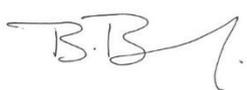


2024

EL10176, EL23700 & EL24371

# EXPLORATION OPERATIONS MINING MANAGEMENT PLAN AND PUBLIC REPORT WEST ARNHEM

|                | Author  | Reviewed by  | Approved by   |
|----------------|---|--|---|
| Date           | 6th February 2024   | 6th February 2024  | 6th February 2024   |
| Date (Amended) |   |  |   |
| Name           | Daniel Greene   | Lieth Farrally De Selincourt   | Brendan Bradley   |
| Signature      |  |  |  |

I Brendan Bradley, Managing Director declare that to the best of my knowledge the information contained in this mining management plan is true and correct and commit to undertake the works detailed in this plan in accordance with all the relevant Local, Northern Territory and Commonwealth Government legislation

Signature: 

Date: 06/02/2024

Authorisation: 0731-01 (2024)



## Sustainable Development Policy

DevEx Resource Limited is committed to ensuring the highest standards are met and will manage the social, health, safety, environmental and economic issues associated with all activities relating to our business. We aim to become a significant successful explorer and developer who understands that this can only be achieved by creating sustainable value for all stakeholders.

Specifically, we strive towards and are implementing systems to:

- Promote the company philosophy that the health, safety and welfare of all employees are paramount to the long term performance and growth of this company;
- Identify, assess and mitigate the hazards and risks identified with our activities, in accordance with DevEx's risk management strategy;
- Respect the traditions, customs, culture, dignity and rights of Indigenous communities;
- Consult with Indigenous communities regarding DevEx activities that could affect the cultural, social and economic well-being of these communities;
- Maintain ethical business practices that meet all legal standards as a minimum and have best practice as our target;
- Provide a workplace where everyone is treated fairly and is free from workplace harassment;
- Preserve the future land use of all our sites through biodiversity management and the rehabilitation of all land disturbed in its exploration and development activities in consultation with, government agencies, Indigenous communities, land holders and pastoral lease owners;
- Manage and minimise all waste streams through responsible design and by encouraging re-use and recycling;
- Develop partnerships that enhance the social and economic development of local communities;
- Operate in a transparent manner and develop open relationships with all stakeholders; and
- Regularly review all management systems and performance.



Brendan Bradley  
Managing Director

August 2023



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Appendix 8: Photo Monitoring Procedure

Appendix 9: Threatened Species Assessment

Appendix 10: Environmental Risk Register and Risk Rating Matrix

## Amendments

As per Section 41(3) of the *Mining Management Act*, an MMP reviewed and amended under Section 41(1)(a) is to clearly identify amendments made. These changes must be outlined in a table, including relevant page numbers, as per the example below.

| Section                        | Amendment  |
|--------------------------------|--|
| Sustainable Development Policy | 2023 updated policy included   |
| Section 1                      | Change of Key Contacts and Organization Chart (pp. 3)  |
| Section 1.1                    | Updated organizational structure (pp. 4)   |
| Section 1.2                    | Workforce description updated to reflect 2024 personnel requirements   |
| Section 2                      | Stakeholders list updated (pp. 5)  |
| Section 3                      | Camp setup details amended and tenement status table (pp. 7)   |
| Section 3.1                    | 2023 drilling summary entered (pp. 9)  |
| Section 3.1.8                  | 2023 exploration programme discussion (pp. 10)   |
| Section 3.2                    | Discussion of 2024 planned activities with figures and tables (pp. 13)   |
| Section 3.2.1                  | Updated heritage no go zone maps (pp. 17)  |
| Section 3.2.2                  | Workforce description amended to reflect 2024 planned workforce (pp. 17)   |
| Section 3.2.4, Section 3.2.5   | Amended to be in line with drilling procedures (pp. 18)  |
| Section 3.2.6                  | Table with 2024 exploration schedule (pp. 19)  |
| Section 4.1                    | 2023 rainfall chart inserted (pp. 21)  |
| Section 4.4.                   | Recent Threatened Species Assessments referenced (pp. 22)  |
| Section 5.1                    | DevEx Environmental Policy inserted (pp. 25)   |
| Section 5.3                    | Induction and training section amended to give detail of wet season operational updates and tailored inductions (pp. 27) |
| Section 5.4.1, Section 5.4.2   | Brought in line with updates to DevEx preclearing procedures (pp. 28)  |
| Section 5.4.3                  | Amended discussion of washdown procedures (pp. 29)   |
| Section 5.4.4                  | Implementation of GIS system discussed (pp. 30)  |
| Section 5.4.9.3                | Updated in line with 2024 RRWMP (pp. 33)   |
| Section 5.5                    | 2023 audit findings discussed (pp. 36)   |
| Section 6.1                    | 2023-24 safety performance indicators amended (pp. 37)   |
| Section 5.7                    | Emergency procedures now include additional wet season procedure (pp. 38)  |

|             |   |
|-------------|---|
| Section 6   | Brought in line with updates to post-drilling procedures, including updates to table 7 (pp. 39) |
| Section 6.4 | Security calculation updated to reflect 2024 operations and 2023 rehabilitation status (pp. 41) |
| Appendix 10 | Appendix 10 included with risk rating matrix  |

# 1. Operator Details

This Mining Management Plan (MMP) has been prepared by DevEx Resources Limited for activities at its West Arnhem Joint Venture (West Arnhem) Project which comprises EL10176, EL23700 and EL24371. The nominated operator of the project is DevEx Resources Limited (DevEx).

Since 2008, DevEx has been actively exploring in West Arnhem Land on the Nabarlek Mineral Lease and in Joint Venture with Cameco Australia Pty Ltd who held the previous MMP Authorisation 0309-01 over these exploration licences. Late in 2012, DevEx finalised an agreement to acquire Cameco Australia Pty Ltd’s remaining 60% interest in the tenements that previously comprised the West Arnhem Joint Venture. This acquisition gave DevEx the opportunity to secure 100% ownership and full exploration management of a contiguous land holding in the heart of the Alligator Rivers Uranium Field. In 2017 DevEx Resources acquired full ownership of the Project and has become the Manager and Operator.

Key DevEx personnel for the Nabarlek/West Arnhem operations in the Perth office are listed in Table 1.

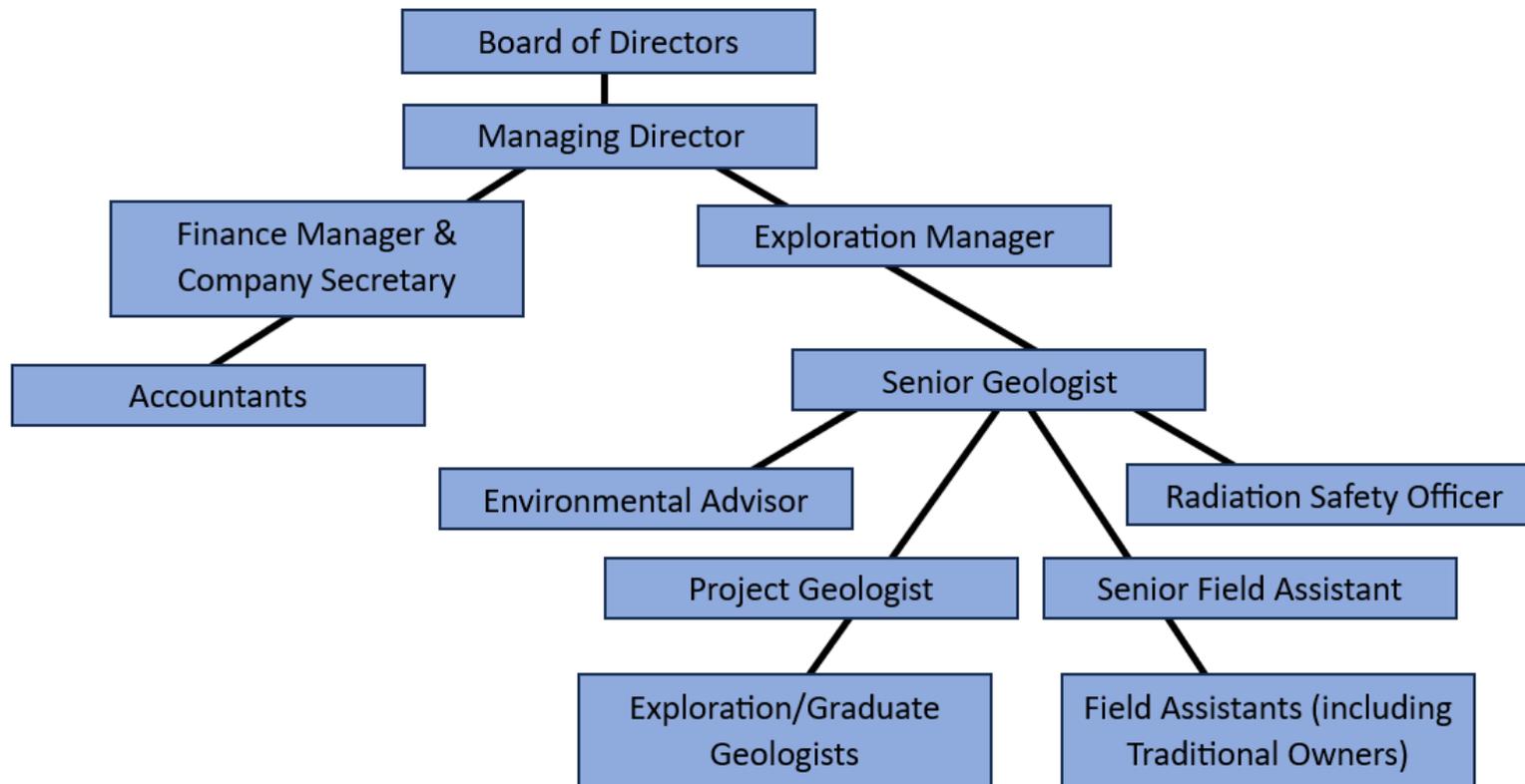
Table 1: Contact Details for Key Perth Staff

| DevEx Personnel  | Phone | Mobile | Email |
|--|-------|--------|-------|
| Managing Director<br>(Brendan Bradley)   |       |        |       |
| Exploration Manager<br>(Daniel Greene)   |       |        |       |
| Senior Geologist<br>(Lieth De Selincourt)  |       |        |       |
| Project Geologist<br>(Joshua Mallett)  |       |        |       |
| Level 3, 1292 Hay Street<br>West Perth, Western Australia 6005<br>Phone: 08 6186 9490<br>Fax: 08 6186 9495 |       |        |       |

## 1.1. Organisational Structure

The organisational chart for DevEx is shown in Figure 1.

Figure 1: DevEx Resources Limited Organisational Chart December 2024



## 1.2. Workforce

The workforce will consist of a maximum of 20 personnel at a time. Dry season exploration personnel will consist of DevEx staff and contract exploration personnel, including the Senior Project Geologist, Project Geologists, Contract Geologists, Field Assistants and a Chef.

In addition to the on-site personnel listed above there will be other personnel that will visit the camp periodically such as DevEx Perth-based geology staff and environmental consultants.

During the wet season the workforce at Nabarlek Camp will be smaller with a maximum of six people. Personnel will include DevEx field assistants, geologists and contract personnel

DevEx employs local Traditional Owners where possible. DevEx has consistently employed Traditional Owners during wet and dry season operations since taking over management of the site. The small size and infrequent nature of the Company's operations does not allow for a firm employment target for Traditional Owners to be set, although it is expected that in 2024 2-4 Traditional Owners at a time will be utilised to assist with the drilling, geophysics, soil sampling and rehabilitation.

## 2. Identified Stakeholders and Consultation

Current identified stakeholders include:

- Traditional Owners;
- Northern Land Council;
- Department of Industry, Tourism and Trade (DITT);
- NT WorkSafe;
- Department of Climate Change, Energy the Environment and Water (DCCEEW);
- Demed Aboriginal Corporation Adjumarllarl Rangers (DEMED);
- Njanjma Aboriginal Rangers
- Department of Land Resources Management (Bushfires NT);
- Weed Management Branch Department of Environment and Natural Resources;
- Arnhem Land Fire Abatement (ALFA);
- Warddeken Land Management; and
- DevEx Resources Limited.

The primary stakeholders for the Nabarlek region are the Northern Land Council (NLC) and the Aboriginal Traditional Owners (TOs). DevEx undertakes exploration and rehabilitation in line with existing agreements entered into between the Company, the NLC and the TOs.

Prior to undertaking exploration works each year, Work Area Clearance meetings are held with TOs and representatives of the NLC. At these meetings TOs are presented with the proposed exploration program where they have an opportunity to raise any questions or concerns prior to commencement.

