Prodigy Gold

ARCHAEOLOGY AND HERITAGE MANAGEMENT PLAN

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1. Introduction

Prodigy Gold NL (Prodigy Gold) is an exploration company located in Darwin, Northern Territory with an extensive portfolio of tenements in the Greater Tanami region of the Northern Territory (Figure 1).

This Archaeology and Heritage Management Plan (AHMP) has been prepared by Prodigy Gold in support of the Company's Authorisations to undertake exploration work on tenements held in the Greater Tanami Region.

This AHMP describes the framework employed by Prodigy Gold for management and protection of sites of significant archaeological or heritage value including safeguards and controls developed to ensure impacts are minimised and outlines monitoring procedures and project management throughout the project areas.

The threat of destroying or harming a sacred site is shown as one of the highest risks to Prodigy Gold, as this could fatally harm the company's ability to perform exploration works in the region. This management plan will be critical to all future works in the Tanami region and wider if the company expands outside this area.

Heritage is also an important consideration, even though the sites are remote. It is important that all relevant sites are noted on company field tablets so they can be recognised by staff while in the field.

The AHMP will be reviewed regularly to maintain relevance to all aspects of the project as part of Prodigy Gold's review of its Mining Management Plans within the Greater Tanami Region.

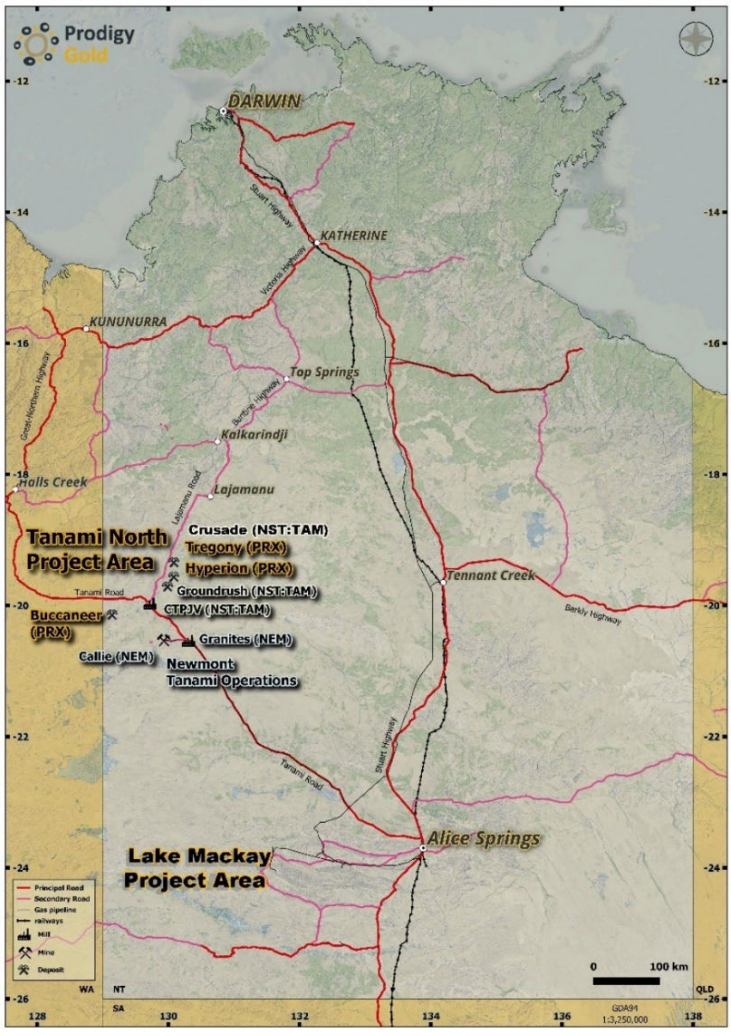

Figure 1 Regional location of Prodigy Gold's projects.

