ENVIRONMENTAL MANAGEMENT SYSTEM

This environmental management system (EMS) was developed to ensure that appropriate environmental practices are identified and implemented during the various stages of an exploration project. This EMS is a working document that is periodically reviewed and amended throughout the project life to reflect changing environmental conditions, legislation and developments.

For PRODIGY GOLD NL Exploration Activities

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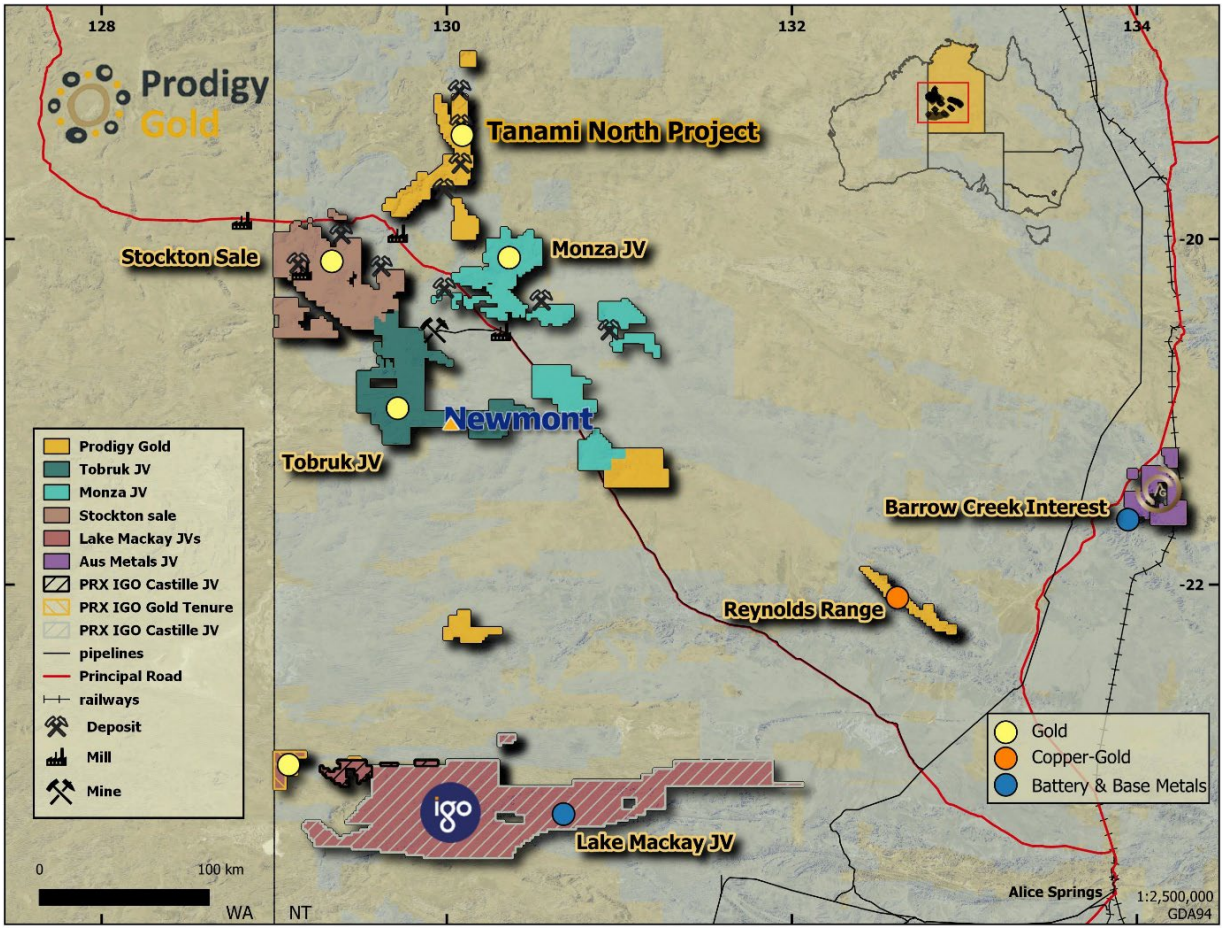

Figure 1: Overview of all Prodigy Gold's Exploration Projects in the Northern Territory

1. PROJECT OVERVIEW

1.1. Proponent Details

Prodigy Gold NL (Prodigy Gold) is a publicly listed company (Australian Stock Exchange code PRX), exploring for gold in the Tanami Region of the Northern Territory. The following Environmental Management System (EMS) has been developed by the Prodigy Gold team to align with environmental regulations/legislation and laws which sets targeted environmental outcomes relating specifically around exploration activities in the greater Tanami Region of the Northern Territory. From initial reconnaissance works to drilling for mineralisation, Prodigy Gold will ensure its activities are undertaken with regard to the surrounding environment, ecosystems and cultural heritage with ideals to minimise the effect to these areas. Prodigy Gold is committed to its environmental policies and Environmental Management Plans which cover our tenure in the Northern Territory. These will be supported by the generation of project specific Exploration Mine Management Plans (MMPs) which will use this EMS as the framework on how to manage environment and cultural heritage effectively and efficiently.

This EMS is designed to cover Prodigy Gold's main and active exploration projects which are located in the broader Tanami Desert region of the Northern Territory (Figure 1) and consists of;

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

These specific locations of these projects are shown in Figure 2 below.