Where required, a component of the work area clearance process is for archaeological and heritage clearances to be conducted prior to commencement of works and identify any No-Go zones or heritage zones removing them from the program. TOs may request these works, or in some instances they may request to have cultural monitors present.

A meeting to discuss the work programme for the West Arnhem and Nabarlek Project was held on the 24<sup>th</sup> and 25<sup>th</sup> October 2023 and permission was given for DevEx to proceed with the 2024 field programmes described within this Mine Management Plan.

DevEx participates in a number of forums to ensure consultation with stakeholders, which include:

- Mine Site Technical Committee (MTC) meetings; and
- Alligator Rivers Region Technical Committee (ARRTC).

Participation in ARRTC also ensures that other stakeholders are updated on activities being conducted within the Project. These stakeholders include:

- NT Environment Protection Authority (NT EPA);
- Department of Environment, Park and Water Security (DEPWS);
- West Arnhem Shire Council;
- NT Environment Centre;
- Australian Government - Department of Resources, Energy and Tourism;
- Australian Radiation Protection and Nuclear Safety Agency;
- Parks Australia North;
- Gundjeihmi Aboriginal Corporation;
- NT Department of Health (DoH);
- Other mining companies in the area; and
- Miscellaneous other members of the public with interest.

DevEx liaises with the Njanjma Rangers, Demed and ALFA about field activities and timing of weed control and bush fire management. In recent years, DevEx has engaged the Njanjma Rangers, Demed, and other traditional owners to carry out cool burns of the Nabarlek and West Arnhem Projects on exit tracks and within the areas planned for drilling and geophysics. This was carried out in advance of more regional bush fire management programmes. This reduced the risk of field staff in the Nabarlek and West Arnhem region being exposed to wildfire.

### **3. Project Details**

DevEx has been active in the Nabarlek Region since 2007 when the West Arnhem Joint Venture Agreement (West Arnhem) was signed with Cameco Australia Pty Ltd.

To participate in the Joint Venture, DevEx agreed to sole-fund exploration expenditure for a number of years (through DevEx's wholly-owned subsidiary GE Resources Pty Ltd) to earn a 40% stake in three granted exploration licences (EL10176, EL23700 and EL24371).

Late in 2012, DevEx finalised an agreement to acquire Cameco Australia Pty Ltd's remaining 60% interest in the tenements that previously comprised the West Arnhem Joint Venture (Table 3). This acquisition gave DevEx the opportunity to secure 100% ownership and full exploration management of a contiguous land holding in the heart of the Alligator Rivers Uranium Field. In 2017 DevEx Resources acquired full ownership of the Project and has become the Manager and Operator.

Table 2: West Arnhem Tenement Status

| Tenement | Holder               | Status  | Area (km <sup>2</sup> ) | Grant Date | Expiry Date |
|----------|----------------------|---------|-------------------------|------------|-------------|
| EL10176  | GE Resources Pty Ltd | Granted | 354.8                   | 1/9/2004   | 31/8/2024   |
| EL23700  | GE Resources Pty Ltd | Granted | 43.6                    | 31/5/2005  | 30/05/2025  |
| EL24371  | GE Resources Pty Ltd | Granted | 28.9                    | 1/9/2004   | 31/8/2024   |

Access to the Nabarlek Project area from Darwin is via the Arnhem Highway to Jabiru, northeast to Oenpelli then east via the unsealed and seasonal Oenpelli – Maningrida road ). Access within the tenement and surrounding tenements is good, mostly being flat lying and accessible by four wheel drive vehicle. Exceptions are the heavily dissected sandstone escarpments that are best traversed by foot and accessed by helicopter.

The 2024 work program will be operated out of the Nabarlek Camp which accommodates a small-scale wet season and expanded dry season camp. It is located adjacent to the Nabarlek airstrip for both convenience and safety considerations.

A transportable office block, ablutions, storage, bunded fuel, and dangerous goods containers are on site throughout the year.

The camp generator, light vehicles and drilling vehicles will be serviced by a diesel bulk storage tank and adjacent spill kit, refilled regularly by fuel deliveries directly to the Nabarlek camp. Opal fuel is stored within drums on a bunded pallet, available for use via hand pump.

A temporary ablutions block has been hired and connected to the established septic system (tank and soakage trench) which was installed by licenced plumbers when the original ablution block was established in 2008.

There is an existing water bore in the camp environs that has suitable water quality, water depth, and location and provides sufficient volumes of water. The camp bore is being treated via a triple action, whole house UV filtration system for washing and domestic use. Bottled water is used for drinking. Regular water testing is performed on this water source, with samples provided to Darwin Water Microbiology Laboratory.

Measurement of the standing water level (SWL) in the camp bore commenced in the 2012 dry season. The measurements, although irregular, do indicate that there were no draw-down effects on groundwater levels from on-site activities. Measurement of the standing water level in the camp bore will continue to be undertaken during the 2024 dry season with the recommencement of the exploration program.

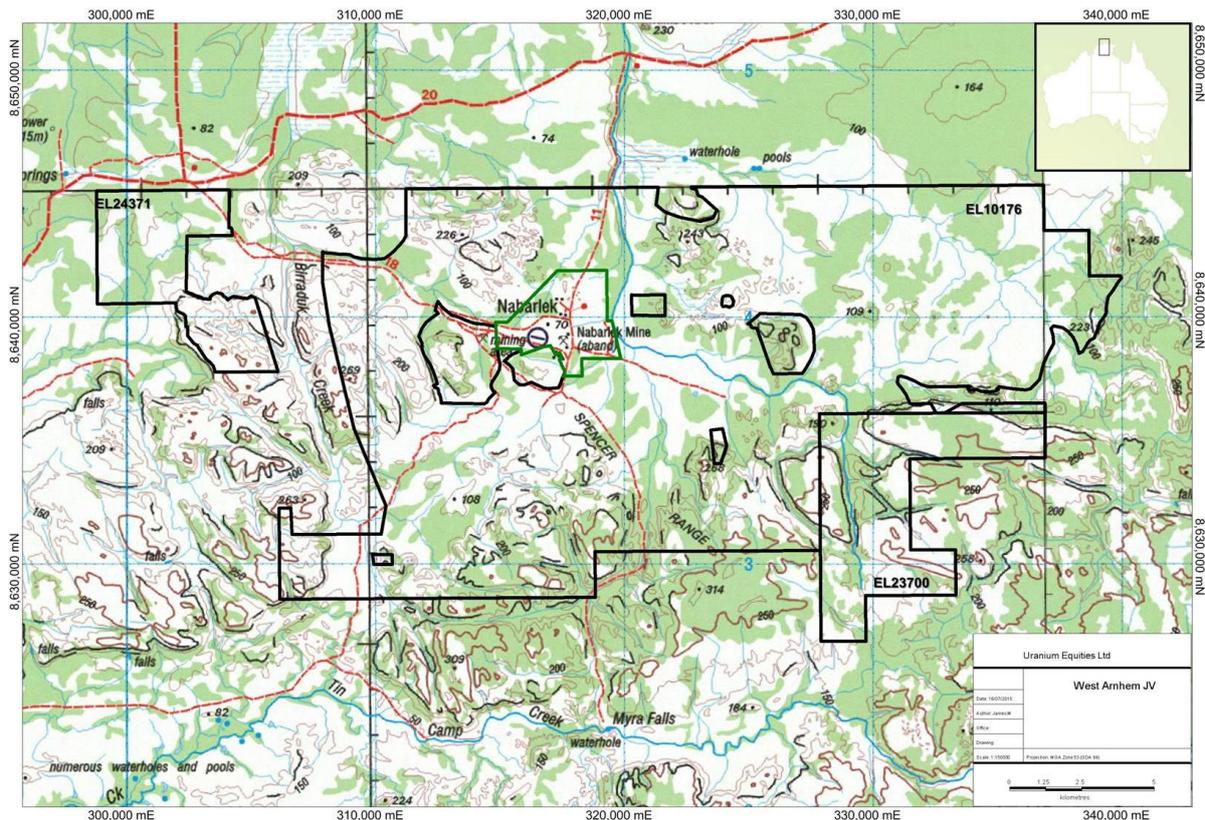


Figure 2: Location of West Arnhem Project (ELs 10176, 23700 & 24371)

### 3.1 Previous Activities and Current Status

#### 3.1.1. Historical Exploration

The area covered by the West Arnhem licences was held by Queensland Mines Pty Ltd (QMPL) between 1969 – 1998 as EL2508. During this period due to political issues and uranium prices, exploration was only active for a small part of this time.

Exploration work by QMPL consisted of airborne radiometric and magnetic surveys, regional stream sediment geochemistry, regional geochemical soil sampling, regolith geochemistry, ground total count radiometric surveys, reconnaissance exploration and geological mapping.

From 1998 – 2003 a Joint Venture agreement between AFMEX, Cameco Australia and SAE Australia explored the region after acquiring the exploration licence from QMPL. Exploration Retention Licences (ERL) were lodged over those portions of EL2508 that were considered the most prospective and the remainder was allowed to expire. On 20 May 1999, the joint venture partnership was granted ERL’s 150 – 152.

Exploration during this period consisted predominantly of drilling programs testing a number of targets before the licences were relinquished in 2003.

In 2004, Cameco Australia lodged an application for EL10176, covering the former EL2508 and ERL’s 150 – 152.

Exploration work conducted by Cameco in the Nabarlek Region since 2004 has had a strong geophysical emphasis, consisting of numerous airborne geophysical surveys, minor ground-based geophysical surveys and drilling programs.

Cameco’s work focused on following up previously identified anomalies from past explorers and attempted to generate new prospects from the geophysical datasets. Most of this recent work

focused on the traditional unconformity model with very little work done on targeting deeper structurally controlled basement-hosted or dolerite-hosted mineralisation.

DevEx has operated in the region with a different exploration emphasis with an exploration model based on the strong structural control on mineralisation. DevEx’s exploration program consisting of structural targeting, geochemical sampling using aircore and follow-up reverse circulation drilling has discovered new areas of significant upside potential on both the Mineral Lease and the surrounding West Arnhem licences.

Drilling conducted during the 2023 field season is summarised below.

Table 3: Drilling summary for 2023

| Mining Interests (i.e. titles)                                 | EL10176  | EL23700 | EL24371 |
|--|--|---------|---------|
| Number of holes drilled  | 221  | Nil     | Nil     |
| Maximum depth of holes   | 318m   | Nil     | Nil     |
| Length of line / track cleared<br>(Kilometres: x Width: m)     | 9200m x 3.0m                                     | Nil     | Nil     |
| Number of sumps cleared (Length:<br>x Width: x Depth: m)       | 300 (6x3x1.5m)                                   | Nil     | Nil     |
| Number of drill pads cleared<br>(Length: x Width: m)           | 221 (25X30m)                                     | Nil     | Nil     |
| Number of costans excavated<br>(Length: x Width: x Depth: m)   | Nil  | Nil     | Nil     |
| Total bulk sample pits excavate<br>(Length: x Width: Depth: m) | Nil  | Nil     | Nil     |
| Camp area/s cleared  | 0 (existing camp at historic Nabarlek mine site) | Nil     | Nil     |
| Total area disturbed (hectares)                                | 19.34  | Nil     | Nil     |
| Drill holes capped/plugged                                     | 221  | Nil     | Nil     |
| Total area rehabilitated (hectares)                            | 19.16  | Nil     | Nil     |

### 3.1.8 2023 Exploration Programme

Exploration during 2023 consisted of a total of 210 RC holes for 31634m and 11 DD holes for 2403.6m.

Results from the 2023 exploration program have been highly encouraging. DevEx conducted a major new phase of Reverse Circulation (RC) drilling to follow up on high-grade intercepts generated from the 2022 drilling campaign. The drilling tested multiple target areas across the EL0176 tenement, with the focus being around the Nabarlek North, Nabarlek South, U40 and U42 prospects.

Exceptional results and improvement on conceptual understanding throughout the RC program lead to the employment of a DD rig. This short DD programme targeted 2023 intercepts at the U40 and Nabarlek South prospects to solidify structural understanding. This was connected with a full structural review by Model Earth Geological Consultancy.

Other targets tested included: Zeus, GC11 and Overload.

Ground gravity surveying was conducted over the Nabarlek North and U40 prospects and has aided with further understanding and delineating of the structural controls of these areas. This work is anticipated to be continued in the 2024 season over a broadened area to assist with future targeting.

Additional petrographic and spectral work is expected to be undertaken on 2023 drilling samples.

#### U40

At the U40 prospect, drilling to test the U40 fault immediately north and south of previous high grade intercepts including 6m @ 7.6% U3O8 from 75m (NAR7492) was a priority. Step-out drilling of previous high-grade intercepts has successfully identified an extension to the main uranium-bearing fault zone.