1.1 Project Background

Prodigy Gold's project areas are located NW of Alice Springs (Figure 1) and to the east of the Northern Territory and Western Australian border. The site is accessed from east and west by the Tanami Road, which runs Northwest from Alice Springs to the Northern Territory and Western Australian border (Figure 1). The project areas can also be accessed via Lajamanu Road which heads south from the community of Lajamanu which is north of the Tregony camp.

Prodigy Gold is active in the Tanami Region of the Northern Territory. The Tanami Region is divided into several sub-projects each with its own Mining Management Plan or plan in preparation. Those sub-projects are shown in Figure 2 and noted as:

- Tanami North Project area (Previously Suplejack Project)
- Hyperion Project area
- Tanami Project area – Currently included in the Stockton Mining Sales agreement.
- Lake Mackay Project area

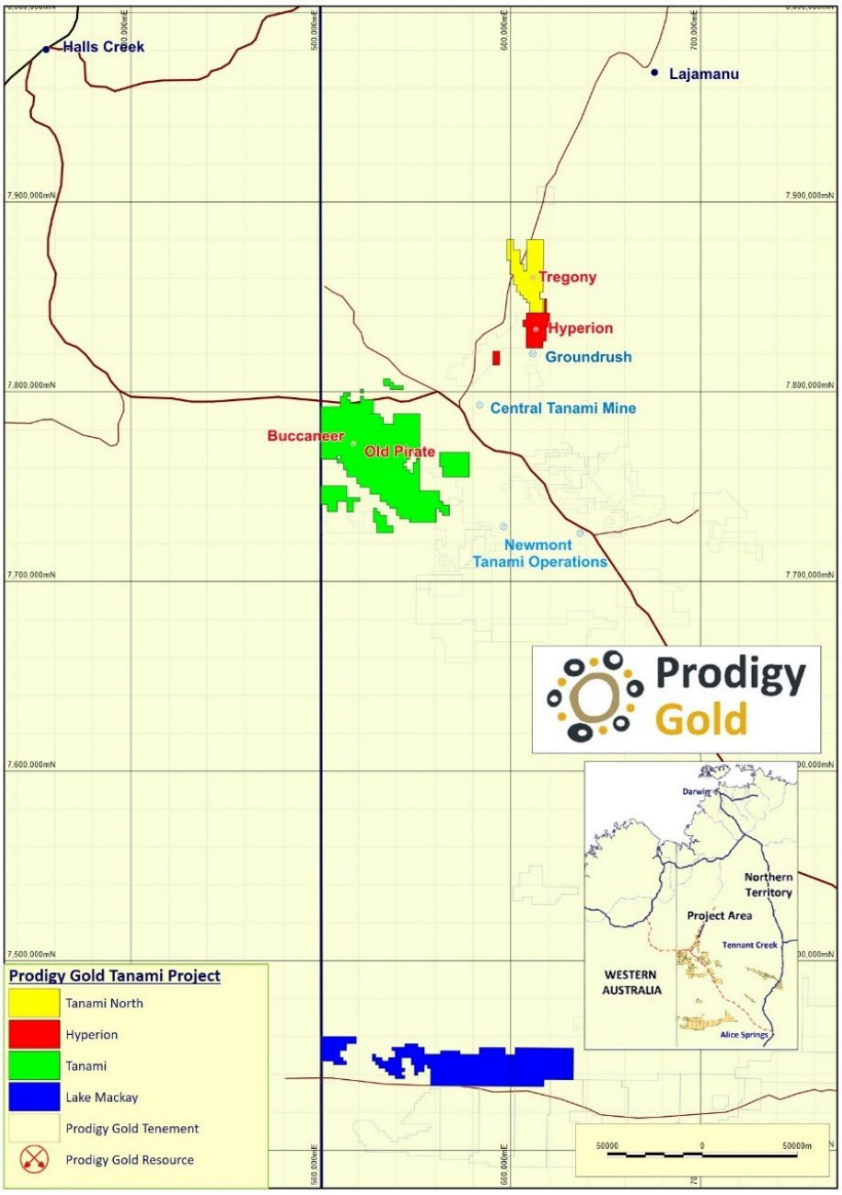

Figure 2 Prodigy Gold's Tanami Projects

Prodigy Gold's project areas are all located within the Central Land Council (CLC) area of influence.

