

## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4328/1989/10	Licence file number:	DER2013/001044-1
Licence holder:	MARBL Lithium Operations Pty Ltd		
Trading as:	MARBL Lithium Operations Pty Ltd		
ACN:	637 077 608		
Registered address:	20 Walters Drive, Osborne Park, WA 6017		
Reporting period:	01/07/2024 to 30/06/2025		

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

Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
Category 5: Processing or Beneficiation of metallic or non-metallic ore Assessed capacity – 8,750,000 tonnes	Wodgina Processing (Lithium Ore Processed): 3,839,830 Wet Metric Tonnes (WMT) Product produced (Spod Conc): 576,456 Wet Metric Tonnes
Category 52: Electric Power Generation Assessed capacity – 64 MW gas power station	16.85 MW
Category 54: Sewage Facility Design capacity – 210 cubic metres per day	Average per day: 100 m <sup>3</sup> Minimum per day: 58 m <sup>3</sup> Maximum per day: 147 m <sup>3</sup>
Category 57: Used tyre storage. Design capacity – 500 tyres	412 LV/HV tyres (end of June 2025)
Category 64: Class II putrescible landfill site – 9,450 tonnes per year	2,939 tonnes
Category 85B: Water desalination plant Design capacity – 3.8 GL per year (fresh water produced)	1.84 GL fresh water produced

<b>Section D – Statement of Actual Part 2 Waste Discharge Quantity</b>	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed Premises Category</b>	<b>Actual Part 2 Waste Discharge Quantity</b>
Category 5: Processing or Beneficiation of metallic or non-metallic ore	Dry Stack Tailings to EWL: 1,787,567 dry metric tonnes  Wet Tailings to Atlas: 1,493,102 tonnes
Category 85B: Water desalination plant	RO Brine to Cassiterite Pit: 376,270 m <sup>3</sup> (0.376 GL)  RO Brine diluted for use as dust suppression: 946,201m <sup>3</sup> (0.946 GL)

