

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## ABOUT THIS REPORT

The Directors are pleased to present the Environmental, Social and Governance Report ("Report" "ESG") for the year ended 30 June 2023, in compliance with applicable code provision of the Environmental, Social and Governance Reporting Guide as set out in Appendix 27 of the Rules Governing the Listing of Securities on the SEHK.

The Company has a robust and comprehensive system of governance that is essential to the ongoing sound operation of the Company, and balancing the interests of the Company's shareholders, suppliers, governments, and the various communities (collectively the "stakeholders") in which the Group operates.

## SCOPE AND PERFORMANCE

With the delay in development of the Marillana Project and no mining activities undertaken during the year, the scope of the report covers all operations of the Group, mainly the head office in Hong Kong and its subsidiaries in Western Australia. The report presents information relevant to the ESG management approach for the financial year from 1 July 2022 to 30 June 2023 (the "Reporting Period").

This Report has been prepared in accordance with the principles of materiality, quantitative approach, balance and consistency, and complies with the mandatory disclosures requirement and the "comply or explain" provisions. The Group's performance is reviewed annually and reviewed by the Board and Risk Management Committee, details of which are outlined in our "Risk Management and Internal Control" section in the Corporate Governance Statement of the Company's published 2023 Annual Report. This Report can be accessed from the Sustainability section of the Company's website [www.brockmanmining.com](http://www.brockmanmining.com).

### Statement of the Board of Directors

The Board retains the overall responsibility for the Group's ESG management and is committed to operating in a manner that contributes to the sustainable development of mineral resources through efficient, balanced, and long-term management while demonstrating consideration for the wellbeing of our people; and protection of the environment.

The Group recognises its responsibility for minimising the impact of its activities on, and protecting the environment. The Group is committed to developing and implementing practices in environmental design and management and actively operates to:

- Work within the legal permitting framework and operates in accordance with our environmental management systems,
- Identify, monitor, measure, evaluate and minimise our impact on the surrounding environment,
- Give environmental aspects due consideration in all phases of the Group's projects, from exploration to development, operation, and final closure, and
- Act systematically to improve the planning, execution and monitoring of its environmental performance.

Looking forward to the future, the Board will also perform timely review of the Group's strategic planning and performance. The Board also sets out ESG goals and targets based on relevant KPIs and reviews the results on a yearly basis. We strive to provide a supportive environment and incorporate ESG initiatives into our strategy to reduce the Group's carbon footprint.



The compilation of the report follows the principles as suggested by the ESG reporting guidelines:

Materiality	Opinions of stakeholders were gathered from internal and external stakeholders engagement and we have reviewed and determined the material ESG aspects to the Group.
Balance	To provide an unbiased assessment of the Group and report not only the progress of sustainability development, but also the future plans.
Quantitative	Quantitative key performance indicators are used to monitor the sustainability progress and results of target implementation.
Consistency	Unless otherwise stated, the ESG report adopted consistent methodology from time to time.

## MATERIALITY ASSESSMENT

The Group defines material stakeholder groups as these who have frequent connections, significant financial and operational influence and form a long term and strategic relationship with the Group.

### Stakeholder Engagement

Stakeholder and shareholder opinions are crucial for the continuous improvement of the Group's ESG performance, and the Board recognises the importance of good communication with stakeholders. Information in relation to the Group is disseminated to shareholders in a timely manner through a number of formal channels, which include interim and annual reports, announcements, and circulars. Such published documents together with updated corporate information and news are made available on the Company's website under the sections Investors and Announcements respectively.

