.
- Environmental incident reporting and environmental emergency response requirements added, with reporting timeframes.
- Training and Competency, and Monitoring, Records and Review sections added, including a records and retention table.

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1 PURPOSE

Autonoma Technology Pty Ltd (AUTONOMA) assembles, installs, commissions and services laboratory automation equipment in its own workshop and warehouse and on client laboratory, industrial and mine sites. That work uses chemicals, hydrocarbons, energy, water and packaging, and generates waste and end-of-life equipment. This policy exists so that AUTONOMA work causes no unauthorised discharge, no avoidable waste and no lasting harm to land, water, air, biodiversity or heritage.

It sets the requirements AUTONOMA applies to identifying its environmental aspects and impacts, controlling them, meeting its legal obligations, using resources efficiently, and reporting and improving its environmental performance.

2 SCOPE

This policy applies to all AUTONOMA workers, contractors, suppliers and visitors, and to every activity AUTONOMA carries out or controls, at every AUTONOMA office, workshop, warehouse and vehicle, and on every client site where AUTONOMA works. It covers laboratory automation work and work on mining sector projects.

It applies across the life of an AUTONOMA deliverable, from procurement and packaging through installation, servicing and end-of-life recovery.

Where AUTONOMA works on a client site, the client's environmental management system and site environmental conditions take precedence where they are more stringent than this policy. Where they are less stringent, this policy applies. Environmental aspects that are wholly owned and controlled by the client, including the client's own process emissions, effluent and waste streams, remain the client's responsibility, and AUTONOMA requirements apply only to what AUTONOMA brings, uses, disturbs or generates.

3 DEFINITIONS

Term	Meaning
Environmental aspect	An element of an AUTONOMA activity, product or service that can interact with the environment.
Environmental impact	A change to the environment, adverse or beneficial, that results wholly or partly from an environmental aspect.
Waste hierarchy	The order of preference for managing waste: avoid, reduce, reuse, recycle, recover energy, treat, then dispose.
Controlled waste	Waste that is prescribed as controlled waste under the Western Australian controlled waste regulations and may only be transported by a licensed carrier under a tracking form.
Bunding	A containment structure sized to retain a spill from the vessels it surrounds and prevent release to land, drains or waters.

Term	Meaning
Environmental incident	Any unplanned event that has caused or could have caused an environmental impact, including a spill, a discharge, a dust or noise exceedance, a fauna strike, unauthorised clearing and disturbance of a heritage item.
Environmental Management Plan (EMP)	The site-specific or project-specific document that applies this policy to a defined location, scope and set of environmental conditions.
Environmental Action Register	The register in which environmental corrective and improvement actions are recorded and tracked to closure.
Product stewardship	Taking responsibility for the environmental impact of a product across its life, including its packaging and its end of life.
Land disturbance	Any clearing, excavation, trenching, drilling, levelling or ground penetration.
Reportable incident	An environmental incident that legislation, a licence, a client contract or a site environmental condition requires to be notified to the regulator or the client.

4 POLICY STATEMENT

AUTONOMA conducts its operations so as to protect the environment, promote sustainability and comply with the applicable environmental legislation, licence conditions and client standards. AUTONOMA will:

1. Comply with the Environmental Protection Act 1986 (WA), the Biodiversity Conservation Act 2016 (WA), all other applicable environmental legislation, and every licence, approval and client site environmental condition that applies to the work, and treat those requirements as the minimum standard rather than the target.
2. Identify the environmental aspects and impacts of its activities, assess their significance, and control the significant aspects before the work starts.
3. Prevent pollution. Cause no unauthorised discharge to land, stormwater, sewer, surface water, groundwater or air.
4. Apply the waste hierarchy to every waste stream, avoiding and reducing waste in preference to recycling it, and recycling in preference to disposing of it.
5. Bund, label and segregate every chemical and hydrocarbon store, and hold spill response equipment matched to what is stored, at every location where those materials are held.
6. Measure and reduce the energy, water and material intensity of its operations, and reduce the greenhouse gas emissions within its control.
7. Take back and responsibly recover the packaging AUTONOMA supplies and the equipment AUTONOMA removes from service, where the client agrees.
8. Apply lifecycle thinking and environmental criteria to the selection of products, equipment, materials and suppliers, and require suppliers and subcontractors to demonstrate environmental management arrangements that align with this policy.
9. Protect biodiversity, avoid unnecessary land disturbance, and stop work immediately where a heritage item, artefact or place of significance is encountered.

