Rehabilitation Management Plan

Summary table

Name of Mine	Arumpo Bentonite Mine Site
Rehabilitation Management Plan commencement date	1st July 2022
Rehabilitation Management Plan revision date and Version number	1st October 2025, Version 5
Mining Lease numbers and expiry dates	ML 1507 (Expiry date 18/03/2044) ML1766 (Expiry date 21/12/2038)
Name of Lease Holder	Arumpo Bentonite Pty Ltd
Date of submission	15th October 2025 with a minor update on 29th October 2025 (seed list).

1.Part 1- Introduction to mining project

1.1 History of operations

The existing mining and mining-related activities commenced in 1995 and have been undertaken on a seasonally determined campaign basis since that time, initially from within four mineral claims which allowed Arumpo Bentonite to undertake relatively low-cost, small-scale production of Bentonite and to test the product and develop markets. Having achieved this Arumpo Bentonite converted the Mineral Claims into a Mining Lease. The granting of the mining lease caused the cancellation of the Mineral Claims and has enabled a long-term strategic mining plan to be implemented for the progressive mining, stockpiling and sun drying of product and progressive rehabilitation of pits over a larger area of the identified resource.

Assessment Lease 5 was granted to Arumpo Bentonite commencing on the 25th April 2002 and expired in 2017.Exploration Licence 5360 expired in October 2005 and was replaced by Assessment Lease 35 in 2012. In 2014 there was a reassessment of the Arumpo tenements and AL 35 was relinquished and AL 5 reduced in size.

In 2107 a new SOEE was completed along with a new MLA which was granted as ML 1766 on the 21st of December 2017. This is the third MOP for the mine and the first to cover the expanded project area. A DA Amendment was also granted by the Wentworth Shire to cover the new project area.

ML 1507 and ML 1766 are the remaining tenements left of a larger project area encompassing several previous titles. The project hosts the Arumpo Bentonite deposit and mining operation in far western NSW. Figure 1 shows the general location of the Project.

1.2 - Current Consents, Authorisations and Licences

Mining Licences:	ML1507 (20/03/2002 – 19/3/2023) ML1677 (21/12/2017 – 20/12/2038)
Development Consent:	Wentworth Shire DA S96/2017/044 (19/07/2017)
EPA Licence:	EPA 10614 (19/4/2002, amended 2017)
Landowner Agreement:	Compensation Agreement with Ken & Daryl Sue (Arumpo Station)
SOEE:	February 2017

1.3 Land Ownership & Land Use

The Mine Site is located within the Wentworth Local Government Area, approximately 80km northeast of Buronga along Arumpo Road. The Mine Site is situated wholly within Lot 1134, DP 762469 on Arumpo Station, which is leased by Messrs Ken and Darryl Sue from the Department of Industry - Lands under Western Lands Lease 1134. Access to the Mine Site is via an approximately 8.5km Mine Access Road that intersects with Arumpo Road. All tracks and roads within the project area, including the Access Road, are ungazetted station tracks. The property is used for wheat production and sheep grazing. The intention is to return the land to a form suitable for grazing.

The project predates and borders the Willandra Lakes World Heritage Area and does not affect this

area, except for the Mine Access Road which was in place at the time of the gazettal of the WLWHA.

Land Tenure	Lease Holder	Mining Leases
WLL Lease 1134	D. Sue	ML1507 and ML1766

1.3.1 Land Ownership & Land Use figure

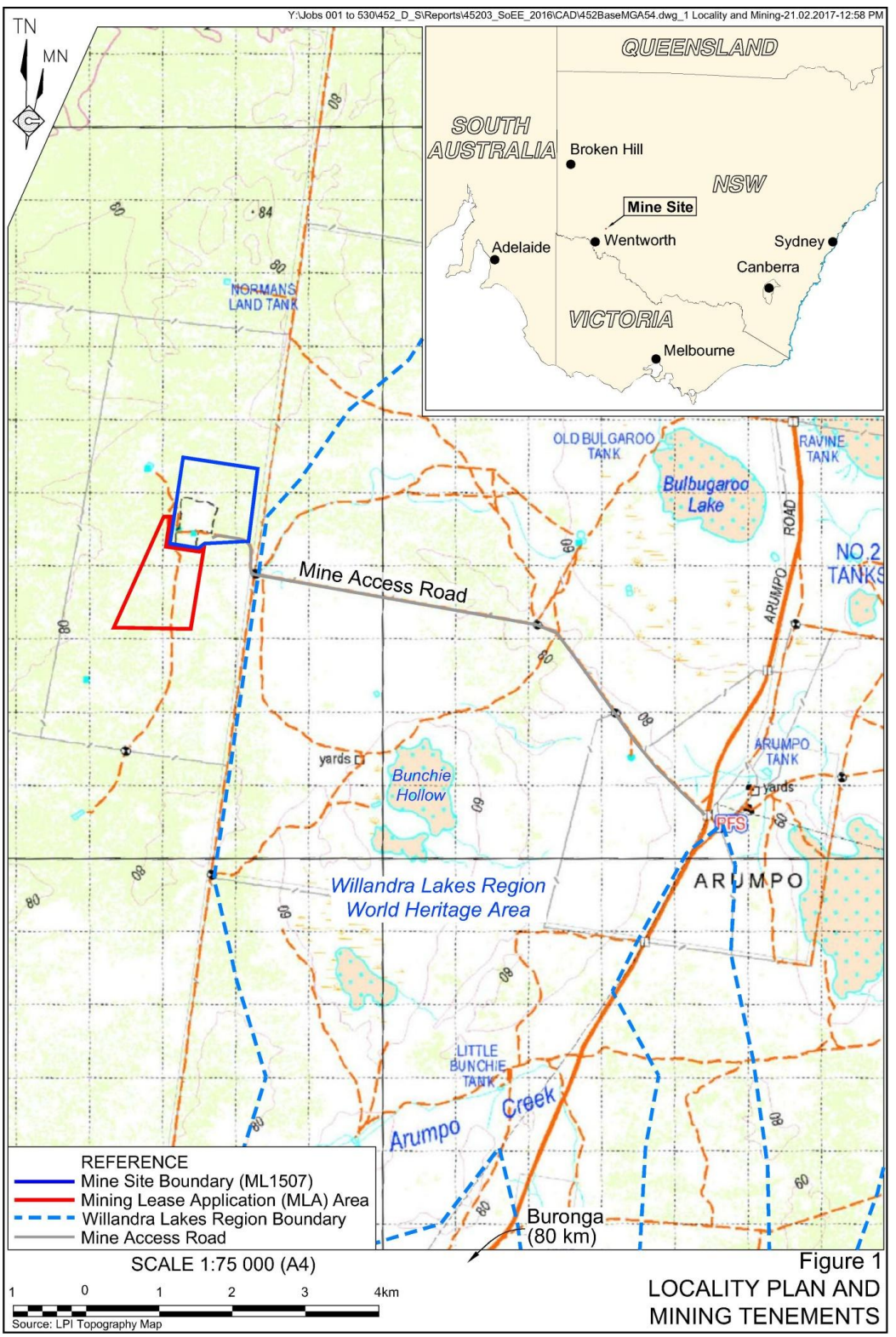


Figure 1
LOCALITY PLAN AND MINING TENEMENTS

2. Part 2 – Final Land use

2.1 Regulatory requirements for rehabilitation

Condition	Reference	Application
(a) Land disturbed must be rehabilitated to a stable and permanent form suitable for a subsequent land use acceptable to the Director-General and in accordance with Mining Operations Plan so that: - • There is no adverse environmental effect outside the disturbed area and that the land is properly drained and protected from soil erosion. • The state of the land is compatible with the surrounding land and land use requirements. • The landforms, soils, hydrology, and flora require no greater maintenance than that in the surrounding land. • In cases where revegetation is required and native vegetation has been removed or damaged, the original species must be re-established with close reference to the flora survey included in the Mining Operations Plan. If the original vegetation was not native, any re-established must be appropriate to the area and at an acceptable density.	Lease Conditions - Section 12	ML1507
The lease holder must comply with any direction given by the Director-General regarding the stabilisation and revegetation of any mine residues, tailings or overburden dumps situated on the lease area.	Lease Conditions - Section 13	ML1507
Any disturbance resulting from the activities carried out under this mining lease must be rehabilitated to the satisfaction of the Minister.	Lease Conditions - Section 2	ML1766
If the operation ceases, or the applicant determines that he/she will not continue to proceed with the development of the site, applicant is to restore the site to a condition similar to the topography that existed before the applicant had possession of the site. All earthworks such as banks, processing areas, etc. are to be levelled and ripped as required.	Development Consent S96/2017/004 - Section 41	ML1507 ML1766
Any disturbance resulting from the activities carried out under this mining lease must be rehabilitated to the satisfaction of the Minister.	Development Consent S96/2017/004 - Section 45	ML1507 ML1766

2.2 Final land use options assessment

Defined in the Development Consent.

