



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L9056/2017/1	Licence file number:	DER2017/000318
Licence holder:	Pilgangoora Operations Pty Ltd		
Trading as:	PLS Ltd (formally Pilbara Minerals Pty Ltd)		
ACN:	616 560 395		
Registered address:	Level 2, 146 Colin Street, WEST PERTH WA 6005		
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">• section C;• section D if required; and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D if required;• section E; and• sign the declaration at Section F.

Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
Category 5: Processing Plant	3,277,242 dmt crushed ore 1,918,721 tonnes tailings produced
Category 6: Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore.	Zero tonnes per annum
Category 52: Electric power generation	35 MW (W6051/2017/1 assessed production / design capacity set at 36 MW during TLO)
Category 54: Sewage facility	271m ³ /day
Category 64: Putrescible landfill	2,944 tonnes

Category 73: Bulk storage of chemicals	1,180 m ³ (Diesel and Chemical storage only, figure does not include LNG as it is not a liquid at standard temperature & pressure)
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Section D – Statement of Actual Part 2 Waste Discharge Quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity

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	Date(s) of non-compliance:	Multiple Dates
Details of non-compliance:			
<p>For each calendar month of the FY25 reporting period, numerous licensed monitoring bores exceeded either the licence trigger and / or licence limit for Standing Water Level (SWL). On regular occasions TMFMB004 and PWBMB004 exceeded the licence trigger value, whilst PWB038 exceeded SWL licence trigger value once only during June 2025. Again on regular occasions TMFMB001, TMFMB002, TMFMB005, PMB021, PMB022 exceeded the licence limit value for SWL, whilst PMB003, PWB039 and PWB040 exceeded the licence limit value for SWL only once during June 2025.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – 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 associated with the non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>A combination of above average rainfall for the FY25 period and increased potential seepage from the Pilgan Tailings Management Facility (TMF) is believed to have caused the shallow SWLs for some monitoring bores located in close proximity of the Pilgan TMF.</p> <p>Total rainfall at Pilgan Operation during FY24 was 272 mm, whilst during the FY25 period the operation received a total of 483mm. The above average rainfall was largely the result of the impact of Cyclone Zelia which impacted the region mid-February 2025, please note the average rainfall for Port Hedland is 310mm.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Several projects were undertaken by PLS once it was determined that there was an issue with shallow SWLs around the Pilgan TMF facility, some of these projects remain ongoing, in summary:</p> <ul style="list-style-type: none"> • A leach drain was constructed to direct recovered seepage water from the TMF into the lined underdrainage pond, where it is returned to the processing circuit. • Seepage recovery network involving the construction and commissioning of additional four recovery bores. In total PLS has five recovery bores operational with another one scheduled to start pumping during quarter three of 2025. • PLS has an ongoing project whereby the Site Processing Team are reviewing practices to determine how to maximise the density of the tailings liquor to minimise the amount of water being initially pumped into the TMF. • Finally, PLS is close to constructing Tailing Storage Facility 3 which is scheduled to receive tailings from the Pilgan Plant in January 2026. 			

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: Monthly: 10/07/24, 8/08/24, 12/09/24, 10/10/24, 22/11/24, 19/12/24, 14/01/25, 4/02/25, 8/03/25, 8/04/25, 10/05/25 & 17/06/25