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Aspects and KPIs relevant to this report's disclosure are set out as follows:

Stakeholders	Material issues	KPI	Engagement channels
Investors and shareholders	Business operations	General disclosure	Financial reports and announcements
Regulators	Compliance with laws and regulations	General disclosure on aspects A1, B1, B2, B4, B6, B7	On-going compliance review
	Disclosure		Shareholder meetings
	Environmental	Aspects A1-A4 and relevant KPIs	On-going communications
	Anti-corruption	KPI B7.1-3	Training for directors and management
	Labour standards	KPI B4, 1-2	Yearly review and monitoring of latest regulatory updates
	Product Responsibility	General disclosure	Framework of product quality assurance will be developed prior to the delivery of first ore
Suppliers	Supply chain management	KPI B5.1-4	Review of suppliers and procurement procedures
Employees	Remuneration and labour standards	KPI B1.1-2	Yearly review
	Training and development	KPI B3.1-2	Training for directors and management
	Occupational health & safety	KPI B2.1-3	
Community	Charity work	KPI B8.1-2	Support charity organisations



## A. ENVIRONMENTAL

### A.1 EMISSIONS

During the year, the Group was at minimal spend and retained office space to continue the advancement of the joint operation with MinRes. Mining development is yet to commence and management considers that the emissions and waste generated by any exploration activity would have an insignificant impact on the environment due to the minimal activities undertaken. Hence, there are no relevant laws and regulations applicable to these activities.

	Target of net decrease	2023	2022
i) Purchased electricity consumption	Target not fully realised	<b>19,522 kWh</b>	18,770 kWh
ii) Scope 1 GHG Emissions	Not applicable	<b>Not applicable</b>	Not applicable
iii) Scope 2 GHG Emissions	Met	<b>8,685.58 kg CO<sub>2</sub></b>	11,049.84 kg CO <sub>2</sub>
iv) Scope 3 GHG Emissions	Not applicable	<b>Not applicable</b>	Not applicable

Note:

Scope 1 emissions come from direct GHG emissions from combustion of fuels in stationary or mobile sources (excluding electrical equipment) to generate electricity, which is not applicable in our case as our development and production activities have yet to commence.

Scope 2 emissions come from indirect GHG emissions from the generation of purchased electricity.

Scope 3 emissions include other indirect GHG emissions that occur outside the Company such as emissions from business travel of employees and paper waste disposed of at landfill, upstream and downstream emissions from the supply chain etc., which is not significant to the Group as our development and production activities have not commenced.

\* Emissions for Nitrogen Oxides (NO<sub>x</sub>), Sulphur Oxides (SO<sub>x</sub>) and Respirable suspended particulates (RSP) are not disclosed as the amount is insignificant.

Greenhouse Gas emissions (GHG Emissions) for the reporting period are mainly generated from general direct electricity consumption from office use.

Relevant KPIs are as shown below:

The scope during the reporting period covered a gross floor area of 249.10 m<sup>2</sup>.

GHG intensity by floor area amounts to 34.87 kg CO<sub>2</sub>-e/m<sup>2</sup> (2022: 44.36 kg CO<sub>2</sub>-e/m<sup>2</sup>).

The Group continues to operate at minimal spend and targets a net decrease in emissions prior to the commencement of any future developmental activities. Due to the very low emissions of the Group based on current activities, actual emissions are not currently measured or quantified. Emissions will be measured once development activities have commenced.

The Company has practically achieved its emission target for the year, and has implemented the following continued measures to reduce our emissions in relation to office activities:

- Reduction of unnecessary business trips and board meetings organised via electronic communications.
- Encouraged employees to switch off lights and air conditioning.
- Procure only electrical appliances with "Grade1" or equivalent energy labels if needed to increase energy efficiency.

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During the reporting period, the Company incurred no unnecessary business trips (domestic and overseas) and all board meetings were conducted via electronic communications.

During the reporting period, no material hazardous or non-hazardous waste was generated as our operations are office based in nature. Waste generated comprises printer toner cartridges, batteries and obsolete computer and printing equipment. These were properly disposed of and recycled. Non-hazardous waste such as general domestic refuse and printing paper from office operations were considered minimal. A further detailed reporting on mine waste will be available when mine and process development activities have commenced.

