

Department of Water and Environmental Regulation

Annual Audit Compliance Report Form*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L8435/2010/3	Licence file number:	2011/000299-3
Licence holder:	GSM Mining Company Pty Ltd		
Trading as:	GSM Mining Company Pty Ltd		
ACN:	165 235 030		
Registered address:	Level 4, 235 St Georges Terrace, Perth, Western Australia, 6000		
Reporting period:	01/01/2025 to 31/12/2025		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> • section C; • section D if required; and • sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> • section C; • section D if required; • section E; and • sign the declaration at Section F.

Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
5 – Processing or beneficiation of metallic or non-metallic ore	1,341,879 tonnes/year
33 – Chemical blending or mixing	2,569 tonnes/year
52 – Electric power generation (25 MW Diesel)	458 MWh
52 – Electric power generation (40 MW LNG)	164,098 MWh
73 – Bulk storage of chemicals	3,095 m ³

Department of Water and Environmental Regulation

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
6 – Mine Dewatering	6,141,625 kL/year <i>Discharge at the Eastern discharge point W3 did not commence in the reporting period</i>
54 – Sewage facility	145 m ³ /day
64 – Class II putrescible landfill	1,518 tonnes/year
Supporting documentation is provided in Attachment 1 .	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 28	Date(s) of non-compliance:	Q1-4 2025
Details of non-compliance:			
<p>The following monitoring bores were partially non-compliant with the monitoring schedule outlined in Table 16 of the license. Standing Water Levels were not recorded for the below bores:</p> <ul style="list-style-type: none"> • MB32S – Dry in Quarter 1 and 4 • MB40D – Blocked in Quarter 3 • MB64D – Pump blocked in Quarter 3 <p>Water quality samples were not collected for the below bores in the specified sampling period.</p> <p>A map outlining the locations and summary of partial non-compliance has been provided in Attachment 2.</p>			
Monitoring Bore	Description	Period	
MB30D	Sample was not collected due to broken tubing	Q4	
MB31D	Sample was not collected due to broken tubing	Q1	
MB32S	Q1, Q3 and Q4 – bore dry; Q2: bore blocked and unable to collect sample.	Q1, Q2, Q3, Q4	
MB37D	Missed annual water sample due to blocked bore	Q1	
MB38D	Quarterly sample missing, pump stuck in bore	Q1	
MB40D	Q1: no access due to flooding; Q2-Q3: bore blocked due to stuck pump.	Q1, Q2, Q3,	
MB46S	Bladder pump stuck in bore, unable to retrieve sample	Q2, Q3	
MB46I	Quarterly sample not taken. Bore casing blocking bore	Q3	
MB46D	Quarterly sample not taken. Fittings are broken.	Q4	
MB48I	Quarterly sample missing, pump stuck in bore	Q1	

Department of Water and Environmental Regulation

MB48D	Quarterly sample missing, pump stuck in bore	Q1
MB56S	Quarterly sample missing, bore blocked	Q1, Q2, Q3
MB56I	Q1: Contaminated at surface, broken at collar; Q2-4: Bore blocked, unable to sample.	Q1, Q2, Q3, Q4
MB63I	Quarterly sample missing. Fittings are broken.	Q4
MB64D	Water quality sample not taken due to pump blocking the bore.	Q1, Q2, Q3, Q4
MB74	Water quality sample could not be taken due to equipment failure, for single month in February, otherwise sampled to schedule	Q1
MB75	Water quality sample could not be taken due to equipment failure, for single month in February, otherwise sampled to schedule.	Q1
MB77	Water quality sample could not be taken due to equipment failure, for single month in February, otherwise sampled to schedule.	Q1
MB78	Water quality sample could not be taken due to equipment failure, for single month in February, otherwise sampled to schedule As reported to DWER via email notification, MB78D had a higher SWL than that of MB78S (for more than a 3-month period) for Quarters 1, 2 and 4.	Q1, Q2, Q4

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

There is no suspected environmental impact as a result of the non-compliances.

While data gaps occurred, sufficient adjacent monitoring data was available to maintain oversight of groundwater trends, and no trigger exceedances were identified in compliant locations.

Cause (or suspected cause) of non-compliance:

The primary cause of noncompliance was due to equipment failure, inclement weather conditions preventing access, or the bore being blocked and requiring servicing.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Faulty monitoring equipment was removed and sent to the manufacturer for repair. Where possible, alternate equipment was used to continue monitoring at accessible locations.

A maintenance program has been developed in 2025 for the affected bores and is scheduled for Quarter 2, 2026. This program will address blocked or damaged infrastructure and confirm which bores which may require replacement.

The monitoring schedule and bore register have also been reviewed to ensure equipment condition and access constraints are identified earlier and managed proactively where practicable.

Department of Water and Environmental Regulation

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 29/12/2025 Email notification to DWER outlining minor non-compliance to MB78.

