



INDUSTRY RESPONSE TO 'ENOUGH IS ENOUGH'
REPORT RECOMMENDATIONS



Industry Response to 'Enough is Enough' Report Recommendations

The mining and mineral exploration industry prioritises the safety, both physical and psychosocial, of our workers and workplaces. While our industry's safety standards are stringently regulated, ensuring safety, remains at the forefront of our operations.

AMEC members continue to implement a wide range of actions to address risks to the safety and wellbeing of our workers and workplaces, and are committed to eliminating sexual harassment, assault, bullying and discrimination from our industry.

AMEC is working with Government, other industry associations, and our member companies to address the unacceptable behaviours brought to light in the WA Parliamentary Inquiry into sexual harassment against women in the FIFO mining industry. Our response and ongoing actions have been developed in consultation with our membership, particularly through AMEC's Safety Committee and Respect@Work Working Group.

The below table outlines the breadth of actions already being taken by AMEC and AMEC member companies, which seek to address the recommendations of the 'Enough is Enough' Report.

'Enough is Enough' Report Recommendations	Responsible	Action
Recommendation 2: Mining and other resources companies need to ensure that there are serious repercussions, including dismissal, for any person who has attempted to seek sexual favours for advantage and that all proper legal actions will be taken against them.	Action being taken by AMEC	 AMEC has a zero-tolerance approach to sexual harassment, sexual assault, and other unacceptable behaviours in our workplaces, including discrimination and bullying. AMEC continues to work with members, other industry bodies and Government, to understand legal and procedural fairness requirements, to support industry in taking swift action to remove perpetrators and these behaviours from our workplaces. AMEC is supporting members in the development and sharing of procedures and processes available to pursue when allegations of misconduct arise.

Action being taken by AMEC Member Companies

- Development of standalone sexual harassment in the workplace policies and standards, clearly outlining zero tolerance to sexual harassment, bullying and discrimination.
- Education on what constitutes sexual harassment, how to report it, and supports available, shared with all employees and contractors in inductions, and in OHS policies.
- Updating of sexual harassment, discrimination, and bullying policies, standards, and response frameworks.
- Development of a harassment and discrimination standard and a grievance and dispute resolution standard.
- Updated existing counselling & discipline procedure outlining the processes for managing disciplinary matters, including option for summary dismissal should harassment occur.
- Development of Diversity & Inclusion Standard.
- Enhanced whistle-blower policies, expanded to encompass sexual harassment reporting.
- Surveys to understand employee and contractor behaviours, psychosocial hazards and workplace insights, followed by comprehensive campaigns to set expectations.
- Workplace investigation training for selected individuals.
- Roy Hill has rolled out the Above/Below the line behaviours program to all employees and contractors.
- Development of Organisational Change Action Plan to prevent and respond to inappropriate workplace behaviours, ensuring the company's culture and behaviours support a safe, respectful and inclusive workplace.
- Psychosocial safety built into daily meetings and work practices.
- Well-timed, organisation-wide communications regarding workplace behavioural expectations following an allegation of an incident.
- Inclusion of sexual harassment in the workplace policies and standards, and reporting options, shared with workers in induction packs and WHS policies.
- Review of trend-data (in a safety manner) including incidents, exit interviews, EAP data to inform development of policies and procedures

Recommendation 3: The industry must explore ways to prevent perpetrators of serious sexual harassment simply finding reemployment on other sites and in other companies. This should involve:

- thorough exploration of an industrywide workers' register or other mechanism such as industry-wide accreditation, taking into account natural justice considerations and perhaps modelled on the Working With Children Card; and
- ensuring probity checks across the industry include consideration of harmful sexual behaviours particularly for smaller companies and sub-contractors.