## A.2 USE OF RESOURCES

The Group is committed to promoting an environmentally conscious work environment and has focused on measures to minimise waste and electricity consumption, initiate paper and cartridge recycling and promote electronic communications and storage. We promote recycling of office equipment and reduce domestic waste as much as possible.

To reduce consumption of paper, the Group prefers using electronic means to disseminate information via electronic devices and electronic communication systems. During the year, the Company have implemented savings in printing and mailing costs by recommending to Shareholders the election of electronic means of receiving corporate communications.

We encourage our office employees to switch off idle lights, air conditioners and other office equipment, and we remind our employees to print and photocopy on both sides of paper if printing is unavoidable. We also encourage our employees to bring their own lunch and reduce purchase of takeaway and beverages and hence reduce the use of plastic disposable utensils. The Group encourages its employees to choose public transportation and carpool to reduce car driving and thus the impact on the environment and transportation. The Group does not own any vehicles and we therefore do not directly produce any greenhouse and hazardous gases from cars used.

Our offices are required to maintain in-door temperature at 24 degree Celsius to ensure efficient use of air conditioning.

As stated above, the Group endeavours to target a net decrease in emissions for the upcoming year. Purchased electricity contributes to the majority of our emissions; hence a target of net decrease in yearly energy consumption is set.

The Group promotes initiatives to mitigate environmental impacts by choosing energy-efficient products by comparing Energy Labels issued by the Electrical and Mechanical Services Department (EMSD)/ Energy Rating Labels issued by the Australian Federal Government. As waste electrical and electronic equipment (WEEE) poses severe harm to the environment, the Group encourages all employees to use the WEEE donation or recycling programs. All employees are responsible and accountable for operating in an environmentally responsible manner.

The total purchased electricity for the year ended to 19,522 kWh and the electricity usage intensity by floor area amounted to approximately 78.37 kWh/m<sup>2</sup>.

The Group's existing business operation does not require any significant water consumption, water usage and any consumption relates to drinking water (including bottled water).



There is no applicable data of water consumption because it is not feasible to obtain water withdrawal and discharge data as commercial office leases in Hong Kong and Australia are not billed separately by the building management for the water supply and discharge. Although data on water usage was not quantifiable, the Group maintains best endeavours to conserve the environment by requiring our employees to report immediately damage to any water facilities and prompt water awareness.

There is no issue in sourcing water that is fit for purpose whereas the Group considers its water consumption level is reasonable at the current operational level. The Group targets to have a net decrease in water and electricity consumption next year by implementing the measures as discussed above.

Due to the nature of the business, there is no applicable data of packaging material as our operation does not involve the use of any packaging material.

### A.3 THE ENVIRONMENT AND NATURAL RESOURCES

The Company is committed to the principles of being a good corporate and environmental citizen, and takes careful consideration of environmental, social responsibility and sustainability issues when choosing its vendors. The Group aims to minimise its environmental footprint and its disturbance to natural resources. We anticipate that fines residue storage and waste rock management, water use and discharge, and land management and rehabilitation would be the most important areas of concern once in production and the Group shall closely monitor these aspects, in compliance with its regulatory approvals obtained with key State and Commonwealth Governments that have been received for the Marillana project. Each year, the Company undertakes an annual compliance review and provides a report to the Office of Environmental Protection Authority to declare its compliance status as required.

Brockman is proposing to clear up to 3,785 ha of vegetation to mine and transport ore to Port Hedland by a land infrastructure solution. After rehabilitation, the long-term cleared footprint will be around 60 ha which represents the final open pit void. All other disturbances will be rehabilitated to the satisfaction of the Western Australian Environmental Protection Authority (EPA), Department of Environment and Water (DEW) and Department of Mines, Industry, Resources and Safety (DMIRS).

