

West Musgrave Copper and Nickel Project

Compliance Assessment Report - Ministerial Statement 1188

July 2026

Rev	Originator	Checked by	Approved by	Signature	Date
0	Danie Richter – Environment Specialist (West Musgrave)	Josh Levett – Superintendent Environment Nadine Kroucamp – Superintendent Approvals	James Ellen		17 July 2026

Purpose

OZ Minerals Musgrave Operations Pty Ltd (OZ) is the proponent of the West Musgrave Copper and Nickel Project (WMP), which is currently in temporary suspension. OZ Minerals Musgrave Operations Pty Ltd (ABN 39 640 213 341) is wholly owned by BHP Group Limited, a company listed on the Australian Stock Exchange (ASX) (ASX: BHP).

This Compliance Assessment Report - MS 1188 for the West Musgrave Copper and Nickel Project has exclusively been prepared for submission to the Government of Western Australia's Department of Water and Environment Regulation (DWER).

Forward Looking Statements

This Document includes "forward-looking statements". These statements relate to expectations, beliefs, intentions or strategies regarding the future. These statements are identified by the use of words like "anticipate," "believe," "estimate," "expect," "intend," "may," "plan," "project," "will," "would," "should," "seek," and similar expressions. The forward-looking statements reflect views and assumptions concerning future events as of the date of this Document and are subject to future conditions, and other risks and uncertainties, including but not limited to economic and political conditions and sovereign risk. Any forward-looking statements are subject to various risk factors that could cause the project's actual results to differ materially from the results expressed or anticipated in these statements. Such statements are not guarantees of future performance and involve known and unknown risks, uncertainties, assumptions and other important factors (including the risks set out in this document), many of which are beyond the control of OZ and its directors and management. OZ does not give any assurance that the results, performance or achievements expressed or implied by the forward-looking statements contained in this Document will actually occur and cautions individuals not to place undue reliance on these forward-looking statements. OZ has no intention of updating or revising forward-looking statements, regardless of whether new information, future events or any other factors affect the information, contained in this Document, and which may affect the finding, or projections contained in this document, except where required by law. All sections in this Document should be viewed in the context of the entire Document.

Note On Currency

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1. INTRODUCTION

1.1 Background

OZ Minerals Musgrave Operations Pty Ltd (OZ) is the proponent of the West Musgrave Copper and Nickel Project, referred to as the West Musgrave Project (WMP) or the project. The operator of the WMP is OZ Minerals Musgrave Operations Pty Ltd (ABN 39 640 213 341), and is wholly owned by BHP Group Limited, a company listed on the Australian Stock Exchange (ASX) (ASX: BHP). In response to a downturn in the global nickel market BHP placed all its Western Australia Nickel (WAN) operations, including the WMP, into temporary suspension in December 2024.

The WMP is located in the West Musgrave Ranges of Western Australia approximately 1,300 km north-east of Perth near the intersection of the borders between Western Australia, South Australia and the Northern Territory. The WMP is within the Ngaanyatjarra Native Title determination, and Class A Reserve No. 17614 (for the Use and Benefit of Aboriginal Inhabitants). The nearest towns include the Indigenous Communities of Jameson (Mantamaru) 26 km north, Blackstone (Papulankutja) 50 km east, and Warburton (Milyirrtjarra) 110 km west of the project (see Figure 1).

If the project recommences operations, it has an expected life of approximately 26 years, and will consist of:

- Mining of copper and nickel ore from two open cut mine pits using conventional blast, load and haul methods.
- Placement of mine waste into permanent Waste Rock Dumps (WRDs) and dedicated Tailings Storage Facility (TSF) adjacent to mine pit voids.
- Milling and processing of ore using dry grinding (Vertical Roller Mills (VRM)) and flotation to produce separate copper and nickel concentrates.
- Permanent electric power generation facility using a combination of renewable power infrastructure (solar photovoltaic panels, wind turbines and battery energy storage) supported by thermal (fossil fuel) power generation.
- Development of a process/potable water supply borefield that may include a combination of overland and/or underground pipelines for use during construction and operations.
- Miscellaneous infrastructure, including stormwater management infrastructure (bunds and drains), internal roads and service tracks, a dedicated site access road, accommodation village/s (approximately 350 beds during operations (Living Hub) and 1,100 during construction (including Construction Village)), aerodrome, wastewater treatment, landfill and other supporting infrastructure including offices, warehouses and workshops.
- Concentrate will be transported to Esperance via existing roads and rail networks.

A summary of the key project characteristics is presented in Table 1.

Table 1: Key Project Characteristics

Elements	Location	Proposed Extent Authorised
Physical Element		
Mine and associated infrastructure	Error! Reference source not found.	Clearing of up to 4,213.3 ha of native vegetation within a Development Envelope of 21,680 ha.
Operational Element		
Mining voids	Error! Reference source not found.	- Below water table mining - Nebo pit void to be backfilled above water table post-closure - Babel pit void to be a permanent and episodic pit lake post-closure
Mineral processing plant (MPP)	Figure 2	- Processing of up to 13.5 million tonnes of metallic ore through: - Primary and secondary crushing - Grinding - Flotation, product and waste circuits - Concentrate storage - Water storage infrastructure
Mining waste (waste rock)	Error! Reference source not found.	Placement of waste rock into permanent WRDs
Ore processing waste (tailings)	Error! Reference source not found.	Disposal of tailings into a TSF and/or Nebo pit void
Temporary electric power generation facility	Error! Reference source not found.	Up to 60 MW (instantaneous load requirement) of fossil fuel electricity generation.
Permanent electric power generation facility	Error! Reference source not found.	- Up to 60 MW (instantaneous load requirement) of fossil fuel electricity generation. - Up to 100 MW of solar photovoltaic electricity generation. - Up to 100 MW of wind turbine electricity generation. - Up to 100 MW of battery energy storage.
Water supply	Error! Reference source not found.	Abstraction of up to 7.5 GL/a of groundwater from the borefield and through dewatering



Figure 1: Site Location

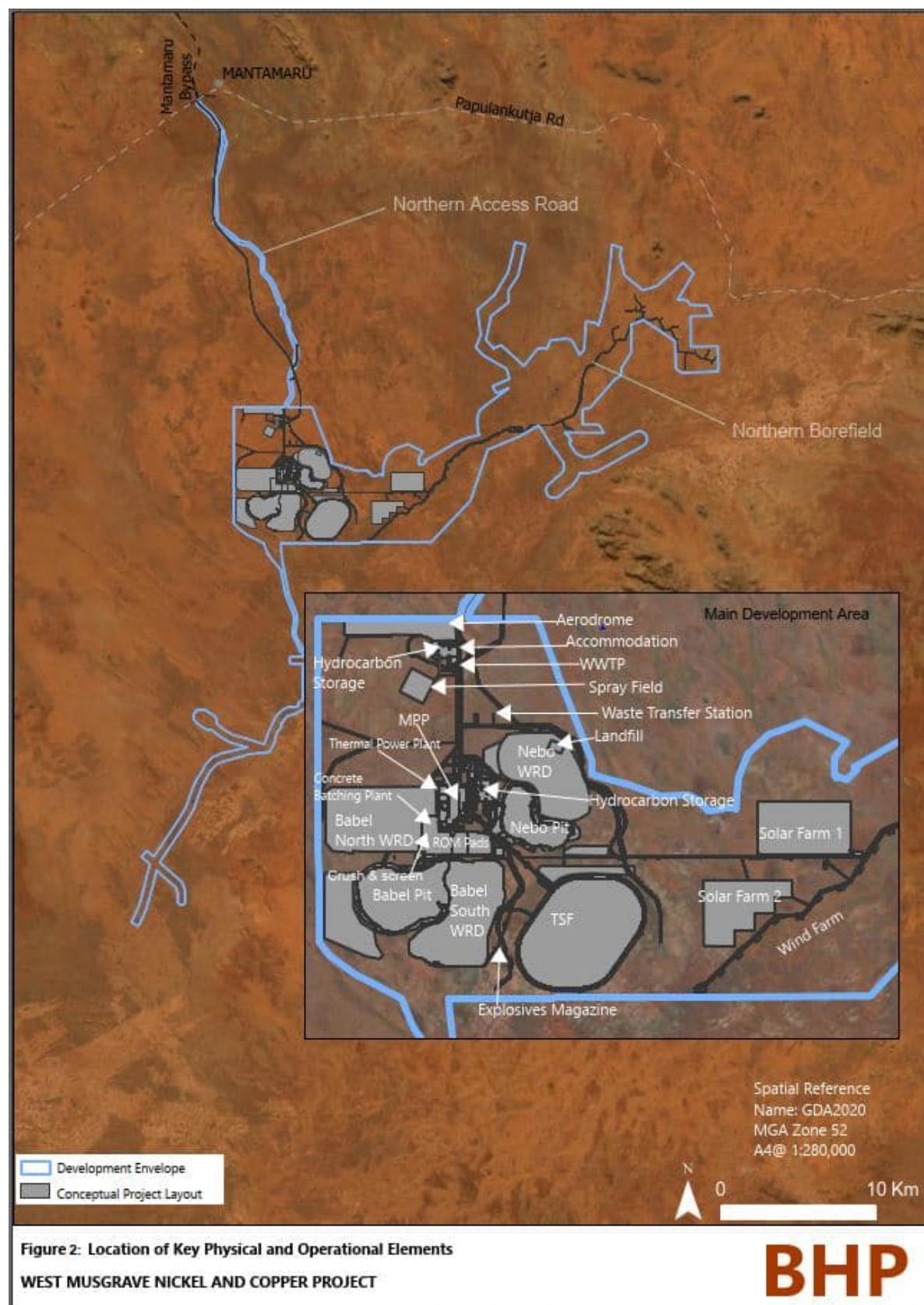


Figure 2: Location of Key Physical and Operational Elements

2. AUDIT PURPOSE AND METHODOLOGY

2.1 Purpose

This report addresses the status and compliance of the WMP with the conditions outlined in Ministerial Statement 1188 and has been prepared in accordance with the EPA Services *Post Assessment Guideline for Preparing a Compliance Assessment Report* (August 2012).

Compliance reporting is required under Ministerial Statement 1188 (Condition 10-6). As per requirements of Condition 10-1, a Compliance Assessment Plan (CAP) was submitted to the CEO of DWER on 19 October 2022 and was approved on 18 November 2022. The CAP provides the basis for this assessment.

This report is the fourth Compliance Assessment Report (CAR) submitted for the WMP to satisfy Condition 10-6 of Ministerial Statement 1188. It covers the reporting period from 21 April 2025 to 20 April 2026.

2.2 Methodology

An internal audit was undertaken by the WMP Environment Specialist, with support from the Approvals and Governance, Country Engagement and Indigenous Engagement teams.

The methodology consisted of the following steps:

- Compilation of audit tables for MS 1188 and the following management plans, utilising the audit tables approved under the approved CAP:
 - o Cultural Heritage Management Plan (CHMP) Rev3
 - o Flora Vegetation Management Plan Rev 1
 - o Groundwater Management and Monitoring Plan Rev 3a
 - o Terrestrial Fauna Management Plan Rev 1.
- Verification of the audit tables against the contents of the management plans and against the requirements of the CAP was conducted on a sampling basis.
- Preparation of a CAR template and verification against the requirements of the CAP.
- Assessment of each condition of MS 1188 by reviewing available information to support assessments of compliance or non-compliance.
- Recording the finding and the location of the supporting evidence in the audit tables (e.g. on document management system, spatial database, etc).
- Filing of evidence and communications within the BHP document management system for verification and auditing purposes.
- Internal review and clarification of draft findings, including the assessment of additional information, and updating of the audit tables.
- Communication of any detected non-compliances to the CEO via the formal CAR covering email with letter attachment, where not previously communicated.
- Preparation of the summary report and the Statement of Compliance.

3. IMPLEMENTATION STATUS

As reported in the 2025 CAR, the construction of the WMP stopped in October 2024 and entered Temporary Suspension in December 2024.

Since 1 December 2024, a temporary suspension team is on site and responsible for maintaining compliance with statutory approvals and the maintenance of assets to preserve and maintain options for future development of the project. The activities of the temporary suspension team include:

- Maintenance and preservation of constructed and stored assets, predominantly consisting of components and equipment for the partially constructed MPP, living hub and water infrastructure.
- Operation and maintenance of installed infrastructure and utilities, including:
 - o construction power supply (individual gen-sets at buildings and utilities),
 - o reverse osmosis water treatment,
 - o effluent treatment (DoH approved recycled water scheme),
 - o communications towers and weather stations,
 - o roads and tracks, and
 - o construction accommodation village.
- Operation of a CASA certified aerodrome.
- Monitoring of groundwater, depositional dust, feral fauna, weeds and recycled water in accordance with the conditions of MS1188 and other statutory approvals.
- Ongoing on-country engagement with Traditional Owners as required under the Mining Agreement, including their involvement in ongoing heritage and fauna surveys, the monitoring of activities in the vicinity of heritage values, and recently involvement in a skills building programme.

4. AUDIT FINDINGS

The audit assessed compliance over the 12-month reporting period from 21 April 2025 to 20 April 2026. It is the fourth CAR submitted for the WMP to satisfy Condition 10-6 of Ministerial Statement 1188 and the first CAR where the project has been in temporary suspension for the full reporting period. The assessment found that the WMP is generally compliant with the requirements of MS 1188, and that the implementation of the Project is in accordance with the approved CHMP, FVMP, GMMP, TFMP and Greenhouse Gas Management Plan Rev 3 (GHGMP). Details of the assessment outcomes, including instances of non-compliance with requirements, are provided in the following sections.

4.1 Ministerial Statement 1188

Details of compliance with MS 1188 are provided in the Audit Table in Appendix 1.

Two non-compliances were recorded against Condition 5-8 and 10-6 of Ministerial Statement 1188 respectively, as described below and summarised in Table 2.

4.1.1 Non-compliance with Condition 5-8

Condition 5-8(2) specifies that BHP shall make the annual Greenhouse Gas report required under Condition 5-2 publicly available within two weeks of the report being submitted to the CEO. The report was not made available on the BHP Website within the specified period. This has since been corrected.

Notification of this non-conformance is included in the covering letter to this CAR.

4.1.2 Non-compliance with Condition 10-6 (4)

Condition 10-6 (4) specifies that BHP shall make the Compliance Assessment Report publicly available in accordance with the approved Compliance Assessment Plan. The 2025 CAR was not made publicly available by publishing it on the BHP Website. This has since been corrected.

Notification of this non-conformance is included in the covering letter to this CAR.

4.2 Management Plans

One non-compliance with the management measures or commitments contained in the approved management plans endorsed under MS 1188 occurred during the reporting period. The non-compliance is described below and detailed in the relevant audit table.

Conditions 2-3, 3-3, 4-3 and 6-3 of MS 1188 require implementation of the following management plans:

4.2.1 Condition 2-3: Cultural Heritage Management Plan (CHMP)

Assessment outcomes for the approved CHMP are provided in Appendix 2. No non-compliances with the requirements of the CHMP were recorded during this assessment

4.2.2 Condition 3-3: Flora and Vegetation Management Plan (FVMP)

Assessment outcomes for the approved FVMP are provided in Appendix 3. No non-compliances with the requirements of the FVMP were recorded during this assessment.

4.2.3 Condition 4-3: Groundwater Monitoring and Management Plan (GMMP)

Assessment outcomes for the approved GMMP are provided in Appendix 4. One non-compliance with the requirements of the GMMP was recorded during this assessment. As detailed below, this is a repeat of the non-compliance recorded during the previous two review periods.

GMMP NC 1

Section 2.6.1 of the GMMP specifies “In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, OZ Minerals will report in accordance with the requirements of the relevant Ministerial Statement Condition(s)”.

As was reported in the 2024 and 2025 CARs, results obtained from regular groundwater baseline monitoring at bore BMB10-D (now renamed NWMGW-BMB10 Deep) indicate that the measured Electrical Conductivity (EC) consistently exceeds the defined trigger values (and intermittently above the threshold value), indicating there are statistical limitations in the baseline range as there is no project activity in its vicinity. A map indicating the location of the bores in question has been appended to the Statement of Compliance (Appendix 5 of this CAR).

This non-compliance will be addressed in the next review of the GMMP.

Notification of this non-conformance is included in the covering letter to this CAR.

4.2.4 Condition 6-3: Terrestrial Fauna Management Plan (TFMP)

Assessment outcomes for the approved TFMP are provided in Appendix 5. No non-compliances with the requirements of the TFMP were recorded during this assessment.

4.3 Summary of non-compliances

Non-compliances with requirements of MS1188 and the management plans are summarised in Table 2. It is noted that the non-compliances are administrative in nature and have not resulted in environmental harm,

Table 2 -Summary of Audit Non-Compliance Findings

Reference	Condition	Non-compliance Finding
MS1188 Condition 5-8	Condition 5-8(2) specifies that BHP shall make the annual Greenhouse Gas report required under Condition 5-2 publicly available within two weeks of the report being submitted to the CEO.	The report was not made available on the BHP Website within the specified period. This has since been corrected. Notification of this non-conformance is included in the covering letter to this CAR.

Reference	Condition	Non-compliance Finding
MS1188 Condition 10-6	Condition 10-6 (4) specifies that BHP shall make the Compliance Assessment Report publicly available in accordance with the approved Compliance Assessment Plan.	The 2025 CAR was not made publicly available by publishing it on the BHP Website. This has since been corrected. Notification of this non-conformance is included in the covering letter to this CAR.
MS1188 Condition 4-5 In the event that monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the Groundwater Monitoring and Management Plan, which is confirmed under condition 4-3, the proponent shall: (1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified;	Groundwater Monitoring and Management Plan Section 2.6.4: In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, BHP will report in accordance with the requirements of the relevant Ministerial Statement Condition(s).	As was reported in the 2024 CAR, results obtained from regular groundwater baseline monitoring at bore BMB10-D (now renamed NWMGW-BMB10 Deep) continue to indicate that the measured Electrical Conductivity (EC) consistently exceeds the defined trigger values. These exceedances relate to natural baseline water quality and are not impact related. Previous discussions with the EPA and DWER regarding the amendments to GMMP and GWOS that address these “exceedances” are ongoing and have been reflected in the revised documents that have been prepared for approval. Until approval of the Amended GMMP and GWOS, this will continue to be reported as a non-compliance in the CAR. The CEO was notified of this non-compliance in 2024 and 2025, and notification of this non-conformance is included in the covering letter to this CAR.

5. STATEMENT OF COMPLIANCE

A Statement of Compliance using the EPA Post Assessment Form 2 is provided in Appendix 6.

6. APPENDICES

A1. APPENDIX 1 - COMPLIANCE AUDIT TABLE FOR MS 1188

Note:

- ☐ 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.
- ☐ Phases that apply in this table = Pre-Construction, Construction, Operations, Decommissioning, Overall
- ☐ Abbreviations: CAP = Compliance Assessment Plan; CAR = Compliance Assessment Report; CEO = Chief Executive Officer of EPA; DWER= Department of Water and Environment Regulation; DBCA= Department of Biodiversity, Conservation and Attractions; EPA = Environmental Protection Authority; Min for Env = Minister for the Environment; EPA = Environmental Protection Authority;
- ☐ Compliance Status: C = Compliant, CLD= Completed, NC= Non - Compliant, NR = Not Required at this stage. Please note the terms NA = Not Audited and VR = Verification Required are only for DWER use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M1	Limitation and Extent of Proposal	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: Physical Elements - Mine and associated infrastructure - Development Envelope of 21,660 ha - Clearing - No more than 4,123.2 ha of native vegetation within a development envelope (DE) of 21,660 ha Operational Elements - Mining Voids - Nebo pit void to be backfilled above water table post-closure - Mining Waste - Placement of up to 1,465 Mt of waste rock into permanent waste rock dumps - Ore processing waste (tailings) - Disposal of up to 315 Mt of tailings into a tailings storage facility and/or Nebo pit void - Power Supply - Up to 60 megawatt (instantaneous load requirement) of fossil fuel electricity generation - Water supply - Abstraction of up to 7.5 gigalitres per annum via borefield and dewatering - Project Life- 26 Years	The Proposal will not exceed the extents outlined in Condition 1 of the Ministerial Statement	Annal survey data Annual throughput data (tailings, power generation, water abstraction) Annual clearing data	Overall	Life of Project	C	- A total of 617.5 ha of the 4,213.3 ha approved under MS1188 has been cleared to date. No clearing was conducted during the reporting period. - Records of clearing within the Development Envelope are maintained within the WAN spatial databases. - The total volume of water abstracted for the reporting period is 13,989kL (only 0.19% of the annual 7.5GL/year groundwater allocation, and a further reduction on the 2.05% of allocation used during the previous reporting period). - Permanent power supply has not been constructed. - The project was in construction prior to entering temporary suspension and the operational elements relating to mining voids, waste rock, tailings and project life are not yet relevant.



AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M2-1	Cultural Heritage	The proponent shall implement the proposal to meet the following environmental outcomes: (1) no direct disturbance of the ethnographic exclusion zones, data of which is held by the EPA and CEO; and (2) subject to reasonable health and safety requirements, no interruption of ongoing access to land utilised for traditional use or custom by the Ngaanyatjarra People.	Implement the Cultural Heritage Management Plan (CHMP)	Aerial photography showing maintenance of exclusion zones Shared Access Plan agreement with Ngaanyatjarra People	Overall	Life of Project	C	- Exclusion zones have not been disturbed directly and are physically demarcated in the field using survey methods and pink and black pegs. Their locations are also indicated in the BHP spatial database. - Spatial data showing current disturbance in relation to exclusion areas is maintained in the BHP spatial database. - Access to cultural sites was preserved during the reporting period. This did not present a risk to health and safety of the community or the workforce. - Access routes to cultural sites which may interact with mining operations have been agreed between BHP and the NgC in the Shared Access and Road Safety Management Plan (WM-0000-WHS-PLN-0028). The Plan formed part of the



AUDIT TABLE



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								Mining Agreement Variation review that was commenced in March 2025. Proposed variations, including those relating to access were endorsed at the Native Title Authorisation Meeting in April 2026 with signatures pending for Directors from each party. The TO's have unrestricted access to culturally significant places such as Pilpirrin and Linton Bore.
1188:M2-2	Cultural Heritage	The proponent shall implement the proposal to meet the following environmental objectives: (1) avoid, where possible, and otherwise minimise indirect impacts to cultural heritage within and surrounding the development envelope; and (2) avoid, where practicable, and otherwise minimise direct disturbance to archaeological cultural heritage sites.	Implementation of the CHMP	Monitoring consistent with CHMP management targets and performance criteria Aerial photography showing absence of direct impact to archaeological cultural heritage sites	Overall	Life of Project	C	Direct and indirect impacts have been minimised and avoided during the reporting period. Please refer to Appendix 2 (CHMP Audit Table).
1188:M2-3	Cultural Heritage	The proponent shall implement the West Musgrave Copper and Nickel Project Cultural Heritage Management Plan (Revision 3, October 2021) with the objective of ensuring that the outcomes of condition 2-1(1) and 2-1(2) and the objectives of condition 2-2(1) and 2-2(2) are achieved.	Implementation of the CHMP	CHMP management targets and performance criteria complied with	Overall	Life of Project	C	Please refer to Appendix 2 (CHMP Audit Table).