While the primary source of information around archaeological protection is through the Heritage Branch, who oversee the protection of Aboriginal archaeological items and places as per *Heritage Act 2011*, the Aboriginal Areas Protection Authority (AAPA) who oversee the protection of Aboriginal sacred sites on land and sea across the whole of Australia's Northern Territory. Sacred sites protected by the Aboriginal Areas Protection Authority can be archaeological places with dual protection but it is recommended anyone working in areas where these sites are located refer to the AAPA for a better understanding of these scared sites. It is generally through the CLC that land access agreements and sacred site clearance certificates (SSCCs) are sourced, these must be completed under agreements in place for land use with the CLC and their Traditional Owners.

Under the *Heritage Act 2011* Applications to carry out works can be applied for if works propose to disturb an Aboriginal or Macassan archaeological place or object Aboriginal heritage information | NT.GOV.AU.

2. Objectives

This document has been developed by Prodigy Gold NL (Prodigy Gold) to provide the staff and contractors based on any of their projects with information and understanding of archaeology and heritage management policies and procedures. The objective of this Archaeology and Heritage Management Plan (AHMP) is to ensure that well defined practices are implemented on site to minimise the risk of damage, interaction or entering into areas of archaeological or heritage significance without the required permission or approvals. It has also been designed to provide information on how Prodigy Gold intends to manage these risks as part of Prodigy Gold's overarching environmental management, and health and safety systems.

The main objectives of the AHMP are to ensure:

- All personnel are aware of constraints imposed by archaeological, sacred and heritage sites.
- No Prodigy Gold staff or contractors interact, damage, or disrespect any sites of significance located on or near its exploration activities.
- All staff understand the importance of protecting areas of significance and ensuring they do not interact or enter these areas and ensure they remain protected by the Company.

3. Implementation

3.1 Responsibilities

All Prodigy Gold employees and contractors are responsible for the implementation of, and compliance with, this AHMP. Key personnel are responsible for communicating environmental matters and ensuring management practices and procedures are being implemented. Those key personnel are the Exploration Manager and the Managing Director.