Brockman has previously engaged Ecologia Environment (Ecologia) to prepare the Preliminary Documentation required to assess the project under the Environmental Protection and Biodiversity Conservation Act 1999 (Cth). Most key environmental approvals are in place and we shall adhere to our proposed plan in the event of commencement of early works. We endeavour to mitigate any environmental disturbance and apply our monitoring schedule when the project commercialises.

Prior to the commencement of our mine development, environmental approvals for mining or exploration activities are required to be sought in accordance with the Mining Act 1978 and the following approvals are required by the Department of Mines, Industry Regulation and Safety (DMIRS):

1. Programme of work — submission has to include details of mechanised equipment and potential disruption to the ground during exploration or prospecting for minerals.
2. Mining proposals — details of the proposed mining operation or any changes to be incurred are required to be disclosed.
3. Mine closure plans — such plan must be included together with any submission on mining proposals, covering all aspects of mine decommissioning and rehabilitation.

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## **Environmental compliance**

Ensuring environmental compliance is integral to the Group's operations. The Group implements environmental management systems and practices, from which we assess and identify potential environmental risks; conduct; monitoring; and report the performance results to mitigate the impact of our operations on the environment. The Group strives to promote the efficient use of resources and reduction and prevention of pollution. As a responsible Group we seek to meet, and where possible exceed, the regulatory requirements governing our environmental performance.

The Group complies with all applicable environmental laws, regulations, and standards. The main laws are set out in the Mining Act 1978 and other relevant environmental regulations such as the Environmental Protection Act 1986, the Environmental Protection and Biodiversity Conservation Act 1999, the Environmental Protection (Clearing of Native Vegetation) Regulations 2004, the Rights in Water and Irrigation Act 1914 and the Native Title Act 1993.

A number of management plans are in place to provide a framework for the Group to effectively manage its environmental impact and responsibilities. The plans are reviewed regularly and include the following:

- Safety management plans,
- Waste management plans, and
- Environmental monitoring plans.

The principal environmental incidents that could potentially occur at the Group's exploration sites include hydrocarbon spills; the destruction of local wildlife habitats; water substance levels exceeding permits limits; and other incidents that negatively impact the environment. Any environment incidents are reported, investigated, remedied and monitored by the Group and, where appropriate, reported to the responsible authorities.

During the year ended 30 June 2023, there were no environmental permit or approval breaches. All approval and permit levels were complied.

## **A.4 Climate Change**

Significant changes in the pattern of rainfall over Western Australia have occurred over the past 40 years. Most of the state, especially the northwest, has experienced a trend towards a wetter climate. This poses a certain risk for the mining industry. The southwestern part of the state has become drier, with a 15% reduction in rainfall since the mid-1970s.

Waste rock and tailings that are created during the mining and ore refining process can release toxins into the environment if not stored or disposed of properly. In many cases, waste rock and tailings are left out in the open where they are exposed, and toxins can be washed into water systems by rainfall, or can leach into the soil. To mitigate such risk, a detailed mine plan with enhanced tailings and erosion control structure will serve as part of the mine's water management plan.

The most likely source of impact to the surface water environment from discharge is from unplanned flooding or spillages at the sewage treatment facility. However, safeguards are in place to minimise this risk, including:

- Alarms and flashing beacons to warn of failure of mechanical components (pump and blower);
- Alarms to warn of high water levels in the balance tank or irrigation tanks; and
- An emergency overflow between the balance tank and the waste water treatment plant.

In addition, flood protection will be implemented, to ensure floodwaters do not adversely impact waste water facilities.



## B. SOCIAL

### B.1 EMPLOYMENT AND LABOUR PRACTICES

#### EMPLOYMENT

The Group's employment policies are documented in its Code of Conduct ("Code"), which provides clear guidance on the conduct and behaviour of all employees, including the Board and senior management. The Code is designed to encourage and foster a culture of integrity and responsibility with the focus on strengthening the Group's reputation as a valued employer, joint operator partner, and good corporate citizen. Specifically, the Code provides guidance on the following aspects:

- Compliance to laws, rules and regulations,
- Conflicts,
- Fair dealing,
- Knowledge and information security (including handling of confidential information and disclose and securities trading),
- Health, safety and environment,
- Employment practices, and
- Whistleblowing and misconduct reporting.