DevEx's 2023 drilling campaign has defined a significant strike extent of over 500 metres to the fault hosted uranium mineralisation (U40 Fault Zone) that lies beneath the unconformity between the overlying Kombolgie Sandstone and the underlying Cahill Formation. This type of fault-hosted uranium mineralisation in altered Cahill Formation rocks is typical of all the major uranium deposits in the region

The uranium mineralisation is interpreted to be open to the south, where the U40 fault system is interpreted to continue for several kilometres and will form a foundation for 2024 targeting.

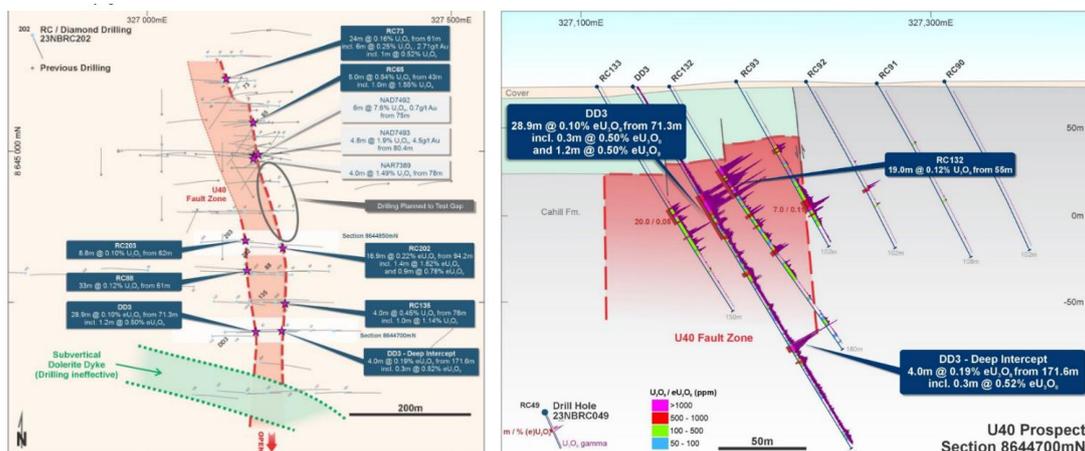


Figure 3 U40 Geological Framework

## Nabarlek South

Nabarlek South drilling looked at testing the broader open-ended uranium system between the GC11, Nabarlek South and Coopers Prospects. Previous intercepts include 10.1m @ 1.10% U<sub>3</sub>O<sub>8</sub> from 123.4m (22NDDD02) and 54.6m @ 0.2% U<sub>3</sub>O<sub>8</sub> from 76.5m (22NBDD27).

Nabarlek South has for the first time encountered uranium mineralisation at the unconformity between the Kombolgie Sandstone and underlying Cahill Formation, including an intercept of 2.0m @ 0.77% U<sub>3</sub>O<sub>8</sub> and 0.6g/t Au from 132m (RC 37).

Follow-up drilling is defining a significant offset in the unconformity indicative of the Nabarlek Fault and is supported by a new gravity survey. The survey successfully identified several key structures including the prospective Nabarlek Fault north and south of the mine site, with several parallel north-west structures to the east of Nabarlek being identified for further attention. A review of the data is underway to assist with 2024 targeting.

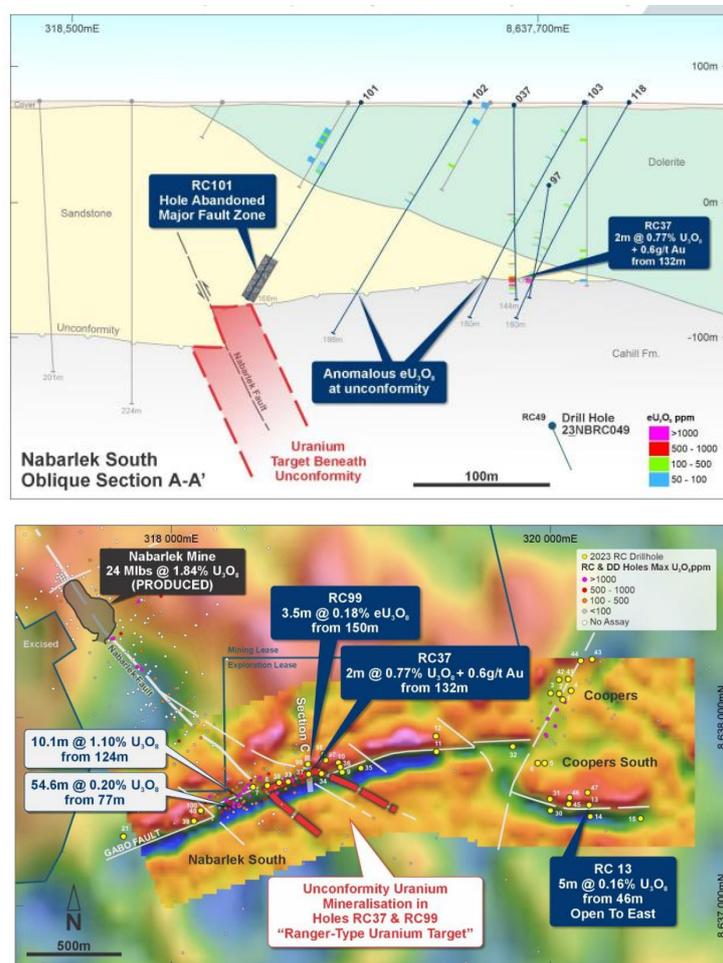


Figure 4 Nabarlek South Geological Framework

## U42

U42 follow-up drilling targeted an extension on 2022's high grade intercept of 2m @ 0.6% U<sub>3</sub>O<sub>8</sub> from 188m (22NBRC214).

Significant mineralisation was encountered in both the overlying dolerite and deeper basement hosted mineralisation similar to 22NBRC214.

To provide clarity to the setting of the basement hosted mineralisation a diamond rig was used to test a significant intercept in 23NBRC139 (1.1m @ 1.59%). A pair of diamond holes were drilled

adjacent to the RC hole to test the structural controls on the basement mineralisation.

The U42 system can be seen to be an extension of the wider U40 fault system and remains prospective to the north and south, a key focus for 2024 targeting.

### Nabarlek North (previously termed SMLB)

Broad-spaced drilling to the north-west of the Nabarlek Uranium Mine has previously intersected an extensive system of uranium mineralisation along the Nabarlek Fault. With previous drilling too broad spaced to effectively test a Nabarlek scale deposit, intercepts such as 6m @ 0.2% U3O8 from 103m (NASMD0229)3, including 1m @ 0.5% U3O8, provided a compelling reason for further drilling adjacent to these intercepts.

Step-out Reverse Circulation (RC) drilling has intersected significant shallow uranium equivalent mineralisation 20m to the south-east of previous intercepts reported in hole 122 of 4.6m @ 0.32% eU3O8 from 47m, incl 0.7m @ 0.83% eU3O8. Drilling results from two holes spaced 40m apart (see Figure 2) include:

- o 11.2m @ 0.33% eU3O8 (3,300ppm) from 41.0m (RC 174), including: 5.1m @ 0.51% eU3O8 (5,100ppm)
- o 21.5m @ 0.11% eU3O8 (1,100ppm) from 36.0m (RC 173), including: 1.3m @ 0.61% eU3O8 (6,100ppm)

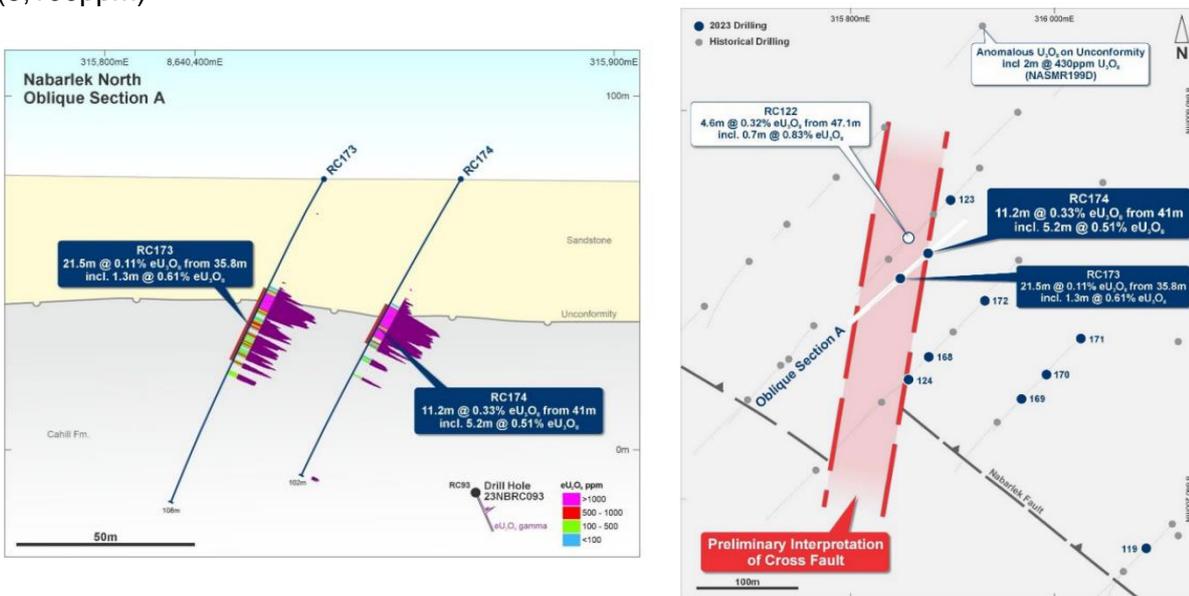


Figure 5 Nabarlek North Geological Framework

The 2023 exploration program yielded promising results -notably in 23NBRC173 and 174 - identifying follow up drill targets for drilling in the 2024 field season.

## 3.2. Proposed Activities

Planned exploration for the 2024 year is expected to increase in activity following a successful 2023 field campaign. DevEx is seeking approval for 310 drillholes in 2024. Of this, 90% of the allocation will be RC while 10% may be diamond drilling. An approximate guidance by prospect is provided in Table 3.

The 2024 program will build on the success of the 2023 drilling program, and continue to delineate and define existing targets, as well as test new targets.

In addition to drilling, DevEx aims to conduct a number of generative exploration activities in order to advance a number of early stage and conceptual exploration targets. This will include geophysical surveying and mapping within the West Arnhem tenement packages.

Surface geochemical sampling entails a team of two DevEx staff, contractors traversing the surface taking soil samples (< 0.5kg) from shallow hand dug holes over a pre-defined gridded area. Once sampling is completed the shallow pits < 30cm deep, that are backfilled, and any surface cover removed is replaced. Work areas will be accessed on foot from the nearest existing tracks. No clearing is required. Surface sampling may be undertaken at any point during the work schedule depending on the Company's requirements.

A new proposed program was presented and approved at a TO meeting in October 2023. All suggested work areas and work programs were consented (outlined in Table 3), with exception of U65 and Nabarlek Granite areas, that require a site visit by cultural magangers before consent is given. This will likely take place at the start of the dry season.

Figure 6 2024 Proposed Work Areas, with No Go Zones marked in red hatch (to be excluded in public version).

