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Environment and Compliance Superintendent
Tarago Operations Pty Ltd
Tarago, NSW, 2580

13/10/2025

Woodlawn Copper Mine – Environmental Management Strategy (EMS)

Dear Ms. Crook

Thank you for submitting the EMS in accordance with Condition 1, Schedule 6 of the consent for the Woodlawn Copper Mine (MP07_014PA-33). I also acknowledge your response to the Department's review comments and request for additional information.

I note the EMS contains the information required by the conditions of approval.

Accordingly, as nominee of the Planning Secretary, I approve the revised EMS (Rev.10, October 2025).

You are reminded that if there are any inconsistencies between the Plan and the conditions of approval, the conditions prevail.

Please ensure you make the document publicly available on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Charissa Pillay on 02 99955944.

Yours sincerely



Stephen O'Donoghue
Director
Resource Assessments

As nominee of the Planning Secretary

DEVELOP

Environmental Management Strategy

Woodlawn Zinc Copper Project

Document Review/Change History

| Date | Summary of review and changes | Revision No. | Authors | |
|------------|---|--------------|------------|-------------|
| | | | Drafted by | Reviewed by |
| 02/05/2023 | Draft for internal Review | 1 | HS | RB |
| 02/07/2014 | Issue to Department of Planning and Environment | 2 | RB | HS |
| 11/12/2014 | Amend company details | 3 | RB | HS |
| 03/04/2018 | General update | 4 | RB | AL |
| 10/5/2018 | Issued to DPE | 5 | RB | AL |
| 03/07/2018 | Incorporation of DPE Comments | 6 | RB | AL |
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| 06/06/2024 | Amend company details, refine plan, updates following revised company strategy | 8 | KC | AVN |
| 10/09/2025 | Updated for submission to major projects portal | 9 | KC | AVN |
| 02/10/2025 | Plan updated in response to DPHI RFI (MP07_0143-PA-33) and re-submitted to the major project's portal | 10 | KC | KC |

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Glossary

| Acronym | Definition |
|-------------------------|---|
| AS | Australian Standard |
| CCC | Community Consultative Committee |
| DEVELOP | Develop Global Limited |
| dB | Decibel |
| DPHI | Department of Planning, Housing and Infrastructure |
| EA | Environmental Assessment |
| ECS | Environment and Compliance Superintendent |
| EMS | Environmental Management Strategy |
| EP&A | Environmental Planning and Assessment |
| EPA | Environment Protection Authority |
| EPL | Environmental Protection Licence |
| g.m ² /month | Grams per square meter per month |
| ISO | International Organization for Standardisation |
| INX | The currently adopted compliance and incident tracking platform used by DEVELOP |
| m | Metre |
| mm/s | Millimetre per second |
| NA | Not Applicable |
| NZS | New Zealand Standard |
| NSW | New South Wales |
| PIRMP | Pollution Incident Response Management Plan |
| PM10 | Particulate matter <10 µm |
| POEO | Protection of the Environment Operations |
| S(C&PL) | Special (Crown and Private Lands) |
| Secretary | The Secretary of the Department, or nominee and/or delegate |
| SML | Special Mining Lease |
| SOC | Statement of Commitments |
| TARPs | Trigger Action and Response Plans |
| The Project | Woodlawn Copper-Zinc Mine |
| TSP | Total suspended particulate |
| WAL | Water Access License |

1. INTRODUCTION

1.1. Background

The Woodlawn Copper-Zinc mine (the Project) is located approximately 7 km northwest of Tarago in New South Wales (NSW) within Special (Crown and Private Land) Mining Lease no. 20 (SML20) as shown in Plan 1, Appendix 1. The original Woodlawn mine operated from 1978 to 1998 and processed 13.8Mt of ore from the Woodlawn open pit, underground and minor satellite deposits. Following its prolonged closure, the Project was acquired by Heron Resources who secured Project Approval in July 2013 following the public exhibition of the Projects Environmental Assessment (EA). Heron completed the construction of the Project and developed the new underground mine in accordance with the Project Approval before it was put on care and maintenance in March 2020. Heron was placed in administration in July 2021. Develop Global Limited (DEVELOP) completed its acquisition of the Project in May 2022 and Tarago Operations Pty Limited which holds Special Mining Lease (SML) 20 and Environmental Protection License (EPL) 20821. Veolia operates an eco-precinct, including a licensed landfill, within SML20 but separated from the project and has separate EPL's as shown in Plan 1, Appendix 1.

Based on the document review/change history, DEVELOP understands this EMS was initially submitted to Department of Planning and Environment in 2014 and again in 2018, It is assumed that in both instances the plans were subsequently approved, however, due to the change in site ownership DEVELOP has not been able to confirm this. Version 6 is assumed to have been most recently approved in 2018. Once this version (9) is subsequently approved the approval letter will be attached as the front page.

DEVELOP is committed to managing its activities in an environmentally responsible manner in accordance with the Environmental Policy (included in Appendix 2). The overarching Environmental Management System includes the management of both environmental and declared dam aspects which both have underpinning plans and documentation as summarised in Figure 1-1.

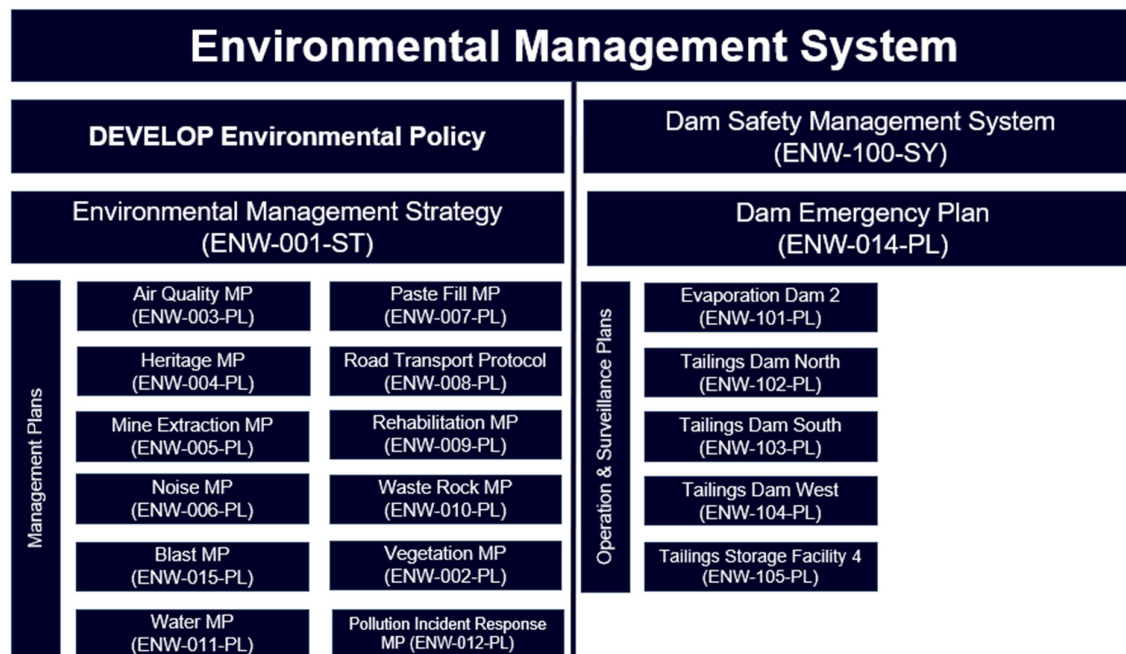


Figure 1-1 Environmental Management System Overview

| | | | | |
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Although the environmental and dam safety aspects of the system are interconnected through some of the licenses, approvals and management plans, this Environmental Management Strategy (EMS) does not include dam safety aspects which are documented separately.

