

Deep Yellow Limited (ABN 97 006 391 948)

Vimy Resources Pty Ltd (ABN 56 120 178 949)

Mulga Rock Project

Compliance Assessment Report

Ministerial Statement 1046

Condition 4-6

Reporting Period: 16 December 2023 to 15 December 2024

March 2025



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1 Introduction

1.1 Ownership

The owner of the Mulga Rock Project (MRP or Project), and the registered holder of the tenements associated with the Project, is Narnoo Mining Pty Ltd (ABN 81 084 713 100) (Narnoo). Narnoo is a 100% owned subsidiary of Vimy Resources Pty Ltd (ABN 56 120 178 949) (Vimy). Vimy is the Proponent for the Ministerial approval under the *Environmental Protection Act 1986* (WA) (EP Act), and the Commonwealth Ministerial approval under the *Environmental Protection and Biodiversity Act 1999* (Cth) (EPBC Act). Vimy is a 100% owned subsidiary of Deep Yellow Limited (ABN 97 006 391 948) (Deep Yellow or Company). Deep Yellow is listed on the Australian Securities Exchange and is the ultimate holding company in the Deep Yellow group of companies, which includes Vimy and Narnoo.

1.2 Location

Vimy is developing the MRP located approximately 290 km by road east-northeast of the regional mining city of Kalgoorlie-Boulder in the Shire of Menzies in Western Australia (refer Figure 1). The MRP lies on two granted Mining Leases (M39/1104 and M39/1105) and associated Miscellaneous Licences (refer Figure 2). The Project is located within Unallocated Crown Land on the western flank of the Great Victoria Desert. The nearest residential town is Laverton which is approximately 200 km to the northwest.

Other regional residential communities include Pinjin Station Homestead, located approximately 100 km to the west; Kanandah Station Homestead, about 150 km to the southeast; Tropicana Gold Mine approximately 110 km to the northeast, and Mt Margaret Community, around 337 km to the northwest.

1.3 Project Description

The MRP is the largest advanced uranium project in Australia with the required approvals to proceed into operations and with acknowledgement of substantial commencement in 2021 from state and Commonwealth regulatory agencies. The Department of Energy, Mines, Industry Regulation and Safety (**DEMIRS**) approved development at MRP East (Ambassador and Princess deposits) in 2021. Further details of the approvals are provided in Section 1.4.

The MRP has an ore reserve of 22.7 Mt at ~845 ppm Uranium Oxide (U_3O_8) for 42.3 Mlb U_3O_8 (ASX announcement 4 September 2017). The ore reserve is a subset of the mineral resource which stands at 115.1 Mt at 420 ppm U_3O_8 for a contained 104.8 Mlb U_3O_8 at a cut-off of 100 ppm U_3O_8 (ASX announcement 26 February 2024).

The Project is made up of the MRP East mining area, comprising the Ambassador and Princess deposits, and the MRP West mining area comprising the Shogun and Emperor deposits.

The two separate mining areas cover a total length of 30 km with the individual deposits ranging in length from 1 km to 8 km. The ore zones are up to 38 m thick at Mulga Rock East with an average thickness of 4.5 m, and up to 8 m in thickness at Mulga Rock West with an average of 2.4 m.

Uranium mineralisation is hosted by flat-lying, carbonaceous clastic sediments which are in turn overlain by weathered, oxidised sediments that range in thickness from 19 m to 62 m forming the waste overburden. Owing to the nature of the host rock and overburden, the majority of the mining will be done by free digging, with only a small requirement for drill and blast of cemented, silica-rich layers.





Figure 1: Mulga Rock Project Regional Location



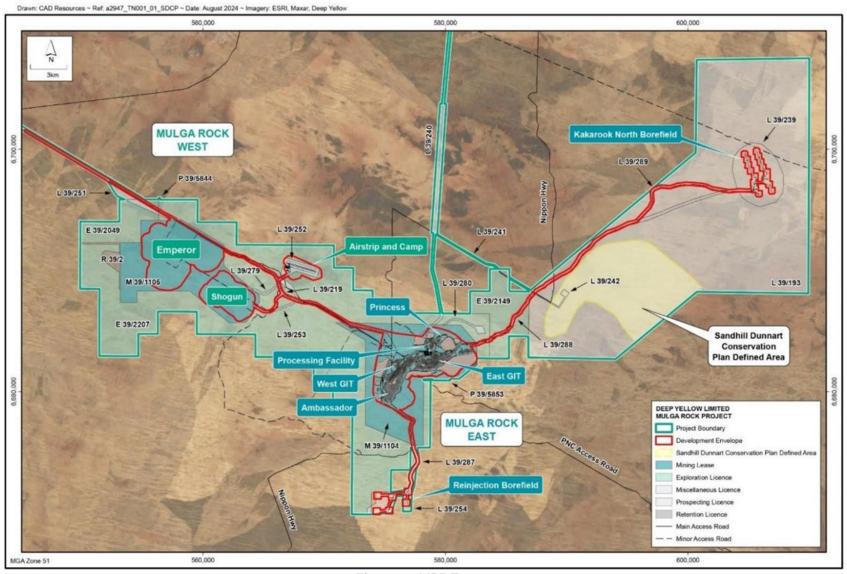


Figure 2: MRP Tenure

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The deposits will be mined in large-scale open pits to produce an annualised peak capacity of 2,180 t/a (4.8 Mlbs) of Uranium Oxide. Due to the large lateral extent and horizontal geometry of the deposits, it is proposed to use 'strip' mining techniques similar to those used in mineral sands and coal mining. Strip mining commences with the excavation of an initial box cut to expose the ore, with the overburden placed in a surface landform. After mining the ore exposed by the first slot cut, the resulting pit void will be available to take the overburden from the next mining strip as mining moves along strike. In general, mining advances one strip at a time with previously mined areas progressively backfilled and rehabilitated. This mining method will allow progressive rehabilitation resulting in a small disturbance footprint at any given time and significant savings in waste rock movement and rehabilitation costs.

1.4 Approvals

A Public Environmental Review (**PER**) for the MRP was submitted to the Western Australian (WA) Environmental Protection Authority (**EPA**) in June 2015. The assessment process for the PER was undertaken under a bilateral agreement between the State of Western Australia and the Commonwealth Government. The assessment found that no residual environmental impact would result from the Project and all temporary impacts could be effectively managed through environmental conditions.

The PER was endorsed by the EPA on 25 August 2016 and the State of Western Australia granted Ministerial Approval for the MRP under s.45(5)(b) of the EP Act on 16 December 2016, Ministerial Statement No. 1046 (**MS 1046**). The Australian Commonwealth Government (then Department of the Environment and Energy and now known as the Department of Climate Change, Energy, the Environment and Water [DCCEEW]) granted final approval for the MRP under s.133 of the EPBC Act on 2 March 2017 (EPBC 2013/7083).

Vimy on the 17 September 2021 notified the Department of Agriculture, Water and Environment (**DAWE**), now known as the DCCEEW, in accordance with Condition 4 of Ministerial Environmental approval (EPBC 2013/7083) of the commencement of the action on the 10 September 2021. DAWE noted on 1 October 2021 that the action had commenced and advised under Condition 6 EPBC 2013/7083 the first Annual Compliance Report is due on the 10 December 2022.

Notification of substantial commencement, as defined in EPBC 2013/7083, was provided to the DWER on the 25 November 2021 and further supporting information on the 15 December 2021, as required by condition 3-2 of MS 1046. DWER acknowledged the substantial commencement in correspondence dated 16 December 2021: "The Department of Water and Environmental Regulation has reviewed the information provided and considers the requirements of conditions 3-1 and 3-2 of MS 1046 have been met".

The Mining Proposal (Reg. ID: 92188) and Mine Closure Plan (ID 8648407) for Mulga Rock Project East was approved by the (then) Department of Mines, Industry Resources and Safety (**DMIRS**) now known as the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS), on 29 September 2021.

On 17 March 2022, Narnoo submitted an application for a works approval to the DWER under section 54 of the EP Act for the construction of two wastewater treatment plants and a putrescible landfill facility. DWERS's approval (Works Approval Number W6678/2022/1) was received on 14 December 2022 for the following:

• Category 54: Sewage Facility. Consisting of waste water treatment plants and irrigation sprayfields at the Accommodation Village and Mine Support area.



- Category 89: Class II putrescible landfill site.
- Hydrocarbon and chemical storage.

On the 5 December 2023 the DCCEEW issued a variation of conditions attached to the approval EPBC 2013/7083. The variation was the deletion and substitution of condition 6 (principally relating to the reporting period, so as to align with the state compliance reporting period) and adding more definitions. The DCCEEW letter and variation notice is available on Deep Yellow's website¹.

A Sandhill Dunnart Conservation Plan (**SDCP**) was developed in consultation with the Department of Biodiversity, Conservation and Attractions (**DBCA**) and was submitted on the 10 November 2022 and approved by the DCCEEW on the 31 January 2023. A revised SDCP (Version 6) submitted on 29 January 2024 was approved by the DCCEEW on the 19 July 2024 (Deep Yellow, 2024).

A revised Operational Radiation Management Plan (RM-809-555945) and Radiation Waste Management Plan (RM-796-558948) were issued by Deep Yellow in January 2024 and approved by DEMIRS on 4 April 2024 in accordance with the Mines Safety and Inspection Regulations 1995.

On the 19 August 2024 the Class II putrescible landfill was included as a registered premises on DWER's register (R2560/2024/1) under regulation 5B of the Environmental Protection Regulations 1987 (**EP Regulations**).

1.5 Compliance Assessment Report Requirement

Under the approval conditions of MS 1046 Condition 4-6 (see below) the Proponent is required to submit to the CEO of the DWER a Compliance Assessment Report (**CAR**) annually from the date of submission of the first Compliance Assessment Report.

Condition 4-6 states:

The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall:

- (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf:
- (2) include a statement as to whether the proponent has complied with the conditions;
- (3) identify all potential non-compliances and describe corrective and preventative actions taken;
- (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and
- (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.

¹ https://deepyellow.com.au/projects/australia/mulga-rock-project/approvals-and-compliance/.



This CAR has been prepared in accordance with the Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012).

This is the eighth CAR submitted and covers the reporting period from 16 December 2023 to 15 December 2024 (reporting period).

This report includes:

- Section 1 Introduction.
- Section 2 Project Implementation Status.
- Section 3 and Appendix 1 Statement of Compliance.
- Section 3.1 and Appendix 2 Details of Declared Compliance Status MRP Audit Table.
- Section 4 Compliance status of Environmental Monitoring and Management conditions / requirements and associated environmental monitoring and management plans that are required within the Ministerial approval under the EP Act, and the Commonwealth Ministerial approval under the EPBC Act. These Plans are the:
 - Aboriginal Heritage Management Plan (AHMP) (Management-based Condition Environmental Monitoring Management Plan [CEMP]) (EHS-EMP-003), Revision 1.1 – approved by the DWER on 3 January 2020;
 - Flora and Vegetation Monitoring and Management Plan (FVMMP) (Management-based CEMP) (EMP-EHS-001), Revision 1.2 – approved by the DWER on 20 February 2020;
 - Terrestrial Fauna Monitoring and Management Plan (TFMMP) (Management-based CEMP) (EMP-EHS-002), Revision 1.2 approved by the DWER on 20 February 2020;
 - Groundwater Monitoring and Management Plan (GMMP) (Management-based CEMP) (EHS-EMP-004), Revision 1.4 – approved by the DWER on 6 May 2020;
 - Soil Monitoring and Management Plan (SMMP) (Outcome-based CEMP) (EMP-EHS-004), Revision 1.4 – approved by the DWER on 1 September 2020;
 - Soil Monitoring and Management Plan (SMMP) (Management-based CEMP) (EHS-EMP-010), Revision 1.3 – approved by the DWER on 1 September 2020; and
 - Sandhill Dunnart Conservation Plan (SDCP), Revision 6 approved by the DCCEEW on 19 July 2024 (approval is included in Appendix 3).

The following CEMPs have not been implemented to date as there is currently no processing of the ore and no Tailings Storage Facilities (**TSF**s) on-site:

 Tailings Storage Facility Monitoring and Management Plan (Outcome-based CEMP) (EMP-EHS-008), Revision 1.4 – approved by the DWER on 28 August 2020; and



 Above Ground Tailings Storage Facility Monitoring and Management Plan (Outcome-based CEMP) (EMP-EHS-009), Revision 2 – approved by the DWER on 7 April 2021.

Based on the status of the Project implementation (refer Section 2), some of the CEMPs management and monitoring requirements have been partially or wholly implemented as required. The status of management and monitoring programs is discussed in Section 4 Monitoring and Management.

- Section 5 Raw Data.
- Section 6 Proposed Changes.
- Section 7 Abbreviations and Units of Measure.
- Section 8 References.
- Appendices.

1.6 Other State and Commonwealth Compliance Reports and Management Plans

All State and Commonwealth compliance reports and other statutory required documents are publicly available on Deep Yellow's website² and can be referred to in conjunction with the CAR. These include:

- Public Environmental Review, December 2015;
- State and Commonwealth Government approvals;
- Conditional Environmental Management Plans;
- WA Compliance Assessment Reports;
- Commonwealth EPBC 2013/7083 Annual Compliance Reports; and
- Sandhill Dunnart Conservation Plan (SDCP).

The DEMIRS Annual Environmental Report (**AER**) is an on-line report, and therefore is not included on Deep Yellow's website, however the information is available from the AER Submission Search page of the DEMIRS website³. The AER documents:

- mining activities for the reporting year and proposed activities for the following year;
- environmental management and rehabilitation activities for the reporting year, and proposed activities and developments in the following year;
- progress and status of achieving environmental outcomes and closure objectives for the site, including the provision of relevant monitoring reports or data; and
- assessment of compliance with conditions.

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² https://deepyellow.com.au/projects/australia/mulga-rock-project/approvals-and-compliance/

³EARS 2



2 Project Implementation Status

Following the merger with Vimy Resources in August 2022, Deep Yellow identified the possibility for significant project value uplift and is currently undertaking further evaluation into the mineralised material in order to optimise the plant design, improve project viability, extend life of mine and increase resource utilisation. In this context the processing operation previously proposed by Vimy is being reviewed by the Deep Yellow technical team, who have extensive experience in uranium and critical minerals processing operations. The MRP East remains within the existing approvals and Development Envelope. Therefore, project progress since the merger has focused on revising the Definitive Feasibility Study to encompass the evaluation prior to further development at the site.

The compliance status of the Project's key characteristics stated in the PER and MS 1046 are provided in Table 1.

Table 1: Compliance Status of MRP Key Characteristics as of 15 December 2024

Element	Description	Status*	Comment
Disturbance Footprint	The Development Envelope for the Project covers an area of 9,998 ha. Within the Development Envelope, it is proposed to disturb up to 3,787 ha (Disturbance Footprint).	С	As at the end of the reporting period the disturbance footprint within the Development Envelope is approximately 309 ha (reconciled after spatial data entry into the site's GIS, previously reported as 550 ha, calculation now excludes historical disturbance that proceeds MS1046 approval, with the majority being historical exploration). Disturbance tracked and recorded via Ground Disturbance Activity Permit (GDAP) process and GIS.
Open cut mine pits	Clearing of no more than 2,374 ha within the 9,998 ha Development Envelope.	С	Open Cut Mine Pit area disturbance within the Development Envelope is approximately 178.6 ha (reconciled after spatial data entry into the site's GIS, previously reported as 193 ha, calculation now excludes historical disturbance that proceeds MS1046 approval). Disturbance tracked and recorded via GDAP process and GIS.
Associated Infrastructure	Clearing of no more than 1,307 ha within the Development Envelope.	С	Disturbance for roads, pipelines, topsoil stockpiles, exploration drilling areas within the Development Envelope is approximately 130.4 ha (reconciled after spatial data entry into the site's GIS, previously reported as 357 ha, calculation now excludes historical disturbance that proceeds MS1046 approval). Disturbance tracked and recorded via GDAP process and GIS.
Backfilling of mine pits with waste as part of progressive rehabilitation	Backfilling of pits to a height of at least 10 m above the water table.	NR	Not required at this stage of the Project.
Above-ground TSF	Clearing of no more than 106 ha within the Development Envelope.	NR	No clearing undertaken for the TSF. Not required at this stage of the Project.



Element	Description	Status*	Comment
Tailings disposal	Disposal of no more than 3 Mtpa of beneficiation rejects and no more than 2 Mtpa of post-leaching tailings material.	NR	Not required at this stage of the Project.
Water abstraction	Abstraction of no more than 3 GL/a from the Kakarook North Borefield.	NR	The Kakarook North Borefield, has not been developed, and is not required at this stage of the Project. It still requires a water abstraction licence and has had no water abstraction to date.
			South of the Kakarook North Borefield there are two water extraction bores in-place. Both bores come under a licence to take water GWL203514(3), with an annual entitlement of 135,600 kL, of which during the last licencing period (1 November 2023 to 31 October 2024), 1,353 kL was extracted.
Mine dewatering	Dewatering of Emperor, Shogun, Princess and Ambassador pits up to 2.5 GL / annum.	NR	Not required at this stage of the Project.
Water reinjection	Reinjection up to 1.5 GL / annum at the reinjection borefield.	NR	Not required at this stage of the Project.

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage.

2.1 Activities

The activities undertaken for the MRP during the reporting period have included:

- Submission of AER, CAR and ACR for 2023 reporting periods.
- Submission of the Mine Rehabilitation Fund (MRF).
- Revision and submission of the Sandhill Dunnart Conservation Plan (SDCP) in January 2024 for the DCCEEW approval.
- Preparation of a Mine Closure Plan revision for submission to DEMIRS in March 2025.
- Revision of the Ground Disturbance Activity Permit (**GDAP**) and Procedure with the inclusion of more Aboriginal heritage requirements.
- Implementation of a GDAP Procedure.
- Compliance audit by the DWER in September 2024 (DWER, 2024) of the conditions within MS 1046 and Flora and Vegetation Management and Monitoring Plan, the Terrestrial Fauna Management and Monitoring Plan and the Aboriginal Heritage Monitoring Plan.
- Installation of the site's new Class II Putrescible Waste Landfill in accordance with Works Approval W6678/2022/1 requirements and with submission of the required documents for DWER approval.



- Monitoring of weather, Sandhill Dunnarts (SHD), feral animals, soils, depositional dust, groundwater levels and quality, and weeds.
- Installation of soil/vegetation health monitoring points.
- Improvements in data management (i.e. environmental database and geographical information system [GIS]).
- Review of the Legal Obligations and Compliance Register.
- Rehabilitation of the areas disturbed by the 2022-2023 drilling program (total of 719 aircore holes).
- Groundwater management, including:
 - Execution of a comprehensive hydrogeological investigation comprising exploration drilling, downhole geophysical logging, drilling and construction of four test production, 31 monitoring bores and two fully grouted vibrating wire piezometers to facilitate an aquifer testing programme across the Ambassador and Princess Deposits.
 - Installation of protective headworks and concrete blocks at 21 historic cased mineral exploration holes that were deemed to be suitable for inclusion into an expanded groundwater monitoring network.
 - Completion of step rate and subsequent constant rate pumping tests at the four test production bore sites.
 - Completion of 26 airlift recovery tests, 12 falling head tests, 9 short-term constant rate tests at various monitoring bores constructed during the hydrogeological investigation programme.
 - Deployment of 10 manual download water level data loggers together with one dedicated barologger across the Ambassador and Princess Deposits with one instrument deployed at the Kakarook North borefield and one at the Injection borefield.
 - O Deployment of four telemetry linked water level data loggers across the Ambassador Deposit.
 - o Review of all test production and monitoring bores.
 - Collection of groundwater samples for comprehensive chemical analysis from all completed test production and monitoring boreholes installed (circa 40 samples).

3 Statement of Compliance

During the reporting period 16 December 2023 – 15 December 2024 the Company was compliant with <u>all</u> ministerial conditions associated with MS 1046. A Statement of Compliance has been prepared in accordance with the OEPA's Post Assessment Form (2012) and is presented in Appendix 1.



CARs are publicly available on Deep Yellow's website⁴, in accordance with Condition 5 of MS 1046 and with the OEPA Post Assessment Guideline for Making Information Publicly Available (OEPA, 2012a).

3.1 Details of Declared Compliance Status

The declared compliance status of each condition is presented in the MRP Statement No. 1046 Audit Table presented as Appendix 2.

3.2 Supporting Information

The following supporting information for the CAR is presented in the appendices:

- MRP Audit Table (Appendix 2).
- DCCEEW Approval of Sandhill Dunnart Conservation Plan (Appendix 3).
- Sandhill Dunnart and Feral Species Image Analysis (GHD, 2025) (Appendix 4).

4 Environmental Monitoring and Management

During the reporting period monitoring was undertaken on climate, air quality, groundwater, soils, flora, vegetation and fauna. Analysis and results from specific monitoring programs undertaken during this reporting period are included in the sections below.

4.1 Environment Induction

The site's Environment and Community Relations Induction (MRO-ENV-PP-008) contains detail on the following topics:

- Environmental policy
- Environment duty of care
- Statutory approvals
- Great Victoria Desert and MRP
- Climate
- Vegetation significant vegetation communities E3 and S6
- Vegetation clearance restrictions
- Conservation significant flora
- Native and feral fauna
- Sandhill Dunnart
- Land management
- Water management
- Air quality management

⁴ https://deepyellow.com.au/projects/australia/mulga-rock-project/approvals-and-compliance/



- Hydrocarbon and chemical management
- Waste management
- Environmental incidents
- Community relations policy
- Aboriginal Heritage.

The Company's database induction records show that during the reporting period a total of 106 people (consisting of 31 employees and 75 contractors and visitors) have successfully completed the Environment and Community Relations Induction (MRO-ENV-PP-008) and its assessment.

4.2 Data Management

4.2.1 Database

Continuous improvement in the management of environment data in the temporal environment database, MonitorPro (EHS Data Limited) occurred during the year.

4.2.2 Geographical Information System

The geographical information system (GIS) includes spatial data on:

- current and proposed infrastructure;
- vegetation and soils mapping;
- fire history;
- priority listed flora locations;
- Development Envelope boundary;
- dust, soil, groundwater, vegetation health and long-term vegetation monitoring site locations;
- Ground Disturbance Activity Permit (GDAP) proposed and actual clearance;
- land clearance in relation to E3 and S6 vegetation communities; and
- rehabilitated areas based on the terminology used in the MRF:
 - Stage 1 Preliminary Earthworks
 - Stage 2 Completed Earthworks
 - Stage 3 Revegetation
 - o Stage 4 Relinquished.

Deep Yellow's GIS continues to be improved with the latest development being a web-based dashboard that links with the GIS. The dashboard provides a view of the environmental impact of mining operations for the MRP; promoting transparency with regards to operational and clearing activities. It summarises granted clearing permits, disturbance areas, and rehabilitation progress, providing key insights tailored for MRF and AER reporting. The information displayed is sourced from the Spatial Database system and updates in real-time, ensuring the latest information is always available. The information currently available on the dashboard is as follows:



- Clearing permits (illustrated in Figure 3)
- Ground disturbance
- Vegetation monitoring
- Rehabilitation
- MRF Report
- AER

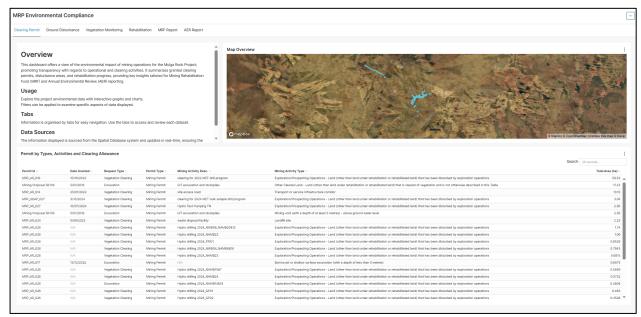


Figure 3: Example of GIS Dashboard Showing Clearing Permit Data

4.3 Climate

Three weather stations operated at the MRP Airstrip, Emperor and Shogun areas from February 2009 through to when they malfunctioned and data stopped recording in May 2021. These three stations were then decommissioned with all available data downloaded.

A replacement EWS Australia automatic weather station was installed in mid-October 2023 at the MRP Airstrip (WS01), with the first data recording from 3 November 2023. The weather station records rainfall, temperature, humidity, wind speed and direction, atmospheric pressure and solar radiation. The total percentage of data captured for the reporting period was 96%, with the main issue being insufficient battery charge effecting overnight capture of data between 19 April 2024 and 10 June 2024.

The weather data at MRP Airstrip is summarised in the following sections.

4.3.1 Rainfall

From nine years of MRP Airstrip data which has rainfall records available for every month of the year (2010-2017 and 2024), the average annual total rainfall is 228 mm. The data recorded for other years (2018-2023) was limited with only 4 to 7 months captured, therefore these data have been excluded from the total and average rainfalls.

Total



448

The highest monthly total rainfall was 198 mm in March 2024 (Figure 4). The highest daily rainfall was on the 16 February 2011 in which 78.1 mm was recorded5. The year 2024 received the next four highest daily rainfall records (11/03/2024 - 77.2 mm, 9/03/2024 - 62.8 mm, 24/01/2024 - 54.8 mm and 25/01/2024 - 54.4 mm). The year 2024 was wetter than the nine year average, with having the highest annual total rainfall of 448 mm recorded, the second highest of 435 mm was in 2011. Comparison of the total monthly rainfall in 2024 with the nine year average is provided in Table 2.

On average Summer (December to February) is the wettest period with approximately 40% of the annual rainfall occurring, and secondly Autumn (March to May) with 28% of the annual rainfall.

Month	Rainfall Monthly Average 2010- 2017/2024 (9 years) (mm)	2024 Monthly Rainfall (mm)	
January	40.5	129.8	
February	37.0	0.0	
March	44.4	198.2	
April	8.8	4.6	
May	9.7	1.0	
June	18.2	35.2	
July	9.3	10.0	
August	10.5	1.6	
September	6.6	15.6	
October	9.9	9.0	
November	20.1	30.0	
December	13.0	13.0	

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Table 2: 2024 and Average Monthly Rainfall Comparison

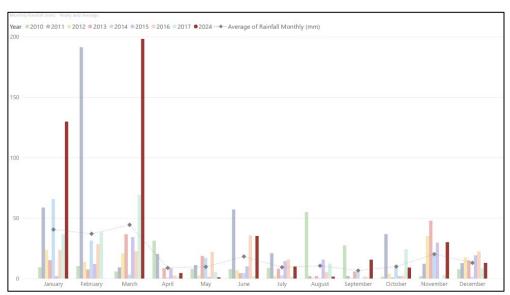


Figure 4: MRP Monthly Total and Monthly Average Rainfall

⁵ The highest daily rainfall of 78.1 mm on the 16 February 2011 is a higher reading than previously reported (i.e., 63.7 mm) due to the adjustment of the data to conform with the daily standard for recording the total daily rainfall at 9am.



4.3.2 Temperature and Humidity

Table 3 shows the average minimum and maximum daily temperatures for each season for the period 2010 to 2024, and the 2024 averages. The averages for the seasons shows that 2024 was mostly warmer compared to the 15 year average.

Figure 5 shows the average monthly minimum and maximum daily temperatures for the period 2010 to 2024 with comparison to 2024 monthly averages. The anomalies in the higher minimum temperature data in May 2024 that were caused by equipment failure, have been excluded from data presented in Table 3.

In summer the highest maximum temperature of 47.5°C was recorded in January 2024. Summers have an average minimum of 18°C and maximum of 33°C. In winter the temperatures range from an average minimum of 4.5°C and maximum of 19.3°C, with the coldest temperature recorded in July 2013 being -6.4°C.

Season		ximum Daily nture (°C)	Average Minimum Daily Temperature (°C)		
	2010-2024	2024	2010-2024	2024	
Summer	32.9	35.4	17.9	18.0	
Autumn	25.8	25.5	11.6	13.1	
Winter	19.3	21.1	4.5	7.2	
Spring	27.3	28.8	12.2	12.4	

Table 3: MRP Average Temperatures

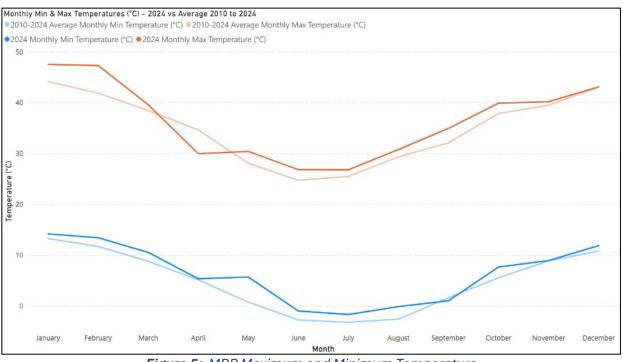


Figure 5: MRP Maximum and Minimum Temperature



Humidity is highest during Autumn and Winter averaging a maximum of 81% and 85% respectively. Spring and Summer average a maximum humidity of 67% and 70% respectively. 2024 was mostly typical of the longer-term averages other than Spring which had a higher humidity (Table 4).

Table 4: MRP Seasonal Average Minimum and Maximum Humidity

Sacan	Average Minimu	ım Humidity (%)	Humidity (%) Average Maximum H	
Season	2010-2024	2024	2010-2024	2024
Summer	28	24	70	71
Autumn	36	38	81	80
Winter	38	38	85	88
Spring	28	26	67	77

4.3.3 Wind Speed and Direction

2010 to 2024 data for wind direction and wind speeds with sensors at a 10 m height were used to develop wind roses for each season (Figure 6). This data shows:

- Summer is typically the windiest time of year, with mostly wind speeds between 3 to 9 km/hr and periods where wind speeds can get to >20 km/hr. The average wind speed is 5.9 km/hr and with calm conditions 2% of the time. The prevailing winds are predominately east-south-east to south-east. The 2024 summer was typical of the 15 year averaged seasonal conditions apart from a higher frequency of stronger winds (9-20 km/hr) with some gusts over 20 km/hr experienced.
- Autumn has mostly wind speeds between 1 to 6 km/hr and with lesser frequencies where wind speeds range up 12 km/hr and with occasional gusts up to 20 km/hr. The average wind speed is 3.7 km/hr and with calm conditions 17% of the time. The prevailing winds are predominately east to south-east. As with the 2024 summer, during the Autumn 2024 there was a higher frequency of stronger winds (9-20 km/hr) compared to the 15 year averaged seasonal conditions.
- Winter has mostly wind speeds between 1 to 6 km/hr and periods where wind speeds can get to 9 km/hr. The average wind speed is 3 km/hr and with calm conditions 20% of the time. The prevailing winds are predominately westerlies and to a lesser extent easterlies. The 2024 winter experienced lighter wind conditions (1-3 km/hr) and were more from the north-westerly directions which are not typical of the 15 year average.
- Spring has mostly wind speeds between 1 to 9 km/hr and periods where wind speeds can get to 20 km/hr. The average wind speed is 4 km/hr and with calm conditions 12% of the time. The prevailing winds are predominately east to south-easterly. The 2024 spring experienced more lighter wind conditions (1-3 km/hr) than the 15 year average.