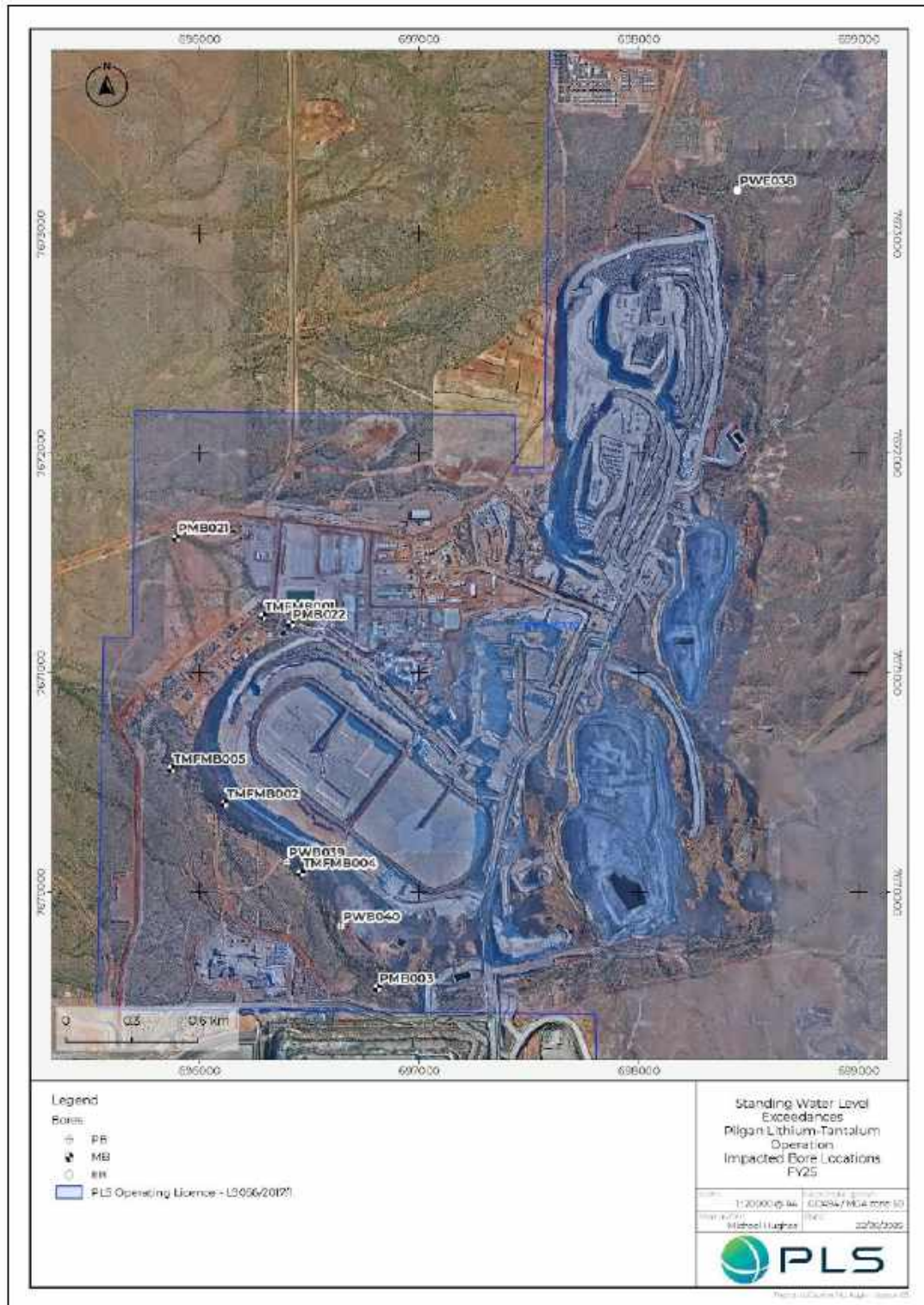


Figure 1: Location Map detailing Monitoring Bores exceeding both SWL Licence trigger and limit thresholds.

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	Date(s) of non-compliance:	Multiple Dates
Details of non-compliance:			
For the majority of the calendar months of the FY25 reporting period, numerous licensed monitoring bores exceeded licence limits for groundwater quality. On regular occasions PMB021, PMB022, PWE033, PWB040, TMFMB002 and TMFMB004 exceeded the groundwater quality licence limits for Boron, Fluoride, Sulfate, Vanadium and Total Dissolved Solids.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact associated with the non-compliance.			
Cause (or suspected cause) of non-compliance:			
The water quality non-conformances were the result of evapo-concentration of tailings water, interacting with groundwater as a result of TMF seepage.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Several projects were undertaken by PLS once it was determined that there was an issue with water quality around the Pilgan TMF facility, some of these projects remain ongoing, in summary:</p> <ul style="list-style-type: none"> • A leach drain was constructed to direct recovered seepage water from the TMF into the lined underdrainage pond, where it is returned to the processing circuit. • Two lined catchment drains were installed downstream to the Primary Rejects stockpile to collect runoff (and return to processing) to minimise interaction with surrounding surface water drainage network. • Seepage recovery network involving the construction and commissioning of additional four recovery bores. In total PLS has five recovery bores operational with another one scheduled to start pumping during quarter three of 2025. • PLS has an ongoing project whereby the Site Processing Team are reviewing practices to determine how to maximise the density of the tailings liquor to minimise the amount of water being initially pumped into the TMF. • Finally, PLS is close to constructing Tailing Storage Facility 3 which is scheduled to receive tailings from the Pilgan Plant in January 2026. 			

