SUNRISE SCANDIUM-NICKEL-COBALT MINE

ENVIRONMENTAL MANAGEMENT STRATEGY

REVISION 3

17 April 2026
Project No. SEM-25-01

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1 INTRODUCTION

The Sunrise Scandium-Nickel-Cobalt Mine (the Project) is an open cut mining project situated near the village of Fifield, approximately 350 kilometres (km) west-northwest of Sydney, in New South Wales (NSW) (Figure 1).

The Project includes the establishment and operation of the following:

- mine (including the processing facility);
- limestone quarry;
- rail siding;
- gas pipeline;
- borefield, surface water extraction infrastructure and water pipeline;
- accommodation camp; and
- associated transport activities and transport infrastructure (e.g. the Fifield Bypass, road and intersection upgrades).

The Project is approved to be staged with an initial stage focussed on scandium production (referred to as the Syerston Scandium Project [the Scandium Project]) with the option to expand through a second stage nickel-cobalt project in the future. The Scandium Project includes the establishment and operation of the following:

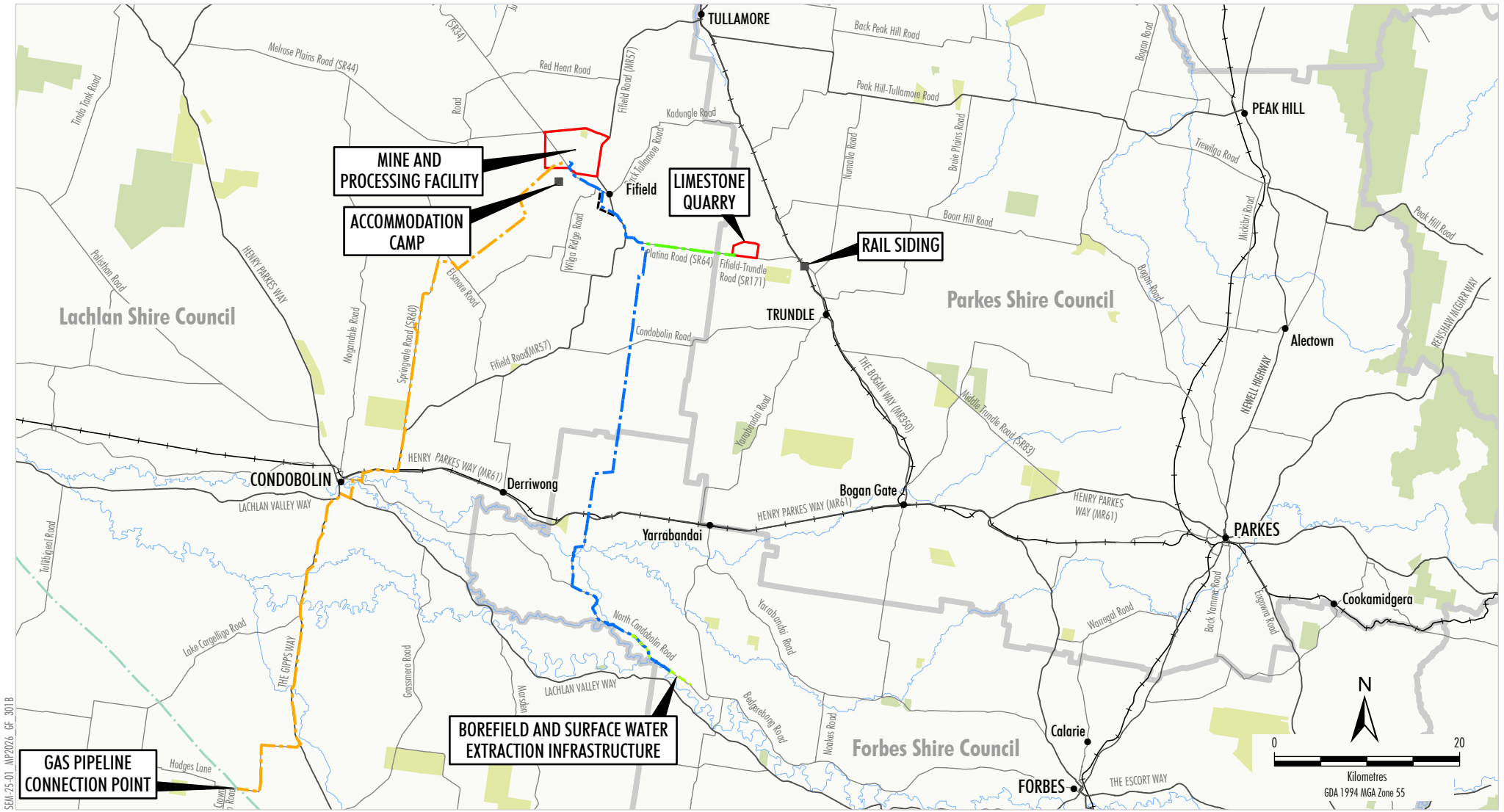
- mine (including the processing facility);
- borefield, surface water extraction infrastructure and water pipeline; and
- associated transport activities and transport infrastructure.

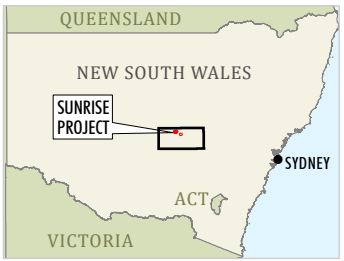
SRL Ops Pty Ltd owns the rights to develop the Project. SRL Ops Pty Ltd is a wholly owned subsidiary of Sunrise Energy Metals Limited (SEM) [1].

Development Consent DA 374-11-00 for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) in 2001. Seven modifications to Development Consent DA 374-11-00 have since been granted under the EP&A Act:

- 2005 – to allow for an increase of the autoclave feed rate, limestone quarry extraction rate and adjustments to ore processing operations;
- 2006 – to allow for the reconfiguration of the borefield;
- 2017 – to allow for the production of scandium oxide;
- 2017 – to amend hazard study requirements;
- 2018 – to relocate the accommodation camp;
- 2018 – to implement opportunities to improve the overall efficiency of the Project; and
- 2022 – to implement changes to optimise the construction and operation of the Project.

[1] SEM was previously Clean TeQ Holdings Limited (Clean TeQ).





LEGEND

- National Park/Conservation Area
- State Forest
- Local Government Boundary
- Railway
- Existing Gas Pipeline
- Mining Lease Boundary (ML)
- Gas Pipeline
- Water Pipeline
- Borefield Infrastructure Corridor
- Limestone Quarry Water Pipeline
- Fifield Bypass

Source: Sunrise Energy Metals (2021); Clean TeQ (2017, 2018, 2020); Black Range Minerals (2000); NSW Spatial Services (2022)

sunrise energy metals

SUNRISE SCANDIUM-NICKEL-COBALT MINE

Regional Location

Figure 1

1.1 PURPOSE AND SCOPE

This Environmental Management Strategy (EMS) has been prepared by SEM to satisfy the requirements of Condition 1, Schedule 5 of Development Consent DA 374-11-00 (Table 1).

The objectives of this EMS are to fulfil the relevant conditions in Development Consent DA 374-11-00 by providing a strategic framework for environmental management of the Project including all Environmental Management Plans (EMPs), strategies and programs prepared for the Project. This EMS establishes the overarching framework for the monitoring and environmental management of activities undertaken at the Project. The EMS incorporates the principles of continuous improvement and is consistent with the five pillars of International Standard Organisation 14001: Environmental Management Systems, represented in Figure 2.

Table 1
Specific Development Consent Conditions

Development Consent DA 374-11-00 Schedule 5	**Section Where Addressed in this EMS**
Environmental Management Strategy *1. Prior to carrying out any development under this consent after 6 May 2017, the Applicant must prepare an Environmental Management Strategy for the development in consultation with the relevant authorities and the CCC and to the satisfaction of the Planning Secretary. This strategy must:*	This Document
a) provide the strategic framework for environmental management of the development;	Section 1.1
b) identify the statutory approvals that apply to the development;	Section 4
c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 5.1 and Appendix B
d) include overall ecological and community objectives for the development, and a strategy for the restoration and management of the areas affected by operations, including elements such as creek lines and drainage channels, within the context of those objectives;	Section 6.2
e) identify cumulative environmental impacts and procedures for dealing with these at each stage of the development;	Section 6.3
f) describe the procedures that would be implemented to: • *keep the local community and relevant agencies informed about the operation and environmental performance of the development;* • *receive, handle, respond to, and record complaints;* • *resolve any disputes that may arise;* • *respond to any non-compliance; and* • *respond to emergencies; and*	Section 5.3 and Section 7 Section 8.2 Section 5.4 Section 8.3 Section 5.2
g) include; • *copies of any strategies, plans and programs approved under the conditions of this consent; and* • *a clear plan depicting all the monitoring to be carried out in relation to the development.*	Refer to EMPs (Appendix C) Section 6.1
2. Following approval, the Applicant must carry out the development in accordance with this strategy.	-