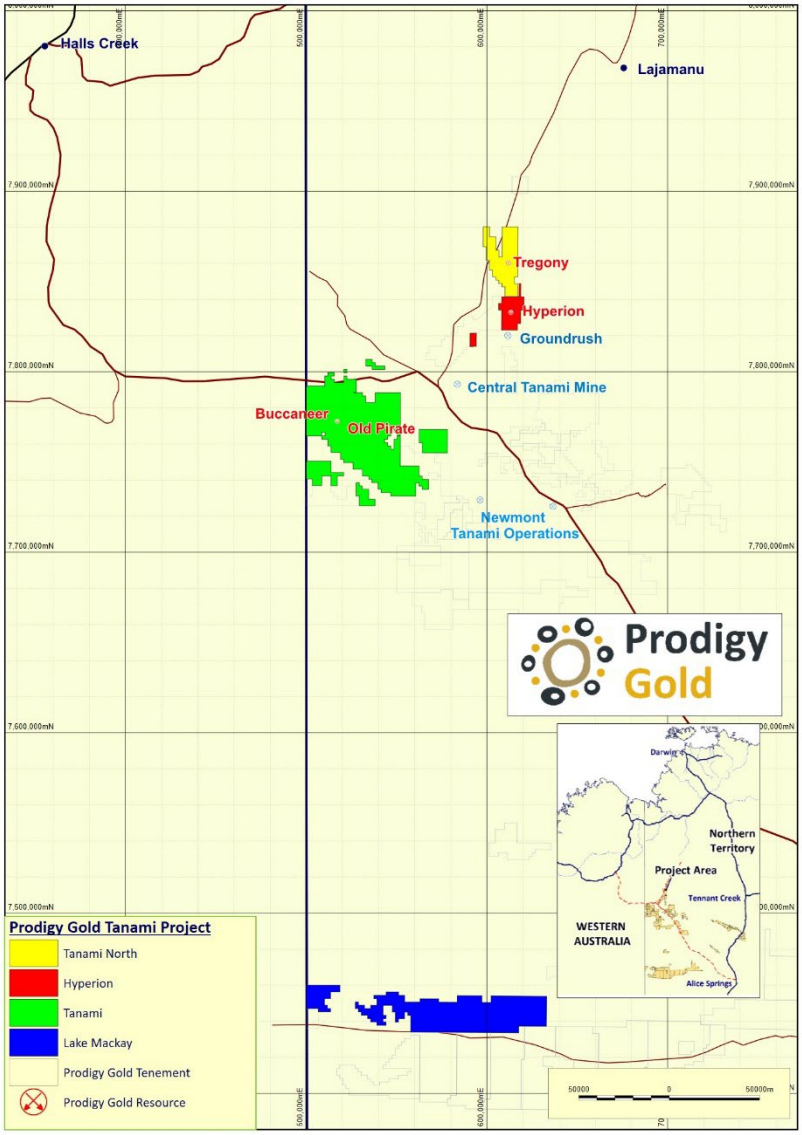

Figure 2 Locations of projects covered by this EMS

The Tanami North Project area is located within the Suplejack Pastoral Lease and hosts the Tregony Mineral Resource. The closest major settlements are Lajamanu, approximately 125km to the northeast and Halls Creek located in Western Australia, approximately 260km to the west. Access to site is via the Tanami Road, then via the Lajamanu Road.

Prodigy Gold's Hyperion Project is located 400km west of Tennant Creek and 300 km southeast of Halls Creek and hosts the Hyperion Mineral Resource. The Tanami Road is the main access route through the area. The Hyperion project is accessed from the Tanami Road via the Lajamanu Road and or Groundrush haul road and various access tracks established by previous explorers and operators.

Prodigy Gold's Tanami Project is located 400km west of Tennant Creek and 300 km south of Halls Creek. The Tanami Road is the main access route through the area. Site accessed is gained from the Tanami Road and via the Twin Bonanza access road to Wilson's Camp.

The Lake Mackay Project is 400 km west-northwest of Alice Springs and extends from the West Australian Border directly eastwards to the Newhaven Wildlife Sanctuary. It is accessible from Alice Springs either via the Namatjira Drive on to the Kintore Road, or the Tanami Road on to the Newhaven sanctuary access road, through to Nyirripi. The Kalipimbut Road from Sandy Blight Junction is used for access to central areas of the project. The project is close to several Aboriginal

Communities, including Kintore, Nyrripi, Papunya and Mount Liebig. Kintore is the closest community to most of the project's activities and is only 25 km from Sandy Blight Junction.

Key Personnel/Contacts

Mr Mark Edwards	Managing Director.
Mr Gary Ferris	Project Manager
Ms Jutta Zimmermann	CFO

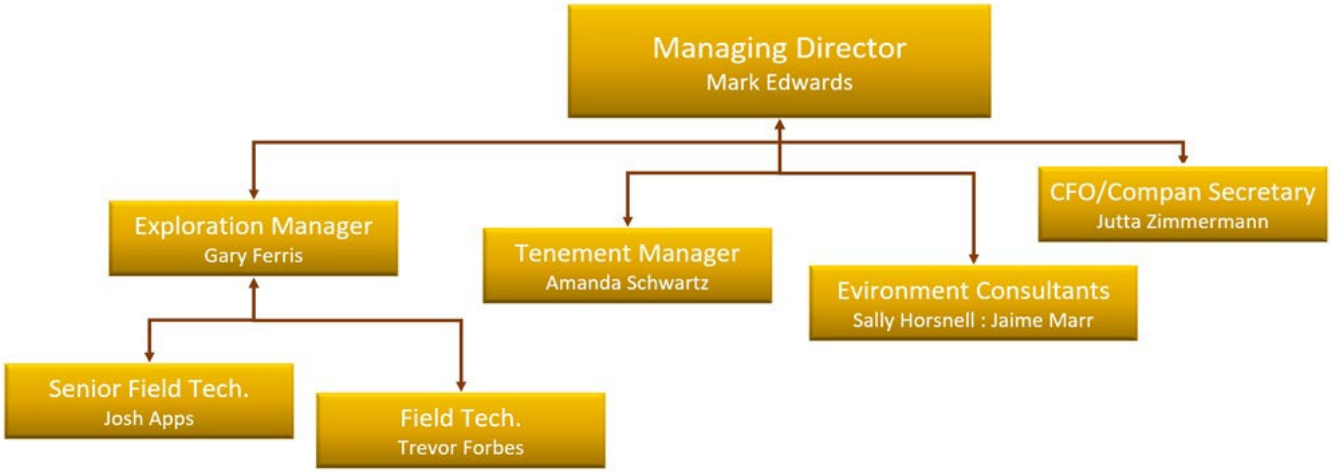

Figure 3 organisation structure for Prodigy Gold

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The Site/Project Supervisor will be recognised as the most senior employee at site at any time, this position may be delegated by the Exploration Manager as required. If the Exploration Manager is on site, then this role is assigned to them unless delegation is required (for example if Manager is completing remote works away from the main camp). One Prodigy Gold employee must be recognised as the Site/Project Supervisor at all times while exploration works are being conducted in the Tanami Region.