Table 3: 2024 Proposed exploration by prospect

| Prospect                                  | Tenement           | Work Proposal   | Activity   | Target / Rationale  |
|---|--------------------|---|--|---|
| <b>Airborne Survey</b>                    | EL10176            | Airborne Magnetic and Radiometric Survey (Eastern)  |  | DevEx plans to continue with its airborne magnetic and radiometric survey on the eastern half of EL10176.   |
| <b>K Eye</b>                              | EL10176            | Surface Geochemistry<br>Drilling <sup>2</sup>   | 50 to 100 samples<br>10 drill holes                    | Radiometric anomaly (Potassium) seen in 2022 airborne survey requires investigation with surface geochemistry. Follow up drilling if positive results are identified in surface geochemistry.   |
| <b>Overload</b>                           | EL10176            | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 2 weeks of geophysics<br>400 samples<br>20 drill holes | Several historical uranium prospects which were drilled in the 1990's show promising signs of uranium mineralization. DevEx plans to continue with surface geochemistry and ground geophysics to clarify the full length of these targets.<br><br>Ongoing drilling of targets is planned for the 2024 year.   |
| <b>SW Overload</b>                        | EL10176            | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup>                                    | 100 samples<br>5 drill holes                           | Prospective geology associated with the Gabo Fault extends from Nabarlek South/ Overload to the southwest over the work area. DevEx plans to continue with initial surface geochemistry. Follow up drilling may be completed drilling if positive results are identified.   |
| <b>Airstrip and Nabarlek North (SMLB)</b> | EL10176<br>MLN962  | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup>                                    | 100 samples<br>30 drill holes                          | Several historical uranium prospects were drilled between 2000 to 2015 show promising signs of uranium mineralization. Drilling in the 2023 field season has returned further positive results. DevEx plans to continue with drilling and may complete additional ground geophysical surveys to clarify the full length of these targets. Recent 2022 Airborne geophysical survey in combination with newly acquired ground gravity datasets has highlighted broader targets in this area which require further drilling along multiple northwest trends at Airstrip and Nabarlek North in 2024 continuing on from the 2023 work program. |
| <b>Nabarlek Trend</b>                     | EL10176<br>MLN 962 | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 400 samples<br>35 Drill Holes                          | The Nabarlek area combines a series of exploration targets that includes the Nabarlek South and North Buffalo Prospects. Newly acquired ground geophysics within the Nabarlek region has defined several targets that require follow up drilling. Trail geochemical surveys will also be implemented.   |
| <b>Nabarlek Trend South Extension</b>     | EL10176            | Surface Geophysics <sup>3</sup><br>Drilling <sup>2</sup>                                      | 20 Drill holes   | Newly acquired (2023) ground geophysical datasets suggest Nabarlek prospective fault extends further to the south and remains untested. DevEx planning reconnaissance drilling of these targets in 2024.  |
| <b>Coopers East</b>                       | EL10176            | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup>                          | 50 Samples<br>10 Drill holes                           | A legacy ground gravity dataset suggests a major fault, possible associated with uranium mineralisation at Coopers prospect extends   |

|  |                    |  |                               |  |
|--|--------------------|--|-------------------------------|--|
|  |                    | Drilling <sup>2</sup>                                      |                               | further to the east. DevEx has drilled this fault in 2023 with positive results received. Initial surface geochemistry and ground geophysics to define targets before reconnaissance drill testing in 2024.  |
| <b>Old Camp &amp; Old Camp Extension</b> | EL10176<br>MLN 962 | Drilling <sup>2</sup>                                      | 15 Drill Holes                | Drilling is planned to follow up on uranium mineralization intersected in historical drilling. With prospective northwest trending controlling faults identified in geophysical datasets.  |
| <b>Cowboy</b>                            | EL10176            | Drilling <sup>2</sup>                                      | 10 Drill holes                | Historical drilling, and surface geochemistry has defined several drill targets within the Cowboy anomaly associated with the prospective Gabo Fault. Drilling was abandoned this year due to ground conditions. Drilling is planned in 2024 to follow up on these results with a more suitable drill rig.   |
| <b>GC11</b>                              | EL10176            | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 50 Samples<br>10 Drill holes  | Reconnaissance drilling of the Gabo Fault related targets at GC11 has been completed in the 2023 season, with several holes returning anomalous uranium and gold. The recent 2022 airborne geophysical survey has identified a significant uranium anomaly in the GC 11 area. This anomaly requires surface investigation and surface geochemical sampling. Drilling into this anomaly is planned for the 2024 dry season. |
| <b>Big Radon</b>                         | EL10176            | Drilling <sup>2</sup>                                      | 10 Drill holes                | Drilling is planned to target an extensive Radon anomaly located north of the sandstone escarpment. Drilling is reconnaissance in nature and 10 holes should be an adequate first pass test to determine whether there is any uranium mineralization beneath the radon anomaly.  |
| <b>Little Radon</b>                      | EL10176            | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 100 samples<br>10 Drill holes | Surface Geochemistry and Drilling is planned to target a uranium anomaly identified in the 2022 Airborne geophysical survey. Previous drilling in the area missed the main anomaly. Drilling is reconnaissance in nature and 10 holes should be an adequate first pass test to determine whether there is any uranium mineralization beneath the anomaly.  |
| <b>KP</b>                                | EL10176            | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 20 Samples<br>5 Drill holes   | Airborne geophysics has identified a broad radiometric anomaly (U/Th) at KP. Plans to drill KP Prospect were postponed this year to high priority targets.<br><br>Field reconnaissance followed by drilling is now planned for the 2024 period. Drilling is reconnaissance in nature with 5 planned holes an adequate first pass test to determine whether there is any uranium mineralization beneath the anomaly.        |
| <b>Nabarlek Granite</b>                  | EL10176            | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 200 Samples<br>10 Drill holes | The Nabarlek granite area is a conceptual target covering the contact positions of the Nabarlek granite with surrounding host rocks. Historic exploration has largely overlooked this as a possible favorable position to host   |

|                             |         |   |                               |   |
|-----------------------------|---------|---|-------------------------------|---|
|                             |         |   |                               | uranium mineralization. Reconnaissance surface geochemistry is planned for 2024, with reconnaissance drilling to follow should anomalies be identified.   |
| <b>Quarry Fault North</b>   | EL10176 | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 150 Samples<br>50 Drill holes | Inclusive of U42 and U40 prospects. Historic and more recent drilling in 2022/2023 drilling has intersected significant uranium mineralization at both prospects, spatially associated with the broader quarry fault corridor. Drilling in 2024 will be extending the 2023 program. Additional ground geophysics, surface geochemistry and drilling is planned to test for uranium mineralization beneath the laterally extensive shallow dolerite.                               |
| <b>Quarry Fault Central</b> | EL10176 | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 40 Samples<br>20 Drill holes  | This area covers the central portion of the quarry fault corridor on EL10176. Review of available airborne geophysical datasets indicates the prospective stratigraphy and structure continues to the south of U42. Most historic drilling within the area is limited to shall AC/RAB which may not have tested the basement rocks effectively. Additional ground geophysics and surface geochemistry may be required to further define drill targets for the 2024 field season.  |
| <b>Quarry Fault South</b>   | EL10176 | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 100 Samples<br>20 Drill holes | This area covers the southern portion of the quarry fault corridor on EL10176. Review of available airborne geophysical datasets indicates the prospective stratigraphy and structure continues to the south of U42. Most historic drilling within the area is limited to shall AC/RAB which may not have tested the basement rocks effectively. Additional ground geophysics and surface geochemistry may be required to further define drill targets for the 2024 field season. |
| <b>Zeus</b>                 | EL10176 | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 100 Samples<br>10 Drill holes | Several RC holes at Zeus were completed in 2023 with results still being reviewed.<br><br>The broad radon anomaly and various geological/structural targets require further drilling. Historical drilling encountered anomalous gold, copper and uranium mineralization. DevEx plans to broaden its drill coverage in 2024 over the prospect area.  |
| <b>Far East</b>             | EL10176 | Surface Geophysics <sup>3</sup><br>Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup> | 50 Samples<br>5 Drill holes   | A historical radon anomaly has seen shallow RAB/AC drilling of the target that is considered to be ineffective. Planned exploration activities during the 2023 period have been put on hold due to drill rig availability. The Company is planning to carry out further work here during the 2024 period.   |
| <b>U65</b>                  | EL10176 | Surface Geochemistry <sup>1</sup><br>Drilling <sup>2</sup>                                    | 20 Samples<br>5 Drill holes   | The U65 Prospect is a prominent radon and ground radiometric anomaly found during 1989 ground surveys. RC drilling in 1992 showed weak uranium mineralisation occurred. Review of historic data has identified this area to require follow-up work, to be completed in 2024.  |

### **3.2.1 Historical, Aboriginal, Heritage Sites**

Sacred, cultural and heritage sites mapped in the region are noted on the attached maps. All site locations are recorded on digital plans and are designated as 'No Go' areas and reported to contractors as areas to not enter. Cultural Monitors are required at certain prospects as directed by the work program outcomes.

Figure 7 Heritage No Go Zones relative to 2024 work program areas (to be excluded in public version).

### **3.2.2. Workforce**

Geophysical survey contractors will typically carry out the various surveys either on foot or using light vehicles with no disturbance. Access will be along permanent tracks and tracks established from previous drilling. Survey crews will either provide their own facilities or share the main facilities set up at the Nabarlek Camp.

Drilling contractors for the various drilling programs will typically comprise 3 to 7 staff depending on the drilling method and shift pattern. The drilling contractor will provide their own camping and accommodation whilst on site. As much as possible, the drilling personnel will be camped at the main Nabarlek camp area or the concrete slabs at the old mine site. Domestic, and other waste associated with the operations of the Camp will be removed and disposed of as per this MMPs Waste Management plan (discussed in the sections below).

Employment of Traditional Owners groups will continue to form an integral part of DevEx's staffing needs, with Traditional Owner/Local Aboriginal peoples commonly filling the position of Field Assistant.

DevEx aim to maximise the number of Local Aboriginal People employed in connection with the Project and to aid those involved to develop skills and experience so that they are better equipped for long-term employment in connection with the Project and any possible future Production Operation.

The Company will make its best endeavours to ensure the number of Aboriginal Employees employed on site in connection with the Project amounts to at least 20 percent of the total workforce. This is subject to there being enough suitable positions and sufficiently qualified persons to fill these positions.

The Company will take all reasonably practicable steps to ensure that the working hours and conditions of Local Aboriginal People employed by the Company accommodate their cultural needs.

### **3.2.3. Airborne and Ground Geophysical Surveys**

DevEx plans to continue ground based geophysical surveys such as ground gravity and IP across select prospect scale areas of the exploration leases. The survey methodology does not involve ground disturbance.

### **3.2.4. RAB, AC, RC and Diamond Drilling**

Heritage No-Go zones are avoided during hole preparations (Figure 7).

RC and diamond drill sites will require preparation to allow access for the rig and support vehicles. Drilling pads are prepared in line with DevEx's drill procedures. Drill pads are kept as small as reasonably practicable to minimise ground disturbance (typically 30X20m or less). Each RC drill site

will have a minimum of 1 drill sump, with the possibility of a several more being required where higher volumes of water are encountered, and diamond drill sites a minimum of two sumps.

In the event of excess water being encountered such that available drill sumps are deemed insufficient to contain theorised water output, drilling will be put on standby. If the hole is required to be continued, excess sumps will be dug in line with anticipated water content. If feasible, water will be pumped to nearby sumps. In the event that neither of these options are possible, drilling will cease.

Drill rigs will be accompanied by support vehicles carrying drill rods and water for the drilling operations. A 4WD tray-back utility or similar will transport the drill crew and geological staff from the campsite to the drill rig.

Water for the purpose of exploration activities will be required for RC/Diamond holes and dust suppression. The company plans to source water for drilling operations via several methods including existing bores, recently drilled RC holes and from permitted extraction points of running surface water. A water meter is used to measure volume of extraction from these extraction points as per Permitting requirements (Surface Water Extraction Licence #8211003).

### 3.2.5. Access Tracks

Existing tracks will be utilised wherever possible. A loader will be utilised to refurbish existing access tracks as required by the exploration program. The access tracks will only be refurbished to the same width as the existing tracks (no greater than 3 metres) to allow safe passage of 4WD vehicles and drill rigs as required.

Care will be taken when constructing new approved tracks to limit damage to vegetation and minimise soil erosion, with the practice of realised blade clearing being employed to reduce the time required for tracks to naturally revegetate as per DevEx preclearing policy (Appendix 7). All new tracks will be walked prior to clearing with a cultural manager as per the requirements of the work programme approval.

### 3.2.6. Exploration Schedule

Table 10 details the proposed exploration schedule for 2024 (subject to travel restrictions, contractor and equipment availability).

Table 4 2024 Exploration Schedule

| Class                             | Duration | Timing         | Quantity               | Location                 | Status   |
|-----------------------------------|----------|----------------|------------------------|--------------------------|----------|
| Ground Gravity                    | 2 weeks  | February 2024  | 2 personnel            |                          | Planned  |
| RC/DD onsite review               | 2 weeks  | February 2024  | 2 personnel            | Nabarlek Camp            | Planned  |
| Camp setup                        | 2 weeks  | April-May 2024 | 2-4 personnel<br>DevEx | Nabarlek Camp (Airstrip) | Planning |
| Weed Occurrences on Access Tracks | 1 week   | May 2024       | 2 personnel            | 2023 Access Tracks       | Planning |

|   |           |                                 |  |                           |   |
|---|-----------|---------------------------------|--|---------------------------|---|
| Track refurbishment for drilling                  | 7 days    | April-December 2024             | 2.5km, Cultural Monitor and DevEx Personnel  | 2023 Access Tracks        | Planning  |
| Surface geophysics                                | 4 Weeks   | May-October 2024                | 2 Geophysical crew   | Airstrip & Nabarlek North | Planning  |
| Track, pad and sump clearing for RC / DD drilling | Ongoing   | April-November 2024             | 30km & 310 pads<br>1-2 TO's and DevEx Operators                                    | 2024 Proposed Work Areas  | Planning  |
| RC/DD drilling                                    | Ongoing   | May-November 2024               | 310 drill holes for 50000m<br>TOs and DevEx Field Staff                            | 2024 Proposed Work Areas  | Planning  |
| Drill pad and access track remediation            | Ongoing   | April-November 2024             | Remediation of drill sites including back filling of sumps and removal of rubbish. | 2024 Work Areas           | Remediation works planned once results are received and final sampling complete |
| Camp closure                                      | 4-6 Weeks | November-December 2024<br>April | 2 DevEx personnel to close the camp at Nabarlek for the Wet Season                 | Nabarlek Camp             | Planning  |

### **3.2.7. Surface Water as an alternative source for Reverse Circulation and Diamond Drilling**

Water for the purpose of exploration activities will be required for RC/Diamond holes. At present it is estimated that a maximum of 1,000L may be required for every RC drill hole, with diamond drill holes potentially requiring around 10,000 to 15,000 litres meaning some 310,000L (RC only drilling) to 765,000L (mixed RC / DD drilling) will be required for dust suppression and combined RC and diamond drilling.