1.2. Scope and objectives

Through effective management practices such as this EMS, DEVELOP aims to ensure activities minimise environmental risk at all stages of its operations. Specifically, the objective of this EMS is to:

- Identify the statutory approvals that apply to the Project
- Implement the commitments made in the EA including specific conditions of approval and the Statement of Commitments.
- Provide the strategic framework for the environmental management of the Project
- Align with DEVELOPs overarching environmental policy and standards.
- Describe the role, responsibility, authority and accountability of key personnel involved in the environmental management of the Project
- Describe the procedures to be implemented to:
 - Keep the local community and relevant agencies informed about the operational and environmental performance of the Project;
 - Receive, handle, respond to and record complaints;
 - Resolve any disputes that may arise during the Project;
 - Respond to any non-compliance; and
 - Respond to emergencies.

1.3. Applicable legislation

The key NSW and Commonwealth legislation applicable to the Project (but not necessarily limited to):

- *Biodiversity Conservation Act, 2016*
- *Biosecurity Act, 2015*
- *Contaminated Land Management Act, 1997*
- *Dangerous Goods (Road and Rail Transport) Act, 2008*
- *Dams Safety Act, 2015*
- *Environmental Planning and Assessments Act, 1979*
- *Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth).*
- *Environmentally Hazardous Chemicals Act, 1985*
- *Explosives Act 2003*
- *Local Government Act, 1993*
- *Mining Act, 1992*
- *National Greenhouse and Energy Reporting Act, 2007 (Commonwealth).*
- *National Parks and Wildlife Act, 1974*
- *Roads Act, 1993*

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- *Protection of the Environment Operations (POEO) Act, 1997*
- *Protection of the Environment Administration Act, 1991*
- *Soil Conservation Act, 1938*
- *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries), 2007*
- *Waste Avoidance and Resource Recovery Act, 2001*
- *Water Act, 1912*
- *Water Management Act, 2000*
- *Work Health and Safety (Mines and Petroleum Sites) Act 2013*

The Project is governed by the following:

- Project Approval: as issued in 2013 and amended in 2016 and 2017. Document ID: 07_0143MOD2
- EPL 20821 as issued by the NSW Environmental Protection Agency (EPA)
- SML 20

1.4. Guidelines and standards

The applicable policies, guidelines and Australian Standards (AS), which further prescribe the statutory requirements to be integrated into the EMS are detailed in the relevant Management Plans. In relation to this EMS the following are applicable:

- AS/NZS ISO 14001:2016 – Environmental Management systems guidelines.
- ISO 19011:2018 - Guidelines for auditing management systems.

1.5. Consents, leases, licenses and permits

Project activities are conducted in accordance with several licences, permits and leases as summarised in Appendix 3.

1.6. Project Approval

This EMS has been developed in accordance with the Project Approval and Statement of Commitments (SOC). Table 1-1 outlines these including reference to where each of the relevant conditions and commitments are addressed.

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Table 1-1 Consent conditions relating to the EMS

| Condition | Condition description | Where addressed |
|---------------------------|--|--|
| Schedule 5 Condition 1 | Within two weeks of obtaining monitoring results showing: (a) an exceedance of any relevant noise criteria in Schedule 4, the Proponent shall notify affected landowners and/ or tenants in writing of the exceedance, and provide regular monitoring results to each of these affected parties until the project is again complying with the relevant criteria; and (b) an exceedance of any relevant air quality criteria in Schedule 4, the Proponent shall send the affected landowners and/ or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time). | Section 3.5.2 |
| Schedule 6 Condition 1 | The Proponent shall prepare and implement an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted for approval to the Secretary within 12 months of this approval; (b) provide the strategic framework for the environmental management of the project; (c) identify the statutory approvals that apply to the project; (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; (e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • respond to emergencies; and (f) include: <ul style="list-style-type: none"> • copies of any strategies, plans and programs approved under the conditions of this approval; and • a clear plan depicting all the monitoring required to be carried out under the conditions of this approval. | This plan Section 2 Section 1.5 Section 2.1 Section 2.3 Section 2.4 Section 2.4 Section 3 Section 2.5 Section 3.1 |
| Schedule 6 Condition 2 | The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedules 3 and 4. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity: (a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary | Section 3 |
| Schedule 6 Condition 4 | By the end of December each year (or other such timing as agreed by the Secretary), the Proponent shall review the environmental performance of the project to the satisfaction of the Secretary. This review must: | Section 3.2 Appendix 6 |

| Condition | Condition description | Where addressed |
|----------------------------|---|-----------------|
| | <p>(a) describe the development (including any rehabilitation) that was carried out in the past year, and the development that is proposed to be carried out over the next year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the project over the past year, which includes a comparison of these results against the:</p> <ul style="list-style-type: none"> the relevant statutory requirements, limits or performance measures/criteria; requirements of any plan or program required under this approval; the monitoring results of previous years; and the relevant predictions in the EA; <p>(c) identify any non-compliance over the past year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the next year to improve the environmental performance of the project.</p> | |
| Schedule 6 Condition 5 | <p>Within three months of:</p> <p>(a) the submission of an annual review under Condition 4 above;</p> <p>(b) the submission of an incident report under Condition 7 below;</p> <p>(c) the submission of an audit under Condition 9 below; or</p> <p>(d) any modification to the conditions of this approval (unless the conditions require otherwise), the Proponent shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p> | Section 3.7 |
| Schedule 6 Condition 6 | <p>The Proponent shall establish and operate a CCC for the project in general accordance with the Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects (Department of Planning, 2007, or its latest version), and to the satisfaction of the Secretary. This CCC must be operating prior to commencing construction of the project.</p> <p>Notes:</p> <ul style="list-style-type: none"> CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval; and In accordance with the guideline, the Committee should be comprised of an independent chair and appropriate representation from the Proponent, Council, recognised environmental groups and the local community. | Section 2.3.2 |
| Schedule 6 Condition 7 | <p>The Proponent shall notify the Secretary and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within seven days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident.</p> | Section 3.7 |
| Schedule 6 Condition 8 | <p>The Proponent shall provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any approved plans of the conditions of this approval.</p> | Section 3.2 |
| Schedule 6, Condition 9 | <p>Within one year of commencing construction of the project, and every three years thereafter, unless the Secretary directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. The audit must:</p> | Section 3.3 |

| Condition | Condition description | Where addressed |
|--------------------------|--|-----------------|
| | <p>(a) be conducted by a suitably qualified, experienced and independent team of experts (including a mine site rehabilitation and water quality expert) whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the project, and/ or any assessment, plan or program required under the abovementioned approvals.</p> | |
| Schedule 6, Condition 10 | Within six weeks of the completion of this audit, or as otherwise agreed by the Secretary, the Proponent shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report. | Section 3.3 |
| Schedule 6, Condition 11 | <p>Prior to the commencement of construction on the site, the Proponent shall:</p> <p>(a) make copies of the following publicly available on its website:</p> <ul style="list-style-type: none"> the documents referred to in Condition 1 of Schedule 2; all relevant statutory approvals for the project; all approved strategies, plans and programs required under the conditions of this approval; a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any approved plans or programs required under the conditions of this or any other approval; a complaints register, which is to be updated on a monthly basis; minutes of CCC meetings; the annual reviews required under this approval; any independent environmental audit of the project, and the Proponent's response to the recommendations in any audit; any other matter required by the Secretary; and <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p> | Section 2.3.2 |
| Schedule 6 Condition 2 | <p>The Proponent shall assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedules 3 and 4. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Proponent shall, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary</p> | Section 3 |
| SOC Item 1A | An Environmental Management System would be developed and implemented on the Project Site. | This document |

2. IMPLEMENTATION AND OPERATION

2.1. Roles and responsibilities

The role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Project is detailed in Table 2-2.