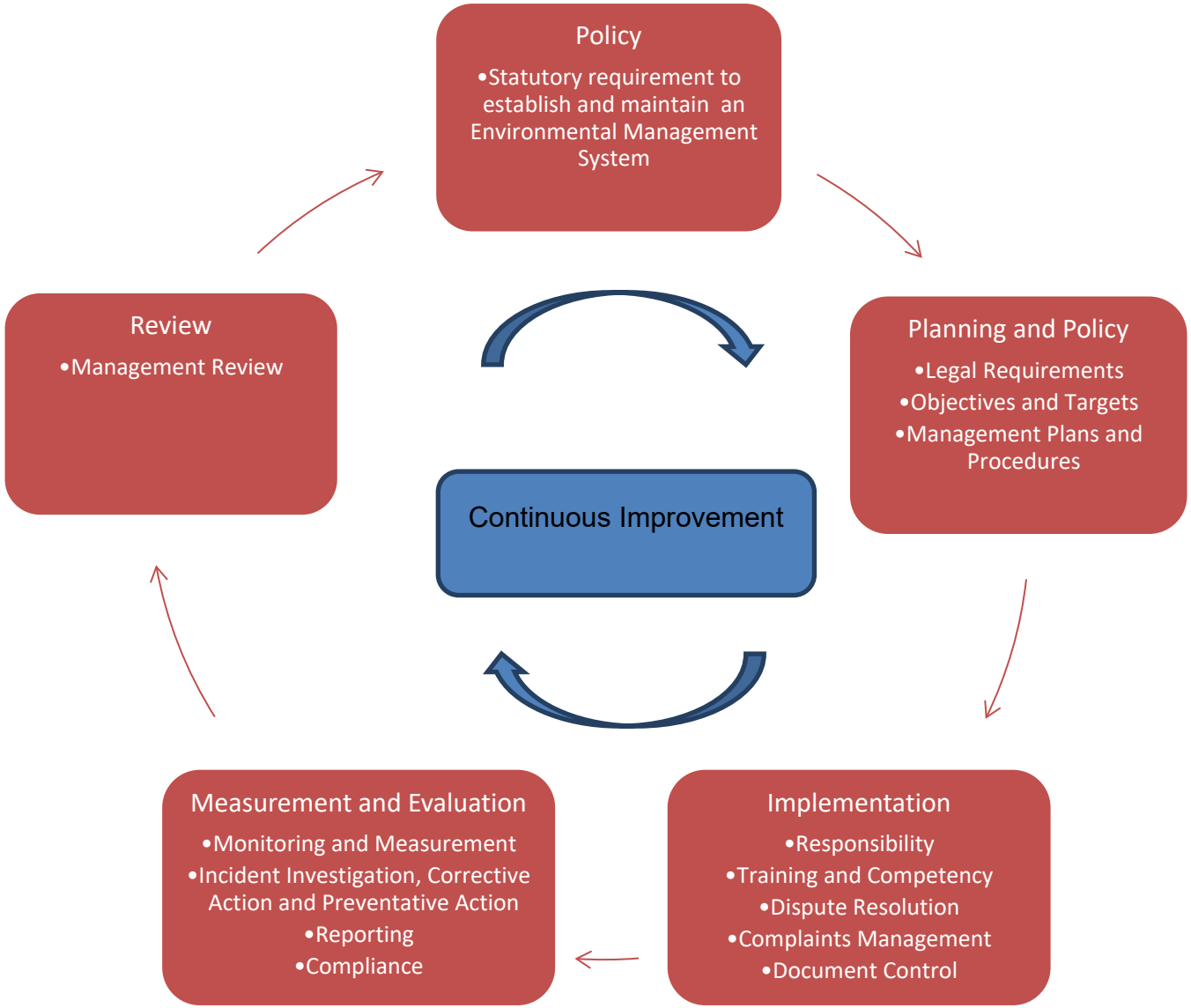


Figure 2 – SEM Sunrise Project Environmental Management Principles

The EMPs, strategies and programs required at the Project are listed in Table 2, shown on Figure 3 and included in Appendix C.

This EMS has been prepared to assist those undertaking the works on-site to apply appropriate environmental management measures. Where there is any conflict between the provisions of this EMS and the contractual obligations of any contractor, the contractor shall first request clarification from SEM prior to implementing the element of this EMS over which the ambiguity is identified. In the case of any real or perceived ambiguity between elements of this EMS and statutory requirements, the statutory requirements are to take precedence.

All initial construction activities and other related activities (e.g. monitoring) consistent with Development Consent DA 374-11-00 are covered by this EMS.

This EMS is a public document providing information for operations personnel, contractors, and community and government stakeholders. The document is available on the SEM website (https://www.sunriseem.com).

On 5 July 2018, the then Planning Secretary of the Department of Planning and Environment (DPE) (now the Department of Planning, Housing and Infrastructure [DPHI]) (the Planning Secretary) approved the progressive submission of EMPs for the Project in accordance with Condition 12, Schedule 2 of Development Consent DA 374-11-00. The scope of the previous EMS was specifically related to the initial Project construction activities for the second stage nickel-cobalt project.

On 17 February 2026, the Planning Secretary approved the continued submission of environmental management plans on a progressive (staged) basis for the initial construction activities for the Scandium Project, in accordance with Condition 12, Schedule 2 of Development Consent DA 374-11-00. The scope of this EMS is specifically related to the following initial construction activities for the Scandium Project:

- development of the mine, including:
  - site establishment and earthworks;
  - construction of site access roads and haul roads;
  - processing facility earthworks;
  - establishment of temporary facilities required for construction activities (e.g. offices, lay down areas, communications infrastructure);
  - construction of the mine infrastructure area including the offices, workshops, warehouse, laboratory and amenities buildings, fuel storage areas, communications infrastructure, potable water treatment plant and car parking facilities;
  - diesel generators and associated power distribution infrastructure;
  - construction of the tailings storage facility and evaporation pond;
  - construction of water management infrastructure including the raw water dam, water storage dam and sediment dams;
  - construction and operation of the concrete batch plant;
  - development of gravel and clay borrow pits (including blasting and crushing);
  - installation of appropriate fencing and barriers for public safety and security for mining and construction; and
  - other associated minor infrastructure, plant, equipment and activities.
- exploration activities within the approved surface development area inside Mining Lease 1770;

- development and operation of the borefield, surface water extraction infrastructure and water pipeline[2]; and
- road upgrades.

1.2 STRUCTURE OF THIS ENVIRONMENTAL MANAGEMENT STRATEGY

The remainder of this EMS is structured as follows:

Section 2: Describes the review and update of this EMS.

Section 3: Outlines the management of the EMS by SEM.

Section 4: Outlines the statutory requirements applicable to this EMS

Section 5: Outlines the implementation of the Sunrise Project Environment Management Structure.

Section 6: Outlines the Monitoring, Ecological and Community objectives of the Project.

Section 7: Provides details for the review and improvement of environmental performance.

Section 8: Describes the management and reporting of incidents, complaints and non-compliances.

Section 9: Provides references cited in this EMS.

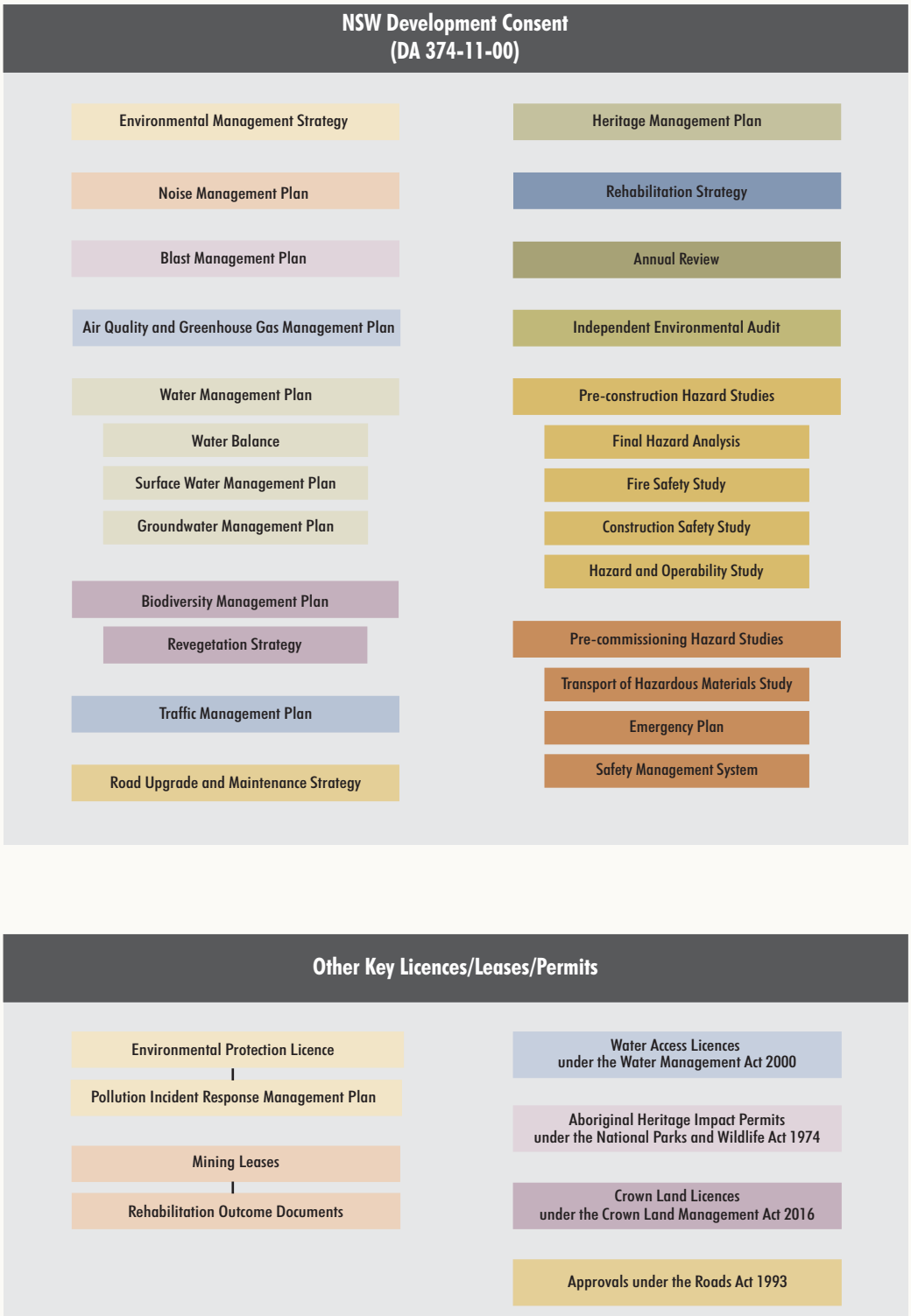
[2] The water pipeline includes the Fifield Bypass and Alternative Pipeline Route alignments.

Table 2
Summary of Required Environmental Management Strategies, Plans and Programs

Plan	EMP Framework
Environmental Management Strategy	• The objective of this document is to outline the strategic framework for environmental management at the Project.
Noise Management Plan	• Identification of relevant criteria, monitoring locations, monitoring frequency and operating conditions. • Describes the measures that will be implemented to comply with the noise criteria and operating conditions.
Blast Management Plan	• Identification of relevant criteria, monitoring methods and operating conditions. • Describes the measures that will be implemented to comply with the blasting criteria and operating conditions.
Air Quality and Greenhouse Gas Management Plan	• Identification of relevant criteria, monitoring locations, monitoring methods and program. • Describes the measures that will be implemented to comply with air quality criteria and operating conditions. • Describes the methods to evaluate compliance against criteria, operating conditions, effectiveness of the system and defines a protocol for identification of incidents and notifying of relevant parties of their occurrence.
Water Management Plan	• Includes a Water Balance, Surface Water Management Plan and Groundwater Management Plan. • Outlines the performance criteria for compliance with Water Management Performance Measures.
Biodiversity Management Plan and Revegetation Strategy	• Includes a Revegetation Strategy identifying areas to be cleared, areas available for revegetation and strategies for progressive rehabilitation. • Includes a description of the short, medium- and long-term measures to be implemented to ensure the Revegetation Strategy is effectively implemented. • Detailed description of the measures to be implemented to protect biodiversity (e.g. protecting vegetation and fauna habitat, maximising the salvage of resources within the disturbance area, etc.). • A program to monitor and report on the effectiveness of these measures. • Describes the potential risks to successful implementation of the Biodiversity Management Plan and associated contingency measures. • Includes details of who is responsible for monitoring, reviewing and implementing the Biodiversity Management Plan.