10. Report, record and investigate every environmental incident and near miss, including every spill regardless of volume, and notify clients and regulators where required.
11. Integrate sustainability into strategic planning, project planning and daily operations, and consider it when selecting travel, freight and logistics arrangements.
12. Engage with clients, suppliers and communities on shared sustainability goals, and share lessons learned across projects and teams.
13. Improve environmental performance continually, using audit findings, incident investigations, performance measures and stakeholder feedback, and invest in technology and methods that improve environmental outcomes.

Any worker may stop work under AUT-CORP-PO-SA-0011 Stop Work Authorisation Policy where an environmental control is missing or ineffective, without fear of reprisal.

AUTONOMA uses ISO 14001:2015 as the reference framework for these arrangements. AUTONOMA does not hold certification to ISO 14001 and does not represent itself as certified. The arrangements are internally audited, reviewed annually and open to client audit.

5 ROLES AND RESPONSIBILITIES

Table 1: Environmental and sustainability responsibilities

Role	Responsibility
Directors	Set the environmental and sustainability objectives, allocate the resources to implement them, and review environmental performance, incidents, audit findings and objective measures at each management review and at least annually.
Managing Director	Approves this policy. Accountable for AUTONOMA's environmental commitments and for any notification to a regulator.
HSEQ Manager	Owns this policy, the aspects and impacts register, the Environmental Action Register and the environmental records. Maintains AUT-CORP-RG-SA-0004 Legal and Other Requirements Register and reviews it at least annually and on any notified change in the law. Investigates environmental incidents, determines whether an incident is reportable, and tracks actions to closure. Reports environmental performance at management review.
Operations Manager	Accountable for environmental controls at the workshop and warehouse, including bunding, chemical and hydrocarbon storage, waste segregation and collection, spill equipment, and the licensing of waste contractors. Approves the disposal route for every waste stream.
Project Manager	Obtains the client's site environmental conditions, permits and approvals before mobilisation, prepares or adopts the site Environmental Management Plan, briefs the crew on it, and reports environmental incidents to the client within the period the contract requires.

Role	Responsibility
Supervisors	Verify before work starts that the environmental controls in the Environmental Management Plan and the permits required are in place. Verify spill kits are present, complete and accessible. Stop work where a control is missing or where a heritage item or unexpected contamination is encountered.
Workers	Follow the environmental controls for the task. Segregate waste as directed. Use drip trays, bunds and spill containment when handling chemicals and hydrocarbons. Report every spill, discharge and environmental near miss immediately, regardless of volume.
Contractors and Suppliers	Comply with this policy and with the site Environmental Management Plan. Demonstrate their own environmental management arrangements before engagement. Hold the licences required to transport or receive waste. Provide the environmental and end-of-life information AUTONOMA requests for products supplied.
Visitors	Comply with signage, waste segregation arrangements, escort requirements and site directions.

6 LEGAL AND OTHER REQUIREMENTS

The HSEQ Manager maintains AUT-CORP-RG-SA-0004 Legal and Other Requirements Register, which records the environmental legislation, regulations, licence conditions, client standards and other requirements that apply to AUTONOMA, and the AUTONOMA document or control that satisfies each one.

The register is reviewed at least annually, and additionally whenever AUTONOMA enters a new jurisdiction, takes on a new type of work, or is notified of a change in the law by a regulator, a client or an industry association.

Where a change in the law creates a new obligation, the HSEQ Manager records the change in the Environmental Action Register with an owner and a due date, updates the affected controlled documents, and briefs the affected workers before the obligation takes effect.

Every worker is informed of the environmental obligations that apply to their work through induction and refresher training, as set out in *Training and Competency*.

7 ENVIRONMENTAL ASPECTS AND IMPACTS

The HSEQ Manager maintains an aspects and impacts register that records, for each AUTONOMA activity, the environmental aspect, the potential impact, the normal and abnormal operating conditions and reasonably foreseeable emergency conditions, the significance rating, and the control applied.