2.3 Final land statement

The final landform would emulate the pre-mining landform and incorporate dunes, swales, and flats. The created dunes, though lower than those currently located within the Mine, would be consistent with the overall mix of high and low dunes which occur throughout the local area.
Notwithstanding bulking effects which would occur in association with the excavation and subsequent replacement of the overburden, and the creation of dunes and rises of a lower elevation than occurring prior to mining, it is projected that the final landform will incorporate a shallow depression or void within the area of the final extraction area.
Other project-related features which would form part of the final landform would include the sediment basins which would be retained as future stock and native fauna watering sources and, subject to the requirements of the leaseholders, sections of the final internal access road system.

2.4 Final land use and mining domains

2.4.1 Final land use and mining domains

Domain Code	Primary Domain / Description	Secondary Doman (Post Mine Use)	Domain Code
1	Infrastructure area – Access roads, drying beds, and plant laydown area.	Rehabilitation area - Grazing	D
3	Water Management Area – Water Sumps (evaporation ponds), stormwater banks	Rehabilitation area - Grazing	D
6	Active Mining area	Rehabilitation area - Grazing	D
	Overburden placement area	Rehabilitation area - Grazing	D
	Topsoil Stockpile areas	Rehabilitation area - Grazing	D
7	Rehabilitation area - Pastoral	Rehabilitation area - Grazing	D

2.4.2 Final land use and mining domains

The following mining domains exist within the operational/disturbance areas within the mining leases and are illustrated in the final landform and rehabilitation plan in Section 5.

- Infrastructure Area- Access Roads, drying beds, camp, and laydown area
- Water management area- water sumps, drains and storm water bank
- Active mining area- current mining pit
- Overburden placement area- previous years mining pits
- Topsoil stockpile areas- current topsoil stockpile locations
- Rehabilitation area- areas previously mined and rehabilitated.

3.Part 3 – Rehabilitation Risk Assessment

See Appendix A.

A thorough update took place in 2025, it included the risks to seeding, further controls on feral animals and included Martin James, SIA Environmental input as well as Garraway Earthmovings thoughts. All changes are marked in red.
Major changes include stock control destroying growth, risks related to seed spreading, weed control and drought management.

4.Part 4 – Rehabilitation objectives and rehabilitation completion criteria

The long-term rehabilitation objectives of mining disturbed areas at Arumpo Bentonite are generally consistent with the establishment and/or maintenance of sustainable grazing land for livestock.
The two main post mining objectives are for the rehabilitated areas to be stable and self-sustaining.

Final land use domain	Mining Domain	Rehabilitation Objective Category	Rehabilitation Objectives	Indicator	Rehabilitation completion criteria	Justification / validation methods
Agriculture - Grazing	**All mining domains**	Removal of Infrastructure	All infrastructure that is not to be used as part of the final land use is removed to ensure the site is safe and free of hazardous materials.	Removal of all services (power, water, communications) that have been connected on the site as part of the operation.	All utility infrastructure removed.	Utility service disconnection record / notification Before and after site photographs.
				Removal of all water management infrastructure (including pumps, pipes and power)	Infrastructure removed	Statement provided Before/after site photographs.
		Retention of Infrastructure	All infrastructure that is to remain as part of the final land use is safe and does not pose any hazard to the community.	Damage to access tracks has been repaired and stabilised.	Repairs complete.	As-constructed final landform plan Before/after site photographs.
				Ownership and responsibility for retained access tracks is identified.	All retained infrastructure under clear ownership for appropriate post mining land use.	Correspondence from landowner regarding agreement of final land use.
		Land Contamination	There is no residual soil contamination on site that is incompatible with the final land use or that poses a threat of environmental harm.	Waste material and/or visible contamination areas on site surface.	There are no visible signs of contamination following the removal of plant, equipment and materials. All rubbish/ waste materials	Statement provided Before/after site photographs.

Final land use domain	Mining Domain	Rehabilitation Objective Category	Rehabilitation Objectives	Indicator	Rehabilitation completion criteria	Justification / validation methods
					removed from site.	
		Management Of Wastes and Process Materials	Residual waste materials stored on site (e.g. tailings, coarse rejects and other wastes) will be appropriately contained / encapsulated so it does not pose any hazards or constraints for intended land use.	Measured - survey of emplacement of fines to verify removal.	Visual – verification that all above ground bentonite has been removed.	Before/after site photographs Rehabilitation monitoring reports Surveys
		Landform Stability	The final landform is stable for the long-term and does not present a risk of environmental harm downstream/downslope of the site or a safety risk to the public/stock/native fauna. As far as practicable, to blend the created landforms with the surrounding land fabric.	Visual - indicators of erosion and land instability. Visual - indicators that surface water management structure are functioning as designed. Measured - Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Plan. Measured - survey of rehabilitated landform to specifically monitor settlement and/or material loss via erosion.	Visual- minimal erosion that would not require moderate to significant ongoing management and maintenance works. Visual – no signs of land instability such as mass movement. Visual - no areas of active gully erosion. Survey verifies final landform complies with final landform construction in accordance with Final Landform	Before and after photos Rehabilitation monitoring reports As constructed surveys

Final land use domain	Mining Domain	Rehabilitation Objective Category	Rehabilitation Objectives	Indicator	Rehabilitation completion criteria	Justification / validation methods
					and Rehabilitation Plan.	
		Surface Water	Runoff water quality from mine site is similar to, or better than the pre-disturbance runoff water quality.	Water quality parameters selected from Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 and or Environment Protection Licence (further guidance available on NSW Environment Protection Authority website).	Water quality discharged from rehabilitated mining operation meet specifications in Environment Protection Licence and or ANZECC guidelines for specific environment.	Independent hydrological assessment report Environment Protection Licence relinquished by Environment Protection Authority
		Agricultural Revegetation	Revegetation is sustainable for the long-term and only requires maintenance that is consistent with the intended final land use.	Indicators of nutrient cycling are suitable for sustaining the target vegetation community.	Litter cover is within 10th-90th percentile variation range of reference sites/data.	Rehabilitation monitoring reports Independent soil reports (where required) that demonstrate longterm function of rehabilitated landform Before/after site photographs Rehabilitation monitoring reports Independent ecological reports (where required) that

Final land use domain	Mining Domain	Rehabilitation Objective Category	Rehabilitation Objectives	Indicator	Rehabilitation completion criteria	Justification / validation methods
						validate rehabilitation completion criteria have been met.
		Agricultural Revegetation	Land use capability is capable of supporting the target agricultural land use.	Resilience demonstrated by the effects of drought and fire on composition, structure and other function attributes.	Resilience to drought and fire.	Rehabilitation monitoring reports Environmental monitoring records.
				Threats to rehabilitation.	Vertebrate pest species – presence and damage is recorded at a level that does not cause significant risk to rehabilitation. Domesticated stock - presence and damage is recorded at a level that does not cause significant risk to rehabilitation.	Rehabilitation monitoring reports.
		Bushfire	The risk of bushfire and impacts to the community, environment and infrastructure has been addressed as part of rehabilitation.	Appropriate bushfire hazard controls (where required) have been implemented on the advice from the landholder	Bushfire controls implemented.	Statement provided Before/after site photographs.

4.2 Rehabilitation objectives and rehabilitation completion criteria – stakeholder consultation

Consultation has also occurred through the Annual Environmental Management Report and review process and as well as formal and informal consultation with local landholders and the community on an ongoing basis.
The expectations from the landholders are that the area be left in a state that is amenable to grazing sheep and goats at a low intensity scale.
The expectations from the regulators, including the NSW Resources Regulator and the EPA are that the area is to be non-polluting, stable, and self-regenerating.

Stakeholder	**Form of Consultation**
NSW Resource regulator	Emails, site visits, annual report
EPA	Site visits and annual report
Landowner	Back of the ute conversations

5.Part 5 – Final landform and rehabilitation plan

A FLRP was prepared in 2023 and uploaded to the regulator portal for approval. In 2025, after extensive correlation of drill data, a profile is being build of the size, shape and depth of the resource we are working into until end of life at mine. A new geologist, Nycole Riordan, has been contracted to develop this resource outline in order to better gauge the amount of material AB will mine from the area.
With the overburden ratio now well know, a much better final landform should be developed. This has the added benefit of getting all RLs designed well ahead of time so that no pit is over filled with overburden to be moved later (double handled). We can also give the tractors the RL levels to work to for easier management.
The landowner has now shown a strong willingness to develop a stock dam, if developed properly to prevent stock getting stuck. With this in mind, we are planning on having a central depression that is fed on all sides. This work is expected to be completed in time for the annual rehabilitation report, depending on contractors and consultants.