Table 2-2 Roles and Responsibilities

| Position / Role | Authority and Responsibility |
|---|---|
| General Manager | Overall responsibility for mining, process operations, environmental management and performance and site service activities. Accountable for: <ul style="list-style-type: none"> • Strategic direction in accordance with the Environmental Policy. • The environmental performance of all activities undertaken at the Woodlawn Mine. • Provision of an adequate number of appropriately qualified personnel and resources to carry out the obligations of the EMS. • Provision of leadership and a demonstrated commitment towards the implementation and continual improvement of the EMS. • Provision of direction and support to the Environment and compliance Superintendent (ECS) and site environmental and rehabilitation personnel. |
| Environment and Compliance Superintendent (ECS) | Responsible for the environmental performance of the project and the EMS including: <ul style="list-style-type: none"> • Coordination of the development, communication, implementation and maintenance of the EMS and associated Environmental Management Plans and environmental monitoring programs. • Review of monitoring data for compliance and non-conformances. • Assigning and monitoring of EMS related corrective actions. • Provide assistance, advice or input to the External Relations Superintendent in responding to EMS related complaints or enquiries. • EMS related external reporting and response to regulatory requests. • Provide input into any environmental incidents including the development of corrective actions as required. • Conduct internal compliance audits of applicable regulatory approvals, licenses and other legislation for the Project. |
| External Relations Superintendent | Notification and communication of aspects within the EMS including: <ul style="list-style-type: none"> • Assist with incident notification, reporting and responses to regulatory agencies. • Establishment and maintenance and of the Community & Complaints 24/7 Hotline. • Manage external government, media and community consultation. • Coordination of the site Community Consultative Committee. |
| Health and Safety Superintendent | Responsible for maintaining key aspects related to the EMS including: <ul style="list-style-type: none"> • Emergency response including personnel and plans. • Maintain the training and competencies and chemical register records. • Incident tracking and the Incident Management Procedure. • Provision and up-keep of suitable software in order to document incidents and track actions. • Ensure EMS aspects are considered in any applicable routine inspections or checklists with any relevant findings/actions communicated to ECS. |

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| Position / Role | Authority and Responsibility |
|---|---|
| Other superintendents, managers and supervisors | <p>Responsible for ensuring all activities are carried out in accordance with environmental legislation, DEVELOP policies and the EMS including:</p> <ul style="list-style-type: none"> • Provide support for ECS responsibilities and the implementation of the EMS • Ensuring compliance with approvals, licenses and EMP's associated with the Projects EMS. • Consider past environmental performance when engaging contractors • Notification of environmental incidents to the ECS. • With assistance from ECS, investigation and implementation of any corrective actions arising from environmental incidents and audits. • Ensure Pronto is kept up-to-date with preventative maintenance records and schedules as required under the EMS. |
| All Employees and Contractors | <p>Responsible for conducting all activities in accordance with environmental legislation, DEVELOP policies and the EMS including:</p> <ul style="list-style-type: none"> • Immediately reporting environmental related incidents. • Obtaining necessary environmental approvals prior to starting works involving any vegetation clearance or top soil disturbance. • Maintaining a continued awareness of environmental issues, this EMS and DEVELOPs policies. • Commitment to undertaking good housekeeping practices to avoid adverse environmental outcomes. |

2.2. Competencies training and awareness

The EMS requires that all employees at Woodlawn receive an appropriate level of environmental awareness training. This training is tailored to the requirements of the Project and places an emphasis on the environmental risks and consequences that can arise from operations.

2.3. Communication and consultation

DEVELOP believes that the support and endorsement of its activities by the communities in which it operates is fundamental to the long-term success of its business. The Stakeholder Relations Policy included in Appendix 2 underpins the Stakeholder Engagement Plan which provides the governing principles for communication and consultation. Key aspects of communication and consultation are described in subsequent sections.

2.3.1. Interaction with Veolia

A cooperation agreement exists between both the operators of the mine and bioreactor which guides the management of operational impacts. The agreement also acknowledges that each party is entitled to carry out their activities in each respective area of operations which may cause nuisance.

2.3.2. Community Consultative Committee

DEVELOP is committed to consulting with the wider community and strives to achieve a high standard of community awareness and communication. The Community Consultative Committee (CCC) was established in 2015 as part of the construction phase of the Project and continues to meet regularly as an advisory committee, and to address Project Approval requirements (Condition 6, Schedule 6). The CCC structure includes an Independent Chair, two stakeholder representatives, five community representatives, and an endorsed alternate

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member as a substitute community representative, as per the condition requirements. The CCC is operated consistent with the Departments *Community Consultative Committee Guidelines for State Significant Projects 2023*.

DEVELOP continues to meet regularly with the CCC under the CCC guidelines during its tenure as owner of the Woodlawn Mine. The CCC will meet at least four times per year as a recommended frequency for operating mines. In accordance with Condition 1, Schedule 6, a copy of the minutes of the CCC meetings will be made available on the DEVELOP website.

2.3.3. External communication

External communication is undertaken in accordance with the strategy outlined in DEVELOPs Stakeholder Engagement Plan. As well as the reporting requirements detailed in Section 3.2 other external communication may include: radio and print advertising, website, letter drops to neighbours and the community and participation/attendance at community events.

2.3.1. Community hotline: 1800 371 124

DEVELOP encourages early engagement by stakeholders to ensure open communication with individuals and community members potentially impacted by day-to-day operations. Community enquiries or concerns relating to environmental matters at Woodlawn Mine can be directed to DEVELOP via the Community Hotline 1800 371 124 which is available 24 hours/day, seven days a week.

2.3.2. DEVELOP Website

DEVELOP maintains a public web site (www.develop.com.au) which provides an avenue for external dissemination of information and monitoring results. As specified in condition 1, Schedule 6 the following will be made publicly available on this website and kept up to date:

- the documents referred to in Condition 1 of Schedule 2;
- all relevant statutory approvals for the project;
- all approved strategies, plans and programs required under the conditions of the Project Approval;
- a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any approved plans or programs required under the conditions of this or any other approval;
- a complaints register, which is to be updated monthly;
- minutes of CCC meetings;
- the annual reviews required under the Project Approval;
- any independent environmental audit of the project, and associated response to the recommendations in any audit;
- any other matter required by the Secretary.