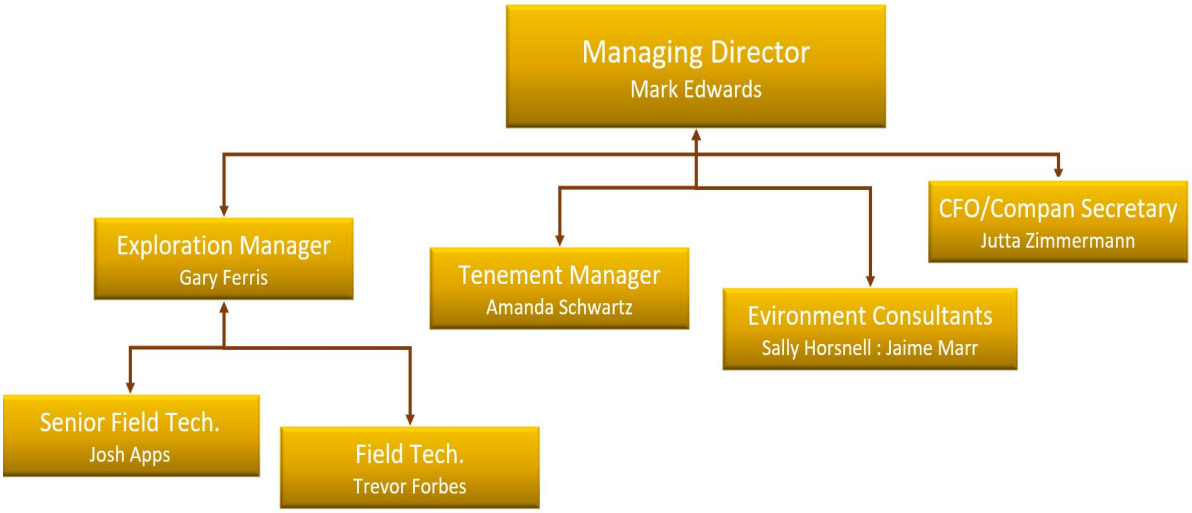

Figure 3 Prodigy's Management Structure

3.2 Environmental induction, training, and awareness

Managers are responsible for identifying training and competency requirements for personnel under their control, and for ensuring that personnel have the requisite competencies, skills and training to carry out their assigned tasks. Managers are also responsible for ensuring training records are maintained.

3.3 Induction

All staff, contractors, and consultants complete a site induction. The induction includes safety requirements, site behaviour rules, access protocols and restrictions, cultural requirements and commitments, and a comprehensive review of environmental risks, responsibilities and standards. This includes details around protected archaeological and heritage sites that could be present around project area.

3.4 Toolbox meetings

The Site Supervisor will hold regular toolbox talks with staff and crews to discuss issues associated with the scheduled work. The toolbox meetings will involve highlighting and discussing relevant environmental and safety issues. Toolbox meeting agendas, attendance and outcomes will be recorded and maintained, as they will form the mainstream of communication between upper management and on-site staff.

3.5 In-house training

Regular training will be offered for personnel; this will include, but not be limited to, training in pollution/spill management and response, incident reporting, weed, flora and fauna identification as well as cultural training when required, to assist with identifying potential un-recognised sites of cultural significance. The company will also ensure any staff who work in and around the project areas, have access to a digital platform that highlights areas that have been marked as exclusion zones as areas of archaeology or heritage significance. The staff will be trained in their use to ensure all works remain within areas that have been clear of cultural importance, contractors who also require this information will be trained as appropriate.

4. LEGAL REQUIREMENTS

4.1 Legislations and codes

The following legislation is applicable to the protection of sacred sites and sites of heritage significance in the Northern Territory (NT) and to Prodigy Gold:

- *Aboriginal Land Rights Act 1976* (NT)
- *Aboriginal Land Act 1980* (NT)
- *Aboriginal Sacred Sites Act 1989* (NT)
- *Heritage Act 2011* (NT)
- *Mining Management Act 2011* (NT)

Prodigy Gold will adhere to all relevant legislation and clearance requirements as outlined by the CLC and other regulatory bodies. Prodigy Gold will specifically undertake annual reviews of all SSCCs and relevant heritage reports to ensure all protected sites are noted before on ground works re-commence during the dry season.

4.2 CLC Exploration Agreements and supporting requirements.

Prodigy Gold has several Deeds for Exploration in place with the CLC, these contain significant information around how the exploration activities can be completed and what is required in terms of clearances. Within these Deeds are several articles, for the purpose of this management plan several are significant, namely:

- Article 7: Protection of Sacred Sites and Aboriginal Interests
- Article 8: Work Programs
- Article 9: Roads, Materials and Water
- Article 10: Environmental Protection & Rehabilitation
- Article 12: Permits
- Article 14: Instruction on Aboriginal Culture

While the specifics or the Deeds are confidential, it is important that Prodigy Gold Staff and Contractors are aware of these conditions. The key elements of these Articles are outlined below.

4.2.1 Article 7 – Protection of Sacred Sites and Aboriginal Interests

Prodigy Gold agrees that the purpose of the Deeds of Exploration is to provide effective arrangements to avoid disputes in relation to Sacred Sites and to ensure no exploration works commence without complying with the Sacred Site Protection Procedures outlined in the agreements.