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 9; Table 4	Date(s) of non-compliance:	1 August 2024
Details of non-compliance:			
Approximately 455 m <sup>3</sup> of dry stack tails material was stockpiled within the Wodgina TSF3 facility for a period of eight (8) days (04/8/2024 – 12/08/2024). This location was at variance to the approved location designated in Schedule 1, Figure 8.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact was identified or expected as a result of the temporary stockpiling. The temporary storage location is shown in Figure below.			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> <li>A significant rain event between 2 August and 4 August 2024 (approximately 20mm) resulted in a loss of access for disposal of dry tailings to the approved location within the EWL.</li> <li>Stockpiling of dry tailings in the approved loadout area reached capacity, requiring a temporary storage location to be established to maintain processing operations.</li> <li>In the circumstances, a location within TSF3 was identified as the most appropriate area for the temporary stockpiling of the dry tailing material.</li> </ul>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate Actions:</p> <ul style="list-style-type: none"> <li>Dry tailings were rehandled to the approved EWL location as soon as access to the approved location was reinstated.</li> </ul> <p>Additional Actions:</p> <p>Authorisation to use dry stack tailing for sheeting within the Premises has been included within the most recent Licence amendment submitted 8 July 2025 (APP-0029829 under assessment)</p>			
Was this non-compliance previously reported to DWER? No			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 3; Table 2	Date(s) of non-compliance:	23 June 2025
Details of non-compliance:			
<p>During the reporting period, an estimated total of 750 used tyres (both light vehicle and heavy vehicle) were stored within the approved used tyre storage areas at one time, prior to final disposal within the Eastern Waste Landform (EWL).</p> <p>This number is above the approved allowable number permitted under Condition 3 (500).</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No actual or suspected environmental impact identified as a result of the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The cause of the non-compliance was due to a delay in the establishment of a new tyre disposal cell within the EWL.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate Actions:</p> <ul style="list-style-type: none"> <li>• The mining team created a new tyre disposal cell within the EWL (capacity of approx. 750t) and the surplus tyres were relocated to this location as soon as practicable.</li> </ul> <p>Additional Actions:</p> <ul style="list-style-type: none"> <li>• MinRes to submit a Part V Licence amendment application to allow for the disposal of tyres within EWL 2. This will allow for multiple disposal cells to be available for used tyres across two landforms: EWL 1 (formerly EWL) and EWL 2.</li> <li>• Site communication to reiterate importance of correct tyre disposal, storage and record keeping was conducted.</li> </ul>			
Was this non-compliance previously reported to DWER? No			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 7	Date(s) of non-compliance:	8 November 2024
Details of non-compliance:			
Windblown waste (was identified outside of the designated landfill area.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact identified as a result of the non-compliance.			
Cause (or suspected cause) of non-compliance:			
Shade cloth installed to capture windblown waste from the landfill degraded, allowing waste to move beyond the landfill boundary.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Immediate Actions: <ul style="list-style-type: none"> <li>• All windblown waste collected and returned to active cell;</li> </ul> Additional Actions: <ul style="list-style-type: none"> <li>• Increase frequency of covering the active cell following receipt of waste and continue regular inspections.</li> <li>• Install additional control measures to ensure litter stays within the boundary of the fenceline (eg shadecloth, or different fencing gauge).</li> </ul>			
Was this non-compliance previously reported to DWER? No			
Yes,			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 12, Table 6	Date(s) of non-compliance:	1 July 2024
Details of non-compliance:			
<p>Six (6) groundwater monitoring wells were not constructed, developed and determined to be operational prior to the progressive expansion of the Eastern Waste Landform (EWL) and resulting decommissioning of the existing EWL monitoring wells within the timeframe specified in the Licence:</p> <ul style="list-style-type: none"> <li>• EWL5YPMB001</li> <li>• EWL5YPMB002</li> <li>• EWL5YPMB003</li> <li>• EWL5YPMB004</li> <li>• EWL24_MB001_S</li> <li>• EWL24_MB001_D</li> </ul> <p>Construction of the required bores was completed 21 February 2025 and detailed within the Construction Compliance Report. The bore construction was acknowledged by Department of Water and Environmental Regulation (DWER) by return communications on 22 May 2025 (DWER Reference APP-0028678).</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No actual (or suspected) environmental impact is considered to have occurred from the delayed installation. Monitoring events at these bore locations following installation and commissioning do not indicate the occurrence of seepage from the EWL1 landform.			
Cause (or suspected cause) of non-compliance:			
Communication deficiency between mine planning and water infrastructure team resulting in bore construction not occurring prior to the expansion of the EWL1 landform.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Construction of the required bores was completed 21 February 2025, with the construction compliance report submitted 22 April 2025, within the 60-day timeframe as required under L4328 Condition 12 Table 6.			
Was this non-compliance previously reported to DWER?			
Yes – the failure to meet time frame for installation of the bores was reported in the Construction Compliance Report submitted 22 April 2025			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 22 /04 /2025	
		DWER Reference APP-0028678	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 3; Table 2	Date(s) of non-compliance:	1 August 2024
Details of non-compliance:			
<p>Dry stack tailings were used for a purpose not described in Condition 3, Table 2.</p> <p>During the reporting period, dry stack tailings were used for sheeting within the prescribed premises, including drill floors, digger shut pads, pit floors, the ROM and access roads located within the TSF3 footprint.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No actual or suspected environmental impact identified as a result of the use of dry stack tailings.			
Cause (or suspected cause) of non-compliance:			
<p>A lack of suitable material on site to address uneven work areas that pose a potential risk to both the safety of Wodgina operations personnel and equipment.</p> <p>Dry stack tailings utilized without prior consultation with the environment team as the material is readily available, inert and fine grade.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate Actions:</p> <ul style="list-style-type: none"> <li>• Use of dry tailings for unauthorised purposes ceased.</li> <li>• Site notice issued regarding approved purposes for dry stack tailings.</li> </ul> <p>Additional Actions:</p> <ul style="list-style-type: none"> <li>• Part V Licence amendment application APP-0029828 submitted by MinRes on 8 July 2025 includes the use of dry stack tailings as sheeting across the Prescribed Premises.</li> </ul>			
Was this non-compliance previously reported to DWER? No			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 29; Table 13	Date(s) of non-compliance:	1 October 2024
Details of non-compliance:			
<p>Monitoring requirements, as described in Condition 29 (Table 13) were not undertaken for Recovery Bores RB2 and RB3 during the reporting period, including:</p> <ul style="list-style-type: none"> <li>• Water quality samples not collected on a quarterly basis.</li> </ul> <p>Standing water levels were sampled on a monthly basis from the monitoring bores adjacent each groundwater bore – RB2M and RB3M.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No actual or suspected environmental impact identified as a result of failing to undertake water monitoring requirements for RB2 and RB3. Abstraction occurred from RB2 up to September 2025. During this time and throughout the reporting period, SWL measurements at both monitoring bores (RB2M and RB3M) measured the monitoring bores as consistently dry, indicative of no seepage.</p>			
Cause (or suspected cause) of non-compliance:			
<p>No sampling access to RB2 and RB3 – monitoring bores have been installed adjacent for SWL measurement, however bores were not constructed with sample points to allow for sampling, with inconsistent abstraction post September 2025 has presented difficulties in obtaining samples.</p> <p>Lack of escalation process to inform NPI (non-process infrastructure) team of access issues to be resolved.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate Actions:</p> <ul style="list-style-type: none"> <li>• Dip tubes or piezometers to be installed prior to the November 2025 sampling period where bores are operational and monitoring bore is dry.</li> <li>• NPI team will ensure bores are operational and accessible for future monitoring (as required).</li> </ul> <p>Additional Actions:</p> <ul style="list-style-type: none"> <li>• MinRes to review standard for construction of monitoring bores in relation to provision of adequate sampling points.</li> </ul>			
Was this non-compliance previously reported to DWER? No			
Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 3; Table 2	Date(s) of non-compliance:	4 June 2025
Details of non-compliance:			
On the 4 June 2025, the SWL of the Tinstone Pit Lake (located within the broader Cassiterite Pit shell) was recorded at 230.38mRL, which exceeded the Cassiterite Pit freeboard limit of 10m freeboard (230mRL).			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact identified as a result of the Tinstone Pit SWL being slightly above the freeboard limit.			
Cause (or suspected cause) of non-compliance:			
Water transfers into Cassiterite Pit from transfer pumps exceeded the volumes that could be effectively disposed of through the use of in pit evaporators (cannons) to maintain the required freeboard.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Upon confirmation of the freeboard exceedance, transfer pumps were turned off to prevent further increase in water level. In-pit evaporators continued to be utilised to manage the water levels back to the required level.</p> <p>The freeboard limit has been physically demarcated at the site to allow the level to be assessed during daily inspections.</p> <ul style="list-style-type: none"> <li>In internal trigger limit above the 230mRL has been put in place to prevent future incidents.</li> </ul> <p>An overarching Water Management Plan for the Project is being prepared under L4328 Amendment <i>draft</i> Condition 37, to be submitted within the next reporting period. This plan will include provisions to facilitate the treatment and reuse of water onsite, providing options to manage water levels within Tinstone and Cassiterite Pit.</p>			
Was this non-compliance previously reported to DWER? No			
Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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**Section F – Declaration**

I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.



Date:	31 October 2025	Date:	
Seal (if signing under seal):			

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

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