1.2. Overview

This Environmental Management System (EMS) comprises of procedures used by Prodigy Gold which enable our staff to develop, implement, maintain and review this EMS and Exploration MMP's during exploration field activities.

Prodigy Gold has developed its EMS, in line with the regulations stipulated with the Commonwealth, Northern Territory and local government statutory requirements. The pieces of legislation which dictates Prodigy Gold's exploration in the Northern Territory are shown in Table 1:

Table 1: Primary legislation applicable to exploration projects in the Northern Territory

Legislation	Comment
Aboriginal Land Rights Act (NT) 1976	Deed for Exploration with the Central Land Council (CLC) in respect of tenements on ALRA land.
NT Aboriginal Land Act 1980	Requirement for permits for entry onto Aboriginal Land
NT Aboriginal Sacred Sites Act 1989	Duty to report and protect Aboriginal archaeological and historic sites
NT Bushfires Management Act 2016	Provides the framework to manage bushfires in remote terrain to manage potential impact on staff and property
NT Heritage Act 2011	Duty to report and protect places and objects of historical and archaeological significance
NT Mineral Titles Act 2010	Exploration Licences granted under the terms and conditions of the Mining Act
NT Mining Management Act 2011	Authorisation issued for ground disturbing activities
Commonwealth Native Title Act 1993	Indigenous Land Use Agreement with Central Land Council in respect of tenements on Pastoral Land
NT Plant Health Act 2008	An Act for the control of pests, certification of plant health and related purposes.
NT Water Act 1992	An Act to provide for the investigation, allocation, use, control, protection, management and administration of water resources.
NT Weeds Management Act 2001	Responsibility to prevent the spread noxious weeds
NT Work Health and safety (NUL) Act 2011	An act to promote health and safety in the workplace
Commonwealth Environment Biodiversity Protection Act (1999)	The EPBC Act focuses Australian Government interests on the protection of matters of national environmental significance, with the states and territories having responsibility for matters of state and local significance.
Soil Conservation and Land Utilization Act 1969	An act to make provision for the prevention of soil erosion and for the conservation and reclamation of soil.
Territory Parks and Wildlife Conservation Act 1976	An act that provides for the protection of animals and plants and the preparation of plans of management for parks and reserves.

Prodigy Gold's current Environmental Management Plans and this Environmental Management System have been designed to incorporate the above legislation into their current Procedures. These are:

- Environmental Emergency Procedure
- Drill Hole Rehabilitation Procedure
- Hydrocarbon Spill Procedure
- Bushfire Emergency Response Procedure

2. ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1. Environmental Policy and Environmental Management System (EMS)

Prodigy Gold's environmental management framework is shaped by:

- Prodigy Gold's Environmental Management System (EMS), is a three-tiered system with Corporate Policies (Community and Environment Policy) at the top, setting out the goals of the system. The second tier comprises this EMS, determining how the system should run, which is outlined in detail in the Environmental Performance and Management Standards. Finally, the third tier comprises the Specific Management Plans which detail precisely how Prodigy achieves their environmental standards and goals. There is a fourth tier that includes the Prodigy Gold exploration procedures, these are internal documents that can change regularly or be more specific to each project, so these are not included in this EMS but go a long way to support environmental and cultural management of the Prodigy Gold projects.
- Prodigy Gold's Exploration MMPs are informed by Prodigy Gold's management plans and feeds back to Prodigy Gold's EMS. The Exploration MMPs forms part of Prodigy Gold's Specific Management Plans, see Figure 3 below.

An EMS is a structured system designed to help organisations manage their environmental impacts and improve environmental performance caused by their products, services and activities. An EMS has been developed by Prodigy Gold to identify and manage environmental and cultural heritage impacts associated with Prodigy Gold's exploration operations, which mainly comprise of standard exploration activities such as field mapping, geochemical sampling, geophysical data capture and drilling.

Prodigy Gold's exploration MMPs are aligned to the EMS and therefore the Exploration MMPs apply to all Prodigy Gold exploration activities and include all Prodigy Gold employees, contractors and their employees, other third parties and visitors. Contractors performing services for Prodigy Gold will be required to adopt measures which comply with these management systems/plans.

2.2. Environmental Risk Management

An "Aspects and Impacts Register" has been included in Appendix 1 which provides a summary of the risks and impacts that this projects exploration activities could have on the environment and then sets the objectives and targets as detailed in the respective management plans. The register is a combination of all high to extreme potential risk category aspects, with any other moderate consequence aspects of moderate rating also included. Each management plan has been addressed within a companywide risk assessment addressing how the identified risks are evaluated and treated and mitigated, the responsible persons to provide informed and appropriate management/control measures is shown in Table 2 below. This risk assessment was used to inform the Aspects and Impacts Register with all inherent risks rated at High or above included. Several moderate risks were also included if the Consequence was deemed to be moderate or higher.