The company plans to source water for drilling operations via several methods:

- a) DevEx currently holds 2 surface water extraction licences over MLN962 and EL10176. Licence 8211003 granted in 2020 which covers extraction points on Coopers Creek adjacent to the Nabarlek Mine site, and newly granted License 8211041 (2023) which covers the eastern portion of the EL. Both licenses include a maximum volume of extraction 0.5ML/year each across designated extraction points. This brings a total volume of 1 ML/year permitted accessible surface water. The Nabarlek Camp water bore can be also utilised for exploration activities, given it would be well short of the 5ML requirement for a permit. Volumes of water required for exploration activities within the West Arnhem tenements will fall below the current water allocations and extraction rates. This water will be extracted from either of these locations and transported to drill holes using a water truck. Any surface water extraction points will utilise an extraction meter, following the terms of the license.
- b) In the event of drilling encountering groundwater within the exploration holes, this water can also be recycled into the sumps for use in both the RC and Diamond phases of drilling.
- c) In the event that surface water can be sourced from areas closer to the drilling operations, the Company may also apply for a second Surface Water Extraction Licence or alternatively amend the current Surface Water Extraction Licence #8211003 if appropriate to do so.

Where the Company is utilising its Surface Water Extraction Licence the Company plans to Draw down a maximum of 20% of the ponded water after which it will move to different water ponds should additional draw down be required. Marker stick system will be utilised to measure 20% draw down within a given pond.

## **4. Current Project Site Conditions**

### **4.1. Climate**

The West Arnhem project is located in the tropical region of the Northern Territory. This tropical environment is characterised by two distinctive seasons, the 'wet' and the 'dry'. From October/November through to March/April, high rainfall and humidity brought on by monsoonal weather patterns are distinctive of the wet season. The majority of the annual rainfall experienced in the region falls within these months. Cyclones and ex-cyclones can also be experienced within this time frame bringing high winds and increased rainfall.

The average rainfall at Jabiru Airport (Bureau of Meteorology Station Number: 014198), is shown in Figure 8. This recording station has been used as it is the closest recording station to the Nabarlek Mine with a full set of records. Nabarlek does not have its own weather station.

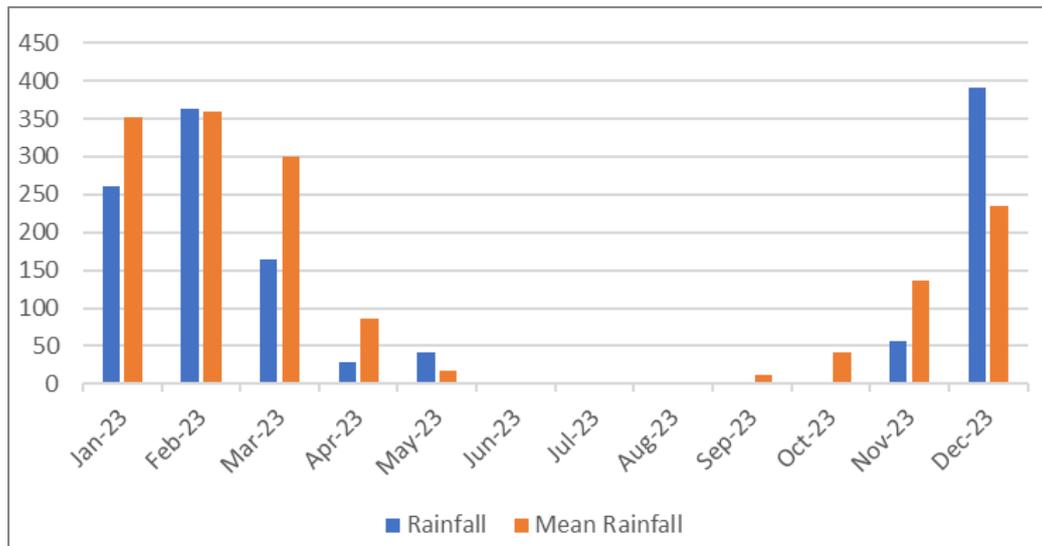


Figure 8 2023 Rainfall Chart

## 4.2. Land Area Type and Geology

The West Arnhem tenements are located within a small embayment in the northern edge of the Arnhem Land Plateau and comprises a gently sloping terrain of red-yellow coloured lateritic soils and sands, residual gravel pavements of vein quartz and calcrete concretions. Vegetation consists of tall open eucalypt forest and woodland plains with ground cover consisting of annual grasses. There is good vehicular access throughout the region due to the pre-existing mine infrastructure.

Rocky outcrop is poor within the area and most of what is known of the geology has been derived from previous drill programs and mapping in the old open pit area. The oldest rocks are a sequence of Early-Proterozoic metamorphosed sediments (semi-pelites) and amphibolites termed the Myra Falls Metamorphic; this unit hosts the Nabarlek Deposit.

The Myra Falls Metamorphics are faulted against the Nabarlek Granite which has been intersected in two holes beneath the Nabarlek Deposit. This granite also outcrops a few kilometres to the northeast within EL10176.

Middle Proterozoic shallow dipping Kombolgie Sandstone unconformably overlies the sequences described above and outcrops to the immediate north, west and south of the old mine site. Drilling has shown that up to 150m of sandstone can occur beneath the ground surface in areas covered by lateritic soils and sands.

Two major structural zones traverse across the Project area that potentially control mineralisation in the region. The Nabarlek Shear Zone controls the mineralisation at Nabarlek and the Quarry Fault Zone located 10km the east, form sub-parallel NNW–SSE trending structures through the Project.

## 4.3. Hydrology

The major watercourses in the project area are the Cooper Creek and the Birraduk Creek which both flow to the northwest. There are two smaller creeks, Kadjirikarmada and Buffalo, which run into Cooper Creek. In addition there are several smaller drainages.

Stream flows are variable throughout the region, reaching peak discharge levels during the wet season months of February and March. Many of these drainages have pools until late in the field season. The first wet season floods flush the creek and billabong systems of stagnant and naturally eutrophic waters that build up during the dry season.

The only known users of the surface water resources that originate or pass through the West Arnhem Project area are the local Aboriginal people. Their usage is entirely related to cultural and recreational activities such as swimming and fishing in flowing creeks/rivers in the region. There is no evidence that flowing water is likely to be contaminated.

#### 4.4. Flora and Fauna

The Company commissioned a Threatened Species Assessment of rare and endangered flora and fauna by COOE Pty Ltd in January 2023. The document, which considers the risk of the likelihood of work impacting on a threatened species is integrated into the Company's drilling procedures documentation - Appendix 7. The procedures are set out in a tabulated manner allowing field staff to use it as a checklist to meet the Company's environmental standards.

A number of internet databases including the Environmental Protection and Biodiversity Conservation (EPBC), Protected Matters Search Tool and the Northern Territory Natural Resource Management (NT NRM) Infonet have been utilised to assess the presence of potentially endangered species. The EPBC search tool identified seven threatened species that may occur within the area. These are:

- Red Goshawk – *Erythrotriorchis radiatus*;
- Gouldian Finch – *Erythrura gouldiae*;
- Partridge Pigeon (eastern) – *Geophaps smithii smithii*;
- Brush-tailed Rabbit-rat – *Conilurus penicillatus*;
- Northern Quoll – *Dasyurus hallucatus*;
- Arnhem Rock-rat – *Zyomys maini*; and
- Freshwater Sawfish – *Pristis microdon*.

The NT NRM Infonet database also identified threatened species that possibly inhabit the area. These include:

- Freshwater Sawfish – *Pristis microdon*;
- Arnhemland Egernia – *Egernia obiti*;
- Mertens' Water Monitor – *Varanus mertensi*;
- Yellow-spotted Monitor – *Varanus panoptes*;
- Emu – *Dromaius novaehollandiae*;
- Partridge Pigeon (eastern) – *Geophaps smithii smithii*;
- Red Goshawk – *Erythrotriorchis radiatus*;
- Australian Bustard – *Ardeotis australis*;
- Masked Owl – *Tyto novaehollandiae*;
- White-throated Grasswren – *Amytornis woodwardi*;
- Yellow Chat – *Epthianura crocea tunneyi*;
- Crested Shrike-tit – *Falcunculus frontatus whitei*;
- Gouldian Finch – *Erythrura gouldiae*;
- Northern Quoll – *Dasyurus hallucatus*;
- Northern Brush-tailed Phascogale – *Phascogale pirata*;
- Arnhem Leaf-nosed Bat – *Hipposideros inornata*; and

- Arnhem Rock-rat – *Zyzomys maini*.

The main vegetation is eucalypt woodland forest dominated by *Eucalyptus tetradonta*, *Eucalyptus Miniata*, *Corymbia bleeseri*, *Erythrophleum chlorostachys* and *Livistona humilis*, and other species common to these woodlands (Brock, 1997 and Clark et al., 1987). Lower areas tend to be dominated by *Melaleuca spp.* including *Melaleuca viridiflora* and *Melaleuca leucadendra*.

The Northern Territory Natural Resource Management (NT NRM) Infonet have been utilised to assess the presence of pest and potential pest animals that may occur within the area, including:

- Cane Toad – *Chaunus marinus*;
- Asian House Gecko – *Hemidactylus frenatus*;
- King Quail – *Excalfactoria chinensis*;
- Eurasian Tree Sparrow – *Passer montanus*;
- House Mouse – *Mus musculus*;
- Black Rat – *Rattus*;
- Dingo / Wild Dog – *Canis lupus*;
- Cat – *Felis catus*;
- Horse – *Equus caballus*;
- Pig – *Sus scrofa*;
- Swamp Buffalo – *Bubalus bubalis*;
- Cattle – *Bos indicus* / *Bos Taurus*; and
- Goat – *Capra hircus*.

Database searches through the Department of Natural Resources, Environment and the Arts (NRETA) and the Protected Matters Search Engine (Australian Department of the Environment and Water Resources) have been used to provide a full species list of flora and fauna and identify rare and endangered species in the area. The full report is provided in Appendix 2.

The assessment was undertaken to review the potential impacts on flora and fauna within the areas proposed for exploration activities during the 2023 Program. The areas have been specifically designed to avoid mapped significant vegetation and sandstone escarpments visible from aerial imagery. Areas were assessed via pre-clearance survey to confirm the presence or absence of environmental values including threatened species habitat and disturbance plans have been amended accordingly.

This assessment has concluded that (1) further investigation is required to better understand the risk to threatened species posed by exploration activities in the southern portion of Big Radon and Little Radon; and (2) proposed activities elsewhere on the lease do not pose a significant risk to threatened flora and fauna providing vegetation avoidance and impact mitigation measures are followed, as detailed in section 5.4.1.

A Threatened Species Assessment has been commissioned to encompass the extent of the 2024 work areas with receipt of this report expected in late February 2024.

## 4.5. Current Land Use

Current use of the land surrounding the site includes hunting, gathering and cultural use by the Traditional Owners. Access by non-traditional owners is limited almost exclusively to government officers and company employees and is controlled by a permit system.

## 4.6. Historical and Aboriginal Heritage Sites

Current NT legislation requires that all sacred, cultural and heritage sites are initially documented by the Traditional Owners and NLC anthropologists and archaeologists prior to exploration commencing.

An updated report from the AAPA was obtained for this project in July 2016 which is attached in Appendix 3. There are recorded sacred sites within the Nabarlek region, however these sites do not fall within the licence boundaries of this project. The Gabo Djang or Green Ant site are located immediately to the south-west of the Nabarlek Mining Lease (MLN692). This information has been utilised to set up 'No-Go Areas' within the DevEx mapping GIS database.