AUDIT TABLE



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M2-4	Cultural Heritage	The proponent may review and revise the West Musgrave Copper and Nickel Project Cultural Heritage Management Plan (Revision 3, October 2021) or any subsequent revisions in consultation with the NGC and as approved by the CEO.	Revise and review the CHMP in consultation with the NGC	CHMP to contain review history Evidence of correspondence with NGC	Overall	Life of Project	C	The NGC CHMP is currently under review (with input from BHP). Once the NGC CHMP has been completed, BHP will revise the MS1188 CHMP based on the requirements of that plan.
1188:M2-5	Cultural Heritage	The proponent shall review and revise the West Musgrave Copper and Nickel Project Cultural Heritage Management Plan (Revision 3, October 2021) as and when directed by the CEO by notice in writing, and in consultation with the NGC, as detailed in condition 2-4.	Review of the CHMP when required by the CEO	CHMP to contain review history	Overall	Life of Project	NR	No direction for review was received.
1188:M2-6	Cultural Heritage	The proponent shall continue to implement the approved Cultural Heritage Management Plan, or any subsequently approved revisions, until the CEO has confirmed by notice in writing that the proponent has demonstrated that the outcomes of condition 2-1 and the objectives of condition 2-2 are being and will continue to be met.	Implement the CHMP until the CEO has confirmed outcomes outlined in MS1188 have been achieved	Compliance Assessment Reports Confirmation in writing from the CEO	Overall	Life of Project	C	Please see Appendix 2 for an assessment of compliance with the CHMP.
1188:M2-7	Cultural Heritage	In the event of failure to implement management actions detailed in the approved Cultural Heritage Management Plan, the proponent shall notify the CEO in writing within seven (7) days of the non-compliance being identified and shall immediately implement the contingency actions described in the plan.	Write to the CEO within seven days and implement contingency actions following non-compliance	Written evidence of notification to the CEO Records of contingency actions	Overall	Life of Project	NR	Please see Appendix 2 for an assessment of compliance with the CHMP.
1188:M3-1	Flora and Vegetation	The proponent shall implement the proposal to meet the following environmental outcomes: (1) direct disturbance to be confined to the development envelope identified in Figure 2, limited to 4,213.3 ha; (2) the loss of no more than (one) 1 population	Implement Flora and Vegetation Management Plan (FVMP)	Annual survey data Annual flora take records Aerial photography showing maintenance	Overall	Life of Project	C	- All disturbance is confirmed to the approved disturbance envelope. - A total of 617.5 ha of the 4,213.3-ha



AUDIT TABLE



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		of the flora species <i>Aenictophyton anomalum</i> within the development envelope; (3) no direct disturbance in exclusion areas for <i>Aenictophyton anomalum</i> identified on Figure 3; and (4) the loss of no more than 10% of the known population of <i>Goodenia asteriscus</i> or <i>Amaranthus centralis</i>, or more than 5.2% of any other Priority flora species.		of exclusion zones				approved under MS1188 ha has been cleared to date. No clearing of <i>Aenictophyton anomalum</i> or disturbance within its exclusion areas has occurred during the reporting period, or during the project to date. Please see Appendix 3, FVMP Audit Table.
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AUDIT TABLE



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PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M3-2	Flora and Vegetation	The proponent shall implement the proposal to meet the following environmental objective: (1) avoid, where possible and otherwise minimise impacts to native flora and vegetation, including impacts from clearing, weeds, and fire.	Implementation of the FVMP	Compliance with agreed management targets and monitoring requirements	Overall	Life of Project	C	Please see Appendix 3, FVMP Audit Table.
1188:M3-3	Flora and Vegetation	The proponent shall implement the West Musgrave Copper and Nickel Project Flora and Vegetation Management Plan (Revision 1, September 2021), and subsequent approved revisions, with the objective of ensuring the environmental outcomes of condition 3-1 and the objective of condition 3-2 are achieved.	Implementation of the FVMP	FVMP management targets complied with	Overall	Life of Project	C	Please see Appendix 3, FVMP Audit Table.
1188:M3-4	Flora and Vegetation	The proponent shall implement the latest revision of the Flora and Vegetation Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of conditions 3-1 and 3-2.	Implement the latest FVMP addressing conditions 3-1 and 3-2 following confirmation by CEO	FVMP management targets complied with Written approval of FVMP by CEO	Overall	Life of Project	C	Please see Appendix 3, FVMP Audit Table.
1188:M3-5	Flora and Vegetation	The proponent: (1) may review and revise the Flora and Vegetation Management Plan; or (2) shall review and revise the Flora and Vegetation Management Plan as and when directed by the CEO, including (if directed) in consultation with the NGC.	Revise and review the FVMP when directed by the CEO	Written evidence of review requirement FVMP contains review history	Overall	Life of Project	C	There is no requirement for a review,



AUDIT TABLE



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Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M3-6	Flora and Vegetation	The proponent shall continue to implement the Flora and Vegetation Management Plan, or any subsequent revisions as confirmed by the CEO in condition 3-4, until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes detailed in condition 3-1 have been met.	Implement the FVMP until the CEO has confirmed outcomes outlined in MS 1188 have been achieved	FVMP management targets complied with Confirmation in writing from the CEO	Overall	Life of Project	C	Please see Appendix 3, FVMP Audit Table.
1188:M4-1	Inland Waters	The proponent shall implement the proposal to meet the following environmental outcomes: (1) ensure drawdown does not exceed (one) 1 metre at Linton Bore; and (2) no drawdown related adverse impacts to culturally important vegetation.	Implement the Groundwater Monitoring and Management Plan (GMMP)	Groundwater level monitoring data Visual assessment of culturally important vegetation	Overall	Life of Project	C	The total volume of water abstracted for the reporting period is 13,989kL (0.19% of the annual 7.5GL/year groundwater allocation. No drawdown related impacts have been observed.
1188:M4-2	Inland Waters	The proponent shall revise the West Musgrave Copper and Nickel Project Groundwater Monitoring and Management Plan (Revision 2, September 2021) to ensure it is consistent with achievement of the environmental outcomes in condition 4-1. The plan shall: (1) when implemented, substantiate, and demonstrate that condition 4-1 is being met; (2) specify trigger criteria that will trigger the implementation of management and/or contingency actions to ensure achievement of the environmental outcomes in condition 4-1; (3) specify threshold criteria to demonstrate compliance with condition 4-1; (4) specify monitoring methodology to determine if trigger criteria and threshold criteria have been met; (5) specify management and/or contingency actions to be implemented if the trigger criteria required by condition 4-2(2) and/or the threshold criteria required by condition 4-2(3)	Revise the GMMP to ensure Consistency with environmental outcomes and Inclusion of elements outlined in Condition 4-2	GMMP contains review history Written evidence of approval of revised GMMP by CEO	Overall	Life of Project	C	The GMMP is currently under review with the intent to align the proposed monitoring with the MS1188 conditions and the Groundwater Operating Strategy (GWOS).



AUDIT TABLE



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		have not been met (including changes to operations, reduction in extraction and consideration of alternative sources (subject to regulatory approval)); and (6) provide a format and timing for the reporting of monitoring results against trigger criteria and threshold criteria to demonstrate that condition 4-1 has been met over the reporting period in the Compliance Assessment Report required by condition 10-6.						
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AUDIT TABLE



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PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M4-3	Inland Waters	The proponent shall implement the latest revision of the Groundwater Monitoring and Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of conditions 4-1 and 4-2.	Implement the latest GMMP addressing conditions 4-1 and 4-2 following confirmation by CEO	GMMP management outcomes complied with.	Overall	Life of Project	C	Please see Appendix 4, GMMP Audit Table. As detailed in the Appendix 4, a non-conformance was identified under Section 2.6.1. of MS1188 in relation to the continuing exceedance of groundwater threshold levels at bores NWMGW-BMB 10 Deep and NWMGW-BMB 10 Shallow. The appropriateness of the threshold levels will be addressed in a revised GMMP.
1188:M4-4	Inland Waters	The proponent shall not undertake groundwater extraction activities for construction or operation of the proposal until the CEO has confirmed in writing that the revisions to the Groundwater Monitoring and Management Plan required under condition 4-2 meet the requirements of that condition.	Await confirmation from the CEO in writing of compliance of GMMP with condition 4-2 prior to undertaking groundwater extraction activities	Correspondence from the CEO of approval of revised GMMP Bore flow meter records	Construction and Operation	Prior to commencing groundwater extraction activities	CLD	- GMMP approved 29/07/22. - The total volume of water abstracted for the reporting period is 13,989kL (0.19% of the annual 7.5GL/year groundwater allocation).



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Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

1188:M4-5	Inland Waters	In the event that monitoring or investigations at any time indicate an exceedance of threshold criteria specified in the Groundwater Monitoring and Management Plan, which is confirmed under condition 4-3, the proponent shall: (1) report the exceedance in writing to the CEO within seven (7) days of the exceedance being identified; (2) implement the contingency actions required by condition 4-2(5) within seven (7) days of the exceedance being reported as required by condition 4-5(1) and continue implementation of those actions until the CEO has confirmed by notice in writing that it has been demonstrated that the threshold criteria are being met and implementation of the threshold contingency actions are no longer required; (3) investigate to determine the cause of the threshold criteria being exceeded; (4) investigate to provide information for the CEO to determine potential environmental harm or alteration of the environment that occurred due to threshold criteria being exceeded; and (5) provide a report to the CEO within twenty-one (21) days of the exceedance being reported as required by condition 4-5(1). The report shall include: (a) details of threshold contingency actions implemented; (b) the effectiveness of the threshold contingency actions implemented against the threshold criteria; (c) the findings of the investigations required by conditions 4-5(3) and 4-5(4); (d) measures to prevent the threshold criteria being exceeded in the future; (e) measures to prevent, control or abate the environmental harm which may have occurred; and (f) justification of the threshold remaining, or being adjusted based on better understanding,	Report and implement contingency actions following non-compliance	Written evidence of notification of the CEO Records of contingency actions Investigation Report Written evidence of provision of Investigation report to CEO Written notification from CEO that Threshold Criteria have been met & ongoing contingency actions are not required	Overall	Life of Project	C	The project was in construction phase prior to entering temporary suspension. No material or Project-attributable exceedance of threshold criteria occurred during the reporting period. As was first reported in the 2024 CAR and again in 2025, the measured EC at bore location BMB10-D is consistently (i.e. stable) above the defined trigger, indicating there are statistical limitations in the baseline range, given no causal effect near this bore is noted (due to limited site activities). This trend continued during the reporting period when no activities were performed in the vicinity of this bore. In the previous reporting period, sulphate exceedances were recorded in four (4) locations across the mining area (MMB-01 and MMB-02) and Northern Borefield (BMB-05S and BMB10-S), and elevated levels were again measured during the current period. These exceedances are not attributable to the Project, but rather a reflection of the
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AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

		demonstrating that objectives will continue to be met.						baseline range. The appropriateness of the threshold levels will be addressed in a revised GMMP.
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AUDIT TABLE

Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M4-6	Inland Waters	The proponent: (1) may review and revise the Groundwater Monitoring and Management Plan; or (2) shall review and revise the Groundwater Monitoring and Management Plan as and when directed by the CEO, including (if directed) in consultation with the NGC.	Revise and review the GMMP when directed by the CEO	Written evidence of review requirement GMMP contains review history	Overall	Life of Project	NR	The CEO did not provide direction to review the GMMP. BHP has initiated a review of the GMMP during the reporting period and is currently still underway.
1188:M4-7	Inland Waters	The proponent shall continue to implement the Groundwater Monitoring and Management Plan, or any subsequent revisions as confirmed by the CEO in condition 4-3, until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcomes detailed in condition 4-1 have been met.	Implement the GMMP until the CEO has confirmed outcomes outlined in MS 1188 have been achieved	GMMP management outcomes complied with confirmation in writing from the CEO outcomes met	Overall	Until the CEO has confirmed in writing environmental outcomes have been achieved	C	Please see Appendix 4, GMMP Audit Table.
1188:M5-1	Greenhouse Gas Management	The proponent shall take measures to ensure that net greenhouse gas (GHG) emissions do not exceed: (1) 915,000 t CO ₂ -e for the period between project commencement and 30 June 2028; (2) 780,000 t CO ₂ -e for the period between 1 July 2028 and 30 June 2033; (3) 378,000 t CO ₂ -e for the period between 1 July 2033 and 30 June 2038; (4) zero (0) t CO ₂ -e per annum for every 5 year period from 1 July 2038 onwards.	Implementation of the Greenhouse Gas Management Plan (GGMP)	Annual GHG monitoring data	Overall	Life of Project	C	Evidence of compliance with the limits imposed for the construction period of the project were communicated to the CEO in the Statement of Compliance of 17 April 2025. On 25 November 2024, BHP was notified that the EPA would be conducting an inquiry under section 46 of the <i>Environmental Protection Act 1986</i> into changing the MS1188 Greenhouse Gas Management conditions. BHP responded to a



AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

								request for information relating to the matter 23 May 2025 for further review by the EPA. On 18 December 2025 EPA Services notified BHP that the inquiry is ongoing and that it was expected to be completed by the first quarter 2026.
1188:M5-2	Greenhouse Gas Management	The proponent shall submit a report to the CEO each year by 31 March, commencing on the first 31 March after the date of this Statement specifying for the previous financial year: (1) the quantity of proposal GHG emissions and copper and nickel concentrates produced; and (2) the emissions intensity for the proposal.	Submit an annual report to the CEO specifying for the previous financial year the required information	Email or correspondence showing submission of report to the CEO	Overall	31 March each year following the 20 April 2022 for the life of the Project	C	The annual GHG Report was submitted to the CEO on 26 March 2026.



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Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M5-3	Greenhouse Gas Management	The proponent shall submit to the CEO by 31 March 2029, and every fifth 31 March thereafter a report specifying: (a) for each of the preceding five (5) financial years, the matters referred to in conditions 5-2(1) and (2); (b) for the period specified in conditions 5-1(1), (2), (3) or (4) that ended on 30 June of the year before the report is due: (i) the quantity of proposal GHG emissions; (ii) the net GHG emissions; (iii) the type, quantity, identification or serial number, and date of retirement or cancellation of any authorised offsets which have been retired or cancelled and which have been used to calculate the net GHG emissions referred to in condition 5-3(1)(b)(ii), including written evidence of such retirement or cancellation; and (iv) any measures that have been implemented to avoid or reduce proposal GHG emissions (2) an audit and peer review of the report required by condition 5-3(1), carried out by an independent person or independent persons with suitable technical experience dealing with the suitability of the methodology used to determine the matters set out in the report, whether the report is accurate and whether the report is supported by credible evidence. This report is to be made publicly available as required by condition 5-8.	Submit report to the CEO by 31 March 2029 and every fifth 31 March thereafter	Email or correspondence showing submission of reports to CEO Statement of qualifications of independent expert conducting peer review Statement from peer reviewer regarding the accuracy of report Availability of audit and peer review of report on BHP website	Overall	Every fifth 31 March following and including 31 March 2029	NR	Report not required yet.



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PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M5-4	Greenhouse Gas Management	A summary document comprising of a summary plan and progress statement outlining key information from the greenhouse gas management plan (and reports to that time) must be provided every five (5) years thereafter as per condition 5-3 and also if the greenhouse gas management plan is revised under condition 5-7. The summary, where feasible must include: (1) a graphical comparison of scope 1 emission reduction commitments in the greenhouse gas management plan with 'actual' emissions for compliance periods; (2) proposal performance against benchmarking for comparable facilities; (3) emissions intensity; (4) a summary of emission reduction measures undertaken by the proponent; and (5) a clear statement as to whether interim targets have been achieved.	Produce a summary document comprising of a summary plan and progress statement outlining key information from the GGMP	Email or written notification of submission of Summary Document	Overall	Every five years or when GHGMP revised	NR	Report not required yet.
1188:M5-5	Greenhouse Gas Management	Within two (2) months of the date of this Statement, the proponent shall revise the West Musgrave Copper and Nickel Project Greenhouse Gas Management Plan (Revision 2, October 2021) to ensure it is consistent with the requirements of this condition 5, including achievement of the net GHG emissions limits in condition 5-1 (or achievement of emission reductions beyond those required by those emission limits). The proponent shall implement: (1) the latest version of the plan that the CEO has confirmed in writing meets the requirements of condition 5-7.	Revise the GGMP and implement the latest version	Submission to the CEO of the revised GGMP Written evidence of confirmation from the CEO	Overall	Two months from the issue of MS 1188 i.e. 20 June 2022	C	The revised GHGMP was submitted to the EPA on 24/6/2022. In a letter dated 12 June 2024 the CEO (DWER) confirmed that the GHGMP meets the requirements of MS 1188 (condition 5) and that the plan must be implemented and made publicly available. It has been published on the BHP West Musgrave web page. On 25 November 2024, BHP was notified that the EPA would be



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PROJECT: West Musgrave Copper and Nickel Project

								conducting an inquiry under section 46 of the <i>Environmental Protection Act 1986</i> into changing the MS1188 Greenhouse Gas Management conditions and management plan. On 18 December 2025 EPA Services notified BHP that the inquiry is ongoing and that it was expected to be completed by the first quarter 2026.
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AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M5-6	Greenhouse Gas Management	The proponent: (1) may revise a greenhouse gas management plan at any time; (2) must revise the greenhouse gas management plan if there is a change to the proposal which means there is a material risk that condition 5-1 will not be achieved; (3) must revise the greenhouse gas management plan at least every five (5) years to align with the five (5) yearly reporting requirements specified in condition 5-3; and (4) must revise a greenhouse gas management plan if directed to by the CEO, within the time specified by the CEO.	At a minimum, five yearly revisions of the GGMP will occur. Revision of the GGMP in the instance changes to the proposal occur or when directed by the CEO	Evidence of five yearly revision of the GGMP Written notification to review from the CEO Revision history included within GMMP	Overall	Life of Project	NR	No review required during reporting period.
1188:M5-7	Greenhouse Gas Management	The proponent shall ensure any revised greenhouse gas management plan: (1) is consistent with the achievement of the emission limits in condition 5-1 (or achievement of emission reductions beyond those required by the emission limits); (2) specifies the estimated proposal GHG emissions, net GHG emissions and total GHG emissions intensity for the remainder of the life of the proposal; (3) includes comparison of each of the estimated emissions and emissions intensity figures referred to in condition 5-7(2) for the remainder of the life of the proposal against other comparable projects; (4) identifies and describes any measures that the proponent will implement to avoid, reduce and/or offset proposal GHG emissions, or reduce the total GHG emissions intensity of the proposal; (5) specifies interim and long-term targets for avoiding, reducing and/or offsetting proposal GHG emissions; and	Revised GGMPs will be consistent with the requirements outlined by MS 1188 Condition 5-7	Written approval of GHGMP revisions from CEO	Overall	Life of Project	NR	No review required during reporting period.



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Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(6) provides for a program for the future review of the plan to: (a) assess the effectiveness of measures referred to in condition 5-7(4); and (b) identify and describe options for future measures that the proponent may or could implement to avoid, reduce and/or offset proposal GHG emissions or reduce the emissions intensity of the proposal. (7) is accompanied by a summary plan.						
1188:M5-8	Greenhouse Gas Management	The proponent shall make all greenhouse gas management plans and all reports required under this condition 5 (including audits and peer reviews, summary plans and progress statements) publicly available on the proponent's website within the timeframes specified below for the life of the proposal, or in any other manner or time specified by the CEO: (1) the greenhouse gas management plan (and summary plan) referred to in condition 5-5 within two (2) weeks of receiving notice from the CEO in writing confirming the plan meets the requirements of condition 5-7; (2) the report referred to in condition 5-2 within two (2) weeks of the report being submitted to the CEO; (3) the reports, audits and peer reviews, summary plans and progress statements referred to conditions 5-3 and 5-4 within two (2) weeks of the relevant reports, summary statements and progress reports being submitted to the CEO; and (4) any revised greenhouse gas management plan referred to in condition 5-6 within two (2) weeks of receiving confirmation from the CEO as referred in condition 5-5(1).	Make GGMPs and reports publicly available on the BHP Website.	GGMPs and reports publicly available within specified timeframes	Overall	Life of Project	NC	The GHGMP has been made publicly available via the BHP Website. The report required by Condition 5-2 for FY 2024-2025 was not made publicly available on the BHP Website within two weeks of it being submitted to the CEO. A request for publication of the information on the BHP Website has been submitted internally and is in the process of being actioned.



AUDIT TABLE



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PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M6-1	Terrestrial Fauna	To prevent impacts to significant fauna species, the proponent shall implement the proposal to meet the following environmental outcome: (1) loss of no more than 6.7 ha of the spinifex sandplain habitat.	Implementation of TFMP	Annual survey data	Overall	Life of Project	C	TFMP Rev 1 was approved on 20/04/2022. No loss of Spinifex Sandplain habitat occurred during reporting period. Evidence is maintained in the BHP spatial database.
1188:M6-2	Terrestrial Fauna	The proponent shall implement the proposal to meet the following environmental objective: (1) avoid, where possible and otherwise minimise impacts to native fauna, including impacts from clearing, fragmentation, vehicles and machinery, pipeline construction, feral animals, weeds, and fire.	Implementation of TFMP	Annual survey data Pipeline trench clearing records Feral animal observations & control program records Weed survey & control program records Fire records/aerial photographs	Overall	Life of Project	C	Please See Appendix 5, TFMP Audit Table.
1188:M6-3	Terrestrial Fauna	The proponent shall implement the West Musgrave Copper and Nickel Project Terrestrial Fauna Management Plan (Revision 1, September 2021) with the objective of ensuring the environmental outcome of condition 6-1 and the objective of condition 6-2 are achieved.	Implementation of TFMP	TFMP management targets complied with	Overall	Life of Project	C	Please See Appendix 5, TFMP Audit Table.



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PROJECT: West Musgrave Copper and Nickel Project

1188:M6-4	Terrestrial Fauna	In the compliance assessment report required under condition 10-6, the proponent shall detail the reporting to the NGC of any conservation significant fauna or culturally significant fauna deaths and feral animal monitoring outcomes attributable to the implementation of the proposal.	Include reporting to the NGC in the annual Compliance Assessment Report	Fauna death records Feral animal monitoring records Written correspondence with NGC	Overall	Life of Project	C	Please See Appendix 5, TFMP Audit Table. No deaths of conservation significant or culturally significant fauna were recorded during the reporting period.
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AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M6-5	Terrestrial Fauna	The proponent shall implement the latest revision of the Terrestrial Fauna Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of conditions 6-1 and 6-2.	Implementation of TFMP	TFMP management targets complied with Confirmation in writing from the CEO	Overall	Life of Project	C	Please See Appendix 5, TFMP Audit Table.
1188:M6-6	Terrestrial Fauna	The proponent: (1) may review and revise the Terrestrial Fauna Management Plan; or (2) shall review and revise the Terrestrial Fauna Management Plan as and when directed by the CEO, including (if directed) in consultation with the NGC.	Revise and review the TFMP when directed by the CEO.	Written evidence of review and revision of the TFMP TFMP to contain review history	Overall	Life of Project	C	BHP has completed consultation with the NgC regarding the contents of the TFMA. The revised document will be submitted to the CEO once revised.
1188:M6-7	Terrestrial Fauna	The proponent shall continue to implement the Terrestrial Fauna Management Plan, or any subsequent revisions as confirmed by the CEO in condition 6-5, until the CEO has confirmed by notice in writing that the proponent has demonstrated that the environmental outcome and objective detailed in conditions 6-1 and 6-2 have been met.	Implementation of TFMP	TFMP management targets complied with Confirmation in writing from the CEO outcomes have been met	Overall	Life of Project	C	Please See Appendix 5, TFMP Audit Table.
1188:M7-1	Environmental Performance Report	The proponent shall submit an Environmental Performance Report to the Minister every five (5) years.	Prepare and submit an Environmental Performance Report	Written confirmation of submission of report to the Minister	Overall	Every 5 years for the life of the Project	NR	Not yet required.



AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M7-2	Environmental Performance Report	The first Environmental Performance Report shall be submitted within three months after five (5) years from substantial commencement, or such other time as may be approved by the CEO.	Prepare and submit an Environmental Performance Report	Written evidence of submission of the Environmental Performance Report	Overall	Within 3 months after 5 years from substantial commencement and every 5 years following	NR	Not yet required.
1188:M7-3	Environmental Performance Report	Each Environmental Performance Report shall report on proposal impacts on the following environmental values: (1) state of social surroundings including cultural heritage, landscape, access for traditional use and custom, and amenity; (2) state of flora and vegetation; (3) state of groundwater; (4) state of terrestrial fauna; and (5) state of the holistic environment.	Prepare Environmental Performance Report to include required information	Submitted Environmental Performance Report	Overall	Life of Project	NR	Not yet required.
1188:M7-4	Environmental Performance Report	The Environmental Performance Report must include: (1) a comparison of the environmental values identified in condition 7-3 at the end of the 5 year period; against the state of each environmental value at the beginning of the 5 year period; (2) a comparison of the environmental values identified in condition 7-3 at the end of the five (5) year period; against the state of the environmental values identified in first Environmental Performance Report submitted in accordance with condition 7-2; and (3) proposed adaptive management and continuous improvement strategies.	Prepare Environmental Performance Report to include required information	Submitted Environmental Performance Report	Overall	Life of Project	NR	Not yet required.



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PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M7-5	Environmental Performance Report	The Environmental Performance Report may be in whole, or part prepared in conjunction with other proponents where there are cumulative impacts from their proposals.	Prepare Environmental Performance Report	Acknowledgement included in Environmental Performance Report of cooperation with other proponents	Overall	Life of Project	NR	There are no other proponents in the area.
1188:M8-1	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 of changes to contact details	Correspondence to the CEO	Overall	Life of Project	C	No relevant changes during the reporting period.
1188:M9-1	Time Limit for Proposal Implementation on on	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Commence proposal prior to 20 April 2027	Photo and as built plans showing on ground activities	Overall	On or before 20 April 2027	C	Construction commenced in November 2022. Substantial commencement has occurred.
1188:M9-2	Time Limit for Proposal Implementation on on	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 CEO with written evidence of substantial commencement	Written correspondence to the CEO	Overall	On or before 20 April 2027	C	Notification of substantial commencement was provided to the CEO on 7 July 2023.



AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M10-1	Compliance Reporting	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 10-6, or prior to implementation of the proposal, whichever is sooner.	Prepare Compliance Assessment Plan	Email or other written notification of submission of CAP Approval of CAP by CEO	Overall	At least 6 months prior to the first Compliance Assessment Report or prior to implementation of the proposal	C	CAP submitted to DWER 19/10/2022 and subsequently amended in July 2024.
1188:M10-2	Compliance Reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	CAP to contain required information	Compliance Assessment Plan	Overall	Life of Project	C	The revised Compliance Assessment Plan was approved by the CEO on 18 December 2024.
1188:M10-3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 10-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 10-1.	Annual compliance audit	Correspondence from CEO that CAP approved. Annual Compliance Assessment Reports	Overall	Life of Project	C	This CAR is based on the time periods and format approved under the revised CAP, as approved on 18 December 2024.
1188:M10-4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 10-1 and shall make those reports available when requested by the CEO.	Document filing system to retain required records	Annual Compliance Assessment Reports available on request	Overall	Life of Project	C	All compliance records and reports are retained and maintained in the BHP document management, event reporting system and spatial database.



AUDIT TABLE



Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M10-5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	Notification of non compliance	Written notification of non compliance to CEO dated within 7 days of identification	Overall	Within 7days of detection of non-compliance	C	Non-conformances identified during the compilation of this CAR were reported to the CEO at the same time as its submission.
1188:M10-6	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; (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 10-1.	CAR prepared to contain required information and submitted	Written notification of submission of CAR CAR contents comply with information requirements	Overall	First report by 20 July 2023	NC	The 2026 CAR is the fourth CAR submitted under M10-6 and complies with the relevant requirements of this condition. The 2025 CAR was not published on the BHP Website after its submission to the CEO. A request for publication of the information on the BHP Website has been submitted internally and is in the process of being actioned.



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Proposal Implementation Monitoring Branch

PROJECT: West Musgrave Copper and Nickel Project



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1188:M11-1	Public Availability of Data	Subject to condition 11-2, 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 (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps)), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	Make all validated environmental data, management plans and reports publicly available within a reasonable time period	Validated environmental data, management plans and reports available publicly through the BHP website	Overall	A reasonable time period approved by the CEO, for the remainder of the life of the proposal	C	The BHP Website has links to the management plans, reports and validated environmental data relevant to the assessment of this proposal and implementation of this Statement.
1188:M11-2	Public Availability of Data	If any data referred to in condition 11-1 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.	Letter to CEO requesting not to make sensitive data publicly available	Written letter to the CEO Written approval from CEO to exclude data from public availability	Overall	Reasonable time period from the issue of this statement	C	The NgC has requested maps and data relating to locations of cultural heritage sites to be kept confidential. BHP has communicated this request to DWER and this is described in MS 1188 that the exclusion areas are held by the CEO.

A2. APPENDIX 2 – AUDIT FINDINGS FOR CHMP IMPLEMENTATION

Cultural Heritage Management Plan Audit Table

CHMP Reference	Element	Requirements		Compliance Status	Evidence
1.2	Context and Rationale Golden Rules	Do not start ground disturbing or non-ground disturbing work without an approved Land Disturbance Permit (LDP) (for ground disturbing activities) or Permit to Work (PTW) (for non-ground disturbing activities) as issued by the Ngaanyatjarra Council.		C	- Permit to Work 1 was issued 28 October 2022, Permit to Work 2.1 (for low impact activities such as surveys) was approved 28 February 2023. Spatial data for these permits are maintained in the BHP spatial database. - As per the Mining Agreement, no works (ground disturbing or otherwise) can be carried out without an approved Permit to Work or LADP (now G-LUP). - BHP Disturbance spatial data shows that all disturbance is within a previously approved LADP and that all current activities are performed under approved G-KLUPs. There was no new disturbance during the reporting period. - In November 2024, The LADP process has been superseded by the BHP Global Land Use Permit (G-LUP) system. No work has been conducted on site without an approved G-LUP.
		Never leaving designated work areas, accommodation areas or transport areas, unless in the case of an emergency		C	- There were no instances of excursions from approved work areas or breaches of the Golden Rules recorded during the reporting period. - No chance finds of cultural heritage material or skeletal remains were discovered during the reporting period. All activities were confined to existing roads and cleared areas.
		If you are unsure about whether you're operating or traversing through an approved work area, or if you think you've found cultural heritage material or skeletal remains, stop all works within a 50 m radius and tell your supervisor		C	
		In the case of a breach of the 'Golden Rules', or what is thought may be a breach, tell your supervisor immediately. BHP and the Ngaanyatjarra Council must be notified as soon as practicable to determine next steps.		C	
1.7.1.4	Indirect Impacts Table 5: Mitigation Measures for the Indirect Impacts to Cultural Heritage	Dust	Vehicles not permitted to leave access tracks or cleared areas without an approved Permit to Work (PTW) from the Ngaanyatjarra Council.	C	- Prior to temporary suspension, potential excursions from tracks and cleared areas were monitored through visual inspections and the RightStep geofencing system. Since the commencement of temporary suspension this has been limited to visual inspections only. - No clearing was conducted during the reporting period. - No unauthorised excursions from access tracks or cleared areas occurred for the reporting period.
			Machinery movements will be confined to defined roads and tracks.	C	No clearing activities or excursions form established tracks occurred during the reporting period.
			Vehicles required to travel at safe operating speeds on unsealed roads and are restricted from accessing rehabilitated surfaces except for rehabilitation management purposes	C	- Vehicle speed limits are signposted, with compliance monitored via the BHP In-Vehicle Monitoring System (IVMS). - There has been no unauthorised access to rehabilitated areas. The condition of these areas is monitored on an ad hoc basis from adjacent tracks.
			BHP will seal the offset-T intersection where the northern access road crosses over the Warburton to Blackstone Road to the cutline road. The sealing will include nominally 500 m to 750 m of the northern access road and cutline road, and the area of the Warburton to Blackstone Road between these two intersection points.	NR	- Road construction of an alternative Northern Access Road was not commenced during the period. Consultation with Traditional Owners is ongoing to determine suitable alignment. - Records of the latest communications between BHP and NGC regarding the road alignment are contained in minutes of previous West Musgrave Heritage Meetings.
			An alternative to sealing sections of the Northern Access Road will be a road realignment further from an existing heritage exclusion zone (subject to approval from the Ngaanyatjarra Council and attaining of relevant regulatory approvals)	NR	
			Land clearing would be kept to the minimum necessary for development of the project, reducing exposed areas subject to wind erosion.	C	- No land was cleared during the reporting period. - Clearing minimisation is conditioned in GLUPs, land clearing cannot occur until an approved GLUP is issued. Spatial records of clearing and GLUP boundaries are maintained in the BHP spatial database. - Prior to commencement of temporary suspension 63 ha of cleared area was treated with a soil binding agent to reduce wind erosion of exposed areas.

CHMP Reference	Element	Requirements		Compliance Status	Evidence
			Undertaking of annual (or as otherwise reasonably requested by the Ngaanyatjarra Council) photo-point monitoring for all cultural heritage sites (including archaeology sites) within the main development area and to within 3 km of the main development area and as otherwise reasonably requested by the Ngaanyatjarra Council, to undertake comparative analysis of dust accumulation against control sites. Ngaanyatjarra Senior Knowledge Holders and Traditional Owners will be invited to attend this monitoring through the Ngaanyatjarra Council and will be engaged to attend this monitoring on commercially acceptable terms.	C	- Photo-point monitoring for all cultural heritage sites has never been implemented as it raises confidentiality and access issues with respect to sensitive cultural heritage material and restrictions associated with access to sites outside of the Development Envelope and Mining Agreement areas. - Instead, depositional dust gauges have been installed at locations approved by NGC. Depositional dust is monitored monthly, and results are shared with NGC quarterly.
			Undertake quarterly quantitative monitoring of dust deposition gauges, within the main development area and to within 3 km of the main development area and as otherwise reasonably requested by the Ngaanyatjarra Council, to support analysis of dust accumulation at cultural heritage sites over time and in comparison, against control sites. Ngaanyatjarra Senior Knowledge Holders and Traditional Owners through the Ngaanyatjarra Council will be invited to jointly design dust monitoring programs and attend dust monitoring programs and will be engaged on commercially acceptable terms.		
			An exceedance of dust will be determined where the Ngaanyatjarra People or Ngaanyatjarra Council have raised concerns based on photo point monitoring, or formalised grievance and static dust monitoring indicates a significant increase of dust at the specified site, compared with control sites.	C	No concerns or grievances relating to photo-point or depositional dust monitoring were recorded for the reporting period. With the transition into temporary suspension, activity on site has reduced, resulting in a sharp decline in depositional dust levels. Low dust deposition is expected to continue through temporary suspension.
			Where practicable, land clearing would be undertaken progressively with the amount of active disturbance minimised	C	No land was cleared during the reporting period.
			Progressive rehabilitation would be undertaken on disturbed areas as they become available	C	No rehabilitation was undertaken during the reporting period.
			Topsoil and vegetation (including woody debris) would be re-spread over rehabilitated areas to act as a seed source and to protect the soil from erosion	C	No rehabilitation was undertaken during the reporting period.
			Dust managed by watering unsealed roads with a water cart or with fixed sprays as required	C	- Requirement to adhere to posted speed limits and water cart application mitigate dust generation from trafficable areas. - Prior to commencement of temporary suspension 63 ha of non-trafficable cleared area was treated with a soil binding agent to reduce dust generation.
			During high winds (wind speeds greater than 40 km/h averaged over 10 minutes), topsoil and overburden stripping and other high dust generating activities would be restricted.	C	No stripping, or other activities generating significant amounts of dust, were conducted during the reporting period.
			Spilt ore and materials outside of the ore processing areas would be regularly cleaned up and removed to a designated waste landform or fed into the processing plant.	NR	Project not operational
			Bulk products would be transported in covered containers	NR	Project not operational
			Vehicle hygiene measures would be adopted for the concentrate storage shed (including covered shed and maintain a system to avoid land contamination during transport of concentrate which will include sprayers, wheel wash stations or similar alternative).	NR	Project not operational
			Ensure that the cleared area is as small as reasonably required thereby reducing the amount of exposed dust producing surfaces.	C	No land was cleared during the reporting period. Dust suppression by watering cart is applied to roads and other trafficked areas on an as-needed basis.
		Noise	Machinery would be maintained in accordance with original equipment manufacturers (OEMs) requirements to minimise nuisance noise	C	- All equipment maintained onsite is maintained in accordance with OEM requirements and verified during pre-starts and regular inspections. No noise complaints received to date. - Enclosure of equipment has not been deemed necessary for the current phase of the operation. All generators come with their own enclosures.
			Where necessary equipment would be enclosed to reduce nuisance noise		
			Airstrip would be oriented to ensure cultural heritage sites are not within the approach and take-off angles unless otherwise agreed with Ngaanyatjarra Council.	C	Design of the airstrip considered the location of cultural heritage sites.
			Equipment design would be specified to be within Australian Standard noise limits.	C	All equipment maintained on site are specified to comply with applicable noise restrictions and relevant Australian Standards.

CHMP Reference	Element	Requirements		Compliance Status	Evidence
		Visual Amenity	Permanent landforms such as WRDs and TSFs would be similar in height to surrounding natural landforms (e.g. <60 m)	NR	Project not operational – permanent landforms not constructed.
			Progressive rehabilitation would be undertaken on disturbed areas as they become available	C	No new areas have become available for rehabilitation during the reporting period.
			Wind turbines and masts would be removed at closure, or as agreed with the Ngaanyatjarra Council	NR	Project not operational – wind turbines not constructed
			Lights would be strategically placed and designed to shine towards plant operations and minimise light spill to the environment	NR	Project not operational
		Lighting	Design of lighting arrangements with consideration to AS4282-1997: Control of the obtrusive effects of outdoor lighting.	C	Fixed lighting installations and mobile equipment lights are not visible from nearby communities and consider locations of nearby ethnographic sites.
			Before arriving at the final lighting design, consideration would be given to alternative lighting systems with respect to their capability of fulfilling both the functional and environmental design objectives	NR	Project not operational
			When there is some flexibility about where an illuminated area/activity can be sighted, it would be located and oriented where it would have the least effect on cultural heritage sites, taking into account any screening which may be provided by the surrounding topography or other physical features such as trees or sand dunes	NR	Project not operational
			The selected light fixtures would have a light output distribution appropriate for the application and would not emit excessive light outside the property boundaries	NR	Project not operational
			Louvres, baffles or shields or the like will be added to floodlights to control spill light where this did not significantly influence the performance of the lighting system	NR	Project not operational
			Floodlight locations are often determined by the nature of the activity for which the lighting is provided. Small departures from the recommended positions will be considered if this results in a greater degree of control of the spill light	C	The only operational floodlights are located on the aerodrome apron, which are only in use when being tested during inspections and if an aircraft is required to land at night.
		Groundwater	There will be no impact to water holes (water quality and water levels) at the Pilbirrin cultural heritage site, or any other cultural heritage sites as a result project-related activity	C	- The project is not operational and there are no drawdown impacts due to the limited water abstraction. - During the reporting period only 0.19% of annual licence allocation was abstracted. These volumes have no impact on proximate water holes.
		Ngaanyatjarra Social and Cultural Surroundings	BHP will report to the Ngaanyatjarra Council any environmental management exceedance, event or trend of concern that may indicate any environmental management issue, upon BHP becoming aware of the exceedance, event or trend, and will send to the Ngaanyatjarra Council any report and correspondence relating to that exceedance, event or trend at the same time it is sent to other third parties (e.g. government regulators).	C	- Any environmental management exceedance, event or trend that may indicate environmental management issues is raised with NGC via regular Environmental and Approvals Meetings as well as Liaison Committee Meetings. - The only ongoing exceedance that required notification to the NgC relates to the water quality (electrical conductivity) measured at NWMGW-BMB-10D that typically ranges around 3,200 µS/cm, above the GMMP threshold value of 3000 µS/cm. As it has been established that this bore has a higher natural background EC, application is being made to amend the GMMP. - NGC are notified of all non-compliances reported to regulatory authorities.
			BHP will notify the Ngaanyatjarra Council of any regulated changes to WMP Environmental Management Plans and collaborate with the Ngaanyatjarra Council in the drafting of those changes	C	Updates to the Weed Management Plan and Feral Fauna Management Plan are being finalised in collaboration with NGC.
			BHP will convene and resource a Cultural Heritage Management Decision Making Committee (CHMDC) (Section 3.3.3) and other meetings of Ngaanyatjarra Senior Knowledge Holders and Traditional Owners as they may be required from time to time (as notified by the Ngaanyatjarra Council or BHP)	C	- CHMDMC was superseded by the Heritage Committee required under the Mining Agreement. - There were no Heritage Committee meetings held during the reporting period due to the temporary suspension of the project. - Liaison Committee meetings were held on 30 July 2025 and 25 March 2026 - An oversight Committee meeting was held on 1-2 December 2025.
			BHP will invite Ngaanyatjarra People, through the Ngaanyatjarra Council, to undertake environmental monitoring across all phases of the WMP. If this invitation is accepted, BHP will pay for this monitoring on agreed fair and	C	Ngaanyatjarra People have participated as monitors in environmental activities including environmental controls

			reasonable commercial terms.		maintenance and rehabilitation works, and other on-country engagement activities: A total of 130 traditional owners participated in 44 monitoring and engagement events for a total of 1945 hours.
			A program of 'cultural geography' will be commissioned with the Ngaanyatjarra Council and Traditional Owners to characterise the cultural landscape beyond ethnographic sites of importance. This work may include the identification of graves, location of contemporary family connections, further research into the locations of dreaming trails and a deeper appreciation for cultural associations and practices performed in the West Musgrave area. This work will be done to inform chance find protocols, micro siting of infrastructure and provide a body of knowledge that will be used to inform cultural amenity impact offset strategies.	C	The Cultural Geography Project is under early development by the NGC with a financial contribution from BHP to partially support the project. The project will support the maintenance and strengthening of language and cultural heritage across the region, with a dedicated resource supporting language preservation, art and language projects, genealogy projects and grant writing,
			Attaining the Ngaanyatjarra People's consent to mine will follow the requirements of the WMP: Negotiation Process Agreement and follows that the Mining Agreement (once in effect) will set out the terms and conditions, including compensation, on which YNP and the Land Council consent to the development and operation of the Nebo-Babel Mine on the existing mining tenements and on any other mining tenements that may be granted in the Exploration Area and the Miscellaneous Licence Area.	C	- Mining Agreement has been effective since 22 September 2022. - In March 2025, Ng Parties and BHP commenced negotiations for Mining Agreement variations. The proposed variations were endorsed at the Native Title Authorisation Meeting in April 2026 with signatures pending for Directors from each party.

CHMP Reference	Element	Requirements		Compliance Status	Evidence
			BHP will, with the involvement of the CHMDC, maintain and meet its obligations pertaining to the protection and management of cultural heritage and the environment through a register of obligations.	C	- A Heritage Obligations Register, derived from the overall project obligations, is maintained by BHP Indigenous Engagement and Social Performance Team. All records relating to heritage and associated obligations are maintained in the BHP Cultural Heritage Information Management System (CHIMS). - All environmental obligations are maintained in the BHP Environmental Legal Obligations Register (NELOR).
			BHP will comply with the Ngaanyatjarra Council's CHMP, Revision O, dated 18 October 2021.	C	- Many requirements of the NGC CHMP have been incorporated into the EPA approved CHMP. Compliance with the EPA approved CHMP is documented in this assessment. - The Mining Agreement, effective 22 September 2022, requires an update of the NGC CHMP appended to the MS1188 CHMP. This update is in progress. Once complete, it will inform a review of this CHMP by BHP. - As required by the Mining Agreement, two Liaison Committee meetings and one Oversight Committee meeting were held during the reporting period, respectively on 30 July 2025, 25 March 2026 and 1-2 December 2025.
			BHP will continue to meet with and resource the Ngaanyatjarra Council and the Ngaanyatjarra People (as directed in the Mining Agreement (once in effect)) to regularly discuss the WMP, the impacts that have and may arise from the WMP and the actions required to mitigate and manage those impacts.		
			To mitigate against the risk of perceived impacts to cultural association and aesthetics, BHP will design and implement monitoring programs, jointly with Ngaanyatjarra People and the Ngaanyatjarra Council, to establish baseline environmental data so that if an impact concern is raised by Ngaanyatjarra People or the Ngaanyatjarra Council, that evidence can be provided as to why that impact event was not caused by the WMP. For example, if Ngaanyatjarra People perceive that water levels and/or water quality at a particular heritage site outside of the Development Envelope has been impacted by the WMP, evidence can be provided, as jointly obtained with Ngaanyatjarra People, as to why such an impact would likely not have arisen from the WMP	C	- Monitoring of groundwater, flora, vegetation and fauna is described in the GMMP, FVMP and TFMP. NGC provided input into each of these plans prior to approval by the EPA. - Environmental monitoring results are made available to NGC and discussed as Liaison Meetings and Environment and Approvals Meetings. Meeting minutes are maintained in the BHP document management system.
			A grievance system will be developed jointly with the Ngaanyatjarra Council to assist with documenting, investigating and responding to complaints made by community groups and stakeholders, and all stakeholder issues and concerns will be proactively addressed. The grievance system will be reviewed as part of the CHMDC standing agenda and records of material grievances included in the annual WMP Compliance Assessment Report.	C	- West Musgrave developed a dedicated grievance procedure in May 2024. In January 2025, West Musgrave transitioned to the BHP WAN Sentiment Management Procedure (applies to the whole of WA Nickel) with the transition into temporary suspension. Prior to this BHP used the framework provided in the draft West Musgrave Stakeholder Engagement Plan to address any complaints or grievances. - There were no grievances or complaints received during the reporting period.
	Methods for Pre- Clearance Surveys	A revision to this CHMP will be made following the completion of the Mining Agreement to include any changes or updates to the process for pre- clearance surveys.		C	The Mining Agreement, effective 22 September 2022, requires an update of the NGC CHMP appended to this CHMP. This update of this document by the NgC is in progress. Once complete, it will inform a review of this CHMP by BHP.
		To protect areas of significance, BHP must request clearance from the Ngaanyatjarra Land Council before proceeding with any works (which have not already been screened and cleared for a particular activity). The form of the request to the Ngaanyatjarra Land Council would come in the form of a formal heritage request, and must include: - Maps, plans and photographs where appropriate - Proposed means of access and locations of access for people and equipment - The location where work will be conducted and an estimated timeframe, scope and techniques to undertake the activity - The items of equipment to be used - Details of the location, and structures that may be erected - The identity of any contractors that may be used and minimum and maximum numbers of people to be involved, including their roles.		C	- Preclearance surveys are undertaken prior to an approved Permit to Work being issued by NGC in accordance with the requirements of the Mining Agreement. Further in field consultation with Traditional Owners is conducted in any work areas outside of PtW1. - No clearing or land access activities were conducted during the reporting period. Should any such activities be required, they will be dealt with under the following processes: - Land access and disturbance is governed by the G-LUP system, under which only works within the appropriate PtW area is permitted. NgC will be informed of any work under a G-LUP that involves land access or ground disturbing activities via the
		Following the receipt of notice, the Ngaanyatjarra Land Council and BHP will undertake (at an agreed expense covered by BHP) the organisation and implementation of a screening/clearance program by the Scouting Team of the required areas.			