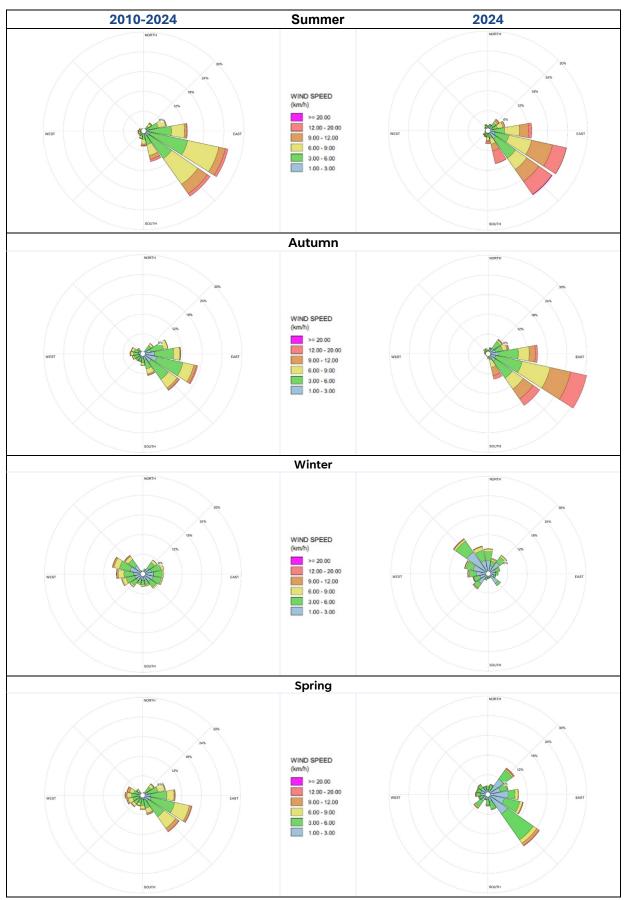


Figure 6: MRP Wind Direction and Speed



4.4 Air Quality

4.4.1 Objective and Management Targets

Air quality management is included in the Flora and Vegetation Monitoring and Management Plan (EMP-EHS-001) (FVMMP), with the objective being to minimise direct and indirect impacts of dust as far as practicable on all conservation significant flora species (CSFS) and vegetation communities E3 and S6. The management target is to minimise any additional dust levels above background levels within MRP, as a result of the implementation of the Project. The following tasks are implemented to minimise impact on air quality:

- Using, when required, dust suppression techniques on existing and constructed roads to control dust generation.
- Keeping opened or exposed cleared surfaces to a minimum through controls included in the GDAP system.
- Minimising dust generated by controlling vehicle speed limits and no unauthorised driving off existing roads/tracks.
- Suspending earthworks and mining activities that generate dust during periods of extreme winds.
- Rehabilitating disturbance areas as soon as possible.
- Environmental induction emphasising the importance of flora and vegetation.

4.4.2 Monitoring Requirements

Table 5 notes the status of compliance with the FVMMP requirements to achieve the management targets for the Project. The part of the FVMMP that contains reference to dust management and monitoring has been extracted for this Air Quality section and therefore will not be included in Section 4.7 Flora and Vegetation.

The Soil Monitoring and Management Plan (SMMP) (Management-based) (EMP-EHS-010) also includes requirements to allow the use of paleodrainage channel groundwater for dust suppression. These requirements are included in Section 4.6.2 (refer Table 10).

Table 5: Dust Management Actions and Monitoring Status

Management Action	Monitoring Requirement	Status*	Comments
Use dust suppression techniques on existing and constructed roads to control dust generation.	Annual assessment of dust monitoring results.	NR	No dust suppression was undertaken during the reporting period as the level of dust generated did not warrant the requirement for this activity. The dust levels in the reporting period and in all previous years, as measured by depositional dust gauges, were well below the guidance threshold of 4 g/m²/month (Section 4.4.4 and Figure 9).
Keep 'open' or exposed / cleared surfaces to a minimum.	Annual audit of 'open' or exposed or cleared surfaces recorded in GDAP system and	С	During the reporting period the Company's GIS continued to be improved (refer to Section 4.2.2). The GIS provides reconciled and updated information with high resolution drone



Management Action	Monitoring Requirement	Status*	Comments
	comparison with active operational areas.		photos and the GDAP disturbance and rehabilitated areas. This information is also used in the DEMIRS's AER and MRF and DWER's CER. The Project implementation status of operational areas is explained in Section 2.
Rehabilitate disturbance areas as soon as practicable after activities cease.	Annual reconciliation of 'open', 'closed, and operational areas.	С	During the reporting period the Company's GIS continued to be improved (refer to Section 4.2.2). The GIS provides reconciled and updated information with high resolution drone photos and the GDAP disturbance and rehabilitated areas. This information is also used in the DEMIRS's AER and MRF and DWER'S CER. The Project implementation status of operational areas is explained in Section 2.
Speed limits will be used to minimise dust from vehicles and no unauthorised driving off existing roads / tracks will be permitted. Speed limits will be initially set as follows: Site Access Road – 80 km/hr Plant, Village and Aerodrome – 60 km/hr Haul Roads and Site Tracks – 40 km/hr	Annual assessment of dust monitoring results. Any excessive dust deposition recorded that could not be explained by variations in background dust deposition rates as measured in g/m²/month would be investigated for the root cause.	С	Speed limits and restrictions on driving off- road are in-place as informed in the MRP Site Induction (MRO-WHS-PP-001), for example includes: Tropicana access road 80 km/hr PNC / Nippon Highway / Main access road 60 km/hr Haul roads and site tracks 40 km/hr Camp and laydown areas 20 km/hr. The Environment and Community Relations Induction – Air Quality section, for example includes: To minimise dust, abide by speed limits around site, or slow down further if you notice that you are generating excessive dust. Drive only on signposted established roads, you must have authorisation to use any other off-road track, exploration access / grid line. Assessment of the baseline dust depositional monitoring is provided in Sections 4.4.3 and 4.4.4. There was no excessive dust recorded.
Earthworks and mining activities that may generate dust will be suspended during periods of extreme winds.	Annual assessment of mine record books and/or shift records recording number of days mining suspended due to extreme winds.	С	The site record books or shift records do not show any mining activities (i.e. exploration) suspended due to extreme winds.
New site personnel will undertake an environmental induction,	Annual audits of training records.	С	Refer to Section 4.1 Environmental Induction. The Company's database induction records show that in the reporting



Management Action	Monitoring Requirement	Status*	Comments
emphasising importance of flora and vegetation at the MRP.			period all personnel (consisting of 31 employees and 75 contractors and visitors) completed the Environment and Community Relations Induction (MRO-ENV-PP-008) and its assessment.

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage.

4.4.3 Dust Deposition Monitoring

The MRP and surrounding area has naturally elevated background dust concentrations, which is caused by sources such as wind erosion and bush fires. Variations in dust concentrations occur as a result of higher wind speeds (refer Figure 6).

Depositional dust monitoring is undertaken across the MRP to assess the baseline and potential contribution of site operations to dust fallout in the surrounding areas.

The dust monitoring program and all equipment (Figure 7) is operated based on the following standards:

- AS/NZS 3580.10.1 (2003) Methods for sampling and analysis of ambient air –
 Determination of particulate matter Deposited matter Gravimetric method; and
- AS/NZS 3580.1.1 (2007) Methods for sampling and analysis of ambient air Guide to siting air monitoring equipment.



Figure 7: Depositional Dust Gauge

18 depositional dust monitors were located around site in 2018 and were monitored up until August 2023. The number of sites monitored was reduced to 11 (Figure 8) in 2024 to remove sites that will not be monitored long-term, due to them either being within future ground disturbance footprints, or their being sufficient nearby upstream and downstream monitoring points.

From August 2024 the dust deposition monitoring was brought further in-line with the AS/NZS 3580.10.1 (2003) by changing the sampling period from quarterly to monthly.



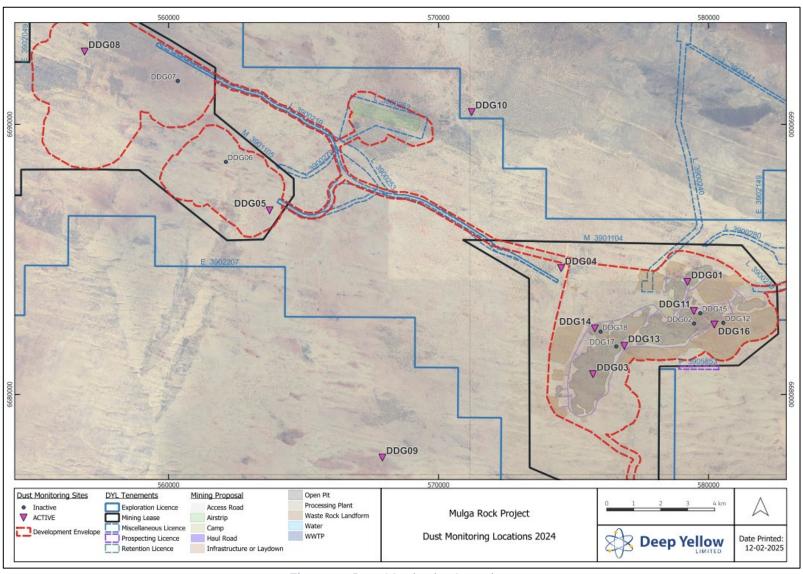


Figure 8: Dust Monitoring Locations

There are no specific state-wide criteria for dust deposition limits. The WA Environmental Protection Authority has applied the NSW Department of Environment and Conservation's dust deposition standard provided in the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW. The standard is a maximum total deposited dust level of $4 \, \text{g/m}^2/\text{month}$ (no more than $2 \, \text{g/m}^2/\text{month}$ above background) as a monthly average.

4.4.4 Monitoring Results

Total depositional dust results collected to date are presented in Figure 9. All 2024 results are below the guidance threshold of $4 \text{ g/m}^2/\text{month}$.

Note there is one previous anomaly of 10.49 g/m²/month at the background site (DDG10) in April 2023. Exclusion of the anomaly was made after receipt of advice from the analytical laboratory, ALS on the 6 July 2023 that the sample contained an abnormal quantity of sand most likely due to a sampling error.

The background sites had levels in 2024 ranging from:

- DDG09 0.24 to 1.99 g/m²/month, with an average for the year of 0.95 g/m²/month; and
- DDG10 0.08 to 2.74 g/m²/month, with an average for the year of 0.88 g/m²/month.

In 2024 all other site results ranged from 0.22 to 2.63 g/m²/month, and all had a monthly average that were less than the threshold of $2 \text{ g/m}^2/\text{month}$ above background (i.e. $3.99 - 4.74 \text{ g/m}^2/\text{month}$). Monthly average results ranged from 0.81 to 1.46 g/m²/month.



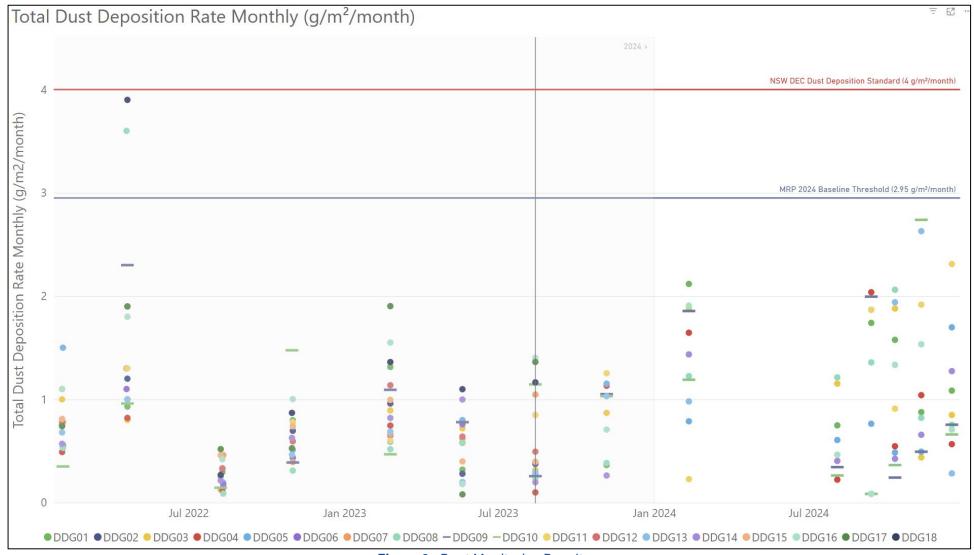


Figure 9: Dust Monitoring Results



4.5 Groundwater

Groundwater at the MRP is managed through the Groundwater Monitoring and Management Plan (EHS-EMP-004) (GMMP). The hydrographs for all areas show no discernible trends indicating a stable hydrogeological environment.

4.5.1 Objective and Management Targets

The objective of the GMMP is to minimise impacts to groundwater quality as far as is practicable. The GMMP key management targets to ensure that the environmental objective is met are to:

- restrict reinjection of surplus groundwater from dewatering operations to ≤1.5 GL/a;
- reinject surplus groundwater of similar or better quality than background groundwater quality in the reinjection borefield;
- restrict groundwater abstraction for dewatering to achieve dry mining conditions to
 ≤2.5 GL/a; and
- maintain groundwater quality at M39/1104 boundary within background concentrations.

4.5.2 Monitoring Requirements

Groundwater monitoring at MRP requires the measurement of total abstraction and reinjection volumes and the monitoring of reinjection water quality and groundwater quality at M39/1104 southern boundary. Table 6 shows the status of compliance with the GMMP required to achieve the management targets for the Project.

The GMMP requirements will be implemented on commencement of groundwater abstraction and reinjection. The current monitoring being undertaken is discussed in Section 4.5.3.

Table 6: Groundwater Management Actions and Monitoring Status

Management Action	Monitoring Requirement	Status*	Comments
Quarterly analysis of the monitoring of reinjection volumes to ensure the Management Target 1 will be met (no more than 1.5 GL/a of reinjection). Adjustment made to dewatering volumes and the use of surplus water for mining purposes if analysis suggests that Management Target 1 could be exceeded.	Reinjection bores will have flow meters located at the point of reinjection, recording both instantaneous and cumulative flows. A constant record of the data will be kept. Annual audit of reinjection volumes will be undertaken to ensure that metering is accurate.	NR	The GMMP requirements will be implemented on commencement of groundwater abstraction and reinjection. The current monitoring being undertaken (background monitoring) is discussed in Section 4.5.3.
Quarterly analysis of the monitoring of reinjection water quality to ensure that it is similar or better than background water quality. If water quality is too poor for reinjection it will be	Initial monitoring for metals will be undertaken when dewatering first commences and repeated at 3-monthly intervals over the two years. Analysis will take place at the Process Plant holding pond. Thereafter testing for metals will be undertaken annually. The metals tested for in solution will be Zinc, Nickel, Manganese, Copper and Cobalt.	NR	The GMMP requirements will be implemented on commencement of groundwater abstraction and reinjection. The current monitoring being undertaken (background



Management Action	Monitoring Requirement	Status*	Comments
redirected to other acceptable uses or diluted to acceptable levels or failing those it will be sent to tailings. In the final analysis if no immediate solution is available then reinjection will be suspended until the situation is rectified.	Reinjection water quality will be monitored along the chain from mine dewatering bores all the way to reinjection bores to ensure that it is similar to or better than background groundwater quality. The main place where quality assessment will take place will be at the Process Plant where a dam holding processing water will be located. Water quality (relevantly pH, TDS and Eh) will be continuously recorded using a multiparameter probe and a constant record of the data will be kept. In the event that pH and Eh monitoring detects acidity or oxidation levels outside the range of normal variability (>2 standard deviations from rolling three-month average) then water quality monitoring will include additional checks for metals. Metal ions in solution will be considered unusually high if recorded levels exceed the highest levels found in past sampling in the mine area: • Zinc – 12.9 mg/L • Nickel – 3.8 mg/L • Copper – 1.9 mg/L • Cobalt – 3.1 mg/L These limits will be reviewed once sufficient data has been collected and revised if necessary. An annual audit to ensure probe accuracy will be undertaken.		monitoring) is discussed in Section 4.5.3.
Quarterly analysis of the monitoring of dewatering volumes to ensure Management Target 3 will be met (groundwater abstraction for dewatering restricted to ≤2.5 GL/a). Adjustments made to advance dewatering volumes if developments suggest Management Target 3 will be exceeded.	Extraction bores will have flow meters located at the point of extraction, recording both instantaneous and cumulative flows. A constant record of the data will be kept. Annual audit of dewatering volumes will be undertaken to ensure that metering is accurate.	NR	The GMMP requirements will be implemented on commencement of groundwater abstraction and reinjection. The current monitoring being undertaken (background monitoring) is discussed in Section 4.5.3.
An investigation of the cause of the problem would be undertaken and appropriate measures implemented with poor quality water extracted and pumped back for disposal upstream (to allow carbonaceous material to sequester metals), diluted to acceptability or transferred to tailings facilities.	Monitoring will take place under TSF Monitoring and Management Plan. In order to ensure that groundwater flow, in the areas around where mining activity takes place, both during and after dewatering activities, behaves in a manner similar to that modelled, groundwater levels will be monitored to ensure that any acid mine drainage that might have been generated will flow towards the cone of depression created by the dewatering activity as expected. liant, CLD = Completed, NA = Not Audited, NC = Non-compliant.	NR	The GMMP requirements will be implemented on commencement of groundwater abstraction and reinjection. The current monitoring being undertaken (background monitoring) is discussed in Section 4.5.3.

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage

Mulga Rock Project

Reporting Period: 16 December 2023 to 15 December 2024



4.5.3 Current Monitoring Program

The current groundwater monitoring program in-place at the MRP reflects the status of the Project activities (refer to Section 2). The program comprises the continuation of baseline monitoring, with planned quarterly water level and water quality analysis to be undertaken at selected existing monitoring and production bores.

During the reporting period only one of the planned quarterly monitoring rounds at existing monitoring locations was completed (April 2024). The monitoring program was modified due to the execution of a comprehensive hydrogeological investigation (Section 2.6.1) that commenced in June 2024 and resulted in the drilling and construction of 35 new dedicated groundwater monitoring and production bores across the Ambassador and Princess Deposits. The drilling program was completed in August 2024.

Numerous water level measurements and groundwater samples were collected during the bore construction phase of the program. Following completion of the bore construction phase an aquifer testing program incorporating step and constant rate pumping tests, falling head tests and airlift recovery tests was undertaken during September to December 2024. These tests resulted in the collection of further static and dynamic water level data from all tested bores and the collection of additional groundwater samples that were submitted for analysis. All of the work completed under the hydrogeological investigation undertaken over the second half of 2024 is being compiled into a comprehensive report by groundwater consultant AQ2, and all relevant data has been uploaded to the MonitorPro environmental database.

The hydrogeological investigations referred above have significantly increased the capacity to monitor groundwater conditions in MRP East. A revised monitoring program incorporating suitable existing bores and the newly installed bores will be implemented from 2025.

During the aquifer testing program groundwater samples were collected daily and tested for radon using the RAD7 apparatus. The results were then compiled to assess radon variability over time and to compare against historical measurements.

In addition to GMMP requirements, a 5C groundwater licence issued under the *Rights in Water and Irrigation Act 1914* (WA) is in place that authorises the taking of water from two production bores at the MRP:

- Bore KB003 on tenement L39/242 that has fresher water and is used when required to supply exploration drill rigs; and
- Bore MRWB07 on tenement M39/1104, where there is also a lined dam to contain saline groundwater. This facility has been developed as a source of dust suppression water

Abstraction from both bores is approved under a licence to take water GWL203514(3), with an annual entitlement of 135,600 kL, of which during the last licencing period (1 November 2023 to 31 October 2024), 1,353 kL was abstracted. 6

⁶ Note: Correction has been made to the Water Online record for 2022/2023 year. On review of the abstraction records the 1,258 kL reported should have been 5,554 kL. DWER were advised of the required change on the 6/12/24.



4.5.3.1 Existing Monitoring Bores

Following the completion of the 2023 ground-truthing exercise to validate the status of some 198 locations tagged either as a groundwater production or water monitoring bore and captured in the MRP geological SQL database, approximately 94 bores located were assessed to be suitable for monitoring primarily for the measurement of groundwater levels. The majority of these bores were mineral exploration holes that had been cased with 40 mm PVC. A subset comprising approximately 60 of these monitoring bores was earmarked for inclusion into the current monitoring program for ongoing monitoring to further support the established baseline groundwater level dataset.

The locations of the 60 existing bores earmarked as suitable for inclusion for monitoring are shown in Figure 10.

Given the focus on the Ambassador and Princess Deposits over the reporting period there has been no monitoring of groundwater in the MRP West area (Emperor and Shogun Deposits) and limited monitoring in Kakarook North, Kakarook and the Reinjection Borefield areas.

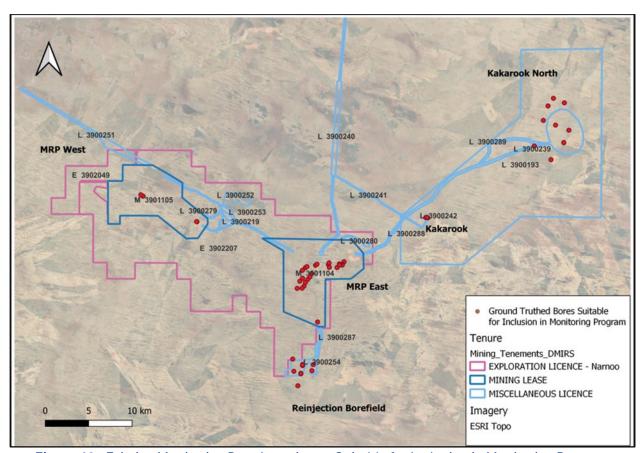


Figure 10: Existing Monitoring Bore Locations – Suitable for Inclusion in Monitoring Program

The location and names of existing bores that were ground-truthed in 2023 and deemed suitable for inclusion in the monitoring program for the MRP East project area (Ambassador Deposit) are shown in Figure 11.

During the reporting period 21 of the existing monitoring bores identified as suitable for inclusion in the monitoring program were improved by establishing a defined and surveyed measuring point



approximately 0.6 m above ground level (agl), with the casing fitted with a steel protective cap set into a concrete block (Figure 11).

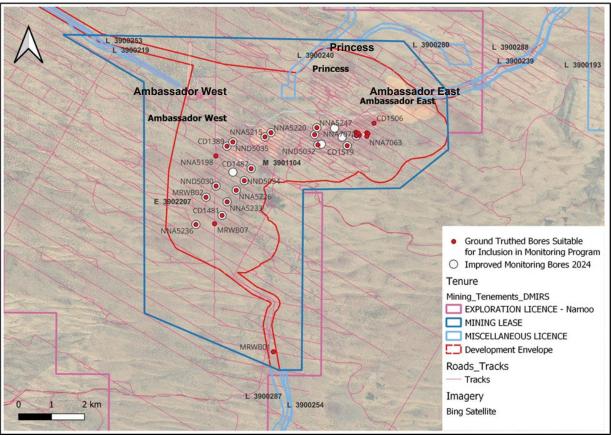


Figure 11: Existing Groundwater Monitoring Locations MRP East

Existing bores monitored during the current reporting period are detailed in Table 7. The production and monitoring bores installed during the current reporting period will be incorporated into the 2025 monitoring program.

Table 7: Existing Bores Monitored – 2024

	Location	Monitoring			
Bore Name		Water Level	Field Chem	Lab Chem	
CD1506+, CD1589+, MRWB01+, MRWB02+, NNA5198+, NNA5215*, NNA5220, NNA5247, NNA7045, NNA7046, NNA7063, NNA7071, NNA7072, NND5030, NND5032*+, NND5034+, NND5035*, NND5039*	MRP East – Ambassador Deposit – proposed mining area	Manual dip	pH, EC, T°C, ORP	Major cations/ anions ICPMS metals suite	
KB001+, KB003, NWB03+, NGW18, NGW49	Kakarook and Kakarook North Area – future water supply borefields	meter, + Dataloggers, * Well cap			
NWB01+, NWB02	Reinjection Borefield Area				



4.5.4 Monitoring Results

4.5.4.1 Groundwater Levels

The depth to water in monitoring bores at the MRP is generally measured using a conventional electronic dip meter. The resolution of any water table movement was enhanced by the deployment of ten dataloggers that require manual download in selected bores during the review period. The dataloggers were set to record one measurement per day.

EWS well caps were installed at four locations, NNA5215, NNA5032, NNA5035, NNA5039. The EWS well caps measure water levels at six hourly intervals and transmit the data daily via satellite to the host platform from where the data is uploaded to the environmental database.

Hydrographs as depth to water, as metres below top of casing (mbtoc) for production and monitoring bores in MRP East, Kakarook/Kakarook North and the Reinjection Borefield areas are presented in Figure 12 to Figure 14. The elevations of production and monitoring bore casings are required to be surveyed to allow relative water levels to be validated. Once this has been completed the hydrographs will be presented as depth to water mRL btoc. Water levels have been presented for each area for the current and previous monitoring periods.

The hydrographs for all areas show no discernible trends indicating a stable hydrogeological environment.

Water levels in the MRP East area are stable with variations limited to barometric influences. The stratigraphy of the MRP East deposit has a marked effect on the gradient of the water table as groundwater flows from north east to south west across Ambassador East to Ambassador West.

The most recent composite water table contour plot was compiled from data collected in 2017. A survey will be conducted early in 2025 of all the recent bore completions and all existing monitoring bores deemed to be suitable for inclusion in the monitoring program. An updated composite water table contour plot will be generated to confirm the historical record.

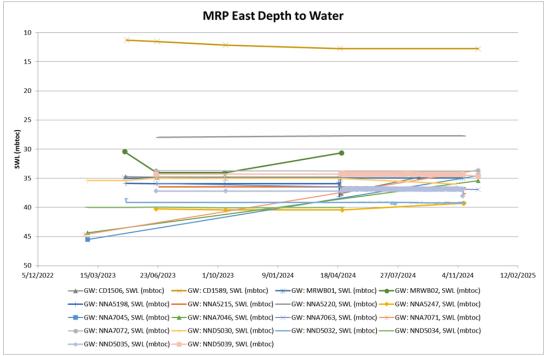


Figure 12: Depth to Water MRP East



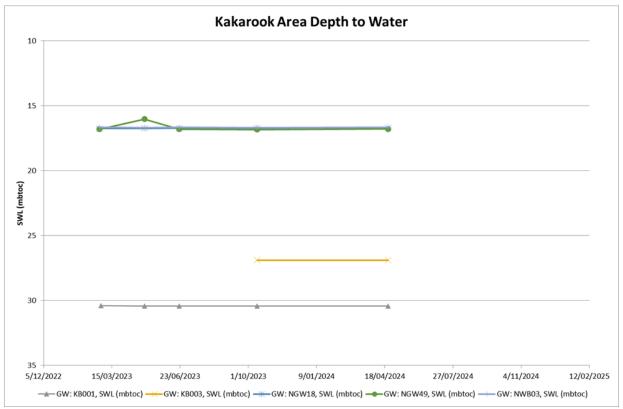


Figure 13: Depth to Water Kakarook Area

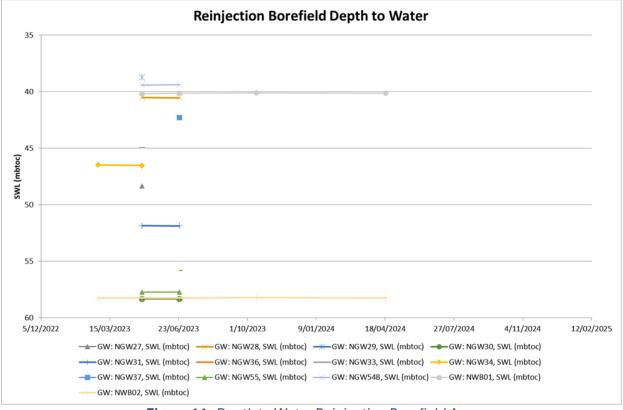


Figure 14: Depth to Water Reinjection Borefield Area



Groundwater flow across the Ambassador deposit is controlled by basement lithology. An elevated low permeability Permian "ridge" forms a barrier to groundwater flow between Ambassador East and West. This restricts groundwater flow east of this "ridge" resulting in the water table being constrained with little to no gradient from about 300 mRL at the eastern end of Ambassador East to 298 mRL at the western end of Ambassador East. Groundwater flow appears to be less constrained to the north of the paleochannel at the western end of Ambassador East where the low permeability Permian lithologies appear to have been eroded and a thicker sequence of Eocene sediments facilitates groundwater flow, demonstrated by a more gradual decline in groundwater elevations between Ambassador East and West.

Generally, groundwater levels east to west across the Permian "ridge" show a much steeper gradient ranging from 298 mRL to 293 mRL before groundwater flow resumes at a more gradual gradient decline to the south west along the paleochannel from an elevation of about 293 mRL to 289 mRL at the most southern end of Ambassador West. The elevation of groundwater levels for the MRP East area are shown in Figure 15.

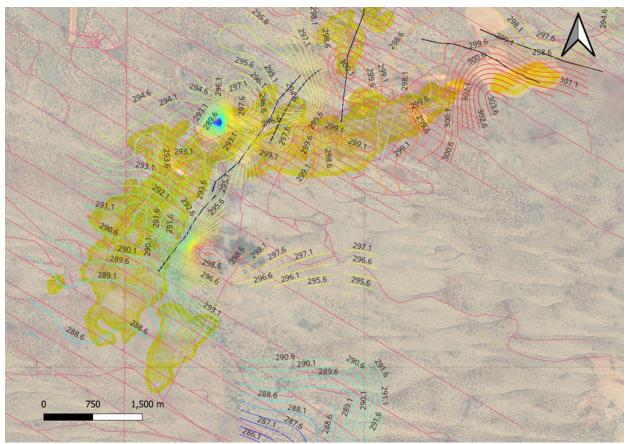


Figure 15: Groundwater Levels MRP East Area (composite data set Feb 2017)

4.5.4.2 Groundwater Chemistry

The baseline groundwater chemistry data set for the MRP East, MRP West and Reinjection Borefield was presented in the PER (Vimy, 2015). This data set was characterised by assessing 448 water samples collected from 247 drill holes across the MRP area from 1985 to 2015. Ongoing groundwater sampling from selected existing production and monitoring bores will be incorporated into the baseline data set to further validate pre-mining conditions.



The key parameters of pH and EC will be primarily used to assess potential changes in groundwater quality as a result of mining and processing operations to ensure that the management targets of the GMMP are achieved. The baseline pH of groundwater measured in existing bores over the current and previous monitoring periods at MRP East is shown in Figure 16.

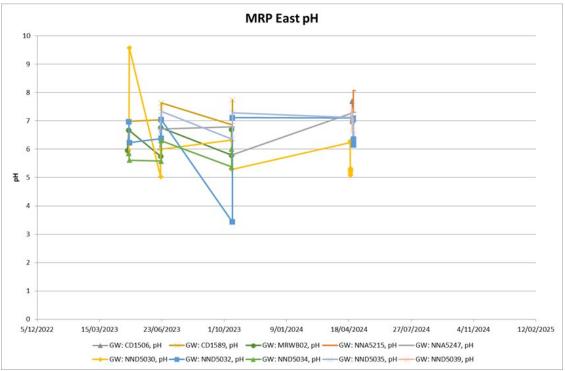


Figure 16: MRP East pH

The EC of groundwater at MRP East area is shown in Figure 17.

