

The Manager
Market Announcements Office
ASX Limited

11 April 2025

Compulsory acquisition of shares in Energy Resources of Australia Ltd

On 21 November 2024, North Limited (ACN 005 233 689) (**North Limited**) and Peko-Wallsend Pty Ltd (ACN 000 245 054) were issued shares in Energy Resources of Australia Ltd (ACN 008 550 865) (**ERA**) in connection with ERA's pro-rata renounceable entitlement offer of 29 August 2024. As a result, they increased their interest in ERA and now hold more than 90% of the voting power in ERA and a beneficial interest in at least 90% by value of all securities in ERA.

North Limited and Peko-Wallsend Pty Ltd are both wholly owned subsidiaries of Rio Tinto Limited (ACN 004 458 404), together the **Rio Tinto Parties**. North Limited is also the sole shareholder in Peko-Wallsend Pty Ltd.

North Limited has commenced the process for compulsorily acquiring the outstanding ordinary shares (**Ordinary Shares**) in ERA by lodging the relevant compulsory acquisition notices with the Australian Securities and Investments Commission (**ASIC**).

In accordance with section 664C(2)(d) of the *Corporations Act 2001* (Cth) (**Corporations Act**), we attach the following documents:

- a letter to the shareholders of ERA;
- ASIC Form 6024;
- an objection form; and
- a copy of the Independent Expert's Report prepared by Lonergan Edwards & Associates Limited in accordance with Part 6A.4 of the Corporations Act.

The enclosed documents were lodged with ASIC on 11 April 2025 and lodged with ERA on the same day. They will be despatched to ERA shareholders who hold Ordinary Shares in accordance with section 664C(2)(b) of the Corporations Act.

Yours sincerely,



Lavangie Weerapana
Company Secretary
North Limited

11 April 2025

Dear Shareholder,

RE: Compulsory acquisition of shares in Energy Resources of Australia Ltd

On 21 November 2024, North Limited (ACN 005 233 689) (**North Limited**) and Peko-Wallsend Pty Ltd (ACN 000 245 054) increased their interest in Energy Resources of Australia Ltd (ACN 008 550 865) (**ERA**) to more than 90%. They now hold more than 90% of the voting power in ERA and a beneficial interest in at least 90% by value of all securities in ERA.

North Limited and Peko-Wallsend Pty Ltd are both wholly owned subsidiaries of Rio Tinto Limited (ACN 004 458 404), together the **Rio Tinto Parties**. North Limited is also the sole shareholder in Peko-Wallsend Pty Ltd.

You have received this letter and the enclosed documents as you hold ordinary shares in ERA.

Compulsory Acquisition

North Limited is exercising its right to commence the process of compulsorily acquiring the remaining ordinary shares in ERA, which it and its related bodies corporate do not otherwise own in accordance with Part 6A.2 of the *Corporations Act 2001* (Cth) (**Corporations Act**). It has commenced this process with the Australian Securities and Investments Commission (**ASIC**), consistent with the intention flagged in connection with ERA's pro-rata renounceable entitlement offer.

North Limited proposes to compulsorily acquire the remaining ordinary shares in ERA for \$0.002 per share. This is the same price at which ERA offered all eligible shareholders the right to participate in the pro-rata renounceable entitlement offer which launched in 2024.

Additionally, as required by the Corporations Act, the Rio Tinto Parties have obtained a report from an independent expert nominated by ASIC. The independent expert's report is attached to this letter, and concludes that the fair value for each ordinary share is in the range of negative 0.0513 cents to negative 0.0235 cents with a midpoint of negative 0.0374 cents. You should carefully read the independent expert's report (including the independent specialist report annexed to that report), which discusses the valuation methods and approach taken to value your shares.

Attachments

North Limited attaches the following documents to this letter:

- ASIC Form 6024 (**Notice**);
- an objection form; and
- a copy of the independent expert's report prepared by Lonergan Edwards & Associates Limited in accordance with Part 6A.4 of the Corporations Act (which annexes the independent specialist report).

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The enclosed documents were lodged with ASIC on 11 April 2025. They provide formal notice of North Limited's intention to compulsorily acquire your ordinary shares, as well as certain rights available to you under the Corporations Act in response to the Notice.

Next Steps

The independent expert report (including the independent specialist report annexed to that report) is an important document and you should read it carefully and in its entirety as part of your assessment of what to do next. If you are in any doubt about how to deal with this document or have any questions, you should contact your broker, financial adviser, legal adviser or other professional adviser immediately.

If you wish to object to the acquisition, you may complete and return the enclosed Objection Form to the address specified on the form so that it is received by 19 May 2025, otherwise, no action is required. If North receives objection notices from shareholders holding 10% or more of ERA shares covered by this compulsory acquisition notice before the end of the objection period, North Limited intends to apply for Court approval for the acquisition of all remaining ERA securities in accordance with section 664F of the Corporations Act.

Yours sincerely,



Lavangie Weerapana
Company Secretary
North Limited

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Notice of compulsory acquisition

Notice

Description of class of securities

To each holder of:

Class of securities ('the class')

Ordinary Shares

Name of target company

in

Name ('the Company')

Energy Resources of Australia Limited

ACN/ARBN/ARSN

ACN 008 550 865

Insert name of 90% Holder

1. North Limited (ACN 005 233 689)

('the 90% holder')

Tick one box

holds either alone or with a related body corporate, full beneficial interests in at least 90% of the securities (by number) in the class.

has voting power of at least 90% in the Company and holds, either alone or with a related body corporate, full beneficial interests in at least 90% by value of all securities of the Company that are either shares or convertible into shares.

Description of class of securities

2. Under subsection 664A(3) of the Corporations Act 2001 ('the Act') the 90% Holder may compulsorily acquire all the

Ordinary Shares

if less than 10% by value of holders in that class have objected to the acquisition by the end of the objection period set out in this notice or the Court approves the acquisition under section 664F of the Act.

Description of class of securities

3. The 90% Holder hereby gives notice that it proposes to compulsorily acquire

each Ordinary Share

that you hold for the cash amount of

Cash amount for the securities. This may be expressed as an amount per security.

\$ 0.002 or 0.2 cents

A notice sent by post to you is taken to be given to you 3 days after it is posted.

Period during which holders may return the objection form. The period must be at least one month.

4. Under section 664E of the Act, you, (or anyone who acquires the securities during the objection period) have the right to object to the acquisition of your securities by completing and returning the objection form that accompanies this notice within

one month

of receipt of this notice. The objection cannot be withdrawn.

5. You have the right to obtain the names and addresses of everyone else who holds securities in the class from the Company register.

6. Under section 664F of the Act, if 10% of holders of securities covered by this compulsory acquisition notice have objected to the acquisition before the end of the objection period, the 90% Holder may, within one month after the end of the objection period, apply to the Court for approval of the acquisition of the securities covered by this notice.

Details of the consideration given for the securities

7. During the last 12 months the 90% Holder or an associate has purchased securities of the same class for

The 90% Holder, and its related body corporate Peko-Wallsend Pty Ltd purchased ordinary ERA shares for \$0.002 per new ordinary share pursuant to an entitlement offer (issued on 21 November 2024).

Continued... Notice

Include any information that is known to the 90% Holder or any related bodies corporate that is material to deciding whether to object to the acquisition and has not been disclosed in an expert's report under section 667A of the Act.

8. The 90% Holder and its related bodies corporate are not aware of any information material to deciding whether to object to the acquisition that has not otherwise been disclosed in the independent expert's report accompanying this notice (including the independent specialist report annexed to that report).

Signature

Name of person signing

Lavangie Weerapana

Capacity

Company Secretary

Signature



Date signed

1 1 / 0 4 / 2 5
[D D] [M M] [Y Y]

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**CORPORATIONS ACT
PART 6A.2
OBJECTION FORM**

North Limited
L18, 152-158 St Georges Terrace, Perth
(North Limited)

Objection to Compulsory Acquisition

Pursuant to section 664E(1) of the Corporations Act 2001 (Cth) (**Corporations Act**), I / we of (insert name _____), with Securityholder Reference Number (**SRN**) or Holder Identification Number (**HIN**) (in each case, if known)

_____ being the holder of _____ ordinary shares in Energy Resources of Australia Ltd (**ERA**) covered by the notice of compulsory acquisition (**Notice**) hereby notify North Limited that I / we object to the compulsory acquisition of the ordinary shares in ERA held by me/us and acknowledge that this objection:

- (a) relates to all securities of the above class that are covered by the Notice and are held by me / us as at the end of the objection period; and
- (b) cannot be withdrawn.

If this objection form is completed, signed and returned, I / we acknowledge and consent to a copy of this form being lodged with Australian Securities & Investment Commission (**ASIC**) and my / our name and shareholding in ERA being included in a list to be lodged with ASIC and ERA and for disclosure of this information to be made in a public announcement provided to the Australian Securities Exchange. This form can be returned by:

- (a) mailing or delivering it to the following address:
Computershare Investor Services Pty Limited
GPO Box 52
Melbourne VIC 3001
Australia
- (b) alternatively, scanning and emailing to ERACAO objections@computershare.com.au.

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Sincerely,

Director

Director/Secretary

Print Name

Print Name

Date: _____

OR

Signature of shareholder

Signature of second shareholder (if applicable)

Print Name

Print Name

Signature of third shareholder (if applicable)

Print Name

Date: _____

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**CORPORATIONS ACT
PART 6A.2
OBJECTION FORM**

INSTRUCTIONS

- 1 Please insert your name and number of shares where indicated on this Objection Form.
- 2 Please sign and date this Objection Form where indicated. This Objection Form will **not** be valid unless it is signed correctly in accordance with the specified signing instructions set out below.
 - (a) **Individual:** Where the shareholding is in one name, the shareholder must sign.
 - (b) **Joint Holding:** Where the shareholding is in more than one name, all of the shareholders must sign.
 - (c) **Power of Attorney:** Where signing as Power of Attorney, you must attach an original certified copy of the Power of Attorney to this form.
 - (d) **Companies:** Where the holding is in the name of a company, this form must be signed in accordance with the Corporations Act, either as:
 - (i) a sole director and company secretary; OR
 - (ii) two directors; OR
 - (iii) a director and a company secretary.
- 3 If you wish to object to the compulsory acquisition, this Objection Form must be returned to the address specified above by no later than one month after the Notice was given. Under the *Corporations Act 2001* (Cth), the Notice is deemed given 3 days after it is posted.

LONERGAN EDWARDS & ASSOCIATES LIMITED



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AFS Licence No. 246532
Level 7, 64 Castlereagh Street
Sydney NSW 2000 Australia

Telephone: +61 2 8235 7500
www.lonerganedwards.com.au

Independent expert's report in connection with the proposed compulsory acquisition of Energy Resources of Australia Ltd by North Limited

Authorised Representatives:

Wayne Lonergan • Julie Planinic* • Nathan Toscan • Hung Chu • Grant Kepler* • Martin Hall • Jorge Resende • Brett Aalders • Craig Edwards

* Members of Chartered Accountants Australia and New Zealand and holders of Certificate of Public Practice.

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The Directors
North Limited
Level 18, Central Park
152 to 158 St Georges Terrace
Perth WA 6000

2 April 2025

Subject: Proposed compulsory acquisition of Energy Resources of Australia Ltd

Dear Directors

Introduction

- 1 On 29 August 2024, Energy Resources of Australia Limited (ERA or the Company) announced a 19.87-for-1 non-underwritten pro-rata renounceable entitlement offer to raise up to approximately \$880 million at an offer price of \$0.002 per share (the 2024 Entitlement Offer). The net proceeds of the 2024 Entitlement Offer were intended to provide ERA with sufficient cash to fund planned Ranger Project Area rehabilitation expenditure up until approximately 3Q27.
- 2 Rio Tinto Limited (Rio Tinto), through its 100% owned subsidiaries North Limited and Peko-Wallsend Pty Ltd (Peko-Wallsend), committed to subscribe for their respective pro-rata entitlements (in aggregate, 379.9 billion shares) at a cost of approximately \$760 million. Prior to the 2024 Entitlement Offer, Rio Tinto held some 86.3% of the shares in ERA. Rio Tinto stated (on 29 August 2024) that if its interest in ERA increased to 90% or more as a result of the 2024 Entitlement Offer, then it intended to proceed with the compulsory acquisition of all remaining ERA shares at an offer price of \$0.002 per share¹.
- 3 On 18 November 2024, ERA announced that shareholders applied for some 383.1 billion shares (out of a maximum of 440.1 billion), raising some \$766.1 million (before costs). A further 181.4 million shares were issued to certain shareholders (not including Rio Tinto) under a shortfall facility², resulting in the issue of a total of 383.2 billion shares for total proceeds of \$766.5 million (before costs).

¹ Source: ERA announcement, *Capital Raising Presentation (for Entitlement Offer)*, 29 August 2024.

² 57.0 billion shares were offered for sale under the shortfall bookbuild, but no bids were received for the shortfall shares at, or above, the offer price.

Authorised Representatives:

Wayne Lonergan • Julie Planinic* • Nathan Toscan • Hung Chu • Grant Kepler* • Martin Hall • Jorge Resende • Brett Aalders • Craig Edwards

* Members of Chartered Accountants Australia and New Zealand and holders of Certificate of Public Practice.
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4 ERA shareholders, other than Rio Tinto, applied for only 3.3 billion shares out of a maximum of 60.2 billion (an application rate of only 5.5%³). As a result, Rio Tinto increased its interest in ERA to approximately 98.4%.

5 As Rio Tinto has acquired a greater than 90% interest in ERA's issued ordinary shares, it has the right but not the obligation, under Chapter 6A of the *Corporations Act 2001* (Cth) (Corporations Act), to compulsorily acquire the remaining ordinary shares in ERA that it does not already own within six months of it increasing its beneficial interest in ERA to at least 90% of ERA's issued ordinary shares.

6 On 19 November 2024, Rio Tinto confirmed its previously stated intentions, that it intended to proceed with the compulsory acquisition of all remaining ERA shares at an offer price of \$0.002 per ERA share (the Proposed Consideration) (the Compulsory Acquisition).

ERA

7 ERA is an Australian Securities Exchange (ASX) listed uranium miner with operations in the Northern Territory (NT). At the date of this report, ERA's principal operations were the rehabilitation of the former Ranger uranium mine, which ceased mining operations in 2012 and ceased processing operations in January 2021. ERA is the holder of mining lease Northern 1 (MLN1 / Jabiluka) on which the Jabiluka uranium deposit is located. MLN1 was due for renewal in August 2024 but was not renewed by the NT Government on advice from the relevant Commonwealth Government Minister. ERA is currently challenging that decision in the Federal Court of Australia.

Purpose of report

8 Pursuant to s664(C)(2)(b) and s667A of the Corporations Act, the notice of compulsory acquisition (Compulsory Acquisition Notice) issued by North Limited, a wholly owned subsidiary of Rio Tinto, for the purposes of the Compulsory Acquisition must be accompanied by an independent expert's report (IER) that states whether the terms in the notice give a "fair value" for the securities concerned, together with the reasons for that opinion.

9 Consequently, the Directors of North Limited have requested that Lonergan Edwards & Associates Limited (LEA) prepare an IER which sets out our opinion on whether the terms in its notice give a "fair value" for the ERA shares concerned (i.e. whether the Proposed Consideration is "fair").

10 LEA is independent of Rio Tinto (including North Limited and Peko-Wallsend) and ERA and has no other involvement or interest in the Compulsory Acquisition.

Summary of opinion

11 In LEA's opinion, the terms of the Compulsory Acquisition give a "fair value" for the ERA shares that are the subject of the Compulsory Acquisition. We have formed this opinion for the reasons set out below.

3 Total maximum number of shares to be issued under the offer of 440.1 billion, less the 379.9 billion issued to Rio Tinto (which took up its full entitlement) equals 60.2 billion shares available for other shareholders, of which 3.3 billion were taken up (total 383.2 billion shares issued less the 379.9 billion issued to Rio Tinto).

Assessment of “fairness”

- 12 ERA conducts no net cash generating activities⁴, with its current operations primarily focused on the rehabilitation of the Ranger Project Area⁵. However, ERA also has other assets, including mineral interest assets (such as MLN1) and cash. Given this, LEA considers the sum of the parts approach to be the most appropriate method for valuing ERA as a whole. This approach allows the value of ERA’s individual assets and liabilities to be separately assessed using the most suitable methodology for each, with the resulting values then aggregated to determine ERA’s overall value. In this regard, we note that:
- (a) the future liability for rehabilitating the Ranger Project Area is a finite obligation best assessed using a discounted cash flow (DCF) analysis. LEA has engaged an independent technical specialist, SRK Consulting Australasia Pty Ltd (SRK), to evaluate the reasonableness of the cost estimates prepared by ERA management
 - (b) ERA’s mineral interest assets (including MLN1, the Ranger 3 Deeps project⁶, and the Cooper Creek JV⁷) are undeveloped mineral interest assets that do not currently generate revenue or cash flow. Given the absence of reliable long-term cash flow projections to support a DCF analysis, LEA has commissioned SRK to independently assess their value
 - (c) ERA’s other asset and liability items predominantly comprise cash and cash equivalents, or other items that collectively are relatively negligible in value.
- 13 LEA notes that given the significant uncertainty as to the value of the expected future Ranger Project Area rehabilitation costs and the value of MLN1 (that is, variability of plausible value outcomes), this will result (prima facie) in a range that is broader than convention.
- 14 A key aspect of our valuation is our view that it is reasonable to expect an acquirer of 100% of the equity of ERA would need to take responsibility for the rehabilitation of the Ranger Project Area and cover any shortfall that arises between the rehabilitation costs and the value or cash flows that may be generated by ERA’s assets (including MLN1). That is, an acquirer would need to commit to fully fund the Ranger Project Area rehabilitation costs (either by injecting capital or otherwise guaranteeing ERA’s obligation) before the actual outcomes for MLN1 are resolved (and hence before its final value is known). In effect, this means that an acquirer could not rely upon ERA’s limited liability (corporate) structure to limit its downside exposure to \$nil while maintaining full upside potential (being the option-like position enjoyed by ERA’s minority shareholders⁸). We have adopted this approach because:
- (a) given the extensive regulatory and approvals regime in place for uranium mining in Australia, in LEA’s view, it is reasonable to expect that the relevant government authorities and ministers would have significant regard to whether a potential acquirer of 100% of ERA has the financial capacity to fully fund the rehabilitation of the Ranger

⁴ Other than deriving interest income and small amounts of rent income.

⁵ The 79 square kilometre (sqkm) Ranger Project Area hosts the former Ranger mine, and is located 8 kilometres (km) east of Jabiru and 260 km east of Darwin in the NT (Ranger Project Area).

⁶ Refer to paragraph 65.

⁷ Refer to paragraph 65.

⁸ The issue of optionality is explored in greater detail from paragraph 227, and may explain why the historical trading prices for minority interest parcels of ERA shares are higher than the value estimated by a fundamentals based controlling interest analysis (which does not limit the downside exposure to \$nil).

Project Area and has committed to do so before making a determination to renew / extend MLN1 (being the primary driver of the upside potential of ERA), or consenting to a change in control of ERA (as applicable)

- (b) any firm of a type that would be interested in, and capable of, acquiring 100% of ERA would, in LEA's view, likely suffer significant reputational damage⁹ – at least in Australia and probably globally – in the event that it failed to contribute the necessary funds to complete the Ranger Project Area rehabilitation.

15 As a result of our view, LEA has allowed for the full negative impact of scenarios that produce negative net equity outcomes, rather than limiting these outcomes to \$nil.

16 We have assessed the value of ERA's shares on a 100% controlling interest basis as follows:

ERA shares – valuation summary ⁽¹⁾			
	Para	Low \$m	High \$m
Cash and government security receivable	198, 199	1,299.7	1,299.7
MLN1 ⁽²⁾	240	332.2	443.0
Other mineral assets			
Cooper Creek JV	241	0.4	2.0
Ranger 3 Deeps	241	-	-
Ranger Project Area rehabilitation liabilities	257	(2,402.8)	(2,402.8)
Tax deduction on future rehabilitation costs	262	576.7	576.7
Existing carry forward tax losses	263	-	-
Other assets, net working capital balances and employee provisions	268	(13.9)	(13.9)
Equity value – controlling interest basis		(207.8)	(95.4)
Ordinary shares outstanding (million)	269	405,396.2	405,396.2
ERA value per share – controlling interest basis (cents)⁽³⁾⁽⁴⁾		<u>(0.0513)</u>	<u>(0.0235)</u>

Note:

1 Rounding differences may exist.

2 LEA notes that whilst we have adopted a range, SRK's single point estimate of the encumbered value lies at the lower end of the range in recognition of the various uncertainties which remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal), ERA's recent write downs of the project value in its financial accounts, the longstanding and intergenerational opposition to the development of Jabiluka by the Mirarr Traditional Owners and the downward trajectory implied by ERA's decision to no longer include MLN1 / Jabiluka in its reported mineral resources.

3 Whilst a purchaser of a minority interest is able to avoid a negative equity outcome (due to ERA being a limited liability company), in LEA's view, an acquirer of 100% of the equity in ERA will not be able to avoid such outcomes. Accordingly, LEA has not limited the negative equity outcomes to \$nil.

4 In the event that LEA's assumption regarding future tax deductions being available for the Ranger Project Area rehabilitation expenditure to a purchaser of 100% of the equity in ERA is not correct – such that tax deductions are not available to "the market", then the equity value would reduce further.

17 Pursuant to Australian Securities & Investments Commission (ASIC) Regulatory Guide 111 – *Content of expert reports* (RG 111) a control transaction is "fair" if the value of the

⁹ That may result in a material adverse impact on that firm's cost of capital and probability of receiving approvals for future projects.

consideration offered is equal to, or greater than, the value of the securities that are the subject of the offer. This comparison for ERA shares is shown below:

Comparison of Proposed Consideration with assessed value of ERA shares			
	Low cps⁽¹⁾	High cps⁽¹⁾	Mid-point⁽²⁾ cps⁽¹⁾
Value of Proposed Consideration	0.2000	0.2000	0.2000
Value of ERA shares on a controlling interest basis	(0.0513)	(0.0235)	(0.0374)
Extent to which the Proposed Consideration exceeds (or is less than) the value of ERA shares	0.2513	0.2235	0.2374

Note:

- 1 Cents per share (cps).
- 2 Noting SRK's single point estimate for the encumbered value of MLN1 lies at the lower end of the range, as referenced above.

- 18 As the Proposed Consideration exceeds our assessed valuation range for ERA shares on a 100% controlling interest basis, in our opinion, the Proposed Consideration is "fair" to ERA shareholders when assessed based on the guidelines set out in RG 111.

Other considerations

- 19 Whilst LEA considers its adopted valuation range to be reasonable in the circumstances, we nonetheless acknowledge that there is significant uncertainty as to the value of the expected future Ranger Project Area rehabilitation costs and the value of MLN1 (in particular). This uncertainty results in a broad range of plausible valuation outcomes. The following table presents a range of potential values for these two items and their impact on the assessed value of ERA shares:

Sensitivity of ERA share value (cps) to changes in MLN1 value and rehabilitation costs⁽¹⁾⁽²⁾										
			Value of MLN1 (A\$/lb and \$m)⁽³⁾							
			1.10	1.28	1.47	3.31	4.13	4.96	5.79	6.62
			332	388	443	1,000	1,250	1,500	1,750	2,000
Ranger Project rehabilitation cost (\$m)⁽⁴⁾	80%	(1,922)	0.039	0.053	0.066	0.204	0.265	0.327	0.389	0.450
	85%	(2,042)	0.016	0.030	0.044	0.181	0.243	0.305	0.366	0.428
	90%	(2,163)	(0.006)	0.008	0.021	0.159	0.220	0.282	0.344	0.405
	95%	(2,283)	(0.029)	(0.015)	(0.001)	0.136	0.198	0.260	0.321	0.383
	100%	(2,403)	(0.051)	(0.037)	(0.024)	0.114	0.175	0.237	0.299	0.360
	105%	(2,523)	(0.074)	(0.060)	(0.046)	0.091	0.153	0.214	0.276	0.338
	110%	(2,643)	(0.096)	(0.082)	(0.069)	0.069	0.130	0.192	0.254	0.315

Note:

- 1 Our assessed valuation range is broadly represented by the area enclosed by the dashed line.
- 2 All other assets and liabilities are based upon the mid-point of our assessed value range.
- 3 Value per Australian dollar per pound (A\$/lb) of resource based on ERA's previously (31 December 2023) reported uranium resource for MLN1 of 302.3 million pounds (Mlb).
- 4 A corresponding adjustment is also made to the value of the tax deduction on the rehabilitation costs.

- 20 For the Proposed Consideration to be assessed as "not fair", the low end of the assessed value range for ERA shares must exceed \$0.002 per share (i.e. the value of the Proposed

Consideration must lie below the lowest assessed value of ERA shares). The scenarios where this occurs are highlighted in light blue in the table and broadly speaking arise when:

- (a) the lower end of the valuation range for MLN1 exceeds approximately \$1,350 million (some A\$4.5/lb), while the Ranger Project Area rehabilitation costs remain unchanged; or
- (b) the lower end of the estimated rehabilitation costs for the Ranger Project Area decreases by over 50% of the current estimate, while the lower end of the valuation range for MLN1 remains unchanged; or
- (c) other combinations of higher values of MLN1 and lower rehabilitation costs occur.

21 In respect of this, we note that:

- (a) in the four years to 31 December 2024, the provision recognised by ERA, based on the estimated future costs of the Ranger Project Area rehabilitation, has increased by over 300% (from a provision of \$718 million at 31 December 2020 to \$2,423 million at 31 December 2024), with the bulk of that increase arising as a result of the findings of a 2021 independent review of the cost and schedule in relation to the calculation of the provision, and a 2022 feasibility study update (the results of which were received in October 2023). SRK has noted that the Ranger Project Area rehabilitation is inherently a complex project and it is likely that the current provision will need to be revised once further studies are complete or additional approvals granted. SRK has identified components of the project where costs may potentially increase, and also noted there is the potential for cost savings to arise from the Management Services Agreement between ERA and Rio Tinto dated April 2024 (MSA), under which ERA appointed Rio Tinto to manage the Ranger Project Area rehabilitation project¹⁰. Further, LEA notes that elements of the cost estimates are contingent on factors such as rainfall, evaporation rates and future unit costs for bulk materials movements – factors that are either not within or not fully within ERA’s control. Notwithstanding, in LEA’s view, the provision recognised by ERA represents the current best estimate of the present value of the future expected rehabilitation costs¹¹
- (b) values attributed to MLN1 in the region of \$1,350 million (A\$4.5/lb) exceed the value SRK attributed to MLN1 on an unencumbered basis, that is, *prior to* considering various relevant factors including:
 - (i) the 26 July 2024 decision of the NT Government, based on advice from the Commonwealth Government, not to renew MLN1 (Renewal Decision). ERA’s tenure to MLN1 currently rests on a stay order from the Federal Court pending a further order of the Court in the proceedings commenced by ERA to appeal the Renewal Decision on 6 August 2024
 - (ii) the Mirarr Traditional Owners remain strongly opposed to any future development and/or mining of MLN1

¹⁰ LEA notes that any such savings have not yet been formally identified and costed.

¹¹ LEA notes that the cost estimates that underpin the rehabilitation provision have been subject to review by multiple parties including ERA’s Board, ERA’s auditors, independent technical specialists and, for the purposes of this report, SRK.

- (iii) it remains to be determined whether the Commonwealth and/or NT Governments would authorise any future development or mining of MLN1 pending an application to do so
- (iv) it remains to be determined if all parties (including the Mirarr Traditional Owners, the Commonwealth and NT Governments and other stakeholders) would agree terms to enable a transaction to complete
- (v) any impact of ERA electing to no longer include MLN1 in reported mineral resources
- (c) SRK's single point estimate of the encumbered value of MLN1 lies at the lower end (not the mid-point or high end) of its range, i.e. at \$332 million
- (d) while SRK's analysis of asset and listed company acquisitions and peer listed company trading data identified mineral interest assets valued at multiples of resources in the region of A\$5/lb and higher, LEA notes the following observations made by SRK in relation to those examples:
- (i) Uranium Energy Corp's acquisition of the Roughrider deposit in Canada from a subsidiary of Rio Tinto plc in October 2022 (normalised resource transaction multiple of A\$5.53/lb) – although the Roughrider resource deposit is smaller than that previously reported at MLN1 (57 Mlb versus 302 Mlb), it exhibits significantly higher average grades than MLN1 (4.73% versus 0.55% U₃O₈)
- (ii) Denison Mines Corp (Denison) (listed company, A\$15.0/lb¹²) – Denison's flagship projects and other main mineral interest are significantly more advanced than MLN1 and although Denison's estimated mineral resources (167 Mlb) are smaller than that previously reported for MLN1 (302 Mlb), the average grade across Denison's resources (2.06% U₃O₈) significantly exceeds the average grade at MLN1 (0.55% U₃O₈)
- (iii) NexGen Energy Ltd (NexGen) (listed company, A\$17.7/lb¹³) – NexGen's flagship project is estimated at a broadly similar size to that previously reported for MLN1 (338 Mlb versus 302 Mlb) but the defined resource grades are significantly higher than those at MLN1 (1.88% versus 0.55% U₃O₈), with a significantly greater proportion of the overall resource being classified as Measured (210 Mlb versus 24 Mlb). NexGen's flagship project has also been studied to a significantly higher level than MLN1, has a defined Probable Reserve, and has received support and advocacy from local indigenous nations.

In light of the above, in LEA's view, value outcomes for MLN1 that imply resource multiples of over A\$5/lb are not reasonable even before considering the encumbrances, i.e. tenure and consent issues

- (e) due to the thinly traded nature of ERA shares, the likely existence of option like value (that benefits ERA's minority shareholders but not, in our view, a 100% acquirer) and ERA's very recent decision to no longer include MLN1 in its reported mineral resources, we do not consider ERA's market prices to be reliable indicator of ERA's equity value on a 100% controlling interest basis¹⁴. Consequently, any implied value of

¹² Including control premium.

¹³ Including control premium.

¹⁴ We note that a large proportion of the control premium conventionally paid in successfully completed change of control transactions in Australia is likely to already be reflected in ERA's traded prices.

MLN1 derived from these prices is also unreliable. That being said for completeness, we note (per our analysis from paragraphs 224(d) and 225(b) below) that:

- (i) in or around March 2024, the lower end of the range of implied values for MLN1 (based on market trading of ERA shares) reached a high of some \$2.5 billion (tax deduction available¹⁵). However, since then, the Renewal Decision was announced, the spot price of uranium has materially declined, as (generally) have the share prices of the broadly comparable listed companies and ERA no longer including MLN1 in its reported mineral resources
- (ii) a current implied value for MLN1 cannot be determined from current market prices, as ERA's traded price is influenced (or "disturbed") by the Compulsory Acquisition. In the absence of "undisturbed" market based evidence we have estimated the lower end of the current market implied value of MLN1 (before accounting for any impact that may be caused by ERA's decision to no longer include MLN1 in its reported mineral resources) to be between \$1.5 billion and \$1.6 billion^{16,17}

Notwithstanding, and as referenced above, in LEA's view, we do not consider ERA's market prices (upon which these analyses are based) to be reliable indicator of ERA's equity value on a 100% controlling interest basis.

22 LEA also notes that:

- (a) the Directors of ERA have advised that no superior alternative proposal (or enquiry) has emerged since Rio Tinto confirmed its intention to proceed with the Compulsory Acquisition on 19 November 2024¹⁸. While we acknowledge that Rio Tinto's (98%) interest in ERA acts as a strong deterrent, if the Proposed Consideration significantly undervalued the Company (i.e. MLN1 has very significant value in excess of the cost the Ranger Project Area rehabilitation, beyond that reflected in the Proposed Consideration), it would be reasonable to expect another party to emerge
- (b) very few ERA shareholders, outside of Rio Tinto, applied for additional shares in ERA's 2024 Entitlement Offer at \$0.002 per share (the application rate was only some 5.5%, refer paragraph 4). Had the offer price significantly undervalued the Company, then it would be reasonable to expect the acceptance rate to have been higher (noting though that Rio Tinto had announced its intention to proceed with the Compulsory Acquisition at the same price, thus potentially limiting the perceived returns available to investors).

¹⁵ Assuming that a tax deduction is available on the future Ranger Project Area rehabilitation costs.

¹⁶ Firstly, by reference to the implied values immediately prior to ERA's share price being "disturbed", which we have then adjusted for the dilutive impact of the 2024 Entitlement Offer, the decline in the spot price of uranium and ERA's estimated cash burn through to 28 February 2025. Secondly, by reference to the implied value attributed to MLN1 by the market when the spot price of uranium was last at the currently observed levels, which we have then adjusted for an estimate of the impact of the Renewal Decision.

¹⁷ These estimates should be viewed as illustrative and do not represent a definitive assessment of the implied value of MLN1 and there is no certainty that the market would have assigned, or would currently assign, these values to MLN1 in the absence of the Compulsory Acquisition.


¹⁸ Rio Tinto first stated its intention and offer price on 29 August 2024.

- 23 While some uncertainty exists regarding the value of the expected future Ranger Project Area rehabilitation costs and the value of MLN1 (in particular), in LEA's opinion, the combinations of values that would result in the Proposed Consideration being assessed as "not fair" are relatively unlikely. Furthermore, even in optimistic ("upside") scenarios where MLN1's value is high, the potential excess value (above the Proposed Consideration) is, in LEA's opinion, outweighed by the risk of the "downside" scenarios¹⁹. Accordingly, even when considering the range of plausible scenarios (rather than just the point estimates of the values of the assets and liabilities), LEA's overall opinion on the "fairness" of the Proposed Consideration remains unchanged.

General

- 24 This report contains general financial product advice only and has been prepared without taking into account the personal objectives, financial situations or needs of individual ERA shareholders. Accordingly, before acting in relation to the Compulsory Acquisition, ERA shareholders should have regard to their own objectives, financial situation and needs. ERA shareholders should also read the Compulsory Acquisition Notice that has been issued by North Limited in relation to the Compulsory Acquisition.
- 25 Furthermore, this report does not constitute advice or a recommendation (inferred or otherwise) as to whether ERA shareholders should accept or object to the Compulsory Acquisition. This is a matter for individual ERA shareholders based upon their own views as to value, their expectations about future economic and market conditions and their particular personal circumstances including their risk profile, liquidity preference, investment strategy, portfolio structure and tax position. If ERA shareholders are in doubt about the action they should take in relation to the Compulsory Acquisition or matters dealt with in this report, shareholders should seek independent professional advice.
- 26 For our full opinion on the Compulsory Acquisition and the reasoning behind our opinion, we recommend that ERA shareholders read the remainder of our report.

Yours faithfully



Grant Kepler
Authorised Representative



Nathan Toscan
Authorised Representative

¹⁹ Where the value of MLN1 does not sufficiently exceed the Ranger Project Area rehabilitation costs to match the Proposed Consideration. Noting that, for reasons previously discussed, we do not consider it reasonable to expect that a 100% purchaser of ERA could realise the value (if any) associated with MLN1 without committing to fully funding the Ranger Project Area rehabilitation costs.

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Appendices

- A** **Financial Services Guide**
- B** **Qualifications and declarations**
- C** **Valuation methodologies**
- D** **Glossary**

Annexures

- A** **Independent Specialist Report of SRK Consulting dated 31 March 2025**

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I Overview of a general compulsory acquisition

General compulsory acquisition, with no prior takeover offer needed

- 27 Part 6A.2 of Chapter 6 of the Corporations Act creates two separate kinds of statutory rights of compulsory acquisition, each of which are available whether or not the securityholder who proposes to acquire the securities has previously made a takeover bid.
- 28 The first of these rights (conferred by s664A(1) and (3)) entitles a 90% holder, which includes a person that holds, either alone or with a related body corporate, full beneficial interests in at least 90% of the securities (by number) in that class, to compulsorily acquire the remaining securities in that class for a cash sum.
- 29 The right can only be exercised within six months of the 90% holder attaining that status (s664AA) by lodging a compulsory acquisition notice with ASIC.
- 30 The compulsory acquisition notice must also be provided to everyone (other than a related body corporate of the 90% holder) who is a holder of securities in the class on the same day the notice is lodged with ASIC (s664C(2)). The compulsory acquisition notice provided to securityholders must be accompanied by an IER and an objection form (s664C(2)(b)).

Compulsory acquisition notice

- 31 The compulsory acquisition notice should, pursuant to s664C, be in a prescribed form that:
- (a) sets out the cash sum for which the 90% holder proposes to acquire the securities;
 - (b) specifies a period of at least one month during which the securityholders may return the objection forms;
 - (c) informs the securityholders about the compulsory acquisition procedures under Part 6A.2, including:
 - (i) their right to obtain the names and addresses of the other securityholders of securities in that class from the company register; and
 - (ii) their right to object to the acquisition by returning the objection form that accompanies the notice within the period specified in the notice; and
 - (iii) gives details of the consideration given for any securities in that class that the 90% holder or an associate has purchased within the last 12 months.
- 32 The compulsory acquisition notice must also disclose any other information that is known to the 90% holder (or any related bodies corporate), which is material to deciding whether to object to the acquisition and has not been disclosed in the IER (s664C(1)(e)).
- 33 The 90% holder cannot withdraw the notice, or issue another notice prior to the end of the objection period (s664C(6)).

Completion / rejection process

- 34 A person who holds securities that are the subject of compulsory acquisition may object to the acquisition by signing and returning the objection form within the (not less than one month) period specified in the compulsory acquisition notice (s664E).

- 35 The compulsory acquisition will proceed unless objections are received by persons that hold between them **at least 10% by value** of the securities the 90% holder is proposing to acquire (s664A(3)).
- 36 If sufficient objections are received, the 90% holder loses the right of compulsory acquisition unless (s664A3(b) and s664F):
- (a) within one month after the end of the objection period, the 90% holder applies to the Court for approval; and
 - (b) the Court's approval is subsequently given.
- 37 Pursuant to s664F, the Court must approve acquisition if the 90% holder establishes that the terms set out in the compulsory acquisition notice give a "fair value" for the securities concerned. For the avoidance of doubt, the 90% holder bears the onus of establishing that the acquisition is for "fair value". In the absence of this being established by the 90% holder, the Court will confirm that the acquisition will not take place (i.e. has failed).

II Scope of our report

Purpose

- 38 As Rio Tinto has acquired a greater than 90% interest in ERA's issued ordinary shares, it has the right but not the obligation, under Chapter 6A of the Corporations Act, to compulsorily acquire the remaining ordinary shares in ERA that it does not already own within six months of it increasing its beneficial interest in ERA to at least 90%.
- 39 On 19 November 2024, Rio Tinto confirmed its previously stated intentions, that it intended to proceed with the compulsory acquisition of all remaining ERA shares at an offer price of \$0.002 per ERA share (the Proposed Consideration) (the Compulsory Acquisition).
- 40 Pursuant to s664(C)(2)(b) and s667A of the Corporations Act, the Compulsory Acquisition Notice issued by North Limited, a wholly owned subsidiary of Rio Tinto, for the purposes of the Compulsory Acquisition must be accompanied by an IER that states whether the terms in the notice give a "fair value" for the securities concerned, together with the reasons for that opinion.
- 41 The IER must be prepared by a person nominated by ASIC. LEA was one of the firms nominated by ASIC.
- 42 Consequently, the Directors of North Limited have requested that LEA prepare an IER which sets out our opinion on whether the terms in its notice give a "fair value" for the ERA shares (i.e. whether the Proposed Consideration is "fair").
- 43 It should be noted that this report contains general financial product advice only and has been prepared without taking into account the personal objectives, financial situations or needs of individual ERA shareholders. Accordingly, before acting in relation to the Compulsory Acquisition shareholders should have regard to their own objectives, financial situation and needs. ERA shareholders should also read the Compulsory Acquisition Notice that has been issued by North Limited in relation to the Compulsory Acquisition.
- 44 Furthermore, this report does not constitute advice or a recommendation (inferred or otherwise) as to whether ERA shareholders should accept or object to the Compulsory Acquisition. This is a matter for individual ERA shareholders based upon their own views as to value, their expectations about future economic and market conditions and their particular personal circumstances including their risk profile, liquidity preference, investment strategy, portfolio structure and tax position. If ERA shareholders are in doubt about the action they should take in relation to the Compulsory Acquisition or matters dealt with in this report, shareholders should seek independent professional advice.

Basis of assessment

- 45 In preparing our report we have given due consideration to the provisions of the Corporations Act and the Regulatory Guides issued by ASIC including, in particular, RG 111²⁰ and Regulatory Guide 10 – *Compulsory acquisitions and buyouts* (RG 10).
- 46 To determine what is "fair value", s667C(1) of the Corporations Act requires that an expert:

²⁰ Which sets out the assessment framework to which an expert must adhere in evaluating the merits of a proposal.

- “(a) first, assess the value of the company as a whole; and
- (b) then allocate that value among the classes of issued securities in the company (taking into account the relative financial risk, and voting and distribution rights, of the classes); and
- (c) then allocate the value of each class pro rata among the securities in that class (without allowing a premium or applying a discount for particular securities in that class).”

47 In determining the “fair value” of the securities, an expert must also take into account the prices paid for securities in that class in the previous six months (s667C(2)).

48 While neither the Corporations Act nor RG 111 provide any specific guidance on how the expert is to assess the “*value of the company as a whole*”, RG 111 does provide guidance on the valuation approach that an expert is to adopt in the context of a control transaction, being a transaction where a person acquires, or increases, a controlling stake in a company. In these circumstances, RG 111 requires value is to be assessed on a 100% controlling interest basis assuming, consistent with general market value principles, the price is negotiated between a knowledgeable and willing, but not anxious, buyer and a knowledgeable and willing but not anxious seller acting at arm’s length.

49 Although the 100% controlling interest should reflect synergy benefits that are available to the market as a whole (e.g. public company cost savings etc.) any special value that may be derived by a particular “bidder” should not be taken into account (e.g. synergies that are not available to other bidders). RG 111.50 further notes that in the context of a compulsory acquisition, judicial authority generally holds that experts should not reflect any “special value” that might accrue to the acquirer. Likewise, experts should avoid adding any premium to account for forced divestment.

50 A control transaction is considered “fair” if the value of the consideration offered is equal to, or greater than, the value of the shares that are the subject of the offer.

51 Having regard to the above, our report has therefore considered:

- (a) the market value of ERA as a whole, which we have divided by the number of ordinary shares on issue²¹ to determine the value of the ordinary shares in ERA (on a 100% controlling interest basis)²²
- (b) the value of the Proposed Consideration (i.e. \$0.002 cash per ordinary ERA share)
- (c) the extent to which (a) and (b) differ, in order to assess whether the Proposed Consideration provides “fair value” for the ordinary shares.

²¹ Noting that ERA has only one class of share on issue.

²² As a cross-check of our assessment of ERA shares we have also considered recent share price trading including prices paid for ordinary shares in ERA in the previous six months (per s667C(2)).

Reliance on independent technical specialist

- 52 To assist us to assess the value of the Ranger Project Area rehabilitation liabilities and the value attributable to MLN1 and other tenements or interests in land held by ERA, LEA appointed SRK.
- 53 LEA has relied on the work undertaken by SRK when forming our opinion on the value of the Ranger Project Area rehabilitation liabilities and the value attributable to MLN1 and other tenements or interests in land held by ERA. SRK possesses the appropriate qualifications and experience in the industry to make such assessments. SRK, LEA and Rio Tinto believe that SRK is independent of Rio Tinto and ERA²³. The SRK Report has been prepared in accordance with the Australasian Code for Public Reporting of Technical Assessments and Valuation of Mineral Assets (2015 Edition) (the VALMIN Code) and the JORC Code.
- 54 LEA is satisfied with the valuation methodologies adopted by SRK, and we believe they are in accordance with industry practices. Discussion of the valuation methodologies adopted by SRK and SRK's findings are referenced in the body of this report and in further detail in the SRK Report.
- 55 SRK has provided consent for the use of its report in preparing this report and a copy of the SRK Report is annexed to this IER at Annexure A.

Limitations and reliance on information

- 56 Our opinions are based on the economic, share market, financial and other conditions and expectations prevailing at the date of this report. Such conditions can change significantly over relatively short periods of time.
- 57 Our report is also based upon financial and other information provided primarily by ERA and their advisers and supplemented by Rio Tinto and their advisers, where requested. The information provided included mine closure plans, tenement information, permitting information and agreements, impairment analyses, board and committee papers and financial and management account information. ERA is responsible for the information contained in the mine closure plans, geological data and impairment analyses, board and committee papers and financial and management information. LEA and SRK have considered and, where appropriate, relied upon this information and believe that the information provided is reliable, complete and not misleading and we have no reason to believe that material facts have been withheld. LEA understands the accounting and other financial information that was provided to us has been prepared in accordance with the Australian equivalents to International Financial Reporting Standards.
- 58 The information provided was evaluated through analysis, enquiry and review to the extent considered appropriate for the purpose of forming an opinion on the "fair value" of ERA's ordinary shares. However, we do not warrant that our enquiries have identified or verified all of the matters which an audit, extensive examination or "due diligence" investigation might disclose. Whilst LEA has made what it considers to be appropriate enquiries for the purpose of forming its opinion, "due diligence" of the type undertaken by companies and their

²³ For the avoidance of doubt, LEA notes that in 2022, at the request of Grant Thornton Corporate Finance Pty Ltd (Grant Thornton), SRK prepared a Technical Specialist Report in relation to ERA's mineral interests and rehabilitation liabilities. A copy of SRK's Technical Specialist Report was published, as an annexure to the IER prepared by Grant Thornton, by ERA on 26 September 2022.

advisers in relation to (for example) prospectuses or profit forecasts is beyond the scope of an IER.

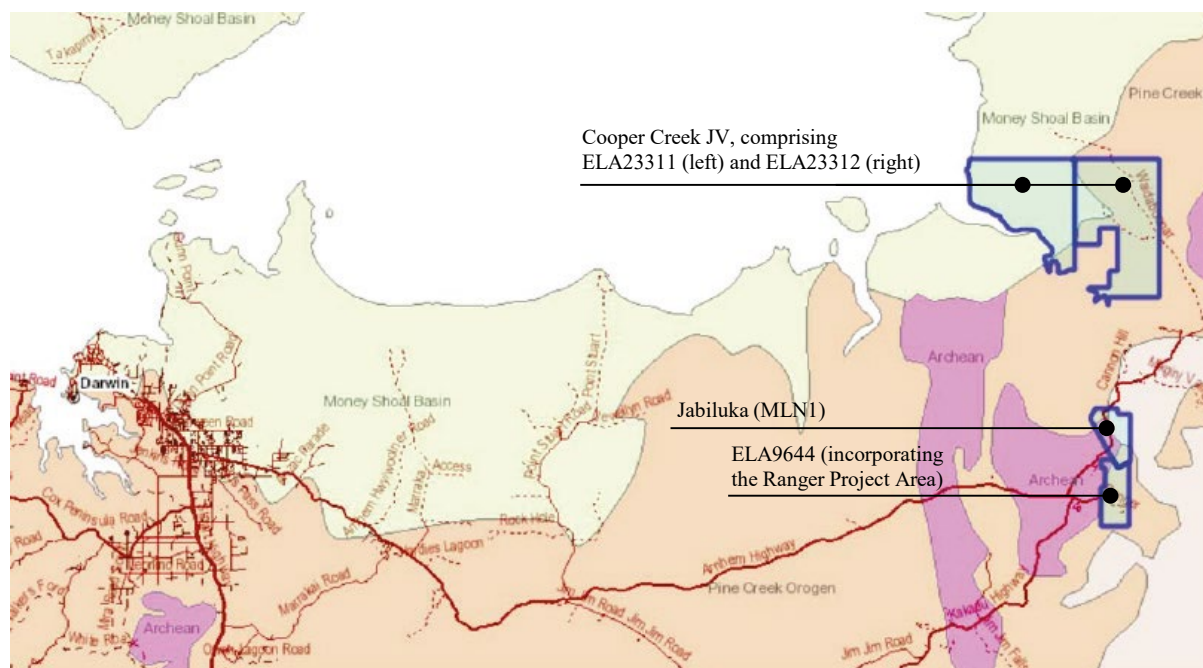
- 59 Accordingly, this report and the opinions expressed therein should be considered more in the nature of an overall review of the anticipated commercial and financial implications of the Compulsory Acquisition, rather than a comprehensive audit or investigation of detailed matters. Further, this report and the opinions therein, must be considered as a whole. Selecting specific sections or opinions without context or considering all factors together, could create a misleading or incorrect view or opinion. This report is a result of a complex valuation process that does not lend itself to a partial analysis or summary.
- 60 An important part of the information base used in forming an opinion of the kind expressed in this report is comprised of the opinions and judgement of management of the relevant companies. This type of information has also been evaluated through analysis, enquiry and review to the extent practical. However, it must be recognised that such information is not always capable of external verification or validation.
- 61 We in no way guarantee the achievability of budgets or forecasts of future profits. Budgets and forecasts are inherently uncertain. They are predictions by management of future events which cannot be assured and are necessarily based on assumptions of future events, many of which are beyond the control of management. Actual results may vary significantly from forecasts and budgets with consequential valuation impacts.
- 62 LEA's analysis and opinions assume:
- (a) no material changes to the terms of the Compulsory Acquisition as set out in the draft Compulsory Acquisition Notice provided to LEA on or around the date of this report and that the information set out in the Compulsory Acquisition Notice (other than this report which forms an annexure to that notice), once finalised, is complete, accurate and fairly presented
 - (b) title and land access permissions that provide ERA rights of access to the Ranger Project Area, MLN1 and other exploration licence areas remain in force other than as expressly indicated within this report or as disclosed by ERA
 - (c) information obtained and relied upon by LEA from the public domain is accurate and reliable.

III Profile of ERA

Overview

- 63 ERA is an ASX listed uranium miner with operations in the NT. At the date of this report, ERA's principal operations were the rehabilitation of the former Ranger uranium mine, which ceased mining operations in 2012 and ceased processing operations in January 2021. ERA is the holder of MLN1, on which the Jabiluka uranium deposit is located. MLN1 was due for renewal in August 2024 but was not renewed by the NT Government on advice from the relevant Commonwealth Government Minister. ERA is currently challenging that decision in the Federal Court of Australia.
- 64 ERA was established in February 1980 and floated on the ASX in November of that year.
- 65 ERA's current tenements comprise two exploration licence applications for the Cooper Creek Joint Venture Project (Cooper Creek JV), MLN1 (Jabiluka) and ELA9644.

ERA tenements



Note:

- 1 Excludes the s41 Authority issued under the Atomic Energy Act. The entire area of the Ranger Project Area, which includes the exhausted Ranger deposit and the undeveloped Ranger 3 Deeps deposit, is underlain by EL9644 originally granted under the *Mining Act 1980* (NT) but subsequently transitioned to an EL application under the Mineral Titles Act 2010.

Source: NT Government STRIKE database (<http://strike.nt.gov.au/>).

Ranger Project Area²⁴

- 66 The former Ranger mine lies within the 79 sqkm Ranger Project Area, located 8 km east of Jabiru and 260 km east of Darwin, in the NT. ERA's operations in the Ranger Project Area are undertaken pursuant to an authorisation granted under s41 of the *Atomic Energy Act 1953* (Cth) (the Atomic Energy Act) (the Section 41 Authority²⁵).
- 67 The Ranger ore bodies were discovered in 1969 by Electrolytic Zinc Company of Australasia and Peko-Wallsend Operations Ltd. The Commonwealth Government took half of the ownership of the ore bodies in 1974.
- 68 The Ranger Uranium Environmental Inquiry was established in 1975 and following presentation of the final report in 1977, which found that uranium mining could proceed, an agreement covering mining was signed between the Commonwealth and the Northern Land Council (NLC)²⁶, representing the interests of the Traditional Owners of the area.
- 69 Construction at the Ranger Project Area commenced in 1979 and the first drum of uranium oxide was produced on 13 August 1981.
- 70 Using open cut methods, mining of Ranger Pit 1 ore body commenced in May 1980.
- 71 Final approval to mine Ranger Pit 3 ore body (located 1 km north of Ranger Pit 1) was received from the NT Government in May 1996. Open cut mining of this ore body commenced in July 1997.
- 72 Mining from Ranger Pit 1 continued until December 1994. Mining from Ranger Pit 3 commenced in July 1997 and concluded in November 2012. Processing of the ore mined continued until 8 January 2021 when the Section 41 Authority required processing to cease. The last drum of uranium oxide was sold on 31 May 2022 after producing a total of 132,000 tonnes of uranium oxide.
- 73 In 2009, ERA announced the discovery of the Ranger 3 Deeps underground resource. The Ranger 3 Deeps ore body was estimated at 43,858 tonnes of contained uranium oxide, comprised of 19.58 million tonnes (Mt) at an overall grade of 0.244% U₃O₈. In 2015, ERA decided not to progress the Ranger 3 Deeps project, initially placing the exploration decline and associated infrastructure under care and maintenance, and in August 2021 ERA completed backfill works on the Ranger 3 Deeps decline²⁷. Given this, the project's unsatisfactory economic viability²⁸ and the circumstance that ERA currently (since 8 January 2021) has no authority to conduct mining operations in the Ranger Project Area and

²⁴ Source: ERA website and Annual Report for the year ended 31 December 2023 and document entitled *ERA History* from the NT Government Geoscience Exploration and Mining Information System (GEMIS) database (<https://geoscience.nt.gov.au/gemis/ntgsjspui/handle/1/74024>), unless otherwise indicated.

²⁵ The original Section 41 Authority was granted to Peko-Wallsend Operations Ltd, Electrolytic Zinc Company of Australasia Limited and the Australian Atomic Energy Commission in January 1979. The original Section 41 Authority was assigned to ERA in September 1980.

²⁶ Under s44 of the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth).

²⁷ Source: ERA Annual Report 2021.

²⁸ ERA has stated that it has historically assessed the economics of the Ranger 3 Deeps project to be unviable, and considering work undertaken to rehabilitate the Ranger Project Area, a standalone mill and tailings construction, among other infrastructure would be required to support development of the Ranger 3 Deeps deposit, further materially challenging the project's economic viability.

therefore development of the Ranger 3 Deeps deposit is not an authorised activity, no work is being conducted on further development options for the Ranger 3 Deeps deposit.

74 Activities at the Ranger Project Area are now limited to rehabilitation.

Ranger Project Area – closure domains



Source: Ranger Mine Closure Plan 2024.

Ranger Project Area regulation

75 As of 1 July 2024, the key instrument that governs operations on a day-to-day basis is Deemed Mining Licence 0108-18, which comprises the Ranger Authorisation 0108-18 (Ranger Authorisation) and the latest approved Ranger Mine Closure Plan.

76 Regulation of the Ranger Project Area is conducted by both the Commonwealth and NT Governments. Twelve Acts and approximately 300 obligations are of relevance to the Ranger Project Area rehabilitation activities²⁹. These are set out in broad terms as follows.

²⁹ A Memorandum of Understanding has been formed in relation to the Working Arrangements for the Regulation of Uranium Mining in the NT, the purpose of which is to establish procedures for consultation between the Commonwealth of Australia and the Northern Territory of Australia in the performance of their legislative

Commonwealth legislation

- 77 The Atomic Energy Act vests ownership of uranium in the NT to the Commonwealth of Australia. ERA's rehabilitation activities (and former mining activities) are conducted under the Section 41 Authority granted pursuant to s41 of the Atomic Energy Act. The Section 41 Authority provides the key tenure and land access approval required for the mine.
- 78 There are certain environmental requirements³⁰ (ERs) attached to the Section 41 Authority, which set out primary and secondary environmental objectives and establish the principles by which the Ranger Project Area operations are to be conducted, closed and rehabilitated, and the standards that are to be achieved (refer also paragraph 95 below). The ERs are also included in the Ranger Authorisation.
- 79 The *Environment Protection (Alligator Rivers Region) Act 1978* (Cth) establishes the functions and responsibilities of the Office of the Supervising Scientist (OSS) which include monitoring and advising governments on the Ranger Project Area's environmental effects, as well as establishing the Environmental Research Institute of the Supervising Scientist (ERISS) and the Alligator Rivers Region Advisory Committee.
- 80 Title to the Ranger Project Area was granted to the Kakadu Aboriginal Land Trust in 1978, in accordance with the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth) (Aboriginal Land Rights Act). Prior to the Commonwealth Minister approving the project, the Commonwealth Government entered into a Section 44 Agreement with the NLC under the Aboriginal Land Rights Act. Subsequent to the mining use of the Ranger Project Area, the land will be "Aboriginal land", which means an Aboriginal Land Trust subject to the Aboriginal Land Rights Act.
- 81 ERA has obligations with regards to the possession and disposal of nuclear material under the *Nuclear Non-Proliferation (Safeguards) Act 1987* (Cth). This legislation principally relates to the following:
- (a) ERA is the holder of a Permit to Possess Nuclear Material (PN004), which currently relates to the retained waste containing uranium that is present within the on-site calciner
 - (b) ERA is the holder of a Permit to Decommission Facility (DF003), which relates to the plant, structures and buildings previously used for the mining, processing, production, storage and transport of uranium ore concentrates
 - (c) ERA is yet to obtain a permit that allows the removal and disposal of the calciner from its currently approved location. An additional permit will be required from the Australian Safeguards and Non-Proliferation Office (ASNO) before the calciner can be removed from its current location and disposed into Pit 3.

functions with "maximum efficiency and minimum duplication". The Working Arrangements also establish the functions of the Ranger Minesite Technical Committee.

30 *Environmental Requirements of the Commonwealth of Australia for the Operation of Ranger Uranium Mine*, accessed at <https://www.dcceew.gov.au/science-research/supervising-scientist/publications/environmental-requirements-ranger-uranium-mine>.

NT legislation

- 82 The *Mining Management Act 2001* (NT) was the primary NT legislative instrument for the Ranger Project Area. The Ranger Authorisation was issued to ERA under this legislation, which also required ERA to annually submit a Mining Management Plan for the approval of the relevant Commonwealth and NT Ministers, with advice provided by the OSS. The *Environment Protection Act 2019* (NT) repealed the *Mining Management Act 2001* (NT) on 1 July 2024, with s308 of the new legislation setting out the transitional arrangements that apply to a Mining Management Plan (the Mine Closure Plan in the case of the Ranger Project Area operations).
- 83 All sacred sites in the NT are protected by the *Northern Territory Aboriginal Sacred Sites Act 1989* (NT), with the Aboriginal Areas Protection Authority being an independent statutory authority established under the legislation, responsible for overseeing the protection of Aboriginal sacred sites in the NT. An authority certificate is a non-compulsory certificate that may be applied for, to identify and record any sacred sites and any conditions to be observed to protect these sites, during the conduct of works. ERA currently holds an authority certificate for mining activities at the Ranger Project Area and has applied for an authority certificate for rehabilitation.

Commonwealth agreements

- 84 As the Ranger Project Area is on Aboriginal land, the Commonwealth Government has an agreement with the NLC that facilitates ERA's access to the area, consistent with the Aboriginal Land Rights Act.
- 85 The Commonwealth Government also holds a security for rehabilitation of the Ranger mine under a separate agreement with ERA³¹.

Ranger rehabilitation

- 86 Under the Section 41 Authority, ERA must rehabilitate the Ranger Project Area to establish an environment similar to the adjacent areas of the surrounding Kakadu National Park. Each year, ERA must submit a Mine Closure Plan to the relevant NT and Commonwealth Ministers for approval. The OSS, NLC and Gundjehmi Aboriginal Corporation (GAC) (on behalf of the Mirarr Traditional Owners) also assess the Mine Closure Plan and provide advice to the Ministers. The Ministers must consider this advice when deciding whether to approve the Mine Closure Plan. The Mine Closure Plan, including the rehabilitation strategy, becomes binding and enforceable when it is approved by the Ministers. The Ministers can approve the plan, wholly or in part, and with conditions. If the Commonwealth Minister does not approve the Mine Closure Plan, ERA can submit an amended plan.
- 87 A Mine Closure Plan was first prepared and released to the public in June 2018 following stakeholder engagement and formally submitted to the relevant NT and Commonwealth Ministers for approval in July 2018. Following a period of review, that plan was approved by both Ministers in December 2018³².

³¹ Source: Australian Government, Department of Industry, Science and Resources (DISR) website (industry.gov.au) accessed 8 February 2025 and the Ranger Mine Closure Plan 2024.

³² Source: ERA Annual Report 2018.

- 88 The key tasks forming the basis of the closure strategy include(d):
- (a) treatment of all pond and process water inventories
 - (b) remediation of the tailings storage facility and contaminated sites
 - (c) transfer of tailings from the tailings storage facility to the exhausted Pits 1 and 3
 - (d) removal and re-shaping of the stockpiles and disturbed areas of the Ranger Project Area to establish a final landform; and
 - (e) revegetation of the final landform using locally sourced native seeds.
- 89 In 2017, ERA commenced a Ranger Project Area closure feasibility study to further refine the schedule, rehabilitation activities and execution of the 2018 Mine Closure Plan. The approval and implementation of this study resulted in an increase in the rehabilitation provision of some \$343 million (during 2018)³³.
- 90 Bulk material movement to backfill Pit 1 was completed during 2020³⁴, and following the cessation of operations in January 2021, work commenced on the decommissioning and make-safe of the processing plant infrastructure, which was completed in July 2021 with the final demolition of the processing plant scheduled to coincide with Pit 3 bulk backfill³⁵.
- 91 In the second half of 2021, ERA commenced a major reforecast of both cost and schedule in relation to the calculation of the rehabilitation provision, engaging consultant firm Bechtel (Western Australia) Pty Ltd (Bechtel) to perform an independent review and gap analysis. The preliminary findings by ERA from its reforecast resulted in an increase in the provision of some \$668 million (during 2021)³⁶.
- 92 In May 2022, ERA commenced a feasibility study update in connection with a lower risk rehabilitation methodology (primarily relating to the subaerial capping of Pit 3) and to further refine the Ranger Project Area rehabilitation exercise³⁷. This feasibility study was received in October 2023 and resulted in a change in the estimate of some \$1.36 billion, with an overall increase in the non-current rehabilitation provision of some \$1.16 billion in 2023³⁸.
- 93 In April 2024, ERA appointed Rio Tinto to manage the Ranger Project Area rehabilitation project under the MSA. Under the MSA, Rio Tinto will, on ERA's behalf and in accordance with plans and budgets approved by the ERA Board, manage all aspects of the rehabilitation of the Ranger Project Area, including project management and execution of all rehabilitation activities. In relation to the MSA, ERA noted that ERA's Independent Board Committee concluded that there was "*significant value for ERA, and potential cost savings, in directly leveraging Rio Tinto's mine rehabilitation, project management experience and capability to support the safe and efficient delivery of the Ranger Rehabilitation Project*"³⁹

³³ Source: ERA Annual Report 2018.

³⁴ Source: ERA Annual Report 2020.

³⁵ Source: ERA Annual Report 2021.

³⁶ Source: ERA Annual Report 2021.

³⁷ Source: ERA Annual Report 2022.

³⁸ Source: ERA Annual Report 2023.

³⁹ Source: ERA announcement *ERA appoints Rio Tinto to manage the Ranger Rehabilitation Project* 3 April 2024.

- 94 On 1 October 2024, the Ranger Project Area team submitted the 2024 Ranger Mine Closure Plan for approval by Commonwealth and NT Ministers. Commonwealth ministerial approval for the 2023 Mine Closure Plan was received on 6 February 2025, with some exclusions to be addressed through separate applications⁴⁰.
- 95 The environmental protection conditions within which ERA has operated and must now close the former mine are set out in the ERs. The ERs are attached to the Section 41 Authority. The rehabilitation activities at the Ranger Project Area are also conducted in accordance with Deemed Mining Licence DML0108-18.
- 96 The Atomic Energy Act included an end date for closure activities at Ranger of 8 January 2026. In November 2022, the *Atomic Energy Amendment (Mine Rehabilitation and Closure) Act 2022* (Cth) was passed, with the key effects of the amendments being to allow the Minister to vary or confer a new authority for the express purpose of authorising rehabilitation, remediation and monitoring activities at the Ranger Project Area to extend beyond the previously legislated deadline. The amendment also outlines a process for the progressive relinquishment (close-out) of parts of the Ranger Project Area⁴¹.
- 97 ERA is working with the Commonwealth Government, the NLC and GAC to negotiate the revised Section 41 Authority for the Ranger Project Area, and applied for a new authority (a “Rehabilitation Authority” as defined in s41CA of the Atomic Energy Act) on 27 May 2024⁴².

Ranger Mine Closure Plans

- 98 As referenced above, submitting an annual Mine Closure Plan is a requirement under the ERs attached to the Section 41 Authority. The Mine Closure Plan demonstrates how the proposed closure activities will achieve the ERs across six themes, comprising:
- (a) landform
 - (b) water and sediment
 - (c) soils
 - (d) ecosystems
 - (e) radiation
 - (f) cultural.
- 99 In broad terms, the overall Ranger Project Area rehabilitation works comprise:
- (a) reducing the current and future process water inventory to zero through concentrating process water to brine, which is then injected into the Pit 3 underfill. Process water is water that has come into contact with contaminated material
 - (b) reducing pond water inventory to zero through treating collected pond water and releasing it to the environment outside the Ranger Project Area. Pond water is rainwater runoff from the mine disturbed areas that is treated by brine squeezer and ultra

⁴⁰ Source: ERA Annual Report 2024.

⁴¹ Source: ERA *Ranger mine closure plan 2024 – Executive Summary*.

⁴² Source: ERA *Ranger mine closure plan 2024 – Executive Summary*.

filtration reverse osmosis water treatment plants to meet water quality requirements for release to the Magela Creek as release water

- (c) replacing the existing Ranger power station and brine concentrator power station with an independent power station
- (d) bulk material movement to achieve the final landform topography, including the movement of bulk material from source areas (e.g. stockpiles, Ranger Water Dam) to destination areas (Pit 3, retention ponds and other areas) in accordance with the final landform topography and to ensure that mineralised material is deposited at the required depth in Pit 3 or Retention Pond 2⁴³
- (e) revegetation of rehabilitated areas of the Ranger Project Area as required to establish the flora and fauna similar to surrounding areas of Kakadu National Park
- (f) turnover of areas after completion of project scope to ERA's Monitoring and Maintenance Team which is responsible for monitoring the progress of rehabilitation until such time as the Ranger Project Area is relinquished (that is, receives a Close-out Certificate from the Commonwealth and Territory Ministers)⁴⁴

100 A phased program management approach has been adopted for the Ranger Project Area rehabilitation works, reflecting several proposed tranches of scope, funding and execution. The four tranches identified are:

- (a) Tranche 1A (Q2 2023 – Q3 2027): Phase 1 demolition, Pit 3 initial and secondary capping and further studies
- (b) Tranche 1B (commencing 2025): Implementation of process water treatment technologies
- (c) Tranche 2 (commencing 2027): Ranger Water Dam deconstruction, final landform, and revegetation
- (d) Tranche 3: Monitoring and Maintenance following completion of project activities⁴⁵.

101 The 2023 Mine Closure Plan was submitted for approval on 1 December 2023 and Commonwealth Ministerial approval was received on 6 February 2025⁴⁶. The 2024 Mine Closure Plan was released in October 2024 and has been submitted to the NT Government for approval.

102 The most recently prepared (2024) Mine Closure Plan identifies 11 "Closure Domains", with closure activities broadly comprising the following:

⁴³ Retention ponds serve to control sediment, dilute water and store pond and managed release waters.

⁴⁴ Source: *Ranger Rehabilitation Project Feasibility Reforecast – 2023 – Basis of Estimate Tranche 1a*, Bechtel (Western Australia) Pty Ltd, Revision 0 dated 24 October 2023.

⁴⁵ Source: *ERA Basis of Schedule, Ranger Rehabilitation Project 2023 Feasibility Study, Level 3 Schedule Tranche 1A*, Revision 0 dated 24 October 2023.

⁴⁶ ERA Annual Report 2024.

Ranger rehabilitation – closure activity summary

Domain	Principal activities completed	Current and future activity
Pit 1	Completed - Install underdrain, deposit tailings, dewatering and consolidation of tailings, install geotextile layer, initial capping, full backfill, scarification of the landform, rehabilitation planting and creation of habitat via rock features	<ul style="list-style-type: none"> • Removal of pit tailings flux (process water) via decant wells, monitoring, maintenance and adaptive management activities to inform surface water runoff and ecosystem re-establishment • Contour perimeter drain backfilled to final landform and removal of roads and other infrastructure
Pit 3	Underfill, underdrain and dewatering systems completed, tailings disposed from mill processing completed, tailings floor transferred, wicking to assist dewatering and consolidation	<ul style="list-style-type: none"> • Dewatering, brine injection into the underfill zone via pit wall directional drilling, installation of geotextile and initial and secondary capping, backfill, placement of demolished plant and other infrastructure / materials into Pit 3, progressive waste disposal and bulk backfill, final 6 metres of landform and revegetation
Tailings / Ranger Water Dam	Tailings transfer to Pit 3, cleaning of remnant tailings from walls and floor, process water received from Pit 3	<ul style="list-style-type: none"> • Process water storage and evaporation, Ranger Water Dam deconstruction and final landform and revegetation
Land Application Areas	Used for disposal of release water during the dry season when required	<ul style="list-style-type: none"> • Ongoing disposal of release water when required, sampling to confirm levels of contamination and removal from Ranger Contaminated Sites Register if applicable, progressive remove of aboveground infrastructure, progressive remediation of any contamination and progressive revegetation
Process plant, water treatment plant and other infrastructure	Decommissioning of infrastructure associated with the leaching and solvent extraction circuits and areas of calcination, drying and product packing	<ul style="list-style-type: none"> • Current - Sampling of contaminated material, ongoing use of water treatment facilities (e.g. brine concentrator, brine squeezer, water treatment plants), fuel storage, power station plants and administration buildings • Future – demolition of process plant, treatment of water, remediation of contaminated sites and revegetation
Stockpiles	Stockpiled waste used to backfill Pit 1, create final landform of remediated areas and progressive rehabilitation of smaller areas	<ul style="list-style-type: none"> • Current – weed and water management, preparing for capping • Future – initial capping and bulk material movement for Pit 3 backfill, bulk material for Ranger Project Area final landform
Water management areas	Ongoing use	<ul style="list-style-type: none"> • Ongoing water storage, dust suppression and management, release of treated water, sampling for contaminated material, progressive remediation, backfill and rehabilitation retention ponds, water storages and wetland filters
Linear infrastructure	Rehabilitation of redundant tracks, supporting ongoing activities	<ul style="list-style-type: none"> • Ongoing use, will provide access during monitoring phase, progressive removal and rehabilitation

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Ranger rehabilitation – closure activity summary		
Domain	Principal activities completed	Current and future activity
Miscellaneous areas	Trial landform constructed in 2009 to investigate plantings in waste rock, Ranger Mine village and workshops rehabilitated, explosives removed and site deregistered	<ul style="list-style-type: none"> • Current – ongoing use of plant nursery, trail landform, Magela Creek levee and some landfill sites • Future – relocating office space and gatehouse, plant nursery expansion, core yard decommissioned and rehabilitated, progressive decommissioning, remediation, backfill and remediation of miscellaneous areas
Airport and ERISS offices	Ongoing use	<ul style="list-style-type: none"> • Potential handover to third-party operator after engagement with stakeholders. If no agreement is reached for the handover of the domain to a third party operator, ERA is obliged to decommission and rehabilitate the site
Residual areas	Exploration areas	<ul style="list-style-type: none"> • Progressive rehabilitation and handover of some access tracks to the Mirarr Traditional Owners

Note:

1 Standalone approval application for Pit 3 backfill lodged September 2023 and approved August 2024.
Source: Ranger Mine Closure Plan 2024 (Executive Summary).

Closure Criteria

103 ERA has established Closure Criteria, which are derived from the ERs, that are the product of negotiations between stakeholders and are ultimately approved by the Commonwealth Minister for Resources and Northern Australia. As at the time of writing, there were 54 criteria, addressing the six themes referenced at paragraph 98 above. Of those 54 criteria, 51 had received approval:

Ranger Closure Criteria			
Theme	Total number	Number approved	Number in draft
Landform	5	5	0
Water and sediment	4	4	0
Soils	3	0	3
Ecosystems	2	2	0
Radiation	23	23	0
Cultural	4	4	0
	13	13	0
Total	54	51	3

Source: ERA management.

Rehabilitation provision

104 The rehabilitation provision recognised by ERA at 31 December 2024 amounts to some \$2.423 billion⁴⁷ in present value terms (31 December 2023: \$2.420 billion).

⁴⁷ Includes \$1 million in relation to MLN1.

105 ERA has identified major risks to the provision estimate that include:

- (a) study driven scope variation – ongoing study work may identify different rehabilitation solutions that may result in a decrease or increase in rehabilitation costs
- (b) water treatment and injection of waste brine – components of the estimate are contingent on future weather events not within the control of the business. Should water treatment inventories be materially under or overstated in current estimates a corresponding and material impact would be encountered to overall project schedule and resulting cost
- (c) tailings consolidation – the cost and schedule of completing rehabilitation works could be adversely impacted if the timeframe for tailings to consolidate, or the timeframe for the end of process water collection, extend further
- (d) bulk material movements – a substantial portion of the estimated future costs comprise the backfill of Pit 3 and the deconstruction of the Ranger Water Dam. Any material under or overstatement of bulk material movement volumes or unit costs in current estimates may result in substantial impacts, affecting both the project schedule and overall project costs. The pricing of bulk material movements is subject to market forces that are not fully within ERA’s control
- (e) other factors – such as evaporation rates, stakeholder requirements, higher costs of relinquishing Jabiru township housing, engineering studies, other site contaminants, plant mortality and project support costs⁴⁸.

106 As referenced at paragraph 93 above, ERA has noted the potential for cost savings to arise from the MSA. ERA has also noted that:

- (a) the MSA is priced on a cost recovery basis and ERA has the right to approve each plan and budget
- (b) there is a risk that ERA’s assumptions and expectations, in relation to the value and cost savings arising from the MSA, may change or prove to be inaccurate such that the expected value and cost savings do not materialise to the extent expected by ERA or at all
- (c) any savings that might be available are not yet incorporated into the provision⁴⁹.

107 LEA notes the following disclosure made by ERA regarding the rehabilitation provision:

“The rehabilitation of the Ranger Project Area is the largest ever project of its kind in Australia with unique levels of complexity and risk. As such it is reasonably possible that outcomes from within the next financial year may be different from the current cost estimate and could require material adjustment to the rehabilitation provision for the Ranger Project Area.”⁵⁰

⁴⁸ Source: ERA Annual Report 2024.

⁴⁹ Source: ERA announcement *Capital raising presentation (for Entitlement offer)* 29 August 2024.

⁵⁰ Source: ERA Annual Report 2024.

Key rehabilitation announcements

108 A summary of key disclosures relating to the Ranger Project Area rehabilitation follows:

Ranger rehabilitation – key disclosures (January 2021 to present)	
Jun 2021	<ul style="list-style-type: none"> Rehabilitation provision reported as \$656 million, discounted at 1.5% (real) (June 2021 half year reporting)
Sep 2021	<ul style="list-style-type: none"> ERA noted disclosed cost and schedule overruns. The full extent of these overruns was not known and ERA would update the market in due course
Oct 2021	<ul style="list-style-type: none"> Whilst ERA was not yet in a position to provide estimates with an acceptable degree of confidence, the Company disclosed it was apparent that the cost and schedule overruns would be material ERA would update the market when the reforecast cost and schedule reached an acceptable degree of confidence
Nov 2021	<ul style="list-style-type: none"> ERA disclosed whilst it was still not yet in a position to provide estimates with an acceptable degree of confidence, the progress of that work had identified that both the cost and schedule overruns in executing the current Mine Closure Plan were expected to be significant, relative to the findings of the Ranger Project Area closure feasibility study ERA was in the process of appointing a global engineering company to assist in finalising its reforecast with an acceptable degree of confidence
Feb 2022	<ul style="list-style-type: none"> Bechtel was engaged to perform an independent review and gap analysis of ERA's forecast cost and schedule data The preliminary findings indicated that the revised total cost of completing the Ranger Project Area rehabilitation, including incurred spend from 1 January 2019, is forecast to be approximately between \$1.6 billion and \$2.2 billion, with a revised date for completion to be between Q4 2027 and Q4 2028.
Mar 2022	<ul style="list-style-type: none"> Rehabilitation provision as at 31 December 2021 reported as \$1,251 million, discounted at 1.5% (real)
May 2022	<ul style="list-style-type: none"> ERA commenced a feasibility study update in connection with a lower technical risk rehabilitation methodology (primarily relating to the subaerial capping of Pit 3) and to further refine the Ranger Project Area rehabilitation execution scope, risks, cost and schedule (2022 Feasibility Study)
Nov 2022	<ul style="list-style-type: none"> ERA received confirmation from the Commonwealth that its application for a Ranger Mine Closure Interim Payment (\$56.8 million) from the Ranger Rehabilitation Trust Fund had been approved by the relevant Minister
Mar 2023	<ul style="list-style-type: none"> ERA updated the mine closure plan, and appointed Bechtel to support the 2022 Feasibility Study. ERA anticipated the revised total cost of completing the Ranger Project Area rehabilitation (including expenditure incurred since 1 January 2019) to be between approximately \$1.6 billion and \$2.2 billion⁽¹⁾, with a revised date for completion of between 4Q27 and 4Q28 The forecast cost overruns were caused by a number of factors including complexities in technical risk management, project delays and additional scope matters involving unbudgeted costs. Alongside other factors, risks identified by ERA at the time of its previous 2019 entitlement offer had materialised, including increased cost pressures and technical challenges to meet the January 2026 deadline for completing the rehabilitation of the Ranger Project Area Rehabilitation provision reported at \$1,261 million at 31 December 2022, discounted at 1.5% (real)
Aug 2023	<ul style="list-style-type: none"> The 2022 Feasibility Study was progressing, and as a result of the preliminary findings the cost of closure estimate increased by \$368 million, bringing the estimated total cost of completing the Ranger Project Area rehabilitation to \$2.18 billion. Rehabilitation provision reported at \$1.446 million at 30 June 2024 (in present value, discounted at 2% (real))

Ranger rehabilitation – key disclosures (January 2021 to present)

Sep 2023	<ul style="list-style-type: none"> • ERA expected to receive the final 2022 Feasibility Study in October 2023. • Although ERA was unable to confirm the estimated complete project schedule and total costs at this time, ERA expected the total rehabilitation costs to materially exceed the previous estimated range of \$1.6 billion to \$2.2 billion, and that the expected final completion date would also be delayed
Oct 2023	<ul style="list-style-type: none"> • ERA was unable to confirm the estimated complete project schedule and total rehabilitation costs at this time, due to a number of uncertainties including the review of the outcomes and data from the 2022 Feasibility Study, the outcome of the additional studies and the further work to be undertaken by ERA to verify and attempt to mitigate estimated costs identified in those studies • Total rehabilitation costs were expected to materially exceed the previous estimated range of \$1.6 billion to \$2.2 billion • Further funding was expected to be required by ERA in 2024 when sufficient certainty was obtained on the expenditure requirements for the first tranche of program management components for the Ranger Project Area rehabilitation
Dec 2023	<ul style="list-style-type: none"> • The Board of Directors of ERA expected to record a provision of approximately \$2.3 billion based on available information, up from \$1.5 billion in HY23 • ERA expected to spend approximately \$1.2 billion in nominal terms on rehabilitation activities up until the end of 2027
Feb/Mar 2024	<ul style="list-style-type: none"> • At 31 December 2023, the Ranger Project Area rehabilitation provision was \$2.4 billion (discounted at 2%, equating to an estimated \$3.0 billion in undiscounted nominal terms), a net increase of \$1.2 billion from the previous period
Apr 2024	<ul style="list-style-type: none"> • ERA appointed Rio Tinto to manage the Ranger Project Area rehabilitation project under a MSA
Jun 2024	<ul style="list-style-type: none"> • At 30 June 2024, the Ranger Project Area rehabilitation provision was \$2,402 million (discounted at 2.5%, equating to an estimated \$3,026 million in undiscounted nominal terms and \$2,717 million undiscounted real terms)
Oct 2024	<ul style="list-style-type: none"> • ERA released the 2024 Mine Closure Plan
Feb 2025	<ul style="list-style-type: none"> • The 2023 Mine Closure Plan received Commonwealth ministerial approval on 6 February 2025 • The 31 December 2024 Ranger Project Area rehabilitation provision was \$2,422 million.

Note:

1 Approximately \$524 million of the total cost of completing the rehabilitation of the Ranger project Area was incurred in the period 1 January 2019 to 31 December 2022.

Source: ERA ASX announcements, Annual Reports and Interim Reports.

Security deposits

109 A Ranger Rehabilitation Trust Fund has been established in accordance with the Government Agreement as Amended⁵¹, under which ERA is required to hold security deposits (the Trust Fund) with DISR. These deposits are intended to provide security against the immediate estimated costs of closing and rehabilitating the Ranger Project Area. ERA is required to prepare and submit an annual plan of rehabilitation⁵² (the Annual Plan of Rehabilitation) to

⁵¹ Source: Government Agreement as Amended, Article 25. The Government Agreement as Amended is annexed (commencing page 26) to the *Ranger Uranium Project Deed of Assignment – Commonwealth of Australia and Australian Atomic Energy Commission to Energy Resources of Australia* dated 12 September 1980, tabled in the Senate on 27 November 1980.

⁵² The Annual Plan of Rehabilitation differs from the Mine Closure Plan and is a process for costing the value of the security.

the Commonwealth Government, and once accepted, the Annual Plan of Rehabilitation is independently assessed and costed and the amount to be provided to / drawn down by ERA from funds held in the Trust Fund is then determined. The process has been paused and ERA is working to both execute works to Q3 2027 and to determine estimates for works beyond Q3 2027. Bank guarantees procured by ERA totalling \$125 million are held by the Commonwealth Government as additional security for ERA's Ranger Project Area rehabilitation obligations (and an additional \$1 million is held as an allowance for rehabilitation of the Jabiluka site).

- 110 Term deposits held by DISR at 31 December 2024 amounted to some \$515 million, excluding an approximate \$20 million in accrued interest⁵³. The deposits and bank guarantees held at 31 December 2024 were provided to the Commonwealth Government based on a review in February 2020 of the 44th Annual Plan of Rehabilitation submitted by ERA (i.e. prior to the reforecast of the cost of Ranger Project Area rehabilitation), and subsequently reduced for an interim payment of \$57 million for rehabilitation works completed from 9 January 2021 to 30 June 2022.
- 111 A review of the Government Agreement as Amended is anticipated to commence alongside the new Section 41 Authority⁵⁴ (and other associated agreements) after ERA's internal cost review has been completed and funding arrangements have been finalised. Negotiations on the new suite of agreements between ERA, the Commonwealth Government, the NLC and the GAC are currently ongoing and are expected to continue throughout 2025.
- 112 Given the increases in the estimated cost of rehabilitating the Ranger Project Area, ERA may be required to provide additional security or funds to the Trust Fund⁵⁵, and does not consider that it can rely upon drawdown of any further cash from the Trust Fund before the re-evaluation of the security arrangement is complete.

Jabiluka⁵⁶

History

- 113 The Jabiluka mining area had been subject to various exploration licenses and mining lease applications through the 1970s. In September 1977, Pancontinental Energy NL (Pancontinental) applied for block mineral leases covering the entire area within the Jabiluka mining area not already covered by mineral lease applications – other than the lease applications in respect of aggregate material. MLN1 was granted by the NT Government on 12 August 1982 for a 42-year lease period with an option to renew for 10 years.
- 114 In 1991, MLN1 was sold by Pancontinental to ERA. As part of ERA's purchase of the lease from Pancontinental, the NLC, on behalf of the Mirarr Traditional Owners, assigned Traditional Owner approvals to ERA. Jabiluka had previously received environmental approvals from the Commonwealth Government in 1979 and final Traditional Owner approvals were received in 1982. The election of the Hawke Labor Government in 1983 led

⁵³ Source: ERA management *DISR Term Deposits at Dec24.pdf*.

⁵⁴ The Commonwealth Government Minister granted ERA the Section 41 Authority under the Atomic Energy Act to mine, recover, treat and process uranium oxide (a "prescribed substance") at the Ranger mine.

⁵⁵ Source: ERA Annual Report 2023.

⁵⁶ Source: NT Government GEMIS database; MLN1 Exploration Report 2015.

to the implementation of the Labor Party's "Three Mines Policy", effectively halting Jabiluka's development.

- 115 Subsequent to the purchase of MLN1, ERA conducted a drilling program on Jabiluka 2 in 1992-1993 (resource definition and geotechnical) and underground diamond drilling in 1998-1999 as part of the development of the exploration decline.
- 116 ERA undertook a feasibility study on the Jabiluka development in 1993 and significantly changed the design of the project from that of the original Pancontinental plan. When the Coalition Government came to power in 1996 (abandoning the Labor Government's "Three Mines Policy") ERA commenced an Environmental Impact Statement (EIS) based on guidelines set out by the Commonwealth Government. In October 1996, a new EIS was submitted for public review which outlined two options:
- (a) mining and milling uranium ore at Jabiluka (similar in concept to the Traditional Owner approved Pancontinental design but smaller in impact); and
 - (b) trucking Jabiluka ore to the (then) existing Ranger Mill for processing.
- 117 In response to the public review, a supplement to this EIS was submitted in June 1997 that focused on the plan of trucking Jabiluka ore to the Ranger Mill for processing. In October 1997, the Commonwealth Government announced that the Jabiluka proposal had completed environmental procedures and would be subject to stringent conditions. In recognition of Traditional Owner approvals received in 1982, ERA also put forward the alternative proposal to process the ore at Jabiluka. This alternative was subject to a Public Environment Report and further public review. Environmental approvals for this alternative were received, subject to strict environmental conditions, in August 1998, provided ERA returned all tailings to the underground mine voids.
- 118 In May 1998, ERA began consultations with the NLC, acting on behalf of the Mirarr Traditional Owners, in relation to the change in design of the Jabiluka proposal. Final NT Government approvals for the development of the mine were received in June 1998. ERA commenced Stage 1 of development on 15 June 1998. This was completed on 4 July 1999 and included surface works, a water management pond and the exploratory decline.
- 119 Following ERA's completion of Stage 1 development in 1999, the 17-hectare development site was placed on standby and environmental care and maintenance to facilitate further community discussion on the project.
- 120 In 2000, a new resource for Jabiluka 2 was calculated based on an updated geological model. The results of the underground drilling and mapping of underground exposures were the basis of a new model for the Jabiluka mineralisation, and a resource of approximately 156,000 tonnes U₃O₈ (Measured, Indicated & Inferred was calculated – Hellman & Schofield, 2000) was defined.
- 121 Since then, ERA has stated that there will be no further development at Jabiluka without the support of the Mirarr Traditional Owners through their representatives, the NLC.

Renewal Decision and Federal Court proceedings

122 The original MLN1 was due to expire in August 2024 after its 42 year term. On 20 March 2024, ERA announced that it had applied for its renewal. The relevant clause of MLN1 reads as follows:

“2. *The Territory covenants with the lessees that, provided the lessees have complied with the Mining Act and the conditions to which this lease is subject, the Minister at the expiration of this lease and in accordance with that Act will renew this lease for a further term not exceeding ten (10) years.*”⁵⁷

123 On 26 July 2024, ERA announced that the NT Government had advised that, based on advice from the Commonwealth Government, MLN1 would not be renewed⁵⁸. Subsequently, on 6 August 2024⁵⁹, ERA announced that it had commenced proceedings in the Federal Court of Australia against (collectively the Respondents):

- (a) the Commonwealth Minister for Resources and Minister for Northern Australia
- (b) the Commonwealth of Australia
- (c) the NT Minister for Mining and Minister for Agribusiness and Fisheries
- (d) the NT, and
- (e) the Jabiluka Aboriginal Land Trust⁶⁰,

seeking judicial review of the Renewal Decision, including of the Commonwealth Government’s advice to the NT Government to refuse the renewal of MLN1⁶¹. ERA also sought an interlocutory injunction to stay the Renewal Decision and its enforcement or execution.

124 On 9 August 2024, ERA announced that the Federal Court of Australia had made an interim order to stay the Renewal Decision, the effect of that decision and its enforcement or execution pending further order of the Court⁶². It is common ground amongst the parties that as a result of the interim stay order, MLN1 remains in effect pursuant to s68 of the *Mineral Titles Act 2010* (NT), pending the determination of the proceeding⁶³.

⁵⁷ Mining Lease MLN1, Clause 1.2.

⁵⁸ Source: ERA announcement *Jabiluka Lease renewal update* 26 July 2024.

⁵⁹ Source: ERA announcement *ERA Commences legal proceedings* dated 6 August 2024.

⁶⁰ Subsequently, the NLC and Ms Yvonne Margarula, an elder of the Mirarr Traditional Owners, were added as respondents.

⁶¹ LEA notes that the Reasons for Judgement delivered by the Federal Court of Australia documents the relief sought as comprising “*an order setting aside the non-renewal decision (or a declaration that it is invalid), a declaration that the advice was beyond power and invalid, an injunction restraining the giving of advice by the Commonwealth Minister for the purposes of s. 187(1) until natural justice has been afforded to ERA, and a declaration that the lease remains in force.*” Source: Order of Justice Kennett, NSD 1056 of 2024 dated 22 October 2024.

⁶² Source: ERA announcement *Update on legal proceedings* dated 9 August 2024.

⁶³ Source: Interlocutory Application, NSD 1056 of 2024 filed 9 October 2024.

125 On 28 October 2024, the First and Second Respondents gave notice that the proceeding involved a matter arising under the Australian Constitution or involving its interpretation within the meaning of s78B of the *Judiciary Act 1903* (Cth)⁶⁴.

126 On 8 November 2024, the matter was listed for hearing beginning 12 May 2025⁶⁵.

Resource and carrying value

127 Rio Tinto noted in its 2022 Annual Report that based on its assessment the deposit does not have reasonable prospects of eventual economic extraction, as required under the JORC Code for reporting of a mineral resource, and given the Mirarr Traditional Owners' publicly stated opposition to further mining and the operation of ERA's Long Term Care and Maintenance Agreement, Rio Tinto had therefore decided to no longer report a mineral resource for Jabiluka⁶⁶.

128 In the ERA Annual Report 2024, ERA stated that in line with the requirements of the JORC Code (2012), ERA has assessed the reasonable prospects for eventual economic extraction (RPEEE) for Jabiluka and that:

“(d)ue to the non-renewal decision of the associated lease – currently subject to legal proceedings – , the Mirarr people’s publicly stated opposition to further mining and the operation of ERA’s Long Term Care and Maintenance Agreement, the Competent Person has determined that Jabiluka no longer meets the criteria for reporting as a Mineral Resource. As a result, the Company will no longer include Jabiluka in its reported Mineral Resources. ERA will continue to monitor developments, including the outcome of legal proceedings, and will reassess if there are any material changes in circumstances”⁶⁷.