Action being taken by AMEC Action being taken by AMEC

- AMEC is working with other industry associations following legal advice, on a range of measures which can meet the intent of the proposed industry-wide workers' register. Consideration has been given to the use of vlountary declarations, information sharing provisions in line with privacy and industrial relations laws, policy measures, and suite of implementable, scalable, measures to strengthen recruitment and reference checking practices.
- AMEC is working with other industry associations to develop a range of measures companies can implement to bolster pre-screening and recruitment practices of prospective employees.
- AMEC is working with member companies to consider a range of recruitment practices for prospective industry employees to undertake, to ensure employees have been subject to a range of fit-for-purpose, relevant, vetting procedures prior to employment. This can include requiring a current National Police Clearance from prospective future workers (including employees and contractors), completing reference checks including a previous employer within relevant industrial relations parameters, and asking appropriate reference checking questions, such as 'would you hire this person again?' cognisant of privacy and Industrial relations laws.
- Exploring terminology for use in guidance materials to support the development of standardised templates, consistent definitions of sexual harassment, and fit for purpose investigations to substantiate claims.

Action being taken by AMEC Member Companies

- Some companies have introduced National Police clearance requirements for employees and contractors.
- All companies ensure serious repercussions are in place for unacceptable behaviours.
- Shift changeover meetings to include employees and contractors, with a focus on culture, standards, expectations of behaviour, with direct reference to what sexual harassment is, how to report it and the importance of reporting.
- Development of internal Risk and ESG subcommittees to report on progress of Respect@Work initiatives and any incidents, if applicable.
- Use of external investigators where required.

		 Bolstering reference checking and upfront screening of FTE and subcontractors, to ensure suitable candidates enter the industry. Corporate & Supplier Code of Conducts updated to reflect behavioural expectations in line with Company values and ethics. Performance management guidelines updated, including processes for the termination of workers for unacceptable behaviours, in line with IR laws. Grievance resolution procedure updated, outlining the Company's protocol for raising and responding to workplace grievances.
Recommendation 4: Mining companies must as a minimum implement moderate drinking standards for all FIFO accommodation sites.	Action being taken by AMEC	 AMEC is supporting members in their initiatives to reduce alcohol consumption and risks associated with alcohol consumption, and promote shifts towards non-alcoholic options, available to all mineral exploration and mining companies, to meet stringent fitness for work requirements, and support mentally healthy workplaces. AMEC members enforce stringently regulated fitness for work drug and alcohol testing. The introduction of alcohol limits and/or restrictions should be at the discretion of the organisation, considering the psychosocial welfare of industry's workforce, and the company's culture and ability to introduce and maintain measures. AMEC supports member companies who have mandated maximum alcohol limits. • AMEC's 'Resources Hub' will support members in initiatives to reduce alcohol consumption and risks associated with alcohol consumption, by promoting non-and-low alcohol alternatives, consideration of non-alcohol related on-site activities, by sharing industry best-practice initiatives. AMEC is seeking to collaborate with WorkSafe (Mines Safety) where possible, to develop guidance for non-owned FIFO accommodation, on 'alcohol alternative considerations'.

- Review and update of alcohol consumption and behavioural guidelines, with direct reference to individual and leadership expectations regarding consumption of alcohol
- Improved range of non-alcoholic options, with provision of free zero alcohol drinks, water, and soft drinks.
- Recreational facilities and social rooms in some new FIFO accommodation camps are being created away from a wet mess.
- Promoting inclusive workplace behaviours as an alternative to alcohol, by strong linkages to community and family programs.
- Introduction of alternative recreation offerings including health and wellbeing coordinators, personal trainers and state of the art gym for fitness options, tailored to shift patterns.
- Service of alcohol by swipe card mechanism only, to prevent stockpiling.
 - Introduction of baggage and / or vehicle searches.
- Mid-strength alcoholic beverages only.
- Reduced pricing for lower strength and alcohol-free options.
- Development of Responsible Alcohol Behavioural Guideline, outlining expected behaviours when consuming alcohol.
- Free of charge zero-alcohol options

Recommendation 5: While merely 'adding more women' to the mix is not enough to remedy cultural problems, mining companies need to improve the gender balance in their workplaces. Part of this must include greater effort to increase female workforce participation, with specific focus on site-level supervisor and management positions.