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2.3.3. Internal communication

Environmental performance and initiatives are communicated to staff, contractors and visitors through:

- Routine reporting
- Induction process
- Incident or near-miss findings

2.4. Complaints and dispute resolution

Operational related complaints may be received:

- Directly via the Community Hotline (available 24/7): 1800 371 124
- Directly via the website: <https://www.develop.com.au/contact-us/>
- Directly via the CCC
- Indirectly via government agencies

In accordance with EPL Condition 11(a), Schedule 6, a complaints register is maintained with details of all complaints received and is publicly available on the DEVELOP website. The record of a complaint will be kept for at least four years after the complaint was made. The register records the following details:

- Complainant name and contact details;
- Nature of the complaint (noise, dust, traffic etc);
- Time and date of the complaint;
- Details surrounding the complaint;
- Actions taken to resolve the complaint or if no action taken then the reason why; and
- Confirmation that the complaint has been resolved.

The flow chart presented in Appendix 4 depicts the process following receipt of a community complaint.

DEVELOP will endeavour to resolve community complaints to the satisfaction of the complainant in accordance with the Complaints and Grievances Technical Guideline. However, in the event of an unresolved dispute, a complainant may refer to the matter to the Department seeking to initiate the Independent Review process as detailed in Schedule 5, Conditions 2 to 4.

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2.5. Emergency response

DEVELOP will maintain a Pollution Incident and Response Management Plan (PIRMP) for the Project in accordance with the requirements of EPL20821 and the *POEO Act*. The PIRMP provides an emergency procedure for environmental incidents (including dam related pollution emergencies) and includes specific communication and notification obligations. The PIRMP describes:

- Existing controls to prevent pollution incidents.
- Incident response actions to mitigate potential incidents.
- Immediate reporting of pollution incidents to relevant statutory authorities.
- Maintaining communications with appropriate regulatory authorities during incident response.
- Reporting of incidents to stakeholders including local communities.
- Site specific roles and responsibilities in incident response and reporting.

The PIRMP provides notification procedures as required by the *POEO Act* and the (POEO(G) Regulation). These include compulsory notifications, other agencies and nearby residents depending on the nature of the pollution incident.

The sites dams are subjected to a more detailed Dam Emergency Plan (ENW-014-PL) which also links to the PIRMP and the Projects overarching Emergency Response Control Plan (HSW-PCP-003).

| | | | | |
|---------------|-----------------------------------|--------------|------------|-------------------|
| Document : | ENW-001-ST | Issue Date | 02/10/2025 | Version#: 10 Rev0 |
| Document Name | Environmental Management Strategy | Review Date | 02/10/2026 | |
| Prepared by : | KC | Approved by: | KC | Page 15 of 27 |

3. CHECKING AND CORRECTION

3.1. Environmental monitoring program

The Project manages environmental aspects of its operations by ensuring that appropriate management plans have been prepared in accordance with statutory requirements and that these plans are effectively implemented throughout all areas of the operation. Current versions of the management plans are publicly available on DEVELOPs web site and include:

- Air quality management plan, V 11 dated September 2025, approved 15 September 2025
- Heritage management plan, V 11 dated August 2025, approved 1 September 2025
- Mine extraction management plan, V 7 dated 20 July 2019, approved 29 August 2019
- Noise management plan, V 13 dated September 2025, approved 15 September 2025
- Blast management plan, dated May 2017, approved 12 May 2017
- Water management plan, dated May 2017, approved 12 May 2017
- Road transport protocol, V11 dated 8 April 2025 approved 11 April 2025
- Rehabilitation management plan, dated May 2017, approved 12 May 2017
- Waste rock management plan, V7 dated 19 July 2019 approved 29 August 2019.
- Vegetation management plan, dated May 2017, approved 12 May 2017
- Pollution incident and response management plan, last updated July 2025

The management plans which have not been approved in the past 12 months are currently being reviewed and, where required, subsequent department approval.

The monitoring program is detailed in each respective management plan. An overview of this program is included in Appendix 3 along with plans depicting the key monitoring locations.

3.1.1. Record keeping

All environmental monitoring requirements specified in EPA licences and approvals are undertaken and the data maintained on site in data management systems and readily available. EPL20821 requires that all monitoring records are to be retained for at least 4 years after the monitoring or event to which they relate took place. The record is to include:

- The date(s) on which the sample was taken;
- The time(s) at which the sample was collected;
- The point at which the sample was taken; and
- The name of the person who collected the sample.

Records of all environmental monitoring, audits and actions taken under this EMS are kept on the Environmental Management System. For numerical monitoring data including laboratory results this is held in the cloud hosted environmental database software EQuIS. Field records will be legible, identifiable and traceable to the activity and stored and maintained so that they are readily retrievable and protected against damage, deterioration or loss. All monitoring records will be kept for at least four years after the monitoring or event to which they relate took place.

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| Document : | ENW-001-ST | Issue Date | 02/10/2025 | Version#: 10 Rev0 |
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| Prepared by : | KC | Approved by: | KC | Page 16 of 27 |

3.2. Reporting

DEVELOP is committed to an extensive environmental monitoring reporting and publication schedule, as detailed in Appendix 6. This includes:

- Monthly complaints register
- Quarterly reporting
- Annual Reviews
- EPL Annual Return
- Annual Rehabilitation Reporting

3.3. Auditing and inspections

Separate internal audits may be carried as part of any specific project or activity, or to assess the effectiveness of existing environmental controls and procedures. These audits may be formal or informal and aim to highlight any areas for improvement in environmental risk control.

3.4. Independent Environmental Audit

In accordance with Condition 9, Schedule 6 of the Project Approval DEVELOP will commission and pay the full cost of an Independent Environmental Audit (IEA) to review the environmental performance of the project every three years. The IEA will:

- be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- include consultation with the relevant agencies;
- assess the environmental performance of the Project and assess whether it is complying with the requirements in this approval and any relevant EPL or Mining Lease (including any assessment, plan or program required under these approvals);
- review the adequacy of strategies, plans or programs required under the abovementioned approvals; and
- recommend appropriate measures or actions to improve the environmental performance and rehabilitation of the Project while on care and maintenance or following mine closure.

In accordance with Condition 10, Schedule 6, within six weeks of the completion of this audit, DEVELOP will submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

3.5. Incident reporting

Incidents are managed and tracked through DEVELOPs Environmental Incident Reporting Technical Guideline and Incident Management Procedure (HS-04-P) and as summarised in Figure 3-2 and. The procedure details who is responsible, what documentation is required and personnel that would be involved in an incident investigation for each type of incident. Corresponding investigations and corrective actions assigned as part of the procedure are assigned and tracked in the incident and compliance platform INX.

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| Document : | ENW-001-ST | Issue Date | 02/10/2025 | Version#: 10 Rev0 |
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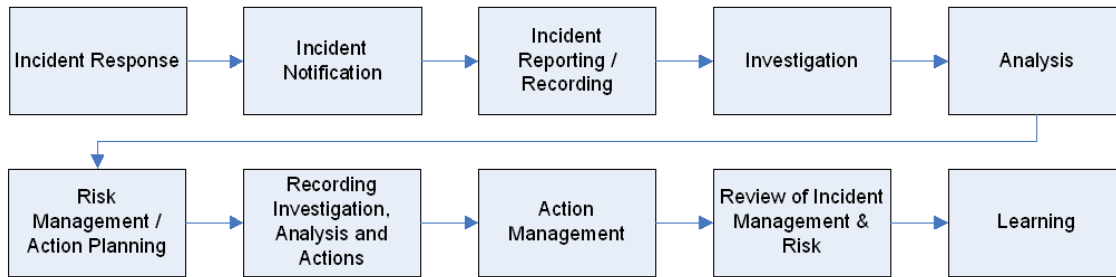


Figure 3-2 Incident Management Process.