129 The previous reported resource for Jabiluka (at 31 December 2023) is summarised in the table following:

Mineral resources – Jabiluka – as at 31 December 2023			
	Mt	%U ₃ O ₈	T U ₃ O ₈
Measured	1.21	0.89	10,800
Indicated	13.88	0.52	72,200
Sub-total Measured and Indicated	15.09	0.55	82,900
Inferred resources	10.00	0.54	54,000
Total resources	25.10	0.55	137,100⁽¹⁾

Note:

1 Approximately 302.3 Mlb.

Source: ERA Annual Report 2023.

130 Prior to 2018, ERA recognised the investment in Jabiluka – long term care and maintenance and development project – at some \$203.6 million as part of “Undeveloped properties” (refer paragraphs 138 and 140(e)). In June 2018, following a significant reduction in long term uranium price forecasts and an increase in the asset specific discount rate, ERA wrote down

⁶⁴ Source: *Notice of a Constitutional matter under section 78B of the Judiciary Act 1903*, NSD 1056 of 2024 filed 25 October 2024.

⁶⁵ Source: Order of Justice Kennett, NSD 1056 of 2024 dated 8 November 2024.

⁶⁶ Source: Rio Tinto Annual Report 2022.

⁶⁷ Source: ERA Annual Report 2024.

(impaired) the carrying value of the Jabiluka Undeveloped Property within its financial statements to \$89.9 million⁶⁸.

- 131 For accounting purposes, ERA fully impaired MLN1 at 30 June 2024 as a result of the Renewal Decision⁶⁹. In the financial report for the half year to 30 June 2024, ERA noted:

“This accounting treatment does not preclude or influence the company's legal rights or actions regarding the lease. Even if ERA is successful in securing a renewal of the Jabiluka Mineral Lease, whether following the Court proceedings referred to above or otherwise, in accordance with the Long-Term Care and Maintenance Agreement signed by ERA in 2005, the Jabiluka deposit will not be developed by ERA without the approval of the Mirarr Traditional Owners, and this and other factors may materially affect its value as referred to in earlier ERA financial statements.”⁷⁰

Boss Energy’s non-binding indicative offer

- 132 On 29 July 2024, ERA confirmed that ERA had received a non-binding indicative offer from Boss Energy Limited (Boss Energy) to buy MLN1 for \$550 million, subject to conditions including:

- (a) due diligence (including Boss Energy being satisfied with the status of MLN1) and
- (b) relevant regulatory and third party approvals, including Ministerial and NLC approvals⁷¹.

- 133 ERA noted that the proposal involved a number of features including a 10% free carried interest (post recovery of capital) in favour a NT-focused Indigenous foundation to support Indigenous communities.

- 134 ERA initially stated that discussions were in initial stages, but the Company had subsequently received notice on 28 July 2024 that Boss Energy had withdrawn its proposal given the Renewal Decision⁷².

Other

- 135 In addition to the tenures relating to the Ranger Project Area and MLN1, ERA has two exploration licence applications (ELA23311 and ELA23312) for the Cooper Creek JV, located to the north of and outside of the Kakadu National Park. Both ELAs are currently in moratorium pending further discussions with the Traditional Owners.

⁶⁸ Source: ERA Annual Report 2018.

⁶⁹ Source: ERA announcement *Interim Report* 30 June 2024.

⁷⁰ Source: ERA announcement *Interim Report* 30 June 2024.

⁷¹ LEA notes that Boss Energy described this in the following terms: *“The non-binding offer, which was put to Jabiluka’s leaseholder ERA, contained several key conditions precedent. These included that any transaction involving Boss would have the full support and approval of the Mirarr Traditional Owners, the Northern Land Council, relevant regulatory bodies and the Federal Government. The offer was also subject to satisfactory due diligence being completed by Boss (including being satisfied with the Jabiluka mining lease).”* Source: Boss Energy ASX Release 29 July 2024.

⁷² Source: ERA announcement *Response to media speculation* 29 July 2024.

Financial performance

136 The financial performance of ERA for the four years ended 31 December 2024 is summarised in the table following:

ERA – summarised statement of financial performance ⁽¹⁾				
	2021	2022	2023	2024
	Audited	Audited	Audited	Audited
	\$m	\$m	\$m	\$m
Revenue from continuing operations	201.0	55.3	34.2	37.2
Cost of U ₃ O ₈ sales / change in inventories	(119.7)	(22.5)	-	-
Materials and consumables used	(1.6)	(0.2)	(1.1)	(0.5)
Employee benefits and contractor expenses	(21.8)	(15.9)	(12.0)	(7.6)
Government and other royalties	(9.9)	(1.9)	-	-
Commission and shipping expenses	(2.6)	(0.1)	-	-
Depreciation and amortisation expenses	(0.4)	(0.3)	(0.3)	(0.3)
Non cash impairment charge	-	-	-	(89.9)
Changes in estimate of rehabilitation provision	(668.1)	(62.2)	(1,349.3)	(69.1)
Financing costs	(19.5)	(106.5)	(57.3)	(110.6)
Statutory and corporate expenses	(4.2)	(6.0)	(2.3)	(5.2)
Other expenses	(0.6)	(0.2)	(0.0)	(0.1)
Profit / (loss) before income tax	(647.4)	(160.6)	(1,388.1)	(246.0)
Income tax (expense)/benefit	(2.8)	-	-	-
Profit / (loss) for the year	(650.2)	(160.6)	(1,388.1)	(246.0)

Note:

1 Rounding differences may exist.

Source: ERA Annual Report 2022; ERA Annual Report 2023; ERA Annual Report 2024.

137 The principal activities of ERA during the course of the above periods were focused almost entirely upon the rehabilitation of Ranger Project Area. Accordingly, the Company generated very little revenue and incurred a number of significant costs. In particular, we note that:

- (a) **revenue** – sales of U₃O₈ ceased in 2022 and revenue recognised subsequent to that date principally comprises interest received or receivable, asset sales and gains on forward contracts:

ERA – revenue ⁽¹⁾				
	2021	2022	2023	2024
	Audited	Audited	Audited	Audited
	\$m	\$m	\$m	\$m
Sales of U ₃ O ₈	190.3	35.6	-	-
Interest received / receivable	1.9	9.3	32.2	36.3
Rent received ⁽²⁾	0.9	0.8	0.5	0.4
Asset sales and recoveries	0.4	2.9	1.4	0.5
Net gain on forward contracts	7.4	6.8	-	-
Total revenue	201.0	55.3	34.2	37.2

Note:

1 Rounding differences may exist.

2 Rent received includes rent from properties in Jabiru village and from the Jabiru airport.

Source: ERA Annual Report 2022; ERA Annual Report 2023; ERA Annual Report 2024.

- (b) **Government and other royalties** – represent royalties paid to the Commonwealth and Indigenous interests based upon a percentage of Ranger’s net sales revenue
- (c) **depreciation and amortisation** – represents depreciation / amortisation associated with ERA’s right of use (ROU) assets. The Ranger cash generating unit was fully impaired in 2016. Since then, all capital expenditure has been immediately written off and recorded in “Other expenses”
- (d) **non-cash impairment charge** – the impairment charge recognised on ERA’s investment in MLN1 (relating to Jabiluka and reflected in the ERA balance sheet as Undeveloped Properties), which was written down to \$nil as at 30 June 2024 as a result of the Renewal Decision⁷³
- (e) **change in estimate of rehabilitation provision** – relates to the rehabilitation provision recognised in relation to Ranger Project Area. The carrying values and movements therein are set out at paragraph 140(j)
- (f) **financing costs** – ERA had no interest bearing debt during the period reviewed. The financing costs recognised predominantly reflect the unwinding of the discount on rehabilitation provisions (refer paragraph 140(j)), with a small amount relating to bank guarantee fees
- (g) **statutory and corporate expenses** – statutory and corporate costs principally relate to audit and legal fees, insurances and share registry / listing costs.

Financial position

138 The financial position of ERA as at 31 December 2023, 30 June 2024 and 31 December 2024 is summarised in the following table:

ERA – summarised statement of financial position ⁽¹⁾			
	31 Dec 23	30 Jun 24	31 Dec 24
	Audited	Reviewed	Audited
	\$m	\$m	\$m
Cash and cash equivalents	217.0	127.8	791.3
Trade and other receivables	4.2	2.7	9.1
Inventories	7.3	7.9	7.3
Prepayments	0.8	1.2	1.9
Undeveloped properties	89.9	-	-
ROU assets ⁽²⁾	0.7	0.5	0.4
Cooper Creek JV	-	-	-
Property, plant and equipment (PP&E)	-	-	-
Government security receivable	509.0	522.0	535.1
Total assets	828.8	662.2	1,345.1
Trade and other payables	25.9	23.7	26.7
Lease liabilities (associated with ROU assets)	0.7	0.3	0.4
Provision for employee benefits	9.6	9.4	9.9
Provision for rehabilitation	2,420.0	2,402.3	2,422.8
Total liabilities	2,456.1	2,435.9	2,459.7
Net assets / (deficit)	(1,627.3)	(1,773.7)	(1,114.6)

⁷³ Refer paragraph 130.

Note:

- 1 Rounding differences may exist.
- 2 Being the ERA Darwin office.

Source: ERA Annual Report 2023; ERA announcement *Interim Report* 30 June 2024; ERA Annual Report 2024.

139 LEA notes that as at 31 December 2024, ERA was in a net liability position (a deficiency of capital and reserves) of some \$1.1 billion. This net deficiency position reduced from some \$1.8 billion at 30 June 2024 principally due to the receipt of the net proceeds from the 2024 Entitlement Offer. Since 2018, ERA has reported a net liability position and have noted that there is a material uncertainty that may cast significant doubt on ERA's ability to continue as a going concern and therefore, that ERA may not be able to realise its assets and discharge its liabilities in the normal course of business. ERA have further noted that should additional funding support from its shareholders not occur, ERA would likely have insufficient cash on hand to continue its current rehabilitation and other activities within the foreseeable future. However, ERA's directors have stated they believe that ERA will be successful in obtaining additional funding support from its shareholders and that the rehabilitation security requirements will be covered by a mix of cash on deposit, bank guarantees and funding from shareholders and, as a result, ERA's financial statements have been prepared on a going concern basis.

140 In respect of the above statement of financial position:

- (a) **cash and cash equivalents** – cash increased materially in the period to 31 December 2024 as a result of the 2024 Entitlement Offer (refer paragraph 150)
- (b) **trade and other receivables** – includes trade debtors, amounts due from related parties and other debtors as set out below. Other debtors principally comprises accrued interest, with the remainder comprising transactions outside the usual operating activities of the Company and are predominately concerned with receipts from employees and businesses operating within the Jabiru township:

ERA – trade and other receivables⁽¹⁾			
	31 Dec 23	30 Jun 24	31 Dec 24
	Audited	Reviewed	Audited
	\$000	\$000	\$000
Trade debtors	2,728	1,894	2,908
Amounts due from related parties	20	39	17
Other debtors	1,481	815	6,171 ²
Total	4,229	2,749	9,096

Note:

- 1 Rounding differences may exist.
- 2 December 2024 balance includes \$3.3 million of accrued interest.

Source: ERA Annual Report 2023; ERA management accounts (June 2024), ERA Annual Report 2024.

- (c) **inventories** – represent stores and spare parts, which are carried on balance sheet at the lower of cost or net realisable value
- (d) **prepayments** – represent prepayments for items such as Ranger rent, council rates and insurance

- (e) **Undeveloped Properties** – ERA’s investment in MLN1 (relating to Jabiluka), the carrying value of which was written down to \$nil as at 30 June 2024 as a result of the Renewal Decision⁷⁴ (refer paragraph 131 above). Prior to this, the carrying value of this asset was written down by some \$114 million (from some \$204 million) in 2018⁷⁵
- (f) **Cooper Creek JV** – no net material value is recognised for the exploration licence applications ELA23311 and ELA23312
- (g) **PP&E** – ERA’s PP&E was fully depreciated at each balance sheet date:

ERA – PP&E⁽¹⁾			
	31 Dec 23	30 Jun 24	31 Dec 24
	Audited	Reviewed	Audited
	\$m	\$m	\$m
Mine land and buildings (cost)	110.8	110.8	110.8
Less accumulated depreciation	(110.8)	(110.8)	(110.8)
Net book amount	-	-	-
Plant and equipment (cost)	1,179.9	1,179.9	1,179.9
Less accumulated depreciation	(1,179.9)	(1,179.9)	(1,179.9)
Net book amount	-	-	-
Mine properties (cost)	421.7	421.7	421.7
Less accumulated depreciation	(421.7)	(421.7)	(421.7)
Net book amount	-	-	-
Rehabilitation (cost)	342.3	342.3	342.3
Less accumulated depreciation	(342.3)	(342.3)	(342.3)
Net book amount	-	-	-
Total net book amount	-	-	-

Note:

1 Rounding differences may exist.

2 No further assets have been added to the register subsequent to 31 December 2023.

Source: ERA Annual Report 2023, ERA management accounts (June 2024) ERA Annual Report 2024.

- (h) **right of use asset** – the right of use asset represents rented Darwin office space
- (i) **government security receivable** – represents the monies held on trust with DISR (\$535 million as at 31 December 2024) which are intended to provide security against the estimated immediate costs of closing and rehabilitating the Ranger Project Area, plus additional bank guarantees (of \$126 million as at 31 December 2024) (refer paragraph 109)
- (j) **provision for rehabilitation** – relates to the Ranger Project Area rehabilitation obligations. A history of the accounting rehabilitation provision and movements in the non-current provision since 2018 is summarised in the table below:

⁷⁴ Refer paragraph 130.

⁷⁵ The \$204 million figure comprised the cost of acquisition of MLN1 plus exploration and evaluation expenditure incurred. The last material addition to the carrying value was in 2001.

ERA – rehabilitation provision ⁽¹⁾							
	Year ended 31 December						
	2018	2019	2020	2021	2022	2023	2024
	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Current	92	123	163	223	269	300	258
Non-current ⁽²⁾⁽³⁾	739	647	555	1,028	956	2,120	2,165
Total	830	770	718	1,251	1,225	2,420	2,423
Govt security receivable ⁽³⁾	-	-	533	535	486	509	535
Investment in trust fund	75	76	-	-	-	-	-

Note:

1 Rounding differences may exist.

2 Movements in non-current rehabilitation provision comprise:

Change in estimate	343	-	(3)	668	62	1,363	120
Change in discount rate	-	-	9	-	-	(13)	(51)
Unwinding of discount	20	33	24	19	106	57	110
Transfer to current provision	(79)	(124)	(122)	(214)	(240)	(242)	(134)
Total movement	284	(92)	(91)	473	(72)	1,164	45

3 Real discount rates applied: 2018-2019: 2.0%, 2020 – 2022: 1.5%, 2023 – 2%; 30 June 2024: 2.5%.

Source: ERA Annual Reports 2018 – 2023, ERA Annual Report 2024.

The change in the estimates over the period reviewed is principally attributable to:

- (i) 2018 – costs associated with tailings transfer to Pit 3, additional water treatment and related infrastructure, and revegetation requirements; higher forecast costs relating to site services and owners' costs; and an increase in contingency
 - (ii) 2021 – additional water treatment and land forming costs, overruns in the conversion of the tailings storage facility to a water storage facility and costs associated with a revision to the Pit 3 capping methodology
 - (iii) 2023 – an extension in schedule to achievement of final landform, with the extension primarily due to a reassessment of the time taken to achieve Pit 3 consolidation, with a secondary driver being the transition to lower technical risk Pit 3 capping methods, removing previously estimated schedule synergies, plus increased estimates in water volumes requiring treatment and the long term performance of the water treatment plant being below the planned performance⁷⁶
 - (iv) 2024 – principally due to updated actual water volumes in the Ranger Water Dam that differed from previous forecasts, delays in the commissioning of the processes to treat process water through the existing brine squeezer and the commencement of Pit 3 initial capping⁷⁷
- (k) **trade and other payables** – include trade payables, amounts due to related parties and other payables as set out below:

⁷⁶ Source: ERA Annual Report 2023.

⁷⁷ Source: ERA Annual Report 2024.

ERA – trade and other payables ⁽¹⁾			
	31 Dec 23	30 Jun 24	31 Dec 24
	Audited	Reviewed	Audited
	\$000	\$000	\$000
Trade payables	24,637	22,640	25,211
Amounts due to related parties	838	490	1,025
Other payables	424	541	436
Total	25,899	23,671	26,672

Note:

1 Rounding differences may exist.

Source: ERA Annual Report 2023; ERA management accounts (June 2024), ERA Annual Report 2024.

- (l) **provision for employee benefits** – represents employee annual leave and long service leave entitlements as well as a provision for benefits payable on termination of employment:

ERA – employee provisions ⁽¹⁾			
	31 Dec 23	30 Jun 24	31 Dec 24
	Audited	Reviewed	Audited
	\$m	\$m	\$m
Current – annual and long service leave	7.1	8.3	9.0
Current – termination of employment	1.1	0.4	0.2
Non-current	0.8	0.7	0.7
Total	9.6	9.4	9.9

Note:

1 Rounding differences may exist.

Source: ERA Annual Report 2023; ERA announcement *Interim report* 30 June 2024; ERA Annual Report 2024.

- (m) **contingent liabilities** – within ERA’s financial statements, ERA disclosed a contingency relating to an unresolved legal action commenced (in 1999) by the Mirarr Traditional Owners in the Federal Court against the former Commonwealth Minister for Resources and ERA, claiming that due process was not followed in granting approvals for the Jabiluka mill alternative. ERA disclosed the matter as dormant, and that ERA does not expect any material losses in respect of this legal dispute.

Tax losses

- 141 As at 31 December 2024, ERA had carry forward tax losses of some \$366 million (30 June 2024: \$343 million) at 30%.

Share capital and performance

- 142 ERA has 405.4 billion fully paid ordinary / “A Class” shares (and no other securities) on issue⁷⁸, noting that the Company has raised a considerable amount of equity in recent years to fund rehabilitation obligations for the Ranger Project Area:

⁷⁸ Source: ERA *Appendix 2A – Application for quotation of securities* 21 November 2021; ERA Annual Report 2024.

ERA – movement in ordinary / “A Class” shares on issue

Equity issue and issue date	Shares (million)
As at 31 December 2019	517.7
2019 entitlement offer at \$0.15 per share (completed in February 2020)	3,173.7
2023 interim entitlement offer at \$0.02 per share (completed in May 2023)	18,456.9
2024 entitlement offer at \$0.002 per share (completed November 2024)	383,247.9
Total shares on issue	405,396.2

Source: ERA Annual Reports 2021 – 2023; ERA Annual Report 2024.

Entitlement offers

143 A summary of the entitlement offers undertaken by ERA is set out in the following table:

ERA – entitlement offers⁽¹⁾

Offer	Offer price cents	5-day VWAP ⁽²⁾ cents	Discount to 5-day VWAP %	Shares issued billion	Amount raised (before costs) \$m
2019 entitlement offer	15.0	24.6	39.0	3.2	476.0
2023 interim entitlement offer	2.0	20.3	90.2	18.5	369.0
2024 entitlement offer	0.2	1.6 ⁽³⁾	87.8	383.2	766.5

Note:

- 1 Rounding differences may exist.
- 2 Volume weighted average price (VWAP) based on unadjusted share prices.
- 3 Calculated over the trading period to 23 August 2024 (noting ERA entered a trading halt before the market opened on 26 August 2024).

Source: ERA *Capital Raising Presentation* 15 November 2019; ERA *Capital Raising Presentation (for Interim Entitlement Offer)* 4 April 2023; ERA, *Capital Raising Presentation (for Entitlement Offer)*, 29 August 2024.

144 Further detail on each of the capital raises follows.

2019 entitlement offer

145 On 15 November 2019, ERA announced a fully underwritten 6.13-for-1 pro-rata renounceable entitlement offer priced at \$0.15 per share to raise approximately \$476 million (before costs), with the proceeds used to fund its rehabilitation obligations for the Ranger Project Area. In addition, given the inability of ERA to secure third party underwriting support, Rio Tinto acted as an underwriter through its wholly owned subsidiary North Limited.

146 ERA announced the completion of the offer on 20 February 2020, with 3.2 billion new shares issued for \$376.7 million, with the shortfall of \$99.3 million covered by Rio Tinto. As a result of the entitlement offer, Rio Tinto’s interest in ERA increased from 68.4% to 86.3%.

2023 Interim Entitlement Offer

147 On 24 June 2022, ERA announced it engaged with its three largest shareholders (Rio Tinto, Packer & Co Ltd (Packer & Co) and Zentree Investments Ltd (Zentree)) in relation to a proposed non-underwritten, renounceable entitlement offer which aimed to raise approximately \$300 million (at a 10% to 15% discount to the prevailing share price) (the 2023 Interim Entitlement Offer). The capital was required to continue the planned Ranger

Project Area rehabilitation works until the end of 2023. However, ERA's three largest shareholders provided no pre-commitments to subscribe for entitlements on the proposed terms and as such ERA delayed the launch of the offer.

- 148 On 4 April 2023, ERA announced a 5-for-1 non-underwritten pro-rata renounceable entitlement offer to raise \$369 million as an interim funding solution for ERA to repay the Rio Tinto credit facility⁷⁹ and fund the planned rehabilitation activities of the Ranger Project Area until the end of 2Q24, with further funding expected to be required in 2024 for remaining rehabilitation expenditure. The \$0.02 offer price was the only price at which ERA obtained pre-commitments such that the minimum necessary funds required could be raised, with its three largest shareholders committing to subscribe for \$355 million in total.
- 149 ERA announced the completion of the offer on 9 May 2023, with approximately 18.2 billion shares issued for \$363.6 million and a further 275.8 million shares issued under a shortfall facility⁸⁰ to raise a total of approximately \$369 million (before costs). Rio Tinto's interest in ERA remained constant at 86.3%.

2024 Entitlement Offer

- 150 On 29 August 2024, ERA announced a 19.87-for-1 non-underwritten pro-rata renounceable entitlement offer to raise up to approximately \$880 million at an offer price of \$0.002 per share, with net proceeds used to fund planned Ranger Project Area rehabilitation related expenditure up until 3Q27 (the 2024 Entitlement Offer). Rio Tinto, through its 100% owned subsidiaries North Limited and Peko-Wallsend, committed to subscribe for their respective pro-rata entitlements (in aggregate, 379.9 billion shares) at a cost of approximately \$760 million. Rio Tinto stated (on 29 August 2024) that if its interest in ERA increased to 90% or more as a result of the 2024 Entitlement Offer, then it intended to proceed with the compulsory acquisition of all remaining ERA shares at an offer price of \$0.002 per share⁸¹.
- 151 On 18 November 2024, ERA announced that shareholders applied for some 383.1 billion shares (out of a maximum of 440.1 billion), raising some \$766.1 million (before costs). A further 181.4 million shares were issued to certain shareholders (not including Rio Tinto) under a shortfall facility⁸², resulting in the issue of a total of 383.2 billion shares for total proceeds of \$766.5 million (before costs).

⁷⁹ On 29 April 2016, ERA entered into a \$100 million loan agreement with Rio Tinto to support its rehabilitation obligations if additional funding were required. The agreement was amended on 6 October 2022 and the maturity date was extended to 31 March 2023 (unless additional funds were raised beforehand, or Rio Tinto further extended the maturity date). This provided ERA with additional time to implement a funding solution and offer assurances to its stakeholders that the Ranger Project Area rehabilitation would continue to be funded. ERA announced on 27 March 2023 that it had submitted notices to draw down the full \$100 million, while it continued to explore an interim funding solution for the Ranger Project Area rehabilitation. The loan was fully repaid from the proceeds of the 2023 interim entitlement offer.

⁸⁰ Eligible shareholders other than Rio Tinto were allowed to participate.

⁸¹ Source: ERA announcement *Capital Raising Presentation (for Entitlement Offer)* dated 29 August 2024.

⁸² 57.0 billion shares were offered for sale under the shortfall bookbuild, but no bids were received for the shortfall shares at, or above, the offer price.

152 ERA shareholders, other than Rio Tinto, applied for only 3.3 billion shares out of a maximum of 60.2 billion (an application rate of only 5.5%⁸³). As a result, Rio Tinto increased its interest in ERA (from 86.3%) to approximately 98.4%.

Substantial shareholders

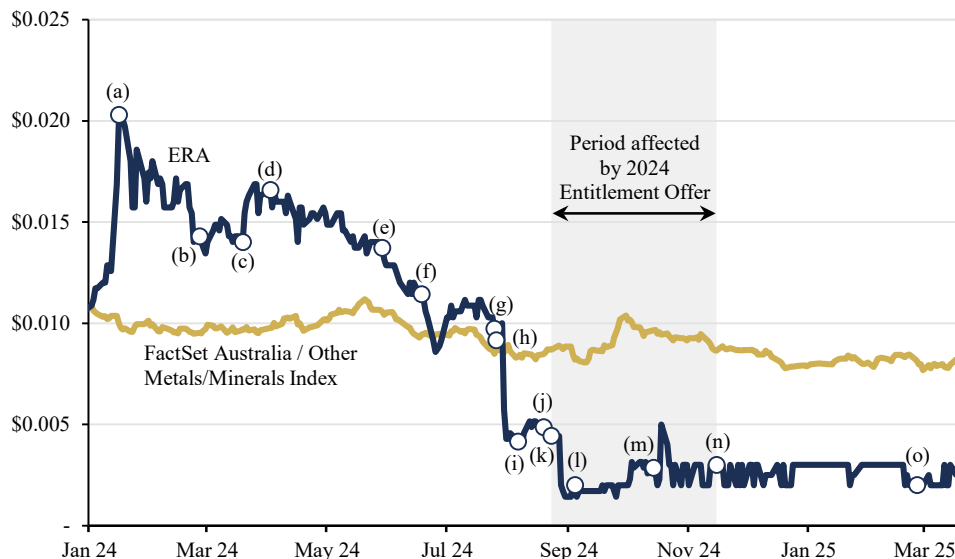
153 As at the date of this report, Rio Tinto (via its wholly owned subsidiaries North Limited and Peko-Wallsend) is the only substantial shareholder in ERA, owning 399.0 billion shares for a 98.4% interest.

154 Other significant shareholders include, Packer & Co and Zentree with estimated holdings of 0.65% and 0.31% respectively.

Share price performance

155 The following chart illustrates the movement in the share price of ERA from 1 January 2024 to 21 March 2025:

ERA – share price history⁽¹⁾
1 January 2024 to 21 March 2025



Note:

1 Based on closing prices. The FactSet Australia / Other Metals/Minerals Index has been rebased to ERA's last traded price on 1 January 2024, being \$0.011.

Source: FactSet and LEA analysis.

156 We note the following in respect of the material movements in the share price of ERA above:

- (a) **16 January 2024** – ERA responded to an ASX price query after a substantial increase in the share price, stating there were no known, non-public, explanations for the increase and suggesting it could be attributed to the recent rise in uranium prices

⁸³ Total maximum number of shares to be issued under the offer of 440.1 billion, less the 379.9 billion issued to Rio Tinto (which took up its full entitlement) equals 60.2 billion shares available for other shareholders, of which 3.3 billion were taken up (total 383.2 billion shares issued less the 379.9 billion issued to Rio Tinto).

- (b) **27 February 2024** – released FY23 financial results, reporting a net loss of \$1.4 billion due to higher rehabilitation provisions relating to the Ranger Project Area. Additionally, ERA announced that an entitlement offer was expected in the 2H24
- (c) **20 March 2024** – lodged an application for the renewal of MLN1, which includes a Long Term Care and Maintenance Agreement with the Mirarr Traditional Owners, granting them veto power over the development of the uranium deposits
- (d) **3 April 2024** – appointed Rio Tinto to manage the Ranger Project Area rehabilitation project under the MSA
- (e) **30 May 2024** – Zentree submitted an application to the Takeovers Panel in protest of an anticipated ERA entitlement offer, alleging amongst other concerns, that Rio Tinto effectively controlled ERA’s business and fettered the discretion of the ERA board, there was an information asymmetry regarding the rehabilitation costs for the Ranger rehabilitation project and while majority shareholder Rio Tinto (at that time holding an interest of 86.3%) had access to undisclosed information through the MSA, minority shareholders did not enjoy the same levels of visibility
- (f) **19 June 2024** – the Takeovers Panel declined to conduct proceedings in response to application submitted by Zentree citing that the proposal was premature as the capital raising had not yet commenced and there was no certainty that unacceptable circumstances would arise
- (g) **26 July 2024** – based on advice from the Commonwealth Government, the NT Government decided not to extend / renew MLN1 (Renewal Decision)
- (h) **29 July 2024** – confirmed media speculation (from the prior day) that Boss Energy had put forward a non-binding indicative offer to purchase MLN1 for \$550 million, subject to conditions including due diligence (including Boss Energy being satisfied with the status of MLN1) and relevant regulatory and third party approvals, including Ministerial and NLC approvals, and noted that the offer was withdrawn subsequent to the Renewal Decision
- (i) **6 August 2024** – ERA commenced legal proceedings challenging the Renewal Decision
- (j) **20 August 2024** – released 1H24 financial results, reporting \$nil revenue from the sale of uranium and a net loss of \$146 million
- (k) **29 August 2024** – announced the 2024 Entitlement Offer. The offer represented an 87.8% discount to ERA’s five-day VWAP
- (l) **5 September 2024** – Zentree and Packer & Co submitted an application to the Takeovers Panel in protest of the proposed 2024 Entitlement Offer, claiming unacceptable circumstances on the basis that the offer was only designed to increase the voting power of Rio Tinto to 99.2% to allow it to compulsorily acquire the remaining shares in ERA
- (m) **15 October 2024** – the Takeovers Panel declined to make a declaration of unacceptable circumstances as announced on 24 September 2024 and in response to the application submitted by Zentree and Packer & Co on 5 September 2024 and confirmed this decision on review. The 2024 Entitlement Offer subsequently resumed
- (n) **18 November 2024** – the 2024 Entitlement Offer completed, raising \$766 million with the shares issued on 21 November 2024. Rio Tinto’s interest in ERA increased to 98.4%

- (o) **26 February 2024** – released preliminary FY25 results, reporting a net loss of \$246.0 million.

Liquidity in ERA shares

- 157 The liquidity in ERA shares based on trading on the ASX over the 12 month period prior to 21 March 2025 is set out below:

ERA – liquidity in shares						
Period	Start date	End date	No of shares	WANOS ⁽¹⁾	Implied level of liquidity	
			traded	outstanding	Period ⁽²⁾	Annual ⁽³⁾
			000s	000s	%	%
1 month	22 Feb 25	21 Mar 25	79,332	405,396,250	0.02	0.23
3 months	22 Dec 24	21 Mar 25	402,870	405,396,250	0.10	0.40
6 months	22 Sep 24	21 Mar 25	1,344,919	263,330,199	0.51	1.02
1 year	22 Mar 24	21 Mar 25	1,631,455	137,280,400	1.19	1.19

Note:

- 1 Weighted average number of shares outstanding (WANOS) during relevant period.
 2 Number of shares traded during the period divided by WANOS.
 3 Implied annualised figure based upon implied level of liquidity for the period.

Source: FactSet and LEA analysis.

- 158 As indicated in the table above, total share turnover (on an annualised basis) in ERA shares is extremely low (i.e. less than 2% of the total number of shares on issue). This reflects, inter alia, the low free float, noting that Rio Tinto has held over 86.3% of the shares on issue over this period.

IV Industry overview

Uranium overview⁸⁴

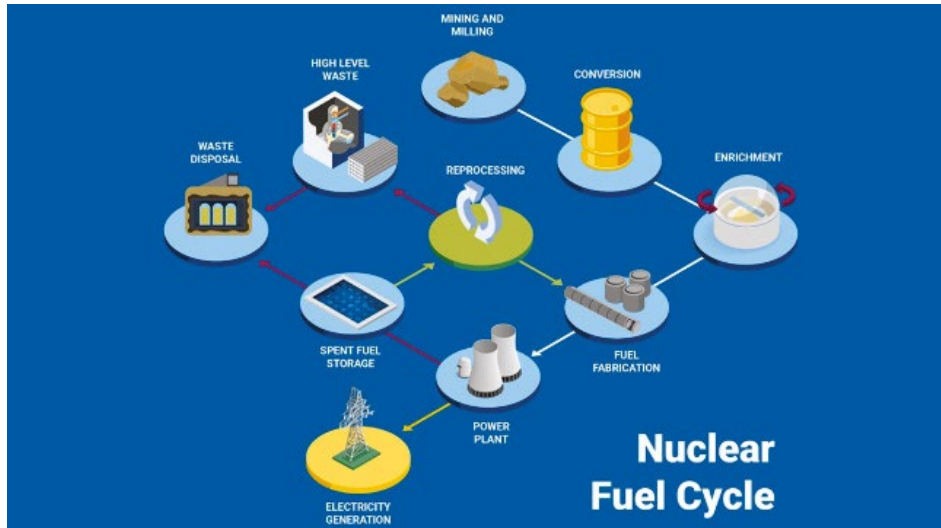
- 159 Uranium is a naturally occurring radioactive element, that is, an element that decays over time and releases energy. Its special properties make it a primary source of fuel in electricity generation. A chicken egg sized amount of uranium fuel in a nuclear reactor can generate as much electricity as 88 tonnes of coal.
- 160 Although it seems a very rare element, uranium is quite common (about 500 times more common than gold) and small amounts are present everywhere, in rock, soil, water etc.
- 161 Uranium ore can be mined through underground or open-cut methods. The mined ore is crushed, ground, and treated with acid to extract the uranium from the solution. Another method of retrieving uranium ore is in-situ leaching (ISL), also known as in-situ recovery, which involves dissolving uranium from an underground ore body and pumping it to the surface. Since the turn of the century, ISL has been the preferred method due to its environmental, safety and cost advantages, accounting for 56% of all uranium production in 2022. The product extracted in these mining and milling processes is uranium oxide concentrate (U₃O₈), more commonly referred to as “yellowcake”, which is sold as the refined form of uranium.
- 162 Like other elements, uranium occurs in several slightly differing forms, known as “isotopes”. Naturally occurring uranium is largely comprised of two isotopes: uranium-238 (²³⁸U) which is the most abundant, making up about 99.3%; and uranium-235 (²³⁵U), which represents the vast majority of the remaining 0.7%.
- 163 The production of energy in nuclear reactors is from the “fission” or splitting of the ²³⁵U atoms, a process which releases energy in the form of heat. ²³⁵U is the main fissile isotope of uranium (the ²³⁸U isotope does not contribute directly to the fission process, only indirectly by the formation of fissile isotopes of plutonium).
- 164 However, natural (mined) uranium only contains about 0.72% ²³⁵U. Since most reactors require a higher concentration of this isotope, the ²³⁵U level is artificially increased (from 0.7% to up to 94%) through a process called “enrichment”.⁸⁵
- 165 Uranium enrichment is strategically sensitive and capital intensive, creating significant barriers to entry for any new supplier. Hence, there are relatively few commercial enrichment suppliers operating a limited number of facilities worldwide.
- 166 Uranium is considered low-enriched if its isotopic proportion of ²³⁵U remains below 20%. Most commercial nuclear reactors use low-enriched uranium, or “reactor grade uranium” with less than 5% ²³⁵U, as a fuel. Low-enriched uranium does not deteriorate and can be safely stored for many years. If uranium is enriched beyond 20% ²³⁵U, it is considered highly

⁸⁴ This subsection is sourced from World Nuclear Association articles, *What is Uranium? How Does it Work?* (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/introduction/what-is-uranium-how-does-it-work>) and *Uranium Enrichment* (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/conversion-enrichment-and-fabrication/uranium-enrichment>) accessed on 24 January 2025, unless otherwise noted.

⁸⁵ International Atomic Energy Agency, *What is Uranium?*, accessed on 24 January 2025 (<https://www.iaea.org/newscenter/news/what-is-uranium>).

enriched. Uranium with such high isotopic proportions of ^{235}U is mostly used in naval propulsion reactors (for example in submarines), nuclear weapons and some research reactors.

Nuclear fuel cycle



Source: International Atomic Energy Agency, *What is Uranium?* accessed on 24 January 2025 (<https://www.iaea.org/newscenter/news/what-is-uranium>).

Global uranium industry

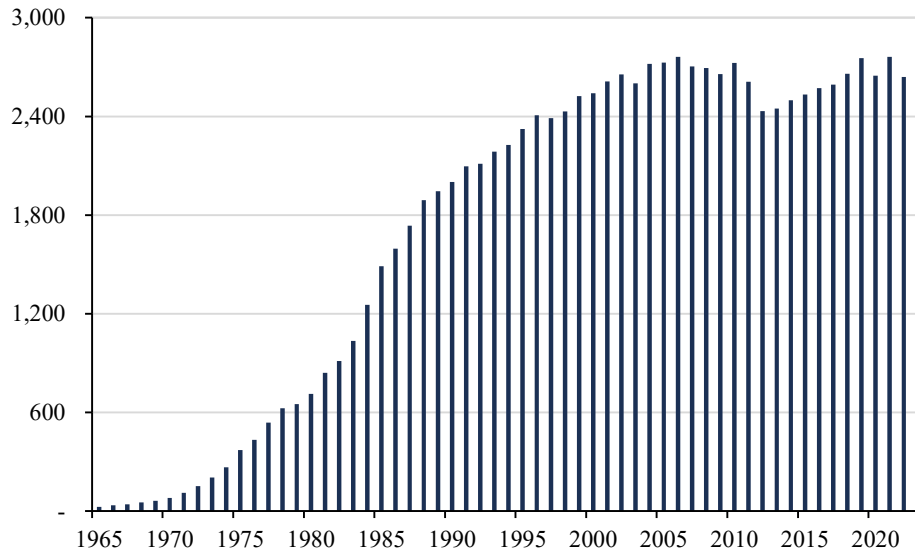
- 167 Uranium's only commercial use is as a fuel for producing nuclear power. Nuclear power currently accounts for almost 10% of global electricity generation, making it the second-largest source of low-emissions power after hydropower⁸⁶.
- 168 There are around 410 operational nuclear reactors in over 30 countries. Belgium, Bulgaria, Czech Republic, Finland, France, Hungary, Slovakia, Slovenia and Ukraine all source 30% or more of their electricity from nuclear reactors⁸⁷. The United States of America (US) has about 90 reactors operating, supplying some 20% of its electricity, while France generates about 70% of its electricity from nuclear reactors.⁸⁸

⁸⁶ International Energy Agency, *The Path to a New Era for Nuclear Energy*, accessed on 24 January 2025 (<https://www.iaea.org/reports/the-path-to-a-new-era-for-nuclear-energy/executive-summary>).

⁸⁷ World Nuclear Industry, *Status Report 2024*, dated September 2024 (<https://www.worldnuclearreport.org/IMG/pdf/wnisr2024-v2.pdf>).

⁸⁸ World Nuclear Association, *What is Uranium? How Does it Work?* accessed on 24 January 2025 (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/introduction/what-is-uranium-how-does-it-work>).

**Global nuclear power⁽¹⁾
Terawatt hours (TWh) generated**



Source: Our World in Data, *Nuclear Energy*, accessed on 24 January 2025 (<https://ourworldindata.org/nuclear-energy>).

- 169 Nuclear power was first commercialised by the US in the 1950s after rapid development of nuclear technologies in World War II. The International Atomic Energy Agency (IAEA) was established by the United Nations in the same decade to promote the peaceful use of nuclear power⁸⁹. Development of nuclear power plants surged between 1965 and 1990 as utility companies recognised the economic and environmental benefits of nuclear power. The number of nuclear reactors in operation over this same period increased from 15 to 245 and nuclear power generated increased from 25 TWh to 2,000 TWh⁹⁰.
- 170 Construction starts of nuclear reactors globally in a singular year peaked at 44 in 1975, up from 10 in 1965⁹¹, before declining as a result of the Three Mile Island accident in Pennsylvania, US in 1979 and the Chernobyl disaster of 1986 in Ukraine. Skepticism regarding the safety of nuclear power generation after these disasters resulted in 67 planned nuclear power plant builds being cancelled in the US alone⁹² from 1979 to 1988. Construction of new nuclear reactors subsequently slowed and the number of nuclear reactors in operation plateaued. Nuclear power consistently accounted for around 16%⁹³ of the world's electricity supply between 1986 and 2001.
- 171 Factors impacting the nuclear energy industry from around 2000 onwards included increased electrification, countries prioritising energy security, and mounting pressure to reduce carbon

⁸⁹ US Department of Energy, *The History of Nuclear Energy*, accessed 3 March 2025 (<https://www.energy.gov/ne/articles/history-nuclear-energy>).

⁹⁰ IAEA, *Nuclear Power Reactors in the World*, dated 2022 (<https://www.iaea.org/publications/15211/nuclear-power-reactors-in-the-world>).

⁹¹ The World Nuclear Industry, *Status Report 2024*, dated September 2024 (<https://www.worldnuclearreport.org/IMG/pdf/wnisr2024-v2.pdf>).

⁹² US Energy Information Administration, *Most U.S. nuclear power plants were built between 1970 and 1990*, dated 27 April 2007 (<https://www.eia.gov/todayinenergy/detail.php?id=30972>).

⁹³ IAEA Annual Report 2001, dated July 2002 (https://www.iaea.org/sites/default/files/anrep2001_full.pdf).

emissions⁹⁴. Emerging economies began investing heavily in nuclear reactor construction, particularly China, which has accounted for approximately 25% of reactors constructed since 2000 and almost half of all reactors currently under construction⁹⁵.

- 172 Nuclear power as a percentage of total electricity supply has gradually declined since 2001 as TWh generated has remained steady while total global electricity output has increased. Nuclear power was out of favour with most countries as safety and waste disposal concerns reappeared in the wake of the Fukushima disaster in Japan in 2011. The industry currently has the potential to experience further growth driven by increasing global electricity demand from traditional sectors (such as light industry) and emerging ones like electric vehicles, artificial intelligence and data centres⁹⁶.
- 173 As at 2023, total electricity consumption was expected to increase 2.8% per year until 2050⁹⁷. Supply uncertainty has evolved largely from growing geopolitical tensions resulting in reactor operators seeking nuclear fuel (primarily uranium) from suppliers whose values are aligned with their own⁹⁸.
- 174 Climate policies such as the 2015 Paris Agreement, coupled with increasing energy demand to facilitate emerging sectors (for example, those referenced in paragraph 172 above), are resulting in generally favourable market conditions for uranium with several companies forecasting an annual supply deficit by 2040 of approximately 120 Mlb U₃O₈ (base case) to 250 Mlb U₃O₈ (to meet Net Zero Nuclear targets)⁹⁹.
- 175 In that context, some 63 nuclear reactors are currently under construction, representing more than 70 gigawatts (GW) of capacity, one of the highest levels seen since 1990 – for context, there will be an estimated total operating capacity of 428 GW in 2025. In addition, over the last five years, decisions have been taken to extend the operating lifetimes of over 60 reactors worldwide, covering almost 15% of the total nuclear fleet¹⁰⁰.
- 176 Approximately two-thirds of the world’s uranium is sourced from mines in Kazakhstan, Canada and Australia.¹⁰¹

⁹⁴ World Nuclear Association, *Outline History of Nuclear Energy*, dated 29 August 2024 (<https://world-nuclear.org/information-library/current-and-future-generation/outline-history-of-nuclear-energy>).

⁹⁵ The World Nuclear Industry, *Status Report 2024*, dated September 2024 (<https://www.worldnuclearreport.org/IMG/pdf/wnisr2024-v2.pdf>).

⁹⁶ International Energy Agency, *The Path to a New Era for Nuclear Energy*, accessed on 24 January 2025 (<https://www.iea.org/reports/the-path-to-a-new-era-for-nuclear-energy/executive-summary>).

⁹⁷ IAEA, *Energy, Electricity and Nuclear Power Estimates for the Period up to 2050*, 2024 edition (https://www-pub.iaea.org/MTCD/Publications/PDF/RDS-1-44_web.pdf).

⁹⁸ Cameco Corporation (Cameco), *Supply & Demand*, accessed on 3 March 2025 (<https://www.cameco.com/invest/markets/supply-demand>).

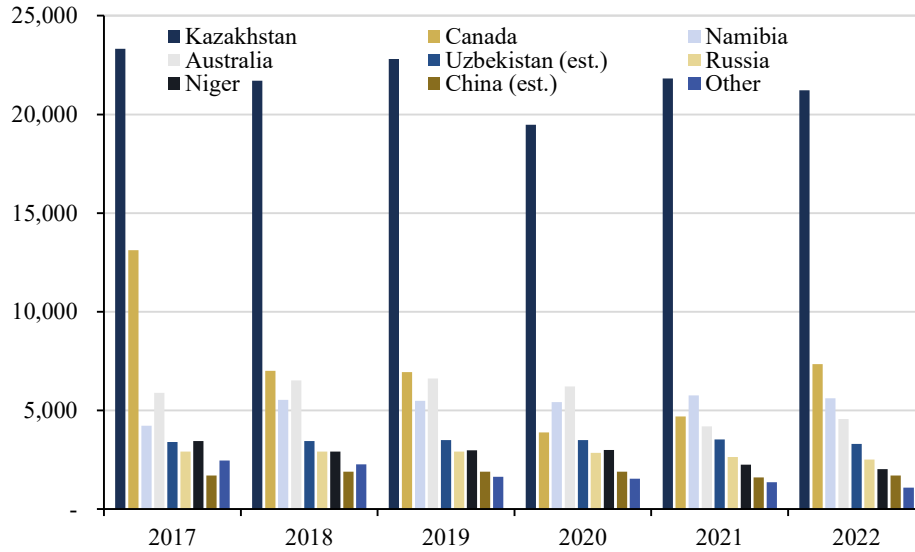
⁹⁹ NexGen Energy Ltd, *Sourcing the Energy Transition*, dated December 2024; Bannerman Energy Ltd, *Investor Presentation*, dated August 2024; Cameco Corporation, *Investor Presentation*, dated December 2024.

¹⁰⁰ International Energy Agency, *The Path to a New Era for Nuclear Energy*, accessed on 24 January 2025 (<https://www.iea.org/reports/the-path-to-a-new-era-for-nuclear-energy/executive-summary>).

¹⁰¹ World Nuclear Association, *World Uranium Mining Production*, accessed on 24 January 2025 (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/mining-of-uranium/world-uranium-mining-production>).

Uranium ore mined per country⁽¹⁾

Tonnes



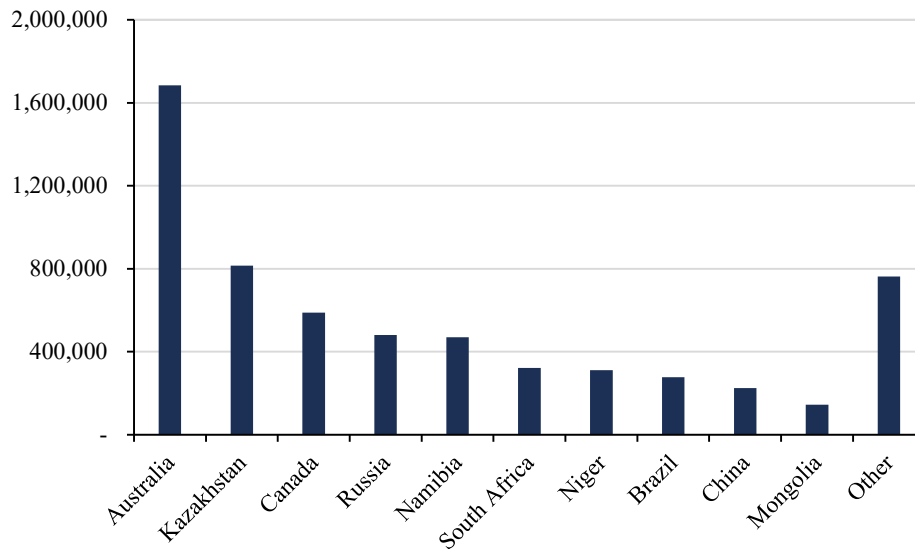
Source: World Nuclear Association, *What is Uranium? How Does it Work?* accessed on 24 January 2025 (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/introduction/what-is-uranium-how-does-it-work>).

Australia’s uranium industry

177 Australia is the world’s fourth largest producer of uranium (accounting for 9% of global production) and hosts the largest Economic Demonstrated Resources – some 1.684 Mt, approximately 28% of the world’s uranium resources¹⁰².

2021 uranium resources per country⁽¹⁾

Tonnes



¹⁰² DISR, *Resources and Energy Quarterly*, dated September 2024 (page 70).

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Note:

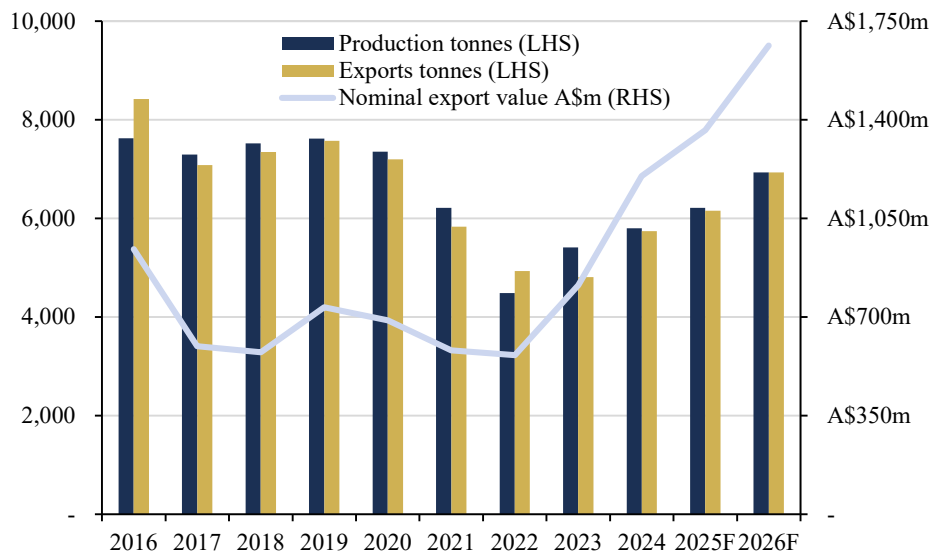
1 Uranium ore.

Source: World Nuclear Association, *What is Uranium? How Does it Work?* accessed on 24 January 2025 (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/introduction/what-is-uranium-how-does-it-work>).

178 Australia generated \$812 million in uranium export earnings in 2023 and \$1,200 million in 2024 and is expected to experience further growth of 12.1% in 2025 and 15.1% in 2026¹⁰³. All uranium produced in Australia is exported to 43 countries that have signed bilateral safeguard agreements ensuring Australian uranium is used solely for peaceful purposes and does not contribute to any military applications¹⁰⁴.

Australia's uranium production and exports⁽¹⁾

Tonnes U₃O₈



Note:

1 Average A\$ from declared net Free On-Board estimates.

Source: DISR, *Resources and Energy Quarterly*, dated December 2016 – December 2024.

Historical uranium mining in Australia

179 Australia commenced mining for uranium in 1954 in response to the evolution of nuclear weapons and civil power generation. Eventually, in an attempt to stem the proliferation of nuclear weapons development, the Australian Labor Party introduced a “Three Mines Policy” in 1983 to limit the number of operational uranium mines in Australia at any single point in time. The “Three Mines Policy” was abandoned by the Coalition Government in 1996,

¹⁰³ DISR, *Resources and Energy Quarterly*, dated September 2024 (page 73).

¹⁰⁴ Geoscience Australia, *Australia's Energy Commodity Resources 2024 – Uranium and Thorium*, dated 15 July 2024.

though State and Territory Governments still have the ability to implement their own regulations on mines within their jurisdiction¹⁰⁵.

180 Uranium mining remains a contentious issue in Australia primarily due to environmental and ethical concerns regarding uranium. See below a summary of the historically significant uranium mines in Australia:

- (a) **Radium Hill** – located in South Australia, this mine originally produced U_3O_8 as a by-product of radium in the 1930s before the South Australian Government recommissioned the underground mine in 1954 to supply U_3O_8 to the UK-US Combined Development Agency (CDA) for seven years until its closure in 1962. The CDA was the agency responsible for obtaining uranium for the United Kingdom (UK) and US nuclear weapons programs¹⁰⁶
- (b) **Rum Jungle** – this deposit was identified approximately 100 km south of Darwin in the NT in 1949. Operations began in 1954 as an underground and open-pit mine where U_3O_8 was sold to the CDA until 1963, after which stockpiled U_3O_8 mined up until 1971 was stored at the Australian Atomic Energy Commission's Lucas Heights facility and was later sold in 1995¹⁰⁷
- (c) **Mary Kathleen** – also in 1954 was the discovery of the Mary Kathleen rare earths and uranium deposit in Queensland. A uranium supply contract was signed with the United Kingdom Atomic Energy Authority (UKAEA) in 1956. Open-pit mining commenced in 1958 until it was closed in 1963 after the supply contract expired and attempts to find a buyer for the rare earths proved unsuccessful. The mine was closed for over a decade when new U_3O_8 supply contracts were negotiated with utilities in Japan, Germany and the US early in the 1970s and recommissioning began in 1974¹⁰⁸. The mine was depleted of U_3O_8 and subsequently closed in 1982
- (d) **South Alligator** – the first of the South Alligator mines, which eventually consisted of 13 uranium deposits¹⁰⁹, was discovered in 1953 in the Alligator Rivers Region of the NT. The mines were commissioned in 1959 and supplied U_3O_8 to the UKAEA until decommissioning in 1964
- (e) **Nabarlek** – the small, high grade Nabarlek deposit was discovered in 1970 on Arnhem Land in the NT. After four months of mining in 1979, the deposit was mined out and stockpiled U_3O_8 was sold to Japan, Finland, France, South Korea and the US for civil power generation until 1988¹¹⁰

¹⁰⁵ World Nuclear News, *Australian uranium policy moves on*, accessed on 23 January 2025 (<https://www.world-nuclear-news.org/Articles/Australian-uranium-policy-moves-on>).

¹⁰⁶ Australian Nuclear and Uranium Sites, *Radium Hill former uranium-radium mine*, accessed 23 January 2025 (<https://nuclear.australianmap.net/radium-hill/>).

¹⁰⁷ Parliament of Australia, *Australia's Uranium Mines Past and Present*, accessed on 22 January 2025 (https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Former_Committees/uranium/report/c07).

¹⁰⁸ Australian Nuclear and Uranium Sites, *Mary Kathleen former uranium mine*, accessed on 23 January 2025 (<https://nuclear.australianmap.net/mary-kathleen-former-uranium-mine/>).

¹⁰⁹ Department of Climate Change, Energy, the Environment and Water, *Uranium mining in the Alligator Rivers Region*, accessed on 23 January 2025 (<https://www.dcceew.gov.au/science-research/supervising-scientist/publications/uranium-mining-in-alligator-rivers-region>).

¹¹⁰ Australian Nuclear and Uranium Sites, *Nabarlek former uranium mine*, accessed 23 January 2025 (<https://nuclear.australianmap.net/nabarlek/>).

- (f) **Ranger** – ERA’s Ranger uranium mine is the most recent uranium mine to cease operations in Australia. The mine halted mining operations in 2012 but continued processing stockpiled U₃O₈ until 2021
- (g) **Beverley** – after discovery in 1969, plans to mine the Beverley Uranium Mine, comprising Beverley Central, Beverley North and Beverley Four Mile, were scrapped in 1983 after the South Australian Government at the time refused to approve uranium mining licenses. Approvals were eventually awarded in 1999 after a change in government and ISL commenced at Beverley Central and Beverley North in 2001. Uranium resources have since been mined out at Beverley Central and Beverley North¹¹¹.

Current uranium mining in Australia

- 181 There are currently three operating uranium mines in Australia – BHP Group Ltd’s Olympic Dam, Quasar Resources Ltd’s Four Mile Uranium Mine (Four Mile) and Boss Energy’s Honeymoon Uranium Mine (Honeymoon):
- (a) Olympic Dam operates as an underground mine with almost 700 km of underground roads and tunnels located approximately 560 km north of Adelaide in South Australia. The mine commenced operations in 1988 and is one of the world’s largest mineral resources, producing copper, gold, silver and uranium (as a by-product)
- (b) approximately 10 km west of Beverley Central, Four Mile is an ISL mine which commenced production in 2014. As at 2022, Four Mile was the world’s eighth largest producing uranium mine, accounting for 3% of global uranium production¹¹², supplying U₃O₈ to power utilities in the US
- (c) Honeymoon is located in South Australia, approximately 75 km northwest of Broken Hill, and commenced production in 2011 before suspending operations in 2013 due to falling uranium prices. Operations at Honeymoon were recommissioned in 2022 and ISL mining recommenced in 2024¹¹³.

Regulation in Australia

- 182 The regulatory framework governing uranium mining in Australia is complex as it involves Commonwealth, State and Territory Governments, with regulations varying by State and Territory¹¹⁴. Broad provisions regulating the uranium mining and nuclear energy industry in Australia is reflected within legislation such as the following:
- (a) *Australian Radiation Protection and Nuclear Safety Act 1998* (Cth) – which provides for the protection of human health and the environment from the harmful effects of

¹¹¹ World Nuclear Association, *Australia’s Uranium Mines*, accessed on 23 January 2025 (<https://world-nuclear.org/information-library/appendices/australia-s-uranium-mines#beverley-and-four-mile>).

¹¹² World Nuclear Association, *Uranium Mining Overview*, accessed on 23 January 2025 (<https://world-nuclear.org/information-library/nuclear-fuel-cycle/mining-of-uranium/uranium-mining-overview>).

¹¹³ Boss Energy announcement, *Boss produces first drum of uranium* 22 April 2024.

¹¹⁴ Source: Geoscience Australia website accessed 22 January 2025 (<https://www.ga.gov.au/scientific-topics/energy/legislation>).

radiation. The transportation of uranium and its by-products is regulated through general provisions of the Act, which relate to radiation hazards¹¹⁵

- (b) *Nuclear Non-Proliferation (Safeguards) Act 1987 (Cth)* – which was derived from the 1973 Treaty on the Non Proliferation of Nuclear Weapons and has the objective of ensuring the physical security of nuclear materials within Australia. Under this legislation, possession of nuclear material (including uranium) requires a permit and approval from the ASNO¹¹⁶
- (c) *Customs (Prohibited Exports) Regulations 1958 (Cth)* – which, under Regulation 9, requires an export licence for the export of radioactive material (including refined uranium, plutonium and thorium). Export applications are subject to assessment by DISR and the ASNO to ensure that Australian uranium is only being exported for peaceful, non-explosive purposes under Australia’s network of bilateral safeguards agreements¹¹⁷.

183 In addition, the Australian Radiation Protection and Nuclear Safety Agency, a Commonwealth Government agency that regulates Commonwealth entities that use or produce radiation with the objective of protecting people and the environment from the harmful effects of radiation, has produced the Radiation Protection range of codes and standards comprising:

- (a) code for the safe transport of radioactive material
- (b) code of practice and safety guide for radiation protection and radioactive waste management in mining and mineral processing¹¹⁸.

Commonwealth and NT – Ranger and Jabiluka

184 The NT Government owns all minerals and extractive minerals in the NT other than uranium, which belongs to the Commonwealth Government¹¹⁹ under the Atomic Energy Act¹²⁰.

185 The Atomic Energy Act (as amended) requires the Commonwealth Minister (currently the Commonwealth Minister for Resources and Northern Australia) to be notified upon discovery of a prescribed substance (i.e. uranium or thorium)¹²¹ and provides the Minister with the power to obtain information about prescribed substances^{122, 123}

186 Legislation and regulation more specific to Ranger and Jabiluka are set out in Section III.

¹¹⁵ Source: Geoscience Australia website (www.ga.gov.au) accessed 22 January 2025.

¹¹⁶ Source: Geoscience Australia website (www.ga.gov.au) accessed 22 January 2025.

¹¹⁷ Source: Geoscience Australia website (www.ga.gov.au) accessed 22 January 2025.

¹¹⁸ Source: NT Government, *Managing uranium and radioactive hazards* accessed 22 January 2025 (<https://nt.gov.au/industry/mining/mining-operations/managing-uranium-and-radioactive-hazards>).

¹¹⁹ Source: NT Government website (nt.gov.au) and Territory Resources website (northernterritoryresources.com.au), accessed 22 January 2025.

¹²⁰ Source: DISR website (industry.gov.au) accessed 22 January 2025.

¹²¹ Under s36 of the Atomic Energy Act.

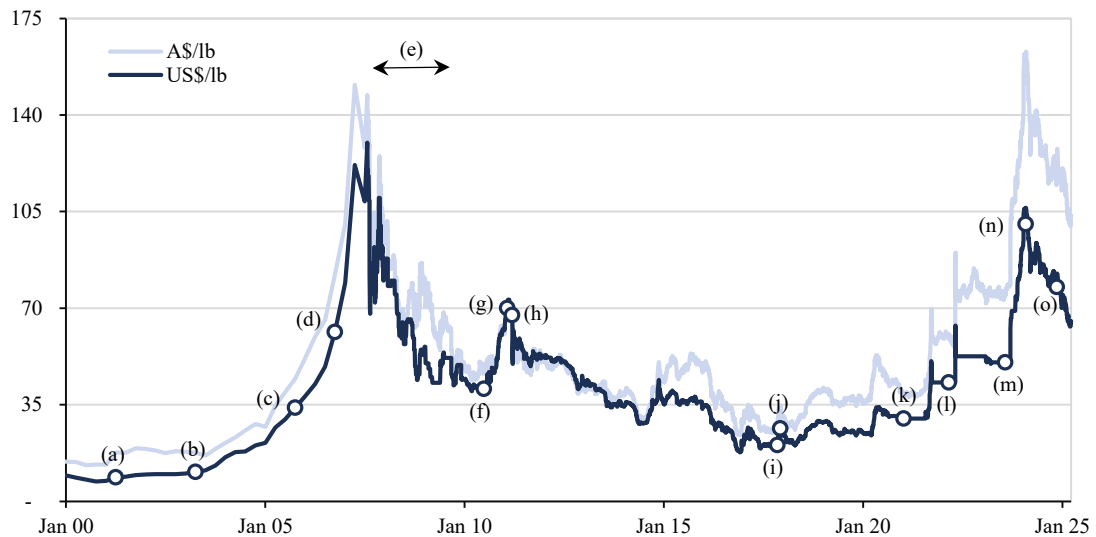
¹²² Under s37 of the Atomic Energy Act.

¹²³ Source: Geoscience Australia website (www.ga.gov.au) accessed 22 January 2025.

Uranium market and pricing

187 LEA notes that uranium is not typically traded in an open liquid market but instead is traded under negotiated contract. Pricing data for the period 1 January 2000 to 21 March 2025 is set out in the chart following:

Uranium NYMEX futures – \$/lb⁽¹⁾⁽²⁾
1 January 2000 to 21 March 2025



Note:

- 1 Due to a lack of available data, prices are quarterly until 1 July 2007 and daily thereafter. Data prior to 1 July 2007 uses NUEXCO exchange spot prices.
- 2 Prices sourced in US\$/lb and have been converted to AS\$/lb based upon the foreign exchange rate prevailing on the day.

Source: Federal Reserve Bank of St. Louis; FactSet UX-FDS uranium NY Mercantile (NYMEX).

188 Below is a summary of factors potentially influencing movements in the uranium price over the period depicted in the above chart:

- (a) **16 May 2001** – the US established the National Energy Policy to address “*the most serious energy shortage*” since the 1970s, detailing plans for the licensing of new reactors, expansion of existing reactors and investment into the safe management of nuclear waste¹²⁴
- (b) **6 April 2003** – cave-in and rock fall at Cameco’s McArthur River uranium mine and Key Lake uranium mill suspended operations for three months¹²⁵
- (c) **11 October 2005** – China released its Eleventh Five-Year Plan for National Economic and Social Development, detailing plans to “*actively push forward nuclear power construction*”¹²⁶

¹²⁴ National Energy Policy Development Group, *National Energy Policy*, dated 16 May 2001 (page viii).

¹²⁵ Cameco Corporation, *2011 Annual Report MD&A*, dated 8 February 2012 (page 71).

¹²⁶ Department of Industry Science and Resources, *Guidelines of the Eleventh Five-Year Plan for National Economic and Social Development*, dated 11 October 2005 (page 15).

- (d) **22 October 2006** – Cameco suspended mine development at its Cigar Lake Uranium Project due to flooding caused by a rock fall. Production was delayed from 2008 to 2013 as the expected impact on supply helped uranium prices to an all-time high of US\$140/lb in May 2007¹²⁷
- (e) **2007 – 2009** – the Global Financial Crisis reverted uranium prices to US\$72/lb by October 2007
- (f) **28 June 2010** – Honeywell International Inc suspended union workers at its joint uranium hexafluoride production plant in Illinois, US, due to pay disputes. Production ceased at the plant until an agreement was reached in July 2011¹²⁸
- (g) **28 January 2011** – ERA halted operations for 12 weeks at its Ranger Uranium Mine processing plant due to heavy rainfall¹²⁹
- (h) **11 March 2011** – Japan’s Fukushima nuclear power station was destroyed by a tsunami. Hydrogen explosions occurred at three of the four nuclear reactors due to overheating, and all four reactors were written off¹³⁰. Subsequent to this incident, uranium prices fell from US\$68/lb prior to the accident to a low of US\$18/lb in December 2016
- (i) **8 November 2017** – Cameco announced plans to suspend operations at its McArthur River mining and Key Lake milling operations due to continued uranium price weakness¹³¹. Operations recommenced in November 2022¹³²
- (j) **4 December 2017** – Kazakhstan’s national atomic company Kazatomprom Joint Stock Company announced production cuts of 20% per annum for the next three years “*in order to better align its output with demand*”¹³³
- (k) **8 January 2021** – ERA ceased processing uranium ore at its Ranger Uranium Mine
- (l) **24 February 2022** – Russia invaded Ukraine, threatening nuclear power supply chains. Uranium prices rose materially from US\$43/lb in February 2022 to a peak of US\$106/lb in February 2024
- (m) **26 July 2023** – Niger’s government was overthrown by a military coup. Mining permits have since been revoked at Orano SA’s Imouraren Project and GoviEx Uranium Inc’s Madaouela Project¹³⁴

¹²⁷ Cameco Corporation, *Cigar Lake Operation Northern Saskatchewan, Canada*, dated 22 March 2024 (page 2).

¹²⁸ United Steelworkers, *USW Members Ratify Labor Agreement to End 13-Month Lockout By Honeywell International at Metropolis Uranium Plant in Illinois*, dated 3 August 2011 (<https://usw.org/press-release/usw-members-ratify-labor-agreement-to-end-13-month-lockout-by-honeywell-international-at-metropolis-uranium-plant-in-illinois/>).

¹²⁹ ERA Annual Report 2011 (page 11).

¹³⁰ World Nuclear Association, *Fukushima Daiichi Accident*, dated 29 April 2024 (<https://world-nuclear.org/information-library/safety-and-security/safety-of-plants/fukushima-daiichi-accident>).

¹³¹ Cameco Corporation, *Cameco to suspend production from McArthur River and Key Lake operations and reduce its dividend*, dated 8 November 2017 (page 1).

¹³² Cameco Corporation, *Cameco Produces First Packaged Pounds Following McArthur River/Key Lake Restart*, dated 9 November 2022 (page 1).

¹³³ Kazatomprom Joint Stock Company, *Kazatomprom announces further production cuts*, dated 4 December 2017 (<https://www.kazatomprom.kz/en/media/view/kazatomprom-obyavil-o-dalneyshe-sokrashchenii-dobychi>).

¹³⁴ GoviEx, *GoviEx Uranium provides update on Madaouela project*, dated 4 July 2024 (page 1); Orano, *Update on the situation of the Imouraren mining project in Niger*, dated 20 June 2024

- (n) **30 January 2024** – Japan added uranium to its critical minerals list, citing supply threats raised by Russia¹³⁵
- (o) **12 November 2024** – the US set targets to triple nuclear energy capacity by 2050 through a combination of new reactor deployment, plant restarts, and upgrades at existing sites¹³⁶.

(<https://www.orano.group/en/news/news-group/2024/june/update-on-the-situation-of-the-imouraren-mining-project-in-niger>).

¹³⁵ Nikkei, *Government adds advanced electronic parts to “critical supplies”*, dated 30 January 2024 (<https://www.nikkei.com/article/DGXZQOUA303UN0Q4A130C2000000/>).

¹³⁶ US Department of Energy, *U.S. Sets Targets to Triple Nuclear Energy Capacity by 2050*, dated 12 November 2024 (<https://www.energy.gov/ne/articles/us-sets-targets-triple-nuclear-energy-capacity-2050>).

V Valuation of ERA

Overview of approach

- 189 The value of the ordinary shares in ERA, which are the subject of the Compulsory Acquisition, has been determined by assessing the market value of ERA as a whole, which we have then divided by the number of ordinary shares on issue (noting that ERA has only one class of share on issue).
- 190 Our valuation of ERA as a whole has been undertaken on the basis of market value as a going concern (consistent with the basis of preparation of ERA's financial statements¹³⁷) where market value is defined as the price that would be negotiated in an open and unrestricted market between a knowledgeable, willing but not anxious buyer and a knowledgeable, willing but not anxious seller acting at arm's length within a reasonable timeframe. Our assessment of value has considered and reflects the value of the synergy benefits (e.g. public company cost savings) that would be realisable by multiple purchasers (or put differently, the market as a whole), but does not reflect the value of any synergies or other benefits that may be unique to Rio Tinto.
- 191 An overview of generally accepted valuation approaches used in the determination of market value is set out in Appendix C.
- 192 ERA conducts no net cash generating activities¹³⁸, with its current operations primarily focused on the rehabilitation of the Ranger Project Area. However, ERA also has other assets, including mineral interest assets (such as MLN1) and cash. Given this, LEA considers the sum of the parts approach to be the most appropriate method for valuing ERA as a whole. This approach allows the value of ERA's individual assets and liabilities to be separately assessed using the most suitable methodology for each, with the resulting values then aggregated to determine ERA's overall value. In this regard, we note that:
- (a) the future liability for rehabilitating the Ranger Project Area is a finite obligation best assessed using a DCF analysis. LEA has engaged an independent technical specialist, SRK, to evaluate the reasonableness of the cost estimates prepared by ERA management
 - (b) ERA's mineral interest assets (including MLN1, the Ranger 3 Deeps project and the Cooper Creek JV) are undeveloped mineral interest assets that do not currently generate any revenue or cash flow. Given the absence of reliable long-term cash flow projections to support a DCF analysis, LEA has commissioned SRK to independently assess their value
 - (c) ERA's other asset and liability items predominantly comprise cash and cash equivalents, or other items that collectively are relatively negligible in value.

¹³⁷ In this regard, LEA notes the net asset deficiency of ERA as at 31 December 2024 (refer Section III), but also notes (by way of example, in the ERA 2023 Annual Report) Rio Tinto's public statements to the effect that it is committed to working with ERA to ensure the rehabilitation of the Ranger Project Area is successfully achieved to a standard that will establish an environment similar to the adjacent Kakadu National Park, and the circumstance that Rio Tinto subscribed for its full share of its entitlements in the 2024 Entitlement Offer.

¹³⁸ Other than deriving interest income and small amounts of rent income.

- 193 The sum of the parts methodology has been applied by separately assessing the following:
- (a) net cash balances and the value of government security receivables provided in relation to the Ranger Project Area rehabilitation liabilities
 - (b) the value (if any) attributable to ERA's undeveloped properties, including:
 - (i) MLN1 (which is primarily a function of the value of the project assuming all required development approvals are received, multiplied by the probability of these development approvals being obtained)
 - (ii) the Ranger 3 Deeps project (within ELA9644)
 - (iii) ERA's other exploration licence applications
 - (c) the present value of expected future costs of the Ranger Project Area rehabilitation (net of an allowance for the potential tax deductibility of this spend)
 - (d) the value of ERA's other sundry assets and net working capital balances.
- 194 LEA notes that given the significant uncertainty as to the value of the expected future Ranger Project Area rehabilitation costs and the value of MLN1 (that is, variability of plausible value outcomes), this will result (prima facie) in a range that is broader than convention.
- 195 A key aspect of our valuation is our view that it is reasonable to expect an acquirer of 100% of the equity of ERA would need to take responsibility for the full rehabilitation of the Ranger Project Area and cover any shortfall that arises between the rehabilitation costs and the value or cash flows that may be generated by ERA's assets (including MLN1). That is, an acquirer would need to commit to fully fund the Ranger Project Area rehabilitation costs (either by injecting capital or otherwise guaranteeing ERA's obligation) before the actual outcomes for MLN1 are resolved (and hence before its final value is known). In effect, this means that an acquirer could not rely upon ERA's limited liability (corporate) structure to limit its downside exposure to \$nil while maintaining full upside potential (being the option-like position enjoyed by ERA's minority shareholders¹³⁹). We have adopted this approach because:
- (a) given the extensive regulatory and approvals regime in place for uranium mining in Australia, in LEA's view, it is reasonable to expect that the relevant government authorities and ministers would have significant regard to whether a potential acquirer of 100% of ERA has the financial capacity to fully fund the rehabilitation of the Ranger Project Area and has committed to do so before making a determination to renew / extend MLN1 (being the primary driver of the upside potential of ERA), or consenting to a change in control of ERA (as applicable)
 - (b) any firm of a type that would be interested, in and capable of, acquiring 100% of ERA would, in LEA's view, likely suffer significant reputational damage¹⁴⁰ – at least in Australia and probably globally – in the event that it failed to contribute the necessary funds to complete the Ranger Project Area rehabilitation.

¹³⁹ The issue of optionality is explored in greater detail from paragraph 227, and may explain why the historical trading prices for minority interest parcels of ERA shares are higher than the value estimated by a fundamentals based controlling interest analysis (which does not limit the downside exposure to \$nil).

¹⁴⁰ That may result in a material adverse impact on that firm's cost of capital and probability of receiving approvals for future projects.

- 196 As a result of our view, LEA has allowed for the full negative impact of scenarios that produce negative net equity outcomes, rather than limiting these outcomes to \$nil.
- 197 As a cross-check of our assessment of the value of ERA's ordinary shares we have also considered recent share price trading including prices paid for ordinary shares in ERA over the previous six months (as required under s667C of the Corporations Act).

Net cash and government security receivable

- 198 As at 28 February 2025, ERA had some \$760 million¹⁴¹ of cash and cash equivalents and no debt. As referenced at paragraph 140(a) above, ERA's cash balance increased significantly following the receipt of some \$766 million (before costs) from the 2024 Entitlement Offer and the issue of new shares under the shortfall facility.
- 199 As at 28 February 2025, ERA had some \$539 million¹⁴² in term deposits held with DISR. ERA's access to these funds is limited to funding Ranger Project Area rehabilitation activities.

Value of MLN1 (Jabiluka)

- 200 The assessment of the value of any mining tenement is an exercise in judgement given the qualities and characteristics of the subject asset and the economic, regulatory, capital market and commodity market conditions existing at the time of the valuation
- 201 In relation to MLN1 in particular, LEA notes:
- (a) a mineral resource has been estimated at MLN1 for a number of years, but now ERA no longer includes MLN1 in its reported mineral resources
 - (b) both ERA and Rio Tinto have made public statements to the effect that MLN1 will not be developed without the approval of the Mirarr Traditional Owners
 - (c) the Mirarr Traditional Owners have, for some four decades, opposed and continue to oppose the development of MLN1
 - (d) the NT Government, based upon advice received from the Commonwealth Government, did not renew MLN1 when the initial lease term expired in August 2024
 - (e) ERA's tenure to MLN1 is now secured by virtue of a Federal Court stay order pending a decision from the Federal Court
 - (f) the Federal Court's decision will post-date this report and as at the time of writing, LEA is not able to reliably estimate what decision may be taken by the Federal Court in terms of either the Renewal Decision itself or any future orders the Court may make.
- 202 Specifically in relation to MLN1, given that testwork, plans and cost estimates of any development of MLN1 are not sufficiently advanced to be considered a pre-feasibility study level of confidence, and notwithstanding that ERA has historically conducted DCF analyses as part of its financial reporting impairment testing, given the importance of this asset to the

¹⁴¹ \$791 million at 31 December 2024.

¹⁴² \$535 million at 31 December 2024.

overall value of ERA, in LEA's view, a DCF analysis of MLN1 (with appropriate adjustment for tenure risk) is unlikely to be sufficiently reliable to form a primary basis of valuation.

203 To assist LEA in attributing a value to MLN1, LEA has engaged SRK to provide an opinion on the value of MLN1. LEA requested that SRK consider both:

- (a) an unencumbered value of MLN1, in particular, unencumbered by the Renewal Decision and Mirarr Traditional Owner consent, and thus prior to the change to no longer include MLN1 in reported mineral resources
- (b) an "as is" opinion on the value of MLN1, reflecting encumbrances arising from the Renewal Decision and position of the Mirarr Traditional Owners and, if considered appropriate, the circumstance that ERA no longer includes MLN1 in reported mineral resources.

SRK's assessment of unencumbered value

204 The value of MLN1 on an unencumbered basis was based on the following assumptions:

- (a) the Measured, Indicated and Inferred mineral resource as previously reported by ERA in its 2023 Annual Report as outlined at paragraph 129 (and in Table 4.3 of the SRK Report)
- (b) further technical studies and modelling are required to demonstrate practical feasibility and economic viability of mining the Jabiluka II deposit within MLN1 prior to any future development or mining
- (c) MLN1 is granted for a term of up to 10 years (and potentially extendable beyond this timeframe)
- (d) the Mirarr Traditional Owners duly consent to the development and future mining of the Jabiluka II deposit
- (e) the Commonwealth and NT Governments duly authorise the development and future mining of the Jabiluka II deposit
- (f) all parties would readily agree terms to enable a transaction to complete.

205 In establishing the unencumbered value of MNL1, SRK has adopted the market valuation approach using precedent transactions (both mineral asset and corporate entities) and peer trading multiples for the defined mineral resources.

Precedent mineral asset transactions

206 SRK considered transactions of mineral interests that met the following parameters (on the basis that, in SRK's view, these best reflect the development status positioning that would be adopted by market participants in evaluating MLN1):

- (a) transactions completed between January 2018 and 28 February 2025
- (b) projects located in Australia, Canada or the USA
- (c) projects that remained in development (spanning scoping to feasibility study levels)
- (d) projects envisaged conventional underground mining and processing operations, but without significant installed infrastructure in place
- (e) projects with grades of 0.25% U₃O₈ or higher.

- 207 The implied transaction multiples were then expressed in A\$/lb of contained U₃O₈, calculated from the stated transaction value (at the grossed up acquisition cost) and the total contained resource and/or reserve pounds of contained U₃O₈ defined within the project at the time of the transaction. These multiples were then adjusted upward / downward based on the difference between the average monthly uranium spot price at the time of the transaction and the average monthly uranium price during the month preceding the valuation date¹⁴³.
- 208 SRK noted that transactions involving mineral assets in production and at advanced exploration stages were not appropriate given the status of MLN1. Further, SRK note that no transactions relating to projects either at the feasibility stage or in care and maintenance were identified over the period considered.

Precedent corporate entity transactions

- 209 SRK also considered corporate transactions (acquisitions) of listed uranium companies that occurred in the five years prior to 20 February 2025 with a transaction value in excess of US\$20 million and reported resources in excess of 40 Mlbs of U₃O₈ equivalent.
- 210 As with the precedent transactions, the implied resource multiples from the corporate entity transactions were expressed in A\$/lb terms and adjusted for the difference in the spot price of uranium. LEA assisted in this process by providing SRK with the values attributed to acquired mineral interests by the bidder companies as reported within their financial statements.

Peer trading analysis

- 211 SRK also considered listed companies that hold pre-development to development stage uranium projects with total uranium mineral resources in excess of 80 Mlbs of U₃O₈.
- 212 LEA assisted in this process by proving SRK with implied mineral interest values based on listed company share price and company data and provided an instruction to SRK in relation to a premium for control.
- 213 SRK also considered the peer company cost profiles, although also noted that the most recent cost estimates for Jabiluka date back to 2011 (as part of the order of magnitude update of 2007 costings), and hence were no longer relevant¹⁴⁴.

SRK valuation outcome

- 214 Based on their analysis of precedent transactions of mineral interests, precedent transactions of corporate entities and peer trading analysis, SRK ascribed the following values to MLN1 on an unencumbered basis:

SRK value outcomes – MLN1 on an unencumbered basis⁽¹⁾		
	Low \$m	High \$m
Precedent mineral asset transactions	890.3	1,131.9
Precedent corporate entity transactions	788.5	969.8
Peer trading analysis	769.5	1,011.1
Selected ⁽²⁾	816.1	1,037.6
Implied multiple of mineral resource (A\$/lb U ₃ O ₈) ⁽³⁾	2.70	3.43

¹⁴³ Refer SRK Report, Section 7.5.1 Market evidence – Mineral Resources.

¹⁴⁴ SRK also notes that a number of ERA’s peers hold exposures to minerals other than uranium.

Note:

- 1 Rounding differences may exist.
- 2 LEA notes that in ascribing a value to MLN1 on an unencumbered basis SRK applies equal weighing to the values implied by all three datasets in determining its overall value positioning. SRK state that their selected unencumbered value is based on the mid-point of the range as SRK has no preference towards either end of the range.
- 3 Value per A\$/lb of resource based on ERA's previously (31 December 2023) reported uranium resource for MLN1 of 302.3 Mlbs.

Source: SRK Report Table 7.12.

SRK's assessment of encumbered value

- 215 SRK's encumbered value analysis takes into account the uncertainties associated with the renewal of MLN1, Mirarr Traditional Owners' and other stakeholders' opposition to future development in light of existing agreements and governmental positioning to incorporate MLN1 into the Kakadu National Park, specifically (and distinct from the unencumbered value):
- (a) ERA's decision to no longer include MLN1 in its reported mineral resources
 - (b) having been rejected by the NT Government on advice from the Commonwealth Government, the renewal of MLN1 remains in statutory limbo pending Federal Court orders
 - (c) the Mirarr Traditional Owners remain strongly opposed to any future development and/or mining of the Jabiluka II deposit
 - (d) ERA and Rio Tinto remain committed to not undertaking any development and/or mining of the Jabiluka II deposit without the consent of Mirarr Traditional Owners in accordance with ERA's Long Term Care and Maintenance Agreement
 - (e) ERA remains responsible for the ongoing rehabilitation and security of MLN1
 - (f) the NT Government has gazetted a reservation (which excludes any form of mineral tenure and future exploration / extraction of minerals) pertaining to the entire area covered by MLN1, which comes into effect upon the expiry of MLN1
 - (g) the Commonwealth Government has made public statements that it has commenced the incorporation of the Jabiluka site into Kakadu National Park
 - (h) it remains to be determined whether the Commonwealth and/or NT Governments would authorise any future development or mining of the Jabiluka II deposit pending an application to do so
 - (i) it remains to be determined if all parties (including Mirarr Traditional Owners, the Commonwealth and NT Governments and other stakeholders) would agree terms to enable a transaction to complete.
- 216 LEA notes the inherent difficulty in assessing the impact on value of the Renewal Decision and the long-standing opposition to future development of MLN1 by the Mirarr Traditional Owners (i.e. the principal encumbrances of MLN1). LEA does note, however, an indicator of the effects of these risks was the decision of ERA to no longer include MLN1 in its reported mineral resources. LEA also notes that to better understand the effects of such circumstances, in ascribing a value to MLN1 on an encumbered basis, SRK conducted an internal poll of

geologists involved in the reporting of mineral resources, and as a result of that inquiry SRK has adopted the following two valuation approaches:

- (a) a top-down approach – being a risk weighted adjustment to the defined measured, indicated and inferred resources as previously reported by ERA, in which the multiples for an inferred resource are discounted by 50% and then applied to all defined resource categories. SRK notes that this discount is based on that typically applied by SRK (and in many cases by other mineral asset practitioners) when evaluating the value associated with Exploration Targets as defined in Clause 17 of the JORC Code (2012)
- (b) a bottom up approach – which notes ERA’s (and previously, Rio Tinto’s) decision to no longer report mineral resources, which implies that the MLN1 defined mineralisation is unable to demonstrate reasonable prospects of eventual economic extraction and despite known mineralisation being evident, realistic mining parameters (including the sourcing of associated approvals) and a development pathway are unable to be demonstrated within the foreseeable future. The implication of this is that the project should be relegated to only consideration of the exploration potential associated with the project. As a result, SRK considered both the comparable precedent transaction method (referencing the acquisition of the Ben Lomond deposit, which SRK considers to be reflective of an acquisition of a constrained asset¹⁴⁵ and a geoscientific rating method.

217 Based on the above, SRK has opined on the following values:

SRK value outcomes – MLN1 on an encumbered basis ⁽¹⁾		
	Low \$m	High \$m
Top-down approach		
Precedent mineral asset transactions	362.4	483.3
Precedent corporate entity transactions	332.2	422.8
Peer trading analysis	302.0	422.8
Bottom-up approach		
Ben Lomond transaction	151.1	332.5
Geoscientific rating	51.0	205.6
Range adopted ⁽²⁾	332.2	443.0
Implied multiple of mineral resource (A\$/lb U ₃ O ₈) ⁽³⁾	1.10	1.47

¹⁴⁵ By virtue of the circumstance that uranium mining was not permitted at the time of the transaction, and remains prohibited to this day.

Note:

- 1 Rounding differences may exist.
- 2 LEA notes that in ascribing a value to MLN1 on an encumbered basis SRK applies equal weighing to the values implied by precedent transactions (both mineral asset and corporate entities) and peer trading from its top-down approach. SRK notes that for the selected encumbered value, SRK has elected to assign a value at the lower end of the range in recognition of the various uncertainties which remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal), ERA's recent write downs of the project value in its financial accounts, the longstanding and intergenerational opposition to the development of Jabiluka by the Mirarr Traditional Owners and the downward trajectory implied by ERA's decision to no longer report mineral resources at Jabiluka.
- 3 Value per A\$/lb of resource based on ERA's previously (31 December 2023) reported uranium resource for MLN1 of 302.3 MLbs.

Source: SRK Report Table 7.21 and LEA analysis.

Cross-checks

- 218 LEA has cross-checked the findings of the SRK valuation against the implied values attributed to MLN1 based upon the market traded price of ERA shares (over time) as well as the 2023 Interim Entitlement Offer and the 2024 Entitlement Offer.

Implied values based on the traded price of ERA shares (over time)

Market inferred value

- 219 LEA has considered the implied value of MLN1 based on the traded prices of ERA shares. A broad estimate of the implied value of MLN1 has been calculated by:
- (a) determining the historic market capitalisation of ERA (share price multiplied by shares on issue)
 - (b) adding to this, the reported Ranger Project Area rehabilitation provision¹⁴⁶ (on a tax deductible and non-tax deductible basis¹⁴⁷), to derive a market implied value for ERA's net assets excluding the rehabilitation provision (e.g. net cash, security deposits, plant and equipment, MLN1, employee liabilities etc.)
 - (c) and deducting, the reported net cash and security deposit balances, to derive a residual value which is attributed to MLN1¹⁴⁸.

¹⁴⁶ Changes to the rehabilitation provision have been incorporated from the date at which changes to the rehabilitation provision were announced.

¹⁴⁷ The implied value of MNL1 is higher where a tax deduction is assumed not to be available as under this scenario the after tax cost of the expected rehabilitation is higher. With a larger liability, and given an assumed fixed cash balance, the implied value of MLN1 needs to be higher to explain the market capitalisation. LEA notes that its estimate of the tax deduction available is based upon a present value estimate adopting a 30% tax rate and a modifying factor based on discounting expected future rehabilitation costs at a cost of equity based discount rate.

¹⁴⁸ LEA acknowledges that this residual is attributable to all residual assets and may plausibly include value attributable to ERA's mineral interests other than MLN1. For the purposes of this analysis, we have assumed the value of all other residual assets (other than MLN1) are immaterial.

- 220 Our analysis has been conducted over the period 31 August 2022¹⁴⁹ to 21 March 2025. This period post-dates the end of ERA’s (Ranger) production and sales activities.
- 221 In conducting this analysis, LEA acknowledges that the market capitalisation of ERA is calculated by reference to the listed price of ERA shares and is therefore prima facie, stated on a “minority interest” basis. That is, the calculated market capitalisation does not, prima facie, incorporate any control premium that may be appropriate in a change of control transaction¹⁵⁰. However, in LEA’s view, a large proportion of the conventional premium is likely to already be factored in ERA’s traded prices. This is because:
- (a) Rio Tinto held no less than 86% of ERA over the observed period (with the holding increasing to over 98% from November 2024 as a result of the 2024 Entitlement Offer)
 - (b) on 29 August 2024¹⁵¹ Rio Tinto stated that if it acquired shares under the 2024 Entitlement Offer that resulted in it holding 90% or more of the shares in ERA, then Rio Tinto intended to proceed with the compulsory acquisition of all remaining shares at \$0.002 per share. This intention was confirmed by Rio Tinto on 19 November 2024, when it was known that its interest in ERA had surpassed 90%¹⁵².
- 222 LEA notes that throughout this period ERA was a very thinly traded stock and the analysis should therefore be treated with a high degree of caution. LEA also notes that this trading period pre-dates ERA’s decision to no longer recognise a mineral resource for MLN1 and that it is not possible to determine the price at which ERA shares may have traded had no mineral resource been reported by ERA for MLN1.
- 223 The implied value of MLN1 based on the ERA share price over the period from 31 August 2022 to 21 March 2025 is set out below:

¹⁴⁹ On 30 August 2022, ERA released its interim report for the half year to 30 June 2022, in which ERA noted that the final drum of uranium oxide produced at Ranger was sold in May 2022 (Source: ERA Interim Report, half year to 30 June 2022).

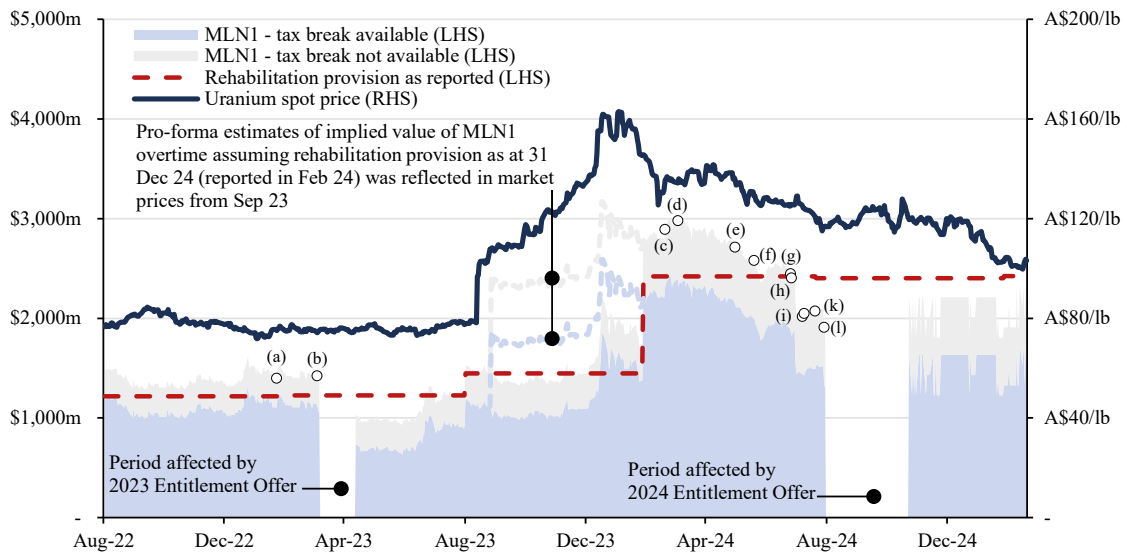
¹⁵⁰ LEA notes that, depending on the circumstances, the premiums paid in successful change of control transactions in Australia are generally in the order of 30% to 35% above the market price of minority shareholdings prior to the announcement of an offer, assuming the market price does not already reflect anticipation of an imminent offer.