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date Monthly: 24/07/24, 20/08/24, 19/09/24, 25/10/24, 02/12/24, 21/01/25, 14/02/25 (x two), 24/03/25, 24/04/25, 20/05/25, 03/07/25 & 08/07/25



Figure 2: Location Map detailing Monitoring Bores exceeding Water Quality Limits

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	Date(s) of non-compliance:	21/06/2025
Details of non-compliance:			
Licenced monitoring bore TMFMB03 was unintentionally decommissioned by mining activities.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact associated with the non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Failure to adhere to the conditions of PLS internal Land Use Certificate (LUC262), as issued. LUC 262 had a nonstandard permit condition whereby TMFMB03 was not to be impacted. Contributing factors to the breach included:</p> <ul style="list-style-type: none"> • Four subsequent amendments to LUC262 conditions. • LUC / QGIS interface tool did not identify TMFMB03 existence within 'LUC checks'. • No updated LUC checklist issued with 'Version 04' of the LUC 262 map. • Bore not clearly delineated in the field. • Verbal approval to cover bore given, but not captured in formal work instructions. • Numerous dozer operators involved in the clearing of LUC 262. 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Revised LUC process (i.e. not allow subsequent/amended versions of a LUC, instead a new LUC is required for any amendment). LUC / QGIS interface tool now includes locations of production and monitoring bores, and 'flags' any overlap with LUC polygons. New software (Minestar Maps - Caterpillar Vehicle Guidance System) will also include environmental infrastructure (i.e. ground water bores), heritage and environmental monitoring sites as 'avoidance areas' thereby warning the mobile equipment operator of their existence and requirement to avoid.</p>			

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 03 / 07 / 2025



Figure 3: Location Map of TMFMB003 – Destroyed by Mining

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 5 (Table 6)	Date(s) of non-compliance:	7/02/25 & 8/05/25
Details of non-compliance:			
<p>Tailings discharged at Pilgan TMF below the minimum 50% solids concentration rate.</p> <p>Tailings discharges had an average percentage of solids of 48.4% for the period 24/01/25-03/02/25, and an average of 48.24 for the month of April 2025.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact associated with the non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>The nonconformance for the period 24/01/25-03/02/25 was the result of the construction and initial commissioning of a second tailings thickener as part of Pilgangoora's P1000 Expansion Project. The upgrade resulted in the splitting of key ultrafine fraction of tailings (slimes) to the new Heavy Media Separation thickener, which has a significant larger diameter to accommodate the very low settling rate characteristics of this material. The result was that the material was settling and consolidating faster than anticipated, therefore the tailings bed did not build conventionally and 'flow' into the discharge cone.</p> <p>The nonconformance in April 2025 was the result of a significant throughput rate loss in lead up and after a scheduled major plant shutdown (i.e. when the plant is running at a reduced rate, or lines need to be flushed).</p>			

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Nonconformance 1:</p> <ul style="list-style-type: none"> • Final tails tank autosampler has been diverted to send a portion of its stream to the flotation tails thickener. • Final tails tank receives flow from the thickened flotation tails thickener underflow and the HMS tails thickener underflow (which contains all the slimes). • This allows for some of the slimes from the HMS tails thickener to be bled into the flotation tails thickener. • Additionally, the reagent spillage pump was directed into the flotation tails thickener, this prevented direct dilution of thickened tailings. • These modifications have been successful in bringing the slurry rheology closer to what was occurring prior to P1000 i.e. greater than 50%. <p>Nonconformance 2:</p> <ul style="list-style-type: none"> • Processing Team now operates under an Operational Trigger Action Response Plan (TARP) that details different processing configurations that allow the Team to either increase or decrease tailings density as required to maintain compliant tailings densities. • During 'normal' operations i.e. between scheduled major plant shutdowns, the upgraded plant returns to and will continue to maintain average solids concentration levels above the operating licence threshold level. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 13/02/2025 & 11/05/2025



Figure 4: PLO Tailings Management Facility (Cell 1 and 2) Location Map.