HS-04-P considers and defines notifiable, reportable or dangerous incidents including environmental which is broken down into three different levels. The most extreme of which (Level 1) would trigger the additional obligations and notifications as document in the Pollution Incident Response Management Plan (PIRMP, ENW-012-PL0).

3.5.1. External notification procedure

DEVELOP will notify external agencies of environmental related incidents if the thresholds defined in the Incident Management Procedure and Pollution Incident Response Management Plan are triggered or unless otherwise specified in specific management plans, licenses or other approval conditions. External notification of an incident means the following regulatory agencies and timings:

- EPA, within 24 hours, with a detailed written report provided within 7 days
- Department of Planning, Housing and Infrastructure (DPHI), as soon as practicable, with a detailed written report provided within 7 days

3.5.2. Notification of landowners

DEVELOP will notify affected landowners and/or tenants in writing within two weeks of obtaining monitoring results showing:

- an exceedance of any relevant noise criteria in Schedule 4, and provide regular monitoring results to each of these affected parties until the project is again complying with the relevant criteria
- an exceedance of any relevant air quality criteria in Schedule 4 including sending the affected landowners and/ or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).

3.6. Corrective actions and adaptive management

An important component of DEVELOPs EMS is the development of effective Trigger Action Response Plans (TARPs), to allow early detection or prevention of events and actions that may result in material harm to the environment, the mining operation or people. The level of likely impact that may result from the trigger being activated is assessed on a progressive scale which will influence the type of response action proposed. An initial set of TARPs have been developed within each environmental management plan under this EMS and will be regulatory reviewed.

Incidents, non-compliances, non-conformances and any corrective or preventive actions are managed in accordance with the Incident Management Procedure (refer to Section 3.5) and the compliance management and incident tracking platform INX. In the event of criteria

| | | | | |
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| Prepared by : | KC | Approved by: | KC | Page 18 of 27 |

exceedances (as defined in each management plan) DEVELOP will, at the earliest opportunity:

- take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;
- consider all reasonable and feasible options for remediation (where relevant) and submit a report to DPHI describing those options and any preferred remediation measures or other course of action; and
- implement other remediation measures as directed by the Secretary, to the satisfaction of the Secretary

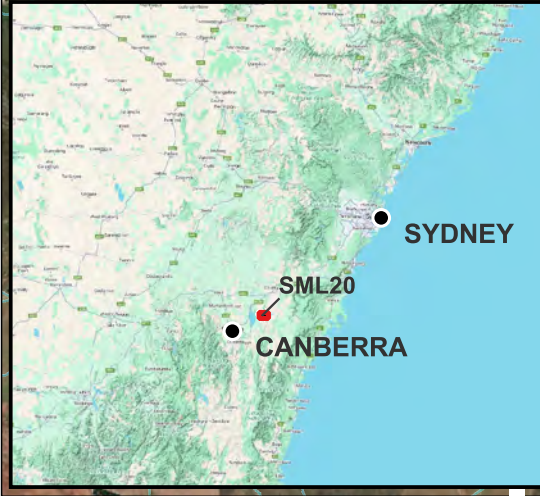
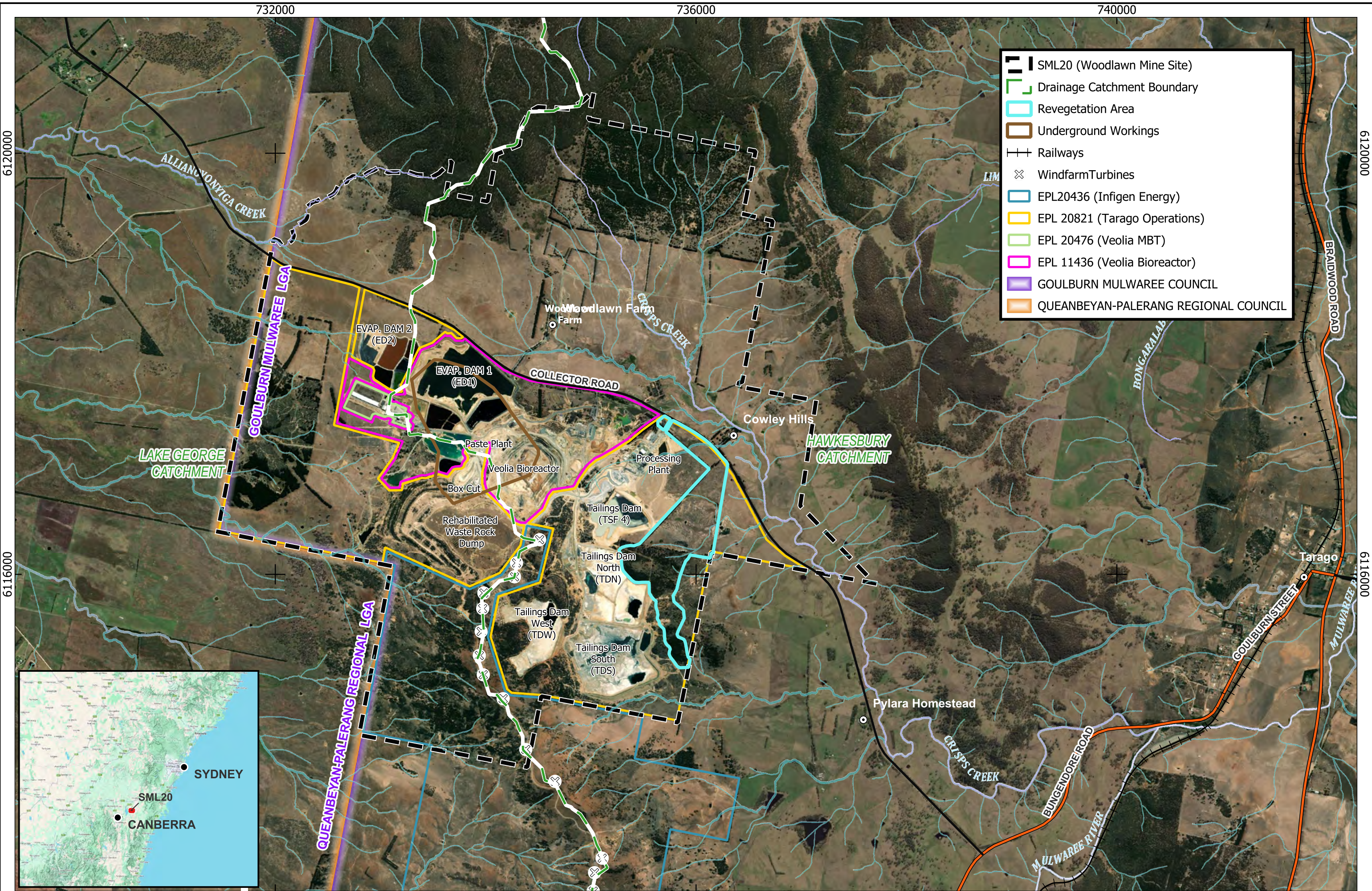
3.7. Review and continuous improvement

This EMS will be reviewed to ensure strategies, plans and programs are updated on a regular basis and incorporate any recommended measures to improve the environmental performance of the Project. As per Schedule 6 Condition 5, DEVELOP will review, and if necessary, revise the EMS within 3 months of:

- the submission of an annual review;
- the submission of an incident report;
- the submission of an audit report; or
- any modification to the conditions of this approval.