¹⁵¹ Source: ERA announcement *Capital Raising Presentation (for Entitlement Offer)* 29 August 2024.

¹⁵² Source: Rio Tinto announcement, *Rio Tinto takes up full entitlements in ERA rights issue, moving to over 98% ownership*, 19 November 2024.

Implied MLN1 value

31 August 2022 to 21 March 2025⁽¹⁾⁽²⁾⁽³⁾⁽⁴⁾



Note:

- 1 LEA notes the following announcements released during the review period:
 - (a) release of preliminary financial report for FY22 (22 February 2023)
 - (b) proposed issue of 18.1 billion securities (4 April 2023)
 - (c) ERA lodged the application for renewal of MLN1 (20 March 2024)
 - (d) Rio Tinto officially started managing Ranger Rehabilitation Project (3 April 2024)
 - (e) ERA advised that Zentree has submitted an application with the Takeovers Panel seeking immediate orders to delay the 2024 Entitlement Offer (30 May 2024)
 - (f) Takeovers Panel declines to conduct proceedings (19 June 2024)
 - (g) Renewal Decision announced (26 July 2024)
 - (h) press speculation emerged after market close, regarding an offer for MLN1 from Boss Energy (28 July 2024). ERA confirmed the speculation (on 29 July 2025) and noted that the proposal was withdrawn subsequent to the Renewal Decision
 - (i) ERA commenced legal proceedings challenging the Renewal Decision (6 August 2024)
 - (j) Federal Court issued an interim order to stay the decision to refuse the renewal application (9 August 2024)
 - (k) 1H24 results released (20 August 2024)
 - (l) announcement of proposed 2024 Entitlement Offer (29 August 2024).
- 2 LEA notes that during the period September 2023 to December 2023, ERA made announcements to the effect that the rehabilitation provision would increase from the June 2023 reported provision of \$1.3 billion. On 12 December 2023, ERA announced that the provision was expected to be approximately \$2.3 billion, and a figure of \$2.4 billion at 31 December 2023 was confirmed in February 2024 on release of ERA's Appendix 4E preliminary final report. LEA has therefore incorporated a pro-forma estimate of the implied value of MLN1 assuming that the provision confirmed in February 2024 was incorporated into market participants' analyses from September 2023. LEA notes that this may tend to overstate the assumed provision – and therefore the implied value of Jabiluka – in the earlier part of that period.
- 3 LEA has left blank the period during which the 2023 Interim Entitlement Offer and the 2024 Entitlement Offer were conducted – as during these periods ERA shares traded on an ex-entitlement basis but without certainty of the number of shares to be issued and the cash to be raised.
- 4 Market capitalisation is based on closing prices and shares outstanding. LEA acknowledges that the residual value is attributable to all residual assets and may plausibly include value attributable to ERA's mineral interests other than MLN1. For the purposes of this analysis, we have assumed the value of all other residual assets (other than MLN1) are immaterial.

Source: FactSet, ERA announcements and LEA analysis.

224 In relation to the above, LEA notes the following:

- (a) trading in the period 3 January 2023 to 5 April 2023 (prior to the 2023 Interim Entitlement Offer), a period when the uranium spot price traded in the broad region of A\$75/lb, the implied value of MLN1 was in the region of \$1.1 billion (tax deduction available on Ranger Project Area rehabilitation costs) to \$1.4 billion (tax deduction not available on Ranger Project Area rehabilitation costs)
- (b) the uranium price increased significantly from around mid-September 2023 to around mid-late January 2024. However, ERA's market capitalisation remained largely unchanged until late December 2023. This may be explained by the circumstance that, during the early part of this period, ERA released announcements regarding an expected material increase in the rehabilitation costs of Ranger Project Area¹⁵³
- (c) from 2 January 2024 to 16 January 2024, ERA's market capitalisation increased significantly (some 90% in broad terms). ERA responded to a Price Query from the ASX stating that it was not aware of any information concerning it that had not been announced to the market, but noted there had been a significant appreciation in the global uranium spot price over the prior week¹⁵⁴
- (d) at its peak (around the end of March 2024), and with the market having had the opportunity to consider the material change in reported Ranger Project Area rehabilitation provision as at 31 December 2023, the implied value of MLN1 increased to some \$2.5 billion (tax deduction available) and some \$3.0 billion (tax deduction not available). LEA notes, however, that the market capitalisation and implied values for MLN1 declined subsequent to that date, coinciding with a decrease in the uranium spot price
- (e) the trading day prior to the announcement of the Renewal Decision (25 July 2024), the implied value of MLN1 was in the region of \$1.9 billion (tax deduction available) and some \$2.4 billion (tax deduction not available)
- (f) over three consecutive trading days (26, 29 and 30 July 2024), ERA announced the Renewal Decision, confirmed the receipt (and subsequent withdrawal) of Boss Energy's offer for MLN1 and released the June 2024 quarterly activities report. On 30 July 2024, the share price of ERA decreased resulting in the implied value of MLN1 decreasing to some \$1.6 billion (tax deduction available) and \$2.1 billion (tax deduction not available), being a reduction of some 17% (tax deduction available) to 13% (tax deduction not available) relative to the implied values on 25 July 2024
- (g) the implied value of MLN1 remained at broadly similar values until the 26 August 2024 trading halt and announcement of the proposed 2024 Entitlement Offer on 29 August 2024. LEA considers trading in ERA shares after this date to be an unreliable indicator of value. This is because, inter alia:
 - (i) during the 2024 Entitlement Offer period ERA shares traded on an ex-entitlement basis but without certainty of the number of shares to be issued and the cash to be raised

¹⁵³ For example, ERA Announcement, *Rangers Project Area Rehabilitation Update*, 26 September 2023.

¹⁵⁴ Source: ERA Announcement, *Price Query*, 16 January 2024.

- (ii) from 29 August 2024, the traded market price of ERA shares was influenced (or “disturbed”) by the Compulsory Acquisition¹⁵⁵.

225 As noted at paragraph 281, the spot price of uranium has declined since August 2024. While it is not possible to determine with any certainty the current price at which ERA shares would trade in the absence of the Compulsory Acquisition and thus what the current inferred value of MLN1 may be, as a guide we have:

- (a) estimated the value of MLN1 based on LEA’s view of the “undisturbed” share price of ERA per paragraph 283 (which takes into account the Renewal Decision, the dilutive impact of the 2024 Entitlement Offer and adjusts for the decline in the spot price of uranium and ERA’s estimated cash burn through to 28 February 2025) and ERA’s 28 February 2025 balance sheet. This analysis is summarised below:

MLN1 – implied value based on “undisturbed” price of ERA ⁽¹⁾		
	Paragraph	\$m
“Undisturbed” share price (adjusted) (\$) ⁽²⁾	283	0.0023
Ordinary shares outstanding (million)	269	405,396.2
Implied market capitalisation		932
Deduct cash and Government security receivable	198, 199	(1,300)
Add Ranger Project Area rehabilitation provision	257	2,403
Deduct tax deduction on rehabilitation costs ⁽³⁾	262	(577)
Add / (deduct) net other sundry assets and net working capital	268	14
Implied value of MLN1 (tax deduction available)⁽⁴⁾		1,473
Implied value of MLN1 (tax deduction not available)⁽⁴⁾		2,049

Note:

- 1 Rounding differences may exist.
- 2 In LEA’s view a large proportion of the conventional premium is likely to already be factored in ERA’s traded prices.
- 3 LEA notes that its estimate of the tax deduction available is based upon a present value estimate adopting a 30% tax rate and a modifying factor based on discounting expected future rehabilitation costs at a cost of equity based discount rate.
- 4 For the avoidance of doubt, but before any impact of the write-down of resources to nil.

Source: ERA management accounts and LEA analysis.

- (b) considered the implied values as of the period 19 September 2023 to 25 September 2023, when the spot price of uranium was last around A\$104/lb¹⁵⁶, which approximated \$1.1 billion (tax deduction available) and \$1.5 billion (tax deduction not available). On 26 September 2023, ERA announced that ERA now expects that the total rehabilitation costs will materially exceed the previous estimated range of \$1.6 billion to \$2.2 billion and that the expected final completion date will also be delayed¹⁵⁷. We have reflected the estimated impact of this announcement on the implied value of MLN1 by including a retrospective adjustment (of \$974 million) based upon the final confirmed provision as at 31 December 2024 (see pro-forma line in the

¹⁵⁵ On 29 August 2024, Rio Tinto announced that in the event that its interest in ERA increased to over 90% as a result of the 2024 Entitlement Offer, it intended to proceed with the compulsory acquisition of all remaining ERA shares at \$0.002 per share. This intention was confirmed by Rio Tinto on 19 November 2024 when it was known that its interest in ERA had surpassed 90%.

¹⁵⁶ A\$103/lb average over the five trading day period ended 25 September 2023.

¹⁵⁷ Source: ERA announcement, *Ranger Project Area rehabilitation update*, 23 September 2023.

chart above). If this same retrospective adjustment is extended through to the period of 19 September 2023 to 25 September 2023 the implied value of MLN1 increases to \$1.9 billion (tax deduction available) and \$2.5 billion (tax deduction not available). However, these values did not account for factors such as the Renewal Decision. Adjusting these downward by some 17% (tax deduction available) to 13% (tax deduction not available)¹⁵⁸ results in an implied value for MLN1 of \$1.6 billion (tax deduction available) to \$2.2 billion (tax deduction not available).

- 226 These estimates should be viewed as illustrative and do not represent a definitive assessment of the implied value of MLN1. There is no certainty that the market would have assigned, or would currently assign, these values to MLN1 in the absence of the Compulsory Acquisition or with knowledge of ERA's decision to no longer include MLN1 in reported mineral resources. That being said, we note that the calculated ranges derived above exceed the encumbered value opinion of SRK. Setting aside potential mispricing issues that likely result from ERA's status as a very thinly traded stock and the issue pertaining to ERA's decision to no longer include MLN1 in ERA's reported mineral resources, in LEA's view, this discrepancy may be explained by the existence of optionality.

In-substance call-option value

- 227 In LEA's view, there is a material disconnect between the manner in which traders of minority interest parcels of ERA shares are able to price the shares and the manner in which a purchaser of 100% of the equity of ERA would be able to price 100% of the shares.
- 228 This arises from the "in-substance" call option value within minority interest parcels of shares that, in LEA's view, is unlikely to be available to a 100% interest holder of shares in ERA. This in-substance call option arises from:
- (a) the high amount of the expected Ranger Project Area rehabilitation costs (which acts as an "exercise price" equivalent), and
 - (b) the significantly wide range of the possible value outcomes that might arise from any potential future development of MLN1, which range from \$nil in the event that MLN1 is not renewed or, alternatively, renewed but never developed (in accordance with the long-held wishes of the Mirarr Traditional Owners), to a very substantial value in scenarios in which MLN1 is renewed and ultimately successfully developed.
- 229 In the event of a \$nil value outcome for MNL1, given the size of the rehabilitation obligations and the extent to which they exceed available cash balances, a significant net asset / net equity deficiency position would arise for ERA. However, individual shareholders are protected from this net asset / net equity deficiency outcome due to ERA being a limited liability company. Accordingly, minority shareholders are able to avoid all negative value outcomes (i.e. value outcomes of less than \$nil) whilst simultaneously retaining the ability to participate in the upside that arises in circumstances where MLN1 is renewed and successfully developed and the positive returns thereof exceed the Ranger Project Area rehabilitation costs¹⁵⁹.

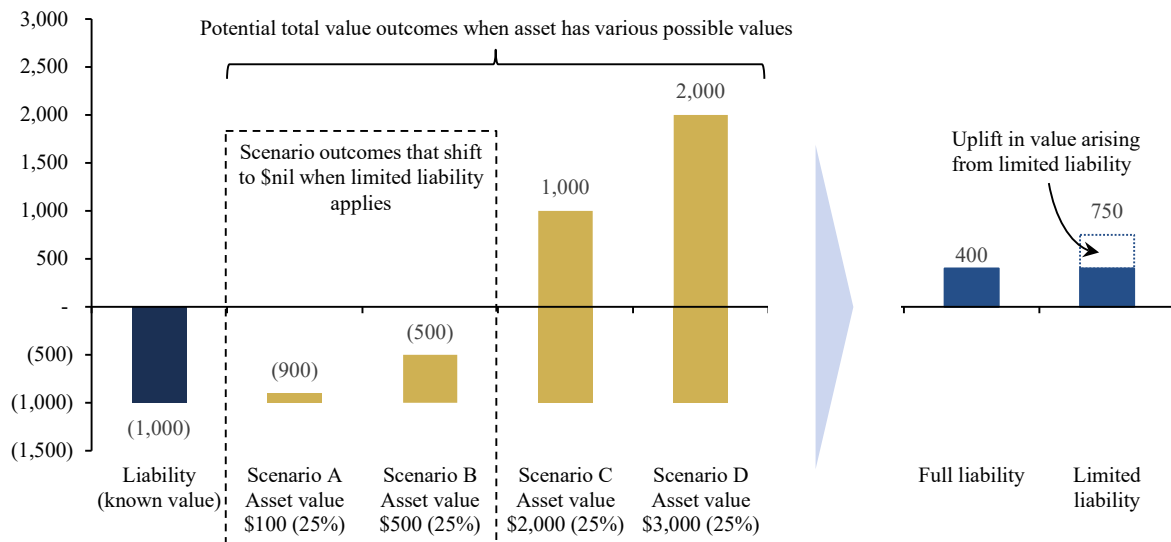
¹⁵⁸ Being the declines referenced at paragraph 224(f).

¹⁵⁹ Much like the holder of a call option is able to avoid all negative outcomes, by not exercising the option in circumstances where the exercise price is greater than the value of the asset to which the option relates, but simultaneously retain exposure to the value that may exist over and above the exercise price.

230 In short, minority shareholders, due to the limited liability nature of ERA shares, have limited downside exposure whilst simultaneously having unlimited upside potential. The existence of the call option like characteristics essentially allow for the recognition and payment by minorities of additional value for ERA shares (known as "time value" for options).

231 This can be demonstrated in the following diagrammatic example that involves a situation where an entity has a liability obligation, with a (negative) value that is known with a high degree of certainty, and an asset that has a wide range of possible (positive) values. If those scenarios which result in a total negative value outcome (i.e. where the asset value is less than the liability) are able to be avoided, due to for example the entity being a limited liability company, the value of that entity increases relative to a circumstance where those scenarios cannot be avoided.

Impact of limited liability on value
Potential total value outcomes⁽¹⁾ **Probability weighted value⁽²⁾**



Note:

- 1 Where there is a liability that has a value that is known with a high degree of certainty, plus an asset that has a wide range of possible values (each of which is weighted with a 25% probability of occurrence in this example).
- 2 The probability weighted total value outcome depends upon whether limited liability exists. Where no limited liability exists, the probability weighted outcome is calculated as the sum of each scenario outcome, weighted by its probability of occurrence (i.e. minus \$900 multiplied by 25%, minus \$500 multiplied by 25%, plus \$1,000 multiplied by 25%, plus \$2,000 multiplied by 25%). However, where limited liability applies, any scenario with a negative outcome is shifted to \$nil instead of retaining its negative amount. The elimination of the negative outcomes results in an increase in total value.

232 This additional optionality value may explain why the historical trading prices for minority interest parcels of ERA shares are higher than the value estimated by a fundamentals based controlling interest analysis (which does not cap the downside exposure to \$nil).

233 In LEA's view, however, given the nature of MLN1 and its history, the position of a 100% shareholder in ERA (be that Rio Tinto or any other 100% shareholder) is different to that of a minority shareholder. As referenced at paragraphs 195 and 196, in LEA's view, it is reasonable to expect an acquirer of 100% of the equity of ERA would need to take

responsibility for the rehabilitation of the Ranger Project Area, meaning that the acquirer would need to cover any shortfall that arises between the rehabilitation costs and the value or cash flows generated by ERA's assets (including MLN1), and could not rely upon ERA's limited liability (corporate) structure to limit its downside exposure to \$nil.

- 234 Because of this, whilst a purchaser of a minority interest is able to avoid a negative equity outcome, in LEA's view, an acquirer of 100% of the equity in ERA will not be able to avoid such outcomes.

Conclusion on market inferred value

- 235 For this reason, and given that LEA is compelled by the Corporations Act to assess the value of ERA "as a whole" (i.e. not on a minority basis), LEA considers that the traded market prices paid for ERA shares are not a reliable reference point for the determination of the market value of the equity in ERA on a 100% controlling interest basis, and any implied value of MLN1 that might be derived therefrom is also not reliable¹⁶⁰.

Implied value based on entitlement offers

- 236 LEA has also considered the implied value of MLN1 based on the 2023 Interim Entitlement Offer and the 2024 Entitlement Offer. The 2023 Interim Entitlement Offer sought to raise some \$369 million before costs, and the 2024 Entitlement Offer sought to raise some \$880 million before costs. In conducting this analysis, LEA notes the following:

- (a) in relation to the 2023 Interim Entitlement Offer, ERA stated:
 - (i) the proceeds were expected to provide ERA with sufficient cash to fund its planned Ranger Project Area rehabilitation expenditure to the end of 2Q24, repay the existing Rio Tinto credit facility (disclosed as \$100 million at the time) and to fund the costs of the offer
 - (ii) the offer was an interim funding solution for ERA with further funding expected to be required by ERA in 2024 for the balance of the required Ranger Project Area rehabilitation expenditure¹⁶¹
- (b) in relation to the 2024 Entitlement Offer:
 - (i) ERA stated the proceeds were expected to provide ERA with sufficient cash to fund planned Ranger Project Area rehabilitation related expenditure up until approximately 3Q27 and fund the costs of the offer
 - (ii) ERA stated it was highly likely that ERA would require more funding around 3Q27, and ERA would consider available funding options for the additional amount before the funds were expected to be required, noting that this may include a further equity raise¹⁶²

¹⁶⁰ Because the implied value of MLN1 based upon market trading is a residual value after allowing for the other assets and liabilities, it necessarily follows that any optionality that is reflected in the ERA share price implicitly forms part of the implied value attributed to MLN1.

¹⁶¹ Source: ERA announcement, *ERA announces \$369 million renounceable entitlements offer*, 4 April 2023.

¹⁶² Source: ERA announcement, *ERA announces approximately \$880 million renounceable entitlement offer*, 29 August 2024.

- (iii) the 2024 Entitlement Offer was announced approximately one month after the Renewal Decision.

237 The resource multiples implied by the two entitlement offers are set out in the table following:

Implied resource multiple – 2023 Interim Entitlement Offer and 2024 Entitlement Offer		
	2023	2024
	\$m	\$m
Theoretical ex-entitlements price (\$ per share)	0.0500	0.0030
Shares on issue post entitlement offer (millions)	22,148	462,235
Theoretical market capitalisation (\$m)	1,107	1,387
Adjustments:		
Net cash, term deposits and Government security balances	(573)	(650)
Rio Tinto bridging facility	100 ⁽¹⁾	-
Capital raising cash – before costs	(369)	(880)
Reported rehabilitation provision (discounted) ⁽²⁾	1,225	2,402
Other non-resource balances	30	21
Implied resource value	1,520	2,280
MLN1 resources (Mlbs) ⁽³⁾	302	302
Resource multiple (A\$/lb)	5.03	7.54

Note:

- 1 Based on the asserted balance drawn down at the time of the 2023 Interim Entitlement Offer.
- 2 No tax deduction on the expected future rehabilitation costs has been reflected within this analysis.
- 3 As reported at the time.

Source: FactSet ERA Annual Report 2022, ERA Annual Report 2023, ERA Interim report 30 June 2024, ERA announcement *ERA announces \$369 million renounceable entitlement offer* 4 April 2023, ERA announcement *Proposed issue of securities*, 4 April 2023, ERA announcement *ERA announces approximately \$880 million renounceable entitlement offer* 29 August 2024, ERA announcement *Proposed issue of new securities* 2 September 2024.

238 LEA notes that the resource multiples implied by the entitlement offers are higher than the resource multiples adopted by SRK on an unencumbered basis. However, in LEA's view, this needs to be considered in the context of the following:

- (a) the stated intention of both the 2023 Interim Entitlement Offer and the 2024 Entitlement Offer was to obtain cash to conduct rehabilitation activities, rather than for the development of MLN1 (or any other tenements held by ERA). The analysis therefore provides a conceptually weak inference of value of MLN1
- (b) the 2023 Interim Entitlement Offer was conducted prior to, and without pricing in the effects of:
 - (i) the material increase in the estimated Ranger Project Area rehabilitation costs that were announced initially to the market in September 2023, with an estimate of the revised provision released in mid-December 2023, and confirmation of the provision in February 2024 resulting in a near-doubling of the provision
 - (ii) the Renewal Decision
- (c) although the 2024 Entitlement Offer was conducted subsequent to the Renewal Decision and with the market having been informed of the material increase in the rehabilitation provision (as set out in the 2023 Annual Report), LEA also notes that

shareholders other than Rio Tinto took up only 5.5% of the shares to which they were entitled as part of the 2024 Entitlement Offer

- (d) the uranium price prior to the 2023 Interim Entitlement Offer was generally in the region of A\$72/lb to A\$78/lb¹⁶³, and the 30 trading days prior to the 2024 Entitlement Offer was in the region of A\$115/lb to A\$130/lb
- (e) the optionality implicit within ERA's share price as discussed at paragraphs 227 to 234
- (f) the two entitlement offers occurred prior to, and do not incorporate any impact from, ERA electing to no longer include MLN1 in its reported mineral resources.

239 Given the above, in LEA's view, implied values of MLN1 arising from the 2023 Interim Entitlement Offer and from the 2024 Entitlement Offer do not provide a reliable indicator of the current market value of MLN1.

Conclusion on value of MLN1

240 Based on the above analysis, in LEA's view, the encumbered value attributed to MLN1 by SRK is reasonable. LEA has therefore adopted the following value range for MLN1:

Value range attributed to MLN1		
	Low \$m	High \$m
Adopted encumbered value ⁽¹⁾	332.2	443.0
Implied multiple of mineral resource (A\$/lb U ₃ O ₈) ⁽²⁾	1.10	1.47

Note:

- 1 LEA notes that whilst we have adopted a range, SRK's single point estimate of the encumbered value lies at the lower end of the range in recognition of the various uncertainties which remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal), ERA's recent write downs of the project value in its financial accounts, the longstanding and intergenerational opposition to the development of Jabiluka by the Mirarr Traditional Owners and the downward trajectory implied by ERA's decision to no longer include MLN1 in its reported mineral resources.
- 2 Value per A\$/lb of resource based on ERA's previously (31 December 2023) reported uranium resource for MLN1 of 302.3 Mlbs.

Source: SRK Report and LEA analysis.

Value of other mineral interests

241 LEA notes that SRK has attributed a value range of \$0.4 million to \$2.0 million to the Cooper Creek JV (ELA 23311 and ELA 23312) and a \$nil value to Ranger 3 Deeps (within EL9644).

Cooper Creek JV (ELA23311 and ELA23312)

242 SRK primarily considered transactions of early to advanced stage uranium exploration assets, without defined mineral resources. SRK's analysis of the implied multiples was based on the reported areal extent of mineral tenure, and are expressed in \$/sqkm terms. The implied transaction multiples were normalised to the U₃O₈ price at the date of SRK's valuation. SRK restricted its considered dataset to mineral assets in the NT.

¹⁶³ 3 January 2023 to 5 April 2023.

- 243 Based on that implied multiple information, SRK estimated the value of ERA's Cooper Creek JV tenures in the table following. As the tenures remain in application, SRK discounted the values to account for the risk that they may not be granted in a timely manner, or have stringent conditions included as part of the grant process, particularly given ELA23311 and ELA23312 are currently in moratorium pending further discussions with Traditional Owners:

SRK attributed values – Cooper Creek JV exploration potential valuation – transactions method					
Tenure	Area valued (sqkm)	Selected multiples (A\$/sqkm)	Market value		
			Lower (A\$m)	Upper (A\$m)	Mid (A\$m)
ELA23311	369.6	500 - 2,500	0.18	0.92	0.55
ELA23312	440.6	500 - 2,500	0.22	1.10	0.66
Total			0.41	2.03	1.22

Source: SRK Report, LEA analysis.

- 244 As a cross-check, SRK also considered the Geoscientific Rating (or modified Kilburn) method, which attempts to quantify the relevant technical aspects of a property through the use of appropriate multipliers (factors) applied to an appropriate base or intrinsic value. SRK has applied its professional judgement and applied a 50% discount to the values associated with the Cooper Creek JV tenures to account for the uncertainty (in both timing and imposed conditions) relating to tenements in application given they remain in moratorium.
- 245 SRK's selected values for ELA23311 and ELA23312, which are set out below, were based on its comparable transaction analysis.

SRK attributed values – Cooper Creek JV exploration potential			
Tenure	Lower (A\$m)	Market value	
		Upper (A\$m)	Mid (A\$m)
ELA23311 and ELA23312	0.4	2.0	1.2

Source: SRK Report, LEA analysis.

Ranger 3 Deeps (ELA9644)

- 246 With specific reference to the Ranger 3 Deeps deposit, SRK noted factors including:

- the period of time which mining and processing operations were authorised under the Section 41 Authority over the Ranger Project Area has now expired and as a result, ERA no longer has the requisite authorisation to conduct exploration, mining and processing activities over this area
- previous economic viability of the Ranger 3 Deeps deposit was dependent on easy access, primarily arising from the Ranger 3 open pit, which is no longer available given the progression of the Ranger Project Area rehabilitation
- the completion of rehabilitation and closure activities at the Ranger Project Area (earthworks currently estimated to be completed in 2035 before entering a prolonged monitoring period to 2060 – subject to closure criteria being achieved in line with currently estimated timeframes) effectively sterilises the Ranger 3 Deeps uranium deposit

- (d) ERA and Rio Tinto remain committed to maintain involvement with the Ranger Project Area (and, by association, ELA9644) throughout the entirety of the rehabilitation and closure period. SRK note that this may, in part, arise due to the potential for reputational damage associated with a disposal of the Ranger Project Areas to other third parties
- (e) the Mirarr Traditional Owners, the NLC and the GAC remain steadfast in their opposition to further exploration, development and mining on their lands
- (f) other stakeholders are likely to strongly oppose any future exploration, development and mining activities on, or in close proximity to, Kakadu National Park
- (g) it seems illogical that upon a return of the Ranger Project Area to its pre-mining condition upon successful rehabilitation and closure activities, either the NT Government or Commonwealth Government would authorise any exploration, development or production relating to uranium from the Ranger 3 Deeps deposit¹⁶⁴.

247 SRK noted that in light of the factors identified, SRK was unable to outline a viable pathway for either the grant of, or subsequent exploration and/or development of EL9644, and as such, SRK considered it no longer had a reasonable basis to assign material value to EL9644. SRK concluded that there is negligible, to no, value associated with EL9644.

Ranger Project Area rehabilitation liability

ERA cost estimates and provisions

- 248 As referenced in Section III, under the Ranger Authority, ERA must rehabilitate the Ranger Project Area to an environment similar to the adjacent areas of the surrounding Kakadu National Park.
- 249 Mine Closure Plans have been prepared annually by ERA with the 2023 plan receiving Commonwealth Ministerial approval on 6 February 2025. The Ranger Project Area rehabilitation costs were estimated by ERA to be some \$3,079 million¹⁶⁵ on an undiscounted, nominal basis as at 31 December 2024. ERA has recognised a provision at 31 December 2024 of \$2,422 million assuming a real (pre-tax) discount rate of 2.5% and assumed inflation rates of 0.6% to 2.5% long term¹⁶⁶. The provision at 28 February 2025 was some \$2,403 million¹⁶⁷ (noting that while this is not an audited etc. figure, it is based upon a roll forward of the same methodology and calculation applied in the determination of the provision as at 31 December 2024).

SRK

- 250 LEA engaged SRK to consider the reasonableness of the cost estimates associated with the current rehabilitation and mine closure plans.
- 251 On 3 February 2025, staff from LEA and SRK attended a site visit of the Ranger Project Area, meeting with Mr Alex Jones (leader of the Ranger Rehabilitation Project) and other

¹⁶⁴ Refer SRK Report Section 7.6 – Valuation of exploration potential – Ranger 3 Deeps. Note that LEA has not presented an exhaustive list of issues identified by SRK.

¹⁶⁵ Excluding any costs attributable to the MLN1 rehabilitation.

¹⁶⁶ ERA recognised a further \$1 million rehabilitation provision for MLN1.

¹⁶⁷ Including \$1 million attributable to MLN1.

ERA/Rio Tinto staff, and discussed the rehabilitation activities generally and more specifically in relation to Pit 3, the Ranger Water Dam, the processing plant, brine concentrator, power station and rehabilitated Pit 1. Via video, staff from LEA and SRK also met with Ms Susan O’Sullivan, legal representative for the Mirarr Traditional Owners.

- 252 SRK also engaged with available Ranger Project Area personnel to better understand the closure planning approach adopted, the forecasting of the cost estimates and how ERA is tracking in relation to the current rehabilitation expenditure. In considering the reasonableness of the cost estimates, SRK reviewed the current available provision model¹⁶⁸ to determine completeness and alignment to the current (2024) Ranger Mine Closure Plan and closure implementation plan. Details on assumptions used within the provision model were referenced in the 2023 Feasibility Reforecast Study Basis of Estimate Report.
- 253 SRK noted that the provision included an estimate for all closure activities with a sound methodology for build of costs outlined in the 2023 Basis of Estimate Report. A risk based range review and contingency analysis was undertaken to understand the uncertainty in the preferred case estimate and closure activities¹⁶⁹, with SRK providing further comments on the following elements:
- (a) unit rates
 - (b) pre-closure water management and monitoring
 - (c) monitoring and maintenance period
 - (d) property holding costs
 - (e) price and schedule contingency
 - (f) closure risks and opportunities.
- 254 SRK concluded that:
- (a) ERA adopting a commercial costing approach rather than a generic liability estimate calculator is a more accurate method and therefore considers that ERA has made the best attempt to understand its liability to the full extent currently possible in the absence of further studies
 - (b) the approach to closure planning and liability estimating has been undertaken in compliance with good industry practice.
- 255 SRK also noted:
- (a) that the Ranger Project Area rehabilitation is an inherently complex project, with future activities beyond 2027 requiring additional studies and ongoing approvals, and that it is likely that the current provision will need to be revised once these studies are complete and additional approvals granted
 - (b) a particular area of uncertainty to SRK involves the formal regulatory approval of certain closure criteria and the mechanisms through which relinquishment can be approved and signed off by both NT and Commonwealth regulators

¹⁶⁸ As at 31 December 2024.

¹⁶⁹ Refer SRK Report, Section 3.4.4 Mine Closure – Cost estimation review.

- (c) SRK considers the schedule outlined for the Ranger Project Area rehabilitation is aligned with the data currently available, and that the schedule aligns with the details of the Tranche 1A (to 3Q27 – Phase 1 demolition, Pit 3 initial and secondary capping and further studies – refer paragraph 100 above) – although also noting that the risks and uncertainties associated with activities and timelines beyond 3Q27 should continually be assessed
- (d) based on SRK’s experience, there is a potential for under estimation of the provisions throughout the entire post-closure monitoring and maintenance period (beyond 2027 to 2060), and that SRK recommends a legal review of the site’s obligations particularly concerning property holding and continued monitoring programs up to December 2060. LEA notes that to the extent that SRK are correct in their view, any amendment would not be material (in present value terms) in the context of the \$2.4 billion provision
- (e) the opportunity for costs to reduce under the MSA, but that budgets and forecasts are currently being assessed.

Adopted value

- 256 As referenced above, in LEA’s view, the appropriate basis upon which to quantify the value of the estimated future Ranger Project Area rehabilitation costs is a DCF methodology, with the best available estimate of the rehabilitation costs discounted to present value terms allowing for the time value of money.
- 257 In LEA’s view, the best available current estimate of the expected future costs of the Ranger Project Area rehabilitation is ERA’s current estimate of the nominal costs, as reflected within ERA’s adopted total rehabilitation provision at 28 February 2025 of \$2,403 million, comprising \$2,402 million for the Ranger Project Area and \$1 million for MLN1. LEA notes that the Ranger Project Area cost estimates have been subject to various studies and reviews, most notably and recently, a 2022 Independent Estimate Review and 2023 Feasibility Reforecast (Tranche 1A) conducted by Bechtel, and the review conducted by SRK for the purposes of this report. The cost estimates are based on the Mine Closure Plans prepared by ERA that are subject to stakeholder review and government approval, with the 2023 Mine Closure Plan having been approved by the Commonwealth Government on 6 February 2025. The rehabilitation provision recognised within ERA’s financial statements are subject to audits and half year reviews by ERA’s auditors (KPMG), and the 31 December 2024 provision is in the process of being audited. In addition, PwC was engaged by ERA to provide an independent review of the reasonableness of the rehabilitation contingencies applied at December 2024. LEA notes that the 28 February 2025 rehabilitation figure adopted is based on ERA’s 31 December 2024 provision adjusted for the expenditure incurred and the effects of time in the present value calculations.
- 258 LEA notes that as at 28 February 2025, yields on 10-year Commonwealth Government bonds were in the region of 4.3% and the yields on 10-year indexed bonds were in the region of 2.1%¹⁷⁰, inferring a broad inflation estimate over the 10-year period of some 2.2%. LEA notes that the adoption a discount rate of 2.1% rather than the 2.5% rate adopted by ERA for the purposes of provisioning estimates does not result in a materially different outcome.

¹⁷⁰ Source: Reserve Bank of Australia *Capital market yields – Government bonds* table F2.

- 259 LEA has also conducted sensitivity analysis of adopting differing values for rehabilitation liabilities in our assessment of “fairness”.

Tax

Tax deduction on future rehabilitation expenditure

- 260 As referenced at paragraph 190, LEA’s assessment of “fair value” requires an assessment of ERA as a whole, and should reflect the synergy benefits that are available to the market as a whole but any special value that may be derived by a particular bidder should not be taken into account.
- 261 Reflecting this, LEA has assumed a tax deduction for future rehabilitation expenditures - to offset Australian taxable income - would be available to a purchaser of 100% of the equity of ERA that is a tax consolidated group or elects to form a consolidated group with ERA¹⁷¹. LEA notes that whether deductions are available would depend on the factual circumstances at the time of such a transaction, the extent and variability of the Australian taxable income generated by the acquirer, and the application of the *Income Tax Assessment Act 1997* (Cth).
- 262 LEA has calculated the present value of the deductions adopting a 30% tax rate and a cost of equity based discount rate. This results in the recognised benefit of the tax deduction being some 80% of the prima facie deduction amount. LEA has also considered scenarios adopting an assumption that a tax deduction is not available on future expected Ranger Project Area rehabilitation expenses.

Existing carry forward tax losses

- 263 LEA has not incorporated any allowance for ERA’s existing carry forward tax losses (which approximated some \$366 million as at 31 December 2024¹⁷²). The law addressing the ability of a company to utilise tax losses are complex but essentially necessitate the subject company maintaining the same majority ownership and control. In the event that there is a change of at least 50% of the ownership or control of a company, the company needs to satisfy the *same business* test, or *similar business* test (which applies to losses in an income year beginning on or after 1 July 2015). In relation to this, LEA notes that upon expiry of the Ranger Authority, ERA’s ability to generate future taxable income to offset the carry forward tax losses is limited to any future development of either MLN1 or any project that may eventuate from one of ERA’s current exploration licences or future projects. In LEA’s view, any net cash flows and taxable income that might arise from any such project and the period of time that is likely to elapse prior to any of these developments coming to fruition are presently not capable of accurate assessment.
- 264 LEA also notes that it is plausible that ERA’s tax losses may be able to be utilised by an acquiring company in forming a tax consolidation group. Again, the rules addressing the ability of an acquiring entity to utilise existing tax losses in forming a tax consolidation group are complex, but in very broad terms, such ability is determined by applying modified versions of the usual tests for deducting and applying losses, being:

¹⁷¹ To the extent that such costs did not form part of the cost of a depreciating asset used to carry out all or part of the works.

¹⁷² Refer paragraph 141.

- (a) the continuity of ownership test – which broadly requires that the joining entity maintained a majority of the same ownership for the period between incurring the loss and just after the joining time (the joining entity must also satisfy the control test¹⁷³) or, if the continuity of ownership or control test is not met:
- (b) the same business test – which requires that the joining entity carry on the same business for at least the 12 months prior to the joining time.

- 265 In circumstances where the transferred losses are able to be utilised, the rate at which those losses can be utilised for an income year is calculated by reference to an available fraction, which is calculated on the basis of the loss entity's modified market value as a fraction of the adjusted market value of the consolidated group.
- 266 Given the above, LEA has attributed no material market value to ERA's historic tax losses as the number of potential purchasers that are capable of acquiring ERA and then able to generate a material benefit from the tax losses in light of the available fraction rules is extremely limited. For the avoidance of doubt, LEA notes that Rio Tinto has stated that if it were to proceed to compulsory acquisition, ERA would join the Rio Tinto Limited tax consolidated group, allowing its unused carry-forward tax losses to be transferred to Rio Tinto. That being said, any value realisable by Rio Tinto from doing so represents special value and should be excluded from our assessment of market value.
- 267 Furthermore, we note that Rio Tinto intends to cancel the transfer of all of ERA's existing tax losses in accordance with s707-145 of the *Income Tax Assessment Act 1997* (Cth), following which those tax losses will not be available for Rio Tinto's use.

Other sundry assets, net working capital balances and employee provisions

- 268 ERA's other sundry assets and working capital balances total an amount to a net liability of some \$13.9 million at 28 February 2025 and comprise:
- (a) **Property, plant and equipment / lease liabilities** – this comprises the ROU asset (the lease on the ERA Darwin office – \$0.3 million as at 28 February 2025) and a corresponding lease payable amount (\$0.3 million at 28 February 2025)
- (b) **Net working capital items** – comprising the following:

ERA – net working capital	31 Dec 24	28 Feb 25
	\$m	\$m
Trade and other receivables	9.1	13.0
Inventories	7.3	7.2
Other assets - Prepayments	1.9	2.7
Trade and other payables	(26.7)	(27.7)
Net working capital / (deficiency)	(8.4)	(4.8)

Source: ERA Annual Report 2024, ERA management and LEA analysis.

¹⁷³ The control test is failed if a person starts to control the entity's voting power, during the period in which the continuity of ownership test is applied.

- (c) **Employee provisions** – comprise current and non-current annual leave and long service leave provisions and a current provision for termination of employment, as set out in the table following:

ERA – employee provisions		
	31 Dec 24	28 Feb 24
	\$m	\$m
Current – annual leave and long service leave	9.0	8.5
Current – termination of employment	0.2	-
Non-current – annual leave and long service leave	0.7	0.7
Total employee provisions	9.9	9.1

Source: ERA Annual Report 2024, ERA management and LEA analysis.

Share capital outstanding

- 269 At the date of this report, ERA had 405,396.2 million fully paid ordinary shares and no other securities on issue.

Valuation summary

- 270 Given the above, we have assessed the value of ERA’s ordinary shares on a 100% controlling interest basis as follows:

ERA shares – valuation summary⁽¹⁾			
	Paragraph	Low \$m	High \$m
Cash and government security receivable	198, 199	1,299.7	1,299.7
MLN1 ⁽²⁾	240	332.2	443.0
Other mineral assets			
– Cooper Creek JV	241	0.4	2.0
– Ranger 3 Deeps	241	-	-
Ranger Project Area rehabilitation liabilities	257	(2,402.8)	(2,402.8)
Tax deduction on future rehabilitation costs	262	576.7	576.7
Existing carry forward tax losses	263	-	-
Other assets, net working capital balances and employee provisions	268	(13.9)	(13.9)
Equity value – controlling interest basis		(207.8)	(95.4)
Ordinary shares outstanding (million)	269	405,396.2	405,396.2
ERA value per share – controlling interest basis (cents)⁽³⁾⁽⁴⁾		(0.0513)	(0.0235)

Note:

- 1 Rounding differences may exist.
- 2 LEA notes that whilst we have adopted a range, SRK’s single point estimate of the encumbered value lies at the lower end of the range in recognition of the various uncertainties which remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal), ERA’s recent write downs of the project value in its financial accounts, the longstanding and intergenerational opposition to the development of Jabiluka by the Mirarr Traditional Owners and the downward trajectory implied by ERA’s decision to no longer report mineral resources at Jabiluka.
- 3 Whilst a purchaser of a minority interest is able to avoid a negative equity outcome (due to ERA being a limited liability company), in LEA’s view, an acquirer of 100% of the equity in ERA will not be able to avoid such outcomes. Accordingly, LEA has not limited the negative equity outcomes to \$nil.
- 4 In the event that LEA’s assumption regarding future tax deductions being available for the Ranger Project Area rehabilitation expenditure to a purchaser of 100% of the equity in ERA is not correct – such that tax deductions are not available to “the market”, then the equity values would reduce further.

Market traded prices

271 In determining the “fair value” of the securities that are the subject of the Compulsory Acquisition, the Corporations Act states an expert must also take into account the prices paid for securities in that class in the previous six months (s667C(2)). It is also conventional for the expert to cross-check their assessed value of the subject company for reasonableness by comparing its assessed value per share with the “undisturbed” listed market prices of the subject company, adjusted for a premium for control.

Previous six months

272 The listed market prices of ERA shares over the six month period preceding this report (22 September 2024 to 21 March 2025) ranged between \$0.002 and \$0.009¹⁷⁴ per share and closed at \$0.002. The VWAP was \$0.0029 per share. ERA’s shares were very thinly traded over the period, with approximately 1% of the issued capital traded, representing an average daily traded value of less than \$40,000.

273 LEA notes the following in respect of this period:

- (a) before the period began, Rio Tinto announced on 29 August 2024 that in the event its interest in ERA increased to over 90% as a result of the 2024 Entitlement Offer, it intended to proceed with the compulsory acquisition of all remaining ERA shares at \$0.002 per share. This intention was confirmed by Rio Tinto on 19 November 2024, when it was known that its interest in ERA had surpassed 90%. Trading during the entirety of the period is therefore, in LEA’s view, influenced (or “disturbed”) by the Compulsory Acquisition
- (b) until approximately 20 November 2024, trading in ERA shares was also affected by the 2024 Entitlement Offer – the shares traded on an ex-entitlement basis but without certainty as to the number of shares to be issued and cash to be raised. After the completion of the 2024 Entitlement Offer (and shortfall bookbuild), ERA shares generally traded in the range of \$0.002 to \$0.003 per share (i.e. within a relatively narrow range that approximated the Proposed Consideration)
- (c) it is not possible to determine the price at which ERA shares may have traded had no mineral resource been reported by ERA for MLN1 during the period (noting that ERA had included MLN1 in its reported mineral resources until 26 March 2025).

274 Having regard to the above, in LEA’s view, trading of ERA shares during this period does not provide a reliable indicator of the “fair” value of ERA shares.

“Undisturbed” traded prices

275 For the purposes of this cross-check, LEA has considered the listed market prices up to the last trading day prior to Rio Tinto announcing on 29 August 2024 that, in the event its interest in ERA increased to over 90% as a result of the 2024 Entitlement Offer, it intended to proceed with the compulsory acquisition of all remaining ERA shares at \$0.002 per share.

¹⁷⁴ Share prices up to and including 17 October 2024 have been adjusted to account for the dilutive impact of the 2024 Entitlement Offer. The high share price of \$0.009 per share occurred on 17 October 2024, being the day subsequent to ERA’s announcement of the resumption of the 2024 Entitlement Offer and release of the Offer Information Booklet.

276 LEA notes that ERA entered a trading halt before the market opened on 26 August 2024. The trading halt continued until around midday on 28 August 2024 upon ERA announcing the results of its market soundings¹⁷⁵, with ERA announcing the 2024 Entitlement Offer on 29 August 2024¹⁷⁶. The last full day of trading prior to the above announcements was 23 August 2024. Not long before this date, a number of other material announcements were made by ERA over three consecutive trading days (26, 29 and 30 July 2024). These included the Renewal Decision, confirmation of the receipt (and subsequent withdrawal) of Boss Energy’s offer for MLN1 and the release of the June 2024 quarter activities report. ERA’s share price declined significantly (approximately 56%) from the closing price on 25 July 2024 to the closing price on 31 July 2024.

277 Given this, we have limited our listed market price analysis to the period 31 July 2024 through to and including 23 August 2024 as presented below:

ERA – unadjusted share prices prior to the 26 August 2024 trading halt						
	Low	High	Close	VWAP	Volume	Value
	\$	\$	\$	\$	000s	\$000
31 Jul 24 to 23 Aug 24	0.014	0.021	0.015	0.0162	70,147	1,138

Source: FactSet.

278 Having regard to the above, LEA has adopted an “undisturbed” price for ERA of some \$0.015 to \$0.0175 per share. LEA notes however, that this range does not take into account the dilutive impact of the 2024 Entitlement Offer. Adjusting the range for both the number of shares issued and the cash proceeds of the 2024 Entitlement Offer results in the following:

ERA shares – adjustment to account for dilutive impact of 2024 Entitlement Offer ⁽¹⁾		
	Low	High
	\$m	\$m
Unadjusted “undisturbed” price (\$)	0.0150	0.0175
Shares on issue as at 23 Aug 24 (million)	22,148	22,148
Capitalised value	332	388
Proceeds from 2024 Entitlement Offer (gross)	766	766
Less costs of 2024 Entitlement Offer	(8)	(8)
Post-money capitalised value	1,091	1,146
Shares on issue post 2024 Entitlement Offer	405,396	405,396
Adjusted “undisturbed” share price (\$)	0.0027	0.0028

Note:

1 Rounding differences may exist.

279 Empirical evidence from research undertaken by LEA indicates that the average premium paid above the listed market priced in successful takeovers in Australia ranges between 30%

¹⁷⁵ In which Rio Tinto indicated that the only terms upon which it would support an equity raise were an \$880 million capital raise for which Rio Tinto would subscribe for its pro-rata entitlement, at \$0.002 per share and the offer being a renounceable entitlement offer – Source: ERA Announcement, *Results of Market Soundings* 28 August 2024.

¹⁷⁶ Which included Rio Tinto’s stated intent to proceed with compulsory acquisition of all remaining ERA shares under Part 6A.2 of the Corporations Act and to offer a price of \$0.002 per ERA share.

and 35% (assuming the pre-bid market price does not reflect any speculation of the takeover)¹⁷⁷.

- 280 LEA notes, however, that during this trading period Rio Tinto held some 86.3% of the shares in ERA and as a result, a large element of any control premium is likely to be already priced in to ERA shares. Accordingly, LEA has not adjusted the “undisturbed” price.
- 281 LEA also notes that from 23 August 2024 to 21 March 2025, the spot price of uranium decreased from approximately A\$120/lb to A\$103/lb, a decrease of some 14%. Although a direct correlation between the spot price of uranium and the ERA share price would not be expected, in LEA’s view, it would be reasonable to expect that the ERA share price would decline as a result of a reduced uranium spot price over this period. LEA notes the share price movements of the listed peer companies referenced by SRK in their analysis over this period have varied between a decrease of some 21% for Toro Energy Limited to an increase of some 50% for Berkley Energia Limited, with a simple average share price increase of some 5%¹⁷⁸.
- 282 LEA also notes that subsequent to 23 August 2024, ERA incurred net operating cash outflows principally arising from the Ranger Project Area rehabilitation work. LEA has estimated this net operating cash outflow at some \$101 million to 28 February 2025 (some \$0.0002 per share) and some \$113 million to 21 March 2025 (some \$0.0003 per share)¹⁷⁹.
- 283 Adjusting the above “undisturbed” (adjusted) prices for a decrease of say 10%, and the estimated cash burn of \$113 million (or some \$0.0003 per share), results in an indicated share price of some \$0.0022 per share¹⁸⁰, which takes into account the Renewal Decision, the dilutive impact of the 2024 Entitlement Offer and adjusts for the decline in the spot price of uranium and estimated cash burn through to the date of this report.
- 284 LEA notes that this value exceeds our assessed per share value range at paragraph 270. In relation to this, LEA notes the following:
- (a) ERA is a thinly traded stock and the period reviewed relatively short
 - (b) as previously discussed from paragraph 227, in LEA’s view, the share price of ERA is likely to include an optionality element

¹⁷⁷ LEA has analysed the control premiums paid in successful change of control transactions involving cash consideration in Australia over the period January 2000 to December 2024. LEA’s study covered over 500 transactions in all sectors excluding real estate investment trusts and listed investment companies, based on data sourced from Bloomberg, FactSet, Connect4, and ASX company announcements. Scrip transactions were excluded from the analysis because the value of the scrip consideration can vary materially depending on the date of measurement. Negative premiums and outliers (premiums over 60%) were also excluded.

¹⁷⁸ ASX prices are adopted where the company is listed on multiple exchanges. Source: FactSet. LEA notes that given the relatively early stage of development the companies that SRK has referenced, the share price movements of individual companies are volatile and more likely to be the product of company specific factors (such as drilling results, approvals and the like) rather than movements in the spot price of uranium price, and as such, little inference can be obtained from such share price movements in establishing how ERA shares may have otherwise traded over this period.

¹⁷⁹ Based on ERA’s operating cash flow for the quarters ended 30 September 2024 and 31 December 2024, pro-rata adjusted over the period. Source: ERA Appendix 4C Quarterly cash flow report for the quarters ended 30 September 2024 and 31 December 2024.

¹⁸⁰ \$0.00023 calculated based on cash burn to 28 February 2025.

- (c) ERA continued to include MLN1 in its reported mineral resources until 26 March 2025. It is not possible to determine the impact this may have had on the “undisturbed” (adjusted) price.

285 Having regard to the above in LEA’s view, the “undisturbed” market traded prices do not form a reliable basis upon which to consider the value of ERA shares on a 100% controlling interest basis.

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A Financial Services Guide

Lonergan Edwards & Associates Limited

- 1 Lonergan Edwards & Associates Limited (ABN 53 095 445 560) (LEA) is a specialist valuation firm which provides valuation advice, valuation reports and independent expert's reports (IER) in relation to takeovers and mergers, commercial litigation, tax and stamp duty matters, assessments of economic loss, commercial and regulatory disputes.
- 2 LEA holds Australian Financial Services Licence No. 246532, which authorises it to provide a broad range of financial services to retail and wholesale clients, including providing financial product advice in relation to various financial products such as securities, derivatives, interests in managed investment schemes, superannuation products, debentures, stocks and bonds.

Financial Services Guide

- 3 LEA has been engaged by North Limited to provide general financial product advice in the form of an IER in relation to the Compulsory Acquisition. The *Corporations Act 2001* (Cth) (Corporations Act) requires that LEA include this Financial Services Guide (FSG) with our IER.
- 4 This FSG is designed to assist retail clients in their use of the general financial product advice contained in the IER. This FSG contains information about LEA generally, the financial services we are licensed to provide, the remuneration we may receive in connection with the preparation of the IER, and if complaints against us ever arise how they will be dealt with.

General financial product advice

- 5 The IER contains general financial product advice only and has been prepared without taking into account the personal objectives, financial situations or needs of individual ERA shareholders. ERA shareholders should consider their own objectives, financial situation and needs when assessing the suitability of the IER to their situation. ERA shareholders may wish to obtain personal financial product advice from the holder of an Australian Financial Services Licence to assist them in this assessment.

Fees, commissions and other benefits we may receive

- 6 LEA charges fees to produce reports, including this IER. These fees are negotiated and agreed with the entity who engages LEA to provide a report. Fees are charged on an hourly basis or as a fixed amount depending on the terms of the agreement with the entity who engages us. LEA is entitled to receive a fee of approximately \$400,000 plus GST for the preparation of this IER.
- 7 Neither LEA nor its directors and officers receives any commissions or other benefits, except for the fees for services referred to above.
- 8 All of our employees receive a salary. Our employees are eligible for bonuses based on overall performance and the firm's profitability, and do not receive any commissions or other benefits arising directly from services provided to our clients. The remuneration paid to our

Appendix A

directors reflects their individual contribution to the company and covers all aspects of performance. Our directors do not receive any commissions or other benefits arising directly from services provided to our clients.

- 9 We do not pay commissions or provide other benefits to other parties for referring prospective clients to us.

Complaints

- 10 If you have a complaint, please raise it with us first. LEA can be contacted by sending a letter to the following address:

Level 7
64 Castlereagh Street
Sydney NSW 2000

- 11 We will endeavour to satisfactorily resolve your complaint in a timely manner. Please note that LEA is only responsible for the preparation of this IER. Complaints or questions about the Compulsory Acquisition Notice should not be directed toward LEA as it is not responsible for the preparation of this document.
- 12 If we are not able to resolve your complaint to your satisfaction within 30 days of your written notification, you are entitled to have your matter referred to the Australian Financial Complaints Authority (AFCA), an external complaints resolution service. You will not be charged for using the AFCA service.

Compensation arrangements

- 13 LEA has professional indemnity insurance cover under its professional indemnity insurance policy. This policy meets the compensation arrangement requirements of the Corporations Act.

Appendix B

B Qualifications and declarations

Qualifications

- 1 LEA is a licensed investment adviser under the Corporations Act. LEA's authorised representatives have extensive experience in the field of corporate finance, particularly in relation to the valuation of shares and businesses and have prepared hundreds of IERs.
- 2 This report was prepared by Mr Grant Kepler and Mr Nathan Toscan, who are each authorised representatives of LEA. Mr Kepler and Mr Toscan have over 28 years' and 23 years' experience respectively in the provision of valuation advice (and related advisory services).

Declarations

- 3 This report has been prepared at the request of North Limited to accompany the Compulsory Acquisition Notice. It is not intended that this report should serve any purpose other than as an expression of our opinion as to whether the proposed terms of the Compulsory Acquisition Notice give a "fair value" for the securities (i.e. whether the Proposed Consideration is "fair").

Interests

- 4 At the date of this report, neither LEA, Mr Kepler nor Mr Toscan have any interest in the outcome of the Compulsory Acquisition. With the exception of the fee shown in Appendix A, LEA will not receive any other benefits, either directly or indirectly, for, or in connection with the preparation of this report.
- 5 LEA has not had within the previous two years, any business or professional relationship with Rio Tinto (including North Limited or Peko-Wallsend) or ERA or any financial or other interest that could reasonably be regarded as capable of affecting its ability to provide an unbiased opinion in relation to the Compulsory Acquisition.
- 6 We have considered the matters described in ASIC RG 112 – *Independence of experts*, and consider that there are no circumstances that, in our view, would constitute a conflict of interest or would impair our ability to provide objective independent assistance in this engagement.
- 7 LEA has had no part in the formulation of the Compulsory Acquisition. Its only role has been the preparation of this report.

Indemnification

- 8 As a condition of LEA's agreement to prepare this report, Rio Tinto (including North Limited) has agreed to indemnify LEA in relation to any claim arising from, or in connection with its reliance on information or documentation provided by or on behalf of Rio Tinto which is false or misleading or omits material particulars or arising from any failure to supply relevant documents or information.

Appendix B

Consents

- 9 LEA consents to this report (including its annexures) accompanying the Compulsory Acquisition Notice, as well as the form and context in which it is referenced in the Compulsory Acquisition Notice. Apart from such use, neither the whole nor any part of this report, nor any reference thereto may be included in or with, or attached to any document, circular resolution, statement or letter without the prior written consent of LEA.

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C Valuation methodologies

- 1 RG 111 outlines the appropriate methodologies that a valuer should consider when valuing assets or securities for the purposes of, amongst other things, schemes of arrangement, takeovers, share buy-backs, selective capital reductions and prospectuses. These include:
- (a) the DCF methodology
 - (b) the application of earnings multiples appropriate to the businesses or industries in which the company or its profit centres are engaged, to the estimated future maintainable earnings or cash flows of the company, added to the estimated realisable value of any surplus assets
 - (c) the amount that would be available for distribution to shareholders in an orderly realisation of assets
 - (d) the quoted price of listed securities, when there is a liquid and active market and allowing for the fact that the quoted market price may not reflect their value on a 100% controlling interest basis
 - (e) any recent genuine offers received by the target for any business units or assets as a basis for valuation of those business units or assets.
- 2 Under the DCF methodology the value of the business is equal to the net present value of the estimated future cash flows including a terminal value. In order to arrive at the net present value the future cash flows are discounted using a discount rate which reflects the risks associated with the cash flow stream.
- 3 Methodologies using capitalisation multiples of earnings or cash flows are commonly applied when valuing businesses where a future “maintainable” earnings stream can be established with a degree of confidence. Generally, this applies in circumstances where the business is relatively mature, has a proven track record and expectations of future profitability and has relatively steady growth prospects. Such a methodology is generally not applicable where a business is in start-up phase, has a finite life, or is likely to experience a significant change in growth prospects and risks in the future.
- 4 Capitalisation multiples can be applied to either estimates of future maintainable operating cash flow, earnings before interest, tax, depreciation and amortisation (EBITDA), earnings before interest, tax and amortisation (EBITA), earnings before interest and tax (EBIT) or net profit after tax. The appropriate multiple to be applied to such earnings is usually derived from stock market trading in shares in comparable companies which provide some guidance as to value and from precedent transactions within the industry. The multiples derived from these sources need to be reviewed in the context of the differing profiles and growth prospects between the company being valued and those considered comparable. When valuing controlling interests in a business an adjustment is also required to incorporate a premium for control. The earnings from any non-trading or surplus assets are excluded from the estimate of the maintainable earnings and the value of such assets is separately added to the value of the business in order to derive the total value of the company.

Appendix C

5

An asset based methodology is applicable in circumstances where neither a capitalisation of earnings nor a DCF methodology is appropriate. It can also be applied where a business is no longer a going concern or where an orderly realisation of assets and distribution of the proceeds is proposed. Using this methodology, the value of the net assets of the company are adjusted for the time, cost and taxation consequences of realising the company's assets.

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D Glossary

Term	Meaning
\$/lb	Dollars per pound
2022 Feasibility Study	Ranger Project Area rehabilitation execution scope, risks, cost and schedule dated May 2022
2023 Interim Entitlement Offer	Non-underwritten, renounceable entitlement offer which aimed to raise approximately \$300 million announced by ERA on 4 April 2023
2024 Entitlement Offer	19.87-for-1 non-underwritten pro-rata renounceable entitlement offer announced by the Company on 29 August 2024
Aboriginal Land Rights Act	<i>Aboriginal Land Rights (Northern Territory) Act 1976</i> (Cth)
AFCA	Australian Financial Complaints Authority
Annual Plan of Rehabilitation	Annual plan of rehabilitation for the Ranger Project Area submitted by ERA to the Commonwealth Government in relation to management of the Security Deposits
ASIC	Australian Securities & Investments Commission
ASX	Australian Securities Exchange
Atomic Energy Act	<i>Atomic Energy Act 1953</i> (Cth)
Bechtel	Bechtel (Western Australia) Pty Ltd
Boss Energy	Boss Energy Limited
Cameco	Cameco Corporation
CDA	UK-US Combined Development Agency
Compulsory Acquisition	The compulsory acquisition by Rio Tinto of all remaining ERA ordinary shares that it does not already own for \$0.002 per share
Compulsory Acquisition Notice	Notice of compulsory acquisition issued by North Limited for the purposes of the Compulsory Acquisition
Cooper Creek JV	Cooper Creek Joint Venture Project
Corporations Act	<i>Corporations Act 2001</i> (Cth)
Corporations Regulations	<i>Corporations Regulations 2001</i>
cps	Cents per share
DCF	Discounted cash flow
Denison	Denison Mines Corp
DISR	Commonwealth Department of Industry, Science and Resource
EBIT	Earnings before interest and tax
EBITA	Earnings before interest, tax and amortisation of acquired intangibles
EBITDA	Earnings before interest, tax depreciation and amortisation
EIS	Environmental Impact Statement
ER	Environmental Requirements
ERA / the Company	Energy Resources of Australia Limited
ERISS	Environmental Research Institute of the Supervising Scientist
Four Mile	Quasar Resources Ltd's Four Mile uranium mine in South Australia
FSG	Financial Services Guide
FY	Financial year
GAC	Gundjehmi Aboriginal Corporation (on behalf of the Mirarr Traditional Owners)
GEMIS	NT Government Geoscience Exploration and Mining Information System
Government Agreement as Amended	Government Agreement as Amended is annexed to the Ranger Uranium Project Deed of Assignment – Commonwealth of Australia and Australian Atomic Energy Commission to Energy Resources of Australia dated 12 September 1980
Grant Thornton	Grant Thornton Corporate Finance Pty Ltd

Appendix D

Term	Meaning
GW	Gigawatt
Honeymoon	Boss Energy's Honeymoon uranium mine in South Australia
IAEA	International Atomic Energy Agency
IER	Independent expert's report
ISL	In-situ leaching
JORC Code	Australasian Joint Ore Reserves Committee Code
km	Kilometre
LEA	LonerGAN Edwards & Associates Limited
Mlb	Million pounds
MLN1 / Jabiluka	Mining lease Northern 1 on which the Jabiluka uranium deposit is located
MSA	Management Services Agreement between ERA and Rio Tinto for the management of the Ranger Rehabilitation Project dated April 2024
Mt	Million tonnes
NexGen	NexGen Energy Ltd
NLC	Northern Land Council
NT	Northern Territory
Olympic Dam	BHP Group Ltd's Olympic Dam uranium mine in South Australia
OSS	Office of the Supervising Scientist
Packer & Co	Packer & Co Ltd
Pancontinental	Pancontinental Energy NL
Peko-Wallsend	Peko-Wallsend Pty Ltd
PP&E	Property, plant and equipment
Proposed Consideration	\$0.002 per ERA share
Ranger 3 Deeps	the Ranger 3 Deeps deposit within the Ranger Project Area
Ranger Authorisation	Ranger Authorisation 0108-18 under Deemed Mining Licence DML0108-18
Ranger Project Area	The 79 sqkm Ranger mine project area located 8 km east of Jabiru and 260 km east of Darwin in the NT
Renewal Decision	NT Government announcement that MLN1 would not be renewed dated 26 July 2024
Respondents	Collectively, the Commonwealth Minister for Resources and Minister for Northern Australia, the Commonwealth of Australia, the NT Minister for Mining and Minister for Agribusiness and Fisheries, the Northern Territory, and the Jabiluka Aboriginal Land Trust
RG 10	ASIC Regulatory Guide 10 – <i>Compulsory acquisitions and buyouts</i>
RG 111	ASIC Regulatory Guide 111 – <i>Content of expert reports</i>
Rio Tinto	Rio Tinto Limited
ROU	Right of use
Section 41 Authority	Authorisation granted to ERA to access and conduct activities on the Ranger Project Area pursuant to s41 of the Atomic Energy Act
sqkm	Square kilometre
SRK	SRK Consulting Australasia Pty Ltd
SRK Report	Independent Specialist Report prepared by SRK dated 31 March 2025
Trust Fund	Security deposits held by ERA in accordance with the Government Agreement as Amended to provide security against the immediate estimated costs of closing and rehabilitating the Ranger Project Area
TWh	Terawatt hour
UK	United Kingdom
UKAEA	United Kingdom Atomic Energy Authority
US	United States of America
VALMIN Code	Australasian Code for Public Reporting of Technical Assessments and Valuation of Mineral Assets (2015 Edition)

Appendix D

Term	Meaning
VWAP	Volume weighted average price
WANOS	Weighted average number of shares outstanding
Zentree	Zentree Investments Ltd

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Final

Independent Specialist Report – Mineral Assets of Energy Resources of Australia Ltd

Ranger, Jabiluka and Cooper Creek JV, Northern Territory, Australia
Lonergan Edwards & Associates



SRK Consulting (Australasia) Pty Ltd ■ LED001 ■ 2 April 2025

Final

Independent Specialist Report – Mineral Assets of Energy Resources of Australia Ltd

Ranger, Jabiluka and Cooper Creek JV, Northern Territory, Australia

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Cover Image:

Pit 1 at final landform on right RP2 in centre and Pit 3 behind RP2 – Ranger Rehabilitation Project – source: ERA Mine Closure Plan 2023

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Acknowledgments

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Disclaimer: The opinions expressed in this Report have been based on the information supplied to SRK Consulting (Australasia) Pty Ltd (SRK) by Rio Tinto Limited (Rio Tinto)/Energy Resources of Australia Ltd (ERA). The opinions in this Report are provided in response to a specific request from Rio Tinto and ERA to do so. SRK has exercised all due care in reviewing the supplied information. While SRK has compared key supplied data with expected values, the accuracy of the results and conclusions from the review are entirely reliant on the accuracy and completeness of the supplied data. SRK does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this Report apply to the site conditions and features as they existed at the time of SRK's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which SRK had no prior knowledge nor had the opportunity to evaluate.

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Useful Definitions

This list contains definitions of symbols, units, abbreviations, and terminology that may be unfamiliar to the reader.

°C	degrees Celsius
µm or um	micrometres
A\$	Australian dollars
AAEC	Australian Atomic Energy Commission
AAS	atomic absorption spectroscopy
AHC	Australian Heritage Commission
AIG	Australian Institute of Geoscientists
AMC	AMC Consultants Pty Ltd
Anticline	A '∩' shaped fold or structure in stratified rocks with the oldest rocks in the centre
ARCM	Audit and Risk Committee Memorandum
ARRTC	Alligator Rivers Region Technical Committee
ASIC	Australian Securities and Investments Commission
ASX	Australian Securities Exchange
AusIMM	Australasian Institute of Mining and Metallurgy
BAC	base acquisition cost
Basin	A general region with an overall history of subsidence and thick sedimentary accumulation
Bn	billion
BOE	2023 Reforecast Basis of Estimate
C&M	care and maintenance
Ca	calcium
Cameco	Cameco Australia Pty Ltd
CCD	counter current decantation
Company	Energy Resources of Australia Limited
Corporations Act	<i>Corporations Act 2001 (Cth)</i>
Cth	Commonwealth
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DCF	discounted cashflow
DD	diamond drilling
Deposit	An anomalous occurrence of a specific mineral or minerals within the Earth's crust
DFS	Definitive Feasibility Study
DITT	Northern Territory Department of Industry, Tourism and Trade
DME	Northern Territory Department of Mines and Energy
Drill core	A solid, cylindrical sample of rock produced by diamond drilling
EIS	Environmental Impact Study
EL	exploration licence
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ERA	Energy Resources of Australia Ltd

ERISS	Environmental Research Institute of the Supervising Scientist
EZ	Electrolytic Zinc Company of Australasia Limited
Fault	A fracture or a fracture zone along which there has been displacement of the two sides relative to one another parallel to the fracture. The displacement may be a few millimetres or many kilometres.
FEED	front-end engineering design
FID	financial investment decisions
FS	Feasibility Study
FS BOE	2023 Feasibility Study Basis of estimate
FWS	Footwall Sequence
g/t	grams per tonne
GAC	Gundjehmi Aboriginal Corporation
Geophysical data	Data from the branch of geology that studies the physics of the Earth, using the physical principles underlying such phenomena as seismic waves, heat flow, gravity, and magnetism.
GLpa	gigalitres per annum
ha	hectares
HWS	Hanging Wall Sequence
IBC	Independent Board Committee of ERA
IER	Independent Experts Report
ISL	in situ leach
ISR	Independent Specialist Report
IVSC	International Valuation Standards Committee
JMA	Jabiluka Mill Alternative
JORC Code	Australasian Code for the reporting of Exploration Results, Mineral Resources and Ore Reserves – the JORC Code 2012 edition
JV	joint venture
k	thousands
KKN	Key Knowledge Need
km ²	square kilometres
koz	kilo or thousand ounces
lb	pounds
LEA	Lonergan Edwards & Associates
LMS	Lower Mine Sequence
LOM	life-of-mine
LTCMA	Long-Term Care and Maintenance Agreement dated 25 February 2005 between Mirarr Gundjehmi Aboriginal People, Energy Resources of Australia and the Northern Land Council on the long-term management of the Jabiluka lease area.
m	metres
M	millions
m ³ /s	cubic metres per second
Ma	millions of years old
MCP	Mine Closure Plan
MEE	multiples of exploration expenditure

ML	mineral lease
Mlb	million pounds
MLN	Mineral Lease North
mm	millimetres
MRE	Mineral Resource Estimate
MSA	Management Services Agreement
Mt	million tonnes
MTC	Minesite Technical Committee
Mtpa	million tonnes per annum
NBIO	non-binding indicative offer
NLC	Northern Land Council, a registered Native Title Body
North	North Limited
NT	Northern Territory, Australia
OoM	Order of Magnitude
Pancontinental	Pancontinental Mining Limited
Peko	Peko-Wallsend Operations Ltd
PER	Public Environment Report
PFS	Pre-feasibility Study
PGE	platinum group elements
PLS	Paterson Lake South
ppm	parts per million
QAQC	quality assurance and quality control
R3D	Ranger 3 Deeps
RG111	Regulatory Guide 111 Contents of expert reports
RICS	Royal Institution of Chartered Surveyors
Rio Tinto	Rio Tinto Limited, as the ultimate parent of North Limited
RMA	Ranger Mill Alternative
RPA	Ranger Project Area
RPEEE	reasonable prospects for eventual economic extraction
RRP	Ranger Rehabilitation Project
RWD	Ranger Water Dam
S&P Capital IQ Pro	A global intelligence database platform – https://www.capitaliq.spglobal.com/
SAG	semi-autogenous grind
SAL	Stratigraphic Assay Level
SRK	SRK Consulting (Australasia) Pty Ltd
SSB	Supervising Scientific Branch
Sutton	Sutton Motors Pty Ltd
SX	solvent extraction
Syncline	A 'U'-shaped fold or structure in stratified rocks, with youngest rocks in the centre.
t	tonnes

t/m ³	tonnes per cubic metre
TLF	Trial Landform
Trench	The excavation of a horizontally elongate pit (trench), typically up to 2 m deep and up to 1.5 m wide in order to access fresh or weathered bedrock and take channel samples across a mineralised structure. The trench is normally orientated such that samples taken along the longest wall are perpendicular to the mineralised structure.
U ₃ O ₈	uranium oxide
UMS	Upper Mine Sequence
US\$	United States dollars
VALMIN	Australasian Code for Public Reporting of Technical Assessments and Valuations of Mineral Assets 2015 – The VALMIN Code 2015 edition
WRI	Wage Rate Index
XRF	x-ray fluorescence

Executive Summary

This independent technical assessment and mineral asset valuation of Energy Resources of Australia Limited's (ERA's) mineral assets concludes:

- The unencumbered value for ERA's mineral assets lies in the range of A\$816.5 M to A\$1,039.6 M, with a preferred value of A\$928.1 M.
- The encumbered value of a 100% interest in ERA's mineral assets resides between A\$332.6 M and A\$445.0 M, with a preferred value of A\$333.0 M.
- This value range and positioning reflects that ERA no longer reports any Mineral Resources or Ore Reserves at Ranger or Jabiluka along with the various uncertainties that remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal and the longstanding and intergenerational opposition to the development of Jabiluka by Traditional Owner groups).
- In assigning its valuation range, SRK has endeavoured to keep its valuation range as tight as possible. SRK is cognisant that, should the pending legal action find against ERA, the value of Jabiluka may fall to nil.

Context

SRK Consulting (Australasia) Pty Ltd (SRK) understands that Lonergan Edwards & Associates (LEA) has been engaged by North Limited, a wholly owned subsidiary of Rio Tinto Limited (Rio Tinto or the Company) to prepare an Independent Experts Report (IER) in relation to the proposed compulsory acquisition of all remaining shares in ERA that Rio Tinto does not already own.

LEA subsequently contacted SRK to provide an Independent Specialist Report (ISR) incorporating a technical assessment and valuation of ERA's mineral assets to accompany its IER. The IER and ISR may be referred to or extracted in whole or in part (with the consent of the relevant author), in materials released to the Australian Securities Exchange (ASX) and/or distributed to ERA shareholders.

SRK's ISR has been prepared in accordance with the guidelines outlined in the *Australasian Code for Public Reporting of Technical Assessments and Valuations of Mineral Assets* (VALMIN Code, 2015), which incorporates the *Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves* (JORC Code, 2012).

About ERA

ERA is an ASX listed company that operates the Ranger uranium mine (now being rehabilitated) and holds the Jabiluka Mineral Lease (ML) near Jabiru and surrounded by the Kakadu National Park in Australia's Northern Territory (NT). In addition, the Company has lodged applications for two exploration licences (ELAs) located outside and to the north of the Kakadu National Park boundaries.

ERA's projects range from exploration to post-production (rehabilitation and mine closure) assets, with defined and publicly reported JORC Code (2012) Mineral Resources at Jabiluka.

Ranger

The Ranger Project Area (RPA) has been extensively mined previously with last production in 2021. It is currently the focus of mine rehabilitation and closure activities, with predicted completion

of the final constructed landform around September 2035. Monitoring of rehabilitation outcomes is expected to continue until at least early 2061. The forecast date for substantial completion of the final landform is later than the date currently allowed for under the 'Section 41 Authority' issued under the *Atomic Energy Act 1953*. An amended Act (the *Atomic Energy Amendment (Mine Rehabilitation and Closure) Act 2022*) was passed in November 2022. Following the promulgation of the amended Act, ERA applied for a new Authority (a 'Rehabilitation Authority' as defined in Section 41CA of the amended Atomic Energy Act) on 27 May 2024. As at the date of this report, no replacement Authority had been approved by the Commonwealth.

Based on its review of the key aspects relating to the RPA, SRK notes the following:

■ **Mine Closure**

– **Context**

- According to ERA's 2024 Mine Closure Plan (MCP), the two primary goals of closure at Ranger are to rehabilitate the disturbed areas of the RPA and to establish an environment within the RPA that is i) similar to adjacent areas of Kakadu National Park; and ii) consistent with the wishes of the Mirarr People.
- The total area of disturbance in the RPA to be rehabilitated is approximately 1,060 ha.
- No part of the former RPA has yet been fully rehabilitated and relinquished.
- ERA has adopted placement of a subaerial cover as its preferred cover option at Pit 3. Approval of the initial work for the Pit 3 capping (placement of geotextile and waste rock cover) was granted in August 2024 and works commenced in December 2024.
- ERA's current plan is to decommission, demolish and rehabilitate the Ranger processing facility. No formal application to demolish and rehabilitate the processing plant infrastructure has yet been lodged by ERA or approved by the federal Minister.

– **Costing estimates**

- The current preliminary estimate in discounted real terms for the remaining rehabilitation work, as of 31 December 2024, is A\$2,422 M, documented in the ERA Audit and Risk Committee (ARC) memorandum dated 10 February 2025. The total completed spend to date on the project is A\$909 M.
- The Ranger closure liability assessments were derived via a commercial costing approach, as opposed to using a generic liability estimate calculator. SRK regards this commercial costing as being the more accurate of the approaches and therefore considers the operation understands its liability as much as is currently possible in the absence of further studies (which have been proposed to be undertaken near term).

– **SRK's findings**

- The approach to closure planning and liability estimating, as adopted at the RPA and its operations, has been undertaken in compliance with good industry practice. What remains uncertain is the formal approval of completion criteria and the mechanisms through which relinquishment can be approved and signed off by regulators.
- The schedule outlined for the RPA is aligned with the data made available. The schedule aligns well with the details of Tranche 1A up to the end of 2027. However, the risks and uncertainties associated with activities and timelines beyond Tranche 1A should be assessed. ERA is currently undertaking further studies to better understand

and close existing knowledge gaps regarding future tranche activities, and the outcomes of these studies will better refine the schedule and provision going forward.

- There is potential for underestimation of the provision due to activities not extending throughout the entire post-closure monitoring and maintenance period. SRK recommends legal review of the site's obligations, particularly concerning property holding and continued monitoring programs up to the estimated close out certification date of December 2060.

■ Mineral Resources

- There are no Mineral Resources or Ore Reserves reported within the RPA (including the Ranger 3 Deeps or RD3 deposit).
- The R3D deposit is currently considered to have minimal options regarding future development and hence negligible value can be reasonably ascribed to this deposit.

Jabiluka

Jabiluka has previously been evaluated by various technical studies (most recently to Order of Magnitude – OoM – level, as updated in 2011). Assurances have previously been given by the Company to Traditional Owners that development of Jabiluka would not proceed without the Traditional Owner's full approval. This reassurance was reiterated in recent public documents, including ERA's 2023 Annual Report (as disclosed to the ASX in March 2024) and ERA's preliminary Final Report (as disclosed to the ASX in February 2025).

SRK notes the following based on its review of the key aspects relating to the Jabiluka Project:

■ Recent tenure events

- ERA sought an extension to mining lease MLN1 (which was due to expire on 11 August 2024) on 20 March 2024.
- On 26 July 2024, the Northern Territory Minister formally declined to renew this tenure. An initial application for judicial review was lodged by ERA with the Federal Court of Australia on 6 August 2024, with subsequent interlocutory and other applications lodged starting in October 2024. The matter is currently due to be heard in the Federal Court starting in mid-May 2025.
- On 5 June 2024 (prior to the NT Minister's decision on the lease renewal of MLN1), a general reservation of land was proclaimed under the NT *Mineral Titles Act 2010*. The effect of this land reservation will be to cause land within the boundaries of MLN1 to be prohibited for future use for mining or exploration activities (by ERA or any other entity) once MLN1 ceases to be in force. It is SRK's understanding that ERA's tenure over MLN1 will not formally be resolved until after the Federal Court issues its judgment on the Minister's refusal to extend tenure.
- In the event that MLN1 is forfeited, other agreements such as the Jabiluka Long Term Care and Maintenance Agreement (LTCMA) with the Northern Land Council (NLC) and the Traditional Owners of the Jabiluka area will also expire.
- In accordance with the LTCMA, as signed by these parties on 25 February 2005, the Jabiluka deposit will not be developed by ERA without the approval of the Mirarr Traditional Owners.

■ Mineral Resources

- For personal use only
- No Ore Reserves or Mineral Resources are presently defined.
 - Until 31 December 2024 (as reported to the ASX on 26 March 2025), ERA estimated the Jabiluka Project contained Measured, Indicated and Inferred Mineral Resources of approximately 302.3 Mlb U₃O₈ at an average grade of 0.55% U₃O₈, which was among the largest, high-grade (+0.25% U₃O₈) uranium deposits in the world.
 - The Jabiluka II deposit remains open along strike and at depth to the south and east.
 - The Jabiluka deposit is currently considered to have limited options regarding a pathway to future production and hence negligible value can be reasonably ascribed to this deposit.
- **Technical studies**
- Various studies have been completed to investigate the development of the Jabiluka Project over a period of almost 20 years. Previous techno-economic studies (most recently at OoM level in 2011) at Jabiluka envisaged it to be developed by underground mining methods (open stoping incorporating backfill of the stopes with cemented paste fill and access via a conventional decline), with a comparatively small footprint relative to the former Ranger open pit mining operation.
 - Notwithstanding the high uranium grade, significant tonnage, and there being no technical obstacles to the potential recovery of a saleable product, the Jabiluka metallurgical testwork, processing flowsheet selection, proposed plant location and the associated capital and operating cost estimates are currently not sufficiently advanced to be considered at a pre-feasibility study (PFS) level of confidence. As a result, the Jabiluka Project cannot be valued on a discounted cashflow (DCF) basis.
 - Otherwise, there is a good degree of confidence in the amenability to treat the Jabiluka underground deposit using a conventional process in line with the former Ranger processing facility and the ability to produce a saleable uranium product with high metallurgical recoveries. No material technical related processing risks have been identified to date that would restrict the ability to process this material.
- **Development consents:** Any future mining at Jabiluka is unlikely to be able to rely on environmental consents granted on the basis of technical studies and environmental impact assessments completed in 1997. The time required for territory and federal impact assessments is not fixed in statute, but could be expected to take in the order of 6 years, assuming the assessments are conducted under the bilateral assessment process between the NT and Commonwealth governments. Subordinate approvals would be required before the commencement of on-ground works and these could reasonably be expected to take up to 2 years to secure.
- **Mine closure:** A mine closure plan (MCP) for Jabiluka (MLN1) was completed by consulting firm, 2 Rog Pty Ltd on behalf of ERA on 19 June 2024. A series of rehabilitation criteria status reports were appended to the MCP. These generally concluded that the condition of land at MLN1 met the rehabilitation performance criteria proposed for the Jabiluka project area.

Cooper Creek JV

ERA is party to the Cooper Creek JV agreement which relates to two exploration licence applications covering 810.24 km² approximately 65 km northwest of the RPA in northwest Arnhem Land. The tenements are located entirely within Aboriginal freehold land and remain in the early stages of assessment pending lifting of a moratorium relating to Native Title.

Valuation

Mandate

LEA has issued SRK with the following instruction:

In light of the change made by ERA to no longer recognise a Mineral Resource for MLN1, can you please provide:

- a) *An unencumbered value of MLN1 – in particular, unencumbered by the Renewal Decision and Traditional Owner consent, and thus prior to the change to no longer recognise a Mineral Resource for MLN1*
- b) *An “as is” opinion on the value of MLN1, reflecting encumbrances arising from the Renewal Decision and position of the Traditional Owners and, if considered appropriate, the circumstance that ERA no longer recognises a Mineral Resource for MLN1.*

Adopted valuation approaches and methods

In assigning its overall valuation range and preferred value to Jabiluka, SRK is cognisant that ERA no longer reports Mineral Resources for the project, which has significantly eroded the associated value attributable to the project. SRK understands the decision to write-off the Jabiluka Mineral Resource was taken as a viable development pathway is no longer apparent within the foreseeable future. However, SRK considers that despite ERA writing down the carrying value of Jabiluka in its financial accounts to nil, there would be participants within the market who regard Jabiluka as holding residual value, if only in the potential associated with defining a pathway to production at some future point.

Given the development status of ERA’s mineral assets, SRK has used a combination of market and cost approaches to assist LEA in the valuation of ERA’s mineral assets. In forming its overall opinion regarding the Market Value for each of ERA’s mineral assets, SRK has adopted the market valuation approach using the precedent transactions method (for both mineral assets and commercial entities supported by peer trading methods).

In valuing the exploration potential of the Cooper Creek application areas, SRK has relied upon precedent transactions method as the primary methodology to derive its selected value range for the exploration potential. SRK has crosschecked the derived values using the geoscientific rating method.

Outcomes

Table ES.1 summarises SRK's opinion regarding the current Market Value of ERA's mineral assets in the NT.

Table ES.1: Valuation summary of ERA's mineral assets

Project	Reference	Unencumbered (A\$ M)			Encumbered (A\$ M)		
		Low	High	Mid	Low	High	Mid
Ranger Project	Table 7.26	- ¹	- ¹	- ¹	- ¹	- ¹	- ¹
Jabiluka Project	Table 7.13/ Table 7.23	816.1	1,037.6	926.9	332.2	443.0	387.6
Cooper Creek JV	Table 7.26	0.4	2.0	1.2	0.4	2.0	1.2
Total		816.5	1,039.6	928.1	332.6	445.0	388.8
Selected		816.5	1,039.6	928.1	332.6	445.0	333.0

Source: SRK analysis

Note: Any discrepancy between table values is due to rounding.

¹ no material value.

Value Positioning

SRK's positioning of its preferred unencumbered value is based on the mid-point of the range, as it has no preference towards either end of the range.

For its preferred positioning with respect to the encumbered value, SRK has elected to assign a value towards the lower end of its valuation range given:

- the various uncertainties which remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal)
- the longstanding and intergenerational opposition to the development of Jabiluka by Traditional Owner groups
- ERA's recent decision to write down the value of the Jabiluka's project in its financial accounts to nil
- the downward trajectory implied by ERA's decision to no longer report Mineral Resources at Jabiluka.

1 Introduction

1.1 Background

Energy Resources of Australia Ltd (ERA) is an Australian-based company, which until 2021 was engaged in the processing and sale of uranium oxide (U_3O_8) from its Ranger uranium mine, Australia's longest continually operating uranium mine. The principal activities of the Company now consist of site rehabilitation and closure of the former mine assets.

At the time of writing, ERA's main assets comprise the Ranger Rehabilitation Project (RRP) within the Ranger Project Area (RPA) and the Jabiluka ML¹. In addition, ERA also holds interests in two exploration licence applications (ELA) to the north of the Jabiluka ML and outside of the Kakadu National Park (the Cooper Creek JV Project).

Based on ERA's most recent Mineral Resources and Ore Reserves statement as outlined in ERA's 2024 Annual Report (refer ERA's ASX announcement dated 26 March 2025), no Ore Reserves or Mineral Resources were reported at either Ranger or Jabiluka. Up until this announcement (effective date 31 December 2025), ERA had reported Mineral Resources (Measured, Indicated and Inferred) at Jabiluka of 137,100 t of uranium oxide at a 0.2% U_3O_8 cut-off grade (as discussed further elsewhere within this report).

The RPA and the Jabiluka ML are located on Aboriginal freehold land and are surrounded by, but separate from, the World Heritage-listed Kakadu National Park, which extends over an area of approximately 19,800 km².

ERA is party to a suite of agreements which govern its activities on the RPA with the Gundjeihmi Aboriginal Corporation (GAC), on behalf of the Mirarr Traditional Owners, the Northern Land Council (NLC) and the Commonwealth Government.

While Jabiluka remains among the largest, high-grade undeveloped uranium deposits in the world, it will not be developed by either Rio Tinto or ERA without approval of the Mirarr Traditional Owners in accordance with the *Jabiluka Long Term Care and Maintenance Agreement* (2005).

ERA is headquartered in Darwin, Australia, and remains a significant employer in the NT and particularly in the Alligator Rivers Region. ERA's shares are publicly held and traded on the ASX under the code: ERA.

ERA's majority parent is Rio Tinto Limited (Rio Tinto or the Company). This interest is held through North Limited (North) (incorporated in Victoria, Australia) and its subsidiary, Peko-Wallsend Pty Ltd.

As announced to the ASX on 3 April 2024, ERA has appointed Rio Tinto to manage the RRP under a new Management Services Agreement (MSA). The MSA implements a Rio Tinto-led execution model, although ERA retains the right to approve the plans and budgets within which Rio Tinto will be required to operate. ERA also remains responsible for statutory obligations arising under environmental and other approvals: these cannot be delegated. Rio Tinto assumed management of the Ranger site on ERA's behalf from 3 June 2024.

¹ Note: On 26 July 2024, the NT Minister advised ERA that the Jabiluka Mineral Lease (MLN1) would not be renewed. As at the time of writing, ERA had obtained an order from the Court to stay the decision to refuse to renew MLN1. Accordingly, MLN1 remains on foot pending further orders of the Court.

On 19 November 2024², Rio Tinto announced that it held over 98% of the issued shares in ERA, as a result of the Company taking up its pro rata entitlement in the ERA's entitlement offer. Furthermore, in accordance with Rio Tinto's previously stated intentions, the Company intended to proceed with the compulsory acquisition of all remaining ERA shares that it did not already own. It proposed to do so at A\$0.002 per ERA share, being the same price as the entitlement offer.

SRK Consulting (Australasia) Pty Ltd (SRK) understands that Lonergan Edwards & Associates (LEA) has been engaged by North Limited, a wholly owned subsidiary of Rio Tinto, to prepare an independent experts report (IER) that, pursuant to Part 6A.2 of the *Corporations Act 2001* (Cth) (Corporations Act), is required to accompany the Compulsory Acquisition Notice to be issued by Rio Tinto under s667A of the Corporations Act. LEA's IER will be prepared in accordance with Australian Securities and Investments Commission (ASIC) guidance (including Regulatory Guide 111 Contents of expert reports (RG111)).

LEA subsequently engaged SRK to provide an ISR incorporating a technical assessment and valuation of ERA's mineral assets to accompany its IER. SRK understands that the IER and the ISR may be referred to, or extracted in whole or in part (with the consent of the relevant author), in materials to be released to the Australian Securities Exchange (ASX) and/or distributed to ERA shareholders in connection with the compulsory acquisition.

SRK was required to complete a technical assessment of the Ranger and Jabiluka projects under the current scope of work.

For the avoidance of doubt, SRK notes that it previously completed an ISR relating to these same mineral assets and dated September 2022 on behalf of Grant Thornton Corporate Finance Pty Ltd (Grant Thornton) (the 2022 SRK Report). This Report updates and amends, where necessary, the 2022 SRK Report. To the extent possible given the passage of time, SRK has attempted to use the same consulting team for this report, as prepared the 2022 SRK Report.

1.2 Scope

Under its mandate as determined in consultation with LEA, SRK has:

1. Completed a site visit to the Ranger Mine and met with relevant stakeholders and Rio Tinto/ERA management and advisors in Jabiru, Darwin and Brisbane to understand the respective points of view regarding options and constraints associated with ERA's mineral assets.
2. Considered the reasonableness of ERA's stated Mineral Resources estimates in light of potential project opportunities and constraints.
3. Considered the reasonableness of the cost estimates associated with the proposed rehabilitation and mine closure plans (MCP).

² Refer Rio Tinto's ASX announcement "Rio Tinto takes up full entitlements in ERA rights issue, moving to over 98% ownership", dated 19 November 2024, source: <<https://announcements.asx.com.au/asxpdf/20241119/pdf/06bl3qt9sdthph.pdf>>.

4. Prepared a report which includes:
 - a. a detailed description of ERA's mineral assets including associated tenure, the status of exploration/development/rehabilitation and progress relative to the MCP, defined Mineral Resources, and exploration opportunities (if warranted)
 - b. valuation methodologies and principal assumptions adopted by SRK in determining the value of ERA's mineral assets
 - c. assistance in regard to the valuation of the Jabiluka Mineral Resource
 - d. valuation of the exploration potential associated with the broader tenure
 - e. details of any factors that would result in the Market Value of these assets differing from the Technical Value, including the quantum of adjustment required, if any
 - f. valuation results crosschecked against other relevant benchmarks, where possible.

1.3 Reporting standard

This ISR has been prepared to the standard of, and is considered by SRK to be, a Technical Assessment and Valuation Report under the guidelines of the VALMIN Code (2015). The authors of this Report are Members of either the Australasian Institute of Mining and Metallurgy (AusIMM) or the Australian Institute of Geoscientists (AIG) and, as such, are bound by both the VALMIN and JORC codes. For the avoidance of doubt, this Report has been prepared according to:

- the 2015 edition of the *Australasian Code for Public Reporting of Technical Assessments and Valuations of Mineral Assets* (VALMIN Code)
- the 2012 edition of the *Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves* (JORC Code).

For the purpose of the Report, value is defined as Market Value, being *'the amount of money (or the cash equivalent or some other consideration) for which a mineral asset should change hands on the date of valuation between a willing buyer and a willing seller in an arm's length transaction after appropriate marketing, wherein the parties each acted knowledgeably, prudently and without compulsion'*.