#### *Recruitment and promotion*

The Group recognises, and endeavours to protect, the rights of its employees and is committed to providing equal opportunities. The Group engages in transparent and fair recruitment practices and fair remuneration and disciplinary decisions without regard to gender, age, family position, or ethnic background. The remuneration provided for our employees is a basic salary component and other long-term incentives (where appropriate). The Group determines employee remuneration based on qualifications and experience. The Group provides employees with retirement benefits and healthcare benefits (where appropriate). We motivate employees by promotion and salary increments based on results of regular performance appraisals. Apart from offering employees' competitive salary packages, the Group also provides annual bonuses and the grant of share options to eligible employees as incentives to retain our employees.

#### *Compensation and dismissal*

Employees dismissal is based on the Hong Kong Employment Ordinance or relevant local laws and regulations in Hong Kong and Australia, as well as the requirements stipulated in the employment contracts.

The Group is committed to responsible corporate governance, including the implementation of measures to encourage employees and representatives of the Group to identify and report in good faith any concerns relating to serious misconduct which is, or potentially could be:

- A criminal offence (including theft, drug use/sale, violence or threatened violence and criminal damage to property),
- A breach of a legal obligation,
- Dishonest, fraudulent, or corrupt,
- A serious risk to the health of an individual, the public, the environment or the financial system,



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- In breach of any of the Group policies, or
- Designed to conceal business records or other evidence related to any of the factors above.

## *Working hours, rest periods and benefits*

A five-day work week arrangement is adopted to facilitate work-life balance. In addition to all rest days and statutory holidays as specified in local laws and regulations, employees are entitled to paid annual, maternity, paternity, marriage and compassionate leave. Employees are also entitled to benefits such as medical benefits, post-employment benefits subject to the Group's human resources management policy.

## *Equal opportunity, diversity and anti-discrimination*

All Directors, senior management and employees of the Group are expected to conduct themselves with integrity, openness, honesty and fairness, and in the best interests of the Company. The Group invests time and resources to fulfil its obligations under the respective laws of Hong Kong and Australia. The Group has a Whistleblower Policy that enables an employee to raise concerns about practices and procedures in their workplace. It enables employees to report concerns of fraud, illegal, immoral, illegitimate practices, misconduct, or malpractice in a way that will not be seen as being disloyal to colleagues.

## *Diversity*

The Company's recognition of the benefits of diversity where people from different gender, age, ethnicity and cultural backgrounds can bring fresh ideas and perceptions which make the workplace more efficient and it is reinforced in the Diversity Policy, a copy of which is available in the corporate governance section of the Company's website. This policy outlines specific diversity initiatives designed to facilitate equal employment opportunities and requires the Company to set out specific diversity initiatives and targets with the aim of reporting the progress towards the metrics in the annual report.

These key metrics include:

- Proportion of women appointed as Non-Executive Directors of the Company;
- Proportion of women in the workplace;
- Proportion of women in senior management;
- Parental leave return rates; and
- Employee turnover.

The following metrics shows the comparison to historical data. The historical data is as follows:

	2023	2022	2021	2020	2019
Proportion of women appointed as Non-Executive Directors	0	0	0	0	0
Proportion of women in the workplace	14%	13%	15%	15%	15%
Proportion of women in senior management	7%	7%	8%	8%	8%
Parental leave return rates	N/A	N/A	N/A	N/A	100%
Employee turnover	7%	0%	0%	0%	15%



The Board is continually looking to achieve diversity and will endeavour to appoint individuals who will provide a mix of experience, perspective and skills appropriate for the Group, including appropriate technical and commercial skills relevant to the mining industry.