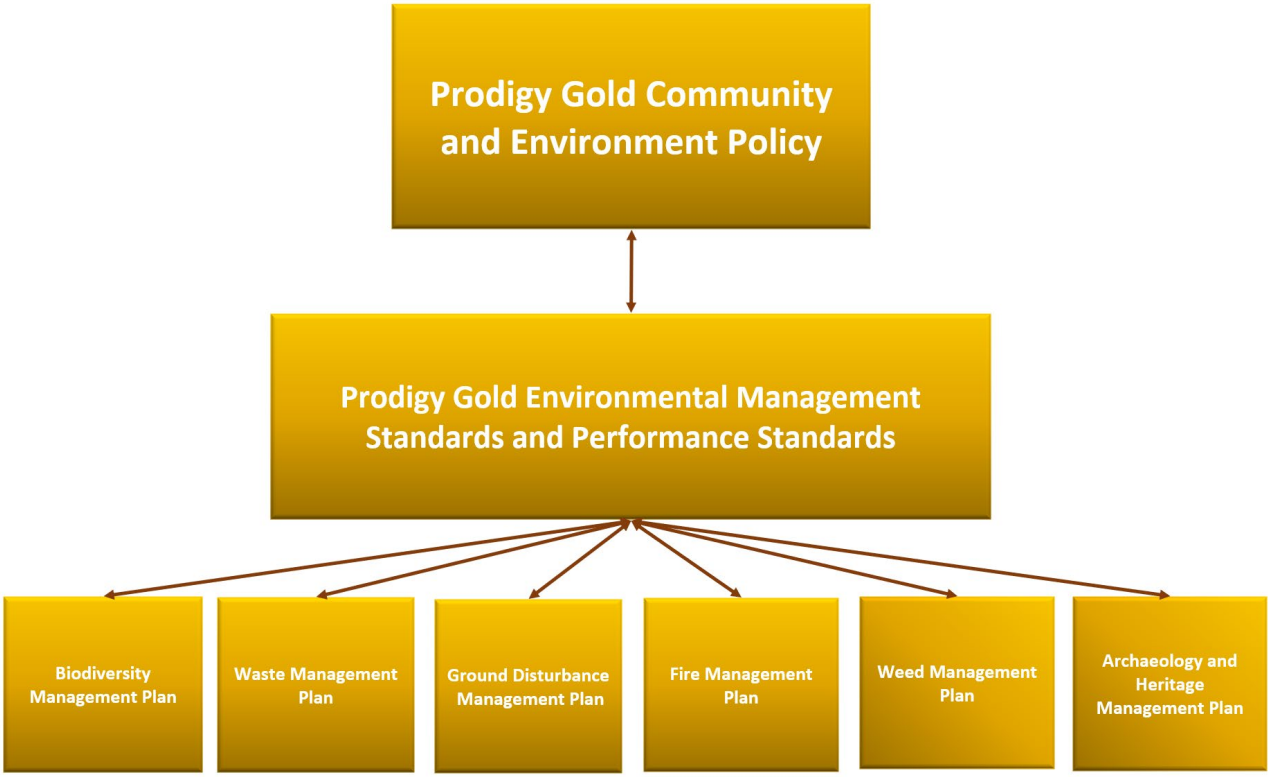

Figure 4 Prodigy Gold's Environmental Management Framework

2.3. Environmental Responsibilities and accountabilities

All parties working with, or for, Prodigy Gold have a Duty of Care to prevent environmental and cultural heritage harm, or, where environmental or cultural heritage harm is observed, to report all incidents to their manager/supervisor. When required under Section 29 of the *Mining Management Act* environmental incidents will be reported to the Department of Industry, Tourism and Trade (DITT) by senior Prodigy Gold personnel with incidents outside the exploration leases reported directly to the Northern Territory Environment Protection Authority (NTEPA).

The Organisational structure of the company is shown in Figure 2 above. The allocation of responsibilities for implementation of environmental management tasks is shown in Table 2, followed by a description of environmental responsibility for each role in Table 3. Ultimately the senior officers of Prodigy Gold will be held accountable for the performance of the company under this EMS, the accountable position will the Managing Director.

Table 2: Showing environmental responsibilities in exploration team

Responsibility	Personnel
Monitor overall performance	**Managing Director**
Ensure regulatory compliance (external)	**Managing Director**
Ensure the EMS compliance (internal)	**Exploration/Project Manager**
Update and maintain the EMS	**Exploration/Project Manager**
Ensure continuous improvement	**Exploration Team**
Develop and maintain environmental management procedures	**Exploration/Project Manager**

Table 3: Showing the roles and responsibilities for EMS implementation.

Position/Role Responsible	Item
Managing Director	Held accountable for the performance of the company with this EMS
	Be informed of the requirements of this EMS
	Be aware that the EMS is to be updated, finalised and approved by DITT
	Review and update the EMS every twelve months or as required (if more frequent) e.g. significant changes to activities and management are proposed
	Review and monitor environmental performance at regular intervals / meetings / hold points etc.
	Induct and train staff and / or contractors so they are able to meet Prodigy Gold's requirements, the requirements of the EMS, and follow the necessary procedures
	Ensure that the management and staff are familiar with the EMS and aware of their responsibilities and the consequences of their actions
	Inform the Logistics Manager and / or Project Geologists of any site specific environmental performance related requirements (i.e. guidelines and procedures)
	Required to be notified of any major environmental incidents and review the management procedures in place to deal with such occurrences
	Report any complaints received related to the undertaking of the works and to investigate the complaint.
	Ensure all Prodigy staff are undertaking works in compliance with the final EMS and understand their responsibilities under the EMS (including inductions)
	In the event of a non-conformance with the requirements of this EMS, the Site Supervisor is to make certain corrective actions are implemented satisfactorily and in an appropriate timeframe.
	Monitor non-compliance and review management procedures if a problem persists
	Facilitate the monitoring / reporting of incidents that may impact on the surrounding environment
	In the event that a complaint is shown to be legitimate, undertake appropriate actions to prevent further complaints
Exploration Manager	Ensure that the management and staff are familiar with the EMS and aware of their responsibilities and the consequences of their actions
	Provide guidance and advice to staff with regard to environmental management requirements
	Where necessary, coordinate and/or assist in the response to environmental incidents
	Report all incidents with the potential to cause serious environmental harm to the Environmental Manager and where necessary to DITT and as required NT EPA
	To ensure that all relevant licences/permits/approvals are in place prior to any works that requires them
Project Supervisor	Carry out work in accordance with the requirements of the final EMS;
	Make all staff and Contractors aware of the requirements of the final EMS and any Prodigy site specific procedures;
	Consider and advise on matters specified in the requirements of this plan and comply with such requirements
	Keep a register of all environmental accidents/incidents, non-conformances and complaints
	Provide the Site Supervisor with a copy of all documented accidents/incidents, non-conformances and complaints.