As defined in the VALMIN Code (2015), Mineral Assets comprise all property including (but not limited to) tangible property, intellectual property, mining and exploration tenure and other rights held or acquired in connection with the exploration, development of and production from those tenures. This may include the plant, equipment and infrastructure owned or acquired for the development, extraction and processing of minerals in connection with that tenure.

A first draft of the report was supplied to Rio Tinto and ERA to check for material errors, factual accuracy and omissions before the final report was issued. SRK's Report does not comment on the 'fairness and reasonableness' of any transaction between ERA and any other parties.

1.4 Work program

This assignment commenced on 16 January 2025, with an initial scoping meeting with key Company representatives and their advisors followed by a review of ERA's supplied data (in a

virtual data room), publicly available data and other information sourced by SRK from literature, as well as subscription databases such as S&P Capital IQ Pro database services.

In accordance with Section 11.1 of the VALMIN Code (2015), a site visit may be required if it is likely to provide information material to the preparation of the Report. Accordingly, a site inspection was completed by SRK's representatives, Mr Ray Mayne and Ms Lisa Chandler on 3 February 2025, with subsequent meetings with key project leads in Darwin and Brisbane. The focus of SRK's site inspection was to observe the progress of site rehabilitation and closure activities, to meet with local stakeholders and discuss ongoing permitting and approvals aspects relating to the project. SRK representatives have also met with project team members and their advisors in Darwin and Brisbane to gain a greater understanding of the status of future works and associated costings, as well as project constraints and opportunities. In addition, several of the SRK consultants involved in the preparation of this ISR have previously worked at Ranger or been involved in exploration, technical reviews and valuations of assets in the near environs to ERA's mineral assets in the period prior to 2010.

SRK's work program included:

- review of the Company's mineral assets and associated Exploration Results/Mineral Resources for compliance with JORC Code (2012)
- review of the proposed MCPs and associated cost estimates
- review of recent rehabilitation and closure activities
- compilation of implied value multiples based on transaction and peer company analysis
- provision of the draft report (including SRK's internal and external peer reviews)
- finalisation of the report (inclusive of values) after receiving feedback from Rio Tinto/ERA/LEA regarding factual accuracy, errors or omissions.

1.5 Legal matters

SRK has not been engaged to comment on any legal matters. SRK notes that it is not qualified to make legal representations as to the ownership and legal standing of the mineral tenements that are the subject of this Report. SRK has not attempted to confirm the legal status of the tenements with respect to joint venture (JV) agreements, local heritage or potential environmental or land access restrictions.

SRK notes that the non-renewal of the Jabiluka Mineral Lease (MLN1) was announced to the ASX on 26 July 2024. On 6 August 2024, ERA commenced proceedings in the Federal Court of Australia (Court) seeking judicial review of the refusal by the Northern Territory Government to renew MLN1. On 8 August 2024, the Court granted an interim stay of the decision to refuse to renew MLN1, which means that MLN1 remains on foot pending further orders from the Court.

To the extent possible, given certain matters remain before the Court, SRK has completed a review of the subject tenure to this report to ensure ERA holds title and the subject tenements are in good standing. SRK has confirmed this to be the case.

1.6 Valuation Date and Effective Date

The Valuation Date and the Effective Date of this Report is 28 February 2025.

All monetary amounts are expressed in Australian dollars (A\$), unless otherwise stated. The final valuation is expressed in A\$ terms. The Valuation is only appropriate for this date and may change in time in response to variations in economic, market, legal or political factors, in addition to ongoing exploration results.

1.7 Project team

This Report has been prepared by a team of consultants from SRK's offices in Australia. Details of the qualifications and experience of the consultants who have carried out the work in this Report, who have extensive experience in the mining industry and are members in good standing of appropriate professional institutions, are set out in Table 1.1.

Table 1.1: Details of the qualifications and experience of the consultants

Specialist	Position/ Company	Responsibility	Length and type of experience	Site inspection	Professional designation
Jeames McKibben	Principal Consultant/ SRK	Project Manager, Lead Author and Valuation	+30 years; +20 years in valuation and corporate advisory, 2 years as an analyst and 8 years in exploration and project management roles	None	BSc (Hons), MBA, FAusIMM (CP), MAIG, MRICS, MSME
Mathew Davies	Senior Consultant, SRK	Transaction analysis	12 years: 9 years in consulting specialising in valuation and corporate advisory and 3 years as an exploration geologist.	None	BSc (Hons), MAusIMM
James Carpenter	Senior Consultant/ SRK	Mineral Resources and Geology	+20 years' experience in Mineral Resource estimation, open pit and underground production, and reconciliation and project evaluation	None	BAppSc (Hons), MGeostats, MAusIMM (CP)
Robert Urie	Principal Consultant/ SRK	Mine Engineering	+25 years – open pit and underground engineering, specialising in complex underground mining projects	None	BEng (Hons), FAusIMM
Mike Pietrobon	Associate Principal Consultant	Metallurgical testwork and processing	+35 years in consulting specialising in engineering design, metallurgical laboratory management and independent technical reviews	None	BSc (Hons), MSc, MAusIMM
Lisa Chandler	Principal Consultant/ SRK	Stakeholder relations, permitting and approvals	30 years – 23 years as environmental consultant to the resources sector; 5 years as government regulator; 3 years in operations	03/02/2025	MEng, BSc, MNELA, MAusIMM, AMANCOLD, MSER

Specialist	Position/ Company	Responsibility	Length and type of experience	Site inspection	Professional designation
Kate Vershinina	Principal Consultant/ SRK	Environment, Social and Governance	+20 years – in both operational and consultancy ESG roles throughout Europe, Australia and New Zealand.	None	Meng, BEM, EIANZ/CEvP, MAusIMM
Ray Mayne	Principal Consultant/ SRK	Mine closure and rehabilitation	17 years – 11 years closure planning and closure liability assessments	03/02/2025	BSc, Pr.Sci.Nat, PMP
Danielle Kyan	Principal Consultant/ SRK	Closure cost estimation	17 years specialising in closure cost estimation	None	BAppSc (Hons), MAusIMM
Jeff Parshley	Corporate Consultant/ SRK USA	Peer review	+35 years in environmental and mine closure planning and cost estimation.	None	BA, PG
Philip Ashley	Principal Consultant/ SRK	Peer review	+40 years – mine engineering and management, technical and corporate support	None	BE (Hons) Mining, SME, MAusIMM

1.8 Limitations, reliance on information, declaration and consent

1.8.1 Limitations

SRK's opinion contained herein is based on information provided to SRK by ERA throughout the course of SRK's investigations as described in this Report, which in turn reflect various technical and economic conditions at the time of writing. Such technical information as provided by ERA was taken in good faith by SRK.

SRK has also considered publicly available information relevant to the Ranger and Jabiluka projects. This includes, most notably, publications issued by the Commonwealth Office of the Supervising Scientist.

SRK has not recalculated the Mineral Resources estimates but has independently assessed the reasonableness of the estimates.

This Report includes technical information, which requires subsequent calculations to derive subtotals, totals, averages, and weighted averages. Such calculations may involve a degree of rounding and consequently introduce an error. Where such errors occur, SRK does not consider them to be material.

As far as SRK has been able to ascertain, the information provided by ERA was complete and not incorrect, misleading, or irrelevant in any material aspect.

ERA has confirmed in writing to SRK that full disclosure has been made of all material information and that to the best of its knowledge and understanding, the information provided by ERA was complete, accurate and true and not incorrect, misleading or irrelevant in any material aspect. SRK has no reason to believe that any material facts have been withheld.

1.8.2 Statement of SRK independence

Neither SRK nor any of the authors of this Report have any material present or contingent interest in the outcome of this Report, nor do they have any pecuniary or other interest that could be reasonably regarded as being capable of affecting their independence or that of SRK. SRK has previously undertaken work for the Rio Tinto Group in relation to other projects in Australia and around the world. Before taking this assignment, SRK has reviewed these other engagements and satisfied itself that these were completed on an independent and arm's length basis and that no further disclosures are deemed to be required.

A number of the authors of this Report previously worked at Ranger and hence have a good understanding of site conditions. As noted in Section 1.1, SRK has previously authored the 2022 SRK Report (an ISR document on these same assets) dated September 2022. In addition, SRK has also completed geotechnical and ventilation shaft rehabilitation reviews on behalf of ERA in the period 2014 to 2016, but has no recent technical association with the Company in regard to the mineral assets that are the subject of this Report. SRK has no beneficial interest in the outcome of the technical assessment being capable of affecting its independence.

SRK's fee for completing this Report is based on its normal professional daily rates plus reimbursement of travel and other incidental expenses. The payment of that professional fee is not contingent on the outcome of this Report.

1.8.3 Indemnities

As recommended by the VALMIN Code (2015), Rio Tinto has provided SRK with an indemnity under which SRK is to be compensated for any liability and/or any additional work or expenditure resulting from any additional work required:

- which results from SRK's reliance on information provided by either Rio Tinto and ERA or by Rio Tinto and ERA not providing material information
- which relates to any consequential extension workload through queries, questions or public hearings arising from this Report.

1.8.4 Consent

SRK consents to this Report being included in LEA's IER provided it is included in its entirety and considered within the context in which the ISR is provided. SRK provides this consent on the basis that the ISR expressed in the Executive Summary and in the individual sections of this Report are considered with, and not independently of, the information set out in the complete report.

1.8.5 Consulting fees

SRK's estimated fee for completing this Report is based on its normal professional daily rates plus reimbursement of incidental expenses. The fees are agreed based on the complexity of the assignment, SRK's knowledge of the assets, and availability of data. The fee payable to SRK for this engagement is estimated at approximately A\$115,000. The payment of this professional fee is not contingent upon the outcome of the Report.

1.9 Units of measure and currency

Quantities are generally stated in *Système international d'unités* (SI) metric units, the standard Australian and international practices, including metric tonne (tonne, t) for weight, and kilometre (km) or metre (m) for distances.

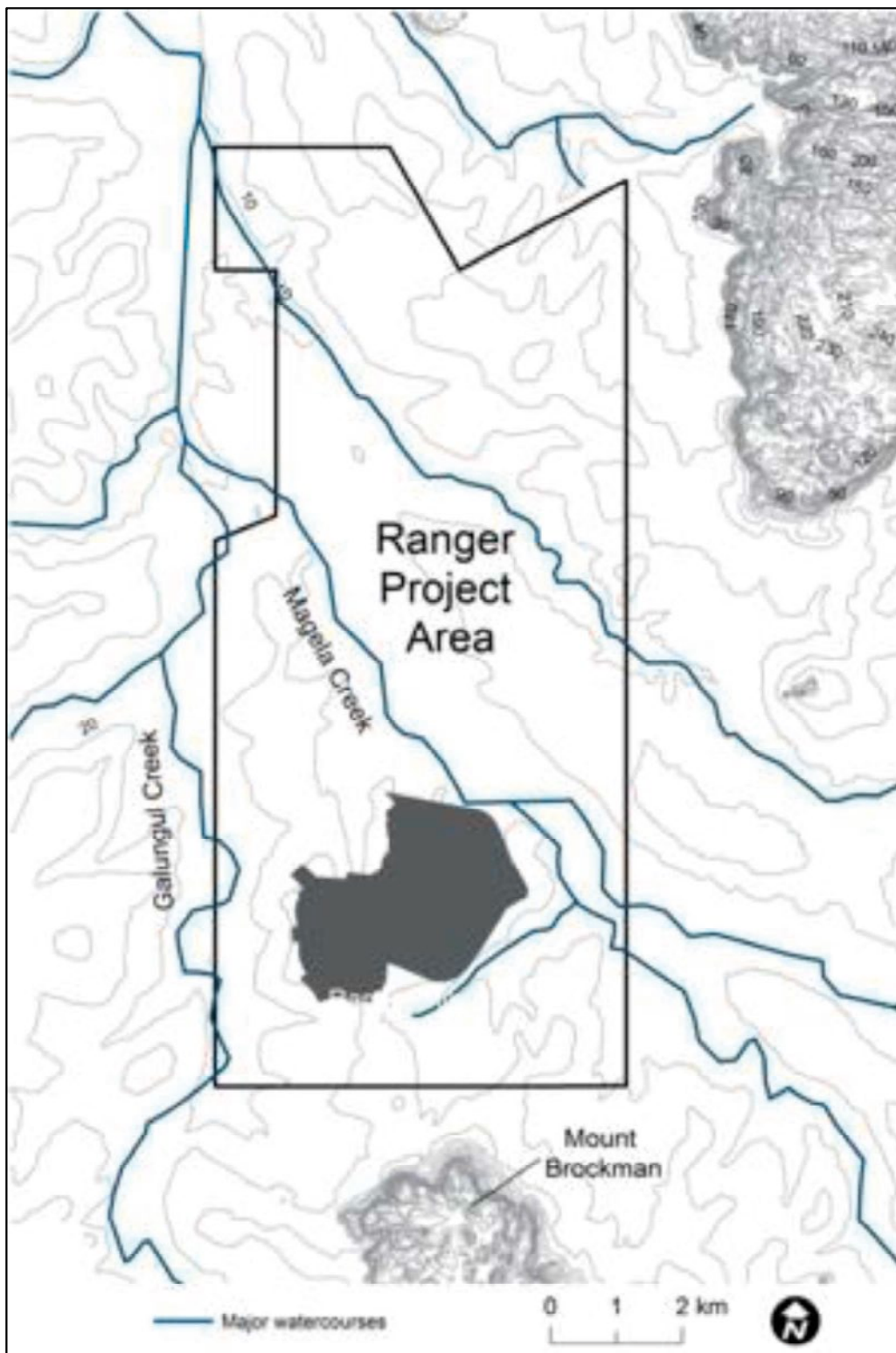
Throughout this report, measurements are in metric units and currency is shown in United States dollars (US\$) or Australian dollars (A\$) unless otherwise stated.

1.10 Nomenclature

Throughout this Report, the following terms are used as defined, unless otherwise stated:

- **Cooper Creek Joint Venture** – an early-stage exploration project registered to ERA (but upon award to be distributed to other third parties) comprising two exploration licence applications located to the north of the RPA and outside of the Kakadu National Park. Further details are outlined in sections 2.3.3, 2.3.4 and 5 of this Report.
- **Jabiluka Project** – land which is subject to Jabiluka Mineral Lease North 1 (MLN1), on which is located a uranium-bearing mineral deposit known as the Jabiluka II deposit. Further details are outlined in sections 2.3.2, 2.3.4 and 4 of this Report.
- **Mineral Assets** – a collective term encompassing the entirety of ERA's projects and mineral interests, including but not limited to tangible property, intellectual property, mining and exploration tenures and other rights held or acquired in connection with the exploration, development of and production from those tenures. It may include plant, equipment and infrastructure as contained in those tenures.
- **RPA – Ranger Project Area:** land which is subject to Authorisation 0108 and covering approximately 79 km², with the previous mining area as shown below in dark grey. Further details are outlined in sections 2.3.1, 2.3.4 and 3 of this Report.
- **RRP – Ranger Rehabilitation Project:** the rehabilitation project as required by ERA to meet statutory requirements and its obligations for rehabilitation and closure of the disturbed areas. The key closure domains corresponding to former mining area (as shown in the dark grey area above) however ERA is responsible for rehabilitation works covering the entire RPA, with domain 11 comprising mostly undisturbed areas outside of the former mining area and some exploration, water bores and monitoring locations.
- **2022 Grant Thornton Valuation:** The Independent Expert Report prepared by Grant Thornton Corporate Finance Pty Ltd (Grant Thornton) dated 26 September 2022 commenting on the fair value of ERA shares. For further details refer to Section 6.2
- **2022 SRK Report:** The Independent Specialist Report prepared by SRK in September 2022 on behalf of Grant Thornton and which is included as an appendix to the 2022 Grant Thornton Valuation. In preparing this Report, SRK has drawn heavily on the 2022 SRK Report, particularly with respect to the technical aspects relating to the former mining operations at RPA (which are completed), previous technical studies at Jabiluka (the status of which remains unchanged) and the Cooper Creek Joint Venture (the status of which also remains unchanged).

Figure 1.1: Location of the Ranger Project Area and the Ranger Rehabilitation Project



Source: ERA, Ranger Mining Management Plan PLN005, 2019

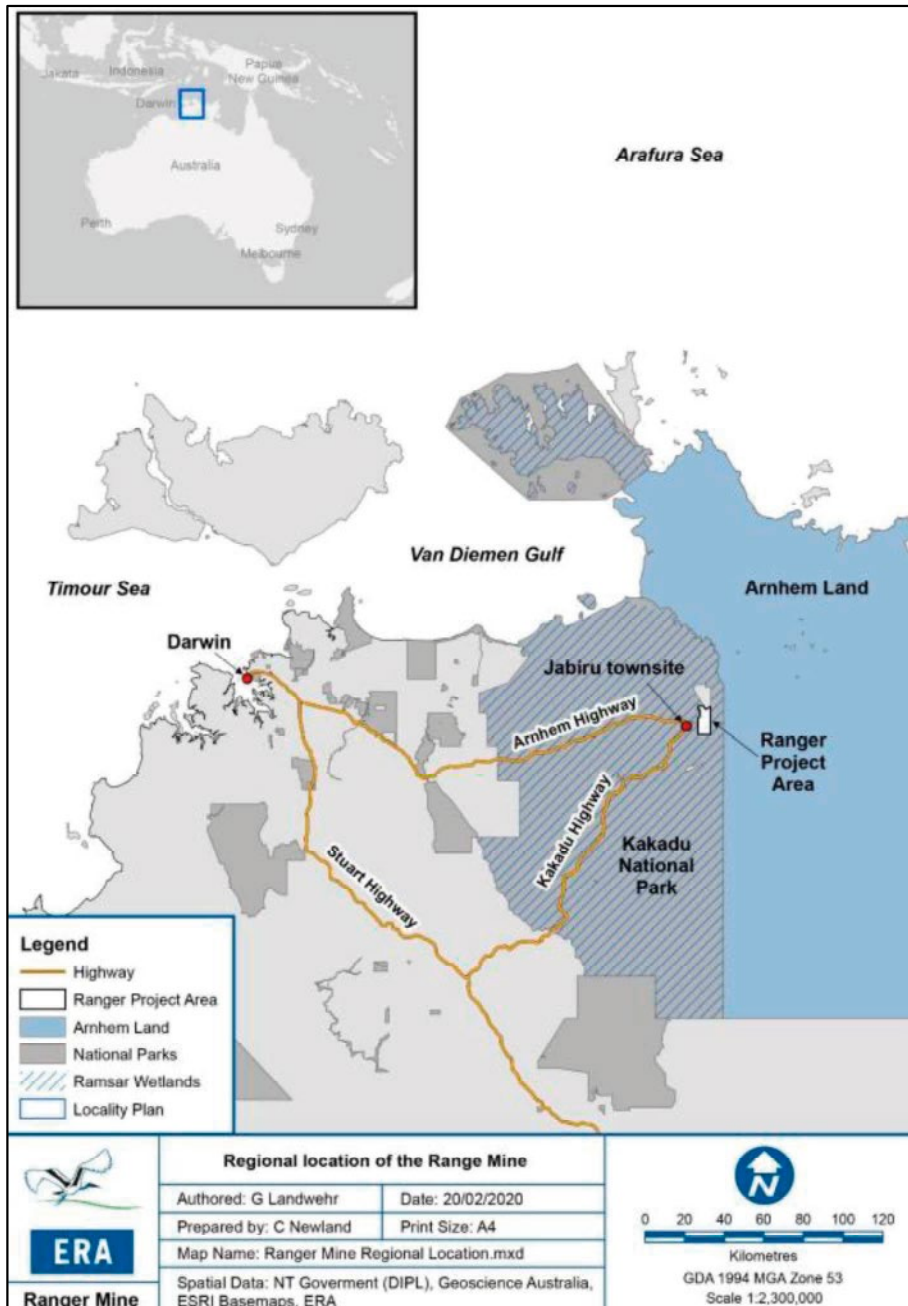
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2 Project Setting

2.1 Location and access

As shown in Figure 2.1, the RPA is located approximately 8 km east of Jabiru and approximately 260 km east of Darwin, in Australia's Northern Territory at latitude 12° 41' S, longitude 132° 55' E. The Project is covered by the Alligator River (SD 53-1) 1:250 000 scale map sheet (Needham, 1984).

Figure 2.1: Location of the Ranger project area



Source: ERA (2024) – 2024 Mine Closure Plan

The RPA is located in the Alligator Rivers region. The site lies approximately 70 km southeast of Van Diemen Gulf between the South Alligator and East Alligator rivers on the extensive northern coastal plains. To the east lies the Arnhem Land Plateau.

The RPA has been excised from the Kakadu National Park and lies close to the northeastern boundary of Kakadu National Park within the Arnhem Land Aboriginal Reserve. The Jabiluka deposits are 15 km to the north, while the Koongarra deposit (which was incorporated into Kakadu National Park by proclamation in 2013) lies 20 km to the south-southwest, and the third party held Nabarlek deposit is 77 km to the northeast. The town of Jabiru is located to the west of the RPA and is included in the Kakadu National Park.

The Jabiluka mineral licence (MLN1) lies directly north of the RPA and has also been excised from the Kakadu National Park. On 24 May 2024, the Senior Executive Director Mines, Department of Industry, Tourism and Trade (acting as delegate for the NT Minister for Mining) declared the establishment of a new reserve (RL 33778) over land corresponding to the land occupied by Jabiluka tenement, MLN1. The reserve is designated as a 'general reservation' (that is, no specific purpose such as conservation has been specified for the reserve). The conditions on the reserve include a prohibition on the land being used for the following activities (by ERA or any other entity):

- exploration for minerals generally
- extraction of minerals generally
- exploration for extractive minerals
- extraction of extractive minerals.

Under the terms of the reservation, no person is entitled to apply for the grant of any Mineral Title in relation to the reserved land once the reservation comes into effect. The reservation will take effect on the day that MLN1 ceases to be in force.

The town of Jabiru was originally established in 1982 to service the Ranger mine. Jabiru is the main service town for the Kakadu National Park, providing a range of small regional town facilities for national and international visitors and the town's residents.

In June 2021, Jabiru was formally granted to the Kakadu Aboriginal Land Trust and the town has been largely transitioned from a mining support town to a government services centre and tourism hub. Through the Gundjehmi Aboriginal Corporation Jabiru Town and a related entity known as Jabiru Property Services Ltd (a registered charity – ABN 14 633 120 000), the Mirarr People now formally own and manage the town. The Northern Territory government, the Commonwealth of Australia and ERA entered into a Memorandum of Understanding (MOU) with the Gundjehmi Aboriginal Corporation (GAC) on the future of the Jabiru township in August 2019. The MOU set out shared intentions for supporting the transition of Jabiru township to a post-mining environment but was not legally binding. In the MOU, the NT government commits to maintaining service levels for health, education, police, fire and emergency services until at least 2023.

SRK has not discovered any formal extension to the MOU, however it notes that representatives from the several organisations participating in the MOU continue to meet at an 'MOU Parties Forum', the most recent meeting of the Forum took place on 7 November 2024. Arrangements for ongoing funding of the Jabiru township are not entirely clear, however SRK notes that the 2024–2025 budget issued by the NT Government in May 2024 included, for example, A\$50.4 M (of which A\$19.2 M in new works was proposed in 2024–2025) for "infrastructure to reposition Jabiru as a

tourism and regional Services hub”. The Federal budget for 2024–2025 also makes an allocation of A\$11.4 M for a 4-year period starting in 2024–2025 for ‘priority remediation projects in the Jabiru township’, including (but not limited to) remediation of houses and road upgrades.

A Communities and Social Performance Plan (CSPP) prepared for the Ranger Rehabilitation Project (November 2024) states that in 2023 the NT Government committed A\$135.5 M to physical infrastructure investment in Jabiru and that a further commitment of A\$216 M was made by the Federal government. Table 3.1 of the CSPP lists ten action items to be delivered as part the Ranger Rehabilitation Project with the objective of supporting the social transition of Jabiru “in line with the Mirarr People’s Vision Action Plan”. Actions include rectification and transfer of properties, as well as less tangible actions involving planning, communications and capacity building.

ERA manages the Jabiru airport, but is required to remove this infrastructure as part of the current rehabilitation requirements, unless otherwise agreed with relevant stakeholders. As at the date of this report, no alternative manager for the airport had been identified.

The West Arnhem Shire Council is responsible for the production, treatment and mains reticulation of water for Jabiru from three bores situated near Nanambu Creek on the Arnhem Highway. The Jabiru community is also served by the West Arnhem College and a Regional Training Centre operated by the NT Department of Education and Training and Charles Darwin University. Jabiru is the health service hub for the Kakadu region and plays a vital role in the provision of health services to the outstations and town camps surrounding Jabiru. A new purpose-built health centre – largely funded by the NT Government – opened in September 2024. The town is powered by a new hybrid power station installed by the Northern Territory government on the outskirts of the town to replace the town’s previous diesel fuel supplied station from the Ranger mine.

The RPA and Jabiru are accessible from Darwin via the sealed Stuart and Arnhem highways via Pine Creek, as well as by air charter.

The Jabiluka area is accessible from the township of Jabiru along an all-weather bitumen road and a secondary gravel road, which connects to Gunbalanya (historically referred to as Oenpelli) and the Nabarlek uranium deposit.

2.2 Climate and physiography

The RPA area is bounded on the east and north by Magela Creek and its tributaries and on the west by Gulungul Creek and its tributaries. To the east lies the Arnhem Land Plateau, composed of the Kombolgie Subgroup sandstones and conglomerates. Most surface cover within the RPA is outwash from the Kombolgie sandstones, under which lies a lateritic profile. The surrounding region is known for its high conservation and cultural values.

The Jabiluka area is situated along the eastern edge of a large, low-lying flood plain which is extensively flooded during the wet season from December to April. During the remainder of the year the area becomes a flat mud plain containing numerous billabongs and dissected by meandering intermittent streams. The Arnhem Land Plateau rises abruptly from the plains and continues to the east. This area is characterised by a deeply incised, flat lying sandstone sequence with steep cliffs and narrow gorges.

The area’s climate is dictated by the annual migration of the monsoon trough that brings intensive rain from November to March (wet season) and dry conditions from May to September (dry

season) with October and April as transitional months. Mean temperatures vary from 19°C to 32°C in the dry season and 24°C to 38°C in the wet season. The annual average rainfall is 1,550 mm, although rainfall ranges between 1,000 mm and 2,600 mm per annum. Annual evaporation is approximately 2,594 mm and relative humidity varies from 85% in February to 55% in August. During the wet season, the RPA can experience high winds and rainfall and as a result flooding is common with the creeks surrounding the RPA forming sheets of water extending beyond their banks.

2.3 Ownership, land access and tenure

The Commonwealth and NT governments share regulatory responsibility for uranium mining, rehabilitation and closure in the Northern Territory. As such, various pieces of legislation are pertinent to ERA's mineral assets including:

- *Atomic Energy Act 1953* (Cth) (Atomic Energy Act)
- *Atomic Energy Amendment (Mine Rehabilitation and Closure) Act 2022* (Cth) (Atomic Energy Amendment)
- *Environmental Protection (Alligator Rivers Region) Act 1978* (Cth)
- *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth) (Aboriginal Land Rights Act)
- *Nuclear Non-Proliferation (Safeguards) Act 1987* (Cth)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth)
- *Mining Act 1980* (NT)
- *Mineral Titles Act 2010* (NT)
- *Mining Management Act 2001* (NT) (Mining Management Act)
- *Environment Protection Act 2019* (NT)
- *Northern Territory Aboriginal Sacred Sites Act 1989* (NT).

ERA mineral assets lie in three areas (Figure 2.2) and span four tenements (Table 2.1):

- Within the RPA, and the underlying ELA9644, within which the historical R3D Mineral Resource was located. No further work is being conducted on further development options for the R3D deposit, as ERA no longer possesses the authorisation to mine at the Ranger site.
- Within mineral lease MLN1, within which the Jabiluka II Mineral Resource is located.
- Within ELA23311 and ELA23312, collectively known as the Cooper Creek JV Project.

2.3.1 Ranger Project Area

Aboriginal freehold title exists across the RPA. The northern part of the RPA is located on aboriginal freehold land held by the Jabiluka Aboriginal Land Trust (predominantly NT portion 2376), while the southern part of the RPA falls within land held by the Kakadu Aboriginal Land Trust (predominantly NT portion 2376).

Title to the RPA was originally granted to the Kakadu Aboriginal Land Trust, under the Aboriginal Land Rights Act. The boundaries of the RPA are defined in Schedule 2 of the Aboriginal Land

Rights Act. In 1978, the Australian Government entered into an agreement with the NLC to permit mining to proceed. The Ranger site is the land described in Schedule 2 to the Aboriginal Land Rights Act.

Tenure at the Ranger site is subject to 'environmental requirements' set out in Appendix A of a Section 41 Authority issued under the *Atomic Energy Act* (Section 41 Authority) and is also regulated under the Ranger Authorisation 0108-18 (now Deemed Mining Licence DML0108-18) as varied on 22 June 2018) issued under the *Mining Management Act 2001*. Clause 5.1(a) of the Section 41 Authority only permitted ERA to explore, mine and process uranium ore at Ranger uranium mine until 8 January 2021. Accordingly, processing operations at Ranger ceased on 8 January 2021.

Exploration, development and mining of the Ranger 3 Deeps deposit (R3D) within the RPA are no longer authorised activities under the Section 41 Authority.

On 24 November 2022, the *Atomic Energy Amendment (Mine Rehabilitation and Closure) Bill 2022*, was passed, allowing ERA to apply to extend its Section 41 Authority to enable the access to and rehabilitation of the Ranger site to continue beyond the 8 January 2026 deadline.

On 27 May 2024, ERA applied for a new Rehabilitation Authority under Section 41CA of the amended *Atomic Energy Act 1953*. Work continues with the Commonwealth Government, the NLC, GAC (on behalf of the Mirarr Traditional Owners) to negotiate the revised Section 41 Authority for the RPA, which is required to allow additional time for ERA to complete the rehabilitation, including long-term monitoring and maintenance.

The entire area of the RPA is underlain by an exploration licence application (ELA) – EL9644 (32 graticular sub-blocks) originally granted under the NT *Mining Act 1980* but subsequently transitioned to an EL application under the *Mineral Titles Act 2010* – which is registered (100%) to ERA. The effective date of the application is stated on the NT Government Strike online portal as 1 August 1996, with a stated consent date of 15 August 1996.

2.3.2 Jabiluka Mineral Lease

The Jabiluka Mineral Lease, MLN1, which is not part of the RPA, is an ML initially granted under the NT *Mining Act 1980* but subsequently transitioned under the *Mineral Titles Act 2010*. The following matters are of relevance to the status of MLN1 as at the time of writing:

- Section 2 (Page 7) of the original Mineral Lease documentation under the NT *Mining Act 1980*, notes that “*provided the lessees have complied with the Mining Act and the conditions to which this lease is subject, the Minister at the expiration of this lease and in accordance with that Act will renew this lease for a further term not exceeding ten (10) years*”.
- Subsections 187(1) and (3) of the *Mineral Titles Act 2010 (NT)*, oblige the NT Minister to act in accordance with the advice of the Commonwealth Minister (i.e. the Minister administering the Atomic Energy Act) in respect of “prescribed substances” (which include uranium). This obligation does not extend to the NT Minister’s decisions relation to granting (or renewal) of mineral titles for minerals exploration under Part 3 Division 1 of the Mineral Titles Act.
- On 20 March 2024, ERA lodged a renewal application for MLN1.

- On 5 June 2024, a reserve land area under the *Mineral Titles Act 2010 (NT)* over MLN1 was gazetted as general reserved land and is designated as RL33778³. RL33778 will only take effect when MLN1 has ceased to be in force. The land is reserved from the following activities; a) exploration for minerals generally, b) extraction of minerals generally, c) exploration for extractive minerals, d) extraction of extractive minerals and a person is not entitled to apply for the grant of any mineral title in relation to the land.
- On 26 July 2024, ERA announced to the ASX that the NT Minister had advised ERA that MLN1 would not be renewed based on advice from the Commonwealth Minister.
- On 27 July 2024, the Prime Minister announced that the Commonwealth will work with traditional owners to make Jabiluka part of the Kakadu National Park⁴.
- Also on 27 July 2024⁵, Commonwealth Ministers Plibersek and King released a joint media release that “*the Albanese Labour Government has advised the Northern Territory Government that the Jabiluka Mineral Lease should not be renewed, allowing the site to be added to Kakadu National Park*”.
- On 6 August 2024, ERA commenced proceedings in the Federal Court of Australia (Court) against the Commonwealth Minister, the Commonwealth of Australia, the NT Minister, the Northern Territory and the Jabiluka Aboriginal Land Trust, seeking judicial review of the renewal decision, including the Commonwealth Government’s advice to the Northern Territory Government to refuse the renewal of MLN1. The Northern Land Council and Yvonne Margarula have subsequently been joined to these proceedings.
- On 8 August 2024, ERA obtained an order from the Court to stay the decision to refuse to renew MLN1, the effect of that decision and its enforcement or execution, pending further order of the Court. Accordingly, MLN1 remains on foot pending further orders of the Court.
- On 22 August 2024, ERA announced the matter was listed for a final Court hearing commencing on 28 October 2024.
- On 28 October 2024, ERA announced the Court had determined that the final hearing for proceedings would be rescheduled to a later date to give State and Territory Attorney-General the opportunity to be heard on potential constitutional law issues being raised in arguments before the Court. A new date was not set at that time.
- A Court hearing regarding the NT Minister’s decision to not renew MLN1 is currently scheduled for the second week of May 2025, with a decision to be published after this date following Court deliberations. As at the time of writing, the status of MLN1 remains unchanged.

³ https://nt.gov.au/__data/assets/pdf_file/0003/1390926/s47.pdf

⁴ Refer paragraph 12 of the Affidavit of Leon Chung, dated 30 September 2024 <https://www.federalcourt.gov.au/__data/assets/pdf_file/0020/121916/6.-Affidavit-of-Leon-Chung-affirmed-30-September-2024.pdf >.

⁵ Joint media release Hon Tanya Plibersek MP, Minister for the Environment and Water and Hon Madeleine King, MP, Minister for Resources, ” Work begins to add Jabiluka site to Kakadu National Park”, dated 27 July 2024, source <<https://minister.dcceew.gov.au/plibersek/media-releases/joint-media-release-work-begins-add-jabiluka-site-kakadu-national-park>.>

2.3.3 Cooper Creek JV Project

In addition to the RPA and Jabiluka Projects, ERA is the registered holder of a 100% interest in two EL applications, EL23311 (127 graticular sub-blocks) and EL23312 (135 graticular sub-blocks), known as the Cooper Creek JV Project and located to the north and outside of the Kakadu National Park. Applications for these tenures were first lodged in August 2001, with vetoes commencing on 15 November 2015 for a 5-year period which was completed on 15 November 2020. SRK understands that these tenures remain in moratorium pending negotiations with Traditional Owners.

2.3.4 Summary

Table 2.1 summarises the current authority and mineral tenures held by ERA in the East Alligator River mineral field.

Table 2.1: Authority and tenement schedule as at February 2025

Number	Status	Area (km ²)	Interest	Granted	Expiry	Originating Act
Authority 0108	Authorised	79.0	100%		08/01/2021*	Atomic Energy Act 1953
EL9644	Application	79.0	100%	-	-	NT Mining Act 1980/Mineral Titles Act 2010
MLN1	Renew Retain	72.75	100%	12/08/1982	11/08/2024 [^]	NT Mining Act 1980/Mineral Titles Act 2010
EL23311	Application	369.64	100%#	-	-	NT Mining Act 1980/Mineral Titles Act 2010
EL23312	Application	440.6	100%#	-	-	NT Mining Act 1980/Mineral Titles Act 2010

Source: ERA, NT Strike portal, accessed 24 February 2025

Notes: Areas as stated on NT Strike portal

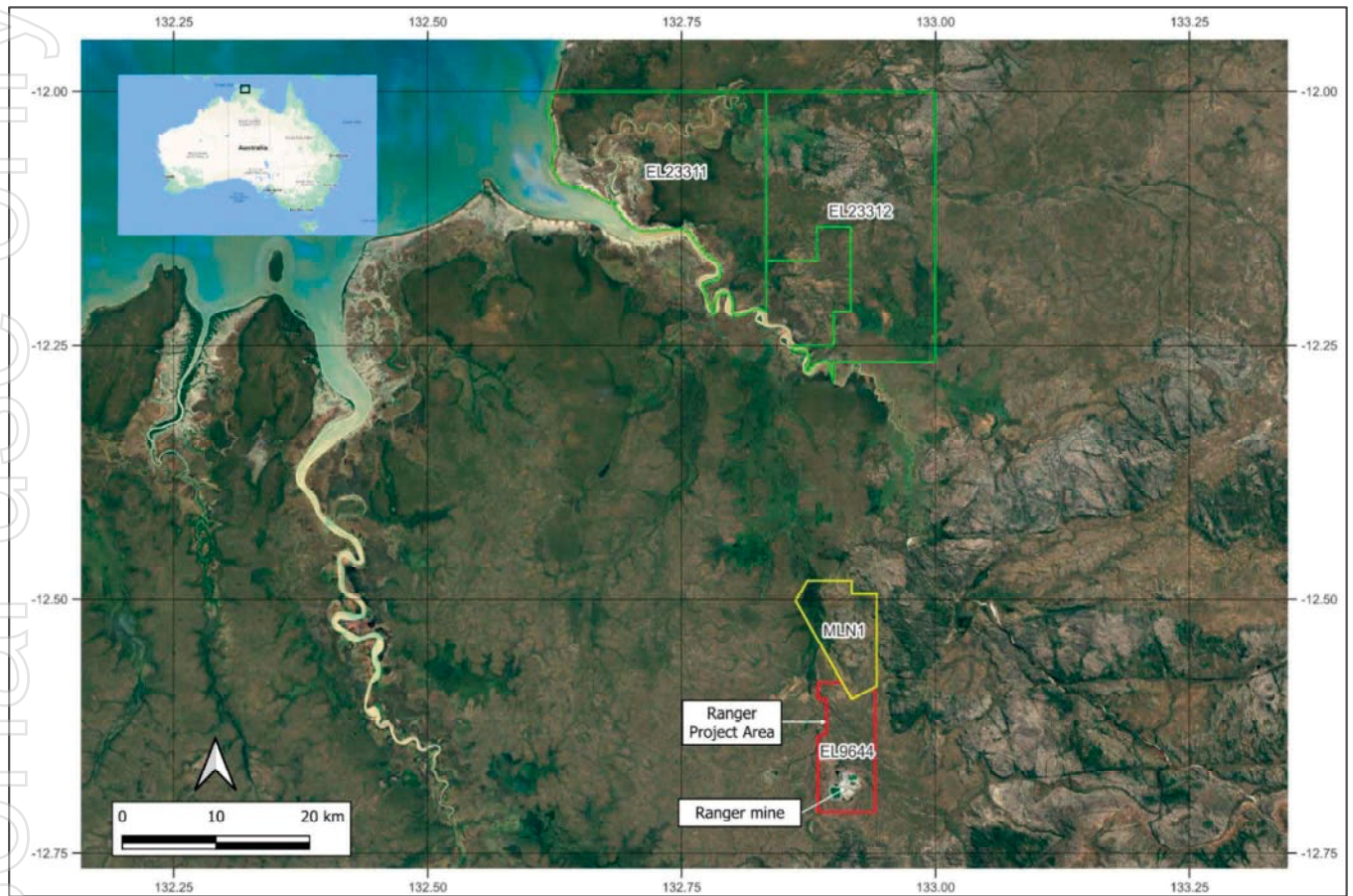
* As set out in Section 2.3.1 above, a new section 41 authority is required for access to the RPA site beyond 8 January 2026, and negotiations for a new Rehabilitation Authority are ongoing.

[^] As set out in Section 2.3.2 above, renewal is currently the subject of Court proceedings and the status of MLN1 remains unchanged pending further orders.

Tenement is wholly registered to ERA but held in JV with Cameco Australia Pty Ltd (Cameco) and Sutton Motors Pty Ltd (in moratorium). ERA's interest in the JV is 50%.

On page 99 of its 2023 Annual Report (issued in March 2024), ERA noted that in order to maintain its current right to its mineral tenures, the Company was required to outlay an amount of A\$1.322 M in the year ending 31 December 2024 for tenement lease rentals. This amount includes payments for the RPA and Jabiluka MLN1. For periods beyond 1 year, but not later than 5 years, ERA expected future payments of A\$1.378 M.

Figure 2.2: Location of ERA's tenements



Sources: SRK analysis, Northern Territory Geological Survey (STRIKE database)

2.3.5 Other land uses

The surrounding area to the RPA, Jabiluka MLN1 and Cooper Creek joint venture tenures includes several land use types including Kakadu and Garig Gunak Barlu National Parks, mining leases and native title lands.

Land tenure in the region is complex and is a combination of Aboriginal freehold land and Australian Government land (Crown Land), which is managed through a number of leasing, governance and service arrangements.

Aboriginal freehold title exists across most of the land of the RPA. Aboriginal freehold titles granted under the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth) are held by the Kakadu Aboriginal Land Trust. NT Portion 2376 is leased back to the Director of National Parks with the lease expiring on 31 December 2077. However, not all of NT Portion 2376 is included in the declaration of Kakadu National Park, as part of it is within the RPA. NT Portion 1656, Portion 1657, Portion 1662, Portion 1685 and Portion 1696 are within the RPA boundaries and are not included in the Kakadu National Park or any lease to the Director of National Parks.

The Kakadu Aboriginal Land Trust was provided with Aboriginal freehold title of NT Portion 7127 (currently Portion 2273) under the Commonwealth *Aboriginal Land Rights (Northern Territory) Act 1976* on 16 August 2013.

The Jabiluka MLN1 lies on Aboriginal freehold land held by the Jabiluka Aboriginal Land Trust.

2.3.6 Compensation and royalties

Royalty arrangements for Ranger were established in the Ranger Uranium Mining Project – Section 44 Agreement Amendment and Restatement Deed of 14 January 2013 (the 2013 Agreement), which updated the 1978 Ranger Uranium Project Section 44 Agreement (the 1978 Agreement). The 2013 Agreement was part of a suite of agreements between the Commonwealth Government, the NLC and ERA, that were finalised after extensive negotiation.

In general terms, the 2013 suite of agreements provide:

- details of the proportion of Ranger production revenue to be paid to the Commonwealth for distribution to the NT Government and Aboriginal interests
- details of rent payments by ERA to the NLC
- agreement to establish a Relationship Committee between ERA and the GAC to promote information sharing and collaboration including on environmental matters
- various statements of commitment and intent in relation to sacred site management, promotion and preservation of traditional culture and language, employment and training, and business development
- clarification of various roles and responsibilities including the effect of the NT Emergency Response on the RPA and other areas.

The relevant Commonwealth ministers have entered into an agreement under Section 63 of the *Aboriginal Land Rights (Northern Territory) Act 1976*, which determines how much of the royalties paid by ERA go to the Commonwealth or to the Traditional Owners. As outlined on page 99 of ERA's 2023 Annual Report, royalties are calculated on 4.25% of net sales revenue from Ranger mine production, with 1.75% of Ranger sales revenue paid to NT based Aboriginal organisations, including the GAC. The remaining 2.5% of royalties is paid to the Commonwealth and distributed to the NT Government.

Table 2.2 summarises recent financial payments from the Ranger mine.

Table 2.2: Financial payments derived from Ranger operations

Year	Total financial contribution (A\$ M)	Royalty payment (Commonwealth and NT Governments) (A\$ M)	Payments to Aboriginal interests (A\$ M)
2023	-	-	-
2022	1.94	0.44	1.50
2021	9.98	2.25	7.64
2020	12.52	2.85	9.67
2019	11.09	2.52	8.57
2018	10.72	2.48	8.29
2017	11.22	2.55	8.67
2016	14.29	3.25	11.04
2015	17.91	4.07	13.84
2014	15.42	3.51	11.92
2013	18.41	4.18	14.22
2012	20.64	4.69	15.95

Source: ERA Annual Reports 2012–23

The Mirarr people are the Traditional Owners of the land on which both the RPA and Jabiluka are situated. Under the 2013 suite of agreements, the Mirarr receive a proportion of the royalty payments, providing benefit for the Mirarr and the local Indigenous population (and the region). The GAC has reported that financial payments derived from Ranger mine were used for investment, social programs and other projects to address Indigenous disadvantage in the region.

According to its website (mirarr.net), the GAC directs a portion of ERA sourced payments to the Kakadu West Arnhem Social Trust.

2.4 Project history

In 1968, Commonwealth government geologists noted the similarity of the Alligator Rivers region to the Rum Jungle uranium field to the south of Darwin, which led numerous companies into the region despite the area being proposed as a national park. This resulted in a succession of uranium discoveries including Ranger (1969), Koongarra and Nabarlek (1970) and Jabiluka (1971).

In 1968, an Authority to Prospect (AtP 2013) was issued to Peko-Wallsend Operations Limited for the Peko – Electrolytic Zinc Company of Australia Ltd Joint Venture.

The Ranger deposits were first detected by the JV partners during an airborne radiometric geophysical survey in late 1969. Ground reconnaissance and geological mapping supported by a helicopter spectrometer survey confirmed the discovery, resulting in pegging of the first mineral claims. Four anomalies were found within what is now the RPA, while a further anomaly, No. 2, lies to the south and outside the RPA to the north of Mount Brockman. Of the original radiometric anomalies, No. 1 and No. 3 were subsequently delineated to the declaration of Ore Reserves in 1970 and are now known as the No. 1 and No. 3 orebodies, respectively. The No. 4 and No. 5 anomalies initially received only limited attention.

In June 1971, the two companies established Ranger Uranium Mines Pty Ltd to manage and develop the Ranger deposits.

In 1972, project viability was established and negotiation for mining rights to commence mining at Ranger were initiated and sales contracts concluded. In December 1972, a Labor Government was elected which led to deferral of the mining lease while the government defined and implemented a policy of public ownership of certain energy resources, including uranium.

In 1974, in the 'Lodge Agreement', the Commonwealth, Peko and EZ established a JV to mine and process Ranger uranium. The Commonwealth was given a 50% interest in Ranger for a 72.5% contribution to the capital costs, with uranium marketing to be the responsibility of the Commonwealth. An environmental impact statement was to be completed.

In 1975, the Labor Government instituted the Ranger Uranium Environmental Inquiry (also known as the Fox Commission) to resolve various competing interests between Indigenous groups, the national park and the potential for uranium mining.

In the following year, the Fox Commission's first report (released in October 1976) assessed the broad issues around nuclear power and concluded that uranium mining would be acceptable provided it was properly regulated⁶. At the same time, the regulatory framework was established under the Aboriginal Land Rights Act to transfer land to the Traditional Owners. Basic design and cost estimates were also prepared at this time.

In 1977, the second and final report from the Fox Commission was submitted. This report effectively evaluated an environmental assessment process and a land rights claim (for the Indigenous people over the area now known as Kakadu National Park), as well as assessing all of the issues relating to Ranger and the entire Alligator Rivers Region through a public inquiry. It provided the government with the basis to approve the Ranger Project and to allow uranium mining and export to proceed under stringent safeguards. Part of the RPA was declared as Aboriginal land.

In 1978, the Commonwealth Government and the NLC, on behalf of the Traditional Owners, agreed on terms under which mining could proceed. Design and management of the Ranger Project commenced in September 1978.

Authority was granted under the *Atomic Energy Act 1953* to enable the joint venturers to mine, and on-site construction of the Ranger mine and mill commenced in January 1979. Work subsequently commenced on the construction camp and temporary town and facilities. In June 1979, the Ranger mine was opened by then deputy Prime Minister, Doug Anthony. The JV parties appointed Ranger Uranium Mines Pty Ltd (then a wholly owned subsidiary of ERA) as manager of the Project. In August 1979, the Commonwealth Government announced its intention to divest its interest in the Project.

In 1979, Pancontinental Mining Limited (Pancontinental) submitted and received approval from the Commonwealth Government for an Environmental Impact Statement relating to an underground mine and processing facility at Jabiluka.

⁶ The Fox Commission's first report notes that '*the hazards of mining and milling uranium, if those hazards are properly regulated and controlled, are not such to justify a decision not to develop Australian uranium mines*'.

Structures were completed at Ranger in 1980 and mechanical and electrical installation commenced. Open cut mining of the Ranger No. 1 orebody commenced in May 1980. ERA was formed and reached agreement with the Commonwealth of Australia, AAEC, EZ and Peko to acquire all interests in the Ranger Project for A\$407 M. The Company became a publicly listed entity with sales contracts for approximately 88% of the initial design capacity for the first 15 years.

In 1981, construction of the Ranger processing plant was completed, commissioning and plant start-up occurred and the mine became fully operational. Production commenced with the first drum of U₃O₈ produced on 13 August 1981. The processing plant was operating at full production rate in September 1981.

In July 1982, an agreement on mining at Jabiluka was reached between Pancontinental and the NLC with the Jabiluka Mineral Lease subsequently granted in August 1982.

In 1991, ERA purchased the Jabiluka orebody from Pancontinental for A\$125 M. As part of the purchase, the NLC, on behalf of the Traditional Owners assigned Aboriginal approvals to ERA.

In 1993, ERA undertook a feasibility study (FS) on the Jabiluka development, significantly changing the project design from the original Pancontinental plan.

In December 1994, the Ranger No. 1 open pit was exhausted.

In May 1996, final approval to mine the Ranger No. 3 orebody was received from the NT Government, with open cut mining commencing in July 1997.

In October 1996, a new environmental impact statement was submitted for public review outlining two options: mining and milling uranium ore at Jabiluka (similar in concept to the Pancontinental design, that had been approved by Traditional Owners, but with a significantly smaller impact), and trucking Jabiluka ore to the existing Ranger mill for processing.

In June 1997, the environmental impact statement for the Ranger Mill Alternative (RMA) for the development of Jabiluka was forwarded to the NT and Commonwealth Environment Ministers, and was subsequently approved in October 1997 by the Minister for Resources and Energy.

In June 1998, the Public Environment Report on the Jabiluka Mill Alternative (JMA) was issued with a 50/50 option for the disposal of tailings underground and in surface pits. Around the same time, the NT Government authorised construction of the common elements of the RMA and JMA proposals and Stage 1 development of Jabiluka commenced, with excavation of the decline (tunnel) commencing in September 1998.

Final approvals from the NT Government were received in June 1999.

In August 2000, Rio Tinto completed its acquisition and gained control of North Limited, which held a 68.4% interest in ERA.

On 25 February 2005, the Traditional Owners, ERA and the NLC announced the signing of an agreement on the long-term management of the Jabiluka lease area. The Jabiluka LTCMA obliged ERA (and its successors) to secure Mirarr approval prior to any future mining development of uranium deposits at Jabiluka.

In October 2006, ERA announced an increase in defined Ore Reserves at Ranger extending the projected life of Ranger by 6 years from at least 2014 to 2020.

Cyclonic rainfall in early 2007 impacted open pit operations, and led to further evaluation and exploration of Ranger, in particular resource extension to the east and at depth to the southeast of the Ranger 3 open pit. In September 2007, ERA approved the extension of the Ranger 3 operating pit and reported updated reserves and resources for the project.

In November 2008, ERA defined an Exploration Target at R3D, based on exploration and completed drilling; the target was potentially able to underpin a further expansion via underground mining. The Company halted further studies while investigating open pit expansion opportunities due to the depth of the mineralisation.

In 2009, ERA conducted a PFS for the development of a heap leach facility with a nominal capacity of 10 Mtpa of lower grade ore. On 16 March 2009, ERA formally applied for statutory approval for a heap leach facility. An FS for the heap leach was completed in late 2010.

In early December 2012, ERA completed open cut mining at Ranger 3, with backfilling of the pit expected to be completed by late 2014.

In January 2013, ERA formally commenced a statutory approval process for the R3D exploration decline and underground mine. In May 2013, ERA commenced the R3D PFS and by June 2013, the R3D decline had reportedly reached 1,000 m in length (ultimately extending to 2,700 m in length and 450 m depth below surface).

In September 2013, ERA opened the new brine concentrator at Ranger which was expected to help treat water and to progressively rehabilitate the site.

In June 2014, ERA announced updated Mineral Resources for R3D as part of the ongoing PFS, which was followed by further updates in September 2014 and February 2015. An environmental impact study (EIS) for R3D was lodged in September 2014. Rehabilitation of the RPA continued during the December 2014 quarter, when infrastructure to enable Pit 3 to receive tailings for final deposition was installed.

In June 2015, ERA decided it would not proceed with the final FS for the R3D project in the prevailing operating environment. The decision was driven by two factors: no improvement in the uranium market and uncertainty regarding the market's future; and the PFS indicated that the economics of the project required operations beyond the current Ranger Authority, which was due to expire in 2021. Rio Tinto agreed with the decision not to progress the study, but did not support the logic of any further study or future development of R3D due to the project's economic challenges. In late June 2015, ERA assessed whether the R3D asset may be impaired in the light of Rio Tinto's differing view on the future development of R3D. ERA planned to continue discussions relevant to R3D with the Traditional Owners and the Commonwealth Government, but three directors resigned in response to the difficulties ERA faced in pursuing its stated approach without the support of its major shareholder. In early July 2015, ERA updated the R3D resource model as part of the R3D PFS.

During the March 2016 quarter, ERA announced that progressive rehabilitation of the RPA continued, including the completion of laterite capping for Pit 1. The Ranger 3 Deeps exploration decline remained under care and maintenance. In April 2016, ERA entered into a A\$100 M credit facility agreement with Rio Tinto Limited; the funds to be used for rehabilitation obligations on the Ranger Project. The funding was conditional on ERA making no expenditure on the R3D Project without Rio Tinto's consent, apart from care and maintenance expenditure. In May 2016, ERA

concluded a strategic review of its business and determined three near-term strategic priorities: progressive rehabilitation of Ranger; maximise the generation of cash flow from the processing of stockpiled ore; preserve the option for the future development of R3D.

In January 2017, ERA reported an updated Ore Reserve and Mineral Resource estimate at Ranger. In August 2017, ERA reported that backfill of Pit 1 had started at Ranger. ERA reported that the rehabilitation FS that started in the final quarter of 2017 was expected to be completed by the third quarter of 2018.

In June 2018, ERA released its Mine Closure Plan for Ranger.

In February 2019, ERA announced the finalisation of the closure FS for the rehabilitation of Ranger. The approval and implementation of the FS resulted in an increase in the rehabilitation provision from A\$526 M to A\$830 M.

Production at the Ranger mine ceased after 40 years of operations in accordance with the Ranger Authority on 8 January 2021. In February 2021, ERA announced that reserves were depleted and no Ore Reserves and Mineral Resources remained at Ranger. ERA also announced that no work was being conducted on further development options for the R3D deposit.

During the March 2021 quarter, ERA completed the tailings transfer to Pit 3 and commenced the final design of the Pit 3 wicking, capping, and bulk backfill works. This work was supported by a number of tailings characterisation studies.

In July 2021, ERA announced it was reforecasting both the cost and schedule in relation to the rehabilitation provision over the RPA and that there were likely to be overruns.

On 2 February 2022, ERA reported a revised total cost based on Option A (subaqueous capping of Ranger 3 open pit) of between A\$1.6 Bn and A\$2.2 Bn for the RPA rehabilitation (relative to the A\$973 M⁷ outlined in the Rehabilitation FS as announced on 8 February 2019), and which was expected to be completed between the 2027 to 2028 December quarters.

The sale of ERA's last drum of U₃O₈ from the RPA was concluded on 31 May 2022.

In May 2022, ERA commenced an FS update in connection with a lower technical risk rehabilitation methodology (primarily relating to the subaerial capping of Pit 3) and to further define the RPA rehabilitation cost and schedule.

On 9 September 2022, an amending bill to the *Atomic Energy Act 1953* was introduced to Federal Parliament seeking to give ERA additional time to rehabilitate the RPA beyond the stipulated date of 8 January 2026. The amended Act was passed on 24 November 2024.

ERA's recent production history is summarised in Table 2.3.

⁷ Based on 31 December 2018 rehabilitation provision A\$973 M undiscounted in nominal terms, excluding not yet recognised termination benefits and including an allowance of A\$1 M in relation to the estimated cost of Jabiluka ML rehabilitation expense.

Table 2.3: Recent production at Ranger

Year	Ore mined (Mt)	Ore milled (Mt)	Mill head grade (% U ₃ O ₈)	Mill recovery (%)	Production (t U ₃ O ₈)	Drummed sales – Ranger concentrates (t U ₃ O ₈)	Sales – other concentrates (t U ₃ O ₈)	Sales – total (t U ₃ O ₈)
2021	-	0.02	0.07	86.1	34	1,302	-	1,302
2020	-	2.5	0.07	84.9	1,574	1,711	10	1,721
2019	-	2.5	0.08	86.8	1,751	1,577	20	1,597
2018	-	2.5	0.09	86.6	1,999	1,467	-	1,467
2017	-	2.6	0.10	84.7	2,294	2,089	-	2,089
2016	-	2.7	0.10	84.9	2,351	2,130	9	2,139
2015	-	2.5	0.10	82.0	2,005	2,183	-	2,183
2014	-	1.3	0.11	81.5	1,165	2,164	984	3,148
2013	-	2.3	0.15	84.8	2,960	2,767	48	2,815
2012	3.8	2.6	0.17	86.2	3,710	2,665	558	3,223

Source: ERA Annual Report 2021, S&P Capital IQ Pro

2.5 Regional geological setting

Ranger and Jabiluka are two of the major uranium deposits of the Pine Creek Geosyncline, a Lower Proterozoic basin extending over a 66,000 km² area to the south and east of Darwin in Australia's NT. The Pine Creek Geosyncline has been draped over mixed Archaean and Archaean-Lower Proterozoic granitoid and gneissic basement. It is surrounded and partly covered by younger sedimentary basins, from Middle Proterozoic to Mesozoic in age, and is largely covered by Cenozoic sediments (Figure 2.3).

The oldest rocks in the region consist of medium- to coarse-grained granite and leucogneiss in the core of the Nanambu Complex. The unconformably overlying Cahill Formation, the main host to the known uranium mineralisation, is interpreted to reach a maximum thickness of 3,000 m. It is described as a carbonate carbonaceous – pelitic lower unit and a more psammitic upper unit, both containing amphibolite-grade schist as the major rock type. Unconformably overlying the Cahill Formation is the Kombolgie Formation. The middle Proterozoic Kombolgie Formation is divided into upper and lower sandstone units by amygdaloidal basalts of the Nungbalgarri Member. The lower unit tends to be coarser grained, and less homogeneous, with conglomerate beds and thin siltstone interbeds. Cross-bedding and ripple marks are common.

Uranium mineralisation at Jabiluka and Ranger is focused along the unconformable contact between the Cahill Formation and the overlying Kombolgie Formation.

Deposit model

The ERA deposits (including R3D, Jabiluka and exploration targets) belong to a class of deposits termed unconformity related uranium deposits. Unconformity related uranium deposits are typically higher grade and have some of the largest uranium inventories in the world. Historically these deposits have been significant sources of production, and they account for around 25% of total world uranium production (IAEA, 2018).

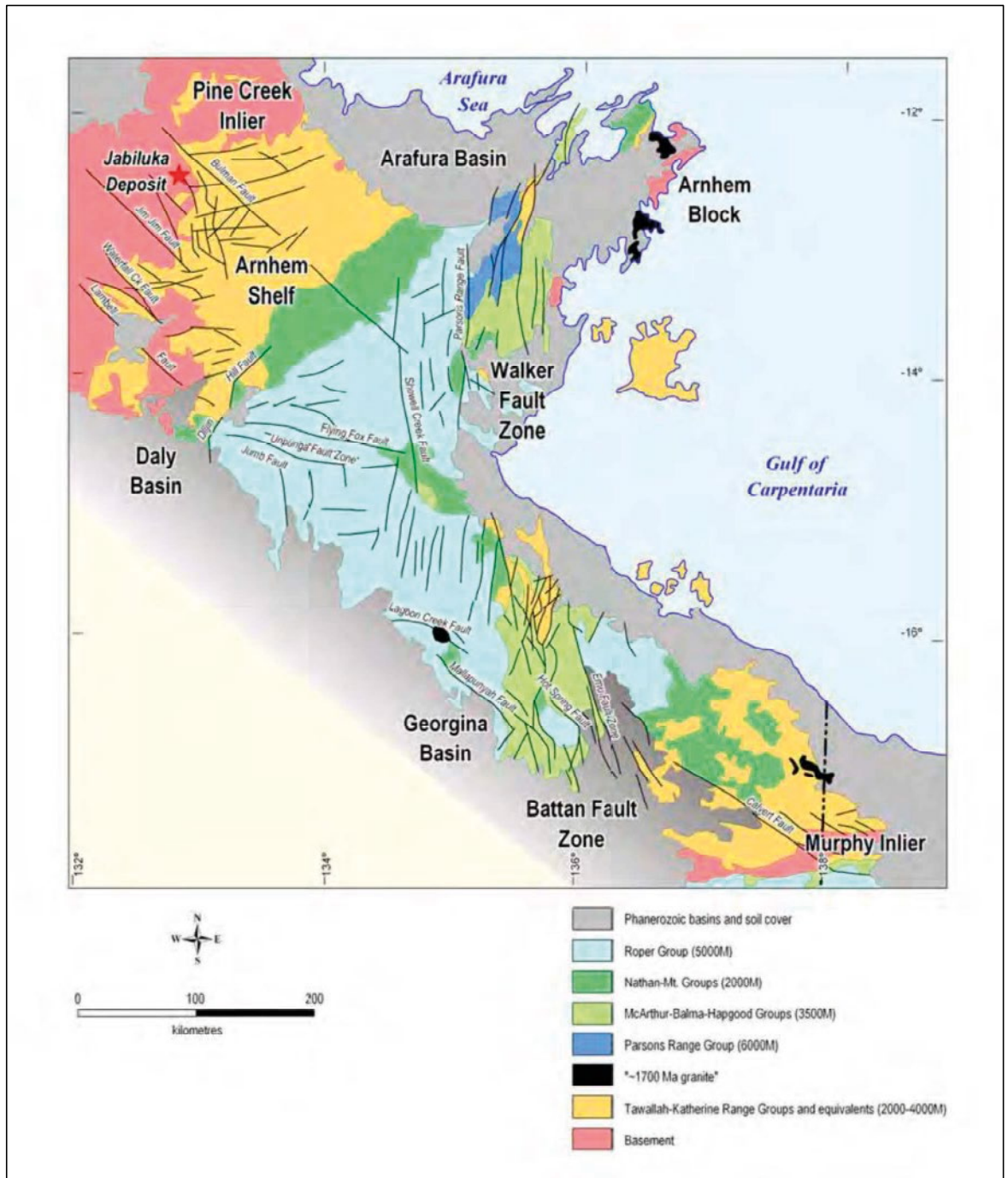
An unconformity is defined as a contact between two rock units which represents a break in the geological record and is so called as the ages of the layers of rocks that are abutting are discontinuous. Unconformity related uranium deposits form when uranium enriched fluids reach the unconformity where they encounter an abrupt change in geochemistry, forcing the uranium in the fluids to precipitate as uranium minerals. Unconformity related deposits are associated with fault systems, which play a role in the ore-forming process by providing a conduit for fluids to cross the unconformity.

The Pine Creek Geosyncline contains a variety of known uranium deposits and occurrences with the most important type being unconformity related. There are three main known areas of unconformity-type uranium deposits, being the Rum Jungle field in the western sector, the South Alligator Valley field in the south, and the Alligator River uranium field in the northeast. The Alligator River uranium field contains the prominent deposits of Ranger, Jabiluka, Koongarra and Nabarlek.

Mineralisation

Uraninite (UO_2 with some U_3O_8) represents the most important uranium mineral and is typically accompanied by lesser but variable amounts of coffinite ($\text{U}(\text{SiO}_4)_{1-x}(\text{OH})_{4x}$) and brannerite (UTi_2O_6). Other uranium-bearing minerals are also present but are not usually volumetrically significant and are localised in their occurrence. These include schoepite, curite and uranopilite as well as uranium-bearing carbonaceous material or kerogen.

Figure 2.3: Regional geology of the Pine Creek Inlier relative to other North Australian basins



Source: ERA (2022) – 2021 CP report

3 Ranger Project

3.1 Overview

For more than 40 years, ERA produced uranium oxide from the Ranger mine for the global nuclear energy market. Historically, in excess of 291 Mlb or 132,000 t of U_3O_8 has been produced at Ranger, with ore derived from two main open pits known as Pit 1 (mined from May 1980 to December 1994) and Pit 3 (mined from July 1997 to November 2012).

Historically, mining at Ranger consisted of a conventional open pit operation using front-end loaders and haul trucks. Benches were 7 m in height with two benches being combined for the mining of waste. Initial mining at Pit 1 was planned at the rate of 4 Mtpa, of which 1.15 Mtpa was ore, with the remainder being waste and mineralised waste below ore grade (0.10% U_3O_8). Mined material was categorised by a discriminator, which measured the uranium grade for either stockpiling or immediate processing. All material above 0.02% uranium and below 0.10% was stockpiled as low-grade ore for possible subsequent recovery of uranium. Lateritic and weathered materials were stockpiled separately for subsequent treatment in the mill. Initially a 15% weathered/85% primary blend was milled but this changed towards an increased amount of weathered ore as operational experience was gained, before transitioning to fresh ores only. Low-grade ore and non-mineralised rock were stockpiled and returned as backfill to the mined-out pits prior to contouring to create the final landform.

The Ranger mill was conventional in design using equipment of proven reliability at the time of initial construction. The plant incorporated three stage crushing followed by an open circuit rod mill and closed circuit ball milling. The ground ore was treated with sulfuric acid and pyrolusite to dissolve the contained uranium and the uranium bearing solution separated from the barren pulp by countercurrent decantation (CCD) in a series of rubber lined thickeners. The tailings were neutralised with lime and pumped to the tailings dam. Uranium was recovered from the acidic solution by extraction into an organic liquor with the aqueous acidic solution being returned to the earlier part of the circuit. Yellowcake (ammonium diuranate) was precipitated for the organic solution by the addition of ammonia and the precipitate washed, centrifuged and roasted to yield a calcined concentrate containing in excess of 90% U_3O_8 . The product was packed into 200 L steel drums that were sealed and transported by road to a secure holding facility using an accredited transport company and then exported by ship.

ERA had a sales and marketing agreement with Rio Tinto Uranium, pursuant to which ERA's product, drummed uranium oxide, was sold to international power utilities under strict international and Australian Government safeguards, which ensured that Australian uranium was only used for peaceful purposes. ERA sold its product to power utilities in Asia, Europe and North America. Production of uranium oxide ceased in line with the Ranger Authority on 8 January 2021.

Rehabilitation has been ongoing at Ranger for more than 30 years. A staged backfill of Pit 1 commenced in 1996 with the tailings being deposited into the pit over an 8 year period, with a laterite cap completed in January 2016. The constructed landform at Pit 1 was completed in 2019 and initial revegetation works were completed in 2021.

Soon after mining ceased in Pit 3 in November 2012, the backfilling of that pit commenced using an underfill methodology to provide space for brine injection in support of the long-term storage of

brine from the Brine Concentrator operations. Tailings from the mill and tailings storage facility were deposited directly into Pit 3, and the tailings previously stored in the tailing storage facility (TSF) were transferred to Pit 3. It is currently estimated that completion of dry capping at Pit 3 will continue until mid-2027. Following consolidation (which is predicted to occur over approximately 5 years after final placement of backfill), waste rock will be used to create the final landforms prior to revegetation.

3.2 Permitting and approvals

This section provides an overview of the land access consents and environmental permitting for the Ranger Project. Land access is not administered under environmental legislation, but the access and mining agreements executed under the *Atomic Energy Act 1953* (as amended) and the *Aboriginal Land Rights (Northern Territory) Act 1976* include environmental requirements that affect permits issued under NT and Commonwealth environmental legislation (for example, under the Ranger mining management plan approved under the Northern Territory *Mining Management Act 2001*).

3.2.1 Land access and mining rights

The RPA lies within the traditional lands of the Mirarr People, on freehold Aboriginal land (NT Portion 000; Parcel 7127) scheduled under the *Aboriginal Land Rights (Northern Territory) Act 1976*. The Kakadu Aboriginal Land Trust is the owner of the freehold land, acting for the benefit of Aboriginal people entitled by Aboriginal tradition to the use or occupation of the land. The land is held in fee simple: it cannot be sold by the Kakadu Aboriginal Land Trust. Kakadu National Park, which was established in three stages between 1979 and 1991, surrounds but does not include the RPA, which has been excised from the park.

The Kakadu Aboriginal Land Trust acts on the direction of the NLC, one of four land councils established under the *Aboriginal Land Rights (Northern Territory) Act 1976*. The NLC has a special role as an entity authorised to negotiate land access agreements and authorities to mine under Section 41 of the *Atomic Energy Act 1953* and Part IV of the *Aboriginal Land Rights Act*. The NLC was a signatory to a 'Section 41 Authority' initially executed in January 1979, in which Peko-Wallsend Operations Ltd, Electrolytic Zinc Company of Australasia Limited and the AAEC were jointly issued an authority to mine in the RPA, with an expiry date of 9 January 2005. The authority was subsequently assigned to ERA in September 1980. In December 1995, ERA applied to extend the authorised mining period. An extension to the authority was granted in November 1999, subject to a range of conditions set out in the Schedule to the Section 41 Authority. The current mining authority is set to expire on 9 January 2026. Under the conditions of the current Section 41 Authority, ERA was required to cease all mining operations permitted under the Authority by 8 January 2021. Clause 5.2 of the Authority stipulates that ERA's rights to access, occupy or use⁸ the RPA expire on 8 January 2026 (unless terminated earlier through revocation of the Authority or completion of 'final close-out' (completion of environmental requirements)). On 27 May 2024, ERA

⁸ Access for ongoing monitoring activities appear to be allowed after the expiry of the Agreement. Monitoring is required until a close-out certificate is issued by the Supervising Authority. The 2023 Mine Closure Implementation Schedule for Ranger assumes post-closure monitoring of rehabilitation will continue until at least 2061.

applied for a new Rehabilitation Authority under Section 41CA of the amended Atomic Energy Act. No new Section 41 Authority has been approved as at the date of this report.

A key element of the Section 41 Authority is Appendix A: *Environmental Requirements of the Commonwealth of Australia for the Operation of the Ranger Uranium Mine*. The appendix specifies a set of 'primary environmental objectives' relating to i) environmental protection and ii) mine rehabilitation and defines a framework for the eventual 'close out' of environmental obligations, subject to the attainment of the primary environmental protection and rehabilitation objectives.

The primary environmental protection objectives specified in the Section 41 Authority are to:

- maintain the attributes for which Kakadu National Park was inscribed on the World Heritage list
- maintain the ecosystem health of the wetlands [within stages I and II of Kakadu National Park] listed under the Ramsar Convention on Wetlands
- protect the health of Aboriginal people and other members of the regional community
- maintain the natural biological diversity and ecological processes of aquatic and terrestrial ecosystems of the Alligator Rivers Region.

The Section 41 Authority also includes a range of 'secondary environmental objectives' relating to water quality; air quality; radiological protection; storage, use and disposal of hazardous substances/wastes; management of excavated material; blasting; protection of vegetation, fauna and soil; tailings management and mine rehabilitation.

The rehabilitation objectives specified in the Section 41 Authority are to:

- revegetate disturbed areas of the RPA using native plant species to achieve a density and abundance similar to those existing in adjacent areas of Kakadu National Park and establish an ecosystem, the long-term viability of which would not require a maintenance regime significantly different from that appropriate to adjacent areas of the park
- establish radiological conditions on areas impacted by mining such that the health risk to members of the public, including traditional owners, is as low as reasonably achievable and members of the public do not receive a radiation dose which exceeds applicable limits recommended by the most recently published and relevant Australian standards, codes of practice, and guidelines, while minimising restrictions on the use of the area
- establish erosion characteristics in rehabilitated areas which, as far as can reasonably be achieved, do not vary significantly from those of comparable landforms in surrounding undisturbed areas.

The broad rehabilitation objectives set out in the 'Environmental Requirements' are not sufficiently specific to serve as a practical basis for objectively assessing rehabilitation performance. Completion criteria have been developed by ERA or recommended by the Commonwealth Office of the Supervising Scientist (OSS) to link between the statutory requirements of the *Atomic Energy Act 1953* and the regulatory framework administered under the Northern Territory *Mining Management Act 2018* or under the *Environment Protection Act 2019*, as amended by the *Environment Protection Legislation Amendment Act 2023*. More than fifty environmental performance criteria have been proposed and now form the working basis for assessing rehabilitation success at Ranger (Table 3.1).

Table 3.1: Ranger rehabilitation criteria

Aspect	Criteria
Landform	
Erosion	Average erosion rate: modelling of erosion on the constructed landform demonstrates that the denudation rate will approach the background rate of 0.075 mm/a.
Surface water turbidity downstream of RPA	Turbidity in watercourses: For Magela and Gulungul Creeks, the difference in net annual turbidity between sites located upstream of the mine- site and downstream at the boundary of the RPA, is similar to background values over five consecutive wet seasons in the absence of active sediment control.
Isolation of tailings	As-built landform: a high-resolution digital elevation model of the constructed landform matches the approved landform design, within applicable construction standards. Erosion rates and distribution: modelling of erosion on the constructed landform matches results of erosion modelling conducted on the approved landform design and confirms tailings will not be exposed for 10,000 years. Concentrated erosion features: gully formation will not expose buried tailings.
Water and sediment	
Human use and enjoyment of water	Water quality off the RPA meets the National Drinking Water Health Guidelines at those water bodies and times used by Traditional Owners for drinking (to be confirmed): NO ₂ ≤ 3 mg/L , SO ₄ 500 mg/L, Mn 500 µg/L, NO ₃ 50 mg/L, U 17 µg/L. Water quality off the RPA meets the National Recreational Guidelines for secondary contact at those water bodies and times used by Traditional Owners for drinking (to be confirmed): NO ₃ 500 mg/L, NO ₂ 30 mg/L, U 170 µg/L, Mn 5 mg/L, SO ₄ 400 mg/L. Visual appearance of water: No mine related change causes turbidity to be statistically significantly increased over natural background values. Visual appearance and smell of water: oil and petrochemicals not to be noticeable as a visible film on the water or be detectable by odour.
Toxicity of water to aquatic organisms	OSS Rehabilitation Standards are met in Magela and Gulungul creeks off the RPA: Dissolved total ammonia nitrogen; 0.4 mg/L (pH and temperature dependant) Dissolved magnesium; 2.9 mg/L (72-hour moving average) Dissolved magnesium to calcium (Mg:Ca) mass ratio; no greater than 9:1 Dissolved sulfate; 10 mg/L (seasonal average) Dissolved uranium; 2.8 µg/L (72-hour moving average) Dissolved manganese; 75 µg/L (72-hour moving average) Dissolved copper; 0.5 µg/L (72-hour moving average) Dissolved zinc; 1.5 µg/L (72-hour moving average).
Sediment quality	Uranium in sediments does not exceed 100 mg/kg dry weight (whole sediment; weak acid extractable digestion method).
Ecosystem health outside the RPA ¹	Nutrients in mine derived analytes from surface or ground waters discharged to surface waters off the RPA do not cause detrimental impact to the ecosystem (Criteria not yet determined in terms of concentration in water). There will be no detrimental environmental impact from tailings contaminants in surface or ground waters discharged to surface waters off the RPA for at least 10,000 years.
Water and sediment quality within the RPA ¹	Surface water and sediment quality on the RPA is demonstrated to be as low as reasonably achievable (ALARA).
Bush tucker ¹	Local diet model demonstrates that ingestion of mine derived constituents of potential concern via aquatic and terrestrial bush foods and drinking water does not cause annual intakes to exceed any relevant national/international tolerable intake levels.
Soils	
Contaminants in soils	Uranium and manganese concentrations in land application areas: Demonstrate risk is ALARA. Constituents of potential concern in other areas: demonstrate risk is ALARA.
Ecosystems	
Species composition	Relative species abundance (overstorey vegetation): The contribution in relative abundance of species in overstorey assemblages is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Species richness: The total number of (i) overstorey species; and (ii) understorey species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Total species abundance: The total abundance of (i) overstorey species; and (ii) understorey species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s).
Vegetation structure and cover	Vegetation structure: Size class distribution of overstorey is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Canopy cover (overstorey and midstorey): The percentage canopy cover distribution for overstorey and midstorey species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Canopy cover (understorey species): Percentage cover of understorey vegetation is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s).
Vertebrate fauna	Fauna relative abundance (mammals, birds and reptiles): relative abundances of i) mammal (including bats); ii) bird; and iii) reptile species are statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Species richness (mammals, birds and reptiles): The total numbers of: i) mammal (including bats); ii) bird; and iii) reptile species are statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Species abundance (mammals, birds and reptiles): The total abundance of: i) mammals (including bats); ii) birds; and iii) reptiles are statistically similar to, or on a trajectory towards, that of the reference ecosystem(s).
Threatened vertebrate fauna	Fauna relative abundance (threatened vertebrate species): relative abundance of targeted threatened fauna species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Species abundance (threatened vertebrate species): Total abundance of targeted threatened vertebrate species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). [‘Targeted species’ is not defined.]
Native ants	Relative abundance: relative abundance of species in native ant assemblages is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Species richness: the total number of native ant species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s). Species abundance: the total number of individuals of native ant species is statistically similar to, or on a trajectory towards, that of the reference ecosystem(s).
External exchanges (vegetation dispersing fauna)	Total number of individuals of: i) nectivorous; and ii) frugivorous bird species are statistically similar to, or on a trajectory towards, that of the reference ecosystem(s).
Ecosystem function (habitat availability)	Habitat for fauna is, or indicators of habitat formation are, present.
Ecosystem function (nutrient cycling)	Litter decomposition rates necessary for supporting ecological processes are consistent with, and within the ranges of, those reported for northern savanna ecosystems. Appropriate soil microbial community functions that support nutrient cycling are present. Soil organic carbon and nitrogen are accumulating at a rate necessary for supporting ecological processes. Soil mineral nitrogen and soluble organic nitrogen stocks and rates of mobilisation are at a level necessary to support ecological processes.

Aspect	Criteria
Ecosystem function (resilience to fire, extreme weather events, pests/disease)	Following implementation of an appropriate fire regime, all other closure criteria must be shown to have been met, demonstrating recovery.
	Post-fire mortality rates of juvenile and adult overstorey species do not exceed those of the reference ecosystem.
	In the event of natural disturbances (e.g. wind, drought, or disease), all other closure criteria must be shown to have been met, demonstrating recovery.
Weeds and exotic fauna	Class A and/or Weeds of National Significance are either absent from the Ranger Rehabilitation Project Area or have been eradicated from within the RPA for a period of time that exceeds the seed bank longevity of any given species.
	Weed abundance: the incidence and abundance of all Class B weeds within the RPA is no greater than the reference ecosystem, at a landscape-scale.
	Weed abundance: the presence and abundance of other introduced flora within the RPA is no greater than those in adjacent areas of Kakadu National Park.
	The total abundance of: i) buffalo; ii) horses; iii) pigs; iv) cats; and any other fauna where there is a legislative requirement for control on the Ranger Rehabilitation Project Area are no greater than adjacent areas of Kakadu National Park.
Radiation	
Radiation dose to members of public	With agreed land use restrictions in place, the total above-baseline radiation dose from pathways including external gamma; inhalation of radon decay products (RDP); inhalation of dust; ingestion of bush food (including water) does not exceed 0.3 mSv/a.
Radiation dose to members of public	In the absence of effective agreed land use restrictions, the total above-baseline radiation dose from pathways including external gamma; inhalation of radon decay products (RDP); inhalation of dust; ingestion of bush food (including water) does not exceed 1 mSv/a.
Radiation exposure for terrestrial biota	Total above-baseline absorbed dose rates to the most highly exposed terrestrial plants and animals does not exceed 100 µGy/h.
Radiation exposure for aquatic biota	Total above-baseline absorbed dose rates to the most highly exposed aquatic plants and animals does not exceed 400 µGy/h.
Cultural	
Land use and landform	Size of rocks: surface rock suitability verified by Bininj ² monitoring.
	Erosion: limited to very minor concerns and only in small areas (verified by Bininj monitoring).
	'Traversability': limited to minor difficulties, few in number (verified by Bininj monitoring).
	Aesthetic: natural aesthetic verified by Bininj monitoring. Most areas look natural, limit of a few not satisfactory.
	Landform design: Visual connection with key cultural sites verified by Bininj monitoring – sites visible from the same areas and to the same extent as prior to disturbance.
Vegetation	Growth rate: verified by Bininj monitoring – relative to the number of seasons, the growth of plants across all areas is satisfactory and is improving.
	Species diversity: verified by Bininj – all of the expected species are present in a natural combination in nearly all of the area.
	Species types: verified by Bininj – all of the species are correct for nearly all ecological zones.
	Weed presence/absence: weeds verified by Bininj – weeds are present in only a minor portion of the area, low level of concern.
Water and sediment	Artificial water bodies: Absence of water bodies verified by Bininj monitoring – no artificial water bodies present.
	Water quality and flow (based on visual assessment): Water quality verified by Bininj monitoring – water appears to be of high quality in most areas, only very minor water quality concerns.
	Condition of riparian areas: Watercourse margins and creek banks verified by Bininj monitoring – appear to be in a natural condition in most of the area, only minor concerns.
Biodiversity (not specified whether flora, fauna or both)	Species number and diversity: numbers and diversity of natural species occurring according to expectations for natural rate relative to the number of seasons and is improving (verified by Bininj monitoring).

Source: ERA Ranger Mine Closure Plan, October 2024

Notes:

¹ Objectives for water and/or sediment attributes in greyed out rows are still under review and specific criteria have not yet been defined.

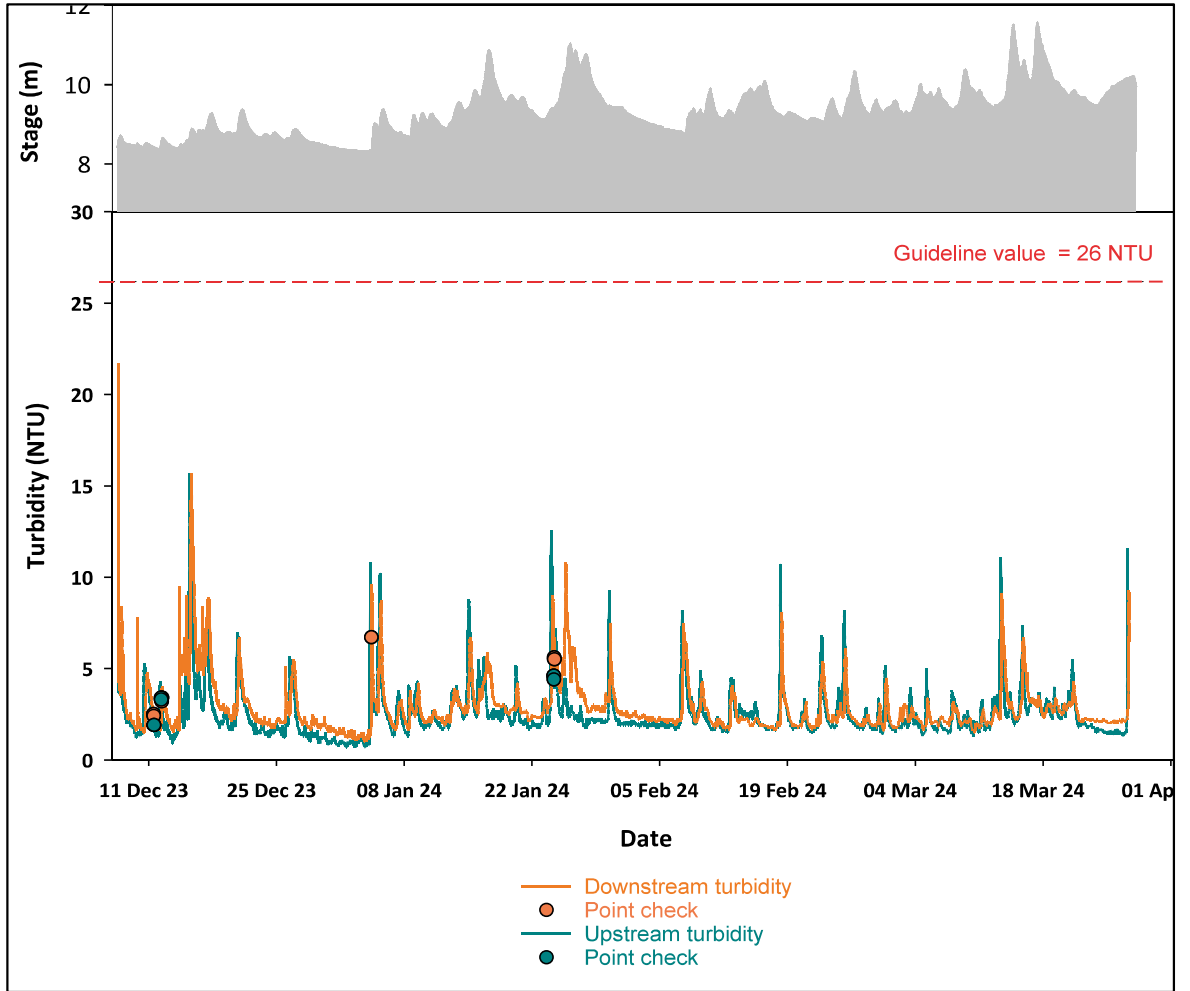
² The term 'Bininj' as used in the Ranger mine closure plan means a speaker of Bininj Kunwok languages and/or a person of local Aboriginal descent.

In addition to the conventional, technical mine rehabilitation criteria for which government approval is required, a separate set of 'cultural closure criteria' has been developed on the advice of Traditional Owners. These criteria, which do not require government approval, are largely qualitative and address a range of environmental attributes, ranging from trafficability of the land surface to vegetation health, biodiversity, water quality, erosion susceptibility and aesthetic values. No procedure or protocol for how the 'cultural' criteria (which are largely subjective) will be applied in practice has yet been agreed.

Most of the criteria have been formally approved by the Commonwealth administering authority and agreed with Traditional Owners, although it appears that some criteria are still under discussion or assessment. In its review of the 2023 Ranger mine closure plan, the Office of the Supervising Scientist has recommended additional criteria, for example a criterion relating to the concentration of aluminium in surface water and a metric comparing groundwater observations with groundwater conditions predicted through hydrogeological modelling.

Overall, the completion criteria are notable for their stringency. The criteria generally aim to achieve either a 'no observed effect' level or to establish conditions that do not deviate materially from the environmental conditions believed to have existed prior to any mining development at Ranger. These are exceptionally ambitious goals, and in SRK's view, there must be serious doubts as to whether such outcomes are achievable. This is particularly the case for 'ecosystem' criteria which are largely untested. That said, recent water quality reports published by the OSS show that surface waters downstream of the Ranger site generally comply with the recommended water quality criteria and do not show material differences to water quality upstream of the Ranger site. Results for turbidity and magnesium in surface waters during the 2023/2024 wet season are shown in Figure 3.1 and Figure 3.2 by way of example.

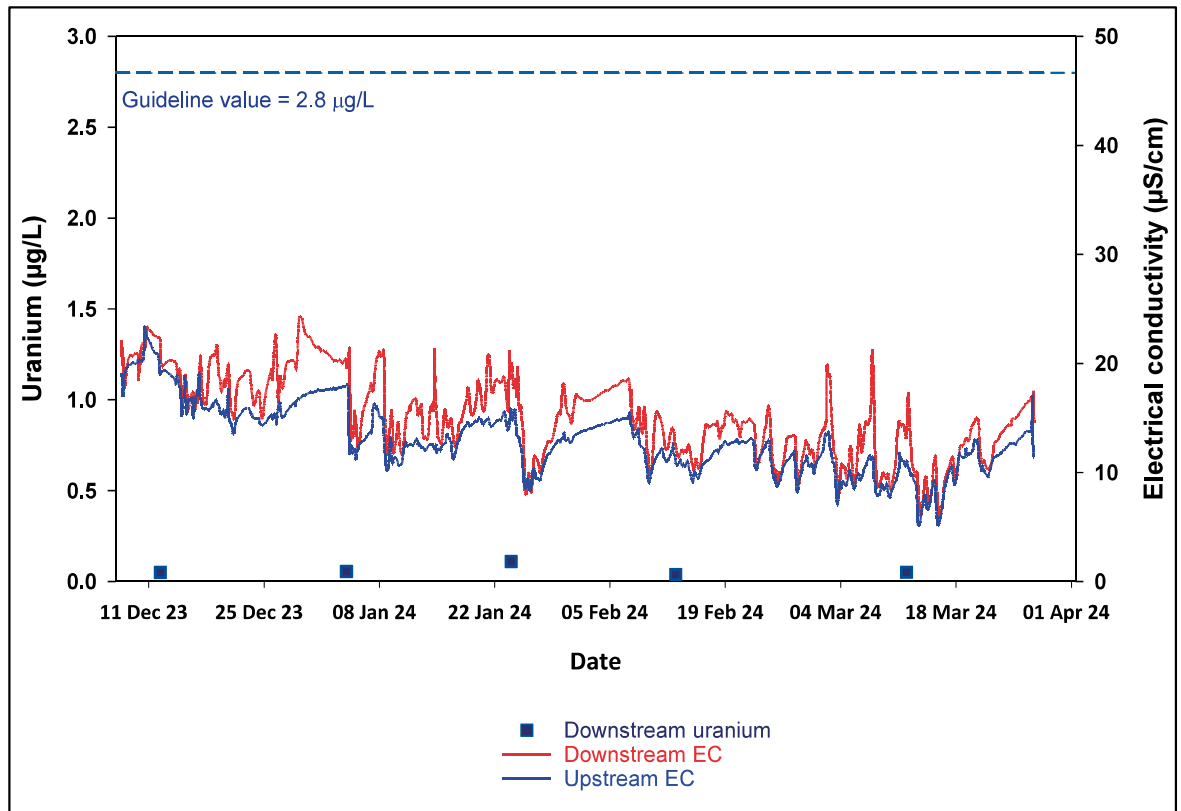
Figure 3.1: Turbidity in Magela Creek – 2023/24 wet season



Source: Office of Supervising Scientist 2024

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Figure 3.2: Dissolved uranium in Magela Creek – 2023/24 wet season



Source: Office of Supervising Scientist 2024

It is now evident that mine rehabilitation works cannot be completed by 8 January 2026. ERA has applied for a new Section 41 Authority under the amended Atomic Energy Act. The Authority had not been granted at the time of writing. It is possible that the Environmental Requirements in Appendix A of the Authority will be revised as part of the development of a new Authority, however, Paragraph 41CE(1)(b) of the amended Act stipulates that any rehabilitation requirements imposed by a Rehabilitation Authority issued under the amended Act would have to be substantially similar to the environmental requirements imposed 'by the historic Section 41 Authority'.