Table 2 (Continued)
Summary of Required Environmental Management Strategies, Plans and Programs

Plan	EMP Framework
Heritage Management Plan	• Describes the measures that will be implemented for management and protection of known and unknown heritage items, access arrangements to heritage items and ongoing consultation with stakeholders. • Details procedures of managing both aboriginal and non-aboriginal sensitive heritage items and values.
Rehabilitation Strategy	• Identification of relevant performance and completion criteria for the rehabilitation of the site. • Describes the measures that will be implemented to rehabilitate the site. • Consideration of a Mine Closure Strategy, including principle objectives of mine closure planning for the Project. • A program to monitor, independently audit and report on the effectiveness of these measures.
Road Upgrade and Maintenance Strategy	• Describes the measures that will be undertaken to identify and upgrade roads and intersections required for the Project. • Outlines the maintenance strategy on relevant sections of road network following the upgrades.
Traffic Management Plan	• Describes all traffic and transport routes to be used during the development. • Development of the Road Transport Protocol and safety procedures related to traffic.



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Sunrise Scandium-Nickel-Cobalt Mine

Environmental Management System
Structure Summary

Figure 3

2 ENVIRONMENTAL MANAGEMENT STRATEGY REVIEW AND UPDATE

On 17 February 2026, the Planning Secretary approved the submission of environmental management plans for the initial construction activities of the Scandium Project without conducting additional consultation in accordance with Condition 12, Schedule 2 of Development Consent DA 374-11-00. As such the EMS was not provided to the relevant agencies or Community Consultative Committee (CCC) for the purposes of consultation.

Consistent with the Planning Secretary's approval for the progressive submission of environmental management plans on 17 February 2026, this EMS will be re-submitted for approval prior to the commencement of construction of the second stage nickel-cobalt mine (including limestone quarry, rail siding and gas pipeline), as well as prior to the commencement of mining operations.

In accordance with Condition 6, Schedule 5 of Development Consent DA 374-11-00, this EMS will be reviewed, and if necessary revised (to the satisfaction of the Planning Secretary), within three months of the submission of:

- an Annual Review (Condition 5, Schedule 5);
- an incident report (Condition 8, Schedule 5);
- an Independent Environmental Audit (Condition 10, Schedule 5); and/or
- any modification to the conditions of Development Consent DA 374-11-00 (unless the conditions require otherwise).

The reviews will be undertaken so that the EMS is updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the Project.

Within four weeks of conducting any such review, the Planning Secretary will be advised of the outcomes of the review and any revised documents submitted to the Planning Secretary for approval.

If agreed with the Planning Secretary, a revision to the EMS required under Development Consent DA 374-11-00 may be prepared without undertaking consultation with all parties nominated under the relevant condition of Development Consent DA 374-11-00.

The revision status of this EMS is indicated on the title page of each copy.

The approved EMS will be made publicly available on the SEM website, in accordance with Condition 12, Schedule 5 of Development Consent DA 374-11-00.

3 COMMITMENT AND LEADERSHIP

Environmental management is an integral part of management at the Project. Achieving effective environmental and community management requires responsible and proactive leadership. SEM's Sustainability Policy (the Sustainability Policy) will provide the governing principles for environmental and community management. The Sustainability Policy is provided in Appendix A.

Managers at the Project will demonstrate commitment by:

- implementing the principles outlined in the Sustainability Policy;
- endorsing and implementing this EMS;
- making personnel aware of their responsibilities in relation to the policy;
- ensuring the Sustainability Policy is readily accessible and displayed in prominent locations; and
- appropriately resourcing implementation and review of this EMS.

Management at the Project must demonstrate visible and proactive leadership through their commitment to achieving the EMS objectives and goals of the Sustainability Policy. The prevention and management of the potential and actual environmental impacts from Project activities will be achieved through:

- taking a systematic approach;
- taking preventive action in preference to reactive correction;
- proactive attention to environmental issues by all people in the organisation; and
- innovative changes to the way SEM operate in order to continually improve its environmental performance.

This EMS has been approved by the SEM management team.

4 STATUTORY REQUIREMENTS

SEM's statutory obligations relevant to environmental management are contained in:

- the conditions of Development Consent DA 374-11-00;
- relevant licences, permits and conditions attached to mining leases; and
- other relevant legislation.

Obligations relevant to this EMS are described below.

4.1 DEVELOPMENT CONSENT DA 374-11-00

4.1.1 EMS Requirements

Condition 1, Schedule 5 of the Development Consent DA 374-11-00 requires the preparation of an EMS. Table 1 presents these requirements and indicates where they are addressed in this EMS.

4.1.2 General Requirements

In addition to the EMS requirements prescribed in Condition 1, Schedule 5; Conditions 3 to 12, Schedule 5 of Development Consent DA 374-11-00 outlines general requirements that are also applicable to the preparation of this EMS. Table 3 presents these requirements and indicates where each is addressed within this EMS. A summary of the relevant management measures is provided in Appendix D.

Table 3
General Requirements

Development Consent DA 374-11-00 Schedule 5	EMS Section
Adaptive Management *3. The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.* *Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity:* *a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;* *b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and* *c) implement remediation measures as directed by the Planning Secretary to the satisfaction of the Planning Secretary.*	Refer to EMPs
Management Plan Requirements *4. The Applicant must ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, are consistent with other plans prepared for other stakeholders, and include:* *a) detailed baseline data;*	Refer to EMPs

Table 3 (Continued)
General Requirements

Development Consent DA 374-11-00 Schedule 5	EMS Section
b) a description of: • *the relevant statutory requirements (including any relevant approval, license or lease conditions);* • *any relevant limits or performance measures/criteria;* • *the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;*	Section 4 Refer to EMPs Refer to EMPs
c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Appendix D and Refer to EMPs
d) a program to monitor and report on the: • *impacts and environmental performance of the development;* • *effectiveness of any management measures (see c above);*	Sections 6 and 7
e) a contingency plan to manage any unpredicted impacts and their consequences;	Section 7 and Refer to EMPs
f) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 8
g) a protocol for managing and reporting any: • *incidents;* • *complaints;* • *non-compliances with statutory requirements; and* • *exceedances of the impact assessment criteria and/or performance criteria; and*	Section 9.1 Section 9.2 Section 9.3 Section 9
h) a protocol for periodic review of the plan. *Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.*	Section 2
Annual Review *5. By the end of March each year, the Applicant must review the environmental performance of the development for the previous calendar year to the satisfaction of the Planning Secretary. This review must:* *a) describe the development (including any rehabilitation) that was carried out in the past calendar year, and the development that is proposed to be carried out over the current calendar year;* *b) include a comprehensive review of the monitoring results and complaints records of the development over the past year, which includes a comparison of these results against the:* • *relevant statutory requirements, limits or performance measures/criteria;* • *monitoring results of previous years; and* • *relevant predictions in the EIS;* *c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;* *d) identify any trends in the monitoring data over the life of the development;* *e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and* *f) describe what measures will be implemented over the next year to improve the environmental performance of the development.*	Section 8.1

Table 3 (Continued)
General Requirements

Development Consent DA 374-11-00 Schedule 5	EMS Section
Revision of Strategies, Plans and Programs *6. Within 3 months of the submission of:* *a) annual review under condition 5 above;* *b) incident report under condition 8 below;* *c) audit under condition 10 below; or* *d) any modification to the conditions of this consent (unless the conditions require otherwise),* *the Applicant must review and, if necessary, revise the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.* *Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Planning Secretary for approval.* *Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.*	Section 2 Section 2
Community Consultative Committee *7. The Applicant must establish and operate a CCC for the development to the satisfaction of the Planning Secretary, in accordance with the Community Consultative Committee Guidelines for State Significant Project (2016), or its latest version. The Applicant must ensure at least one CCC meeting is held prior to any development at the mine, unless the Planning Secretary agrees otherwise.* *Notes:* • *The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.* • *In accordance with the guideline, the Committee should be comprised of an independent chair and appropriate representation from the Applicant, Councils, and the local community.*	Section 5.3
REPORTING ***Incident Reporting*** *8. The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development) and set out the location and nature of the incident. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 6.*	Section 9.1
Regular Reporting *9. The Applicant must provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.*	Section 5.3

Table 3 (Continued)
General Requirements

Development Consent DA 374-11-00 Schedule 5	EMS Section
AUDITING	Section 8.2
10. Within 1 year of the commencement of the development after 6 May 2017, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: *aa) be prepared in accordance with the relevant Independent Audit Post Approval Requirements (DPIE 2020) or its latest version;* *a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;* *b) include consultation with the relevant agencies;* *c) assess the environmental performance of the development and assess whether it is complying with the requirements in this consent;* *d) include a comprehensive Hazard Audit of the development in accordance with the Department's publication Hazardous Industry Planning Advisory paper No. 5 - Hazard Audit Guidelines, including a review of the Site Safety Management System and all entries made in the incident register since the previous Audit.* *e) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and* *f) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under these approvals.* *Note: This audit team must be led by a suitably qualified auditor, and include experts in water resources, noise, air quality, ecology, and any other fields specified by the Planning Secretary.*	Section 8.2
11. Within 3 months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, together with its response to any recommendations contained in the audit report.	
ACCESS TO INFORMATION	Section 9.5
12. The Applicant must: *a) make the following information publicly available on its website as relevant to the stage of the development:* • *the EIS;* • *current statutory approvals for the development;* • *approved strategies, plans or programs required under the conditions of this consent;* • *a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent;* • *a complaints register, which is to be updated on a monthly basis;* • *any independent environmental audit, and the Applicant's response to the recommendations in any audit; and* • *any other matter required by the Planning Secretary; and* b) *keep this information up to date, to the satisfaction of the Planning Secretary.*	

4.2 LICENCES, PERMITS AND LEASES

In addition to Development Consent DA 374-11-00, all activities at or in association with the Project will be undertaken in accordance with the following approvals, licences, permits and leases which have been issued or will be issued prior to the commencement of the relevant activities.