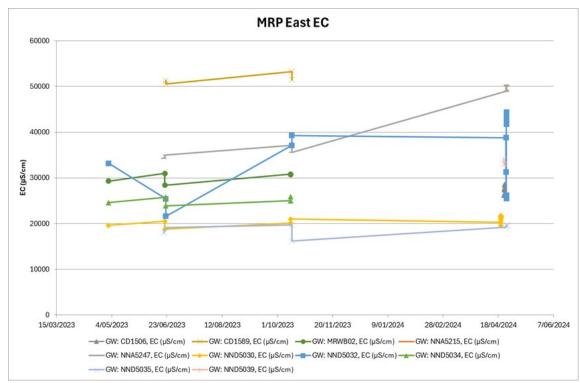


Figure 17: MRP East Electrical Conductivity



Dewatering will be required to facilitate mining of the MRP East orebody. Groundwater will be abstracted from the proposed Princess and Ambassador mining areas via bores and used for dust suppression with any surplus groundwater abstracted being disposed of in the Reinjection Borefield. Groundwater disposed of into the Reinjection Borefield is required to be of a similar or better quality than established baseline conditions.

The baseline pH of groundwater in the MRP East area generally ranges between pH~5 to pH~7.5. The pH of groundwater in the Reinjection Borefield area is generally in the range of pH~4 and pH~6. Groundwater salinity increases naturally in the direction of flow. The salinity of groundwater in the MRP East area measured as EC is in the range of 20,000 to $60,000\,\mu\text{S/cm}$. The salinity of the groundwater downgradient of the MR East area south of the Ambassador West deposit in the Reinjection Borefield is generally in the range of 50,000 to $90,000\,\mu\text{S/cm}$. Pre-mining baseline monitoring demonstrates that the primary groundwater quality parameters of pH and EC of dewatering abstraction is expected to be better than the groundwater in the receiving aquifer at the Reinjection Borefield.

The upper limit concentrations for key metals in the proposed East and West mining and Reinjection Borefield areas from historic monitoring over the period 2014 to 2018 that have been previously reported in the GMMP are shown in Table 8. The provenance of these data remains under review.

Table 8: Upper Limit Concentrations Dissolved Metals (2014 to 2018)

Metal	Concentration (mg/L)
Zinc	12.9
Nickel	3.8
Copper	1.9
Cobalt	3.1

These upper limits of baseline concentrations of metals in groundwater will be used to assess whether any changes in the reduction oxidising status of the local aquifer systems, due to mining operations results in an increase in these key metals in solution. These upper limits will be reviewed against ongoing and future monitoring data and if necessary, will be revised. The dissolved and total concentrations of zinc, nickel, copper and cobalt in the MRP East area and the Reinjection Borefield area for data that has been validated are presented in Figure 18 to Figure 21.



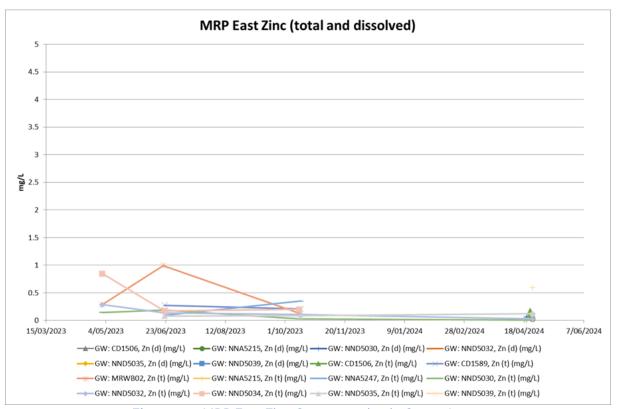


Figure 18: MRP East Zinc Concentration in Groundwater

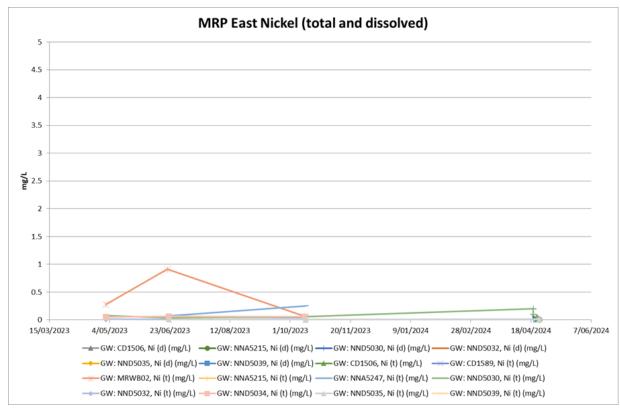


Figure 19: MRP East Nickel Concentration in Groundwater



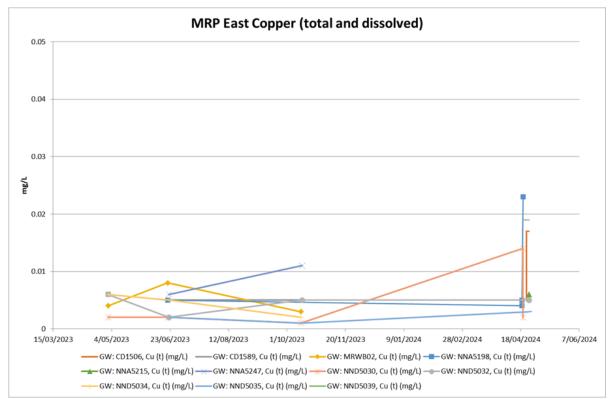


Figure 20: MRP East Copper Concentration in Groundwater

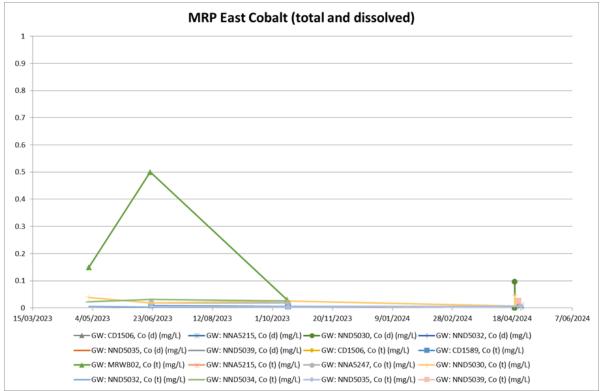


Figure 21: MRP East Cobalt Concentration in Groundwater

The total concentrations of zinc, nickel, copper and cobalt in groundwater from sampling undertaken in the MRP East area during the reporting period are presented in Table 9.



Table 9: MRP East Area Total Metals Concentrations Groundwater Sampling 2023 – 2024

Sample Point	Date	Zinc (total) (mg/L)	Nickel (total) (mg/L)	Copper (total) (mg/L)	Cobalt (total) (mg/L)
CD1506	23/4/2024	0.096/0.176	0.024/0.029	0.005/0.017	0.022/0.019
	1/05/2023	0.147	0.077	0.002	0.039
NND5030	21/06/2023	0.189	0.036	0.002	0.019
NNDSUSU	13/10/2023	0.029	0.054	<0.001	0.026
	20/4/2024	0.043/<0.005	0.206/0.006	0.014/0.002	0.046/0.007
	1/05/2023	0.287	0.011	0.006	<0.005
NND5032	22/06/2023	0.137	0.008	<0.002	<0.002
NND3032	14/10/2023	0.105	<0.005	<0.005	<0.005
	20/4/2024	0.117	<0.005	0.005	0.002
	22/06/2023	0.08	0.009	0.002	0.006
NND5035	14/10/2023	0.084	0.005	<0.001	0.002
	20/4/2024	0.125	0.003	0.003	0.007

The total and dissolved concentrations of zinc, nickel, copper and cobalt in groundwater sampled over the reporting period are considerably lower than the upper reported limits of dissolved concentrations of these metals over the historical monitoring period from 2014 to 2018. Continued sampling and assessment of total versus dissolved concentrations of these metals will be undertaken to further validate the baseline data set.

4.5.5 Revised Groundwater Monitoring Program

The completion of the 2024 hydrogeological investigation program referred to above necessitates a revision of the current groundwater monitoring program. The revised program will be implemented from 2025. The installation of dedicated groundwater monitoring bores and the validation of existing bores will result in the groundwater level monitoring network across the Ambassador and Princess Deposits being expanded to over 50 surveyed locations. Variation in pore pressure will be monitored via the two vibrating wire piezometers. Water levels will continue to be routinely measured in selected bores in the Kakarook North, Kakarook and Reinjection borefield areas. The frequency of measurement will be commensurate with the potential for groundwater perturbations.

The bore design and construction methodology adopted for the construction of the new bores in MRP East area allows for water levels to be measured and groundwater samples to be collected from specific stratigraphic units. Therefore, allowing the measurement of potential head differences between stratigraphic units and for the assessment of potential aquifer stratification to be determined.

A purpose built groundwater sampling pump mounted on a reel arrangement with a capacity to deliver up to 1 L/s from 60 m has been acquired. This will allow representative sampling to be readily achieved by pumping from the 100 mm nominal diameter PVC cased monitoring bores. The sampling pump flow rate will facilitate conventional purging of the boreholes within reasonable timeframes.



During the hydrogeological investigations of 2024 a program of field filtering of the groundwater samples was introduced to allow the determination of the concentration of dissolved constituents. Pairs of samples (filtered and unfiltered) were submitted for chemical analysis to allow any differences to be evaluated. Once sufficient samples representing both total and dissolved constituents have been analysed to determine whether a material difference exists between the two methodologies a decision will be made in regard to ongoing sample collection methodology.

Samples for radionuclide screening (Gross Alpha, Gross Beta) together with analysis for ²²⁶Ra and ²²⁸Ra were collected towards the end of the long-term pumping tests at three of the production bores. Ongoing radionuclide screening will be implemented from 2025.

One of three threshold monitoring bores and one of three trigger monitoring bores required to be established at the southern edge of the lease boundary (M39/1104) in accordance with the TSF Monitoring and Management Plan (EMP-EHS-008) were installed during the hydrogeological investigations in 2024. Appropriate instrumentation will be deployed in these bores to facilitate baseline data collection.

A revised groundwater monitoring program for the MRP to augment the existing baseline dataset will be implemented from Q1 2025.

4.6 Soils

4.6.1 Objective and Management Targets

Soil at MRP is managed under the following CEMPs:

- Soil Monitoring and Management Plan (SMMP) Outcome-based (EMP-EHS-004);
 and
- SMMP Management-based (EHS-EMP-010).

4.6.1.1 SMMP Outcome-based

The objective of the SMMP Outcome-based is to maintain the quality of land and soils so that the environmental values, both ecological and social are protected.

The key management target to ensure that the environmental objective is met is as follows:

 Using the determined trigger and threshold criteria, ensure soil quality is maintained within background concentrations established during baseline studies 10 m from areas where paleodrainage channel groundwater and/or dewater has been used for dust suppression in Sandhill Dunnart (SHD) habitat (i.e. E3 and S6 vegetation communities).

The trigger criteria are:

- Soil salinity (as measured by electrical conductivity (EC); EC1:5) in SHD habitat, in samples taken 5 m from areas where dust suppression activities occurred, is ≥ 60 mS/m.
- Acidity (pH) in SHD habitat, in samples taken 5 m from areas where dust suppression activities occurred ≥2 standard deviations above mean established during baseline studies. Data will be adjusted for skew and kurtosis or whatever transformation is required to create a standard normal distribution.



- Concentration of key metals (Zinc (Zn), Nickel (Ni), Copper (Cu), Cobalt (Co) and Uranium (U); mg/kg) in SHD habitat, in samples taken 5 m from areas where dust suppression activities occurred, exceed the following limits:
 - o Zn 160 mg/kg dry weight
 - o Ni 38 mg/kg dry weight
 - o Cu 70 mg/kg dry weight
 - o Co 13 mg/kg dry weight
 - \circ U 23 mg/kg dry weight.

The threshold criteria are:

- Soil salinity (as measured by EC; EC1:5) in SHD habitat, in samples taken 5 m from areas where dust suppression activities occurred, is ≥ 80 mS/m.
- Acidity (pH) in SHD habitat, in samples taken 10 m from areas where dust suppression activities occurred ≥2 standard deviations above the mean established during baseline studies.
- Concentration of key metals Zn, Ni, Cu, Co and U in SHD habitat, in samples taken 10 m from areas where dust suppression activities occurred, exceed the following limits:
 - o Zn 160 mg/kg dry weight
 - o Ni 38 mg/kg dry weight
 - o Cu 70 mg/kg dry weight
 - o Co 13 mg/kg dry weight
 - U 23 mg/kg dry weight.

4.6.1.2 SMMP Management-based

The objective of the SMMP Management-based is to maintain the quality of land and soils (terrestrial environmental quality) so that environmental values are protected, by minimising impacts on soil quality as far as practicable resulting from lignite oxidation within stockpiles and the use of dewater for dust suppression.

The key management targets to ensure that the environmental objective is met are as follows:

- Sulphidic (carbonaceous) material directly disturbed by mining is identified and appropriately managed to minimise impacts on soil quality.
- Runoff from above ground potential acid forming storage areas is controlled.
- Sulphide oxidation and release of acid and metalliferous drainage from permanent post-mine landforms is minimised.
- Soil impacted by acid and metalliferous drainage is appropriately identified and managed to prevent further impact on soil quality.
- Handling or utilisation of sulphidic (carbonaceous) material is done appropriately.



 Paleodrainage channel groundwater used in dust suppression has minimal impacts on soil quality.

4.6.2 Monitoring Requirements

4.6.2.1 SMMP Outcome-based

Monitoring in the SMMP Outcome-based requires the measurement of soil salinity, concentration of key metals and acidity within SHD E3 and S6 vegetation communities. Table 10 shows the status of compliance with the SMMP Outcome-based required for each performance indicator.

Table 10: Soil Outcome-based Monitoring Status

Monitoring Requirement	Status*	Comments
Initial surface soil sampling (0 – 10 cm depth) of EC, pH and metals within E3 and S6 vegetation communities in close proximity to where infrastructure (roads) will be built just prior to their construction.	C	Monitoring was undertaken at 20 monitoring points (SS01-SS20) in 2022. After a review in 2023 of the 20 soil monitoring points it was determined that the majority of these were not suitable as long-term sites, as they were not within 5 m of main access roads, which are most likely to require dust suppression using saline water during operations. Ten new sites (MRP-SS21 to MRP-SS30) were established in 2024 by Mattiske Consulting Pty Ltd (Mattiske, 2024a) and one pre-existing site (MRP-SS07) was retained. All 11 sites are within either E3 and S6 vegetation communities and will be used for soil and vegetation health monitoring (Figure 22). Nine more monitoring sites will be established at a later date in areas where the MRP infrastructure footprint is still to be established or likely to change (i.e., haul roads, processing areas, etc.). Baseline soil monitoring was undertaken at the 11 sites (Figure 22: MRP-SS07, MRP-SS21 to MRP-SS30) in December 2024. Baseline vegetation health monitoring will be planned during a typical year of weather conditions (i.e., 2024 was not a typical year based on the site's weather data averages).
Conducting biannual (6 monthly) soil sampling (0 – 10 cm depth) for salinity (as measured by EC; EC1:5) at 5 m from where dust suppression activities have taken place in SHD habitat. Monitoring to also be conducted at 10 m if the trigger is exceeded, and monitoring expanded to include pH and metals.	NR	Due to the status of the Project (refer to Section 2), there has been no dust suppression activities required during the reporting period using paleodrainage channel groundwater and/or dewater.



Monitoring Requirement	Status*	Comments
Conducting biennial (every 2 years) soil sampling for pH levels and metal concentration of Zn, Ni, Cu, Co and U (or earlier if EC sampling indicates that there is a potential problem). Frequency of acidity and metal sampling reviewed on receiving results.	NR	Due to the status of the Project (refer to Section 2), there has been no dust suppression activities required during the reporting period using paleodrainage channel groundwater and/or dewater.
		Baseline monitoring was undertaken at the 11 sites (Figure 22: MRP-SS07, MRP-SS21 to MRP-SS30) in December 2024.

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage



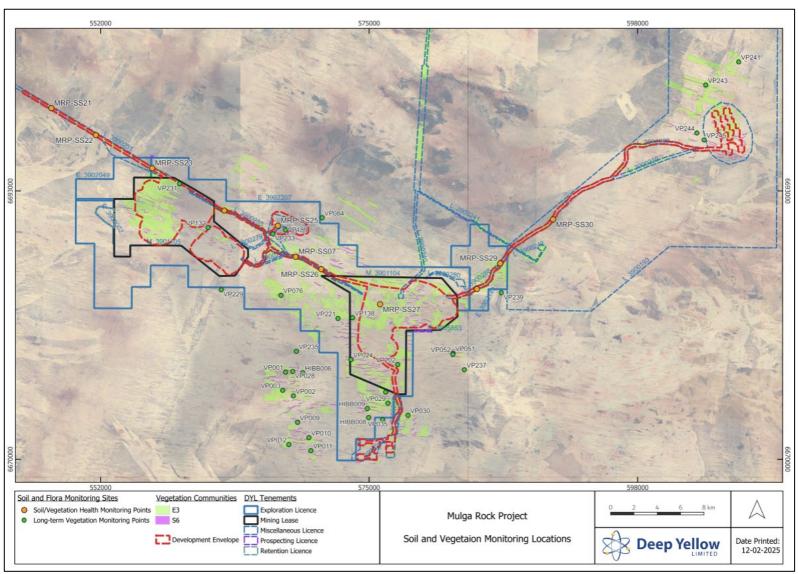


Figure 22: Soil and Vegetation Sampling Locations



4.6.2.2 SMMP Management-based

Due to the status of the Project activities, where there is no disturbance of sulphidic (carbonaceous) material from mining, no use of paleodrainage channel groundwater and/or dewater for dust suppression or establishment of permanent landforms, some of the monitoring requirements for the SMMP Management-based are currently not required. The status of compliance with the SMMP Management-based measures is shown in Table 11.

Table 11: Soil Management-based Monitoring Status

Management Action	Monitoring Requirement	Status*	Comments					
All sulphidic (carbonaceous) material to be directly disturbed by mining is identified and appropriately managed to minimise impacts on soil quality								
Conduct geochemical characterisation, as required, to confirm presence/absence of potential acid forming (PAF) materials.	Each time grade control drilling activity is undertaken the samples directly above the ore zone will be subject to a visual inspection and a comparison with the results of previous testing undertaken in the same area. If that visual inspection suggests that there is a risk of PAF materials being present, or the comparison with proximate samples, then geochemical testing will take place to determine the amount that is present. The geochemical determination will establish definitively whether PAF materials are present. Where significant PAF material is placed in above ground location (with an Overburden Landform or in a Temporary Stockpile) a nested piezometer will be installed in an appropriate location to check whether there has been any liquid draining from the area. If readings suggest that drainage has occurred samples of the liquor will be taken to check for AMD. There will be an annual audit of geochemical characterisation results to ensure that if PAF materials have been detected they were subsequently treated appropriately.	NR	Due to the current status of the Project (refer to Section 2), there is no available material and therefore no requirement to undertake geochemical characterisation for presence of PAF material.					
Record location of all stored or stockpiled PAF material.	Once it is established that PAF materials are present in an area proposed for mining (as a consequence of the geochemical testing), the GDAP system will then be used to store the estimated location of the PAF material and to keep track of its subsequent movements. This is a continuous and ongoing monitoring process.	NR	The GDAP Form (MRO-ENV-FM-007) has questions on PAF material: • If ground is excavated/mined, will it contain any PAF material? (If yes, the GDAP must be used to record location of all stored or stockpiled PAF material, and all future movements until final encapsulation).					



Management Action	Monitoring Requirement	Status*	Comments
	There will be an annual audit of the effectiveness of the use of the GDAP system to track and monitor PAF material.		Due to the current status of the Project (refer to Section 2), there has been no requirement to record location of stored or stockpiled PAF material.
Control runoff from abo	ve ground PAF storage areas		
Implement and maintain drainage control structures to minimise runoff from stored PAF materials interacting with the surrounding environment.	Areas where PAF materials are stored will be visually inspected on a regular basis as part of routine maintenance and inspected after any significant rainfall events. This will include inspection of nested piezometers designed to detect drainage after rainfall events. Annual audit of drainage control works undertaken in PAF storage areas and environmental incident reports of any overflowing of these drainage controls.	NR	The GDAP Form (MRO-ENV-FM-007) has questions on PAF material drainage control: • Are drainage control structures required around PAF material to minimise runoff from interacting with surrounding environment? Due to the current status of the Project (refer to Section 2), there has been no requirement for the storage of PAF materials, therefore no requirement to inspect PAF storage areas or drainage control.
	ation and release of acid and metalliferous	drainage (AMD) from permanent post-mine
landforms			
Isolate all sulphidic material stored within permanent post-mine landforms.	Sulphidic material stored within permanent post-mine landforms will be tracked by the GDAP system and therefore monitoring is a continuous process that starts when the PAF material is identified and continues until it has been safely encapsulated. Nested piezometers will be used to check that significant PAF material located in Overburden Landforms are isolated and not generating AMD seepage. Annual review of cover design modelling and annual audit of as-constructed cover systems to ensure they are built to the required specifications.	NR	The GDAP Form (MRO-ENV-FM-007) has questions on PAF material: • If ground is excavated/mined, will it contain any PAF material? (If yes the GDAP must be used to record location of all stored or stockpiled PAF material, and all future movements until final encapsulation). Due to the current status of the Project (refer to Section 2), there has been no requirement for the construction of permanent landforms.
All soil impacted by AM	D is appropriately identified and managed	to prevent f	urther impact on soil quality
Conduct soil (geochemical) investigations following removal of PAF materials stored on the land surface.	Occurs only when removal of PAF materials has occurred (which will have been monitored by the GDAP system). If PAF material are stored at surface for a period longer than two years in a location where AMD seepage could adversely impact soil quality, nested piezometers will be installed to ensure that there has been no AMD. Annual audit of soil investigation reports to ensure appropriate identification and delineation of AMD impacted soil.	NR	Due to the current status of the Project (refer to Section 2), there has been no requirement to conduct soi quality tests from removal of stored PAF material.



Management Action	Monitoring Requirement	Status*	Comments
All AMD impacted soil that poses a risk to the surrounding environment will either be remediated or excavated and appropriately disposed of.	Occurs when it has been identified by geochemical testing that there is AMD impacted soil. A risk analysis will be undertaken to establish whether this soil can be successfully remediated and if it can't whether it represents a risk to vegetation that warrants excavation and disposal elsewhere. Annual audit of earthmoving records identifying the handling and utilisation of all AMD impacted soil materials.	NR	Due to the current status of the Project (refer to Section 2), there has been no requirement to undertake investigations or remediation of AMD impacted soils.
No inappropriate handlin	ng or utilisation of sulphidic (lignite) materi	al	
New site personnel will undertake an environmental induction, emphasising the environmental qualities of the MRP area.	New site personnel register participation in environmental inductions. Annual audits of induction records.	C	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the environmental qualities of the MRP area, and in the "Land Management Slides" the GDAP process for tracking PAF material to its final destination. The GDAP Form (MRO-ENV-FM-007) has questions on PAF material: If ground is excavated/mined, will it contain any PAF material? (If yes, the GDAP must be used to record location of all stored or stockpiled PAF material, and all future movements until final encapsulation). Are drainage control structures required around PAF material to minimise runoff from interacting with surrounding environment?
Personnel involved in the handling and utilisation of sulphidic (carbonaceous) material will be trained so that they understand the potential risks if this material is inappropriately managed.	Personnel to be involved in the handling and utilisation of sulphidic materials register participation in the appropriate training. Annual audits of the personnel engaged in the handling and utilisation of sulphidic materials and of the associated training records.	NR	Due to the current status of the Project (refer to Section 2), there has been no requirement to train personnel on the handling and utilisation of sulphidic (carbonaceous) material.
All lignitic (carbonaceous) material will be tracked under the GDAP system when it is sent anywhere other than directly for further	The GDAP system operates continuously recording the presence of PAF materials and the location of where it is transferred to.	NR	 The GDAP Form (MRO-ENV-FM-007) has questions on PAF material: If ground is excavated/mined, will it contain any PAF material? (If yes, the GDAP must be used to record location of all stored or stockpiled PAF material, and all future



processing (i.e. anywhere other than the run-of-mine (ROM) pad at the Processing Plant). It will be monitored (which includes the length of time located in a particular location until it is sent for processing.	Monitoring Requirement An annual audit will be undertaken to ensure PAF materials identified have been suitably tracked and dealt with.	Status*	movements until final encapsulation). Due to the current status of the Project (refer to Section 2), there has been no requirement to track this material using the GDAP system.
	soil quality from paleodrainage channel g		
Dust suppression with paleodrainage channel groundwater will only occur in operational/ infrastructure areas after topsoil has been removed.	GDAP system used to authorise where dust suppression activities are allowed to occur. GDAP system will not authorise dust suppression activities in areas where topsoil has not first been removed and recorded as having been under the GDAP system. Annual audit of GDAP records to ensure compliance.	C	No dust suppression activities using groundwater were undertaken during the reporting period. Three GDAPs were submitted and authorised in the reporting period: • 20/02/2024 – Construction of a Sample Disposal Pit (SDP) within an area previously cleared for exploration/infill drilling (Tim's Square). The SDP is used for the disposal of potentially radioactive and other geological samples. The SDP is within the proposed open pit area, materials will be excavated and relocated during operations. • 6/06/2024 – Hydrogeological drilling investigation of Ambassador Deposit. • 23/09/24 – 20 diamond drill holes for bulk sampling; The GDAP Form (MRO-ENV-FM-007) has questions on topsoil removal and dust suppression: • Is the GDAP for dust suppression activities using paleodrainage channel (saline) groundwater or will include this activity? • Has/will all topsoil be removed prior to dust suppression activities using paleodrainage channel groundwater? No dust suppression was required as an activity within the three approved GDAPs.
Saline water runoff from	Areas where dust suppression activity	С	Three GDAPs were submitted and
dust suppression activities will be contained.	has taken place will be subject to routine visual inspections (as part of maintenance activities) and will be inspected after significant rainfall events		authorised in the reporting period. No dust suppression activities were undertaken during the reporting



Management Action	Monitoring Requirement	Status*	Comments
	that may have caused erosion of containment. Annual audit of GDAP records which require dust suppression activities using paleodrainage channel groundwater, including are the necessary controls in place, to be authorised.		period, therefore no inspections of areas were required.
Engineering controls (e.g. bunding or trenching) will be used around paleodrainage channel groundwater sources to minimise the impact from spills.	The engineering controls will be subjected to regular visual inspections (as part of routine maintenance) and will be inspected after significant rainfall events that may have adversely impacted them. Annual audit of drainage control structures around paleodrainage channel groundwater sources to ensure they are effective and maintained.	С	There is no paleodrainage channel groundwater extracted from Kakarook North borefield. Bore MRWB07 to the south of MRP East, extracts paleodrainage channel groundwater which is stored in a HDPE lined pond (refer to Figure 23). The facility is visually inspected, including the use of the Workplace Inspection Checklist Mining (MRO-WHS-CH-012). The Company's database has 24 inspection records uploaded.
All overspray reports and spills to be reported as an environmental incident.	Annual audit of environmental incident records.	С	No dust suppression activities using paleodrainage channel groundwater were undertaken during the reporting period. There were no incidents of overspray or spills from dust suppression activities.
New site personnel will undertake an environmental induction, emphasising the environmental qualities of the MRP area.	New site personnel register participation in environmental inductions. Annual audits of induction records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the environmental qualities of the MRP area.
Personnel involved in dust suppression activities will be trained so that they understand the potential risks to soil quality.	Personnel to be involved in dust suppression activities register participation in the appropriate training. Annual audits of training records.	NR	No dust suppression activities occurred during the reporting period, therefore there was no requirement for training of personnel. The GDAP Form (MRO-ENV-FM-007) includes a question on the training requirement: • Have personnel who will operate dust suppression equipment undertaken training in environmental sensitivities & safe application of saline water?
Only personnel who have undertaken environmental training will be able to operate dust suppression	Annual audits of training records and operator logbooks.	NR	No dust suppression activities occurred during the reporting period, therefore there was no requirement for training of personnel.



Management Action	Monitoring Requirement	Status*	Comments
equipment (e.g. water cart).			
Ensure all equipment used in dust suppression activities are fit-for-purpose to minimise impacts on soil quality.	Annual audit of mine equipment logbooks to establish correct machinery was used for dust suppression.	NR	No dust suppression activities occurred during the reporting period, therefore there was no requirement to assess equipment. The GDAP Form (MRO-ENV-FM-007) includes a question on the training requirement: Is all dust suppression equipment fit-for-purpose to minimise impacts on soil quality?
			, ,

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage

4.6.3 Current Monitoring Program

Based on the current status of Project activities the main soil monitoring programs include inspections of paleodrainage channel groundwater extraction facilities, to ensure the integrity of engineered controls, and soil analyses.

4.6.4 Monitoring Results

4.6.4.1 Paleodrainage Channel Groundwater Extraction Facilities

There is currently no paleodrainage channel groundwater extracted from Kakarook North borefield to the northeast of MRP East (refer to Figure 2).

Bore MRWB07, south of MRP East extracts paleodrainage channel groundwater and is stored in a HDPE lined pond (Figure 23). The pond is visually inspected on a regular basis to ensure the water is being effectively contained, even after significant rainfall events. Inspections are also completed using the Workplace Inspection Checklist Mining (MRO-WHS-CH-012), which includes a section 'Water Bores & Turkey Nest Dam'. Twenty four inspections were conducted during the reporting period with on some occasions observations related to increasing the water level of the turkey nest to maintain integrity of HDPE liner.





Figure 23: Bore MRWB07 Turkey Nest Facility

4.6.4.2 Soil Monitoring

Analysis of the soil quality has been undertaken as required in the SMMP Observation-based.

Soil sampling commenced in February 2022 and was also undertaken in June and November 2022. The surface soil sampling (0 – 10 cm depth) in 2022 was for analysis of EC, pH and metals at 20 locations principally within or nearby to E3 and S6 vegetation communities.

After a review in 2023 of the 20 soil monitoring points it was determined that the majority of these were not suitable as long-term sites, as they were not within 5 m of main access roads, which are most likely to require dust suppression using saline water during operations. Ten new sites (MRP-SS21 to MRP-SS30) were established in 2024 by Mattiske Consulting Pty Ltd (Mattiske, 2024a) and one pre-existing site (MRP-SS07) was retained (Figure 22). All 11 sites are within either E3 and S6 vegetation communities and will be used for soil and vegetation health monitoring.

Nine more monitoring sites will be established at a later date in areas where the MRP infrastructure footprint is still to be established or likely to change (i.e., haul roads, processing areas, etc.).

Due to the status of the Project, there has been no water sprayed for dust suppression during the reporting period from either the paleodrainage channel groundwater and/or dewater, therefore the requirement to undertake regular soil and vegetation health monitoring is currently not required.

Baseline surface soil sampling (0 – 10 cm depth) was undertaken at the 11 sites (MRP-SS07, MRP-SS21 to MRP-SS30) on the 15 December 2024. The first 10 cm of soil was sampled at a 5 m and 10 m distance from the road edge and analysed for the following parameters:

- pH
- EC using w/v method; EC_{1:5}
- Metals (mg/kg): Zn, Ni, Cu, Co, U



The results are presented in Table 12. Further baseline soil sampling will be undertaken to provide a larger dataset.