3.2.2 Environment approvals and permits

Potential environmental and social impacts of the Ranger Project were assessed between 1975 and 1977 by a committee of inquiry established under the Commonwealth *Environmental Protection (Impact of Proposal) Act 1974* (which has since been repealed and replaced by the *Environment Protection and Biodiversity Conservation Act 1999*). The project was approved in January 1979.

Environmental aspects of operations at the Ranger mine are regulated under both NT and Australian Commonwealth legislation and regulations. The key instrument that governs day-to-day operations at Ranger is 'the Ranger Authorisation' (0108), an approval issued under the NT's *Mining Management Act 2001*. The most recent variation of Authorisation 0108 was issued on 22 June 2018. It includes an annex (Annex B) setting out the process for the submission and assessment of a MCP in accordance with Section 34 of the *Mining Management Act 2001*. Given that active mining operations at Ranger ceased in 2021, the main focus of government oversight is now on mine rehabilitation activities. The Ranger MCP is required to be reviewed and updated annually on or before 1 October each year. The most recent MCP for the Ranger operation was

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submitted to the NT and Commonwealth governments on 1 October 2024. It has not yet been formally approved.

The Supervising Scientist provides independent advice to the Commonwealth Minister for Resources and Northern Australia and the NT Minister for Primary Industry and Resources on the adequacy of the Ranger MCP and the acceptability (or otherwise) of mine closure criteria. In its most recent report on the 2023 MCP (Supervising Scientist, May 2024), the Supervising Scientist concluded that the plan does not yet provide sufficient evidence to demonstrate that the rehabilitation works proposed will satisfy the Environmental Requirements. The following matters requiring further development were specifically mentioned:

- final landform construction and long-term management is at a conceptual design stage only: ERA is required to submit a detailed Final Landform Application in 2026
- significant additional studies are required on ecosystem establishment
- further studies are required to address uncertainty in the potential aquatic ecosystem risks from the water and sediment pathways
- a whole of site radiation dose assessment is required to be prepared as part of the final landform application.

The key requirement of the rehabilitation of the RPA is the creation of a final landform and sustainable environment that could be incorporated into the Kakadu National Park, should the Traditional Owners and other relevant authorities so wish.

ERA obtained a 'Permit to Decommission Facility' on 8 January 2021 under the *Nuclear Non-Proliferation (Safeguards) Act 1987* from the Australian Safeguards and Non-Proliferation Office (ASNO). Decommissioning works proceeded following the receipt of the permit. Further government consultation and approvals will be required before ERA can implement specific closure activities, including, for example demolition of the former processing plant, final landform works and Pit 3 closure works (for example, placement of demolition waste from the processing plant and other site infrastructure in the pit void; bulk backfill of waste rock). Separate approvals will be required in relation to deconstructing the Ranger water dam and establishing a final landform.

3.3 Stakeholder engagement

ERA has for many years engaged with stakeholders through both formal and informal meetings and is a regular participant in meetings with traditional owner representatives and local, territory and federal governments. A range of committees, working groups and other consultative groups have been established to provide forums for the exchange of views and information. Many of the committees also provide opportunities for attendance by interested parties who are not part of the formal committee structure. Table 3.2 lists examples of the committees and other formal meeting structures in which ERA participates.

In recent times (since about 2023) engagement between ERA and Traditional Owners appears to have been sporadic and difficult. During interviews conducted as part of SRK's site visit in February 2025, the leader of the Ranger Rehabilitation Project, Mr Alex Jones, expressed optimism about the potential for constructive engagement with the Mirarr. The legal representative for the Traditional Owners, Ms Susan O'Sullivan (who participated in a 1-hour online discussion with SRK), rejected the suggestion that the Mirarr were unwilling to meet with ERA, while reiterating that Traditional Owners have been consistent in their opposition to mining at Jabiluka.

Table 3.2: Stakeholder engagement forums – Ranger Project

Engagement forum	Frequency	Purpose	Participants
Minesite Technical Committee (MTC)	At least annually (additional meetings held as required)	To discuss and resolve technical environmental management matters relating to the operation of the Ranger mine, including the development of closure criteria. Committee discusses matters relevant to the regulatory functions of the NT Government and the supervisory and assessment functions of the Supervising Scientist, as well as operational requirements of ERA and the views of the Mirarr and other affected Aboriginal people.	DLPE - NT Department of Lands, Planning and Environment (Chair), Commonwealth Departments of Climate Change, Energy, the Environment and Water (DCCEEW), Supervising Scientific Branch (SSB), DISR - Commonwealth Department of Industry, Science and Resources (observer), GAC, NLC and ERA,
Ranger Closure Consultative Forum	2-monthly	To provide ongoing updates of closure activities; information on upcoming approvals; and to receive feedback from stakeholders on studies, applications and the close-out progress of KKNs.	Commonwealth DISR, SSB, DLPE, NLC/GAC.
Alligator Rivers Region Technical Committee (ARRTC)	Bi-annually	Group established in 1993 and restructured in 2001 in response to a recommendation by an Independent Science Panel established by the World Heritage Committee. Purpose of the committee is to review the quality and adequacy of scientific research conducted by the Supervising Scientist, ERA and others and to make recommendations to the Minister on the nature and extent of research necessary to protect and restore the environment in the Alligator Rivers Region.	Members include an independent Chairperson, the Supervising Scientist, independent scientific members, member representing the NLC and a member representing environmental non-government organisations. http://www.environment.gov.au/science/supervising-scientist/communication/committees/arrtc
Alligator Rivers Region Advisory Committee (ARRAC) meetings	Bi-annually	Facilitates communication between government, industry and community stakeholders on environmental issues associated with uranium mining in the Alligator Rivers Region.	Membership as established under the <i>Environment Protection (Alligator Rivers Regions) Act 1978</i> : http://www.environment.gov.au/science/supervising-scientist/communication/committees/arrac .
Relationship Committee meetings	Quarterly	To ensure effective information sharing and review processes between ERA and the Mirarr Traditional Owners and their representatives.	Meetings have paused: last meeting of this group occurred in September 2023.
Jabiru MOU Oversight Forum	Quarterly	Group is responsible for making decisions and coordinating projects and activities listed within the four priority work streams – infrastructure, economic development, housing and services and township leasing.	GACJT, GAC, Department of the Chief Minister and Cabinet (DCMC), Parks Australia, ERA.

Engagement forum	Frequency	Purpose	Participants
Jabiru Program Steering Committee (JPSC)	Monthly	To support initiatives agreed under the Future of Jabiru,	GAC JT, GAC, NLC, Jabiru Property Services, DCMC, Department of Infrastructure, Planning and Logistics, Department of Climate Change, Energy, the Environment and Water, ERA, West Arnhem Regional Council, Jabiru Police, and Parks Australia.

Source: ERA (2024) – Chapter 3 of Ranger Mine Closure Plan, Revision number 1.23.2, October 2024.

3.4 Mine closure

This section describes what has been, and is currently being, undertaken in terms of closure financial estimation provisioning related to the RPA.

On 3 February 2025, members from SRK and LEA attended a site visit to the RPA. This inspection focused on the rehabilitation efforts currently underway at Pit 3, which included observations of the dry capping process that commenced in December 2024. The power stations and brine concentrator were also inspected, as well as observational ground-truthing visits to the Ranger Water Dam (RWD), rehabilitated Pit 1, and a drive-by tour of the plant area. The visit underscored the complexities of the rehabilitation effort, particularly regarding water management and addressing the concerns of Traditional Owners.

According to ERA's 2024 MCP, the primary goal of closure at the Ranger mine is to rehabilitate the disturbed areas of the RPA, establishing an environment similar to adjacent areas of Kakadu National Park, while providing access to the area for Traditional Owners in the future. The total area of disturbance in the RPA to be rehabilitated is approximately 1,060 ha. The closure domains for Ranger are outlined in the supplied Figure 3.3. A closure implementation plan has been compiled that aligns with rehabilitation obligations and activities as outlined in the Ranger MCP 2024 (MCP 2024). A summary of the closure activities to be completed has been reviewed against the current cost estimate and outlined in Appendix A.

The current preliminary estimate in discounted real terms for the remaining rehabilitation work, as at 31 December 2024, is A\$2,422 M, as documented in the ERA Audit and Risk Committee (ARC) memorandum dated 10 February 2025. The total completed spend to date on the project is A\$909 M.

Figure 3.3: Ranger mine closure domain map



Source: ERA (2024) – 2024 Mine Closure Plan Report

3.4.1 Information reviewed

In undertaking its review, SRK received information via a virtual data room, and engaged with available RPA personnel, to better understand the approach adopted with respect to closure planning, the forecasting of the Company’s liability estimates, and how the Company is tracking with regards to current rehabilitation expenditure at the Ranger operation.

For the purpose of its review, SRK reviewed the following data.

Provision modelling:

- ARC Memo Dec24 Rehab Provision Prelim Estimate.pdf
- Item 1.3 ERA_Rehabilitation_Provision_Dec2024_v090124
- ERA_Rehabilitation_Provision_June2024_v260724.xls
- Item 30 - Rehabilitation Provision Memo (ARC Memorandum Rehab Provision June 2024)

Basis of cost estimate reports:

- 2023 Feasibility Reforecast - Basis of Estimate Tranche 1a.pdf

Mine Closure Plans:

- 2024-RMCP-Main-Document
- 2023 RMCP

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- 2022 RMCP
- Ranger 2023 Closure Implementation Plan

Contingency Analysis:

- Item 2a - ERA - Contingency Analysis
- Item 2b - integrated project management team (IPMT) - Contingency Analysis
- Item 2c - Green Risk Excl T1A Contingency Analysis
- Item 2d - Red Risk T1A Contingency Analysis

Ranger Rehabilitation Project:

- Item 10 - Management Services Agreement- Executed - 3 April 2024
- Item 31 - Ranger Rehab Committee Oct24
- Item 28. Preliminary resource plan May 2024.

3.4.2 Closure implementation

The RPA closure domains identify areas of the site requiring similar rehabilitation needs, the activities required to complete closure and rehabilitation often extend beyond a single closure domain. A closure implementation plan was developed in 2023 to address the total required closure activities to meet the legal obligations of the site and ultimately achieve successful closure and relinquishment. These activities cross domains and encompasses; i) capping and backfilling the mined-out pits; ii) water management; iii) demolition and disposal of on-site infrastructure and contaminated material, iv) the deconstruction of the RWD; and v) the creation of the final landform, as well as other tasks that do not fit neatly into a specific domain. The closure MCP and closure provision have been aligned to the closure implementation plan.

In September 2023, ERA decided to transition from a single project delivery approach to a program management approach, with the works being divided into separate tranches, namely:

- Tranche 1A (2024-2027): Phase 1 demolition, pit 3 initial and secondary capping and further studies on tranche 1B
- Tranche 1B (2025-2027): Implementation of process water treatment and further studies on tranche 2
- Tranche 2 (2027-2035): Bulk Material Movements; RWD deconstruction, final landform, site revegetation and further studies on tranche 3
- Tranche 3 (timing TBC): Monitoring and maintenance.

The closure implementation plan was used to develop the Tranche 1A schedule and capital cost estimate to an overall class 3 level estimate with -10 to +15% accuracy. Future tranches are provisioned based on the 31 December 2024 preferred plan, which in turn is based on the current MCP taking into account the technical closure options available to meet ERA's obligations. The provision represents the current management best estimate of costs at this time. However, future activities remain subject to a number of ongoing studies which may influence future base plans for implementation of the rehabilitation.

3.4.3 Status of rehabilitation

An 8-hectare Trial Landform (TLF) was constructed in 2008/2009 near the northwest corner of the RWD to gather information on revegetating waste rock. The TLF facilitated the testing of different strategies for landform design and ecosystem establishment. This included trials with various types of surface substrates, differing depths of mixed materials over the waste rock layer, different planting methods, and several irrigation approaches (Daws and Poole, 2010). The TLF continues to be monitored and to provide valuable information to guide the site's Ecosystem Establishment Strategy.

Pit 1 represented the first opportunity to undertake a large-scale revegetation initiative, yielding valuable insights for improving processes related to seed treatment, propagation, planting, and plant survival. The approximately 40-ha top surface of Pit 1 was planted over ten months between 2021 and 2022, incorporating research trials and progressive revegetation as part of the Ecosystem Establishment Strategy.

Overall feedback on rehabilitation activities undertaken to date and at the time of writing of the 2024 MCP were reported as being positive, with the revegetation strategy being undertaken to incorporate a variety of functional understorey species. This includes relatively non-aggressive, low biomass grasses, herbaceous species, and shrubs for the initial establishment phase.

3.4.4 Cost estimation review

A review of the current available provision model dated December 2024 was undertaken by SRK to determine completeness and alignment to the Ranger MCP and closure implementation plan.

ERA's provision has adopted the program management approach for executing the remaining rehabilitation activities. This approach intends to provide greater certainty and value for ERA shareholders and stakeholders as it supports optimisation, along with risk and uncertainty to be addressed before funding is requested for activities envisaged to occur post-2027, while enabling critical path activities to be progressed.

Tranche 1A of this program management scope encompasses a series of well-defined activities that have been scheduled until the end of 2027. In August 2024, ERA announced its intention to raise approximately A\$880 M to fund its planned Ranger Project Area rehabilitation expenditure to approximately Q3 of 2027. ERA has indicated in its Appendix 4E of the ASX Preliminary final report (as announced to the ASX on 26 February 2025), that both the activities and studies extending beyond 2027, along with their associated estimates, remain highly uncertain. As such, any estimates of expenditure beyond 2027 remain subject to further studies.

Details on assumptions used within the provision model were referenced in the 2023 Feasibility Reforecast Study Basis of estimate (2023 BOE) report. The provision included an estimate for all closure activities with a sound methodology for build of costs outlined in the 2023 BOE. Risk based range review and contingency analysis was undertaken to understand the uncertainty in the preferred case estimate and closure activities.

Additional commentary on the findings of the review are as follows.

Unit rates

SRK reviewed a sample of unit rates outlined within the 2023 BOE. These were spot-checked against a third-party Northern Territory (NT) rates database. NT rates are, on average, typically higher compared with other regions in Australia. In SRK's opinion, the rates assessed for the RPA are within the expected range for contractors, with some rates being lower than expected, while others are higher when compared to SRK's internal third-party unit cost rate database. Notably, SRK observes that contractor rates will typically vary depending on, but not limited to, the prevailing tender processes, the general availability of plant and resources, as well as perceived interest in the work to be undertaken.

Pre-closure water management and monitoring

In the December 2024 provision, the listed cost line item for water management and pre-closure monitoring has been excluded from the provision with a note stating, '*it appears to be double accounting for in item SCA16 Water Management Monitoring*'. The pre-closure monitoring refers to any site monitoring being undertaken during the active closure period prior to establishment of the final landform, as well as the transition to the monitoring and maintenance period (2025–35). The pre-closure monitoring included surface and groundwater, which would be provisioned for in the water management monitoring scope; however, it also included radiation, Aboriginal and heritage monitoring, and annual environmental data management licensing. The non-water pre-closure monitoring scope does not appear to have been captured elsewhere in the provision.

In applying the alternate assumption set noted above, SRK considers the cost for pre-closure monitoring to be underestimated against the assumptions underpinning the current provision. SRK recommends further review and provisioning of costs for the required non-water pre-closure monitoring programs.

Monitoring and maintenance period

The MCP outlines that the monitoring program will be undertaken until results show that they have met, or are on the trajectory to meet, closure criteria. The nominal timeframe to achieve this is currently 25 years following the completion of the final landform. The current schedule has the final landform being completed in September 2035, which means the monitoring and maintenance period will extend to September 2060.

The 2023 BOE lists numerous monitoring programs throughout the post-closure period. The scope and cost estimate for this activity is understood to be coordinated by Umwelt Environmental & Social Consultants and developed considering discussions and reviews with ERA personnel.

The post-closure monitoring and maintenance period includes provision spend of A\$299,083 per month through December 2050 decreasing to A\$118,268 per month (real terms undiscounted) from January 2050 through December 2060. Activities provisioned for are listed below:

- post-closure monitoring (flora, fauna radiation, etc.) included through December 2050
- water management monitoring included through December 2050

- post-closure fire and weed management included through December 2050
- employees with eight residential staff working exclusively on post-closure tasks included through December 2060
- rental housing for residential employees included through December 2060
- IT ERA included through December 2060
- Rio Tinto recharges included through December 2060.

Post-closure monitoring costs (flora, fauna, water, radiation, etc.) have been scheduled until December 2050 at a rate of A\$61,705 per month (real terms undiscounted). There is potential for the provision to be underestimated for post-closure monitoring, if it is deemed required, until final close out certification, estimated date December 2060.

Rehabilitation maintenance post-closure, both for revegetation and erosion, has not been included in the provision. The FS BOE itemises post-closure maintenance; however, it states these aspects have been excluded from the scope of works, and therefore, no items are presented in the provision model. Future studies to develop maintenance plans have been included in the owner's costs and these include:

- development of an ecosystem monitoring and maintenance plan
- water, erosion and sediment control plan.

It is expected that during a 25-year monitoring and maintenance period, some degree of earthworks maintenance will need to be undertaken until the final landform has stabilised. Activities to be reviewed in a maintenance program include, but are not limited to:

- gully and rill rectification works
- sediment control upkeep
- reseeding programs
- fire and weed control.

Fire and weed control have been included for the post-closure period at a rate of A\$36,018 per month (real terms, undiscounted), continuing until December 2050. ERA's preliminary assessment of the post-closure period included the assumption that fire and weed management will be necessary for approximately 15 years after closure. This assumes that costs will decrease in comparison to the operational phase costs. In the base case scenario, particularly where vegetation is established early, ERA anticipates that these costs will gradually decline, although some uncertainty remains. The ultimate goal is to establish an environment comparable to the surrounding Kakadu National Park, accepting that such an environment also will manage both weeds and fire.

Continuous fire weed management will support vegetation establishment until it reaches and acceptable maturity level. As the vegetation establishes and becomes self-sustaining, the weed and fire control can be progressively halted if the monitoring data support such a decision. SRK recommends including costs for fire and weed management until final close out certification is achieved at the end of the 25-year monitoring period.

In applying the alternate assumption set noted above, SRK considers that the cost for post-closure maintenance is potentially underestimated against the prevailing assumptions within the current provision. However, the degree of potential underfunding cannot be quantified at present.

Property holding costs

The December 2024 provision included provision for site (property) holding costs through the active closure period; this included an adjustment to the original schedule to account for the delays caused by Pit 3 procurement. No provision has been included post 2035 for any rent or fees, considering that the monitoring and maintenance period extends to 2060. The November 2024 approvals register lists the date for final close-out certification to be submitted in 2060.

The December 2024 provision includes:

- EYP01 Rent – based on latest invoicing (provided in 2023 BOE)
- EYP01 Fees and Insurances – which includes NT Built Levy: NT government scheme that is statute based and funded through a ministerially determined levy on eligible NT construction projects of at least A\$1 M in value.

The NT government manages the mining leases and permits for the state. NT mining lease annual rents and administration fees are required to be paid annually while a Mineral Title remains valid. Mineral Authorities attract the same fees and conditions as the corresponding mineral lease.

The RPA Section 41 Authority lists:

ERA shall continue to comply with and observe its obligations under this Authority and ERA's rights under this Section 41 Authority to access, occupy or use the Ranger Project Area shall be limited to such purposes and this Authority shall, subject to clause 6 (Rehabilitation), continue until the earlier of:

(a) the date of Final Close-Out;

(b) end date of the Authority (currently 8 January 2026 until extension approved)

(c) the date this Authority is terminated or revoked.

The Atomic Energy Amendment (Mine Rehabilitation and Closure) bill, passed in November 2022, enables the minister to grant a new rehabilitation authority or vary the existing authority to extend validity dates for the purpose of authorising rehabilitation, remediation and monitoring operations to be completed, ensuring that the regulatory framework can be extended until the rehabilitation of the site meets regulatory conditions and can achieve closure out certification.

ERA's position regarding property holding costs is based on the revised Section 44 agreement, which stipulates that rental payments will cease when the agreement ends in January 2026 (refer Section 5.1). Under the Section 41 agreement, post-closure monitoring (after operations cease) is required under Environmental Requirement 13.3. Accordingly, based on the current agreements and ERA's assumption that rehabilitation would be completed by January 2026, rental payments were not anticipated during the post-closure monitoring phase. ERA has applied the same logic and assumptions in its December 2024 provision with the extension of rehabilitation activities until 2035, with property payments expected to occur until this date with no further payments due during the post-closure monitoring period.

It is SRK's experience that companies continue to pay site holding costs until they have successfully rehabilitated the site and achieved close out certification as approved by the specific regulatory bodies. The Atomic Energy Amendment bill 2022 was passed to allow for additional timeframe to complete works and undertake required monitoring. In this case, the estimated time until final close out certification is currently at 25 years post-finalisation of the final landform, which is December 2060. Although the extension to the current Authorisation end date of 8 January 2026 has yet to be approved, it is SRK's recommendation that property holding costs should be held in provision for the entire monitoring and maintenance period to align with expected obligations of ERA to complete the rehabilitation project. SRK considers there is a risk that the current site holding costs are undervalued in the current provisioning due to not fully accounting for the monitoring and maintenance period.

Given this uncertainty regarding the timing of the extinguishment of this liability, there is a potential risk that site holding costs may be undervalued in the current provisioning given these costs are not fully accounted for during the monitoring and maintenance period. The current rate for property holding costs have been included in the provision at A\$100,777 per month (real terms undiscounted). The range of property holding costs are outlined for the following alternative scenarios, expressed as the difference in total costs from the current provision in discounted real terms for each scenario:

- current authorisation expiry in January 2026 (no extension): A\$10.6 M decrease (or A\$12.2 M in undiscounted real terms)
- completion of rehabilitation works (operations) in August 2035 (current provision): no change
- authorisation extension application date is December 2052: A\$13.2 M increase (or A\$20.9 M in undiscounted real terms)
- close out certification expected in December 2060: A\$18.3 M increase (or A\$32.2 M in undiscounted real terms).

Due to the uncertainty regarding the Authority extension and underlying obligations, SRK recommends formal independent legal opinion should be sought as to the ongoing obligations regarding property holding payments throughout the monitoring and maintenance period and this advice be considered in relation to future provision best estimates.

Project contingency

Mining cost estimation contingency refers to an additional amount of funds added to the estimated mining cost to account for unforeseen risks and uncertainties that may affect the project's cost. The amount of contingency added to the cost estimate will depend on the level of risk and uncertainty associated with the project.

ERA's overall project estimate for the Ranger closure has been classified as being at a feasibility level study, with a class 3 provision estimate, implying a -10% to +15% level of accuracy. Under prevailing industry guidelines developed and published by AusIMM (Figure 3.4), an expected project contingency value for a class 3 estimate would be within 10–15%.

ERA's estimating policy contingency is derived in relation to previous risk/opportunity assessment related to the scope under review and have been calculated via either a probabilistic or deterministic approach. The approach is based on a predetermined scope and excludes

contingency for any changes or new scope items. Instead, it serves as an allowance for potential variations within the existing scope based on risk and opportunity and inherent uncertainty.

ERA's current contingency provision, which assesses both price and schedule contingencies, is set at A\$257.2 M in discounted nominal terms. SRK understands that ERA's contingency has been assessed based on the various unknown elements within the project scope, aiming to ensure that the estimate reflects a central case scenario.

While SRK understands that allowances have been incorporated for individual activities by ERA, these being based on risk and probability calculations within the existing provisions. An individual activity-level review of contingency has been conducted referring to the AusIMM guidelines, focusing on price and schedule contingencies. Industry guidelines contingency ranges also review risk related to current project engineering definition, which can potentially result in scope change from the identified base case. The identified risks and findings are detailed below.

It is important to acknowledge that the stated contingency amount is not a fixed number and may change over the course of the project duration as various uncertainties are resolved. As the project progresses, and more information becomes available, the contingency amount should be adjusted align with the evolving risk profile.

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Figure 3.4: General Study Classification Guide – AusIMM

Terminology used in this handbook		Scoping study – Phase 1	Prefeasibility study – Phase 2	Feasibility study – Phase 3
Front end loading		FEL 1	FEL 2	FEL 3
Different titles that may be used to describe this level of study	Conceptual	Concept	Preliminary feasibility	Final feasibility
	Opportunity assessment	Order of magnitude (OOM)		Basic engineering
		Identification phase	Selection phase	Definition phase
	Screening	Scoping ^a		'Bankable' feasibility
	Scoping (see footnote)			Definitive feasibility
		Capacity factor	Equipment factor	Forced detail
		Preliminary evaluation	Intermediate economic study	
Estimate type (AACE)		Class 5	Class 4	Class 3
Expected accuracy range of capital cost	±35% to ±100% Typically ±50%	±30% to ±35%	±20% to ±25%	±10% to ±15%
Expected estimate contingency range	30% to 75%	20% to 35%	15% to 25%	10% to 15%
Level of definition (% of complete engineering (see Table 4.5))	Minimal, generally based on other operations, or in-house 'database'	1 - 2% Basic general layouts	10 - 15% Preliminary take-offs	15 - 25% Detailed drawings and take-offs
Typical estimating methodologies (but refer Table 4.5 for detail by line item)	Capacity factored Parametric models, judgement or analogy Stochastic estimating methods, including cost-capacity curves, and various factors	Equipment factored or parametric models. Some 'first principles' estimating related to early scope definition	Semi-detailed unit costs, and more deterministic estimating methods Preliminary MTOs (Some) budget pricing	More detailed unit costs and MTOs Budget prices and vendor quotes Higher degree of deterministic estimating methods Line Items, and forced detail where definition is lacking

Notes: a. Although the term 'scoping study' can sometimes be used synonymously with a study at a level before FEL1, throughout the rest of this handbook, it is used to indicate a study generally before that of a prefeasibility study (PFS). FEL = front end loading (Independent Project Analysis Institute (IPA)). MTO = material take-off.

Sources: AusIMM Monograph 27

Price contingency

SRK notes that the 2023 FS reforecasting models provided by ERA have been iteratively developed through multiple rounds of review, as well as contingency assessment workshops with Monte Carlo methods applied, to determine the current ranges of price contingency for the Ranger Project. The currently stated P_{mean} calculated contingency was determined at 7.88% for the IPMT scopes and at 9% for ERA's scopes of works associated with the Tranche 1A package. In addition, the 2023 FS reforecast recommended that ERA carry the difference (delta) between P_{80} and P_{mean} contingency value within a management reserve, at a minimum.

Reviewing price contingencies applied within the December 2024 provision model, SRK found that the following projects have been calculated at higher than the P_{mean} contingency:

- Brine Injection capital at 10%
- Pit 3 Decant towers, geotextile, amphirool machines⁹ at 10%
- Pit 3 dry capping at 10%
- Catchment conversion (mechanical, piping and civil works) at 12.5%
- Borehole remediation at 10%
- Brine Concentrator Operations O&M at 15%
- Pond water treatment 1 at 15%
- Water management and monitoring at 15%.

Technical studies are still being progressed during Tranche 1A to confirm a single preferred and optimised option for work in future tranches, including Bulk Material Movement, catchment conversion and process water treatment. The current level of understanding of these activities is at pre-feasibility stage and as such the inclusion of a higher contingency may offset any future risk related to project scope changes. The higher contingencies applied to the above activities lie at the top end of the FS expected range reflecting ERA's assessment of the increased risk definition associated with these activities compared with those outlined in the total FS study. The total Bulk Material Movement for both Pit 3 backfill and final landform creation was not considered by ERA for a higher contingency.

The following percentages are lower than P_{mean} calculated contingency

- Employee costs at 5%
- Owners Costs at 5%
- Site works at 5%
- RWD groundwater plume remediation at 5% (included with owners' costs).

The employee, owners' costs and site works line items rely on labour-based services. The 5% contingency for these items aligns with the PricewaterhouseCoopers review of the December 2024 rehabilitation provision recommendations, while remaining contingency rates were found to be reasonable by SRK with no change recommended.

Project scope uncertainty

SRK has reviewed ERA's activity level contingencies against the AusIMM industry guidelines for expected contingency levels, based on current engineering scope definition maturity for each activity.

The RWD groundwater plume remediation has been included with a contingency of 5%. SRK understands that there is currently no engineering definition around groundwater treatment for the

⁹ Amphirool machines: screw propelled vehicles, able to traverse soft sites/surfaces while aiding the tailings drying process by producing a crust as the overturn tailings surfaces

RWD plume. As such, it is considered to be at an OoM level of understanding. As shown in Figure 3.4, AusIMM's Cost Estimation Handbook (Monograph 27) outlines that the expected contingency for an OoM level would be within 20–35%.

The 2023 BOE did not include a scope basis for RWD groundwater plume remediation, resulting in the underlying assumptions behind the determination of these costs unclear. This line item was labelled as a late edition within the December 2024 provision. However, SRK was unable to trace the origin of this figure in other documents provided. In SRK's opinion, this line item should carry a higher contingency until further studies are completed and clearer definitions are developed for the remediation activities. This increased contingency would help mitigate the risks associated with the maturing estimate process, which may identify changes to the project scope related to these works. The current provision includes A\$22.9 M in real terms and undiscounted over a 7-year period of cost related to the RWD ground water remediation scope. SRK recommends increasing the contingency related to this cost to 25% to align with a mid-range for OoM definition (Figure 3.4) for this activity.

Bulk material movement (BMM) for the final landform has been included by ERA with a contingency of 7.88%. Current engineering designs for this landform remain under development, requiring further iterations of erosion modelling to determine the final design that meets the landform closure criteria, subject to regulator approval.

The 2024 MCP provides a subjective progress status for the landform theme, where <100% implies that future work is occurring, planned and/or required. The currently estimated status is:

- 70% relevant studies completed
- 80% preventative controls effective
- 80% monitoring program developed and operational
- 70% corrective actions effective.

BMM forms part of achieving the final landform (FLF) topography. The FLF version 7, issued by ERA, serves as the basis of the FS and is subject to approval by ERA's stakeholders including the relevant Government Agency.

- FLF relevant studies completed is subjectively estimated at 70% as stated in the 2024 MCP. Studies to be completed include:
 - Erosion, sediment and water control plan
 - Final FLF design optimisation
 - Tailings consolidation modelling.
- The status of Preventative Controls effectiveness is subjectively estimated at 80% complete in the 2024 MCP. This includes the following areas listed as marginal or weak:
 - Erosion control measures including preparation of final landform surface
 - Sediment control measures including sediment basins (currently at preliminary design)
 - Drainage control structures including sinuous armoured drainage channels
 - Legal instruments.

- The Ranger Project Team continues to review and optimise final landform designs (FLv7), incorporating both permanent and temporary erosion mitigation strategies to enhance landform stability and revegetation success. Once the optimisations indicate little or no improvement in modelled outcomes, the final landform design will be provided to the Commonwealth's OSS for import to its CAESAR-Lisflood model. The OSS will assess the design's long-term stability as part of the Final Landform application assessment (2024 MCP).
- The most recent assessment undertaken by OSS on FLv6.2 (Supervising Scientist, 2020a) indicates that the landform is unlikely to achieve the background denudation rate of 0.075 mm/a over a 10,000-year period.
- BMM and RWD demolition do not form part of Tranche 1A activities, however ERA has undertaken a pricing review for these activities with the quantity of material movement not having varied substantially during the reforecasting reviews.

As the engineering status of the final landform remains to be confirmed with further options and optimisation of conceptual level designs to be completed, SRK considers that a higher contingency should be in place for this activity to mitigate the risk of the maturing estimate process identifying project scope changes related to these works. The current provision is held at A\$292.7 M (real terms undiscounted). This activity will be undertaken between December 2027 and November 2033. SRK recommends reviewing the contingency to account for the uncertainty in scope that aligns to the PFS definition (Figure 3.4) for this activity. The potential movement in contingency provision would be in the order of A\$6.2 M if a 10% contingency is applied and A\$21 M if a 15% contingency is applied.

For the aforementioned reasons, a number of closure activities have a lower itemised contingency than would be expected relative to their level of design maturity. In light of these factors, SRK considers there is a risk that the provision will be insufficient to complete the closure works should the technical studies and the related estimate process identify project scope changes. In such a scenario the overall contingency currently held may be inadequate. Conversely, it is noted that under the Management Services Agreement (MSA) entered into in April 2024, there is an objective to reduce costs, and these cost savings, if achieved, remain an opportunity to mitigate total project costs as budgets and forecasts are further assessed, as discussed further below.

Schedule contingency

In addition to pricing and quantity range and contingency workshops, SRK also assessed the proposed timing for the rehabilitation projects as per the prevailing schedule. Schedule-ranging workshops were conducted during the 2023 FS reforecasting and Tranche 1A provision development. Modelled ranges in the schedule indicated a required contingency duration of eight months. This schedule estimate is above what is traditionally deemed suitable (three months) for schedule metrics in construction projects. The primary driver for the higher schedule contingency was the approvals for Pit 3 capping.

The 8 months schedule contingency had been split into two portions:

- 3 months for typical schedule contingency metrics equating to A\$44.8 M (undiscounted real terms)
- 5 months contingency specifically relating to the approval of Pit 3 capping of A\$42 M (undiscounted real terms).

In the December 2024 provisions, as outlined in the ARC memorandum, the A\$42 M specific contingency previously held for delays in approvals for Pit 3 capping has been removed. SRK understands that this contingency was removed as the approvals were obtained prior to the commencement of the capping execution and thus no longer represent a critical path for the project and therefore the conditions that had supported its original inclusion were no longer present.

SRK understands the original schedule defined for Tranche 1A has experienced delays. This has primarily been due to the procurement process for the Pit 3 capping work program (which experienced a 3-month delay). This delay had a flow-on effect on future work programs, as outlined in Table 3.3. The ARC memorandum dated 10 February 2025 related to the December 2024 rehabilitation provision acknowledges these delays and adjustments to the schedule have been assessed in the December 2024 provision and included in the total project costs. There was an increase in costs of A\$20 M discounted real terms due to the pit remaining open for longer, resulting in higher rainfall water volumes requiring treatment and additional site holding costs until the final landform is scheduled to be completed.

There is a risk that the schedule contingency currently held, 3 months determined for Tranche 1A earthworks (1 month per year until end 2027), will not be adequate for the full rehabilitation project.

Further assessment of schedule contingency should be undertaken. Until this work is completed, SRK recommends reviewing the overall project schedule contingency addressing the earthworks schedule. Reassessed earthworks schedule contingency for Tranche 1B and 2 should be held until works within those tranches are completed.

Table 3.3: Schedule delays

BMM Schedule	CY23		CY24		Delay (Months)
	Start	End	Start	End	
Pit 3 Capping (Initial & Secondary) ¹	May-24	Apr-27	Jan-25	Oct-27	6
Pit 3 BMM	Feb-27	Mar-29	Nov-27	Dec-29	9
Other Site BMM	Apr-29	Jun-31	Jan-30	Nov-32	17
RWD Deconstruction	Jul-27	Jul-28	Sep-29	Sep-30	26
Pit 3 + Site - 80% FLF	Jul-31	Jun-32	Dec-32	Nov-33	17
RP2 + FLF	Apr-34	Aug-34	Apr-35	Aug-35	12
BC Decom Primary/Sec	Apr-34	Aug-35	Apr-35	Aug-36	12
FLF Complete	Sep-34		Sep-35		12

1. Pit 3 capping dates are per the Tranche 1A schedule issued on 24 November 2024. The remaining items, which fall outside the scope of Tranche 1A, are scheduled based on modelled projections.

Source: ERA Audit and risk committee memorandum – Rehabilitation Provision. Dated 10 February 2025

3.4.5 Closure risks and opportunities

Approvals

The RPA requires several additional regulatory approvals to complete the planned rehabilitation works. Major regulatory approvals can take from 12 to 24 months, whilst minor approvals can take up to 9 months. However, it is important to recognise that the actual timeframes can vary

significantly due to unforeseen complexities or challenges that may arise during the approval process. As such, the project timelines quoted by ERA (and outlined herewith) are estimates and may extend beyond these periods if new challenges or regulatory requirements emerge.

Current major regulatory approvals and submission dates are outlined in Table 3.4. Potential delays in approvals will directly impact the project schedule. The June 2024 provision has assumed that all approvals (both minor and major) will be available, as required, by the implementation schedule. As such, the current provision does not include a schedule contingency for any outstanding approvals.

Table 3.4: Required regulatory approvals

Description	Type	Submission Date
Pit 3 secondary capping application	Major	Q2 2025 ¹
Plant Demolition – Phase 1	Major	Q2 2025
BMM	Major	Q3 2027
RWD Deconstruction (included in Final Landform application)	Major	
Final Landform	Major	Q4 2026

Source: ERA Approvals Register November 2024

Notes:

¹ In August 2024, the Commonwealth and Northern Territory Ministers granted approval for the Pit 3 Capping application (initial and secondary), subject to conditions. One condition requires ERA to obtain Supervising Scientist (OSS) support for its material movement plan. Support for the initial capping material movement was received from the OSS in November 2024. Discussions regarding OSS approval for the secondary capping are currently underway, with documentation provided in March 2025.

Contingency review during Tranche 1A determined that a 5-month schedule contingency should be held for any delays with Pit 3 initial capping approvals. Currently, there remains major approvals to be obtained for bulk material movement, RWD deconstruction and final landform (Table 3.4). Currently, no schedule contingency is being held for these activities that can be observed; however, relative to the Pit 3 approval item, these activities remain far less proximate to critical path. ERA has assumed that due to this, the risk of schedule delay that they represent is not extraordinary.

Further assessment of schedule contingency should be undertaken for these major approvals. Until this work is completed, SRK recommends reviewing the overall project schedule contingency addressing approvals risk.

Water treatment

SRK recognises that post-closure water treatment for potential groundwater contamination plume remediation has not been factored into the closure provision, which could impact the closure liability if required. ERA, with a specific focus included in the MSA in drawing upon Rio Tinto's broad experience, is studying long-term water management with a focus on groundwater contamination at RWD, Pit 1, and Pit 3. This involves the use of interception trenches and the evaluation of pump and active treatment methods. The timeline for these studies is yet to be established. Although the Traditional Owners reportedly advocate for active water treatment in perpetuity; this option is not currently being considered. Additionally, in the upcoming decommissioning of the RWD, clay extracted from the walls could be utilised to form a clay cap on

the RWD floor. This would in theory help minimise water ingress into the existing plume beneath the RWD and decrease the upward movement of water into the waste rock. Given the status of studies, it is not possible to quantify the potential associated costs for water treatment related to the groundwater contamination plume; however, SRK understands that the project team is working towards gaining a better understanding and potential remediation options are still being assessed.

Closure criteria and ecosystem re-establishment

Ranger Mine Pit 3 Capping, Waste Disposal and Bulk Material Movement Application has been conditionally approved by NT minister subject to 5 conditions being met to address critical information requirements. Table 3.5 below references the number of closure criteria that appear in the MCP and their relevant approval status.

Table 3.5: Closure criteria status

Theme	MCP Table	Total No. (Parameter/Goal)	No. Approved	No. in Draft
Landform	6-2 and 6-3	5	5	0
Water and Sediment	7-Feb	4	4	0
	7-Mar	3	0	3
Soils	8-Feb	2	2	0
Ecosystems	9-Feb	23	23	0
Radiation	10-2	4	4	0
Cultural	11-1	13	13	0

Source: Email 19 February 2025, Michael Ryan Senior Projects Advisor Umwelt

In section 9 of the 2024 MCP, the ecosystem efforts focus on establishing and maintaining environments that support plants and animal communities in both mined and less disturbed areas. While stakeholders are reportedly agreed on general closure criteria, detailed benchmarks are still being refined through ongoing stakeholder reviews, and some revisions will require formal approval. A strong foundation of research and trials at RPA informs the intended approach, but further work is needed to analyse data and manage emerging risks periodically. Some preventative measures are deemed effective, yet uncertainties remain, prompting further studies. A comprehensive monitoring program is being developed from previous long-term revegetation trials, while corrective actions are understood, but not yet executed on constructed landforms, with plans to further address these in the future.

Uncertainties in defining and agreeing upon detailed closure criteria and measurements, which could hinder progress evaluation is a risk. Although a significant knowledge base exists, gaps in understanding could affect the success of rehabilitation strategies. Delays in implementing corrective actions may extend recovery times and complicate the closure process. Addressing these risks is vital for successful closure and rehabilitation.

Management Services Agreement – Rio Tinto

In April 2024, the ERA board entered into a Management Services Agreement (MSA) with Rio Tinto to manage the remainder of the Rehabilitation implementation. Under the MSA, there was an

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objective to reduce Tranche 1A costs. These cost savings remain an opportunity to reduce total project costs as budgets and forecasts are currently being assessed.

Progressive relinquishment

As outlined in the MCP, opportunities have been identified for relinquishing selected parts of the RPA ahead of the mine's entire disturbed footprint. This includes an area of approximately 3,000 ha to the north of Magela Creek, that was subject to minimal exploration disturbance.

Progressive relinquishment of areas of prior disturbance within the RPA will allow for the establishment of accepted monitoring data to reach closure criteria and ecosystem establishment. This process will act as a trial and assist in further refinement of the implementation plan for rehabilitation on the final landform and inform trajectory targets and corrective actions.

Social-economic transitioning

There was no requirement to consider social-economic transitioning in the assessment undertaken by SRK, this assessment focuses on biophysical closure aspects. However, good closure practice is to identify and implement socio-economic transitioning plans sufficiently ahead of actual closure to allow time for the actions to mature and reach a level of sustainability. The socio-economic transitioning costs could be, and should be, sufficiently developed prior to actual closure.

Costs have been included in the current provision under the general studies and approvals line item to assess the community and social performance for the site. This item includes scope for a social impact assessment, development of economic initiatives, stakeholder engagement and legal commitments. Based on the provided provision models, SRK is unable to determine the breakdown of the provision that has been made for socio-economic activities.

The current workforce redundancy obligations are not included in the provision. ERA has indicated that these costs are not recognised in provision estimates until a direct plan has been formulated and communicated in accordance with the International Financial Reporting Standards accounting standards. Internal reporting on TPC includes the addition of estimated workforce redundancy costs.

3.4.6 Conclusion

ERA has conducted the closure liability assessments using a commercial costing approach, rather than a generic liability estimate calculator. SRK considers that commercial costing is the more accurate method and therefore considers that ERA has made the best attempt to understand its liability to the full extent currently possible in the absence of further studies.

In SRK's opinion, the approach to closure planning and liability estimation, as implemented at the RPA and its operations, aligns with good industry practice. The RPA is inherently a complex project, with future activities beyond 2027 requiring additional studies and ongoing approvals. Consequently, it is likely that the current provision will need to be revised once these studies are complete or additional approvals are granted. A particular area of uncertainty to SRK involves the formal regulatory approval of certain closure criteria and the mechanisms through which relinquishment can be approved and signed off by both Territory and Commonwealth regulators. This uncertainty, while not uncommon in the industry, will necessitate careful management to

ensure that adequate provisions maintained throughout the duration of the project up to and including potential relinquishment.

SRK considers the schedule outlined for the RPA to be aligned with the data currently available. The schedule aligns well with the details of Tranche 1A up until the end of 2027. However, the risks and uncertainties associated with activities and timelines beyond Tranche 1A should continually be assessed. The provisions will need to be reassessed to improve accuracy in the ongoing trend of the provision. ERA is currently undertaking further studies to better understand and close existing knowledge gaps regarding future tranche activities, with the outcomes of these studies likely to further refine the schedule and provisions going forward.

Based on SRK's experience, there is a potential for underestimation of the current provisions due to activities not extending throughout the entire post-closure monitoring and maintenance period. SRK recommends independent legal review of the site's obligations, particularly concerning property holding and continued monitoring programs up to the estimated close out certification date of December 2060.

3.5 Ranger 3 Deeps

3.5.1 Overview

ERA constructed an exploration decline at the Ranger mine adjacent to the southeastern rim of Pit 3, from early May 2012 to December 2014. The decline enabled an underground exploration and infill drilling program to increase orebody knowledge and provide geological, hydrogeological and radiological data.

The decline extended 2,700 m in length and 450 m below the ground surface, above and parallel to the target mineralisation zone. The decline was intended to provide access to the mineral resource and subsequent underground mine known as R3D.

The decline was extended, and the ventilation shaft constructed between October 2013 and October 2014. Exploration drilling commenced in May 2013 and continued intermittently until September 2014. In 2015, ERA decided not to progress the R3D Project to FS and the project was placed into care and maintenance.

In April 2019, ERA received approval from both the Commonwealth and NT ministers to commence rehabilitation and closure of the R3D exploration decline. Rehabilitation works commenced immediately after approval of the mine closure plan. The 2019 rehabilitation works program included the removal of infrastructure and subsequent backfilling of the vent shaft access. The exploration decline was then allowed to flood naturally to -25 mRL. These works were completed by the end of June 2019. The exploration decline was backfilled during 2021, following the conclusion of processing on the RPA, as required by the Ranger Authority.

While the R3D underground was initially considered by ERA to represent a 'bridging strategy' for development between the completion of the Ranger 3 open pit and the commencement of mining at Jabiluka, future development is now considered unlikely in light of the economic, legislative and operational challenges that exist for the project. If the R3D Project were to be developed at some future point, ERA considers this would not be until the completion of the Jabiluka Project, if that were eventually developed.

3.5.2 Project geological setting

The R3D deposit has no surface radiometric expression and was discovered in 2005 during Pit 3 step-out exploration drilling. The R3D deposit occurs down-dip of the previously mined Pit 3 mineralisation.

R3D is a structurally controlled deposit hosted by arenites, shales and carbonate sedimentary units of the Cahill Formation, which has been regionally metamorphosed to psammites, chlorite schists and magnesite marble, all of which dip at moderate angles to the east. The deposit sits within the Deeps Fault Zone, a north-northwest trending complex reverse fault system controlled by the differing competencies of the local stratigraphy.

The basement rocks at R3D comprise the Nanambu Complex, which comprises granite, gneiss and schists ranging in age from 2,470 to 1,800 Ma. This complex is locally termed the Footwall Sequence (FWS) and is mostly schistose to gneissic, chloritised and sericitised within Pit 1, but moving away from this deposit a more granitic texture was noted in drill core. This textural variability reflects the complex structural history of the succession.

Overlying the FWS is the Lower Mine Sequence (LMS) of the Cahill Formation. The LMS consists of a sequence of carbonates, with interbedded schist and chert. These carbonates range in composition from magnesite to dolomite and can be up to 300 m thick. Along the contact with the overlying Upper Mine Sequence (UMS) lies a brecciated chert approximately 5 m to 15 m thick, which has been mineralised in the upper 100 m from the contact. At depths of less than 330 m below surface, only patchy mineralisation occurs in the LMS, whereas at depths below this, significant mineralisation exists. R3D occurs at depth and has formed as a result of a local fault system.

The UMS is a 500 m thick sequence of quartz-feldspar-biotite schist and microgneiss, which has been altered to quartz chlorite schist in the mineralised zone. Discrete but discontinuous carbonaceous beds are evident in the sequence and most probably represent original black shale beds. The presence of haematite is also noted in structurally disturbed high-grade zones in the deposit.

The Hanging Wall Sequence (HWS) comprises a group of micaceous quartz-feldspar schists with intercalated amphibolitic units and local garnetiferous horizons. Discontinuous bands of magnetite occur low in the HWS and were used as a geophysical marker in regional mapping.

Intrusive bodies into this package include pegmatites and dolerite dykes. The dolerite dykes are interpreted to form part of the Oenpelli Dolerite and have been observed in the western wall of Pit 3. These dolerite dykes intruded along mineralisation-bearing faults and are therefore interpreted to be syngenetic or slightly post-dating mineralisation, possibly because there is scant evidence of the dykes being mineralised. Pegmatite dykes are divided into four categories based on the quartz content and colour: dark green quartz-rich, dark green quartz-poor, light green quartz-rich, and light green quartz-poor. The dark green pegmatites occur mostly in the LMS and show evidence of in situ digestion of LMS rocks. The light green pegmatites occur throughout the mine succession and show evidence of chilled margins and shearing, suggesting they are true intrusives.

The Cahill Formation, consisting of the LMS, UMS and HWS, is unconformably overlain by sandstones, quartzites, conglomerates and breccias of the Kombolgie Formation. The Kombolgie

Formation forms part of the Katherine River Group. Sedimentary structures can still be seen in the Kombolgie sandstones.

Mineralisation

Mineralisation at Ranger is associated with brecciation and structural overprint adjacent to reverse faulting and is closely linked to the geochemistry of the chlorite schist host lithology.

Uranium mineralisation is principally present as pitchblende, is associated with chloritisation and occurs as sooty smudges on joint planes and foliations. Secondary uranium minerals saleeite, sklodowskite, gummite and metatorbenite are common in the oxidised zone.

Gold is present as a zone of up to 1 g/t Au in the higher grade uranium mineralisation, while 0.5 g/t Au is an average for the remainder of the uranium mineralised UMS.

3.5.3 Mineral Resources

Historical estimates

Three previous Mineral Resource estimates (MRE) at R3D were reported in 2010 (Table 3.6), 2014 (Table 3.7) and 2015 (Table 3.8). The first two reported estimates were sourced from the 2014 R3D PFS. The Competent Person for the historical Mineral Resources is Mr Stephen Pevely, MAusIMM, a part-time employee of ERA.

The applied cut-off grade used in the 2010, 2014 and 2015 historical estimates was 0.15% U₃O₈, and 0.11% U₃O₈ for estimates spanning 2016 to 2020 (Table 3.9).

Table 3.6: Ranger 3 Deeps historical Mineral Resource, 2010

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured	-	-	-
Indicated	9.49	0.32	30,820
Inferred	0.65	0.32	2,480
Total	10.14	0.32	33,000*

Source: ERA (2014) – 2014 Prefeasibility Study, Geology. 61801-PFS-RE-PM-0013_1 - Chapter 13 - Geology.pdf

Note: *equating to approximately 72.7 Mlb U₃O₈.

Table 3.7: Ranger 3 Deeps historical Mineral Resource, 2014

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured	3.11	0.33	10,120
Indicated	5.44	0.28	15,950
Inferred	3.64	0.27	9,690
Total	12.19	0.29	34,760*

Source: ERA (2014) – 2014 Prefeasibility Study, Geology. 61801-PFS-RE-PM-0013_1 - Chapter 13 - Geology.pdf

Note: *equating to approximately 76.6 Mlb U₃O₈.

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Table 3.8: Ranger 3 Deeps historical Mineral Resource, 2015

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured (in situ)	2.78	0.32	8,922
Indicated	6.30	0.28	17,336
Inferred	3.50	0.25	8,579
Total	12.58	0.28	34,837*

Source: ASX:ERA 28 January 2016

Note: *equating to approximately 76.8 Mlb U₃O₈

Table 3.9: Ranger 3 Deeps historical Mineral Resource, 2016 to 2020

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured (in situ)	3.72	0.27	10,134
Indicated	10.41	0.22	22,636
Inferred	5.44	0.20	11,087
Total	19.57	0.22	43,857*

Source: ASX:ERA 15 February 2021

Note: *equating to approximately 96.7 Mlb U₃O₈

Current Mineral Resource

As outlined in its ASX announcement dated 28 February 2022, ERA no longer reports any Ore Reserves and Mineral Resources for the RPA (including R3D).

On 8 January 2021, ERA ceased to be authorised to conduct mining operations in the RPA, and accordingly development of R3D is not an authorised activity. ERA does not presently have the authority to mine R3D and is not pursuing such an authority.

In addition to an authorisation to mine R3D, the project would need to be economically viable to support its development. ERA has historically assessed the economics of the R3D Project to be unviable and given the recent work undertaken on the rehabilitation of the RPA, the project would now be required to be able to support a standalone mill and tailings construction among other infrastructure, which would add fixed cost to any future operation, further challenging the R3D Project's viability. ERA has also completed backfill works on the R3D exploration decline.

As such, ERA no longer considers it is able to demonstrate 'reasonable prospects for eventual economic extraction' of the previously reported Ore Reserves and Mineral Resources at R3D, as is required by Section 20 of the JORC Code (2012). No work is currently being conducted on further development options for the R3D deposit.

Mineral Resource risks and opportunities

Risks

ERA has stated publicly that there are currently no RPEEE within the RPA due to a lack of regulatory, social and environmental approvals following the closure of Ranger in 2021 and ERA no longer being authorised to conduct exploration, development and mining activities within the RPA.

Opportunities

The R3D deposit, nominally containing approximately 44 kt of U_3O_8 , remains within the RPA (and underlying ELA9644), but without development consent and possibly marginal economics under prevailing economic conditions. While gaining the regulatory, social and environmental approvals to develop R3D is not impossible, SRK considers it unlikely to occur within a reasonable timeframe, nominally 30 years, given current conditions.

As such, SRK considers that while the deposit may offer limited potential for longer term development, this is currently offset by near term risks associated with the likely economics and ongoing closure of the site, such that little perceived value could reasonably be allocated to the R3D deposit. As such, SRK has considered the R3D mineralisation as an Exploration Target (as defined in the JORC Code 2012) for valuation purposes (refer section 7.7.1).

Exploration potential

SRK understands that the R3D deposit has been extensively drill tested and closed out in all directions. In SRK's opinion, there does not appear to be any further exploration upside potential at R3D.

Similarly, outside of the Ranger mine area, there appears to be little to no potential for further targets given ERA's public statement (refer ERA ASX announcement dated 28 February 2022) that there are no prospects for eventual economic extraction at R3D, and by logical extension, the surrounding exploration prospects within the RPA (and underlying ELA9644).

SRK has reviewed publicly available information pertaining to the reported mineral occurrences within the RPA. This review highlighted six radiometric geophysical anomalies within the area covered by ELA9644 of which four are associated with the Ranger 1 anomaly. Ranger 1 number 1 was mined as the Ranger 1 open pit and Ranger 1 number 3 was mined as the Ranger 3 open pit.

The Ranger 19 and Ranger 63 radiometric anomalies, located toward the north, are not considered by ERA to have high potential for further economic uranium discoveries.

3.5.4 Mining

Overview of former mining operation

Previous mining at Ranger involved a conventional open cut process, which commenced with drilling and blasting prior to load and haul activities. Primary blasthole drilling was carried out using inclined holes typically on staggered blast patterns varying from 4.7–5.4 m by 5.4–6.2 m depending on rock type. The grade of ore at the blasthole cuttings was determined radiometrically, enabling

ore and waste to be fired separately. The bulk emulsion explosive used for blasting was manufactured on site. Powder factors varied by rock type but were typically 0.22 kg/t in mineralised rock and 0.30 kg/t in un-mineralised massive carbonates. All materials were loaded using front-end loaders and transferred from the pit using a fleet of haul trucks. A selection of graders, bulldozers, and water tankers were used for general production support, road and stockpile maintenance and dust suppression. Main ramps were constructed at a 1:10 gradient.

Pit development was influenced by high annual rainfall, particularly during the period from November to March. Bench development was typically planned for the period from June to November when groundwater seepage was at a minimum and resulted in minimal production delays. During the peak of the wet season, the lowermost bench was often underwater and occasionally the next lowermost bench inaccessible for periods of up to several days. A pit dewatering system incorporating pontoon mounted submersible pumps staging to a pressure tank was used during these periods with power supplied from the site generating station. Ore stockpile volumes were maintained several years ahead of processing requirements to accommodate interruptions to mining resulting from high rainfall.

Pit 1 was mined out in 1994 and mining in Pit 3 ceased in November 2012. Bench heights used in the open pits were 7 m and 10 m respectively, pit slopes varied between 35° and 50° and final pit depths were -150 mRL (Pit 1) and -265 mRL (Pit 3).

As mining progressed, mined material was categorised for either stockpiling or immediate processing (Table 3.10). Low-grade ore and non-mineralised rock were stockpiled for return to the mined out pits and contoured to create the final landform.

Table 3.10: Indicative ore grades and mineral type

Grade	Grade (% U ₃ O ₈)			Material type
	1980–1997	1998–2009	2010–2021	
1	<0.02	<0.02	<0.02	Non-mineralised rock
2	0.02–0.05	0.02–0.08	Low 2 0.02–0.06	Very low-grade ore
			High 2 0.06–0.08	Low-grade ore
3	0.05–0.10	0.08–0.12	0.08–0.12	Ore
4	0.10–0.20	0.12–0.20	0.12–0.20	Ore
5	0.20–0.35	0.20–0.35	0.20–0.35	Ore
6	0.35–0.50	0.35–0.50	0.35–0.50	Ore
7	>0.50	>0.50	>0.50	Ore

Source: ERA (2022) – 2022 Draft Mine Closure Plan - Chapter 2 - Project Overview.pdf

In 2011–12, ERA was planning to transition from open pit to underground exploration of the R3D deposit. The Company committed A\$120 M to the construction of an exploration decline to conduct closely spaced underground exploration drilling and explore areas adjacent to the R3D resource. Construction of the exploration decline commenced in May 2012, with the box-cut and portal access successfully completed in October 2012. Excavation of a 6.0 m high and 5.5 m wide decline tunnel commenced shortly thereafter. In 2014 a 3 m diameter vertical ventilation shaft was also constructed to a depth of 280 m below the surface.

The exploration decline project comprised a three-stage construction program and an underground drilling program. The first phase of development was completed in April 2014 and involved construction of a 185 m entrance portal and 1,900 m of tunnel development. The second phase involved construction of a low-profile ventilation shaft and an extension of the decline to a distance of 2,710 m. The third phase involved developing a 40 m cross-cut through the deposit. The cross-cut was designed to gather further data to validate mine design assumptions. The exploration drilling occurred in parallel with the decline construction and comprised a total of 47,000 m of closely spaced drilling.

Mining studies

In parallel with the construction of the exploration decline, ERA commenced a PFS into the potential development of an R3D underground mine. This study was designed to assess the economic viability of the project, optimise mining methods and confirm metallurgical performance and likely production rates. The study also included designs for associated surface infrastructure such as the power plant, cooling facilities for underground air supply, a paste plant for backfill operations and nine low-profile ventilation shafts.

This study identified bottom-up, longhole open stoping with paste backfill as the preferred mining technique, with ore production of up to 1.2 Mtpa over a 5–9 year mine life (depending on the option adopted). This approach maximised use of existing surface infrastructure including the exploration decline as a production decline, reuse of processed tailings material for the paste backfill operations and construction of a paste plant at the surface. Mining levels were envisaged to be developed at 15 m to 30 m vertical intervals. The ore was to be blasted using blastholes drilled from either level and charged with explosives. The blasted ore would be loaded into 60 t trucks using load haul dump loaders. The trucks would haul the ore to the surface via the decline ramp. Bulk heads (walls) would be constructed across the entrance to the empty stopes and the void would be backfilled with cemented paste. The paste was expected to comprise de-slimes mill tailings, crushed rock and binders. Adjacent stopes would then be mined once the fill had attained a strength of 0.5 MPa (curing time 2–4 weeks).

In June 2015, ERA announced that the R3D would not proceed to a final FS largely driven by two factors: i) the Board's view that the uranium market had not improved as ERA had previously expected and there was uncertainty regarding the uranium market's near-term direction; and ii) the economics of the R3D Project required operations to continue beyond the date set by the current Ranger Authority (i.e. 8 January 2021) to demonstrate economic viability (ERA ASX announcement dated 11 June 2015). This decision not to progress the project was supported by ERA's major shareholder, Rio Tinto.

3.5.5 Processing

Overview of former processing operation

There is an extensive operating history for the Ranger mine's processing of the open pit ores across a range of feed types including laterite, transitional and fresh feeds. This included the processing of medium and low-grade stockpiles following the cessation of mining activities. Substantive historical testwork and associated processing studies completed on the Ranger deposits, including the R3D underground deposit, further supplements the metallurgical

understanding of these deposits. SRK has a high degree of confidence in the amenability of the Ranger Mill, or one of like configuration, to treat similar uranium ores.

The 'Ranger Mill' as it is often colloquially described, even though it incorporates hydrometallurgical circuits, adopts a long established, conventional uranium processing flowsheet reflective of other well-known operations. For example, it is very similar to BHP's Olympic Dam uranium flowsheet, although there are minor nuanced differences such as the use of pyrolusite as an oxidant (at Ranger), rather than sodium chlorate. The plant incorporates beneficiation, oxidative acidic leach under ambient conditions, neutralisation, CCD, solvent extraction (SX), ammonium sulfate stripping, ammonium diuranate precipitation, dewatering and calcination to produce a U_3O_8 product and drumming (packaging) of the final product prior to trucking to port for export to international customers.

The R3D underground deposit has not been treated through the existing Ranger processing facility. Historical testwork was undertaken to confirm the ability of this plant to treat the potential future feed from R3D. Testing was undertaken on various composite and variability samples, including samples taken from drilling from the R3D exploration decline and associated platform, and can be considered representative for the purposes of a PFS.

Comminution (crushing and grinding) testwork demonstrated that the R3D samples behave similarly to the historical open pit ores processed, i.e. not materially harder or different to the open pit fresh feed. Mineralogy work showed the deeper uranium mineralisation to be associated with the chloritic schists in the UMS and the elevated carbonate/dolomite component of the LMS was 'barren' which allows partial removal of the acid consuming carbonate through a beneficiation process. There are some areas of elevated pyrite associated uranium mineralisation that would need to be blended. Acid leaching under ambient oxidising conditions, neutralisation and settling (via CCDs), phase disengagement (via SX) and the associated implications of the testwork results on recovery algorithms, scale-up from laboratory to commercial plant size, and other techno-commercial inputs were reasonably advanced.

As a result of this historical testwork, there is a good geometallurgical understanding of the R3D deposit and there is a reasonable expectation that the ores and processing performance will be similar to the fresh ores treated from the former open pits. Other independent reviewers have also reached this general conclusion. For example, as part of ERA's previous MRE reporting, it was noted that '*Geometallurgical studies have confirmed that there are no significant mineralogical differences between R3D mineralisation and that process treatment and recoveries are similar to ore from the now completed Ranger 3 pit*' (Pevly et al., 2014).

Of note and relevance to the underground ores, it is reported that there are two main styles of uranium mineralisation at R3D, with greater than 65% of the uranium resource occurring in brecciated chlorite schists of the UMS and the remainder occurring in the deeper LMS carbonates hosted by bedding parallel brecciated schist horizons. Of the carbonate hosted uranium, particularly in the LMS, it is known that approximately 20% of the underground mineralisation contains elevated carbonate. The weighted average calcium (Ca) grade of the 12.2 Mt R3D resource was previously estimated at 2.25%, at a U_3O_8 cut-off grade of 0.285%. This has ramifications on the acid consumption and the associated operating costs, milling rates, blended feed grades and other process flow constraints.

During previous studies, the elevated calcium grades were not considered to negate the ability to treat the R3D material. ERA's intent was to consistently reject a significant portion of this material through existing radiometric (and alternatively optical) sorters to reduce the carbonate levels to below 1% Ca in the overall feed blend, prior to being fed through the existing processing facility. This would then be blended with medium and low-grade uranium stockpiles, also containing lower calcium grades.

Ore sorting technology has been further advanced since these studies were undertaken and would likely improve the performance of a new circuit. There are alternative carbonate removal processes that have been successfully tested on this material, including flotation. Other beneficiation processes such as magnetic separation, heavy media separation or scrubbing have been less effective. If the R3D deposit was to be processed in future, further work would be required on sequencing blending and to confirm the process flowsheet and leaching circuit sizing is suitable for the higher carbonate feed. The forecast processing costs would need to be updated to reflect the higher acid consumption requirements – particularly, given that the stockpiles that were to be blended with the underground feed to help manage calcium grades have now been exhausted.

While no fatal flaws were identified in the historical R3D work, it is no longer at a PFS level of study confidence. Metallurgical testwork was not considered to be at a PFS level of confidence by technical representatives of ERA's majority shareholder, Rio Tinto, during an internal peer processing review undertaken in December 2014. This assessment highlighted several gaps in the program that had been completed and the application of the results to the study's project assumptions. While no fatal flaws were identified in that review, the Rio Tinto Technical and Innovation group made several recommendations for further work to be undertaken as part of the proposed FS program.

In SRK's opinion, the historical performance and additional testing sufficiently demonstrate that the Ranger processing facility or the equivalent, is amenable to treatment of this material, if it were to be eventually processed. There were, and still are, several processing risks including: material blasting fragmentation and the impact on screening and the amount of feed suitable for ore sorting, the estimates of ore sorting uranium and mass recovery, paste fill and/or shotcrete ingress to the run of mine resulting in increased acid addition (higher cost), and differences in ore properties such as more refractory uranium species leading to lower recoveries and/or higher carbonate levels than planned.

While the testing of the R3D deposit has not identified any metallurgical issues, the lack of a processing facility to treat the R3D ore is a likely fatal flaw. The cessation of processing at Ranger occurred on 8 January 2021. ERA is now obligated to decommission the plant and associated processing, and non-processing infrastructure, and then undertake demolition and site rehabilitation works. SRK understands that the plant decommissioning has been advanced to a 'make safe' state. Demolition has not yet been undertaken and the plant site has not yet been rehabilitated.

As a result, there is no immediate processing option for the R3D deposit. If the R3D ores were ever to be treated, this would need to be through a new dedicated greenfield plant, or alternatively, through an alternate plant, for example if one were constructed at Jabiluka or at a remote site. The associated capital cost, operating cost or other aspects of the viability and/or likelihood of this option, including approvals has not been established.

The previous PFS assessment of the R3D Project issued in Q4 2010, assumed underground mining and processing within the RPA would cease in Q4 2020, i.e. prior to the expiry of the authority to mine and process. The project economics did not generate a net present value that would be sufficient to meet the cost of a new processing facility, nor new supporting infrastructure. The Ranger processing option is no longer available to the Project. In SRK's opinion, it is unlikely that a standalone R3D Project would support a new processing facility.

From a processing perspective, the decision to rehabilitate the Ranger site including the processing facility and the decision by ERA to permanently cancel the R3D Project and the lack of alternative treatment options contributed to the RPEEE resource test, i.e. whether there are 'reasonable prospects for eventual economic extraction'. This is reflected in ERA's ASX announcement relating to the 'Annual Statement of Reserves and Resources', issued in February 2022, in which the Company reported that: *'The expiry on 8 January 2021 of the right to mine and process ore on the Ranger Project Area (RPA) under the Ranger Section 41 of the Atomic Energy Act extinguished any reasonable prospects for eventual economic extraction of previously reported Ranger Ore Reserves and Mineral Resources, as is required by Section 20 of the JORC Code 2012'*.

Without a defined processing option, other modifying factors used for reserve estimation purposes and for DCF assessments of the project need to be reviewed if there was future consideration for treatment of the R3D deposit. In particular, metallurgical recoveries and processing costs, as well as capital requirements. Various U₃O₈ recoveries have been used in previous internal studies and estimations. The 2014 PFS assumed a life of mine (LOM) recovery of 86%, whereas previous reserve estimates were premised on a U₃O₈ recovery of 84% from the fresh ores (and lower for laterites/oxides). Ultimately, recovery is partly dependent on any new circuit and is sensitive to feed U₃O₈ grade, carbonate grade, the use of sorting, blending, leach tank residence time, and the downstream processing flowsheet selected and final product generated.

In respect to the likely processing costs, they have not been sufficiently estimated to allow them to be confidently incorporated into DCF modelling, i.e. to a PFS level of confidence. Benchmarking historical costs would no longer accurately reflect the future processing of future ones if treated through a new plant. The underground production rate (i.e. 1.2 Mtpa) would be lower than that historically treated at Ranger, and this would impact the fixed versus variable components of the costs. Despite uranium prices improving recently, acid consumption costs are likely to be higher, and recent inflationary pressures which have resulted in increased unit power, reagent, freight, maintenance and labour costs will all serve to increase the overall production costs.

In SRK's opinion, despite the significant historical testwork completed and the expected amenability of the R3D underground material to treatment through a conventional uranium processing flowsheet equivalent to that employed by the Ranger Plant, given the limitations listed below, the R3D deposit cannot be considered as being at a PFS level of study. As a result, from a processing perspective, the R3D Project cannot be valued on a DCF basis.

- metallurgical testwork is not at a PFS level of confidence
- several technical challenges remain to be adequately resolved
- there is no identified processing facility option
- no capital cost estimate has been provided for development of a new processing facility
- no process operating cost estimate has been made associated with a new processing facility.

3.5.6 Infrastructure

Up until recently, the Ranger site had all the requisite facilities and equipment to both mine and process uranium ores. The infrastructure was extensive and included open pit workings (Pit 1 and Pit 3), Ranger 3 Deeps exploration decline and other mining earthworks connected by a network of haul roads and other access (tracks, service corridors and other linear infrastructure), processing plant, TSF¹⁰, mine waste dumps, stockpiles, power plant, water treatment and water management areas (including bores), site offices, workshops, wash-down bays, refuelling facility, explosives magazine, nursery, core-yard, mine accommodation and demountable village, landfill sites, bioremediation pads and drill pads.

The Ranger TSF was commissioned in 1980 and is a ring dyke tailings dam. It is an approximate square with each of its sides measuring ~1 km in length. The initial dam design was for a proposed crest level of 51.0 mRL, however additional designed structural additions allowed the crest limit to attain 60.5 mRL. Neutralised mill tailings were deposited in the TSF from 1980 to 1996, after which time mill tailings were sent to the mined-out Pit 1. Once Pit 1 reached its maximum tailings level, mill tailings were directed to the TSF from 2008 to February 2015, when the mined-out Pit 3 became available.

Several stockpiles of ore grade material and waste were situated within the vicinity of the mine pits and the TSF. Upon closure, these had been largely depleted with only minimal material remaining post-January 2021.

The Ranger mine footprint is divided into catchment areas which generate surface run-off and/or seepage for water management purposes. Each catchment may comprise several elements such as retention ponds, sumps, collection basins and groundwater interception ponds. Ranger operated three water treatment plants to treat excess pond water to a level suitable for release to the surrounding environment. Ranger also commissioned a brine concentrator in 2013 to produce 1.83 GLpa of clean distilled water with discharge via a wetland filter to Magela Creek with brine transferred to the TSF. In 2015, ERA completed five injection bores in Pit 3 to pump brine from the brine concentrator directly into the underfill layer at the base of Pit 3 for final storage, and an additional three injection bores are being constructed at present as part of rehabilitation works.

ERA ceased mining and processing uranium at Ranger on 8 January 2021, with the site infrastructure now being removed, demolished and rehabilitated in preparation for eventual mine closure in accordance with the stipulated timeline of 8 January 2026.

Mine closure activities at Ranger are discussed in detail in Section 3.4 of this report.

¹⁰ The TSF, Pit 1 and Pit 3 were all approved for the storage of tailings and process water in accordance with relevant conditions prescribed in the Ranger Authorisation.

4 Jabiluka Project

4.1 Overview

The Jabiluka 1 deposit was discovered in 1971 by Pancontinental. In 1973, further drilling located the larger Jabiluka II deposit approximately 1 km to the east.

Jabiluka lies 22 km north of the Ranger mine on the edge of the Magela Creek floodplain. It is surrounded by the Kakadu National Park, but the ML is excluded from the national park and adjoins the RPA to the north. Jabiluka II hosts resources in excess of 137,000 t of contained uranium oxide and is one of the world's larger, high-grade uranium deposits.

ERA continues to maintain the Jabiluka site in line with the Long Term Care and Maintenance Agreement, as first announced to the market in February 2005.

4.1.1 Project history

Jabiluka has been studied on an intermittent basis for over 50 years.

In 1969, the Bureau of Mineral Resources (now Geoscience Australia) flew the first fixed wing airborne magnetic/radiometric survey over part of the Alligator Rivers area. No radiometric anomalies were detected from this survey. In 1971, Pancontinental conducted a helicopter borne radiometric survey over MLN1 that did not detect either Jabiluka I or II, but did detect other anomalies that were subsequently followed up. In the 1971 dry season a hand-held radiometric survey detected Anomaly 7e (Jabiluka I). Although given a low ranking, a detailed radiometric grid survey was conducted over the anomaly; one of the anthills in the area had a very high radiometric count, which provided sufficient evidence for follow-up. Costeans were dug and secondary uranium mineralisation at Jabiluka I was intersected. Between 1971 and 1973 the area was drilled using diamond and percussion drilling.

The Hades Flat prospect, located in the south of MLN1, was discovered in 1971. A series of auger, diamond and percussion drilling programs were conducted between 1971 and 1976.

Scout drilling to the east and west of Jabiluka I, along the strike of mineralisation, led to the discovery of the Jabiluka II mineralisation to the east of Jabiluka I. Between 1973 and 1976 percussion and diamond drilling (DD) at Jabiluka II was carried out. In November 1976 Pancontinental formed the Jabiluka Division to handle the development of the deposit. During 1977 to 1979, further DD and resource assessment was performed. An EIS was lodged as a precursor to the granting of permits to develop the project.

An EIS for the Jabiluka Project was approved in August 1979. In August 1982, MLN1 was granted by the NT Government for a period of 42 years following the signing of an agreement with the NLC representing Aboriginal owners. The agreement, approved by the Commonwealth, was to provide funding to local Aboriginal people up to the end of construction and then royalty type payments.

By late 1982, all necessary mining and environmental approvals had been obtained to commence mining of the Jabiluka II deposit. However, the change of government in 1983 led to the implementation of the Labor Party's 'Three Mines Policy', resulting in the withdrawal of Commonwealth approval and development ceased.

In 1987, Pancontinental acquired the 35% interest that it did not already own in the project from Texaco.

In August 1991, ERA purchased the Jabiluka project from Pancontinental for A\$125 M. As part of the ERA purchase, the NLC, on behalf of the Traditional Owners, assigned Aboriginal approvals to ERA.

Subsequently, ERA undertook drilling programs in 1992 to 1993, consisting of Mineral Resource definition and geotechnical assessment. ERA undertook a FS on the Jabiluka development in 1993 and significantly changed the design of the project from that of the original Pancontinental plan. The study envisaged an underground mine, with ore being milled and treated at the existing Ranger site and tailings disposal also at Ranger.

In October 1996, a new EIS was submitted for public review which outlined two options: mining and milling uranium ore at Jabiluka (similar in concept to the Aboriginal approved Pancontinental design but now significantly smaller in impact); and trucking Jabiluka ore to the existing Ranger Mill for processing. In response to the public review, a supplement to this EIS was submitted in June 1997 which focused on the concept of trucking Jabiluka ore to the Ranger Mill for processing.

In October 1997, the Commonwealth Government announced that the Jabiluka proposal had completed environmental procedures and would be subject to stringent conditions. In recognition of Aboriginal approvals received in 1982, ERA put forward an alternative to process the ore at Jabiluka. This Jabiluka Mill Alternative was subject to a Public Environment Report (PER) and further public review. Environmental approvals for this alternative were received in August 1998 and subject to strict environmental conditions, provided ERA returned all tailings to the underground mine voids. This completed the Commonwealth approvals process for the project.

In May 1998, ERA began consultations with the NLC, who act on behalf of the local Aboriginal people, in relation to the change in design for the Jabiluka proposal. Final NT approvals for the development of the mine were received in June 1998.

ERA commenced stage one of development at Jabiluka on 15 June 1998. This phase was completed on 4 July 1999 and included surface works, a water management pond and the construction of a 1,150 m exploration decline and a further 700 m of development to provide drilling access to the deposit. Approximately 50,000 t of mineralised material was removed during development and stockpiled under cover on surface. From 1998 to 1999, ERA conducted underground DD after the development of the exploration decline and cross-cut.

Following ERA's completion of stage one development, the 17 ha development site (which included surface works, a water management pond and exploratory decline – all of which are common to both development options at Jabiluka) was placed on standby with environmental care and maintenance to facilitate further community discussions regarding the project.

In 2000, following intensive drilling from the underground access to the Jabiluka deposit, ERA revised the overall Mineral Resource with some reduction in overall Ore Reserves. ERA continued to report Ore Reserves at Jabiluka up until 2015 when these were reclassified as Measured and Indicated Resources.

In 2003, the NT Government approved ERA's proposal for long-term care and maintenance of the Jabiluka site. The stockpiled material was backfilled to the decline along with a similar amount of waste rock, with these works completed in late 2003. ERA completed improvements to the water management and environmental management of the site.

In 2004, ERA and Rio Tinto declared Jabiluka would not be developed without Mirarr approval. The Jabiluka LTCMA was signed by the Mirarr Gundjeihmi Aboriginal people, ERA and the NLC, and defines the arrangements for the Jabiluka lease area. This agreement obliges ERA (and its successors) to secure Mirarr approval prior to any future mining of the Jabiluka deposit (refer ERA ASX announcement dated 25 February 2005).

Between 2005 and 2015, the Jabiluka site was rehabilitated with ongoing management and monitoring. In 2013, ERA committed to rehabilitating the Interim Water Management pond.

In January 2016, ERA announced it had written back all Jabiluka Ore Reserves to Mineral Resources. Previously identified Jabiluka Ore Reserves were re-classified and incorporated into the existing Mineral Resources¹¹. These Ore Reserves had been grandfathered under the JORC Code (2004) version following the signing of the LTCMA, but were updated in line with the JORC Code (2012) version in 2015.

Up until 2022, further underground designs and the project economics were reviewed as part of limited desktop exercises, but no further substantive exploration, Mineral Resource or Ore Reserve work were completed. The most recent update was in 2011, when ERA conducted an update of a 2007 OoM mining study in conjunction with Rio Tinto Technology and Innovation.

A series of six 'criteria status reports' for rehabilitation outcomes were prepared as part of documenting a mine closure plan for Jabiluka in 2024 (2rog Consulting, 2024). The reports assessed rehabilitation completion criteria for landforms, surface water, groundwater, ecosystems, radiation and cultural aspects. The reports concluded that biophysical criteria for rehabilitation at Jabiluka have been substantially satisfied. No specific assessment of cultural outcomes was provided: the 'cultural criteria' report merely referenced the results of reviews of surface water, groundwater, radiation, landform and ecosystem conditions. SRK completed a cursory review of the status reports. While the information presented in the status reports generally supports the positive conclusions drawn by 2rog, some elements of the reviews may be challenged by government technical reviewers as the reports do not always provide sufficient data or compelling analysis to support the conclusion that criteria are 'complete'. The status of cultural criteria cannot be assessed without input from relevant Traditional Owners.

Recent history pertaining to the renewal of the Jabiluka MLN1 is discussed above in section 2.3.2.

¹¹ Pages 14 and 17 of ERA's 2015 Annual Report as released to the market on 15 February 2016 <<https://announcements.asx.com.au/asxpdf/20160215/pdf/4351gdp1q5dzl6.pdf>>.

4.2 Permitting and approvals

Four key types of consent are required to conduct mining and mineral processing in the NT:

- Grant of a mineral entitlement (under the *Mining Act 1980* or subsequent Acts, such as the *Mineral Titles Act 2010*)
- Land access authorisation under the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth)
- Primary environmental approvals under the NT *Environment Protection Act 2019* and the Commonwealth *Environment Protection Biodiversity Conservation Act 1999*
- Various operating consents, including (but not limited to) approvals under the NT *Mining Management Act 2001*, the *Water Act 1992* (as amended), the *Australian Radiation Protection and Nuclear Safety Act 1998*, and Customs (Prohibited Exports) Regulations 1958 under the *Customs Act 1901*.

4.2.1 Mining tenure

The Jabiluka deposit lies within granted mining lease, MLN1. The 7,275 ha lease was granted to Pancontinental Mining Limited on 12 August 1982 and was due to expire on 11 August 2024. Under the terms of the original grant of mining tenure in 1982, Clause 2 made provision for renewal of tenure in the following terms:

“2. The Territory covenants with the lessees that, provided the lessees have complied with the Mining Act and the conditions to which this lease is subject, the Minister at the expiration of this lease and in accordance with that Act will renew [emphasis added] this lease for a further term not exceeding ten (10) years.”

The Act referred to in Clause 2 was repealed on 7 November 2011 and replaced by the *Mineral Titles Act 2010*. Under Section 43 of the *Mineral Titles Act*, a lease holder may apply for an extension to the term of the ML before the end of the term of an ML. The Minister *may renew* [emphasis added] the ML over all or part of the title area for the term the minister considers appropriate (but normally not exceeding 10 years). The ML may be renewed more than once.

In discussions on 7 February 2025, ERA’s legal adviser (Mr D Nolan) stated that ERA’s position is that provisions in the *Mineral Titles Act 2010* preserve ERA’s rights to obtain a renewal of the ML in accordance with the original agreement such that the Minister is obliged to renew tenure (for some unspecified period not exceeding ten years), providing the holder of the tenement has complied with tenement conditions.

The NT and Commonwealth Governments have placed a different construction on those provisions, given that the NT Minister formally refused to grant ERA’s application for extension of tenure (on the advice of the Commonwealth Minister) on 26 July 2024.

These matters and other issues concerning the manner in which the NT Minister and Commonwealth Minister undertook their decision-making process and exercised their powers for the renewal application are the subject of ongoing Federal Court proceedings.

The current Commonwealth Government appears to have little appetite for facilitating access to the Jabiluka area for uranium exploration or mining¹². A series of media releases by the Minister for the Environment, the Minister for Resources and for Northern Australia, the Minister for Industry and Science and the Prime Minister in mid-2024¹³ reinforce the federal government's intention to incorporate the Jabiluka area into the Kakadu National Park (as was previously done in the case of the Koongarra Project Area in 2013). As at the date of this report, SRK has found no evidence of tangible actions by the federal government to give effect to its proposal to incorporate the Jabiluka Project Area into the National Park. However, as noted in Section 2.3.2 of this report, a general reserve was gazetted over the area corresponding to MLN1 on 5 June 2024 under the *Mineral Titles Act 2010* (NT). The reservation will take effect when MLN1 has ceased to be in force. Once the reservation is active, both exploration and mining will be prohibited.

4.2.2 Access to Aboriginal land

The entirety of MLN1 lies within land to which the *Aboriginal Land Rights (Northern Territory) Act 1976* applies. Under the Act, 'Aboriginal land' means land the subject of a deed of grant held in escrow by a Land Council. The NLC administers land over the Jabiluka area on behalf of Traditional Owners and is responsible for negotiating mining and land access agreements in the area. Section 48C of the Aboriginal Land Rights Act specifies that Acts authorising mining for minerals do not allow access by mineral entitlement holders to Aboriginal land unless either:

- a. the Governor-General has, by Proclamation, declared that both the Minister and the Land Council for the area in which the land is situated have consented to the application of that Act in relation to entry on that land; or
- b. the Governor-General has, by Proclamation, declared that the national interest requires the application of that Act in relation to entry on that land.

There is some dispute as to whether the agreement executed between the NLC, Pancontinental and Getty Oil under Section 43 of the Aboriginal Land Rights Act in 1982 is valid. There are suggestions that the 'Jabiluka Agreement' was entered into under duress and did not involve free, prior and informed consent (Parliamentary Inquiry into the Jabiluka Uranium Mine Project, 1999). ERA has given repeated public assurances that it will not mine at Jabiluka without the agreement of Traditional Owners.

¹² SRK notes that a federal election is due in Australia no later than 17 May 2025. If there is a change in government, there may also be a change in the Commonwealth Government's stance on mining at Jabiluka.

¹³ <https://www.theguardian.com/australia-news/article/2024/jul/27/jabiluka-decision-ends-long-running-battle-and-preserves-some-of-the-oldest-rock-art-in-the-world> *The Guardian*, 22 July 2024.

<https://www.afr.com/politics/federal/albanese-kills-uranium-mining-at-jabiluka-20240726-p5jvwv>
Financial Review, 26 July 2024.

<https://www.minister.industry.gov.au/ministers/king/media-releases/work-begins-add-jabiluka-site-kakadu-national-park>, 27 July 2024

Recent media releases by the GAC, which represents the Mirarr People, indicate that the Mirarr People are implacably opposed to mining at Jabiluka¹⁴ and that this opposition has been unwavering and of longstanding. Publicly available documentation shows an extensive history of efforts by the Mirarr to prevent mining at Jabiluka, for example:

- A report issued by the Commonwealth of Australia in 1977 (Fox, RW, Kelleher, GG and CB Kerr), Ranger Uranium Environmental Inquiry Second Report (1977) noted that ‘...*the traditional owners [and]... the Northern Land Council (as now constituted) are opposed to the mining of uranium on that site. The Northern Land Council, as constituted before the land rights legislation was passed, had expressed the same view to us...*’ refer Page 9 of the ‘Fox Report’)
- Some 20 years later, a Senate inquiry report (Commonwealth of Australia, 1999. Senate Inquiry into the Jabiluka Uranium Mine Project – Jabiluka: The Undermining of Process) stated, ‘...*The Mirarr people have consistently opposed the development of Jabiluka since the project was revived in 1996... The Committee heard extensive and credible evidence to suggest that undue duress was placed on Aboriginal leaders during the negotiation process and that their wishes were disregarded by the NLC at crucial stages of the process...*’ (Page 77) and ‘...*since the revival of the proposal in 1996, the Mirarr clan, the Traditional Owners of the area which includes the Jabiluka lease, have opposed the mine and have undertaken extensive lobbying and legal action to have the lease annulled and to prevent the mine’s construction and development.*’ (Page 80).
- In 1999, the United Nations Educational Scientific and Cultural Organization (UNESCO) also noted Mirarr opposition to mining development at Jabiluka: ‘...*The traditional owners of the Jabiluka Mineral Lease (the Mirarr Aboriginal people) and individuals and groups speaking on behalf of the traditional owners have opposed the mining proposal because they believe that mining at Jabiluka will have an irreversible impact on the integrity of the World Heritage cultural and natural values of Kakadu National Park and the cultural heritage of the Mirarr people...*’.

The legal advisor to the Mirarr, Ms Susan O’Sullivan, repeatedly emphasised the unanimous opposition of Traditional Owners to mining development at Jabiluka in discussions with SRK in February 2025. Negotiation of an agreement with the NLC – which is obliged under the Aboriginal Land Rights Act to consult with Aboriginal people affected by the grant of an exploration licence (and any other mining licence) about the terms and conditions of the licence, should it be granted – is likely to be protracted and difficult – if not impossible.

¹⁴ 19 April 2024:
<https://www.mirarr.net/media/W1siZiIsIjIwMjQvMDQvMTkvOXJyODJscW93Ni8yMDI0XzA0XzE5X0dBQ19vblI9OVEdfTUxOMV9hcHBsaWNhdGlvbI9maW5hbC5wZGYiXV0/2024-04-19%20GAC%20on%20NTG%20MLN1%20application%20final.pdf?sha=ddcddd467fc6c19a>

5 June 2024:
<https://www.mirarr.net/media/W1siZiIsIjIwMjQvMDYvMDUvNm9IMHN3dnN4el8yMDI0XzA2XzA1X0dBQ19vblI9OVEdfSk1MX2dhemV0dGFsX0ZJTkFMLnBkZiJdXQ/2024-06-05%20GAC%20on%20NTG%20JML%20gazettal%20FINAL.pdf?sha=7480f6a651c43c0c>

4.2.3 Environmental assessment and permitting

Historical assessment and permitting

An EIS for mining at Jabiluka was prepared and submitted to the Commonwealth Government in 1979. The original Pancontinental proposal involved an open cut mine, with a tailings dam and milling facilities located on the Jabiluka lease. By late 1982, all necessary mining and environmental approvals (including environmental approval under the (now repealed) *Uranium Mining (Environment Control) Act 1979*) to allow mining of the Jabiluka II deposit had been obtained. However, the change of government in 1983 led to the implementation of the Labor Party's 'Three Mines Policy', resulting in the withdrawal of Commonwealth approval and development ceased.

In 1996, when changed uranium mining policies had been introduced by the Liberal-National Commonwealth Government, ERA submitted a revised EIS proposal for an underground mine, from which the ore would be trucked to Ranger for milling. Tailings would be disposed of in the mined-out pits at Ranger. This new proposal would entail the construction of a 22 km road between the two sites and require the approval of the Traditional Owners. This option was known as the RMA and was outlined in a 1997 EIS prepared by ERA.

When it became clear that the Mirarr People would refuse to allow the construction of the access road or milling at Ranger, ERA developed a second option which involved the milling of mined ore and tailings disposal at the Jabiluka site. ERA's preferred option, outlined in a PER of 1998, was for the disposal of half the tailings underground in mined-out stopes, and the remainder in purpose-built pits near the surface. A second option was for the entire tailings to be disposed of underground, which would involve the excavation of more rock to create room. These options were known as the JMA.

On 2 June 1998, following the conclusion of the EIS process for the RMA, but prior to the conclusion of the PER process for the new JMA, the NT Government granted an authorisation under the *Uranium Mining (Environment Control) Act 1979* allowing the construction of those parts of the project 'common' to both the RMA and JMA, being the portal, access decline and associated infrastructure. Construction work on the mine began in June 1998. Approval for the JMA option was eventually granted by the Federal Minister for Resources and Energy on 27 August 1998, subject to a range of implementation conditions.

Following ERA's completion of stage one development in 1999, the Jabiluka operation was placed on standby with environmental care and maintenance to facilitate further community discussions regarding the project.

Assessment and permitting of future mining at Jabiluka

SRK notes that mining at Jabiluka was previously subject to various assessments under the *Environment Protection (Impact of Proposals) Act 1974*, an Act subsequently repealed by the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The project approved at Jabiluka in 1998 is almost certain to differ in material particulars from any future developments proposed at Jabiluka. Information standards required for environmental impact assessments are now significantly more stringent than at the time of the previous

assessments. Accordingly, a new referral and assessment would be required if development of the Jabiluka deposit is proposed in future. At the very least, future mining at Jabiluka would be treated as a 'significant amendment' to the previous approval and the time required to complete permitting would not differ materially to the time required to carry out assessment of a new project. Authorisations under both NT and Commonwealth environmental legislation would be required.

Assessment Under the *Environment Protection Biodiversity Conservation Act 1999* (Cth)

Assessments under the EPBC Act can be conducted under a bilateral assessment agreement with the NT (Commonwealth of Australia, 2014) or, alternatively, can be separately assessed by the Commonwealth and the NT. In either case, separate decisions will be issued on whether the project will be approved and – if so – subject to what conditions. Mining at Jabiluka is certain to trigger assessment under the EPBC Act, unless the minister determines, within 20 business days of the project referral, that the proposed action is 'clearly unacceptable'. If that were to occur, a range of options is available for either modifying the project or seeking ministerial review. Given the Commonwealth's stated intention of incorporating Jabiluka into the Kakadu National Park, it is unlikely that approval under the EPBC Act would be granted.

If a review decision were requested, the time for completion of the review would probably be in the order of 60 to 80 business days (10 business day public comment period, indefinite period for DCCEEW to prepare a report and 20 business days for the minister to review their decision).

If the project is not deemed to be 'clearly unacceptable', and not assessed under a bilateral accredited process, it would most likely be assessed via an EIS. This is the assessment path nominated by the Commonwealth when ERA referred its proposed R3D Project under the EPBC Act in 2013.¹⁵ The Olympic Dam project at Roxby Downs was also assessed via an EIS. Uranium projects assessed under the bilateral assessment path include Cameco's Yeelirrie uranium project, Toro's Wiluna uranium project and Vimy Resources Limited's (Vimy's, now Deep Yellow) Mulga Rock project.