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 5	Date(s) of non-compliance:	10/02/2025
Details of non-compliance:			
Following normal operational breakdowns, Cell 1 of the Pilgan Tailings Management Facility (TMF) currently has six functional piezometers to determine the phreatic surface within deposited tailings, instead of the eight piezometers that should be in place as indicated in Table 6 of Condition 5.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact associated with the non-compliance.			
Cause (or suspected cause) of non-compliance:			
VWP2 sensor stopped responding due to a lost signal in mid-2023 whilst VWP3 sensor stopped responding due to a lost signal in late October 2024.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
It was not feasible to reinstate either of VWP2 and VWP3 as they were buried within the tailings. Drilling was not an option, without the risk of breaking through the compacted clay base liner of the TMF, which would have potentially compromised the integrity of Cell 1. It was confirmed by the PLS registered tailings engineer that the tailings phreatic surface at TMF Cell 1 can still be monitored with the remaining six operational piezometers. In Q3 2025 PLS will amend L9056/2017/1 to reflect the current number of operational piezometers.			

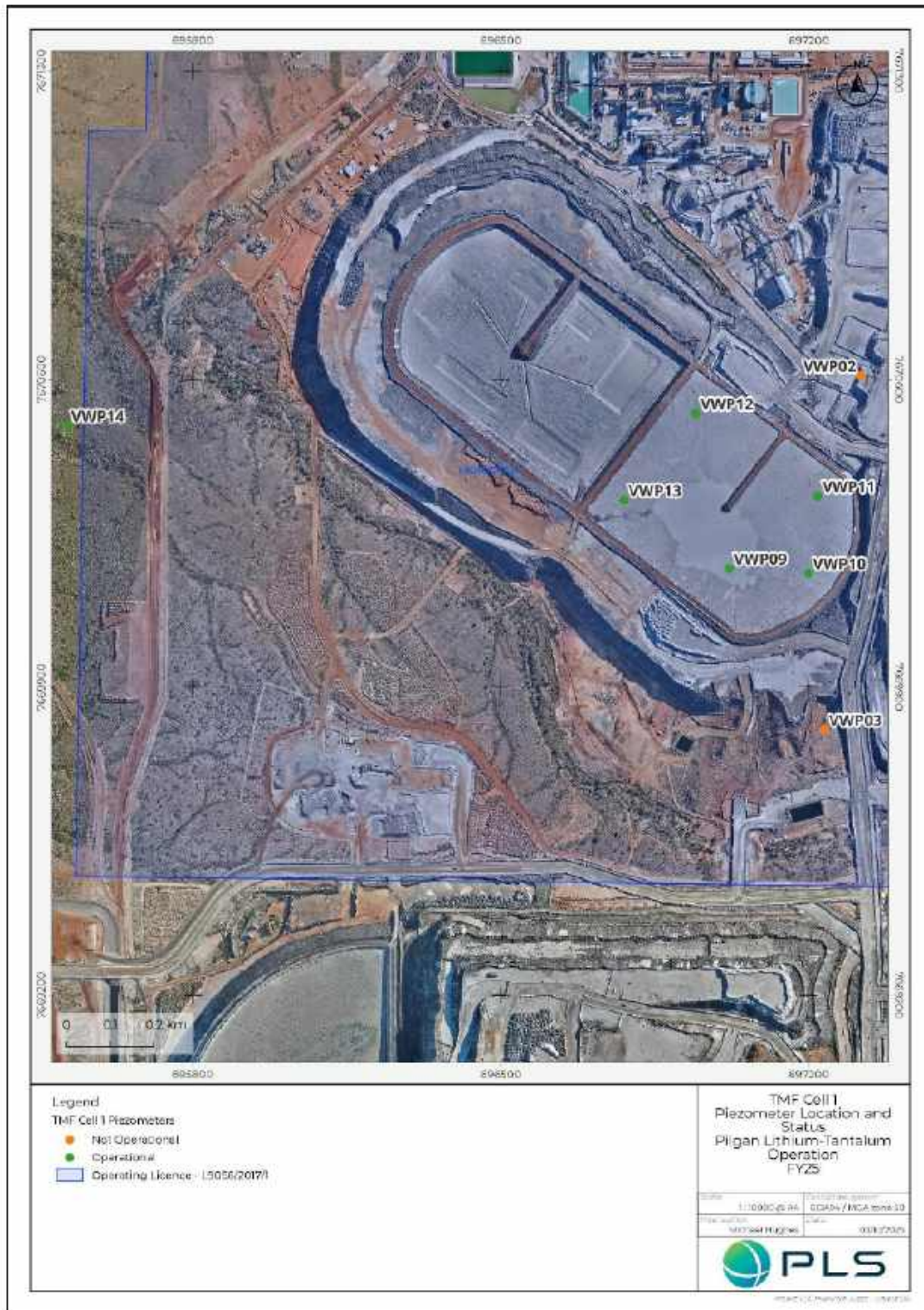


Figure 5: Location and status of TMF Cell 1 Piezometers.

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 13/02/2025

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 1	Date(s) of non-compliance:	20/07/2024
Details of non-compliance:			
Water was found pooling against the northwest corner toe of Cell 2 of the Pilgan Tailings Management Facility (TMF). The suspected seepage water from the TMF facility continued to flow a further 250 metres downstream along a neighbouring minor ephemeral stream.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No actual or suspected environmental impact associated with the non-compliance, as the results of associated water samples were all below the licence limits for ambient groundwater monitoring.			
Cause (or suspected cause) of non-compliance:			
Tailings water from TMF Cell 2 seeping through the wall and/or floor of the facility. A contributing factor was a neighbouring unlined Sediment Pond which was at near capacity due to a recent rainfall event and stormwater runoff from the Plant.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> • Installation of a 'French Drain' to intercept the tailings seepage water, which is now re-directed into the lined TMF underdrainage dam, from where it is pumped back into the processing pond/circuit. • Improved TMF daily inspection templates to prompt review for any Tailings facility seepage. • Improved TMF seepage recovery network involving the construction and commissioning of additional four recovery bores. In total PLS has five recovery bores operational with another one scheduled to start pumping during quarter three of 2025. 			