Table 12: Baseline Soil Analysis Results (MRP-SS07 and MRP-SS21 to MRP-SS30)

			Distance			Par	ameter			
Site	Site Vegetation Community	Soil Type	from Road Edge (m)	pH (1:5)	EC (1:5) (mS/m)	Co (mg/kg)	Cu (mg/kg)	Ni (mg/kg)	U (mg/kg)	Zn (mg/kg)
MRP-	E3	SMU2	5	6.6	0.9	1.2	2.5	2.7	0.1	2.0
SS07	20	01102	10	5.6	0.4	0.8	1.9	2.0	<0.1	1.6
MRP-	E3	SMU2	5	5.9	0.9	1.3	3.6	3.3	0.2	2.0
SS21	20	01102	10	6.2	0.6	1.4	3.5	3.4	0.2	2.3
MRP-	E3	SMU2	5	6.0	0.5	1.0	2.0	2.4	<0.1	2.2
SS22		01102	10	6.4	0.6	1.1	2.3	2.6	<0.1	2.7
MRP-	S6	SMU1	5	6.1	0.5	0.5	0.8	1.5	<0.1	1.1
SS23	00	01101	10	5.9	0.2	0.4	0.6	1.2	<0.1	1.2
MRP-	E3	SMU2	5	5.9	0.3	0.9	2.2	2.4	<0.1	1.8
SS24	20	01102	10	6.1	0.6	1.1	2.6	2.8	<0.1	2.5
MRP-	S6	SMU1	5	6.2	0.8	0.5	1.2	1.7	<0.1	1.8
SS25	30	31101	10	6.0	0.3	0.6	1.0	1.6	<0.1	2.6
MRP-	E3	SMU2	5	6.9	1.3	0.9	2.1	2.4	<0.1	1.6
SS26	20	01102	10	6.8	5.6	1.0	2.0	2.3	0.1	2.0
MRP-	E3	SMU2	5	6.8	1.4	0.7	1.7	2.1	<0.1	2.1
SS27	Lo	01102	10	6.8	0.5	0.7	1.5	2.0	<0.1	1.7
MRP-	E3	SMU2	5	6.2	1.0	0.6	1.2	1.8	<0.1	1.4
SS28	20	01102	10	6.1	1.1	0.5	1.1	1.7	<0.1	1.9
MRP-	E3	SMU2	5	6.1	0.5	0.9	1.7	2.4	<0.1	1.9
SS29	Lo	31102	10	6.2	0.4	0.8	1.6	2.1	<0.1	1.9
MRP-	E3	SMU2	5	6.5	1.1	1.1	2.1	3.4	0.1	2.8
SS30	20	01102	10	5.9	0.3	1.2	2.4	3.1	0.2	2.2
			Min.	5.6	0.2	0.4	0.6	1.2	<0.1	1.1
			Max.	6.9	5.6	1.4	3.6	3.4	0.2	2.8
			Mean	6.2	0.9	0.9	1.9	2.3	0.2	2.0
		Trigger	5	pH ≥2 standard deviations	≥ 60 at 5 m	13	70	38	23	160
		Threshold	10	above mean	≥ 80 at 5 m	13	70	38	23	160

Note:

- SMU1 Deep dunal sands
- SMU2 Sandy duplex soils

In summary the results show the soil baseline as currently:

- EC with a range from 0.2 5.6 mS/m, which is well below the trigger of ≥ 60 mS/m and threshold of ≥ 80 mS/m.
- pH with a range from 5.6 to 6.9, and a mean of 6.2. Further baseline soil sampling will be undertaken to provide a larger dataset for averaging pH. The data is currently skewed to lower (more acidic) pH levels. The impact of the current skew in the data is the result obtained at SS26 (6.9), is as a baseline result at one decimal point non-



compliant of two standard deviations above the mean. When the standard deviation rule is applied, the pH compliance level is currently calculated at 6.93.

- Cobalt with a range from 0.4 1.4 mg/kg dry weight, is well below the trigger and threshold of 13 mg/kg dry weight.
- Copper with a range from 0.6 3.6 mg/kg dry weight, is well below the trigger and threshold of 70 mg/kg dry weight.
- Nickel with a range from 1.2 3.4 mg/kg dry weight, is well below the trigger and threshold of 38 mg/kg dry weight.
- Uranium with a range from <0.1 0.2 mg/kg dry weight, is well below the trigger and threshold of 23 mg/kg dry weight.
- Zinc with a range from 1.1 2.8 mg/kg dry weight, is well below the trigger and threshold of 160 mg/kg dry weight.

4.7 Flora And Vegetation

The potential impacts on flora and vegetation are managed through the Flora and Vegetation Monitoring and Management Plan (EMP-EHS-001) (FVMMP).

4.7.1 Objective and Management Targets

The objective of the FVMMP is to maintain representation, diversity, viability and ecological function at the species, population and community level, by minimising direct and indirect impacts as far as practicable on all conservation significant flora species (CSFS) and vegetation communities E3 and S6.

The key management targets to ensure that the environmental objective is met are to:

- ensure that there is no unauthorised clearing or disturbance of flora and vegetation;
- minimise dust levels above the determined background within the Development Envelope as a result of the implementation of the Project;
- minimise impacts from saline water;
- not increase the number of weeds above baseline levels in Development Envelope as a result of the implementation of the Project; and
- not change the frequency or severity of bushfires in the MRP Development Envelope.

4.7.2 Monitoring Requirements

Table 13 shows the status of compliance with the FVMMP requirements to achieve the management targets for the Project.



 Table 13: Flora and Vegetation Management Actions and Monitoring Status

Management Action	anagement Action Monitoring Requirement S		Comments
Clearing/Disturbance			
No clearing outside of the Approved Development Envelope.	Annual audit of cleared/disturbed areas recorded in the GDAP system against approved Development Envelope boundary.	С	During the reporting period the Company's GIS continued to be improved (refer to Section 4.2.2). The GIS provides reconciled and updated information with high resolution drone photos and the GDAP disturbance areas. This information is used in the DEMIRS's AER and MRF, and DWER's CER. There was no GDAP approved or any clearing/disturbance outside of the approved Development Envelope boundary.
No unauthorised clearing outside of the approved Disturbance Footprint and checks for vegetation health (regarded as a symptom of disturbance) in soil monitoring locations.	Annual audit of cleared/ disturbed areas in the GDAP system against approved Disturbance Footprint area. The annual audit will include drone surveys and on the ground checks to ensure any disturbance aligns with what was authorised through the GDAP process. On the ground checks will include vegetation monitoring around soil monitoring locations which will be undertaken at the same time as the soil checks, i.e. every six months or more frequently if the soil monitoring sampling review indicates results that warrant more frequent sampling. Vegetation health will be recorded on a ranking scale, documented with photographic evidence and checked against prior ranking (and photographic evidence) to determine whether there has been any deterioration in vegetation health. This ranking involves observing the general health of the plants by vegetation types (if more than one type present and story (overstorey and understory) if different layers are present) looking for signs of stressed plants or species – such as atypical leaf colouration, leaf death, limb death and whole plant death and then rating (by type and layer) according to the following ranking: 0 = healthy and no signs of stress;	C	The Company's GIS provides reconciled and updated information with high resolution drone photos and comparison between the GDAP approval and actual disturbance footprint area can be made (refer to Section 4.7.4). Drone and ground surveys are done as required. This information is used in the DEMIRS's AER and MRF, and DWER's CER. No dust suppression activities were undertaken during the reporting period. Ten topsoil/vegetation health monitoring sites (MRP-SS21 to MRP-SS30) were established in 2024 by Mattiske Consulting Pty Ltd (Mattiske, 2024a) and one preexisting site (MRP-SS07) was retained (Figure 22). All 11 sites are within either E3 and S6 vegetation communities and will be used for soil and vegetation health monitoring. Nine more monitoring sites will be established at a later date in areas where the MRP infrastructure footprint is still to be established or likely to change (i.e., haul roads, processing areas, etc.). Baseline vegetation health monitoring a typical year of weather conditions (i.e., 2024 was not a typical year



Management Action	Monitoring Requirement	Status*	Comments
	1 = some early signs of stress, a few individuals, likely one species; 2 = signs of stress in several individuals, one or more species; 3 = signs of stress in many individuals, several species; 4 = advanced decline and/or death of many individuals and several or most species. {See – Section 3.2.4 f) of Native Vegetation Condition Assessment and Monitoring Manual for Western Australia; Department of Environment and Conservation; 2009}.		based on the site's weather data averages).
Implement GDAP system to prevent unauthorised clearing and minimise disturbance to E3/S6/ CSFS as far as practicable.	The GDAP system is a continuous monitoring system which requires the area that is intended for clearing to be authorised prior to any clearing being undertaken. Before authorisation will be given the area scheduled for clearance will be checked to determine whether the proposed disturbance area contains E3 and/or S6 vegetation communities and for the presence of conservation significant flora species (CSFS). If the check of the co-ordinates proposed for clearance indicates the presence of E3/S6/CSFS, a check will be made with the party requesting the GDAP as to whether it would be practicable for the proposed clearance to be modified to reduce the amount of E3/S6/CSFS impacted. A record will be kept of any E3/S6/CSFS that could not practically be avoided as well as any disturbance that was avoided as a result of amending the proposed clearance area. This will consist of the area of E3/S6 that was disturbed or was avoided measured in square metres and any CSFS disturbed or avoided measured by an estimate of the number of specimens of CSFS in the area disturbed or avoided. The baseline data is the existing record of vegetation community areas established as part of the PER and the record of individual CSFS. There is no actual monitoring location it happens at every location where any clearance is proposed; there is no	C	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the GDAP Process in the "Vegetation Clearance Restrictions": • Ministerial Statement (MS1046) has a condition for clearing limits of E3 and S6 vegetation communities within the approved 9,998 ha Development Envelope: • No more than 3,475 ha of E3 vegetation community • No more than 200 ha of S6 vegetation community • Clearance of these vegetation communities will be controlled by MRP's GDAP process (MRO-ENV-FM-007) The GDAP Form (MRO-ENV-FM-007) includes: • Questions: • Are conservation significant vegetation/flora present (E3, S6, Hakea sp. Great Victoria Desert, Hibbertia crispula, other CSFS)? • Have you moved the proposed ground disturbance to avoid/minimise conservation significant vegetation/flora? • The requirement for sign-off by an Approver, Department Manager, Applicant and Operator(s). The GIS has been updated during the reporting period and disturbance figures have been reconciled based



Management Action	Monitoring Requirement	Status*	Comments
	particular frequency it simply occurs every time any clearance is proposed, and the timing is before clearing is allowed to proceed each time clearing is proposed. Annual audit of authorised vs. actual cleared areas and of the requirements of Condition 8-1(1) & (2) and 9-1(1) & (2): • avoid direct impacts to Hakea sp. LAC 139 and LAC 140 including a 50 m buffer; • ensure that no more than 3,474 ha of vegetation community E3 and 200 ha of vegetation community S6 is cleared within the Project Development Envelope; • minimise direct and indirect impacts as far as practicable on all conservation significant flora species; and • minimise direct and indirect impacts as far as practicable on the vegetation communities E3 and S6.		on the spatial data entered for actual disturbance and its intersection with the E3 and S6 vegetation communities. The disturbance on E3 and S6 vegetation communities (Figure 24) and CSFS during the reporting period include the following: • 2.1 ha E3 vegetation community was cleared during the reporting period, and to date a total of 88.2 ha has been cleared (reconciled based on spatial data entry into the site's GIS, previously reported as a total of 92.6 ha). • No S6 vegetation community was cleared during the reporting period, and to date a total of 4.0 ha has been cleared (reconciled based on spatial data entry into the site's GIS, previously reported as a total of 3.9 ha). • CSFS clearance during the reporting period for GDAP (MRP_026) hydrogeological drilling investigation at the Ambassador deposit had the following Priority 4 flora species mapped at some of the drill sites: • Conospermum toddii All are within the Mining Proposal proposed disturbance footprint (pits and haul road). • No impacts occurred on the significant Hakea sp. Great Victoria Desert (L. Cockram LAC 139). There is only a Priority 1 listing for LAC 139 on the Department of Biodiversity, Conservation and Attractions List of Threatened and Priority Flora, and Florabase websites: • https://www.dbca.wa.gov.au/wildlife-and-ecosystems/plants/list-threatened-and-priority-flora • https://florabase.dbca.wa.gov.au/
No unauthorised access to remnant (unburnt) vegetation areas.	Annual assessment of aerial photography.	С	The majority of MRP environment has a history of fire and there are few remnant (unburnt) vegetation areas. Figure 25 is updated satellite imagery



Management Action	Monitoring Requirement	Status*	Comments
			showing the fire history from 1995 to 2023 at MRP and the areas not burnt since 1995 (white patches shown on Figure 25), collated by the Great Victoria Desert Biodiversity Trust (2023). There are no incidents of unauthorised access. Only a small area of remnant vegetation (no fire history post 1995) has been cleared to date, being the proposed new camp area and its road access. Clearance of this area was approved in 2021 through a GDAP (MRO-MRP_AR_004), a requirement was to where possible retain large established trees ("additional polygons (GDAP_Village_001_v2_ keep tree options.dxf) are being provided to site to assist in marking out trees that could be left in-situ as long as they don't interfere with equipment activities. These will be prioritised for importance in the planning guidance documents"). The MRP GIS can be reviewed prior to any GDAP approval to determine any potential impacts on remnant (unburnt since 1995) areas.
All new site personnel will undertake an environmental induction, emphasising importance of flora and vegetation in the MRP.	Annual audit of induction records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the importance of MRP flora and vegetation. The content of the induction includes details on: • Significant vegetation communities E3 and S6 and importance as habitat for the SHD • Ministerial Statement (MS1046) vegetation clearance restrictions • Clearance control using GDAP system • Conservation significant flora species.
All personnel involved in clearing of vegetation will undertake training on GDAP process, which includes sign-off	Annual audits of training records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted.



Management Action	Monitoring Requirement	Status*	Comments
by operators that they understand work involved, all such personnel will also have their understanding of their obligations under the Ministerial conditions refreshed as part of regular tool box meetings.			The induction includes information on the GDAP Process in the "Land Management Slides". The GDAP Form (MRO-ENV-FM-007) includes the requirement for sign-off by an Approver, Department Manager, Applicant and Operator(s). Site records show GDAP training/toolbox meeting of six personnel was undertaken on the 21/02/2024 for three submitted GDAPs.
Dust			
Dust management actions and monitoring.			Dust management actions and monitoring for flora and vegetation are included in Section 4.4 Air Quality.
Saline Water			
Dust suppression with saline water will only occur in operational areas after topsoil has been removed.	Annual audit of GDAP records which require dust suppression activities using saline water to be authorised.	NR	There are no GDAP records of dust suppression activities or requirement for topsoil removal prior to the activity occurring, as no dust suppression using saline water was undertaken during the reporting period. The GDAP Form (MRO-ENV-FM-007) includes questions on the requirement to remove topsoil: Has/will all topsoil be removed prior to dust suppression activities using paleodrainage channel (saline) groundwater.
The occurrence of overspray and the potential impacts on E3 and S6 vegetation communities is covered by Condition 13-1(1).	Condition 13-1(1): maintain soil quality within background concentrations established during baseline studies 10 m from areas where dewater has been used for dust suppression in Sandhill Dunnart Habitat (i.e. E3 and S6 vegetation communities).		Soil monitoring and management is discussed in Section 4.6 Soils.
Runoff from areas treated with saline water will be contained.	Annual audit of GDAP records which require dust suppression activities using saline water, including controls to be authorised.	NR	There are no GDAP records of dust suppression activities as no dust suppression was undertaken during the reporting period. The GDAP Form (MRO-ENV-FM-007) includes for 'controls' a section on "Conditions of Approval".



Management Action	Monitoring Requirement	Status*	Comments
Engineering controls (e.g. bunding or trenching) will be used around saline water sources to minimise the impact from saline spills.	Annual audit of GDAP records which require dust suppression activities using saline water, including are the necessary controls in place, to be authorised.	С	Bore MRWB07 to the south of MRP East, extracts paleodrainage channel groundwater. Engineering controls are in-place (refer to Section 4.6.4 and Figure 23). There are no GDAP records of dust suppression activities as no dust suppression was undertaken during the reporting period. The GDAP Form (MRO-ENV-FM-007) includes for 'çontrols' a section on "Conditions of Approval".
New site personnel will undertake an environmental induction, emphasising importance of flora and vegetation at MRP.	Annual audits of training records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the importance of MRP flora and vegetation.
Personnel involved in dust suppression activities will be trained so that they understand the potential risks to flora and vegetation; all such personnel will also have their understanding of their obligations refreshed as part of regular tool-box meetings.	Annual audits of training records.	NR	No water was used for dust suppression in the reporting period. The induction includes information on the importance of MRP flora and vegetation.
Only personnel who have undertaken environmental training will be able to operate dust suppression equipment (e.g. water cart).	Annual audits of training records.	NR	All personnel on-site have successfully completed the Environmental Induction (refer to Section 4.1 Environmental Induction). No dust suppression was undertaken in the reporting period. The GDAP Form (MRO-ENV-FM-007) includes the following question: Have personnel who will operate dust suppression equipment undertaken training in environmental sensitivities and safe application of saline water at MRP?
Ensure all equipment used in dust suppression activities are fit-for purpose to	Annual audit of shift records and/or fleet management data to establish correct machinery was used for dust suppression.	NR	No dust suppression was undertaken in the reporting period. The GDAP Form (MRO-ENV-FM-007) includes the following question:



Management Action	Monitoring Requirement	Status*	Comments
minimise impacts on flora and vegetation.			 Is all dust suppression equipment fit-for-purpose to minimise environmental impacts?
Weeds			
Minimise land surface disturbance as this may encourage weeds.	Annual reconciliation of open, closed, and operational areas.	С	During the reporting period the Company's GIS continued to be improved (refer to Section 4.2.2). The GIS provides reconciled and updated information with high resolution drone photos and the GDAP disturbance areas. This information is used in the DEMIRS's AER and MRF, and DWER's CER. The current focus on rehabilitation is the recent drilling disturbances.
High risk vehicles entering the MRP will be visually checked for weeds and seeds and receive a Weeds and Seeds Clearance Permit before entering the site.	Annual audit of Weeds and Seeds Clearance Permits and reconciliation against vehicles entering MRP.	С	The Company's database has 19 records of Weed Hygiene and Radiation Clearance Forms (DYL-ENV-FM-025) completed during the reporting period for drill rigs, support trucks, loader, grader, water cart and light vehicles, for example: • 23/08/2024, Caswell drilling had clearance for five pieces of equipment; • 23/09/2024, DDH1 drilling contractor had clearance for one piece of equipment; • 18/09/2024, DDH1 drilling contractor had clearance for five pieces of equipment; • 20/10/2024, DDH1 drilling contractor had clearance for six pieces of equipment; and • 13/12/2024, Greenlands Equipment had clearance for two pieces of equipment.
The eradication of weeds is covered by Condition 8-1(3).	Condition 8-1(3): Ensure the eradication of all weeds introduced in the Development Envelope as a result of the implementation of the proposal.	С	Mattiske Consulting Pty Ltd in August 2024 (Mattiske, 2024b) completed an introduced flora (weed) survey. The survey was extended beyond the FVMMP requirements to monitor the long-term vegetation monitoring plots by including higher risk areas such as operation areas, and also the vegetation health monitoring points established in August 2024 (Mattiske, 2024a).



Management Action	Monitoring Requirement	Status*	Comments
			This survey recorded weeds in two operational areas. One weed taxon was recorded, *Sonchus oleraceus. All populations of *Sonchus oleraceus were controlled at the time
			of the field survey by hand-pulling individual plants.
Monitoring of permanent vegetation quadrats.	Annual monitoring of existing permanent vegetation quadrats to identify any increase in number of weeds within MRP.	C	Since 2009 no weeds have been found during the five assessments at the long-term vegetation monitoring plots (Figure 22). The most recent survey was an introduced flora (weed) survey done by Mattiske Consulting Pty Ltd in August 2024, after above average rainfalls (Mattiske, 2024b). The survey was extended beyond the FVMMP requirements to monitor the long-term vegetation monitoring plots by including higher risk areas such as operation areas, and also the vegetation health monitoring points established in August 2024 (Mattiske, 2024a). Overall, the vegetation within the MRP is considered to be in excellent condition. This survey found no weeds within the long-term vegetation monitoring plots (undisturbed vegetation) visited, however recorded weeds in two operational areas. One weed taxon was recorded, *Sonchus oleraceus, listed as "Permitted – s11" in Western Australia under the Biosecurity and Agriculture Management Act 2007 (WA) (BAM Act) (Appendix A). No Weeds of National Significance listed under the EPBC Act were recorded during the assessment. No Declared Weeds listed under the BAM Act were recorded during the weed assessment. All populations of *Sonchus oleraceus were controlled at the time of the field survey by hand-pulling individual plants. *Sonchus oleraceus has a high
			chance of re-establishing, and ongoing monitoring of disturbed and high-traffic areas (i.e., waste landfill



Management Action	Monitoring Requirement	Status*	Comments
			facilities and exploration camp) will be undertaken.
New site personnel will undertake an environmental induction, emphasising importance of flora and vegetation at MRP.	Annual audits of induction records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the importance of MRP flora and vegetation.
Fire			
Regularly review Geoscience Australia Sentinel Hotspots to record bushfire activity in the MRP.	Annual audit of Sentinel Hotspots and comparison with pre-mine fire regime.	С	Geoscience Australia Sentinel Hotspots is only used at MRP as one of the tools to assist in tracking fires at the time they are burning in the Region. The preferred system for comparing the long-term fire regime is Great Victoria Desert Biodiversity Trust's Interactive Map (2023) which has currently fire history data from 1995 to 2023. This data has been included in the MRP GIS. Figure 25 shows the most recent data. There were no fires recorded in the MRP during the reporting period.
Clearing activities will be conducted in a manner that does not increase the frequency or severity of bushfires.	Annual audit of GDAP records which require that controls are in place to protect against starting a fire.	C	 The GDAP Form (MRO-ENV-FM-007) includes the following questions: Has fire risk been assessed? Are fire controls required? If fire controls are required, what are they? All three GDAPs submitted and authorised during the reporting period, had indicated that fire risk had been assessed: The hydrogeological drilling GDAP (MRP_026) stated the controls as: Hot work permit to define conditions; Fire extinguishers on all LV and HV; 1,000 L skid mount fire unit available at the Camp; and some work areas have a firebreak as they are within existing large, cleared areas (i.e. NAMB 14 & 09). The SDP GDAP (MRP_025) stated that the SDP is within an existing cleared area that forms a fire break. Fire extinguishers are fitted on all light and heavy vehicles, and 1,000 L



Management Action	Monitoring Requirement	Status*	Comments		
			skid mount fire units are available onsite.		
Establish Emergency Response Procedures (ERPs) to prevent operational activities starting a bushfire.	Annual audit of ERPs to ensure update and implemented across the MRP.	С	A full review of the ERP (MRO-WHS-PN-002) was undertaken in 2024, and issued under Deep Yellow as Version 1 on 30 April 2024. The ERP includes requirements for bushfires. The Corporate Crisis Response Plan (DYL-WHS-PN-017) will be reviewed in 2025.		

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage

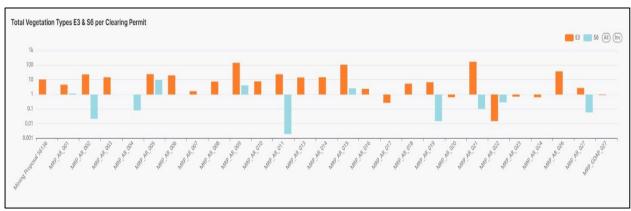


Figure 24: GIS Dashboard – E3 and S6 Vegetation Community Clearance

4.7.3 Current Monitoring Program

Based on the current status of Project activities the flora and vegetation monitoring programs include the following:

- Annual review of fire history in the MRP area from satellite imagery data collated by the Great Victoria Desert Biodiversity Trust.
- Monitoring of the cleared/disturbed areas as approved in the GDAP system through drone surveys, on the ground surveys and site Geographic Information System (GIS).
- Weed monitoring.
- Long-term vegetation monitoring.
- Rehabilitation trial monitoring;
- Dust monitoring, results are included in Section 4.4 Air Quality.
- Soil monitoring, results are discussed in Section 4.6 Soils.



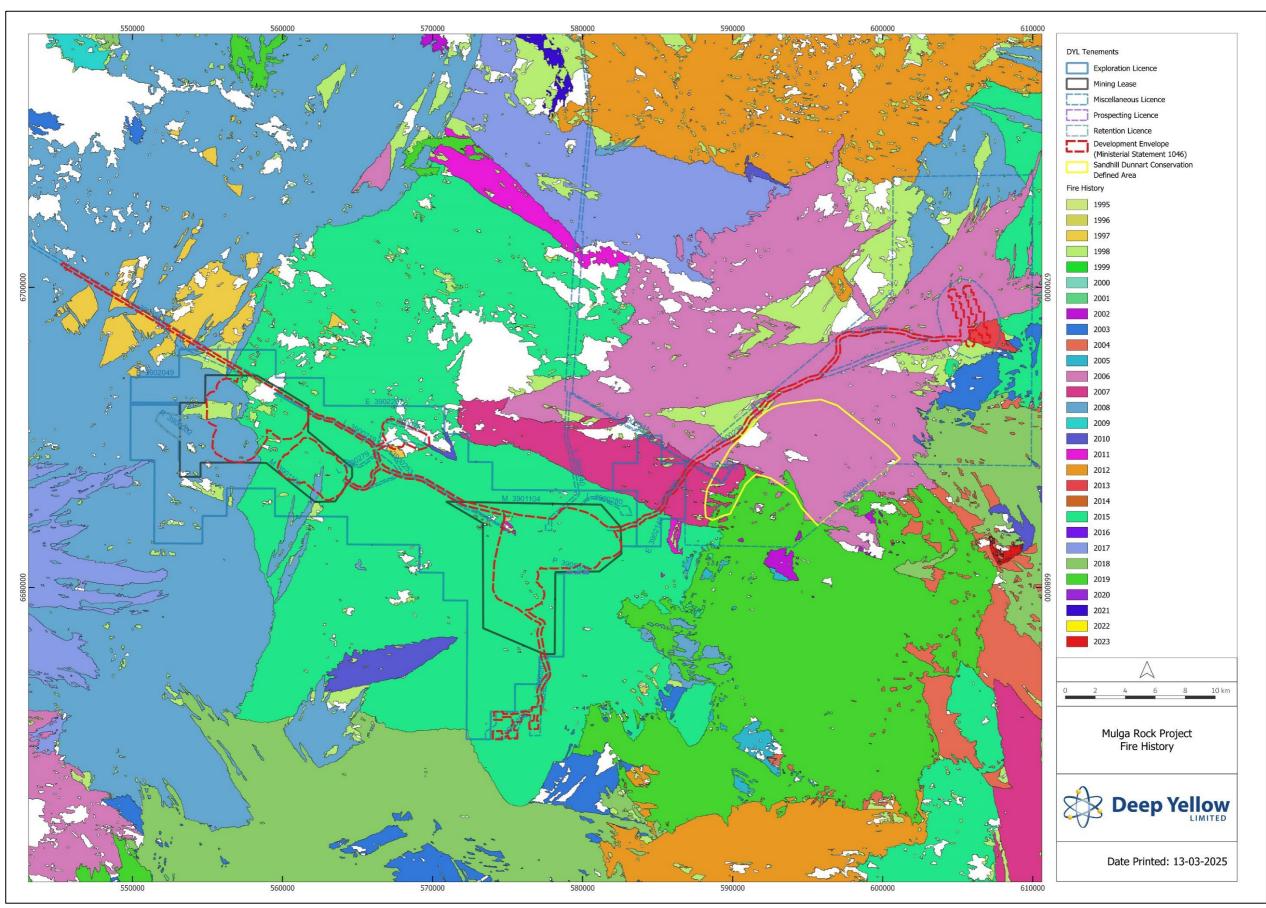


Figure 25: Fire History of MRP Area



4.7.4 Monitoring Results

4.7.4.1 Fire History

The MRP environment has a history of fire and there are few remnant (unburnt) vegetation areas. Figure 25 is generated from satellite imagery data collated by the Great Victoria Desert Biodiversity Trust (2023). The figure shows the fire history from 1995 to 2023 and the areas not burnt since 1995 (white patches shown on Figure 25).

The fire history data have been included in the MRP GIS, which can now be reviewed prior to any GDAP approval to determine any potential impacts on remnant vegetation (unburnt since 1995).

Only a small area of remnant vegetation (no fire history post 1995) within the Development Envelope has been cleared to date, being the proposed new camp area and its road access. Clearance of this area was approved in 2021 through a GDAP (MRO-MRP_AR_004), with a requirement to where possible retain large established trees.

4.7.4.2 Ground Disturbance Monitoring

The Project GDAP system requires spatial data of the proposed land disturbance/clearance to be entered in the site GIS so that the location can be checked to determine and minimise potential impacts on the following:

- The environment within the approved Development Envelope boundary and proposed disturbance footprint area. The environment is protected in accordance with MS 1046 conditions. The environment (as defined by Section 528 of the EPBC Act) is protected under Part 3 of the EPBC Act and listed as a protected matter in the Commonwealth's approval EPBC 2013/7083.
- Conservation significant flora species (CSFS). This includes the WA listed priority flora species identified during surveys, *Hakea* sp. Great Victoria Desert (L. Cockram LAC 139) and *Hibbertia crispula* which is listed as a vulnerable species and protected under Part 3 of the EPBC Act and listed as a protected matter in Commonwealth's approval EPBC 2013/7083.

Note that there is only a Priority 1 listing for LAC 139 and not LAC 140 on the Department of Biodiversity, Conservation and Attractions List of Threatened and Priority Flora, and Florabase websites:

- https://www.dbca.wa.gov.au/wildlife-and-ecosystems/plants/listthreatened-and-priority-flora
- o https://florabase.dbca.wa.gov.au/.
- Conservation significant fauna species. The species present at MRP is the Sandhill Dunnart (Sminthopsis psammophila) which is listed as an endangered species under both the Biodiversity Conservation Act 2016 (WA) and EPBC Act, and which is protected under Part 3 of the EPBC Act and listed as a protected matter in Commonwealth's approval EPBC 2013/7083.

Potential impacts are reduced by minimising disturbance of the Sandhill Dunnart's preferred habitat, provision of a Defined Area for their conservation and monitoring of the Sandhill Dunnart and feral animals. Implementation of feral animal controls to



reduce their numbers is based on the monitoring results and advice of a zoologist expert.

 Sandhill Dunnart habitat. The Sandhill Dunnart preferred habitat, being mapped vegetation communities E3 and S6.

The GDAP form requires inputs with the aim of minimising potential impacts on the Sandhill Dunnart habitat (E3 and S6 vegetation communities) and conservation significant flora species (Figure 26 is an extract from the GDAP Form).