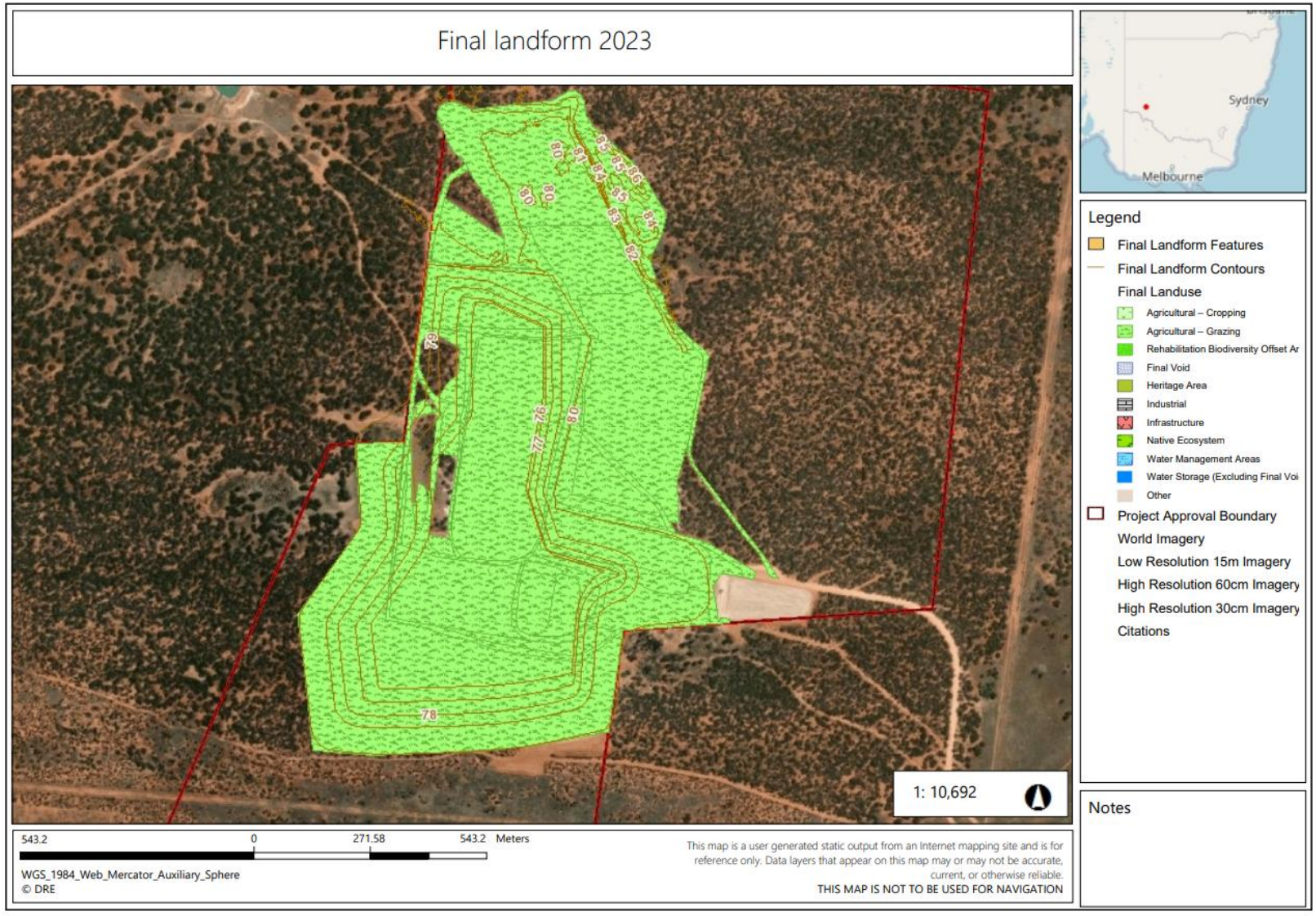


Figure 1 - Final Landform 2023

Part 6 – Rehabilitation implementation

Areas disturbed at Arumpo Bentonite will be progressively rehabilitated following mining activities.

The rehabilitation schedule over the Life of Mine (LOM), from the commencement of the RMP until expected lease relinquishment is described in the following sections.

A recent snapshot of disturbance and rehabilitation from October 2024 has been included as Figure XX.

The Forward Program prepared for the mine provides further details of activities in the short-term (i.e. next three years).
These are due to be updated at end of November 2025.

Arumpo Bentonite has assumed that there would be ample seeds and minimal extreme weather events.

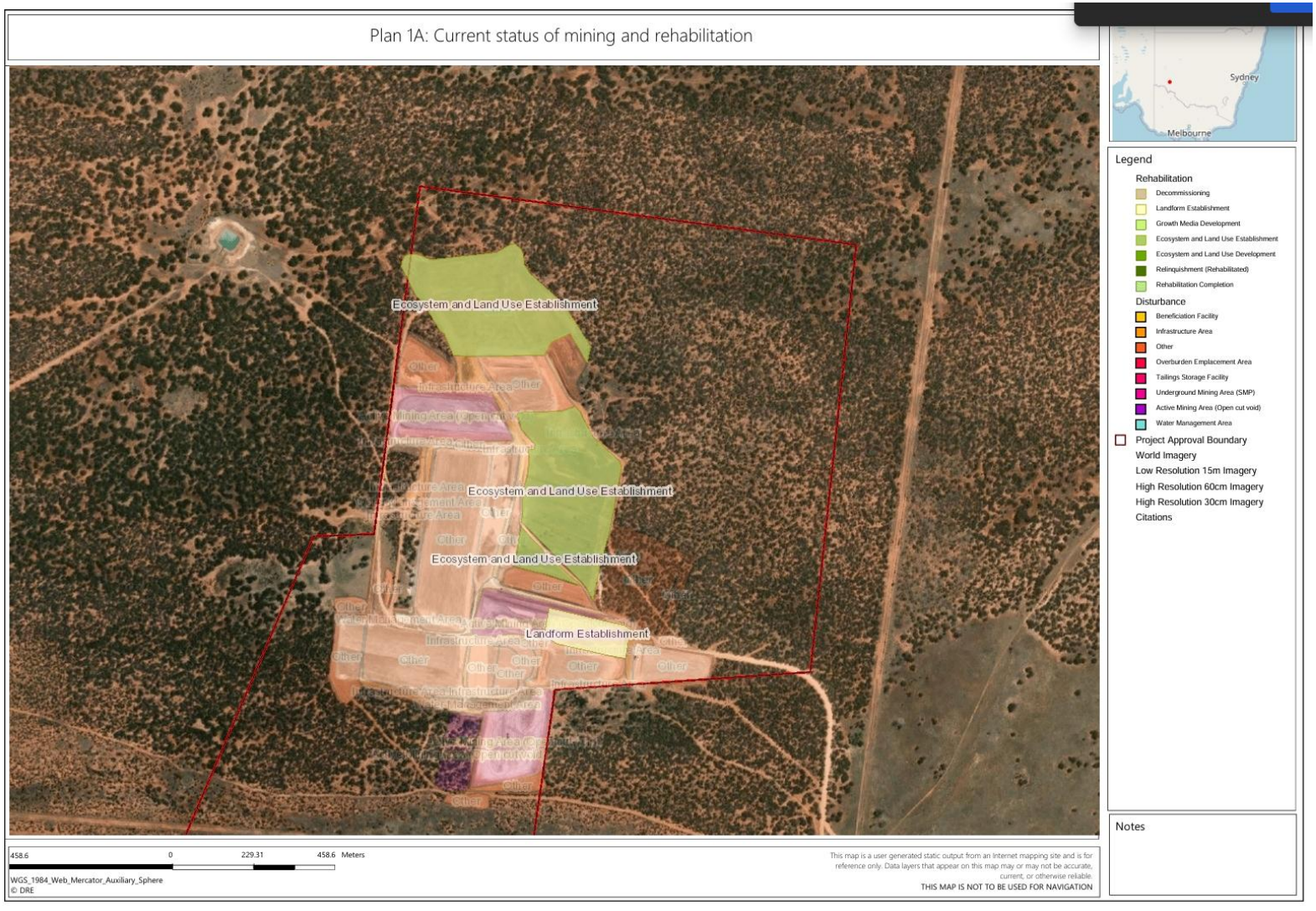
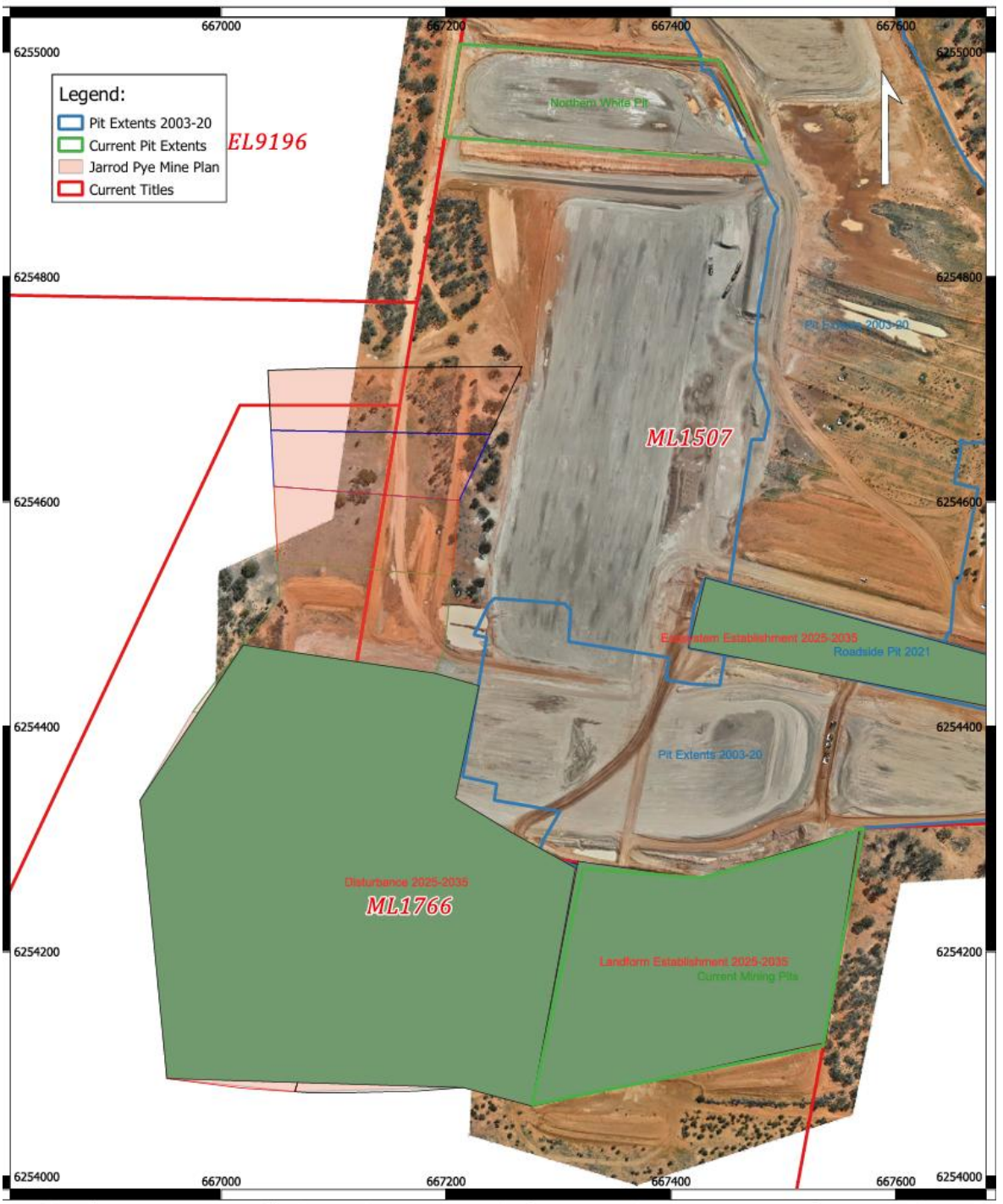