Key licences, permits and leases pertaining to the Project include:

- Mining Lease 1770 issued by the NSW Minister for Resources under the NSW *Mining Act 1992*.
- Rehabilitation Outcome Documents submitted to and approved by the Resources Regulator.
- Environment Protection Licence (EPL) 21146 issued under the NSW *Protection of the Environment Operations Act 1997* (POEO Act).
- Water supply works, water use approvals and water access licences (WALs) issued under the NSW *Water Management Act 2000* including:
  - Water Supply Works Approval 70CA614098 for the Project borefield.
  - Water Supply Works Approval 70WA617095 for the surface water extraction infrastructure and water pipeline.
  - WAL 32068 in the Upper Lachlan Alluvial Groundwater Source (Upper Lachlan Alluvial Zone 5 Management Zone) for 3,154 share components under the *Water Sharing Plan for the Lachlan Alluvial Groundwater Sources 2020*.
  - WAL 39837 in the Upper Lachlan Alluvial Groundwater Source (Upper Lachlan Alluvial Zone 5 Management Zone) for 766 share components under the *Water Sharing Plan for the Lachlan Alluvial Groundwater Sources 2020*.
  - WAL 28681 in the Lachlan Fold Belt Murray-Darling Basin (MDB) Groundwater Source (Lachlan Fold Belt MDB [Other] Management Zone), for 243 share components under the *Water Sharing Plan for the NSW Murray Darling Basin Fractured Rock Groundwater Sources 2020*.
  - WAL 6679 in the Lachlan Regulated River Water Source, for 123 share components (General Security) under the *Water Sharing Plan for the Lachlan Regulated River Water Source 2016.*
  - WAL 1798 in the Lachlan Regulated River Water Source, for 300 share components (General Security) under the *Water Sharing Plan for the Lachlan Regulated River Water Source 2016*.
  - WAL 42370 in the Lachlan Regulated River Water Source, for zero share components (High Security) under the *Water Sharing Plan for the Lachlan Regulated River Water Source 2016*.
- Groundwater licences for monitoring bores under the *Water Management Act 2000*.
- Aboriginal Heritage Impact Permits (AHIP #C0003049 and AHIP #C0003887) issued under the NSW *National Parks and Wildlife Act 1974*.
- Mining and workplace health and safety related approvals.
- Heavy Vehicle Authorisation Permit 119039v3 issued under the *Heavy Vehicle National Law Act 2012.*
- Crown Land Licence LN 603648 issued under Section 152A of the NSW *Roads Act 1993*.
- Crown Land Licence RI 586882 under the *Crown Land Management Act 2016* (under application).
- Permits under the NSW *Roads Act 1993*.
- Approval to install and operate a new sewage management system under the *Local Government Act 1993*.

4.3 OTHER LEGISLATION AND REQUIREMENTS

SEM will conduct the Project consistent with the requirements of Development Consent DA 374-11-00 and any other legislation that is applicable to an approved Part 4 Project under the EP&A Act.

In addition to the statutory obligations described in Sections 4.1 and 4.2, the following Acts (and their regulations) may be applicable to the conduct of the Project:

- *Aboriginal Land Rights Act 1983;*
- *Biodiversity Conservation Act 2016;*
- *Biosecurity Act 2015;*
- *Crown Land Management Act 2016;*
- *Contaminated Land Management Act 1997;*
- *Dams Safety Act 2015;*
- *Dangerous Goods (Road and Rail Transport) Act 2008;*
- *Energy and Utilities Administration Act 1987;*
- EP&A Act;
- *Fisheries Management Act 1994;*
- *Forestry Act 2012;*
- *Local Government Act 1993*;
- *Mining Act 1992;*
- *National Parks and Wildlife Act 1974;*
- *Pipelines Act 1967;*
- POEO Act;
- *Rail Safety (Adoption of National law) Act 2012;*
- *Roads Act 1993;*
- *Soil Conservation Act 1938;*
- *Water Act 1912;*
- *Water Management Act 2000;*
- *Work Health and Safety Act 2011; and*
- *Work Health and Safety (Mines and Petroleum Sites) Act 2013.*

Commonwealth Acts which may also be applicable to the conduct of the Project include:

- *Environment Protection and Biodiversity Conservation Act 1999; and*
- *Native Title Act 1993.*

Relevant licences or approvals required under these Acts will be obtained as required.

5 IMPLEMENTATION – SUNRISE PROJECT ENVIRONMENTAL MANAGEMENT STRUCTURE

An overview of the environmental management structure at the Project is illustrated on Figure 3.

5.1 ROLES AND RESPONSIBILITIES

A combination of SEM's employees and contractor staff are responsible for environmental management at the Project. The roles and responsibilities of members of the site, including the environmental management team are provided in Appendix B. All employees and contractors working at the Project are accountable for:

- complying with relevant legislation;
- complying with this EMS;
- communicating any information they become aware of in relation to environmental management; and
- taking actions to prevent and mitigate environmental impacts.

Accountabilities for environmental management are defined in this EMS to ensure personnel and contactors at the Project are aware of their roles and responsibilities.

The relevant site contacts for the Project are provided in Table 4.

Table 4
Site Contacts

SEM Position	Contact	Phone
Project Director	Geoffrey Newcombe	0409 781 857
Sunrise Regional Manager	Michael Wood	0418 818 372
Environment, Approvals & Community Lead	Bronwyn Flynn	0429 066 086
Community Complaints Line	community@sunriseem.com	1800 952 277

5.2 ENVIRONMENTAL EMERGENCIES

SEM will maintain a Pollution Incident Response Management Plan (PIRMP) that relates to its operations. This management plan will outline the process for responding to environmental emergencies in a timely and effective manner and adopting appropriate measures for the control and recovery from emergencies. Where appropriate, environmental emergency response procedures will be integrated with on-site Emergency Response Plans.

The contractor that controls and manages the activities on site is required to develop and maintain an Emergency Response Plan. The Emergency Response Plan must include the following details:

a) an effective first response to an emergency;

b) evacuation methods;

c) notifying emergency services at the earliest opportunity;

d) medical treatment and assistance;

e) effective communication with everyone at the worksite;

f) how often the emergency procedures are to be tested; and

g) instruction and training about implementing the emergency procedures.

At an overarching level SEM will also develop and maintain an Emergency Response Plan and associated services to ensure that emergencies are adequately managed.

Reporting of incidents will be undertaken in accordance with the protocol outlined in Section 8.1.

5.3 INFORMATION DISSEMINATION

Community Consultative Committee

In accordance with Condition 7, Schedule 5 of Development Consent DA 374-11-00, a CCC has been established. The CCC will be operated in accordance with the *Community Consultative Committee Guidelines for State Significant Projects 2023* (DPE, 2023).

CCC meetings will occur at least every six months prior to the re-commencement of construction at the Project and the frequency will increase to quarterly once construction has re-commenced.

SEM Website

In accordance with Condition 12, Schedule 5 of Development Consent DA 374-11-00, the SEM website will be maintained as a tool for the provision of information to stakeholders and interested parties regarding the operation and environmental performance of the Project. The following information will be available on the SEM website:

- the *Syerston Nickel Cobalt Project Environmental Impact Statement* (Project EIS) (Black Range Minerals, 2000) and subsequent environmental approval documentation (e.g. modifications to Development Consent DA 374-11-00);
- current statutory approvals for the development (i.e. Development Consent DA 374-11-00, Mining Lease 1770 and EPL 21146);
- approved strategies, plans or programs required under the conditions of Development Consent DA 374-11-00;
- a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of Development Consent DA 374-11-00 (the Annual Review (Section 7.1) will be placed on the SEM website to address this requirement);
- a complaints register, which is updated on a monthly basis;
- any independent environmental audit, and SEM's response to the recommendations in any audit; and
- any other matter required by the Planning Secretary.

Information available on the SEM website will be updated as required by Development Consent DA 374-11-00.

For community members without access to the SEM website, SEM will provide a hardcopy of relevant documents available on the SEM website to community members on request.

Internal Communication

Environmental management documentation developed and retained by SEM will be filed in accordance with the document register and made available to relevant SEM employees and contractor staff.

Environmental management and performance will be communicated to staff, contractors and visitors through:

- toolbox training, formal training, memos, weekly/daily planning meetings;
- induction and orientation processes;
- incident or near miss communications;
- site inspections and auditing; and
- communication sessions.

Relevant Agencies

SEM will notify relevant agencies in accordance with the requirements of Development Consent DA 374-11-00, including incident reporting (Section 8.1).

5.4 DISPUTE RESOLUTION

SEM has a dispute resolution process (see Figure 4).

The Community Relations Superintendent and/or the Environmental, Approvals & Community Lead (or nominated delegate depending on the nature of the dispute) will work with subject matter experts and the leadership team to resolve disputes with community members internally and as quickly as possible. If the dispute cannot be resolved internally, either party may refer the matter to the Planning Secretary for resolution.