	Carry out environmental audits/inspections/monitoring to verify compliance with the EMS.
	Carry out compliance investigations and report complaint investigation findings to the Site Supervisor.
	Report all non-conformances to the Site Supervisor in accordance with the set procedure.
	Correct all non-conformances to the satisfaction of the Environmental Manager in the timeframe specified
	Report on the implementation and effectiveness of corrective actions specified by the Site Supervisor or implemented to ensure correction of non-compliances;
	Identify, obtain and hold on site any other license, permit, certificate or approval needed to undertake work.
	Train field staff so they are able to implement the requirements of the final EMS.
Site Personnel	Carry out work in accordance with the requirements of the final EMS
	Comply with all permits, approvals and subsequent plans associated with these works
	Comply with all relevant legislation, guidelines and standards

2.4. Environmental Management System (EMS)

The EMS is organised around each of the below environmental elements (water, air quality, noise, ground disturbance, fauna and flora (Biodiversity), weeds, waste products, fire, biting insects, erosion and sediment control, archaeological and heritage sites and rehabilitation) and the exploration activities that may impact each element. Management of elements is structured as table following a description of each element.

ENVIRONMENTAL ELEMENT	
Objective	The guiding environmental management objective/s and activities that apply to the element.
Target	Sets the benchmarks by which the successes of the management strategies are judged.
Actions	The procedures to be employed to ensure that the relevant objectives are met.
Monitoring	The process of measuring actual performance, or how well the objective has been achieved. This includes the format, timing and responsibility for reporting and auditing of the monitoring results
Review & Reporting	The action to be implemented in the case of non-compliance. This includes strategies of remediation and the person(s) responsible for the actions

2.4.1. Biodiversity Management

Flora and fauna considerations need to be understood during exploration in the Tanami region. There are noted flora and fauna species that are of note in the region and must be protected during exploration works. The biodiversity management plan addresses both the flora and fauna species in the Tanami Region.

BIODIVERSITY MANAGEMENT	
OBJECTIVES	To minimise disturbance and potential impact to flora and fauna as far as practicable, particularly flora and fauna at risk. To avoid introduction of non-native flora and fauna species. To avoid interaction with flora and fauna as far as practicable.
TARGETS	No impact on native flora (i.e. destruction or disturbance) and fauna (i.e. injuries or death), especially species of conservation significance. No introductions of non-native flora and fauna species. No loss of viable topsoil during clearing processes No vegetation clearing beyond approvals
ACTIONS	To dissuade dingoes and other scavengers (i.e. feral cats) from entering camps, food scraps are to be burnt, standing water is to be avoided and feeding and any other interaction with fauna is not permitted. Field personnel are prohibited from killing or attempting to handle snakes and any other fauna. Dangerous snakes are encouraged to leave the camp or worksite and if this is unsuccessful, they may be relocated unharmed. Field personnel are not permitted to bring any domesticated animals to the Project Area and are prohibited from interacting or interfering with any wild fauna. Areas proposed to be cleared for tracks or future drill pads are inspected for burrows or protected flora prior to vegetation clearing. If any sign of habitation of bilby or mulgara are detected within the proposed areas of disturbance the areas will be avoided, Keep vehicle speeds to a minimum and avoid driving during periods of peak fauna activity (e.g. sunrise/sunset, night-time). Vehicles and equipment entering/leaving the Project Area should be inspected and cleaned to lower the probability transporting small species of introduced animals (e.g. rodents, ants). Sites to be inspected before clearing to ensure no protected flora species are located or in danger of being damaged/removed
MONITORING	Regular inspections of work sites, tracks and camp areas. GPS coordinates & photographs of suspected evidence of significant flora (eg Desert Walnut and Bloodwood species) and fauna, such as scats, tracks, scratchings or burrows, to be recorded by field personnel. Records in Environmental Observations and Incident Register.
REVIEW & REPORTING	Report any significant flora damage and fauna deaths (i.e. species of conservation significance) as an incident to DITT, in accordance with requirements of Section 29 of the *Mining Management Act*. Report any high density populations of feral animals (e.g. camels) to government authorities (e.g. DLRM).

	Review of data and summary of fauna injuries/deaths in annual MMP reporting.

2.4.2. Waste Management

Waste will also be a consideration for exploration works in the Tanami, as Prodigy Gold has bases in the region where staff are located during the field season, it is important that the company manages any waste that is produced to reduce the threat of feral pest and weeds as well as potential harm to the environment (fires for example).

WASTE MANAGEMENT	
OBJECTIVES	To avoid and minimise the production of waste. To prevent wastes from contaminating the surrounding environment. To manage and control disposal of all wastes. To maximise the recycling/re-use of waste wherever possible.
TARGETS	Achieve efficient waste management by: • optimising the processes/products that produce minimal waste requiring disposal • not contaminating surrounding environment • maximising the principles of avoid, reduce, reuse and recycle wherever possible • safely disposing of non-reusable and non-recyclable materials. • identify the types and sources of waste produced; • detail the methods of disposal for each identified waste product; • outline waste reduction methods; • detail monitoring requirements and methods for a number of waste products; • outline clean up and remediation techniques for potential spills and leaks of various waste products; and • set methods and targets for the reduction of waste production.
ACTIONS	Employ principles of avoid, reduce, reuse and recycle wherever possible. All non-biodegradable waste (e.g. plastic, steel, aluminium) is removed from drill sites and mobile camp and relocated to Permanent Camps or a waste recycling facility (i.e. Alice Springs Council Waste Site or Halls Creek Waste Facility). Certain waste materials (i.e. cardboard, food scraps) will be burnt on site in a designated burn pit to reduce the risk of attracting fauna. Waste that may cause contamination (e.g. waste oils) is to be stored appropriately (see Dangerous Goods Management) and removed from site for disposal of at a suitable facility in Halls Creek or Alice Springs. Wastewater from toilets will be managed via a leach system. Grey water from showers and kitchen caravan will be sent from an approved portable septic tank to a leach drain away from camp as approved by the Department of Health.
MONITORING	Regular inspections/audits by the Site Supervisor of camp and operational areas to ensure that waste is being managed appropriately. Records kept of waste disposed to licenced facilities.
REVIEW & REPORTING	Include summary of inspections/audits and waste management activities (including recycling) in annual MMP update.