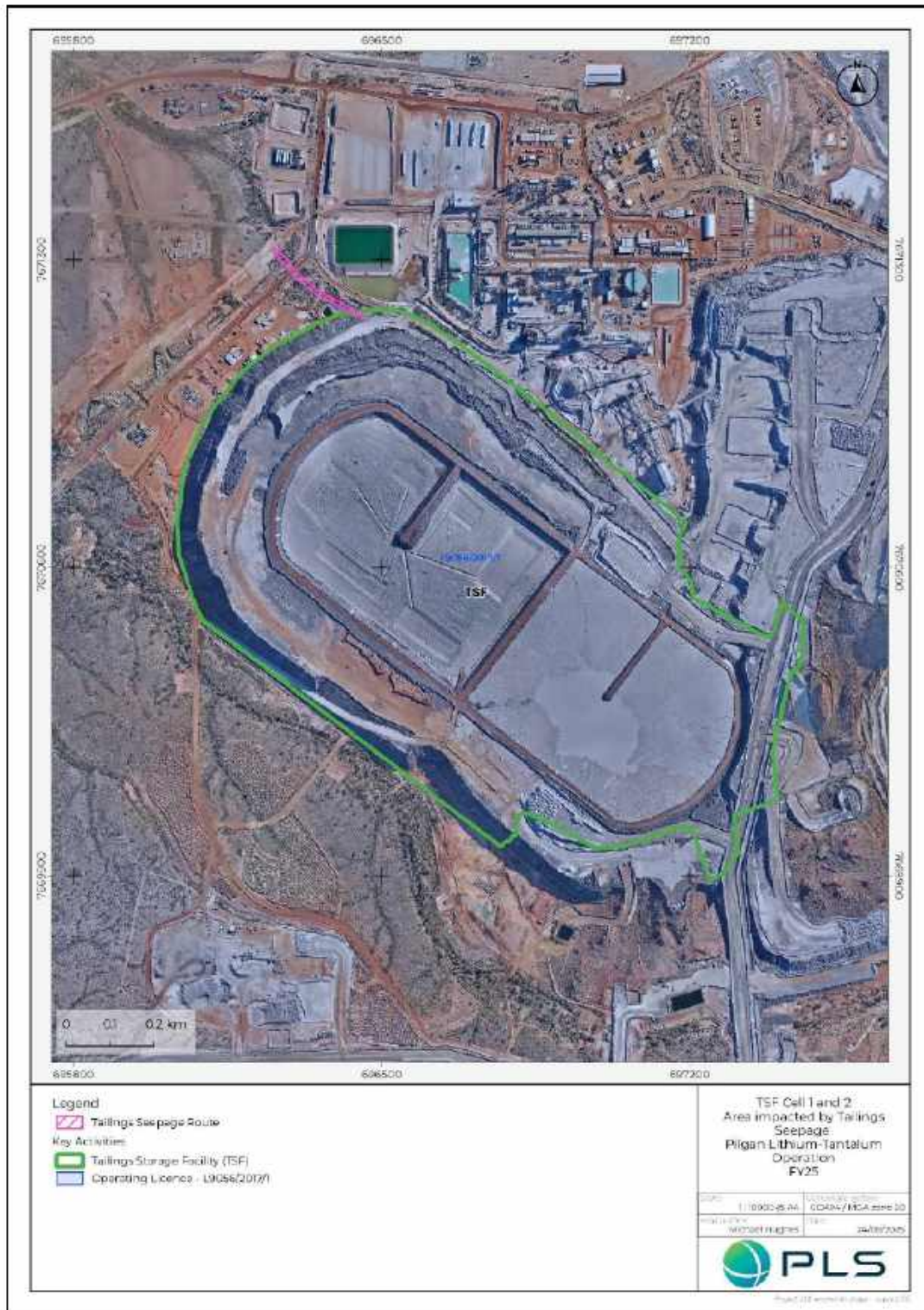


Figure 6: Area impacted by tailings seepage from TMF Cell 2.

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 22/07/2024

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 5	Date(s) of non-compliance:	18/07/2024 and 05/05/2025
Details of non-compliance:			
<p>Two administrative non-compliances with Works Approval conditions, due to failure to procure an amendment of Licence L9056 incorporating recently constructed facilities within the specified 180 days of Time Limited Operation (TLO):</p> <ul style="list-style-type: none"> • Incident 1: associated with operation of <i>Stage 2 Heavy Media Separation and Primary Rejection facility</i>. • Incident 2: associated with operation of <i>P680 Crushing and Ore Sorting plant</i> 			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – 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 associated with the non-compliances.			
Cause (or suspected cause) of non-compliance:			
<p>Incident 1:</p> <ul style="list-style-type: none"> • A written request to extend TLO was sent to DWER in July 2024. DWER advised that a TLO extension required a Works Approval amendment; however, given that an Operating Licence amendment had already been lodged (earlier in July 2024), DWER's preference was to progress the assessment of the Licence amendment instead of working on an additional Works Approval amendment. <p>Incident 2:</p> <ul style="list-style-type: none"> • The Operating Licence amendment to incorporate the recently constructed P680 Crushing and Ore Sorting plant was not finalised within approved timeframe for TLO (180 days). During this time PLS omitted to apply for a Works Approval amendment to extend TLO, and instead progressed with the application to amend the Operating Licence (L9056). 			

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

Following both events and meetings held with DWER, it was agreed that PLS would report both incidents as administrative non-compliance in the FY25 AACR.

If in the future the assessment timeframes of licence amendments looked like they are going to extend beyond approved Time Limited Operations (usually 180 days), it was agreed that meetings would be organised between PLS and DWER to discuss the best path forward.