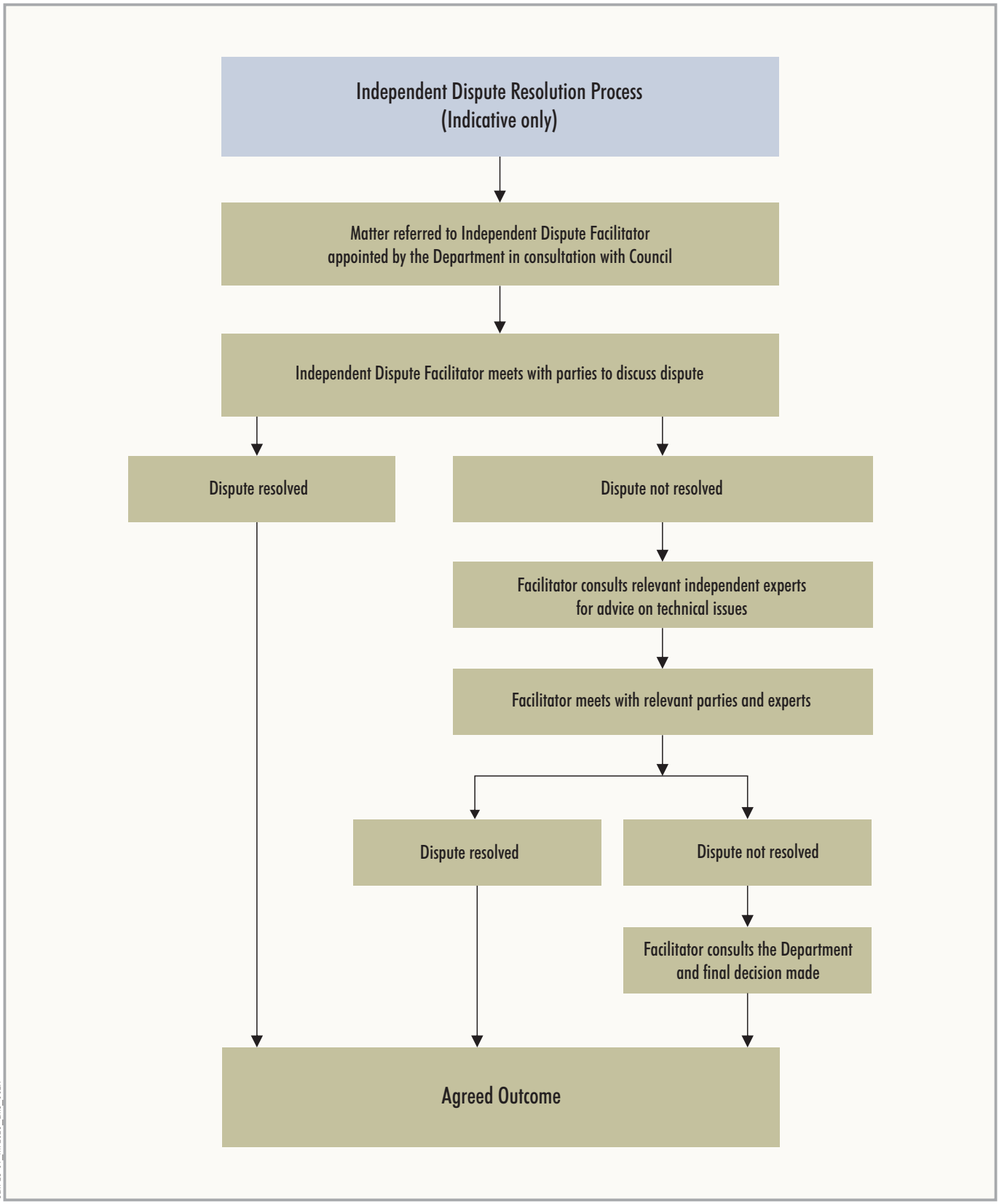
5.5 RECORDS MANAGEMENT

A copy of any document that includes data or records will be kept and maintained by SEM to demonstrate compliance with relevant legislation, leases, licences, approvals, and any other document that governs operations at the Project. The Environmental, Approvals & Community Lead will be responsible for the management of any necessary environmental records.

5.6 TRAINING

It is the responsibility of SEM to employ people that are appropriately trained, competent and have an appropriate level of experience and understanding to undertake their work in a manner that minimises impacts on the environment and community. In addition, a component of the site-specific induction is to promote and provide all employees and contractors with general environmental awareness training.

A register of training records and competencies will be maintained and kept up to date in a Project Training Register.



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sunrise energy metals

Sunrise Scandium-Nickel-Cobalt Mine

Independent Dispute Resolution Process

Figure 4

Visitors Induction

Visitors to the Project will undergo a visitor's induction, which will outline the overarching environmental, health and safety requirements. The nominated SEM contact will be responsible for the actions and conduct of their visitors and will reinforce the Project's environmental requirements.

At all times, visitors will be under the supervision of a fully inducted SEM employee.

Site Induction

Prior to commencing any work duties on site, all personnel will undergo a site-specific project induction. The site-specific induction includes a detailed summary of the Project as well as associated health, safety, environment and community requirements. The induction also includes a comprehensive understanding of the Project's environmental impacts and aspects with a focus on the relevant legislation and legal responsibilities applicable to site.

Task Specific Training

Occasions may arise where employees or contractors are required to undertake training in specific environmental management duties (i.e. use of air quality monitoring equipment, or use of real-time response protocols). A training needs analysis will identify where these instances occur.

6 MONITORING, ECOLOGICAL AND COMMUNITY OBJECTIVES AND CUMULATIVE ENVIRONMENTAL IMPACTS

6.1 MONITORING PROGRAMS

Monitoring will be conducted for a range of parameters to satisfy the requirements of Development Consent DA 374-11-00. Details of the monitoring programs developed for the Project are included in each EMP (e.g. the air quality monitoring program is detailed in the Air Quality and Greenhouse Gas Management Plan), and are briefly summarised in Table 5 below. Monitoring will be conducted in accordance with relevant statutory requirements and undertaken by suitably experienced and capable personnel where relevant.

A summary of the Project environmental monitoring sites is shown on Figures 5 and 6.

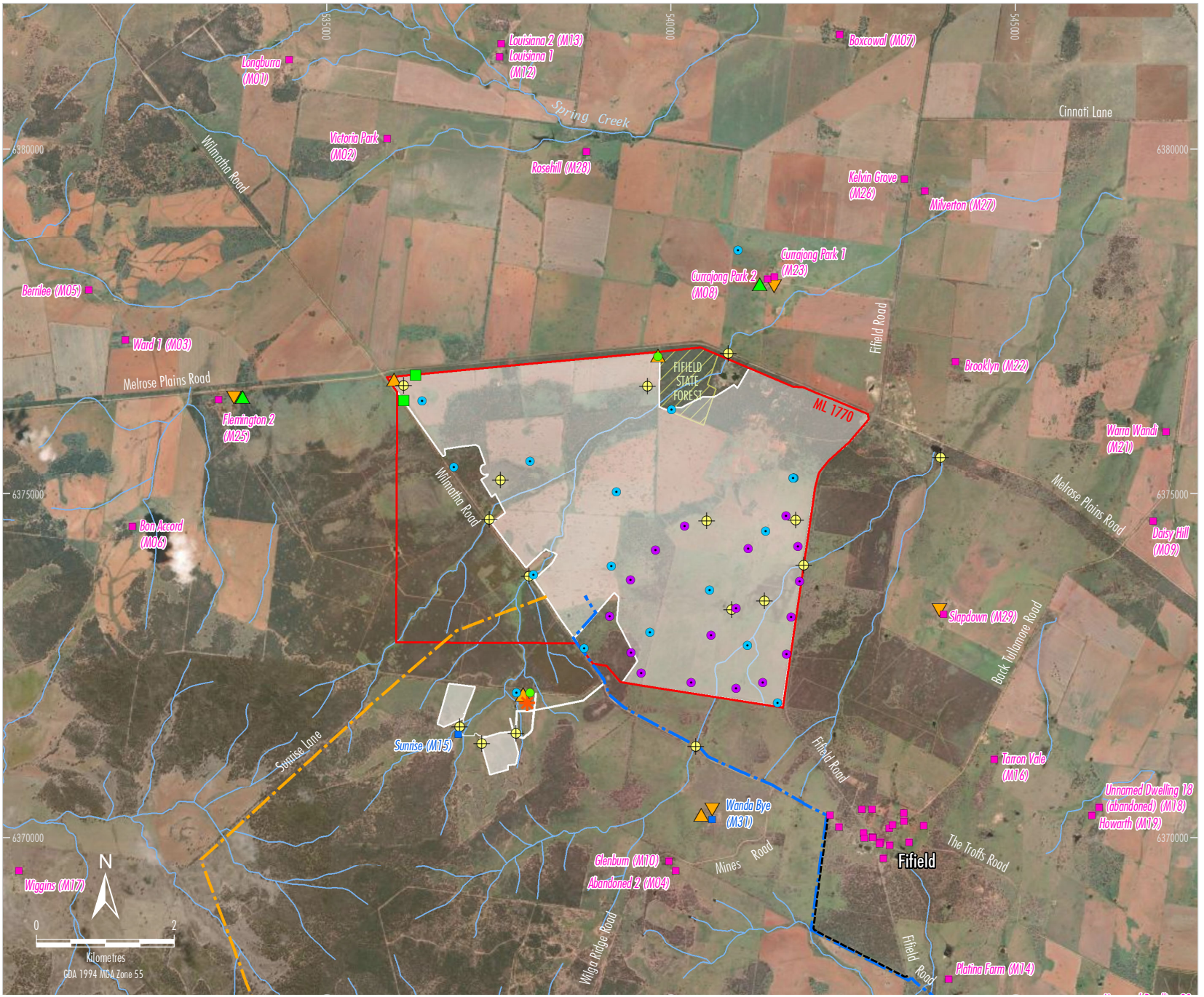
Table 5
Summary of the Mine and Processing Facility Environmental Monitoring Programs

Environmental Management Plan	Monitoring Parameter
Air Quality and Greenhouse Gas Management Plan	• Dust deposition • PM_{10} and $PM_{2.5}$. • Meteorological.
Noise Management Plan	• Noise. • Meteorological.
Blast Management Plan	• Blast plumes • Vibration • Overpressure • Visual (blast fumes).
Surface Water Management Plan	• Surface water quality.
Groundwater Management Plan	• Groundwater quality. • Groundwater level.
Rehabilitation Management Plan	• Rehabilitation monitoring, including: – Landscape Function Analysis; – Landscape Organisation Index; – Soil Surface Assessment; – Vegetation Dynamics; and – Visual monitoring.

6.2 ECOLOGICAL AND COMMUNITY OBJECTIVES

SEM's ecological and community objectives are included in the Sustainability Policy available on the SEM website and provided in Appendix A. These include:

- focus on hazard identification and management of risks to our people, the environment and communities in which we operate;
- design, construct and operate our projects to mitigate or remove environmental impacts, minimise our use of energy and natural resources and remediate any environmental impact of our activities;
- build relationships and work in a spirit of togetherness with the people and organisations in the areas in which we operate. These relationships are based on mutual respect, open and transparent dealings and lasting commitment; and
- share our values, foster value creation and help our host communities thrive beyond us.