2.4.3. Ground Disturbance Management

Prodigy Gold will actively disturb the local environment to allow for exploration activities to be completed. Through the careful management of this process, the damage to the environment can be reduced and the cost of rehabilitation can also be mitigated.

GROUND DISTURBANCE MANAGEMENT	
OBJECTIVES	To minimise disturbance to vegetation and soil as far as possible. To avoid disturbance to key vegetation communities that may impact on significant fauna species. To ensure protection of significant flora and fauna is maintained in support of the Prodigy Gold Biodiversity Management Plan (BMP)
TARGETS	No disturbance to key vegetation communities. Minimise disturbance of areas with higher risk of soil erosion. No damage to Desert Walnut, Bloodwood and minimal disturbance to mature trees exceeding two metres, as required under Aboriginal Land Access agreements.
ACTIONS	Inductions, training and supervision of exploration personnel to ensure clearing is kept to a minimum. Utilise existing roads, tracks, fence lines or open cross country routes to gain access into a tenement or prospect area. Avoid long straight traverses and follow contours as much as possible. Use of appropriate machinery where practicable. Always use blade up clearing techniques that cut vegetation at the stem while leaving the root stock in situ, thus minimising soil disturbance. Where possible, avoid clearing drill lines by traversing cross country. Utilise solid tyres for drilling equipment and support vehicles. Avoid significant vegetation by altering the positioning of tracks, pads and camps. Limit drill pads and trench sizes to reflect operational requirements whilst achieving minimal disturbance. Field personnel to be familiar with identification of Desert Walnut and Bloodwood species (i.e. through induction process) and avoid areas containing these species. Notifying site supervisor if these types of vegetation are recognised in the field. Avoid field activities during wet conditions to minimise risk of vehicle/equipment bogging. Suspending works if unexpected rain events occur
MONITORING	Regular inspections of work sites, tracks and camp areas, including photo monitoring. Rehabilitation to occur as soon as practical. Records in Environmental Observations and Incident Register.
REVIEW & REPORTING	Report any significant disturbance to key vegetation communities as an incident to DITT, in accordance with Section 29 of the *Mining Management Act*. Review of monitoring data and summary of disturbance activities in annual MMP reporting.

2.4.4. Fire Management

Fires are banned during the course of normal field work activities excluding campfires and barbecues which are permitted in designated areas under controlled conditions. To prevent the potential for site activities to modify fire regimes with the surrounding environment the measures detailed below will be adopted.

FIRE MANAGEMENT	
OBJECTIVES	Minimise the risk of impact of fires associated with proposed activities. Ensure that fire control practices are implemented on site to minimise the risk of fire from site operations and wildfires. Ensure that Prodigy Gold complies fully with its legal obligations in relation to fire safety
TARGETS	No wildfires caused by exploration activities, whether deliberate or accidental. No Improper practices leading to unsuitable fire regimes. No human injuries or loss of equipment/facilities from wildfires
ACTIONS	The following guidelines are to be followed by all field personnel: • Open fires must be dug into the ground and/or surrounded by a low earth or stell container or rock wall to prevent spreading of hot embers and burning wood; • Open fires must be sited on cleared ground which is barren of vegetation over a radius of at least five metres from the fireplace; • Fires should only be used as needed for cooking; • Fires are not to be lit under windy conditions; • A shovel and/or ready supply of water must be close at hand; and • Only dead wood should be collected for fuel and firewood should be checked for inhabitants prior to use, e.g. lizards within hollow logs. To minimise risk of vehicle fire, drill rigs and light vehicles must carry fire extinguishers and/or 'on-board' fire suppressant systems. If a wildfire is encountered personnel should avoid the area and evacuate any downwind positions. For safety reasons, Prodigy Gold personnel are not permitted to try to fight such fires as they can be highly unpredictable. Should a fire threaten an exploration project area or camp site and evacuation is not an option, and it appears probable/highly likely that the fire will approach the area, back-burning to reduce the amount of vegetation (fuel) in the immediate vicinity of the site is permitted under the following circumstances: • Move portable plant and equipment to a safe location; • Preferably select small patches of vegetation to burn individually, one at a time. After each patch is burnt, extinguish remaining embers to avoid ember attack on nearby surrounds should the wind pick-up unexpectedly;

	• Fires are not to be lit under windy conditions. Back-burning is best done early in the morning or in the evening when the wind dies down; • Always burn up-wind, i.e. alight vegetation only where a fire break exists in the down-wind direction. The intention is to burn the vegetation (and thereby eliminate the fuel) in the zone between the site and the wildfire; • A shovel and/or ready supply of water must be close at hand for extinguishing embers; • Ensure a line of retreat away from the fire to safe ground (i.e. where no fuel exists); • Never attempt to back-burn alone - only do so with another team member present; and • If in any doubt, and safe to do so, do not attempt back-burning - EVACUATE THE AREA.
MONITORING	Regular inspections of firefighting equipment to ensure that it is serviceable. Regular checks of undercarriage of light vehicles and cleaning, to ensure build-up of grass is limited, thus minimising the risk of vehicle fires and trailing spot fires. Records in Environmental Observations and Incident Register. Reporting of any fires in close proximity to exploration activities or camps. Use of third-party websites to monitor movement of fires where possible. This is now a great source of information available to people on site with internet connections.
REVIEW & REPORTING	Reporting of any incidents internally and to DITT in accordance with Section 29 of the *Mining Management Act.* Review of inspections/checks to be provided in annual MMP reporting.

2.4.5. Weed Management

As part of ongoing exploration activities, equipment and freight movements will occur between project areas. If not managed properly the introduction and spread of weeds across the project areas can threaten natural ecosystems by out competing native species, potentially poisoning native fauna, changing water quality and changing fire regimes.