In Hong Kong, the Group's employment regulations are governed by the Employment Ordinance, the Minimum Wage Ordinance, as well as the Employees' Compensation Ordinance and Mandatory Provident Fund Scheme Ordinance. In Australia, The Fair Work Act 2009 (Cth) governs the employment of the majority of Australian employees, supplemented by other federal, state and territory legislative instruments pertaining to areas such as work, health and safety and non-discrimination.

Total workforce:

	2023		2022	
<b>TOTAL WORKFORCE</b>		<b>14</b>		<b>15</b>
<b>By nature of work</b>	<b>Australia</b>	<b>Hong Kong</b>	Australia	Hong Kong
Corporate directors	3	5	3	6
Corporate Services	1	3	1	3
Project Development	—	1	—	1
Exploration	1	—	1	—
<b>Total</b>	<b>5</b>	<b>9</b>	<b>5</b>	<b>10</b>
<b>By gender</b>				
Male	4	8	4	9
Female	1	1	1	1
<b>By employee category</b>				
Directors (Executive)	1	2	1	2
Directors (Non-Executive)	2	3	2	4
Management	2	4	2	4
<b>By age group</b>				
31 - 50	1	3	1	6
50+	4	6	4	4
<b>EMPLOYEE TURNOVER RATE ANALYSIS</b>	<b>Australia</b>	<b>Hong Kong</b>	Australia	Hong Kong
<b>By geographical location</b>	<b>0%</b>	<b>10%</b>	0%	0%
	<b>Male</b>	<b>Female</b>	Male	Female
<b>By gender</b>	<b>10%</b>	<b>0%</b>	0%	0%
	<b>31-50</b>	<b>50+</b>	31-50	50+
<b>By age group</b>	<b>0%</b>	<b>10%</b>	0%	0%

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During the year, the Group was not aware of any material breaches of the relevant laws and regulations relating to the Group's compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare and had not received any substantial complaints from any individual or authority, nor has it paid or was liable to pay any penalty due to employment breaches.

## B.2 HEALTH AND SAFETY

The Company is committed to the development of a sustainable iron ore business in Western Australia that benefits its employees, contractors, suppliers, joint operator partner and the community. We will achieve this through the effective implementation and proactive management of our commitments and obligation to workplace health and safety, the environment and to the communities in which we operate. The Group goes above what is expected to comply with local health and safety legislation. The Group's Code of Conduct clearly communicates its attitudes and commitment towards protecting employee health and safety including conflict resolution and fair dealings.

To operate an effective and sustainable iron ore segment, the Company will:

- Focus on the elimination and management of workplace hazards and risks.
- Act ethically and responsibly in all its interactions.
- Promote a culture which focuses its employees, contractors, suppliers and joint operator partner in workplace health and safety as the responsibility of all those who work in its business.
- Provide a workplace free from bullying or discrimination and offering equal opportunity to all employees.
- Work actively through all areas of its business to minimise the actual and potential environmental impact of the Company's activities.
- Respect the rights of the traditional owners and value the indigenous cultural heritage associated with its operations.

We will implement systems and ensure that resources are allocated to implement and monitor these commitments and its legal obligations. Our employees, contractors and joint operator partner will be updated on the Company's progress towards these goals. The policy and the system that support it will be routinely measured to ensure the delivery of our commitments and system improvements made where the need arises.

The Group shall observe our Operational Health and Safety ("OHS") Policy for all our activities and our Company's health and safety objectives are summarised as follows:

- Achieve "Zero Harm" to people, the community and the workplace environment;
- Support, encourage and promote efforts to achieve industry-leading occupational health and safety performance;
- Eliminate or manage circumstances which may lead to injury, property damage and business interruption; and
- Achieve health and safety performance consistent with the OHS Policy.