Significance is assessed under AUT-CORP-PR-SA-0001 Risk Management Procedure, taking account of the scale and severity of the impact, the sensitivity of the receiving environment, the legal or licence obligation attaching to the aspect, and the concerns of the client and the community.

The register is reviewed at least annually, and before any new activity, new chemical, new site type or new item of plant is introduced.

Table 2: Principal AUTONOMA environmental aspects

Activity	Aspect	Potential impact
Workshop assembly and panel build	Metal, cable, plastic and packaging waste; solvent and aerosol use	Landfill burden; air emissions; contamination from poor segregation
Chemical and hydrocarbon storage and handling	Spill or leak of chemicals, oils, coolants and fuels	Soil and groundwater contamination; discharge to stormwater
Installation and servicing on client sites	Waste oils, filters, consumables, cleaning agents, used seals and reagents	Contamination; incorrect disposal of controlled waste
Equipment operation and testing	Energy consumption; water consumption for flushing and cleaning	Greenhouse gas emissions; depletion of a constrained resource
Transport, freight and travel	Fuel combustion; packaging from freight	Greenhouse gas emissions; landfill burden
Packaging supplied with equipment	Timber crating, foam, plastic film, strapping	Landfill burden; litter
Equipment removed from service	Electronic waste, batteries, lamps, refrigerant-bearing components	Hazardous waste to landfill; ozone-depleting or high global warming potential release
Land disturbance on client sites	Excavation, trenching, penetration, laydown areas	Habitat disturbance; erosion; disturbance of heritage or unexpected contamination
Emergency conditions	Fire involving chemicals, failure of bunding, vehicle incident	Uncontrolled release to land, water or air

8 OPERATIONAL CONTROLS

AUTONOMA applies the following controls to the significant aspects identified.

14. A site-specific or project-specific Environmental Management Plan is prepared or adopted before mobilisation for any work involving land disturbance, chemical or hydrocarbon storage on site, generation of controlled waste, or work in or adjacent to a watercourse, wetland or conservation area. The Project Manager prepares it and the HSEQ Manager approves it.
15. A risk assessment and a Safe Work Method Statement are completed for any activity with a significant environmental aspect, under AUT-CORP-PR-SA-0001 Risk Management Procedure, and cover the environmental controls as well as the safety controls.

16. A permit is obtained before hot work, confined space entry, ground disturbance or the handling of a hazardous substance in an area where a release could reach land, drains or waters. The permit records the environmental controls in place and the person who verified them.
17. Environmental controls verified before work starts are recorded on the pre-start record for the task, and the Supervisor signs that record.
18. Where a control cannot be established, the work does not start and the matter is escalated to the Project Manager and the HSEQ Manager.

9 WASTE MANAGEMENT

Waste is managed in the order of the waste hierarchy. Avoidance and reduction are addressed at design, procurement and packaging specification stage, before the waste exists.

AUTONOMA segregates waste at the point of generation into, at a minimum, general waste, commingled recycling, scrap metal, cardboard and timber, electronic waste, batteries, and hazardous or controlled waste. Bins are labelled and located so that segregation is the easy option, and are inspected weekly by the Operations Manager for cross-contamination.

Hazardous and controlled waste is stored in closed, labelled, compatible containers in a bunded area, segregated by compatibility as required by AUT-CORP-PO-SA-0002 Chemical Safety Policy, and removed only by a carrier licensed to transport that waste stream. The Operations Manager verifies the carrier's licence and the receiving facility's licence before the first collection and at least annually afterwards.

Controlled waste movements are accompanied by the tracking form the Western Australian controlled waste regulations require. Waste consignment notes, tracking forms and disposal certificates are retained as records and are provided to the client where the contract requires it.

Waste is never buried, burnt, discharged to a drain or sewer, or left on a client site for the client to dispose of, unless the client has agreed in writing to receive it into a nominated licensed waste stream.

Waste volumes or weights by stream are recorded from contractor collection dockets and reported at management review at least annually, so that reduction can be measured rather than asserted.