Provide a breakdown of the disturbance for each type / activity within each tenement											
Tenement N	lo.	Type / Activity					Dimension	Number		Total (ha)	
vegetation / flora present			getation	S6 Ve	egetation		Hakea sp. Great Victoria Desert No clearing within 50 m) Hibbertia crispula			Other Conservation / Priority Flora	
(Check QGIS & 1	field inspection)		Yes 🗆	No □	Yes [□ No □		Yes □ No □		Yes □ No □	Yes □ No □
If any of the	above signif	icant v	egetatio	n / flora a	re pres	ent, provid	le d	etails in the table	e belo	ow	
Tenement No.	_	egetation Community Disturbance (ha)		Total (ha)		Conservation / Priority Species					
NO.	E3	E3 S6			Species Name				Number		
Have you moved the proposed ground disturbance to avoid / minimise conservation significant vegetation / flora						Yes □ No □					
_	etation / land			Undistu	rbed	Disturbe	ed	Rehabilitated		Weeds Present	Year area last burnt
(Multiple ca								YYYY			

Figure 26: GDAP Form E3 and S6 Vegetation Communities and CSFS

Monitoring of the cleared/disturbed areas as approved in the GDAP system is undertaken through drone surveys, on the ground surveys and audits/reviews of the spatial information within the site's Geographic Information System (GIS) (Figure 27). The GIS dashboard provides a summary of the GDAP applications and actual clearance undertaken (Figure 28).

The GIS also shows any E3 and S6 vegetation communities and conservation significant flora species that were disturbed, as they could not be practically avoided, as well any disturbance that was avoided as a result of amending the proposed clearance area. Figure 24 shows an example of the GIS dashboard for monitoring the clearance of vegetation communities E3 and S6.



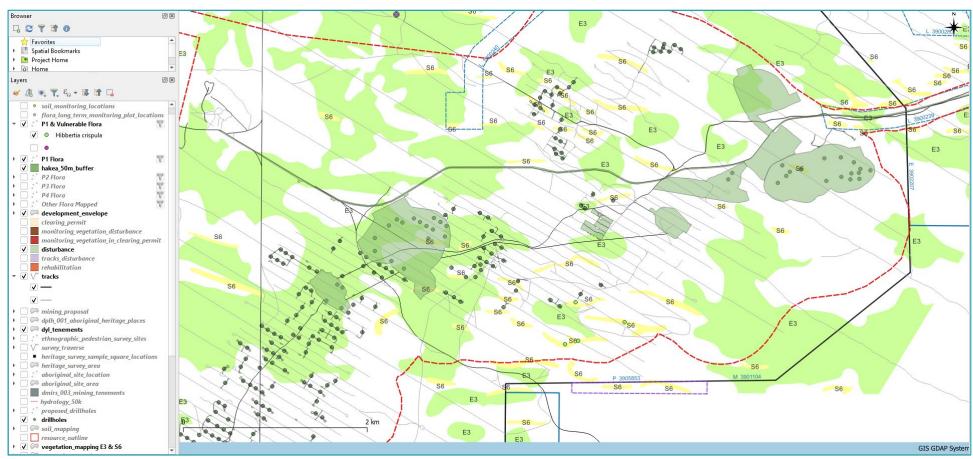


Figure 27: Example of GIS used for GDAP Approvals, Reviews and Audits



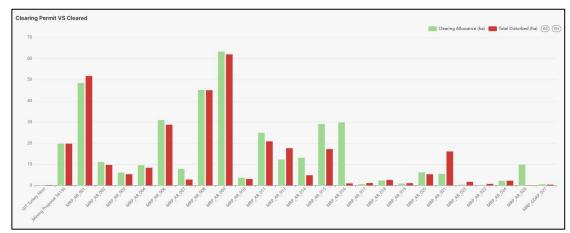


Figure 28: GIS Dashboard Showing GDAP Proposed Versus Actual Disturbance

Disturbance

During the reporting period there was no GDAP approved or any clearing/disturbance outside of the approved Development Envelope boundary.

The GIS has been updated during the reporting period and disturbance figures have been reconciled based on the spatial data entered for actual disturbance within the Development Envelope. 5.2 ha was disturbed during the reporting period, therefore, to date a total of 309 ha within the Development Envelope.

The disturbance on E3 and S6 vegetation communities (Figure 24) and CSFS within the Development Envelope during the reporting period include the following:

- 2.1 ha E3 vegetation community was cleared during the reporting period, and to date a total of 88.2 ha has been cleared (reconciled based on spatial data entry into the site's GIS, previously reported as a total of 92.6 ha).
- No S6 vegetation community was cleared during the reporting period, and to date a
 total of 4.0 ha has been cleared (reconciled based on spatial data entry into the site's
 GIS, previously reported as a total of 3.9 ha).
- CSFS clearance during the reporting period for GDAP (MRP_026) hydrogeological drilling investigation at the Ambassador deposit had the following Priority 4 flora species mapped at some of the drill sites:
 - Conospermum toddii

All are within the Mining Proposal proposed disturbance footprint consisting of pits and haul road.

- No impacts occurred on the significant Hakea sp. Great Victoria Desert (L. Cockram LAC 139). There is only a Priority 1 listing for LAC 139 on the Department of Biodiversity, Conservation and Attractions List of Threatened and Priority Flora, and Florabase websites:
 - o https://www.dbca.wa.gov.au/wildlife-and-ecosystems/plants/list-threatened-and-priority-flora
 - o https://florabase.dbca.wa.gov.au/

Total disturbance and rehabilitation by tenement are included in the on-line AER report. Details of the areas disturbed and rehabilitated are shown in Figure 29 and Figure 30.



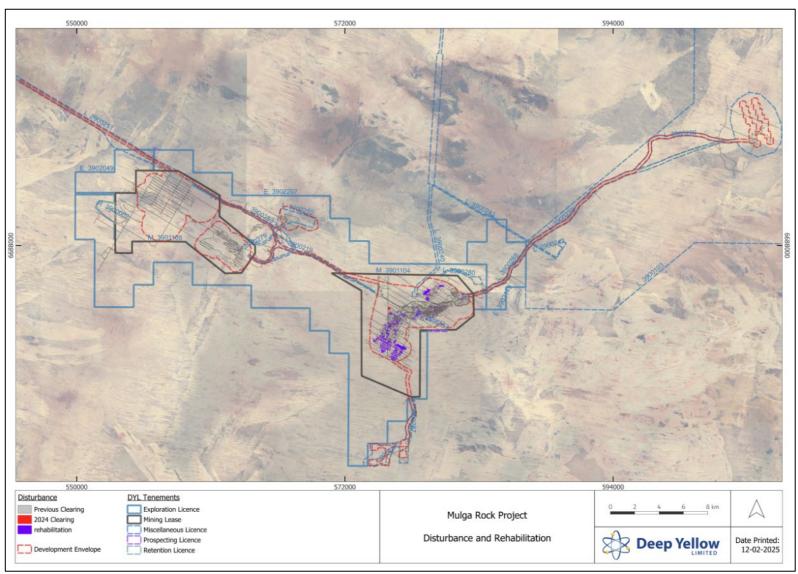


Figure 29: MRP Disturbance and Rehabilitation



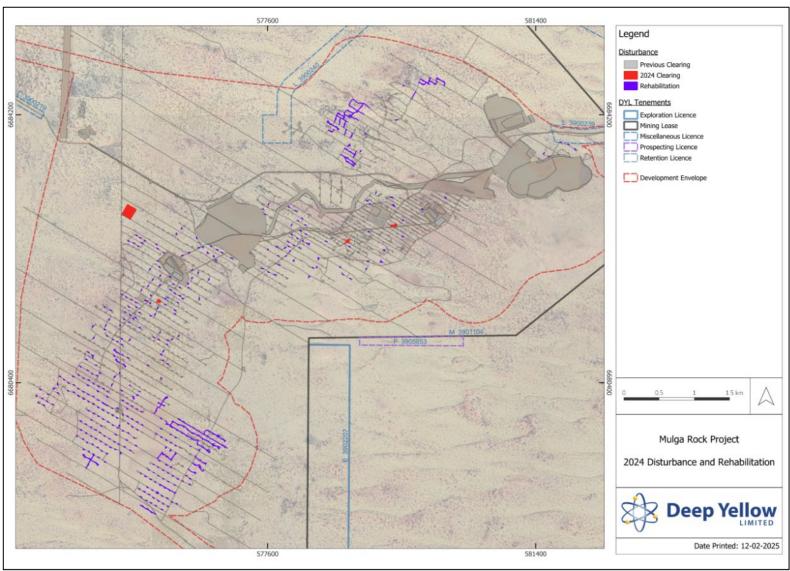


Figure 30: M39/1104 Disturbance and Rehabilitation

Mulga Rock Project

Reporting Period: 16 December 2023 to 15 December 2024



Rehabilitation

Of the areas disturbed by the 2022-2023 drilling program that consisted a total of 719 aircore holes for the purposes of geo-metallurgical study (63 holes), grade variability and metallurgical analysis (233 holes) and infill to upgrade resource classification for uranium and critical metals (423 holes), 63 holes were rehabilitated by the end of June 2023. The remaining 656 holes were rehabilitated in 2024 as follows:

- The 233 grade and metallurgical analysis holes, which are located on a cleared area called Tim's Square, have had all holes plugged and sample bags removed and disposed.
- The 423 infill holes have all been plugged, sample bags removed and disposed and rehabilitation earthworks on drill pads completed (topsoil replaced and ripped).
 Some access tracks were also rehabilitated.

The rehabilitation of the exploration disturbances described above totals 11.1 ha to Stage 2 – preliminary earthworks.

4.7.4.3 Weed Monitoring

Since 2009 no weeds have been found during the five assessments of the long-term vegetation monitoring plots (Figure 22). A review of the weed monitoring program was undertaken during the reporting period with the main aim to target higher risk areas where weeds are more likely to occur (i.e. waste landfill facilities, vehicle washdown bay), rather than just monitoring the long-term vegetation monitoring plots.

Mattiske Consulting Pty Ltd in August 2024 completed an introduced flora (weed) survey, which was done after above average rainfalls (Mattiske, 2024b). This survey was extended beyond the FVMMP requirements to monitor the long-term vegetation monitoring plots by also reviewing operation areas and the vegetation health monitoring points established in August 2024 (Mattiske, 2024a).

Overall, the vegetation within the MRP is considered to be in excellent condition. This survey found no weeds within the long-term vegetation monitoring plots (undisturbed vegetation) visited, however recorded weeds in two operational areas. One weed taxon was recorded, *Sonchus oleraceus, listed as "Permitted – s11" in Western Australia under the Biosecurity and Agriculture Management Act 2007 (WA) (BAM Act) (Appendix A). No Weeds of National Significance listed under the EPBC Act were recorded during the assessment. No Declared Weeds listed under the BAM Act were recorded during the weed assessment.

All populations of *Sonchus *oleraceus* were controlled at the time of the field survey by hand-pulling individual plants.

*Sonchus oleraceus has a high chance of re-establishing, and ongoing monitoring of disturbed and high-traffic areas (i.e., waste landfill facilities and exploration camp) will be undertaken.

The Company's database has 19 records of Weed Hygiene and Radiation Clearance Forms (DYL-ENV-FM-025) completed during the reporting period for drill rigs, service/support trucks, water truck and light vehicles, for example:

- 23/08/2024, Caswell drilling had clearance for five pieces of equipment;
- 23/09/2024, DDH1 drilling contractor had clearance for one piece of equipment;

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- 18/09/2024, DDH1 drilling contractor had clearance for five pieces of equipment;
- 20/10/2024, DDH1 drilling contractor had clearance for six pieces of equipment; and
- 13/12/2024, Greenlands Equipment had clearance for two pieces of equipment.

4.7.4.4 Long-term Vegetation Monitoring

Vegetation monitoring has been ongoing at the MRP since 2007 to provide baseline data. Permanent plots ($50 \times 50 \text{ m}$) were established to measure direct impacts to vegetation communities and the effectiveness of future rehabilitation efforts. The permanent plots were established between 2009 and 2010 by Mattiske Consulting Pty Ltd. Additional plots were established in 2015 after a fire burnt 79,204 ha of the MRP (Figure 25). The process involved selecting permanent plots each of $50 \times 50 \text{ m}$ within the MRP and surrounding area.

Four flora and vegetation assessments to compare changes in composition have been undertaken between initial establishment by Mattiske Consulting in 2009 and 2010, assessment 2 in September 2015 (Mattiske, 2015), assessment 3 in November 2016 (Mattiske, 2017) and assessment 4 in June 2022 (360 Environmental, 2023a).

As discussed in the Weed Monitoring section above, the long-term vegetation monitoring plots were reviewed by Mattiske Consulting Pty Ltd in August 2024 for the presence of introduced flora (Mattiske, 2024b). No weeds were found in the long-term vegetation monitoring plots.

4.7.4.5 Rehabilitation Trial Monitoring

No rehabilitation trials are currently being undertaken. The review of the rehabilitation trials established in 2017 on the Geotechnical Investigation Trench's (GIT) landforms was completed in 2022 with a final assessment by 360 Environmental (360 Environmental, 2023b). The rehabilitation trials on the GITs have served their purpose, with the following key learnings that can be applied to any future trials and rehabilitation programs:

- Topsoil is critical for the re-establishment of native vegetation;
- The Eocene and Calcrete substrates are required for the re-establishment of native vegetation;
- Despite no presence of fire-ephemeral species in the trials, a general and fire species seed mix should be applied;
- Incorporate wind barriers to protect topsoil and seed mixes from wind erosion; and
- Larger plots should be used in any future trials (50 x 50 m plots) or if further monitoring is undertaken on these existing trials, then the whole trial area of 4 x 18 m treatments should be used rather than

4.7.4.6 GIT Monitoring

The East GIT and West GIT were constructed in 2016 and consisted of an open trench and surrounding overburden landforms (OLs); (Figure 31 and Figure 32). The GITs were placed on care and maintenance in July 2016 and have been left open for the rehabilitation trial and geotechnical investigations.

Geotechnical investigations of erosion and stability were undertaken in February 2023 (MineGeoTech, 2023). The report indicated that the East GIT as expected was continuing to slowly



deteriorate from rainfall runoff, with the largest deterioration at the northwestern end by the switch back. The West GIT was deteriorating more significantly than the East GIT but appeared relatively stable compared to the 2021 inspection, with changes to the dune sand and minor changes in the Northern and Western pit walls failures. Overall, the walls appear to be relatively stable in current conditions. The GITs have now been open for longer than what will occur with the mining of the deposit, as the pits will be backfilled with the pre-stripped sands above the thin ore layer. However, the GITs provide an insight into the long-term geotechnical stability of proposed in-pit tailings facilities within mining voids.

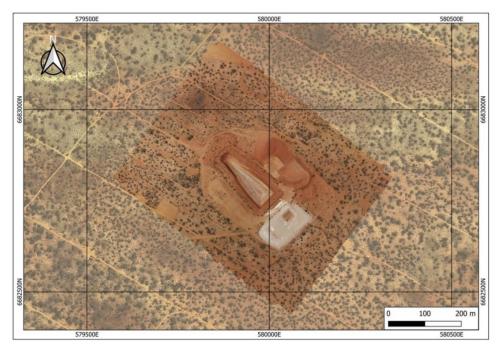


Figure 31: East GIT – 17 January 2023

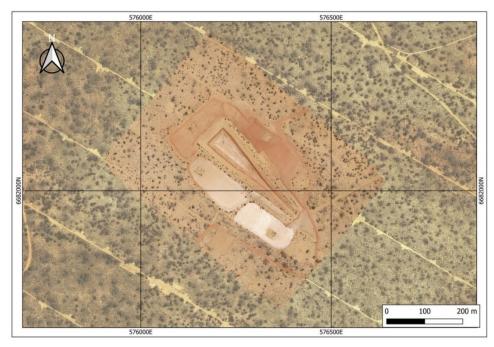


Figure 32: West GIT – 18 January 2023



Monitoring of the stability of the 2016 Ambassador trial pits landforms has been carried out since late 2021 using high-resolution drone imagery and a Digital Surface Model generated through photogrammetry acquired in-house (Figure 33).

Post-processing of the data was carried out in-house to produce orthomosaic images and 3D dense point clouds. The data generated complements ground-based LIDAR surveys completed shortly after the excavation of the trial pits (2016-2017) and associated landforms and provides a baseline dataset to assess the long-term erosion and deposition rates in that environment, as well as geotechnical stability of mining voids and subsequent conversion to in-pit storage facilities.

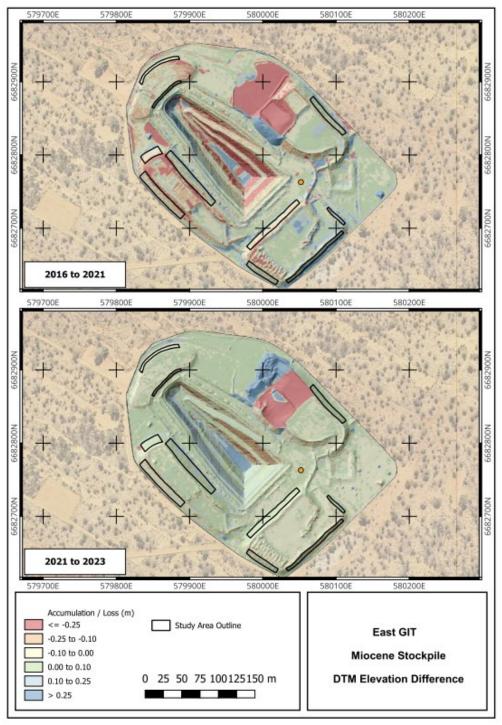


Figure 33: Digital Surface Model – East GIT Elevation Difference



4.8 Fauna

The potential impacts on fauna are managed through the Terrestrial Fauna Monitoring and Management Plan (EMP-EHS 002) (TFMMP) and Sandhill Dunnart Conservation Plan (SDCP).

4.8.1 Objective and Management Targets

The objective of the TFMMP is to maintain representation, diversity, viability and ecological function at the species, population and community level within the MRP as a result of the implementation of the Project.

The key management target is to minimise direct and indirect impacts, as far as practicable, on conservation significant fauna due to operational activities. This is being done through fauna surveys, such as monitoring the Sandhill Dunnart (SHD) and feral animals' presence using camera traps, minimising impacts to vegetation, and subsequently conserving and protecting fauna habitats. As conservation of significant fauna species is also reliant on protecting vegetation and habitat, the management approach is done in combination with the Flora and Vegetation Monitoring and Management Plan (EMP-EHS-001) (FVMMP).

4.8.2 Monitoring Requirements

Table 14 shows the status of compliance with the TFMMP requirements to achieve the management targets for the Project.

Table 14: Terrestrial Fauna Management Actions and Monitoring Status

Management Action	Monitoring Requirement	Status*	Comments			
Clearing/Disturbance of	Clearing/Disturbance of Habitat					
No clearing outside of the approved Development Envelope.	Monitoring of this will be a continuous process with a requirement, each time that any clearing is proposed, for a GDAP to be issued. Annual audit of cleared/disturbed areas recorded in the GDAP system against approved Development Envelope boundary.	С	During the reporting period the Company's GIS continued to be improved (refer to Section 4.2.2). The GIS provides reconciled and updated information with high resolution drone photos and the GDAP disturbance areas. This information is used in the DEMIRS's AER and MRF, and DWER's CER. There was no GDAP approved or any clearing/disturbance outside of the approved Development Envelope boundary. Further information is provided in Section 4.7.4.2 Ground Disturbance Monitoring.			
No unauthorised clearing outside of the approved Disturbance Footprint.	Monitoring of this will be a continuous process with each authorised clearing activity subject to a coordinate check after clearing has taken place to ensure that what was approved has been complied with.	С	The Company's GIS provides reconciled and updated information with high resolution drone photos and comparison between the GDAP approval and actual disturbance footprint area can be made (refer to Section 4.7.4.2).			



Management Action	Monitoring Requirement	Status*	Comments
	Annual audit of cleared/disturbed areas in the GDAP system against approved Disturbance Footprint area.		Drone and ground surveys are done as required. This information is used in the DEMIRS's AER and MRF, and DWER's CER.
Implement GDAP system to prevent unauthorised clearing	The GDAP system when implemented is a continuous process that is related to activities taking place – so rather than having a particular frequency or duration it happens each time activity is proposed and requires authorisation prior to the activity being allowed and follow up measures to ensure that what was approved is complied with including closure and rehabilitation obligations. Annual audit of authorised versus actual cleared areas and the requirements of Condition 9-1 (1) and (2): The proponent shall manage the implementation of the Proposal to meet the following environmental objectives: (6) minimise direct and indirect impacts as far as practicable on all conservation significant flora species; and (7) minimise direct and indirect impacts as far as practicable on the vegetation communities E3 and S6.	C	Refer to Section 4.7.4.2. The GIS has been updated during the reporting period and disturbance figures have been reconciled based on the spatial data entered for actual disturbance and its intersection with the E3 and S6 vegetation community polygons. The disturbance on E3 and S6 vegetation communities (Figure 24) and CSFS during the reporting period include the following: • 2.1 ha E3 vegetation community was cleared during the reporting period, and to date a total of 88.2 ha has been cleared (reconciled based on spatial data entry into the site's GIS, previously reported as a total of 92.6 ha). • No S6 vegetation community was cleared during the reporting period, and to date a total of 4.0 ha has been cleared (reconciled based on spatial data entry into the site's GIS, previously reported as a total of 3.9 ha). • CSFS clearance during the reporting period for GDAP (MRP_026) hydrogeological drilling investigation at the Ambassador deposit had the following Priority 4 flora species mapped at some of the drill sites: • Conospermum toddii • All are within the Mining Proposal proposed disturbance footprint (pits and haul road). • No impacts occurred on the significant Hakea sp. Great Victoria
No unauthorised access to remnant (unburnt) vegetation areas.	The monitoring is through the GDAP system and therefore is continuous and applies each time clearing activities are proposed. Annual assessment of aerial photography.	С	Desert (L. Cockram LAC 139). The majority of MRP environment has a history of fire and there are few remnant (unburnt) vegetation areas. Refer to Section 4.7.4.1 Fire History and Figure 25. Figure 25 is updated satellite imagery showing the fire history from 1995 to 2023 at MRP and



Management Action	Monitoring Requirement	Status*	Comments
			the areas not burnt since 1995 (white patches shown on Figure 25), collated by the Great Victoria Desert Biodiversity Trust (2023).
			There are no incidents of unauthorised access.
			Only a small area of remnant vegetation (no fire history post 1995) has been cleared to date, being the proposed new camp area and its road access. Clearance of this area was approved in 2021 through a GDAP (MRO-MRP_AR_004), a requirement was to where possible retain large established trees ("additional polygons (GDAP_Village_001_v2_ keep tree options.dxf) are being provided to site to assist in marking out trees that could be left in-situ as long as they don't interfere with equipment activities. These will be prioritised for importance in the planning guidance documents"). The MRP GIS can be reviewed prior to any GDAP approval to determine any potential impacts on remnant (unburnt since 1995) areas.
All new site personnel will undertake an environmental induction, emphasising importance of flora and vegetation in the MRP. This will be supplemented by the inclusion of refreshers into regular tool-box meetings.	Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. Annual audit of induction records.	С	Refer to Section 4.1 Environmental Induction. The Company's database induction records show that in the reporting period a total of 106 people (consisting of 31 employees and 75 contractors and visitors) successfully completed the Environmental and Community Relations Induction.
All personnel involved in clearing of vegetation will undertake training on GDAP process, which includes sign-off by operators that they understand work involved. This will be supplemented by the inclusion of refreshers into regular tool-box meetings.	Monitoring of whether personnel involved in clearing vegetation have been trained on GDAP processes will be affected through the signing of training records testifying that the training has been completed and been understood. Annual audit of training records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the GDAP Process in the "Land Management Slides". The GDAP Form (MRO-ENV-FM-007) includes the requirement for sign-off by an Approver, Department Manager, Applicant and Operator(s). Site records show GDAP training/toolbox meeting of six personnel was undertaken on the



Management Action	Monitoring Requirement	Status*	Comments
			21/02/2024 for three submitted GDAPs.
Trenching Activities			
All trenching activities must be authorised and recorded in the GDAP system.	Monitoring of this will be a continuous process with a requirement, each time that any trenching activity is proposed, for a GDAP to be issued. Annual audit of authorised versus actual trenching activities recorded in the GDAP system.	С	 The GDAP Form (MRO-ENV-FM-007) has a question on trenching: Will the proposed works include open trenching? (If yes, frequency of fauna inspections to be based on risk). A Sample Disposal Pit (SDP), which is an open pit located in the Princess Pit cleared footprint, was constructed in March 2024. The GDAP contained conditions that meet the TFFMP Management Actions.
All trenches or sumps >1.2 m depth, remaining open for >24 hours, must have accessible points of egress for fauna species.	Monitoring of this will be a continuous process with every authorised trench or sump subject to a specification check after development to ensure that what was approved has been complied with. Annual audit of Compliance Records stored in the GDAP system.	С	A SDP, which is an open pit located in the Princess Pit cleared footprint, was constructed in March 2024. The open pit has a depth of 2.5 m and is open for >24 hours. The GDAP contained conditions that meet the TFFMP Management Actions. Figure 34 shows the egress points.
All trenches or sumps >1.2 m depth, remaining open for >24 hours, must be checked daily for egress and fauna by a suitably trained person.	Trenches or sumps that require checking will be monitored daily whilst the risk exposure exists. Daily inspections will happen first thing in the morning. Annual audit of Compliance Records stored in the GDAP system.	С	A SDP, which is an open pit located in the Princess Pit cleared footprint, was constructed in March 2024. The open pit has a depth of 2.5 m and is open for >24 hours. The GDAP contained conditions that meet the TFFMP Management Actions, the area is visually inspected. Figure 34 shows the egress points.
All trenches will be backfilled as soon as practicable after completion of work.	Monitoring of this will be through the GDAP system and therefore is a continuous process. The Permit application will specify the expected duration and hence the time until appropriate rehabilitation (i.e. backfilling) is required. If the work has not been completed in the time allocated – an extension will be required. If the work has been completed, then the system will require details and/or evidence on the rehabilitation undertaken. Annual audit of Compliance Records stored in the GDAP system.	C	The SDP is still in use, therefore remains open and is being progressively backfilled (Figure 34).



Management Action	Monitoring Requirement	Status*	Comments
All impacts on conservation significant fauna species from trenching activities, including sumps, will be recorded in an onsite register.	This requirement only materialises in the event of an impact upon conservation significant fauna. Any such impact would be notified to the register of the on-site register. Annual audit of Conservation Significant Fauna Impact Register.	C	A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Native Fauna Trench & Sump Impact Register. The information required on the register is: Date of register entry Date and time observed Description of location Name of person who made observation Name of native fauna Status of native fauna (alive, injured, dead) Photograph Comment/action taken. The requirement to report impact on conservation significant fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008). There are no records registered for presence or impact on conservation significant fauna.
All personnel involved in trenching activities will undertake training to help identify conservation significant fauna species and highlight how this activity could impact on fauna species and what should be done to minimise potential impacts. This will be supplemented by the inclusion of refreshers into regular tool-box meetings.	Monitoring of whether personnel involved in trenching activities have been trained in the identification of conservation significant fauna and in avoiding potential impacts, will be affected through the maintenance of signed training records testifying that the training has been completed and been understood. Annual audit of training records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted.
Open Sources of Water			
All open sources of water, that are accessible to terrestrial fauna, must be fenced to withstand camels and other large herbivores.	The creation of an open source of water will involve activities that require preauthorisation through the GDAP system. The GDAP system will require that the authorisation required to create an open source of water includes suitable fencing to prevent fauna entry into the area. As such the monitoring is	С	The GDAP Form (MRO-ENV-FM-007) has a question for an open source of water: • Does the proposed works have an open water body? (If yes, fauna egress must be provided, and frequency of fauna inspections is



Management Action	Monitoring Requirement	Status*	Comments
	continuous and triggered prior to such activity. Annual audit of Compliance Records stored in the GDAP system.		to be based on risk & camera traps may be required). The open source of water at Bore MRWB07 is fenced (refer to Figure 23). There are no GDAPs submitted during the reporting period for the establishment of an open source of water.
All open sources of water, that are accessible to terrestrial fauna, must have egress points suitable for small mammals and reptiles.	The creation of an open source of water will involve activities that require preauthorisation through the GDAP system. The GDAP system will require that the authorisation required to create an open source of water includes egress point(s) associated with the water located to enable fauna egress. As such the monitoring is continuous and triggered prior to such activity. Annual audit of Compliance Records stored in the GDAP system.	С	 The GDAP Form (MRO-ENV-FM-007) has a question for an open source of water: Does the proposed works have an open water body? (If yes, fauna egress must be provided, and frequency of fauna inspections is to be based on risk & camera traps may be required). The open source of water at Bore MRWB07 has fauna egress (refer to Figure 23). There are no GDAPs submitted during the reporting period for the establishment of an open source of water.
All open sources of water, that are accessible to terrestrial fauna, must be regularly checked for fauna species.	Monitoring of open sources of water (all of which will have been fenced) will be undertaken on a regular basis with the frequency determined by a balance between ease of inspection and risk to fauna. Most open sources of water (fenced) will be in close proximity to everyday work activities and will be subject to daily inspections despite the absence of risk. Where open water sources (fenced) are remote from daily activities, inspection frequency will be aligned with risk. Initial inspections will be weekly, and frequency will subsequently be increased or decreased depending on observations concerning the effectiveness and durability of the fencing. Annual audit of Compliance Records stored in the GDAP system.	С	Regular visual inspections are undertaken. Inspections are also completed using the Workplace Inspection Checklist Mining (MRO-WHS-CH-012), which includes a section 'Water Bores & Turkey Nest Dam'. The Company's database has 24 inspection records uploaded during the reporting period. On some occasions comments made were: • Increase water level of the Turkey Nest to maintain integrity of HDPE liner.
All impacts on conservation significant fauna species from open sources of water	This requirement only materialises in the event of an impact upon conservation significant fauna. Any such impact would be notified to the register of the on-site register.	С	A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Native Fauna Open Water Impact Register. The



Management Action	Monitoring Requirement	Status*	Comments
will be recorded in an on-site register.	Annual audit of Conservation Significant Fauna Impact Register.	Status	information required on the register is: Date of register entry Date and time observed Description of location Name of person who made observation Name of native fauna Status of native fauna (alive, injured, dead) Photograph Comment/action taken. The requirement to report impact on conservation significant fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008). There are no records registered in the reporting period for impacts on conservation significant fauna species.
Speed limits should be set to as low as practicably possible to minimise vehicle strikes. Speed limits will be initially set as follows: Site access road – 80 km/hr Plant, village and aerodrome access roads – 60 km/hr Haul roads/site tracks – 40 km/hr.	All vehicle strikes will be recorded in an on-site register. This register will be monitored as vehicle strikes are recorded to determine whether the speed limits have been set at an appropriate level consistent with minimising vehicle strikes to the lowest extent practicable. Annual audit of Conservation Significant Fauna Impact Register.	С	Speed limits and restrictions on driving off-road are in-place as informed in the MRP Site Induction (MRO-WHS-PP-001), for example includes: Tropicana access road 80 km/hr PNC/Nippon Highway/Main access road 60 km/hr Haul roads and site tracks 40 km/hr Camp and laydown areas 20 km/hr. Speed limits are signposted on-site. A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Native Fauna Vehicle Strike Register. The requirement to report impact on conservation significant fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008).