These objectives will be achieved by:

- Providing employees and contractors with the necessary training and resources to assist them to perform their tasks safely and effectively;
- Establishing and enforcing accountabilities for employees and contractors regarding health and safety policy, objectives and performance;
- Complying with all applicable laws, regulations and statutory obligations;



- Demonstrating effective leadership and management of health and safety through risk assessment and the development and implementation of safe operational procedures and communication in health and safety issues.

During the year, the Group had no work-related fatality and injury resulting in lost days and in each of the past three years (2022: Nil) and the Group was not aware of any material breaches of the relevant laws and regulations relating to the Group providing a safe working environment and protecting employees from occupational hazards.

### B.3 DEVELOPMENT AND TRAINING

The Group is committed to fostering a culture of continuous learning in our organisation. We subsidise our employees for their continuing education, and encourage employees to participate in various workshops and seminars according to their respective areas of interest and job description.

Types of training to include:

- Compliance and regulatory;
- Job specific training;
- Comprehensive safety induction for all newly hired employees;

During the reporting period the percentage of trained employees and average hours of training received:

	Percentage of trained employees		Average hours of training received during the year	
	2023	2022	2023	2022
<b>By employment type:</b>				
Directors	57%	60%	173	183
Senior management	43%	40%	27	27
<b>By gender:</b>				
Male	86%	87%	184	194
Female	14%	13%	16	16

### B.4 LABOUR STANDARDS

Preventing and addressing the Group's own involvement in the use of child or forced labour in any of its operating segments is central to our current and future sustainability. The Group strictly prohibits the employment of child labour and forced labour and complies with all relevant laws and regulations. Prior to on-boarding of new employees, checks are conducted to ensure the candidate is of legal age of employment.

During the year, the Group has not employed any person under the age of 18 and incurrence of child labour is not a significant risk factor.

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## B.5 RESPONSIBLE SUPPLY CHAIN MANAGEMENT

The Group is committed to upholding human rights and respect cultures, customs, and values in all dealings with people, places, and companies involved in our activities. The Group strives to implement environmentally and socially responsible supply chain practices by working closely with all stakeholders including suppliers, local community, and the respective authorities.

The Group has established sound procurement procedures and requirement for vendors. Upon selection of new vendors, the Group will evaluate the vendors' performance, reliability and pricing. As part of our internal control on procurement procedures, at least 2 quotations will be obtained for each procurement engagement. Also, consideration of previous performance of the vendor, in terms of creditability and compliance with local regulations are determining factors for supplier selection. Sustainable, fair-trade and environmentally friendly products are preferred and procurement decisions are not solely based on price.

During the reporting period, the number of suppliers by geographical breakdown is as follows:

By geographical region	Number of suppliers	
	2023	2022
Hong Kong	17	15
Australia	43	42
<b>Total</b>	<b>60</b>	<b>57</b>

The Group engages external parties in its day-to-day operations including environment, process consultants, laboratories services, drilling services and professional services. To assist in maintaining a transparent supply chain, the Group only procures goods and services from suppliers and contractors whose trade, employment practices and company values are aligned to the Group.

Independent internal control consultants are engaged yearly to perform reviews on whether internal control processes are being observed. Compliance is actively monitored by procurement that identifies and reports any issues to the senior management. Any necessary action will be dealt with in a timely manner.

## B.6 PRODUCT RESPONSIBILITY

The Company will ensure all required documentation will be implemented prior to shipment of iron ore. Sinter testwork has provided positive results and confirmation of our product quality and the Group will strive to maintain the product's quality upon future delivery of ore.

Given that production has yet to commence, no complaints from customers nor product recalls have been received for the reporting period. Quality assurance and recall procedures will be duly implemented upon future delivery of iron ore product.



The Company upholds the confidentiality regarding customers', prospective customers' or business counterparts' information. Confidentiality agreements are put in place to protect any leakage of information and the Company's position on data security and privacy, including:

- Work related documents are the property of the Company unless otherwise specifically agreed,
- Destruction of documents containing confidential information must be carried out reliably.