10 CHEMICAL AND HYDROCARBON MANAGEMENT AND SPILL PREVENTION

Chemicals, oils, fuels, coolants and other hydrocarbons are stored in bunded areas with a containment capacity of at least the volume of the largest container plus ten per cent, away from drains, watercourses and traffic routes, on an impervious surface, and labelled and registered under AUT-CORP-PO-SA-0002 Chemical Safety Policy.

Bunds, drip trays and containment are inspected monthly by the Operations Manager, and accumulated rainwater in an outdoor bund is tested or visually assessed for contamination before release and is removed as waste where contaminated.

Decanting, transfer and refuelling are carried out over a bund or a drip tray, with a spill kit within reach and the worker in attendance for the whole transfer.

A spill kit matched to the materials held is located at every chemical and hydrocarbon store, in every service vehicle, and at every site work area where those materials are used. Spill kits are inspected monthly and restocked immediately after use.

Every spill is contained at source, cleaned up, and reported under *Environmental Incidents and Emergency Response*, regardless of volume. Contaminated absorbent, soil and rinsate are managed as hazardous or controlled waste. A spill is never hosed to a drain, diluted or covered over.

11 WATER AND ENERGY USE

The Operations Manager records mains water and electricity consumption for the workshop, warehouse and office from utility invoices, and reports consumption and the trend at management review at least annually.

Water used for flushing, cleaning and equipment testing is minimised by using closed-loop or captured-and-reused arrangements where the equipment permits it. Water containing chemicals, coolants or reagents is captured and managed as waste, not discharged to stormwater or sewer without the written approval of the water utility where trade waste consent is required.

Energy use is reduced by shutting down test rigs, compressors, extraction and non-essential equipment when not in use, specifying energy-efficient equipment and lighting when items are replaced, and maintaining plant so that it operates at its designed efficiency.

Vehicle fuel use is recorded and reported. Travel, freight and logistics are planned to consolidate movements, and video conferencing is used in preference to travel where the work does not require attendance.

12 EMISSIONS, AIR QUALITY AND REPORTING

AUTONOMA controls the emissions within its control: dust from cutting, grinding and vehicle movement; welding fume and solvent vapour; exhaust from vehicles and portable plant; and refrigerant from equipment being serviced or decommissioned.

Dust-generating work uses water suppression, extraction or enclosure, and is stopped where visible dust leaves the work area and cannot be controlled. Fume and vapour generating work uses local exhaust ventilation or extraction.

Refrigerant is recovered by a person holding the licence required to handle it, and is never vented. The recovery record is retained.

Greenhouse gas emissions within AUTONOMA's control are estimated from the recorded electricity, fuel and freight data and are reported at management review at least annually. AUTONOMA provides emissions and environmental performance data to clients and regulators

where a contract, licence or legal reporting threshold requires it, and does not publish an emissions claim that cannot be evidenced from those records.

13 PACKAGING, PRODUCT STEWARDSHIP AND END-OF-LIFE EQUIPMENT

AUTONOMA specifies packaging that is reusable, recyclable or recoverable in preference to packaging that is not, and specifies the minimum packaging that will protect the goods in transit, having regard to AUT-CORP-PR-SC-0001 Warehouse Goods Inwards and Outwards Procedure.

Timber crating, pallets, foam and film delivered with AUTONOMA equipment are removed from the client site by AUTONOMA and returned to the workshop for reuse or recycling where the client agrees, rather than being left in the client's waste stream.

AUTONOMA offers, at quotation stage, to take back equipment it removes from service so that it can be reused, refurbished for spares, or dismantled for material and component recovery. Electronic waste, batteries, lamps and refrigerant-bearing components removed from service are directed to a recovery pathway licensed or accredited for that stream, and are not placed in general waste.

Where AUTONOMA takes back equipment, the Operations Manager records the item, its serial number where serialised, the recovery route and the receiving facility.

14 SUSTAINABLE PROCUREMENT AND SUPPLY CHAIN

Environmental criteria are applied when selecting products, materials, equipment and suppliers, alongside technical fitness, quality, safety, cost and delivery. The criteria considered are energy and water efficiency in use, expected service life and repairability, availability of spares, recycled or recyclable content, packaging, the presence of hazardous substances, and the supplier's own environmental arrangements.