LEGEND

- State Forest
- Mining Lease Boundary (ML)
- Approved Surface Development Area
- Gas Pipeline
- Water Pipeline
- Fifield Bypass
- Mine-owned Dwelling
- Dwelling

Construction Phase Monitoring Sites

- Dust Deposition Monitoring Site
- $PM_{2.5}$ and PM_{10} Monitoring Site
- Meteorological Station
- Noise Monitoring Site
- Construction Phase Blast Monitoring Site
- Indicative Construction Phase
- Blast Monitoring Site (Infrastructure)*
- Groundwater Monitoring Site
- Proposed Groundwater (Piezometer) Monitoring Site
- Surface Water Quality Monitoring Site

* Blast Monitoring would be undertaken in proximity to the closest public infrastructure to blasting activities.

Source: Sunrise Energy Metals (2021); Clean TeQ (2017, 2019); Black Range Minerals (2005); NSW Spatial Services (2022) Aerial Imagery: Esri, Maxar, Earthstar Geographics, and the GIS User Community (2024)

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Mine and Processing Facility Environmental Monitoring Sites

Figure 5

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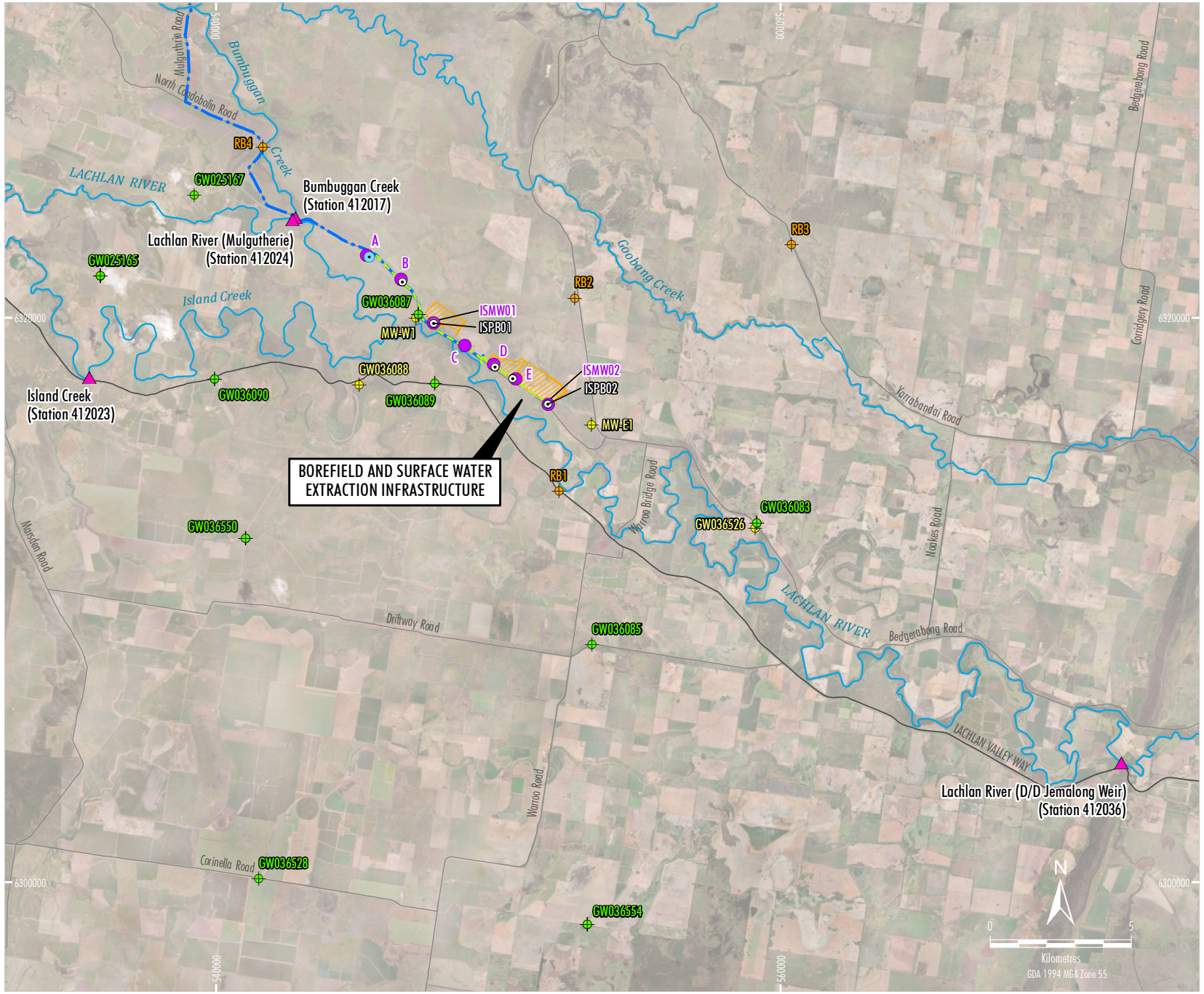

LEGEND

- Water Pipeline
- Borefield Infrastructure Corridor *
- Borefield Location
- Production Bore (not constructed)
- Production Bore (constructed)
- Borefield Monitoring Piezometer (constructed)
- Regional Monitoring Bore (Existing)
- Regional Trigger Level Monitoring Bores (Existing)
- Regional Monitoring Bore (Proposed) ^
- Surface Water Flow Gauge

* Infrastructure Corridor includes linking pipline, access road and electricity transmission line.

^ Indicative Location Only – Location to be confirmed in consultation with Natural Resources Access Regulator and relevant landholders.

Source: Sunrise Energy Metals (2021); Ivanplats Syerston (2005); NSW Spatial Services (2022); NSW DPI - Water (2018)
Aerial Imagery: Esri, Maxar, Earthstar Geographics, and the GIS User Community (2024)

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Sunrise Scandium-Nickel-Cobalt Mine

Groundwater Monitoring Program - Borefield

Figure 6

Rehabilitation

SEM's strategy for the restoration and management of the areas affected by the Project, including elements such as creek lines and drainage channels, is outlined in the Biodiversity Management Plan and Revegetation Strategy (Appendix C) and will be included in the Rehabilitation Outcome Documents. These management plans are consistent with the Project's ecological and community objectives outlined above.

The rehabilitation principles for the Project, include:

- Preservation of areas of existing vegetation outside the approved surface development area.
- Rehabilitation of mine landforms will be progressive and conducted in accordance with approved plans (i.e. Rehabilitation Outcome Documents).
- The newly prepared (i.e. topsoiled) landforms will be protected via the construction of moisture-retaining passive drainage systems, water-holding structures (e.g. surface depressions) and, where appropriate, the use of authorised hybrid cover crops to provide initial erosion protection.
- Revegetated landforms will form an expansion of, and be continuous with, existing woodland areas.
- Outer embankments of the tailings storage facility will be rehabilitated progressively during operational years.
- Livestock will be excluded from rehabilitated areas where agriculture is not the final land use.
- Rehabilitation concepts should be flexible and allow for adjustments, based on trials.

Community

Community objectives for the Project include:

- ensure employees and contractors are informed about SEM's policies and are made aware of their environmental and community responsibilities in relation to SEM's activities;
- inform the community of SEM's activities and consult with the community in an open and honest fashion in relation to SEM's projects;
- address complaints/conflicts and consult to achieve mutually acceptable outcomes; and
- provide opportunities to share in the benefits that flow from SEM's activities.

6.3 CUMULATIVE ENVIRONMENTAL IMPACTS

As described in the Project EIS (Black Range Minerals, 2000) and subsequent environmental assessment documents prepared in support of the approved modifications to the Project, the lack of other mining/industrial activities in the vicinity of the Project components limits the potential for material cumulative environmental impacts (i.e. no material cumulative impacts have been identified).

Notwithstanding, the management and mitigation measures described in each EMP have been developed in consideration of potential cumulative environmental impacts.

As part of the regular reviews of each EMP, any new developments in the vicinity of the Project will be considered and if cumulative impacts are identified, procedures for the management and mitigation of these cumulative impacts will be incorporated into the EMPs. These may include:

- working with neighbouring operations with regards to the management of cumulative impacts such as blast fume, dust, noise, lighting and social issues;
- sharing monitoring data with neighbouring operations and on the SEM website; and
- engaging in a stakeholder consultation program that identifies community concerns about cumulative impacts from local operations.

7 CONTINGENCY PLAN

In the event a performance measure for the Project (detailed in the relevant environmental management plans) may not have been met or a performance indicator is considered to have been exceeded, SEM will implement the following Contingency Plan:

- SEM will report the incident in accordance with Section 12.
- SEM will apply adaptive management (Section 7.1).
- SEM will identify the appropriate course of action with respect to the identified impact(s), in consultation with technical specialists, DPHI and other relevant government agencies, as necessary.
- SEM will submit a report describing the proposed course of action to DPHI for approval.
- SEM will implement the approved course of action to the satisfaction of DPHI.

7.1 ADAPTIVE MANAGEMENT

In accordance with Condition 3, Schedule 5 of Development Consent DA 374-11-00, SEM will assess and manage risks to comply with the criteria and/or performance measures outlined in Schedule 3 of Development Consent DA 374-11-00.

Where any exceedance of these criteria and/or performance measures occurs, at the earliest opportunity SEM will:

- take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;
- consider all reasonable and feasible options for remediation and submit a report to the DPHI describing these options and preferred remediation measures; and
- implement remediation measures as directed by the Planning Secretary.

8 REVIEW AND IMPROVEMENT OF ENVIRONMENTAL PERFORMANCE

A list of EMPs required for the Project is provided in Table 2. These plans/strategies will be reviewed, and if necessary, revised within three months of the submission of an annual review, incident report, independent audit or any modification to Development Consent DA 374-11-00, in accordance with Condition 6, Schedule 5 of Development Consent DA 374-11-00. Table 6 summarises the EMS reporting and review requirements.

Table 6
Project Reporting Requirements

Report	Frequency	Distribution	Distribution Method	Responsibility for Data Collection, Preparation and Submissions
Environmental Incident Report	As required – see Section 8.1	DPHI Other relevant agencies including the relevant Council	Email	Preparation and submission by the Environment, Approvals & Community Lead
Annual Review (incorporating Annual Environmental Management Report)	Annually (by 9 March each year)	DPHI and Resources Regulator	Email and Website	Preparation and submission by the Environment, Approvals & Community Lead
Annual Return	Annually (by 9 March each year)	EPA	Email and Post	Preparation and submission by the Environment, Approvals & Community Lead
Independent Environmental Review	Within one year of commencement, and then every three years	DPHI Other relevant agencies	Email and Website	Preparation by a suitably qualified, experienced and independent person who is approved by the Planning Secretary Submission by the Environment, Approvals & Community Lead

8.1 ANNUAL REVIEW

In accordance with Condition 5, Schedule 5 of Development Consent DA 374-11-00, SEM will review the environmental performance of the Project by the end of March each year (for the previous calendar year) to the satisfaction of the Planning Secretary.