Section E – Details of Non-Compliance with Licence Condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	23	Date(s) of non-compliance:	September, 2025
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Details of non-compliance:

The following surface water discharge locations were non-compliant with the monitoring schedule outlined in Table 12 of the licence:

- W1 & W2: water quality samples were taken at a 3-monthly interval rather than the 2-monthly, as required in the licence from Q3 2025. This was rectified for Q4 2025.

A map outlining the locations and summary of partial non-compliance has been provided in **Attachment 3**.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

There is no suspected environmental impact of the non-compliance; the surface water discharge locations were subsequently sampled in October 2025 and follow the two monthly schedule for the remainder of the reporting period.

Cause (or suspected cause) of non-compliance:

An internal audit of compliance to licence obligations completed in October 2025 identified that updated monitoring schedule in Condition 23, which came into effect on 29 July 2025, to include a two-monthly sampling period for W1, W2, and W3, as opposed to the historical quarterly sampling, had been missed when updating the monitoring schedule used to track compliance obligations.

As a sample had been taken in August, and the audit identified the missed sample in October, there was only one missed sample, the sample for September 2025.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

An internal audit and change management process has been initiated to review all amendments to licence obligations as they are received, with management of change process to capture any changes required to monitoring schedules and alerts in the database where specific limits or conditions have been placed.

The sampling schedule has been updated to reflect the changes in Table 12, and internal alerts

Department of Water and Environmental Regulation

have been established in monitoring software for the appropriate limits; both warning and breach.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

Section E – Details of Non-Compliance with Licence Condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	25	Date(s) of non-compliance:	Q1-4 2025
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Details of non-compliance:

The following monitoring bores were partially non-compliant with the monitoring schedule outlined in Table 13 of the license. Please note that the below bores were only partially non-compliant. Surface Water Levels were recorded each quarter for all bores except for the list below:

- GMB1 – Q1, Q2 and Q3
- GMB3 – Q4
- GMB4 – Q1

A map outlining the locations and summary of partial non-compliance has been provided in **Attachment 4**.

Monitoring Bore	Non-Compliance	Period
GMB01	Water sample not taken due to pump being stuck in bore.	Quarter 1, Quarter 2, Quarter 3.
GMB03	Water sample not taken due to pump being broken/stuck in bore.	Quarter 4
GMB04	Bore was not accessible for sampling during the reporting period.	Quarter 1

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

No adverse environmental impacts were identified as a result of the missed monitoring events. Monitoring at surrounding and adjacent bores continued in accordance with the licence, and no exceedances of trigger values were recorded at compliant monitoring locations during the reporting period.

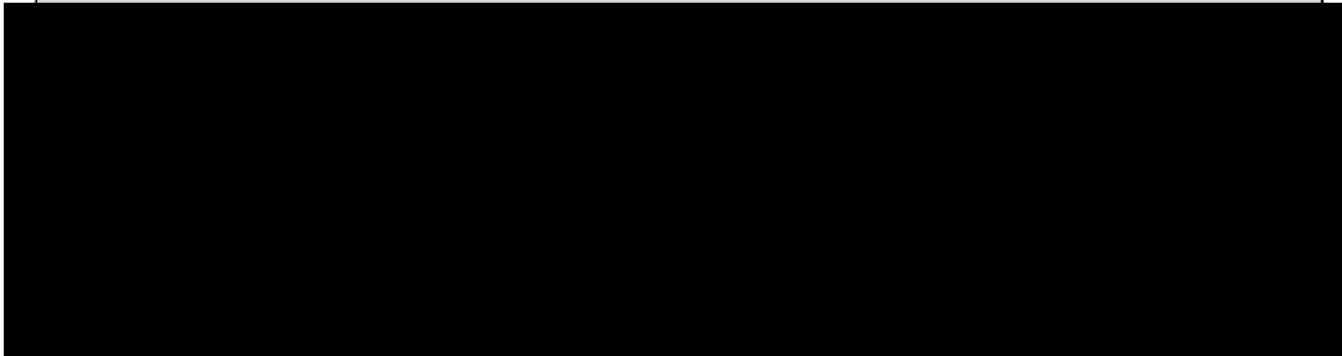
While data gaps occurred at the bores listed above, sufficient monitoring coverage remained to assess groundwater trends across the network.

Department of Water and Environmental Regulation

Cause (or suspected cause) of non-compliance:	
The non-compliances were primarily due to bore infrastructure issues, including pumps becoming lodged within the bore casing and restricted access preventing sampling.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
A targeted maintenance program was developed in 2025 and is scheduled for Quarter 2 2026. This program includes removal and replacement of lodged or faulty pumps (where possible), assessment of bore integrity, and identification of any bores requiring replacement.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date:

Section F – Declaration

I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.



Date:	28/02/2026	Date:	28/02/2026
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.