		The tasks of the scouting team may include: • Determine whether proposed activities are likely to damage, disturb or encroach upon or interfere with areas of significance • Provide BHP advanced warning to enable relocation of work areas to avoid sites of significance • To make every reasonable endeavour to proceed with the work at a rate that will avoid standby.		process of requesting the presence of heritage monitors. - o NGC heritage monitors are invited to attend first ground disturbing activities and all other new land access e activities in accordance with the Mining Agreement, Permit to Work and G-LUP conditions. - o • Due to the project being in temporary suspension, there has been no work during reporting period that would require the involvement of a Scouting team or the performance of pre-clearance surveys.
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CHMP Reference	Element	Requirements	Compliance Status	Evidence
		The scouting team shall consist of the following: - Two anthropologists employed or engaged by the Ngaanyatjarra Land Council and agreed to by BHP - A liaison officer engaged by the Ngaanyatjarra Land Council - Four male and four female Traditional Owners (total of eight); or as otherwise agreed between the parties - The supervising anthropologist shall be responsible for the coordination of the scouting team. BHP shall appoint a representative to work in association with the scouting team, whose duties include: - Accompanying the scouting team to the proposed work areas - Identifying the relevant work area locations - Providing suitable maps of proposed work areas - Relocating infrastructure as needed to avoid significant areas - Communicate with the Ngaanyatjarra Land Council's supervising anthropologist. The Ngaanyatjarra Land Council's appointed supervising anthropologist's duties include: - Identifying appropriate Traditional Owners to accompany the scouting team. - Coordinate the work of the scouting team - Mark-up all sets of maps so that work areas cleared, or not cleared are designated - Act as a point of contact to the BHP representative. BHP must direct any variations to plans to the Ngaanyatjarra Land Council appointed supervising anthropologist Upon completion of screening and clearance of work areas, or any part thereof by the scouting team and notification by the Ngaanyatjarra Land Council, BHP are entitled to commence operations without being required to obtain any further clearance, unless further modifications to the cleared area are required (in which case a variation to the heritage clearance request must be issued to the Ngaanyatjarra Land Council) Where a work area, or part thereof has been screened or cleared subject to compliance with conditions specified by the Ngaanyatjarra Land Council, BHP may only conduct activities in accordance with these conditions Within seven days of the completion of the scouting tour the Ngaanyatjarra Land Council will notify BHP in writing by providing maps, indicating the scouting team's decision concerning acceptability or otherwise of the proposed locations of activities. This notification should be countersigned by an BHP representative. The notification will specify the proposed locations which have been screened and cleared for use by BHP and any conditions of use. BHP shall not carry out activities on any part of the Lands unless: - Within a defined work area screened and cleared by the scouting team - Until notification has been received relating to the screening and clearance, and - In accordance with the conditions (if any) included in the notification BHP shall be absolutely entitled to rely on the clearances notified by the Ngaanyatjarra Land Council. Neither the Ngaanyatjarra Land Council nor any member of the scouting team are required to disclose to BHP the actual locations of areas of significance or any associated cultural information relating to an area of significance	C	
3.2.1	Register or Sites	In collaboration with relevant cultural heritage custodians, a register of identified tangible cultural heritage features and intangible cultural heritage features and values within the project area will be developed and maintained.	C	All information pertaining the cultural heritage values are maintained in the BHP CHIMS system.
3.2.2	Land Disturbance Permit and Permit to Work Process	The Land Disturbance Permit (LDP) and Permit to Work (PTW) process will be implemented.	C	- Permit to Work 1 was issued 28 October 2022, Permit to Work 2.1 (for low impact activities such as geotechnical assessments and surveys) was approved 28 February 2023. Spatial data for these permits are maintained in the BHP spatial database. - Prior to temporary suspension LADP's were issued for all activities conducted on site with consideration of requirements of the relevant PtW. - In November 2024, WM transitioned to the BHP Global Land Use Permitting System (G-LUP), replacing the LADP system. No work has been conducted onsite without an approved GLUP and no new land access or ground disturbing work has been conducted.

CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.2.3	Ngaanyatjarra Monitors	Up to two monitors will be invited to be present when ground is disturbed for the first time, and to help physically demarcate approved work areas prior to the commencement of works. In addition, Ngaanyatjarra monitors will be stationed at land disturbance activities where there is high risk of cultural heritage material, as deemed necessary by BHP and the Ngaanyatjarra Council, to ensure that clearing and other activities are done in accordance with agreed heritage report requirements, to manage chance finds and to manage other heritage related risks. The Ngaanyatjarra Council has acknowledged that this monitoring may be impractical to implement due to the availability of Ngaanyatjarra People to perform these duties and other constraints. As such, while there is strong intent to implement this monitoring program, the involvement of Ngaanyatjarra monitors is not a strict compliance requirement, however, inviting Monitors to attend is expected.	C	- The requirement for Ngaanyatjarra Monitors to be invited for ground disturbing activities is implemented through the G-LUP system and via three-weekly NgC/BHP meetings. - A total of 130 traditional owners participated in 44 monitoring and engagement events for a total of 1945 hours. For the reporting period, Ngaanyatjarra Monitors have participated as monitors for environmental activities including groundwater monitoring, dust monitoring, rehabilitation works and Great Desert Skink surveys. They have also participated as monitors for disturbance activities as required under LADP/CLUP conditions. During the period there were 59 monitoring events, involving 270 (non-unique) Traditional Owners over 1,878 monitoring hours.
3.2.4	Chance Find Protocol	Through the course of land disturbance activities, sites that have not been previously identified in organised cultural heritage surveys may be encountered or become exposed through the process of excavation. These may include artefacts, skeletal remains or other manifestations of the Tjukurpa. To minimise potential conflict with such sites, a chance find protocol will be developed and implemented with relevant Ngaanyatjarra stakeholders. The chance find protocol is likely to include the following provisions: - Define the types of sites that may be encountered through the process of clearing and ensure that this is included in the site induction and cultural awareness program. - The process to follow if a potential new cultural heritage site is identified in the course of work. Nominally, this process may include: - All work in the immediate vicinity of the remains will cease until further notice, and the BHP representative will be notified as soon as reasonably possible who will issue a Stop Work Order. - The BHP representative will notify the Ngaanyatjarra Council as soon as reasonably possible. - Efforts to protect the remains will be made. Note that the site should not be interfered with or disturbed further, and buffer zones or temporary barriers will be established. - Work may continue at a reasonable distance from the site as determined by the Ngaanyatjarra Council and BHP. - All workforce at the site will be advised that it is an offence to damage sites or interfere with human remains. - Where necessary local Police/Coroner's office will be notified (i.e. in the event that the identified chance find consists of human remains). - A process for resolution will then be agreed between the Ngaanyatjarra Council and BHP, including written permission to re-commence with operations. - Ngaanyatjarra cultural heritage monitors will be invited to be present when ground is disturbed for the first time and when otherwise agreed between BHP and the Ngaanyatjarra Council. - Should a cultural heritage site be identified by chance, reviews of infrastructure design and location would be undertaken in consultation with the Traditional Owners with the objective of avoiding or otherwise minimising direct impacts where possible.	C	- Chance finds awareness training forms part of the West Musgrave induction material - A chance finds procedure is in development in collaboration with NGC. This procedure will include the process nominally outlined in this CHMP. - No chance finds were made during the reporting period. All temporary suspension activities are performed using existing roads and tracks and cleared/partially constructed areas.
3.2.5	Training and Competency	BHP, in consultation with relevant Ngaanyatjarra stakeholders, will coordinate the development of a cultural induction program and a cultural awareness program.	C	- BHP has a cultural induction program (Working on Ngaanyatjarra Lands) that all employees are required to complete prior to visiting West Musgrave. An additional dedicated West Musgrave Cultural induction program is under development by the NGC. - BHP has not yet developed a West Musgrave specific Cultural Awareness Program, however, the Working on Ngaanyatjarra Lands Module, together with BHP's various mandatory, generic cultural heritage management modules, serve this purpose.
		A Cultural Induction Program will be delivered to all workforce attending the WMP. The content of the cultural awareness training will be coordinated by BHP in consultation with the appropriate knowledge holders, and may include: - The significance of cultural heritage to Ngaanyatjarra stakeholders - Relevant cultural heritage legislation - Obligations under this CHMP and Mining Agreement, specifically their responsibilities regarding the protection of identified cultural heritage sites and chance finds - Types of cultural heritage objects and how to identify them - Procedures for reporting new cultural heritage sites and objects.	C	The Cultural and Heritage training and competency requirements of the CHMP are satisfied by the Working on Ngaanyatjarra Lands Module and BHP's various mandatory, generic cultural heritage management modules. This will be further supplemented by the West Musgrave Cultural induction program that is under development by the NGC.

CHMP Reference	Element	Requirement s	Compliance Status	Evidenc e
		A Cultural Awareness Training program will be delivered to all members of the workforce associated with the WMP. The content of the cultural awareness training will be developed in consultation with the appropriate knowledge holders, nominally the Cultural Awareness Program may include: - Cultural awareness - The significance of cultural heritage to Ngaanyatjarra stakeholders - Relevant cultural heritage legislation - Obligations under this CHMP and Mining Agreement, specifically their responsibilities regarding the protection of identified cultural heritage sites and chance finds - Types of cultural heritage objects and how to identify them - Procedures for reporting new cultural heritage sites and objects - A broader understanding of Aboriginal history and the impacts of colonisation, historical legislation and key events that have impacted on Aboriginal societies.	C	- BHP has a cultural induction program (Working on Ngaanyatjarra Lands) that all employees are required to complete prior to visiting West Musgrave. An additional dedicated West Musgrave Cultural induction program is under development by the NGC. - The NgC has not yet completed development of a Cultural Awareness Package, as required by the mining Agreement, However, BHP's Working on Ngaanyatjarra Lands Module, together with BHP's various mandatory, generic, cultural heritage management modules, serve this purpose in the interim. Due to the project being in temporary suspension, no cultural heritage bush trips were conducted during the reporting period.
		BHP recognise the importance of Ngaanyatjarra People's role in communicating how they want their cultural heritage and culture managed as such Ngaanyatjarra People will be invited to participate in the delivery of cultural awareness training (subject to fair and reasonable commercial terms).	C	
3.2.6	Demarcation of Sites	Work Areas: Physical demarcation (where necessary) of work sites will take the form of installing visible markers at regular intervals, so that the boundary of approved work areas can be easily ascertained, and to ensure that no encroachment into identified cultural heritage exclusion zones occurs.	C	- GLUPs require all work areas to be physically demarcated prior to the commencement of work.
		Identified Cultural Heritage Sites: In-field demarcation of cultural heritage sites and places of high cultural value will only be demarcated in accordance with the wishes of Traditional Owners (and as documented in Ngaanyatjarra issued cultural heritage survey reports), or upon advice from relevant Traditional Owners or knowledge holders.	C	- All identified cultural heritage sites within the Development Envelope are physically demarcated via pink and black capped fence droppers. Pegs are located on the buffer area around heritage sites and are regularly audited with the presence of Ngaanyatjarra Monitors. The last audit was completed by Adroit Survey in July 2025. It involved the verification of existing marked buffer areas and the installation of additional pegs where demarcation was not clear. - Location of heritage marker locations are maintained within the BHP CHIMS.
3.2.7	Incidents, Issues, Complaints and Grievance	In the event of a non-compliance with the requirements of this CHMP resulting from monitoring activities or legitimate complaint from a Ngaanyatjarra community member the following incident investigation process will be implemented: - The BHP representative will notify the Ngaanyatjarra Council (nominally the General Manager for Land and Culture) as soon as reasonably possible with details of the incident or complaint (within 12 hours) - Depending on the seriousness of the incident or claim, BHP and the Ngaanyatjarra Council may jointly investigate the incident (a decision to be confirmed by Ngaanyatjarra Council; nominally the General Manager for Land and Culture) - Where required, BHP and the Ngaanyatjarra Council will jointly investigate the incident within 48 hours and a report will be issued within 60 hours of receiving the initial incident notification. - The progress of the investigation will be communicated on a daily basis to other people as nominated by the Ngaanyatjarra Council and BHP - Immediately after issuing the investigation report, corrective actions will commence to improve processes to mitigate the risk of another incident - If negligence or purposeful misconduct is identified through the incident investigation disciplinary action may be taken - In addition, an issues, complaints and grievance system shall be developed to assist with documenting, investigating and responding to complaints made by community groups and stakeholders, and all stakeholder issues and concerns will be proactively addressed.	NR	No non-compliances with the CHMP recorded during the period.
3.2.9	Compliance Register	BHP will maintain a compliance register detailing all legislative commitments that BHP has made in relation to cultural heritage management, this will include any requirements stipulated in a Ministerial Statement relating to this CHMP, any regulatory conditions associated with subsequent mining approvals, the future Mining Agreement (and associated annexes, including the Ngaanyatjarra Council CHMP) and any recommendations made in cultural heritage surveys that are signed and countersigned by relevant parties.	C	- A Heritage Obligations Register, derived from the overall project obligations and legislative commitments, is maintained by the BHP Indigenous Engagement Team. All records relating to cultural heritage and associated obligations are maintained in this register. - All environmental obligations and legislative commitments are maintained in the BHP Environmental Legal Obligations Register (NELOR).

CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.2.10	Information Management	Geospatial data and other information pertaining to the location of exclusion zones and areas cleared for work will be maintained and document controlled in a document control system (Aconex or equivalent). All data generated as part of this CHMP will also be document controlled in a document control system (Aconex or equivalent). It is noted that data pertaining to cultural heritage is of a confidential nature, and as such will only be made available to nominated persons within BHP who have signed confidentiality statements.	C	All data, including spatial, pertaining to cultural heritage is maintained in the BHP CHIMS. This system has restricted access to maintain confidentiality of data.
3.2.12	Support for Cultural Maintenance Activities	Compensation and offset provisions to manage impacts to cultural amenity and cultural associations will be further developed as part of the Mining Agreement between the Traditional Owners, the Ngaanyatjarra Council and BHP	C	The Mining Agreement signed September 2022 provides a comprehensive package of compensation and engagement opportunities to offset impacts to cultural amenity and cultural associations. These include: - Continued funding for the Jameson Indigenous Ranger Program. - A demography project to monitor social and cultural impacts of the WMP. Consultations were undertaken in 2024 to assess social and cultural impacts of the WMP against the 2022 baseline. - Provision of funding for positions within NGC to support successful implementation of the Mining Agreement. The status of positions funded by BHP were as follow: - Mining Agreement Implementation Manager – Ralph Addis (part time) - Mining Agreement Implementation Officer – Erika Smolic - General Manager Land & Culture – Bryony Nicholson - Deputy General Manager Land & Culture – Mark Williams - Cultural Heritage Management Coordinator – Vacant - Jameson Liaison Officer – Elvis McLean - Blackstone Liaison Officer – Winston Mitchell - Business Development Manager – vacant - Support for employment and training with one community member employed during the reporting period by the WMP. - Annual social investment funding jointly allocated by BHP, NGC and the Ngaanyatjarra People. For the reporting period, funds were approved for: Jameson Community - BMX track upgrade \$77,416 - Bobcat and backhoe \$400,850 - Commercial washer and dryer \$33,183 - Water fountains \$80,273 - Community gym \$100,000 Blackstone - Youth and Police art engagement \$117,428.73 Warakurna & Wanarn Community - Rubbish truck and waste bins \$288,102 Wanarn Community - Public laundry \$73,476 Wingellina Community - Chilled water fountains \$86,873 - Solar lights at basketball courts \$16,022 - CDP shed \$90,250



				• Warburton Community - o Emergency power upgrade to airstrip \$23,000 - o Wilurarra Creative & Mirirrtjarra Arts building fit out \$287,148 • Kanpa Community - o Community hall activities \$4,936 • Tjukurla Community - o Multipoint Network and Starlink internet service \$29,569 - o Tipper truck \$120,000 • Tjukayirla Roadhouse electrical and fuel pump upgrade \$312,838
3.3.1	General - Communication	BHP will provide ongoing, regular and timely communication to the Ngaanyatjarra People about the WMP.	C	• CHMDMC was superseded by the Heritage Committee required under the Mining Agreement. • There were no Heritage Committee meetings held during the reporting period due to the temporary suspension of the project. • Liaison Committee meetings were held on 30 July 2025 and 25 March 2026 • An oversight Committee meeting was held on 1-2 December 2025.
3.3.2	Consultation Register	A consultation register will be maintained to record specific consultation activities relating to cultural heritage protection, incidents or otherwise. This consultation register will include details of consultation activities undertaken, details of people consulted, details of consultation outcomes and any actions that arose as a result of that consultation event. The consultation register will likely form part of the 'incidents, issues, complaints and grievances' system and be reviewed at CHMDC meetings.	C	• BHP maintains a Community Engagement register that captures all engagement between Ngaanyatjarra people and WMP Personnel. This register captures sentiment from any given engagement. • All consultations relating to cultural heritage protection activities are maintained the BHP CHIMS.

CHMP Reference	Element	Requirements	Compliance Status	Evidence
3.3.3	CHMP Consultation	Central to consultation relating to this CHMP is the establishment of the CHMD or equivalent of relevant stakeholders. One role of the CHMDC will be to ensure the regular flow of information pertaining to the implementation of the CHMP (and other matters). The CHMDC will meet monthly unless otherwise agreed. In the event of a serious breach of the provisions of this CHMP, an emergency meeting of the CHMDC will be called. Consultation with CHMDC and other Ngaanyatjarra stakeholders to this CHMP will occur both at key milestones and at a schedule agreed by the CHMDC throughout the life of the project. These milestones include: - Change of project phases (exploration and studies, construction, operations and closure) - At an ongoing schedule to be agreed by the CHMDC (and as defined in the Mining Agreement) - Ongoing through the incidents, issues, complaints and grievances process.	C	- In place of the CHMDC, BHP has established the Heritage Committee as required under the Mining Agreement. This CHMP is reported on as a part of the agenda for the Heritage Committee Meetings. - Due to the project being in temporary suspension, there have been no meetings of the Heritage Committee for the reporting period. - Topics that would have been covered in the Heritage Meeting are addressed in the three-weekly NgC-BHP meeting routine.
		Reporting of consultation outcomes will include: - A record of meeting minutes of meetings relating to this CHMP. - Annual reporting to the Board of the Ngaanyatjarra Council by the CHMDC regarding the status of this CHMP - The incidents, issues, complaints and grievance register - All consultation records will be recorded in a document management system (e.g. Landfolio Land Management System, or equivalent).		
		A nominal standing agenda for CHMDC Meetings relating to the management of cultural heritage (including this plan) includes: - Apologies, confirmation of attendees, confirmation of minutes - Health and safety - Action review - Review of LDPs issued, status etc. - Chance finds, discovery of potential skeletal remains, Tjukurrpa event - Incidents, breaches, concerns raised (including emerging environmental concerns, including the potential for compliance breaches) - Review of Ngaanyatjarra Access Plan - Compliance register review - Confirmation of actions arising, allocation of tasks and due dates - Other business, next meeting date	C	The standing agenda for heritage meetings would include updates on land disturbing activities (G-LUP) chance finds, any cultural heritage related incidents and review of the CHMP.
		The membership of the CHMDC may include: - Senior Ngaanyatjarra cultural knowledge holders/traditional owners for the WMP area - BHP most senior on-site manager - BHP most senior on-site community relations advisor/manager - Ngaanyatjarra Council General Manager Land and Culture (Ngaanyatjarra Council) and/or Ngaanyatjarra Council Principal Anthropologist (Ngaanyatjarra Council)	C	- In place of the CHMDC, BHP has established the Heritage Committee as required under the Mining Agreement. This CHMP is reported on as a part of the agenda for the Heritage Committee Meetings. - Due to the project being in temporary suspension, there have been no meetings of the Heritage Committee for the reporting period. - Topics that would have been covered in the Heritage Meeting are addressed in the three-weekly NgC-BHP meeting routine.
4.2	CHMP - Review	This CHMP will be reviewed annually (unless otherwise agreed by the CHMDC) following the signing of the Mining Agreement and prior to moving between project phases e.g. construction, operations and closure. This CHMP may also be reviewed should any of the following occur: - Change of project phase e.g., construction to operation, and operations to closure - If a significant incident occurs related to the protection of cultural heritage - If the CHMDC request that a review is undertaken due to a relevant concern (subject to the outcomes of an incident/complaint investigation) - Following completion of the Ngaanyatjarra Council's Cultural Geography Project - If relevant State or Commonwealth legislation or policy requirements are updated or amended in relation to Aboriginal Heritage - If the project scale and/or configuration changes in such a way that it materially changes the existing risk profile of the project and/or introduces additional potential impacts not previous considered/assessed. Any changes to this CHMP will involve consultation with the Ngaanyatjarra Council and may require approval from the EPA.	C	The Mining Agreement, effective 22 September 2022, requires an update of the NgC CHMP appended to this CHMP. This update of the NGC CHMP is in progress by NGC, and BHP is currently awaiting a draft by the NgC. Once complete, the NGC CHMP will be used to inform a review of this CHMP by BHP.
4.3	Independent Peer Review	Where requested by the CHMDC, this CHMP will be independently audited or peer reviewed to validate the effectiveness of this CHMP, and to make suggestions for improvement within the scope of the EP Act	NR	No request for peer review to date.