WEED MANAGEMENT	
OBJECTIVES	Prodigy Gold to prevent spread of established weeds within project areas and to prevent introduction of additional weed species to the project area. To manage any weed populations adjacent to major camps and to minimise disturbance to areas of declared weeds.
TARGETS	No increase in the distribution of existing weed species. No introduction of new weed species.

ACTIONS	**Staff education** • Educate staff during inductions of the potential to introduce new weeds. • Make weed identification information and control handbooks available to all staff and encourage reporting of weed sightings. **Weed Hygiene Procedure:** • Equipment/Vehicles are to be washed or cleaned down prior to entering and moving between sites and if moving from an area of known weed infestation to a weed free area. • Equipment entering site are inspected and a Weed and Introduces Species Hygiene sheet is completed and filed. • Equipment/Vehicles that are identified as requiring cleanliness will be cleaned in the designated wash or clean down area and re-inspected. • If equipment moves from an area of known weed infestation to another area it is required to be inspected and undergo thorough cleaning if required. If insufficient water available for washing equipment mud and vegetation should be removed by hand using brushes sticks and/or air hoses. • Check clothing, hats, socks, cuffs and shoes for seeds and burrs after working in a weed infested area. If required remove seeds and burrs. **Avoidance:** • Where possible avoid areas with heavy weed infestations. This will limit the spread of weeds. **Minimise Site Disturbance:** • Soil disturbance must be minimised by only clearing the area required and progressively clearing footprints ahead of activities. By minimising disturbance, the opportunity for weed establishment is reduced. **Controls** If weeds are identified at an area that is the result of Prodigy Gold's activities the following steps will be completed. • Define and map, planning weed control, • Chemical Control, • Mechanical Control
MONITORING	• Areas of weed infestation that are undergoing weed management require monitoring to ensure no re-growth. Monitoring frequency and duration should reflect the potential seed viability. • Areas to be disturbed in the vicinity of the weed occurrence need to be monitored for potential weed germination. • Designated wash down areas must be monitored after rain events for the germination of any seeds. If weeds germinate refer to the Control section above.
REVIEW & REPORTING	• Any significant infestations of Class A weeds are to be reported to Department of Environment, Parks and Water Security. • Review of data and summary of weed management activities in annual Mining Management Plan reporting.

2.4.6. Archaeology and Heritage Management

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.

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
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 G NL 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 will record the location of any discovered area of Aboriginal significance and inform the CLC • 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 Tourism and Culture. • locations of newly discovered historic / Aboriginal sites are to be recorded by the Project Geologist and communicated to the CLC.
MONITORING	Known sacred sites, Aboriginal sites and archaeological sites will be monitored during exploration activity to ensure none are being disturbed 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 and Department of Tourism and Culture 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 Tourism and Culture as appropriate.

3. EMS CONTINUAL IMPROVEMENT

Prodigy Gold commits to ensuring continual improvement of the EMS through the constant review of the EMS and supporting management plans. This will include an annual review of the EMS.

This EMS will also be available through the company website, where the public will have the opportunity to review the EMS in full. A pathway for comments will be made available through the company Admin email address where comments can be delivered and then considered by the management.

Reporting of Prodigy Gold's environmental and social governance (ESG) performance will also be undertaken annually with the results reported on the company website and through a release with the annual report. As this information is publically available it will allow our Stakeholders to comment on this performance and ensure that Prodigy Gold is being as transparent as possible in terms of this performance.