Suppliers and subcontractors whose work has a significant environmental aspect are required, before engagement, to demonstrate environmental management arrangements that align with this policy, and to hold any licence their activity requires. Contractors are also assessed under AUT-CORP-PO-SA-0018 Contractor Management Policy.

Purchase orders for chemicals, hazardous materials and controlled waste services state the environmental documentation required, including Safety Data Sheets and licence details, and delivery is not accepted without it.

Supplier environmental performance, including any environmental incident caused by a supplier on an AUTONOMA or client site, is recorded against the supplier and reviewed at management review.

Sustainable procurement decisions are made consistently with AUT-CORP-PO-CS-0006 Modern Slavery Policy, so that an environmental improvement is not obtained at the cost of a human rights harm.

15 LAND DISTURBANCE, BIODIVERSITY AND HERITAGE ON CLIENT SITES

Before any ground disturbance, the Project Manager obtains from the client the approved clearing or disturbance permit, the site heritage and environmental clearance for the work area, the location of underground services, and the boundaries of any exclusion, conservation, rehabilitation or heritage area. Work does not start until those are held and the boundaries are marked on the ground.

Disturbance is confined to the approved footprint. Vehicles, laydown areas and access tracks stay on established surfaces. Topsoil removed is stockpiled separately for reinstatement.

Where a heritage item, artefact, human remains, skeletal material, rock art or place of apparent cultural significance is encountered, work stops immediately in that area, the area is left undisturbed, and the Project Manager notifies the client and the HSEQ Manager. Work does not resume in that area until the client confirms in writing that it may.

Where unexpected contamination, buried waste, asbestos or an unrecorded service is encountered, work stops immediately, the area is isolated, and the Project Manager notifies the client and the HSEQ Manager.

Native fauna is not handled, fed, disturbed or harmed. Fauna encountered in a work area is reported to the client's environmental representative and the work is relocated or delayed until the animal moves of its own accord or is relocated by a person authorised to do so. Weed and pathogen spread is controlled by cleaning vehicles, plant and footwear as the site conditions require.

16 ENVIRONMENTAL INCIDENTS AND EMERGENCY RESPONSE

Every environmental incident and near miss is reported by the worker who identifies it to the Supervisor immediately, and by the Supervisor to the Project Manager and the HSEQ Manager before the end of that shift.

The immediate response is to make the area safe, stop or contain the release at source, protect drains, watercourses and soil, and prevent the release from spreading. Cleanup follows containment.

The HSEQ Manager determines within one working day whether the incident is reportable to a regulator or the client, and the Managing Director makes any notification to a regulator. Where a site environmental condition or contract specifies a shorter notification period, that period applies.

Environmental incidents are recorded and investigated under AUT-CORP-PR-SA-0003 Incident Reporting and Investigation Procedure, in AUT-CORP-RG-SA-0001 Incident Register, with the root cause determined and the corrective action verified as effective before closure. Corrective and improvement actions are tracked in the Environmental Action Register.

Environmental emergency scenarios, including a major spill, a fire involving chemicals and a failure of containment, are addressed in AUT-CORP-PL-SA-0002 Emergency Response Plan and exercised at least annually.

17 STAKEHOLDER ENGAGEMENT AND CONTINUAL IMPROVEMENT

AUTONOMA engages with clients, suppliers and the communities affected by its work on shared sustainability goals, responds to environmental concerns raised by any stakeholder, and records the concern and the response.

Lessons learned from environmental incidents, audits and projects are shared across projects and teams through toolbox talks and the HSEQ communication used for safety alerts, so that the same lesson is not learned twice.

Improvement is driven from four sources: environmental incidents and their root causes, internal and client audit findings, the environmental performance measures reported at management review, and stakeholder feedback. Each improvement action recorded in the Environmental Action Register has a named owner, a due date and a defined outcome, and is tracked to closure by the HSEQ Manager. An overdue action is escalated to the Directors with a revised date and a reason.

18 TRAINING AND COMPETENCY

Every worker receives environmental awareness training at induction, covering this policy, the environmental aspects of AUTONOMA work, waste segregation, spill prevention and response, the requirement to report every spill and near miss, and the legal obligations that apply to their work.