- AMEC is continuing to implement our Diversity and Inclusion action plan, focused on securing greater diversity and female representation in operational, leadership and executive management and Board roles.
- AMEC's Resources Hub is sharing company initiatives, including Mineral Resources Limited's 'Inspire' program, Gold Road's 'Care' program, and IGO's work to meet leadership targets.
- AMEC had developed a series of forums seeking to address challenges facing women in our industry, and build support for greater diversity in the sector.
- AMEC is advocating for a refresh of 2018 WA STEM Strategy with a 5-year review to promote greater diversity in mining and exploration, from school entrants.
- AMEC has and will continue advocating to WorkSafe (Mines Safety) to collect more accurate gender diversity data, by role and location, to gain an accurate understanding of the leadership and supervisory positions

Action being taken by AMEC **Action being** taken by **AMEC Member Companies**

- held by women, onsite July 2021 AMEC survey indicated 5%.
- AMEC supports developing women in industry via scholarships in leadership programs including the Women in Mining Network and Carnaby.
- AMEC has introduced two new diversity and inclusion award categories to <u>AMEC's annual awards</u> program in recognition of the need to encourage and celebrate diversity across industry.
- Atlas Iron has increased the diversity, including race, gender, age, work experience, thinking style of their workforce through recruitment processes.
- Integration with the community in which the mine operates to promote diversity and inclusion.
- MRL Inaugural Inspire Program launched 6-month program to develop frontline supervisors and to bring other women on the journey to develop into leadership positions.
- MRL: Leadership Essentials Program targets frontline leaders, recognising their direct influence on individual and team performance. Six modules focus on core leadership accountabilities and expectations.
- Fortescue Metals Group has a similar 'Inspire' program.
- Gold Road: CARE program: Leadership and upskilling program for female leaders.
- IGO's 'Culturing Program' has focused on increasing the representation and sponsorship of females across the business.
- In FY22 17% of IGO's promotions were females, as part of a strategy to change the gender balance and provide greater levels of female representation in decision-making roles.
- Members are increasing reporting by creating more diversity in on-site leadership roles.
- Statutory Supervisor training programs being developed with specific coverage of psychosocial risk management.
- IGO: extension of paid parental leave to 26 weeks for all parents regardless of gender, with paid superannuation on both paid and unpaid leave.

		 Some companies have gender / diversity & inclusion KPIs, including 30% female workforce; 50% shortlisting and interviewing of females where appropriate. Investments initiatives to increase gender representation include: career development and progression opportunities, flexible leave options, mentoring programs, annual gender pay equity reviews, remuneration equality, and unconscious bias awareness training
 Recommendation 6: The mining and resources sector actively work to reduce the risks which are exacerbated by high rates of labour-hire and sub-contracting. To ensure sexual harassment is addressed, safety management plans should: consider the appropriate proportion of labour-hire and contracted workforce; review monitoring and information sharing arrangements with all levels of contract partners; and establish clear requirements and quidelines for all contractors, which 	Action being taken by AMEC	 AMEC, through Parabellum International, has developed a range of explorer resources, our 'Explorer Reference Pack' under the WHS Peak Body Grant Program. Mine Safety Management Systems (MSMS) under r622 of the WHS (Mines) Regulations require all exploration and mining operations to develop and maintain a MSMS including health and safety policies, of which sexual harassment risk assessment, policies, response and gap analyses will be core. The MSMS requires control measures detailing the management of contractors and how they will adopt the Mine's MSMS, or integrate their own MSMS with the mine's. Through AMEC's Resources Hub, sharing best-practice ideas including briefings and training initiatives to improve culture for all workers, including contractors and direct employees.
	Action being taken by	 Reviews of induction processes for contractors, and updated to include Safe and Respectful behaviours, and bystander awareness.