This article also outlines what should occur if the Company identifies any archaeological or historical site or object, or any Sacred Site or object (not being a Sacred Site previously advised to the Company), on the License Area then it must promptly report the finding to the CLC and Heritage Branch (s114 of the *Heritage Act 2011* NT).

Also, within this article, there is outlined the process of what should be done if access or damage to a Sacred Site occurs. This must be followed by all Prodigy Gold staff or contractor.

4.2.2 Article 8 – Work Programs

Prodigy Gold must provide work programs to the CLC every year outlining the planned works to occur over the coming field season. New work programs need to be submitted to the CLC for approval and consultation ever third year. These work programs must include the required level of detail, such as types of works (drilling, sampling for example) location of works and must also include suitable maps and figures.

These work plans will be reviewed by the CLC to determine the clearances required, which may be through a review of available data, a desk top review or on ground clearances depending on the assessment of the work program plans as provided by Prodigy Gold.

4.2.3 Article 9 – Roads Materials and Water

Under the Deeds of Exploration, Prodigy Gold will be responsible for maintaining all roads and accesses for the exploration project areas. The CLC may request to use these accesses at times and may take over responsibility in writing.

Importantly, Prodigy Gold cannot use surface water without the specific permission of the CLC in writing.

4.2.4 Article 10 – Environmental Protection and Rehabilitation

Under the Deed of Exploration, Prodigy Gold agrees to protect and conserve the environment including the hydrological systems. Prodigy Gold also agrees to minimise the amount of disturbance to vegetation and soils on the project and minimise pollution.

It is also required that Prodigy Gold completes progressive rehabilitation during the exploration activities which is now common practice.

4.2.5 Article 12 – Permits

All employees, agents and Contractors of the Company who hold permits issued under the Deeds for Exploration are entitled to enter the License Area for the purposes authorised by the Deed. Each person must have a permit before they enter the exploration areas.

Any Prodigy Gold Staff or contractor must abide by the actions as included in the Deed for exploration, including respecting and not entering sacred sites.

4.2.6 Article 14 – Instruction on Aboriginal Culture

Prodigy Gold staff and contractors are to be given appropriate instructions to ensure they are familiar with Aboriginal Traditions and culture and foster good relationships between Aboriginal and non-Aboriginal people. This will ensure that Prodigy Gold staff and contractors understand the importance of protecting areas of significance in and around the projects that they work on.

4.2.7 Other Articles within Deed of Exploration

Several other articles are included in the Deed of Exploration for the projects, these are reviewed by management and will be communicated to all Prodigy Gold staff and contractors as required. Generally the agreements are confidential so will not be supplied in complete form but these articles are critical to the exploration operations and therefore must be communicated.

4.3 Heritage Register Review

A review of the NT Government and Heritage Council heritage register has shown no registered sites within the NT Portions that Prodigy Gold works within. Therefore, no sites have restricted access for recent heritage sites. The only registered sites recognised on Prodigy Gold work areas are based on

Aboriginal Heritage and Sacred Sites with areas of significance in and around the company's work areas displayed on working tablets and maps to ensure compliance with Prodigy Gold's agreements as well as the relevant legislation.

If a site of potential significance is discovered within Prodigy Gold work areas, this will be reported to Management and will be reported to the Department of Territory Families, Housing & Communities – Heritage Branch, as required under section 114 of the Heritage Act (NT) 2011

4.4 Reporting Requirements

4.4.1 Mining Management Plan

Prodigy Gold will submit an updated Mining Management Plan (MMP) as required under section 41 (1) of the *Mining Management Act 2011* (NT*)* annually, or as requested by the Minister, or if any amendments to an approved exploration program in an MMP are proposed. A revised version of the AHMP will be included if any significant changes are made.

4.4.2 Incident reporting and non-conformance

An incident report form is to be completed to record any safety or environmental non-conformances or incidents. The incident report form is to be forwarded to the Exploration Manager or their delegate. Significant incidents will be reported to the Department of Industry, Tourism and Trade (DITT) in accordance with the requirements of Section 29 of the *Mining Management Act 2011*.