Figure 2 - Current areas under rehabilitation and disturbance

LOM 2025-2035



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291 Arumpo Rd, Buronga NSW					Horizontal Datum:	GDA94 / MGA zone 54	Date of Creation:	Oct 2025
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www.arumpo.com.au	NO	DATE	REVISION	CHK	Sheet Size:	A3	Data complied by:	J. McBrien

Figure 3 - LOM 2025-2035

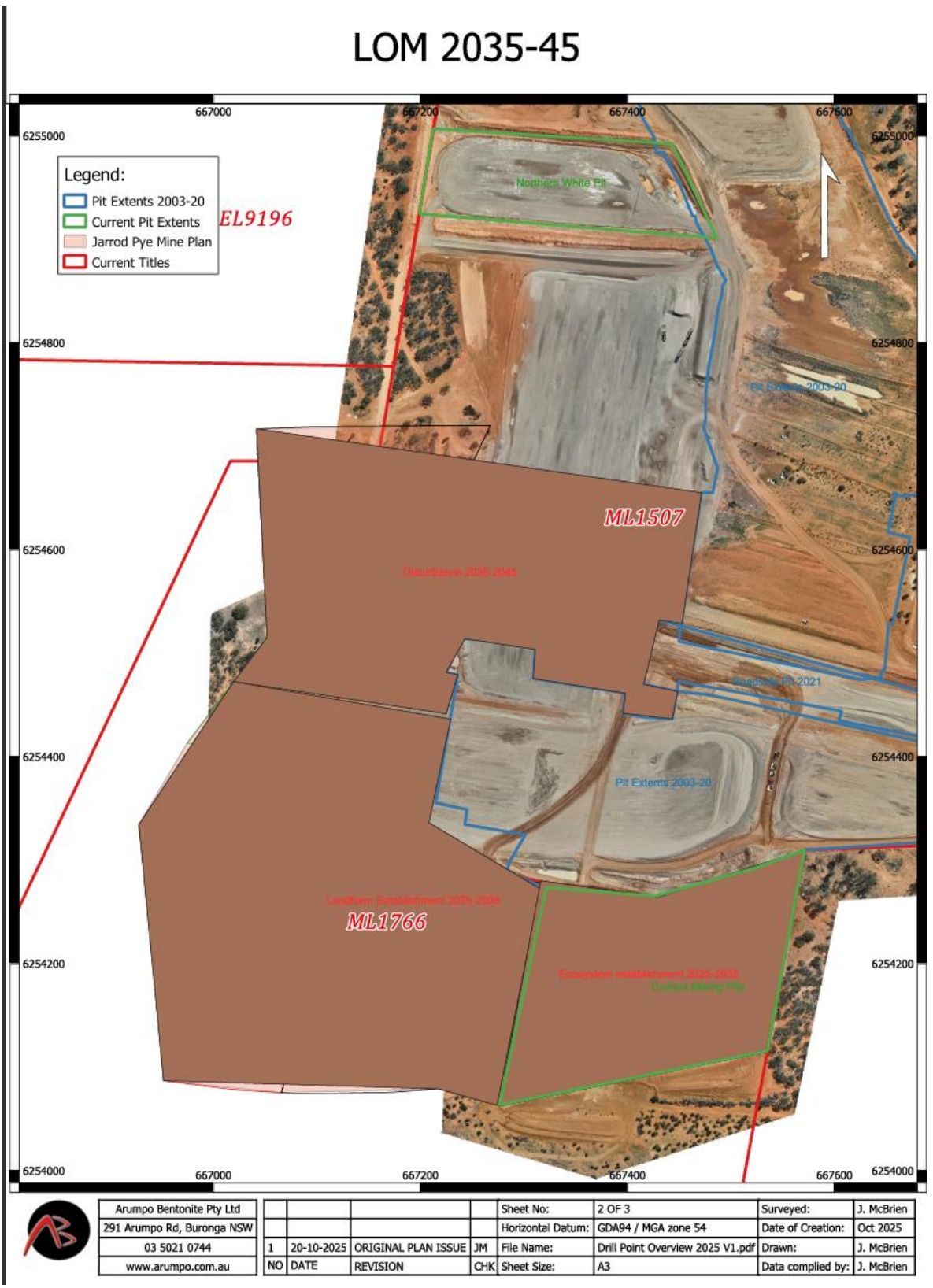

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Figure 4 - LOM 2035-2045

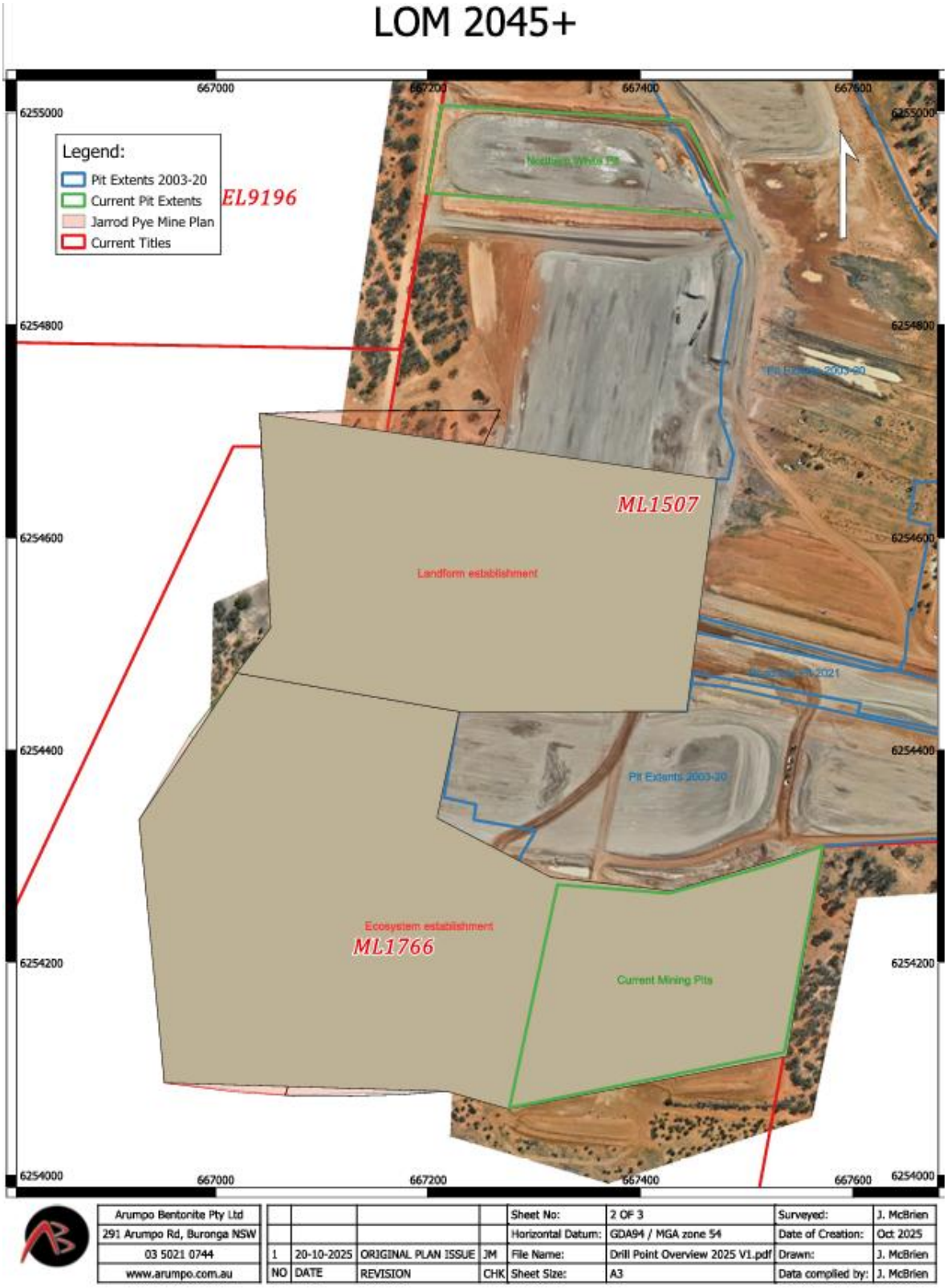

Figure 5 - LOM 2045+

6.1 Life of Mine rehabilitation schedule

Given the nature and development of the bentonite market, volumes and depths of mining vary dramatically depending on which market needs are active during the mining year. We may remove all chocolate if there is a specific need, otherwise it will be left in the ground.

With this in mind, it is difficult to plan 3 years ahead for pit design and shape. The basic tenant of Arumpo Bentonite mine scheduling is the haul back methodology – when one pit is finished, another one is opened up close by and the old pit is filled with overburden/waste from the new pit. Any walls are removed and graded to a shallow gradient to allow minimal erosion, and the ground is prepared for topsoil placement with the methodologies mentioned later.

At current usage rates, there is a general estimate of 10 years in the current strip we are mining before moving east.

6.2 Phases of rehabilitation and general methodologies

6.2.1 Active mining phase

a. Soils and materials

Vegetation clearing will be conducted in late Summer or Autumn where practical. A pre-clearing inspection will be conducted prior to commencing on any hollow bearing trees. Clearing will be undertaken using a Front-end loader or tracked dozer with the bucket/blade positioned just above surface level. Shrubs and grasses would be left in-situ and be collected with topsoil stripping operations.

All logs/branches will be stockpiled for future use in the rehabilitation process. Once topsoil has been replaced in rehabilitated areas these will then be placed on top of the areas thus reducing potential wind erosion, to assist in the establishment of vegetation and to provide a habitat for fauna.

Topsoil will be removed to a nominal depth of 300mm and stockpiled in designated locations. Where possible topsoil may be directly placed on previously mined and rehabilitated areas.

Topsoil stockpiles will be left with a rough surface to prevent erosion. Topsoil is a precious resource and will be actively managed to ensure the resource is sufficient to meet final land use requirements.

An up-to-date surveyed account of topsoil resources will be maintained to ensure there is no resource deficit for rehabilitation activities.

It is not anticipated that there will be a topsoil deficit for life of mine rehabilitation.

b. Flora

Revegetation of mined out areas is reliant on natural regeneration of seed contained within the topsoil. To date there has been no requirement to complement with locally sourced seed, seed collection, nursery propagation or other revegetation techniques.

The revegetation/regeneration of ground cover species has been successful over the life of mine and consistent with the landowner's intent to return the land to grazing at the completion of mining.

Minor weed management controls are conducted by the landowner, no weed infestation has occurred because of mining activities to date.

All the vegetation within the Mining Lease is regrowth following clearing in the 1980's and in 2015.

No threatened species were identified during ecological field surveys conducted in 2017.

Supplimentary seeding can be carried out under these optimal seasonal conditions:

Scientific Name	Common Name	Best Time to Germinate	Germination conditions