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| Prepared by : | KC | Approved by: | KC | Page 19 of 27 |

Appendix 1 Plans



1 2 km

Scale: 1:32,000 MGA94 (Zone 55)

VTX-JOB-0473-MAP-02

Date: 2025-6-26



DEVELOP

Author: C Hobbs

Requested By: K Crook

WOODLAWN ZINC COPPER PROJECT

Site Plan

Appendix 2 Applicable Policies



ENVIRONMENTAL POLICY

DEVELOP Global Limited (DEVELOP) is committed to managing its activities in an environmentally responsible manner. Through effective management practices, DEVELOP aims to ensure activities have a minimum impact on the environment.

DEVELOP will:

- **Implement** and maintain an environmental management system to identify, assess and minimise environmental risk at all stages of its operations as a fundamental part of its long-term strategy.
- **Comply** with all applicable legal and statutory requirements which we subscribe as a minimum standard.
- **Engage** Stakeholders on their concerns, aspirations and values regarding the development, operation and closure aspects of our projects.
- **Communicate** our policy and environmental performance in an open, transparent and accurate manner.
- **Minimise** the environmental impacts of our operations through the efficient use of natural resources and the reduction of input materials and waste.
- **Monitor** our environmental footprint and risk through the measurement and reporting of environmental performance.
- **Ensure** that its Employees and Contractors are fully aware of this policy and their environmental responsibilities at all stages of the Company's activities and operations.

MICHAEL BLAKISTON
Chairman

1 October 2021
COR-002-Po



STAKEHOLDER RELATIONS POLICY

DEVELOP Global Limited (DEVELOP) believes that the support and endorsement of its activities by the communities in which it operates is fundamental to the long-term success of its business.

DEVELOP will:

- Develop, implement and maintain management systems to identify, assess and manage impacts on the community at all stages of its operations as a fundamental part of its long-term strategy.
- Recognise that communities are comprised of internal and external Stakeholders.
- Establish communication, consultation and participation processes to develop lasting and beneficially interactive relationships built on mutual respect and trust.
- Recognise that each community is different and seek to respect the culture, human rights, values and traditions of those communities in which it seeks to operate.
- Be open and honest in describing the impacts of any mining activities.
- Encourage and provide opportunities for communities to share in the benefits which flow from mining activities including employment, education and health initiatives.
- Commit to sustainable development so that the social and economic benefits obtained by communities are safeguarded in the long-term.
- Ensure that its Employees and Contractors are informed about this policy and made aware of their community responsibilities in relation to all stages of the Company's activities and operations.
- Require all Contractors to comply with this policy.
- Comply with this policy as well as any applicable laws and regulations.
- Monitor, continuously improve and publicly report our Stakeholder relations performance.