Incidents will be investigated and, where relevant, corrective actions nominated and implemented. In addition to this, Prodigy Gold ensures the correct department or CLC representatives are notified of the incident. The Exploration Manager or their delegate are responsible for ensuring all incidents are thoroughly investigated, managed accordingly, reported to the DITT, and included in the annual MMP update. The Company Managing Director will be responsible for reporting the incident to the required department and the CLC as required.

4.5 Document management.

Any improvements identified during implementation of the management plan will be incorporated into the AHMP which will be reviewed regularly and updated as required.

4.5.1 Maps and Tablets

Generally, maps and tablets will be made available to Prodigy Gold staff and contractors if works are in close proximity to areas of cultural significance. These maps must remain confidential; however, they will be constructed in a manner that is consistent, so staff have the ability to understand the elements of the drawing.

An example of a map is shown below, the example has no reference to an actual area and is only supplied to illustrate the way maps will be provided.

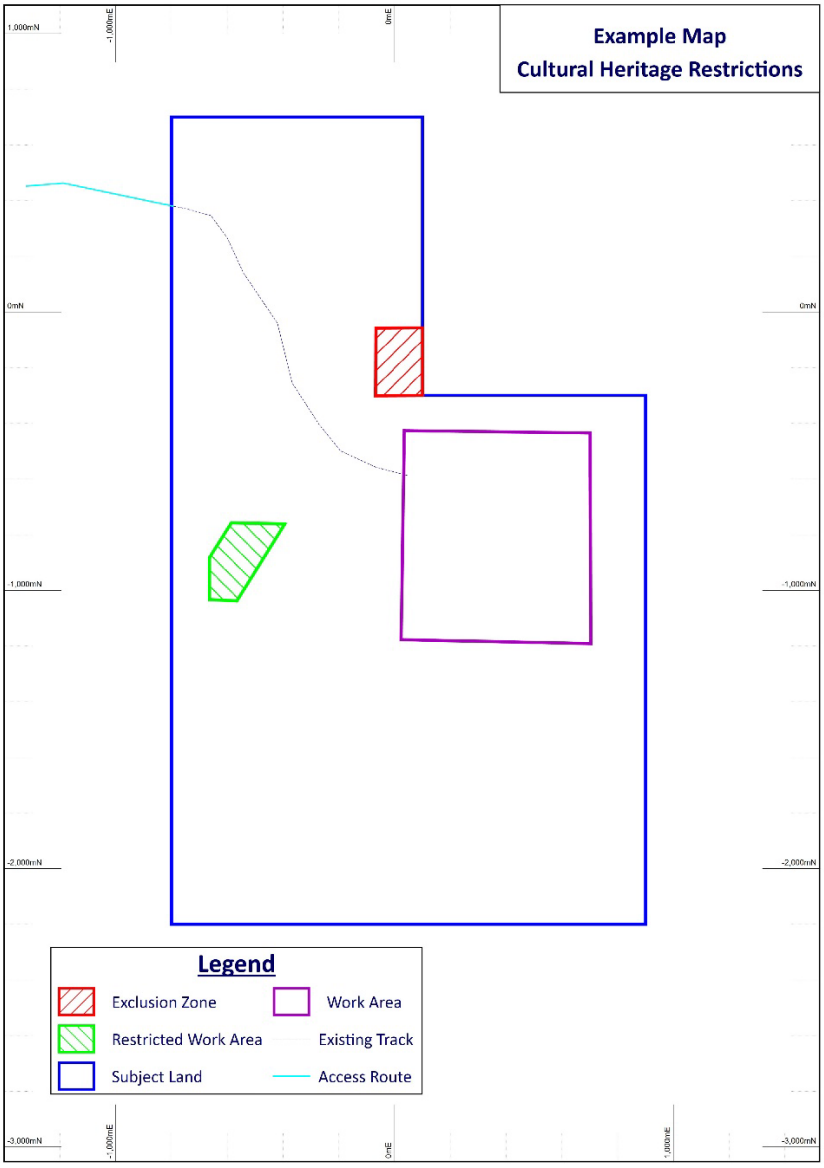

Figure 4 Example map showing typical layout of cultural heritage sites in Prodigy Gold work areas.