Anagallis arvensis	Scarlet Pimpernel	Autumn to spring	Seeds can be sown in spring or early autumn. They prefer moist, well-drained soil and a sunny or partially shaded location.
Austrostipa nitida	Speargrass	Autumn to early winter	Sow seeds in autumn. This plant is a native grass that can be grown in a variety of soil types.
Onopordum acanthium	Scotch Thistle	Autumn or spring	Sow seeds in autumn or spring. The seeds can be sown directly into the ground where they are to grow.
Wahlenbergia communis	Tufted Bluebell	Autumn to winter	Sow seeds in autumn.

Figure 6 - Seed germination timetable

Weed control

Wild sage has been found to be grow well in rehabilitation areas but can be sprayed with 2,4-D during spring and wet periods. 2,4-D does not affect native plants, only broadleaf weeds. The landowner/farmer sprays as part of his farm schedule.

c. Fauna

Vegetation clearing will be conducted in late Summer or Autumn to minimise potential impact on fauna. To identify any A pre-clearing inspection will be

conducted to identify any occupied hollow branches or fauna habitats. If any are identified, they will be moved away from mining activities.

Clearing will be undertaken using a bucket/blade positioned just above ground level to minimise surface disturbance.

Cleared vegetation will either be mulched or stored in designated stockpiles for redistribution over rehabilitated areas.

No threatened species were identified during field surveys conducted on the mining lease. However, it was noted that two species (Mallee Worm-Lizard and Marble Faced Delma) even though were not identified, it was recommended that all mine personnel receive advice on the identification and mechanisms for their management if they were encountered. To date neither species has bee observed at the mine site.

The mine lease is fenced to prevent access from grazing animals.

d. Rock Overburden emplacement

Overburden is removed by scrapers/ laser buckets and is placed in the previously mined out areas to develop the final landform. The landform is profiled to replicate the surrounding farmland comprising dunes, swales, and flat areas. It is projected that the final landform will have a shallow depression or void in the final extraction area.

Should there be an overburden deficit once mining has been completed the remaining batters will be profiled to a 1:3 (V:H) using the available overburden or low-grade bentonite salvaged from stockpiles or the drying beds.

Any additional material required will be pushed/obtained from previously backfilled areas.

e. Waste Management

All paper, general waste, domestic waste, recycling, and maintenance consumables are placed in segregated bins. These bins are regularly emptied, and the contents are disposed of at the Buronga Landfill Facility.

Oils and greases are stored in a self-bunded Hydrocarbon container. Any soil contaminated with hydrocarbons is placed in a drum for disposal at the Buronga Landfill Facility.

Portable ablutions are provided onsite and are cleaned/emptied on an as needs basis.

f. Geology and geochemistry

The bentonites lie in an area ca. 10 km long by 5 km wide and consist of several large flat-lying seams some kilometers in extent and typically 5 –8 meters thick covered by 5–20 meters of a soft clay and sand overburden. The central section of the generally six-meter-thick seams consistently contain very high purity smectite

(montmorillonite with interstratified illite) often with lower than 1% of accessory minerals. The bentonite is associated with the eruption of volcanic ash of Trachy-andesite composition during the Pliocene from a series of vents located along the central axis of the Murray Basin.
The major deposit currently being mined was postulated to have been deposited in lagoonal systems behind the then coastal dunes perched on and presumably formed by wind action from the coastal Loxton-Parilla strata.

