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SUSTAINABILITY
REPORT 2020



METRO
MINING
LIMITED

Metro Mining Limited is an Australian exploration and mining company based in Brisbane, Queensland. This Sustainability Report offers an account of our contributions to sustainable development and complements Metro's Annual Report.

Metro's flagship project, the Bauxite Hills Mine, is located 95Km north of Weipa. The Company holds a total tenement package covering approximately 1,900sq km on Western Cape York. The Bauxite Hills Mine is a single operating mine combining two Environmental Authorities covering the Bauxite Hills and Skardon River tenements.

Metro's Bauxite Mine ore is shipped to meet China's growing bauxite market; where Cape York bauxite is well known and highly regarded.

In October 2019 Metro announced completion of the Definitive Feasibility Study for Stage 2 Expansion of the Bauxite Hills Mine confirming the economic benefits of expanding the mine to an annualised rate of 6.0 Million Wet Metric Tonnes (WMT).

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Cultural Disclaimer:
Aboriginal & Torres Strait Islander persons are warned that this website may contain images and/or names of deceased indigenous persons or sites of cultural significance.

Metro's Stage 2 Expansion remains the core strategy for the long-term future of Bauxite Hills. Timing for the formal commitment to Stage 2 remains influenced by economic conditions across the aluminium supply chain.

Metro also holds thermal coal resources in Queensland's Surat Basin. As the company focus is bauxite there was no exploration or field work undertaken on the coal holdings in 2020. All coal tenements are in good standing and Metro is actively seeking opportunities to create value from these assets.

The Sustainability Report complements, and should be read in conjunction with, information contained in the Annual Report and Corporate Governance Statement, both available at www.metromining.com.au

For more information about our company activities please see our website www.metromining.com.au

INTEGRATED SUITE OF ANNUAL REPORTING

Annual Report

Sustainability Report

Corporate Governance Statement

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1. MANAGING DIRECTOR'S MESSAGE

Metro's 2020 Performance highlights are detailed within this Sustainability Report. This is our second report since commencing mining operations in 2018 at the Bauxite Hills Mine, north of Weipa on Western Cape York.

Annual Sustainability Reporting is now an integral component of Metro's resolve to be open and accountable in relation to our company's operations. I believe it clearly demonstrates we have a commitment to sustainable development.

Sustainable development is driven, in part, by a company's Vision and Values.

Metro's Core Values are:

- Respect each other and the environment in which we work;
- Be safe in everything we do;
- Trust each other to do the right thing every time;
- Build integrity and ethics into all our business decisions;
- Continuous improvement will deliver efficiency and create opportunity.

Mining is our business and sustainable development is an essential part of that business. We believe neither can effectively exist without the other.

The report also lists our ongoing and growing sustainable priorities that confirm our determination to achieve results. We share these priorities with our team members, contractors, Government and stakeholders.

I am particularly proud of our growing reputation for employing and buying locally. I am also proud of our achievements over the past year in the broader social, environmental and economic environments.

The year 2020 covered by this Sustainability Report was a very difficult year. COVID -19 affected communities and business throughout the world. Metro's operations were also adversely affected and, due to the ramifications of the pandemic on our industry, we had to bring forward our wet season shutdown.

In spite of the challenges we faced during 2020, we maintained our sustainable development focus. In the year ahead, as operations return to normal, I feel sure we will continue on our journey to increase our sustainable future in the best interests of all concerned.

I thank our Metro community for the support we have received throughout the year.

Simon Finnis
Managing Director & CEO
16 March 2021

2. METRO'S VISION & CORE VALUES



3. COVID - 19

On 11 March 2020, the World Health Organization Director-General declared the outbreak of COVID-19 a global pandemic. Metro Mining immediately implemented a range of strategies to mitigate the risks posed by COVID-19 which included Policies and Procedures relating to travel, personal protective equipment and work procedures. All Policies and Procedures were strictly enforced to minimise risk to Metro employees, contractors and our local communities. There were zero cases of COVID-19 reported across Metro's operations in 2020.

We are proud of the early, rapid response implemented to the emerging risk of COVID-19 and sought to establish Policies and Procedures which generally exceeded the advice of the Government and industry.

Directives implemented by Metro during this period included, but were not limited to:

- Strict hygiene rules on and off-site
 - Specific personal protective equipment;
 - Temperature testing of all employees prior to returning to site;
 - Termination of Fly-in/Fly-out arrangements into biosecurity areas;
 - Cessation of domestic and international travel.

An area of particular focus was the health of people within the remote communities from which we draw our employees. Employees from affected areas were offered the option of relocating to Cairns and receiving a living-away-from home allowance or being temporarily stood down to allow eligibility to access COVID-19 Government subsidies.

Due to ongoing international travel restrictions Metro's marketing and sales program was impacted and resulted in the decision to go into an early shutdown of the Bauxite Hills Mine in mid-September. The early wet season shutdown, unfortunately, necessitated redundancies at the mine site, the Cairns office and Brisbane corporate office.

COVID-19 continues to be a rapidly evolving situation and Metro's procedures are being continually monitored and updated by Senior Executives, Health & Safety Professionals, HR and IT teams.

Operations at the mine are scheduled to recommence after the wet season in April 2021 with the Metro Board believing confidence is returning to the sector.

4. SUSTAINABILITY PRIORITIES

GOVERNANCE

RISK MANAGEMENT

- Target:**
- Risk management processes and systems consistent throughout the Company
 - Increased risk maturity
- 2020 Progress**
- Increased consistency and maturity of the risk management framework
- 2021 Planned Activities:**
- Further definition to risk appetite
 - Enhancement of operating risk identification and recording

EMS

- Target:**
- Environmental Management System (EMS)
- 2020 Progress:**
- Implementation Plan developed for EMS for corporate structure
- 2021 Planned Activities:**
- Develop Implement corporate EMS

ORGANISATIONAL GOVERNANCE

- Target:**
- No breaches of core values or Board approved policies
 - Corporate Governance framework aligned with better practice
- 2020 Progress:**
- No breaches of core values
 - Board approved policies
 - Alignment with the ASX 4th Edition principles and recommendations
- 2021 Planned Activities:**
- Training and awareness of the updated Code of Conduct

HEALTH & SAFETY

OH&S

- Target:**
- No injuries or significant incidents
 - No fatalities or significant incidents
- 2020 Progress:**
- Zero LTI or fatalities
 - No Reportable safety Incident
 - Rapid COVID response and Policies & Procedures implemented
- 2021 Planned Activities:**
- Continuous improvement

ENVIRONMENT

MINE REHABILITATION

- Target:**
- Progressive rehabilitation
- 2020 Progress:**
- Rehabilitation target achieved
 - Rehab trials & monitoring commenced
- 2021 Planned Activities:**
- Rehabilitate 100 ha
 - Refine Rehab Monitoring against Completion Criteria

KAOLIN MINE REHABILITATION

- Target:**
- Rehabilitate inherited mine pit and stockpiles
- 2020 Progress:**
- Rehabilitation deferment approved by DES
- 2021 Planned Activities:**
- DES to confirm new Rehabilitation Program
 - Complete approved Rehabilitation Program