4.6 Monitoring

Monitoring will be undertaken to verify compliance with cultural and heritage commitments, as part of the exploration activities and rehabilitation process. This shall be recorded in the monthly reports, completed by the exploration team, and reported through to the board.

5. ARCHAEOLOGY AND HERITAGE MANAGEMENT PLAN SUMMARY

ARCHAEOLOGY AND HERITAGE MANAGEMENT	
OBJECTIVES	All personnel are aware of constraints imposed by archaeological, sacred and heritage sites. No Prodigy Gold staff or contractors interact, damage, or disrespect any sites of significance located on or near its exploration activities. All staff understand the importance of protecting areas of significance and ensuring they do not interact or enter these areas and ensure they remain protected by the Company.
TARGETS	Exploration activities do not damage or violate constraints on activities permitted in relation to archaeological, sacred or heritage sites. Identified archaeological, sacred or heritage sites are reported to relevant authorities and reporting bodies.
ACTIONS	Induction will document sacred sites, areas of Aboriginal significance, archaeological sites and heritage areas and the following requirements: • the Central Land Council (CLC) conducts anthropological/cultural heritage surveys of each tenement based on the impact/intensity of planned exploration • the CLC subsequently notifies Prodigy Gold of any exclusion zones for protection of any identified sacred or significant cultural sites. • as required by the Deeds for Exploration and Indigenous Land Use Agreements (ILUA), Prodigy Gold will record the location of any discovered area of Aboriginal significance and inform the CLC and the Aboriginal Areas Protection Authority. • sacred sites and CLC exclusion zones will be avoided. • archaeological sites will be protected, avoided, not disturbed and locations reported to the Heritage Branch of the Department of Territory Families, Housing & Communities. • locations of newly discovered historic / Aboriginal sites are to be recorded by the Project Geologist and communicated to the CLC and the Aboriginal Areas Protection Authority.
MONITORING	Known sacred sites, Aboriginal sites and archaeological sites will be monitored during exploration activity to ensure none are disturbed or interfered with. GPS devices only accessible to Prodigy staff will have no-go zones loaded to avoid accidental entry into exclusion zones.
REVIEW & REPORTING	The Site Supervisor / Environmental Manager will keep records of the locations of all known sites, report new sites to CLC, the Aboriginal Area Protection Authority and the Heritage Department of the Department of Territory Families, Housing and Communities as appropriate. Accidental or other disturbance to sites will be recorded by the Project Geologist and reported to the Site Supervisor and Environmental Manager, CLC and Department of Territory Families, Housing and Communities as appropriate.

6. REFERENCES

6.1 Legislation

- *Aboriginal Land Rights Act 1976 (NT)*
- *Aboriginal Land Act 1980 (NT)*
- *Aboriginal Sacred Sites Act 1989 (NT)*
- *Heritage Act 2011 (NT)*
- *Mining Management Act 2011 (NT)*

Other tools for ensuring compliance with this management plan include;

- Heritage website –
  https://www.ntlis.nt.gov.au/heritageregister/f?p=103:300:13384641328571
- AAPA Factsheet
  https://www.aapant.org.au/system/files/uploads/files/2024/AAPA%20Authority%20Certificate%20Fact%20Sheet.pdf

7. DOCUMENT CONTROL AND REVISION HISTORY

7.1 Document information:

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Approved by	Managing Director
Document Owner	Exploration Manager
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Keywords	

7.2 Revisions

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2			
3			

7.3 Read by

READ BY	SIGNATURE	DATE
G Ferris		15/01/2024