Management Action	Monitoring Requirement	Status*	Comments
			There are no records of vehicle strikes with native fauna registered during the reporting period.
Limit driving and the number of vehicles on the roads at dawn and dusk, where practicable.	All vehicle strikes will be recorded in an on-site register. This register will be monitored as vehicle strikes are recorded to determine whether the speed limits have been set at an appropriate level consistent with minimising vehicle strikes to the lowest extent practicable. Annual audit of Conservation Significant Fauna Impact Register.	С	MRP Site Induction (MRO-WHS-PP-001) states in the Site Rules – Speed Limits: • Travel times are between 5:00 am – 7:00 pm during summer, and are dependent on daylight hours in winter, and emergency situations. A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Native Fauna Vehicle Strike Register. The requirement to report impact on conservation significant fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008). There are no records of vehicle
All vehicle strikes with conservation significant	All vehicle strikes will be recorded in an on-site register as soon as is practicable	С	strikes with native fauna registered during the reporting period. A register is in-place – Mulga Rock Heritage & Environment Register
fauna species will be recorded in an on-site register.	recorded in an on-site continuous process that happens each		(MRO-ENV-RG-001) – Native Fauna Vehicle Strike Register. The information required on the register is: • Date of register entry • Date and time vehicle strike
			occurred or observedDescription of location
			Name of person who made observation
			Name of native fauna
			 Status of native fauna (alive, injured, dead)
			Photograph
			Comment/action taken.
			The requirement to report impact on conservation significant fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008).
			There are no records of vehicle strikes with native fauna registered during the reporting period.



Management Action	Monitoring Requirement	Status*	Comments
Animals struck by vehicles will be removed from roads and treated accordingly, with the pouches of female marsupials checked for live young.	All vehicle strikes will be recorded in an on-site register. The information recorded will include details of actions taken. This is a continuous process that happens each time a strike occurs. Annual audit of Conservation Significant Fauna Impact Register.	С	A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Native Fauna Vehicle Strike Register, which includes an input field 'Comment/action taken'. The requirement to report impact on conservation significant fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008). There are no records of vehicle strikes with native fauna registered during the reporting period.
All new site personnel will undertake an environmental induction to help identify conservation significant fauna species in the MRP. This will be supplemented by the inclusion of refreshers into regular tool-box meetings.	Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training in the identification of conservation significant fauna. Annual audit of induction records.	С	Refer to Section 4.1 Environmental Induction. The Company's database induction records show that in the reporting period a total of 106 people (consisting of 31 employees and 75 contractors and visitors) successfully completed the Environmental and Community Relations Induction. The induction includes information on the Sandhill Dunnart, its identification and habitat.
Feral Animals			
All food sources, including bins and landfill, will be appropriately contained and/or fenced to withstand camels and other large herbivores to prevent feral animals accessing and being attracted to them.	Containment of food sources will be regularly monitored and maintained to ensure they are fit-for-purpose and functioning appropriately. The frequency of monitoring will be determined by a balance between ease of inspection and risk to fauna. Most food sources (such as bins) will be in close proximity to everyday work activities and will be subject to daily inspections despite the absence of risk. Where potential food sources (fenced) are remote from daily activities (such as landfill), inspection frequency will be aligned with risk. Initial inspections will be weekly, and frequency will subsequently be increased or decreased depending on observations concerning the effectiveness and durability of the fencing. All potential food sources, in addition to being checked to ensure that protection measures to prevent access to feral	С	Due to low numbers of personnel onsite during the reporting period (an average over the reporting period of approximately four people per day, which is a decrease from the previous reporting period which averaged approximately ten people per day), volumes of wastes disposed at the fenced landfill (Figure 37) are low. With the facility being fenced and low waste volumes and wastes covered, the interest from feral animals is considered a low risk. The completed Workplace Inspection Checklist Rubbish Tip (MRO-WHS-CH-018) that was reviewed raised no issues. The inspections and regular visits are considered an adequate level of monitoring based on the current low level of risk. Bins on-site have lids.



Management Action	Monitoring Requirement	Status*	Comments
	animals are in-place and effective, will also be monitored continuously by cameras with the captured images downloaded analysed on a quarterly basis.		
All open sources of water, that are accessible to terrestrial fauna, must be fenced to withstand camels and other large herbivores to prevent feral animals accessing and being attracted to them.	Fencing of open water sources, accessible to terrestrial fauna, will be regularly monitored and maintained to ensure they are fit-for-purpose and functioning appropriately. The frequency of monitoring will be determined by a balance between ease of inspection and risk to fauna. All potential water sources, in addition to being checked to ensure that protection measures to prevent access to feral animals are in-place and effective, will also be monitored continuously by cameras with the captured images downloaded analysed on a quarterly basis.	С	Bore MRWB07 facility is fenced (refer to Figure 23) and monitored with a camera trap. Nothing was captured on the camera during this reporting period.
Sightings of feral animals within the MRP, excluding the transport route, will be recorded in an on-site register to help monitor their numbers.	The recording of any sighting of feral animals is a continuous process with site personnel	С	A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Fauna Register. The information required on the register is: • Date of register entry • Date and time observed • Fauna type (native or feral) • Description of location • Name of person who made observation • Name of fauna • Number observed • Status of fauna (alive, injured, dead) • Photograph • Comment/action taken. The requirement to report sightings of native and feral fauna for inclusion in a register is contained within the Environment and Community Relations Induction (MRO-ENV-PP-008). There are eight records of native fauna on the register during the reporting period, consisting of: • Dingos • Bungarrow lizard



Management Action	Monitoring Requirement	Status*	Comments
			• Emus
			Australian Bustard
If required, feral animal numbers will be controlled by the Department of Biodiversity, Conservation and Attractions approved baiting, trapping or muster techniques.	Feral animal monitoring will take place via reported sightings, and regular monitoring (including camera monitoring) of sites expected to attract feral animals (such as food sources and water sources). Annual audit of on-site Feral Animal Register.	С	A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Fauna Register. No feral animals have been recorded on the register. The SHD report for the period November 2023 to May 2024 is in Appendix 4 (GHD, 2025). This report includes feral animal observations obtained from the network of 25 monitoring quadrats (2 cameras per site) within the Defined Area. Feral animals are present in low numbers, a summary is included in Section 4.8.4 Monitoring Results. No feral animal control programs were undertaken during the reporting period.
New site personnel will undertake an environmental induction illustrating the impact that feral animals may cause to conservation significant fauna species and how they can help reduce the feral animal numbers within the MRP. This will be supplemented by the inclusion of refreshers into regular tool-box meetings.	Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training in the impacts of feral animals upon conservation significant fauna. Annual audit of induction records.	С	Refer to Section 4.1 Environmental Induction. The Company's database induction records show that in the reporting period a total of 106 people (consisting of 31 employees and 75 contractors and visitors) successfully completed the Environmental and Community Relations Induction. The Environment and Community Relations Induction contains information on feral animals: No pets are allowed No feeding of animals Keeping work sites clean of food scrap Feral animals present at MRP Details on company feral animal control programs Reporting and registering feral animal sightings
Sandhill Dunnart			
Install camera traps, in accordance with the camera trapping protocol, and the SDCP within the MRP and regionally within the Yellow Sand Plain.	Camera traps will be active continuously once installed and the information recorded will be downloaded with a frequency determined by storage capacity and battery life and likely to be at least every 3 months.	С	Subsequent to the TFMMP being approved in February 2020, the SDCP was developed in consultation with the DBCA and was submitted on the 10 November 2022 and approved by the DCCEEW on the 31 January 2023. The SDCP is required under Condition 2 of the EPBC 2013/7083



Management Action	Monitoring Requirement	Status*	Comments
	Annual audit of camera trapping investigations and comparison with the approved camera trapping protocol.		approval, to reduce the impact to the SHD posed by feral animals within a Defined Area. The SDCP details the monitoring methodology (camera trapping protocol), management and reporting requirements. Camera trapping is only required within the 6,000 ha Defined Area, and not regionally within the Yellow Sand Plain. The first stage of the SDCP was to gain an understanding/baseline of the presence of the SHD and feral animals. The two-year baseline study commenced in November 2021 and concluded in November 2023 (GHD, 2024). GHD's senior zoologist and Deep Yellow revised the SDCP using the baseline study data to propose the way forward in monitoring and management of SHD and feral animals, including thresholds and triggers that potentially induce management actions represented within the SDCP. The SDCP Revision 6 (Deep Yellow, 2024) was issued to the DCCEEW on 29 January 2024 for their review and was approved 19 July 2024 (Appendix 3). Camera data is downloaded every 3 months and provided to a qualified expert, Glen Gaikhorst, GHD's principal zoologist, for processing, and establishing the presence of the SHD and feral animals. GHD's report for the period November 2023 to May 2024 (GHD, 2025) is included in Appendix 4.
Monitor the camera traps for at least 60 days to confirm the presence/absence of SHD.	Camera traps will be active continuously once installed and the information recorded will be downloaded with a frequency determined by storage capacity and battery life and likely to be at least every 3 months. Quarterly review of camera trapping results to determine performance and identify if new locations should be established.	С	Monitoring confirms (GHD, 2024 and GHD, 2025) that there is a good representative population of SHD persisting within the Defined Area. There is no requirement for new monitoring locations.
Implement the camera trapping protocol within	Camera traps will be active continuously once installed and the information	С	A summary of the GHD (2025) report for the period November 2023 to May



recorded will be downloaded with a frequency determined by storage capacity and battery life and likely to be at least every 3 months.		2024 (Appendix 4) is included in Section 4.8.4 SHD Monitoring and
Annual review of the camera trapping results to determine performance and confirm that the management target and environmental objective is being met.		Results. The SDCP details the monitoring methodology (camera trapping protocol), management and reporting requirements. Camera trapping is only required within the 6,000 ha Defined Area, and not regionally. The Defined Area will be managed for the life of the EPBC Approval (until 2041), upon closure of the MRP and licence relinquishment sign-off by the relevant regulator.
Each time information is downloaded from cameras (likely to be every 3 months or more frequently), it will be reviewed (as soon as practicable) to determine whether Sandhill Dunnarts were present. Annual audit of Sandhill Dunnart Register.	С	GHD have completed a two year baseline report for the period November 2021 to November 2023 (GHD, 2024). A summary of the GHD (2025) report for the period November 2023 to May 2024 (Appendix 4) is included in Section 4.8.4 Monitoring Results. SHD are present with a population persisting within the Defined Area.
Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training on matter related to the SHD. Annual audit of induction records.	C	Refer to Section 4.1 Environmental Induction. The Company's database induction records show that in the reporting period a total of 106 people (consisting of 31 employees and 75 contractors and visitors) successfully completed the Environmental and Community Relations Induction. The Environment and Community Relations Induction contains information on the SHD: • Endangered status under the EPBC Act and <i>Biodiversity Conservation Act 2016</i> (WA) • Description for identification • Habitat and minimising its clearance • Threats to the SHD • SDCP and Defined Area
	Each time information is downloaded from cameras (likely to be every 3 months or more frequently), it will be reviewed (as soon as practicable) to determine whether Sandhill Dunnarts were present. Annual audit of Sandhill Dunnart Register. Monitoring of whether environmental inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training on matter related to the SHD. Annual audit of induction records.	Each time information is downloaded from cameras (likely to be every 3 months or more frequently), it will be reviewed (as soon as practicable) to determine whether Sandhill Dunnarts were present. Annual audit of Sandhill Dunnart Register. C inductions have taken place will be affected through induction records that will be created each time new personnel are inducted. That monitoring process will include inductees confirming that they have received relevant training on matter related to the SHD.

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage





Figure 34: Progressive Backfill of the Sample Disposal Pit

4.8.3 Current Monitoring Program

4.8.3.1 Sandhill Dunnart Conservation Plan Monitoring Requirements

The SDCP provides the requirements for SHD and feral monitoring and management. The SDCP is required under Condition 2 of the EPBC 2013/7083 approval, to reduce the impact to the SHD posed by feral animals within the Defined Area. The SDCP is based around a 6,000 ha Defined Area of land which contains suitable SHD habitat (Figure 35).

The first stage of the SDCP was to gain an understanding/baseline of the presence of the SHD and feral animals. The two-year baseline study commenced in November 2021 and concluded in November 2023 (GHD, 2024).

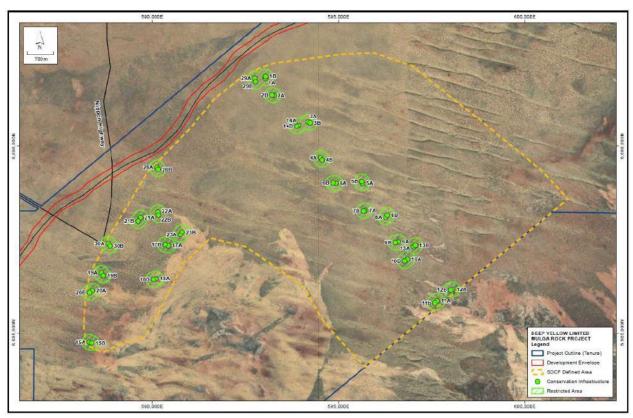


Figure 35: Camera Trapping Locations in the Defined Area



4.8.4 Monitoring Results

4.8.4.1 SHD and Feral Animals

A feral animal control program is not required within the Defined Area based on the monitoring results of the presence of SHD and feral animals from November 2023 to May 2024. The data was provided in the GHD (2025) letter report (Appendix 4) and is summarised below:

November 2023 to May 2024 (GHD, 2025):

From the images analysed from the Mulga Rocks project between November 2023 and early May 2024, (a period of approximately 180 days), the Sandhill Dunnart (Sminthopsis psammophila) was identified on 47 remote camera devices across 24 sites providing 486 discreet events. Only one site (Site 4) did not record Sandhill Dunnart during this period, which is consistent with all previous assessments. This infers based on raw data (Figure 36) there continues to be a good representative population of Sandhill Dunnart persisting within the Defined Area.

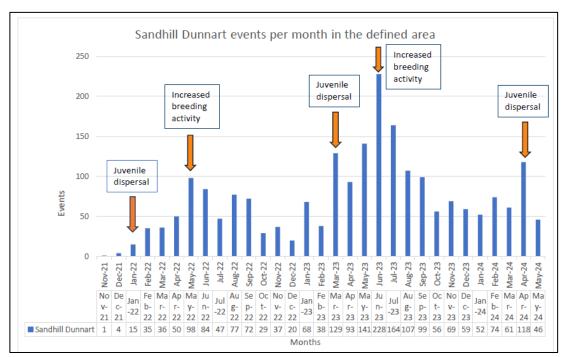


Figure 36: SHD Raw Data Events Per Month Demonstrating Key Activity Periods

Sandhill Dunnart (Sminthopsis psammophila) discreet events decreased this period from those previous however from the two-year analysis of data (GHD, 2024) the November to January period is typically the least active for the species (see Figure 36). This is due to the period not being breeding and falls prior to the dispersal of young and therefore not having increased activity over this period. Young dispersal was observed during the month of April 2024 (Figure 36).

Predatory feral species, consisting of a cat (Felis catus) and a red fox (Vulpes vulpes) recorded on 10 devices across 10 sites providing 12 discreet events. 1 discreet event was observed, consisting of a camel (Camelus dromedarius). All these events were singular inferring the presence of invasive predatory species is low within the Defined Area as has been observed in previous survey periods recorded.



It was observed that between November 23 and early May 24 there was a decrease in discreet events of red fox (Vulpes vulpes) throughout the defined area. Discreet events for cat's (Felis catus) saw no major increases within the Defined Area.

The Sandhill Dunnart Conservation Plan states an increase in feral animals within the Defined Area must record three consecutive departures (standard deviation) of species numbers above the estimated baseline level. Given the low number of feral species recorded over the two-year baseline monitoring period, statistical analysis was not undertaken (GHD 2024).

Between November 2023 and early May 2024, it can be concluded that no significant reduction was observed within the Sandhill Dunnart population from the baseline parameters (GHD 2024). It was also observed that feral animal discreet events decreased further from the two-year baseline (GHD 2024) where a statistical analysis couldn't be undertaken due to the low number of feral species recorded.

It can be determined that no feral animal control program is required within the Defined Area based on the data collected between November 2023 and early May 2024.

GHD will provide a report that is inclusive of all data up to the end of 2024 in Q2 2025, once issues with downloading camera data have been resolved.

4.9 Aboriginal Heritage

There are two registered Aboriginal heritage sites within the Development Envelope, DAA1985 (MINIGWAL2) and DAA1986 (MINIGWAL3). Both are described on the Department of Planning, Lands and Heritage's (**DPLH**) Aboriginal Cultural Heritage Inquiry System as artefact/scatter sites and, as such, are archaeological sites (containing physical evidence of past activity). No registered ethnographic sites are located in the area.

Aboriginal Heritage is managed using the Aboriginal Heritage Management Plan (EHS-EMP-003) (AHMP).

4.9.1 Objective and Management Targets

The objective of the AHMP is to ensure that historical and cultural associations and natural heritage are not adversely affected, by minimising impacts as far as practicable to sites registered with the DPLH namely sites DAA1985 and DAA1986 and any other cultural or heritage sites.

The key management target is for no unauthorised disturbance to DAA 1985 and DAA 1986 and any other cultural or heritage sites.

4.9.2 Monitoring Requirements

Table 15 shows the status of compliance with the AHMP required to achieve the management targets for the Project.



Table 15: Aboriginal Heritage Management Actions and Monitoring Status

Management Action	Monitoring Requirement	Status*	Comments
Implement GDAP system to prevent unauthorised	Annual audit of authorised versus actual cleared areas.	С	During the reporting period the Company's GIS continued to be improved (refer to Section 4.2.2).
clearing / disturbance.			The GIS provides reconciled and updated information with high resolution drone photos and the GDAP disturbance areas.
			Revision of the GDAP Form (MRO-ENV-FM-007) was completed during the reporting period with the inclusion of more Aboriginal heritage assessment requirements.
			There was no GDAP approved or any clearing / disturbance near known Aboriginal heritage sites.
No unauthorised access to DAA 1985 and DAA 1986 and unregistered sites.	Annual audit of Heritage Site Access Register.	С	A register is in-place – Mulga Rock Heritage & Environment Register (MRO-ENV-RG-001) – Aboriginal Registered Heritage Sites Authorised Entry Register. The information required on the register is:
			Register entry date
			Name of person(s) requesting entry
			Registered site ID/name
			 Requesting person's reason for entry
			Date of requested entry
			Time of entry
			Time of exit
			Senior Site Executives name
			Senior Site Executive's decision for validity of reason for entry (Permitted / Not Permitted)
			 Comment / action taken. There are no entries on the register.
Any unauthorised disturbance of DAA 1985 and DAA 1986 and unregistered sites must be	Annual audit of Environmental Incident Records	С	Incident records were reviewed, and no Aboriginal heritage related incidents occurred during the reporting period.



Management Action	Monitoring Requirement	Status*	Comments
reported immediately as an environmental incident.			
All new site personnel will undertake an environmental induction, emphasising the importance of Aboriginal heritage in the MRUP region and showing locations of known heritage sites to be avoided.	Annual audit of training records.	C	Refer to Section 4.1 Environmental Induction. The Company's database induction records show a total of 106 people (consisting of 31 employees and 75 contractors and visitors) have completed the Environment and Community Relations Induction (MRO-ENV-PP-008) and its assessment. Aboriginal heritage requirements are contained within the Environment and Community Relations Induction (MRO-ENV-PP-008): MRP personnel are not permitted to enter registered Aboriginal sites. Showing locations of known heritage sites is to be avoided. Any access to a registered Aboriginal Site must have a valid reason for entry (special circumstance) and permission prior to entry after completing the "Aboriginal Registered Heritage Sites Authorised Entry" (MRO-ENV-RG-001). If required, you will be notified of any sites near your work area by a Deep Yellow manager. Immediately stop any work that may disturb the area and notify your supervisor or Deep Yellow manager if you find any suspected artifacts or sites in the field. Do not disturb sites or collect, move or destroy artifacts.
All personnel involved in clearing and ground disturbance activities will undertake training on the GDAP process and management actions to take if unauthorised disturbance occurs	Annual audit of training records.	С	Refer to Section 4.1 Environmental Induction which states the number of personnel inducted. The induction includes information on the GDAP process and Aboriginal heritage: Immediately stop any work that may disturb the area and notify your supervisor or Deep Yellow manager if you find any suspected artifacts or sites in the field.



Management Action	Monitoring Requirement	Status*	Comments
or when unknown			 Do not disturb sites or collect,
sites are			move or destroy artifacts.
encountered			The induction includes assessment questions to confirm personnel understand the content of the training.

^{*} Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage

4.10 Tailings

As discussed in Section 1 Introduction, the CEMPs for the TSFs have not been implemented as there is currently no processing facilities on-site. The two TSF CEMPs are:

- Tailings Storage Facility Monitoring and Management Plan (Outcome-based CEMP) (EMP-EHS-008); and
- Above Ground Tailings Storage Facility Monitoring and Management Plan (Outcomebased CEMP) (EMP-EHS-009).

This section will be expanded when the processing facility and TSFs are constructed and operational.

4.11 Waste Management

Waste disposal at a new on-site waste landfill facility (Figure 37) commenced during the reporting period. The facility was constructed in accordance with Works Approval W6678/2022/1 for a Class II putrescible landfill. On the 19 August 2024 the Class II putrescible landfill was included as a registered premises on DWER's register (R2560/2024/1) under regulation 5B of the Environmental Protection Regulations 1987 (EP Regulations).

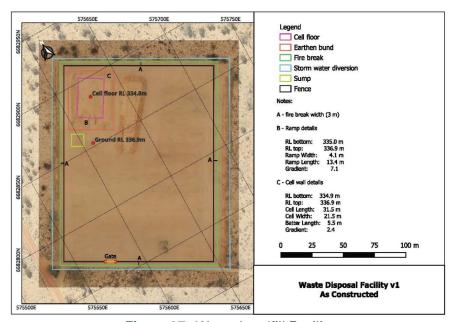


Figure 37: Waste Landfill Facility



The approximate volumes and type of waste buried at the landfill during the reporting period are recorded on the site's Waste Disposal Register. From the registers 36 entries an estimated 17 m³ of waste has been delivered to the landfill. The estimated volume is approximated to equate to a total of 2.1 t, which is well within the DWER Works Approval (W6678/2022/1) approved limit of 650 t/year.

Recycling bins are located at the camp and workshops, and the recyclable materials are taken to Kalgoorlie for processing. Controlled waste such as sewage from site septics is removed by a licensed transporter and disposed of at the appropriate licenced facilities, in accordance with the Environmental Protection (Controlled Waste) Regulations 2004. All controlled waste types and volume are tracked by the licenced transporter completing the DWER's Controlled Waste Tracking Form.

4.12 Environmental Incidents

There were no environmental incidents or non-compliances that required statutory reporting during the reporting period.

4.13 Inspections and Audits

4.13.1 Internal

Inspections completed on-site during the reporting period related to environmental management include:

- Workplace Inspection Checklist Mining (MRO-WHS-CH-012);
- Workplace Inspection Checklist Rubbish Tip (MRO-WHS-CH-018);
- Weed Hygiene and Radiation Clearance Form (DYL-ENV-FM-025);
- Drill Rig Pre-commencement Safety Inspection (DYL-WHS-FM-027);
- Camp Inspection (MRO-WHS-CH-006);
- WIC Containers Workshop (MRO-WHS-CH-007); and
- WIC Laydown Area (MRO-WHS-CH-010).

An internal audit of legal obligations and commitments was undertaken utilising the Legal Obligations and Commitment Register (MRO-ENV-RG-003).

4.13.2 Third Party

The DWER conducted an audit on the Company's compliance with the implementation conditions and commitments of MS 1046, and also with the Flora and Vegetation Management and Monitoring Plan (EMP-EHS-001) (FVMMP), the Terrestrial Fauna Management and Monitoring Plan (EMP-EHS-002) (TFMMP) and the Aboriginal Heritage Management Plan (EHS-EMP-003) (AHMP). The Compliance Audit Report from DWER, received on 16 September 2024 (DWER, 2024), found that an acceptable level of compliance had been demonstrated. Table 16 provides a summary of the environmental compliance status that demonstrates that there were no non-compliances and potentially non-compliances.



Table 16: Summary of DWER Environmental Compliance Audit

Compliance Status	MS1046	FVMMP	TFMMP	АНМР	Total
Compliant	41	5	7	2	55
Completed	11	0	0	0	11
Not Required	7	1	0	0	8
Potentially non-compliant	0	0	0	0	0
Non-compliant	0	0	0	0	0
In Process	0	0	0	0	0
Verification Required	0	0	0	0	0
Total	59	6	7	2	74

Source: DWER (2024)

5 Raw Data

Data from the Sandhill Dunnart and feral species image analysis is presented in the GHD report included in Appendix 4.

6 Proposed Changes

The FVMMP requirement is to monitor existing permanent vegetation plots to identify any increase in number of weeds within the MRUP. In 2024 this monitoring was extended beyond this requirement to include higher risk areas such as operation areas, and also the vegetation health monitoring points established in August 2024 (Mattiske, 2024a and Mattiske, 2024b).

7 Abbreviations and Units of Measure

Abbreviations and Acronyr	ns
ACR	Annual Compliance Report
AER	Annual Environmental Report
AHMP	Aboriginal Heritage Management Plan
AMD	Acid and metalliferous drainage
BAM Act	Biosecurity and Agriculture Management Act 2007 (WA)
CAR	Compliance Assessment Report
CEMP	Condition Environmental Management Plan
CSFS	Conservation significant flora species
Cth	Commonwealth
DAWE	Department of Agriculture, Water and Environment (Cth) (now DCCEEW)
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Cth)
Deep Yellow or Company	Deep Yellow Limited
DEMIRS	Department of Energy, Mines, Industry Regulation and Safety (WA) (previously DMIRS)



Abbreviations and Acronyn	ns
DMIRS	Department of Mines, Industry Regulation and Safety (WA) (now DEMIRS)
DWER	Department of Water and Environmental Regulation (WA)
EC	Electrical Conductivity or Electroconductivity
EPA	Environmental Protection Authority
EP Act	Environmental Protection Act 1986 (WA)
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
ERP	Emergency Response Procedure
FVMMP	Flora and Vegetation Monitoring and Management Plan
GDAP	Ground Disturbance Activity Permit
GIS	Geographic Information System
GIT	Geotechnical Investigation Trench
MRF	Mine Rehabilitation Fund
MRP or Project	Mulga Rock Project
MS 1046	Ministerial Statement No. 1046
Narnoo	Narnoo Mining Pty Ltd
OL	Overburden landform
PAF	Potential acid forming
PER	Public Environmental Review
SDCP	Sandhill Dunnart Conservation Plan
SDP	Sample Disposal Pit
SHD	Sandhill Dunnart
SMMP	Soil Monitoring and Management Plan
TFMMP	Terrestrial Fauna Monitoring and Management Plan
TSF	Tailings storage facility
Vimy	Vimy Resources Pty Ltd
WA	Western Australia

Chemical Symbols			
Со	Cobalt		
Cu	Copper		
Mn	Manganese		
Ni	Nickel		
U	Uranium		
Zn	Zinc		



Units of Measure

These units of measure may be grouped broadly as prefixes and measurements. A prefix applies to the unit of measurement that immediately follows it-for example, milligram is abbreviated as mg. Superscripts ² and ³ following a linear unit indicate area and volume respectively-for example, m² (square metres) and m³ (cubic metres). Different units are combined by a solidus (/) to indicate 'per'. For example, grams per tonne is abbreviated g/t.

<u>Prefixes</u>	
G	Giga (1,000,000,000)
М	Mega or Million (1,000,000)
k	Kilo (1,000)
С	Centi (0.01)
m	Milli (0.001)
μ	Micro (0.000001)
<u>Units</u>	
а	annum
ha	hectare
hr	hour
L	litre
lb	pound
m	metre
mbtoc	Metres below top of casing
mRL	metres Relative Level
mS	milliSiemens
t	tonne

8 References

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- Environmental Protection Authority. 2016. Environmental Factor Guideline: Flora and Vegetation.
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- Mattiske. 2015. Long-term Monitoring Plot Establishment and Assessment for the Mulga Rock Uranium Project, Great Victoria Desert, WA. Prepared for Vimy Resources Limited. Mattiske Consulting Pty Ltd. November 2015.
- MineGeoTech. 2023. Mulga Rock GIT Inspection 2023. Prepared for Narnoo Resources Pty Ltd (Deep Yellow Limited). MineGeoTech Pty Ltd. Perth, WA.
- OEPA. 2012. Post Assessment Guideline for Preparing a Compliance Assessment Report, Post Assessment Guideline No. 3. Office of the Environmental Protection Authority (OEPA), August 2012.
- OEPA. 2012a. Post Assessment Guideline for Making Information Publicly Available, Post Assessment Guideline No. 4. Office of the Environmental Protection Authority, Perth, August 2012.
- Vimy. 2015. Mulga Rock Uranium Project Public Environmental Review. Vimy Resources Limited. West Perth, WA. December 2015.

Mulga Rock Project

Reporting Period: 16 December 2023 to 15 December 2024



Appendix 1 – Statement of Compliance

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	Mulga Rock Uranium Project
Statement Number	1046
Proponent Name	Vimy Resources Pty Ltd
Proponent's Australian Company Number (where relevant)	ACN: 120 178 949

2. Statement of Compliance Details

Reporting Period	16/12/23 to 15/12/24
------------------	----------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	✓	Construction	>	Operation		Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
Attached to CAR as Appendix 2	

Were all implementation conditions and within the reporting period? (please tick	nd/or procedures of the Statement complied w ✓ the appropriate box)	vith
No (please proceed to Section 3)	Yes (please proceed to Section 4)	✓

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?						
N/A						
Was the implementation condition or procedure non-compliant or potentially no	n-compliant?					
N/A						
On what date(s) did the non-compliance or potential non-compliance occur (if a	applicable)?					
N/A						
Was this non-compliance or potential non-compliance reported to the Chief Exe	ecutive Officer,					
☐ Yes ☐ Reported to DWER verbally Date ☐ Reported to DWER in writing Date	□ No					
What are the details of the non-compliance or potential non-compliance and wheextent of and impacts associated with the non-compliance or potential non-compliance.						
N/A						
What is the precise location where the non-compliance or potential non-compliance applicable)? (please provide this information as a map or GIS co-ordinates)	ance occurred (if					
N/A						
What was the cause(s) of the non-compliance or potential non-compliance?						
N/A						
What remedial and/or corrective action(s), if any, were taken or are proposed to response to the non-compliance or potential non-compliance?	b be taken in					
N/A						
What measures, if any, were in place to prevent the non-compliance or potential before it occurred? What, if any, amendments have been made to those measurecurrence?						
N/A						
Please provide information/documentation collected and recorded in relation to	this implementation					
condition or procedure:						
 in the reporting period addressed in this Statement of Compliance; and 						
 as outlined in the approved Compliance Assessment Plan for the Stater this Statement of Compliance. 						
(the above information may be provided as an attachment to this Statement of	Compliance)					

For additional non-compliance or potential non-compliance, please duplicate this page as required.