WASTE

- Target:**
- Responsible waste disposal
- 2020 Progress:**
- Regulated Waste removed from inherited Kaolin waste
 - Tyre recycler contracted and all tyres transported for recycling
 - Optimising waste processes
 - Further recycling opportunities sourced
- 2021 Planned Activities:**
- Develop large scale composting capability
 - Remove general waste from inherited Kaolin Waste and recycle scrap steel
 - Refine waste reporting and capture of waste stream volumes
 - Initiate another recycling scheme

WATER

- Target:**
- Practise water efficiency
 - Continual water monitoring & water usage volume reporting
- 2020 Progress:**
- Improved sampling regime and procedures
- 2021 Planned Activities:**
- Identify at least 1 opportunity to recycle water
 - Identify additional operational water supply options
 - Identify gaps in water monitoring program and action plan for improvement

BIODIVERSITY

- Target:**
- Implement Commonwealth biodiversity offsets strategy
- 2020 Progress:**
- Finalised contract with research party – University of WA
- 2021 Planned Activities:**
- Finalise DAWE Review of Offset requirements
 - Commence Offsets Strategy in line with DAWE Review

COMPLIANCE

- Target:**
- Ensure compliance with all legal requirements
- 2020 Progress:**
- Monitor compliance
 - Regular environment committee meetings held on site
- 2021 Planned Activities:**
- Complete identified EA Amendments
 - Corporate Audit of Site Compliance
 - Establish Audit Schedule for Contractors
 - Gap analysis and Action Plan for Progressive Rehabilitation and Closure Plan (PRCP)

CLIMATE CHANGE

- Target:**
- Increase understanding of our greenhouse gas emissions
- 2020 Progress:**
- Design work and planning finalised
- 2021 Planned Activities:**
- Undertake Greenhouse Gas emissions review

SOCIAL

COMMUNITY INVESTMENT

- Target:**
- Support local community initiatives that will have long-term positive effect in communities we operate
- 2020 Progress:**
- Baseline local procurement list identified
 - Reviewed and updated sponsorship guidelines
 - Funded arts & writing program for children in community
- 2021 Planned Activities:**
- Develop a detailed list of preferred FNQ and Indigenous suppliers
 - Identify direct sponsorships to meet priority areas / groups

INDIGENOUS ENGAGEMENT

- Target:**
- Promote Indigenous employment opportunities and ongoing engagement
- 2020 Progress:**
- Seed collections ongoing in Mapoon and Injinoo
 - Three LC meetings held
- 2021 Planned Activities:**
- Review target for local community seed collections
 - Review additional options for native seed collections to meet site needs
 - Facilitate three LC Meetings
 - Review AA and CHMA
 - Create Scar Tree Display on site with direction from TO's

EMPLOYEE ENGAGEMENT

- Target:**
- Employees actively demonstrate living the Company's values
- 2020 Progress:**
- Covid Newsletters
 - Regular engagement through early Wet Season Shutdown
- 2021 Planned Activities:**
- Employee engagement survey

DIVERSITY

- Target:**
- To Increase Diversity
- 2020 Progress:**
- Two "Women in Mining" workshops completed
 - Cultural Awareness Training (CAT) completed by Directors employees and contractors
- 2021 Planned Activities:**
- Ongoing CAT program for site
 - Review Pre-Employment Training development

TRADITIONAL OWNER BUSINESSES

- Target:**
- Identify TOB opportunities at the Bauxite Hills Mine
- 2020 Progress:**
- Identified TOB opportunities
 - Tender created for Seed Collections
- 2021 Planned Activities:**
- Work with TOs to develop sustainable business activities

INDIGENOUS EMPLOYMENT

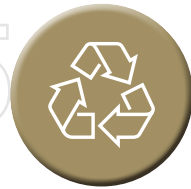
- Target:**
- To employ 25% of workforce Indigenous communities
- 2020 Progress:**
- 27% Indigenous employment
- Planned Activities:**
- Five Traditional Owner Trainees
 - Training programs for TOs
 - 30 % Indigenous Employment
 - Five Traditional Owner Trainees

5. PERFORMANCE HIGHLIGHTS IN 2020



PRODUCTION TARGETS

Contracted Production achieved.



WASTE

Waste processes streamlined and identification of further recycling opportunities.



REHABILITATION

Commitment to seed and fertilize 100 hectares achieved.



WORKFORCE DIVERSITY

Traditional Owners comprises 27%.
Gender representation 33% women.



CULTURAL AWARENESS

Cultural Awareness training to all employees ongoing.



RISK MANAGEMENT

Bauxite Hills risk management processes continued to be strengthened.

An early, rapid and effective response to COVID-19.



SAFETY

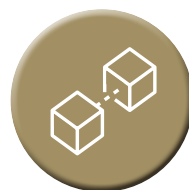
Zero Lost time Injuries.

No reportable safety incidents.



OFFSETS

Research partnership with WA University formalised.



GOVERNANCE:

Alignment with the ASX 4th Edition Principles and Recommendations.

6. GOVERNANCE

6.1 ORGANISATIONAL GOVERNANCE

The Metro Mining Board comprises five members and is supported by the following Committees:

- Audit and Risk Committee
- Remuneration and Nominations Committee

Four members of the Board are Non-Executive Directors including the Chair.

A list of Board members and the Committees they are members of can be found in the Metro Mining Annual Report.

The Board is structured to align Director's skills and experience with the Company's goals and strategic direction. Non-Executive Directors conduct regular meetings without management present which provides a further opportunity for free expression of views and the promotion of good governance.

The functions and responsibilities of the Board and each of the Committees are set out in their respective Charters which can be found on Metro's website www.metromining.com.au. In 2020 the Board Charter and Code of Conduct were reviewed and updated.

Metro is committed to building the business sustainably, operating ethically and safely, minimising the environmental footprint and ensuring good governance and social responsibility. These are all core elements to creating stakeholder value and are at the heart of our strategy.

Our Corporate Governance performance is underpinned by meeting objectives set out in the ASX Corporate Governance Principles and Recommendations. Our Corporate Governance Statement is available in the Corporate Governance section of our website www.metromining.com.au

The 4th edition of the ASX Corporate Governance Principles and Recommendations (www.asx.com.au) came into force for financial years commencing on or after 1 January 2020. Metro have adopted all of these principles to further strengthen our governance.

Metro's commitment to good governance practices, operating ethically and with integrity is guided by a suite of Board approved Policies in relation to the following:

- Community and Social Responsibility
- People and Diversity
- Health and Safety
- Mental Health and Well-being
- Environment
- Anti-bribery and Corruption
- Risk Management
- Continuous Disclosure
- Whistle-blower
- Securities Trading

These Policies are available at: www.metromining.com.au

The Metro Mining Board together with Executive Management are accountable for ensuring the Company operates in accordance with governance principles and in a sustainable manner. Policies and Standards are regularly reviewed to ensure observance to, and maintenance of the highest standards of Corporate Governance. Board and Management review compliance with Policies and Standards throughout the year and all significant incidents are elevated to the Board.

The Audit and Risk Committee assist the Board in identifying, understanding and monitoring risk and sustainability related matters and ensuring appropriate strategies and controls are implemented. In particular, the Committee ensures material risks are identified, objectively assessed and where appropriate risk mitigation actions are effected to reduce residual risk. The Committee also assists the Board in overseeing the internal financial control systems including external audit processes.

The Remuneration and Nominations Committee assists the Board with remuneration matters at all levels, Board appointments and succession planning, as well as diversity and inclusion in the workforce and people/culture strategy.