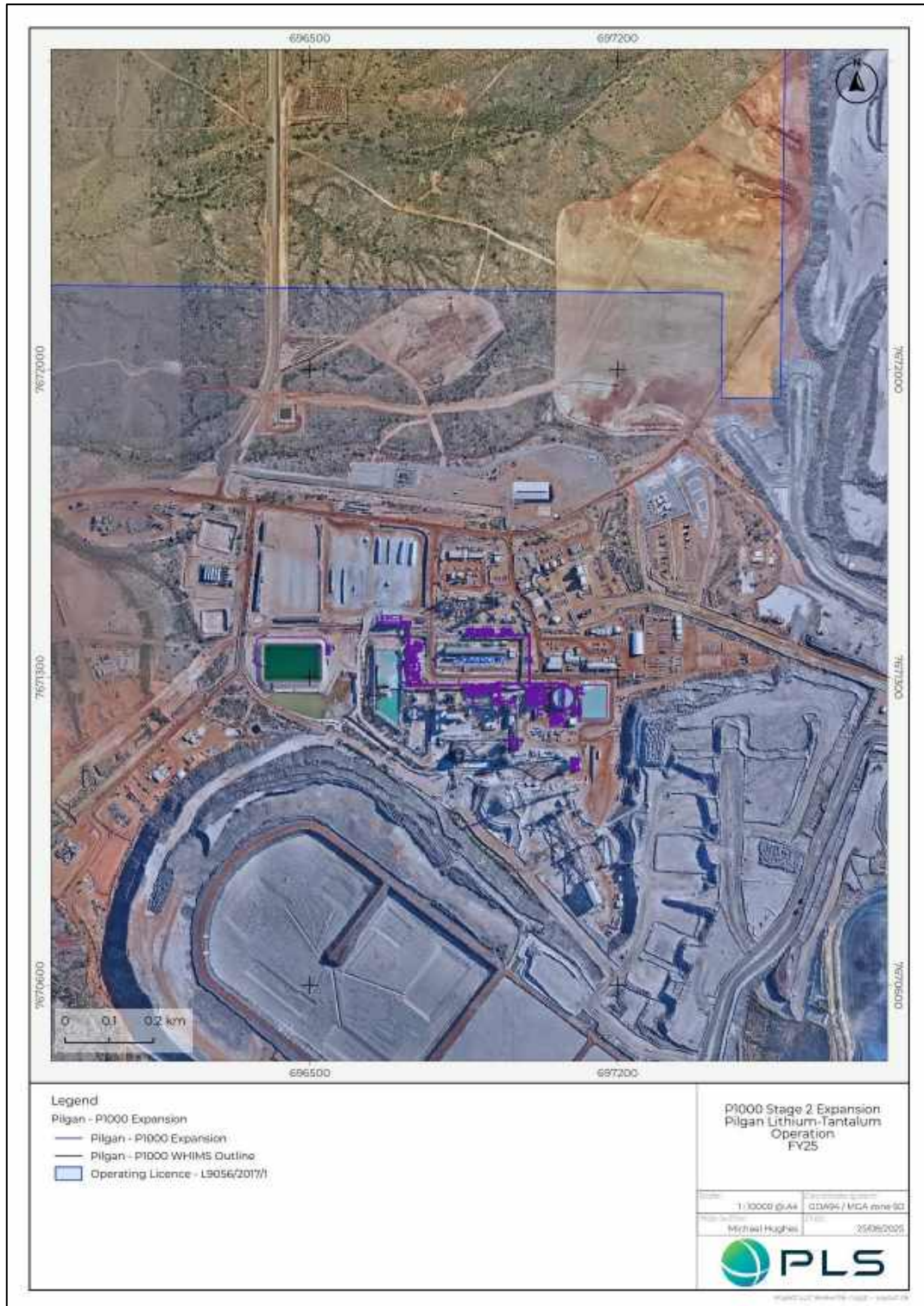


Figure 7: Compliance Issue 1: P1000 Expansion Layout

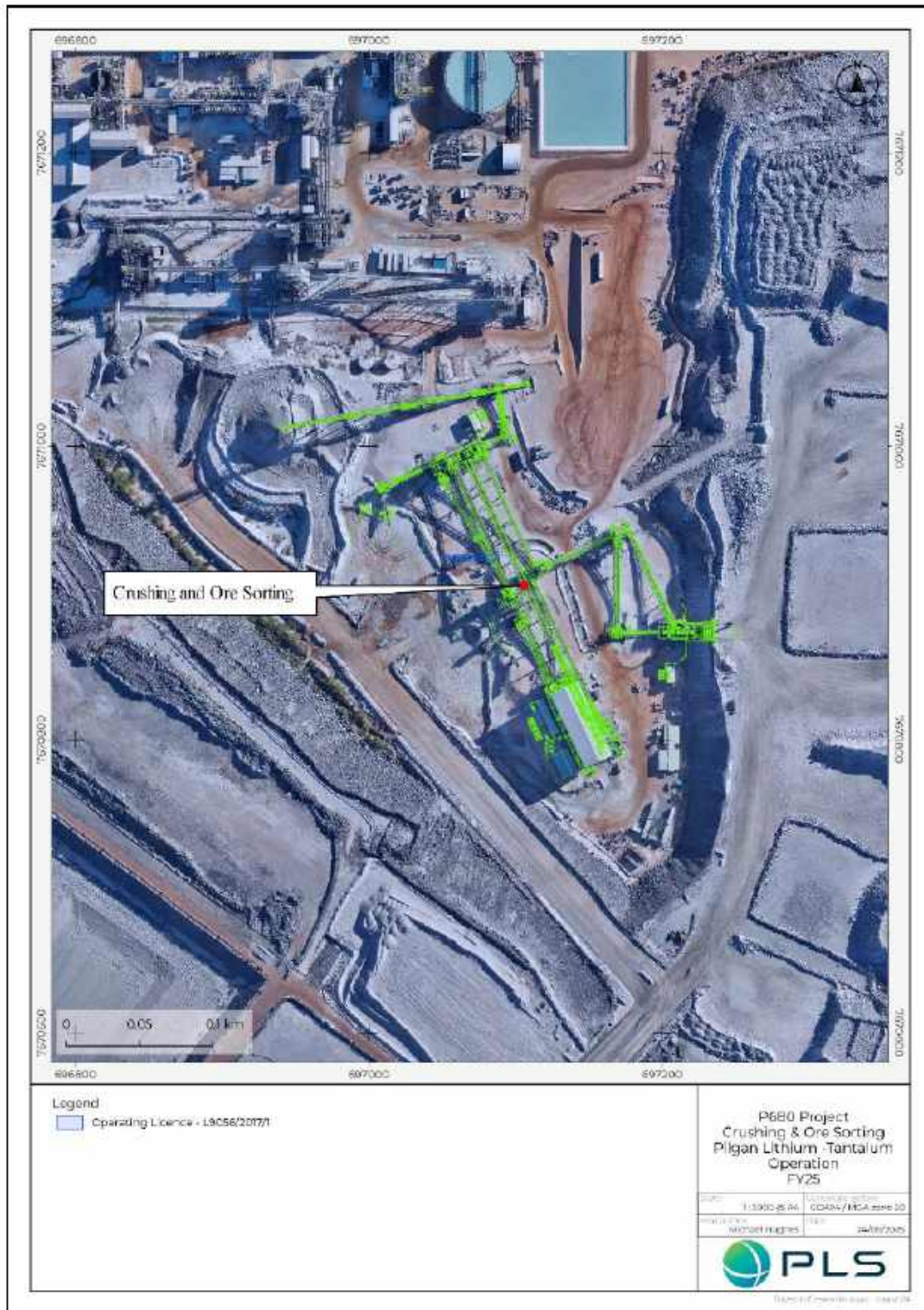


Figure 8: Compliance Issue 2: Pilgan P680 Crushing and Ore Sorting Facility

Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 19/07/2024 and 1/05/2025
Section F – Declaration	

Department of Water and Environmental Regulation

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 ¹ . I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.			
Signature ² :	[REDACTED]	Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		27/10/2025	Date:
Seal (if signing under seal):			

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

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