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS: Om Reference

4. Proponent Declaration

I, Catherine Mary Paxton, Head of Environment and Sus	stainability declare that I am authorised on
behalf ofVimy Resources Pty Ltd	
(being the person responsible for the proposal) to submi	t this form and that the information
contained in this form is true and not misleading.	
Signature: Om Pooto	Date:14/03/2025

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection*Act 1986 to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10

Joondalup DC WA 6919

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

Post assessment documents can be found at www.epa.wa.gov.au

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS: On Page 1

ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	С	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	 This term applies to audit elements with: ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	 This term may only be used where: audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	The term 'In Process' may not be used for any purpose other than that stated in the Definition Column. The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS: On Pada

Mulga Rock Project

Reporting Period: 16 December 2023 to 15 December 2024



Appendix 2 – MRP Audit Table



AUDIT TABLE

Statement Compliance Section
PROJECT: Mulga Rock Uranium Project
Statement 1046

Note:

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Acronyms list: CEO = Chief Executive Officer of OEPA; DWER = Department of Water and Environment Regulation; DBCA = Department of Biodiversity, Conservation and Attractions; DAA = Department of Aboriginal Affairs; DMIRS = Department of Mining, Industry regulation and Safety; EPA = Environmental Protection Authority; DoH = Department of Water, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information								
1046:M1.1	Proposal Implementation	When implementing the Proposal, the proponent shall not exceed the authorised extent of the Proposal as defined in Table 2 in Schedule 1, unless amendments to the Proposal and the authorised extent of the Proposal have been approved under the EP Act.	Open cut mine pits A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 2,374 ha within the 9,998 ha Development Envelope is cleared.	Ground disturbance data will be reported to DMIRS (Annual Environmental Report – AER) and DWER (Compliance Assessment Report – CAR) annually.	awarene any pote non-	Overall	Overall	Overall	Overall	Overall	Overall	Overall	awareness of any potential	awareness of any potential non-	С	178.6 ha disturbance to date (reconciled after spatial data entry into the site's GIS, previously reported as 193 ha, calculation now excludes historical disturbance that proceeds MS1046 approval). The total disturbance does not exceed 2,374 ha within the 9,998 ha Development Envelope. Disturbance tracked and recorded via GDAP process and site's GIS.
			Associated infrastructure A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 1,307 ha within the 9,998 ha Development Envelope is cleared.	Ground disturbance data will be reported to DMIRS (AER) and DWER (CAR) annually.			С	130.4 ha of disturbance to date (reconciled after spatial data entry into the site's GIS, previously reported as 357 ha, calculation now excludes historical disturbance that proceeds MS1046 approval, with the majority being historical exploration). The total does not exceed 1,307ha within the 9,998ha Development Envelope. Disturbance tracked and recorded via GDAP process and site's GIS.								
	Confirmation of backfilling to at least 10 m above the water table will be achieved by survey. Above-ground TSF A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 106 ha within the 9,998 ha Development Envelope is cleared. Tailings disposal Disposal flow rates will be measured to ensure no more than 3 Mtpa of beneficiation rejects and no more than 2 Mtpa of post-leaching tailings materials are discharged. Water abstraction Groundwater abstraction flow rates will be		Confirmation of backfilling to at least 10 m above the water table will be achieved by	Survey data will be submitted annually to DMIRS (AER) and DWER (CAR).		NR	Not required at this stage of the project. Refer to Section 2 Project Implementation Status.									
			A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 106 ha within the	A Ground Disturbance Activity Permit (GDAP) will be required prior to all ground disturbance to ensure that no more than 106 ha within the		NR	Not required at this stage of the project. Refer to Section 2 Project Implementation Status.									
			Disposal flow rates will be measured to ensure no more than 3 Mtpa of beneficiation rejects and no more than 2 Mtpa of post-leaching tailings	Disposal flow rates of beneficiation rejects, and post- leaching tailings, will be reported to DMIRS (AER) and DWER (CAR).			NR	Not required at this stage of the project. Refer to Section 2 Project Implementation Status.								
		Groundwater abstraction flow rates will be reported to DMIRS (AER) and DWER (CAR).		NR	Not required at this stage of the project. Refer to Section 2 Project Implementation Status.											

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AUDIT TABLE

Statement Compliance Section PROJECT: Mulga Rock Uranium Project Statement 1046

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
			Mine dewatering Mine pit dewatering flow rates or pit water utilization rates will be measured to ensure no more than 2.5 GL/a are extracted.	Mine pit dewatering flow rates will be reported to DMIRS (AER) and DWER (CAR).			NR	Not required at this stage of the project. Refer to Section 2 Project Implementation Status.
			Water reinjection Reinjection flow rates will be measured to ensure no more than 1.5 GL/a are reinjected into the reinjection borefield.	Water reinjection flow rates will be reported to DMIRS (AER) and DWER (CAR).			NR	Not required at this stage of the project.
1046:M2.1	Contact Details	The proponent shall notify the CEO of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO in writing of any changes.	Copy of written correspondence.	Overall	Within 28 days of change.	С	During the reporting period there was no changes to Vimy Resources Pty Ltd (ABN 56 120 178 949) and remains a wholly owned subsidiary of Deep Yellow Limited (ABN 97 006 391 948). The physical address remains as Level 1, 502 Hay Street, Subiaco, WA 6008 and postal address is PO Box 1770, Subiaco, WA 6904.
1046:M3.1	Time Limit for Proposal Implementation	The proponent shall not commence implementation of the Proposal after five (5) years from the date on this Statement, and any commencement, prior to this date, must be substantial.	No commencement of the project after 5 years from 16 December 2016.	Absence of written correspondence informing the CEO that we have commenced substantial implementation.	Construction	After 5 years from the date of this Statement.	CLD	Correspondence from Vimy dated 25 November 2021, provided DWER notification of substantial commencement. An ASX announcement on 13 December 2021 provided an update on the Mulga Rock Uranium Project. Additional information to provide evidence of substantial commencement was provided to DWER on 15 December 2021. DWER acknowledged substantial commencement of the project on 16 December 2021.
1046:M3.2	Time Limit for Proposal Implementation	Any commencement of implementation of the Proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Provide written evidence of substantial implementation of the project to the CEO within 5 years of issue of the statement (16 December 2016).	Written correspondence to CEO containing copies of the Mining Proposal or Works Approval that the substantial work is being performed under and evidence in the form of photographs and an approved GDAP indicating that the work is substantial.	Construction	On or before 5 years from the date of this Statement	CLD	Correspondence from Vimy dated 25 November 2021, provided DWER notification of substantial commencement. An ASX announcement on 13 December 2021 provided an update on the Mulga Rock Uranium Project. Additional information to provide evidence of substantial commencement was provided to DWER on 15 December 2021. DWER acknowledged substantial commencement of the project on 16 December 2021.
1046:M4.1	Compliance Reporting	The proponent shall prepare, submit and maintain a Compliance Assessment Plan to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to implementation, whichever is sooner.	A Compliance Assessment Plan (CAP) will be submitted at least 6 months prior (September 2017) to the first CAR. Prepare the CAP in accordance with the "Post-Assessment Guideline for Preparing a Compliance Assessment Plan".	Copy of written correspondence CAP.	Pre- construction	6 months prior to the first CAR.	CLD	The CAP was submitted to DWER on the 18 September 2017. DWER provided correspondence 2 October 2017 that advised they had reviewed the CAP and determined that the CAP meets the requirements of Conditions 4-1 and 4-2 of Ministerial Statement 1046. A revised CAP (Revision 2) was included as an appendix to the 16 December 2022 to 15 December 2023 CAR.

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AUDIT TABLE

Statement Compliance Section PROJECT: Mulga Rock Uranium Project Statement 1046

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate the: (1) frequency of compliance reporting; (2) approach and timing of compliance assessments; (3) retention of compliance assessments; (4) method of reporting of potential non-compliances and corrective actions taken; (5) table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	The CAP will serve as a plan for writing and submitting the CAR.	CAP	Overall	6 months prior to the first CAR.	CLD	The CAP was submitted to DWER on the 18 September 2017. DWER provided correspondence 2 October 2017 that advised they had reviewed the CAP and determined that the CAP meets the requirements of Conditions 4-1 and 4-2 of Ministerial Statement 1046. The CAP has been used as guide for preparing and submitting the CAR. A revised CAP (Revision 2) was included as an appendix to the 16 December 2022 to 15 December 2023 CAR.
1046:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2 the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Implement the CAP.	Copy of written correspondence from CEO.	Overall	Upon receival of notice in writing from the CEO that the CAP satisfies requirements.	C	The CAP was submitted to DWER on the 18 September 2017. DWER provided correspondence 2 October 2017 that advised they had reviewed the CAP and determined that the CAP meets the requirements of Conditions 4-1 and 4-2 of Ministerial Statement 1046. Assessment and reporting of compliance to conditions is done in accordance with the CAP. A revised CAP (Revision 2) was included as an appendix to the 16 December 2022 to 15 December 2023 CAR.
1046:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Do not dispose of any records of compliance assessments until advice is given by the CEO.	Copies of all reports will be retained digitally.	Overall	For the life of the project.	С	The CAP, CARs and there Audit Tables are all retained on Deep Yellow's electronic filing system, which is hosted on the cloud and backed up regularly. The CARs are also available on Deep Yellow's website: https://deepyellow.com.au/projects/australia/mulga-rock-project/approvals-and-compliance/
1046:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Report all potential non-compliance to the CEO.	Copy of written correspondence to the CEO.	Overall	Within 7 days of awareness of any non-compliance.	NR	There was no potential non-compliance during the reporting period, therefore no notifications to the CEO of DWER.
1046:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;	Prepare and submit the CAR, in accordance with the approved CAP.	CAR	Overall	15 months from the date of issue of the Statement and then annually from the date of submission of the first CAR.	C	The MS1046 was issued on 16 December 2016, therefore, the first CAR was provided (in accordance with Condition 4-6) 15 months from that date of issue on the 16 March 2018. As stated in the CAP, the CARs are for the 12 month period from 16 December to 15 December, with submission required by 16 March. This is the eighth CAR submitted and covers the reporting period from 16 December 2023 to 15 December 2024.

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Statement Compliance Section PROJECT: Mulga Rock Uranium Project Statement 1046

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		 (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1. 						All CARs have been made publicly available on Deep Yellow's website: https://deepyellow.com.au/projects/australia /mulga-rock-project/approvals-and- compliance/ A revised CAP (Revision 2) was included as an appendix to the 16 December 2022 to 15 December 2023 CAR.
1046:M5.1	Public Availability of Data, Plans, Programs and Surveys	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the Proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data and derived information products (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)) relevant to the assessment of this proposal and implementation of this Statement.	When required by the CEO and in accordance with the State Records Act 2000, Electronic Transactions Act 2011 and Freedom of Information Act 1992.	Copies of environmental data and derived information products.	Overall	Within a reasonable time period approved by the CEO.	NR	There have been no requests by the CEO of DWER for data, plans programs and surveys to be made publicly available during the reporting period. All CARs have been made publicly available on Deep Yellow's website: https://deepyellow.com.au/projects/australia/mulga-rock-project/approvals-and-compliance/
1046:M5.2	Public Availability of Data, Plans, Programs and Surveys	If any data referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make these data publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	In accordance with the State Records Act 2000, Electronic Transactions Act 2011 and Freedom of Information Act 1992.	Written correspondence with the CEO.	Overall	When required and in accordance with record keeping legislation.	NR	There have been no requests by the CEO of DWER for data, plans programs and surveys during the reporting period. All CARs have been made publicly available on Deep Yellow's website: https://deepyellow.com.au/projects/australia/mulga-rock-project/approvals-and-compliance/
1046:M6.1	Outcome-based Condition Environmental Management Plan	The proponent shall prepare and submit Condition Environmental Management Plans: (1) Prior to substantial commencement of the proposal or as otherwise agreed in writing by the CEO, to demonstrate that the environmental outcomes in conditions 13-1, 15-1 and 16-1 will be met.	Prepare and submit Condition Environmental Management Plans in accordance with the "Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans" and ensure that they meet the environmental outcomes specified in conditions 13-1, 15-1 and 16-1.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre- construction	Prior to commencement of substantial works.	CLD	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. Condition Environmental Management Plans (CEMPs) have been prepared and submitted as per Statement No. 1046 conditions 13-1, 15-1 and 16-1. The CEMPs have been reviewed and approved by the EPA Services Division of DWER. Approval has been received in writing from the CEO.
1046:M6.2	Outcome-based Condition Environmental Management Plan	The Condition Environmental Management Plan(s) shall: (1) specify the environmental outcomes to be achieved, as specified in conditions 13-1, 15-1 and 16-1; (2) specify trigger criteria that will provide early warning for the implementation of trigger level actions if exceeded; (3) specify threshold criteria that:	Prepare and submit Condition Environmental Managements Plans containing information specified in condition 6-2 of Statement 1046.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre- construction	Prior to commencement of substantial works.	CLD	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. CEMPs have been reviewed and approved by the EPA Services Division of DWER prior to the commencement of substantial works. Approval has been received in writing from the CEO.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(a) provides a limit beyond which the environmental outcome identified in conditions 13-1, 15-1 and 16-1 is not achieved; and (b) will trigger the implementation of threshold contingency actions if exceeded. (4) specify monitoring to determine if trigger criteria and threshold criteria are exceeded;						This CAR (Section 1.5 Compliance Assessment Report Requirement) provides a list of CEMPs approved and their approval dates.
		 (5) specify trigger level actions to be implemented in the event that trigger criteria have been exceeded; (6) specify threshold contingency and remedial actions to be implemented in the event that threshold criteria 						
		are exceeded; (7) provide the format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that conditions 13-1, 15-1 and 16-1 have been met over the reporting period in the Compliance Assessment Report required by condition 4-6; and (8) provide for reporting of exceedances of the trigger						
1046:M6.3	Outcome-based Condition Environmental Management Plan	and threshold criteria. After receiving notice in writing from the CEO that the Condition Environmental Management Plans satisfy the requirements of condition 6-2 for conditions 13-1, 15-1 and 16-1, the proponent shall, prior to the commencement of ground disturbing activities: (1) commence implementation of the provisions of the Condition Environmental Management Plan(s); and (2) continue to implement the Condition Environmental Management Plan(s) until the CEO has confirmed by notice in writing that the proponent has demonstrated the outcomes specified in conditions 13-1, 15-1 and 16-1 have been met.	Implement the Condition Environmental Management Plans that satisfy condition 6-2 for conditions 13-1, 15-1 and 16-1.	Approval notice from the CEO. Performance against the Condition Environmental Management Plans will be reported in the annual Compliance Assessment Report (CAR).	Overall	Prior to commencement of substantial works and throughout the life of the project.	C	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. Outcome-based CEMPs have been submitted and approved by the EPA Services Division of DWER. Approval has been received in writing from the CEO. This CAR (Section 1.5 Compliance Assessment Report Requirement) provides a list of CEMPs approved and their approval dates. Provisions of the CEMPs were implemented prior to the commencement of substantial works.
1046:M6.4	Outcome-based Condition Environmental Management Plan	In the event that monitoring indicates exceedance of trigger criteria and/or threshold criteria specified in the Condition Environmental Management Plan(s), the proponent shall: (1) report the exceedance to the CEO in writing within seven (7) days of the exceedance being identified; (2) immediately implement the trigger level actions and/or threshold contingency actions specified in the Condition Environmental Management Plan(s) and continue implementation of those actions until the trigger criteria and/or threshold criteria are being met and implementation of the trigger level actions and/or threshold contingency actions are no longer required;	If monitoring indicates exceedance of either trigger and/or threshold criteria outlined in the Condition Environmental Management Plans, then the CEO will be notified in accordance with the requirements of condition 6-4.	Copy of correspondence to CEO advising of trigger and/or threshold exceedance(s).	Overall	Notify CEO within 7 days of the exceedance being identified. Immediately implement contingency actions. Provide a report to the CEO within 90 days of the exceedance being reported.	NR	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. Environmental monitoring associated with the relevant CEMPs have been implemented. There have been no exceedances of proposed trigger and/or threshold criteria specified in the CEMPs.



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		 (3) investigate to determine the cause of the trigger criteria and/or threshold criteria being exceeded; (4) identify additional measures required to prevent the 						
		trigger and/or threshold criteria being exceeded in the future;						
		(5) investigate to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; and						
		(6) provide a report to the CEO within ninety (90) days of the exceedance being reported.						
		The report shall include:						
		(a) details of trigger level actions or threshold contingency actions implemented;						
		(b) the effectiveness of the trigger level actions or threshold contingency actions implemented, monitored and measured against trigger criteria and threshold criteria;						
		(c) the findings of the investigations required by condition 6-4(3) and 6-4(5);						
		(d) additional measures to prevent the trigger or threshold criteria being exceeded in the future; and						
		(e) measures to prevent, control or abate the environmental harm which may have occurred.						
1046:M6.5	Outcome-based Condition Environmental Management Plan	The proponent: (1) may review and revise the Condition Environmental Management Plan(s), or (2) shall review and revise the Condition Environmental Management Plan(s) as and when directed by the	Review and revise Conditional Environmental Management Plans as required.	Written correspondence. Revised Condition Environmental Management Plans.	Overall	As required and/or as directed by CEO.	NR	CEMPs have been submitted and approved by the EPA Services Division of DWER. Approval has been received in writing from the CEO. This CAR (Section 1.5 Compliance Assessment Report Requirement) provides a
		CEO.						list of CEMPs approved and their approval dates. There has been no requirement to revise the CEMPs during the reporting period.
1046:M6.6	Outcome-based Condition Environmental Management Plan	The proponent shall implement the latest revision of the Condition Environmental Management Plan(s), which the CEO has confirmed by notice in writing, satisfies the requirements of condition 6-2.	Implement latest approved Condition Environmental Management Plans at all times.	Copy of approval letter from CEO.	Overall	Implement the current confirmed (by CEO) version of the Environmental Management Plans.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. There has been no requirement to revise the CEMPs during the reporting period. All relevant CEMPs were implemented at the commencement of substantial works.
1046:M7.1	Management- based Condition Environmental Management Plans	The proponent shall prepare and submit Condition Environmental Management Plans: (1) Prior to substantial commencement of the proposal or as otherwise agreed in writing by the CEO, to demonstrate that the environmental objectives in conditions 9-1, 10-1, 11-1, 12-1 and 14-1 will be met.	Prepare and submit Condition Environmental Management Plans in accordance with the "Instructions on how to prepare <i>Environmental Protection Act 1986</i> Part IV Environmental Management Plans" and ensure that they meet the environmental objectives specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre- construction	Prior to substantial commencement of work.	CLD	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. Management based CEMPs have been prepared and submitted as per Statement No. 1046 conditions 9-1, 10-1, 11-1, 12-1 and 14-1.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								The management-based CEMPs have been submitted and approved by the EPA Services Division of DWER. Approval has been received in writing from the CEO. This CAR (Section 1.5 Compliance Assessment Report Requirement) provides a list of CEMPs approved and their approval dates.
1046:M7.2	Management- based Condition Environmental Management Plans	The Condition Environmental Management Plan(s) shall: (1) specify the environmental objectives to be achieved, as specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1; (2) specify risk-based management actions that will be implemented to demonstrate compliance with the environmental objectives specified in 9-1, 10-1, 11-1, 12-1 and 14-1. Failure to implement one or more of the management actions represents non-compliance with these conditions; (3) specify measurable management target(s) to determine the effectiveness of the risk-based management actions; (4) specify monitoring to measure the effectiveness of management actions against management targets, including but not limited to, parameters to be measured, baseline data, monitoring locations, and frequency and timing of monitoring; (5) specify a process for revision of management actions and changes to proposal activities, in the event that the management targets are not achieved. The process shall include an investigation to determine the cause of the management target(s) being exceeded; (6) provide the format and timing to demonstrate that 9-1, 10-1, 11-1, 12-1 and 14-1 have been met for the reporting period in the Compliance Assessment Report required by condition 4-6 including, but not limited to: (a) verification of the implementation of management actions; and (b) reporting on the effectiveness of management actions against management target(s).	Prepare and submit Condition Environmental Managements Plans containing information specified in condition 7-2 of Statement 1046.	Condition Environmental Management Plans. Approval notice from the CEO.	Pre-construction	Prior to substantial commencement of work.	CLD	The CEMPs have been prepared, submitted and approved prior to the commencement of substantial works. Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The CEMPs have been prepared and submitted as per Statement No. 1046 conditions 9-1, 10-1, 11-1, 12-1 and 14-1, and contain information specified in condition 7-2.
1046:M7.3	Management- based Condition Environmental Management Plans	After receiving notice in writing from the CEO that the Condition Environmental Management Plan(s) satisfies the requirements of condition 7-2 for conditions 9-1, 10-1, 11-1, 12-1 and 14-1, the proponent shall: (1) implement the provisions of the Condition Environmental Management Plan(s); and (2) continue to implement the Condition Environmental Management Plan(s) until the CEO has confirmed by	Implement the Condition Environmental Management Plans that satisfy condition 7-2 for conditions 9-1, 10-1, 11-1, 12-1 and 14-1.	Approval notice from the CEO. Performance against the Condition Environmental Management Plans will be reported in the annual Compliance Assessment Report (CAR).	Overall	Prior to commencement of substantial works and throughout the life of the project.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The CEMPs have been submitted and approved by the EPA Services Division of DWER. Approval has been received in writing from the CEO. All relevant CEMPs have been

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		notice in writing that the proponent has demonstrated the objectives specified in conditions 9-1, 10-1, 11-1, 12-1 and 14-1 have been met.						implemented to satisfy condition 7-2 for conditions 9-1, 10-1, 11-1, 12-1 and 14-1. This CAR (Section 1.5 Compliance Assessment Report Requirement) provides a list of CEMPs approved and their approval dates.
1046:M7.4	Management- based Condition Environmental Management Plans	In the event that monitoring, tests, surveys or investigations indicate exceedance of management target(s) specified in the Condition Environmental Management Plan(s), the proponent shall: (1) report the exceedance in writing to the CEO within 21 days of the exceedance being identified; (2) investigate to determine the cause of the management targets being exceeded; (3) provide a report to the CEO within 90 days of the exceedance being reported as required by condition 7-4(1). The report shall include: (a) cause of management targets being exceeded; (b) the findings of the investigation required by conditions 7-4(2); (c) details of revised and/or additional management actions to be implemented to prevent exceedance of the management target(s); and (d) relevant changes to proposal activities.	If monitoring indicates exceedance of management target(s) outlined in the Condition Environmental Management Plans, then the CEO will be notified in accordance with the requirements of condition 7-4.	Copy of correspondence to CEO advising of target exceedance(s).	Overall	Notify CEO in writing within 21days of the exceedance being identified. Investigate cause of exceedance and provide a report to the CEO within 90 days of the exceedance being reported.	NR	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. Environmental monitoring, tests, surveys and investigations associated with the relevant CEMPs were implemented at the commencement of substantial works. There have been no exceedances of proposed trigger and/or threshold criteria specified in the CEMPs.
1046:M7.5	Management- based Condition Environmental Management Plans	In the event that monitoring, tests, surveys or investigations indicate that one or more management actions specified in the Condition Environmental Management Plan(s) have not been implemented, the proponent shall: (1) report the failure to implement management action/s in writing to the CEO within 7 days of identification; (2) investigate to determine the cause of the management action(s) not being implemented; (3) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to the failure to implement management actions; (4) provide a report to the CEO within 21 days of the reporting required by condition 7-5(1). The report shall include: (a) cause for failure to implement management actions; (b) the findings of the investigation required by conditions 7-5(2) and 7-5(3); (c) relevant changes to proposal activities; and	If monitoring indicates that management actions specified in the Condition Environmental Management Plans have not been implemented, then the CEO will be notified in accordance with the requirements of Condition 7-5.	Copy of correspondence to CEO advising of potential non-compliance. Copy of report investigating potential non-compliance.	Overall	Report failure to implement management actions in writing to CEO within 7 days of identification. Investigate cause. Provide a report to the CEO within 21 days of reporting the potential noncompliance.	NR	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. Management actions outlined in the CEMPs were implemented at the commencement of substantial works. There have been no exceedances of proposed trigger and/or threshold criteria specified in the CEMPs.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(d) measures to prevent, control or abate the environmental harm which may have occurred.						
1046:M7.6	Management- based Condition Environmental Management Plans	The proponent: (1) may review and revise the Condition Environmental Management Plan(s), or (2) shall review and revise the Condition Environmental Management Plan(s) as and when directed by the CEO.	Review and revise Conditional Environmental Management Plans as required.	Written correspondence. Revised Condition Environmental Management Plans.	Overall	As required or when directed by the CEO.	NR	The CEMPs were approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO. This CAR provides a list of CEMPs approved and their approval dates. There has been no requirement to revise the CEMPs during the reporting period. There have been no requests by the CEO of DWER to review and revise the CEMPs.
1046:M7.7	Management- based Condition Environmental Management Plans	The proponent shall implement the latest revision of the Condition Environmental Management Plan(s), which the CEO has confirmed by notice in writing, satisfies the requirements of condition 7-2.	Implement Condition Environmental Management Plans prior to the commencement of ground disturbing activities.	Written correspondence. Copy of approval letter from CEO.	Overall	When confirmation has been received in writing from the CEO.	С	The CEMPs were approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO. The relevant CEMPs were implemented prior to the commencement of ground disturbing activities.
1046:M8.1	Flora and Vegetation (Outcome based)	The proponent shall manage the implementation of the Proposal to meet the following environmental outcomes: (1) avoid direct impacts to Hakea sp. LAC139 and LAC140 including a 50 m buffer; (2) ensure that no more than 3,474 ha of vegetation community E3 and 200 ha of vegetation community S6 is cleared within the project development envelope as delineated in Figure 3 of Schedule 1 and defined by the geographic coordinates in Schedule 2; and (3) ensure the eradication of all weeds introduced in the development envelope as a result of the implementation of the proposal.	Implement the approved Flora and Vegetation Monitoring and Management Plan so that the environmental outcomes specified in condition 8-1 are met.	Compliance Assessment Report (CAR). Vegetation monitoring results. Ground disturbance areas on GIS database. Annual MRF report.	Overall	Once Proposal implementation commences. For the life of the project monitor in accordance with the Flora and Vegetation Monitoring and Management Plan.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The approved Flora and Vegetation Monitoring and Management Plan (FVMMP) was implemented at the commencement of proposal implementation. Monitoring results for the <i>Hakea</i> spp., E3 and S6 vegetation communities and weeds are presented in this CAR.
1046:M9.1	Flora and Vegetation (Objective based)	The proponent shall manage the implementation of the Proposal to meet the following environmental objectives: (1) minimise direct and indirect impacts as far as practicable on all conservation significant flora species; and (2) minimise direct and indirect impacts as far as practicable on the vegetation communities E3 and S6.	Implement the approved Flora and Vegetation Monitoring and Management Plan, so that the environmental objectives specified in condition 9-1 are met.	CAR Vegetation monitoring results. Ground disturbance areas on GIS database. DMIRS AER	Overall	Once Proposal implementation commences. For the life of the project monitor in accordance with the Flora and Vegetation Monitoring and Management Plan.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The approved FVMMP was implemented at the commencement of proposal implementation. Monitoring results for impacts on conservation significant flora species and E3 an S6 vegetation communities are presented in this CAR.
1046:M9.2	Flora and Vegetation (Objective based)	The proponent shall consult with Parks and Wildlife and prepare a Flora and Vegetation Monitoring and Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objective required by condition 9-1.	Consult with DBCA (formerly Parks and Wildlife) in the preparation of the Flora and Vegetation Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DBCA.	Pre- construction	Prior to submitting the Flora and Vegetation Monitoring and Management	CLD	The approved FVMMP was prepared in consultation with DBCA prior to submission to the CEO for approval.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
						Plan to the OEPA for approval.		
1046:M9.3	Flora and Vegetation (Objective based)	The Flora and Vegetation Monitoring and Management Plan required by condition 7-1 shall include provisions required by condition 7-2 to address impacts on conservation significant flora and vegetation health including from, but not limited to: direct clearing, dust, use of groundwater for dust suppression, fire regimes and weeds.	Amend the Flora and Vegetation Monitoring and Management Plan.	Written approval from the CEO that the Flora and Vegetation Monitoring Plan addresses the requirements of condition 7.2 Compliance Assessment Report. Flora and Vegetation Monitoring and Management Plan. Monitoring Schedule.	Pre- construction	Prior to submitting the Flora and Vegetation Monitoring and Management Plan to the OEPA for approval	CLD	The FVMMP was approved by the CEO of DEWR as specified in the CAR.
1046:M9.4	Flora and Vegetation (Objective based)	The proponent shall continue to implement the version of the Flora and Vegetation Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Flora and Vegetation Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 9-1.	Implement the approved version of the Flora and Vegetation Monitoring and Management Plan.	Written correspondence from CEO	Overall	Once Proposal implementation commences. Implement current version of the Flora and Vegetation Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. There has been no requirement to revise the FVMMP during the reporting period.
1046:M10.1	Terrestrial Fauna	The proponent shall manage the implementation of the Proposal to meet the following environmental objectives: (1) minimise direct and indirect impacts as far as practicable on conservation significant terrestrial fauna species; and (2) monitor the presence of the Sandhill Dunnart using methodology established in the Camera Trapping Program.	Implement the approved Terrestrial Fauna Monitoring and Management Plan, so that the environmental objectives specified in condition 10-1 are met.	CAR Terrestrial Fauna Monitoring and Management Plan. Sandhill Dunnart monitoring results. Ground disturbance areas on GIS database. Annual Sandhill Dunnart Report for DBCA.	Overall	Once Proposal implementation commences. For the life of the project.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Terrestrial Fauna Monitoring and Management Plan (TFMMP) was approved by the EPA Services Division of the DWER on 20 February 2020. The TFMMP was implemented at the commencement of proposal implementation. Monitoring results are presented in the CAR, and the Sandhill Dunnart Reports are also provided to the DBCA and DCCEEW.
1046:M10.2	Terrestrial Fauna	The proponent shall consult with Parks and Wildlife and prepare and submit a Terrestrial Fauna Monitoring and Management Plan (including a Camera Trapping Program) required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objective of condition 10-1.	Consult with DBCA (formerly Parks and Wildlife) in the preparation of the Terrestrial Fauna Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DBCA.	Pre- construction	Prior to the submission of the Terrestrial Fauna Monitoring and Management Plan to the CEO for approval.	CLD	The TFMMP was prepared in consultation with DBCA prior to submission to the CEO of DWER for approval.
1046:M10.3	Terrestrial Fauna	The Terrestrial Fauna Monitoring and Management Plan required by condition 7-1 shall include:	Implement the approved Terrestrial Fauna Monitoring and Management Plan.	CAR	Pre- construction	To be included in the Terrestrial	CLD	The TFMMP was approved by the EPA Services Division of the DWER on 20 February 2020.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		 (1) provisions required by condition 7-2 to manage potential impacts of the proposal on conservation significant fauna including from, but not limited to degradation of habitat from weeds, loss of habitat, feral animals, changes to fire regime, trenching for pipelines, and risk of vehicle strikes; and (2) the methodology of recording impacts to conservation significant fauna; and (3) the methodology of monitoring and registering the presence of the Sandhill Dunnart. 		Terrestrial Fauna Monitoring and Management Plan. Monitoring Schedule. Sandhill Dunnart Conservation Management Plan.		Fauna Monitoring and Management Plan.		The TFMMP was implemented at the commencement of proposal implementation.
1046:M10.4	Terrestrial Fauna	The proponent shall provide the results of the Sandhill Dunnart register and the record of impacts to conservation significant fauna annually to Parks and Wildlife.	Provide Sandhill Dunnart monitoring results to DBCA.	Copy of the Sandhill Dunnart register and associated correspondence.	Overall	Once Proposal implementation commences. Annually.	С	A Sandhill Dunnart Conservation Plan (SDCP) was developed in consultation with the Department of Biodiversity, Conservation and Attractions (DBCA) and was submitted on the 10 November 2022 and approved by the DCCEEW on the 31 January 2023. A revised SDCP (Version 6) submitted on 29 January 2024 was approved by the DCCEEW on the 19 July 2024 (Deep Yellow, 2024). Monitoring results are presented in the CAR, and the Sandhill Dunnart Reports are also provided to the DBCA and DCCEEW.
1046:M10.5	Terrestrial Fauna	The proponent shall continue to implement the version of the Terrestrial Fauna Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Terrestrial Fauna Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 10-1.	Implement the approved version of the Flora and Vegetation Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Terrestrial Fauna Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The TFMMP was approved by the EPA Services Division of the DWER on 20 February 2020. No revisions have been made during the reporting period.
1046:M11.1	Aboriginal Heritage	The proponent shall manage the implementation of the Proposal to meet the following environmental objective: (1) minimise impacts as far as practicable to registered sites DAA 1985 and DAA 1986 and unregistered sites.	Implement the approved Aboriginal Heritage Management Plan, so that the environmental objectives specified in condition 11-1 are met.	CAR Aboriginal Heritage Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Aboriginal Heritage Management Plan (AHMP) was approved by the EPA Services Division of the DWER on 3 January 2020. No impacts during the reporting period have occurred on the registered sites DAA 1985 and DAA 1986 and unregistered sites.
1046:M11.2	Aboriginal Heritage	The proponent shall consult with the Department of Aboriginal Affairs and prepare an Aboriginal Heritage Management Plan required by condition 7-1 that satisfies	Consult with Department of Aboriginal Affairs (DAA) in the preparation of the Aboriginal	Written and/or verbal correspondence from DAA.	Pre- construction	Prior to submission of the Aboriginal	CLD	The AHMP was developed in consultation with the DAA prior to submission to the CEO for approval.