Management assists all Committees to ensure they have the appropriate level of information and are aware of any material issues. Committees are able to seek independent professional advice if considered appropriate.



6.2 RISK MANAGEMENT

Metro Mining follows an enterprise risk management framework consistent with ISO31000 to identify, evaluate and manage risks. Risk management is a required business practice linked to strategy, business objectives and decision making. Risk activities are integrated across all operating sites, development projects and corporate activities.

Metro identify financial, operational, environmental, health, safety and social risks, then evaluate the inherent risk of an activity and the mitigation required. Risk assessments are updated by operations and management and reported to the Board each month.

The categories of Material Business Risks described in the Directors' Report in the 2020 financial year are:

- Fluctuation in commodity prices and Australian dollar;
- Mineral resources and ore reserves;
- Replacement of depleted reserves;
- Mining risks and insurance risks;
- Production and cost estimates;
- Sovereign risk and concentration of customers;
- Marketing risk;
- Environmental, health, safety and permits (including climate change risk);
- Community relations.

Major organisational governance and risk management achievements in 2020 were;

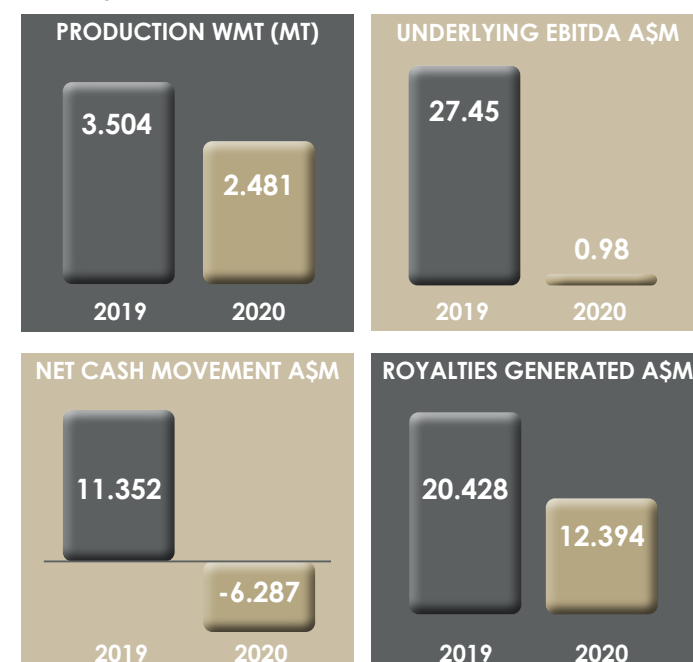
- Metro's Code of Conduct reviewed and updated to align with Metro's Vision and Values. Staff training and education based on the updated Code is currently being prepared for delivery throughout 2021;
- Revisions to 4th edition of the ASX Corporate Governance Principles and Recommendations adopted and implemented;
- Early, rapid response to evolving impact of COVID-19 established and will continue to be strengthened throughout 2021;
- Mine site safety and risk management procedures continued to be strengthened supporting a safety-first culture;
- No incidents of bribery or corruption; adherence by all employed contractors and consultants to Metro's bribery and corruption standards;
- Compliance with key legislation;
- Planning undertaken for adherence to the Modern Slavery Act.

6.3 FINANCIAL PERFORMANCE

Metro Mining's 2020 financial performance has been released to the ASX and is available on our website. COVID-19 had a significant impact on Metro's business. Market conditions across the aluminium supply chain in China meant reduced demand and prices for bauxite and resulted in the Bauxite Hills

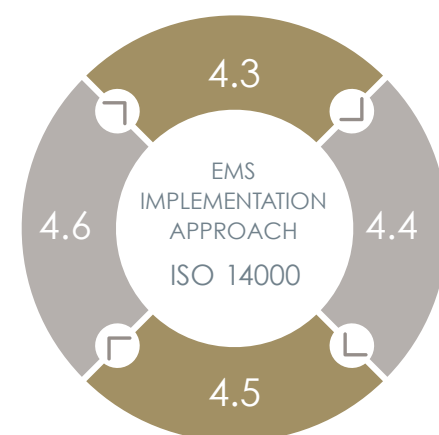
mine transitioning into an earlier than planned wet season shutdown. This negatively impacted bauxite production and overall mine profitability in 2020 compared to 2019.

Despite this, Bauxite Hills Mine performed strongly during its (April -Sept '20) operating period with site production costs 4% lower than 2019 and at their lowest level since mining began in 2018. In addition, production during this period confirmed that existing plant and equipment can operate at a rate greater than 4Mtpa rate. **Key 2020 Financial Metrics are as follows:**



6.4 ENVIRONMENTAL MANAGEMENT SYSTEM

Metro Mining uses a collection of stand-alone corporate and operational procedures and Environmental Management Plans (EMPs) to manage environmental risks, compliance, monitoring, reporting and operations. Metro commenced planning for a coordinated Environmental Management System (EMS) and in 2021 will continue to develop their EMS in accordance with ISO14000 Standards.



4.3 PLAN

- Survey environmental impact and issues.
- Assess environmental activity plans

4.5 CHECK

- Internal audits.
- Corrective and prevention measures

4.4 DO

- Implement environmental activities.
- Build implementation and operating systems.
- Educate employees

4.6 ACT

- Management review of operations & procedures

7. HEALTH AND SAFETY

The health and safety of our people and our contractors will always be the main priority at Metro Mining. The aim is for all people to return home safely after a day's work. Strict adherence to Metro's Health and Safety Policy is an essential requirement for a successful and sustainable operation.

It is part of our practice to review, on a regular basis, the previous operational years with intent to systematically improve and update our Health and Safety procedures.

Effective toolbox talks will always be a strong Metro focus, as pre-shift discussion has proven to be the optimum way to mitigate any risk to workers, and assist communication through the work force. Toolbox Talks are short 10-15 minute daily safety discussions held on-site prior to commencement of each work shift. The objective is to identify risks in the day's activities along with relaying critical safety information and ensuring the team is engaged and focused.

Metro's emphasis in 2020 was safeguarding our workers during the unprecedented COVID-19 pandemic, and the rapidly changing nature of the pandemic, whilst ensuring compliance with all Government regulatory bodies.

In addition the Bauxite Hills Mine Health & Safety Team further developed the mines Health & Safety Governance systems and processes via the Qudos and DAMSTRA platforms Qudos and DAMSTRA were introduced in 2019 when Metro changed to an owner operator business.

Focus in 2020 was on consolidating these processes in readiness for the 2021 operating season.

The Qudos Compliance & Risk Management System monitors and mitigates risk on-site. The on-site management team has undergone Qudos training to conduct hazard identification and action. Subsequently, using the Qudos platform has decreased Lost Time Injuries (LTI's) with zero LTI's recorded in 2020.

Bauxite Hills Mine Health & Safety Statistics	Frequency	
	2019	2020
Serious Accident	1	0
High Potential Incident	1	0
LTI	2	0
Diseases	0	0
Total Recordable Injury Frequency Rate (TRIFR) (TRIFR Industry Standard 13.3)	4.17	0
Lost Time Injury Frequency Rate (LTIFR) (LTIFR Industry Standard 12.2)	4.17	0
Medical Treatment Injuries	2	0
First Aid Injuries	115	49
Near Miss / Damage Incidents	65	124
Total Work hours	514,860	255,854

The DAMSTRA platform monitors Fitness for Work of all employees daily, along with reporting on training and compliance and ensures an accurate account of all personnel on-site, at all times.