CHMP Objective Based EMP Audit Table

EPA Factors: Social Surroundings Key Environmental Values: Cultural heritage sites, and to the degree possible the broader landscape in which these sites reside Key Impacts and Risks: • Direct and unauthorised impacts to cultural heritage sites (e.g. Tjukurrpa sites) • Constrain or otherwise changes the nature of land access to cultural heritage sites or areas of the landscape used for customary uses by Traditional Owners • Indirect impacts to cultural heritage sites through: – The deposition of unacceptable levels of dust. – Reduced amenity associated with noise.					
Management Action	Management Target(s)	Monitoring	Reporting	Compliance Status	Evidence
Management Objective: Avoid and minimise direct impacts to potential cultural heritage sites					
• Comply with Ngaanyatjarra Council issued cultural heritage survey reports, the Ngaanyatjarra Council CHMP (Version O, 18 October 2021) and this CHMP. • All currently identified cultural heritage exclusions zones have been excluded from the Development Envelope and as such direct impacts to these sites will be avoided unless otherwise agreed with the Ngaanyatjarra Council. • Unless otherwise agreed with the Ngaanyatjarra Council, heritage sites will be avoided and will be demarcated by Ngaanyatjarra People, by way of invitation to the Ngaanyatjarra Council, or as requested by the Ngaanyatjarra Council. Demarcation will be done using highly visible materials and where necessary physical barriers to avoid disturbance. • Prior to the commencement of any clearing works, the Aboriginal Sites and Objects Register will be reviewed by BHP as part of the LDP process and applied, and a PTW will be sought and issued by the Ngaanyatjarra Council. • BHP will appoint a Cultural Heritage Management expert for the duration of the project (prior to the commencement of construction until 3 months after the commencement of operations). • As project definition increases, further site-specific cultural heritage surveys will be commissioned through the Ngaanyatjarra Council, to manage any uncertainties, and to ensure cultural associations are maintained and appropriate protection is afforded to cultural heritage sites. • The development footprint and land clearance areas will be oriented to avoid archaeological sites where practicable • Convene and resource, on a monthly basis, or unless otherwise agreed with the Ngaanyatjarra Council, the Cultural Heritage Management Decision Making Committee (CHMDC) (Section 3.3.3). • Where cultural heritage survey gaps exist, commission Ngaanyatjarra Senior Knowledge Holders and Traditional Owners, through the Ngaanyatjarra Council, to undertake heritage surveys prior to undertaking works (project works will be oriented around cultural heritage wherever possible). • Implement the Ngaanyatjarra Council's Permit to Work (PTW) procedure. Record compliance within the WMP document control system (Aconex or equivalent).	Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area	Annual review of survey data and imagery	• Internal Land Disturbance Register • During construction a quarterly report (or similar, to be agreed with the Ngaanyatjarra Council) will be provided to the Ngaanyatjarra Council and CHMDC that includes maps showing cleared areas, PTW under application, PTW under activity, heritage cleared areas (or to be where a clearance request is pending), exclusion zones and cultural heritage sites, the Development Envelope and a list of live and pending tenements. • Quarterly heritage clearance reconciliation reports to be provided to the Cultural Heritage Management Decision Making Committee (CHMDC) (Section 3.3.3) at their monthly meetings, and to the Ngaanyatjarra Council. • Mining Rehabilitation Fund (MRF) annual reporting. • Register of invitation to the Ngaanyatjarra Council, and of Ngaanyatjarra People detailing numbers of invitations to participate and numbers of people involved with specified monitoring and management activities. • Where breaches of these management actions are identified, an event report will be developed and communicated with the CHMDC and Ngaanyatjarra Council with agreed remedial actions (Section 3.2.7). All events, issues and non-compliances will be maintained in a register that will be reviewed by the CHMDC as per the CHMDC standing agenda in Section 3.3.3. • A summary of audit numbers will be provided in the WMP Compliance Assessment Report, and a description of any nonconformances to these management actions. • Annual WMP Compliance Assessment Report (including a summary of the operation of the CHMDC and any material matters raised as they may be relevant to this CHMP) submitted to the EPA. • BHP will provide the Annual WMP Compliance Assessment Report and all related environmental management and monitoring reports and associated raw data to	C	• BHP Disturbance spatial data is reviewed annually. There was no new disturbance for the reporting period.
	• No unauthorised direct impacts to cultural heritage sites including archaeological sites. • 100% compliance with the Ngaanyatjarra Council CHMP, Cultural Heritage Survey Reports and Ngaanyatjarra Council issued PTW (including any requirements for demarcation). • Contract provisions for all BHP contractors will require compliance to this plan, and failure to comply will result in formal contractual consequences. • Demarcation of cultural heritage sites to be maintained in good order. • The cultural heritage management expert meets with the NgC General Manager of Culture and Heritage at least once per month. • At least four meetings of the CHMDC are held annually, or otherwise as agreed by the CHMDC. • Representative(s) from BHP senior executive (CEO and direct reports) and/or members of the BHP board of directors will meet with the CHMDC and/or Ngaanyatjarra People, the Ngaanyatjarra Council and Ngaanyatjarra	• All activities undertaken for the project must have an approved PTW or LDP defining allowable work areas before activities commence. Each PTW and LDP will clearly identify the work area and conditions under which the activities can be executed. These conditions will ensure compliance with any directions given in the Mining Agreement (once in effect), Ngaanyatjarra Council issued cultural heritage survey reports and the Ngaanyatjarra Council CHMP. • Compile and maintain records of invitation to the Ngaanyatjarra Council, and of Ngaanyatjarra People involvement in the monitoring activities as specified in this CHMP. • Annual review of internal land disturbance register and spatial data against exclusion zones and the requirements of Ngaanyatjarra Council issued cultural heritage survey reports. • No less than 20% of all issued LDPs are to be audited for those years where LDPs are issued. • Quarterly reconciliation of cleared areas and Development Envelope against Ngaanyatjarra Council issued cultural heritage survey reports and PTW during construction, and annually thereafter. Reports to provide details of any 'chance finds' and the subsequent actions taken. Reports to be signed off by WMP General Manager. Ngaanyatjarra People, through the Ngaanyatjarra Council, will be invited to participate in the reconciliation actions on fair and reasonable commercial terms. • Joint environmental monitoring (BHP		C	• All project related disturbance is within LADP/GLUP and PtW boundaries as verified by ongoing, automated review of survey data and imagery Within the G-LUP/WAN Maps GIS applications. • During the reporting period, a total of 130 traditional owners participated in 44 monitoring and engagement events for a total of 1945 hours. • Compliance with individual GLUPs is verified through inspections and audit schedules to verify compliance with conditions and close out of works. A summary of audits and actions raised are maintained in the BHP Event Management System. • Cultural heritage sites within the Development Envelope are physically demarcated and regularly audited with all data of peg location maintained in the BHP CHIMS. • There have been no unauthorised of direct impacts to cultural heritage sites during the reporting period. • There were no Heritage Committee Meetings held for the reporting period. However, heritage related issues have been communicated through three-weekly NgC-BHP liaison meetings. • Heritage meetings have been discontinued during temporary suspension, with all issues being covered by the existing meeting routine.

- Project personnel do not undertake activities outside designated work areas (ground disturbing or non-ground disturbing). - Jointly with the Ngaanyatjarra Council, BHP will work towards developing and commissioning a geofencing system which ensures that work activities are undertaken within defined PTW areas and away from cultural heritage exclusion zones, unless otherwise agreed with the Ngaanyatjarra Council. Geofencing equipment will be checked as part of daily pre-start inspections and will be fully maintained. The efficacy of the geofencing system will be regularly assessed in consultation with the CHMDC. - Up to two Ngaanyatjarra People will be invited to be present to monitor work activities when ground is disturbed for the first time, and to help physically demarcate approved work areas prior to the commencement of works. In addition, Ngaanyatjarra monitors will be stationed at land disturbance activities where there is high risk of cultural heritage material, as deemed necessary by BHP and the Ngaanyatjarra Council, to ensure that clearing and other activities are done in accordance with agreed heritage report requirements, to manage chance finds and to manage other heritage related risks. Monitoring will also be undertaken by Ngaanyatjarra People at other times when reasonably requested by the Ngaanyatjarra Council. - Design, implement and review (at least annually), with the Ngaanyatjarra Council, a cultural heritage spatial data management system. Cultural heritage exclusion zones, and/or areas considered at high-risk of containing cultural heritage sites, and related obligations, to be maintained in this spatial data management system for use in infrastructure design, layout planning, construction and operation. - Should removal or destruction of archaeological and/or other cultural heritage sites be required it will be done in accordance with the wishes of the relevant Traditional Owners, the approval of the Ngaanyatjarra Council and in accordance with the WA Aboriginal Heritage Act (or as updated).	Council Board members at least annually. - Ngaanyatjarra People, through the Ngaanyatjarra Council, are invited to monitor all WMP work activities when ground is disturbed for the first time (unless otherwise agreed between BHP and the Ngaanyatjarra Council). - Ngaanyatjarra People will be invited to participate in heritage and environmental monitoring on fair and reasonable commercial terms. - Where specified in this Plan, BHP will facilitate Ngaanyatjarra People invitations to undertake monitoring.	and Traditional Owners, through the Ngaanyatjarra Council) of the WMP on agreed commercial terms, noting that joint monitoring may sometimes not be possible due to lack of availability of Ngaanyatjarra People. - Quarterly physical inspections, and or by other means, of the Development Envelope boundary, cultural heritage exclusion zones and cultural heritage site boundaries by Traditional Owners and the Ngaanyatjarra Council, arranged through the Ngaanyatjarra Council and resourced by BHP, unless otherwise agreed between the Ngaanyatjarra Council and BHP. - Review of any changes to, or non-compliances with, the WMP Heritage Commitments, Compliance and Obligations Table to be undertaken at each CHMDC meeting. This table will be jointly established by the Ngaanyatjarra Council and BHP. - BHP and the Ngaanyatjarra Council will audit WMP compliance with Ngaanyatjarra Council issued PTW conditions during and at the completion of the authorised works. - The CHMDC will discuss and monitor the effectiveness of the Management Actions (Table 7) and Mitigations (Table 5) and discuss and record lessons learned to support improved cultural heritage management practice across the life of the WMP. This will be a standing agenda item of the CHMDC.	the Ngaanyatjarra Council at the same time the report is sent to EPA. BHP will also provide any data and reports to the Ngaanyatjarra Council as reasonably requested by the Ngaanyatjarra Council. - Ngaanyatjarra Council may also provide a report to the EPA pertaining to the operation of the Ngaanyatjarra Council's CHMP (however, it is noted that this is outside of the EPA's regulatory compliance requirements). - Review and document the status of implementation of the indirect impact mitigation measures until such time as all the committed mitigation measures have been implemented or are otherwise considered no longer relevant by the Ngaanyatjarra Council.		
Implement a 'chance find' procedure (will form a condition of LDPs) developed and agreed with the Ngaanyatjarra Council, and managed within the WMP document control system prior to construction commencement and through all project phases thereafter (Aconex or equivalent). The purpose of the chance find procedure is to outline the process that must be followed by BHP in the event of discovery of cultural heritage material (including skeletal remains) during or immediately prior to land disturbance activities.	Minimise direct impacts on yet to be identified cultural heritage sites (i.e. chance finds)			C	- Chance finds awareness training forms part of the West Musgrave induction material. - A chance finds procedure is in development in collaboration with NGC. This procedure will include the process nominally outlined in this CHMP. - No chance finds were made during the reporting period.

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Management Objective: Maintain access to cultural heritage sites, or areas of the landscape used for customary uses by Traditional Owners					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- In consultation with Traditional Owners develop and/or maintain access that enable safe and ongoing access to identified cultural heritage sites and areas of the landscape used for customary practices by Traditional Owners - In collaboration with Traditional Owners and the Ngaanyatjarra Council enable safe, timely and ongoing access through BHP tenements for Ngaanyatjarra People. This will include the establishment of new access tracks, facilitating access for Ngaanyatjarra People through the Development Envelope and ensuring that Ngaanyatjarra People can expeditiously (within 60 minutes) open (or have opened for them) locked gates and areas that require access passes, if safe to do so. - Ngaanyatjarra Access Plan will be jointly drafted and implemented with the Traditional Owners and Ngaanyatjarra Council - BHP will, on request from the Ngaanyatjarra Council, facilitate access to the Development Envelope and project area for Ngaanyatjarra Council staff and Ngaanyatjarra People subject to reasonable health and safety requirements. - During closure planning, access considerations will be undertaken jointly with Traditional Owners, through the Ngaanyatjarra Council. - Alternate tracks will be developed jointly with Traditional Owners and the Ngaanyatjarra Council to ensure that access to sites, and movement through the landscape remains as uninhibited as possible, noting that some Traditional Owners have nominated specific locations for alternative access tracks.	Agreed access plan with the Ngaanyatjarra People, through the Ngaanyatjarra Council, and compliance with that Plan. Ngaanyatjarra Access Plan to be agreed prior to the commencement of construction activities.	As-built track observation. The CHMDC will monitor the implementation of the Ngaanyatjarra Access Plan as a standing agenda item.	- WMP Compliance Assessment Report - Where breaches of management actions relating to access are identified, an incident report will be developed and communicated with the CHMDC and Ngaanyatjarra Council with agreed remedial actions (Section 3.2.7). All incidents, issues and non-compliances relating to access will be maintained in a register that will be reviewed by the CHMDC as per the CHMDC standing agenda in Section 3.3.3.	C	- Mining Agreement includes provision that access must not be restricted to the Agreement Area except where reasonably required to ensure safety. Access restrictions only apply to specific areas to protect people and property. These areas are agreed through the West Musgrave Shared Access Plan. - Roads and access tracks within the Development Envelope that BHP are permitted to use are maintained in the BHP spatial database.
Management Objective: Avoid and minimise indirect impacts to potential cultural heritage sites					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
Implement the mitigation measures for indirect impacts to cultural heritage sites detailed in Table 5	Implementation of the indirect impact mitigation and management measures described in Table 5.	Review and document the status of implementation of the indirect impact mitigation measures until such time as all the committed mitigation measures have been implemented or are otherwise considered no longer relevant by the Ngaanyatjarra Council.	A summary of the outcomes of the review is to be provided in the WMP Compliance Assessment Report	C	See evidence presented in reference to CHMP section 1.7.1.4., above.

Management Objective: Increase project team cultural awareness and of the requirements for cultural heritage protection at the West Musgrave Project					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Develop a site induction package to all persons working on or visiting the WMP, that addresses key requirements of this CHMP, that has been developed with and agreed by the Ngaanyatjarra Council and has been recorded within the WMP document control system (Aconex or equivalent). - Implement a site induction package that addresses key requirements of this CHMP. - Develop a cultural awareness package that addresses key requirements of this CHMP, and other elements that contribute to cultural competency of WMP workforce that has been developed with and agreed by the Ngaanyatjarra Council and has been recorded within the WMP document control system (Aconex or equivalent). - Implement a cultural awareness training program for all permanent workforce and regular visitors to the WMP ((Note: permanent is defined for the purpose of this management plan as a person (employee or contractor) that attends site more than three times or plans to reside onsite for a period of greater than three months). - BHP will invite Ngaanyatjarra People, through the Ngaanyatjarra Council, to deliver the cultural awareness package, and the cultural heritage aspects of the site induction package. When that invitation is accepted, BHP will pay reasonable costs for Ngaanyatjarra People or Ngaanyatjarra Council representatives to deliver these packages. - BHP, with the Ngaanyatjarra Council, will jointly develop and implement a cultural heritage communication and information plan (unless otherwise agreed). This plan will (but not be limited to) establish points of contact and communication in the Ngaanyatjarra Council and BHP, what sort of information will be communicated and shared between BHP, the Ngaanyatjarra Council and Ngaanyatjarra People, methods and styles of communication, roles and responsibilities.	All project personnel remain within designated cleared areas as defined in Ngaanyatjarra Council issued cultural heritage survey reports	- Induction records confirm that all personnel are inducted prior to the commencement of site-based work, for all persons attending the WMP. - Training records confirm that all permanent workforce, which includes employees, contractors, and sub-contractors associated with the WMP have undertaken the cultural awareness training program within six (6) months of commencement of employment at WMP. Note: permanent is defined for the purpose of this management plan as a person that attends site more than three times or plans to reside onsite for a period of greater than three months.	- A summary of the number of people who have undertaken site inductions and the cultural awareness training will be provided in the WMP Compliance Assessment Report - A summary of the number of people who are eligible to undertake site inductions and the cultural awareness training, relative to the number of people who have undertaken the inductions and training will be provided to Ngaanyatjarra Council on a quarterly basis or as reasonably requested.	C	- BHP has a cultural induction program (Working on Ngaanyatjarra Lands) that all employees are required to complete prior to visiting West Musgrave. An additional dedicated West Musgrave Cultural induction program is under development by the NGC. - BHP has not yet developed a West Musgrave specific Cultural Awareness Program, however, the Working on Ngaanyatjarra Lands Module, together with BHP's various mandatory, generic, cultural heritage management modules, serve this purpose. - Due to temporary suspension, no cultural awareness bush trips were undertaken in the reporting period.
	Ngaanyatjarra People to be invited to participate in the delivery of the heritage management aspects of site inductions, cultural awareness training and deliver those aspects of the induction and the cultural awareness training (subject to fair and reasonable commercial terms).Cultural awareness training and cultural induction program to commence prior to the commencement of operations All permanent workforce and regular visitors to the WMP receive cultural awareness training and cultural induction				
	Build cultural awareness within project personnel				
	No breaches of the CHMP				

Management Objective: Provide a mechanism to allow for community feedback relating to any issues, complaints and grievances					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
An issues, complaints and grievance system shall be developed to assist with documenting, investigating and responding to complaints made by community groups and stakeholders, and all stakeholder issues and concerns will be proactively addressed	To acknowledge receipt of any feedback within two days of receiving the feedback. To provide a response within two weeks to the community group or stakeholder providing the feedback.	The CHMDC will review the issues, complaints and grievance system as a standing agenda item.	A summary of the outcomes of the review is to be provided in the WMP Compliance Assessment Report.	C	- West Musgrave developed a dedicated grievance procedure in May 2024. In January 2025, West Musgrave transitioned to the BHP WAN Sentiment Management Procedure (applies to the whole of WA Nickel) with the transition into temporary suspension. Prior to this BHP used the framework provided in the draft West Musgrave Stakeholder Engagement Plan to address any complaints or grievances. - There were no grievances or complaints recorded for the period.

A3. APPENDIX 3 – AUDIT FINDINGS FOR FVMP IMPLEMENTATION

Flora and Vegetation Management Plan Audit Table

FVMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 7: Minimisation Measures for Direct Impacts to Priority Flora	A considerable effort has been made to reorient and reduce the size of Development Envelope to avoid impacts to environmental values. This has included a reduction of the Development Envelope from 25,200 ha to 21,679 ha (13.3 percent reduction), and of the disturbance footprint from 3,961 ha to 3,830 ha resulting in the exclusion of some significant species (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occurs). Under Attachment 1 to MS1188 (s45 C amendment) the clearing footprint has been increased from 3,830 ha to 4,213.3 ha.	C	Clearing is less than the approved amount and is all within the approved Development Envelope. The last clearing was conducted in October 2024 to allow construction of the East-West Track to help safeguard heritage values and was in preparation for placing the project into temporary suspension. Cumulative clearing as of 20 April 2026 is 617.5 ha, unchanged from the previous year.
		Project footprint will be designed to avoid priority and significant flora populations where possible	C	- Before entering temporary suspension records of Priority flora locations were entered into the Project's ArcGIS Online (AGOL) based Land Access and Disturbance Permit (LADP) system. This has now been transitioned to the BHP Global Land Use Permit System (GLUP). Land disturbance activities are designed, authorised and controlled to avoid priority and significant flora populations. No priority flora species have been disturbed to date. - Exclusion zones around priority species and P1 species proximate to work areas are demarcated in the field by blue/white star picket markers. Records of all significant and priority flora populations are maintained in the BHP spatial database.
		Clear demarcation would be erected around Priority 1 species where possible, including <i>Aenictophyton anomalum</i>	C	- Priority flora is recorded in the BHP Geographic Information System (GIS) and no Priority flora species have been cleared to date. LADPs previously issued for works on or near <i>Aenictophyton anomalum</i> populations had clear conditions to avoid, noting these works have been largely non-ground disturbing to date. There are currently no GLUPs in place that authorise the clearing of vegetation. <i>Aenictophyton anomalum</i> populations are demarcated in the field whereby surrounding exclusion areas have been pegged using environmental pegs (blue and white striped caps on fence droppers) Before entering temporary suspension pegging of environmental values was conducted by survey methods and locations uploaded in the central WMP GIS database for auditing purposes. This database is currently maintained and has been transitioned to a WAN database. - There are currently no GLUPs in place that authorise ground disturbing works in proximity to <i>Aenictophyton anomalum</i> populations.
		Land clearing would be kept to the minimum necessary for development of the proposed project, and avoid, where possible, Priority 1 species exclusion areas	C	- No clearing has occurred within flora exclusion areas. During construction the extent of clearing was verified monthly by survey methods and records are retained in the BHP GIS database. - Pegging of environmental values was conducted by survey methods and locations uploaded in the central BHP GIS database for auditing purposes. Exclusion areas around priority species (50 metres for P1 and 30 metres for P3) were reviewed when reviewing LADP applications and regularly as part of an automated geometry check function using the electronic LADP system. Since no clearing occurs during temporary suspension, this system has been paused. - There are currently no GLUPs authorising clearing.
		Develop and implement a site-specific internal land access and disturbance procedure and associated permit to prevent clearing outside approved boundaries	C	- Until temporary suspension, all clearing was authorized and controlled under Land Access and Disturbance Permits (LADP). - The LADP system has been replaced by WAN's G-LUP system. - There are currently no GLUPs authorising clearing.
		Known locations of Priority and significant flora species are included in the site's GIS database to ensure locations are avoided where possible during future activities	C	- Spatial data associated with Priority and significant flora species is maintained in BHP GIS database. - Exclusion zones around priority species and P1 species proximate to work areas are demarcated in the field by blue/white star picket markers.
		Where practicable, land clearing would be undertaken progressively with the amount of active disturbance minimised	C	- Land clearing is minimised to the areas needed for development, and is postponed to the time of active development, where possible. - No clearing was conducted during the reporting period. Total clearing is 617.5 Ha. - The approved clearing footprint is 4,213.3 ha. Areas not required for construction in the long term have not been cleared during the reporting period. - Clearing minimisation would be conditioned in the G-LUPs. There were no

				approved GLUPs during the reporting period. Records of clearing are maintained in the WAN Maps GIS system. No excursions from approved clearing areas were detected.
		Existing disturbed areas would be used wherever possible to minimise total ground disturbance	C	- Already disturbed areas are re-used wherever practicable to minimise ground disturbance. Existing roads, tracks and bore pads are being used where practicable. The area disturbed for the exploration camp, which sits in the footprint of the future waste rock dump (WRD), is now being re-purposed for logistics, lay-downs, waste management and workshops. - The East-West Track that was developed prior to entering temporary suspension to help safeguard heritage values by closing some existing tracks in their proximity, was mostly constructed on land previously cleared for construction of utilities corridors, thus minimising the amount of clearing required.
		The site induction program would provide information on priority species, exclusion zones and ground disturbance authorisation procedures	C	Site induction includes the importance of remaining within areas approved for land access and disturbance. It explains the requirement for a GLUP before entering land.
		Progressive rehabilitation would be undertaken on disturbed areas as they become available	C	- Due to the project being in construction, rehabilitation is largely not relevant. Where possible, bore pads and geotechnical testing disturbance areas have been rehabilitated prior to entering temporary suspension. - No rehabilitation was performed during the reporting period.
		Topsoil and vegetation (including woody debris) would be re-spread over rehabilitated areas to act as a seed source and to protect the soil from erosion	NR	No rehabilitation was performed during the reporting period.
		Local provenance seed and propagated material would be used, if required, to rehabilitate disturbed areas	NR	Scoping of a potential seed collection program was previously initiated between BHP, NgC and botanists. Due to the project entering temporary suspension, these initiatives have been paused awaiting a decision on the future of the Project.

FVMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 8: Minimisation Measures for Indirect Impacts to Priority Flora	Firefighting equipment would be located on site and emergency personnel would be trained in fire response	C	- Daily vehicle and mobile plant pre-start inspection checks include checks of in-vehicle fire extinguishers. - ERT training schedule includes fire and rescue and is undertaken on a weekly basis. - The Bushfire Management Plan (WM-0000-WHS-PLN-0009) was issued for use on 18 October 2024.
		Vehicles to keep to access tracks or cleared areas wherever practicable	C	- Conditions of the previous LADPs and current GLUPs reflect this requirement. - This requirement also forms part of all site inductions and the mandatory code of conduct for all drivers attending the site.
		A Hot Work Permit system would be developed and implemented	C	- All hot works outside designated workshop areas are subject to first obtaining a hot works permit. - No hot work has been performed outside workshop areas since entering temporary suspension. - During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable.
		All machinery and vehicles undertaking clearing activities would be fitted with firefighting equipment	C	Daily vehicle and mobile plant pre-start inspection checks include checks of in-vehicle fire extinguishers.
		Fire management practices would be made in consultation with the Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council (NGC) including installation and maintaining firebreaks if required, so that potential environmental damage from extreme and out of control wildfires is minimised, and infrastructure and the community are protected throughout the life of the project	C	- Arrangements to minimise the potential environmental harm from bushfires are contained in the Bushfire Management Plan (WM-0000-WHS-PLN-0009), that aligns with relevant DFES standard operating procedures. - Records of correspondence with DFES and the NgC are maintained in the BHP SharePoint system and informed the development of fire response planning. - Specifications for the establishment and maintenance of firebreaks are contained in the Bushfire Management Plan - A memorandum of understanding for Mutual Support in Planning and Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022 but was cancelled on 21 October 2024 as a result of the capability reduction the Project with the commencement of Temporary Suspension.
		The project site induction would include information on prevention and management of fires	C	Information on prevention and response to fires is contained in the site induction material, which is required to be completed by all personnel prior to arriving at site.
		A vehicle hygiene procedure would be implemented for vehicles and equipment coming on to, or returning to, the site for earthmoving	C	- In accordance with the WMP Weed Management Procedure, a weed hygiene procedure has been implemented that requires cleaning of all vehicles and mobile plant before coming to site, details of which are recorded in the Weed Hygiene form. - When arriving on site, all vehicles and mobile plant are inspected again to confirm adequate weed hygiene. If suspected weed or seed material is detected, the material must be manually removed and presented for reinspection before being permitted to move around the WMP site. - For vehicles bought in from other states, appropriate DPIRD biosecurity clearance information is required before the vehicle/mobile plant is used on site. - Weed hygiene inspection records are maintained in the BHP document management system and an inspection sticker is affixed to each vehicle for auditing purposes.