The bentonite deposits in the vicinity of the Mine occur as two main depositional events:

- The upper bentonite (younger) tends to be thinner, sandier, and more weathered resulting in a high proportion of it being classified as “Weathered” (unusable), “Red Bentonite” (limited use) or Intermediate (second grade).
- The lower bentonite tends to be thicker, with a higher purity and generally provide the bulk of the premium product but has a thin coloured (Chocolate brown) layer at the base.

g. Material prone to spontaneous combustion

No spontaneous combustion has occurred onsite and the risk of spontaneous combustion in bentonite is negligible.

h. Material prone to generating mine acid drainage

No PAF materials or any other geochemical issues of concern have been identified.

i. Ore beneficiation waste management (reject and tailings disposal)

No on-site processing of bentonite occurs, and no tailings dams are present.

j. Erosion and sediment control

The site has a system of diversion banks which isolate the mining area from inflowing storm water. The bank design ensures flow rates are low and cause little or no erosion. Internal drains collect potentially sediment laden storm water and direct runoff to containment areas (evaporation sumps). These sumps are regularly cleaned using a Front-End Loader or Excavator.

Once topsoil has been replaced logs and branches previously stockpiled are used to prevent wind erosion and to provide a suitable fauna habitat.

Any weed incursions will be controlled by the Landowner as part of their routine weed control program.

k. Ongoing management of biological resources for use in rehabilitation

Topsoil (including grasses and other vegetation) will be removed to a nominal depth of 300mm and either placed directly onto rehabilitated areas or stored in designated stockpiles. Stockpiles are left with a rough surface to avoid any unnecessary mechanical working of the soil and a stored to a maximum height of 2

metres to ensure the material retains its natural microbial and structural benefits.

Topsoil stripping and replacement will usually take place in late summer/autumn to coincide with the autumn/winter growth cycle.

Logs/branches that had previously been stockpiled will be redistributed to prevent wind erosion and to assist in revegetation development.

To date propagation of native seeds and/or translocation of other species has not been required.

l. Mine subsidence

Not applicable

m. Management of potential cultural and heritage issues

No places or objects of Aboriginal cultural heritage were identified during field surveys conducted in 2017 (Landskape).

The ongoing management of Aboriginal heritage within the Mine relates to staff awareness and contingency measures to be implemented should any unexpected places or objects of Aboriginal cultural heritage significance be identified.

In the unlikely event that previously unidentified Aboriginal cultural heritage places or objects are encountered during ongoing operations, all activities likely to affect the material would cease immediately and the OEH's Environmental Line (Ph: 131 555) contacted to establish an appropriate course of action prior to recommencing the work.

In the unlikely event that human skeletal remains are encountered during ongoing operations, all work with the potential to impact the remains would cease in the proximity of the remains. The remains would not be handled or otherwise disturbed except to prevent further disturbance. If the remains are thought to be less than 100 years old, the Police or the State Coroner's Office (Ph: 02 9552 4066) would be notified. If there is reason to suspect that the skeletal remains are more than 100 years old and Aboriginal, the Applicant would also contact the OEH's Environmental Line (Ph: 131 555) for advice.

In the unlikely event that an Aboriginal burial is encountered, strategies for its management would need to be developed with the involvement of the Barkandji Native Title Working Group Aboriginal Corporation.

Arumpo Bentonite would provide training to all on-site personnel regarding the potential for places or objects of Aboriginal cultural heritage to occur and contingency actions to be taken relevant to their employment tasks.

Arumpo Bentonite would continue to involve the Barkandji Native Title Working Group Aboriginal Corporation in the operation of the Mine, where it is appropriate to do so.

Landskape (2017) concluded that the potential for disturbing unexpected places or objects of Aboriginal cultural heritage significance within the MLA Area is very low to negligible.
Assuming the implementation of the management and contingency measures described above, the risk of impacting places or objects of Aboriginal cultural heritage significance within the MLA Area is also low.

6.2.2 Decommissioning

a. Site security

The Arumpo mine site is in a remote location on a property managed by western land Lease. There are signs and several gates to get through over several kilometres off Arumpo Road before entering the mining lease area. Public access or someone accidently entering the mining lease area is very remote.

b. Infrastructure to be removed or demolished

There are no fixed assets on the mining lease, except for the phone tower. The tower will be decommissioned, and the concrete pad removed and disposed of.

All demountable buildings and portable assets will be removed by the mining contractor at the completion of mining activities.

The mine access road will be retained as it forms part of the station track system. Some internal mine roads may also be retained for use and with the permission of the landowner.

Any rock will be removed from hardstand areas prior to ripping. All laydown areas will also be ripped prior to topsoil application.

c. Buildings, structures, and fixed plant to be retained

The mine access road and grids connecting the mine site to Arumpo Road will be retained as they form part of the internal track system. Any onsite road required by the landowner will also be retained.

The diversion bank, internal drainage controls and evaporation sumps will also be retained to minimise the potential for erosion and for use as water storage for domestic stock.

d. Management of carbonaceous/contaminated material

Limited quantities of hydrocarbons are used onsite. Materials are stored in a self-bunded container when not in use. The potential for any spillage and the associated risk is low.

Any contaminated material will be placed into drums and disposed of at the Buronga Landfill Facility.

e. Hazardous materials management

A SDS Register contains a list of all hazardous materials used onsite. Any remediation or removal of hazardous materials that exist following the completion of mining will be as per the guidelines outlined in the relevant SDS.

Any contaminated material will be placed in drums and disposed of at the Buronga Landfill Facility.

f. Underground infrastructure

Not applicable.

6.2.3 landform establishment

a. Water management infrastructure

There are no major drainage lines or natural surface water bodies within or adjacent to the mine site. Two surface water tanks (Normansland and Emu Tanks) are located to the north and west of the mine lease. The current catch bank directs water to the north and west towards Emu tank and will be retained at the completion of mining.

Bund walls have been constructed around the active mining pits principally for safety but also to prevent overland flows of water into the active mining area. These are continually moved as mining progresses and will be removed at the completion of mining.

The diversion bank, internal drainage controls and evaporation sumps will also be retained to minimise the potential for erosion and for use as water storage for domestic stock. They will be topsoiled to prevent potential erosion.

b. Final landform construction- general requirements

The final landform would emulate the pre-mining landform and incorporate dunes, swales, and flats. The created dunes, though lower than those currently located within the Mine, would be consistent with the overall mix of high and low dunes which occur throughout the local area.
Notwithstanding bulking effects which would occur in association with the excavation and subsequent replacement of the overburden, and the creation of dunes and rises of a lower elevation than occurring prior to mining, it is projected that the final landform will incorporate a shallow depression or void within the area of the final extraction area.
Other project-related features which would form part of the final landform would include the sediment basins which would be retained as future stock and native fauna watering sources and, subject to the requirements of the leaseholders, sections of the final internal access road system.

It is anticipated that the land would be predominantly returned to grazing following closure of the Mine. Land to the south of the Mine has been previously cleared by the leaseholders with the intention of sowing crops in this location. As a result, the land within the Mine may eventually be used for cropping. It has therefore been determined, in consultation with the leaseholders, that the final landform would have a ground cover suitable for grazing and not be revegetated with a shrub layer

or trees.

c. Final landform construction- reject emplacement areas and tailings dams

No processing of bentonite takes place onsite, and no tailings are dams have been constructed.

d. Final landform construction- final voids, highwalls and low wall

At this stage further drilling is required to complete the exploration of ML1507. It is anticipated that this will occur in the next 3-5 years. The current mine path has approximately 12 years of mine life and it is expected an additional 2-3 years of mining will be added at the completion of drilling.

Once the final mine path design has been established a backfill contouring plan will be developed to ensure the final void meets the final landform design.

The groundwater level sits approximately 18 metres below the base of the mining pit so is not considered

The final landform will

e. Construction of creek/river diversion works

Not applicable.

6.2.4 Growth, medium development

The growth, medium development phase involves the placement of overburden and topsoil on the final landform and the preparation of the surface for revegetation. Topsoil and overburden can be identified by shading and the amount of organic matter in each. Topsoil is significantly darker and is stockpiled as soon as stripped or reapplied to existing disturbances.

Soil preparation will include the harrowing of the applied topsoil to maximise water infiltration and retention into the substrate and to provide for an adequate seed bed. This will go along contour lines to reduce erosion and retain moisture.

Soil testing

The addition of fertiliser and seed application would also be considered, but to date has not been required. Soil testing will take place prior to rehabilitation to check against undisturbed soil, or with a soil scientist recommendation to improve the media for growth. A cost benefit analysis will be undertaken each time to way up if it is reasonable practicable.

Soil will also be checked for salinity and pH in the field. All results will be recorded and logged into the RMP. If the pH or salinity is found to be outside the range of undisturbed soil, a soil scientist will be consulted to determine the best course of action to rectify the situation.

Topsoil will be applied directly from the designated topsoil stockpiles using a tractor and carry scoop. It will be applied to an approximate depth of 100-300mm. A smudge board will then be used to evenly distribute the soil over the rehabilitated area. Where practical topsoil will be replaced in the late summer/autumn in anticipation of the winter rains.

