

Annual Audit Compliance Report form

Environmental Protection Act 1986, Part V

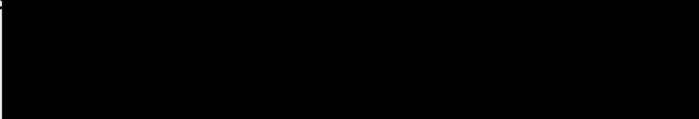
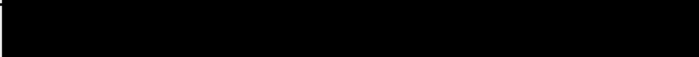
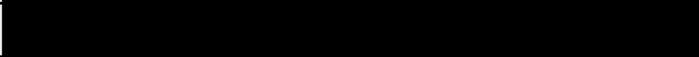
Section A – Licence Details			
Licence Number:	L6951/1997/13	Licence File Number:	DER2013/001113-1~1
Licence Holder:	Pilbara Iron Pty Ltd		
Trading as:	Pilbara Iron Pty Ltd		
ACN:	107 216 535		
Registered address:	Level 18, Central Park. 152-158 St. Georges Terrace, PERTH WA 6000		
Reporting period:	1 January 2025 to 31 December 2025		

Section B – Statement of compliance with licence conditions	
Did you comply with all of your licence conditions during the reporting period?	
Yes <input type="checkbox"/>	Please complete Sections C, D (if required) and sign the declaration in Section E
No <input checked="" type="checkbox"/>	Please complete Sections C, D (if required), F and sign the declaration in Section E

Section C – Statement of actual production		
Provide the actual production quantity for this reporting period.*		
Category	Premises description	Actual production quantity (2025)
5	Processing or beneficiation of metallic or non-metallic ore	150,507,000 Tonnes
58	Bulk material loading or unloading	150,507,000 Tonnes
61A	Solid waste facility	230 Tonnes
73	Bulk storage of chemicals, etc	214.87 m ³

*Supporting information provided in the relevant conditions of the 2025 Annual Environment Report

Section D – Statement of actual Part 2 waste discharge quantity		
Provide the actual Part 2 waste discharge quantity for this reporting period.		
Category	Premises description	Actual Part 2 waste discharge quantity (2025)
Not Applicable – no categories relevant to Part 2 waste discharge quantity.		

Section E – Declaration	
I declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular ¹ . I consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.	
Signature ² :	
Name: (printed)	
Position:	
Date:	29 April 2026

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

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

Section F – 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 number:	1	Date(s) of non-compliance:	1 Jan – 31 Dec 2025
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Details of non-compliance:

The dust collection system installed on the East Intercourse Island (EII) screenhouse has come to end of life as access to spares has impacted the effectiveness of continuing ongoing maintenance. The dust collector is now offline and will be fully replaced with a new dust collecting system. The design process is currently underway and construction will commence in 2027. Alternative dust controls have been applied to minimise dust generation during ore screening activities.

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

Alternative dust controls including additional ore moisture conditioning on lump ore stockpiles and the installation of spray bars on the 17E conveyor, immediately upstream of the screening area, have been applied to minimise dust generation during screening activities.

There was one exceedance of the PM₁₀ 24-hour average in Dampier Town during the reporting period, however, this exceedance was considered to be due to the cumulation of dust from across EII operations rather than the screenhouse specifically as evidence by dust monitoring data.

It is considered unlikely that the dust collector not being in operation has resulted in measurable adverse environmental impact due to the alternative controls applied.

Cause (or suspected cause) of non-compliance:

The dust collector has reached end of life as spare parts are no longer available to effectively maintain the screenhouse.

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

There were no adverse effects associated with the non-compliance requiring mitigation. In any case, the following actions have been taken to prevent recurrence:

- The existing dust collector maintenance tactics are considered fit-for-purpose however access to spare parts has significantly impacted the effectiveness of the maintenance tactics required.
- The screenhouse dust collector will be replaced and is scheduled to commence construction in 2027 with an estimated life span of 20+ years.

Was this non-compliance reported to the DWER?