The time required to complete an assessment under the EPBC Act will depend principally upon whether the project is assessed under an accredited process (in which case the federal processes may add in the order of 6 weeks to 6 months to the NT assessment timelines). Commonwealth guidelines indicate that federal decisions on projects assessed under a bilateral process must be made within 30 business days of receiving an assessment report from the collaborating jurisdiction, but it is not unknown for the Commonwealth to either request additional information from the project proponent or to extend the time allowed for deciding whether to approve the project, or both.

Assessment under the Northern Territory *Environment Protection Act 2019*

In the NT, projects considered to have the potential for significant environmental impact are required to be referred to the Environment Protection Authority (NT EPA) for possible assessment under the *Environment Protection Act 2019* (Environmental Protection Act). Mining at Jabiluka would trigger a requirement for an EPA assessment. The EPA does not decide whether or not a proposal may be implemented, rather it advises the responsible minister (Minister for Environment,

¹⁵ The Ranger 3 Deeps project was withdrawn from EPBC Act assessment in September 2021.

Parks and Water Security) whether the proposal may be implemented and if so, subject to what implementation conditions. If the NT EPA determined that proposed action will have an unacceptable environmental impact and the impact cannot be appropriately avoided or mitigated, it may prepare a statement of unacceptable impact for the minister.

The EPA has a range of options for the process it uses to assess significant projects. A conventional assessment path is via an EIS (which can be required by the EPA or voluntarily initiated by the proponent). The EPA also has the option of conducting an assessment via an 'inquiry'. EPA guidelines state that an assessment by inquiry can be used:

...when a traditional environmental assessment approach will not produce the best assessment outcome for an action. For example, due to cultural or language issues prohibiting potentially impacted communities to easily engage in a paper-based environmental impact assessment approach. For some actions the NT EPA may decide that an assessment by inquiry methodology is used for just one element of the action coupled with another assessment methodology for the remainder of the action...

SRK considers it possible that the NT EPA would elect to assess at least some elements of the environmental impact assessment of future mining at Jabiluka by inquiry, although it would be more usual to assess the project via an EIS. Completion of EPA administrative processes for assessment via an EIS could be expected to take a minimum of approximately 10 to 12 months, but allowing for regulator requests for additional information, could take 18 months. This does not include the time required for:

- pre-referral consultation with regulators or others
- technical studies in support of the EIS
- preparation of the EIS (and revision of the EIS/preparation of an EIS supplementary report)
- stakeholder consultation
- any litigation potentially arising in relation to the minister's decision to grant or refuse an approval
- delays occasioned by project changes arising in the course of the assessment.

Although the Environment Protection Act makes provision for assessment of amended proposals and the Jabiluka Project was assessed via an EIS in 1997, current EIS evidentiary and process requirements are significantly more exacting than those that applied at the time of the earlier assessment. It can be assumed that any future impact assessment would take at least as long as the assessment time for a new significant project. In broad terms, the time that might be required for baseline technical studies (depending upon the terms of reference agreed with the EPA) could be expected to be in the order of 2 years (minimum).

The subsequent (and in some instances concurrent) preparation of EIS documentation is also likely to take in the order of 18 months to 2 years. Taken together, the time required to conduct baseline studies, prepare an EIS (or equivalent) report and complete EPA administrative processes culminating in a ministerial decision is likely to be at least 5 to 6 years.

Secondary approvals (operating licences) would follow sequentially from NT and Commonwealth environmental impact assessments and could be expected to take in the order of 12 months to 18

months to complete, although a certain amount of the preparation work for subordinate applications could be done concurrently with the primary environmental approvals.

4.3 Growth opportunity – Jabiluka

4.3.1 Project geological setting

Two uranium deposits have previously been defined at Jabiluka, known as Jabiluka I and Jabiluka II. Jabiluka II has been the focus for exploration and development studies.

The Jabiluka I and II deposits are contained within an east–west folded sequence of Lower Proterozoic sandstones of the Cahill Formation. The Cahill Formation dips to the south from near horizontal to near vertical below the unconformity in the deposit area. Jabiluka II is entirely concealed below 20 m to 200 m of the overlying Kombolgie Formation.

In detail, the local stratigraphic sequence has a series of eight quartz-chlorite-sericite-graphite units. The mineralisation at Jabiluka I is entirely confined to a single unit within the Cahill Formation, the Main Mine sequence, while at Jabiluka II around 70% of the known mineralisation occurs within the same horizon which remains open at depth and along strike. Mineralisation is also found within the overlying ‘upper graphite sequence’ and in the LMS1 and LMS2 units, which are separated from one another by barren bands.

Jabiluka II remains open at depth to the south and east and extends over at least 1 km by 400 m.

Structural setting

The Jabiluka deposits occur in folded metasediments flanking the northeast part of the Nanambu Complex. They are localised in an asymmetric flexure, dipping south and striking east-southeast. The flexure is an asymmetric syncline-anticline feature with a general southerly dip.

Mineralisation

The main mineralisation is uraninite, with minor coffinite, brannerite and organo-uranium minerals. It occurs in three main forms: i) in breccias, ii) in veins adjacent to the breccias and iii) as fine grained disseminations in schistose host rocks. It occurs with accessory sulfides and gold in the northwest portion of Jabiluka II. The gold is mainly hosted in breccia zones of the Main Mine series in mineralisation averaging 2 m thick.

The uranium mineralisation is interpreted to be related to the flow of a granitoid derived hydrothermal fluid co-genetic with pegmatite intrusions, which was controlled by a linked network of brittle extensional faults. The system is interpreted to have developed in response to post-orogenic collapse, after the end of regional thrust faulting.

4.3.2 Mineral Resources

As outlined on pages 77 and 78 of ERA's 2024 Annual Report (released to the ASX on 26 March 2025), ERA will no longer report Mineral Resources for Jabiluka MLN1. As noted therewithin:

In line with the requirements of the JORC Code (2012), ERA has assessed the reasonable prospects for eventual economic extraction (RPEEE) for Jabiluka. Due to the non-renewal decision of the associated lease - currently subject to legal proceedings - , the Mirarr people's publicly stated opposition to further mining and the operation of ERA's Long Term Care and Maintenance Agreement, the Competent Person has determined that Jabiluka no longer meets the criteria for reporting as a Mineral Resource. As a result, the Company will no longer include Jabiluka in its reported Mineral Resources. ERA will continue to monitor developments, including the outcome of legal proceedings, and will reassess if there are any material changes in circumstances.

While the Competent Person considered it realistic at the time that all or part of the Mineral Resources may eventually be reclassified as Proven or Probable Reserves, this outcome is not guaranteed. It depends on further technical and economic studies, as well as future economic conditions. The information in this announcement that relates to Jabiluka Mineral Resources is based on information compiled by geologist Stephen Pevely who is a part-time consultant of ERA. Stephen Pevely is a member of the Australasian Institute of Mining and Metallurgy and has sufficient experience that is relevant to the style of mineralisation, type of deposit under consideration and activity being undertaken to qualify as a Competent Person as defined in the JORC 2012 code. Stephen Pevely, who is a part time consultant of ERA, consents to the inclusion in this announcement of the matters based on their information in the form and context in which it appears.

Importantly, ERA's decision to no longer report Mineral Resources at Jabiluka brings its position into alignment with that of Rio Tinto. Rio Tinto has not reported a Mineral Resource for the Jabiluka II deposit since its 2021 Annual Report. Based on disclosures at page 305 of Rio Tinto's 2022 Annual Report, Rio Tinto consider *"that the deposit does not have reasonable prospects of eventual economic extraction, as required by the JORC Code for reporting of a Mineral Resource, given the Mirarr people's publicly stated opposition to further mining and the operation of ERA's Long Term Care and Maintenance Agreement, Rio Tinto has therefore decided to no longer report a Mineral Resource for Jabiluka"*.

Historical estimates

There have been three previous Mineral Resource estimates (MRE) at Jabiluka II as summarised in Table 4.1, Table 4.2 and Table 4.3.

The change in the 2000 MRE compared to the 1997 estimate was the reduction in the proportion of combined Measured and Indicated Resources from 87% to 53%. This was attributed to the lower level of mineralisation continuity demonstrated by the underground drilling and mapping studies after the decline and cross-cut were completed.

Table 4.1: Jabiluka II historical Mineral Resource, 1997

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured	17.5	0.55	96,300
Indicated	10.3	0.50	51,300
Inferred	4.6	0.49	22,300
Total	32.4	0.53	169,900

Source: ERA (2022) – ERA Jabiluka II Competent Persons Report 2021.pdf

Table 4.2: Jabiluka II historical Mineral Resource, 2000

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured	6.8	0.67	45,500
Indicated	7.4	0.51	37,800
Inferred	15.0	0.49	73,200
Total	29.2	0.54	156,500*

Source: ERA (2022) – ERA Jabiluka II Competent Persons Report 2021.pdf

Notes: *equivalent to approximately 345.0 Mlb U₃O₈.

ERA's most recent Mineral Resource was outlined in its 2023 Annual Report (ERA's ASX announcement dated 12 March 2024) as presented in Table 4.3. This estimate was first prepared with an effective date of 31 December 2021 and remained current until 31 December 2024. The entire Mineral Resource is in the fresh (unweathered) rocks. The estimate was originally generated in 2007.

Table 4.3: Jabiluka II Mineral Resource as at 31 December 2021

Classification	Tonnes (Mt)	Grade (% U ₃ O ₈)	Contained metal (t U ₃ O ₈)
Measured	1.21	0.89	10,800
Indicated	13.88	0.52	72,200
Inferred	10.00	0.54	54,000
Total	25.10	0.55	137,100*

Source: ASX:ERA (28 February 2022), confirmed February 2025 from dataroom (file named 'Jabiluka II Resource Model.pdf', Issued 15 February 2022, page 12 of 299, first paragraph)

Notes:

*equivalent to approximately 302.3 Mlb U₃O₈

Cut-off grade 0.2% U₃O₈

The overall dry bulk density for the Mineral Resource is 2.64 t/m³

The Competent Person for the Jabiluka II Mineral Resource is Mr Stephen Pevely, MAusIMM, part-time employee of ERA.

For the purposes of this valuation exercise, SRK discussed ERA's previous Jabiluka II Mineral Resource estimate with the Competent Person for Mineral Resources, Mr Stephen Pevely, on 16 January 2025. At the time, Mr Pevely was a part-time consultant with ERA and met the

requirements for acting as a Competent Person under the definitions provided in the JORC Code (2012). SRK noted the following facts during the meeting:

- The only reportable Mineral Resource that ERA owns is that associated with the Jabiluka II deposit.
- Jabiluka II is located on NT Mineral Lease, MLN1.
- ERA lodged a renewal application for MLN1 on 20 March 2024, which was ahead of the statutory expiry date of 11 August 2024.
- ERA was notified by the NT Government on 26 July 2024 that MLN1 would not be renewed on advice from the Commonwealth Government.
- Despite having now passed the original expiry date, MLN1 has not been extinguished; but rather remains in a state of legal status quo pursuant to Court orders.
- There is a Court hearing regarding the validity of the NT Minister's decision to not renew MLN1 scheduled for the second week of May 2025, with a decision to be published after this date following Court deliberations.
- In preparation for ERA's 2024 Annual Report and as the stated Competent Person for the Jabiluka II Mineral Resource, Mr Peveley had been contemplating the potential impact to the previously stated Jabiluka Mineral Resource in light of:
 - Proposed changes to the JORC Code (which is currently envisaged to be implemented in late 2025), particularly in reference to increased environmental, social and governance disclosures and their influence on the declaration and classification of Mineral Resources and Ore Reserves.
 - On-going uncertainty regarding the renewal status of MLN1.
 - The requirement for Traditional Owner consent to be granted to enable any future development or mining.
 - Traditional Owner's continued strong opposition to any future development of Jabiluka.
 - Rio Tinto's decision to no longer report a Mineral Resource at Jabiluka deposit (with Mineral Resources last reported by Rio Tinto at Jabiluka on pages 374 and 375 of its 2021 Annual Report), as it does not consider the deposit offers *reasonable prospects of eventual economic extraction in light of Traditional Owner opposition and the terms of the LTCMA*.
 - recent public announcements by the Commonwealth Government with respect to incorporation of Jabiluka into the Kakadu National Park.
- While Mr Peveley had formed some preliminary views with respect to his position, these remained to be discussed and agreed with ERA management and ultimately approved by the ERA Board, prior to any public disclosure.

SRK comments

Risks

The social licence to operate and environmental approvals have long represented the most significant risk to Jabiluka. At question remains the determination of whether Jabiluka is able to demonstrate RPEEE, with reasonable being defined as *more likely than not*.

The Competent Person has concluded that Jabiluka no longer meets the RPEEE standard in light of:

- material uncertainty regarding the Jabiluka tenure given:
 - the Northern Territory Government's decision to decline, based on advice from the Commonwealth Government, the renewal of the Jabiluka MLN1 in July 2024
 - ERA's ongoing legal challenge to this decision in the Federal Court, with the Court issuing an interim order staying the decision pending further proceedings in August 2024.
- the timing of a final resolution of these proceedings
- commitments made by ERA and Rio Tinto not to commence development of Jabiluka without Traditional Owner consent under the 2005 LTCMA
- continued, longstanding and intergenerational opposition to the future development of Jabiluka by Traditional Owners.

Also of note is:

- ERA's decision to fully impair value of the Jabiluka Mineral Lease in its financial accounts
- increased scrutiny of ESG matters by regulators, investors and other stakeholders, and
- proposed amendments to prevailing, longstanding industry codes (i.e. JORC Code) effectively embedding greater disclosure of ESG matters.

SRK interprets ERA's decision to no longer report Mineral Resources to imply that while the Jabiluka II deposit contains known high-grade uranium (which can be estimated in part with significant confidence), there is significant uncertainty regarding a viable development pathway for this mineralisation given all the constraints listed above. This inability to reasonably define a path and timeframe toward development represents the most significant hurdle in Jabiluka being able to demonstrate RPEEE.

Opportunities

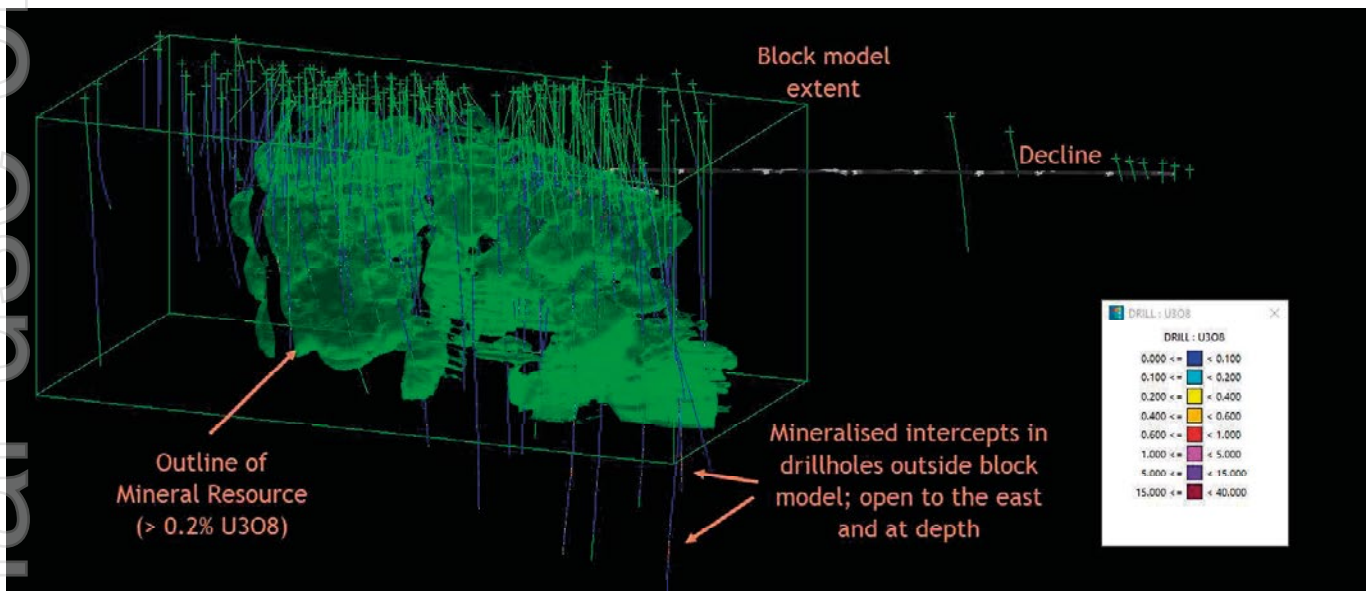
The former Jabiluka II Mineral Resource remained open at depth and to the east. Upon resolution of the development issues outlined above, further exploration efforts may expand the defined mineralised zone and lead to a larger Mineral Resource, however it is not possible to reasonably quantify this increase in the absence of further drill data.

The gold estimate for Jabiluka II has not been included in the previously defined Mineral Resources due to concerns with assay QAQC. Further work to assess the gold assays may result in the inclusion of the gold, or gold and palladium, should RPEEE be determined.

Exploration potential

The Jabiluka II deposit offers further potential to increase the previously defined estimate for uranium, as it remains open at depth and to the east. Previous drilling at depth has demonstrated that uranium mineralisation is present below the former Mineral Resource area (Figure 4.2).

Figure 4.1: Jabiluka II exploration potential



Notes: All development has been backfilled and a bulkhead installed at the unconformity between the Kombolgie and Cahill formations to prevent aquifer mixing.

All references to the Mineral Resource refer to the 2021 Mineral Resource, which is no longer in effect. Since December 2024, ERA no longer reports any Mineral Resources at Jabiluka.

SRK notes the gold mineralisation at Jabiluka II also offers further exploration potential above that attributable to the uranium alone.

Outside of the former Jabiluka Mineral Resource areas, the broader tenement MLN1, contains a further six target areas as outlined in the 2011 OoM study, namely:

- East of Jabiluka II
- Jabiluka III
- Jabiluka I
- Hades Flat
- Granite Hill
- Valley Area.

These are discussed in greater detail below and their locations are shown in Figure 4.2.

East of Jabiluka II

At the eastern end of the former Jabiluka II resource area, the host sequence and mineralisation dip increasingly steeply to the east. Surface drilling has been limited in this area because of hole

depth and thus cost. From the available aeromagnetic geophysical data, it is interpreted that the strike of the prospective host sequence swings from east–west to north–south to the east of Jabiluka II. This area has not been investigated and requires additional drill testing with approximately 9 km of prospective stratigraphy interpreted to be present.

The area is covered by Quaternary transported sands and as such, does not have a surface radiometric response evident in the historical geophysical data. Blocks of Kombolgie Sandstone may also underlie the Quaternary cover, which would also cover the prospective Cahill sequence. A 1997 airborne radiometric geophysical survey noted elevated potassium, however the significance is unknown.

Jabiluka III

Mineralisation has been identified in previous drilling approximately 300 m down-dip from Jabiluka I. The prospect is located on the edge of the Magela floodplain and ERA reports that only one drill hole has been completed in this location with no further testing due to the environmentally sensitive setting.

Jabiluka I

The original discovery of uranium mineralisation within MLN1 was at Jabiluka I. The area was explored based on the results from airborne radiometric geophysical surveys. Jabiluka I is described as a small, shallow uranium occurrence. A historical Mineral Resource has previously been declared at Jabiluka I, being 1.3 Mt at 0.25% U_3O_8 and containing 3,400 t of U_3O_8 . SRK has not been provided with this historical Mineral Resource report and does not know any details relating to this estimate, including the version of the JORC Code it was reported under. However, SRK notes that ERA does not currently report this Mineral Resource. The deposit is located proximal to the Oenpelli Road and the Magela floodplain, and is subject to inundation during the wet season.

Hades Flat

The Hades Flat area was explored between 1971 and 1976. ERA notes there is a historical 'reserve' delineated within narrow lenses at Hades Flat. ERA also states that knowledge gained regarding the RPA deposit geology has not been applied at Hades Flat, hence this target remains underexplored and offers potential for deeper, structurally controlled mineralisation. The northern end of the Hades Flat prospect was drilled for sterilisation purposes for a proposed tailings dam (at the time) with negative results for uranium mineralisation. From aeromagnetic geophysical survey data, it is interpreted that the strike of the prospective Cahill Formation east of Jabiluka II swings from east–west to north–south towards Hades Flat.

Granite Hill

ERA notes that this target is represented by a surface radiometric geophysical anomaly due to a slightly radioactive granite/gneiss. No uranium mineralisation is present, however it was noted to be valuable as a source of aggregate for construction purposes.

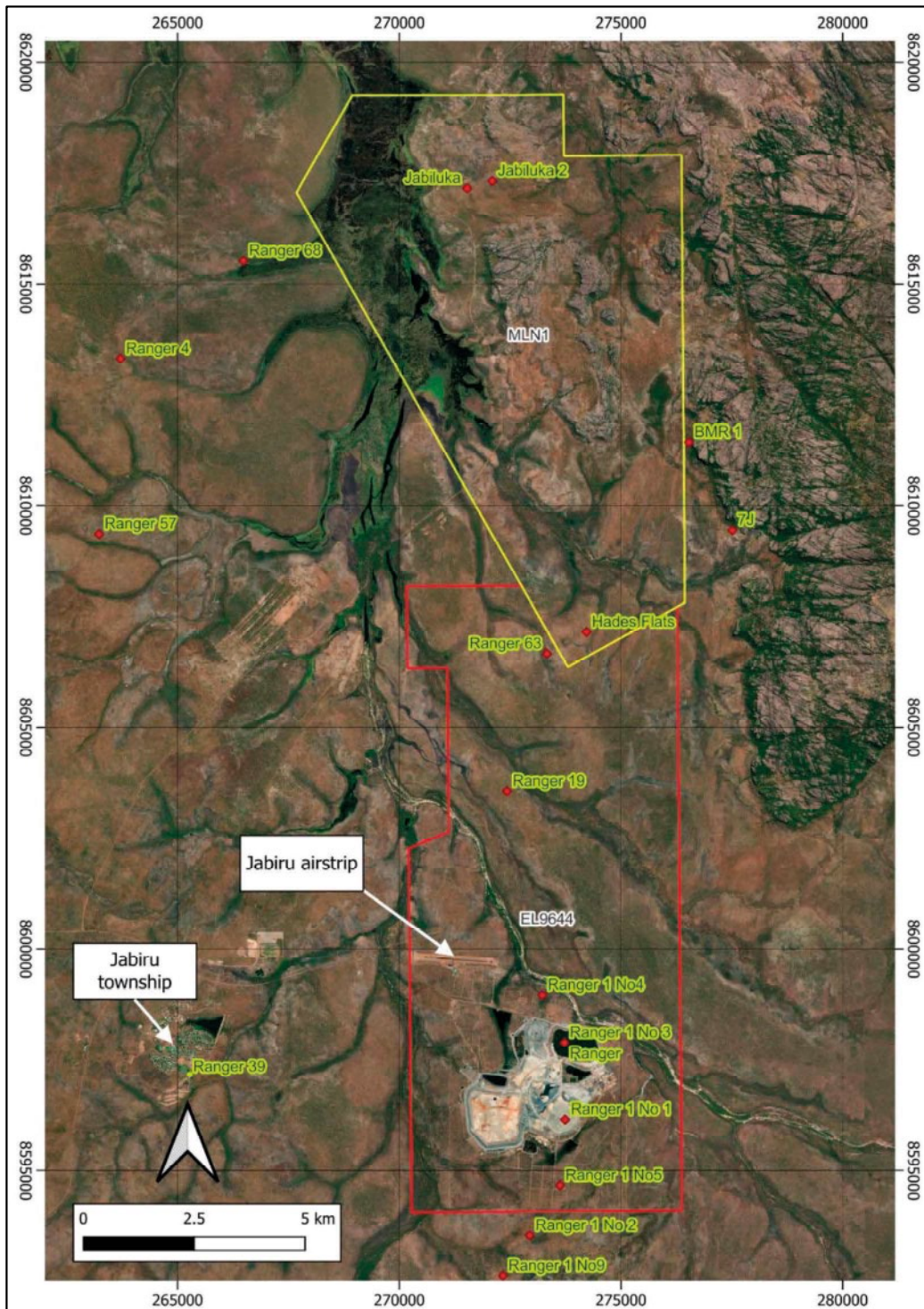
Valley Area

Five historical percussion holes have previously been drilled into the Valley Area, which is reportedly northeast of Jabiluka II. One of the percussion holes intersected the Kombolgie Sandstone, with the total thickness of Quaternary sediments and Kombolgie Sandstone cover being 100 m to 200 m thick.

ERA advised SRK that no recent exploration work has been conducted within MLN1, and also notes the exploration potential remains high as there has been no systematic exploration efforts east of the Jabiluka II deposit and north of Hades Flat, which hosts the favourable Cahill Formation.

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Figure 4.2: Mineral occurrences within MLN1 and the RPA



Source: SRK, Northern Territory Geological Survey (STRIKE database)

Notes: Map projection is GDA94, zone 53

4.3.3 Mining

Previous studies

A number of studies were previously completed to investigate the potential development of the Jabiluka project over a period of almost 20 years. The initial FS was completed in 1993 and envisaged the development of an underground mine with haulage of the ore to Ranger for processing and tailings disposal. A subsequent JMA study was completed in 1998 and considered processing of the ore at Jabiluka with a new mill, and storage of the tailings to occur underground and in two surface pits.

The original FS was then reviewed and updated in 2000 to reflect information gained from the development of the exploration decline, and new resource drilling. The resource model and mine design were updated as part of this review. The mine design update included reducing the sub-level spacing underground and shortening the stope lengths. The proposed mined ore production rate was in the order of 1.0 Mtpa.

A series of studies were then completed by Rio Tinto between 2003 and 2007. As part of these studies, the dilution and mining recovery parameters were adjusted, and the production rate increased to 1.2 Mtpa. In 2006, AMC Consultants Pty Ltd (AMC) completed a mining review and update of the mine design to incorporate underground storage of tailings. The capital and operating cost estimates were also updated to a PFS study standard, and in 2007 an Ore Reserve for the Jabiluka Project was estimated in accordance with the JORC Code (2004).

In 2011, an OoM study, known as Project Eagle, was completed which investigated several alternative options for the potential development of the Jabiluka II deposit using the previously completed studies as a basis. Options were identified to be progressed for further analysis in subsequent studies. In the mining discipline, the OoM study investigated options for aspects such as the mining rate, cut-off grade, portal location, mining method, ventilation and materials handling.

The 2011 OoM study and very limited sections of the studies completed between 2003 and 2007 were provided to SRK for review. This report is based on the information provided. In some cases, more detailed information may exist in relation to the mining aspects of the Jabiluka Project, such as the updated study in 2000 and the studies completed between 2003 and 2007, however these studies were not provided to inform this report.

Overview of proposed mining operation

The most recent study (i.e. the 2011 OoM study) assumed underground mining using an open stoping mining method incorporating backfill of the stopes with cemented paste fill. This study investigated three production rate options, namely 1.2 Mtpa, 1.6 Mtpa and 2.0 Mtpa. The study also investigated three cut-off grades of 0.45% U_3O_8 , 0.2% U_3O_8 and 0.1% U_3O_8 .

Under this study, access to the Jabiluka II orebody was planned to be via a conventional decline with four options considered for the decline portal location.

Mining method

The previously proposed mining method for the Jabiluka II orebody in both the 2011 OoM study and previous studies was sub-level longhole open stoping, with backfill.

Longhole open stoping with backfill was selected as the overall preferred option as it was considered to best meet the unique requirements at Jabiluka II. These requirements include:

- no surface subsidence and limited impact on the surface
- variable dip and thickness of the Jabiluka II mineralisation
- a largely no-entry mining method that minimises the exposure of the workforce to radiation
- the ability to store tailings underground as backfill.

The proposed longhole open stoping mining method incorporated a level spacing of 25 m and stope widths of 12 m that were considered appropriate for the relatively foliated schist rock mass hosting the known uranium mineralisation.

Several variations of the sub-level longhole open stoping method were developed to suit the varying dip and dimensions at Jabiluka II with two of these shown in Figure 4.3 and Figure 4.4.

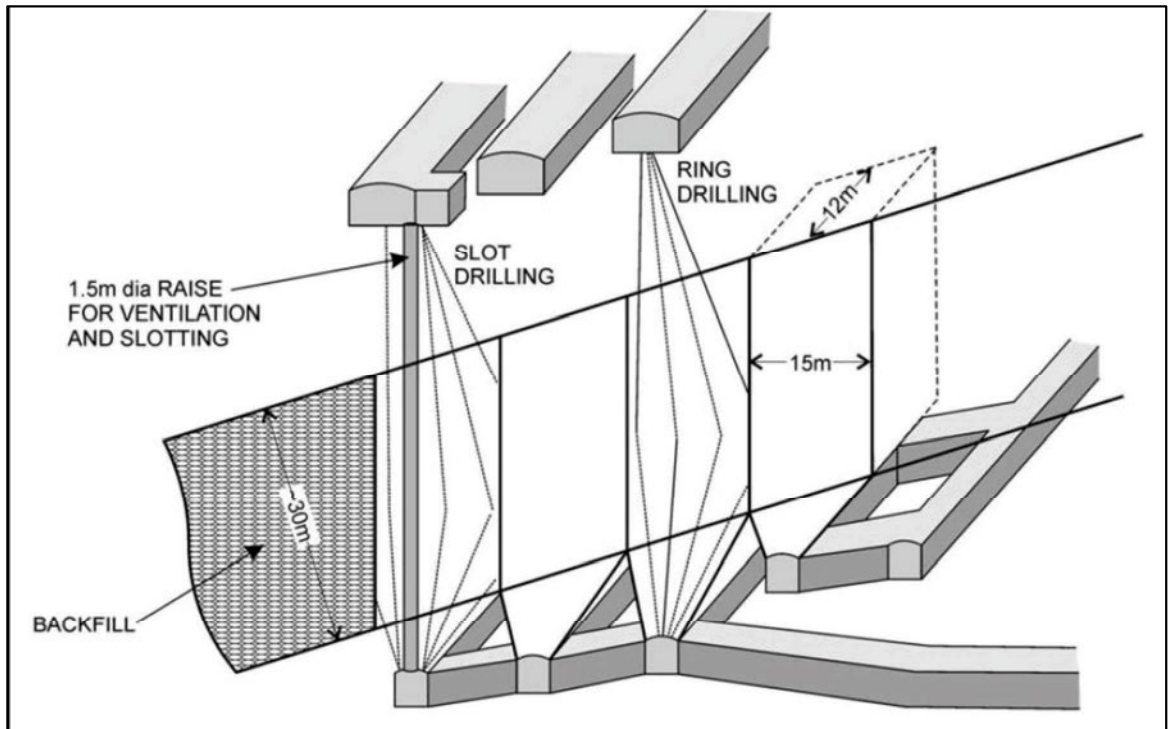
A key feature of the proposed stoping layouts was the location of the drilling and bogging development outside the high-grade ore zones and the use of the ventilation raise at the top of each stope to place the stope under negative ventilation pressure and prevent the build-up of radiation inside the stope.

SRK considers the planned sub-level longhole stoping method to be appropriate for the Jabiluka II orebody and the unique requirements for mining the deposit. The mining method and stoping layouts developed and reviewed over numerous studies are considered to be relatively well developed and at a PFS level. In addition, the mining method selection and stoping layout were informed by experience from the development of the exploration decline, where the rock mass conditions in both the ore and waste were exposed.

A series of cut-off grades were used in the 2011 OoM study to generate various planning scenarios. The cut-off grades used were 0.1%, 0.2% and 0.45% U_3O_8 . The 0.2% U_3O_8 grade is described, at times, as the preferred cut-off grade.

Work completed in earlier studies (AMC, 2007b) identified that the cut-off grade is highly sensitive to the metal price, especially below US\$25/lb U_3O_8 . SRK considers the 0.2% U_3O_8 cut-off grade to be reasonable based on the estimated costs, metallurgical recoveries and forecast metal prices at the time of reporting, however further optimisation should be completed to determine the optimal cut-off grade under current conditions.

Figure 4.3: Stopping layout for flat dipping ore zones



Source: AMC (2007a) – Mining Review

In the 2011 OoM study, the stope external dilution factor was assumed at 7% based on estimates of overbreak in the hanging wall and footwall of between 1 m and 3 m. In addition to hanging wall and footwall dilution, an allowance was included for dilution from the backfill that regularly forms some of the stope side walls. The dilution allowance for backfill assumed at 0.5 m of backfill dilution for each exposed backfill face.

A mining recovery factor of 89% was applied to the diamond and longhole stopes, while a factor of 95% was applied to the panel stopes. These factors represent an appropriate change from previous studies, where a factor of 95% was used for mining recovery in all stopes.

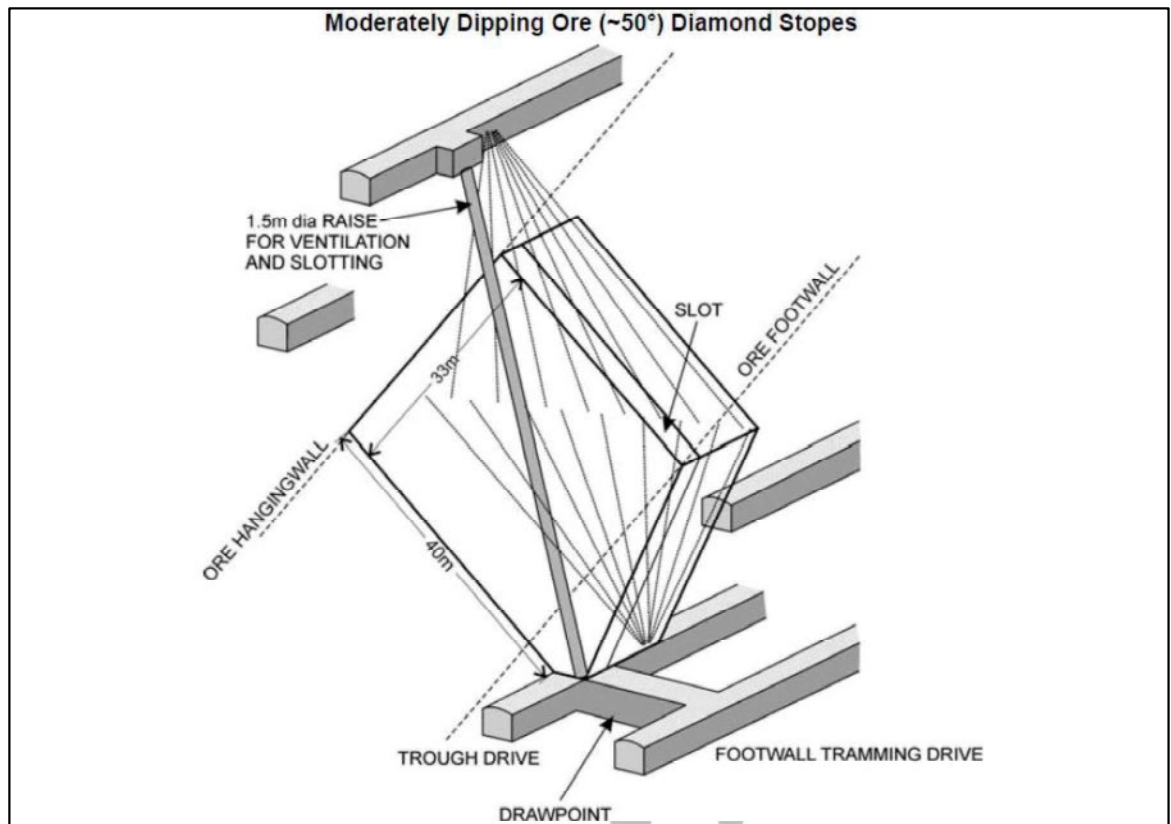
SRK considers the dilution and mining recovery factors used in the 2011 OoM study to be reasonable and appropriate for the planned stopping method and rock mass conditions.

Geotechnical inputs

Limited information was available regarding the geotechnical conditions expected, the data collected and work completed to inform the mine plan and design. The provided information indicates that an *in situ* stress measurement and numerical modelling had not been completed at Jabiluka II. Although the planned mining is relatively shallow, *in situ* stress measurements and numerical modelling of the planned mining sequence are now considered part of a comprehensive PFS study and the lack of these in the 2011 OoM study indicates that this aspect of the technical work is not at a PFS standard.

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Figure 4.4: Stopping layout for moderately dipping ore zones



Source: AMC (2007a) – Mining Review

Mine access and material handling

Previous studies assumed access to the Jabiluka II deposit would be via a decline with a portal located to the east of the deposit, where the exploration decline had previously been constructed. SRK understands that this site is no longer considered viable due to the culturally sensitive nature of this area. From a purely technical and cost basis, this location represents the most cost-effective location to access the Jabiluka II deposit.

As part of the 2011 OoM study, several access and processing location options were investigated to allow access to the orebody and for transportation of the mined ore and waste from the mine. The four access options were:

- Option 1, Raven tunnel – a 23 km tunnel from the Ranger mine with two portals
- Option 2, Heron decline – a direct decline path from the Heron area to the Jabiluka deposit passing beneath the Australian Heritage Commission (AHC) restricted area
- Option 3, alternative Heron decline – a variation of the Heron decline with the decline path modified to skirt the eastern edge of the AHC area
- Option 4, alternative Jackdaw decline – an alternative to the previous Jabiluka decline with a portal further east, so as not to disturb the Jabiluka site.

The various access options are shown in Figure 4.5. The Heron decline option (Option 2) and the alternative Jackdaw decline (Option 4) were not progressed, due to cultural sensitivity issues. However, work progressed on Option 1, the tunnel from Ranger, and Option 3, the alternative decline from the Heron area.

For each of these two remaining options, various material handling options were investigated for the transportation of the ore from a potential Jabiluka mine to Ranger. The materials handling options investigated were:

- Truck haulage. This option involved the transport of the broken ore and waste to the surface using underground haulage trucks or road train type trucks. This option may require a dedicated haulage decline parallel to the access decline for the management of radon gas emitted from the ore.
- Conveyor haulage. In this option, the ore and waste rock were to be crushed underground and then transported from the mine on a conveyor in a dedicated conveyor decline drive.
- Slurry pumping. In this option, the ore was to be reduced in size underground using crushing and/or grinding processes and then pumped from the mine as a slurry.

The Option 3 access option – a portal located at the Heron area and the use of twin declines with conveyor haulage – was discussed in the 2011 OoM study as an initially preferred option, however the report also discussed that the other options needed to be further investigated.

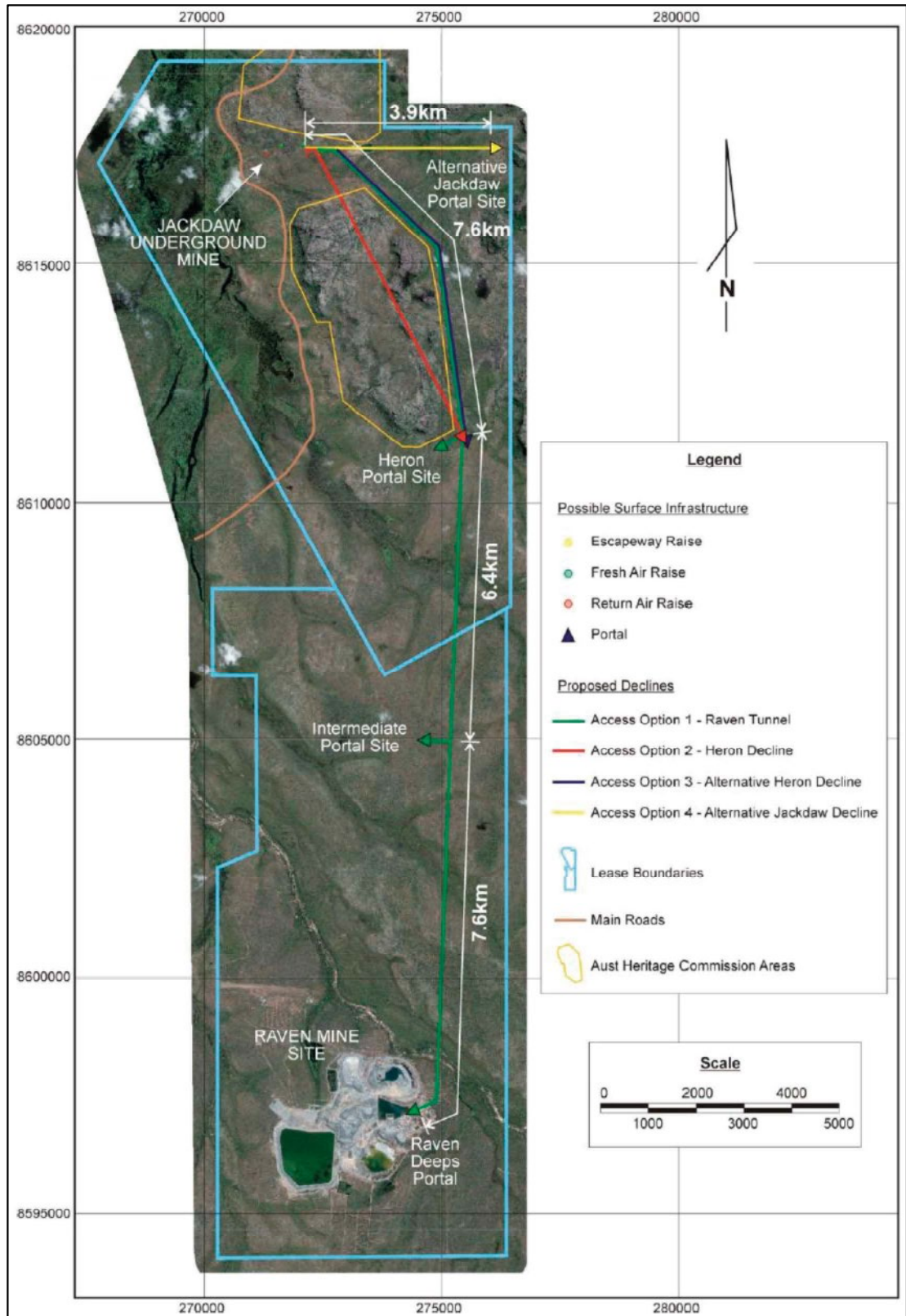
SRK considers that all the options proposed are potentially feasible, however the level of technical work completed on the access and material handling options remains at a relatively preliminary stage and has not reached the level of a PFS. From the provided information, it appears that the geotechnical conditions along the proposed access decline and tunnels were not investigated. The geotechnical assessment is an important aspect that needs to be completed before the access option can be finalised.

Since the completion of the OoM study in 2011 the use of remote access methods, such as long tunnels to access mineral deposits for underground mining in environmentally sensitive areas, has become more common in the mining industry. The successful results and experience gained from the use of these remote access methods increases the confidence that the access methods proposed in the OoM study could be successfully implemented.

The use of truck haulage with a twin decline access arrangement may offer advantages over the conveyor haulage option as underground crushing infrastructure will not be required. SRK considers there may be limited ventilation and radiation management advantages to using a conveyor, as opposed to underground truck haulage.

The use of slurry pumping from underground to a processing plant located in a less culturally sensitive area is considered by SRK to offer many advantages for project advancement and represents an opportunity for further investigation. Slurry pumping technology has progressed significantly over the last 20 years and is now commonly used to pump ore and mineral concentrate for tens and hundreds of kilometres. If this option was progressed, it is likely to require an underground comminution facility that reduces the ore to a particle size of several millimetres and an underground pumping facility using high pressure slurry pumps.

Figure 4.5: Mine access options



Source: ERA (2011) – Project Eagle OoM Study

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Ventilation

The ventilation of any potential Jabiluka underground mine presents several specific challenges due to the relatively high U_3O_8 grade of the ore and the requirement to maintain workforce exposure levels of radiation below specified levels. The mine is also located in a tropical climate and heat management will be an issue requiring careful consideration to ensure a safe working environment without excessive temperatures.

Several stages of ventilation planning for the Jabiluka deposit were completed, including the 2007 AMC study and the 2011 OoM study. The specific hazards related to radiation at Jabiluka include exposure to gamma radiation, inhalation of radioactive dust, alpha radiation and inhalation of radon and decay products.

The mine planning work completed to date, and particularly the ventilation design, was developed with a strong focus on managing the hazards associated with radiation exposure. The residence time of the airflow in the mine after exposure to uranium mineralisation was limited to 10 minutes. This was designed to prevent the growth of radon decay products in the airflow. This was to be achieved by the location of relatively closely spaced intake and exhaust shafts throughout the mineralised area, in order to limit the distance that the air must travel following contact with exposed radioactive mineralisation.

The mining method in high-grade areas was designed using a non-entry mining method that largely eliminates development in, and contact with, high-grade ores and hence reduces the exposure of the workforce to gamma radiation emanating from the ore. A high volume of airflow was also planned to ventilate the mine (approximately 2,000 m^3/s) to ensure relatively high airflow velocities in the mine working areas. Cooling of the intake airflow was also planned to ensure acceptable temperature conditions throughout the underground mine.

SRK considers that the technical work completed to plan and manage the hazards associated with radiation and heat exposure in the proposed Jabiluka underground mine is appropriate and generally consistent with good practice. The ventilation planning work is considered to be generally at a PFS level. The ventilation plan discussed in the 2011 OoM study is considered to be relatively elaborate, and opportunity exists to simplify and improve the system by removing features such as the 'push pull' primary ventilation fan arrangement. In addition, further ventilation planning may confirm that a simpler and less capital-intensive material handling system incorporating two-way truck haulage in a twin access decline arrangement can be used. The use of battery electric loaders and trucks provides an opportunity that should also be investigated, as these will reduce the heat load applied to ventilating air and may allow for a reduced primary airflow requirement for the mine.

The risks associated with exposure to radiation are one of the major operational risks associated with the Jabiluka Project and will require detailed and thorough mine planning as well as focused management during any future operation of the mine.

Cost estimation

Operating and capital costs were estimated several times for the Jabiluka Project during previous studies. The cost estimated as part of the 2011 OoM study were provided for SRK's review. The 2011 OoM study mining operating costs were estimated using a zero based fixed and variable approach. The mining operating costs for the 2 Mtpa scenario with a cut-off grade of 0.2% U_3O_8

were estimated at A\$135/t ore (2011 basis). This mining operating cost includes a cost of A\$36/t ore (2011 basis) for the construction of underground tailings storage silos. Other significant components of the estimated mining operating costs included backfill A\$29/t ore, development A\$22/t ore, and power at A\$21/t ore (all 2011 basis).

SRK considers the estimated mining operating costs to be reasonable based on a 2011 calendar year cost base. The estimated operating costs benchmark above those for other third party held mines operating at a similar production rate and using paste fill. However, SRK considers this is understandable in light of the unique nature of the Jabiluka Project. Limited detail has been provided to SRK regarding the breakdown and detail of the 2011 estimated costs, making it difficult to comment on the accuracy of the cost estimate.

Based on the information provided in relation to the Jabiluka capital costs as at 2011, SRK considers these to have been appropriate, and potentially towards the high end of the range for comparable projects at the time. However, given the escalation in costs since 2011, SRK considers that escalation of costs to provide an updated capital cost estimate for valuation purposes is likely to provide an outcome that is merely indicative and insufficient to provide a reasonable basis for investment or valuation purposes.

Given the level of accuracy required to support an investment, SRK considers that all cost estimates at Jabiluka need to be reviewed in light of prevailing economic conditions in order to provide definitive cost estimates for valuation purposes, rather than escalating the 2011 operating and capital costs.

4.3.4 Processing

Overview of proposed processing options

The Jabiluka underground uranium deposit has a long history of metallurgical testwork and processing development. Various studies were completed, spanning back to the early 1970s. The Jabiluka deposit was extensively studied between 1975 and 2000, and early works were progressed in the late 1990s incorporating an exploration decline and supporting surface works including roads, buildings and raw water storage.

The related metallurgical testwork and engineering study documents are well summarised in the reports provided to SRK. The work completed demonstrates that the Jabiluka ores are amenable to acid leaching using pyrolusite (or equivalent) as an oxidant, as is commonly practiced, with high uranium extractions in the mid to high nineties (+90%) at ambient temperatures and with moderate acid consumption.

Studies at both Jabiluka and R3D consistently engaged competent and reputable metallurgical laboratories, consultants and engineers specialising in uranium processing. As such, there is a high degree of confidence in the historical testwork that has been undertaken. Examples include the Australian Nuclear Science and Technology Organisation (ANSTO) previously the AAEC, Warman Laboratories, Amdel, Bureau Veritas Minerals, Rio Tinto's Bundoora Technical Development Centre, ERA Technical Services, North Ltd Technical Services, CSIRO, GRD Minproc Ltd, AMEC Minproc Ltd and Ausenco Ltd.

In the past, this work has been considered to be sufficient to support the definition of Mineral Resource and Ore Reserve estimates, but this is no longer the case as ERA no longer reports either Ore Reserves or Mineral Resources (since December 2024). The bulk of the testwork, flowsheet development and engineering design and costings supporting the Jabiluka Project are now dated, with limited additional processing related investigations completed over the last two decades. Supporting data, including that for the uranium recovery assumption of 94.0% U_3O_8 , no longer meets the JORC Code (2012) requirements for the deposit to be classified as having an Ore Reserve. Previous Ore Reserve estimates have been in the order of 11.8 Mt of feed at 0.50% U_3O_8 . This would be considered a high-grade uranium deposit, with adequate tonnage and contained metal to support a standalone processing facility.

A base case processing option for the Jabiluka Project is not currently defined. The obvious option was treatment through the Ranger facility, located approximately 23 km from the Jabiluka site. Over its operating history, Ranger has successfully processed a range of uranium feed types including fresh ores comparable to those potentially able to be mined at Jabiluka. The Ranger processing plant was the logical treatment option for the Jabiluka Project and represented the base case processing scenario, described as the RMA. The RMA processing option is no longer available due to the ongoing rehabilitation of the Ranger site.

Various studies and a number of processing options have been considered for the Jabiluka deposit over many years. The most relevant study relates to the 2007 OoM study and an updated 2010 engineering estimate. The alternative processing solutions at the time included the potential locations of the treatment sites, including the use of the existing nearby Ranger Mill (the original assumption), or a greenfield plant to be located at the Jabiluka site (known as the JMA). Studies have also considered various downstream flowsheet options available to a new plant including the use of SX, ion exchange or a less conventional direct/bulk precipitation from solution (but all adopting a common standard comminution and acid leaching technology approach). A range of throughput rates were also assessed, most relevantly targeting production at 1.2 Mtpa and 2.0 Mtpa, each assuming a metallurgical recovery of 96.0% U_3O_8 , despite previous resource modelling assuming a 94.0% U_3O_8 recovery.

The 2010 study ultimately recommended the use of the existing Ranger plant, or a greenfield direct precipitation plant. This options assessment showed the RMA option offered significantly superior project economics when compared to a greenfield plant. In SRK's opinion, neither the direct precipitation flowsheet – which was considered to avoid the production of a sodium sulfate by-product and to eliminate the use of SX and use of ammonia on site – or the SX and strong acid strip and peroxide precipitation flowsheet options were adequately demonstrated to allow them to be considered as an alternative base case flowsheet option. Both of these options also incur higher uranium losses, that were not incorporated into the associated modelling.

Supporting testwork for a processing solution is reliant on historical testwork. Little further testing has been completed in the last 20 years, in part due to the limited availability of samples. Design work is therefore largely reliant on the historical work now dating back several decades. While an oxidative acid leach demonstrated the Jabiluka deposit is amenable to acid leaching, with extractions in the mid to high nineties (+90%) and no risks highlighted, other aspects of the flowsheet have not been as well developed. For example, the testwork relating to direct precipitation was not conclusive, did not generate a saleable concentrate in the lower grade feed composite tests and downstream testing was not extensive. Ultimately, this work is not at the level expected of a PFS, particularly if a new dedicated processing facility is required.

Testwork was not limited to acidic tank leaching, it also included the assessment of alkaline atmospheric and pressure leaching, acid heap leaching, in situ leaching and separate investigations into the recovery of associated gold from the leach tailings (associated with the uraninite and pyrite). These options were not progressed further. The obstacles to the alkaline leach and heap leaching options are numerous, but include lower uranium recoveries of approximately 78% and 75%, respectively for each of these options and the large footprint required for heap leaching. Gold recovery was precluded due to the perceived risk of transporting sodium cyanide through the Kakadu National Park and the use of sodium cyanide, the conventional lixiviant for gold extraction for gold ores, adjacent to the Kakadu National Park.

In more recent years, the Jabiluka Project assumed a base case of site-based treatment. Consideration was given to locate the plant or at least part of the plant underground in purpose-built cavities, or to truck or pipe slurry ores to several potential remote processing facilities to minimise surface disturbance in order to assist with Project approvals. It is important to understand the distinction between minimising the surface disturbance, as it could never eliminate it altogether.

The most recent study, and that most relevant to the ISR, is the Project Eagle study issued in April 2011. This study was undertaken at a conceptual level and was described as being at an OoM level of confidence. That report describes the required action needed as part of the next level of study (i.e. it highlights that the study had not been developed sufficiently to meet the requirements of a PFS level of confidence).

By way of example, the 2011 study identified the following activities to bring the metallurgical testwork and processing aspects of the Jabiluka Project to a PFS level of confidence.

Processing: To assess each of the three proposed flow sheets (SX-ADU, SX-strong acid and direct precipitation) to a PFS standard, further test work is required. Particularly, given its novel nature, direct precipitation will require extensive testwork to demonstrate its applicability, and further, the marketability of the direct precipitation product will need to be verified. A number of engineering studies will be required as part of the PFS including: leach optimisation, filtration, flowsheet options, product recovery optimisation, greenfield or brownfield development options including plant location, power station integration and optimisation, ore throughput, infrastructure optimisation including use of the existing (Ranger) infrastructure, beneficiation, a remote operations centre and gold recovery. A continuation of the modelling initiated in the OoM study will be necessary to support the process design efforts in the PFS. (ERA, 2011).

Given the age of this last substantive study (i.e. 2011), further work would now also be required beyond that outlined in the previous statement.

Although the development options are not sufficiently defined, the highest degree of confidence at this stage of study would be to adopt the same metallurgical flowsheet as Ranger, but potentially exclude radiometric sorting, due to the high grade and the Jabiluka Project's financial sensitivity to uranium recoveries. This flowsheet includes two stage crushing, semi-autogenous grind (SAG) milling, acid leach under ambient oxidative conditions, neutralisation, filtration or CCD settling of the leach discharge, SX, ammonium sulfate stripping, ammonium diuranate precipitation, dewatering and calcination to produce a U₃O₈ product, with tailings dewatered in pressure plate

and frame filters, neutralised and returned to the underground mine. This would be supported by associated process infrastructure including a dedicated sulfuric acid plant.

SRK has undertaken a high-level review of the processing capital and operating inputs and unit costs used in the supplied financial model titled *Project Eagle Jackdaw Model Jun 2022.xlsx*. This model selects the 2.0 Mtpa case located underground at the Jabiluka site, with an SX, acid strip and peroxide precipitation downstream flowsheet, with filtered and neutralised tailings stored in silos located underground. SRK considers a number of inputs into this model to be insufficiently developed (i.e. to a PFS level of confidence or outdated). As a result, the financial outcomes are not sufficiently supported for use in a JORC (2012) Code and VALMIN (2015) Code compliant project technical assessment or valuation.

The basis of this model is from the 2011 update of a 2007 OoM study, which in turn has its origins in a flowsheet and mechanical equipment list derived in circa 2000. At the time, the modelling provided relative values across the 19 different processing options. In SRK's opinion, the likely deficiencies include, but are not limited to, the capital cost, insufficient contingency allowance, owner's cost, lack of owner's accuracy provision, base and total salaries, head count, sulfur cost, diesel cost (and associated power cost), insufficient freight, maintenance, contract maintenance, reagents and other costs. Another potential deficiency in the financial modelling is the metallurgical recovery assumption of 96.0% U₃O₈. This is based on leach extractions on a high-grade sample (not the average LOM grade) of 97% and allowing for 1% soluble losses. In SRK's opinion, this is not supported by the available testwork, sample representivity or the proposed base case downstream flowsheet of SX, strong acid strip and peroxide precipitation.

In SRK's opinion, from a metallurgical testwork and processing perspective, no material processing risks have been identified that would prevent the treatment of feed from this deposit. There is a high degree of confidence that the Jabiluka deposit ores would be amenable to treatment through conventional uranium processing flowsheets. This view is informed by historical testing of samples from this project and the similarities between Jabiluka and the Ranger deposit and the associated metallurgical behaviours of their ores.

However, in SRK's opinion, the Jabiluka Project has not been developed to the required level of confidence to allow it to be considered at a PFS level. The reasons for this opinion include those listed below. As a result, the processing aspects of the Jabiluka Project do not yet meet the requirements of the VALMIN Code that would allow the project valuation to be based on a DCF basis. An alternative valuation approach is required at this time.

- Testwork and engineering development has not been progressed to a PFS level of confidence. The flowsheet is based on studies dating back to 2000 and considered direct precipitation and other flowsheet variations. The flowsheet remains to be finalised and testwork is dated and while valuable, is now inadequate.
- A definitive processing flowsheet for the Jabiluka deposit has not been selected, although three general options have been considered. More metallurgical testing is required once the base case flowsheet has been finalised.
- The location of the processing plant has not been finalised, for example whether it is on the Jabiluka site or partly or fully offsite, i.e. the trucking or slurry pumping option to a remote greenfield processing location, nominally 178 km or 50 km away.

- The base case capacity has not been finalised. Several feed rate scenarios have been considered, 1.2 Mtpa, 2.0 Mtpa or even 1.0 Mtpa of feed. The lower feed rate is more closely related with the underground plant option, due to the reduced plant footprint requirements.
- If processing were undertaken on site, and whether it would be constructed partly or fully underground, or located on surface. Either way, some surface facilities would be required.
- The technical complexities of constructing and operating the underground processing option have not been substantially developed. While there are peer comparisons, such as partial processing of ore to slurry phase at Cameco's Cigar Lake underground operation as part of its 'jet boring' mining method, it has not been considered in sufficient detail at Jabiluka. The technique is relatively novel and in SRK's opinion, only part, not all of a potential processing plant could reasonably be located underground, with large footprint areas such as the CCD or filters, water storage tanks and dams, brine concentrator, and even the SX, precipitation, calcination and product containerisation, as well as loadout, all being on the surface.
- A viable infrastructure option has not been scoped and costed in sufficient detail, i.e. to PFS level. Some of the previous infrastructure assumptions would also need to be reconsidered, such as the approach to power generation, which previously assumed diesel fired generators with the ability to convert to natural gas, i.e. dual fuel reciprocating engines).
- The positive water balance, and need to treat and dispose of, or manage, excess water was always a challenge during the processing of the Ranger deposit. The same challenge would be experienced during any future treatment of Jabiluka underground ores. This has not been sufficiently resolved technically and requires a higher level of technical confidence, even at a PFS level, given the sensitivity of the project to environmental, Traditional Owners, social and political aspects.
- The operating cost estimates for processing, and associated processing and non-processing infrastructure, were undertaken with a claimed accuracy of $\pm 30\%$ adopting a base date of Q4 2010, and are no longer current. In SRK's opinion, even with in-built escalation factors, these estimates cannot be confidently relied upon for a publicly reported DCF style assessment as presented in *Project Eagle Jackdaw Model Jun 2022.xlsx*.
- The capital cost estimates for processing, and associated processing and non-processing infrastructure were last undertaken with a base date of Q4 2010 and are no longer current, nor relevant. In SRK's opinion, even with in-built escalation factors, these estimates cannot be confidently relied on for a publicly reported DCF style assessment as presented in *Project Eagle Jackdaw Model Jun 2022.xlsx*.
- The metallurgical recoveries were/are potentially modestly overstated in *Project Eagle Jackdaw Model Jun 2022.xlsx*.
- These findings are also reflected in the decision to downgrade the Jabiluka Ore Reserves back to a resource estimate only in 2015. This downgrade was a result of the 2007 Ore Reserve estimate (as prepared by AMC) no longer conforming to Clause 29 of the JORC Code (2012).

Future processing technologies

Any future development of the Jabiluka underground deposit may benefit from a processing option that results in less surface disruption. Existing technologies offering this advantage – specifically in situ leaching (ISL) which is a long-established treatment option for many operations – do not

currently appear amenable to this application at Jabiluka due to the deposit geology, host mineralogy, permeability, hydrology and hydrogeology, U₃O₈ grade and the likely closure groundwater remediation requirements.

While the generic uranium processing flowsheet has remained largely unchanged for many years, SRK acknowledges that future, as yet undefined, advancements in uranium technologies may provide alternative treatment options resulting in a smaller surface footprint, or offer other advantages that could potentially support the development of the Jabiluka asset from a processing perspective.

Gold processing

SRK notes that historically, consideration has been made during several studies for the recovery of gold from zones of elevated grade contained in the Jabiluka deposit, but the work has never been significantly advanced. Even though a gold recovery option was incorporated into the 1993 Jackdaw (Jabiluka) FS, the level of confidence in the metallurgical testwork and engineering was not at this level. Historical studies generally assessed the gold project as a standalone opportunity that would be selectively mined and separately treated. More recent studies have been more focused on an integrated uranium and gold processing facility option.

Any gold related testwork that has been done is now dated and engineering studies are not current or meaningfully progressed. The 'sighter level' testwork campaigns from 1975, 1992 and 1993 are now circa 30 to 50 years old, and the level these were completed to at the time was not extensive. Given the early standalone gold project approach, SRK does not consider the samples tested to be representative of an integrated uranium and gold processing facility.

The testing that was done was modest. Gravity testwork was limited and dates back to 1975, on a high-grade sample of 61 g/t Au, around 24 times the indicative deposit grade. The indicative gravity recovery assumption of 20% based on this testwork is therefore not supported and likely to be materially overstated. Subsequent studies actually reported the gold to be finely disseminated with the uranium particles and not amenable to gravity concentration. There is a refractory component to some of the gold lithology types as well as the presence of preg-robbing minerals.

Compounding this, the project approvals acquired in 1997 to bring the Jabiluka deposit into production specifically excluded the recovery of gold. The following extract is from the 1997 Environment Australia, Environmental Assessment Report, Proposal to Extract, Process and Export Uranium from Alpha Orebody No.2: The Alpha Proposal:

In 1997 the environmental assessment branch of Environment Australia released a report on the Alpha proposal. The proposal encompassed underground mining at Alpha, followed by trucking ore to the Raven operation for treatment. Tailings produced from the process would be disposed of in the Raven's existing open cut pits.

In regard to material processing, Environment Australia made one recommendation. This stated that 'approval for the Alpha proposal, and export of uranium only be given on the condition that the proposal does not include the extraction of gold, and that if it is proposed to extract gold, further assessment under the environmental protection act would be required.

Ultimately, a gold treatment facility was not adopted in the Jabiluka Project at that time and continues to be specifically excluded from the base case modelling. During the earlier studies, the

commercial evaluation was not compelling, demonstrating the gold project being marginal, albeit during a period of particularly low gold prices. In the 2011 OoM study, the lack of definition of an integrated processing facility, and the perceived risk of transporting cyanide through the Kakadu National Park resulted in this option again being eliminated, unless processing was undertaken at a remote facility.

The genesis of the technical development of the gold prospects of Jabiluka are well summarised in the 2010 technical memorandum titled 'Confidential – Eagle gold processing options' issued in November 2010 as part of the Q1 2011 OoM (options) study for the Jabiluka Project. It describes the historical testwork completed and the processing options available as gold recovery was contemplated as one of the project options.

In SRK's opinion, there are several technical areas that require resolution, prior to any commercial consideration, i.e. the capital and operating cost estimation. These include, but are not limited to, whether or not it would be integrated with a uranium processing facility, whether gold recovery would be before or after uranium acid leaching, where the plant would be located, i.e. on-site or remotely, what flowsheet would be selected, i.e. gravity only, or a gravity and cyanide leach circuit, whether or not it is decided if cyanide can be safely transported through the Kakadu National Park, what plant throughput would be selected, or whether treatment is deferred and the tailings are reprocessed at another time.

- There are some complexities with the gold hosted minerals and associations with uranium minerals. There are several styles of gold hosting mineralisation, some closely associated with the uranium mineralisation. These include fine inclusions in pitchblende, as veinlets with and without tellurides, occurring in pyrite microfractures or finely associated with massive uraninite and accompanied by tellurides. References to potentially refractory minerals, the presence of pre-robbing carbonaceous and graphite minerals, and fine gold particle sizes all highlight some of the likely processing challenges with the Jabiluka underground deposit.
- Previous studies have considered the gold project to be commercially marginal as an integrated gold/uranium plant. In the context of the location, the modest gold grades (for an underground deposit), the need for underground mining, approvals and other expected challenges, the project is even more unlikely to stand alone as a gold project.
- Furthermore, the gold flowsheet benefits from the integration with a uranium project as the acidic leach also serves to remove uranium and pre-condition the refractory gold component of the minerals such as pyrite hosted gold. The acid leach also partly addresses potential pregnant liquor robbing carbonaceous, graphitic material. The alternative option is to undertake significantly finer grinding, accept a lower gold recovery and manage the higher uranium associated with the gold doré. Gold leaching before uranium acid leaching results in a lower gold recovery of nominally 6% (in absolute terms) due to the semi-refractory nature of some of the ores.
- There are several technical issues that need to be resolved including the need to neutralise the uranium leach discharge and then precipitate and filter out the neutralisation products before cyanide leaching. The precipitation of gypsum and other metal hydroxide products would otherwise coat the gold hosted minerals and inhibit leaching and contaminate/foul the activated carbon used for the adsorption of gold from solution. Elevated levels of uranium and other radionuclides in the gravity concentrate and/or final gold sludge/gold doré would also need to be managed, likely requiring some acid leaching of these products, and separating the cyanide

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circuit from the acid leach circuit to eliminate the potential for poisonous hydrogen cyanide gas generation are just some that will be encountered.

- Whether there could be reconsideration of using cyanide at the Jabiluka site, which would entail transporting cyanide through the Kakadu National Park, and using cyanide adjacent to Kakadu, otherwise the gold processing circuit would almost certainly have to be located remotely.
- There are no current or accurate capital or operating costs for the gold processing options. Even the 2011 OoM study costs were benchmarked by AMEC Minproc from other plants, not built from first principles, and therefore cannot be relied on for cashflow type modelling.
- Flowsheets not incorporating cyanide such as gravity only and flotation will also concentrate lead (210Pb) and polonium (210Po) that will have to be managed with additional concentrate acid leaching. SRK does not consider either of these alternative flowsheet options likely to recover sufficient gold to justify this processing option. The installation of a gravity gold recovery circuit at Olympic Dam was not particularly successful. A conventional gold processing circuit is not considered a problem as radionuclides are not mobilised in an alkaline circuit, i.e. at the high pH environment of a cyanide leach circuit. Any residual radionuclides in the acid leach would precipitate in the pH adjustment process and be filtered out and removed.

It is noted that there are platinum group elements (PGEs) also associated with the Jabiluka deposit. Insufficient definition of the PGEs, metallurgical testwork or processing development has been undertaken to determine the amenability of these to potential recovery, but it is not unreasonable to assume some could be recovered through conventional flowsheets. For example, it is expected that some of the other precious metals would report to a gravity product and that cyanide leaching would also recover part of any PGE content. Alternative, novel hydrometallurgical flowsheets exist that specifically target PGEs.

In SRK's opinion, from a technical perspective, the limited work done, while highlighting several potential challenges relating to gold processing, has not identified any fatal flaws. The testwork does support the potential recovery of gold from the Jabiluka underground deposit at acceptable levels, but almost certainly not exclusively using gravity, i.e. it would also need to incorporate cyanide leaching. For this reason, notwithstanding other potential non-processing related obstacles to a gold project, valuation of the gold project cannot be eliminated based on reasonable prospects of processing ability. However, insufficient work has been undertaken to support the likely gold recoveries, capital and operating costs, and other key inputs that would be needed for any type of cash flow modelling.

4.3.5 Infrastructure

There is currently no installed infrastructure at the Jabiluka site.

As with the proposed processing facility, the associated above-ground processing and non-process infrastructure at Jabiluka have historically been considered and costed at a conceptual level, for the range of processing scenarios considered, including processing operations located at Jabiluka either above or below ground, at the existing Ranger site, or at one of a number of remote greenfield locations. These 19 options and associated engineering and costings, based on the 2011 OoM study, were at a conceptual level of assessment.

Several of these options are now obsolete, such as processing at Ranger, which has been decommissioned and is to be fully rehabilitated back to its natural state. The infrastructure at Ranger that was available as part of that treatment option at the time of the 2011 OoM study will now be removed, and any future consideration will only be for a greenfield site, requiring new infrastructure to be constructed. Other options such as the remote sites, are not adequately demarcated.

In SRK's opinion it is not possible to adopt a DCF analysis for Jabiluka. Given there is no defined treatment option for the Jabiluka Project, limited engineering design advanced only to a conceptual level (i.e. not to a PFS level of confidence), and dated costs for the options historically considered, and insufficient information relating to the required infrastructure, including roads, water supply and storage, power supply and site reticulation, administration buildings, IT and communications, warehouse and maintenance facilities, diesel storage, and security.

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5 Cooper Creek Joint Venture

5.1 Overview

ERA is party to the Cooper Creek JV agreement with Cameco Australia Pty Ltd (Cameco) and Sutton Motors Pty Ltd (Sutton) (the JV Agreement).

The JV relates to two EL applications (ELA23311 and ELA23312) covering 810.24 km² centred on Mount Borradaile and outside of the Kakadu National Park (the Applications). The Applications are situated approximately 65 km northwest of the RPA in northwest Arnhem Land. The tenements are located entirely within Aboriginal freehold land held by the Arnhem Land Aboriginal Land Trust.

The Cooper Creek JV Project is centred at approximately Latitude 12°05'43.65' S and Longitude 132°49'42.54' E, on the Alligator River (SD5301) 1: 250,000 scale and East Alligator (5473), 1:100,000 scale topographic sheets.

These tenures lie immediately adjacent to, and west of Deep Yellow Limited's (Deep Yellow) Alligator River Project, which was acquired through the merger with Vimy Resources Limited and completed in August 2022. The Alligator River Project was previously acquired from Cameco via an earn-in agreement in March 2018, before moving to a 100% interest in 2021.

The tenures may be accessed from Jabiru by the Gabalanya – Maningrida Road to Gabalanya and then via the Airstrip Access and Mount Borradaile roads.

Topography is a combination of inland wetlands, billabongs, and swampy areas grading towards the sandstone plateau surrounding the Wellington Range and Algado Inlier to the east. Low lying areas consist almost entirely of gently undulating savannah woodland. Soils consist of thin sandy types and black loams covering in part the sandstone plateau country. Several drainages are evident including Cooper Creek and other tributaries of the East Alligator River system.

5.1.1 Joint venture terms

Under the terms of the JV Agreement, each party holds a beneficial interest in the Applications, and upon their grant, each party will hold the following interests: ERA 50%, Cameco 40% and Sutton 10%.

Before the NT Department of Mines and Energy (DME) is able to consider approval of the Applications, a number of preconditions must be satisfied, including obtaining the consent of the Traditional Owners for the grant of the ELs.

In October 2015, representatives of Cameco held an on-country meeting with Traditional Owners who declined to provide this consent. The NLC formally advised the DME of this in November 2015 and the Applications were returned to moratorium for a period of 5 years. That period ended on 15 November 2020 with Cameco subsequently lodging a further application on behalf of the JV on 10 December 2020.

As at the Valuation Date, the Applications remained in moratorium.

5.2 Project geological setting

Historically, the surrounding region to the project tenures has been widely explored for unconformity-related uranium deposits. Companies involved in regional exploration efforts include Union Carbide Exploration Corporation (1970–96), Cameco/Stockdale Prospecting (1996–2004, Cameco (2004–18) and Rio Tinto Exploration (2018–21). Historical exploration activities include regional airborne radiometric and aeromagnetic geophysical surveys, project scale mapping, minor rock chip geochemical sampling, rotary air blast drilling, reverse circulation drilling and DD.

There are no known mineral occurrences within the Cooper Creek JV Project, and it appears there has been little exploration conducted by ERA or the JV partners (including desktop analysis) given the tenures remain in application and in moratorium. The Cooper Creek tenures are an exploration concept only.

The concept is that permissive host rocks lie under cover within the tenements, however there is no direct evidence that this is the case. Although the prospective Cahill stratigraphy (or its equivalent) as evident within the RPA is not exposed, it is interpreted to continue through the application area based on analysis and interpretation of historical aeromagnetic geophysical data.

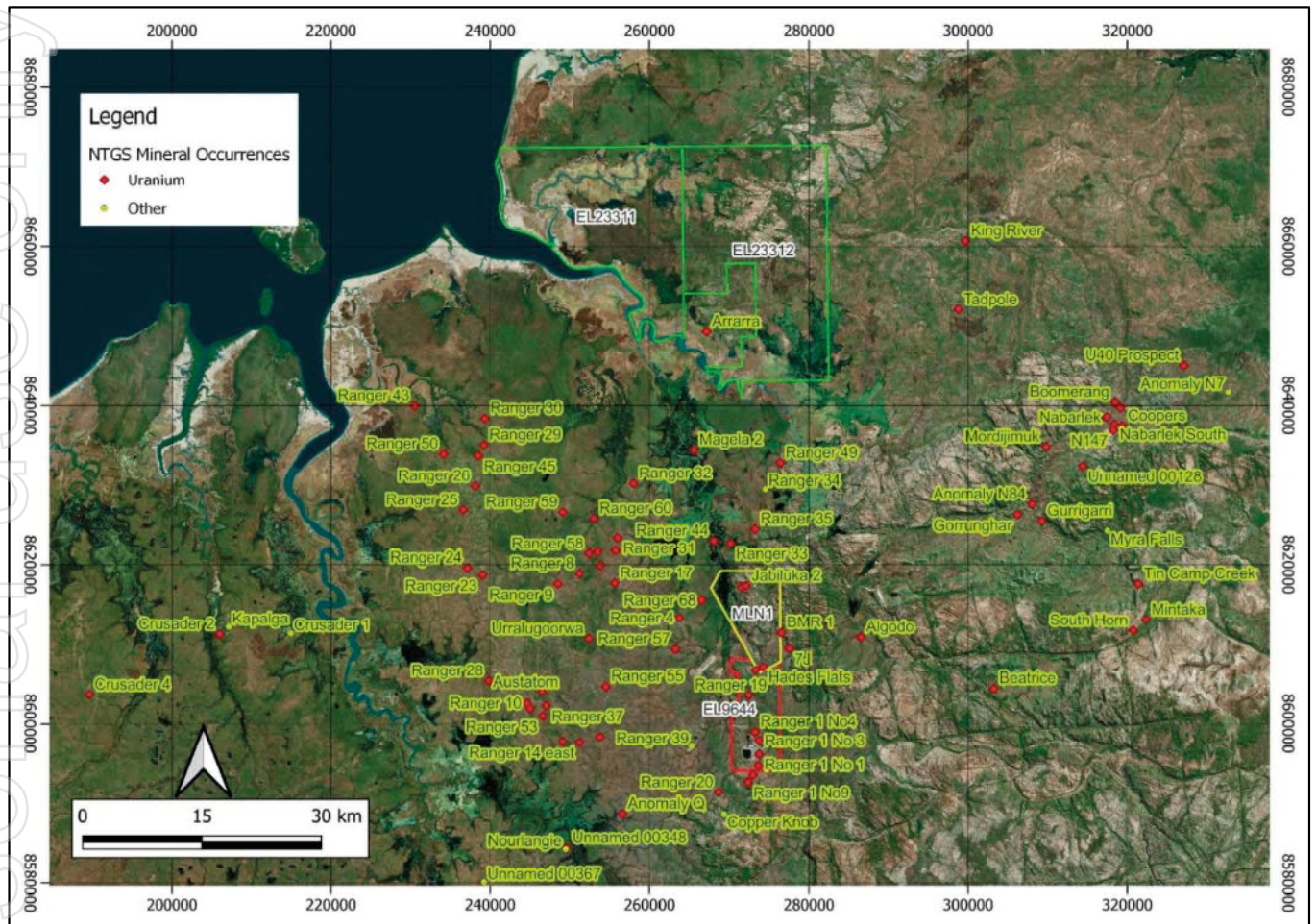
The exploration concept at Cooper Creek is based on the same geological setting and exploration concepts as for Ranger and Jabiluka, which seek to identify concentrations of unconformity-related uranium deposits hosted in the Cahill Formation carbonaceous schists. The coincidence of deep structures with the host lithologies is a controlling feature of these local uranium deposits, therefore the ideal targets have:

- permissive lithology (Cahill Formation)
- structural complexity
- if close to surface, a radiometric anomaly indicating the presence of elevated levels of uranium.

5.2.1 Existing radiometric anomalies

Based on previous airborne radiometric geophysical surveys, with the first conducted in 1969, numerous radiometric targets have been identified over the broader region surrounding the ERA tenures (Figure 5.1).

Figure 5.1: Mineral occurrences in the ERA exploration tenements and surrounds



Sources: SRK, Northern Territory Geological Survey (STRIKE database)

Notes: Map projection is GDA94, zone 53

5.2.2 Deposit model

The key target within the Cooper Creek application area is for unconformity related uranium deposits, similar to those at Ranger and Jabiluka, as well as the nearby Nabarlek uranium deposit.

Several styles of unconformity related uranium deposits are recognised in the Alligator River Province including:

- high angle fault hosted deposits such as Angularli, Koongarra and Nabarlek
- the lower grade, bulk tonnage low angle shear deposits such as Ranger and Jabiluka within reactivated shear zones.

6 Other Considerations

6.1 Uranium market

Unlike most other commodities, the uranium price does not trade on an open, liquid market. Buyers and sellers typically negotiate contracts privately, so prices are published by independent market consultants. Contract pricing is most commonly on a long-term supply basis (typically between 3–15 years) among energy companies who require the long-term security of supply to justify development of new nuclear power plants, for example. Given this security, the long-term supply contracts are often priced at a premium to spot pricing.

Contract prices typically have regard to the spot price at the time of delivery and include a premium for delivery reflecting the security of supply. This premium has varied over time.

According to the Australian Government's Office of Chief Economist *Resources and Energy Quarterly* (December 2024 edition, being the most recent to the Valuation Date), many countries are seeking to expand their nuclear power capability to meet increasing energy demand and net zero climate goals, which is expected to increase long-term uranium demand. India and China remain the predominant drivers of demand from new reactors. Interest in small modular reactors (SMR) has also been increasing from industry, research and government, particularly as a low emissions pathway for large data centres. In response to rising energy demand, previously closed nuclear power plants in Japan and Canada are now being scheduled to restart. Forecasts for uranium demand in 2025 are 99 kt in 2025 and 102 kt in 2026.

On the supply side, new mines are commencing construction (i.e. Morocco's Uranex mine), projects being restarted (i.e. Malawi's Kayelekera and Australia's Honeymoon mines) and capability expansions are mooted. However, supply stability remains vulnerable to production setbacks; - as evident in Niger where political tensions have meant Orano has been unable to export uranium from site, and Kazatomprom has decreased its 2025 production target due to persistent shortages of sulfuric acid used in the extraction process. Global production in 2025 is estimated at approximately 86 kt and forecast at 88 kt in 2026.

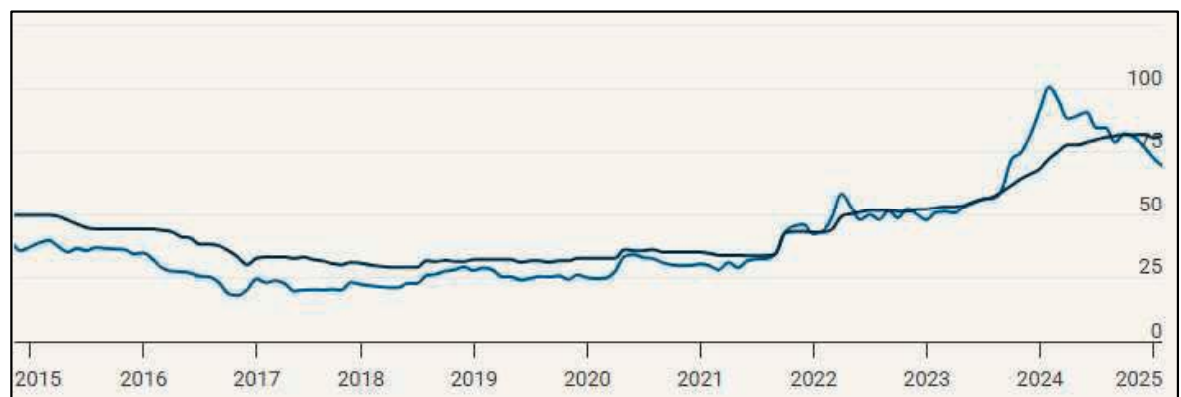
Secondary uranium supply — which includes inventory sales, enricher sales and fuel recycling — is expected to continue falling to 16 kt in 2025 from 28 kt in 2023. This can be partially attributed to a reduction in enricher sales. Due to the desire to diversify away from Russian supply, greater reliance has been placed on western uranium suppliers to meet reactor demand. With rising demand for western enrichment, major utilities such as Urenco and Orano no longer have the spare reactor capacity to undertake secondary production activities such as underfeeding. A reduction in underfeeding activities has reduced the availability of secondary uranium to the market.

Uranium prices have fallen in recent months to around US\$80 per pound (lb) down from a historical high of over US\$100/lb in early 2024 (Figure 6.1). Rising demand and supply issues are expected to push prices higher in 2025 (US\$88/lb) and 2026 ((US\$94/lb) as reactors continue to draw from established inventories to meet requirements. Consensus Economics forecasts for spot uranium prices as at December 2024 were between US\$88/lb in 2025, US\$81/lb in 2026 and 2027, US\$82/lb in 2029, with a long-term price of US\$65/lb (real).

Australia currently has three operating uranium mines all located in South Australia: Olympic Dam (underground and surface mining), Beverley-Four Mile (in situ recovery) and Honeymoon (in situ recovery). The recent re-opening and continuing ramp up of Honeymoon is expected to lift Australia's uranium export earnings to A\$1.4 billion in 2024-25 and A\$1.7 billion in 2025-26. In addition, Australia has several other projects which remain subject to ongoing development/permitting, namely: Wiluna, (WA), Mulga Rock (WA), Yeelirrie (WA) and Sapphire (SA).

Uranium exploration has increased in line with higher uranium prices with Australian uranium explorers spending A\$26.7 M in September quarter 2024 compared with A\$3.2 M in December quarter 2021, but remains below the highs of the late 2000s and early 2010s.

Figure 6.1: Uranium prices (US\$/lb) over the past 10 years



Source: Cameco.com (accessed 7 February 2025)

Note: Blue – Uranium spot price, Black – Long-term uranium price.

6.2 Previous valuations

The VALMIN Code (2015) requires that an Independent Valuation Report should refer to other recent valuations undertaken on the mineral assets being assessed.

On 26 September 2022, ERA released an IER by Grant Thornton Corporate Finance Pty Ltd (Grant Thornton) commenting on the fair value of ERA (the 2022 Grant Thornton Valuation). For the avoidance of doubt, SRK acted as the independent mining technical specialist to Grant Thornton during the preparation of the 2022 Grant Thornton Valuation.

As part of its recommendations to Grant Thornton, SRK recommended the use of the Market valuation approach, in particular the Comparable Market Transactions method to Grant Thornton as the most appropriate valuation methodology for Jabiluka, given the uncertainty in likelihood of Jabiluka producing any future cashflows given the defined resource position, level of techno-economic study completed, Traditional Owner opposition and tenure status.

As outlined in Section 5.1.2 of the 2022 Grant Thornton Valuation, Grant Thornton ultimately selected a resource multiple of A\$3.25/lb to A\$4.25/lb of U₃O₈ for its application against the defined Jabiluka Mineral Resource. This range was based on the prevailing trading multiples of listed peers (Trading Multiples) and acquisition of comparable companies prepared by SRK for transactions at a project level which Grant Thornton integrated with transactions at a corporate level (Transaction Multiples). Application of these multiples to the Jabiluka Mineral Resource (302 Mlb of U₃O₈)

resulted in an implied value of between A\$982 M and A\$1,284 M with a midpoint value of A\$1,133 M.

Following the release of the 2022 Grant Thornton Valuation, Rio Tinto provided strong public comment around its views on ERA's value and particularly the value attributable to Jabiluka. These comments indicated strong support for the Traditional Owner views and opposition to any consideration of developments against the wishes of the Traditional Owners. ERA remains of a similar view that no development of Jabiluka will be made without the consent of Traditional Owners.

Having asked the relevant questions of ERA and Rio Tinto representatives, SRK is not aware of any other previous independent valuations (either public or private) relating to the mineral assets that are the subject of this report.

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7 Valuation

The objective of this section is to assist LEA with its determination of the market value of ERA's mineral assets. In doing so, SRK has focused on the mineral assets held by ERA at Ranger, Jabiluka and Cooper Creek. SRK has not attempted to value ERA, this being the corporate entity which is the beneficial owner of the mineral assets considered in this report.

LEA has issued SRK with the following instruction:

In light of the change made by ERA to no longer recognise a Mineral Resource for MLN1, can you please provide:

- a) *An unencumbered value of MLN1 – in particular, unencumbered by the Renewal Decision and Traditional Owner consent, and thus prior to the change to no longer recognise a Mineral Resource for MLN1*
- b) *An “as is” opinion on the value of MLN1, reflecting encumbrances arising from the Renewal Decision and position of the Traditional Owners and, if considered appropriate, the circumstance that ERA no longer recognises a Mineral Resource for MLN1.*

In assessing the technical aspects relevant to this valuation exercise, SRK has relied on information provided by ERA, as well as information sourced from the public domain, SRK's internal databases and SRK's subscription databases.

In determining the appropriate parameters for valuation, SRK has considered the assessments that might be made by a willing, knowledgeable and prudent buyer in assessing the value of the projects and the associated tenure.

The opinions expressed and conclusions drawn are appropriate at the Valuation Date of 28 February 2025. The valuation may change with time in response to variations in economic, market, legal or political conditions in addition to the receipt of new exploration information.

7.1 Valuation approaches

While the VALMIN Code (2015) states that the selection of the valuation approach and methodology is the responsibility of the practitioner, where possible, SRK considers a number of methods.

The aim of this approach is to compare the results achieved using different methods to select a preferred value within a valuation range. This reflects the uncertainty in the data and interaction of the various assumptions inherent in the valuation.

The VALMIN Code (2015) outlines three generally accepted valuation approaches:

1. Market Approach
2. Income Approach
3. Cost Approach.

The Market Approach is based primarily on the principle of substitution and is also called the Sales Comparison Approach. The mineral asset being valued is compared with the transaction value of similar mineral assets under similar time and circumstance on an open market (VALMIN Code, 2015). Methods include precedent transactions, metal transaction ratio and option or Farm-in Agreement terms analysis.

The Income Approach is based on the principle of anticipation of economic benefits and includes all methods that are based on the anticipated benefits of the potential income or cashflow generation of the mineral asset (VALMIN Code, 2015). Valuation methods that follow this approach include DCF modelling, Capitalised Earnings, Option Pricing and Probabilistic methods.

The Cost Approach is based on the principle of cost contribution to value, with the costs incurred providing the basis of analysis (VALMIN Code, 2015). Methods include the appraised value method and multiples of exploration expenditure (MEE), where expenditures are analysed for their contribution to the exploration potential of the mineral asset.

The applicability of the various valuation approaches and methods vary depending on the stage of exploration or development of the mineral asset, and hence the amount and quality of the information available on the mineral potential of the assets.

Table 7.1 presents the various valuation approaches for the valuation of mineral assets at the various stages of exploration and development.

Table 7.1: VALMIN – valuation approaches according to development status

Valuation approach	Exploration projects	Pre-development projects	Development projects	Production projects
Market	Yes	Yes	Yes	Yes
Income	No	In some cases	Yes	Yes
Cost	Yes	In some cases	No	No

Source: VALMIN Code (2015)

The market-based approach to valuation is generally accepted as the most suitable approach for valuation of projects at all stages of development.

An income-based method such as a DCF model is commonly adopted for assessing the value of a tenure containing a deposit where an Ore Reserve has been reported following an appropriate level of technical study and to accepted technical guidelines such as the JORC Code (2012). However, an income-based method is not considered an appropriate method for deposits or mineral tenure that are less advanced, i.e. where there is no declared Ore Reserve or supporting mining and related technical studies.

The use of cost-based methods, such as considering suitable MEE, is best suited to exploration properties, i.e. prior to the estimation of Mineral Resources. Within the valuation hierarchy, cost-based methods of valuation are considered less suitable than market-based methods of valuation.

In general, these methods are accepted analytical valuation approaches that are in common use for determining Market Value (defined below) of Mineral Assets, using market-derived data.

The 'Market Value' is defined in the VALMIN Code (2015) as, in respect of a Mineral Asset, the *'estimated amount of money (or the cash equivalent of some other consideration) for which the*

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Mineral Asset should exchange on the date of Valuation between a willing buyer and a willing seller in an arm's length transaction after appropriate marketing wherein the parties each acted knowledgeably, prudently and without compulsion'. The term Market Value has the same intended meaning and context as the International Valuation Standards Council (IVSC) term of the same name. This has the same meaning as Fair Value in RG111. In the 2005 edition of the VALMIN Code this was known as Fair Market Value.

The 'Technical Value' is defined in the VALMIN Code (2015) as '*an assessment of a Mineral Asset's future net economic benefit at the Valuation Date under a set of assumptions deemed most appropriate by a Practitioner, excluding any premium or discount to account for market considerations*'. The term 'Technical Value' has an intended meaning that is similar to the IVSC term 'Investment Value'.

In summary, the various recognised valuation methods are designed to provide an estimate of the mineral asset or property value in each of the various categories of development. In some instances, a particular Mineral Asset or property or project may comprise assets that logically fall under more than one of the previously discussed development categories.

7.2 Valuation basis

In estimating the value of the projects as at the Valuation Date, SRK has considered various valuation methods within the context of the VALMIN Code (2015).

The valuation method applied depends on the relative maturity of assessment for each asset, as well as the amount of available data supporting the project. For this valuation, the mineral assets were classified according to the development stage categories as per the VALMIN Code (2015):

- **Early Stage Exploration Projects** – Tenure holdings where mineralisation may or may not have been identified, but where Mineral Resources have not been identified.
- **Advanced Exploration Projects** – Tenure holdings where considerable exploration has been undertaken and specific targets have been identified that warrant further detailed evaluation, usually by drill testing, trenching or some other form of detailed geological sampling. A Mineral Resource estimate may or may not have been made, but sufficient work will have been undertaken on at least one prospect to provide both a good understanding of the type of mineralisation present and encouragement that further work will elevate one or more of the prospects to the Mineral Resources category.
- **Pre-development Projects** – Tenure holdings where Mineral Resources have been identified and their extent estimated (possibly incompletely) but where a decision to proceed with development has not been made. Properties at the early assessment stage, properties for which a decision has been made not to proceed with development, properties on care and maintenance, and properties held on retention titles are included in this category if Mineral Resources have been identified, even if no further work is being undertaken.
- **Development Projects** – Tenure holdings for which a decision has been made to proceed with construction or production or both, but which are not yet commissioned or operating at design levels. Economic viability of Development Projects will be proven by at least a PFS.
- **Production Projects** – Tenure holdings – particularly mines, wellfields and processing plants that have been commissioned and are in production.