Once the topsoil has been replaced logs and branches, previously stockpiled, will be distributed over the rehabilitated surface to prevent wind erosion and to provide a suitable fauna habitat.

A diversion bank will prevent the inflow of surface runoff into the rehabilitated area.

Any weed incursions will be controlled by the landowner as part of their routine weed control program.

Any seeds will be spread just before several rain events, which can be forecast on the BOM website.

6.2.5 Ecosystem and land use establishment

This phase involves the activities that are required to develop the ecosystems that are self-sustaining and assist to meet the final completion criteria.

Feral animal control:

Pest animals have been highlighted as a key hazard to rehabilitation if uncontrolled.

Controls to prevent grazing pressures:

- The rehabilitation areas are not fenced from feral and domestic stock within the mining lease area. The farm does not want to stop these animals. Initial surveys by Martin James in 2025 found that there did not seem to be any damage from goats within the rehabilitated area and native fauna was growing. Arumpo Bentonite will fence off part of the rehabilitated area to check if grazing is causing a severe damage to growth before investing in large scale fencing.
- The area will also be monitored by a trail camera that takes photos when movement occurs. This camera will be checked daily by the quarry manager during spring and summer to check if there are any herds disturbing the rehabilitation. If herds are seen to be active, Arumpo will investigate installing a motion detection scare gun.
- The landowner has agreed to muster any goats in the mine block in early spring for market in order to reduce the population for growth in Spring time.

Seeding

Seeding will occur annually to supplement the seedbank found in the topsoil. A section of existing rehabilitation will be fenced and another section left unfenced. Seeds will be spread at the appropriate time of year and monitored to check which are successful with and without grazing pressures. This will inform which is will quickly establish to develop ground cover.

A final trail of a sterile cover crop is currently under discussion with the landowner in order to facilitate quick ground cover on sloped areas to reduce erosion and topsoil blow off.

No tube stock is expected to be used.

Rehabilitation management

Regular inspections (refer to Section 8) will be conducted to monitor the success and progress of rehabilitation.
The following measures will be implemented to facilitate the successful development of rehabilitation:

- Comparing specific ecosystem characteristics such as soil profile development, floristic composition and structure with the characteristics of appropriate analogue sites;
- Undertaking adaptive management and remedial works where characteristics of the rehabilitation are not trending toward desired outcomes;
- Where issues requiring maintenance (e.g. erosion observed in a rehabilitation area following a heavy rainfall event) are observed during a monthly inspection, the Quarry manager will arrange for a contractor to undertake remediation works on an as needs basis;
- Re-seeding and, where necessary, re-topsoiling and/or the application of specialised treatments such as composted mulch or bio-solids to areas with poor vegetation establishment;
- Weed management will be required and implemented where regular inspections indicate that there is a risk of weeds significantly impacting the establishment of target vegetation; and
- Browsing/damage by macropods and feral animals will be monitored. Control programs will be implemented as required.

Weed spraying

Weed infestation is controlled by regular spraying by the landowner as part of the farm lease spraying program. As discussed in section 6.2, spraying with 2,4-D ester will kill any wild sage onsite as it is a broadleaf weedkiller but will not affect any native species.

A training program is proposed to develop the knowledge of the key stakeholders, the quarry manager, mine manager and landowner. The environmental consultant will develop an identification table for each plant that has been found onsite so that monthly inspection can check for weed growth. This will allow for monthly inspections of rehab by the mine management team and landowner.

The water diversion bank and all internal water drains and sumps will be regularly inspected and maintained. Any land forming/ contouring to the final landform will allow water to be internally draining. Monthly field inspections, or after extreme weather events, will be conducted to identify any erosion issues and rectification work will take place when equipment is available at site, preferably in summer to reduce damage during the growing season.

Monitoring of revegetation performance will be undertaken by aerial survey monthly. It will look for any areas of low-density growth in comparison to surround growth. Any areas of concern will be identified, and mitigation works commenced including the application of fertiliser. Although this has not been required to date to achieve the rehabilitation outcomes but would be considered if applicable. Further discussion with our ecologist would be needed to identify a long acting, slow release fertiliser.

As the final land use criteria is for agriculture use/grazing a grazing trial would be considered prior to final land use sign off as week as consultation with the landowner.

Rehab signoff

Rehabilitated areas will be progressively signed-off by the RR as they meet the rehabilitation criteria and objectives outlined in Section 4.2, in accordance with the Guideline: Achieving Rehabilitation Completion (Sign-off).

6.3 Rehabilitation of areas affected by subsidence

Subsidence of previously backfilled and rehabilitated areas has not occurred to date at the Arumpo Mine. In the unlikely event that subsidence does occur then the areas will be recompacted with overburden and the topsoil replaced.

Any remediation will be verified by survey to determine profile stability.

6.Part 7 – Rehabilitation quality assurance process

The following process will be implemented throughout the life of mine to ensure rehabilitation outcomes are met.

Rehabilitation Phase	Asset / Domain	Quality Assurance Actions and Processes	Responsibility
Active Mining	Soil Stripping and replacement	• Instruction to laser scoop operators to extract to depth • Visual inspection • Stockpile measurement • Direct return of topsoil if possible • Stockpiles developed inline with stockpile management plan	Quarry manager Quarry manager Surveyor Mine manager Mine manager, Quarry Manager
	Cleared timber stockpiles	• Instruction to earthmoving contractor as per RMP • Visual inspection • Sign-off • Implement pre-clearing procedures to minimise environmental impacts and maximise biological and habitat resources.	Quarry manager Quarry manager Quarry manager Mine Manager
	Overburden landform development	• Instruction to earthmoving contractor as per RMP • Development of final landform for tractor GPS • Visual inspection • Final landform DEM	Quarry manager Mine manager Quarry manager Surveyor
	Geotechnical stability of landforms under development	• Visual inspection	Quarry manager
Decommissioning	Infrastructure decommissioning works	Visual field inspection	Quarry manager, mine manager
	Infrastructure decommissioning plans	Visual field inspection Develop and complete decommissioning plan	Quarry manager, mine manager, CEO

Rehabilitation Phase	Asset / Domain	Quality Assurance Actions and Processes	Responsibility
Landform establishment	Final landform construction	GNSS survey of batter angles Drone survey of depressions (DEM) Ensure the landform as a minimum meets the requirements of the Development Consent	Surveyor, Mine manager and Quarry manager
		Final void to meet specifications as outlined in the SOEE (re final Batter design) and landowner signoff	Surveyor, Mine manager and Quarry manager
Growth medium development	Soil stockpiles	Drone survey for volume Test soil for deficiencies	Surveyor
	Rehabilitation soil mix	Visual inspection, soil sampling for salinity and pH.	Mine manager, quarry manager
	Erosion and sediment control	Visual inspection	Quarry manager
	Weather forecast (short to long term)	Website	Mine manager, quarry manager
Ecosystem and land use establishment	Growth	Visual inspection, drone fly overs, fixed photo points.	Surveyor, quarry manager.
	Seed germination success	Visual inspection, GNSS walk over of juvenile plants. Testing in lab prior to site germination.	Surveyor
	Weed management	Visual inspection	Quarry manager
	Pest management	Visual inspection, trail cameras monitoring	Quarry manager
	Success species	Repeat and review GNSS data quarterly	Surveyor, Enviro consultant
Ecosystem and land use development	Ecosystem function analysis	Visual	Enviro consultant
	Independent agricultural assessment	Visual	Enviro consultant

Testing:

- pH and salinity of topsoil will be checked onsite with field equipment.
- Seed germination rates will be checked in the lab by germinating 50 random seeds and measuring the % success rate.

- Soil samples will be sent offsite for testing versus other undisturbed soil samples in order to check if any additives area needed.

7.1 Fixed point photo monitoring program

Several photo points have been highlighted in the below plan.

These points have been chosen as they are close to existing tracks and have significant rehabilitation in their view.

Figure 7 - Fixed point photo

GPS locations are:

id	Northing	Easting	Orientation
1	6255195	667301.3	0deg
2	6254818	667519.6	0deg
3	6254612	667678.9	0deg
4	6255102	667569.7	0deg
5	6255103	667415	0deg

A photography program has been implemented in which a photo will be taken at the start of each season to compare changes in landscape. Each season starts in Augest, December, March and June. Each point has a star picket driven into the ground for ease of restablishing viewpoint.

A drone flyover of the entire minesite will be carried out monthly at the end/start of each month and this has been implemented from October 2025. This will give personnel the ability to check for erosion at certain, inaccessible parts of the mine without disturbing any biodiversity by driving on it.

8. Part 8 – Rehabilitation monitoring program

Monitoring of the rehabilitation areas is conducted in accordance with the following sections. Rehabilitation is monitored on a regular basis to ensure vegetation is establishing in the rehabilitation areas and to determine the need for any maintenance and/or contingency measures. The monitoring also aims to demonstrate the effectiveness of the rehabilitation techniques and track the progression towards achieving the Rehabilitation Objectives and Rehabilitation Completion Criteria (Section 4).