In relation to environmental management, the Annual Review will (where relevant):

- describe the development (including any rehabilitation) that was carried out in the past calendar year, and the development that is proposed to be carried out over the current calendar year;
- include a comprehensive review of the monitoring results and complaints register of the development over the past year, which includes a comparison of these results against the:
  - relevant statutory requirements, limits or performance measures/criteria;
  - monitoring results of previous years; and
  - relevant predictions in the Project EIS;

- identify any non-compliance over the past year, and describe what actions were (or are being) taken to comply;
- identify any trends in the monitoring data over the life of the development;
- identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
- describe what measures will be implemented over the next year to improve the environmental performance of the development.

Based on consideration of the above points, the Annual Review will determine the effectiveness of relevant management measures implemented at the Project.

The Annual Review will be made publicly available on the SEM website.

8.2 INDEPENDENT ENVIRONMENTAL AUDIT

In accordance with Condition 10, Schedule 5 of Development Consent DA 374-11-00, an independent environmental audit of the Project will be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary. The audit will be prepared in accordance with the relevant *Independent Audit Post Approval Requirements* (Department of Planning, Industry and Environment, 2020) (or its latest version) and include consultation with the relevant agencies (DPHI).

The independent environmental audit will assess the environmental performance of the Project and assess whether the Project is complying with the requirements of Development Consent DA 374-11-00. In addition, the independent environmental audit will assess the adequacy of this EMS and, if necessary, appropriate measures or actions to improve the environmental performance of the Project or this EMS will be recommended.

An independent environmental audit will be conducted within one year of the commencement of the development under this consent, after 6 May 2017, and every 3 years thereafter, unless the Planning Secretary directs otherwise.

In accordance with Condition 11, Schedule 5 of Development Consent DA 374-11-00, within 3 months of commissioning the independent environmental audit, or as otherwise agreed by the Planning Secretary, SEM will submit a copy of the independent environmental audit report to the Planning Secretary, together with its response to any recommendations contained in the independent environmental audit report.

The independent environmental audit, and SEM's response to the recommendations in the audit, will be made publicly available on the SEM website, in accordance with Condition 12, Schedule 5 of Development Consent DA 374-11-00.

9 REPORTING PROTOCOLS

In accordance with Condition 4(g), Schedule 5 of Development Consent DA 374-11-00, SEM has developed protocols for managing and reporting the following:

- incidents;
- complaints;
- non-compliances with statutory requirements; and
- exceedances of the impact assessment criteria and/or performance criteria.

These protocols are described in detail in this section. In accordance with Condition 9, Schedule 5 of Development Consent DA 374-11-00, SEM will provide regular reporting on the environmental performance of the Project on the SEM website.

9.1 INCIDENT REPORTING

An incident is defined as a set of circumstances that causes or threatens to cause material harm to the environment and/or breaches or exceeds the limits or performance measures/criteria in Development Consent DA 374-11-00.

In the event that review of monitoring data indicates an incident has occurred, the incident will be reported in accordance with Condition 8, Schedule 5 of Development Consent DA 374-11-00. The Planning Secretary will be notified in writing via the Major Projects website immediately after SEM becomes aware of an incident. The notification will identify the Project name and development application number, and set out the location and nature of the incident.

Subsequent notification will be given and reports submitted in accordance with the requirements set out in Appendix 6 of Development Consent DA 374-11-00. A written incident notification addressing the requirements set out below will be submitted to the Planning Secretary via the Major Projects website within seven days after SEM becomes aware of an incident. Written notification of an incident will:

- identify the development and application number;
- provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- identify how the incident was detected;
- identify when SEM became aware of the incident;
- identify any actual or potential non-compliance with conditions of consent;
- describe what immediate steps were taken in relation to the incident;
- identify further action(s) that will be taken in relation to the incident; and
- identify a project contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, SEM will provide the Planning Secretary, relevant councils, and any other relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested by the Planning Secretary.

- a summary of the incident;
- outcomes of an incident investigation, including identification of the cause of the incident;
- details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- details of any communication with other stakeholders regarding the incident.

9.2 COMPLAINTS

SEM will maintain a Community Complaints Line (tel: 1800 952 277) and email address (community@sunriseem.com) for the sole purpose of receiving community contacts and complaints. The Community Complaints Line number will be available on the website and included in SEM's advertising and community communication tools. The Community Complaints line will be staffed 24 hours a day, seven days a week during construction and operations. SEM will respond to callers on the next business day. If the issue is urgent a member of the leadership team will be contacted immediately.

SEM has developed a procedure (Figure 7) that outlines its commitment to receiving, resolving and recording complaints received from the community. Detailed records of each complaint resolution are kept in SEM's record management systems.

Complaints will be investigated within 24 hours of receipt. The cause of the complaint will be analysed and actions to resolve the complaint taken as soon as possible. In complex cases where resolution will take more than 48 hours, SEM will commit to update the community member regularly until the complaint is resolved.

In accordance with Condition 12(a), Schedule 5 of Development Consent DA 374-11-00, a complaints register will be made available on the SEM website and updated monthly.

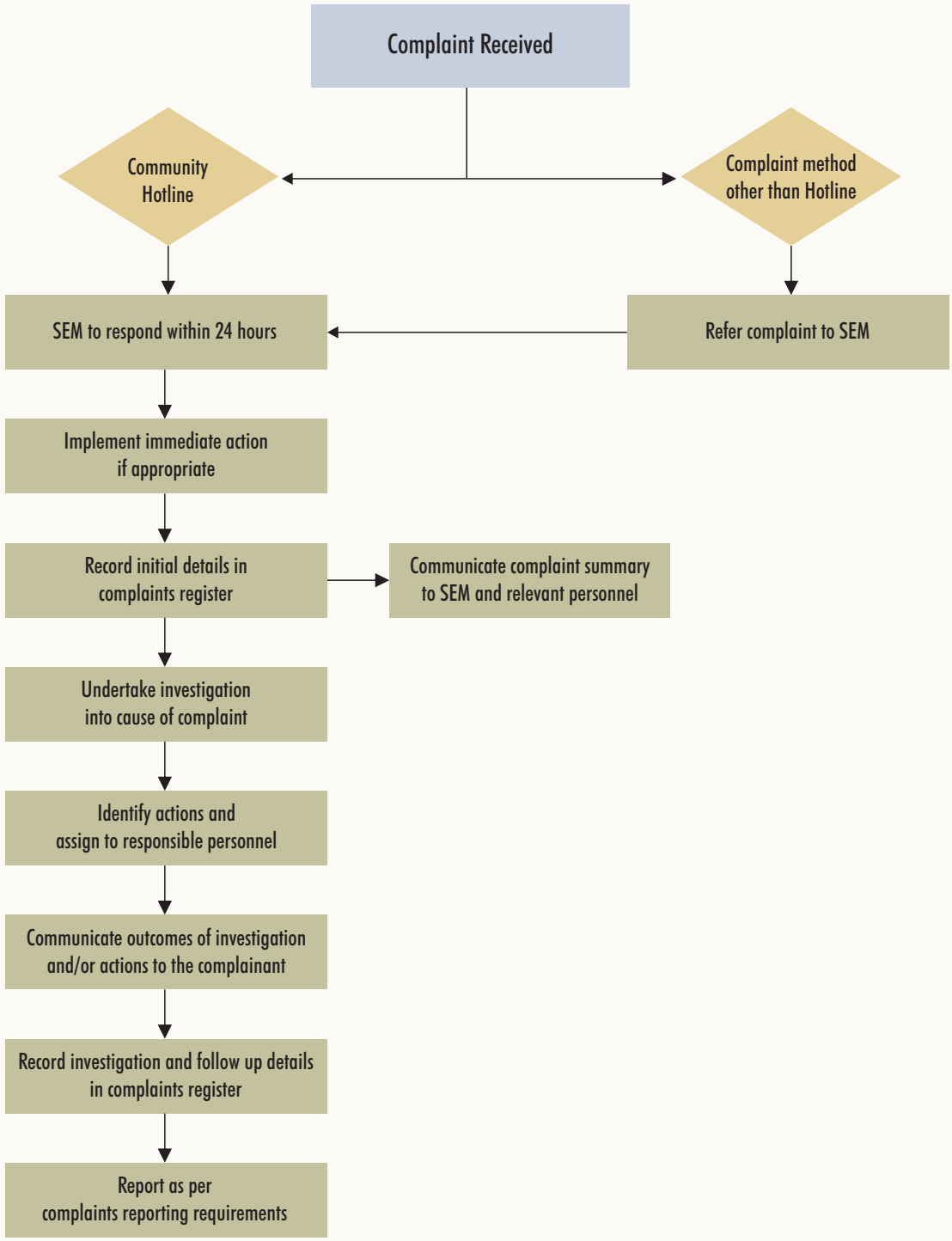
9.3 NON-COMPLIANCE WITH STATUTORY REQUIREMENTS

A protocol for managing and reporting non-compliances with statutory requirements has been developed as a component of SEM's EMS and is described below.

Compliance with all approved plans and procedures is the responsibility of all personnel (staff and contractors) employed on or in association with SEM and the Project.

SEM will undertake regular inspections, internal audits and initiate directions identifying any remediation/rectification work required, and areas of actual or potential non-compliance.

Section 5.1 of the Surface Water Management Plan and Groundwater Management Plan include surface water and groundwater impact trigger levels for the Project.



SEM-25-01_IMP2026_EMS_003A

Sunrise Scandium-Nickel-Cobalt Mine

Community Complaints Response Process

Figure 7

As described in Section 8.1, SEM will report incidents in accordance with Condition 8, Schedule 5 of Development Consent DA 374-11-00.

A review of compliance with all conditions in Development Consent DA 374-11-00 and Mining Lease 1770 will be undertaken prior to (and included within) each Annual Review (Section 7.1).

Additionally, in accordance with Condition 10, Schedule 5 of Development Consent DA 374-11-00, an independent environmental audit (Section 7.2) will be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary to assess whether SEM is complying with the requirements in Development Consent DA 374-11-00.