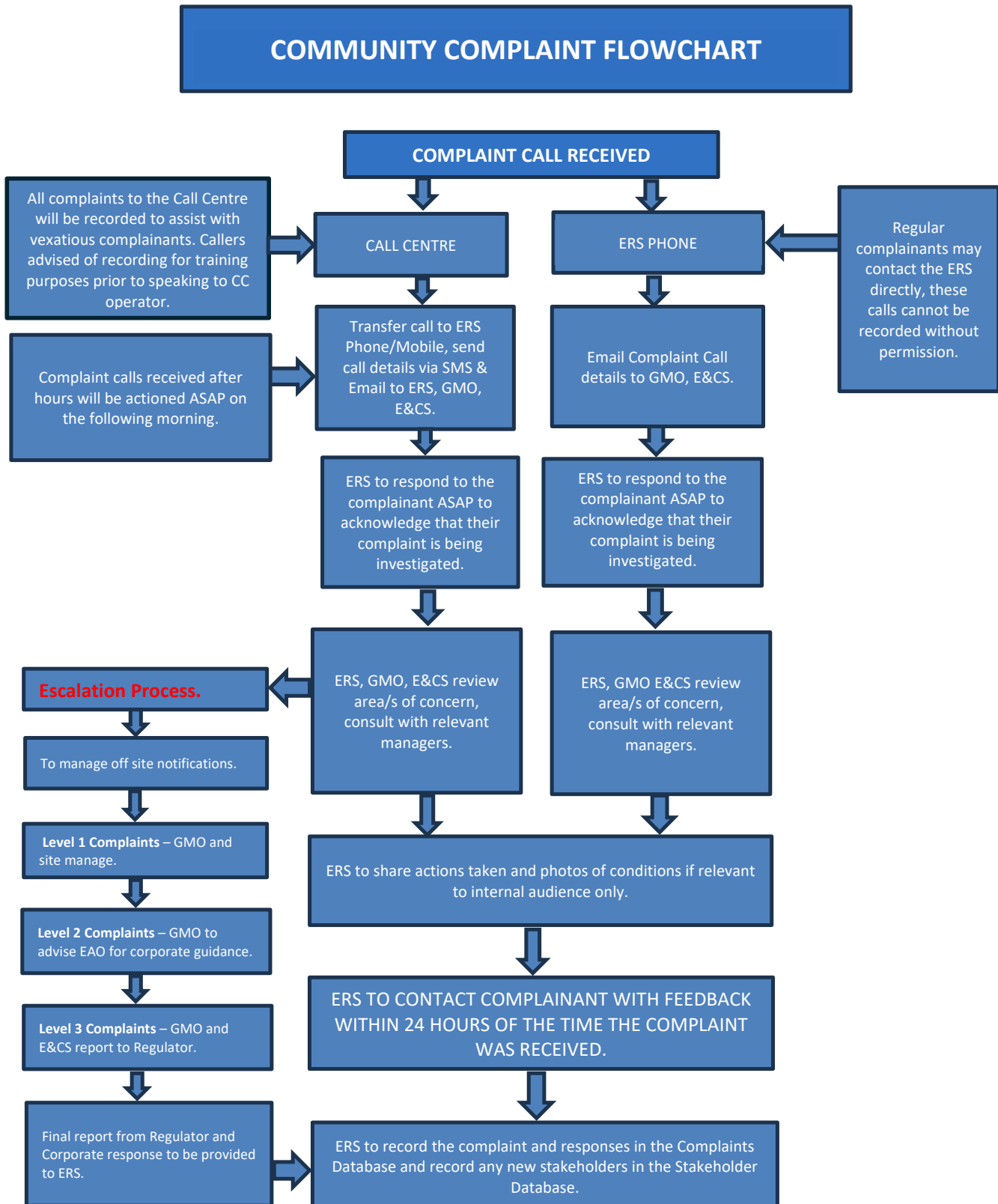
MICHAEL BLAKISTON
Chairman

1 October 2021
COR-003-Po

Appendix 3 Consents, leases, licenses and permits

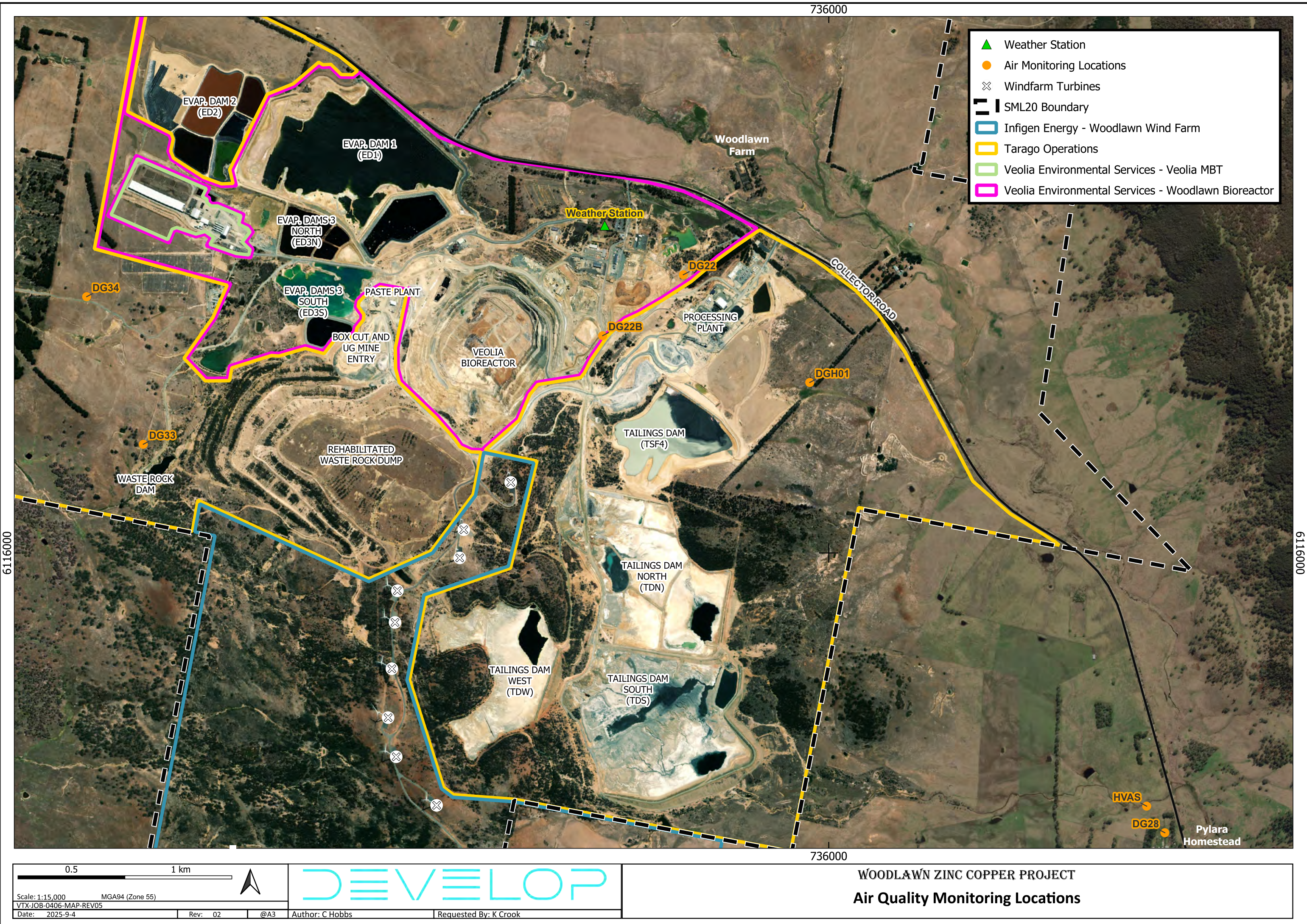
| Number | Issue date | Expiry date | Details |
|---|------------|--|--|
| NSW Department of Trade and Investment Resources and Energy | | | |
| S(C&PL)L0020 | 31/10/1973 | 16/11/2029 | Special (Crown and Private Lands) Lease 20 (known as SML20). Established under the Mining Act 1963. 0.2368 km2 |
| Department of Planning, Infrastructure and Environment | | | |
| MP07_0143-PA-17 | 04/07/2013 | 04/07/2034 | TriAusMin Woodlawn Mine Project Approval |
| MP07-0143MOD1 | 22/04/2016 | for the period of the original consent | Modification of the PA for the relocation of Mine Portal and Overland Haul road |
| MP07-0143 MOD2 | 06/07/2017 | for the period of the original consent | Site Layout Update |
| Environment Protection Authority (EPA) | | | |
| EPL20821 | 22/09/2023 | Next review due 29/03/2027 | First issued 29/03/2017 |
| 5110694 | 20/10/2022 | 20/10/2025 | Radiation license |
| Department of Primary Industries - Water | | | |
| WAL28983 | Unknown | Continuous | Held by Veolia under agreement with Tarago Operations, extraction of 600ML/a from Lachlan Ford Belt |
| WAL42034 | 17/08/2018 | Continuous | Extraction of 0 ML/a from Goulburn Fractured Rock Groundwater Source |
| WAL42366 | 17/05/2019 | Continuous | Extraction of 400ML/a from Goulburn Fractured Rock Groundwater Source |
| Dam Safety NSW | | | |
| Woodlawn-1 | April 2017 | 30/06/2025 | Approval to Extract within Woodlawn Notification Area |
| Woodlawn-2 | April 2017 | 30/06/2025 | Approval to Conduct Hydraulic Mining in Woodlawn South Tailings Dam |
| Woodlawn-3 | 16/07/2025 | 30/06/2040 | Extension of Woodlawn-1 |
| SafeWork | | | |
| XSTR200095 | 15/12/2023 | 30/08/2028 | License to Store Explosives |

Appendix 4 Community Complaint Flow Chart



Appendix 5 Overview of the Environmental Monitoring Program

| Monitoring type | Parameter monitored | Monitoring location | Minimum monitoring frequency |
|----------------------------------|---|--|---|
| Air Quality Management Plan | | | |
| Meteorological | Wind speed and direction, rainfall, temperature at 2m and 10m, barometric pressure, relative humidity and solar radiation | Eco-Precinct | Hourly |
| Deposited dust | Total insoluble matter (g.m ² /month), ash content (g.m ² /month) | DG34, DG33, DG22, DG22B, DGH01, DG28 | Monthly |
| Total suspended particulate | Total suspended particulate (TSP) | HVAS | 24 hours every 6 days |
| Particulate matter | <10um (PM10) | HVAS | 24 hours every 6 days |
| Noise Management Plan | | | |
| Attended monitoring | LAeq(15min), LA1(1min) | Nearest sensitive receptor/s | Monthly (when operational) |
| Blast Management Plan | | | |
| Air blast overpressure | dB (Lin Peak) | NA | Not currently required: no surface blasting |
| Ground vibration | mm/s | Bioreactor wall, ED1, internal reference site | Constant |
| Water Management Plan | | | |
| Groundwater | Water level, field parameters, laboratory analytes (refer to water management plan) | Various, as per plan | Quarterly to bi-annually |
| Groundwater | Standing water levels only | Various, as per plan | Monthly |
| Surface water | Field parameters, laboratory analytes (refer to water management plan) | Various, as per plan | Quarterly to bi-annually |
| Dewatering bore | Field parameters, laboratory analytes (refer to water management plan) | The holding dam where the water from the bore is being pumped to | Monthly (if dewatering is occurring) |
| Waste Rock Management Plan | | | |
| Waste rock – laboratory analysis | Net Acid Production Potential, Net Acid Generation | NA – locations not fixed | Various, refer to plan |
| Vegetation Management Plan | | | |
| Landscape Function Analysis | Various ecological and plant health parameters (refer to plan) | Various, as per plan | Bi-annual |