The Company manages data protection and privacy as part of its IT processes and has several policies to manage IT related risks including off-site backup. Given the nature of our business, our operating segments do not involve the use of intellectual property rights owned by other parties. Nevertheless, the Group has set out the treatment of handling and protecting intellectual rights in our Code of Conduct.

During the year, the Group was not aware of any material breaches of the relevant laws and regulations relating to the Group health and safety, advertising, labelling and privacy matters relating products and services.

#### **B.7 ANTI-CORRUPTION**

The Company is committed to responsible Corporate Governance, including the implementation of guidelines and measures to encourage employees and representatives of the Company to identify and report in good faith any concerns relating to serious misconduct which is, or potentially could be a criminal offence, a breach of legal obligation, dishonest, fraudulent, or corrupt, a breach of the Company's policies (collectively, Inappropriate Conduct). Brockman takes a zero tolerance approach to corruption and bribery and is committed to acting professionally, fairly and with integrity in all our business dealings. Accordingly, the Board have endorsed a Whistleblower Policy to encourage and foster a culture of integrity

and responsibility within the Group. The Whistleblower Policy provides for protected disclosure, how to report Inappropriate Conduct, confidentiality, and Whistleblower protections. The stakeholders may wish first to discuss the alleged violation informally with their manager in order to determine serious misconduct has occurred. This is an opportunity to clarify the incident, ask questions, and at all times, it is expected that the discussions will remain confidential. Where a stakeholder believes that internal reporting is not appropriate, the Company encourages the stakeholder to report his or her concern to Brockman's Company Secretary and the Board. The Board will assess the situation and, if necessary, will communicate the reports of alleged violations to the Group's legal advisor. The Company Whistleblower policy is periodically reviewed by the Board.

There were no matters relating to Inappropriate Conduct and corrupt practices brought against the Group or its employees during the year (2022: Nil).

The Company has adopted a Securities Trading Policy which applies, inter-alia, to all Directors and executives. The Securities Trading Policy complies with ASX Listing Principles and the Mode Code for Securities Transactions by Directors of Listed Issuers (the "Model Code") as set out in Appendix 10 of the SEHK Listing Rules. All directors have confirmed, following a specific inquiry by the Company, that they have complied with the required standard as set out in the Model Code throughout the year ended 30 June 2023.

During the year ended 30 June 2023, reading material regarding "Update on Listing Rules and Corporate Governance Code and Anti-Corporation" was circulated to all directors of the Company.

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A copy of the Code of Conduct, Securities Trading and Whistleblower Policies are available in corporate governance section of the Company's website.

## **B.8 COMMUNITY INVESTMENT**

The Company is transparent on the need to earn the respect and support of the communities in which it is located and also by demonstrating a tangible level of commitment to environmental sustainability.

The Group operates in two regulatory environments (Hong Kong and Australia). While compliance with these regulatory environments are the basis of the Group's environmental management, the Group is committed to the principle of developing and implementing appropriate practices and will actively work to:

- Protect the environment surrounding its projects; and
- Give environmental aspects due consideration in all phases of our projects, from exploration, development, operation and final closure, and
- Act systemically to improve the planning, execution, and monitoring of its environmental performance; and
- Respect the rights of the traditional owners and value the indigenous culture heritage.

The Group is committed to operating in a way which contributes to the sustainable development of mineral resources through efficient, balanced and long-term management, while showing due consideration for the wellbeing of people, protection of the environment and the development of local economies.

The Group's Sustainability Policy seeks to ensure it is a constructive partner to advance the social, economic and institutional development of the communities in which it operates. The Group fully acknowledges the rights, cultures, customs, and values of people affected by the development and exploitation of mineral resources.

Brockman maintains its community focus on health and sports, and has sponsored charity runs/marathons for employees, for the purpose of raising employees' awareness on health while giving back to the community.