FVMP Reference	Element	Requirements	Compliance Status	Evidence
		Weed control would be implemented on areas to be disturbed for infrastructure	C	- A baseline weed survey was conducted prior to construction commencement (October 2022), which found that weeds were largely located on pre-disturbed areas (roads, access tracks, accommodation village) Two weed species were encountered during the field assessment. These included 266 locations with an estimated 4,661 records of <i>Cenchrus ciliaris</i> (Buffel Grass), and one location represented by 1 plant of <i>Tribulus terrestris</i> (Caltrop). Eradication of buffelgrass was not considered feasible due to its widespread occurrence in the wider region. - Given the absence of weeds detected in previously undisturbed areas, no weed control measures were undertaken within undisturbed areas to date.. Weed control of any areas subject to weed infestations, either pre or post disturbance is conducted. - Western Botanical completed an additional baseline weed survey in accordance with the FVMP in May 2023. In addition to Buffel grass and Caltrop, the following weed species are present on site: <i>Citrullus colocynthis</i> – Paddymelon <i>Rumex vesicarius</i> – Ruby Dock <i>Hypochaeris radicata</i> – Flat Weed / Hairy Cats Ear <i>Malvastrum Americanum</i> – Spiked Mallow <i>Erodium aureum</i> – Golden Herons-bill / Stroks Bill / Pinweed / Redstem <i>Chloris virgata</i> – Feathertop Rhodes Grass <i>Brassica tournefortii</i> – Mediterranean Wild Turnip - Western Botanical, undertook follow-up surveys in May 2024 and August 2025. During the 2024 survey a new weed, <i>Aerva javanica</i> – Kapok, was identified on site. It was not found during the 2025 survey. Two plants were however again detected in June 2026 (outside the reporting period) and management measures are being adapted to deal with this. - A weed control program was initiated in Q1 2024 to align with the flowering period and optimal chemical treatment window. Weed control interventions during the reporting period consisted of the chemical treatment and physical removal of Paddy melon (<i>Citrullus colocynthis</i>), treatment of internal roads and drains and freshly disturbed areas to minimize colonization of existing weeds in March 2024. - Herbicide application was again done in March 2025. From March 2026, a biannual herbicide application program (March, September), has been adopted, especially to improve the efficacy of buffel grass control.
		A weed control management plan would be developed to manage known weed infestations and prevent their spread	C	During the reporting period the weed management program has been escalated from annual to biannual herbicide application. If focusses on roadsides, the previous Exploration Camp area, disturbed areas associated with laydown, tracks and quarries. The CASA-certified aerodrome is included in the program, with a strong focus on total vegetation control areas surrounding the runway.
2.3.1	Reporting Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in section 2.3 of the FVMP will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring.	C	The 2025 Western Botanical annual weed survey results were shared with the NgC in regular Environment & Approvals meetings with NgC and BHP.
2.3.2	Compliance Reporting	BHP will prepare Annual Environmental Reports (AERs) to be submitted to regulatory authorities.	C	- The third report was submitted to the DEMIRS in August 2025. - A Biennial Environmental Report under the Part V licence was not due in the reporting period.
		A Compliance Assessment Report (CAR) will be submitted to the Compliance Branch at Government of Western Australia's Department of Water and Environmental Regulation (DWER) at an agreed date.	C	This document forms part of the fourth CAR that is due on 20 July 2026.
3.1	Management Review	The FVMP will nominally be reviewed at least every three years from the date of endorsement to ensure that it reflects the current situation with regards to WMP flora management and monitoring.	C	A review of the FVMP has been completed by the NgC during the reporting period, and revision of the document is in the process of being finalised.

		The FVMP may also be reviewed should any of the following occur: • A change in conservation rating of any flora species known to occur in the project area (e.g. the addition of new species and/or an increase or decrease in the conservation rating of any species) • The addition or change of infrastructure within WMP that has the potential to significantly change the predicted direct or indirect impacts on Priority flora species, and that was not approved within the scope of the project • Any change in operational practices on site that has the potential to significantly change the predicted direct or indirect impacts on Priority flora species, and that was not approved within the scope of the project.	C	• Review of the FVMP is currently being finalised which incorporates new knowledge from additional targeted flora surveys undertaken in 2023 and 2024 by Western Botanical and captures additional surveys that were conducted along the proposed Northern Access Road. • There have been no footprint changes in the project in the reporting period. • A revised plan will be submitted to EPA prior to a potential restart of the project.
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FVMP Objective Based EMP Audit Table

Management Objective: Minimise requirements for land clearing and associated loss of priority flora species Key Impacts and Risks: Project-related clearance of priority flora species, resulting in a change in their conservation status					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Land disturbance kept to the minimum necessary for development of the project - Develop and implement a site-specific internal clearing/disturbance procedure and associated land access and disturbance permit (LADP) - Where practicable, land clearing undertaken progressively with the amount of active disturbance minimised - Existing disturbed areas used wherever possible to minimise total land disturbance	- Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area - Disturbance of Priority flora species populations avoided wherever practicable, and otherwise minimised	- Annual review of land disturbance- related survey data, and comparison with project-related land disturbance on the respective year's aerial imagery, relative to the approved area of project-related land disturbance - Annual review of internal project- related land access and disturbance register relative to actual project-related land disturbance and LADPs	- Internal project-related Land Access and Disturbance Register and LADPs - Mining Rehabilitation Fund (MRF) annual reporting - Annual WMP Compliance Assessment Report - Details (locations and species) of additional priority flora species populations to be forwarded to the DBCA within 6 months of discovery	C	- Land clearing is minimised to the areas needed for development, and is postponed to the time of active development, where possible. - No clearing was done during the reporting period, and the total cleared area remains at 617.5 ha. The approved clearing footprint is 4,213.3 ha. - All clearing was previously authorised and controlled under Land Access and Disturbance Permits (LADP) to monitor and minimise the extent of land clearing. - The LADP System was replaced with the WAN GLUP system when the project entered temporary suspension. - There were no GLUPs authorising clearing during the reporting period. - All clearing records are maintained within BHPs spatial databases. - Exclusion zones around priority species and P1 species proximate to work areas are demarcated in the field by blue/white star picket markers. - The latest MRF report was submitted to DEMIRS in July 2025. - This document forms part of the fourth CAR that is due on 20 July 2026.
Management Objective: Minimise project-related indirect impacts to priority flora species Key Impacts and Risks: Loss of, or degradation of, vegetation condition due to project-related indirect impacts from altered fire regimes					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Develop and maintain a Fire Mitigation Plan and incorporate into the Asset Emergency Management Plan - Install and maintain fire extinguishers and firefighting equipment in the project area and on site to relevant Australian Standards - Install and maintain firefighting equipment in machinery and vehicles undertaking land disturbance activities - Project emergency response personnel trained in fire and bushfire response - Vehicles kept to access tracks or cleared areas - Develop and implement a Hot Work Permit system - Fire management practices developed in consultation with WA Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council, including installation and maintenance of firebreaks if required - Site induction to include information on prevention, management and response to fires	- No unplanned fires attributable to project-related activities - To minimise the potential environmental damage from project-related extreme or out-of- control wildfires	- Quarterly emergency response equipment inspections relative to relevant Australian Standards - Annual fire response training exercise including wildlife response - Annual review of fire break development for evidence of adequate installation and maintenance	- Internal incident reports - Internal project-related Land Access and Disturbance Register and LADPs - Hot Work Permit register - Induction and training records - Annual WMP Compliance Assessment Report	C	- The Bushfire Management Plan (WM-0000-WHS-PLN-0009) was issued for use on 18 October 2024. - Quarterly fire appliance audits are conducted to ensure compliance with the commitments in this plan. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system, as required. - When construction was under way, all fire-fighting equipment was audited quarterly by the relevant contracting partner. Before and during temporary suspension, Mercury Fire is responsible for the quarterly audit and maintenance of BHP-owned firefighting equipment. - All vehicles and mobile plant are equipped with firefighting equipment that is checked daily as part of the pre-start inspection. - All emergency response personnel are trained in fire response and training is conducted weekly. - Site rules prohibit departure from defined access tracks during operations. Departure during Project development was conducted only as required and were monitored by inspections and LADP system reporting. No clearing has been done since going into temporary suspension. - All hot works outside designated workshop areas are subject to first obtaining a hot works permit. Before temporary suspension, records of hot work permits were maintained by the various contracting partners. Compliance with the hot work permit system was subject to regular WHS workplace inspections and audits. BHP did not perform hot work during construction. - No hot work has been performed outside workshop areas since entering temporary suspension. When required, such work will be performed under a hot work permit. - During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable. - A memorandum of understanding for Mutual Support in Planning and

					Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022 but was cancelled on 21 October 2024 as a result of the capability reduction of the Project with the commencement of temporary suspension. • Firebreaks have been established around the perimeter of the accommodation camp, fixed plant, work areas and Aerodrome facility. Maintenance procedures include the maintenance of fire breaks.
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Management Objective: Minimise project-related indirect impacts to priority flora species					
Key Impacts and Risks: Loss of, or degradation of, vegetation condition due to project-related indirect impacts from increased abundance and or diversity of weeds					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Vehicle hygiene procedure implemented for vehicles and equipment coming on to, or returning to, the site for earthmoving - Weed control implemented on all project-related areas of disturbance - Develop and implement a Weed Control Management Plan to manage known weed infestations and control spread	- No vehicles or equipment brought to site without being cleaned of soil and vegetative matter - No new Declared pest species listed under Section 22 of the <i>Biosecurity and Agriculture Management Act, 2007</i> (WA), Weeds of National Significance (see https://weeds.org.au/) and weeds listed on DBCA's 'Goldfields Impact and Invasiveness Ratings List', become established within project-related disturbed areas - No increases to weed species' diversity or abundance due to project-related activities	- Quarterly review of vehicle and equipment hygiene inspection records - Annual review of site-wide weed inspection records in disturbance areas	- Incident reports - Weed register - Workplace inspection reports - Annual WMP Compliance Assessment Report which will include: - Details of any new weeds identified - Details on the success of control actions	C	- In accordance with the Weed Management Procedure, weed hygiene practices have been implemented that requires cleaning of all vehicles and mobile plant before coming to site, details of which are recorded in the Weed Hygiene form. When arriving on site, all vehicles and mobile plant are inspected again to confirm adequate weed hygiene. If suspected weed or seed material is detected, the material must be manually removed and presented for reinspection before being permitted to move around the WMP site. - For equipment and mobile plant bought in from other states, appropriate DPIRD biosecurity clearance information is required before the vehicle/mobile plant is permitted on site. Weed hygiene inspection records are maintained in the BHP document management system and an inspection sticker is affixed to each vehicle for monitoring and auditing purposes. - A weed control program was rolled out commencing in Q1 2024 to align with the flowering period and optimal chemical treatment window. - A weed control program was rolled out in Q1 2024 to align with the flowering period and optimal chemical treatment window. Weed control interventions during the reporting period consisted of the chemical treatment and physical removal of Paddy melon (<i>Citrullus colocynthis</i>), treatment of internal roads and drains and freshly disturbed areas to minimize colonization of existing weeds in March 2024. - Herbicide application was again done in March 2025. From March 2026, a biannual herbicide application program (March, September, has been adopted, especially to improve the efficacy of buffel grass control. - A quarterly review of vehicle and equipment hygiene inspection records is conducted by the Environmental Department and did not find a material increase in weed hygiene issues in the period leading up to temporary suspension. Since temporary suspension minimal inspections were required as the vehicle fleet was drastically decreased and has since remained constant. - Weed management related event reports are logged and actioned in the BHP event management system. None occurred during the reporting period.

Weed Monitoring Audit Table

Phase	Location	Frequency	Survey Method	Compliance Status	Evidence
Prior to Construction	Main Development Area and along infrastructure corridors (Northern Access Road and Northern Borefield). Main focus of baseline will include drainage lines, areas where water accumulates, roadsides	One-off (March to June)	Targeted Weed Survey Monitoring will include: - Date and time of monitoring - Weed species observed at specific locations within the Development Envelope (a visual guide will be available for identification of previously recorded Declared and introduced species). GPS location of any species not previously identified and not present within the visual guide - Estimate number of plants at each location - Reproductive status of weed if possible (e.g. flowering, non-flowering, seed set, seeding, condition) Results of baseline targeted weed survey will be used to determine appropriate quadrats for ongoing monitoring activities	C	- A baseline weed survey was conducted prior to construction commencement (October 2022), which found that weeds were largely located on pre-disturbed areas (roads, access tracks, accommodation village) Two weed species were encountered during the field assessment. These included 266 locations with an estimated 4,661 records of <i>Cenchrus ciliaris</i> (Buffel Grass), and one location represented by 1 plant of <i>Tribulus terrestris</i> (Caltrop). Eradication of buffelgrass is considered not feasible due to its widespread occurrence in the wider region. - Given the absence of weeds detected in previously undisturbed areas, no weed control measures were undertaken within undisturbed areas prior to the commencement of site development works. - Western Botanical completed a further baseline weed surveys in May 2023, in accordance with the commitments of the FVMP. In addition to Buffel grass and Caltrop, the following weed species are present on site: <i>Citrullus colocynthis</i> – Paddymelon <i>Rumex vesicarius</i> – Ruby Dock <i>Hypochaeris radicata</i> – Flat Weed / Hairy Cats Ear <i>Malvastrum Americanum</i> – Spiked Mallow <i>Erodium aureum</i> – Golden Herons-bill / Stroks Bill / Pinweed / Redstem <i>Chloris virgata</i> – Feathertop Rhodes Grass <i>Brassica tournefortii</i> – Mediterranean Wild Turnip - A weed control program was rolled out in Q1 2024 to align with the flowering period and optimal chemical treatment window. Weed control interventions during the reporting period consisted of the chemical treatment and physical removal of Paddy melon (<i>Citrullus colocynthis</i>), treatment of internal roads and drains and freshly disturbed areas to minimize colonisation of existing weeds in March 2024. - Herbicide application was again done in March 2025. From March 2026, a biannual herbicide application program (March, September), has been adopted, especially to improve the efficacy of buffel grass control.
Construction and Operation	Sites to be selected as an output of No.1, nominally, these locations may include: - Reference site between Mantamaru and Papulankutja communities - Along Northern Access Road - WMP camp and spray field area - Adjacent WMP processing plant - WMP WRDs - Northern Borefield alignment	Annually (March to June, preferably within 6 to 8 weeks of rainfall)	Targeted annual surveys of high-risk areas as identified as an output of No.1. The survey will include assessment of at least six permanent 50 m x 50 m quadrats (marked with metal stakes and flagging tape) which will be established at each of the locations as identified in the Targeted Weed Survey detailed above (No. 1). The following details will be collected at each location: - Date and time of monitoring - Weed species observed at specific locations within the Development Envelope (a visual guide will be available for identification of previously recorded Declared and introduced species). GPS location of any species not previously identified and not present within the visual guide - Estimate number of plants at each location - Reproductive status of weed if possible (e.g. flowering, non-flowering, seed set, seeding, condition) - Observations relevant to the presence of the new species (i.e. proximity to roads, water sources) - Any control actions taken (i.e. manual removal, spraying etc.)	C	- Western Botanical has been engaged to conduct annual weed surveys in compliance with the survey requirements. The reports for the survey conducted in August 2025 is maintained in the BHP document management system. The survey was delayed due to logistical issues. - The draft Weed Management Plan identified that the ongoing weed monitoring program will focus on the six weed species highlighted for management and listed below: <i>Aerva javanica</i> (perennial) <i>Cenchrus ciliaris</i> (perennial) <i>Citrullus colocynthis</i> (annual) <i>Hypochaeris radicata</i> (annual) <i>Rumex vesicarius</i> (annual), and <i>Tribulus terrestris</i> (annual) - The Weed Management Plan (WM-0000-ENV-PLN-0019) was amended in September 2024 to also include <i>Hypochaeris radicata</i> - Flat Weed and <i>Aerva javanica</i> – Kapok. - The Weed Management Plan describes the proposed monitoring of thirteen permanent 50m x 50m quadrats, which have been established across a number of <i>Cenchrus ciliaris</i> (Buffel Grass) populations of varying density, to measure percentage foliar cover of weeds. These quadrats are

					spatially distributed across the site to provide sample sites that can be used to provide ground calibration for the weed density imagery. At each quadrat the following parameters are recorded during each survey: - o Date and time of monitoring, recorder, vegetation association. - o Weed species observed, seasonal conditions. - o GPS location. - o Number and maturity of plants (seedlings, juvenile, adults). - o Percentage foliar cover (PFC) of each weed species. - o Health (condition rating) of population and reproductive status (vegetative, flowering, seed set); and - o Standard photographs from marked locations.
Construction and Operation	Main Development Area and along infrastructure corridors (Northern Access Road and Northern Borefield). Main focus of baseline will include drainage lines, areas where water accumulates, roadsides	Every five years (March to June, preferably within 6 to 8 weeks of rainfall)	Targeted Weed Surveys as detailed in No 1.	NR	Not yet applicable.

A4. APPENDIX 4 – AUDIT FINDINGS FOR GMMP IMPLEMENTATION

FVMP Reference	Element	Requirements	Compliance Status	Evidence
2.6.1	Reporting to Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in this section will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring. The Ngaanyatjarra Council will be made aware of any trigger or threshold exceedances within 48 hours of BHP becoming aware of them.	C	Under the requirements of Groundwater Licence GWL207745, EMM Consulting prepared the Annual Groundwater Monitoring Report, for the period 1 January 2025 to 31 December 2025. The report was submitted to DWER on 30 March 2026, as per the requirements of the Licence. The Ngaanyatjarra Council (NgC) was notified of the submission of the report on 9 April 2025. The ongoing exceedance of sulphate and electrical conductivity (EC) threshold levels at bores BMB-10D and BMB-10S (now renamed NWMGW-BMB-10D and BMBWM-BMB-10S) was first reported to the NgC on 6 August 2024. It was explained that these exceedances reflect the natural baseline and are not a result of mining activities or groundwater abstraction. Due to the ongoing nature of the exceedances, they were not specifically reported to the NgC again as the issue continues to be discussed at periodic environmental and approvals meetings. The review of water quality data undertaken as part of the 2025 Annual Groundwater Monitoring Summary Report, and subsequent field analyses and laboratory results (March 2026), found that: - pH across all monitoring bores fluctuates within a tight range and indicate no clear trend during the monitoring period. The majority of bores remain slightly alkaline to neutral. Minor decreases in pH in MMB-02 during March and April 2026 were reflected in the field data and the March laboratory results and are associated with the presence of termite colonies down-hole (and an associated smell of oxalic acid). - The electrical conductivity (EC) at all the monitoring bores showed a stable trend. The EC values for the Garford formation typically range from 800 to 1,200 µS/cm. Qualities in the Pidinga formation typically range from 1,500 to 2,000 µS/cm, except for WMPW01 and NWMGW-BMB-10D that typically range around 3,200 µS/cm. - Elevated concentrations of various metals were observed in bores across the monitoring network. These elevated concentrations are naturally occurring and more than likely associated with the local geological formation. No project related activities are associated with these. The total volume of water abstracted for the reporting period is 13,989kL (only 0.19% of the annual 7.5GL/year groundwater allocation, and a further reduction on the 2.05% of allocation used during the previous reporting period). This scale of use will likely continue until a decision is made regarding recommencement of construction activities.
2.6.3	Annual and Triannual Aquifer Review	BHP will prepare annual and triennial (every three years) groundwater monitoring and management reports for submission to DWER (Swan-Avon Region). The annual and triennial groundwater monitoring and management reports will comply with Operational Policy No. 5.12 – <i>Hydrogeological reporting associated with a groundwater well licence</i> (DoW, 2009). The reports will include an assessment of compliance with the GMMP and may include recommendations for changes to the water management system to maintain compliance with the GMMP.	C	EMM Consulting prepared the Annual Groundwater Monitoring Report, for the period 1 January 2025 to 31 December 2025. The report was submitted to DWER on 30 March 2026, as per the requirements of the Licence. EMM Consulting prepared the Triennial Groundwater Monitoring Review, for the period 1 January 2022 to 31 December 2024. The report was submitted to DWER on

				31 March 2025, as per the requirements of Groundwater Licence GWL207745. Both reports recommended that: - the Groundwater Operating Strategy (GWOS) and the GMMP be revised following construction to reflect installed versus proposed monitoring infrastructure, and to remove any bores superfluous to requirements - the GWOS and GMMP be revised to scale down monitoring during the temporary suspension period to reflect significantly reduced groundwater abstraction (currently less than 1% of the allocated 7.5GL/year).
2.6.4	Reporting of Potential Non-Compliance	In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, BHP will report in accordance with the requirements of the relevant Ministerial Statement Condition(s).	NC	The ongoing exceedance of sulfate and electrical conductivity (EC) threshold levels at bores BMB-10D and BMB-10S (now renamed NWMGW-BMB-10D and BMBWM-BMB-10S) was reported to DWER as a non-conformance in 2024 and 2025. These exceedances relate to natural baseline water quality and are not impact related. Discussions with the EPA and DWER regarding the amendments to GMMP and GWOS that address these “exceedances” are ongoing and have been reflected in the revised documents that have been prepared. Until approval of an amended GMMP and GWOS, this will continue to be reported as a non-compliance in the CAR.
3.1	Management Plan Review	This GMMP will nominally be reviewed at least every three years from the date of endorsement to ensure that it reflects the then-current situation with regards to groundwater monitoring and management. This GMMP may also be reviewed should any of the following occur: - As and when directed by the CEO, including (if directed) in consultation with the Ngaanyatjarra Council, as per Condition 4-6(2) of the Ministerial Statement 1188 (20 April 2022). - The addition or change of infrastructure within the project that has the potential to significantly change the predicted direct or indirect impacts related to groundwater, that was not approved as a part of the project and would require regulatory approval (e.g. the construction of an additional TSF or WRD, the addition of new dewatering or borefield infrastructure). - Any change in operational practices on site that has the potential to significantly change the predicted direct or indirect impacts related to groundwater, and that was not approved as a part of the project and would require regulatory approval (e.g. an increase in abstraction rate, a change in the construction or operational methodologies associated with the TSF or WRD). - A change in understanding, status, nature or scale of potential GDEs and/or beneficial users related to this GMMP (e.g. the addition of new third-party groundwater users, identification of additional plant species dependent on groundwater and/or a further understanding of the EWRs and EWPs (WRC, 2000) related to existing identified GDEs). Any changes to this GMMP may require approval from EPA and may involve consultation with relevant stakeholders.	C	A Care and Maintenance groundwater monitoring program of work has been developed for the Project suspension period, with monitoring adjusted to reflect the significantly lower water demand, the fact that abstraction bores have yet to be installed for water supply from the Northern Borefield, and the reduced risk of impacts. The GMMP is being reviewed and a revised GMMP and a revised document will be submitted for approval in due course.