All contractors at the Bauxite Hills Mine are required to use Qudos and DAMSTRA and are also monitored and audited, accordingly, to ensure compliance.

To this end, Metro works in closely with the developers of Qudos and DAMSTRA to ensure these platforms provide the best possible outcomes for Metro.

In recognition of the value and importance of mining legislation Metro is already compliant with the Respiratory Health Surveillance Legislation that will be mandatory for all Queensland Mine & Quarry Workers by the end of 2022.

In 2021 Metro aims to eliminate all preventable injuries at Bauxite Hills Mine and maintain our 2020 zero LTI record. In addition, Metro will continue to embed a strong health and safety culture into day-to-day business practices, expand monitoring and audit activities and maintain compliance at all time.





TARGETED FAUNA HABITAT CREATION

- Spreading cleared vegetation over mined areas
- Re-standing some larger hollow-bearing trees
- Installing nesting boxes
- Re-creating natural landform variations

Rehabilitation at Bauxite Hills Mine showing successful establishment of native seed within 12 months.

8. ENVIRONMENT

Metro Mining is committed to maintaining or improving the environmental values in the area in which we operate. Metro's commitment was demonstrated during the challenging conditions presented by the COVID-19 pandemic and the Bauxite Hills Mine early wet season shutdown. Despite these challenges, environmental personnel and resourcing remained in place throughout the year as did Metro's commitment to adhering to environmental standards.

8.1 BAUXITE HILLS MINE

In the third year of production, focus at the Bauxite Hills Mine has been on the refinement and optimisation of the environmental management at the mine. The site environmental team was able to make incremental improvements in a number of areas including:

- Optimising water monitoring procedures to reduce time while maintaining compliance;
- Developing an environmental monitoring and reporting calendar to ensure all State and Commonwealth reports are planned and prepared ahead of time;
- Integration of environmental requirements into all areas of mine planning, particularly incorporating progressive rehabilitation;
- Progressive review and refinement of site Environmental Management Plans;
- Collaborations across site functions to improve GIS (Geographical Information System) and other electronic information systems, including increased drone monitoring capabilities;
- Wet season preparedness and establishment of erosion controls.

PROGRESSIVE REHABILITATION

The Bauxite Hills Mine built upon its initial rehabilitation works from 2019 drawing on their mining experience to streamline the combined mining and rehabilitation processes. All available mining pits from the previous 2-years of operations were backfilled and topsoiled.

Where practicable, backfilling and topsoiling occur as close as possible to the mining areas. This reduces double handling of topsoil and over burden plus immediate replacement of topsoil allows live seed store to be maintained. In 2020, this resulted in significant natural seed germination occurring before any rehabilitation works were done. In 2020 Metro achieved its commitment to seed and fertilize 100 hectares of available land which represents 40% of all mine pit disturbance at the Bauxite Hills Mine. Native tree seeds used for rehabilitation were obtained from the Cape York region and sourced by a number of parties, namely, the local Indigenous communities working under Metro's Seed Collection Program, the Bauxite Hills on-site environmental team and third party contract seed collectors. Application of seed and fertilizer was undertaken by a local contractor from the Native Title holder; the Ankamuthi people.

KAOLIN MINE REHABILITATION

Rehabilitation of the old kaolin mine pits, inherited by Metro with the mining leases, was due to start in 2020. This was unable to occur due to the COVID-19 travel restrictions that prevented the rehabilitation contractor travelling to site. Metro sought and was given approval from the Department of Environment and Science to defer the proposed rehabilitation work. Further discussions will be undertaken with the regulator to determine when and how this work will recommence.

8.2 WASTE

Metro Mining's Bauxite Hills Mine has developed a Waste Management Plan (WMP) that incorporates the "Waste Management Hierarchy" and "Cleaner Production Concepts". Through the WMP the mine is looking to move away from landfill disposal practices and move further toward waste reduction, reuse, recycling and recovery opportunities. Employees, contractors and suppliers are required to comply to Metro's WMP.

Each waste stream is segregated on-site and managed in compliance with appropriate regulations as follows:

- Recyclables and bulk materials are disposed through registered recycling facilities.
- Regulated and hazardous wastes are removed from site and treated at a licensed government approved facility and tracked for safe disposal.
- Camp putrescible waste is managed with a small composting unit that provides compost for the camp gardens.

2020 Achievements:

- Removal of all regulated waste from inherited Kaolin wet plant;
- Identified of local recycling facility with capacity to recycle all of Bauxite Hills Mines' tyres.

2021 initiatives include:

- Construction of large-scale composting facility to decrease amount of waste leaving site for treatment and also provide a soil conditioner and enhancer for mining rehabilitation. (2020 construction delayed due to COVID-19 restrictions).
- Large scale clean-up of inherited waste from the old Kaolin mine pits.
- Ongoing training of the workforce to improve waste management practices.

There is no landfill in use at the Bauxite Hills Mine with all waste either re-used on-site or shipped off-site for recycling or disposal by certified waste management operators. Additionally, as beneficiation of bauxite does not occur there is no waste material produced and no tailings dams required.

Recycled Waste from Bauxite Hills Mine

Aluminium cans on-site:	0.22 Tonnes
Scrap Metal & Batteries:	40 Tonnes
Liquid Waste:	56 Tonnes
Cardboard:	8.15 Tonnes

8.3 WATER

Metro has developed a range of management plans to protect the high ecological value of the surface water

and groundwater systems around the Bauxite Hills Mine. The management plans are focused on the monitoring and management of these water systems to mitigate any negative impact.

Mine water management plans include:

- Water Management Plan
- Groundwater Monitoring Program
- Integrated Marine Monitoring Plan
- Marine Management Plan
- Receiving Environment Monitoring Plan
- Erosion and Sediment Control Management Plan

Together these plans ensure groundwaters, surface waters, mine water releases, stormwater and dust suppression activities are undertaken in compliance with all relevant water licensing and industry regulators.

Water requirements during operations is approximately 1 ML/d. The majority of this is raw water, used for dust suppression from mining and haulage activities, and is supplied from the inherited kaolin mine water storages.

Groundwater is only extracted for potable water supply used at the camp and port area. With no mineral processing or contamination of pit waters, the only mine wastewater produced is effluent from the sewage treatment plant, the vehicle wash-down facility, and runoff water from disturbed areas.

In 2020 Metro

- Installed additional water tanks to optimise utilisation of the water supply for dust suppression.
- Installed additional sewage effluent storage capacity to ensure wet season compliance.
- Upgraded the road crossing on Namaleta Creek to maintain rates of natural water flow.

	Kilolitres
2020 Total volume of water used at the Bauxite Hills Mine	209,959
Total Vol groundwater:	17,177
▪ Groundwater Vol supplied to port:	5,074
▪ Groundwater Vol supplied to camp:	12,103
Total Vol surface water:	192,782



Saltwater crocodile at Skardon River.

8.4 BIODIVERSITY

Maintaining the biodiversity of the ecosystems in which we operate is an underlying pillar of Metro Mining's environmental strategy.