SRK's valuation basis is presented in Table 7.2.

Table 7.2: Adopted valuation basis for ERA's projects

Asset	Development stage	Description	Valuation basis
Ranger Project	Mine Closure	Rehabilitation and closure cost	NA – recommended modifications to LEA
		Exploration Target	Market: NA
Jabiluka Project	Advanced Exploration*	Mineral Resource	Market: Precedent transactions
		Exploration Potential	Market: Peer Trading Multiples
Cooper Creek	Early-stage Exploration	Exploration Potential	Market: Precedent transactions Cost: Geoscientific rating

Source: SRK analysis (2025)

Notes: NA – not applicable.

*downgraded from pre-development to reflect ERA's recent decision to no longer report Mineral Resources.

7.3 SRK's valuation technique

In estimating the value of the mineral assets held by ERA as at the Valuation Date, SRK has considered various valuation methods within the context of the VALMIN Code (2015).

Under sections 670A(2), 728(2) and 769C of the *Corporations Act 2001* and section 12BB(1) of the *ASIC Act 2001*, any statement about future matters within a public report must be based on reasonable grounds as at the date the statement is made, or it will be considered to be misleading.

For mining or exploration companies, income-based valuations are forward-looking statements as they comprise, or are based on, statements about future matters including projections of likely ore tonnages, grades, and metallurgical recoveries to be achieved, as well as capital and operating costs to be incurred. In order to establish reasonable grounds for the use of income-based valuations in public reports in the Australian context, regulators and industry bodies regard the minimum requirement is for a project to be supported by an Ore Reserve which has been established through a completed techno-economic study to at least a pre-feasibility study level. This level of study is deemed to be required to demonstrate the robust nature of the defined mineralisation and provide sufficient confidence in the underlying modify factors used to convert defined Mineral Resources to Ore Reserves.

As at the Valuation Date, no Ore Reserves were defined at any of ERA's existing projects, including Jabiluka, and ERA had not completed any current pre-feasibility level studies at that Project, with the most recent techno-economic study being an update of a 2007 OoM study completed in 2011 (refer Section 4.3.3). As such, SRK does not consider it has reasonable grounds to adopt income-based valuation methods for the assessment of value associated with the Jabiluka MLN1.

Furthermore, in line with its mandate from LEA to:

...provide:

- a) *An unencumbered value of MLN1 – in particular, unencumbered by the Renewal Decision and Traditional Owner consent, and thus prior to the change to no longer recognise a Mineral Resource for MLN1*
- b) *An “as is” opinion on the value of MLN1, reflecting encumbrances arising from the Renewal Decision and position of the Traditional Owners and, if considered appropriate, the circumstance that ERA no longer recognises a Mineral Resource for MLN1.*

SRK has divided its valuation for Jabiluka MLN1 into two sections:

Part A considers the unencumbered value of the defined Mineral Resources recently held at Jabiluka as summarised in Table 4.3. In doing so, SRK has adopted precedent transaction analysis (using both mineral asset and corporate level datasets) as its primary valuation approach. The derived values determined using this approach were then cross-checked against values determined using the peer trading multiples method.

Part B considers the value of MLN1, reflecting encumbrances arising from the Renewal Decision, the ongoing opposition by Traditional Owners and the resultant decision by ERA to no longer recognise a Mineral Resource for MLN1. Given Jabiluka MLN1 is known to host relatively well-defined uranium mineralisation, but that a valid pathway towards future development remains to be determined, SRK has elected to adopt a discount to the values implied in Part A to reflect the greater uncertainty toward eventual development (via a top down approach) and cross-checked this value using a geoscientific rating method and a select form of the precedent transaction method (adopting a bottom-up approach).

For the valuation of the exploration potential at Coopers Creek, SRK elected to adopt values implied by precedent transactions analysis which have been cross-checked using a geoscientific rating approach.

SRK notes the valuation methodologies adopted, as outlined above, are consistent with those used by other practitioners in previously assessing the mineral assets of ERA and are also aligned with SRK's and other practitioners' recent valuation practice in relation to other third-party ISRs pertaining to mineral assets in the Northern Territory.

7.4 Indicators of value

7.4.1 Terminated sale

On 29 July 2024, ERA confirmed that it had received a non-binding indicative offer (NBIO) from Boss Energy Limited (Boss) to purchase MLN1 for A\$550 M, subject to conditions including due diligence (including Boss being satisfied with the status of MLN1) and that any transaction involving Boss would have relevant regulatory and third-party approval (including Boss having the full support and approval of the Mirarr Traditional Owners, the Northern Land Council, relevant

regulatory bodies and the Federal Government)¹⁶. The proposal included a number of features including a 10% free carried interest (post recovery of capital) in favour of a Northern Territory focused indigenous foundation to support indigenous communities.

Discussions were in the preliminary stages prior to the proposal being withdrawn following the announcement of the NT government on 26 July 2024 advising that MLN1 would not be renewed based on advice from the Commonwealth government (the Renewal Decision)¹⁷.

Based on the stated Mineral Resource as set out in Table 4.3 of this Report, the implied value of the Boss transaction (had it been successful) was A\$1.82/lb (raw) or A\$1.53/lb U₃O₈ (normalised to February 2025 averaged daily uranium price).

Having considered both the Boss and ERA announcements, and having reviewed the NBIO (on a confidential basis), SRK has been unable to draw a clear conclusion regarding the value implications of the Boss offer. While the approval by relevant regulatory and third-party approvals (including Ministerial and Northern Land Council approvals) are outlined in all three documents reviewed, none expressly state whether such consent was merely required for the transaction to proceed, or whether such consent extended to Traditional Owner agreement to the future development of Jabiluka. This ambiguity regarding the definition and scope of 'consent' is not surprising, given: i) the preliminary nature of the NBIO, ii) due diligence remained to commence (including initial discussions with regulatory and Traditional Owner bodies) and iii) final binding terms / timing to completion remained to be negotiated and agreed. Ultimately, the offer was withdrawn without a final negotiated price being determined.

7.4.2 Book value

In ERA's 2023 Annual Report, as released to the ASX on 12 March 2024, ERA noted the carrying value of the Jabiluka Mineral Lease was A\$90 M¹⁸.

Following the NT Minister's decision not to renew Jabiluka MLN1 (the Renewal Decision) in July 2024, ERA noted the following in its Entitlement presentation¹⁹:

ERA has for accounting purposes fully impaired the Jabiluka Mineral Lease as at 30 June 2024. This accounting treatment does not preclude or influence ERA's legal rights or actions regarding the Jabiluka Mineral Lease and the Renewal Decision. However, while ERA continues to challenge the Renewal Decision (see ERA's ASX announcements...), there is a risk that it is not set aside or that the Jabiluka Mineral Lease is not renewed, in which case ERA will not continue to report any value for Jabiluka Mineral Lease.

¹⁶ Boss Energy ASX announcement "Media speculation" date 29 July 2024, source <<https://announcements.asx.com.au/asxpdf/20240729/pdf/0660yy1ht07b5k.pdf>>.

¹⁷ ERA ASX announcement "Capital Raising Presentation (for Entitlement offer) dated 29 August 2024, refer page 29 of 42, source <<https://announcements.asx.com.au/asxpdf/20240829/pdf/0677gljntnrndx.pdf>>.

¹⁸ ERA ASX announcement "Annual Report 2023", dated 12 March 2024, refer pages 31 and 85, source <<https://announcements.asx.com.au/asxpdf/20240312/pdf/061f7nkn2jx8tc.pdf>>.

¹⁹ ERA ASX announcement "Capital Raising Presentation (for Entitlement offer) dated 29 August 2024, refer page 29 of 42, source <<https://announcements.asx.com.au/asxpdf/20240829/pdf/0677gljntnrndx.pdf>>.

Even if the Renewal Decision is overturned and ERA is successful in securing the renewal of the Jabiluka Mineral Lease, the valuation of Jabiluka requires a high degree of judgement. In those circumstances, the carrying value of the Jabiluka Mineral Lease would need to take into account the above uncertainties, as well as certain other underlying assumptions concerning the valuation of the Jabiluka Mineral Lease, including the probability of future development (including an assessment of obtaining any required approval and/or support of various stakeholders, including Traditional Owners, regulatory bodies, and shareholders), the potential for the NT Minister to amend the conditions of the Jabiluka Mineral Lease (in the event that the Renewal Decision is set aside and a renewal of the Jabiluka Mineral Lease is ultimately granted), uranium oxide prices (such as term contract price premiums in the future), foreign exchange rates, production and capital costs, discount rate and mineral resources, lease tenure renewal (August 2024) and development delays.

ERA notes that the Renewal Decision may impact the information previously disclosed in the 2023 Annual Report regarding the reporting of Jabiluka as a Mineral Resource, as well as the form and context in which the Competent Person's findings were initially presented.

In February 2025, ERA issued its ASX Preliminary Final Report²⁰, which was followed on 26 March 2025 by its 2024 Annual Report²¹ which stated:

On 26 July 2024, ERA announced that the Northern Territory government, based on advice from the Commonwealth government, had decided not to renew the Jabiluka Mineral Lease. Subsequently, on 6 August 2024, ERA initiated proceedings in the Federal Court of Australia against the Minister for Resources and Minister for Northern Australia (Commonwealth), the Commonwealth of Australia, the Minister for Mining and Minister for Agribusiness and Fisheries (Northern Territory), the Northern Territory, and the Jabiluka Aboriginal Land Trust. ERA seeks judicial review of the Renewal Decision, citing procedural fairness, natural justice, and other defects in the decision-making process, and on 8 August 2024 the Court made an interim order to stay the decision to refuse to extend the lease, the effect of that decision and its enforcement or execution, pending further order of the court. Proceedings are ongoing.

The Jabiluka Mineral Lease has been fully impaired given the non-renewal decision.

Even if ERA is successful in securing a renewal of the Jabiluka Mineral Lease, whether following the Court proceedings referred to above or otherwise, in accordance with the long-term care and maintenance agreement signed by ERA in 2005, the Jabiluka deposit will not be developed by ERA without the approval of the Mirarr Traditional Owners.

²⁰ ERA ASX announcement 'Appendix 4E Energy Resources of Australia Ltd Year Ended 31 December 2024' dated February 2025, refer page 4 of 15, source < <https://cdn-api.markitdigital.com/apiman-gateway/ASX/asx-research/1.0/file/2924-02917666-2A1580750> >.

²¹ ERA ASX announcement 'Energy Resources of Australia Ltd, 2024 Annual Report' dated 26 March 2025, refer page 50 of 82, source < <https://announcements.asx.com.au/asxpdf/20250326/pdf/06h13xsm3zs5gl.pdf> >.

With further at page 78 of ERA's 2024 Annual Report, which noted:

In line with the requirements of the JORC Code (2012), ERA has assessed the reasonable prospects for eventual economic extraction (RPEEE) for Jabiluka. Due to the non-renewal decision of the associated lease, currently subject to legal proceedings, the Mirarr people's publicly stated opposition to further mining and the operation of ERA's Long Term Care and Maintenance Agreement, the Competent Person has determined that Jabiluka no longer meets the criteria for reporting as a Mineral Resource. As a result, the Company will no longer include Jabiluka in its reported Mineral Resources. ERA will continue to monitor developments, including the outcome of legal proceedings, and will reassess if there are any material changes in circumstances.

SRK notes that, should they be implemented, the proposed changes to the JORC Code represent a significant transition for all Australian mineral companies going forward. It changes the obligations on reporting companies from demonstrating "reasonable prospects for eventual economic extraction (RPEEE)" to "reasonable prospects for economic extraction (RPEE)", which, on face value, is an overall higher threshold to be met. SRK considers that ERA's Competent Person has given reasonable consideration to the RPEEE criteria and, despite the removal of the word 'eventual', considers that an interpretation that the RPEE is materially different to the RPEEE in adopting a conservative approach. Given this threshold arguably represents a new direction for the JORC Code, SRK is currently unable to comment meaningfully on its likely future interpretation by reporting companies, regulators and the broader market and the resulting ramifications of any such change.

However, one change that can be reliably predicted is that reporting companies will be required to overall increase disclosure on technical aspects associated with their mineral projects with emphasis on RPEE(E), environmental, social, and governance considerations. Any such increased disclosure may expose gaps between work previously completed by the reporting company and market expectations. It is reasonable to expect that reporting companies will fully re-evaluate their existing resource / reserve base once the new version of the JORC Code is released to confirm their currently stated positions remain valid or update the associated estimates to ensure compliance. The implementation of any such changes is likely to be subject to a grandfathering period, such that the company may optimise the timing of any such disclosures to the market.

Noting ERA's decision to fully impair the carrying value of Jabiluka (i.e., nil value) in its most recent financial accounts and given the various uncertainties associated with the status of Jabiluka MLN1 as outlined in the preceding statements, LEA has requested SRK to consider the value of Jabiluka in light of ERA's decision to no longer report Mineral Resources, including the potential impact arising from proposed changes to the JORC Code. These ongoing and unresolved uncertainties have been deliberated and are reflected in the derived values outlined in the following sections of this report.

7.5 Market evidence

7.5.1 Mineral Resources

Precedent transaction analysis

Mineral asset transactions

In considering the recent market for mineral assets similar to the Jabiluka Project, SRK reviewed and assessed transactions involving Australian uranium projects that were completed between January 2018 and the Valuation Date. Other key search criteria included projects that remained in development (spanning scoping to FS levels), envisaged conventional underground mining and processing operations, but without significant installed infrastructure in place. SRK notes that due to the paucity of transactions, it has considered a wider 'lookback' window than would normally be the case. In this instance, it has placed greater weighting on the values implied by more recent transactions.

Based on this selected time period, SRK identified six transactions involving Australian uranium projects for which sufficient information was available to calculate implied resource multiples. Given the paucity of transactions involving Australian uranium transactions (particularly those involving underground mining operations and/or at higher grades of contained uranium), SRK elected to expand its search to include uranium projects in Canada and the United States of America which had transacted over this same period, given the similar geopolitical risk rating and presence of higher grade uranium deposits in these jurisdictions. This search returned 21 transactions.

In considering the multipliers to be applied to the defined Mineral Resources associated with ERA's mineral assets, but specifically the Jabiluka MLN1, SRK has considered transactions relating to higher grade (+0.25% U₃O₈) uranium projects. Initially, SRK considered transactions relating to uranium projects above a +0.5% U₃O₈ grade; however insufficient transactions in the dataset led to this threshold being lowered to +0.25% U₃O₈. This has typically resulted in a preference for unconformity related uranium projects within the Alligator River area of Australia's NT and the Athabasca Basin of Alberta and Saskatchewan in Canada; however, there are several transactions outside of these regions.

Taking into account the grade of the contained U₃O₈ in the previously defined Mineral Resource, SRK then filtered these transactions to only consider those with a grade in excess of 0.25% U₃O₈ (based on Jabiluka's total Measured, Indicated and Inferred Resource grade of 0.55% U₃O₈). This decreased the number of transactions for consideration from 21 to 7. Of these, four are in the scoping to pre-feasibility category (i.e. as per the prevailing status at Jabiluka).

The implied transaction multiple was then expressed in Australian dollars per pound of contained U₃O₈; these multiples were calculated from the stated transaction value (at the grossed up acquisition cost) and the total contained resource and/or reserve pounds of contained U₃O₈ defined within the project at the time of the transaction. SRK's implied value calculations are for the purpose of its valuation and do not attempt to estimate or reflect the amount of metal likely to be recovered by production as required under the JORC Code (2012).

To remove fluctuations in the uranium price between the transaction and valuation dates, SRK has normalised transaction multiples to the prevailing monthly averaged uranium price. The transaction

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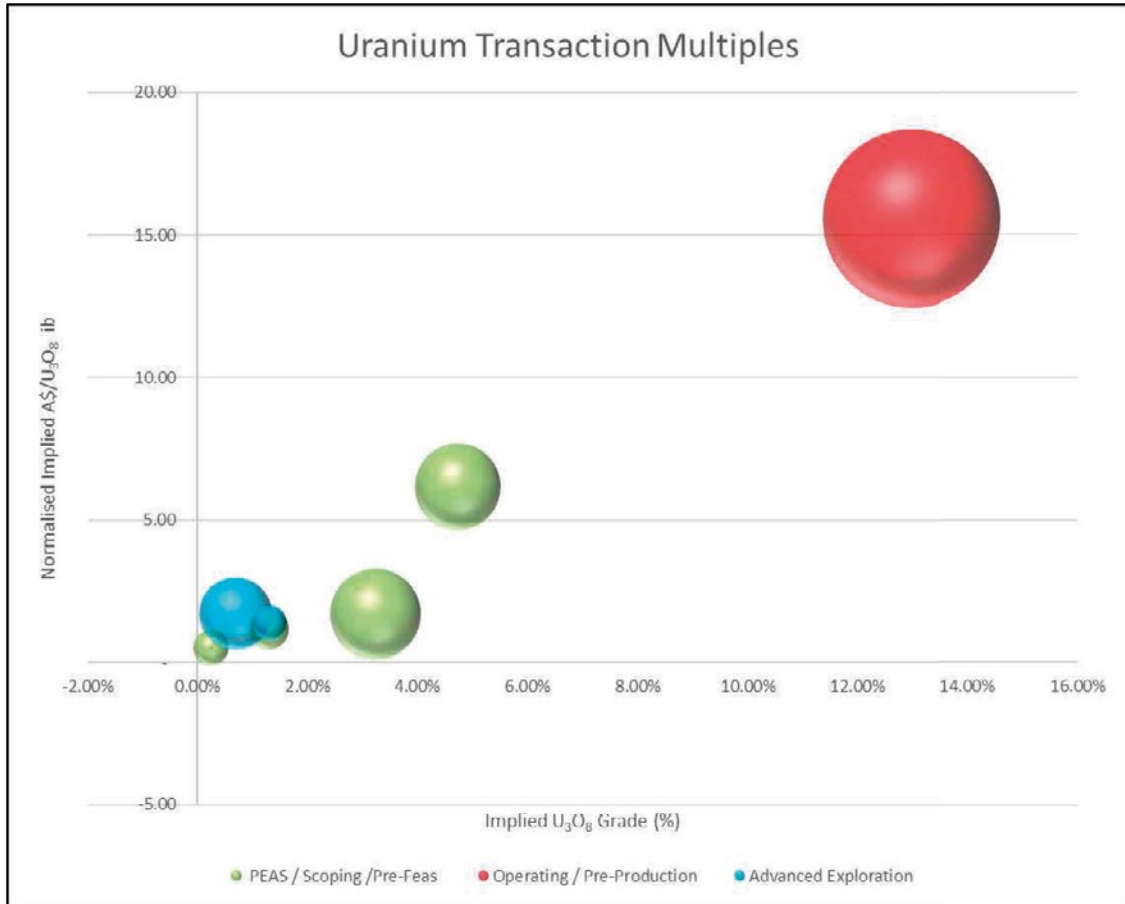
multiples have been adjusted by normalisation using the difference between the average monthly uranium spot price at the time of the transaction and the averaged monthly uranium price during the month preceding the Valuation Date (i.e. February 2025 – US\$67.21/lb U₃O₈, which converts to A\$106.62/lb U₃O₈). Both the raw and normalised values are presented.

Figure 7.1 shows the variance in the implied values for projects with Mineral Resources according to the average uranium grade (shown in percentage U₃O₈ or % U₃O₈) and the development status of the Mineral Resources. The size of the bubble reflects the quantum of the contained U₃O₈ pounds in the Mineral Resource. Further details are outlined in Appendix B.

Importantly, while transaction multiples are widely used in valuation, they rely on the assumption that the defined Mineral Resources have been appropriately reported and can be taken at face value. As such, the method assumes that differences in reporting regimes between different Competent Persons, resource classification, metal recovery and adopted cut-off grades (which may change between assets and/or companies) do not materially influence the implied multiple. The method implicitly assumes total recoverability of all metal tonnes or pounds, as reliable and accurate data are generally not disclosed or available around the time of most transactions or for all companies. Importantly, SRK's implied value calculations are for the purpose of its valuation and do not attempt to estimate or reflect the metal likely to be recovered as required under the JORC Code (2012).

In summary, for assets at the scoping to pre-feasibility levels (i.e. as per the prevailing status at Jabiluka) the following implied multiples are evident (Figure 7.1).

Figure 7.1: Key precedent transaction statistics 2018–2025 (above 0.25% U₃O₈)



Source: SRK analysis

SRK notes that while the 2022 Ben Lomond transaction met the criteria for inclusion in the precedent transaction dataset, it should be considered as being indicative of encumbered value rather than unencumbered value, as uranium mining is prohibited in Queensland.

Furthermore, the estimate of Mineral Resources associated with the 2022 Ben Lomond transaction was considered to be a historical estimate under NI 43-101 standards, as insufficient work had been done by the Qualified Person to classify the historical estimate as current Mineral Resources. As a result, the historical estimate was not being treated by either the vendor or purchaser at the time of the 2022 transaction as a current Mineral Resource.

As such, SRK has reported the key statistics arising from these transactions at Ben Lomond, but has ultimately elected to exclude Ben Lomond from its initial precedent transaction dataset. The Ben Lomond transaction is discussed in further detail in Section 7.6.3 Bottom-up view.

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Table 7.3: Key precedent transaction statistics 2018–2025 (above 0.25% U₃O₈)

Development status	Scoping – pre-feasibility (all transactions)		Scoping – pre-feasibility (excl. Ben Lomond)	
	Implied Multiple (A\$/lb U ₃ O ₈)		Implied Multiple (A\$/lb U ₃ O ₈)	
Statistics	Raw	Norm	Raw	Norm
Count	4	4	3	3
Minimum	0.35	0.53	0.37	1.04
Median	0.45	1.28	0.54	1.53
Average	1.36	2.16	1.69	2.70
Maximum	4.17	5.53	4.17	5.53
Weighted average	1.42	2.43	1.47	2.52
25th percentile	0.36	0.91	0.45	1.28
75th percentile	1.45	2.53	2.35	3.53
90th percentile	3.08	4.33	3.44	4.73

Source: SRK Analysis (2025)

Notes: Norm – normalised to February 2025 averaged daily uranium price.

While SRK considered transactions involving mineral assets in production and at advanced exploration stages, these were deemed not to be appropriate given the status of the Jabiluka MLN1. Furthermore, SRK notes that no transactions relating to projects at either the feasibility stage or in care and maintenance (C&M) were identified over the period considered.

Table 7.4: Summary Scoping – Pre-feasibility transaction details (above 0.25% U₃O₈)

Announce	Project	Parties	Type	Interest (%)	Resource (Mlb U ₃ O ₈)	Multiple (A\$/lb U ₃ O ₈)	
						Raw	Norm
12 Oct 22	Roughrider (CA)	UEC – Rio Tinto	OC/UG	100	57.4	4.17	5.53
15 Jun 22 [^]	Ben Lomond (AU)	Consolidated – Mega	OC/UG	100	10.7	0.35	0.53
10 Mar 21	Alligator River (AU)	Viva – Rio Tinto	UG	21	26.1	0.37	1.04
4 Sep 18	Wheeler River (CA)	Denison – Cameco	UG/ISR	90	134.7	0.54	1.53
All transactions					Average	1.36	2.16
					Median	0.45	1.28
Excluding Ben Lomond					Average	1.69	2.70
					Median	0.54	1.53

Source: SRK Analysis, 2025

Notes: For further details refer to Appendix B.

Norm – normalised to February 2025 averaged daily uranium price, OC – open cut; UG – underground; ISR – in situ recovery.

[^]the Ben Lomond transaction reflected in the table above represents the exercise of an option that was taken out in 2020; for further information please refer to Appendix B.

SRK notes, that based on its review of precedent mineral asset transactions, the recent market has been paying (on a normalised basis) in the range of A\$1.04/lb to A\$5.53/lb U₃O₈ for in situ uranium

resources in the Indicated and Inferred Resource categories at the scoping to PFS level in Australia and North America (Table 7.3).

Based on its review of the relevant precedent transaction dataset (refer to Appendix B for further details), SRK notes the following:

1. None of the precedent transactions are directly comparable to Jabiluka in terms of the combined effects of development status, geological setting, scale, grade or approvals/permitting.
2. Regarding location, SRK notes two transactions relate to Australian projects in Queensland (Ben Lomond in 2022) and the Northern Territory (Alligator River in 2022), while the other two transactions relate to Canadian projects in Saskatchewan (Roughrider in 2022 and Wheeler River in 2018).
3. In SRK's view, the Athabasca Basin of North America provides the best global analogue for the prices likely to be paid in the current market for high-grade ($+0.25\% \text{U}_3\text{O}_8$), underground uranium resources under a permissive regulatory regime. While higher grade resources may also be found in other jurisdictions (such as Kazakhstan), these tend to be extracted using ISL recovery methods and would likely attract discounts for geopolitical reasons relative to similar assets in North America.
4. SRK has focused on transactions relating to higher grade uranium ($>0.25\% \text{U}_3\text{O}_8$ in Mineral Resource) at the Preliminary Economic Assessment (PEA)/Scoping Study level as this best reflects the development status positioning that would be adopted by market participants in evaluating Jabiluka.
5. Lower resource multiples tend to be associated with projects that are at a significantly earlier stage of assessment when compared to the Jabiluka Project.
6. Higher resource multiples tend to be attributed by the market to projects which are more advanced than Jabiluka (i.e. in production), as the transaction value includes the value associated with installed infrastructure, including processing facility, tailings facilities and associated ancillary infrastructure, but excludes any implementation and/or execution risk.
7. The environmental liabilities associated with an underground operation such as at Jabiluka tend to be lower when compared to a conventional open pit uranium mining operation, in part due to the smaller footprint of the operation and the potential to store tailings in underground voids to ensure the naturally occurring daughter radionuclides are not released to the environment.
8. With the exception of the Ben Lomond Project (Total Mineral Resource grade of $0.251\% \text{U}_3\text{O}_8$), the remaining three identified transactions relate to projects with higher uranium resource grades than evident at Jabiluka. It is reasonable to assume that these projects may trade at a premium to Jabiluka given the higher grade and resultant operating cost implications, all other things being equal.
9. However, the Jabiluka Project has a materially greater content of contained uranium in defined Mineral Resources than the precedent transactions considered (refer Table 7.4, where the largest contained uranium content is at Wheeler River which contains 134 Mlb U_3O_8 versus 302 Mlb U_3O_8 at Jabiluka).

10. Unlike Jabiluka, none of the transactions involved Measured Resources; however, Wheeler River included a Probable Mineral Reserve of 107.8 Mlb U₃O₈.
11. SRK notes the following with regards to the transactions relating to projects within Australia:
- a. Ben Lomond – this is discussed in further detail in Section 7.6.3 Bottom-up view.
 - b. Alligator River – this transaction involved the purchase of a minority interest (20.89%) to move to full ownership of the Alligator River assets located to the northeast of Ranger and Jabiluka (and outside of the Kakadu National Park within Arnhem Land). At the time of the transaction, a small Inferred Mineral Resource of 26 Mlb U₃O₈ at 1.3% U₃O₈ had been defined at Angularli along with an Exploration Target of 20–60 Mlb U₃O₈ at between 0.75% U₃O₈ and 1.5% U₃O₈. The project had been subject to a successful scoping study in December 2018 based on a 9-year LOM via conventional underground mining method and processing.
12. SRK notes the following with regards to the transactions relating to projects within the Athabasca Basin:
- a. Roughrider – a preliminary economic assessment relating to the underground development of the Roughrider East and West deposits was released by Hathor in September 2011 (prior to the 2022 transaction date). This 2011 study did not include the Far East Zone which may provide additional upside. This study was based on Indicated and Inferred Resources of 555,800 t at 4.73% U₃O₈ for approximately 57.94 Mlb contained U₃O₈, with several higher grade (>10% U₃O₈) lenses defined across the two deposits. The deposits are located near established infrastructure, notably 11 km from the McClean Lake mill. Underground mining was to be completed using raise boring developed below a grout or freeze cover and accessed via a decline. Sensitivity analysis demonstrated the project was very robust. An advanced exploration program proposal was submitted in July 2013 as a precursor to an environmental impact assessment of the Project. This proposal involved the development of upgraded road access, an exploration shaft, drifts and operation of a water treatment facility, surface support structures and temporary surface storage of both development rock and low-grade waste. The application was accepted and the project advanced to environmental impact assessment review; however, no official determination was completed. The upgraded road access was completed but no other items from the proposal proceeded.
 - b. Wheeler River – the 2018 acquisition increased Denison's interest in the Wheeler River JV to 90%. Wheeler River hosts the Phoenix and Gryphon uranium deposits which were estimated to contain combined Indicated and Inferred Mineral Resources of 1.89 Mt at 3.24% U₃O₈ for approximately 135.1 Mlb contained U₃O₈. The project is supported by road and power, with connections to Cameco's McArthur River mine and Key Lake mill complex. Prior to completion of the transaction, Denison reported the results of a PFS based on co-development of ISR mining at the Phoenix deposit and conventional longhole open stope underground mining at Gryphon. ISR mining at Phoenix required the installation of a freeze-wall above the ore zone to contain groundwater movement, while significant capital and operating expenditures were expected to support Gryphon's future development and mining. The potential for credits from rare earth element by-products was also noted. The introduction of ISR mining, a low-cost mining method, to Phoenix represents a novel mining approach and the first application of ISR mining in the Athabasca Basin.

13. In considering the multiple to apply to Jabiluka, SRK notes the presence of potentially economic quantities of gold mineralisation associated with the uranium ores at Jabiluka. Importantly, the gold cannot be selectively mined and would be mined concurrently with the uranium ores. The payability of the gold would need to be demonstrated prior to the commencement of mining.

Based on its consideration of the foregoing factors relating to Precedent Transaction analysis as it related to mineral assets, SRK considers that the market would pay in the range of A\$2.40/lb U₃O₈ to A\$4.80/lb U₃O₈ for a 100% interest in the Jabiluka Measured, Indicated and Inferred Mineral Resources (on an unencumbered basis). This range is informed by:

- **Low end of range** – the average and weighted average values (normalised) for the PEA/Scoping dataset (excluding Ben Lomond) as outlined in Table 7.3.
- **High end of range** – the 90th percentile (normalised) for the PEA/Scoping dataset (excluding Ben Lomond) as outlined in Table 7.3, noting that the dataset is based on transactions involving only Indicated and Inferred Resources.

To this end, SRK has elected to adopt the following multiples for valuation purposes as implied by its analysis of Precedent Transaction multiples: Measured Resources A\$4.00–4.80/lb U₃O₈, Indicated Resources – A\$3.20–4.00/lb U₃O₈ and Inferred Resources – A\$2.40–3.20/lb U₃O₈ (on an unencumbered basis). SRK has adopted consistent increments of A\$0.80/lb U₃O₈ across each of the categories.

SRK notes that its adopted multiples lie between those implied by the Roughrider and Wheeler River transactions on a normalised basis. Both these transactions involve higher grade mineralisation than at Jabiluka (albeit as smaller overall scale) and are located in proximity to established infrastructure.

In assigning the multiples for the Measured Resources at Jabiluka, SRK is also cognisant that the available dataset is based on Indicated and Inferred Resources only. Furthermore, the Roughrider transaction implies a higher multiple than that assigned by SRK to Measured Resources. Typically, SRK would anticipate Measured Resources would transact at a premium to Indicated and Inferred Resources. However, in reviewing the dataset, SRK notes that its adopted positioning for its multiples (including Measured) is higher than for the remaining transactions, spans the 90th percentile and approaches the maximum value of the dataset. SRK considers Roughrider likely to trade at a premium to Jabiluka due to its higher uranium grade (including lenses >10% U₃O₈), proximity to established infrastructure and completed environmental studies. To this end, SRK is comfortable with its positioning of the implied values attributed to the Measured Resources at Jabiluka based on the values implied by the remaining two transactions.

Corporate entity transactions

In addition to its analysis of precedent transactions involving mineral assets, SRK has also completed a review of recent transactions relating to corporate entities, whose principal activities relate to the exploration and development of uranium assets in Australia, Africa and North America. Companies were screened based on uranium in the company description, and then uranium-radium-vanadium ores. Both screened groups were then filtered for the following:

- Transaction announced in the 5 years prior to 20 February 2025.

- Transaction value in excess of US\$20 M.
- Any location.
- Transaction identified as completed.
- Reported contained uranium in Mineral Resource in excess of 40 Mlb U₃O₈.

Based on these selection criteria, SRK identified the corporate transactions as outlined in Table 7.5 and Appendix B.2.

Table 7.5: Corporate transaction summary details

Announce	Target	Acquirer	Mineral Interests (100%) A\$ M	Reserve (Mlb U ₃ O ₈)	Resource (Mlb U ₃ O ₈)	Resource Multiple (A\$/lb U ₃ O ₈)	
						Raw	Norm
Jun 24	Fission Uranium Corp	Paladin Energy Ltd	583	93.7	130.3	4.5	3.8
Jun 22	UEX Corp.	Uranium Energy Corp	300	5.5	146.2 [#]	2.1	3.2
Nov 21	Vimy Resources Ltd	Deep Yellow Ltd	257	42.3	116.0	2.2	3.7
Average						2.9	3.6
Median						2.2	3.7

Source: LEA and SRK Analysis, 2025

Notes: For further details refer to Appendix B.2

Norm – normalised to February 2025 averaged daily uranium price.

[#] If historical resources are excluded, the total contained U₃O₈ falls to 101.2 Mlb and resource multiple increases to A\$3.0/lb (raw) or A\$4.5/lb (normalised).

Other transactions considered but ultimately excluded from SRK's preferred dataset include: Consolidated Uranium Inc – IsoEnergy (September 2023), A-Cap Energy Ltd – Lotus Resources Ltd (July 2023), Virginia Energy Resources Inc - Consolidated Uranium Inc (November 2022), Uranium One Americas, Inc – Uranium Energy Corp (November 2021) and Azarga Uranium Corp – encore Energy Corp (September 2021). In excluding these transactions, SRK notes that:

- Consolidated Uranium Inc's mineral asset portfolio consisted predominantly of historical resources in Utah and Colorado (along with the Matoush project in Canada and the Yarranna, Ben Lomond and Milo options in Australia), had total resource grades <0.1% U₃O₈, with all US projects comprising past producing uranium and vanadium mines able to be rapidly advanced pending improvement in market conditions. The Company had entered into a toll milling agreement in relation to the White Mesa mill in Utah.
- A-Cap Energy Ltd principal mineral asset was the Letlhakane uranium resource project located in Botswana and a 55% interest in the Wilconi nickel laterite JV project (with high capital cost) in Western Australia. Letlhakane had a large, total resource with grades <0.1% U₃O₈, but remained in the advanced exploration stage (refer VRM report, 2023)²².
- Virginia Energy Resources Inc mineral assets at Coles Hill were entirely classified as historical resources (studied to feasibility level in 1980s then shelved until 2007, no activities since 2013) and had total resource grades <0.1% U₃O₈. The Coles Hill project is located in close proximity to established infrastructure and labour. There has been a moratorium on conventional uranium mining on private land in the State of Virginia since 1982 and hence future development requires legislation to be enacted authorising and establishing a permitting program.
- Uranium One America's mineral assets relate entirely to historical resources, had total resource grades <0.1% U₃O₈, combined size <50 Mlb U₃O₈, predominantly target ISR extraction and incorporate existing plant and infrastructure.

²² Valuation and Resource Management, 2023, 'Independent Technical Assessment and Valuation Report', presented to A-Cap Energy Limited dated 15 September 2023, page 37, source <<https://announcements.asx.com.au/asxpdf/20230918/pdf/05v05m6qdj8gxx.pdf>>.

- Azarga mineral assets comprised a pipeline of exploration and development staged ISR uranium projects, had total resource grades <0.1% U₃O₈, combined size <50 Mlb U₃O₈, comprised multiple deposits (+5) which were geographically dispersed (in South Texas, South Dakota and Wyoming).

SRK notes that, based on its review of precedent corporate entity transactions, the recent market has been paying (on a normalised basis) in the range from A\$3.20/lb to A\$3.70/lb U₃O₈ for companies holding in situ uranium Resource projects in Australia and North America (Table 7.5).

Based on its review of the relevant precedent transaction dataset for corporate entities (refer to Appendix B.2 for further details), SRK notes the following:

1. None of the precedent corporate level transactions involve companies which hold mineral assets directly comparable to those at Jabiluka in terms of the combined effects of development status, geological setting, scale, grade or approvals/permitting.
2. With regards to location, two transactions relate to Canadian listed companies with mineral assets in either Canada or the US (Fission in 2024 and UEX in 2022), while the other transaction relates to an Australian listed entity with projects in Western Australian and the Northern Territory (Vimy in 2021).
3. SRK notes the following with regards to the mineral assets held by Fission and their comparability to Jabiluka:
 - a. Fission's key asset is Paterson Lake South (PLS) which is located in the Athabasca Basin in relatively remote area of northwestern Saskatchewan, Canada.
 - b. Tenure at PLS consists of 17 contiguous mineral claims covering 31,039 ha, as opposed to a single granted ML covering 72.75 km² (7,275 ha) at Jabiluka.
 - c. Climatic factors restrict exploration and development activities throughout the year. At PLS, there is a high boreal climate with snow covering the area 6–8 months of the year. This compares to a tropical climate at Jabiluka, where movement is restricted during the wet season which is characterised by high rainfall and occasional cyclonic activity.
 - d. Both PLS and Jabiluka are unconformity style deposits with coherent mineralisation hosted within a single deposit in metamorphosed basement rocks. Five mineralised zones have been modelled within 50 m of surface at the Triple R deposit at PLS, while nine units are recognised at Jabiluka and continue to at least 500 m depth.
 - e. Mineral Resources at PLS are classified as Indicated and Inferred (inclusive of a Probable Reserve) and total 130.3 Mlb U₃O₈ at 1.78% U₃O₈, with a majority of the defined Mineral Resource in the Indicated category (88%). This is smaller but higher grade than Jabiluka's 302 Mlb U₃O₈ at 0.55% U₃O₈, which is classified as Measured, Indicated and Inferred (with 60.5% in the Measured and Indicated categories).
 - f. There are no defined Reserves at Jabiluka compared to 93.7 Mlb U₃O₈ at 1.41% U₃O₈ at PLS.
 - g. Both PLS and Jabiluka host gold mineralisation in association with the uranium ores, with PLS hosting Indicated and Inferred gold resources of 61.7 koz of contained gold at a grade of 0.58 g/t Au. Importantly, the gold cannot be selectively mined and would be mined concurrently with the uranium ores. The payability of the gold would need to be demonstrated prior to the commencement of mining.

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- h. PLS was more advanced than Jabiluka having been studied to an FS level in January 2022 with front-end engineering design (FEED) studies nearing completion at the time of the 2024 transaction. The FS was based on accessing the deposit using a decline and two vertical shafts, with mining to be completed using a longhole open stoping method in longitudinal retreat and cemented rock fill as the backfill. A 10-year mine plan was envisaged with a production target of 9.1 Mlb U₃O₈ per annum from 2029.
 - i. Like Jabiluka, processing was expected to be via conventional and proven uranium extraction technologies, processes and equipment based on other Athabasca processing plants. Anticipated overall recovery at PLS was forecast at 97%.
 - j. Like Jabiluka, there is no permanent infrastructure on site at PLS other than proximity to the all-weather gravel highway 955. PLS was envisaged to require several developments including underground mine workings, processing facilities, tailings management facility, transportation connections, and ancillary equipment.
 - k. Extensive baseline studies and preliminary environmental risk assessment have been completed as the basis for progression of various environmental approvals at PLS.
 - l. In addition to PLS, Fission also holds other early-stage exploration projects including West Cluff (11,148 ha) and Larocque (958 ha) in the Athabasca Basin. Both these projects are located in proximity to existing mining and processing infrastructure. Including former Cluff Lake mine and Cameco's Larocque and IsoEnergy's Hurricane deposits.
 - m. SRK notes that the 2024 transaction was an all-script transaction completed at a relatively high share price.
 - n. Based on its review, SRK considers the mineral assets held by Fission to be superior to those at Jabiluka and as such would expect that the market would adopt a multiple that was lower than that attributable to Fission as at the Valuation Date.
 - 4. SRK notes the following with regards to the mineral assets held by UEX and their comparability to Jabiluka:

 - a. At the time of the June 2022 transaction, UEX had a portfolio of 29 uranium projects covering key areas of the producing eastern side and development western side of the Athabasca Basin in Canada. Five of the 29 projects were advanced resource stage projects in joint venture with established uranium miners; these included:

 - i. A 49.1 % interest in Shea Creek with Indicated Resources of 67.8 Mlb U₃O₈ and Inferred Resources of 28.1 Mlb U₃O₈ (100% basis).
 - ii. A 100 % interest in Horseshoe Raven open pit amenable project in proximity to Cameco's Rabbit Lake mill with Indicated Resources of 37.4 Mlb U₃O₈ (100% basis).
 - iii. An 82.8 % interest in Christie Lake project with Inferred Resources of 20.4 Mlb U₃O₈ (100% basis).
 - iv. A 16.9 % interest in Kiggavik, a feasibility stage project in Nunavut with Indicated Resources of 127.3 Mlb U₃O₈ and Inferred Resources of 5.4 Mlb U₃O₈ (historical estimate, 100% basis).
 - v. 15 % interest in the Millennium feasibility stage project in proximity to McArthur River mine and Key Lake Mill with Indicated Resources of 75.9 Mlb U₃O₈ and Inferred Resources of 29.0 Mlb U₃O₈ (historical estimate, 100% basis).

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- vi. A 5 % interest in Wheeler River, a PFS stage project with Indicated Resources of 132.1 Mlb U₃O₈ (inclusive of Probable Reserves of 109.4 Mlb U₃O₈) and Inferred Resources of 3.0 Mlb U₃O₈ (historical estimate, 100% basis).
 - vii. The remainder of UEX's portfolio consisted of 1 resource level project, 4 mid-stage projects and 18 grassroots projects.
- b. UEX's material assets at the time of the June 2022 transaction were the Christie Lake, Horseshoe-Raven, Shea Creek and West Bear projects which are described below.
- i. Christie Lake was a resource definition stage project in the southern part of the Athabasca Basin. It comprises six contiguous tenures covering 7,922 ha. Work had been primarily limited to drilling and geophysical surveys which defined three mineralised zones in proximity to the basement unconformity. Three deposits (Paul Bay, Ken Pen and Orara) were defined with all Mineral Resources at Christie Lake categorised as Inferred with an average grade of 1.57% U₃O₈, which is considerably higher than that at Jabiluka (0.55% U₃O₈ with Measured, Indicated and Inferred Resource classification), but smaller in overall contained metal (20.4 Mlb U₃O₈ versus 302 Mlb U₃O₈ at Jabiluka).
 - ii. Horseshoe – Raven was located in the eastern Athabasca uranium district and 4 km from the third-party held Rabbit Lake mill. It comprised a single mineral claim covering 4,486 ha. The project was supported by proximity to established infrastructure including transport and processing, as well as electricity transmission lines. A preliminary economic assessment was completed on the project in 2011. Mineralisation at Horseshoe had been defined over a strike length of 800 m and occurred at depths between 100–450 m below surface, while at Raven, mineralisation extended over 1000 m and at depths between 100 m and 300 m below surface. All Mineral Resources at Horseshoe-Raven were classified as Indicated, but grades (0.117% U₃O₈ at Raven and 0.215% U₃O₈ at Horseshoe) and contained metal (combined 37.4 Mlb U₃O₈) were lower than at Jabiluka (0.55% U₃O₈ and 302 Mlb U₃O₈ contained). Both Horseshoe and Raven were being evaluated as underground mines, similar to that a Jabiluka.
 - iii. Shea Creek comprised four deposits (Kianna, Anne, Colette and 58B) over a 3 km strike length in the northern part of the property which was located 5 km south of the former Cluff Lake mine in the Athabasca Basin. The Project comprised 11 mineral claims covering 19,581 ha. It could be accessed from all-weather, maintained gravel roads with exploration conducted from the former Cluff Lake mine camp. Mineralisation occurred at depths in excess of 600 m below surface. Mineral Resources total 67.8 Mlb U₃O₈ (i.e. of smaller scale than at Jabiluka) and were classified as Indicated and Inferred, with the average grade of the Indicated material estimated at 1.491% U₃O₈ and Inferred grades of 1.015% U₃O₈, which were both higher than at Jabiluka (0.55% U₃O₈).
 - iv. West Bear – a resource stage nickel-cobalt project in the Athabasca Basin, in relative proximity to the Rabbit Lake mining operation. The property comprised 27 contiguous tenures covering 11,104 ha within 8 km of provincial power grid and key transportation networks. An Indicated nickel-cobalt Resource was estimated in 2022 and contained 3,763 klb Co and 3,164 klb Ni at average grades of 0.58% Co and 0.49% Ni.

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- c. SRK notes that the implied multiple for UEX is higher (approximately A\$3.0/lb - raw) if the historical resources are excluded from consideration.
 - d. Based on its review and taking into account the multiple mineral assets held by UEX, in particular the trade-off between scale, joint venture interest and grade, on balance, SRK considers the mineral assets held by UEX to be broadly comparable to those at Jabiluka and as such would expect that the market would adopt a similar multiple to that attributable to UEX as at the Valuation Date.
5. SRK notes the following with regards to the mineral assets held by Vimy and their comparability to Jabiluka:
- a. At the time of the transaction in November 2021, Vimy had a portfolio comprising the Mulga Rocks and Alligator River uranium projects in Western Australia and the Northern Territory, respectively.
 - b. Vimy's flagship asset was the Mulga Rock project, a remote feasibility stage uranium project located on unallocated Crown land, approximately 290 km east-northeast of Kalgoorlie on the western margin of the Great Victoria Desert in Western Australia. The project comprised 22 granted tenures (a mix of granted Mining Leases, Exploration Licences, Prospecting Licences, Miscellaneous Licences and applications) covering a combined area of 510 km². At 90.1 Mlb U₃O₈, contained metal in defined Mineral Resources were substantially smaller and lower grade (570 ppm U₃O₈ versus 0.55% U₃O₈) than at Jabiluka, with Measured, Indicated and Inferred Resources defined (same as Jabiluka). Measured and Indicated Mineral Resources accounted for 50.4% of the defined Mineral Resource (Jabiluka 60.5%). A Proved and Probable Ore Reserve (42.3 Mlb U₃O₈ at 845 ppm U₃O₈) has also been defined. Base metal (copper, zinc, nickel and cobalt) Mineral Resources are also defined (versus gold at Jabiluka). The Project had been studied to feasibility stage (more advanced than Jabiluka) which envisaged large-scale open cut mining (versus underground at Jabiluka) of four polymetallic deposits (Ambassador, Princess, Emperor and Shogun) and on-site processing using novel processes (for uranium) to produce a uranium concentrate (at 89% recovery over LOM) over a 16-year mine life. Development of the project was expected to require construction of the processing plant, and other surface and ancillary infrastructure. Ministerial approval had been granted to the project in December 2016.
 - c. Vimy also holds the Alligator River Project located entirely within Aboriginal freehold land in northwest Arnhem Land to the east of Jabiru and Ranger/Jabiluka. The project comprises three land packages namely King River – Wellington Range (1,623 km²), Algado Beatrice (78 km²) and Mount Gilruth (507 km², applications only). The most advanced prospect within this land tenure is the Angularli deposit, where a small, high-grade Inferred Resource of 25.9 Mlb U₃O₈ at 1.29% U₃O₈ and an Exploration Target of 20 60 Mlb U₃O₈ at grades ranging from 0.75% to 1.5% U₃O₈ have previously been defined. These tonnages estimates are smaller in scale, but at higher uranium grades than presently reported at the nearby Jabiluka deposit. No further work had been completed at the project to advance the Angularli deposit at the time of the November 2021 transaction.
 - d. SRK notes that the implied multiple does not account for contained base metal mineralisation in defined Mineral Resources at Mulga Rocks.

- e. Based on its review and taking into account the mineral assets held by Vimy, in particular the trade-off between development status, scale and grade, on balance, SRK considers the mineral assets held by Vimy to be broadly comparable to those at Jabiluka and as such would expect that the market would adopt a similar multiple to that attributable to Vimy as at the Valuation Date.

Based on its consideration of the foregoing factors relating to Precedent Transaction analysis relating to corporate entities, SRK considers that the market would pay in the range of A\$2.20 to A\$4.00/lb U₃O₈ for a 100% interest in the Jabiluka Measured, Indicated and Inferred Mineral Resources (on an unencumbered basis). This range is informed by:

- **Low end of range** – the implied multiples for UEX and Vimy on a raw basis as outlined in Table 7.5.
- **High end of range** – the average value for the corporate entity dataset on a normalised basis as outlined in Table 7.5, noting that this is less than the implied multiple for Fission (raw).

To this end, SRK has elected to adopt the following multiples for valuation purposes as implied by its analysis of Precedent Transaction multiples: Measured Resources – A\$3.40–4.00/lb U₃O₈, Indicated Resources – A\$2.80–3.40/lb U₃O₈ and Inferred Resources – A\$2.20–2.80/lb U₃O₈ (on an unencumbered basis). SRK has adopted consistent increments of A\$0.60/lb U₃O₈ across each of the categories.

Historic transactions

The following section investigates three transactions involving a broadly analogous situation to that which currently exists at Jabiluka, namely a uranium development project surrounded by (but excised from) a National Park, with strong representation from Traditional Owners and other stakeholders.

Jabiluka

Historically, the Jabiluka project hosted Ore Reserves (Probable) were defined at an FS level (albeit the project concept was subsequently redesigned) and had Traditional Owner approval as well as most of the regulatory permits in place to allow for the project to be progressed towards production. Redesign following a change in ownership in early 1990s means that many of these project aspects are no longer relevant and will need to be re-assessed.

On 21 August 1991, ERA completed the acquisition of a 100% interest in the Jabiluka Project from Pancontinental for A\$125 M. At the time of the transaction, the Jabiluka Measured, Indicated and Inferred Mineral Resource comprised 32.44 Mt at 0.44% U₃O₈ for approximately 143,300 t (or 315.92 Mlb) of contained U₃O₈ using the same cut-off grade as employed at Ranger of 0.10% U₃O₈ (ERA Annual Report 1991, page 4). It was noted that past drilling had not fully defined the deposit nor had the cut-off grade been validated by detailed cost studies.

On the basis of the stated Mineral Resource, SRK notes that the implied value of this transaction is A\$0.40/lb (raw) or A\$3.72/lb (normalised to February 2025 average daily uranium price).

Koongarra

On 3 February 1992, Total Compagnie Miniere of France entered an agreement to acquire a 70% interest in the Koongarra Project (located 20 km to the south-southwest of the RPA) from Denison Mines Ltd of Canada for C\$25 M (A\$22 M) with the purchase price to be paid over 4 years²³. Denison retained the remaining 30% interest in the project. The sale was part of a wider agreement which permitted the development of the Midwest and McClean Lake uranium projects in Canada. Denison owns 45% of the Midwest joint venture and Total owns 100% of the McClean Lake uranium reserves both in Saskatchewan.

Reserves for the Koongarra No 1 deposit were estimated to be 14,500 t (31.97 Mlb) U₃O₈ with an average grade of 0.8% U₃O₈ based on a Measured, Indicated and Inferred Mineral Resource of 3.54 Mt averaging 0.44% for 15,200 t (33.5 Mlb) U₃O₈ (Snelling, 1990). Koongarra No. 2 deposit had resources of 2,000 t (4.4 Mlb) U₃O₈ with an average grade of 0.3% U₃O₈ (McKay and Mieztis, 2001). There is a zone of gold mineralisation occurring both within and adjacent to the uranium mineralisation and this was estimated to contain 3,100 kg Au (100,000 oz) with an average grade of 3 g/t Au.

On the basis of the reported Mineral Resources, SRK notes that the implied value of this transaction is A\$0.83/lb (raw) or A\$8.29/lb (normalised to February 2025 averaged daily uranium price).

SRK notes that Cogema acquired the remaining 30% interest in the Koongarra Project in 1995 for an undisclosed sum.

On 14 March 2013, the Commonwealth Government introduced and subsequently passed a bill to reverse the exclusion of the Koongarra deposit from the Kakadu National Park.

Kintyre

On 8 November 2008, an investor group comprising Cameco Corporation (70%) and Mitsubishi Development Pty Ltd (30%) completed the acquisition of a 100% interest in the Kintyre Project (which had been excised from the Rudall River National Park in the Paterson Province of Western Australia) from Rio Tinto for US\$495 M (A\$518.3 M) via a bidding process. At the time of the transaction, Cameco noted its due diligence considered 'the Kintyre project may host mineral deposits ranging from 62 to 80 million pounds U₃O₈ in total with an average grade between 0.3% and 0.4% U₃O₈'.

On the basis of the midpoint of the stated U₃O₈ contained pounds (71 Mlb) and U₃O₈ grade (0.35%), SRK notes that the implied value of this transaction is A\$7.30/lb (raw) or A\$12.60/lb (normalised to February 2025 averaged daily uranium price).

The 2008 Kintyre transaction involved a broadly analogous situation to Jabiluka, namely a uranium development project held by Rio Tinto, which was located within (but excised from) a National Park (Rundall River [now Karlamilyi] in the Paterson Province of Western Australia), with strong representation from Traditional Owners and other stakeholders.

²³ Australian Financial Review 'Total buys Majority Stake in Koongarra' dated 11 May 1992, source< <https://www.afr.com/politics/total-buys-majority-stake-in-koongarra-19920511-k4xvi>>.

The key differences between Kintyre and Jabiluka are that no Mineral Resources were reported at Kintyre at the time of the transaction (with the stated resource figure adopted by SRK for valuation purposes based on the results of Cameco's due diligence as announced to the market on 9 July 2008), development status (advanced exploration stage), the smaller scale (62–80 Mlb, with midpoint of 71 Mlb of contained U₃O₈), and the lower grade (0.3% to 0.4% with midpoint of 0.35% U₃O₈) of defined U₃O₈ mineralisation at Kintyre.

Kintyre was to be developed by a single open pit encompassing several discrete mineralised zones, while Jabiluka is proposed as an underground operation extending from a depth of 100 m to a final depth of approximately 550 m below surface. Mineralisation at Jabiluka remains open along strike and at depth.

In 2012, Cameco recorded a US\$168 M write-down of the carrying value of its 70% interest due to a weakened uranium market. In the fourth quarter of 2016, Cameco recognised a further impairment to the full carrying value of its interest in the Kintyre project, effectively valuing the asset at nil (from US\$273.6 M) due to the weakening of the uranium market (with uranium prices reaching 12-year lows) and its decision not to allocate further spending to the project (despite environmental approvals being in place).

As at 31 December 2016, Kintyre was reported to host an Indicated Resource of 53.5 Mlb of contained U₃O₈ at 0.62% U₃O₈ (Cameco share 37.5 Mlb U₃O₈) and Inferred Resources of 6 Mlb U₃O₈ at 0.53% U₃O₈ (Cameco share of 4.2 Mlb U₃O₈). No further progress towards a development decision was expected until market conditions improved (Cameco, 2016 Annual Report).

In 2018, Cameco acquired the remaining 30% interest in Kintyre from Mitsubishi Development Pty Ltd for an undisclosed sum. This transaction added 16.1 Mlb of U₃O₈ in the Indicated Resource category and 1.8 Mlb of U₃O₈ in the Inferred category to Cameco's mineral inventory.

Summary

Due to changes in the market, it is not appropriate to adopt these long dated and historical transactions as a meaningful guide towards current value. As such, SRK has elected not to place significant reliance nor weighting on the multiples implied by these transactions, other than for contextual purposes.

It is interesting to note that the implied multiples on a normalised basis are broadly aligned with current implied multiples despite significant changes in the landscape for uranium in Australia since the discovery of large uranium deposits at Ranger, Jabiluka and Koongarra in the early 1970s, the progressive, staged declaration of Kakadu National Park between 1979 and 1991 (or April 1977 in the case of Rundall River [Karlamilyi] National Park at Kintyre), the mid-1990s Jabiluka blockade and changes in community attitudes towards environmental and social governance matters, as well as modern rehabilitation requirements.

Peer Trading analysis

Using the S&P Capital IQ Pro subscription database, SRK also compiled data on listed companies involved in the pre-development to development stage and holding total uranium Mineral Resources in excess of 80 Mlb in contained U₃O₈ (Table 7.6). These companies were analysed according to the stated total Mineral Resource and Ore/Mineral Reserve values on a net attributable basis. All values and implied values are in Australian dollars. The implied values (A\$/lb

U₃O₈) were calculated based on the company's attributable Mineral Resources and Ore Reserves as at the Valuation Date.

It should be noted that this method assumes 100% recovery for the contained U₃O₈ in the Mineral Resource. Importantly, the implied value calculation is for the purpose of this valuation and does not attempt to estimate or reflect the U₃O₈ likely to be recovered from the Mineral Resources as required under the JORC Code (2012).

Importantly, a number of ERA's peers hold exposures to minerals other than uranium.

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Table 7.6: Trading details for peers in the pre-development to development stage and holding >80 Mlb U₃O₈ in Mineral Resources

Company	Code	Mineral Interest Value (A\$ M)	Status	Resource (Mlb U ₃ O ₈)				Grade (U ₃ O ₈)	Resource Multiple (A\$/lb)	
				Meas	Ind	Inf	Total		Ex CP	In CP
Jabiluka			PEA/SS	24	159.2	119	302.3	0.55%		
Lotus Resources Ltd	ASX:LOT	301.8	C&M	3.6	85.0	69.3	157.9	0.04–0.06%	1.91	2.53
Berkeley Energia Ltd	ASX:BKY	91.2	FS	12.3	47.5	29.6	89.3	0.051%	1.02	1.35
Deep Yellow Ltd	ASX:DYL	783.4	FS	81.9	168.8	177.5	428.2	0.021–0.109%	1.83	2.42
Denison Mines Corp	TSX:DML	1,897.3	FS	29.4	102.1	15.8	167.3	0.3–21.8%	11.34	15.03
Laramide Resources Ltd	TSX:LAM/ASX:LAM	178.5	PEA/SS	0.0	43.2	74.9	118.1	0.075–0.23%	1.51	2.00
NexGen Energy Ltd	TSX:NXE/ASX:NXG	4,498.1	FS	209.6	47.1	80.7	337.8	0.83–4.35%	13.32	17.65
Toro Energy Ltd	ASX:TOE	11.1	SS update	7.1	71.0	34.0	112.1	0.032%	0.10	0.13
								Average	4.43	5.87
								Median	1.83	2.42

Sources: LEA and SRK Analysis, 2025

Notes:

Implied mineral interest values have been provided by LEA based on listed company share price with effective date of 27 February 2025 and company reported data.

Ex CP – excluding control premium, In CP – Including control premium. The control premium of 32.5% (midpoint of 30% and 35%) has been applied at the Implied mineral interest value level. Empirical evidence indicates that the average premium paid above the listed market price in successful takeovers in Australia ranges between 30% and 35% based on cash only offers. Scrip offers are typically excluded from such analysis as the value of the scrip consideration can vary materially depending on the date of measurement.

SRK notes that in addition to Denison Mines Corp and NexGen Energy Ltd (included in the table above), the 2022 Grant Thornton Valuation considered the implied values of Fission Uranium Corp and Global Atomic Corporation. SRK considered these companies but notes the following:

- Paladin Energy Limited, a uranium production company, completed the acquisition of Fission Uranium Corp in December 2024 and hence addressed in the preceding section – precedent transaction analysis (corporate entity transactions).
- Global Atomic Corporation holds two business arms: a base metal business comprising a 49% interest in Befesa Silvermet Turkey SL JV, which operates a modern zinc recycling plant in Turkey and a uranium business comprising the Dasa uranium project in Niger, Africa. Dasa has now progressed into the construction phase with two levels developed along the footwall of the orebody, ventilation raises completed and commissioned, processing plant earthworks nearing completion along with civil works underway and the concrete batch plant under construction. Processing equipment such as the semi-autogenous grinding mill shell, crusher and acid plant are on site and a significant percentage of the accommodating housing is now ready for occupation. On this basis, SRK considers the Dasa project to be more advanced than Jabiluka and no longer comparable.

SRK notes that while it considered other peer companies whose most advanced mineral assets were in the production, construction and exploration stages, these were ultimately discounted from further assessment as they were not deemed to be comparable to the prevailing status at Jabiluka MLN1.

SRK notes that according to the VALMIN Code (2015), mineral assets in C&M fall within the Pre-development category.

C&M – care and maintenance; FS – Feasibility Study stage; SS – Scoping Study.

SRK notes that, based on its review of the trading multiples of peer companies holding more than 80 Mlb of contained U₃O₈ in Mineral Resource and at the Development stage, the recent market has been paying (including a control premium) in the range from A\$0.13/lb to A\$17.65/lb U₃O₈ for in situ uranium resources in Africa, Australia and North America (Table 7.6).

Based on its review of the relevant peer company dataset (refer to Appendix C for further details), SRK notes the following:

1. None of the peer companies have mineral assets which are directly comparable to Jabiluka in terms of the combined effects of development status, geological setting, scale, grade or approvals/permitting.
2. SRK considers that companies holding development stage (Scoping/PEA to FS) mineral assets are the most comparable to the current status of Jabiluka (on an unencumbered basis).
3. Analysis of the normalised dataset for assets in the development stage (i.e. PFS/Scoping, PFS completed) indicated the median is A\$2.42/lb U₃O₈, while the average is A\$5.87/lb U₃O₈.
4. Within the development classification, the only companies with a single primary flagship project are NexGenEnergy Ltd and Berkeley Energia Ltd. All other companies have multiple projects/deposits with Denison Mines Corp's mineral asset all located in relative proximity to one another in Saskatchewan, Toro Energy Ltd's assets all located in the Wiluna area of Western Australia while Deep Yellow Ltd and Laramide Resources Corp's mineral assets are geographically spread between Namibia/Australia and USA/Australia, respectively. SRK considers the location and number of projects within each company's portfolio to be important from both a development cost and a corporate funding perspective.
5. NexGen Energy Corp holds a 100% interest in the Rook 1 Project in the Athabasca Basin of Saskatchewan, Canada. Key aspects associated with the Rook development asset which are of relevance to Jabiluka include:
 - a. Both projects remain to be developed and are envisaged to be developed and mined by conventional underground mining and processing techniques.
 - b. The Rook project is supported by Measured, Indicated and Inferred Mineral Resources (same classifications as at Jabiluka), which are of similar overall scale to those at Jabiluka (i.e. 337 Mlb at Rook versus 302 Mlb at Jabiluka).
 - c. However, the defined resource grades at Rook (overall total of 1.88% U₃O₈) are significantly higher than those at Jabiluka (0.55% U₃O₈).
 - d. Rook has a greater proportion of its defined resources in the Measured and Indicated categories (76%) than at Jabiluka (60.5%). In particular, SRK notes that Rook holds 209.6 Mlb U₃O₈ in the Measured category, while at Jabiluka only 23.8 Mlb U₃O₈ is currently assigned to Measured.
 - e. Rook hosts a Probable Reserve of 4.57 Mt averaging 2.37% U₃O₈ for 239.6 Mlb of contained U₃O₈ (inclusive within the defined Mineral Resources), while no Ore Reserves are presently defined at Jabiluka (having been downgraded from Reserves to Resources in 2016).
 - f. The Rook project has been studied to an FS, FEED is ongoing and is approaching financial investment decision (FID) status. Advanced detailed engineering and procurement is

ongoing. This is in contrast to the stalled status at Jabiluka where no technical studies have been completed since 2011.

- g. In contrast to Jabiluka, Rook has substantially completed its environmental and regulatory approvals with both Federal and Provincial technical reviews completed and environmental impact statements accepted. A Federal Environmental Approvals hearing date remains to be set in 2025.
 - h. In contrast to Jabiluka, Rook has received support and advocacy from local indigenous nations in the local priority area.
 - i. In light of these foregoing factors, particularly the grade differential, and more advanced technical and permitting status of Rook, SRK considers that Jabiluka (on an unencumbered basis) would trade at a considerable discount to the multiple implied by NexGen.
6. Berkely Energia Ltd holds a 100% interest in the Salamanca Project in western Spain. Key aspects associated with the Salamanca development asset which are of relevance to Jabiluka include:
- a. Both projects remain to be developed and are currently the subject of ongoing legal action.
 - b. The Salamanca Project is supported by Measured, Indicated and Inferred Mineral Resources (same classifications as at Jabiluka), which are of smaller overall scale to those at Jabiluka (i.e. 89 Mlb U_3O_8 at Salamanca versus 302 Mlb U_3O_8 at Jabiluka).
 - c. However, the defined resource grades at Salamanca (overall total of 0.0514% U_3O_8) are significantly lower than those at Jabiluka (0.55% U_3O_8).
 - d. Salamanca has a similar proportion of its defined resources in the Measured and Indicated categories (67%) to those at Jabiluka (60.5%).
 - e. No Reserves are defined at either project.
 - f. Salamanca has been studied to a Definitive Feasibility Study (DFS) level in 2016, and FEED studies were completed in 2017. These studies envisaged Salamanca would be developed as an open pit mining operation based on three mining areas at Zona 7, Retortillo and Alameda, with heap leaching on each site and centralised processing at Retortillo. This contrasts the envisaged mining and processing at Jabiluka, which was all expected to occur underground to minimise the environmental footprint and improve visual amenity.
 - g. While more than 120 previous permits and positive reports have been granted at a local, federal and European Union Level, the final permit required for the construction of the project was rejected in 2021. The decision remains under appeal and in May 2024, the company filed a request for arbitration before the International Centre for Settlement of Investment Disputes.
 - h. In the meantime, Berkeley Energia Ltd continues exploration activities at its Conchas (lithium, tin, rubidium), Oliva and La Majada Projects in Spain, which are considered prospective for tungsten, cobalt, antimony and other metals.
 - i. In light of these foregoing factors, but particularly the mine type, cost structure, grade and scale differential and ongoing legal action, SRK considers that Jabiluka (on an unencumbered basis) would trade at a premium to the multiple implied by Berkeley Energia Limited.

7. Denison Mines Corp holds interests in several projects in the Athabasca Basin of Saskatchewan, Canada. Key aspects associated with the Denison Saskatchewan mineral assets which are of relevance to Jabiluka include:
- a. All projects remain to be developed and lie in relative proximity to the existing McClean Lake Mill, with Denison's projects predominantly envisaged to be developed using in situ recovery (ISR) and conventional underground mining methods. Although technically challenging, ISR methods are typically significantly lower cost relative to conventional mining methods.
 - b. Denison's flagship asset is the 95% owned Wheeler River Project, which is advancing to FID having completed its FS for Phoenix ISR in 2023 and the Gryphon underground PFS update in 2023.
 - c. In addition, Denison holds a 22.5% interest in the McClean Lake Mill, a fully licenced mill with 24 Mlb annual capacity, which is able to support new sources of supply along with toll treating uranium ores from Cigar Lake under a toll milling agreement. At the McClean Lake mine, Denison is targeting a mining restart in 2025, using the wholly owned and patented SABRE (Surface Access Borehole Resource Extraction) mining method.
 - d. At its Midwest project, Denison holds a 25.17% interest in two high-grade deposits (Midwest Main and Midwest A) in proximity to the McClean Lake Mill, which have been the subject of recent ISR field tests and are being progressed towards PEA studies, and are supported by approved environmental impact statements.
 - e. At the 69.44% owned Waterbury Lake Project, Denison completed a PEA in 2020 investigating the potential economic outcomes associated with an ISR operation.
 - f. Proven and Probable Reserves are held by Denison at McClean (ore stockpiles), Phoenix and Gryphon (Probable Reserves only). Noting that Mineral Resources are inclusive of Mineral Reserves, Denison also reports Measured Resources at Phoenix, Indicated Resources at Phoenix, Gryphon, McClean, Midwest and Waterbury, as well as Inferred Resources at Phoenix, Gryphon, McClean, Midwest, Waterbury and Christie Lake.
 - g. Collectively, the defined Mineral Resources held by Denison are smaller in scale (167.3 Mlb U_3O_8) than at Jabiluka (302 Mlb U_3O_8), but the reported grade of Denison's Mineral Resources is significantly higher (2.06% U_3O_8) than the Measured, Indicated and Inferred Resources at Jabiluka (0.55% U_3O_8).
 - h. Denison has a higher proportion of its defined resources in the Measured and Indicated categories (78.6%) to those at Jabiluka (60.5%).
 - i. After successfully completing the technical review phase of the Federal Environmental Authority approval process, Denison has filed the final EIS for Wheeler River with both the provincial and federal regulators in October/November 2024, respectively.
 - j. Denison has also been notified that it has successfully completed the requirements to obtain a licence to prepare and construct a uranium mine and mill, which allows for the federal regulators to make a licensing decision concurrently with the Environmental Authority approval process.
 - k. In light of these foregoing factors, but in particular the grade differential and cost profile along with the existing mill and intellectual property held by Denison, SRK considers that

Jabiluka (on an unencumbered basis) would trade at a considerable discount to the multiple implied by Denison.

8. Toro Energy Limited holds a 100% interest in several projects in the Wiluna area of Western Australia. Key aspects associated with the Wiluna Project which are of relevance to Jabiluka include:
 - a. Toro's Wiluna Project consists of the Centipede, Millipede, Lake Maitland, Lake Way uranium deposits, while the Dawson Hinkler (satellite to Wiluna), Theseus and Nowthanna deposits remain in the exploration stage.
 - b. The Wiluna Project is supported by Measured, Indicated and Inferred Mineral Resources (same classifications as at Jabiluka), which are of smaller overall scale to those at Jabiluka (i.e. 112.7 Mlb U₃O₈ at Wiluna versus 302 Mlb U₃O₈ at Jabiluka). The Wiluna Project also includes appreciable contained vanadium (89.3 Mlb V₂O₅).
 - c. However, the defined resource grades held by Toro (overall total of 0.055% U₃O₈) are significantly lower than those at Jabiluka (0.55% U₃O₈).
 - d. Toro has a slightly higher proportion of its defined resources in the Measured and Indicated categories (69%) to those at Jabiluka (60.5%).
 - e. Most recently, Wiluna has been the subject of an updated Lake Maitland scoping study in June 2024 and re-optimisation studies in February 2025, based on mining via shallow open pit methods with standalone mining and processing operations at Lake Maitland. This standalone option is just one of the potential development scenarios that Toro is exploring for commercialisation, with further upside potentially resulting from incorporation of Centipede-Millipede, Lake Way and Dawson Hinkler deposits.
 - f. In July 2017, the Wiluna Uranium Project received federal and state government environmental approvals for mining uranium at the Centipede, Lake Way, Millipede and Lake Maitland deposits, the construction of a processing facility and all mine and processing related infrastructure, TSFs and finished product transport to port. However, the date for substantial commencement condition contained in the State environmental approval has now passed. Toro has sought advice to confirm that the environmental approval will remain valid and that it is able to apply for an extension of time.
 - g. Toro has proposed the demerger of its 100% interests in the Dusty nickel project and Yandal gold/base metal project in the Wiluna area of Western Australia.
 - h. In light of these foregoing factors, but particularly the grade and scale differentials, SRK considers that Jabiluka (on an unencumbered basis) would trade at a premium to the multiple implied by Toro.
9. Deep Yellow Limited holds interests in Namibia and Australia, with its flagship project being the Tumas Project in Namibia, closely followed by the Mulga Rock Project in Western Australia. Key aspects associated with Deep Yellow's project portfolio which are of relevance to Jabiluka include:
 - a. Deep Yellow holds two long-life advanced uranium projects within well regarded mining jurisdictions which have been both studied to FS level and are anticipated to be developed sequentially.

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- b. In the case of the Tumas Project, FID which was expected in late 2024, has now been deferred until March 2025 due to delayed detailed engineering costings and further project optimisation. Early works on non-process infrastructure (i.e. power, water, roads, etc.) are continuing. Deep Yellow expects to commence commercial production from Tumas in the second half of 2026.
 - c. At Mulga Rock, a revised definitive feasibility study commenced in 2024. Currently work is ongoing on the revision of the mining model following a recent Mineral Resource update, metallurgical testwork drilling, long-term pumping tests, and a mini-pilot metallurgical testwork program.
 - d. In addition to these two projects Deep Yellow holds a prospective exploration portfolio centred on the Alligator River region of the northern Territory, Australia and at Omahola in Namibia.
 - e. Collectively, the defined Mineral Resources held by Deep Yellow are larger in scale (428.2 Mlb U₃O₈) than at Jabiluka (302 Mlb U₃O₈), but the reported grade of Deep Yellow's Mineral Resources is significantly lower (0.03% U₃O₈) than the Measured, Indicated and Inferred Resources at Jabiluka (0.55% U₃O₈).
 - f. In terms of geographic distribution of its defined Mineral Resources, Deep Yellow holds 290.5 Mlb U₃O₈ in Namibia (with average grade of 0.02% U₃O₈) and 137.7 Mlb U₃O₈ in Australia (with average grade of 0.05% U₃O₈).
 - g. Deep Yellow has a similar proportion of its defined resources in the Measured and Indicated categories (58.6%) to those at Jabiluka (60.5%).
 - h. At a 150 ppm U₃O₈ cut-off grade, Deep Yellow holds Proved and Probable Reserves of 67.3 Mlb U₃O₈ at 0.035% U₃O₈ at Tumas in Namibia and 109.6 Mlb U₃O₈ at 0.045% U₃O₈ at Mulga Rock.
 - i. Tumas also offers the potential for vanadium by-product credits.
 - j. The development pathway for both Tumas and Mulga Rock envisages conventional open pit mining and processing using beneficiation, leaching and uranium (vanadium) recovery.
 - k. Tumas is held under a granted Mining Licence following the submission and approval of an environmental impact assessment and environmental management plan in 2023. Mulga Rock has also received environmental and mining approval through various Western Australian and Federal Government approval processes.
 - l. In light of these foregoing factors, in particular the U₃O₈ grade differential, coherent nature (i.e. single deposit) and scale of the Jabiluka mineralisation, SRK considers that Jabiluka (on an unencumbered basis) would trade on at a premium to the multiple implied by Deep Yellow.
10. Laramide Resources Limited holds interests in several projects in Utah and New Mexico in the United States and the Northern Territory and Queensland, Australia. Key aspects associated with Laramide's projects which are of relevance to Jabiluka include:
- a. Laramide's material projects are predominantly advanced uranium projects in districts with historical production or perceived geological prospectivity. These include the La Jara Mesa, Churchrock and Crownpoint projects in the Grants Mineral Belt of New Mexico, La Sal Project in Utah and the Westmoreland project in Queensland.

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- b. To date, no Measured Resources have been defined within Laramide's projects, while Indicated Mineral Resources have been defined at the La Jara Mesa and Westmoreland projects, while the Churchrock and Crownpoint projects contain only Inferred Resources. A historical resource is defined at the La Sal Project.
 - c. Collectively, Laramide's defined Mineral Resource position is of smaller overall scale to those at Jabiluka (i.e. 118.1 Mlb U₃O₈ versus 302 Mlb U₃O₈ at Jabiluka) and of combined lower grade (0.09% U₃O₈) relative to Jabiluka (0.55% U₃O₈). The Churchrock (50.8 Mlb U₃O₈) and Westmoreland (52 Mlb U₃O₈) projects host the largest Mineral Resource positions within Laramide's portfolio.
 - d. The Churchrock – Crownpoint and Westmoreland projects have been studied to PEA level, with Churchrock envisaged to be mined via ISR extraction, while La Sal, La Jara Mesa, Crownpoint and Westmoreland expected to be developed by conventional open pit techniques.
 - e. La Sal is a legacy project based on a small scale historical underground mine. At La Sal, Laramide is currently negotiating offtake and processing with a view towards re-opening of the historic mine.
 - f. Recent work at La Jara Mesa has centred on the permitting process which had previously been paused due to unfavourable economic conditions in 2012. This involved recommencing the review process for the draft EIS (originally published in May 2012). A mine permit application was also submitted in July 2024. Laramide's current focus at La Sal Mesa is permitting and initial site development works.
 - g. The Crownpoint project dates back to the late 1960s and includes mine development (surface facilities and two ventilation shafts). Recent work at Churchrock - Crownpoint related to the January 2024 PEA with further work required on an aquifer restoration study, final permit and construction. The US Nuclear Regulatory Commission has granted a license for production of uranium from sections of both projects and approved the construction of a central processing plant at Crownpoint.
 - h. Westmoreland was studied to PEA level in 2016. More recent work at Westmoreland has focussed on drill testing of various greenfield targets at the Amphitheatre, Huarabagoo and Junnagunna targets, as well as established targets at the Southern Comfort-Megeera trend and Long Pocket to grow the defined Mineral Resource base. An updated Mineral Resource estimate is expected for Westmoreland in early 2025, with next steps to include pre-feasibility study EIS and mine studies.
 - i. Laramide also applied for a Mineral Development Licence at Westmoreland.
 - j. In addition, Laramide has an option to acquire Aral Resources, a Kazakh corporation with 22 mineral licences comprising the Chu-Sarysu project in the Suzak district of Southern Kazakhstan and considered to offer ISR mining potential.
 - k. In light of these foregoing factors, in particular the grade and scale differentials and associated cost profile, SRK considers that Jabiluka (on an unencumbered basis) would trade at a premium to the multiple implied by Laramide.
11. Lotus Resources Limited holds a 100% interest in the Letlhakane Project in Botswana and an 85% interest in the Kayelekera Project in Malawi. Key aspects associated with Lotus' project portfolio which are of relevance to Jabiluka include:

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- a. Kayelekera is a brownfields project with existing plant and infrastructure that has been on care and maintenance (i.e. at a pre-development level according to VALMIN Code definitions) since 2012. Lotus recently completed a FEED program designed to accelerate the restart of open pit mining and processing operations at Kayelekera. To this end, Lotus has ordered key long lead items, mobilised equipment and construction crews to site and completed early works.
 - b. The Kayelekera mining licence remains valid until 2037, and the environmental and social impact assessment is currently being renewed and targets re-approval in April 2025. In January 2025, Lotus signed a community development agreement ensuring the rights, customs and traditions of local communities. Lotus has commenced a series of initial engagements with regulatory authorities to finalise arrangements for an expedited approval process at Kayelekera.
 - c. In December 2024, Lotus' Board approved the FID for the Kayelekera accelerated restart project. First production is envisaged to occur in the third quarter of 2025.
 - d. The bulk of Lotus' defined Mineral Resource base is contained within the Letlhakane Project in Malawi, which has been evaluated to scoping study level with optimisation studies currently underway to define a pathway to pre-feasibility. The project is supported by its proximity to major existing infrastructure (roads, rail and power) and a granted mining licence, water abstraction rights and provisional surface rights.
 - e. Collectively, Lotus' defined Mineral Resource position is of smaller overall scale to those at Jabiluka (i.e. 157.9 Mlb U_3O_8 versus 302 Mlb U_3O_8 at Jabiluka) and of combined lower grade (0.039% U_3O_8) relative to Jabiluka (0.55% U_3O_8). Kayelekera is supported by Measured, Indicated and Inferred Resources of 46.3 Mlb U_3O_8 at 0.05% U_3O_8 , while Letlhakane contained Indicated and Inferred Resources of 113.7 Mlb U_3O_8 at 0.036% U_3O_8 . A small Inferred Resources is also outlined at the Livingstonia Project. Kayelekera also has a Proved and Probable Reserve of 23.0 Mlb U_3O_8 at 0.066% U_3O_8 .
 - f. Lotus has a slightly lower proportion of its defined resources in the Measured and Indicated categories (56.19%) to those at Jabiluka (60.5%).
 - g. Both projects are expected to be developed by conventional open pit mining and processing techniques. However, Lotus continues to evaluate the potential for ISR at Letlhakane.
 - h. In light of these foregoing factors, but particularly the grade and scale differentials and differing geopolitical profile, SRK considers that Jabiluka (on an unencumbered basis) would trade at a premium to the multiple implied by Lotus.
12. While SRK notes that most recent cost estimates for Jabiluka date back to 2011 (as part of the OoM update of 2007 costings) and hence are no longer relevant, the following cost profile for each of these companies are presented in Table 7.7. As a general observation, it is evident that lower cost projects are associated with higher implied multiples within the peer trading dataset, while the opposite is true for higher cost projects.

Table 7.7: Peer Company cost profiles

Company	Quoted Accuracy	OPEX		CAPEX		TOTAL (LOM)	
		(A\$M)	(A\$/lb U ₃ O ₈)	(A\$M)	(A\$/lb U ₃ O ₈)	(A\$M)	(A\$/lb U ₃ O ₈)
Lotus – Letlhakane (2015 PEA)	NA	7,259	63.84	497.5	4.38	7,757	68.22
Berkeley – Salamanca (2016 DFS)	±10%	2,181	24.43	597	6.68	2,778	31.11
Laramide – Westmoreland (2016 SS)	±25%	1,919	36.98	557	10.74	2,476	47.72
Deep Yellow – Mulga (2020 DFS)	NA	4,328	41.30	624	5.95	4,952	47.25
NexGen Energy – Rook (2021 FS)	±15%	2,842	8.42	1,924	5.70	4,766	14.12
Denison Mines Corp – Wheeler (2023 FS)	-15% to +25%	1,760	14.61	1,190	9.88	2,950	24.49
Lotus – Kayelekera (2024 FS)	±10% to 15%	2,182	47.12	73.9	1.60	2,256	48.72
Toro – Wiluna (2024 SS)	-25% to +35%	2,637	35.83	270	3.67	2,907	39.5

Source: SRK Analysis, 2025

Note: All quoted amounts are real and converted into A\$ terms at a C\$A\$ exchange rate of 0.70 and A\$:US\$ exchange rate of 0.63.

SRK suggests that the totalled OPEX and CAPEX sum, in A\$/lb, are for projects that vary significantly in size and estimated project length.

OPEX – operating costs, CAPEX – Capital costs, including initial capital, sustaining capital and closure costs, NA – not available, DFS – Definitive feasibility study, FS – Feasibility study, SS – Scoping study, PEA – Preliminary economic assessment.

NexGen's Rook and Denison's Wheeler River Projects are both underground operations employing long hand open stope extraction mining methods, while all other mines are open pit.

Based on its consideration of the foregoing factors relating to Peer Trading multiples, SRK considers that the market would pay in the range of A\$2.00/lb U₃O₈ to A\$4.40/lb U₃O₈ for a 100% interest in the Jabiluka Mineral Resources (on an unencumbered basis). This range is informed by:

- **Low end of range** – the implied multiple for Deep Yellow and Lotus (modified to account for SRK's view that Jabiluka was likely to trade at a premium to these values).
- **High end of range** – broadly aligned with the average value of the Development grouping²⁴ (along with SRK's view that Jabiluka was likely to trade at a considerable discount to the implied multiples for Denison and NexGen but at a premium to those of Lotus and Deep Yellow).

To this end and in dividing this value range between the three Mineral Resource categories, SRK has elected to adopt a common overall increment of A\$0.80/lb U₃O₈. In so doing, SRK has assigned the following multiples for valuation purposes as implied by its analysis of Peer trading

²⁴ To reflect that a majority of the peers (outside of Denison and NexGen) hold uranium resources which are at a lower grade than at Jabiluka.

multiples: Measured Resources A\$3.60/lb U₃O₈ to A\$4.40/lb U₃O₈, Indicated Resources – A\$2.80 to A\$3.60/lb U₃O₈ and Inferred Resources – A\$2.00/lb U₃O₈ to A\$2.80/lb U₃O₈.

7.5.2 Exploration Potential

In addition to the Mineral Resource transaction multiples, SRK has also compiled a list of recent (2018–25) transactions involving broadly similar early to advanced stage Australian uranium exploration projects without defined Mineral Resources. This dataset has then been used to support its assessment of the Market Value of the exploration potential associated with ERA's mineral assets. SRK's analysis of the implied multiples (Appendix B) was based on the reported areal extent of mineral tenure as described in the earlier sections of this Report.

The implied transaction multiples for exploration potential are expressed in A\$/km² terms. The implied multiples are calculated using the transaction value (at the implied 100% acquisition cost) and the total area of all tenure. The implied transaction multiple was then normalised to the U₃O₈ price as at the date of the valuation.

In total, 22 transactions were considered for further analysis, with the following implied multiples (Table 7.8).

Table 7.8: Statistics for Australian and NT Projects (A\$/km²)

Parameter	Northern Territory only		All Australia		All Australia (excl. outliers)	
	Raw (A\$/km ²)	Normalised (A\$/km ²)	Raw (A\$/km ²)	Normalised (A\$/km ²)	Raw (A\$/km ²)	Normalised (A\$/km ²)
Count	9	9	22	22	22	22
Minimum	8.6	7.5	8.6	7.5	200.0	177.7
Average	755.8	1,934.9	17,643.9	33,560.3	1,343.1	2,056.6
Median	658.4	760.5	479.4	872.1	556.6	983.6
Maximum	2,242.3	8,489.5	158,750.0	298,352.0	9,333.0	8,494.0
Weighted average	1,146.5	3,399.0	1,283.2	2,744.2	962.1	2,170.7
25th percentile	22.5	20.0	256.8	223.6	336.7	370.0
75th percentile	1,289.3	2,188.9	1,572.5	3,338.9	1,302.6	1,907.5
90th percentile	1,501.1	4,675.7	58,366.2	154,551.8	2,008.6	6,582.6

Source: SRK Analysis, 2025

Note: Normalised to February 2025 averaged daily uranium price

In reviewing the transaction dataset, SRK notes the following:

1. None of the precedent transactions involve mineral assets that are directly comparable to Jabiluka or Coopers Creek in terms of the combined effects of development status, geological setting, scale, grade or approvals/permitting.
2. Transactions involve early to advanced stage uranium exploration tenures (without defined Mineral Resources in South Australia (10), Queensland (3) and the Northern Territory (9)).
3. A majority of transactions within the dataset relate to exploration tenures, with the only exception being the Ben Lomond Project which comprises two granted mining leases covering 21.6 km².
4. Temporally the closest transaction to the current valuation date is Core Energy's earn-in agreement with R and B Resources Pty Ltd (at Cummins) and Harris Belt Holdings Pty Ltd (at Harris Greenstone) in South Australia dated 24 January 2025.
5. Spatially the closest mineral assets to ERA's tenures are those of the Alligator River uranium field as acquired by Vimy Resources Limited from Cameco Corporation on 1 March 2018.
6. In terms of tenure size (in km² terms), the majority of projects within the dataset are typically larger than Jabiluka (72.75 km²), but comparable to Copper Creek (810.24 km²), in part reflecting they only convey exploration rights.

Based on its analysis, SRK considers the recent market has been paying in the order of A\$500/km² to A\$2,500/km² for early-stage uranium exploration projects in the Northern Territory. Strategically located or more advanced exploration tenures are likely to trade at higher multiples.

7.6 Valuation of Mineral Resources

7.6.1 Jabiluka

Instructions

In order to fully consider the range of potential outcomes regarding the Market Value of the Jabiluka Project, LEA has requested SRK to consider two valuation scenarios, these being:

- a) *An unencumbered value of MLN1 – in particular, unencumbered by the Renewal Decision and Traditional Owner consent, and thus prior to the change to no longer recognise a Mineral Resource for MLN1*
- b) *An 'as is' opinion on the value of MLN1, reflecting encumbrances arising from the Renewal Decision and position of the Traditional Owners and, if considered appropriate, the circumstance that ERA no longer recognises a Mineral Resource for MLN1."*

Assumptions – Unencumbered value

In considering the unencumbered scenario, SRK has assumed the following (some of which are special assumptions²⁵):

- The Measured, Indicated and Inferred Mineral Resource as previously reported by ERA in its 2023 Annual Report as outlined in Table 4.3.
- Further technical studies and modelling are required to demonstrate practical feasibility and economic viability of mining the Jabiluka II deposit within MLN1 prior to any future development or mining.
- MLN1 is granted for a term of up to 10 years (and potentially extendable beyond this timeframe).
- The Traditional Owners duly consent to the development and future mining of the Jabiluka II deposit.
- The Commonwealth and NT duly authorise the development and future mining of the Jabiluka II deposit.
- All parties would readily agree terms to enable a transaction to complete.

Assumptions – Encumbered value

In considering the encumbered scenario, SRK has assumed the following:

- ERA's decision to longer report the Mineral Resources as outlined in Table 4.3, as announced to the ASX on 26 March 2025 (effective 31 December 2024).
- Further technical studies and modelling are required to demonstrate practical feasibility and economic viability of mining the Jabiluka II deposit within MLN1 prior to any future development or mining.
- Having been rejected by the NT Government on advice from the Commonwealth Government, the renewal of MLN1 remains in statutory limbo pending Court orders.
- The Traditional Owners remain strongly opposed to any future development and/or mining of the Jabiluka II deposit.
- ERA and Rio Tinto remain committed to not undertaking any development and/or mining of the Jabiluka II deposit without the consent of Traditional Owners in accordance with the LTCMA.
- ERA remains responsible for the ongoing rehabilitation and security of the Jabiluka MLN1.
- The NT Government has gazetted a reservation (which excludes any form of mineral tenure and future exploration /extraction of minerals) pertaining to the entire area covered by MLN1, which comes into effect upon the expiry of MLN1
- The Commonwealth Government has made public statements that it has commenced the incorporation of the Jabiluka site into Kakadu National Park.

²⁵ Special assumptions are defined by the International Valuation Standards (IVS) as 'an assumption that assumes facts that differ from the actual facts existing at the valuation date'.

- It remains to be determined whether the Commonwealth and/or NT governments would authorise any future development or mining of the Jabiluka II deposit pending an application to do so.
- It remains to be determined if all parties (including Traditional Owners, Commonwealth and NT governments and other stakeholders) would agree terms to enable a transaction to complete.

7.6.2 Part A: Unencumbered value of Jabiluka MLN1 prior to the change to no longer recognise a Mineral Resource

Value Determination – Precedent Transaction Analysis (mineral assets)

In relation to the unencumbered value of Jabiluka, SRK has considered the Mineral Resources by their classification and location. Based on precedent transaction analysis – in the context of development stage resource size (in contained U₃O₈ terms), mine type and the presence of historical workings – and the current market sentiment for uranium projects in Australia and globally, SRK considers that the current market would pay in the order of A\$4.00/lb U₃O₈ to A\$4.80/lb U₃O₈ for Measured Resources, A\$3.20/lb U₃O₈ to A\$4.00/lb U₃O₈ for Indicated Resources and A\$2.40/lb U₃O₈ to A\$3.20/lb U₃O₈ for Inferred Mineral Resources at Jabiluka (as set out in Section 7.5.1 Precedent Transaction Analysis mineral assets).