Groundwater Monitoring and Management Plan Audit Table

Terrestrial Groundwater Dependant Ecosystem Uncertainty Studies EMP Audit Table - Table 8

Objective: To maintain the hydrological regimes and quality of groundwater...so that environmental values are protected Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater Key Impacts and Risks: - Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to: - Groundwater drawdown associated with groundwater supply development and mine dewatering - Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater					
Uncertainty	Management Actions	Monitoring	Timings	Compliance Status	Evidence
Uncertainty 1: The hydrogeological numerical model has been informed by data collected from 20 groundwater test bores, a program of geological drilling and geophysical methods. Uncertainty is inherent in most hydrogeological models and will be further refined as part of ongoing geophysical test work, model refinements, and through the adaptive management of the borefield during the project operations, in particular assessing borefield predictions against hydrographs to confirm that the borefield is behaving as predicted.	Monitor rates of drawdown from bores located near to abstraction sites (inside of borefield and mine area groundwater contours) against end of operations hydrographs to confirm that predicted water table drawdown is not significantly different than predicted. Note: where rates of drawdown across the monitoring network are significantly different to those modelled across hydrographs a revision of the hydrogeology model will be triggered to confirm any potential deviation in groundwater contours against existing predictions (as presented herein).	- Water levels at mine monitoring bores MMB-05 to MMB-08 using transducer, dipping or similar. - Water levels at borefield monitoring bores BMB-06a to BMB-09a and BMB-06b to BMB- 09b using transducer, dipping or similar.	- Monthly monitoring of water levels for the first two years of operation or until stabilisation has been reached and the drawdown contours are behaving consistently with hydrographs. - Review against hydrographs to occur quarterly. - Conformation of whether hydrogeology model updates are needed will occur following the collection of 12 months of data.	C	Prior to it transitioning to temporary suspension, the Project was still in its construction phase, and both the Northern Borefield and mine dewatering bores are yet to be established. As a result, the monitoring infrastructure and management actions are not yet relevant and further refinement of the model is not appropriate at this stage. Subject to the recommencement of construction and operation at the Project, BHP remain committed to a program of monitoring that can be used to refine and update the hydrogeological model over the life of mine period.
Uncertainty 2: While flora and vegetation surveys have been undertaken in much of the area encompassing the predicted 2 m drawdown contour, some areas remain unsurveyed largely due to cultural heritage access restrictions. As a result, there may be some additional areas of potential terrestrial GDEs that remain unsurveyed within the predicted drawdown contours.	- Map and report previously unmapped potential terrestrial GDE associations within the 2 m water table drawdown contours, the 0.5 m water table drawdown contours in proximity to natural resource priority areas in the vicinity of Cavanaugh Range/Linton Bore and in any other priority areas as agreed between the Ngaanyatjarra Council and BHP, (this may require reliance on the use of high- resolution imagery). - The Ngaanyatjarra Ranger Team will be invited to participate in any on ground flora and vegetation survey activities (subject to fair and reasonable commercial terms)	Vegetation mapping using high- resolution aerial imagery, and where necessary, and where access allows, ground truthing using the establishment of vegetation survey quadrats.	Prior to the commencement of mine dewatering and borefield abstraction.	C	Since the project has entered temporary suspension further progress has not been made with the planned remote sensing study of GDE's in areas that are inaccessible due to cultural restrictions. Should the project proceed, planning for the performance of these studies is still as reported in the 2024 CAR, i.e.: <i>A GDE ecohydrology assessment was undertaken by AQ2 to expand on previous groundwater dependent vegetation assessment work conducted by AQ2 and CDM Smith.</i> <i>The AQ2 report of November 2023 presented a conceptual ecohydrological model for the Project area vegetation, with a focus on the most likely groundwater using species <i>Corymbia opaca</i>. The study consisted of an additional ecohydrological spatial data analysis (desktop assessment) involving a more extensive and finer resolution dataset than previously used, alternate remote sensing indices and the results of updated numerical groundwater modelling.</i> <i>The report provided additional information around the status of vegetation types identified as potential GDEs and includes information on vegetation health, as observed during a field investigation. The report makes recommendations for possible future work to further validate the conceptual ecohydrological model.</i> <i>The assessment concluded that it is highly likely vegetation in the Project area does not have a connection with groundwater, owing to the presence of massive silcrete above the water table that is impenetrable to plant roots. It also provides hypotheses for the occurrence of <i>Corymbia opaca</i> despite the silcrete barrier.</i> <i>The report was peer reviewed on behalf of the NgC in March 2024. As a result of the peer review and subsequent consultation with the NgC, it was agreed that additional remote sensing work, focusing specifically on the potential for impacts on Desert Oaks (<i>Allocasuarina decaisneana</i>) would be conducted. The major constraint on such a study is that access to areas where Desert Oaks occur is outside of the Development Envelope and restricted due to cultural sensitivities.</i> <i>An independent peer review conducted by Dr Richard</i>

					Cresswell of EcoLogical, queried some of the findings and limitations described in the AQ2 report, the responses to which are currently being reviewed and prepared. BHP has obtained a proposal from Stantec (April 2024) to compile a monitoring process for Desert Oak utilising remote sensing, together with on-ground assessment that is to be undertaken by Traditional Owners. The monitoring procedure allows for both qualitative and quantitative assessment of the condition of Desert Oaks to understand trends over time. It proposes to use multi-spectral satellite images to deduce the condition of Desert Oak individuals and populations and derive the historical condition of populations and individuals.
Uncertainty 3: The terrestrial GDE assessment has relied on literature, remote- sensing imagery, and professional judgement to identify vegetation associations/mosaics that may represent terrestrial GDEs that could be impacted by the project. Field studies (e.g. measurements of leaf water potentials, etc) could supplement this data to further reduce uncertainty.	- Undertake field-based terrestrial GDE assessments to identify the degree of groundwater dependence (if any) of key plant species within vegetation associations and mosaics identified as possible terrestrial GDEs to determine environmental water requirements. - Field-based terrestrial GDE assessments of a stand of Desert Oaks (<i>Allocasuarina decaisneana</i>) known as Exclusion Zone 2, 7.6 km from the main development area (outside all known drawdown contours). - Invite the Ngaanyatjarra Council (and their associated specialists) to be involved in the scoping of terrestrial GDE assessments. - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based terrestrial GDE survey activities (subject to fair and reasonable commercial terms)	Conduct the following analysis on a minimum of 10 potential terrestrial GDE trees (or as otherwise agreed with EPA or an appropriately qualified ecohydrology specialist) within each identified potential terrestrial GDE: - Leaf water potential (LWP) measurements - Stand/stem basal area calculation - Measure isotopic composition of groundwater, soil water and plant (xylem) water	Prior to the commencement of mine dewatering and borefield abstraction.	C	Since the project has entered temporary suspension further progress has not been made with the in-field collection of data on desert oaks by Traditional Owners in support of the proposed GDE Studies. Should the project proceed, planning for the performance of these studies is still as reported in the 2024 CAR, i.e.: <i>Field-based terrestrial GDE assessment were conducted as part of the AQ2 Study (November 2023) and were utilised to provide further clarity around the status of vegetation types identified as potential GDEs.</i> <i>A field-based assessment of a stand of Desert Oaks (Allocasuarina decaisneana) known as Exclusion Zone 2, 7.6 km from the main development area could not be conducted as part of the AQ2 assessment, or prior assessments, due to being located outside of the Development Envelope and the Mining Agreement area, where Project Operations are not permitted to occur as per the relevant clauses of the Mining Agreement. The Desert Oaks are associated with areas of cultural sensitivity, which also limits access by BHP personnel or consultants to undertake in-field monitoring.</i> <i>Under the Stantec proposal to develop a GDE monitoring procedure, Traditional Owners will be involved in the in-field collection of data associated with the Desert Oaks. Data and measurements utilised by AQ2 to support the conclusion that plants use water from the unsaturated zone includes:</i> <i>The shallow depth of the silcrete/calcrete</i> <i>The low tree densities, indicating that trees are associated with localised deeper pockets of soil on the calcrete plains that receive localised runoff.</i> <i>Negative pre-dawn leaf water potential</i> <i>As per the summary presented in the EMM independent review letter, dated June 2024 an updated ecohydrogeology study has been completed (AQ2 2023) that suggests previously identified potentially groundwater dependent vegetation are unlikely to use/rely on groundwater (are likely to be wholly met by soil moisture replenished by rainfall), however BHP is continuing to consider whether additional investigations are required to fully address this uncertainty.</i>

Objective: To maintain the hydrological regimes and quality of groundwater...so that environmental values are protected Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater Key Impacts and Risks: - Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to: - Groundwater drawdown associated with groundwater supply development and mine dewatering - Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater					
Uncertainty	Management Actions	Monitoring	Timings	Compliance Status	Evidence
Uncertainty 4: Further studies, coupled with ongoing monitoring, is required to better understand the tolerance of terrestrial GDEs to water table drawdown, and thereby inform the (Environmental Water Provision) EWP required to sustain ecosystem function. This work would support the setting of site-specific criteria for EWPs. Note: ongoing assessment of EWP would only be required should the baseline assessment (detailed in Uncertainty 3) confirm that identified potential terrestrial GDE associations, are groundwater dependent.	- Assess environmental water requirements of potential terrestrial GDEs and quantify suitable EWPs for all identified terrestrial GDEs identified within the impacted area (i.e. within the 2 m drawdown contour). - Based on these studies refine water table drawdown and groundwater quality EWP that are considered protective of ecosystem health and update trigger criteria, threshold criteria and management within this GMMP as required. The Ngaanyatjarra Council will be invited to comment on the establishment of site-specific criteria for GDE EWPs - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based terrestrial GDE survey activities (subject to fair and reasonable commercial terms)	Undertake ongoing seasonal monitoring, for a period adequate to reduce uncertainty, comprising: - LWP - Water table depth (continuous data collection using a transducer or similar)	Ongoing seasonal monitoring to be undertaken quarterly following the commencement of mine dewatering and borefield abstraction.	NR	As the detailed baseline assessment (Uncertainty 3) confirming potential GDE associations has not been completed and both the Northern Borefield and mine dewatering bores are yet to be established, seasonal monitoring is not required at present. Subject to the recommencement of construction and operation at the Project, BHP remain committed to a program of monitoring that can be used to better understand the tolerance of terrestrial GDEs to water table drawdown and thereby inform the Environmental Water Provision (EWP).

Outcomes Based EMP for Groundwater - Table 12

Key Environmental Values: Ecosystem health of potential groundwater dependent terrestrial vegetation and beneficial use of groundwater Key Impacts and Risks: - Change to groundwater quality and quantity adversely impacts beneficial use and ecosystem health. The changes may arise due to: - Groundwater drawdown associated with groundwater supply development and mine dewatering - Evaporative losses of groundwater from final pit voids, and interaction between pit void(s) and groundwater - Seepage from mine waste landforms (TSF and WRDs) - Release of water or hazardous materials from potential contaminant sources (including WRDs, TSF, hazardous goods storage areas and equipment)						
Outcome	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
Outcome 1: Groundwater management infrastructure operates as per design to minimise adverse impacts to environmental values	Trigger Criteria: 68% of the predicted drawdown at 2 m water table drawdown contour, and/or a reference site near Jameson over two consecutive monitoring events - Monitoring bores within drawdown contours (inside of borefield and mine area groundwater contours) against end of operations hydrographs to confirm that predicted water table drawdown is not significantly different than predicted. Note: where rates of drawdown across the monitoring network are significantly different to those modelled in hydrographs a review or revision of the hydrogeology model will be triggered to confirm any potential deviation in groundwater contours against existing predictions (as presented herein).	Indicator: Groundwater levels Method: Field collection or automation of groundwater level using a transducer or manual dipping. EC and pH would also be collected. Location (Figure 6): - Monitoring bores at the 2 m water table drawdown contour: - Mine: MMB-01 to MMB-04 - Northern Borefield: BMB-01 to BMB-04 and BMB-06a) - Near Jameson: CMB-01 - Control sites: CMB-01 to CMB-04 - Monitoring Bores within the drawdown contours used to confirm accuracy of drawdown predictions: - Mine: MMB-05 to MMB-08 - Borefield: BMB-06a to BMB-09a and BMB-06b to BMB-09b - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms)	Monthly data collection, A review of this frequency will occur on an annual basis Quarterly review of drawdown against hydrographs Determination of whether hydrogeology model update is required will occur at the end of 12 months of data collection.	- Annual compliance assessment report (if the Plan is conditioned under the EP Act) (DWER – Compliance Branch) - Annual Aquifer Assessment Report (DWER – Swan-Avon Region) - Triennial (every three years) Aquifer Review (DWER – Swan Avon Region)	C	Prior to temporary suspension, the Project was still in its construction phase and both mine dewatering bores and the Northern Borefield had yet to be installed. As a result, no major abstraction has occurred. Five active bores in the mining area are utilised for potable water supply. The abstraction volume during the reporting period was 0.19% of the 7.5GL/a allocation. The 2025 Annual Groundwater Monitoring (EMM 2026) and the Triennial Groundwater Monitoring Review (EMM, 2025) both indicate that no project related drawdown has occurred to date and that Outcome 1 is met. Minimal abstraction will continue until a decision to recommence construction is made. This level of abstraction is of minimal to no risk to receptors. Trigger and threshold criteria are not at risk of being breached.
	Threshold Criteria: Equal to the predicted drawdown at 2 m water table drawdown contour and/or a reference site near Jameson at any single monitoring event; and subsequent investigations determine that the impacts are likely a result of the implementation of the proposal					
Outcome 2: Groundwater management infrastructure will be managed to ensure	Trigger Criteria: 68% of the predicted 1 m drawdown at a monitoring bore adjacent to Linton Bore over two consecutive monitoring events (in comparison to a reference bore). - And/or rate of drawdown at Linton Bore is greater than	- Indicator: Groundwater levels and hydrograph - Method: Field collection or automation of groundwater level using a transducer or manual dipping. EC and pH would also be collected. - Location (Figure 6):	Monthly data collection A review of this frequency will occur on an annual basis Quarterly review of drawdown against hydrographs		NR	Same as evidence for Outcome 1. The monitoring bore at Linton Bore has not yet been installed during the construction phase. It will be installed if/when construction re-commences. Outcome 2 is met.

groundwater table drawdown is no greater than 1 m south of Linton Bore (towards the Cavanaugh Range)	0.1 m/year (over and above natural variation) over a 12-month period.	- Monitoring bores near Linton Bore (BMB-00) - Control sites: CMB-01 to CMB-04 - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms)				
	Threshold Criteria: - Equal to the predicted 1 m water table drawdown at a monitoring bore adjacent to Linton Bore at any single monitoring event (in comparison to a reference bore); and subsequent investigations determine that the impacts are likely a result of the implementation of the proposal - And/or rate of drawdown at a site adjacent to Linton Bore is greater than 0.2 m/year (over and above natural variation) over a 12-month period.					

Uncertainty	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
Outcome 3: No adverse impacts to groundwater quality outside of assessed impact areas as a result of implementing the proposal	Trigger Criteria: An exceedance of groundwater quality guideline values (see Table 9) in comparison to reference sites over two consecutive monitoring events	- Indicator: Hydrochemistry concentrations - Method: Field sample collection and laboratory analysis - Location (Figure 6): - Selected reference sites as 'threshold locations' downstream of key project infrastructure (TSF, WRD and processing plant) - Selected reference sites as 'control locations' upstream from key project infrastructure - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms)	Quarterly		C	No significant trends in water quality (pH, EC, hydrochemistry) were observed that may be of concern to GDEs, other receptors, or water resources. This is an expected result given the extremely low level of abstraction and the minimal activity on site during temporary suspension. Some water quality monitoring results (for EC and sulphate) were consistently above defined trigger/threshold levels despite there being limited site water abstraction activities occurring. This indicates that there likely higher background levels of these parameters and that further work needs to be done to refine management criteria levels. Outcome 3 is met.
	Threshold Criteria: An exceedance of site-specific background threshold criteria in any single monitoring event in comparison to reference sites; and subsequent investigations determine that the impacts are likely a result of the implementation of the proposal					
Outcome 4: No adverse impact to confirmed terrestrial GDEs outside of the 2 m water table drawdown contour Note: This outcome would only be relevant should the baseline potential terrestrial GDE program confirm the presence of GDEs, and if confirmed, this outcome would only occur should the trigger criteria for Outcome 1 be triggered	Trigger Criteria: A statistically significant difference in primary parameter (Appendix B) trends at sites of confirmed terrestrial GDEs between the 2 m and 0.5 m water table drawdown contours compared to baseline monitoring values over two consecutive monitoring events	- Indicator: Vegetation health and condition (Appendix B) - Method: Visual assessment of vegetation health (photos and visual assessment), collection of leaf water potential data, and/or more regional methods such as NDVI or LiDAR to evaluate tree heights. - Location (Figure 6): - At locations of confirmed terrestrial GDEs between the 2 m and 0.5 m water table contours (TBA based on uncertainty surveys detailed in Table 8) - Control sites away from key project infrastructure, and their potential impacts (if available) - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based water monitoring activities (subject to fair and reasonable commercial terms)	In the event that groundwater trigger criteria detailed in Outcome 1 or Outcome 2 are triggered, visual assessments and collection of leaf water potential would occur quarterly	- Annual compliance assessment report (if the Plan is conditioned under the EP Act) (DWER – Compliance Branch) - Exceedance reporting (on trigger and threshold criteria) (DWER – Compliance Branch) - Reporting on contingencies	NR	The AQ2 eco-hydrogeological report (2023) suggests that there are no confirmed Groundwater Dependent Ecosystems within the Development Envelope, so no vegetation health monitoring has been undertaken within this area. Similarly, the level of abstraction is so low that, consistent with Outcomes 1 and 2, monitoring has demonstrated that no project related drawdown has occurred to date. This trend is expected to continue. Outcome 4 is met.
	Threshold Criteria: A statistically significant difference in primary parameter (Appendix B) trends at sites of confirmed terrestrial GDEs between the 2 m and 0.5 m water table drawdown contours compared to reference sites over four consecutive monitoring events; and subsequent investigation determine that the impacts are likely a result of the implementation of the proposal					

Uncertainty	Criteria	Monitor	Frequency	Reporting	Compliance Status	Evidence
Outcome 5: No adverse impact to vegetation within the Desert Oak Heritage Exclusion Zone	Trigger Criteria: A statistically significant difference in vegetation health and condition at designated monitoring sites within exclusion zone 2 (Appendix B) compared to baseline monitoring values over two consecutive monitoring events Threshold Criteria: A statistically significant difference in vegetation health and condition at designated monitoring sites within the exclusion zone 2 (Appendix B) compared to baseline monitoring values over four consecutive monitoring events and subsequent investigation determine that the impacts are likely a result of the implementation of the proposal	Indicator: Vegetation health and condition Method: Visual assessment of vegetation health (photos and visual assessment). Location (Exclusion Zone 2) - The Ngaanyatjarra Ranger Team will be invited to participate in any field-based vegetation health monitoring activities (subject to fair and reasonable commercial terms)	Annual	- Annual compliance assessment report (if the Plan is conditioned under the EP Act) (DWER – Compliance Branch) - Exceedance reporting (on trigger and threshold criteria) (DWER – Compliance Branch)	C	Work required to confirm potential impacts within the Desert Oak Heritage exclusion zone has not been finalised due to temporary suspension of the project development. Such work, consisting of a combination of remote sensing and in-field surveys by Ngaanyatjarra Rangers, will re-commence should the project proceed. The level of current abstraction means that risks to Desert Oaks in the meantime are low to non-existent.

A5. APPENDIX 5 – AUDIT FINDINGS FOR TFMP IMPLEMENTATION

Terrestrial Fauna Management Plan Audit Table

TFMP Reference	Element	Requirements	Compliance Status	Evidence
1.4.3	Management Approach Table 12: Minimisation Measures for Direct Impacts to Significant Fauna	A considerable effort was made as part of the S38 application to reorient and reduce the size of Development Envelope to avoid impacts to environmental values. This included a reduction of the Development Envelope from 25,200 ha to 21,679 ha (13.3% reduction), and of the disturbance footprint from 3,961 ha to 3,830 ha resulting in the exclusion of some areas known to support significant fauna (such as the formally proposed Western Access Road and parts of the Southern Monitoring Area where deep sand spinifex occurs). Under Attachment 1 to MS1188 (s45 C amendment) the clearing footprint has been increased from 3,830 ha to 4,213.3 ha.	C	- A total of 617.5 ha of the 4,213.3-ha approved under MS1188 have been cleared to date. - No clearing was undertaken during the reporting period. - Evidence of cleared areas are maintained in the WAN's spatial databases.
		Adjustment of the Development Envelope to exclude habitat known to support significant species (excluded 82 % of Spinifex Sandplain habitat)	C	Measures to avoid impacts to Sandplain Spinifex habitat were implemented during project design and, where required, footprints were redesigned to avoid active skink burrows. No Spinifex Sandplain habitat was cleared during the reporting period.
		Avoidance through informed design by minimising clearing to the smallest area possible and placing waste in-pit where practicable	C	- Measures to avoid impacts on significant species habitat were implemented during project design and, where required, footprints were redesigned to actively avoid such habitat. - No Significant species habitat clearing was undertaken during the reporting period. - No deposition of mining occurred during the reporting period.
		Avoidance or minimisation through informed design by avoiding clearing of habitat for conservation-significant species and, where practicable, micro-sighting infrastructure during construction to avoid significant habitats	C	Measures to avoid impacts on significant species habitat were implemented during project design and, where required, footprints were redesigned to avoid active such habitat. No clearing was performed during the reporting period, and micro-siting was not required.
		Siting of turbines outside of habitats known to support significant fauna species	NR	No turbines have been constructed to date.
		Consideration of the swept height of wind turbine blades above the vegetation canopy for wind farm design and development	NR	No turbines have been constructed to date.
		Exclusion of the use of barbed wire fencing to minimise impacts to bats and avian fauna	NR	There is no barbed wire on site.
		Development and implementation of a site-specific internal land and clearing/disturbance procedure and associated permit to prevent clearing outside approved boundaries, and to minimise disturbance to only that required	C	During the previous reporting period West Musgrave transitioned from the Oz Minerals (OZ) Land Access and Disturbance Procedure and associated Land Access and Disturbance Permits (LADP) to the WAN Global Land Use Permit (G-LUP) system. The G-LUP system in fully implemented all activities performed on site are covered under the conditions in relation to environment, land access and heritage imposed under relevant, approved G-LUPs. Where required, compliance Records are maintained within the G-LUP system.
		The site induction program would provide information on protection of significant fauna habitats and land access and disturbance authorisation procedures	C	The site induction is mandatory for all employees and contractors. It contains extensive information on the protection of fauna including priority and threatened fauna
		A pre-clearance survey would be undertaken in Spinifex Sandplain to ensure that proposed clearing is aligned away from signs of Great Desert Skink	C	No Spinifex Sandplain habitat was cleared during the reporting period.
		Implementation of a Feral Animal Monitoring and Control Program	C	A summer and winter feral fauna monitoring program utilising 24 camera traps was first implemented in December 2023 to January 2024. Subsequent surveys were conducted in June 2024, January 2025, June 2025 and January 2026 During the reporting period Quarterly Feral Fauna audits were completed in September 2025 and March 2026 to supplement the June 2025 and January 2026 camera trapping surveys. Records are maintained in the SharePoint system.

	Various aspects of the conceptual and detailed design of the wind farm and individual turbines would take into account the following design features to reduce the risk of avian fauna and bat mortalities:	NR	Turbine designs have not been selected yet.
	• Design of turbine towers with solid structure turbines, as opposed to lattice style structures to prevent birds, particularly raptors, using the turbines as perching and/or nesting locations, increasing the likelihood of rotor collision • Size of turbines would be as large as practicable to allow the turbines to be more visible to avian fauna species and have lower blade rotational speeds than smaller turbines • Turbines would be designed to create less edges where possible • Provision of visibility enhancement devices		
	Progressive rehabilitation would be undertaken on disturbed areas as they become available	C	No rehabilitation works were performed during the reporting period. Ad hoc monitoring of progress with the re-establishment of vegetation at the 7.59ha of drill pads and access tracks rehabilitated in the western solar farm area during the previous reporting period was undertaken. No soil erosion was observed, and pioneer species are establishing.
	Monitoring of analogue and rehabilitated areas would be undertaken to ensure short, medium and long-term rehabilitation objectives are achieved	C	Ad hoc monitoring of rehabilitation areas is undertaken to monitor for erosion, weed infestation and progress with the re-establishment of vegetation. The status of declared weeds is monitored annually by Western Botanical during an annual winter survey. .