APPENDIX 1: ASPECTS AND IMPACTS REGISTER

Aspects and Impacts Register - Prodigy Gold Exploration Activities

Date Completed	12/01/2024						Site / Asset/ Depot	Tanami Region				Completed by	Mark Edwards			
Note - This aspect and impact assessment should be used as a guide only and needs to made specific to the task, site location where it applies																
	Potential Site Impact							Inherent Risk						Residual Risk		
Operation / Aspect	Release to water	Emissions to air	Contamination of Land	Damage to Natural Resources	Community Issues	Enforcement Matters	Impact Summary	Consequence Score (C)	Likelihood Score 1-5 (L)	Potential Risk Category (CxL) without controls in place.	What are the required management plans and processes for each impact *Incl. details of actions required to be supported by the relevant management plan.*	Do we have control over the process for the project? *If no; please list mitigating actions to be undertaken*	Will additional monitoring/reporting be required. *If yes; please add in additional reporting and monitoring requirements*	Consequence Score (C)	Likelihood Score 1-5 (L)	Residual Risk Category (C X L) with controls in place.
Flora - Clearing of vegetation during construction	C3	D4	C2	C1	C2	C3	Loss of vegetation	C	1	High	Use of Ground disturbance Management Plan, Clearly define footprint for clearance. Assessment of performance against protocols and procedures. Progressive rehabilitation.	Yes	No	D	1	High
Flora - Clearing of vegetation during construction	C3	D4	C2	C1	C2	C3	Introduction of weeds	C	1	High	Follow weed management plan including: Ensure vehicles and equipment arrive clean Vehicle washdown/inspection between infested and clean areas, Targeted weed control measures. Monitoring areas of high potential for weed invasions. Weed map and management plan. Control infestations of soil stockpiles	Yes	No	D	2	Moderate
Flora - Clearing of vegetation during construction	B3	C4	B2	C1	C1	C3	Reduced conditions favourable for plant growth (e.g., dust, compaction, salinity, contamination)	B	2	High	Progressive clearing of areas Dust control measures Progressive rehabilitation Spill reporting and response.	Yes	No	D	4	Low
Flora - Clearing of vegetation during construction	B3	B3	B2	B2	C3	C3	Permanent ecosystem damage	B	2	High	Understand final land use requirements Closure and rehabilitation plan with agreed criteria Progressive rehabilitation EMMP and monitoring	Yes	No	D	4	Low
Flora - Clearing of vegetation during construction	D5	D5	C1	C1	C3	C3	Persistence of weed species	C	1	High	Baseline survey Regional context for weed management Targeted control measures Weed Management Plan	Yes	Yes - Baseline surveys may be required	C	2	High
Flora - Clearing of vegetation during construction	C3	C3	C2	C2	D4	C3	Reduced conditions favourable for plant growth (e.g., dust)	C	2	High	Baseline survey Regional context for weed management Targeted control measures Weed Management Plan	Yes	Yes - Baseline surveys may be required	C	3	Moderate
Fauna - Habitat Loss	D4	D4	C4	C3	C4	C3	Habitat loss and fragmentation	C	3	Moderate	Minimise clearance Progressive rehabilitation	Yes	No	D	4	Low
Fauna Interaction	D4	D4	C4	A1	B3	C3	Vehicle accident due to fauna strike	A	1	Extreme	Speed limits with driver education including reporting of interactions with wildlife Vehicle design and safety equipment	Yes	No	A	3	High
Groundwater	B4	E5	C3	C3	C3	C3	Groundwater contamination	B	4	Moderate	Recording and reporting drilling interactions Education of drilling contractors of importance of ground water Procedures for managing water in sumps at rig (including construction of drill pads) Recognition of chemicals used by drilling contractors to not be harmful to groundwater	Yes	No	C	4	Moderate
Groundwater	B4	E5	C4	B4	C4	C3	Intersection/modification of aquifers	B	4	Moderate	capping wet holes when complete Backfill holes with cutting if capping not sufficient	Yes	No	C	4	Moderate
Groundwater	B3	E5	C4	B3	C4	C3	Release of contaminants to surface water (i.e., surface expression of groundwater)	B	3	High	capping wet holes when complete Backfill holes with cutting if capping not sufficient	Yes	No	C	4	Moderate
Surface Water - Contaminants in surface runoff	C3	E5	C4	C3	C4	C3	Adverse effects on downstream ecosystems due to fugitive sediment.	C	3	Moderate	Appropriate drainage construction Spill response Separation of clean and dirty water	Yes	No	D	4	Low
Surface Water - Contaminants in surface runoff	C3	E5	C4	C3	C4	C3	Eroded sediment from disturbed areas	C	3	Moderate	Clearance procedures Progressive rehabilitation of drill pads to limit erosion Fire control to limit impact on vegetation where possible	Yes	No	D	4	Low
Surface Water - Extreme rainfall on site	B2	E5	C4	B2	C4	C3	Unplanned release of poor quality water and stoppage of operations due to flooding.	B	2	High	Clearance procedures Progressive rehabilitation of drill pads to limit erosion Fire control to limit impact on vegetation where possible	Yes	No	B	4	Moderate
Archaeology and Cultural Heritage - Disturbance to Indigenous cultural exclusion zones	C4	E4	E4	C4	A3	C3	Disruption to sacred site	A	3	Extreme	Use of AAPA Certificates and CLC SSCC clearance processes Clearance permits to be used at all times Holes designed using the known exclusion zones Use of layers in field equipment to map locations of sites and exclusion zones	Yes	No	A	4	High
Archaeology and Cultural Heritage - Disturbance to Indigenous cultural exclusion zones	C4	E4	E4	C4	B3	C3	Disruption to indigenous sites of significance	B	3	High	Use of AAPA Certificates and CLC SSCC clearance processes Clearance permits to be used at all times Holes designed using the known exclusion zones Use of layers in field equipment to map locations of sites and exclusion zones	Yes	No	B	4	Moderate
Archaeology and Cultural Heritage - Disturbance to Indigenous cultural exclusion zones	C4	E4	E4	C4	B3	C3	Disruption to non-indigenous or archaeological sites of significance	B	3	High	Use of registered heritage sites. Recognised in GIS system used in the field	Yes	No	B	4	Moderate
Land & Resource Use - Modification of existing beneficial uses	C4	E4	E4	C4	C3	C3	Constraint on TO use of land for traditional purposes	C	3	Moderate	Consultation with TO's Education of community re restrictions Minimise surface footprint	Yes	No	D	3	Moderate
Land & Resource Use - Modification of existing beneficial uses	B4	C4	B4	B4	A5	C3	Accident or injury from crossing project areas (e.g., roads)	A	5	Moderate	Consultation with land users (Pastoralises and TO's) Education staff on vehicle interaction risks Design of access tracks to avoid common use areas Minimise surface footprint	Yes	No	A	5	Moderate
Air Quality	E4	C3	C4	C3	C3	C4	Reduced air quality due to fire (project-related ignition)	C	3	Moderate	Fire buffers Fire Management Plan Emergency response	Yes	No	D	4	Low
Noise & Vibration	E4	C3	E4	C3	B1	C3	Increased noise and vibration with reduced human health.	B	1	Extreme	Works mostly in very remote locations so likelihood significantly reduced Limit drilling in close proximity to camps where possible PPE for employees Monitoring by complaint	Yes	No	D	2	Moderate
Visual Amenity	E4	E4	E4	C4	C4	C4	Close proximity to Public Roads	C	4	Moderate	Limit works close to public roads and use existing flora to limit visibility Clearance procedures and limit extent of clearing	Yes	No	D	3	Moderate
Infrastructure & Transport - Increased road use for project-related vehicles	C3	C3	D3	C3	B3	C3	Changes in local traffic volumes and resulting safety and amenity issues.	B	3	High	Remote locations reduces likelihood Traffic Management Plan if required Consultation with Local community/road users if required	Yes	No	D	2	Moderate
Infrastructure & Transport - Camps impacting local environment	E4	E4	E4	C3	C3	C3	introduction of pests	C	3	Moderate	Biodiversity and weed management plans and procedures Fence camps to reduce interaction with fauna Waste management plan	Yes	No	E	5	Very Low
Rehabilitation Success - site rehabilitation fails	C3	C3	C3	B2	B2	C3	Inability to rehabilitate site to stakeholder expectations	B	2	High	Review rehabilitation success criteria in consultation with stakeholders	Yes	No	B	4	Moderate
Waste Management - General waste - workshop materials	C3	C3	C3	C3	C4	C3	Contamination of groundwater	C	3	Moderate	Removal of certain wastes from site. Containment and separation of waste into appropriate containers for disposal or recycling. Correct use of burn pits to reduce waste on sites	Yes	No	E	5	Very Low