DevEx avoids all heritage sites when planning the location of proposed drillholes using the company's geospatial database of 'No-Go Areas'. If a proposed drillhole is in close proximity to one of these 'No-Go Areas', then the drillhole location is relocated away from the No-Go Area. This procedure is also applied when planning geochemical and ground-based geophysical surveys.

All proposed exploration activities are presented to Traditional Owners at a Work Program Clearance (WPC) meeting held early in the year between DevEx, Traditional Owners and representatives of the NLC, prior to exploration works commencing for that year.

A summary of proposed activities and locations relative to No-Go areas is presented under Section 3.2.

## 5. Environmental Management System

DevEx understands that responsible environmental management is essential to sustainable business success and is committed to environmental best practice. This commitment is documented in the company's *Sustainable Development Policy* given at the start of this document. Careful environmental planning and implementation of appropriate management measures will help minimise the potential environmental impacts and will enhance successful rehabilitation of disturbed areas.

DevEx's Environmental Management System (EMS) for all exploration activities are provided in this section. This EMS has been structured to comply with the requirements of the international EMS standard ISO 14001.

DevEx will comply with the recommendations outlined in the 2023 Annual Environmental Audit of the Nabarlek mineral lease and West Arnhem Joint Venture Document.

### 5.1. Environmental Policy and Responsibilities

DevEx's commitment to the environment is defined in its *Environment Policy*, which is shown on the next page.

DevEx Resources is committed to continuous improvement in our business operations to protect the environment, in accordance with the requirements of the law, our clients, and expectations of the general community.

DevEx Resources understands that responsible environmental management is essential to sustainable business success and is committed to a high standard of environmental management throughout its operations.

To achieve this DevEx will:

- Comply with all environmental laws and regulations as a minimum, with best practice environmental management our target;
- Ensure appropriate training for all employees and contractors to enable them to fulfil their environmental responsibilities;
- Communicate with relevant government agencies and communities on environmental issues and develop open relationships;
- Establish programs to control and manage environmental risks;
- Implement strategies to minimise and manage hazards; and
- Establish measurable environmental objectives to monitor and continuously improve our environmental performance.

## 5.2. Statutory and Non-Statutory Requirements

### 5.2.1. Statutory Requirements

The following dot points list all relevant legislation, codes and other statutory obligations related to the Project area. In certain circumstances, specifics of how it relates to the operation are also provided. DevEx will comply with all permits and conditions pertaining to the Project area.

- *Aboriginal Land Rights (NT) Act (Commonwealth);*  
Permission to explore over Aboriginal Freehold land is gained via Exploration Agreements with the relevant Traditional owners under *ALRA*. The Joint Venture partners have an exploration agreement with the Northern Land Council (NLC). The project area lies within the Arnhem Land Aboriginal Reserve. All personnel entering the project area will be required to obtain the appropriate Northern Land Council (NLC) permit.
- *Mining Management Act (NT) and Regulations;*  
Operational aspects of the West Arnhem Project will be regulated under the *MMA* through the annual submission of an MMP, and via the conditions of Authorisation. This MMP is being prepared and submitted as required under this Act. In addition this Act requires the calculation of financial security based on the actual cost of rehabilitation, (see Appendix 4).
- *Mineral Titles Act (NT) and Regulations;*  
Exploration operations will be conducted on the lease subject to the conditions of the *Mineral Titles Act*.
- *Environmental Protection (Alligator Rivers Region) Act 1978;*
- *Radiation Safety and Control Act (NT) and Regulations;*  
Mining operations are specifically excluded from the *RSCA*, however DevEx endeavours to comply with the requirements of the Act wherever possible in the interests of good practice.
- *Radioactive Ores and Concentrates (Packaging and Transport) Act (NT);*  
Under the *ROCA*, radioactive material may require a licence from NT Worksafe for transport off the Project area. Licences for sample transport will be sought as required.
- *Atomic Energy Act (Commonwealth);*
- *Bushfires Act (NT);*
- *Environmental Assessment Act (NT);*
- *Environmental Offences and Penalties Act (NT);*
- *Environment Protection and Biodiversity Conservation Act (Commonwealth);*
- *Heritage Conservation Act (NT);*
- *Native Title Act (NT);*
- *Northern Territory Aboriginal Sacred Sites Act (NT);*
- *Public Health Act (Commonwealth);*
- *Soil Conservation and Land Utilisation Act (Commonwealth);*
- *Territory Parks and Wildlife Conservation Act (NT) and By-Laws;*
- *Waste Management and Pollution Control Act (NT);*
- *Water Act (NT);*
- *Weeds Management Act (NT);*

- *Workplace Health and Safety Act (NT)*;
- Radiation Protection Series G-1 (ARPANSA, Commonwealth);
- Radiation Protection Series G-2 (ARPANSA, Commonwealth);
- Radiation Protection Series C-1 (ARPANSA, Commonwealth);
- *Code of Practice on the Safe Transport of Radioactive Materials (ARPANSA, Commonwealth)*;

DevEx have prepared a Radiation and Radioactive Waste Management Plan for all their exploration activities. This plan and its associated procedures ensure compliance with both these codes of practice.

### **5.2.2. Non-Statutory Requirements**

DevEx have entered into agreements with Traditional Owners of the land encompassing the West Arnhem Project. All persons working in Aboriginal Freehold land will obtain a permit from the NLC prior to entry.

## **5.3. Induction and Training**

Each staff member and contractor will be trained with the relevant Nabarlek Exploration Induction before they can commence work on site. A tailored Induction is presented to contract staff in line with their practices and responsibilities. As standards and practices change, staff will be made aware and trained in new practices.

The Nabarlek Exploration Induction outlines environmental & cultural issues relevant to exploration activities and items of particular importance covered by the induction include:

- Cultural awareness;
- Weed Management;
- Vegetation and Land Clearance;
- Waste Management;
- Hydrocarbon/Hazardous Materials and Radiation Management; and
- Fire Management

Records will be kept of all staff and contractors that undertake the induction.

## **5.4. Identification of Environmental Aspects and Impacts**

The key environmental aspects considered to be important in the assessment of environmental impacts for the West Arnhem exploration activities are outlined in Appendix 10. Environmental impacts were identified from the results of environmental audits, workplace inspections, risk assessment and from a working knowledge of day-to-day operational activities.

The risk rating was assigned by conducting a small group session and assessing the magnitude or severity of environmental impacts using the DevEx Risk Matrix for each environmental aspect and assigning a score. Mitigating factors were taken into consideration to assign a Mitigated Risk Rating.

The environmental aspects and impacts detailed in Appendix 10 require appropriate management to ensure that the impact on the environment as a result of exploration activities on the West Arnhem tenements are minimised. The following section provides details of those management principles.

#### **5.4.1. Vegetation Management**

The principle objective for managing the future disturbance to vegetation is to minimise the area of disturbance, avoid known priority flora locations and to ensure effective progressive rehabilitation.

In planning of activities DevEx takes into consideration the NT Land Clearing Guidelines with respect to sites of high value native/significant vegetation. In some isolated cases these guidelines cannot be met, however, in these cases long-term impacts to significant and sensitive vegetation will be mitigated through DevEx's exploration and rehabilitation works.

Prior to clearing sites, personnel are trained in identification of potential fauna breeding sites, large trees and hollow stags as per DevEx Preclearing procedure.

#### **5.4.2. Fauna Management**

The objective of fauna management is to minimise disturbance to native fauna from exploration activities. Fauna management will include:

- Minimising disturbance to vegetation and potential fauna habitats;
- Employing management measures to minimise impact on watercourses;
- Educating people on the importance of not killing or disturbing native wildlife;
- Limiting vehicle speeds to reduce the potential for road kills;
- Construction of drill sumps with an egress to allow fauna to ascend out of the sump. Drill sumps are checked for presence of trapped fauna, as detailed in the post drilling procedure;
- Capping of open drill holes;
- Managing refuse to prevent attraction to feral animals; and
- Culling feral animals in consultation with traditional owners. If culling of feral animals has been required, DevEx has contacted the appropriate Aboriginal Ranger Group to conduct any culling activities.

Please refer to Appendix 7 for further details on fauna management procedures.

#### **5.4.3. Weed Management**

Ongoing active management is required to prevent the potential spread of weeds during exploration programs. Weed management for exploration activities during the field seasons includes:

- Training of key personnel in weed awareness and control procedures;
- The requirement for wash down of heavy equipment and inspection for weed seed prior to mobilisation to site;
- Pre-planning of drill track and pad installation to avoid known weed infestation areas;

- The usage of a weed wash down station established at the edge of the airstrip apron to help reduce the spread of weeds off site as a result of vehicle traffic. All weed seed is captured in a bund and periodically treated with chemicals and/or fire;
- The requirement for all heavy vehicles to be washed down at the weed wash down station and inspected for weed seed prior to de-mobilising from site. A clearance certificate system is operated to ensure compliance with this requirement;
- The requirement for the wash down of all light vehicles each time before leaving site to travel to Jabiru, Oenpelli or Darwin and;
- Chemical spraying of roads around lease and areas used for exploration activities with known weed occurrences within the area following cessation of the work season.

In addition to the threat of weed transport into West Arnhem by animals and vehicles in transit (poachers and normal access by traditional owners) weeds and non-native grasses are common throughout MLN962 lease including pasture species in the form of Mission Grass (*Pennistemon pedicellatum*) and to a lesser extent weeds such as Para Grass (*Urochloa mutica*) and Grader Grass (*Themeda quadrivalvis*). The risk of spread of these grasses into the surrounding West Arnhem region requires close management and monitoring. Both exploration vehicles, animals and river ways are likely transport mechanisms. Gamba Grass is currently a priority eradication species in the Northern Territory and DevEx is monitoring for this weed species also.

DevEx actively engages the Weed Management Branch Department of Environment and Natural Resources for advice. In September 2017 DevEx met officers from the Weed Management Branch and DEMED Aboriginal Group on site at Nabarlek to discuss weed control measures. The outcome of this meeting and subsequent discussions included:

- i) Weed Management Branch is primarily interested in weed management along access roads, tracks and creek crossings where vehicles will potentially spread seeds further away from source.
- ii) DevEx to liaise with local Ranger Groups on weed hotspots where cool burns are required
- iii) DevEx to engage local Ranger Groups to carry out roadside weed spraying of known hotspots within the ELs
- iv) DevEx to be particularly vigilant for the occurrences of Gamba Grass within the EL areas and immediately eradicate any occurrences.
- v) DevEx to liaise with Weed Management Branch on suitable chemicals to target weeds, and weed mapping techniques.

Previous weed mapping in the region is not documented for West Arnhem. A weed occurrence register will be implemented for the 2024 season.

A cool burn of access tracks to the U40 and U40 South region by Traditional Owners took place in early June 2019.

#### **5.4.4. Cultural Heritage Management**

The objective of cultural and heritage management measures is to minimise the impacts to identified cultural and heritage sites. During the planning of exploration programs, the location of drillholes and work areas is reviewed in relation to these “No-Go” zones. In addition, Work Area Clearance meetings are held at the beginning of each year with TOs and representatives of the NLC to get approval for the proposed drilling program scheduled for the dry season.

Additional management techniques to minimise disturbance to cultural and heritage sites include:

- Making staff and contractors aware during the West Arnhem field induction that archaeological sites are protected under the *Heritage Conservation Act (NT)* and that any

damage or destruction to sites may result in prosecution by the Northern Territory government;

- Educating staff and contractors on the existence of the archaeological sites and the corresponding “No-Go” zones during the West Arnhem field induction;
- Reporting any unauthorised entry into these “No-Go” zones to the Senior Site Geologist or Environmental Advisor;
- Ceasing work in the area if unauthorised entry occurs into a “No-Go” zones;
- Stopping work if a previously unidentified heritage site is found or suspected during the course of exploration work;
- Using the “No-Go” zones on the company’s GIS mapping system to ensure that proposed access tracks do not go through these zones; and
- Driving slowly past sandstone escarpments greater than 5 metres in height to minimise damage to aboriginal heritage sites with significant aboriginal paintings.

#### **5.4.5. Noise and Air Quality Management**

All drilling contractors and DevEx staff in close proximity to the drilling rig will wear the appropriate hearing protection and dust safety equipment.

Noise generated from drill rigs and associated vehicles may result in negligible impacts to fauna in the immediate drill area. As there are no residences or townships close to the proposed exploration operations, no noise impacts will be experienced by members of the public.

The objective for dust control and management is to ensure that dust generated from exploration activities does not cause contamination of water and soil or impact on vegetation or fauna. Management measures to ensure environmental dust emissions are minimised include:

- Dust extraction equipment to suppress dust from drill rigs;
- Limiting vehicle speeds whilst driving on site.