FVMP Reference	Element	Requirements	Compliance Status	Evidence
		Ongoing development of monitoring methodology and rehabilitation techniques would occur during the life of the project. Further assessments over time would plot the development of rehabilitated areas against analogue sites and progression towards completion targets	NR	Project construction in temporary suspension.
		Preparation and regular update of a Mine Closure Plan consistent with DMIRS and EPA Guidelines for Preparing Mine Closure Plans (DMIRS, 2020)	C	Mine Closure Plan (MCP) Reg ID 103201 approved 11/08/2022 and most recently revised 18 January 2024. The first revision is due August 2027.
1.4.3	Management Approach Table 13: Minimisation Measures for Indirect Impacts to Significant Fauna	Firebreaks would be maintained around fixed plant areas	C	- Firebreak has been established around the perimeter of accommodation camp and is reflected in NgC Cultural Heritage Permit to Work on WMP Camp Firebreak issued 2022. - Specifications for the establishment and maintenance of firebreaks are contained in the Bushfire Management Plan. - Fixed plant under construction at time of audit. Adequate firebreaks are currently in place around fixed plant. - Fire Breaks are maintained as part of temporary suspension.
		Fire management infrastructure would be maintained on site and in vehicles, along with competent persons for the management of bushfires	C	- Daily vehicle and mobile plant pre-start inspection checks include checks of in-vehicle fire extinguishers. - All fire-fighting equipment is audited and repaired as required on a quarterly schedule by Mercury Fire. - Emergency Services Personnel (ESO) hold Cert 3 Mines rescue incorporating Firefighting and wild-fire competencies. ERT are trained in Fire Operations. - Mercury fire attend site and check WES fire system and Fire extinguishers as per register for in service date use. - Fire management and reporting by ESO's occurs every 3 months as per SAP work management orders any issues reported to site SSE.
		A Hot Works procedure would be put in place to ensure adequate controls are put in place for activities that have the potential to result in bushfire	C	- All hot works outside designated workshop areas are subject to first obtaining a hot works permit. Before temporary suspension, records of hot work permits were maintained by the various contracting partners. Compliance to the hot work permit system was subject to regular WHS workplace inspections and audits. BHP did not perform hot work during construction. - No hot work has been performed outside workshop areas since entering temporary suspension. When required, such work will be performed under a hot work permit. - During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable.
		Fire management protocols and land management would be consulted with the Ngaanyatjarra Council to ensure that aligned fire management outcomes are achieved	C	Land management using controlled burns has been discussed with NgC and is not supported at this time. The current approach is to ensure adequate firebreaks around protected assets through removal of vegetation via grading. Further consultation with the NgC is anticipated.
2.3.1	Reporting Ngaanyatjarra Council and Ngaanyatjarra People	All reporting discussed in Section 2.3 of the TFMP will be made specifically available to the Ngaanyatjarra People through the Ngaanyatjarra Council, including where necessary periodic face-to-face meetings to discuss the results and outcomes of monitoring.	C	- Statutory annual reports and fauna-related incident reports, including reports of culturally significant fauna deaths are made available to the NgC and the contents of reports are discussed during regular heritage and environment and approvals meetings, as well as during quarterly Heritage and Liaison committee meetings. Records of the provision of reports and the discussion of results are captured in the minutes of meetings that are maintained in the secure folders in SharePoint for confidentiality considerations. - No project attributable fauna deaths were recorded during the reporting period.
2.3.2	Annual Reporting	OZ Minerals will prepare Annual Environmental Reports (AERs) to be submitted to regulatory authorities.	C	During the reporting period and AER was submitted to DEMIRS in August 2025. The DWER AER that was due previously in March 2025 has been moved to September 2025 by amendment of the Licence to align the reporting date with the rest of the WAN operations.
		A Compliance Assessment Report (CAR) will be submitted to the Compliance Branch at Government of Western Australia's Department of Water and Environmental Regulation (DWER) at an agreed date.	C	This document forms part of the fourth CAR that is due on 20 July 2026.
2.3.3	Incident Reporting	In recognition of the conservation status of the four species of significant fauna described in this TFVMP, OZ Minerals will report deaths directly attributable to the project. Relevant regulatory authorities (EPA, DBCA and Department of Mines, Industry Regulation and Safety (DMIRS)) will be notified within seven days of the death being recorded.	C	No deaths of any of the four species of conservation significant fauna were recorded during the reporting period.

FVMP Reference	Element	Requirements	Compliance Status	Evidence
2.3.4	Reporting to the Ngaanyatjarra Council	OZ Minerals will report key data from this TFMP to the Ngaanyatjarra Council, including: - Fauna deaths attributable to the WMP, including mortalities of species considered significant to the Ngaanyatjarra people. - Feral animal monitoring outcomes. These would be reported and/or presented in accordance with consultation and/or reporting schedules nominated within the Mining Agreement.	NC	- No project-attributable deaths of a culturally significant species were recorded during the reporting period. - Due to the reduction in the number of liaison meetings with the NgC during temporary suspension, the outcomes of the Winter 2025 survey were informally shared with the NgC during the NgC-BHP Monthly Environment and Approvals Meeting in August 2025. As this meeting routine was not continued in 2026, the outcome of the Summer 2026 survey has not been shared with the NgC.
3.1	Management Review	Review processes for the TFMP will be based on formalised dates after project commencement and triggers such as: - Monitoring results: If site-specific monitoring program results indicate that management targets are not being achieved. - Changes in knowledge: If new information about a species' use of the Development Envelope or region is received which would better inform management approaches. - Significant changes to project design: The relevance and effectiveness of existing management measures would be considered and amended as appropriate.	C	No changes were made to the TFMP in response to monitoring results, changes in knowledge or project design changes. TFMP is currently under review by BHP after having received comments from the NgC. Agreement with the NgC is that the TFMP will remain largely unchanged for the duration of temporary suspension, but that a significant changes will be required if the project resumes construction and operation,
		This Management Plan will also be reviewed and revised following any significant changes to the project from that described within the EPA Section 38 Referral (OZ Minerals, 2021). OZ Minerals will also review this plan within one year following implementation of the project, including a review of the management actions, monitoring methods and reporting requirements. Following any significant changes, the updated plan will be submitted to DWER for approval.	C	While the project has been placed in temporary suspension, that does not constitute the type of "significant change" contemplated by the requirement, and a review has consequently not been initiated on that basis.

TFMP Objective Based EMP Audit Table

Management Objective: Minimise loss of significant fauna habitat and fragmentation as a result of project-related land clearing Key Impacts and Risks: - Decrease in poorly represented fauna habitat as a result of land clearing for the pipeline and service corridor alignment - Significant decrease in richness and abundance of fauna, including significant fauna, as a result of interactions with project-related vehicles and machinery or entrapment - Increase richness and abundance of predator species resulting from project-related attractants (water and food sources) result in higher levels of predation of native fauna - Decrease in the richness and abundance of poorly represented fauna habitat and significant fauna species as a result of project-related altered fire regimes					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Clearing in accordance with internal land clearing procedure - Minimise amount of active cleared land	Total project-related land disturbance is to be within the approved Development Envelope and not to exceed the approved area	- Annual reconciliation of land access and disturbance-related survey data with the respective year's aerial imagery - Annual review of internal project-related land access and disturbance register relative to actual project-related land disturbance and LADPs	- Internal project-related Land Access and Disturbance Register and LADPs - Mining Rehabilitation Fund (MRF) annual reporting - Annual WMP Compliance Assessment Report	C	- Until temporary suspension, all clearing was authorised and controlled under Land Access and Disturbance Permits (LADP). - The LADP approval/planning process helped to minimize the extent of land clearing. - Monthly assurance was performed for each LADP by the permit holder to ensure compliance, especially with regard to the avoidance of heritage and ecological exclusion areas and remaining within the approved disturbance envelope. Disturbance was reported monthly using data obtained using survey methods. - All clearing records are maintained within the ArcGIS Online (AGOL) based system. - No clearing has been conducted since the start of temporary suspension. Should any clearing be conducted in future, it will be authorised, controlled and monitored under the WAN GLUP system. - The third MRF report was submitted to DEMIRS in June 2025 - This document forms part of the fourth CAR that is due on 20 July 2026.
Management Objective: Minimise death or injury to significant fauna in the Development Envelope as a result of project-related land clearing					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Undertake pre-disturbance surveys: - in Spinifex Sandplain habitat to map all active Great Desert Skink burrows - prior to proposed project-related land disturbance with adequate lead time (two months is recommended) to allow for design amendment to ensure avoidance of all active Great Desert Skink burrows - to undertake designation/demarcation as 'fauna exclusion zones' prior to project-related land disturbance - Fauna spotter present during all project-related land disturbance in Spinifex Sandplain habitat - Where relocation of burrows is required, this will be discussed/agreed with the Department of Biodiversity Conservation and Attractions prior to any relocation being undertaken	- No reasonably preventable death or injury to significant fauna attributable to project-related land disturbance activities - No loss of active Great Desert Skink burrows due to project-related land disturbance - The Ngaanyatjarra Ranger Teams will be invited to participate in pre-disturbance monitoring activities (subject to fair and reasonable commercial terms)	- Great Desert Skink burrow location and status data collected during pre-disturbance surveys. - Fauna spotter to record observations of significant fauna and burrows during project-related land disturbance in Spinifex Sandplain habitat, including written records and photographs, where appropriate - Records of engagement with the Ngaanyatjarra Council relating to participation in pre-disturbance survey work - Opportunistic identification of fauna mortalities	- Pre-disturbance survey records including significant fauna observations and fauna mortality records. - Fauna spotter recorded significant fauna observations including fauna mortality. - GIS records of pre-disturbance survey records, fauna exclusion zones and locations of significant fauna recorded by fauna spotter. - Annual WMP Compliance Assessment Report	C	- Pre-disturbance and pre-clearance surveys were conducted prior to any clearing being undertaken, as reported in the 2024 CAR. Records are maintained in the WMP document control system. - No clearing was undertaken in Spinifex Sandplain habitat during the reporting period.
Management Objective: Minimise death or injury to significant fauna as a result of interactions with project-related vehicles or machinery					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence

• Speed limits restricted to a maximum of 20 km/hr in close vicinity of Deep Sand Spinifex habitat, 60 km/hr in all other project areas, 80 km/hr on the main northern access road; with appropriate speed limit signage in place. • Off-road driving not permitted outside of cleared areas. • All fauna-vehicle interactions to be reported with time and location to allow investigation and data collection. • Personnel inductions include discussion of speed limit restrictions, requirements to report fauna-vehicle interactions and the non-compliance process	• No death or injury to Great Desert Skink, Brush-tail Mulgara, Southern Marsupial Mole or Striated Grasswren as a result of vehicle strike attributable to the project	• Quarterly review of records of speed limit non-compliances • Identification of traffic related fauna mortalities through incident report data collection and investigation	• Annual WMP Compliance Assessment Report • Internal incident reporting and non- compliance reporting • Fauna mortality records • Induction records • Regulatory agency notification of incident for significant fauna	C	• Speed limits are clearly demarcated on all roads and on tracks and conditioned in GLUPs issued for work in and adjacent to GDS habitat. No Work, other than environmental monitoring, is conducted in these areas. • Inductions include on-site driving requirements, prohibition of off-road driving, information on speed limits and fauna “right of way” rules. Induction records are maintained in the BHP human resources and training system. • No deaths of any of the four conservation significant fauna species were recorded during the reporting period. • Speed monitoring is conducted my means of the BHP In-vehicle Management System (IVMS), that reports all instances of speed limit exceedance to site supervisory personnel. No instances of speeding were recorded during the reporting period.
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Management Objective: Minimise adverse impacts on significant fauna as a result of project-related pipeline construction					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Undertake pre-disturbance surveys: - o in Spinifex Sandplain habitat to map all active Great Desert Skink (GDS) burrows - o Prior to project-related land disturbance with adequate lead time (two months is recommended) to allow for design amendment to ensure a minimum buffer distance of 50 m between active Great Desert Skink burrows and pipelines - o to undertake designation/ demarcation as 'fauna exclusion zones' prior to project-related land disturbance - Fauna spotter present during all project- related land disturbance in Spinifex Sandplain habitat - Daily fauna removal from trenches during pipeline construction - Fauna egress installed in open trenches during construction - Pipelines in Spinifex Sandplain habitat to be buried or elevated ≥100 mm above the ground at least every 100 m	- No death or injury to significant fauna attributable to project pipeline construction - No loss of active Great Desert Skink burrows due to land disturbance for project-related pipelines - The Ngaanyatjarra Ranger Teams will be invited to participate in pre- disturbance and disturbance monitoring activities (subject to fair and reasonable commercial terms)	- Great Desert Skink burrow location and status data collected during pre- disturbance surveys - Fauna spotter to record observations of significant fauna and burrows during project-related land disturbance in Spinifex Sandplain habitat, including written records and photographs, where appropriate - Records of engagement with the Ngaanyatjarra Council relating to participation in pre-disturbance survey work - Daily trench inspections with records of fauna removal during pipeline trenching activities	- Pre-disturbance survey records including significant fauna observations - Fauna spotter recorded significant fauna observations including fauna mortality - GIS records of pre-disturbance survey records, fauna exclusion zones and locations of significant fauna recorded by fauna spotter - Annual WMP Compliance Assessment Report	NR	Conditions relating to pipeline construction are not yet relevant as construction of the pipeline has not commenced.

Management Objective: Minimise adverse impacts to significant fauna as a result of project-related increase in feral animal abundance					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Install fencing around domestic waste facilities minimise access to waste - Construct and rehabilitate project borrow pits and all other constructed landforms to minimise permanent or long-term water holding - Develop, implement and update a Feral Animal Monitoring and Control Program within the Development Envelope for the operational phase in response to construction phase and ongoing monitoring results	- Minimise feral fauna species access to attractants (e.g. water sources and uncovered waste) - Minimise feral fauna species access to ponded water in constructed landforms, including borrow pits - Reduced observations of feral fauna species in project attractant areas (landfill, WWTP, water storage ponds, accommodation village)	- Quarterly feral animal monitoring and recording at attractant locations, including: - presence/absence - species - status of fencing - status of attractants (water storage, waste management) - Post-rehabilitation earthwork inspections - Post-rainfall inspections - Workplace inspections (WWTP, landfill, water storages) - Opportunistic fauna observations	- Internal incident reports - Annual MRF reports - Feral fauna species monitoring and control program records - Annual WMP Compliance Assessment Report	C	- Quarterly Feral Fauna audits were completed in September 2025 and March 2026. Month-long camera trapping surveys were completed in June 2025 and January 2026. Records are maintained in the SharePoint system. - During the 3rd quarter of 2025, a large numbers of camels were present in the mining agreement area, predominantly focusing on access to the open water source at the hard rock quarry. After good rains in January and February 2026, these herds left the area for the rest of the reporting period, only returning in moderate numbers in June 2026 (outside the reporting period). - Access to the WWTP turkey's nest was effectively prevented by the installation of fencing during the reporting period. - Various means of controlling the camel population were explored with the NCC, but it was clear that a regional, coordinated response would be required to make any impact. - The decision was made to focus on the protection of critical infrastructure (turkey's nest) with fencing and minimising drowning hazards for camels with the provision of egress netting in the washbay and old Exact turkeys' nests and monitoring ongoing access to the quarry. - The wild dog (including dingo) population have remained constant into temporary suspension. There has been a reduction in the number of reported interactions with wild dogs, mostly ascribed to more effective waste management (use of compactors) and the presence of only a small crew on site. Rules regarding fauna interaction are strictly enforced and awareness in the workforce regarding the dangers of habituation is high. - Rabbit populations are restricted to previously disturbed areas and do seem constant or in a slight decline, probably due to predation by dingoes. - There has been a small increase in the number of cats and foxes observed during camera trapping surveys, compared to previous periods.

Management Objective: Minimise adverse impacts to significant fauna as a result of project-related altered fire regime					
Management Action	Management Target	Monitoring	Reporting	Compliance Status	Evidence
- Develop and maintain a Fire Mitigation Plan and incorporate into the Asset Emergency Management Plan - Install and maintain fire extinguishers and firefighting equipment in the project area and on site to relevant Australian Standards - Install and maintain firefighting equipment in machinery and vehicles undertaking land disturbance activities - Project emergency response personnel trained in fire and bushfire response - Vehicles kept to access tracks or cleared areas - Develop and implement a Hot Work Permit system - Fire management practices developed in consultation with WA Department of Fire and Emergency Services (DFES) and the Ngaanyatjarra Council, including installation and maintenance of firebreaks if required - Site induction to include information on prevention, management and response to fires	- No unplanned fires attributable to project-related activities - Minimise the potential environmental damage from project-related extreme or out-of-control wildfires attributed to project-related activities	- Emergency response equipment inspections relative to relevant Australian Standards - Annual fire response training exercise including wildlife response - Annual review of fire break development for evidence of adequate installation and maintenance	- Internal incident reports - Internal project-related Land Disturbance Register and LDPs - Hot Work Permit register - Induction and training records - Annual WMP Compliance Assessment Report	C	- The Bushfire Management Plan (WM-0000-WHS-PLN-0009) was issued for use on 18 October 2024. - Quarterly fire appliance audits are conducted to ensure compliance with the commitments in this plan. Findings of the audits are maintained in the BHP document management system and actions raised in the BHP event management system, as required. - When construction was under way, all fire-fighting equipment was audited quarterly by the relevant contracting partner. Before and during temporary suspension, Mercury Fire is responsible for the quarterly audit and maintenance of BHP-owned firefighting equipment. - All vehicles and mobile plant are equipped with firefighting equipment that is checked daily as part of the pre-start inspection. - All emergency response personnel are trained in fire response and training is conducted weekly. - Site rules prohibit departure from defined access tracks during operations. Departure during Project development was conducted only as required and were monitored by inspections and LADP system reporting. No clearing has been done since going into temporary suspension. - All hot works outside designated workshop areas are subject to first obtaining a hot works permit. Before temporary suspension, records of hot work permits were maintained by the various contracting partners. Compliance to the hot work permit system was subject to regular WHS workplace inspections and audits. BHP did not perform hot work during construction. - No hot work has been performed outside workshop areas since entering temporary suspension. When required, such work will be performed under a hot work permit. - During total fire ban periods, DFES is notified by Site ERT prior to the commencement of hot works, where applicable. - A memorandum of understanding for Mutual Support in Planning and Responding to Emergency Incidents was concluded between DFES and OZ Minerals Musgrave Operations Pty Ltd on 22 August 2022 but was cancelled on 21 October 2024 as a result of the capability reduction the Project. - Firebreaks have been established around the perimeter of the accommodation camp, fixed plant, work areas and Aerodrome facility.

A6. APPENDIX 6 – STATEMENT OF COMPLIANCE

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	<i>The proposal is to develop two copper and nickel deposits (Babel pit and Nebo pit) within the West Musgrave Ranges of Western Australia.</i>
Statement Number	<i>MS 1188</i>
Proponent Name	<i>OZ Minerals Musgrave Operations Pty Ltd</i>
Proponent's Australian Company Number (where relevant)	<i>640 213 341</i>

2. Statement of Compliance Details

Reporting Period	<i>21/04/25 to 20/04/26</i>
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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
<i>This Statement of Compliance is included as Appendix 6 of the CAR. Audit tables for MS 1188 and the required management plans are Appendices 1 to 5 of the CAR.</i>	

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

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

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?
MS 1188 Condition 5-8
Was the implementation condition or procedure non-compliant or potentially non-compliant?
Potentially non-compliant
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?
20/4/2026

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
☐ 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 where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
Condition 5-8(2) specifies that BHP shall make the annual Greenhouse Gas report required under Condition 5-2 publicly available within two weeks of the report being submitted to the CEO. The report was not made available on the BHP Website within the specified period. This has since been corrected.
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
Not applicable
What was the cause(s) of the non-compliance or potential non-compliance?
An oversight on the part of the proponent.
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
A workflow process to publish the report on the BHP Regulatory information Web Page has been submitted.
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Scheduling for statutory reporting has been included in the SAP Work Management system to prompt compilation of the report, The associated work instruction will be improved to provide a reminder to publish the report on the BHP Web Page.
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

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

INITIALS:



- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)

The Greenhouse Gas Report was submitted to the CEO on 31/03/2026.

It has since been published on the BHP Regulatory Information Web Page.

Non-compliance/potential non-compliance 3-2

Which implementation condition or procedure was non-compliant or potentially non-compliant?

MS 1188 Condition 10-6 (4)

Was the implementation condition or procedure non-compliant or potentially non-compliant?

Potentially non-compliant

On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

21/7/2025

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?

☐ 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 where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?

Condition 10-6 (4) specifies that BHP shall make the Compliance Assessment Report publicly available in accordance with the approved Compliance Assessment Plan. The report was not made available on the BHP Website within the specified period. This has since been corrected.

What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)

Not applicable

What was the cause(s) of the non-compliance or potential non-compliance?

An oversight on the part of the proponent.

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?

A workflow process to publish the report on the BHP Regulatory information Web Page has been submitted.

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Scheduling for statutory reporting has been included in the SAP Work Management system to prompt compilation of annual CAR. The associated work instruction will be improved to provide a reminder to publish the report on the BHP Web Page.

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

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

INITIALS:



- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)

The 2025 CAR was submitted to the CEO on 20/07/2025.

It has since been published on the BHP Regulatory Information Web Page.

Non-compliance/potential non-compliance 3-3

Which implementation condition or procedure was non-compliant or potentially non-compliant?

Groundwater Monitoring and Management Plan

Was the implementation condition or procedure non-compliant or potentially non-compliant?

Potentially non-compliant

On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Multiple

1. Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?

☐ 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 where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?

Section 2.6.1 of the GMMP specifies that: In the event that monitoring, tests, surveys or investigations indicate an exceedance of a threshold criteria, OZ Minerals will report in accordance with the requirements of the relevant Ministerial Statement Condition(s).

At BMB10-D, the measured Electric Conductivity (EC) was consistently observed (i.e. stable) above the defined trigger (and intermittently above the threshold value), indicating there is statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)

BMB10-D, refer to attached map (Attachment 1)

What was the cause(s) of the non-compliance or potential non-compliance?

Statistical limitations in the baseline range, given that no foreseeable causal effect situated near this bore is noted (due to limited Project related activities).

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?

Nil, revise GMMP to address cause of potential non-compliance and correct baseline for natural and temporal variability in EC.

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

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

INITIALS:



Nil, revise GMMP to address cause of potential non-compliance and correct baseline for natural and temporal variability in EC.

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 Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)

This potential non-compliance was first reported to DWER on 1 July 2024. Further notification of this non-compliance was included in the cover letter for the 2025 CAR and this CAR.

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:



4. Proponent Declaration

I, James Ellen, *Site Senior Executive*

declare that I am authorised on behalf of OZ Minerals Musgrave Operations Pty Ltd
(being the person responsible for the proposal) to submit this form and that the information
contained in this form is true and not misleading.

Signature: 

Date: 17/07/2026

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:

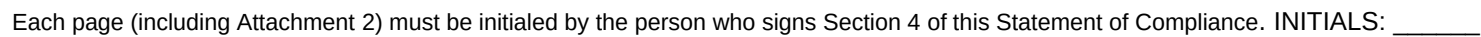


ATTACHMENT 1**Table 1 Compliance Status Terms**

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	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:



BHP