8.1 Analogue site baseline monitoring

An analogue site has been selected on the mining lease that has not been disturbed by mining but occurs at a similar position.

8.2 Rehabilitation establishment monitoring

The following inspection regime will be implemented at the commencement of the ecosystem establishment phase. The purpose of which is to enable early identification of issues that have the potential to delay vegetation establishment. To identify if triggers have been met in accordance with the Trigger Action

Response Plan and to provide data for the continuous improvement of rehabilitation methods.

- Photographs of rehabilitated areas from designated photo points
- Aerial monthly survey/photos of rehabilitated areas
- Photo analysis and monthly inspections for landform stability, erosion, and vegetation growth.
- Maintain weed and feral animal control through visual inspections and reporting.

Ground Condition Assessment
Biennial ground condition assessment will occur with an ecologist. The ground condition portion of the field assessment includes:

- % vegetation cover (perennial and annual);
- % bare ground and bare ground/vegetation patch ratio along the 'centre-line' of the quadrat;
- % cryptogam cover; and
- % litter cover and type.

Assessment to determine if light intensity grazing could occur (based on sheep breeds currently used in the NSW Western Division).

Reporting

The results are reported in the Annual Rehabilitation Report.

A checklist has been developed internally for the quarry manager to check the trail camera, any signs of large-scale disturbance, weeds and for erosion.
The surveyor has a checklist to fly the rehabilitation monthly at the end of each month and report back with a high-resolution Ortho mosaic to be stored on the system and checked by the CEO and ecologist regularly.

8.3 Measuring performance against rehabilitation objectives and rehabilitation completion criteria

The results of rehabilitation monitoring will be compared against the proposed Rehabilitation Objectives and Rehabilitation Completion Criteria described in Section 4.1 to track rehabilitation progress.

Outcomes of the rehabilitation monitoring will be provided in subsequent Annual Reviews, and the Annual Rehabilitation Report and Forward Program. Summaries of the monitoring results and performance against rehabilitation objectives and completion criteria will be included in this section when this RMP is updated or revised.

Part 9 – Rehabilitation research, modelling, and trials

9.1 Current rehabilitation research, modelling, and trials

The rehabilitation methods at the Arumpo Mine Site are well established and have proved successful over the last 20 years.
The commencement of drone surveying in 2021 now allows monthly aerial analysis of the mine site.
The use of these photographs will be utilised to monitor rehabilitation progress, vegetation regrowth, erosion and any other issues that may arise.

Discussions with our ecologist are moving us in the direction of starting a trails fencing program.
Three areas will have goat exclusion barriers:
1. No additional work
2. Seeding
3. Watering weekly for one year with seeding
4. Watering weekly for one year with seeding but no fencing

Research into previous drilling programs have revealed immense data that was not available in the current mine path. This will better inform the final landform after we work out the resource area, volume and depth.

Final design on a stock dam for the landowner will allow for this to be built into the design of the final landform.

We have mounted a trail camera pointed at the current rehab area. This will be checked daily by the quarry manager and reported back on to see if extensive grazing is already happening.

9.2 Future rehabilitation research, modelling, and trials

Seed trailing as discussed above, but in a large scale. Hopefully this will uncover highly successful species that can thrive in this environment.

Seeding with sterile seeds on newly established landforms to provide ground cover.

Drone software upgrades that allow for ground cover calculations to be worked out automatically.

10.Part 10 – Intervention and adaptive management

TRIGGER	ACTION	RESPONSE
Insufficient materials and resources to achieve satisfactory final landform.	• Review the final landform requirements / associated material requirements • Assess these requirements against available resources.	• Design final landforms in accordance with available resources. • Assess availability of alternative sources of materials and their costs (if required) • Source additional material where required.
Insufficient topsoil and growth medium material available to achieve satisfactory revegetation	• Assess topsoil resources and requirements.	• Assess availability of alternative sources of topsoil/growth medium material, and their costs. • Source additional material where required.
Landform unstable and unable to achieve revegetation.	• Undertake investigations to identify the extent, source, and cause of the trigger.	Based on the investigation, implement management measures such as: • Use of available materials such as rock or stockpiled topsoil to stabilise areas identified • Revegetate bare ground • Assess water management and drainage structures • Where required a specialist engineer may be required to assess the structural integrity and design appropriate remedial measures.
Excessive erosion and / or sedimentation resulting in land instability and /or vegetation growth issues.	• Undertake investigations to identify the extent, source, and cause of the trigger.	Erosion and sediment control measures may be implemented including: • Erosion channels or bare areas will be managed and eliminated where possible • Riparian areas will be managed to prevent instability and erosion where possible and provide similar pre mining flows • Re-designing and construction of appropriate drainage lines • Installation of sediment traps and fences downslope of erosion areas • Use of available materials such as rock or stockpiled topsoil to stabilise areas identified • Supplementary revegetation of any bare areas.
Poor vegetation establishment and growth.	• Review rehabilitation records including methods, weather records, species used and photographs to determine the cause of poor rehabilitation establishment. • Identify appropriate remediation measures.	The appropriate supplementary response will reflect the cause of limited vegetation response or growth. This may include: • Testing of soil for contaminants, pH, or deficiencies • Supplementary seeding of vegetated areas or topsoil

	• Ongoing monitoring to confirm supplementary measures have been successful.	• Investigation into the possibility of utilising irrigation as part of the water management system to promote germination and establishment of vegetation, and • Supplementary vegetation will be designed based on analogue sites and overall ecosystem structure to include the desired vegetation structure and species.
Weed and / or feral animal infestation	• Rehabilitated areas will be assessed for key weed and feral animal species. • Where a weed or feral animal species is observed an investigation will be undertaken to determine the extent of the invasion, possible sources, and the appropriate response	Appropriate management techniques specific to each species will be implemented to limit the invasion and colonisation of foreign weed and feral animal species such as: • Significant weed infestations or noxious weeds will be removed in accordance with relevant guidelines • Implementation of wash down and inspection procedures if required • Vertebrate pests will be managed to be absent or kept under control and monitored on an annual basis.
Drought	• Replace topsoil at end of summer. • Replace stumps to reduce wind erosion	• Water rehabilitation areas to facilitate vegetation
Bush fire	• Fire break in place • Fire extinguishers and water truck onsite	• Control fire if possible • Contact Emergency Services.

11.Part 11 – Review, revision, and implementation

The table below outlines the statutory triggers for the review of the Rehabilitation Management Plan in accordance with the Development Consent, mining lease conditions and other regulatory requirements and statutory approvals. This is to ensure that the Rehabilitation Management plan remains current and relevant, the rehabilitation outcomes are achievable, and the strategy is in place to meet these Outcomes.

TRIGGER	ACTION
Amendment to rehabilitation objectives, rehabilitation completion criteria or final landform development	Review and update Rehabilitation Management Plan
Changes to Risk Control measures in the Rehabilitation Management Plan	Update Risk Matrix and Rehabilitation Management plan
Whenever directed in writing to do so by the Secretary	Update Rehabilitation Management Plan as directed
Changes to mine design or closure plan	Update Rehabilitation Management Plan and associated documents
TARP is activated (threat to rehabilitation)	Update Rehabilitation Management Plan and TARP/Risk Assessment
Annual Review	Update Rehabilitation Management Plan

The responsibility of Arumpo personnel with regard to the monitoring, review and implementation of this RMP is provided in Table 9 below. Job descriptions have been update or will be updated at the next position review.

Management Team Member(s)	Role and Responsibility
CEO	Provide adequate resources to support environmental management activities, including rehabilitation.
Mine Manager	Provide adequate resources to support environmental management activities, including rehabilitation. Site management. Management of staff and contractors. Ensure site closure strategy is consistent with the Rehabilitation Management Plan. Detailed understanding of the requirements in the Rehabilitation Management Plan. Develop mine plans consistent with the Rehabilitation Management Plan and provide spatial data for forward programs. Develop mine closure plans consistent with the Rehabilitation Management Plan and provide spatial data for forward programs. Ensure final landform plans are consistent with rehabilitation objectives. Oversee the monitoring, review and implementation of this RMP. Annual reporting and auditing, including the Annual Review and Annual Rehabilitation Report. Environmental approvals and planning. Consultation with government and stakeholders. Undertake rehabilitation compliance reviews.
Quarry Manager	Coordinating the monitoring, review and implementation of this RMP. Coordinating the management and implementation of Environmental Management Plans. Assist with Annual Reporting. Undertake rehabilitation compliance reviews.
All staff and contractors	Trained in environmental procedures and protocols. Immediate reporting of incidents. Undertake works in accordance with this RMP.

Table 1 - Site environmental and mining management relevant to implementation of this RMP