Workers who handle chemicals, hydrocarbons, hazardous waste or controlled waste, or who respond to spills, complete additional training in spill containment and cleanup and in the use of the spill equipment held at their location, before performing that work. Competency is verified by the Supervisor before unsupervised work.

Workers who carry out ground disturbance receive a briefing on the approved footprint, the exclusion and heritage areas, the underground services, and the stop-work requirement for an unexpected find, before the disturbance starts.

Refresher training is completed at least every two years, and whenever this policy, a site Environmental Management Plan, a licence condition or the applicable legislation changes. Training is delivered and recorded under AUT-CORP-PR-HR-0002 Skills and Development Procedure, with induction under AUT-CORP-PR-HR-0001 Onboarding and Training Procedure.

19 MONITORING, RECORDS AND REVIEW

Environmental performance is monitored through documented workplace inspections of the workshop, warehouse and chemical and waste storage areas at least monthly, documented site environmental inspections at the frequency stated in the Environmental Management Plan and at least monthly while work is in progress, review of the Environmental Action Register, review of environmental incidents and near misses, review of the recorded waste, water, energy and fuel data, and internal audit under AUT-CORP-PL-SA-0001 Health, Safety, Environment and Quality Management Plan.

Table 3: What is measured

Measure	Source of data	Reported
Environmental incidents and near misses, by type and severity	AUT-CORP-RG-SA-0001 Incident Register	Each management review
Spills reported, and volume contained and recovered	Incident records	Each management review
Reportable incidents notified within the required period	HSEQ Manager's notification records	Each management review
Waste by stream, and the proportion diverted from landfill	Waste contractor collection dockets and tracking forms	At least annually
Electricity, mains water and vehicle fuel consumption	Utility and fuel invoices	At least annually
Greenhouse gas emissions within AUTONOMA's control	Estimated from energy, fuel and freight records	At least annually
Packaging and equipment taken back and recovered	Take-back records held by the Operations Manager	At least annually
Environmental Action Register items closed and overdue	Environmental Action Register	Each management review
Environmental inspection and audit findings closed	Inspection and audit records	Each management review
Suppliers with demonstrated environmental arrangements	Supplier assessment records	At least annually

Non-compliance with this policy is raised as a corrective action in the Environmental Action Register with a named owner and a due date, and is tracked to closure. Deliberate or repeated non-compliance is managed under AUT-CORP-PO-CS-0002 Code of Conduct.

Table 4: Environmental records and retention

Record	Held by	Retention
Aspects and impacts register	HSEQ Manager	Current version live; superseded versions 7 years
Legal and Other Requirements Register	HSEQ Manager	Current version live; superseded versions 7 years
Site and project Environmental Management Plans	Project Manager	7 years after completion
Permits for hot work, ground disturbance and confined space	Project Manager	7 years
Environmental inspection records	Operations Manager	7 years
Waste consignment notes, controlled waste tracking forms and disposal certificates	Operations Manager	7 years
Waste contractor and receiving facility licence verifications	Operations Manager	7 years
Bund, drip tray and spill kit inspection records	Operations Manager	7 years

Record	Held by	Retention
Refrigerant recovery records	Operations Manager	7 years
Energy, water, fuel and freight consumption data	Operations Manager	7 years
Environmental incident reports and investigations	HSEQ Manager	7 years, or 30 years where contamination of land or water occurred
Regulator and client notifications	Managing Director	7 years
Take-back and end-of-life recovery records	Operations Manager	7 years
Training and competency records	HSEQ Manager	7 years after separation
Environmental Action Register	HSEQ Manager	7 years after closure of the item

Records are controlled, stored, protected and disposed of under AUT-CORP-PR-QA-0001 Document and Data Control Procedure.

This policy is reviewed annually, and additionally whenever the environmental legislation or a licence condition changes, AUTONOMA begins a new type of work or enters a new jurisdiction, a reportable environmental incident occurs, or an audit finding indicates the policy is not effective. The HSEQ Manager owns the review and the Managing Director approves each revision.