Yes:

Reported to DWER verbally Date:

Reported to DWER in writing Date: 30 Apr 2025

No

Section F – 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 number:	1	Date(s) of non-compliance:	October 2025
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Details of non-compliance:

An internal audit of dust suppression sprays and cannons was conducted on East Intercourse Island (EII) from 27 to 29 October 2025. The audit identified that:

- A number of conveyors do not have water spray systems installed, which has been identified as a deviation from the design of the conveyors, but requires further investigation to determine if required in order to appropriately manage dust.
- Water spray systems on four of the five conveyor transfer chutes had significantly deviated from the design and the resultant effectiveness of dust suppression requires further investigation.
- Water spray systems on the reclaimers are not currently operational and minor maintenance is required on water spray systems installed on the stackers and ship-loaders to improve effectiveness of dust suppression.
- Water cannons along three of six stockyard runways are not currently operational as they are isolated due to low water pressure.

The opportunities for improvement identified via the internal audit have developed into a work program that will be implemented through out 2026.

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

It is considered unlikely that dust suppression in place resulted in a material impact to the environment. There were ten PM₁₀ 24-hour average exceedances of the 50ug/m³ limit at Dampier Town in the reporting period and only two of these events are likely to have been a result of dust contributed from EII operations. All other exceedances were deemed to be of a result of high background dust levels or sea haze.

Cause (or suspected cause) of non-compliance:

The contributing factors impacting the effectiveness of the dust suppression is under investigation but it is likely that:

- Changes to the design of dust suppression systems over time have not been accurately recorded and further investigation required to confirm that current design aligns with best practices for industry standards.
- Variation from the recorded design has impacted the effectiveness of maintenance tactics as in some instances it is unclear to what design the dust suppression infrastructure is to be maintained to meet.
- Water infrastructure across the stockyards has reached end of life resulting in lower water pressure and impacts to the effective operation of some canons.

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

The dust suppression systems across EII, including conveyors, transfer chutes and mobile plant, is currently underway with the updated design to be completed in 2027 and subsequently upgraded or replaced where required, through subsequent annual capital planning processes.

An interim targeted campaign to improve the current dust suppression will be completed in 2026 to:

- Replace the existing water infrastructure across the stockyards to improve water pressure and ensure all canons are operating effectively.
- Update the maintenance tactics to align to the current design of dust suppression infrastructure to ensure all current dust suppression maintained to operate effectively.
- Reinstate dust suppression on the stackers and undertake minor maintenance of dust suppression on the reclaimers and ship-loaders.

The ongoing monitoring of dust generation and dust levels at Dampier Town will continue to be undertaken and additional escalating dust controls applied as per the Trigger, Action and Response Plan (TARP).

Was this non-compliance reported to the DWER?	
<input type="checkbox"/> Yes: <input type="checkbox"/> Reported to DWER verbally Date: <input type="checkbox"/> Reported to DWER in writing Date:	<input checked="" type="checkbox"/> No

Section F – 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 number:	1	Date(s) of non-compliance:	25 Feb – 31 Mar 2025
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Details of non-compliance:

The dust collection system installed on the East Intercourse Island (EII) car dumper was damaged due to the flooding of assets caused by Cyclone Sean that occurred on 19 January 2025. The dust collector was not operational when operation of the car dumper started on 25 February 2025 till 31 March 2025 when the repairs were commissioned.

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

It is considered unlikely that the dust collector not being in operation has resulted in adverse environmental impact. During the dust collector non-operational period, there was one exceedance of the PM₁₀ 24-hour average in Dampier Town that was due to the cumulative impact of dust generation from EII operations and regional dust event (sea haze) rather than from dust generated specifically from the car dumper.

Cause (or suspected cause) of non-compliance:

The dust collector was damaged due to the flooding event on the car dumper on 19 January 2025.

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

The dust collector was repaired and with additional dust controls applied in the interim including:

- Use of a portable dry fog system from 3 March till 31 March 2025.
- Manual dust suppression of ore within the car dumper via hosing.

The surface water management design has been reviewed and updated to include additional surface water controls such as diversion bunding to prevent future flooding of the car dumper during significant rainfall events.