AMEC Member Companies

directly address issues of sexual

harassment.

- Sexual harassment policies and standards of the mine operator, included in induction packs for contractors travelling to site.
- Some companies have undertaken surveys to understand employee and contractor behaviours, psychosocial hazards and workplace insights, followed by comprehensive campaigns to set expectations.
- Completion of psychosocial harm audits across operational sites, leading to the development of improvement plans, and awareness materials for leaders and workers.
- Some companies have shift changeover meetings now including employees and contractors, with a focus on culture, standards, expectations of behaviour, with direct reference to what sexual harassment is, how to report it and the importance of reporting.

- Annual survey of workforce including contractors, with a debrief on the findings from the survey to the entire workforce.
- Mandatory sexual harassment awareness workshops for all employees and contractors, to be completed within three months of commencing employment.
- Updated Mine Safety Management System to record, monitor and report on inappropriate workplace behaviours.
- Contractual requirements to report psychosocial harm to the mine operator within a specific timeframe, for service providers.
- Contractors participate in mandatory monthly toolbox meetings, at site or head office, with a different topic each month, recorded on the worker's training profile.
- Revised supplier pre-qualification process.
- 'Above and below the line' training shared with all construction contractors.
- Inductions updated to specifically address sexual harassment and bullying for all employees travelling to site.
- Increased alignment between physical and psychosocial safety.
- Creating of a set of demographics and behavioural questions to help monitor workforce trends.
- Contractor pre-qualification process to ensure alignment with company expectations. This can include questions of whether they provide their workers with training on respect at work.
- All persons entering the Company's exploration site for overnight travel are required to submit a national police clearance within 12 months of issue date.
- Induction training provided to contract partners.
- Workforce planning meetings to forecast staff requirements and reduce the use of labour-hire.
- Utilised AMEC's WHS Resources Hub to update policies and procedures for contractor management, under the MSMS.
- All individuals mobilising to site are required to complete induction training including Code of Conduct, Business Integrity, and Safe and Respectful Behaviours (SARB).

		 Detailed findings and outcomes from investigations; interrogating if a contractor has moved to another site following an investigation. Controls on contractor access to sites, following incidents. Contracts for subcontractors and labour-hire agencies updated with an emphasis on workplace safety and inclusivity policies and procedures. Education sessions for subcontractors and labour-hire agencies on responsibilities and duty of care relating to safe and respectful behaviours. D&I team presented to exploration team's quarterly contractor management workshop attended by 85 subcontractors.
Recommendation 7: Acknowledging the wide range of company size and capability, the large mining companies and representative bodies should develop a template/framework to assist all companies to review their workplace culture, processes, and work and living conditions to identify factors which allow sexual harassment to persist.	Action being taken by AMEC	 AMEC's Respect@Work Working Group invited all our WA-based producing members to participate, communicate, and develop best-practice initiatives and resources to shared on the AMEC Resources Hub, that all companies can consider implementing if suitable to their own operations. AMEC's explorer resources include sexual harassment risk assessments and / or checklists, providing considerations for mineral explorers and other mining and associate companies with non-owned FIFO accommodation facilities. AMEC has been and will continue facilitating conversations and introductions between companies and service providers, to address psychosocial hazards in the workplace.
	Action being taken by AMEC Member Companies	 Sexual harassment risk assessments and audits have been conducted at site, to identify gaps and higher risk areas. Safety culture surveys with direct questions about harassment. The proactive use of Employee Assistance Programs (EAP) in undertaking risk and psychosocial hazard assessments; in addition to increased access to EAP for workers. Desktop analyses of employee experience data to identify potential prevalence and risk of bullying, harassment, discrimination and disrespectful behaviours, with a final report leading to targeted actions to drive change. Formation of Respect Focus Groups to further understand the main