#### **5.4.6. Fire Management**

Uncontrolled wildfires are an annual feature of the region, particularly from mid to late dry season. The Nabarlek region has been subject to wildfires in the past with adverse effect on the native vegetation and fauna, particularly in areas of high weed infestation.

To minimise the opportunity for a fire to be accidentally lit as a result of exploration activities controlled ‘cool burns’ are undertaken in the late wet to early dry season. These are conducted in consultation with Traditional Owners, DEMED and Bushfires NT.

Temporary campsites will check for, and observe any, fire bans before lighting campfires. Campfire size must be kept small and manageable with a minimum of 1m radial clearing around the fire. No campfires are to be left unattended. Fire extinguishers must be readily available and located proximal to portable generators and inside all vehicles at the campsite.

Fire management measures include:

- Provision of firefighting equipment at the camp and in vehicles, including water trailers, vehicle mounted firefighting units, fire extinguishers and firefighting nap-sacks.
- Restrictions on where hot-work can be conducted;
- Training of employees in fire prevention and basic fire fighting;

- Fire breaks maintained around the perimeter of the site;
- Induction for all personnel in the use of the water trailer; and
- Provision of vehicle mounted firefighting units for use during loader operations.

#### **5.4.7. Ground Water Management**

The objective for ground water management is to prevent contamination and drawdown of aquifers. DevEx believes that it is unlikely that confined aquifers will be intersected as any future drill targets will be at shallow depths.

Any groundwater that comes to the surface as a result of exploration drilling, particularly RC drilling, will be contained in sumps and left to evaporate. The sumps used to contain groundwater are not lined. The sumps may contain groundwater and any mud or rock material that is brought to the surface during drilling operations. After allowing the contained materials to dry, the sediment is buried during sump rehabilitation by backfilling with stockpiled material during the drill site rehabilitation.

Pollution caused by spillages of hydrocarbons or from radioactive material has the potential to impact groundwater. Measures that will be implemented to ensure that spillages of hydrocarbons and other hazardous materials are minimised include:

- Ensuring that there is constant supervision of RC rigs at all times;
- Provision of a spill kit at the drilling rig; and
- Ensuring that any spills are cleaned up and the contaminated area is rehabilitated. Contaminated soils will be dug up, with the contaminated material double bagged, sealed and buried below 300mm of soil at the site rubbish tip.
- Drilling fluid additives used will be non-toxic, relevant SDS forms will be provided by the drill contractor and assessed prior to use, ensuring no additives will be used that could leave residual toxicity

Depth of water table will be recorded in drilling logs. Any deep diamond holes with demonstrating high water flow which would likely either cause downward cross contamination of deeper ground water aquifers, or upward cross contamination of the deeper ground water into the shallow aquifer, will be grouted at depths below the upper aquifer and comply with advice contained within the Construction and Rehabilitation of Exploration Drill Sites (nt.gov.au).

#### **5.4.8. Surface Water Management**

The main objective for surface water management is to ensure that exploration activities do not lead to contaminants entering water courses and being carried off site.

- Surface water management measures include:
  - Ensuring all pumps and fuel/hydrocarbon containers are placed on self-bunding pallets during all drilling operations;
- Excavating sumps for each drillhole to contain any drilling fluids and/or groundwater.
- Ensuring spillages are cleaned up and rehabilitated;
- Reducing dust emissions from drilling rigs and vehicles; and

- Best practice drill rig pad management, including topsoil and vegetation management and construction of small bunds to divert surface runoff around disturbed areas and access tracks.

The other objective of surface water management is to minimise erosion of surface water bodies. Management techniques include:

- The minimisation of vehicle crossings over drainage lines where existing crossings do not already exist; and
- Rehabilitation of access tracks crossing drainage lines after significant/erosive flood flow.

DevEx submitted an application in January 2020 for the right to extract surface water at a rate of 0.5ML per year (Northern Territory Of Australia Approved Form 11 (25/01/2011) Application For Grant Or Renewal Of Licence To Take Or Use Surface Water Pursuant to section 45 of the Water Act). This was granted in June 2020.

#### **5.4.9. Waste Management**

There is a range of waste generated from exploration activities. Each waste stream has specific management techniques which are described below.

##### **5.4.9.1 Domestic Waste**

Domestic waste is produced at both the Nabarlek camp and the exploration sites within the West Arnhem area.

The types of camp wastes produced include:

- Organic debris (i.e. food scraps); and
- General refuse including scrap metal, cardboard and plastics.

The objective of waste management in the camp is to minimise the amount of waste that needs to be disposed of in land fill. DevEx have implemented a domestic waste segregation system where all waste that can be recycled is transported back to Darwin at the end of the field season and all domestic refuse is burned in a pit on site. Domestic waste generated from temporary campsites will also comply with this management plan.

Recyclable wastes include:

- Plastics;
- Cans;
- Glass; and
- Scrap Metals.

Non-recyclable wastes such as aerosols and batteries are placed in separate containers at the camp and are also taken back to Darwin at the end of the field season.

Domestic refuse such as food scraps, organic debris and burnable rubbish (paper and cardboard) is transported to the domestic refuse pit. Each time that domestic refuse is deposited in the pit it is burned. The pit has been fenced to prevent access by larger feral animals and sloped to allow egress of any trapped native animals.

##### **5.4.9.2. Exploration Waste**

The types of exploration wastes produced include:

- Inert waste such as rubble from excavations;
- Hazardous wastes such as waste oils;
- General refuse including scrap metal, cardboard and plastics; and
- Sludges, sediments and drill cuttings brought to the surface during drilling, some of which may contain small quantities of naturally occurring radioactive material. At this stage of the drilling, it is not known whether the drill cuttings/sediments/sludges contain any radioactivity and therefore this exploration waste cannot be distinguished from the radioactive waste.

The objective of waste management at the exploration sites is to minimise the potential for soil and water contamination from the various waste streams. Management includes:

- Any sludges, sediments and drill cuttings brought to the surface during drilling are contained within the drill sump, allowed to dry and buried in the sump upon completion;
- All hydrocarbons and hazardous materials are stored and handled to ensure that spillages are minimised and if they do occur are cleaned up and the area rehabilitated; and
- All domestic and hard wastes are returned each night to the camp for appropriate segregation and management.

Drilling fluid additives used will be non-toxic and SDS forms provided by drilling contractor to be assessed before used, ensuring no additives will be used that could leave residual toxicity.

#### **5.4.9.3. Radioactive Waste**

Uranium exploration activities can generate very low quantities of radioactive waste with drilling being the only activity that generates any radioactive waste materials. Possible radioactive drilling waste streams include:

##### **Solid Waste**

- Drill cuttings from mineralised zones;
- Miscellaneous waste material that has contacted mineralised material (e.g. gloves, rags, etc.); and
- Radioactive contaminated drilling equipment.

##### **Liquid Wastes**

- Spillages of groundwater containing radioactive materials intersected during drilling; and
- Spillages of water used for drilling that intersect mineralised zones.

##### **Airborne Wastes**

- Airborne dusts generated during percussion drilling.

DevEx has a Radiation and Radioactive Waste Management Plan (RRWMP) for the company's exploration activities (see Appendix 5). The objective of this plan is to minimise these various radioactive waste streams from entering the environment and causing contamination.

Management measures are detailed in the RRWMP.

#### **5.4.9.4. Hydrocarbon Waste**

It is expected that small quantities of hydrocarbons, including diesel, oils and lubricants will be used during drilling and other exploration activities and these will be stored in the securely fenced bunded compound of the Mineral Lease (MLN962).

Management measures to ensure that spillages of hydrocarbons and other hazardous materials are minimised during storage and transportation include:

- The storage of hazardous materials and hydrocarbons in a securely fenced bunded area or in self-bunded tanks/containers;
- Transportation in accordance with applicable regulations and codes (if required);
- Firefighting equipment in the near vicinity of the storage area;
- Cleaning up of any spills and the remediation of contaminated areas; and
- Disposal of unused hazardous waste substances in a manner that minimises any potential impacts, including disposal to registered disposal sites where required.

Management measures to ensure that spillages of hydrocarbons and other hazardous materials are minimised during drilling include:

- Ensuring all pumps and fuel/hydrocarbon containers are placed on self bunding pallets during all drilling operations;
- Ensuring that there is constant supervision of fuelling of the rig at all times;
- Provision of a spill kit at the drilling rig;
- Ensuring that any spills are cleaned up and the contaminated area is rehabilitated;
- The construction of sumps at drill sites to contain any hydrocarbon contaminated water from drilling; and
- Placing plastic sheeting under drill rigs while operational to capture any hydrocarbon spills.

Management measures to ensure that spillages of hydrocarbons and other hazardous materials are minimised at the temporary campsite include:

- Storing all hydrocarbons within a plastic bunded spill enclosure;
- Provision of a spill kit at the campsite;
- Firefighting equipment in the vicinity of the storage area; and
- Refuelling using nozzle attachments on jerry cans.

Contaminated soils will be dug up, with the contaminated material double bagged, sealed and buried below 300mm of soil at the site rubbish tip.

Drilling fluid additives used will be non-toxic, relevant SDS forms will be provided by the drill contractor and assessed prior to use, ensuring no additives will be used that could leave residual toxicity.

## 5.5. Environmental Review, Inspections and Monitoring

On 20 October 2017, Departmental Officers and representatives from the Northern Land Council and Supervising Scientist Branch inspected areas on the Nabarlek Uranium Mine including the Exploration Camp which services the Nabarlek and West Arnhem Projects. During the visit it was observed that activities addressing the 2016 DITT instruction (MDOC2016/09963: Instruction Letter Inspection Report September 2016 – UEL Nabarlek – 0435-010731-01) has been completed or was in the process of completion, this was documented in the 2017 Site Inspection Report (MDOC2017/010192: Nabarlek Inspection Report – 20 October 2017). DevEx confirmed completion of outstanding items in a letter to DITT on 1<sup>st</sup> February 2018 and received acceptance of completion of all outstanding items from the DITT on the 25 February 2018. This audit was primarily concerned with Nabarlek MMP, but sections of the Camp also relate to the West Arnhem MMP including the clean up of hydrocarbons and hazardous materials at the exploration camp.

No drilling or ground disturbing activities took place in 2017.

Photo monitoring of the 2015 RC/Diamond drilling commenced in 2015 and the rehabilitation is recorded in Appendix 1. Photo monitoring of the 2019 RC/Diamond drilling commenced in 2019, but the 12 and 24 month photography has not been followed up due to COVID-19 travel and access restrictions. The follow-up of this photography has however been made a priority and will be completed in the current field season.

An Environmental Review was planned to take place after the 2019 Drilling Activities, in early 2020, however this has been postponed due to COVID-19 related travel restrictions. The Review was planned to address the following:

1. Weed Mapping of all access tracks and drill pads for both planned for 2019 drilling activities.
2. Standards and Management Plan for Noise and Dust Generated by Drilling Operations – Drill Rigs to site are required to be fitted for Dust Suppression.
3. Erosion and sediment control – Drill Pads (post 2015) will be inspected for signs of erosion
4. All Drill Pads will be measured with a scintillometer and photographed prior to drilling commencing
5. All staff and drilling contractors will be required to sign off on reading the Radiation and Radioactive Waste Management Plan prior to drilling commencing.
6. The Company's Radiation Safety Officer will be present at commencement of the Drilling Operation to ensure compliance with the Radiation and Radioactive Waste Management Plan.

The 2022 Annual Environmental Audit of the Nabarlek mineral lease and West Arnhem Joint Venture took place on the 23-24<sup>th</sup> of August 2022. The audit team was comprised of personnel from the Department of Climate Change, Energy the Environment and Water (DCCEEW), the Northern Land Council(NLC) and the Northern Territory Department of Industry, Tourism and Trade (DITT).

The Audit assessed DevEx's performance against the commitments made in the 2021 MMP, and pre and post drilling procedures(DEVEX-DRL-SWP Pre Drilling and Post Drilling). These plans and procedures are mirrored in the MMP for the West Arnhem Joint Venture Project. Inspections were primarily conducted on Mineral Lease 962 and EL10176. The audit tested 29 commitments, with no non conformances being identified. The recommendations from the 2022 Environmental audit have been implemented for the 2023 MMP and subsequent exploration program.

The 2023 Annual Stakeholder Environmental Audit of DevEx Resources Limited's West Arnhem Exploration Joint Venture Project was undertaken over two days at Mineral Lease 962, Exploration

Lease 10176 and the DevEx Nabarlek exploration camp on 31 August and 01 September 2023. The audit team comprised of personnel from the Office of the Supervising Scientist and the Northern Territory Department of Industry, Tourism and Trade.