- ▲ Weather Station
- Air Monitoring Locations
- ⊗ Windfarm Turbines
- ▬ SML20 Boundary
- ▭ Infigen Energy - Woodlawn Wind Farm
- ▭ Tarago Operations
- ▭ Veolia Environmental Services - Veolia MBT
- ▭ Veolia Environmental Services - Woodlawn Bioreactor

0.51 km

Scale: 1:15,000
VTX-JOB-0406-MAP-REV05
Date: 2025-9-4

Rev: 02

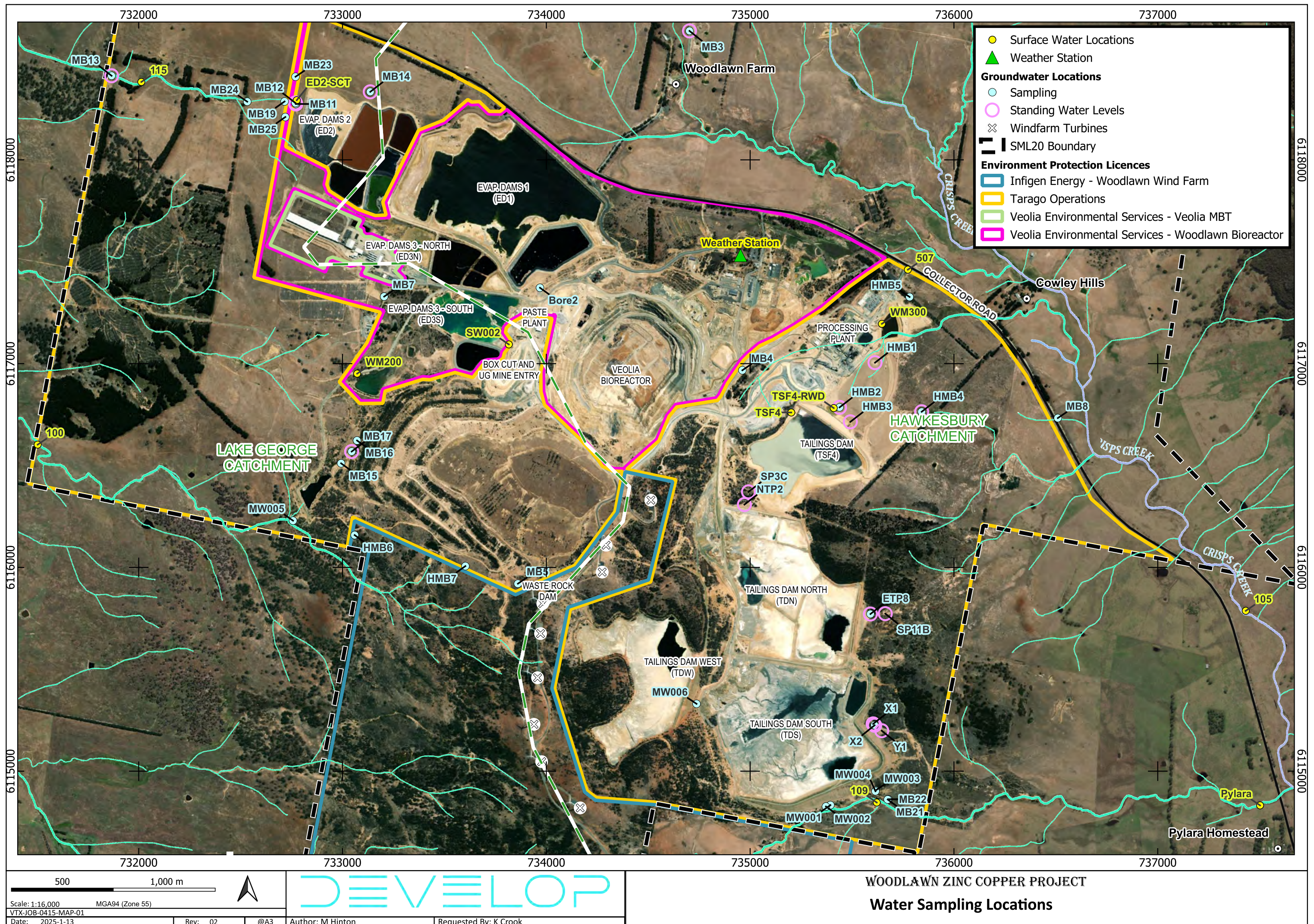
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Author: C Hobbs

Requested By: K Crook

DEVELOP

WOODLAWN ZINC COPPER PROJECT
Air Quality Monitoring Locations



Appendix 6 Reporting Requirements

| Report | Activities covered | Details | Distribution |
|--------------------------------|--|--|---|
| Annual Review | 1 July – 30 June | <ul style="list-style-type: none"> As per the State significant mining developments Annual Review Guideline, 2015. Provide an analysis of the environmental monitoring data collected during the reporting period and compare these with the stated objectives and targets. As per Schedule 6, Condition 4. Planned works for subsequent year Due within 28 days after the end of the reporting period. | <ul style="list-style-type: none"> Uploaded to the Major Projects Portal Uploaded to the DEVELOP website |
| Independent Audit | Previous audit to 30 June (every 3 years) | <ul style="list-style-type: none"> As per State significant mining developments: Independent Audit Guideline (2015) by Secretary approved people In accordance with Schedule 6, Condition 9 Due every 3 years from the first audit completion (August 2018) commencement of project construction (September 2017) | <ul style="list-style-type: none"> Uploaded to the Major Projects Portal Uploaded to the DEVELOP website |
| Annual Rehabilitation Report | 1 July – 30 June | <ul style="list-style-type: none"> Updated reporting timeline as approved by Resources Regulator in June 2025 A description of the rehabilitation undertaken over the annual reporting period and progress towards rehabilitation objectives. Due 60 days after the last annual reporting period | <ul style="list-style-type: none"> Submitted to the Regulator via the Resource Regulator Portal Uploaded to the DEVELOP website |
| Rehabilitation Forward Program | 1 July – 30 June | <ul style="list-style-type: none"> Updated reporting timeline as approved by Resources Regulator in June 2025 3 year forward program A schedule of mining activities and summary of the spatial progression | <ul style="list-style-type: none"> Submitted to the Regulator via the Resource Regulator Portal Uploaded to the DEVELOP website |
| 6 Monthly Dewatering Report | 6 months from dewatering starting | <ul style="list-style-type: none"> Results of monthly dewatering testing. Due 6 months after dewatering resumes and every following | <ul style="list-style-type: none"> NSW EPA (via email) |
| Annual Return | 29 March – 28 March | <ul style="list-style-type: none"> Due no later than 60 days after the anniversary date of the license | <ul style="list-style-type: none"> Completed online via the NSW EPA portal |
| Quarterly Report | Q1: Jul – Sep Q2: Oct - Dec Q3: Jan - Mar Q4: Apr – Jun | <ul style="list-style-type: none"> EPL monitoring results and meteorological data for each quarter and comparison to any specified limits | <ul style="list-style-type: none"> Uploaded to the DEVELOP website following receipt of all monitoring results |