Bauxite Hills Mine is focused on maintaining all existing ecosystems and the variety of species that inhabit them.

Bauxite mining only occurs on the higher plateaus and away from the low-lying wetland and swamp areas identified as having more diverse ecological value.

The predominant ecosystem impacted by mining operations is the Darwin Stringybark (*Eucalyptus tetradonta*) woodland. The Cape York region has over 525,000 ha of Darwin Stringybark woodland, of which the Bauxite Hills Mine has potential to impact less than 1%. The mine's potential to impact the biodiversity of the region is therefore inherently low.

BIODIVERSITY PROGRAMS INCLUDE:

- Mine planning ensures vegetation clearing is minimised, significant buffers are maintained around all waterways & wetlands and flora & fauna corridors are incorporated wherever possible;
- Flora and fauna spotter-catchers undertake surveys prior to clearing to identify any potential areas of higher biodiversity value and are present during

all clearing activities to capture and relocate any species during the clearing process;

- Progressive rehabilitation focuses on developing post-mining ecosystems that have similar ecological values to pre-mining conditions;
- Any potential risk to our biodiversity values is further reduced by the implementation of Environmental Management Plans (EMPs) that include both management and monitoring programs. A case-study of the Land Use Management Plan (LUMP) in relation to feral pig control is provided below.

COMMONWEALTH OFFSETS

The Bauxite Hills Mine Commonwealth Approvals include the requirement for an environmental offset program. In 2019 the Department of Agriculture, Water and the Environment (DAWE) approved the Offset Strategy which was due to start in 2020. Metro had finalised a Research Agreement with the WA University to begin implementation of the Strategy however COVID-19 travel restrictions prevented Cape York community consultation from occurring. As work was unable to begin Metro sought and was given an extension to the start of the Offsets Strategy.

Metro's environmental offset requirement is currently under review by DAWE following new information supplied by Metro.

Infestations of weeds and feral animals are two major threatening processes identified at State and Commonwealth level that can adversely impact biodiversity.

In the Cape York region, feral pigs are a specific threat to the native ecosystems and, as with the majority of Cape York land managers, the Bauxite Hills Mine has recorded high numbers of feral pigs. Feral pigs cause significant damage along waterways, killing riverine vegetation and contaminating local waterways with sediment and their own wastes. They are also a major threat for a number of endangered sea turtles that nest along nearby beaches as, if not controlled, feral pigs eat large numbers of sea turtle eggs.

The Bauxite Hills Mine Land Use Management Plan (LUMP) has identified the feral pig risk and the appropriate management procedures to manage this threat.

Under the LUMP, feral pig control programs are undertaken in consultation with the Indigenous landowners and the Indigenous Land & Sea Rangers. Due to the large area and limited access feral pig control usually involves culling by licenced operators in helicopters. These controls are a necessary part of maintaining the native biodiversity of both flora and fauna in the Cape York region.



Herd of feral pigs at the Bauxite Hills Mine.



Transshipping bauxite ore along Skardon River.

8.5 COMPLIANCE

Bauxite Hills Mine is a single mine that operates under two separate mining approvals which means two State and two Commonwealth approvals are in place. In 2020, Metro self-reported a number of minor water quality triggers with the two State Environmental Authorities (EA) and undertook two EA amendments for:

- Finalisation of groundwater quality triggers;
- Deferment of inherited kaolin mine rehabilitation commitments.

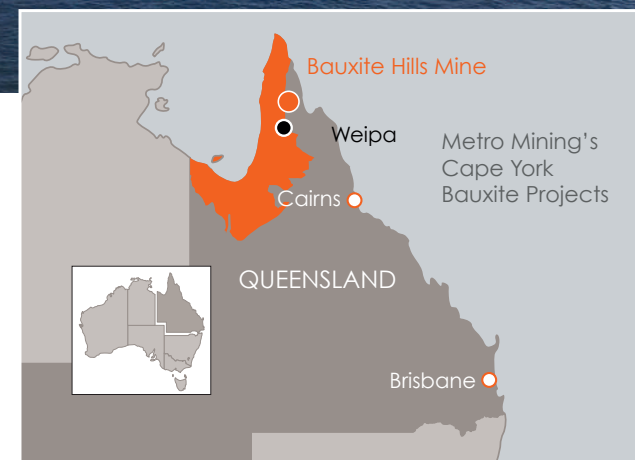
In relation to the groundwater quality triggers, during the year a number of non-compliances occurred. An independent Investigation identified no environmental harm and recommended that further EA amendments be undertaken in 2021 to set appropriate limits.

The Department of Environment and Science (DES) issued one warning notice of non-compliance relating to Metro's Integrated Marine Monitoring Program. No environmental harm was identified and Metro has instigated the appropriate monitoring procedures to prevent any future occurrence. DES deemed no regulatory action was required. Annual compliance reports are completed for each of the Commonwealth approvals and are displayed on the Metro Mining website. No significant noncompliances have been identified and DAWE confirm that, based on reports provided, Metro is operating in compliance with our licences.

8.6 CLIMATE CHANGE

The Bauxite Hills Mine is situated on western Cape York on the Skardon River with bauxite ore being transhipped directly to ocean-going vessels anchored at sea. In this location, climate change presents some clear and present risks in relation to increased extreme weather events and rising sea levels. Metro has recognized the economic risks associated with the increasingly stringent regulatory regime and associated changes to operations that may be required to meet greenhouse emissions reduction targets.

Bauxite Hills Mine has no access to grid electricity supply with all on-site power being provided by diesel-driven generators. Diesel is the only fuel supply for equipment and machinery used on site and the vast majority of the mine's greenhouse emissions relate to diesel use.



Optimising our diesel usage, or replacing diesel with non or lower emitting power sources, will be a major focus for any future greenhouse emission reduction targets.

Metro is currently not required to report to the National Greenhouse Energy Reporting Scheme (NGERs) as we fall below the emission trigger limits and therefore no emission reduction target is required. Metro is committed to improving the efficiency of the mine's operations which will assist in the reduction of greenhouse emissions.

In the 2019 Sustainability Report, Metro identified a number of activities to better quantify greenhouse emissions and develop an action plan for emission reductions scheduled to begin in 2020. As COVID-19 began to impact international markets, Metro's 6.0M WMT planned production increase was effected. Works related to the production increase were put on hold and subsequently plans for recalculating greenhouse emissions were delayed.



Maintaining solar panels for Skardon River tidal gauge.



9. SOCIAL

Metro Mining believes a fundamental requirement of successful business is supporting the communities in which we operate and that a properly managed mining operation will bring significant benefits to the associated local and regional communities.

Metro aims for honest and open communication in all activities and respects the culture, customs, interests, needs and rights of the Traditional Owners, Indigenous people and communities in which we operate. We strive to build long term and mutually beneficial relationships based on these ideals.

Metro communicates with stakeholders via many platforms including:

- Formal Meetings
- Community events & meetings
- Sponsorships
- Corporate publications
- Newsletters
- Social media
- ASX Releases
- Media Releases

9.1 EMPLOYEES

Metro Mining considers their people to be their greatest strength. Working relationships are encouraged and based on mutual trust & respect. Metro strives to provide a healthy workplace that encourages a life/work balance incorporating work, family and social commitments whilst achieving the company's business goals.