		 themes arising from analysis. IGO established a multi-disciplinary Sexual Harassment Working Group to supplement resources dedicated to addressing and/or eliminating sexual harassment, ensuring a wide range of opinions and perspectives are considered, across the business. IGO developing a new standalone sexual harassment procedure, to specifically outline inappropriate workplace conduct, legislation, internal processes for reporting, investigation, and potential outcomes. Development of a company-wide working group and reference group comprised of members from all areas of the business to ensure psychosocial hazards are addressed from all angles. Gender safety audit focus group to inform lived experiences of females, on site. Employee engagement survey for entire workforce to gain insight into the views and opinions of all employees, including psychosocial hazard questions.
Recommendation 8: The mining and resources industry must establish acceptable standards for accommodation facilities, including security and other safety measures (including lighting, locks, CCTV, public area layouts).	Action being taken by AMEC	 AMEC's Resources Hub will share physical safety considerations and initiatives undertaken by member companies. AMEC's explorer resources will include a sexual harassment risk assessment gap analysis for explorers, also relevant to mining operations. AMEC will support members in implementing risk-based controls and measures, with risk management techniques commensurate to the risk posed. Companies should have the flexibility to meet security expectations, suitable and relevant to their operation. AMEC, through MAPAC, will work with Government, employer groups and the broader Industry to develop an accommodation facility Code of Practice.
	Action being taken by AMEC Member Companies	 Psychosocial hazard risk assessment built into risk assessment process, with a focus on new exploration projects and areas, including non-owned accommodation facilities.

- Following sexual harassment risk assessments and audits, the following upgrades have been facilitated:
 - Security upgrades including the replacement of locks on accommodation doors, improved lighting, increased security and CCTV, identifying suitable areas for long-dated recording capability, and increased emergency communication infrastructure in areas identified as higher risk.
 - Construction of new FIFO accommodation facilities can include single person rooms and ensuites, no centrally located wet mess, and female only areas.
 - Establishment of risk registers relating to psychosocial harm factors.
 - Gender safety audits across owner-operator sites including physical work environment risk and safety assessment, focus group sessions for all female employees, workforce-wide employee engagement surveys with a final report presented to the Board.
 - Review of general camp facilities, including women's only gym, and dining and recreation areas.
 - Conducted female focus groups at operations to better understand the needs of females on remote sites, leading to actions for improvement.
 - Use of mobile CCTV units.
 - Revised camp rules, room policy.
 - Revised room booking and allocation system.
 - Revamped village security via capability, processes, and uniforms.
 - Development of security hotlines.
 - Psychosocial harm audits conducted to identify gaps in systems and processes for the management of psychosocial hazards.
 - Security upgrades for smaller camps, based on larger mining operations' upgrades.

Recommendation 9: The industry should ensure that sexual harassment and assault training is accredited, fit for-purpose, and delivered by suitable practitioners.

- AMEC supports quality training, whether it is developed in-house or not, acknowledging the maturity of training available and in use.
- Sexual harassment and sexual assault training should be provided to all industry members, with flexibility of the mine operator to select a trainer, suitable to the nature and location of the project.

Training should be mandatory and ongoing for all employees. There should be additional specialist training for people who must formally respond to incidents.

- AMEC's Resources Hub features a range of training modules, courses and providers our members are currently using.
- AMEC supports the use of specialist training for responders to incidents, and investigators of allegations, via fit-for-purpose training.
- Through the WA Government's Mental Awareness, Respect and Safety (MARS) initiatives, AMEC is contributing to the development of training resources available to industry
- Many members have updated their education and awareness programs, on-site and in head offices, to provide a consistent understanding of what constitutes sexual harassment, what to report, who to report it to, and how reports can be made.
- Updating reporting frameworks and education processes to include workplace examples and raise awareness, clarifying definitions, utilising SafeWork Australia resources and the Sexual Assault Resource Centre (SARC).
- The use of regular 'toolbox' meetings onsite and in head offices with a focus on harassment and bystanders as a topic, safety culture surveys with direct questions about harassment.
- CEO attendance at every new employee induction.
- Review of below the line behaviours (incidents) in weekly business performance meeting.
- Training and development of supervisors and front-line managers to prevent, manage and address sexual harassment risks, reports and incidents has increased, as well as training on unacceptable behaviours including bullying and harassment.
- Training of Health and Safety Representatives to lead discussions on psychosocial hazards and Respect@Work within the workforce.
- Increased frontline HSE and HR interactions with workers.
- HR training for all people leaders, including reporting and responding to incidents, how to manage difficult situations, and general best practice people management.
- Mental Health First Aid Training for leaders and all employees at some companies, with some sites receiving mental health first aid gold accreditation.
- and enable people in meeting values and behavioural expectations.