Was this non-compliance reported to the DWER?	
<input type="checkbox"/> Yes: <input type="checkbox"/> Reported to DWER verbally Date: <input type="checkbox"/> Reported to DWER in writing Date:	<input checked="" type="checkbox"/> No

Section F – 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 number:	15	Date(s) of non-compliance:	Feb to Oct 2025
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Details of non-compliance:

HIP05 discharge flow sensor was damage due to Cyclone Sean in January 2025 and stopped sampling on 19 January 2025. Access road was cut off due to damage of the flood, and the site was only accessible in March 2025. A new logger, battery, regulator and telemetry module was ordered in March 2025 and installed in May 2025. The system was fully repaired in July but was damage within a few days due to native fauna destroying the cables. HIP05 was again repaired and Solar panel change in November 2025.

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

There were no adverse environmental impacts associated with the faulty sensor. Discharge samples monitor during Q2 and Q3 of 2025 shows that hydrocarbons were all below the Limit of Reporting.

Cause (or suspected cause) of non-compliance:

The cause of the non-compliance was due to the HIP05 flow sensor being damaged due to Cyclone Sean, accessibility to discharge station post cyclone and then ongoing challenges of getting the system back online.

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

The unit is back online and the occurrence of the faulty flow sensor was only due to the high rainfall event cause by Cyclone Sean.

Was this non-compliance reported to the DWER?

<input type="checkbox"/> Yes:		
<input type="checkbox"/> Reported to DWER verbally	Date:	<input checked="" type="checkbox"/> No
<input type="checkbox"/> Reported to DWER in writing	Date:	

Section F – 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 number:	16	Date(s) of non-compliance:	2025
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Details of non-compliance:

Quarterly water quality sampling of discharge points was not able to be completed for:

- Q1 water samples for HIP01 and HIP05.
- Q2 water samples for HIP06
- Q3 water samples for HIP03, HIP06, HIP07, HIP10, and HIP12.
- Q4 water samples for HIP03, HIP10 and HIP12.

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

There were no adverse environmental impacts associated with the samples not collected. Discharge samples monitor at HIP01, HIP03, HIP05, HIP06, HIP07, HIP10 and HIP12 from 2022 to 2025 shows that total recoverable hydrocarbons were all below the Limit of Reporting.

Cause (or suspected cause) of non-compliance:

The discharge points were observed to be not flowing/low flow volume or dry when quarterly sampling was scheduled and no follow-up sampling was scheduled. HIP05 was unable to be sampled in Q1 due to damage access road cause by Cyclone Sean.

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

Discharge stations that were observed to be not flowing/low flow volume or dry will be reattempted at a monthly frequency to ensure capture of samples within the quarterly and additional consideration will be made to scheduling sampling in response to rainfall events.

Was this non-compliance reported to the DWER?

Yes:

Reported to DWER verbally Date:

Reported to DWER in writing Date:

No

Section F – 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 number:	21(b)	Date(s) of non-compliance:	1 Aug – 31 Dec 2025
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Details of non-compliance:

Monthly soil aeration (tilling) was not completed at the landfarm for the months of August, September, October, November and December 2025. The contractor engaged for aeration works withdrew due to scheduling constraints, and an alternative contractor could not be secured in time. As a result, the licence requirement for monthly aeration was not met for five consecutive months.

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

Missed monthly aeration between August and December 2025 is not considered to have resulted in adverse environmental impact. Groundwater monitoring shows hydrocarbons present beneath/adjacent to the facility (MB1, MB2 and MB3) were all below the Limit of Reporting.

Cause (or suspected cause) of non-compliance:

The primary cause was the unexpected withdrawal of the contracted service provider in August 2025, as they were unable to meet the required monthly schedule due to other work commitments. Efforts to source an alternative contractor were unsuccessful for several months because most providers in Karratha did not offer this specialised service or lacked suitable equipment.

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

A new contractor was secured in December 2025 and fixed monthly aeration schedule, commencing 15 January 2026, was established to ensure reliable delivery and prevent recurrence of the non-compliance.

Was this non-compliance reported to the DWER?

<input type="checkbox"/> Yes: <input type="checkbox"/> Reported to DWER verbally Date: <input type="checkbox"/> Reported to DWER in writing Date:	<input checked="" type="checkbox"/> No
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