9.1.1 EMPLOYEE ENGAGEMENT

Due to the potentially harmful impacts that the COVID-19 pandemic could have had on our workforce it became imperative for additional employee engagement to occur across our workforce. The mental health and wellbeing of our employees was also an important issue that needed to be taken into account. Particular consideration was given to all our fly-in/fly-out workers as Government imposed travel restrictions, combined with the mandatory 14-day isolation period, severely impacted a large percentage of our employees. In addition there was the

further complication that a number of our employees lived in the protected biosecurity area. Employees living in this area were given the option of relocating to Cairns or being temporarily stood-down with their jobs held open for them.

The majority of employees from this area chose to remain in community with family during this time and communication was maintained by Metro's Community Liaison Officers who also remained in community. All employees received our COVID-19 Newsletters (refer COVID-19 Newsletter Case study) and additional Policies & Procedures were established, implemented and communicated on-site and off-site (Refer COVID-19 Response).

9.1.2 DIVERSITY

Metro Mining advocates an inclusive culture and employs a diverse workforce with a wide range of backgrounds, values, skills and experience.

Metro values diversity and supports all employees equally, regardless of gender, age, language, ethnicity, cultural background, sexual orientation, religious belief and family responsibilities. Diversity also refers to other ways in which people are different such as educational level, life experience, work experience, socio-economic background, personality and marital status.

Metro recognises the intrinsic importance of diversity in building operational strength and the future growth that comes from incorporating a wide variety of capabilities, ideas and insights in decision making, problem solving and policy development.

All employees are selected for positions on merit and provided equitable access to employment and professional development.

In 2020 a series of "Women in Mining" Workshops had been planned however due to COVID-19 travel restrictions Metro's CLO's were only able to hold 2 workshops. These workshops were targeted toward Indigenous women and held in Bamaga and Hopevale.

Metro recognizes all individuals are unique and encourages behaviours of fairness, equity and respect for all and it is the policy of the Metro Mining Board to increase diversity.

9.1.2 TRAINING

Metro Mining encourages all employees to develop their careers and provides regular training to all personnel to enable them to undertake their work safely and efficiently. Employees can also apply for a "Metro Career Development Grant" should they wish to undergo additional training in their field.

Metro conducts monthly employment reviews to ensure the workplace continues to be fulfilling and develops a culture that promotes individual accountability and rewards initiative.

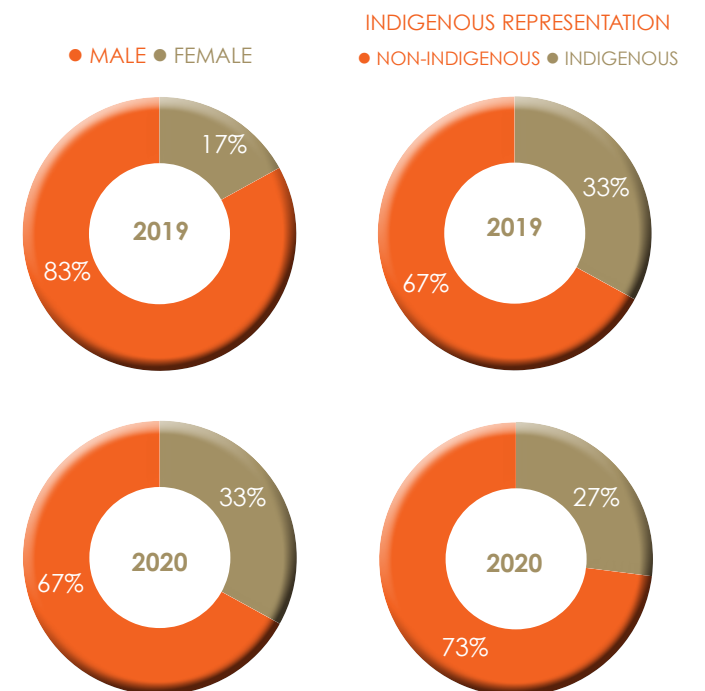
The promotion of cultural awareness among Metro's employees and contract partners is a priority. In 2020 Cultural Awareness training was delivered by Ankamuthi presenters to all Directors and head-office employees. All on-site personnel and contract partners also undertook Cultural Awareness training prior to commencing work on-site.

At Metro's Bauxite Hills Mine a range of Traineeships are offered to eligible applicants. In 2020 there were 5 Trainees working toward achieving a Certificate III; which typically takes between 1-3 years to complete. Trainees that were course complete in 2020 were a Laboratory Technician and an Environment Technician. In addition to these Traineeships a range of Leadership Training Programs were also facilitated on-site at the Bauxite Hills Mine (Supervisor 1, Supervisor 2, Supervisor 3).

In 2021 Bauxite Hills Mine are planning to offer 5 Traineeships (2 Environment Technicians, 2 diesel fitters and camp Administrator).

DIVERSITY

COMPANY GENDER REPRESENTATION



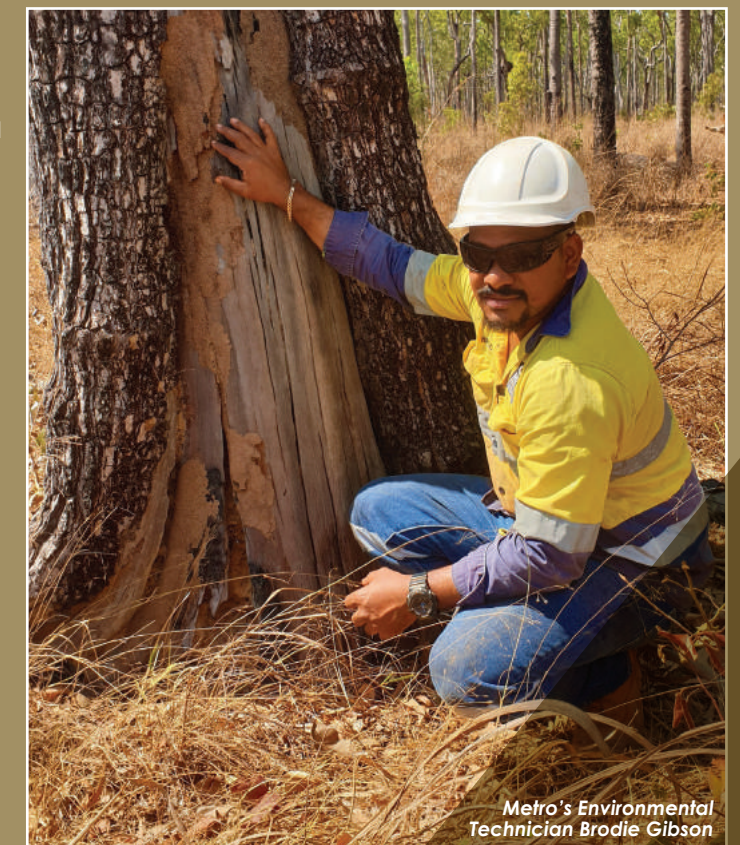
9.1.4 TRAINING

CASE STUDY | BRODIE GIBSON

Brodie started his journey with Metro at Bauxite Hills Mine as an Ankamuthi Environment Technician trainee in August 2019. With hard work, determination and a good work ethic Brodie successfully completed his Certificate III training in 18-months and received his Certificate III in Conservation & Land Management in November 2020.