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		the requirements of condition 7-2, to meet the objective of condition 11-1 for each stage of the Proposal to be implemented.	Heritage Management Plan before submission to the CEO for approval.			Heritage Management Plan to the CEO for approval.		The Aboriginal Heritage Management Plan (AHMP) was approved by the EPA Services Division of the DWER on 3 January 2020.
1046:M11.3	Aboriginal Heritage	The Aboriginal Heritage Management Plan required by condition 7-1 shall include provisions required by 7-2 to manage potential impacts of the proposal on aboriginal heritage including, but not limited to procedures for ground disturbance and environmental induction and training and may be submitted for each stage of the Proposal prior to ground disturbing activities being undertaken for that stage, to be approved by the CEO.	Implement the approved Aboriginal Heritage Management Plan.	Aboriginal Heritage Management Plan. CAR	Overall	Prior to ground disturbing activities.	С	The AHMP was developed in consultation with the DAA prior to submission to the CEO for approval. The Aboriginal Heritage Management Plan (AHMP) was approved by the EPA Services Division of the DWER on 3 January 2020. Approval has been received in writing from the CEO. The AHMP was implemented prior to ground disturbing activities. The status of compliance with the AHMP is reported in the CAR.
1046:M11.4	Aboriginal Heritage	The proponent shall continue to implement the version of the Aboriginal Heritage Management plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Aboriginal Heritage Management plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objective required by condition 11-1.	Implement the approved version of the Aboriginal Heritage Management Plan.	Written correspondence from CEO.	Overall	Implement current version of the Aboriginal Heritage Management Plan until the CEO confirms in writing that a new version has been approved.	С	Approval has been received in writing from the CEO of DWER on 3 January 2020. The approved version of the AHMP was implemented prior to ground disturbing activities.
1046:M12.1	Inland Waters Environmental Quality (Dewatering)	The proponent shall manage the abstraction of groundwater for dewatering and the reinjection to meet the following environmental objective: (1) minimise impacts to groundwater quality as far as practicable.	Implement the approved Groundwater Monitoring and Management Plan, so that the environmental objectives specified in condition 12-1 are met.	CAR Groundwater Monitoring and Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	C	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Groundwater Monitoring and Management Plan (GMMP) has been approved by the EPA Services Division of the DWER. Monitoring results are presented in the CAR. No dewatering or reinjection occurred during the reporting period
1046:M12.2	Inland Waters Environmental Quality (Dewatering)	The proponent shall consult with the Department of Mines and Petroleum and prepare and submit a Groundwater Monitoring and Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objectives required by condition 12-1.	Consult with DMIRS (formerly DMP) in the preparation of the Groundwater Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre- construction	Prior to submission of the Groundwater Monitoring and Management Plan to the CEO for approval.	CLD	The GMMP was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M12.3	Inland Waters Environmental Quality (Dewatering)	The Groundwater Monitoring and Management Plan required by 7-1 shall include provisions required by 7-2 to manage impacts on water quality including, but not limited to Acid and Metalliferous Drainage from seepage	Implement the approved Groundwater Monitoring and Management Plan.	Groundwater Monitoring and Management Plan.	Pre- construction	To be included in the Groundwater Monitoring and	CLD	The GMMP has been approved by the EPA Services Division of the DWER.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		into groundwater and the reinjection of surplus water into the aquifer.				Management Plan.		
1046:M12.4	Inland Waters Environmental Quality (Dewatering)	The proponent shall continue to implement the version of the Groundwater Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Groundwater Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objectives required by condition 12-1.	Implement the approved version of the Groundwater Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Groundwater Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The GMMP has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO.
1046:M13.1	Terrestrial Environmental Quality (Outcome based)	The proponent shall manage the implementation of the Proposal to meet the following environmental outcome: (1) maintain soil quality within background concentrations established during baseline studies 10 meters from areas where dewater has been used for dust suppression in Sandhill Dunnart Habitat (i.e. E3 and S6 vegetation communities).	Implement the approved Soil Monitoring and Management Plan, so that the environmental outcome specified in condition 13-1 are met.	CAR Soil Monitoring and Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The outcome-based Soil Monitoring and Management Plan (SMMP) has been approved by the EPA Services Division of the DWER. The CEMP was implemented once proposal implementation commenced. Monitoring results are presented in the CAR. No dewatering water has been used for dust suppression during the reporting period.
1046:M13.2	Terrestrial Environmental Quality (Outcome based)	The proponent shall consult with the Department of Mines and Petroleum and prepare and submit a Soil Monitoring and Management Plan required by condition 6-1 that satisfies the requirements of condition 6-2, to meet the outcome of condition 13-1.	Consult with DMIRS (formerly DMP) in the preparation of the Soil Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre- construction	Prior to submission of the Soil Monitoring and Management Plan to the CEO for approval.	CLD	The outcome-based SMMP was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M13.3	Terrestrial Environmental Quality (Outcome based)	The proponent shall continue to implement the version of the Soil Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Soil Monitoring and Management Plan required by condition 6-1 satisfies the requirements of condition 6-2 to meet the outcome required by condition 13-1.	Implement the approved version of the Soil Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Soil Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The outcome based SMMP has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1046:M14.1	Terrestrial Environmental Quality (Objective based)	The proponent shall manage the implementation of the Proposal to meet the following environmental objective: (1) minimise impacts on soil quality as far as practicable resulting from lignite oxidation within stockpiles and the use of dewater for dust suppression.	Implement the approved Soil Monitoring and Management Plan, so that the environmental objective specified in condition 14-1 is met.	CAR Soil Monitoring and Management Plan.	Overall	Once Proposal implementation commences. For the life of the project.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The SMMP has been approved by the EPA Services Division of the DWER. The CEMP was implemented once proposal implementation commenced. Monitoring results are presented in the CAR. No dewatering water has been used for dust suppression during the reporting period.
1046:M14.2	Terrestrial Environmental Quality (Objective based)	The proponent shall consult with the Department of Mines and Petroleum and prepare and submit a Soil Monitoring and Management Plan required by condition 7-1 that satisfies the requirements of condition 7-2, to meet the objectives required by condition 14-1.	Consult with DMIRS (formerly DMP) in the preparation of the Soil Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre- construction	Prior to submission of the objective based Soil Monitoring and Management Plan to the CEO for approval.	CLD	The SMMP was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M14.3	Terrestrial Environmental Quality (Objective based)	The Soil Monitoring and Management Plan required by 7-1 shall include provisions required by condition 7-2 to manage potential impacts to soil quality including but not limited to Acid and Metalliferous Drainage seepage into soil from oxidation of lignite and use of dewater for dust suppression.	Implement the approved Soil Monitoring and Management Plan.	Soil Monitoring and Management Plan Compliance Assessment Report.	Pre- construction	To be included in the objective based Soil Monitoring and Management Plan.	С	The SMMP has been approved by the EPA Services Division of the DWER. No dewatering was used for dust suppression during the reporting period.
1046:M14.4	Terrestrial Environmental Quality (Objective based)	The proponent shall continue to implement the version of the Soil Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Soil Monitoring and Management Plan required by condition 7-1 satisfies the requirements of condition 7-2 to meet the objective required by condition 14-1.	Implement the approved version of the Soil Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the objective based Soil Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	C	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The SMMP has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO.
1046:M15.1	Tailings Storage Facilities	The proponent shall manage the design and maintenance of all TSFs to meet the following environmental outcomes: (1) ensure that the tailings plume is within background groundwater concentrations at the M39/1080 lease boundary as shown in Figure 4 of Schedule 1 and defined by the geographic coordinates in Schedule 2; (2) ensure that the in-pit TSFs are designed to have at least 2 meters of carbonaceous material beneath them	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan, so that the environmental outcomes specified in condition 15-1 are met.	Tailings Storage Facility Monitoring and Management Plan. Compliance Assessment Report.	Overall	Once Proposal implementation commences. For the life of the project.	NR	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Tailings Storage Facility Monitoring and Management Plan (TSFMMP) has been approved by the EPA Services Division of the DWER.

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		and they are covered with a minimum of 1 meter of appropriate material to act as a capillary break at closure; and (3) ensure that the above-ground Tailings Storage Facility is designed to have at least a 1 meter clay liner beneath it and is covered with a minimum of 1 meter of appropriate material to act as a capillary break at closure.						No construction or operation of a TSF commenced during the reporting period.
1046:M15.2	Tailings Storage Facilities	The proponent shall consult with the Department of Mines and Petroleum and prepare a Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 that satisfies the requirements of condition 6-2, to meet the outcomes of condition 15-1.	Consult with DMIRS (formerly DMP) in the preparation of the Tailings Storage Facility Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre- construction	Prior to submission of the Tailings Storage Facility Monitoring and Management Plan to the CEO for approval.	CLD	The Tailings Storage Facility Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M15.3	Tailings Storage Facilities	The Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 shall include provisions required by condition 6-2 to manage impacts on groundwater quality including from, but not limited to seepage of contaminants into the groundwater and/or soil.	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan.	Tailings Storage Facility Monitoring and Management Plan. CAR	Pre- construction	To be included in the Tailings Storage Facility Monitoring and Management Plan.	С	The Tailings Storage Facility Monitoring and Management Plan has been approved by the EPA Services Division of the DWER. No construction or operation of a TSF commenced during the reporting period. When required the CEMP will be implemented, and monitoring results will be presented in the CAR.
1046:M15.4	Tailings Storage Facilities	The proponent shall continue to implement the version of the Tailings Storage Facility Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 satisfies the requirements of condition 6-2 to meet the outcomes required by condition 15-1.	Implement the approved version of the Tailings Storage Facility Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Tailings Storage Facility Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Tailings Storage Facility Monitoring and Management Plan has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO. No construction or operation of a tailings storage facility commenced during the reporting period.
1046:M16.1	Above Ground Tailings Storage Facility	The proponent shall manage the implementation of the Proposal to meet the following environmental outcome using the best available landform modelling over 10,000 years post mine closure: (1) ensure that the above ground Tailings Storage Facility is safe to members of public and non-human biota, geotechnically and geomorphologically stable, and geo chemically non-polluting.	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan, so that the environmental outcome specified in condition 16-1 are met.	Above Ground Tailings Storage Facility Monitoring and Management Plan. CAR	Overall	Once Proposal implementation commences. For the life of the project.	NR	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Above Ground Tailings Storage Facility Monitoring and Management Plan (AGTSFMMP) has been approved by the EPA Services Division of the DWER. No construction or operation of a tailings storage facility commenced during the reporting period.

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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
								When required the CEMP will be implemented, and monitoring results will be presented in the CAR.
1046:M16.2	Above Ground Tailings Storage Facility	The proponent shall consult with the Department of Mines and Petroleum in the preparation of the Above Ground Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 that satisfies the requirements of condition 6-2, to meet the outcome required by condition 16-1.	Consult with DMIRS (formerly DMP) in the preparation of the Above Ground Tailings Storage Facility Monitoring and Management Plan before submission to the CEO for approval.	Written and/or verbal correspondence from DMIRS.	Pre- construction	Prior to submission of the Above Ground Tailings Storage Facility Monitoring and Management Plan to the CEO for approval.	CLD	The Above Ground Tailings Storage Facility Monitoring and Management Plan was prepared in consultation with DMIRS prior to submission to the CEO for approval.
1046:M16.3	Above Ground Tailings Storage Facility	The Above Ground Tailings Storage Facility Monitoring and Management Plan required by condition 6-1 shall include provisions required by condition 6-2 to: (1) update the Landform Evolution Modelling at intervals not exceeding three (3) years, or as otherwise specified by the CEO, using digital elevation modelling data suited to the extent of the modelled area and consistent with best practice; and (2) detail appropriate rehabilitation measures, including, but not limited to timely trials for the revegetation of the tailings storage facility, where required.	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan.	Above Ground Tailings Storage Facility Monitoring and Management Plan. CAR	Overall	Once Proposal implementation commences. For the life of the project.	NR	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Above Ground Tailings Storage Facility Monitoring and Management Plan has been approved by the EPA Services Division of the DWER. No construction or operation of a TSF commenced during the reporting period. When required the CEMP will be implemented, and monitoring results will be presented in the CAR.
1046:M16.4	Above Ground Tailings Storage Facility	The proponent shall continue to implement the Above Ground Tailings Storage Facility Monitoring and Management Plan most recently approved by the CEO until the CEO has confirmed by notice in writing that the plan required by condition 6-1 satisfies the requirements of condition 6-2 to meet the outcome required by condition 16-1.	Implement the approved version of the Above Ground Tailings Storage Facility Monitoring and Management Plan.	Written correspondence from CEO.	Overall	Once Proposal implementation commences. Implement current version of the Above Ground Tailings Storage Facility Monitoring and Management Plan until the CEO confirms in writing that a new version has been approved.	С	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. The Above Ground Tailings Storage Facility Monitoring and Management Plan has been approved by the EPA Services Division of the DWER. Approval has been received in writing from the CEO. No construction or operation of a TSF commenced during the reporting period.
1046:M17.1	Staging and Timing for the Submission of Programs	Where these conditions require a management, monitoring or compliance reporting program to be submitted prior to a specified activity being undertaken, if that activity is to be undertaken in stages, then the management, monitoring or compliance reporting program may be submitted that relates only to (and prior to) the undertaking of that stage. Subsequent programs	No substantial works will be undertaken before the relevant Monitoring and Management Plans have been approved by the CEO.	Copies of Condition Environmental Management Plans. Written correspondence from CEO approving Plans.	Pre- construction	Submit Monitoring and Management Plans prior to the construction of each stage if required.	CLD	Substantial commencement of the project was acknowledged by DWER on 16 December 2021. All Monitoring and Management Plans have been submitted to, and approved by, the EPA Services Division of DWER. Approval has been received in writing from the CEO for all CEMP's.



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		submitted for the subsequent stages of that activity must						
		update and consolidate the program.						

3/14/2025

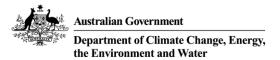
Mulga Rock Project

Reporting Period: 16 December 2023 to 15 December 2024



Appendix 3 – DCCEEW Approval of Sandhill Dunnart Conservation Plan

OFFICIAL



EPBC ref: 2013/7083

Mr Guy Clark
Principal Environment
Deep Yellow Limited
guy.clark@deepyellow.com.au

Approval of Sandhill Dunnart Conservation Plan, V6 for Mulga Rock Uranium Project Shire of Menziez, WA

Dear Mr Clark,

Thank you for your email dated 30 January to the Department seeking approval of the revised *Sandhill Dunnart Conservation Plan, V6, dated 29 January 2024*, in accordance with condition 2 of the above project under the *Environment Protection and Biodiversity Conservation Act 1999*.

Officers of the department have advised me on the plan and the requirements of the conditions of the approval for this project. On this basis, and as a delegate of the Minister for the Environment and Water (the Minister), I have decided to approve the revised *Sandill Dunnart Conservation Plan, V6, 29 January 2024*. This plan must now be implemented.

As you are aware, the department has an active monitoring program which includes monitoring inspections, desk top document reviews and audits. Please ensure that you maintain accurate records of all activities associated with, or relevant to, the conditions of approval so that they can be made available to the department on request.

Should you require any further information please contact by email to PostApproval@dcceew.gov.au.

Yours sincerely

Robin Nielsen Acting Director

Post Approvals (WA/NSW/ACT/Vic/Tas) Section

19 July 2024



Appendix 4 – Sandhill Dunnart and Feral Species Image Analysis (GHD, 2025)



999 Hay Street, Level 10 Perth, Western Australia Perth www.ghd.com

4 March 2025

То	Guy Clarke	Contact No.	9666 8689		
Copy to	Glen Gaikhorst	Email	Lucas.hurst@ghd.com		
From	Lucas Hurst	Project No.	12591259		
Project Name	Sandhill Dunnart Defined Area Management				
Subject	Sandhill Dunnart and Feral Species Image Analysis				

1. Introduction

1.1 Background

Vimy Resources Limited (ABN 56 120 178 949) (Vimy) is the proponent of the Mulga Rock Project (MRP or the Project). Effective from 4 August 2022, Vimy became a 100% owned subsidiary of Deep Yellow Limited (ABN 97 006 391 948) (Deep Yellow or the Company) following a Scheme of Arrangement (Merger). Deep Yellow is listed on the Australian Securities Exchange (ASX) and is the ultimate holding company in the Deep Yellow group of companies. Narnoo Mining Pty Ltd (ABN 81 084 713 100) (Narnoo) is the owner of the MRP, and the registered holder of the tenements associated with the MRP. Narnoo, as a 100% owned subsidiary of Vimy, is now part of the Deep Yellow group of companies.

Vimy referred the MRP on the 28 November 2013 under the Environmental Protection Biodiversity Conservation Act 1999 (Cth) (EPBC Act) to the Department of Agriculture, Water and the Environment (DAWE) (EPBC 2013/7083). On 7 January 2014, DAWE determined MRP a "controlled action", with the controlling provisions being "listed threatened species and communities" and "nuclear actions", to be assessed under the bilateral agreement with the Western Australian State Government. The MRP was federally approved on the 2 March 2017 with a condition attached to offset the residual impact to the Sandhill Dunnart (*Sminthopsis psammophila*), which is listed as endangered under both the Biodiversity Conservation Act 2016 (WA) (BC Act) and the EPBC Act.

GHD has been assisting the Company at the MRP since 2014 with the identification and analysis of remote camera images for small mammal species. The focus species for undertaking this work is the Sandhill Dunnart. The initial programs (2014) were focused on establishing best technique and camera types to use to capture Sandhill Dunnarts. In 2015 this program was extended to 15 sites around the MRP operational area with the program extending more regionally in late 2015. This data and analysis were presented in GHD (2021a).

Condition 2 of the EPBC 2013/7083 approval requires the preparation of a Sandhill Dunnart Conservation Plan (SDCP) to reduce the impact to the Sandhill Dunnart (SHD) posed by feral animals within a Defined Area. The SDCP is based around a 6000ha portion of land (Defined Area) within the Sandhill Dunnart's known distribution. To implement the SDCP an understanding of the presence of the species and feral animals was required including an understanding of baseline data. The SDCP document was submitted and approved in November 2022 (GHD 2022b).

Within the SDCP is a study plan (which was first developed by GHD (2021b) to locate remote camera locations within the Defined Area to obtain preliminary data of Sandhill Dunnart presence and feral species use. GHD compiled a summary memo of Sandhill Dunnart and feral species presence within the Defined Area (GHD 2024a) and covered from camera establishment (November 2021) to August 2022. An additional progress summary memo was also produced in December 2023 covering camera data from the previous memo for the period November 2021 to August 2022 (GHD 2024a) and August 2022 to May 2023 (GHD 2023). A memo that compiled two-years' (note period covered) worth of camera images to establish baseline data to be used within the SCMP, SDCP for future triggers and monitoring of SHD and feral species within the Defined Area was completed in January 2024 (GHD 2024b).

This memo provides the raw data for the following 6 months of camera data (November 2023 to May 2024).

Purpose of this Memorandum

This memorandum provides:

- Evidence of Sandhill Dunnart presence and use within the Defined Area
- A brief analysis of events and locations that recorded Sandhill Dunnart
- Evidence of all feral species events recorded on remote camera

Scope and limitations

This memorandum has been prepared by GHD for Deep Yellow and may only be used and relied on by Deep Yellow for the purpose agreed between GHD and Deep Yellow as set out in section 1.2 of this memorandum. GHD otherwise disclaims responsibility to any person other than Deep Yellow arising in connection with this memorandum. GHD also excludes implied warranties and conditions, to the extent legally permissible. The services undertaken by GHD in connection with preparing this memorandum were limited to those specifically detailed in the memorandum and are subject to the scope limitations set out in the memorandum.

GHD has prepared this memorandum based on information provided by Deep Yellow and others who provided information to GHD (including Government authorities and private individuals), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the letter report which were caused by or omissions in that information.

Site conditions may change after the date of the field survey. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this memorandum if the site conditions change.

Methodology

Infra-red cameras

The device Reconyx Hyperfire 550, utilizing white LED flash for colour day/night photo capture at close range were used across at 25 of the designated 30 sites as presented in GHD2021b.

Sensitivity and trigger response

All cameras were set up in the same format with high sensitivity and a camera trigger speed of 1.34 and 0.2 seconds. The trapping efficiency for Sandhill Dunnart (Sminthopsis psammophila) was calculated by utilising one event over a 24-hour period per species and calculating all events at a site divided by total number of camera trap nights across all sites.

Trapping layout

Camera layout formations were kept consistent across all sites, employing a doublet design along an "X" fence line with horizontal cameras placed on posts facing south at its central point. As such, each site consisted of two deployed devices for greater coverage, represented as cameras A and B at each site. The trap layout is described in greater detail in GHD 2021b.

Fresh batteries and SD cards are replaced on the regular basis and downloaded into a central database and labelled accordingly. All images are stored in site and device (A or B) before sending the dataset to GHD for assessment.

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Identification

Sandhill Dunnart (Sminthopsis psammophila) were identified in accordance with the Deep Yellows Camera Trapping Protocol, Sandhill Dunnart (Sminthopsis psammophila) of the Mulga Rock Project Area (Vimy 2015) and via the consultant's specialist experience. Glen Gaikhorst has worked on Sandhill Dunnarts since 2001 both in and ex situ.

A confidence key was developed to demonstrate the consultant's confidence in the species identification provided. This is presented below in Table 1.

Table 1 Confidence key for image analysis

Confidence key	
High	High level of confidence of species identification (clear morphological characteristics)
Moderate	Moderate level of confidence of species identification (lacking some degree of detail)
Low	Low level of confidence (blurred image or lacking significant detail detail)

1.2 Event definition

An event was defined as any identification image series within a 24-hour period, unless multiple size classes/life stages were observed, providing strong evidence multiple individuals were present, then further events were recorded. Figure 1 demonstrates life stage of juvenile, sub adult and Adult.

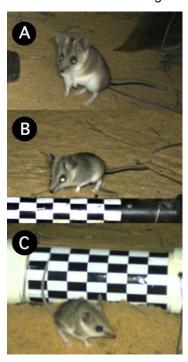


Figure 1 Shows size class variation of Sminthopsis psammophila present across the survey area. A); adult individual, B); sub-adult individual, C); juvenile individual.

2. Results

From the images analysed from the Mulga Rocks project between November 2023 and early May 2024, (a period of approximately 180 days), the Sandhill Dunnart (*Sminthopsis psammophila*) was identified on 47 remote camera devices across 24 sites providing 486 discreet events (Table 2). Only one site (Site 4) did not record Sandhill Dunnart during this period, which is consistent with all previous assessments (GHD 2024b). This infers based on raw data (Figure 2) there continues to be a good representative population of Sandhill Dunnart persisting within the Defined Area.

Sandhill Dunnart (*Sminthopsis psammophila*) discreet events decreased this period from those previous however from the two-year analysis of data (GHD 2024b) the November to January period is typically the least active for the species (see Figure 2). This is due to the period not being breeding and falls prior to the dispersal of young and therefore not having increased activity over this period. Young dispersal was observed during the month of April 2024 (Figure 2).

Predatory feral species, consisting of a cat (*Felis catus*) and a red fox (*Vulpes vulpes*) recorded on 10 devices across 10 sites providing 12 discreet events (see Table 3 and 4). 1 discreet event was observed, consisting of a camel (*Camelus dromedarius*) (see Table 5). All these events were singular inferring the presence of invasive predatory species is low within the Defined Area as has been observed in previous survey periods recorded (GHD 2024b).

It was observed that between November 2023 and early May 2024 there was a decrease in discreet events of red fox (*Vulpes vulpes*) throughout the defined area. Discreet events for cat's (*Felis catus*) and camels (*Camelus dromedarius*) saw no major increases within the Defined area.

3. Conclusion

The Sandhill Dunnart Conservation Plan (GHD 2024a) states an increase in feral animals within the Defined Area must record three consecutive departures (standard deviation) of species numbers above the estimated baseline level. Given the low number of feral species recorded over the two-year baseline monitoring period, statistical analysis was not undertaken (GHD 2024b).

Between November 2023 and early May 2024, it can be concluded that no significant reduction was observed within the Sandhill Dunnart population from the baseline parameters (GHD 2024b). It was also observed that feral animal discreet events decreased further from the two-year baseline (GHD 2024b) where a statistical analysis couldn't be undertaken due to the low number of feral species recorded.

It can be determined that no feral animal control program is required within the Defined Area based on the data collected between November 2023 and early May 2024.

4. Reference

GHD (2021a). Sandhill Dunnart Camera Trap Monitoring - Small mammal identification and analysis. Unpublished report for Vimy Resources, Perth, Western Australia.

GHD (2021b). Sandhill Dunnart Study Plan. Unpublished report for Vimy Resources, Perth, Western Australia.

(GHD 2024a). Defined Area Conservation Land Management Plan - Mulga Rock Project. Unpublished report for Deep Yellow

(GHD 2024b). Sandhill Dunnart Defined Area - Species Image Analysis Baseline Assessment. Unpublished memo for Deep Yellow

Vimy Resources (2015) Camera Trapping Protocol – Sandhill Dunnart (Sminthopsis psammophila) – Mulga Rock Project Area. Unpublished report

Regards,

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Table 2 Displays captured events of the Sandhill Dunnart (Sminthopsis psammophila). Events were defined as any identification series within a 24-hour period, unless multiple size classes/life stages were observed then further events were recorded.

Sites	Period Nov 21 to Aug 22	Period Sept 22 to May 23	Period Jun 23 to Nov 23	Nov 23 to early May 24
	8 months	8 months	5 months	6 months
Site 1 A	5	0	0	3
Site 1 B	13	2	2	3
Site 2 A	5	3	12	2
Site 2 B	4	5	12	3
Site 3 A	4	11	17	14
Site 3 B	12	7	18	7
Site 4 A	0	0	0	0
Site 4 B	0	0	0	0
Site 5 A	13	49	54	31
Site 5 B	8	30	41	23
Site 6 A	1	1	1	11
Site 6 B	2	0	2	18
Site 7 A	7	33	20	11
Site 7 B	4	24	12	10
Site 8 A	9	12	19	19
Site 8 B	12	21	21	3
Site 9 A	0	8	28	8
Site 9 B	4	8	13	7
Site 10 A	4	1	8	8
Site 10 B	0	2	10	1
Site 11 A	8	1	1	4
Site 11 B	9	6	1	16
Site 12 A	27	7	0	16
Site 12 B	20	23	11	24
Site 13 A	6	38	29	44
Site 13 B	9	58	89	68
Site 14 A	3	3	1	4
Site 14 B	2	2	2	1
Site 15 A	9	3	10	2
Site 15 B	5	7	8	1
Site 17 A	0	5	11	3
Site 17 B	21	1	5	5
Site 18 A	0	10	11	2
Site 18 B	1	7	13	7
Site 19 A	4	15	12	2
Site 19 B	22	0	10	6
Site 20 A	3	7	24	9

Sites	Period Nov 21 to Aug 22	Period Sept 22 to May 23	Period Jun 23 to Nov 23	Nov 23 to early May 24
	8 months	8 months	5 months	6 months
Site 20 B	21	21	20	5
Site 21 A	17	9	12	10
Site 21 B	2	8	2	7
Site 22 A	14	7	10	14
Site 22 B	3	1	1	4
Site 23 A	0	10	7	0
Site 23 B	0	8	12	11
Site 28 A	6	20	4	5
Site 28 B	8	10	7	8
Site 29 A	14	4	3	10
Site 29 B	9	7	3	3
Site 30 A	13	32	60	12
Site 30 B	12	20	45	1

Table 3 Displays captured events of foxes (Vulpes vulpes) activity per device per site. Devices where event captures were not observed were excluded.

Sitos	Period Nov 21 to Nov 23	Nov 23 to early May 24	
Sites	2 years	6 months	
Site 8 A	1	0	
Site 11 A	3	2	
Site 11 B	4	0	
Site 12 A	3	0	
Site 12 B	2	0	
Site 13 A	1	0	

Table 4 Displays captured events of feral cat (Felis catus) activity per device per site. Devices where event captures were not observed were excluded.

Site	Period Nov 21 to Nov 23	Nov 23 to early May 24
	2 years	6 months
Site 1 B	0	1
Site 5 A	0	1
Site 6 A	0	1
Site 7A	1	0
Site 7 B	1	0
Site 8 A	2	0
Site 9 A	1	0
Site 9 B	1	0
Site 10 A	0	1
Site 10 B	1	0

Site	Period Nov 21 to Nov 23	Nov 23 to early May 24
	2 years	6 months
Site 15 A	0	1
Site 15 B	1	0
Site 17 B	1	0
Site 18 B	2	1
Site 19 A	1	0
Site 20 A	1	1
Site 20 B	2	0
Site 21 B	1	0
Site 22 B	2	0
Site 23 A	1	1
Site 28 B	3	2
Site 30 A	1	0
Site 30 B	1	0

Table 5 Displays captured events of feral camels (Camelus dromedarius) activity per device per site. Devices where event captures were not observed were excluded.

Sites	Period Nov 21 to Nov 23	Nov 23 to early May 24		
Sites	2 years	6 months		
Site 10 B	0	1		
Site 15 A	1	0		
Site 29 A	1	0		

Figure 2 Raw data of events per month within the defined area