20 REFERENCES

20.1 Legislation and Standards

Reference	Subject
Environmental Protection Act 1986 (WA)	Pollution, unauthorised discharge, waste and environmental harm
Environmental Protection Regulations 1987 (WA)	Prescribed premises, noise and general environmental controls
Environmental Protection (Unauthorised Discharge) Regulations 2004 (WA)	Discharge of prescribed materials to the environment
Environmental Protection (Controlled Waste) Regulations 2004 (WA)	Carriage, tracking and disposal of controlled waste
Waste Avoidance and Resource Recovery Act 2007 (WA)	Waste avoidance, resource recovery and the waste hierarchy
Biodiversity Conservation Act 2016 (WA)	Native flora and fauna, and biodiversity conservation
Aboriginal Heritage Act 1972 (WA)	Aboriginal sites, artefacts and places of significance
Contaminated Sites Act 2003 (WA)	Reporting of known or suspected contamination
Recycling and Waste Reduction Act 2020 (Cth)	Product stewardship and packaging
National Greenhouse and Energy Reporting Act 2007 (Cth)	Greenhouse gas and energy reporting, where a reporting threshold applies

Reference	Subject
Work Health and Safety Act 2020 (WA)	Duties where an environmental control is also a safety control
Work Health and Safety (General) Regulations 2022 (WA)	Hazardous chemicals, storage and handling
Work Health and Safety (Mines) Regulations 2022 (WA)	Work on mine sites
Australian Code for the Transport of Dangerous Goods by Road and Rail	Transport of chemicals and hazardous waste
ISO 14001:2015	Environmental management systems, used as the reference framework. AUTONOMA is not certified to ISO 14001
ISO 31000:2018	Risk management

20.2 AUTONOMA Documents

Document number	Title
AUT-CORP-PO-CS-0001	AUTONOMA General Policy
AUT-CORP-PO-CS-0002	Code of Conduct
AUT-CORP-PO-CS-0006	Modern Slavery Policy
AUT-CORP-PO-QA-0001	Quality Policy
AUT-CORP-PO-SA-0001	Health and Safety Policy
AUT-CORP-PO-SA-0002	Chemical Safety Policy
AUT-CORP-PO-SA-0011	Stop Work Authorisation Policy
AUT-CORP-PO-SA-0018	Contractor Management Policy
AUT-CORP-PL-SA-0001	Health, Safety, Environment and Quality Management Plan
AUT-CORP-PL-SA-0002	Emergency Response Plan
AUT-CORP-PR-QA-0001	Document and Data Control Procedure
AUT-CORP-PR-SA-0001	Risk Management Procedure
AUT-CORP-PR-SA-0003	Incident Reporting and Investigation Procedure
AUT-CORP-PR-SC-0001	Warehouse Goods Inwards and Outwards Procedure
AUT-CORP-PR-HR-0001	Onboarding and Training Procedure
AUT-CORP-PR-HR-0002	Skills and Development Procedure
AUT-CORP-WI-QA-0001	Standard Work Instruction - Equipment Installation, Commissioning and Servicing
AUT-CORP-RG-SA-0001	Incident Register
AUT-CORP-RG-SA-0002	Hazardous Chemicals Register
AUT-CORP-RG-SA-0004	Legal and Other Requirements Register

20.3 External Guidance

Reference	Subject
Department of Water and Environmental Regulation (WA), guidance on controlled waste and unauthorised discharge	Waste tracking, licensing and discharge obligations
Department of Water and Environmental Regulation (WA), Water Quality Protection Notes	Storage and handling of chemicals and hydrocarbons near water resources
Australasian Recycling Label and the Australian Packaging Covenant sustainable packaging guidelines	Packaging design and recyclability, used as a design reference
Safe Work Australia, Code of Practice: Managing risks of hazardous chemicals in the workplace	Chemical storage, bunding and spill response
National Greenhouse Accounts Factors, Commonwealth of Australia	Emission factors used when estimating greenhouse gas emissions

APPROVAL

Prepared by	Reviewed by	Approved by
Adrian Krop Director Date: 04-Aug-2026	Adrian Krop Director Date: 04-Aug-2026	John Ha Managing Director Date: 04-Aug-2026