9.4 EXCEEDANCES OF IMPACT ASSESSMENT CRITERIA AND/OR PERFORMANCE CRITERIA

A protocol for managing and reporting exceedances of impact assessment criteria and/or performance criteria is provided in each Project environmental management plan.

9.5 ACCESS TO INFORMATION

In accordance with Condition 12, Schedule 5 Development Consent DA 374-11-00, SEM will make the following information publicly available on its website as relevant to the stage of the development:

- the Project EIS (as specified in the Definitions section of Development Consent DA 374-11-00);
- current statutory approvals for the development;
- approved strategies, plans or programs required under the conditions of the consent;
- a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of the consent;
- a complaints register, which is to be updated on a monthly basis;
- any independent environmental audit, and SEM's response to the recommendations in any audit;
- any other matter required by the Planning Secretary; and
- keep this information up to date, to the satisfaction of the Planning Secretary.

10 REFERENCES

Black Range Minerals (2000) *Syerston Nickel Cobalt Project Environmental Impact Statement. October 2000.*

Department of Planning and Environment (2023) *Community Consultative Committee Guidelines for State Significant Projects 2023*.

Department of Planning, Industry and Environment (2020) *Independent Audit Post Approval Requirements*

APPENDIX A
SUSTAINABILITY POLICY

20 May 2024

Sustainability Policy

Sunrise Energy Metals' vision is to create a sustainable, long-term, value-creating business through positive innovation and disruptive change.

Three values underpin everything we do:

Invested – We achieve positive outcomes for all our stakeholders. We are committed to creating and sustaining value from our assets and core technologies.

Connected – We actively interact to leverage our combined capabilities to deliver better solutions.

Prepared to be different – We have the courage to pursue excellence and are prepared to do things differently to add value, while managing the risks in our business.

Reflecting our commitment to generate long-term sustainable value for our key stakeholders including our shareholders, the people who work at our sites and the local communities which host our operations, we will:

- Ensure the commitments defined in our Sustainability Policy are applied in all business planning and decision-making processes.
- Build a strong and positive safety culture based on visible leadership, ongoing training and access to the right tools and equipment. We aspire to create a workplace that ensures everyone goes home safe and well, every day. The contribution of all members of our organisation is essential to building this culture.
- Implement robust management systems across our businesses, with a commitment to continual improvement.
- Focus on hazard identification and management of risks to our people, the environment and communities in which we operate.
- Design, construct and operate our projects to mitigate or remove environmental impacts, minimise our use of energy and natural resources, and remediate any environmental impact of our activities. We respect the conservation of biodiversity.
- Meet or exceed the regulatory requirements in the areas in which we work.
- Deliver the highest possible quality products and services.
- Build relationships and work in a spirit of togetherness with the people and organisations in the areas in which we operate. These relationships are based on mutual respect, open and transparent dealings and lasting commitment.

Sunrise Energy Metals Limited (ACN 127 457 916)
L6, 10 Queen St, Melbourne VIC 3000
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info@sunriseem.com | sunriseem.com

- Share our values, foster value creation and help our host communities thrive beyond us.
- Provide equal opportunity and create a diverse work environment in which everyone is treated fairly, with respect and can reach their potential.

We verify the implementation of these commitments through regular review.

Sam Riggall

Managing Director and CEO

20 May 2024

APPENDIX B

SITE ENVIRONMENTAL MANAGEMENT – ROLES AND RESPONSIBILITIES

Table B1
Site Environmental Management – Roles and Responsibilities

Role	Responsibility
Health, Safety and Environment Manager	• Perform in an overview role to provide strategic direction. • Provide adequate resources to implement and support the requirements of the EMS. • Ensure overall compliance of the Project with legislation and approvals. • Provide support for the development of strategies, systems and plans to address all legal requirements associated with the Project.
Department Managers	• Assess environmental aspects and impacts of the operation during mine planning process and during the risk assessment process. • Coordinate activities under their supervision in accordance with the EMS and related sub-plans, procedures, and programs. • Consider past environmental performance when engaging contractors. • Participate in reviews of the EMS.
General Manager Government, External Relations and Community	• Assist with the response to incidents. • Assist with the notification and reporting of incidents. • Manage external government and community consultation.
Environment, Approvals & Community Lead	• Responsible for obtaining necessary environmental approvals. • Coordinate the development, communication and maintenance of EMPs.
	• Manage the implementation of EMPs, approvals, licences and permits. • Manage internal auditing and regulatory reporting (including the Annual Review). • Manage and drive progressive rehabilitation planning, development and reporting. • Support staff environmental training. • Develop corrective action management plans for any non-compliance in consultation with the relevant area manager. • Coordinate the implementation of management plans and environmental monitoring programs and regularly review environmental monitoring data for compliance with relevant criteria.
Department Supervisors	• Responsible for implementation and compliance with EMPs. • Provide support for Environmental, Approvals & Community Lead's responsibilities. • Provide support and advice to the operation including department managers and general staff and contractors. • Undertake regular site inspections and audits to maintain compliance with the EMPs and legislative requirements relating to the Project. • Oversee activities undertaken at the Project to assist in managing environmental aspects in accordance with the Project management and legislative requirements. • Implementation of corrective actions arising from environmental incidents and audit. • Coordinate the activities of specialist sub-consultants and project personnel for environmental assessment/monitoring/auditing responsibilities in accordance with the Project Management Systems.
Safety and Training Department	• Maintain the Emergency Response Team. • Maintain records of training. • Maintain Emergency Response Plans. • Maintain chemical registers.

Table B1
Site Environmental Management – Roles and Responsibilities (Continued)

Role	Responsibility
All Employees and Contractors	• All general employees trained in environmental procedures and protocols as part of the induction process and regular site meetings. • All general employees responsible for immediately reporting environmental incidents. • All general employees responsible for undertaking works in an environmentally sound manner and in accordance with EMPs and site commitments.

APPENDIX C

ENVIRONMENTAL MANAGEMENT PLANS REQUIRED UNDER DEVELOPMENT CONSENT DA 374-11-00

[*Available on the Sunrise Energy Metals website*]
[https://www.sunriseem.com/sunrise-project/management-plans/]

APPENDIX D

SUMMARY OF RELEVANT MANAGEMENT MEASURES

Table D1
Summary of Relevant Management Measures

Environmental Management Plan	Management Measures
Air Quality and Greenhouse Gas Management Plan	**Air Quality** • Minimising disturbance areas. • Cleared areas will be watered, as required. • Where surface development areas are not required for ongoing operational activities, interim rehabilitation will be completed where necessary to minimise the area exposed for dust generation, if practicable. • Long-term stockpiles will be revegetated as soon as practicable following completion. • Water carts will be used on stockpile areas to minimise dust generation as necessary. • Roads will be constructed in a proper manner and consideration will be given to constructing all major haul roads using material with low silt/fines content. • Speed limits will be imposed on all roads. • Water carts will be utilised as necessary to minimise excessive visible dust. **Greenhouse Gas** • Minimise the re-handling of material. • Maintain the mobile fleet in good operating order. • Optimise the design of roads to minimise the distance travelled between working areas.
Noise Management Plan	• SEM will implement reasonable measures (e.g. operational changes and temporary cessation of relevant works) to minimise the potential noise impacts of the Project when noise-enhancing meteorological conditions are present. • All plant, vehicles and machinery used on-site will be maintained regularly to minimise noise generation. • All plant and machinery used on-site will be operated in a proper and efficient manner (e.g. at correct speed) to minimise noise generation. • Lesser noise generating construction activities (e.g. welding and electrical works) will be conducted during the evening/night-time period. • Regular communication and updates will be provided to local residents on the status and nature of site construction activities. • In the event of a complaint from a local resident, SEM will implement the complaints response process. • Operation of shuttle buses to transport employees to and from the mine site during construction and operational phases of the Project. • Project-related heavy vehicle movements will be staggered and movements during night-time will be minimised where practicable.
Heritage Management Plan	• Avoidance of Aboriginal cultural heritage sites where practicable, if not able to be avoided, sites will be subject to site recording and collection. • Temporary protective fencing around the sites as required prior to any surface disturbance activities occurring in their vicinity to avoid any inadvertent disturbance.

Table D1 (Continued)
Summary of Relevant Management Measures

Environmental Management Plan	Management Measures
Biodiversity Management Plan and Revegetation Strategy	• Approval of a Ground Disturbance Permit prior to the commencement of direct ground disturbance activities. • Clearance of potential habitat will be minimised via the Vegetation Clearance Protocol. • Implementation of all practicable measures to protect threatened species. • Implementation of weed control strategies. • Implementation of feral animals control measures. • Visual monitoring of revegetation will be conducted on a regular basis.
Blast Management Plan	• Training of relevant personnel on blast-related obligations and explosives management. • Monitoring all blasts. • Design of all blasts to comply with relevant overpressure and vibration criteria. • Implementation of procedures to mitigate blast fumes. • Development of a blast records system. • Establishment of minimum blast exclusion zone. • Assessment of meteorological conditions. • Blasting will be conducted during daytime hours. • Blast hole stemming to prevent venting of gases.
Water Management Plan	• Design of water storage facilities to ensure no discharge of mine water off-site. • Seepage interception system to be designed and installed. • Sediment control structures such as sediment dams and sediment fences will be employed where necessary within and downstream of disturbance areas. • The water management system will be progressively developed during the construction and operation phases as diversion and containment requirements change.

Table D1 (Continued)
Summary of Relevant Management Measures

Environmental Management Plan	Management Measures
Traffic Management Plan	• Where practicable, temporary traffic controls will be implemented outside of peak traffic hours to minimise disruption to road users. • Prior to commencement of works, SEM will obtain required permits and approvals. • Implement the Road Transport Protocol. • Operation of shuttle buses to transport employees to minimise employee movement and reduce driver fatigue. • Project-related vehicles will be well maintained. • Prior to the commencement of events and festivals, SEM will determine appropriate strategies to minimise potential impacts from Project-related traffic movements. • Schedule construction material requirements so that materials can be delivered in larger quantities (i.e. smaller number of larger loads rather than a larger number of smaller loads). • Combine deliveries from similar sources. • Operate high capacity trucks to transport materials to and from the site.
Road Upgrade and Maintenance Strategy	• Design plans to be approved by the Parkes Shire Council, Lachlan Shire Council, Forbes Shire Council and Transport for NSW.