The Certificate III course is conducted both on-site by RTO tutors (Registered Training Organisations) and there is also a large revision and preparation component to be completed at home.

Brodie is now an Environment Technician at the Bauxite Hills Mine and Metro remains committed to training and promoting from within their workforce. Environment Superintendent Sven Sewell said "Brodie can be rightly proud of his achievement. His passion for his chosen field combined with his work commitment and dedication to his studies has resulted in him carving out a future for himself in the environmental arena. I am extremely pleased and proud of Brodie and hope he remains at the Bauxite Hills Mine for some time as he has become an integral and well regarded member of our Environmental team".



Metro's Environmental Technician Brodie Gibson

9.2 STAKEHOLDER ENGAGEMENT

Metro Mining's stakeholders include local and Indigenous communities, Regional and Aboriginal Councils, State and Commonwealth Departments, the Port Authority, environmental groups, contractors, suppliers and transport companies.

Throughout 2020, and despite the unexpectedly challenging conditions presented by COVID-19, Metro continued to engage with all our stakeholders. With limited opportunities available for face-to-face meetings, stakeholder communications were maintained electronically through emails and phone calls with virtual meetings taking a larger role in maintaining our relationships.

Throughout the COVID-19 pandemic the Bauxite Hills Mine produced a fortnightly COVID-19 Newsletter which was widely distributed via email and on Metro's website. (Refer Case Study on right)

Regular communication is also maintained with our shareholders, the mining community and the ASX. Metro places all notices of shareholder meetings and related explanatory material on its website.

Metro encourages shareholder participation at its AGM which provides a forum for shareholders to participate as well as submit questions prior to the meeting. Metro's external auditor, Ernst & Young Australia (EY), attends the AGM and are available to answer shareholder questions regarding the audit and the preparation and content of the Auditor's Report. Shareholders also have the opportunity to submit written questions to EY as permitted under the Corporations Act 2001 (Cth).

Metro also meets all standard corporate reporting requirements including Annual Report, Quarterly Reports, Sustainability Report and ASX releases all of which are available on Metro's website.

9.2.1 STAKEHOLDER ENGAGEMENT

CASE STUDY | COVID-19 COMMUNITY UPDATES

In Queensland, COVID-19 restrictions began in March 2020 and the Bauxite Hills Mine was forced to cease their fly-in/fly-out operation into the biosecurity area of the Northern Peninsula Area (NPA).

Any employee living in this area, was given the option to relocate to Cairns and receive a living-away-from-home allowance however for employees with family commitments moving to Cairns was simply not viable. Metro also gave employees the option to be temporarily stood-down, allowing eligibility to COVID-19 Government subsidies, while Metro held open their job until travel restrictions lifted. A total of 15 Metro employees were stood-down. During this time Metro recognised the importance of keeping stood-down employees and affected communities informed about the rapidly changing COVID-19 situation, the impacts on them and mine site operations.

In March, Metro produced a number of COVID-19 Updates and when the severity of the situation became apparent communications were made fortnightly via Metro's "COVID-19 Community Updates" and were distributed to employees in affected communities, stakeholder groups and accessible on Metro's website. Positive feedback was received from employees and local communities regarding the regular communications and connection to the Bauxite Hills Mine.



Metro Enviro & Community Manager talking with Hope Vale residents.



Northern Peninsula Area community members.

9.3 TRADITIONAL OWNER ENGAGEMENT

Traditional Owner engagement is an important element of Metro's overall Stakeholder Engagement Plan and focuses on the Native Title holders of the land, the Ankamuthi people represented by the Seven Rivers Aboriginal Corporation (SRAC), and the Aboriginal land owners, represented by the Old Mapoon Aboriginal Corporation (OMAC). Metro has a signed Ancillary Agreement (AA) with SRAC and OMAC that establishes the level of communications and involvement between all parties. The AA stipulates a range of commitments, including employment & training opportunities, cultural obligations and the establishment of a Liaison Committee.

The Liaison Committee provides a forum for all parties to meet and discuss Traditional Owner opportunities and ways to optimise communications. During 2020 the Liaison Committee met three times. The first meeting was held in March, prior to COVID-19 restrictions, the second meeting was delayed until September and the third meeting was held in December. All meetings were well attended and followed COVID-19 social distancing regulations. Progress was made in a number of areas, although due to travel restrictions some activities had to be delayed. The most significant delay was the review of the AA and the Cultural Heritage Management Agreement (CHMA), scheduled to be undertaken in May 2020, however travel restrictions and attainability of acceptable facilitators prevented reviews from occurring. These reviews are now planned for the first half of 2021.

Whilst Metro's on-site cultural heritage management meets the agreed CHMA requirements, COVID-19 travel restrictions caused complications as trained Cultural Heritage Monitors from the NPA were not allowed to travel to the mine site. To resolve the situation Metro collaborated with SRAC and found Ankamuthi Cultural Heritage Monitors in Cairns, acceptable to SRAC, to come to site to undertake Cultural Heritage works prior to mining.

Prior to COVID-19 travel restrictions, Metro's Community Liaison Officers (CLOs) conducted 'Women's Workshops' in communities. The workshops were designed to inform local indigenous women about available positions at the mine and allay any concerns about leaving community and working on site. The first workshop held in Bamaga and the second workshop held in Hope Vale were well attended by local Indigenous women. Metro aims to increase the amount of women in their workforce through open communications and advocating equal opportunities.

COVID-19 travel restrictions and the early wet season shutdown meant Metro's two Ankamuthi CLO's worked entirely in their communities maintaining relations and imparting information to Metro employees. Katherine Steffensen works with the Hope Vale and Mapoon communities and Rebecca Williams works in the NPA Region and Cairns.



Women in Mining workshop at Bamaga, presented by Metro's CLO, Rebecca Williams.



9.4.1 SPONSORSHIP

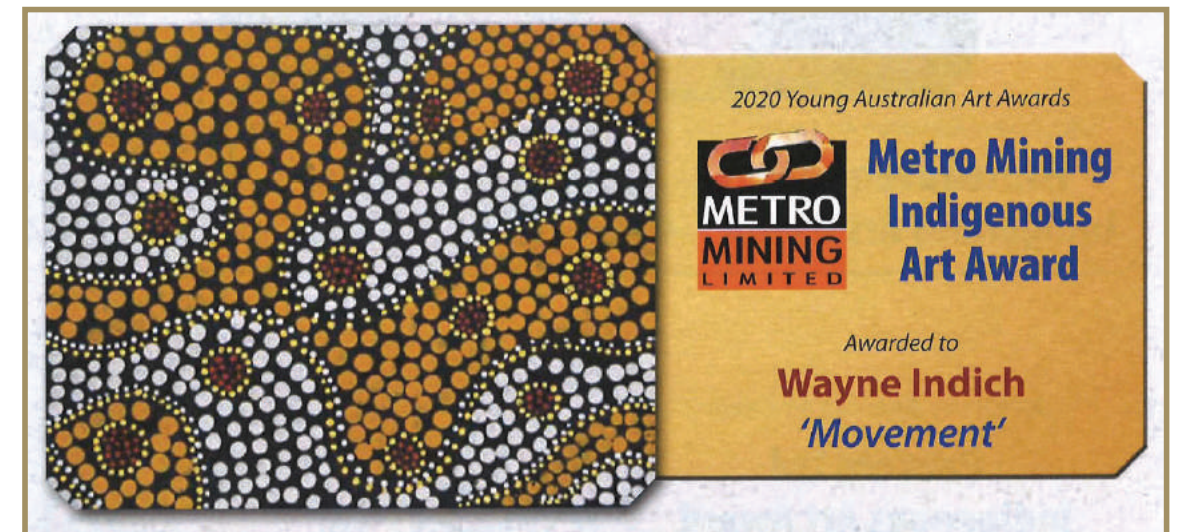
Metro Mining encourage sponsorship requests from local community groups and organisations that deliver benefits and good outcomes for the broader community.