The scope of the environmental audit was to assess DevEx's exploration drilling activities against commitments made in the DevEx 2023 West Arnhem JV Mining Management Plan, Pre- and Post-drilling Procedures, and Photo Monitoring Procedure.

The audit verified a total of 31 commitments. In summary, DevEx were compliant with their environmental management commitments made in their operating Mining Management Plan, with the exception of one Category 2 non-conformance and six conditional findings.

The Category 2 non-conformance related to missing documentary evidence of personnel using the vehicle wash down bay.

The audit team made recommendations for updates to be incorporated into the next Mining Management Plan submission, where current practices did not align with written procedures. Recommendations regarding improved practices for spill capture and fauna entry prevention to drying sumps were also made.

The audit confirmed that all key findings from the 2022 audit had been completed.

DevEx received the draft audit report for 2023 and is currently reviewing all key findings from the 2023 audit and readjusting its managing procedures to meet and improve all recommendations.

All DevEx documents are subject to document control to prevent unauthorised alteration and to ensure that all employees have access to and can easily identify the most up to date versions and enable effective management of reviews. A document register ensures the effective management of documents. These include, but are not limited to, management plans and procedures, environmental policies, procedures and forms, monitoring records and data, incident reports and investigations, inspections and audits.

Documents are kept on site at Nabarlek. However regular break-ins have seen vandalism of the office facilities, including destruction of documentation. Documents have been relocated to the lockable storage containers in the hope to protect these documents and ensure availability.

## **5.6. Environmental Performance**

### **5.6.1. Objectives and Targets**

Environmental performance objectives involve the measurement of rehabilitation of disturbed sites and the protection from invasive weed species. The Company regularly monitors 1. progress of rehabilitation and 2. Occurrences of foreign weed species and fauna.

DevEx, through its *Sustainable Development Policy and Environment Policy*, is committed to achieving best practice in environmental and safety management. To track its performance in these areas DevEx has developed a number of performance indicators with associated targets that will be used in 2024. The objectives have been selected to ensure continual improvement in environmental management of exploration activities and safety performance.

Table 5 Environmental and Safety Performance Indicators for 2023-2024

| Performance Indicator                              | Current Measure | Target |
|--|-----------------|--------|
| <b>SAFETY</b>                                      |                 |        |
| Number to Lost Time Injuries per year              | 0               | 0      |
| Number of Medical Treated Injuries per year        | 1               | 0      |
| Number of First Aid Treatments per year            | 0               | 0      |
| Number of incidents per month                      | 0               | 0      |
| Percentage of drill rigs inspected                 | 100             | 100    |
| <b>ENVIRONMENTAL</b>                               |                 |        |
| Number of reportable environmental incidents       | 0               | 0      |
| Number of environmental incidents per month        | 0               | 0      |
| Number of native fauna deaths from operations      | 0               | 0      |
| Number of un-authorized environmental disturbances | 0               | 0      |

DevEx has developed performance objectives for both its exploration activities and the rehabilitation of legacy uranium mining areas. The objectives have been selected to ensure continual improvement in its environmental management of exploration activities. Specific objectives are given in Table 6.

Table 6 DevEx 2024 Performance Objectives

| No | Overall Objective                          | Target for 2023   | When          |
|----|--|---|---------------|
| 1  | No reportable environmental incidents      | Zero  | Dec 2024      |
| 2  | Update and submit MMP                      | Annually  | February 2024 |
| 3  | Rehabilitate exploration disturbance areas | Continue photo monitoring of 2014-23 rehabilitated drillholes and rehabilitate any new disturbances | Dec 2024      |

### 5.6.2. Performance Reporting

DevEx will track safety and environmental performance through key performance indicators (see section 6) and report these in subsequent Mining Management Plans.

Photo monitoring will be undertaken in conjunction with exploration activities to track potential impacts to vegetation and measure rehabilitation success (see section 6 for more detail).

## 5.7 Emergency Procedures and Incident Reporting

DevEx requires that environmental incidents, near misses and hazards are reported to a supervisor immediately. Specific environmental incidents that require reporting include:

- Hydrocarbon spillage;
- Animal injuries or deaths
- Wildfire;
- Cyclone or intense rain event;
- Unplanned vegetation disturbances;
- Breaches of the environmental policies or procedures; or
- Other unforeseen events.

Incidents will be recorded on an Environmental Incident Register. As per section Section 29 of the *Mining Management Act*, environmental incidents will be reported to the Mining Compliance division within the Department of Primary Industry and Resources on the Notification of an Environmental Incident form.

Emergency procedures have been developed to ensure appropriate management of potential incidents. Notifiable incidents include those outlined by NT Worksafe guidelines, including serious injuries, dangerous incidents or death has occurred (WHS Act 2011). DevEx's emergency procedures are provided in Appendix 6.

## 6. Exploration Rehabilitation

The objective of exploration rehabilitation is to reinstate the site to as near as original condition as possible and to leave it in a state where revegetation can occur after the completion of exploration activities. Rehabilitation activities for exploration work programs are summarised in Table 7 and detailed in the *Post-Drilling Procedure* (see Drilling Procedures in Appendix 7).

Topsoil management is critical to rehabilitation success. Proposed measures applicable to preservation of topsoil include:

- Any topsoil or vegetative material removed during the clearing process will be stockpiled for use during rehabilitation;
- Topsoil material will be stripped and stockpiled separately to any other soils; and
- Topsoil stockpiles will be laid out in strips no more than 1 metre in height as close as possible to where they are to be used in future rehabilitation work. Stockpiles will be located away from work areas so that they are not mistakenly driven over.

At the completion of exploration rehabilitation, the land will be left to naturally regenerate. If monitoring (see Section 6.1) shows natural revegetation to be ineffective then seeding with provenance species and/or weed control measures will be undertaken.

Existing tracks are closed off for the wet season, prior to DevEx leaving site. PVC piping and associated earthworks over creek crossings are removed and erosion control measures, such as spur drains or contour banks, are placed at suitable regular intervals. Natural drainage lines are checked to ensure that they are not blocked and any obstructions are removed. Any windrows that have developed along the tracks are flattened to prevent preferential flow paths.

All rehabilitation works will be recorded on the West Arnhem Drillhole Rehabilitation Register (Appendix 1) which will be implemented by DevEx as drilling works are initiated. Given the significant size of the proposed exploration program, progressive rehabilitation has been implemented throughout the season at the earliest practicable opportunity, such that all rehabilitation is completed prior to the onset of the wet season. Prospects which are topographically low lying will be prioritised.

### 6.1. Photo Monitoring

Photo monitoring of all drillhole sites before and after drilling is undertaken to allow comparison of the rehabilitated site to the original undisturbed site. A Drillhole Photo Monitoring Procedure (Appendix 8) has been developed to ensure consistency for all drill site photo monitoring, with a photo-monitoring station established for each drillhole enabling replication at defined time intervals after rehabilitation. Information associated with each photo is recorded on a Pre-Drilling Data Form and Post-Drilling Data Form.

### 6.2. Current Rehabilitation Status

All disturbed areas resulting from exploration work programs were rehabilitated at the completion of each field season

Table 7 Rehabilitation Activities for Exploration Work Programmes

| Disturbance   | Rehabilitation Activities  | Schedule (Timing)                      | Closure Objectives   | Monitoring   |
|---------------|--|--|--|--|
| Drill holes   | <p>Plug each drillhole below the surface and backfill to the surface.</p> <p>Remove any mineralised uranium material from the drill hole site.</p>   | By the End of the Field Season         | <p>All drillholes plugged and safe prior to the end of the field season. Temporary capping of drill holes following completion of drilling.</p> <p>Ensure revegetation is progressing and weeds have not established at the 12 month inspection.</p>   | <p>Photographs taken before drilling, post-rehabilitation and at the 12 month inspection.</p> <p>Enter rehabilitation data onto Nabarlek Drillhole Rehabilitation Register.</p> <p>Follow up any sites which require further work.</p> |
| Drill sumps   | <p>Sample bags emptied into the sump.</p> <p>Empty sample bags burnt at the Nabarlek domestic refuse pit.</p> <p>Drill cuttings placed into the drill sump.</p> <p>Backfilled with excavated material.</p> <p>Recontoured to the original contour.</p> <p>Respread with stored topsoil.</p>  | At completion of drill Programme       | <p>All sumps backfilled prior to the end of the field season.</p> <p>Ensure revegetation is progressing and weeds have not established at the 12 month inspection.</p>   | <p>Photographs taken before drilling, post-rehabilitation and at the 12 month inspection.</p> <p>Enter rehabilitation data onto Nabarlek Drillhole Rehabilitation Register.</p> <p>Follow up any sites which require further work.</p> |
| Drill pads    | <p>All rubbish removed, including sample bags, wooden pegs, etc</p> <p>Recontoured to original contour and compacted areas scarified.</p> <p>Stockpiled topsoil respread over the site.</p> <p>Cleared vegetation spread across the site.</p> <p>Final radiation reading taken and recorded on <i>Post-Drilling Data Form</i>.</p> | At completion of field season          | <p>All drill pads clean and recontoured.</p> <p>Ensure revegetation is progressing and weeds have not established at the 12 month inspection.</p> <p>Ensure there is no radiological contamination of the surface soils by comparing the final radiation reading with the initial radiation reading at each work site.</p> | <p>Photographs taken before drilling, post-rehabilitation and at the 12 month inspection.</p> <p>Enter rehabilitation data onto Nabarlek Drillhole Rehabilitation Register.</p> <p>Follow up any sites which require further work.</p> |
| Access tracks | <p>Any compacted areas to be ripped.</p> <p>Any windrows to be flattened to prevent preferential flow paths</p>  | At the completion of the field season. | New tracks where exploration was unsuccessful are rehabilitated prior to the end of the field season.  | Follow up any sites which require further work.  |

| Disturbance | Rehabilitation Activities  | Schedule (Timing) | Closure Objectives   | Monitoring |
|-------------|--|-------------------|--|------------|
|             | <p>developing and leading to erosion.</p> <p>PVC piping and associated earthworks over creek crossings removed and erosion control measures (e.g. spur drains or contour banks) placed at suitable regular intervals.</p> <p>Check that any natural drainage lines are not blocked and any obstructions from creek crossings are removed.</p> <p>Stockpiled topsoil respread over the track.</p> <p>Any cleared vegetation to be respread.</p> |                   | <p>Where exploration was successful and exploration activities will continue the following year, tracks are retained. To mitigate the risk of erosion and the loss of knowledge with time DevEx will adopt the following practices</p> <ol style="list-style-type: none"> <li>1. Similar to the Drill Hole Rehabilitation Register, DevEx will create and Exploration Track Register which identifies tracks established during the year by name.</li> <li>2. The name of these tracks will be recorded as a GIS file for reference.</li> <li>3. Rehabilitated track will be recorded in a similar way to the Drill Hole Rehabilitation Register</li> <li>4. Tracks not rehabilitated on account of them being required for the following year will be noted on the Track Rehabilitation Register. To minimise the risk of soil erosion by implementing erosion control techniques, such as erosion control structures including diversion banks or whoa-boys, placed at suitable intervals.</li> </ol> <p>Ensure revegetation is progressing and weeds have not established at the 12 month inspection.</p> |            |

### 6.3. Exploration Rehabilitation Register

DevEx’s rehabilitation register related directly to drill holes and associated activities and is referred to within this document and provided in Appendix 1.

## 6.4. Costing of Closure Activities

Rehabilitation costs for the exploration work proposed for the 2024 field season (as detailed in Section 3.2) have been calculated using the DITT standard format. The completed form has been provided in Appendix 4 and the summary page is provided in Table 8 (redacted from public version).

Table 8 Summary of 2024 DITT Financial Security Calculation for MMP comprising EL10176, EL23700 & EL24371

## 7. References

Brock, J., 1997, Native Plants of Northern Australia, Reed.

Clark, M., Traynor, S. and Dunlop, A., 1987, *Plants of the Tropical Woodland*, Conservation Commission of the Northern Territory. Government Printer of the Northern Territory.

## Appendix 1

### Drillhole Rehabilitation Register

## **Appendix 2**

### EPBC & NRM Infonet Database Searches

## Appendix 3

### AAPA Sacred Site Report & Map

## Appendix 4

### 2021 Security Calculation Form

## **Appendix 5**

### Radiation & Radioactive Waste Management Plan

## **Appendix 6**

### Emergency Procedures

## **Appendix 7**

### **Drilling Procedures**

## Appendix 8

### Drillhole Photo Monitoring Procedure

## **Appendix 9**

### Threatened Species Assessment

## Appendix 10

### Environmental Risk Register and Risk Rating Matrix