- Introduction of unconscious bias training.
- Updated training for Equal Employment Opportunity contact officers
 within the business, available as protected persons within the company to
 support employees with EEO queries or support.
- Leadership development program for onsite leaders, to reinforce, embed
- Peer support training revised to include sexual harassment and sexual assault modules.
- Communication with insight, and behaviour training modules.
- Set up consistent training schedules and registers for greater recordkeeping.
- Training modules on conflict resolution and having difficult conversations.
- Mental health initiatives to create mentally healthy workplaces, including R U OK Day campaign, with presentations across all operational sites by chosen Mental Health Advocate, R U Okay Day pre-start presentations.
- Mental health awareness presentations.
- Inductions updated to specifically address sexual harassment and bullying for all employees travelling to site.
- Bystander and upstander training.
- Training on Whistleblower policy to encourage reporting of unacceptable behaviours and reinforce multiple avenues of reporting
- Companies now offering refresher training.

Recommendation 16: Mining companies establish a number of internal and external options for reporting and obtaining support for incidents of sexual harassment and assault. All employees must be informed of these options.

- AMEC supports all companies having multiple reporting mechanisms and people available to make reports to, including formal reporting mechanism.
- AMEC recommends all companies have 'anonymous' reporting platforms available.
- AMEC has facilitated introductions and briefings between CrimeStoppers 'Safe2Say' team and members, for anonymous reporting platforms. Many members are now using this platform.
- Supporting members in increased education and training on what information to provide when making an anonymous report, to encourage increased reporting.
- AMEC's Resources Hub will feature an information page on available support mechanisms available, including 1800RESPECT, SARC.

Action being taken by AMEC Member Companies

- Increasing the number of trained on-site staff members reports can be made to, including contact officers.
- Considering the use of integrity reporting platforms (including Safe2Say).
- Specialist-trained HR and leadership teams to appropriately manage reports and provide support, whilst offering multiple options to encourage reporting.
- Increased HR presence on site to promote engagement with diverse groups on site.
- Education processes to include workplace examples and raise awareness.
- Reporting via multiple avenues including Ethics Officers, Chaplains, HR, EAP, anonymous reporting line, and peer support workers.
- Onsite Chaplains, to provide a dedicated pastoral care service.
- Utilising SafeWork Australia resources and the Sexual Assault Resource Centre (SARC).
- The use of 'toolbox' meetings in head offices with a focus on harassment and bystanders as a topic.
- Onsite psychology services for casual drop-in conversations, with more formal 'lunch and learn' sessions.
- Development of a diversity and inclusion team with members from across the business reporting directly to the Managing Director, to understand concerns and drive solutions with a positive impact across each site within the workforce, relevant to the location, community and staff.
- Training and development of supervisors and front-line managers to prevent, manage and address sexual harassment risks.
- Training and development of peer-to-peer support, to encourage conversations.
- Training on unacceptable behaviours including bullying and harassment.
- Developing triage processes to explore complaints.
- Review of business medical provider.
- Review of fitness for work and health & wellbeing standards.
- Internal reporting hotlines, with 24/7 availability.
- Education on what information is required when making an anonymous complaint.