As a result of COVID-19 Metro's ability to sponsor community events was restricted by the cancellation of a number of major events including the NPA Cultural Festival and Mapoon's Paanja Festival.

Given the reduced sponsorship opportunities available, Metro chose to continue its community support by

sponsoring a virtual art and writing mentoring platform, called the "Young Indigenous Art & Literacy Program". The art and writing workshops were specifically designed to assist Indigenous children to make connection to their oral history through writing and art.

Primary Schools in Mapoon, Hope Vale, Injinoo and Bamaga all participated in the weekly virtual workshops. The culmination of the program was the "2020 Young Australian Art Awards" and the inaugural "Metro Mining Indigenous Art Award" which was won by Wayne Indich for his artwork titled "Movement".



9.4 COMMUNITY INVESTMENT

Metro Mining is committed to growing stronger economies and social wellbeing in partnership with local communities.

A key of Metro's approach to sustainability is for local communities to benefit from the partnerships that have developed resultant to mining operations.

Benefits can include employment, increasing existing business viability, creating new business opportunities, supporting community initiatives and general economic wellbeing within the community.

In 2020 Metro continued their Community Seed Collection Program to facilitate rehabilitation at the Bauxite Hills Mine. The program focuses on native seed collection by the local Indigenous communities, who form part of Metro's Bauxite Hills Mine AA. Seed collections were held monthly, with a brief disruption due to COVID-19 travel restrictions, and were facilitated by Botanist Dr James Hill in the communities of Mapoon and Injinoo.

Local communities are familiar with native plants in their area and where to locate them enabling them to use their knowledge to collect native seeds from the Cape York region. A field-based Seed Collection Workshop was also held in 2020 to encourage those interested in the processes about how to collect, clean and store seed. The field day was well attended by community members of all ages.

Metro's Community Seed Collection Program aims to provide an opportunity for Indigenous people to earn an income and actively contribute to the environmental sustainability of their traditional land. It also assists in supporting local economic growth. Over \$21,000 was paid directly to community members in 2020 providing opportunities for local Indigenous people and giving families the ability to work together on-country.



9.3.1 INDIGENOUS COMMUNITY ENGAGEMENT

CASE STUDY | METRO'S COMMUNITY LIAISON OFFICERS

Metro Mining employs two Community Liaison Officers from the Ankamuthi People, the Native Title holders of the Bauxite Hills Mine land. Rebecca Williams is the CLO for the Northern Peninsula Area (focused on Injinoo) and Cairns. Katherine Steffensen is the CLO for Mapoon and Hope Vale. The CLO's spend half their time in their respective communities, and half at the Bauxite Hills Mine.

When in community, their role is to be the face and contact point for Metro assisting with any queries or concerns relating to the mine operations and proactively disseminating information. They are also tasked with identifying potential positive sponsorship opportunities and communicating any job vacancies at the mine and helping local Traditional Owners apply for these positions.

When Kathi and Rebecca are at the Bauxite Hills Mine site they are the main the point of contact for Traditional Owners. For many Traditional Owners, working on a mine site is a new experience and Kathy and Rebecca provide a familiar face to talk to about any issues related to working and living at the mine and away from their family and community.

Kathi and Rebecca also assist and support Traditional Owners through any disputes or work related incidents to ensure they understand Metro's processes and procedures.



During the COVID-19 travel restrictions and the early wet-season shutdown Kathy and Rebecca were not able to work on the mine site and therefore focused their time entirely in their local communities.

During their extended time in community Kathy and Rebecca promoted Metro's monthly Seed Collection Program facilitated by Botanist Dr James Hill.

9.5 REGIONAL ECONOMIC DEVELOPMENT

Metro Mining encourages and supports regional economic development by providing opportunities for employment, business development, education and training.

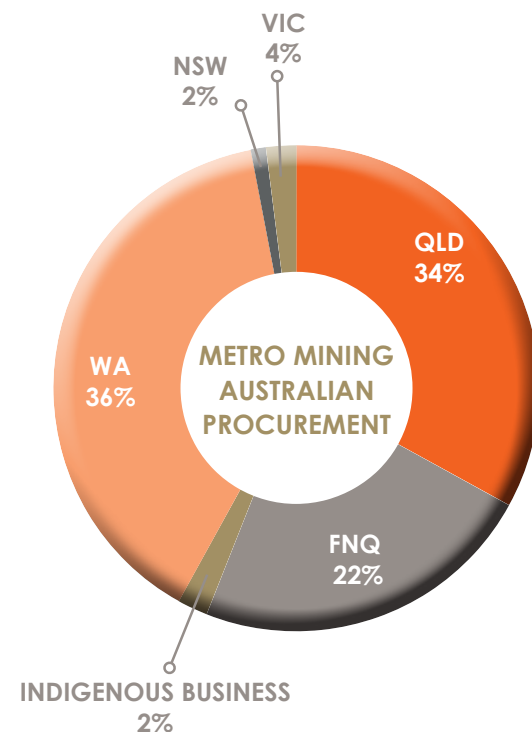
9.5.1 LOCAL PROCUREMENT

Metro Mining seeks to support the communities in which we operate using local and regional suppliers wherever possible and practical.

Metro aims to prioritise local procurement, employment and training particularly from local communities and to foster mutually beneficial relationships with long term economic benefits.

Due to the remoteness of Bauxite Hills Mine, and associated cost of transporting goods, preference is given to local suppliers when possible. The mine is dedicated to engaging with local communities to encourage economic growth in the Cape York region. Bauxite Hills Mine endeavours to employ and buy locally to create benefits that flow through to local communities and the State of Queensland.

In 2021 the focus is to increase the benefits over time, regularly review the procurement spend and develop a list of preferred FNQ and Indigenous suppliers.



9.5.2 TRADITIONAL OWNER BUSINESS

Metro is committed to working with our Traditional Owners, the Ankamuthi people, to identify potential business opportunities at the mine site, or for supply to the mine site, that could be developed into viable businesses.

Metro currently utilises Ankamuthi businesses for:

- Cultural Awareness Training;
- Contracting works at the mine site, including roadside slashing and road maintenance and;
- Seeding for rehabilitation works.

At the start of 2020, Metro was working closely with an Ankamuthi business to develop the planned Indigenous Pre-Employment Training program however the program was put on hold when COVID-19 restrictions commenced.

Additional potential business opportunities include:

- Commercial tree felling within the planned mining area;
- Camp Management
 - Catering
 - Cleaning
 - Laundry
- Tree seed and nursery supply business.

The process of working cooperatively and collaboratively with Traditional Owners to develop potential business opportunities helps establish strong relationships and procedures that maximise business openings as they arise.



Cairns based, Bauxite Hills Mine charter flight operator East Air.





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