This view regarding the implied value range is based on the values implied by the transaction dataset for scoping/pre-feasibility level projects (excluding Ben Lomond), in particular the average and percentiles (90th) values (refer Table 7.3 and Appendix B). SRK notes that this is a subjective assessment, based on SRK's analysis of the data from the likely range that best represents the implied value range according to recent transaction data. SRK's analysis has also allowed for the specific technical factors impacting on Jabiluka including, but not limited to, the tonnage, grade and location of the defined mineralisation, status of investigations to validate future mining scenarios, proximity to established processing infrastructure, potential cost structure and likely timing associated with future extraction.

Applying these multiples to the estimated pounds of U₃O₈ contained in Jabiluka's defined Mineral Resources as outlined in Table 4.3 results in the derived values shown in Table 7.9.

Table 7.9: Jabiluka Mineral Resources – Unencumbered Basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Measured	4.00	4.80	23.8	95.2	114.3
	Indicated	3.20	4.00	159.2	509.4	636.7
	Inferred	2.40	3.20	119.0	285.7	381.0
	Total			302.3	890.3	1,131.9
	<i>Implied A\$/lb U₃O₈ in Resource (average)</i>				2.95	3.75

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Value Determination – Precedent Transaction Analysis (corporate entities)

In relation to the unencumbered value of Jabiluka, SRK has considered precedent transactions at a corporate level involving projects with defined Mineral Resources. These Mineral Resources have been considered by their classification and location. Based on precedent transaction analysis involving corporate entities, SRK considers that the current market would pay in the order of Measured Resources A\$3.40/lb U₃O₈ to A\$4.00/lb U₃O₈, Indicated Resources – A\$2.80/lb U₃O₈ to A\$3.40/lb U₃O₈ and Inferred Resources – A\$2.20/lb U₃O₈ to A\$2.80/lb U₃O₈ (on an unencumbered basis, as set out in Section 7.5.1 Precedent Transaction Analysis corporate entities).

This view regarding the implied value range is based on the values implied by Fission Uranium, UEX Corp and Vimy Resources, in particular the median (of the raw dataset) and median and average of the normalised dataset (refer Table 7.5 and Appendix B.2). SRK notes that this is a subjective assessment based on SRK’s analysis of the data from the likely range that best represents the implied value range according to recent transaction data. SRK’s analysis has also allowed for the specific technical factors impacting on Jabiluka including, but not limited to, the tonnage, grade and location of the defined mineralisation, status of investigations to validate future mining scenarios, proximity to established processing infrastructure, potential cost structure and likely timing associated with future extraction.

Applying these multiples to the estimated pounds of U₃O₈ contained in Jabiluka’s defined Mineral Resources as outlined in Table 4.3 results in the derived values shown in Table 7.10.

Table 7.10: Jabiluka Mineral Resources – Unencumbered basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Measured	3.40	4.00	23.8	81.0	95.2
	Indicated	2.80	3.40	159.2	445.7	541.2
	Inferred	2.20	2.80	119.0	261.9	333.3
	Total			302.3	788.5	969.8
	<i>Implied A\$/lb U₃O₈ in Resource (average)</i>					2.61

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Value Determination – Peer Trading Analysis

Adopting the same unencumbered basis as outlined above but using peer trading analysis, SRK considers that the current market would pay in the order of A\$3.60/lb U₃O₈ to A\$4.40/lb U₃O₈ for Measured Resources, A\$2.80/lb U₃O₈ to A\$3.60/lb U₃O₈ for Indicated Resources and A\$2.00/lb U₃O₈ to A\$2.80/lb U₃O₈ for Inferred Mineral Resources at Jabiluka (as set out in Section 7.5.1, Peer Trading Analysis).

Applying these multiples to the estimated pounds of U₃O₈ contained in the defined Mineral Resources as outlined in Table 4.3 results in the derived values shown in Table 7.11.

Table 7.11: Jabiluka Mineral Resources – Unencumbered basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Measured	3.60	4.40	23.8	85.7	104.8
	Indicated	2.80	3.60	159.2	445.7	573.0
	Inferred	2.00	2.80	119.0	238.1	333.3
	Total			302.3	769.5	1011.1
	<i>Implied A\$/lb U₃O₈ in Resource (average)</i>				2.55	3.35

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Summary – Unencumbered Value of Jabiluka Mineral Resource

SRK's aim in determining the unencumbered value of the Jabiluka defined Mineral Resources has been to present to LEA and investors in ERA, a valuation relating to the future development of the Jabiluka Project, which is unconstrained by regulatory and stakeholder issues, such that the in situ value of the defined Mineral Resource can be taken into account by LEA as part of its assessment of the Market Value of ERA shares. Table 7.12 presents the outcome of this analysis.

Table 7.12: Summary – Unencumbered Value of Jabiluka Mineral Resources

Valuation Method	Unencumbered Value (A\$M)	
	Low	High
Precedent Transactions – mineral assets	890.3	1,131.9
Precedent Transactions – entities	788.5	969.8
Peer Trading	769.5	1,011.1
Selected	816.1	1,037.6
<i>Implied multiple (A\$/lb U₃O₈) in Mineral Resource (average)</i>	2.70	3.43

Source: SRK analysis

Note: Any discrepancy between table values is due to rounding.

7.6.3 Part B: Encumbered value of Jabiluka MLN1 after the change to no longer recognise a Mineral Resource

In considering the encumbered value attributable to Jabiluka MLN1 following ERA's decision to no longer report any Mineral Resources (as announced to the ASX on 26 March 2025), SRK notes that the decision was the product of the tenure renewal decision and ongoing opposition by the Mirarr People to future project development.

SRK completed an internal poll of its resource geologist involved in reporting of Mineral Resources to better understand the value implications of ERA's decision. Based on this poll, it is evident that there are two schools of thought in how ERA's decision should be treated and used as the basis for valuation. These can be summarised as:

- Top-down view:** Risk-weight adjustment to the defined Measured, Indicated and Inferred Resources at Jabiluka given such resources were reported by ERA up until 26 March 2025 (effective date for Resource estimate 31 December 2024). This reflects the view that the mineralisation remains reasonably well defined and in place. It also acknowledges that the ERA and the Competent Person continue to regard Jabiluka as holding inherent value as noted in their statement ‘While the Competent Person considered it realistic at the time that all or part of the Mineral Resources may eventually be reclassified as Proven or Probable Reserves, this outcome is not guaranteed’ at pages 77 and 78 of ERA’s 2024 annual report (released to the ASX dated 26 March 2025). To estimate the value under this view, the multiples for an Inferred Resource were discounted by 50%, and then applied to all defined Resource categories. SRK note that this discount is based on that typically applied by SRK (and in many cases by other mineral asset practitioners) when evaluating the value associated with Exploration Targets as defined in Clause 17 of the JORC Code (2012).
- Bottom-up view:** Based on a literal interpretation of the JORC Code which notes that to publicly report Mineral Resources, practitioners must be able to demonstrate ‘reasonable prospects for eventual economic extraction (i.e. more likely than not)’ RPEEE prevails. ERA’s, and previously, Rio Tinto’s, decision to no longer report Mineral Resources implies that the defined mineralisation at Jabiluka is unable to demonstrate RPEEE and despite known mineralisation being evident, realistic mining parameters (including the sourcing of associated approvals) and a development pathway are unable to be demonstrated within the foreseeable future. This implies the project should be relegated to only consideration of the exploration potential associated with the project. In doing so, SRK has adopted a geoscientific rating method and cross-checked this with a select form of the precedent transaction method.

Top-Down View

Value Determination – Precedent Transaction Analysis (mineral assets)

Application of a 50% discount to the precedent mineral asset transaction multiples for an Inferred Resource (A\$2.40/lb U₃O₈ to A\$3.20/lb U₃O₈ as set out in Section 7.5.1 Precedent Transaction Analysis mineral assets) derives a range of between A\$1.20/lb U₃O₈ to A\$1.60/lb U₃O₈.

Applying these multiples to the estimated pounds of U₃O₈ contained at Jabiluka MLN1 (based on previously defined Mineral Resources) results in the derived values shown in Table 7.13.

Table 7.13: Jabiluka MLN1 – Encumbered Basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Historical estimate	1.20	1.60	302.3	362.4	483.3

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Value Determination – Precedent Transaction Analysis (corporate entities)

Application of a 50% discount to the precedent corporate transaction multiples for an Inferred Resource (A\$2.20/lb U₃O₈ to A\$2.80/lb U₃O₈ as set out in Section 7.5.1 Precedent Transaction Analysis corporate entities) derives a range of between A\$1.10/lb U₃O₈ to A\$1.40/lb U₃O₈.

Applying these multiples to the estimated pounds of U₃O₈ contained at Jabiluka MLN1 (based on previously defined Mineral Resources) results in the derived values shown in Table 7.14.

Table 7.14: Jabiluka MLN1 – Encumbered basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Historical estimate	1.10	1.40	302.3	332.2	422.8

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Value Determination – Peer Trading Analysis

Application of a 50% discount to the precedent corporate transaction multiples for an Inferred Resource (A\$2.00/lb U₃O₈ to A\$2.80/lb U₃O₈ as set out in Section 7.5.1, Peer Trading Analysis) derives a range of between A\$1.00/lb U₃O₈ to A\$1.40/lb U₃O₈.

Applying these multiples to the estimated pounds of U₃O₈ contained at Jabiluka MLN1 (based on previously defined Mineral Resources) results in the derived values shown in Table 7.15.

Table 7.15: Jabiluka MLN1 – Encumbered basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Historical estimate	1.00	1.40	302.3	302.0	422.8

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Bottom-up View

In seeking to cross-check the values implied by the top-down view as discussed above, SRK has considered the implied multiple associated with a recent transaction offering comparability to Jabiluka MLN, as well as the geoscientific rating method.

In doing so, SRK has had to exercise a degree of judgement regarding the comparability of the assets. In doing so, SRK notes that there are other known mineral deposits and prospects within the Jabiluka MLN1, including Jabiluka I.

Select form of the precedent transaction method

As noted above, SRK has considered the implied multiples associated with a recent transaction involving Australian uranium transactions relating to a historical resource. In this instance, SRK

considers its selected multiples derived using this particular transaction incorporates value which is attributable to exploration prospectivity and potential upside scenarios. SRK notes that these transactions involve assets that are considered as being constrained, as at the time of these transactions (and persisting to the current day) uranium mining is not permitted in Queensland.

SRK notes the transactions of Consolidated Uranium Inc. in 2020 and 2022 relating to the Ben Lomond Project in Queensland. These are reasonably aligned to Jabiluka for the following reasons:

- Ben Lomond experiences a tropical climate with periods of heavy rainfall and cyclonic storms similar to that at Jabiluka.
- Unlike the relatively remote location at Jabiluka, the Ben Lomond deposit lies 50 km southwest of Townsville in central coastal Queensland.
- Ben Lomond is the only transaction within the available transaction dataset relating to granted mining leases. Ben Lomond comprises two granted mining leases covering a combined area of 21.6 km² (which is smaller than the Jabiluka MLN1 at 72.75 km²).
- The known volcanogenic unconformity related uranium mineralisation at Ben Lomond is moderate to high-grade (+0.2% U₃O₈ versus 0.55% U₃O₈ as previously defined at Jabiluka), albeit relatively small in scale (approximately 11 Mlb of contained uranium versus approximately 300 Mlb as previously defined at Jabiluka) and includes considerable molybdenum – fluorine (versus gold at Jabiluka). The known mineralisation at Ben Lomond is interpreted to remain open to the east over at least a 1 km strike length.
- The Ben Lomond project was the subject of a Canadian National Instrument 43-101 technical report dated 16 July 2005. At that time, the deposit was reported to comprise an Indicated and Inferred Resource of 10.7 Mlb U₃O₈ at 0.25% U₃O₈ under the JORC Code (2004) which had not been updated to JORC Code 2012 compliance at the time of the transaction. At the time of the 2020 and 2022 transactions, this estimate was considered to be a historical estimate under NI 43-101 standards as insufficient work had been done by the Qualified Person to classify the historical estimate as current mineral resources. As a result, the historical estimate was not being treated as a current mineral resource.
- The Ben Lomond project was discovered in 1975 and evaluated over a prolonged period culminating various technical studies designed to support a prefeasibility study in 2012. During this time, limited exploratory underground workings were developed for metallurgical bulk testing purposes via adits between 1976 and 1982. In total, 36 t of uranium ore was reportedly extracted.
- Ben Lomond has previously been subject to technical studies designed to advance the project to a PFS level. These studies envisaged extraction by open pit (70% of the total) and by underground mining. In 2016, an environmental protection order was issued in respect of the project pending implementation of certain rehabilitation measures. In December 2017, an environmental authority was granted by Queensland authorities to allow the proposed PFS work to proceed.
- Like Jabiluka, Ben Lomond has never been a fully operational mine despite being historically disturbed. The mine was granted mining leases prior to the completion of an environmental impact statement. Since 1984, the site has been on care and maintenance.

- There is ongoing community and governmental opposition to redevelopment of the Ben Lomond mine site. Various Aboriginal sites are reported within the surrounding area to the project.
- Uranium mining is banned in Queensland and hence there was no viable pathway to production as at either the 2020 and 2022 transaction dates.

Accordingly, SRK has elected to assign multiple in the order of A\$0.50/lb to A\$1.10/lb U₃O₈ to estimated pounds of U₃O₈ contained within the Jabiluka MLN1 (based on previously defined Mineral Resources). This multiple is aligned with the implied multiples for the Ben Lomond transactions (which range from A\$0.48/lb to A\$1.12/lb U₃O₈ on a normalised but encumbered²⁶ basis, depending on how the 2020 and 2022 transactions are interpreted) as set out in Appendix B.

Applying these multiples to the estimated pounds of U₃O₈ contained at Jabiluka MLN1 (based on previously defined Mineral Resources) results in the derived values shown in Table 7.16.

Table 7.16: Jabiluka MLN1 – Encumbered basis

Project	Classification	Multiple assigned (A\$/lb U ₃ O ₈)		Contained (Mlb U ₃ O ₈)	Value implied (A\$M)	
		Low	High		Low	High
Jabiluka	Historical estimate	0.50	1.10	302.3	151.1	332.5

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

SRK notes that these its derived values based on the Ben Lomond transactions lie below the values implied by the other methods. However, SRK notes that the Ben Lomond transactions involve assets that are constrained in that uranium mining is not currently permitted in Queensland. Hence without the application of a premium, this derived value is likely to more accurately reflect the encumbered value of Jabiluka MLN1 than the unencumbered value.

Geoscientific rating

As a further cross-check, SRK has also used the geoscientific rating method to estimate the market value of a 100% interest in the exploration potential associated with Jabiluka MLN1. The geoscientific rating or modified Kilburn method of valuation attempts to quantify the relevant technical aspects of a property through the use of appropriate Multipliers (factors) applied to an appropriate base (or intrinsic) value. The intrinsic value is referred to as the Base Acquisition Cost (BAC) and is critical in that it forms the standard base from which to commence a valuation. It represents the 'average cost to identify, apply for and retain a base unit of area of title'.

Multipliers are considered for off-property aspects, on-property aspects, anomaly aspects, and geology aspects. These multipliers are applied sequentially to the BAC to estimate the Technical Value for each tenement. A further market factor is then considered to derive a Market Value.

The BAC incorporates annual rental, administration and application fees, in addition to nominal indicative minimum expenditure on acquisition. The BAC assumptions are listed in Table 7.17.

²⁶ Given uranium mining is banned in Queensland.

The rating criteria use to assess the modifying factors are provided in Table 7.18. These ratings criteria have been modified by SRK.

In converting its implied technical value to a market value, SRK considers that market participants would apply a slight premium to the technical value of the exploration tenure given current market sentiment in relation to uranium (Table 7.19). SRK notes that while there has been recent news flow and listings in Australia relating to uranium assets, these tend to have been directed to international assets in Africa and North America. The corporate transactions between Deep Yellow/Vimy and Paladin/Fission provide examples of recent Australian corporate transactions in the uranium sector.

Table 7.17: Base acquisition cost – NT Mineral Lease

NT Mineral Lease		
Metric	Unit	Value
Average licence size	km ²	2.29
Average licence age	Years	10
Application fee	A\$ per lease	907
Annual rent	A\$ per km ²	21
Minimal annual expenditure	A\$ per km ²	-
Costs of identification	A\$ per lease	810
Administration and other	A\$ per lease	242
Landowner notices, negotiations, legal costs and other	A\$ per lease	10,000
BAC of average mineral licence	A\$ per km²	5,233

Source: SRK analysis, 2025

However, SRK has used its professional judgement and applied a discount of between 40% and 65% to the values associated with ERA's Jabiluka MLN1 to reflect the combined uncertainties arising from the legal proceedings regarding the renewal of MLN1, the terms of the various agreements pertaining to Jabiluka in particular the LTCMA, the associated requirement for the consent of Traditional Owners, governmental and other approvals, and the outcome of future techno-economic studies regarding a potential development pathway (Table 7.20).

Based on its geoscientific rating analysis, SRK has estimated the value of ERA's Jabiluka MLN1 resides between A\$145.8 M and A\$342.7 M (on an unencumbered basis), with a midpoint value of A\$244.2 M.

On an encumbered basis, SRK estimated the value of ERA's Jabiluka MLN1 resides between A\$51.0 M and A\$205.6 M (on an unencumbered basis), with a midpoint value of A\$128.3 M.

Table 7.18: Modified property rating criteria

Rating	Off-property factor	On-property factor	Geological factor	Anomaly factor
0.1			Generally unfavourable lithology	No mineralisation identified – area sterilised
0.5	Unfavourable district/basin	Unfavourable area	Alluvium covered, generally favourable lithology (50%)	Extensive previous exploration provided poor results
0.9			Generally favourable geological setting, under cover or complexly deformed or metamorphosed lithologies (50%)	Poor results to date
1.0	No known mineralisation in district	No known mineralisation on lease	Generally favourable lithology at surface (70%)	No targets outlined
1.5	Minor workings	Minor workings or mineralised zones exposed		
2.0	Several old workings in district	Several old workings or exploration targets identified	Generally favourable lithology with structures at surface	Several well defined targets Multiple exploration models being applied simultaneously
2.5			Generally favourable lithology with structures at surface along strike from mine	Significant mineralised zones exposed in prospective host rock
3.0	Abundant workings	Abundant workings	Generally favourable lithology with structures at surface along strike from major mine	Significant grade intercepts evident but not linked on cross or long sections
3.5				Several economic grade intercepts on adjacent sections
4.0	Mine or abundant workings with significant previous production	Mine or abundant workings with significant previous production	Generally favourable lithology with structures at surface along strike from major mine	Well-understood exploration model, with valid targets in structurally complex area, or under cover
5.0	Along strike from a major deposit			Several significant ore grade correlatable intersections Well-understood exploration model, with valid targets in well understood stratigraphy
6.0		Major mine with significant historical production		Advanced exploration model constrained by known and well-understood mineralisation
10.0	Along strike from a world class mine	World class mine		

Source: Modified after Xstrat (2009) and Agricola Mining Consultants (2011)

Table 7.19: Jabiluka exploration potential - geoscientific rating valuation

Tenement	Area (km ²)	BAC (A\$/km ²)	Equity		Off-property			On-property			Geology			Anomaly			Market			Market Value (A\$ M)		
			Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	Low	Upper	Midpoint			
MLN1	72.75	\$5,233	5	7.5	3.5	4	3.5	4	3.5	4	4	4	5	6	1.25	1.0	145.7	342.7	244.2			
Grand Total																	145.7	342.7	244.2			

Source: SRK analysis (2025)

Notes:

¹ Unencumbered basis.

Table 7.20: Jabiluka exploration potential – Encumbered basis

Discount applied	Low (A\$ M)			High (A\$ M)			Mid (A\$ M)		
	Unencumbered	40%	45%	50%	55%	60%	65%	Selected range	
	145.7	87.4	80.2	72.9	65.6	58.3	51.0	51.0	
	342.7	205.6	188.5	171.3	154.2	137.1	119.9	205.6	
	244.2	146.5	134.3	122.1	109.9	97.7	85.5	128.3	

Source: SRK analysis, 2025

Notes: Any discrepancy between table values is due to rounding.

Summary – Encumbered Value of Jabiluka MLN1

SRK’s aim in determining the encumbered value of Jabiluka MLN1 (based on previously defined Mineral Resources) has been twofold:

- **The top-down view:** to consider the value implied through the application of typical discounts to the previously defined Mineral Resource (which was first publicly reported by ERA to the ASX on 26 March 2025, but remained effective until it was superseded by ERA’s decision to no longer report a Mineral Resource as at 31 December 2024).
- **The bottom-up view:** to consider the value implied through a combination of recent transactions relating to historical estimates and a geoscientific rating method (which is typically adopted for the valuation of exploration potential).

Table 7.21 presents the outcome of this analysis. The bottom-up view has outlined values below those of the top-down view, but which are broadly supportive (with some overlap at the top end of the range indicated by the Bottom-up methods), especially in recognition that the Ben Lomond transaction is likely to be more representative of encumbered value than unencumbered value (given uranium mining is not permitted in Queensland). As such, SRK has assigned equal weighting to the values implied by precedent transaction (both mineral asset and corporate entities) and peer trading from the top-down view in selecting its preferred range.

Table 7.21: Summary Valuation – Jabiluka MLN1

Viewpoint	Valuation Method	Encumbered Value (A\$M)	
		Low	High
Top-down	Precedent Transaction – mineral assets	362.4	483.3
	Precedent Transactions – entities	332.2	422.8
	Peer Trading	302.0	422.8
Bottom-up	Ben Lomond transactions*	151.1	332.5
	Geoscientific rating	51.0	205.6
Selected		332.2	443.0
<i>Implied multiple (A\$/lb U₃O₈) in Target (average)</i>		<i>1.10</i>	<i>1.47</i>

Source: SRK analysis

Note: Any discrepancy between table values is due to rounding.

*on an encumbered basis given uranium mining is not permitted in Queensland.

7.7 Valuation of exploration potential

7.7.1 Ranger 3 Deeps

In considering the value that may be attributed by the market to the exploration potential associated with the RPA (and the underlying EL9644), with particular reference to the R3D deposit, SRK notes the following:

- The Section 41 Authority which continues until 8 January 2026, no longer permits mining and processing operations to be conducted over the RPA (since 8 January 2021) and as a result, ERA no longer has the requisite authorisation to conduct exploration, mining and processing activities over this area.
- The entire area of the RPA is underlain by an ELA (EL9644) under the NT *Mining Act 1992*.
- EL9644 has been pending grant since August 1996. This application intersects two lots of Aboriginal freehold land; one held by the Jabiluka Land Trust and the other by the Kakadu Land Trust, both of which comprise portions of the Kakadu National Park. Despite this EL9644 lies outside, but immediately adjacent to the Kakadu National Park.
- While the R3D deposit within the RPA has been deemed by ERA to no longer meet the RPEEE criteria outlined in the JORC Code (2012) and hence Mineral Resources are no longer reported by either ERA or Rio Tinto for R3D, no such criteria are required to support an Exploration Target (with the meaning as intended in the JORC Code) within the underlying ELA.
- SRK considers the longer-term potential associated with uranium mineralisation at R3D may be evaluated by some market participants as representing an Exploration Target within EL9644. In doing so, both tonnages and grade must be expressed in a range. The conceptual nature of the defined mineralisation must also be noted, with no guarantee that this will be converted to a Mineral Resource with further exploration or that the ELA will be eventually granted.
- To this end and based on the results of historical exploration and mining studies (as well as historical mining at Ranger 3 open pit), SRK previously considered an Exploration Target for the R3D deposit in the 2022 SRK Report.
- Previous economic viability of the R3D deposit was dependent upon easy access, principally arising from the Ranger 3 open pit, which is no longer available given the progression of ERA's rehabilitation and closure activities.
- The geological setting of the R3D deposit within permeable schists and other metamorphic rocks of the Cahill Formation precludes the use of *in situ* leach technologies for the recovery of uranium.
- The completion of rehabilitation and closure activities at Ranger (i.e. earthworks currently estimated to be completed in 2035, before entering a prolonged monitoring period to 2060 provided the closure criteria are achieved in line with currently estimate timeframes) effectively sterilises the R3D uranium deposit.
- ERA and Rio Tinto remain committed to maintain involvement with the RPA (and by association, EL9644) throughout the entirety of the rehabilitation and closure period. In part, this may arise due to the potential for reputational damage associated with the disposal of the RPA to third parties.
- Furthermore, there is unlikely to be a suitable and socially responsible purchaser willing to acquire the RPA (and by association EL9644) given the high, and increasing, capital cost estimate and ill-defined environmental thresholds to be achieved as part of the RPA's rehabilitation and mine closure.
- The Mirarr people, NLC and GAC remain steadfast in their opposition to further exploration, development and mining on their lands.
- Rio Tinto and ERA are highly unlikely to renege on their commitment to Traditional Owners not to undertake further exploration, development or mining on their lands without their consent.

- Rio Tinto, in particular, remains highly sensitive to the long-term opposition of the Traditional Owners, the Mirarr People, to further mining development on their country and acknowledge the previous statement by the GAC on 28 September 2022 regarding the 2022 Grant Thornton Valuation and its perceived “*failure to give due weight to their consistent and inter-generational opposition to further uranium mining on their country*”²⁷.
- Other stakeholders are likely to strongly oppose any future exploration, development and mining activities on, or in close proximity to, the Kakadu National Park.
- Based on the recent refusal to renew the nearby Jabiluka Mineral Lease, there appears to be no compulsion for the NT government to grant mineral tenure (such as EL9644) where there is strong opposition from Traditional Owners and other stakeholders (for example, in some jurisdictions it might be the case that if a tenement holder has adhered to tenement conditions and can demonstrate its capacity and intention to mine, there is effectively an obligation on the part of the approving authority to grant tenure).
- Based on recent statements made in relation to the renewal of the nearby Jabiluka Mineral Lease, the Commonwealth government clearly considers there is little to no political benefit, and potentially a lot of political harm, in allowing any mineral tenure (such as EL9644) to be granted, which may enable exploration and potentially (but only upon some future conversion to an extractive form of tenure) mining to proceed in proximity to Kakadu National Park (refer sections 4.2.1 and 4.2.2 of this report).
- It seems illogical that upon a return of the RPA to its pre-mining condition (i.e. following the completion of ERA’s rehabilitation and closure activities), that either the NT or Commonwealth governments would authorise any exploration, development or production relating to uranium from the R3D deposit.
- SRK understands that no rental or exploration expenditures are payable on EL9644 until it is granted.
- The NT *Mining Act 1992* does not explicitly state that Aboriginal land holders may veto the grant of an exploration tenure but makes specific provision for the Minister to refuse to grant an exploration licence on Aboriginal land. No specific reasons for refusal are set out in the Act. It would be a courageous Minister who approved the grant of the Exploration Licence in the face of public and hostile Aboriginal comment.
- The *Aboriginal Land Rights Act 1976* (NT) makes provision for Land Councils (not Land Trusts) to overrule the granting of an exploration licence.
- As demonstrated by the recently failed bid by Boss for Jabiluka, potential acquirers will require greater certainty regarding likely outcomes (particularly in respect of the legal standing of mineral tenure and the associated rights conveyed) in order to complete a transaction.
- In light of these factors, SRK is unable to outline a viable pathway for either the grant of, or subsequent exploration and/or development of EL9644.

As such, SRK considers it no longer has a reasonable basis to assign material value to EL9644. Accordingly, SRK considers that there is negligible, to no, value associated with EL9644.

²⁷ Rio Tinto release “Response to Energy Resource of Australia’s independent Valuation report” dated 29 September 2022.

7.7.2 Jabiluka

In selecting its appropriate resource multiples to be assigned to the Jabiluka Mineral Resources using both the Precedent Transaction and Peer Trading analyses, SRK has had to exercise a degree of judgement regarding the comparability of the assets and peer companies, while taking account of the ongoing opposition of Traditional Owners and other stakeholders regarding potential development scenarios going forward. In doing so, SRK notes that there are other known mineral deposits and prospects within the Jabiluka MLN1, including Jabiluka I. In this instance, SRK considers its selected multiples derived using the precedent transactions and peer trading analyses incorporates value which is attributable to exploration prospectivity and potential upside scenarios. Accordingly, SRK has not allocated further value to the MLN1 tenure, as it considers this upside potential is reflected in its value assessment of the Jabiluka Mineral Resource.

7.7.3 Cooper Creek JV Project

Precedent transaction analysis

In considering the exploration potential of ERA's Cooper Creek JV Project tenures, SRK has considered the transactions involving early to advanced stage uranium exploration assets as discussed in Section 7.5.2.

Based on its analysis of the transaction data, SRK has estimated the value of ERA's Cooper Creek tenures as summarised in Table 7.22. As these tenures remain in application, they have been discounted to account for the risk that they may not be granted timeously, or have stringent conditions included as part of the grant process, particularly as both tenures are currently in moratorium pending further discussions with Traditional Owners.

Table 7.22: Cooper Creek exploration potential valuation

Tenure	Area valued (km ²)	Selected multiples (A\$/km ²)	Market Value (A\$ M)		
			Lower	Upper	Midpoint
ELA23311	369.64	500–2,500 ¹	0.18	0.92	0.55
ELA23312	440.6	500–2,500 ¹	0.22	1.10	0.66
Total			0.41	2.03	1.22

Source: SRK analysis (2025)

Note:

¹ Includes a 50% discount as the tenures remain in application and moratorium (pending closure of discussions with Traditional Owners).

Geoscientific rating

As a crosscheck, SRK has again used the Geoscientific Rating method to estimate the market value of a 100% interest in the exploration potential associated with ERA's mineral assets at Coopers Creek.

SRK's assessment of ERA's 100% interest (as reflected by the NT Government's Strike portal pending grant) in the Coopers Creek JV Project using the geoscientific rating valuation method is summarised in Table 7.23.

Table 7.23: Cooper's Creek exploration potential geoscientific rating valuation

Tenement	Area (km ²)	BAC (A\$/km ²)	Equity	Off-property			On-property			Geology			Anomaly			Market	Application ¹	Market Value (A\$ M)		
				Low	High	Low	High	Low	High	Low	High	Low	High	Low	Upper			Midpoint		
ELA23311	369.64	\$589	100%	1	1.5	1	1.5	1	1.5	1	1.5	1	1	1.5	1.25	0.5	0.14	0.69	0.41	
ELA23312	440.6	\$589	100%	1	1.5	1	1.5	1	1.5	1	1.5	1	1	1.5	1.25	0.5	0.16	0.82	0.49	
Grand Total																	0.30	1.51	0.91	

Source: SRK analysis (2025)

Note:

¹ Application areas discounted by 50% due to the perceived uncertainty associated with likely timing of grant and associated conditions on approval, and that the tenures remain in moratorium.

Summary – Value of Exploration Potential

In valuing the exploration potential of the Jabiluka MLN1, SRK has placed equal weighting on both the results of the Comparative Transaction analysis and the Geoscientific Rating method, given the vagaries of the transaction dataset regarding projects that are supported by granted mining leases and/or have stalled on their development pathway.

In valuing the exploration potential of the Cooper Creek JV application areas, SRK has relied upon Comparative Transaction analysis as the primary methodology to derive its selected value range for the exploration potential. SRK has crosschecked the derived values using the Geoscientific Rating method.

SRK's value estimate for a 100% interest in the exploration potential associated with ERA's mineral assets is presented in Table 7.24.

Table 7.24: Summary Valuation – Exploration Potential

Project	Method	Value (A\$M)	
		Low	High
Ranger (EL9644)	NA	- ¹	- ¹
Jabiluka (MLN1)	NA	- ²	- ²
Cooper Creek JV (EL23311 & EL23312)	Precedent Transaction	0.42	2.03
	Geoscientific Rating	0.30	1.51
	Selected	0.42	2.03
Total		0.42	2.03

Source: SRK analysis

Note: Any discrepancy between table values is due to rounding.

NA – not applicable.

¹ no material value.

² included in Mineral Resource multiples assigned.

7.8 Valuation summary

Table 7.25 summarises the Market Value of ERA's mineral assets as at the effective Valuation Date (28 February 2025).

In considering the value of the Ranger area and in particular the R3D deposit, SRK notes there may be market participants who regard the remaining unmined portions of the R3D as an Exploration Target within ELA9644 (as the RPA expired in 2021). Based on its updated understanding of ELA9644 and its context within the broader rehabilitation efforts at the RPA, SRK no longer considers there is any material value associated with the exploration potential at ELA9644.

In valuing Jabiluka MLN1, SRK has compiled precedent transaction and peer trading data relating to higher grade (+0.25% U₃O₈) uranium deposits in Australia and North America. For various reasons as outlined in this report, SRK considers that the compiled datasets present some limitations which have been considered by LEA in its deliberations regarding the valuation of the

Jabiluka Project. At LEA's request, SRK has considered the value of the Jabiluka Project on both an unencumbered and encumbered basis.

In assigning its overall valuation range and preferred value to Jabiluka, SRK is cognisant that ERA no longer reports Mineral Resources for the project, which has significantly eroded the associated value to the project. SRK understands ERA's decision to write-off the Jabiluka Mineral Resource was taken as a viable development pathway is no longer apparent within the foreseeable future. However, SRK considers that despite ERA writing down the carrying value of Jabiluka in its financial accounts to nil, there would be participants within the market who regard Jabiluka as holding residual value, if only in the potential associated with defining a pathway to production at some future point. To this end, SRK has endeavoured to reflect the potential value remaining in the project by applying discounts to the previously reported Mineral Resource, analysis of exploration stage uranium projects in Australia and geoscientific rating methods.

In valuing the exploration potential of the Cooper Creek application areas, SRK has relied upon Comparative Transaction analysis as the primary methodology to derive its selected value range for the exploration potential. SRK has crosschecked the derived values using the Geoscientific Rating method.

As such, it is SRK's opinion that the current market is likely to pay between A\$816.5 M and A\$1,039.6 M, with a preferred value of A\$928.1 M for ERA's mineral assets on an unencumbered basis.

Furthermore, SRK considers the current market value for a 100% interest in ERA's mineral assets resides between A\$332.6 M and A\$445.0 M, with a preferred value of A\$333.0 M on an encumbered basis as set out in Table 7.25.

Table 7.25: Market value of ERA's mineral assets – summary

Project	Reference	Unencumbered (A\$ M)			Encumbered (A\$ M)		
		Low	High	Mid	Low	High	Mid
Ranger Project	Table 7.26	- ¹	- ¹	- ¹	- ¹	- ¹	- ¹
Jabiluka Project	Table 7.13 / Table 7.23	816.1	1,037.6	926.9	332.2	443.0	387.6
Cooper Creek JV	Table 7.26	0.4	2.0	1.2	0.4	2.0	1.2
Total		816.5	1,039.6	928.1	332.6	445.0	388.8
Selected		816.5	1,039.6	928.1	332.6	445.0	333.0

Source: SRK analysis

Note: Any discrepancy between table values is due to rounding.

¹ no material value.

SRK's positioning of its preferred unencumbered value is based on the mid-point of the range, as it has no preference towards either end of the range.

For its preferred positioning with respect to the encumbered value, SRK has elected to assign a value towards the lower end of its valuation range given:

- the various uncertainties which remain to be resolved (not least of which is the outcome of the current legal proceedings regarding tenure renewal)

- ERA's recent decision to write down the value of the Jabiluka project in its financial accounts to nil
- the longstanding and intergenerational opposition to the development of Jabiluka by Traditional Owner groups
- the downward trajectory implied by ERA's decision to no longer report Mineral Resources at Jabiluka.

In assigning its valuation range, SRK has endeavoured to keep its valuation range as tight as possible, while noting the high degree of inherent uncertainty associated with the mineral assets of ERA.

SRK is cognisant that should the pending legal action find against ERA, the value of Jabiluka may fall to nil.

7.9 Discussion on SRK's valuation range

In assigning its valuation range and preferred value, SRK is mindful that the valuation range is also indicative of the uncertainty associated with exploration and development assets.

The range in value is driven by the confidence limits placed around the size and grade of mineralised occurrences assumed to occur within each prospect area. Typically, this means that, as exploration progresses, and a prospect moves from an Early-Stage prospect, through Inferred, Indicated or Measured Mineral Resource categories to Ore Reserve status, there is greater confidence around the likely size and quality of the contained mineral and its potential to be extracted profitably.

Table 7.26 presents a general guide of the confidence in exploration targets, Mineral Resource and Ore Reserve estimates, and hence value, referred to in the mining industry.

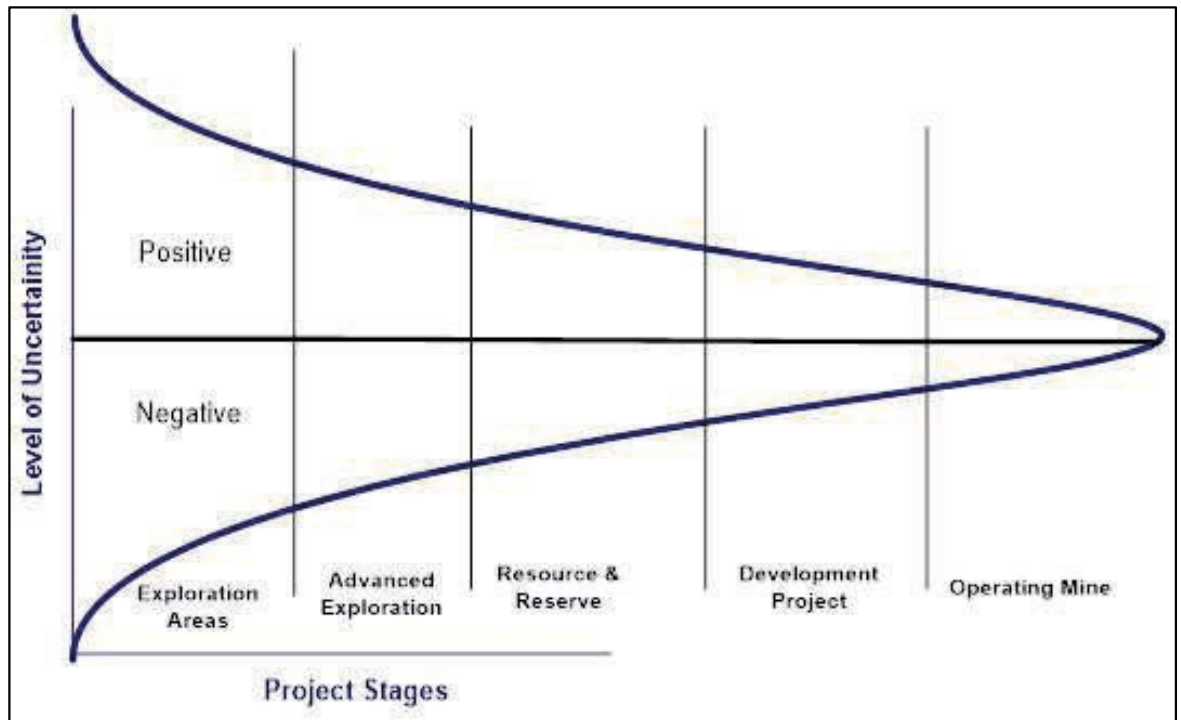
Table 7.26: General guide regarding confidence for target and Mineral Resource and Ore Reserve estimates

Classification	Estimate range (90% confidence limit)
Proven/Probable Ore Reserves	±5 to 10%
Measured Mineral Resources	±10 to 20%
Indicated Mineral Resources	±30 to 50%
Inferred Mineral Resources	±50 to 100%
Exploration Target	+100%

This level of uncertainty with advancing project stages can be seen in Figure 7.2.

Estimated confidence ranges from ±60% to 100% or more, are not uncommon for exploration areas and are within acceptable bounds, given the level of uncertainty associated with early-stage exploration assets. By applying narrower confidence ranges, one is implying a greater degree of certainty regarding these assets than may be the case. Where possible, SRK has endeavoured to narrow its valuation range.

Figure 7.2: Uncertainty by advancing exploration stage



Valuation risks

SRK is conscious of the risks associated with valuing exploration to development assets that can impact the valuation range. In defining its valuation range, SRK notes that there are always inherent risks involved when deriving any arm's length valuation. These factors can ultimately result in significant differences in valuations over time. The key risks include but are not limited to the risks outlined in the following subsections:

- Geological risk – uranium mineralisation is inherently inconsistent. SRK considers the geological risk as moderate.
- Uranium price – the uranium price is subject to economic market factors, which can result in large swings in price, with corrections, thereafter, presenting a moderate risk to future project development.
- Market risk – the global market has sufficient capacity to absorb any potential production from the project.
- Technical issues – while the Ranger Project has been closed following the expiry of relevant approvals, the potential development of Jabiluka has not yet been sufficiently tested. For example, a number of options remain to be finalised regarding siting of processing infrastructure which is likely to impact the project's economic viability. Further to this, no recent technical studies have been completed and as such many of the capital and operating costs estimates are no longer relevant.
- Approvals and permitting risk – SRK considers the approvals and permitting risk at the subject tenements to be high, given the expiry or near-term expiry of relevant approvals and permits.

- Native Title risk – SRK considers the risk from Native Title and Traditional Owner approval at the subject tenements to be high, given the prolonged and consistent opposition of Traditional Owners to the development of Jabiluka, as well as previous commitments made by both Rio Tinto and ERA. SRK notes that Native Title does not apply in the same way to this project as to others in the mining industry. The Long-Term Care and Maintenance Agreement grants a ‘subjective’ approval right to the Traditional Owners which is a higher standard than Native Title interests.
- Environmental risk – SRK considers the environmental and social risk at the subject tenements to be high, given the location of the mineral assets in proximity to the Kakadu National Park and that many of the thresholds or outcomes to be achieved through ongoing rehabilitation and closure works remain to be agreed.
- Geopolitical risk – terrorist, political and operational risks are rated low.

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Closure

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Jeames McKibben
Principal Consultant

and reviewed by

A handwritten signature in black ink, appearing to read "Phillip Ashley", written over a horizontal line.

Phillip Ashley
Principal Consultant

All data used as source material plus the text, tables, figures, and attachments of this document have been reviewed and prepared in accordance with generally accepted professional engineering and environmental practices.

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Appendix A

Closure implementation work program summaries

Area

Summary of closure implementation (ERA (2020) – 2020 Mine Closure Plan Report)

Pit 1 (Domain 1)
 ERA commenced deposition of neutralised tailings into Pit 1 in 1996 following an application to the Minesite Technical Committee, approved by the NT minister in 1995.
 Following the installation of prefabricated vertical drains (wicks) to promote consolidation in 2012, Pit 1 backfill activities commenced. The final backfill and landform contouring was completed in August 2020, with scarification of the final landform occurring in November 2020 and revegetation during the 2020/2021 wet season.
 Closure and rehabilitation have been completed on Pit 1 with monitoring and adaptive management now being undertaken.

Summary of closure activities (ERA (2024) – Ranger Mine Closure Plan 2024)

From Executive Summary:

Completed Activities

- Mining Of Pit 1 ended in December 1994.
- Underdrain installed in preparation to receive tailings.
- Tailings deposition began in August 1996 and ended Q4 2008.
- Wicking to assist dewatering and consolidation of tailings.
- Installation of geotextile layer and initial capping in 2013–14.
- Full backfill started in May 2019 and final landform achieved in August 2020.
- Scarification of the landform started in November 2020 and rehabilitation plantings started in 2021.
- Creation Of habitat via rock features.

Current Activities

- Removal Of pit tailings flux (process water) via decant wells.
- Monitoring, maintenance and adaptive management activities to inform surface water runoff and ecosystem re-establishment.
- This work will enable the Ranger Project Team to apply lessons learnt to other landforms as they are progressively established.

Planned Future Activities (seeking approval via 2024 MCP)

The area surrounding the perimeter of Pit 1 is scheduled for a general clean-up. Small areas with infrastructure no longer used for their designed purpose in the vicinity will be dismantled and rehabilitated:
 ■ Former Orica Explosives Storage Yard and Laydown Area (now contains several demountables, the ammonium nitrate emulsion storage silo, the disused workshop with spare parts and small machinery, redundant high density polyethylene (HDPE) pipes, scrap steel, and disused equipment (e.g. an old drill rig and diesel generators);
 – the former trial evaporators area
 – decommissioned pumping booster station
 – the omega pumping station
 – objects and materials from the Pit 1 Laydown Yard.

The material removed will either be sold (once cleared for radiation), repurposed or placed temporarily in the Pit 3 waste dump or laydown area prior to disposal into Pit 3 following secondary capping.
 The future closure activities associated with the Pit 1 closure domain, which are not seeking approval via 2024 MCP, are the removal of the interim water management perimeter drain, Corridor Road Sump, decant wells and infrastructure, and the revegetation of these areas. These activities will be included in the Final Landform application.

Pit 3

(Domain 2)

Open cut mining in Pit 3 commenced in July 1997 and ended in November 2012. Tailings deposition into Pit 3 commenced in 2015. Subaerial mill tailings deposition was scaled back to flushing and cleaning activity with the cessation of Mill operations on 8 January 2021. Dredge tailings deposition was completed on 15 February 2021. Pit 3 is continuing to receive remnant tailings from the TSF. Tailings deposition methods have been trialled and modified to improve consolidation and increase the likelihood of achieving the target closure date. Decant wells will be installed during backfill options for tailings dewatering/consolidation.

Prior to the placement of tailings in Pit 3, 33.7 Mt of low-grade ore and non-mineralised waste rock (termed underfill) was backfilled. This void within the underfill is being used for the storage of waste residue produced by the Brine Concentrator. An underdrain system comprising a 2 m layer of waste rock and a sump was constructed over the underfill to facilitate tailings consolidation and allow for the injection of brine. Brine injection wells are installed to allow for placement of the brine into Pit 3 underfill. Remediation work on the underdrain bore and associated infrastructure was completed in the second half of 2020, and recommissioning of the existing brine injection system is underway. Following completion of tailings deposition, pit capping works will commence similar to Pit 1. Once sufficient geotechnical strength is obtained in the initial cap, bulk backfill will commence, followed by surface contouring to the final landform shape and revegetation.

■ From Executive Summary:

Completed Activities

- Mining started in 1997 and ended in November 2012.
- Underfill, underdrain and dewatering systems completed 2012-2014. The underfill was constructed by placing 32 Mt of waste rock into the bottom of the pit, raising the height of the floor from -265 mRL up to an average level of -100 mRL.
- Pit 3 can hold about 2.5 GL of brine. The total volume of brine to be disposed at Ranger is estimated to be 1.9–2.1 GL, which represents 76–84% of the calculated storage capacity.
- Approximately 500 megalitres (ML) of brine has been injected into the underfill to date compared to the total volume of 1.9–2.1 GL of brine to be injected (i.e. approximately 23.8% of the total brine to be injected has been injected)
- Tailings deposition from mill processing started in 2015 and ended 2021.
- Tailings transfer from TSF started in 2016 and ended 2021.
- Remnant tailings from the TSF (gravel and rock), were transferred to Pit 3, with approximately 1.77 million cubic metres (Mm³) moved by dump truck by December 2021.
- Tailings floor transferred via truck and dozer.
- Wicking to assist dewatering and consolidation of tailings.
- Dewatering of the pit to accelerate the drying out of the tailings.
- The tailings surface within Pit 3 is not uniform, with a higher elevation on the eastern side compared to the western side, except for a narrow perimeter strip around the western side that also has a higher elevation. As a result, the pit floor has been divided into five zones that will dry out at different times during and after dewatering. It will take approximately 18–24 months for all zones to dry-out, with the wicked zones (Zone 3A, 3B and 4) being last.

Current Activities

- Brine injection into the underfill zone via pit wall directional drilling.
- Dust suppression activities and crusting the tailings surface (amphibious excavator, water spray, amphiroller). Amphibious excavators are being used to help accelerate tailings consolidation and create a surface crust. These machines produce a crust-like surface with a thickness of approximately 1–1.5 m as they overturn the tailings surface, reducing the time taken to gain sufficient geotechnical strength on the surface of the tailings.

Planned Future Activities

- Installation of geotextile and then initial and secondary capping (standalone approval application for Pit 3 backfill lodged September 2023 and approved August 2024).
- Placement of demolished plant and other infrastructure/materials into Pit 3 (standalone approval application to demolish plant will be submitted).
- Progressive waste disposal and bulk backfill (standalone approval application for Pit 3 backfill).
- Final 6 m Of landform and revegetation (standalone approval application for Final Landform will be submitted).

Area	Summary of closure implementation (ERA (2020) – 2020 Mine Closure Plan Report)	Summary of closure activities (ERA (2024) – Ranger Mine Closure Plan 2024)
<p>TSF (covered in both domain 2 & 3) D3 = RWD</p>	<p>The TSF dredged tailings transfer to Pit 3 started in 2015 and ceased on 15 February 2021. The remnant tailings within the TSF floor and the wall were subsequently removed and transferred to Pit 3. The bulk of the decant pond in the Pit was then pumped to the TSF. At the cessation of process water storage, the TSF will be deconstructed.</p> <p>The TSF serves as an important storage facility for water, during Pit 3 closure works. ERA has identified a suitable location in the southeast corner of the TSF; to allow for the burial of the dredging equipment and any other miscellaneous waste material remaining in the TSF at the time of deconstruction.</p> <p>Once the TSF is empty of process water, decommissioning, including any contaminated material management activities, will commence. During the deconstruction work, the TSF will be converted to a pond water catchment. Upon completion of the final landform in this area, the TSF catchment will be converted to a release water catchment.</p> <p>TSF deconstruction will involve reducing the walls to final landform level. Wall material will be used to fill in the TSF basin. The majority of the material used in the construction of the TSF walls will fit into the TSF basin to achieve the final landform. Final landform contouring and revegetation for the TSF site is planned for 2025.</p>	<p>From Executive Summary:</p> <p>Completed Activities</p> <ul style="list-style-type: none"> ■ Tailings transfer into Pit 3 ended in 2021. ■ Cleaning of remnant tailings from walls and floor in 2019–21. ■ RWD wall notches installed and process water received from Pit 3 in 2022. <p>Current Activities</p> <ul style="list-style-type: none"> ■ Process water storage and evaporation. <p>Planned Future Activities</p> <ul style="list-style-type: none"> ■ RWD deconstruction (standalone approval application for Final Landform). ■ Final landform and revegetation (standalone approval application for Final Landform).
<p>Process plant, water treatment plants and other infrastructure (Domain 5,</p>	<p>A demolition sequence has been determined for the areas of the plant. Following the cessation of processing activities on 8 January 2021, decommissioning and demolition of the process plant commenced. Plant, equipment, buildings and other structures were removed unless approval of the Traditional Owners and Commonwealth Minister is given for infrastructure to remain on the RPA. Demolished materials will be disposed of onsite at 6 m level deep below final landform if disposed amidst waste rock.</p> <p>Work on decommissioning and decontamination of all infrastructure within the processing plant has now been completed. Works to ensure the continuity of services have also commenced. Detailed material take-offs (a list of materials with quantities and types) have been completed to provide a more accurate estimate for major process buildings.</p> <p>With the completion of decommissioning of the processing plant, current rehabilitation involves only care and maintenance work to ensure the area remains safe prior to completion of demolition work.</p>	<p>From Executive Summary:</p> <p>Completed Activities</p> <ul style="list-style-type: none"> ■ Decommissioning of infrastructure associated with the leaching and solvent extraction circuits and areas of calcination, drying and product packing. <p>Current Activities</p> <ul style="list-style-type: none"> ■ Sampling for contaminated material ■ Ongoing use of water treatment facilities (e.g. brine concentrator, brine squeezer, water treatment plants), fuel storage, power station and administration buildings. <p>Planned Future Activities</p> <ul style="list-style-type: none"> ■ Demolition of plant/crusher (standalone approval application to demolish plant). ■ Treatment of water - progressively transfer sections from process water to pond water. ■ Remediation of contaminated sites. ■ Revegetation (standalone approval application for Final Landform).
<p>Stockpiles Domain 6 – will be incorporated into final landform and backfill source rock for D1 & 2</p>	<p>The bulk material movement plan provides for excavation of areas above the final landform (in the stockpiles and TSF) when there is neatly 100% acceptable material for the final landform. Mining of stockpiles for the backfilling of Pit 3 and creation of the final landform is scheduled to commence in October 2022. Mining material from stockpiles and the TSF is scheduled for completion in September 2025.</p>	<p>From Executive Summary:</p> <p>Completed Activities</p> <ul style="list-style-type: none"> ■ Stockpile waste rock used to backfill Pit 1 in 2020. ■ Stockpile waste rock used to create Stage 13 and Stage 52 final landform. ■ Progressive rehabilitation of small areas. <p>Current Activities</p> <ul style="list-style-type: none"> ■ Weed and water management . ■ Preparation for capping Pit 3. <p>Planned Future Activities</p> <ul style="list-style-type: none"> ■ Re-routing pipelines. ■ Initial capping and bulk material movement for Pit 3 backfill (standalone approval application for Final Landform). ■ Bulk material movement for RPA final landform (standalone approval application for Final Landform).

Area	Summary of closure implementation (ERA (2020) – 2020 Mine Closure Plan Report)	Summary of closure activities (ERA (2024) – Ranger Mine Closure Plan 2024)
<p>Water management areas</p> <p>D7A-G</p>	<p>There is an ongoing need to actively manage water throughout the closure and rehabilitation. The Ranger mine footprint is divided into catchment areas that generate run-off and/or seepage as a result of incidental rainfall. Each catchment may comprise of several elements including retention ponds, sumps, collection basins and groundwater interception ponds.</p> <p>Currently, within the closure schedule, rehabilitation is expected to commence in 2023 depending upon the level of rehabilitation required.</p> <p>Pond water (water derived from rainfall on the active mine catchments) is collected on the RPA is transferred to retention pond 2 (RP2 – the main pond water storage) or RP6. To allow earlier deconstruction of the TSF, process water in the TSF will be transferred out of the TSF into RP6. Once all the pond water has been treated on site, RP2 will be prepared to receive waste material from Phase 2 of demolition.</p> <p>Release waters (rain water from the mine footprint) are stored within RP1 and Georgetown Creek median bund level line (GCMBL) is required until almost to the end of closure.</p> <p>Wetland filters will be required throughout the majority of closure for ongoing water management.</p> <p>The Ranger Water Management Plan requires sumps and pumps to manage the flow and separation of classes of water throughout the wet season and will continue during closure.</p> <p>Georgetown and Coonjimba creeks will continue to receive direct release water from the final landform during and after closure.</p>	<p>From Executive Summary:</p> <p>Completed Activities</p> <ul style="list-style-type: none"> ■ Ongoing use. <p>Current Activities</p> <ul style="list-style-type: none"> ■ These areas continue to support ongoing water storage, dust suppression and management, including authorised release of treated water during the wet season. ■ Sampling for contaminated material. <p>Planned Future Activities</p> <ul style="list-style-type: none"> ■ Ongoing use ahead of progressive remediation, backfill, rehabilitation of retention ponds, water storages and wetlands filters.
<p>Land Application Areas</p> <p>Domain 4A-G</p>	<p>LAAs will be required throughout closure to allow for the ongoing disposal of release water. A preliminary assessment of the total percentage of each LAA requiring revegetation has been made. Assessments to characterise the LAA substrates have been completed. It has been determined that only 158 ha within the total area of LAAs will require active revegetation. ERA is planning to conduct further surveys of the LAAs to finalise the rehabilitation planning just prior to execution.</p>	<p>From Executive Summary:</p> <p>Completed Activities</p> <ul style="list-style-type: none"> ■ Used for disposal of release water during the dry season when required. <p>Current Activities</p> <ul style="list-style-type: none"> ■ Ongoing disposal of release water when required. ■ Sampling to confirm levels of contamination and removal from Ranger Contaminated Sites Register if applicable. <p>Planned Future Activities</p> <ul style="list-style-type: none"> ■ Ongoing use ahead of progressive remediation, backfill, rehabilitation of retention ponds, water storages and wetlands filters.
<p>Ranger 3 Deeps decline</p> <p>Domain 9G</p>	<p>The R3D underground mine project was not progressed and the decline was placed in care and maintenance in June 2015. In April 2019 ERA received approval from both the Commonwealth and Northern Territory Ministers to commence rehabilitation and closure of R3D. The first stages of closure of the decline commenced in 2019 with the removal of all infrastructure, the plugging of the base of the vent shaft and the flooding of the underground workings. In May 2021, ERA notified stakeholders of its intent to commence the final closure and backfill program component of the R3D exploration decline decommissioning plan. Backfilling of the decline (the weathered zone) commenced in June 2021 and was completed in late 2021. The revegetation program is currently scheduled to commence in January 2025.</p>	<p>After commissioning, the underground mining project was abandoned and the R3 Deeps exploration decline was subsequently placed into care and maintenance in early 2015.</p> <ul style="list-style-type: none"> ■ An application for the staged transition to the final closure of the R3 Deeps decline was submitted to the MTC in July 2018 and approved in April 2019. This application outlined the decommissioning strategy, environmental considerations, outcomes of a BPT assessment, and a risk assessment. ■ The ventilation shaft access would be backfilled with waste rock to form a plug (proposed to be undertaken in the 2018 works program). ■ Next, the shaft would be backfilled with 2,025 m³ crushed waste rock up to around the weathered zone (20 m below the ground surface). A 125 m³ cement-rockfill (CRF) plug would be placed above the crushed rock from 20 m through to 10 m below the ground surface. ■ Finally, the top 10 m would be filled with crushed rock. ■ In 2021, ERA initiated the final closure and backfill program. The decline was inspected, and a ventilation system was installed. Backfilling commenced on 22 June 2021 and was completed on 7 August 2021. Backfilling in the decline involved placing 13,970 m³ of waste rock as tight as practicable. ■ The ventilation shaft was backfilled and plugged to avoid settlement. The 11 m long CRF plug was installed closer to the surface than originally stipulated, allowing observation of cement/rockfill mixing progress during the installation. ■ A variation to the existing approval to account for this difference was lodged in September 2023 and approved in March 2024. The steel tunnel was dismantled, and access control features were removed. Works to permanently close the R3 Deeps exploration decline and ventilation shaft were successfully completed in mid-2021. <p>Planned Future Activities</p> <ul style="list-style-type: none"> ■ The steel multi-plate portal will be dismantled/cut down to final ground level. The ventilation shaft collar will be removed along with concrete pads, foundations, signage, fencing and other minor installations associated with controlling access to the vent shaft and portal area. ■ Contouring to final landform and revegetation of the R3 Deeps area will form part of the broader final landform and revegetation schedule.

Area

**Summary of closure implementation (ERA (2020)
– 2020 Mine Closure Plan Report)**

Other areas subject to closure implementation and addressed in the MCP include:

- waste material management
- linear infrastructure
- miscellaneous non-plant buildings
- nursery and core-yard
- Magela levee.

Under current legislation, ERA is obliged to rehabilitate the airport precinct. ERA is in consultation with key stakeholders regarding the ongoing operation of the airport. The ERISS offices and external services (Telstra) facilities are excluded from the Ranger Mine Closure Plan.

Other areas
Domain8 &9 (minus 9G)

**Summary of closure activities (ERA (2024)
– Ranger Mine Closure Plan 2024)**

From Executive Summary: (Linear infrastructure, miscellaneous areas, airport and ERISS offices, residual RPA)

Completed Activities

- Linear infrastructure
- Two redundant tracks (3.6 ha) and six drill pads (0.8 ha) have been rehabilitated.
 - Bulk of this domain is supporting ongoing activities.
- Miscellaneous areas
- Trail landform constructed in 2009 to investigate rehabilitation plantings into waste rock .
 - Ranger mine village and adjacent workshop rehabilitated in 2020.
 - All explosives have been removed from the magazine area and the site has been de-registered.
- Airport and ERISS offices
- Ongoing use.
- Residual RPA
- Exploration activities.

Current Activities

- Linear infrastructure
- These areas continue to support ongoing activities.
- Miscellaneous areas
- Ongoing use of the plant nursery, trial landform, Magela Creek levee and some landfill sites.
- Airport and ERISS offices
- Ongoing use.

Residual RPA

- Investigating partial relinquishment of ~3,000 ha north of Magela Creek.

Planned Future Activities

- Linear infrastructure
- Access during monitoring phase.
 - Progressive removal and rehabilitation as aspects of this domain are no longer required.
- Miscellaneous areas
- Relocating office space/gate house to maximise demolition efficiency.
 - Plant nursery expansion/core yard decommissioned and rehabilitated.
 - Progressive decommissioning, remediation, backfill and rehabilitation of miscellaneous areas.
- Airport and ERISS offices
- Handover to a third-party operator as advised by stakeholders.
 - Failing handover, final decommissioning and closure to commence in 2025.

Residual RPA

- Progressive rehabilitation and/or retention and handover of some access tracks to Mirarr (to be determined as part of partial relinquishment).

Contaminated sites

A *Plume and contaminated site management plan* describes future work (site assessments and BPT assessments), post remediation validation assessments and post-closure monitoring. A Contaminated Sites investigation was completed to address these gaps between December 2019 and January 2020. Results from this investigation and the historical work will be used to inform BPT assessments to determine future actions if required.

A sediment investigation program was conducted between November 2020 and February 2021 to characterise the ASS contamination potential and fill knowledge gaps in the inventory of sediment metal and radionuclide contamination on the RPA. Results from this investigation will be used to inform BPT assessments to determine future actions if required.

Area

**Summary of closure implementation (ERA (2020)
– 2020 Mine Closure Plan Report)**

Final landform/surface preparation

The area of the final landform will be 795 ha.

During the closure feasibility study, the final landform topography was updated and included progression of the following aspects from the pre-feasibility study design:

- material balance for closure works (total material available)
- flood modelling for erosion
- location of drain flow paths to prevent channels forming over pits
- overall landform slope gradient to minimise sediment transport
- slope contour ripping to minimise sediment transportation and improve water ingress
- in-stream environmental rock bars to slow sediment transportation
- in-stream sediment control structures to prevent (as far as practical) the loss of sediment from the disturbed area, and
- learnings from land evolution modelling conducted by the SSB.

The surface layer of the final landform will be constructed with 1s waste rock (non-mineralised) to ensure that radiation doses are as low as reasonably achievable. To achieve the revegetation objectives, design and construction of the surface layer requires consideration of plant available water, depth and heterogeneity of the waste rock surface layer, material chemical characteristics, and surface treatments to optimise nutrient cycling. A variety of surface treatments have been identified by ERA to limit erosion and sediment discharge on the general surface of the landform.

The final landform construction of Pit 1 commenced in Q2 2020 and was completed in September 2020. The remainder of the final landform construction will commence on or about March 2023 and will be ongoing to enable areas to be released progressively for revegetation.

Revegetation implementation

There is approximately 1,060 ha of land to rehabilitate and revegetate for the successful closure of the Ranger Mine, including 795 ha of waste rock covered area.

Revegetation planning and implementation will be guided by the ERA Ecosystem Establishment Strategy that has been developed based on the learnings from over 30 years of revegetation trials and research and an understanding of the natural surrounding ecosystems.

Ongoing monitoring of the trial landform will continue to inform the final approach to revegetation of the RPA.

A key consideration of the closure strategy was to provide progressive handover of final landforms to facilitate achievable revegetation production rates for contractors. A maximum rate of 1.5 ha/day revegetation day was set as a target, with the schedule commencing in April 2023.

Initial revegetation activities commence after site preparation is complete for an entire revegetation area. However, revegetation planning and preparation begins several years earlier, for example, with seed collection. The initial revegetation process broadly includes:

- planting design (planting density and distribution according to domain).
- seed collection and plant production.
- revegetation activities:
- site preparation (herbicide application, irrigation installation, planting site cultivation)
- tubestock planting (hole digging, fertiliser application, planting, watering in and/or irrigation).

**Summary of closure activities (ERA (2024)
– Ranger Mine Closure Plan 2024)**

- The constructed final landform area will be about 800 ha.
- The design of the final landform has been developed with the aim of producing a landform with similar indices of erosion and runoff distribution to the natural landscape.
- The first landform design (Final Landform Version 1; FLV1) was based on landform design criteria that included the requirement to have slopes ranging from 0 to 6.5%, a maximum relief of 25 m and profile and plan curvature specification.
- Following conceptual design, each version of the final landform is subjected to landform evolution modelling.
- The surface layer of the final landform will be constructed with 1s waste rock (non-mineralised) to ensure that radiation doses are as low as reasonably achievable.
- For areas of the landform that will be filled with a depth of waste rock exceeding 6 m (e.g. over mined out pits), a 'vegetation growth layer' will be constructed to a depth of at least 6 m, where practicable. With an appropriate proportion of fine materials, and a layered construction methodology, this depth of waste rock has been demonstrated to provide sufficient Plant Available Water (PAW) to sustain vegetation.
- Stakeholder consultation with the NLC and the GAC have indicated that ripping of the landform may impact traversability and should be minimised wherever possible. To address these stakeholder concerns and with lessons learnt from the TLF and Stage 13.1, a different approach was trialled on the surface of Pit 1.
- A grader blade was used to apply a light scarification (i.e. shallow 'ripping' using a grader blade with teeth 10 cm deep). Recent inspections suggest that the surface scarification is no longer visible, and the surface is easily traversed on foot.

■ Chapter 4 describes the closure activities at Ranger. Of most relevance to ecosystems, it is noted that:

- There is approximately 1,060 ha of land to rehabilitate on the RPA, including approximately 800 ha of reconstructed waste rock on the final landform area. Section 4.8 describes the bulk material movement and the waste rock discrimination plan that will facilitate the placement of non-mineralised (grade 1) waste rock within the upper layer of the final landform, to a depth of at least 6 m (where not overlying natural ground). Section 4.8 also describes the predicted timing of the final landform development and therefore the likely sequence of progressive rehabilitation as the various areas reach final landform.
- Section 4.8.3.2, and in particular Figure 4-29, shows the areas on the final landform that will receive varying depths of waste rock and the difference between current landform and the final landform.
- Section 4.4 describes the areas of the RPA that will be treated for contaminated soils (particularly RP1, Coorjimba Billabong and the Magela LAA). These areas will be subject to varying levels of revegetation.
- Section 4.4.3.1 describes the infrastructure that will be retained for several years after the creation of the final landform to ensure a continuity of services required for water treatment, monitoring and maintenance activities. This is important to understand as these areas will be replanted last in the project sequence.
- Sections 4.1, 4.4.6 and 4.7.2 describe the construction of Pit 1, the Ranger Mine Village and TLF respectively, which have facilitated ecosystem rehabilitation research trials.
- Section 4.5 describes the RWD deconstruction and a potential clay cap which would have implications for the suitability of planned ecosystem rehabilitation.
- As described in Section 4.8.4, the surface of the final landform will be planted with approximately 1,000 tubestock per hectare. Section 4.4.3.6 describes the plant nursery within which the collection and management of local provenance seed, and propagation to tubestock occurs.

Area

**Summary of closure implementation (ERA (2020)
– 2020 Mine Closure Plan Report)**

The selection of (revegetation) species is based on previous stakeholder-agreed lists, historic and recent reference site surveys, and consultation with CDU researchers, Bininj ecology experts, and Traditional Owners. The majority of stems (approximately 70%) used for revegetating the Eucalyptus savanna woodland domain on the final landform will consist of a handful of species, including dominate Eucalyptus and Corymbia trees, Acacias, and common fruiting shrubs. The remaining stems will be a range of tree, shrub and groundcover plants that, although in smaller densities, contribute significantly to the ecosystem's species richness, provide food and shelter for fauna, and/or are important species for Traditional Owners.

Substrates used to create the final landform shall be carefully managed during construction to prevent site contamination with weeds or their seeds

**Summary of closure activities (ERA (2024)
– Ranger Mine Closure Plan 2024)**

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Appendix B Precedent Transaction Data

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Appendix B.1 Resource Multiples – Precedent Transactions – Mineral Assets

Project	Announcement date	Purchaser	Vendor	Country	Region	Development stage	Consideration (100% basis) (\$ M)	Equity acquired (%)	Resource (Mt)	Resource grade U ₃ O ₈ (%)	Contained U ₃ O ₈ Resources (M lb)	Resource transaction multiple (raw) (A\$/ lb U ₃ O ₈)	Resource transaction multiple (normalised) (A\$/ lb U ₃ O ₈)
Aurora Uranium Project	19/11/2024	Eagle Energy Metals Corp.	Aurora Energy Metals Ltd.	USA	Oregon	Prefeas/Scoping	25.66	100%	107.3	0.02%	50.61	0.51	0.45
Mountain Lake Property	14/11/2024	Future Fuels Inc.	IsoEnergy Ltd.	Canada	Nunavut	Advanced Exploration	4.38	100%	1.6	0.23%	8.11	0.54	0.48
Assets of Rio Tinto	23/09/2024	Uranium Energy Corp.	Rio Tinto America Inc.	USA	Wyoming	Care and Maintenance	257.92	100%	0	#DIV/0!	175.00	1.47	1.33
Bellah Bore East Uranium Deposit	3/06/2024	Infini Resources Limited	Mine Operations Exchange Pty Ltd	Australia	Western Australia	Advanced Exploration	0.05	100%	0.4	0.02%	0.16	0.29	0.24
Yarramba Project	22/01/2024	Koba Resources Limited	Havilah Resources Limited	Australia	South Australia	Early to Advanced Exploration	9.75	80%	8.2	0.03%	4.70	2.59	1.90
Twelve Additional DOE Leases	3/01/2024	Anfield Energy Inc.	Investor Group	USA	Colorado	Advanced Exploration	8.93	100%	0	#DIV/0!	2.03	4.39	3.22
Alta Mesa project	6/12/2023	Boss Energy Limited	enCore Energy Corp.	USA	Texas	Care and Maintenance	91.36	30%	8.6	0.12%	22.29	13.66	11.50
Marquez-Juan Tafoya Project	6/06/2023	Anfield Energy Inc.	enCore Energy Corp.	USA	New Mexico	Prefeas/Scoping	20.40	100%	6.5	0.13%	18.06	1.13	1.42
Angilak Property	13/03/2023	Labrador Uranium Inc.	ValOre Metals Corp.	Canada	Nunavut	Advanced Exploration	46.99	100%	2.8	0.69%	43.06	1.09	1.54
Chord Property	3/03/2023	Basin Uranium Corp.	Cowboy Exploration & Dev. LLC	USA	South Dakota	Advanced Exploration	3.25	90%	1.7	0.11%	4.20	0.86	1.21
Alta Mesa ISR Project	14/11/2022	enCore Energy Corp.	Energy Fuels Inc.	USA	Texas	Care and Maintenance	179.28	100%	8.6	0.12%	22.29	8.04	11.20
South Falcon East property	20/10/2022	Tisdale Clean Energy Corp.	Skyharbour Resources Ltd.	Canada	Saskatchewan	Advanced exploration	15.85	51%	10.4	0.03%	6.85	4.54	6.02
Roughrider Uranium project	12/10/2022	Uranium Energy Corp.	Rio Tinto Group	Canada	Saskatchewan	PEA (Prefeas/Scoping)	239.19	100%	0.6	4.73%	57.38	4.17	5.53
Ben Lomond project (exercised)	15/06/2022	Consolidated Uranium Inc.	Mega Uranium Ltd.	Australia	Queensland	Prefeas/Scoping	3.43 - 3.74 ^	100%	1.9	0.25%	10.70	0.32 - 0.35	0.48 - 0.53
Cigar Lake mine	10/05/2022	Cameco & Orano Canada Inc	Idemitsu Kosan Co., Ltd.	Canada	Saskatchewan	Operating	207.22	8%	1.0	12.98%	279.07	9.43	14.00
Portfolio of Uranium Project	15/07/2021	Uranium Inc.	Energy Fuels Inc.	USA	San Miguel, Utah, Colorado	Care and Maintenance?	52.16	100%	2.9	0.21%	13.35	3.91	9.52
Uranium assets	5/01/2021	enCore Energy Corp.	Westwater Resources, Inc.	USA	New Mexico, Texas	Advanced Exploration, Closed, Operating, Reserves Development	7.92	100%	17.5	0.16%	62.13	0.13	0.34
Ben Lomond project (option)	14/05/2020	Consolidated Uranium Inc.	Mega Uranium Ltd.	Australia	Queensland	Prefeas/Scoping	3.14 - 5.83 ^	100%	1.9	0.25%	10.70	0.29 - 0.54	0.60 - 1.12
Uranium tenements	4/07/2019	Marenica Energy Limited	Optimal Mining Limited	Australia	Northern Territory, Western Australia	Prefeas/Scoping, Advanced Exploration	27.75	100%	25.6	0.09%	48.48	0.57	1.69
Wheeler River Project	4/09/2018	Denison Mines Corp.	Cameco Corporation	Canada	Saskatchewan	Pre-Feasibility	17.43	24%	1.9	3.23%	134.68	0.54	1.53
Alligator River Project	1/03/2018	Vimy Resources Limited	Cameco Corporation	Australia	Northern Territory	Advanced Exploration	6.50	75%	0.9	1.30%	26.08	0.33	1.26

Normalised to February 2025 averaged daily uranium price

^ the 2020 and 2022 Ben Lomond transactions involved a mixture of cash, shares, warrants and contingent payments of up to \$2.385 M based on movements in the monthly average uranium spot price.

Northern Territory Resource projects

Project	Announcement date	Purchaser	Vendor	Country	Region	Development stage	Consideration (100% basis) (A\$ M)	Equity acquired (%)	Resource (Mt)	Resource grade U ₃ O ₈ (%)	Contained U ₃ O ₈ Resources (M lb)	Resource transaction multiple (raw) (A\$/lb U ₃ O ₈)	Resource transaction multiple (normalised) (A\$/lb U ₃ O ₈)
Alligator River Project	10/03/2021	Viva Resources Pty Ltd	Rio Tinto	Australia	Northern Territory	Prefeas/Scoping	2.00	21%	0.91	1.30%	26.08	0.37	1.04
Uranium tenements	4/07/2019	Marenica Energy Limited	Optimal Mining Limited	Australia	Northern Territory, Western Australia	Prefeas/Scoping, Advanced Exploration	27.75	100%	25.6	0.09%	48.48	0.57	1.69
Alligator River Project	1/03/2018	Vimy Resources Limited	Cameco Corporation	Australia	Northern Territory	Advanced Exploration	6.50	75%	0.91	1.30%	26.08	0.33	1.26

Normalised to February 2025 averaged daily uranium price.

Include note regarding contingent payments

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Appendix B.2 Resource Multiples – Precedent Transactions – Corporate Entities

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Date	Target	Acquirer	Consideration (100% basis) (A\$ M)	Interest (%)	Reserves (Milb U ₃ O ₈)	Resources (Milb U ₃ O ₈)		Average Grade (%U ₃ O ₈)	Resource multiple (raw)		Resource multiple (norm)	
						Total	Ex hist		Total	Ex hist	Total	Ex hist
Jun 2024	Fission Uranium Corp	Paladin Energy Ltd	583	100%	93.7	130.3	130.3	1.78%	4.5	4.5	3.79	3.79
Sep 2023	Consolidated Uranium, Inc	IsoEnergy	227	100%	-	261.2	8.8	0.0327%	0.9	25.7	0.96	27.41
Jul 2023	A-Cap Energy Ltd	Lotus Resources Ltd	89	100%	-	190.3	190.3	0.0321%	0.5	0.5	0.64	0.64
Nov 2022	Virginia Energy Resources, Inc	Consolidated Uranium, Inc	37	100%	-	165.9	-	0.0483%	0.2	-	0.28	-
Jun 2022	UEX Corp	Uranium Energy Corp	300	100%	5.5	146.2	101.2	0.4937%	2.1	3.0	3.15	4.50
Nov 2021	Vimy Resources Ltd	Deep Yellow Ltd	257	100%	42.3	116.0	116.0	0.073%	2.2	2.2	3.68	3.68
Nov 2021	Uranium One Americas, Inc	Uranium Energy Corp	149	100%	-	41.9	-	0.0795%	3.6	-	6.02	-
Sep 2021	Azarga Uranium Corp	enCore Energy Corp	175	100%	-	49.1	49.1	0.0753%	3.6	3.6	6.38	6.38

Normalised to February 2025 averaged daily uranium price.

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Appendix B.3 Precedent Transaction – Exploration

Project	Announcement date	Purchaser	Vendor	Region	Tenure Type	Consideration (\$M)	Equity acquired (%)	Area (km ²)	Area multiple	Area normalised (\$/km ²)
South Australia										
Cummins	24/01/2025	Core Energy Minerals	R and B Resources Pty Ltd	South Australia	EL	0.32	51%	952	340.5	309.9
Harris Greenstone	24/01/2025	Core Energy Minerals	Harris Belt Holdings Pty Ltd	South Australia	EL	0.32	51%	1350	240.1	218.5
EL 6678	19/11/2024	Valrico Resources Pty Ltd	Undisclosed Seller	South Australia	EL	0.2	100%	1000	200	177.7
Radium Hill, Lake Namba - Billeroo and Prospect Hill	21/10/2024	Heavy Rare Earths Limited	Havilah Resources Limited	South Australia	EL	4.89	80%	2,949	1,658.0	1,440.5
Wirrulla	31/07/2024	Adavale Resources Ltd	Pinnacle Minerals Ltd	South Australia	EL	0.05	100%	957	52.3	44.0
Three Prospects	6/05/2024	Uvre Limited	Undisclosed Seller	South Australia	EL	0.29	100%	521	556.6	430.1
EL6553	26/03/2024	Adavale Resources Limited	Kilonova Metals Pty Ltd	South Australia	EL	0.14	100%	456	307.0	238.9
EL6350	18/05/2021	S Uranium Pty Ltd.	Stellar Resources Limited	South Australia	EL	0.25	100%	3.9	63,814.3	170,780.4
Erudina	24/02/2021	Argonaut Resources NL	Groundwater Science Pty Ltd	South Australia	ELA	0.35	100%	987	349.5	983.6
Big Lake	16/10/2019	Alligator Energy Limited	Investor group	South Australia	EL	0.33	100%	818.14	402.1	1,179.50
Queensland										
Oasis	13/01/2025	Greenvale Utilities Pty Ltd	Mavrick Exploration Pty Ltd	Queensland	EL	0.84	100%	90	9,333.0	8,494.0
Northern Territory										
Elkedra	20/11/2024	Greenvale Utilities Pty Ltd	Gempart (NT) Pty Ltd	Northern Territory	EL	0.01	80%	556	22.5	20.0
Henbury	21/10/2024	Greenvale Utilities Pty Ltd	Gempart	Northern Territory	EL	0.01	80%	1063	11.8	10.2
Tobermorey	16/10/2024	Greenvale Utilities Pty Ltd	Gempart (NT) Pty Ltd	Northern Territory	EL	0.01	80%	971	8.6	7.5
Murphy West	11/06/2024	DeveX Resources Ltd	Trek Metals Ltd	Northern Territory	EL	2.5 - 6.5*	80%	2714.74	920.9 - 2,394*	760.5 - 1,977.1*
Orange Creek	27/06/2023	Sulliden Mining	Undisclosed Seller	Northern Territory	EL	0.93	75%	723.9	1289.3	1626

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Project	Announcement date	Purchaser	Vendor	Region	Tenure Type	Consideration (100% basis) (A\$ M)	Equity acquired (%)	Area (km ²)	Area multiple (A\$/km ²)	Area multiple normalised (A\$/km ²)
		Capital Inc.								
Mount Douglas	9/09/2021	Sulliden Mining Capital Inc.	Undisclosed Seller	Northern Territory	EL	0.2	100%	601	332.8	589.50
Lagoon Creek	4/09/2018	Laramide Resources Limited	Verdant Minerals Ltd.	Northern Territory	EL	0.25	50%	190	1,315.8	3,722.2
Murphy	16/07/2018	Laramide Resources Limited	Rio Tinto	Northern Territory	EL	0.45	100%	683.5	658	2,188.9
Alligator River	1/03/2018	Vimy Resources Limited	Cameco Corporation	Northern Territory	EL	6.5	75%	3,865	2,242.3	8,489.5

Normalised to February 2025 averaged daily uranium price.

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Appendix C Peer Trading Analysis

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Appendix C.1 Company Description

Company	Code	Description
Cameco Corporation	TSX:CCO	Cameco Corporation provides uranium for the generation of electricity. It operates through Uranium, Fuel Services, Westinghouse segments. The Uranium segment is involved in the exploration for, mining, and milling, purchase, and sale of uranium concentrate. The Fuel Services segment engages in the refining, conversion, and fabrication of uranium concentrate, as well as the purchase and sale of conversion services. This segment also produces CANDU reactor fuel bundles and other reactor components. The company offers nuclear fuel processing services. The Westinghouse segment engages in the manufacture of nuclear reactor technology original equipment. This segment provides products and services to commercial utilities and government agencies; and outage and maintenance services, engineering support, instrumentation and controls equipment, plant modification, and components and parts to nuclear reactors. It sells its uranium and fuel services to nuclear utilities in the Americas, Europe, and Asia. Its uranium projects include Millenium, Yeellirrie, and Kintyre. The Cree Extension-Millennium project is a Cameco-operated joint venture located in the southeastern portion of Canada's Athabasca Basin. The Yeellirrie deposit is located approximately 650-kilometer (Km) northeast of Perth and about 750 km south of its Kintyre project. Cameco Corporation was incorporated in 1987 and is headquartered in Saskatoon, Canada.
Paladin Energy Limited	ASX:PDN	Paladin Energy Ltd is an Australia-based independent uranium producer with a 75% ownership in the Langer Heinrich Mine (LHM). The Company also owns a portfolio of uranium exploration and development assets in Canada and Australia. Its segments include Exploration, Namibia and Australia. The LHM is located in central western Namibia approximately 80 km east of Swakopmund and 85 km northeast of the Walvis Bay major deepwater harbour. Its Patterson Lake South (PLS) Project hosts the Triple R deposit, a large, high-grade and near-surface uranium deposit. The property comprises over 17 contiguous claims totalling 31,039 hectares. Its exploration projects include West Cliff, Larocque, Seahawk, Merlin, Corsair, Typhoon, Michelin, Manyinge and Mount Isa. The Company, through its subsidiary Aurora Energy Ltd, holds a 100% interest in over 98,320 hectares of mineral exploration licenses. These are located within the Central Mineral Belt of Labrador, Canada. The company was formerly known as Paladin Resources Ltd and changed its name to Paladin Energy Ltd in November 2007. Paladin Energy Ltd was incorporated in 1993 and is headquartered in Perth, Australia.
Uranium Energy Corp	NYSE:UEC	Uranium Energy Corp., together with its subsidiaries, engages in exploration, pre-extraction, extraction, and processing of uranium and titanium concentrates properties in the United States, Canada, and the Republic of Paraguay. The company owns interests in the Allemann-Ross, Antelope, Barge, Black Hills, Brown Ranch, Bull Springs, Central Shirley Basin, Charlie, Christensen Ranch, Clarkson Hills, Crooks Creek, Crook's Mountain, Crossroads, Cyclone Rim, East Shirley Basin, Gas Hills, Horse Creek, Irigaray, Job/West Jab, Ludeman, Moore Ranch, Nine Mile Lake, Pine Ridge, Pine Tree U1, Pumpkin Creek, Red Rim, Reno Creek, Ross Flats, Sand Creek, South Pine Ridge, South Sweetwater, Stewart Creek, Taylor Ranch, Twin Buttes, West Beaver Rim, West Crook's Creek, and West Sweetwater properties located in Wyoming, the United States; and Burke Hollow, Goliad, La Palangana, Salvo, and Longhorn projects situated in Texas. It also owns the Anderson, Los Cuatros, and Workman Creek mines located in Arizona; C de Baca and Dalton Pass projects situated in New Mexico; Alexandria, Beauty River, Black Lake, Brander Lake, Candie Lake, Carswell, Christie Lake, Close Lake, Cree Extension, Diabase Peninsula, Erica, Henday, Hidden Bay, Horseshoe-Raven, Key West, Laurie, Millennium, Milliken, Mirror River, Moon Lake, Moore Tomblin, Nikita, Rlou Lake, Roughrider, Shea Creek, Uchrich, Waterfound River, West Bear, Wheeler River, and Wolly properties located in Saskatchewan, Canada; and Kiggavik project situated in Nunavut, and the Yutty and Oviedo properties located in Paraguay, as well as owns and operates a processing plants and facilities, consisting of Irigaray Central and Christensen Ranch in Wyoming; and Hobson Central in Texas. It advances its In-Situ Recovery (ISR) mining uranium projects in the United States and conventional projects in Canada. It offers two production ready ISR hub and spoke platforms in South Texas and Wyoming. These two production platforms are anchored by operational central processing plants and served by seven U.S. ISR uranium projects. The company was formerly known as Carlin Gold Inc. and changed its name to Uranium Energy Corp. in January 2005. Uranium Energy Corp. was incorporated in 2003 and is headquartered in Corpus Christi, Texas.
Aura Energy Ltd	ASX:AEE	Aura Energy Limited, together with its subsidiaries, engages in the exploration and evaluation of mineral properties in Mauritania and Sweden. The company explores for uranium, vanadium, gold, and base metals. Its flagship property is the 85% owned This Uranium Project located in Mauritania. The Company is focused on uranium production commencing at the Tiris Project, a greenfield uranium discovery in Mauritania. It holds 125 square km of virgin Greenstone belt and is located approximately 36 km south of the Kinross 20 Moz Tasiast Mine. Its Haggan deposit is located in Berg municipality in the province of Jamiland in central Sweden. The Haggan Project is a poly-metallic deposit containing economically significant levels of vanadium, sulphate of potash, nickel, zinc, and molybdenum. It holds a 100% direct interest in the deposit. Its subsidiaries include Vanadis Battery Metals AB, Aura Energy Mauritania Pty Ltd, Tiris Resources SA, Tiris International Mining Company srl and others. Aura Energy Limited was incorporated in 2005 and is based in Melbourne, Australia.
Bannerman Energy Ltd	ASX:BMN	Bannerman Energy Limited is an Australia-based uranium development company engaged in the exploration and development of uranium properties in Africa. The Company's flagship asset is the 95% owned Etango Uranium Project that is located in the Erongo Region of Namibia, approximately 30 km southeast of Swakopmund. The Etango Uranium Project possesses a uranium mineral resource endowment of 207 million pounds (Mlb) of contained U ₃ O ₈ . The Etango Uranium Project is an undeveloped uranium deposit, located in the Erongo uranium mining region of Namibia which hosts the Rossing, Husab and Langer-Heinrich mines. The Company's subsidiaries include Bannerman Mining Resources (Namibia) (Pty) Ltd, Bannerman Energy (UK) Limited, Bannerman Investments Pty Ltd, Bannerman Energy Canada Ltd and Bannerman Energy (Netherlands) B.V. The company was formerly known as Bannerman Resources Limited and changed its name to Bannerman Energy Ltd in July 2021. Bannerman Energy Ltd was incorporated in 2005 and is based in Subiaco, Australia.
Forsys Metals Corp	TSX:FSY	Forsys Metals Corp. together with its subsidiaries, engages in the acquisition, exploration, and development of mineral properties in Africa. Its flagship project is the Norasa uranium project in the Republic of Namibia, which is wholly owned by its 100% owned operating subsidiary, Valencia Uranium (Pty) Ltd. The Norasa Uranium Project comprises the Valencia Uranium deposit (ML-149) and the nearby Namibiplats Uranium deposit (EPL-3638). The Valencia Uranium project is situated on the farm Valencia 122, which is located approximately 75 km northeast of the town of Swakopmund in central-west Namibia, covering an area of 735.6 ha. The Namibiplats Uranium project is located 7.5 km northeast of the Valencia deposit on the farm Namibiplats 93, with a total surface area of 1,269 ha. The company was formerly known as Forsys Technologies Inc. and changed its name to Forsys Metals Corp. in June 2005. Forsys Metals Corp. was incorporated in 1985 and is headquartered in Toronto, Canada.
Global Atomic Corp	TSX:GLO	Global Atomic Corporation engages in the acquisition, exploration, and development of uranium properties in Niger. It provides a combination of high-grade uranium mine development and zinc concentrate production. It has two principal lines of business: the processing of electric arc furnace dust (EAFD) obtained from steel companies in Turkey through a Waez kiln process to recover zinc concentrates that are then treated by zinc smelters (EAFD Business); and the acquisition, exploration and development of uranium properties in Niger (Uranium Business). Its Uranium Division is developing the fully permitted, large, high grade Dasa Deposit. Dasa is a high-grade sandstone-hosted deposit with mineralisation across a range of horizons from Jurassic to Carboniferous in age. Its Base Metals Division holds a 49% interest in the Befesa Silvermet Turkey, S.L. (BST) Joint Venture, which operates a modern zinc recycling plant, located in Iskenderun, Turkey. Its joint venture partner, Befesa Zinc S.A.U. (Befesa) holds a 51% interest in and is the operator of the BST Joint Venture. Global Atomic Corporation is headquartered in Toronto, Canada.
Lotus Resources Limited	ASX:LOT	Lotus Resources Limited is an advanced uranium company engaged in the exploration, evaluation, and development of uranium properties in Africa. It primarily owns an 85% interest in the Kayelekera uranium project located in Malawi; and holds a 100% interest in the Lethakane uranium project situated in Botswana. It has four business segments and two geographical locations, being the exploration, evaluation and development of Uranium assets in Africa (comprising the geographical locations Malawi and Botswana), nickel-cobalt exploration, evaluation and corporate activities in Australia. The Kayelekera Uranium Project is located in northern Malawi, southern Africa, 52 km west by road from the town of Karonga. It also owns 100% interest in Lethakane Uranium Project in Botswana and holds a 55% interest in the Wilcoft Nickel Cobalt Project in Western Australia. The company was formerly known as Hylea Metals Limited and changed its name to Lotus Resources Limited in August 2019. The company was incorporated in 2006 and is headquartered in Perth, Australia.
Berkeley Energia Ltd	ASX:BKY	Berkeley Energia Limited is a Spain-based mineral development company engaged in the exploration and development of mineral properties in Spain. The Company's main focus is bringing its wholly owned Salamanca project into production in a uranium mining area in western Spain. Its activity provides exploration and production with the objective of supplying nuclear energy sector. The company also explores for uranium, tungsten, cobalt, antimony, and other metals through its interests in the Oliva and La Majada projects situated in Spain. The company was formerly known as Berkeley Energy Limited and changed its name to Berkeley Energia Limited in November 2015. Berkeley Energia Limited was incorporated in 1991 and is based in Perth, Australia.
Deep Yellow Ltd	ASX:DYL	Deep Yellow Limited, together with its subsidiaries, operates as a uranium exploration and development company in Namibia and Australia. Its flagship property is the 100% owned Tumas Project located in Namibia. Its projects include Namibian project portfolio comprising Tumas Project, Omahola Project, Nova joint venture (JV) Project, Yellow Dune JV Project, Mulga Rock Project, and Alligator River Project. The Tumas Project comprises of a series of palaeochannel/calcrete-type uranium deposits. Omahola Project is located within the prospective Alaskite Alley corridor, within which uranium deposits, including Rossing, Husab, Etango and Valencia are located. The Nova joint venture (JV) Project includes two exclusive prospecting licenses (EPL) prospective for both basement and palaeochannel-type uranium mineralisation. The Yellow Dune JV comprises one mineral deposit retention license (MDRL) covering a drilled-out uranium resource of the palaeochannel/calcrete-type at Aussinhanis. The Mulga Rock consists of two separate mining areas over a total length of 30 km. The company is also involved in the iron ore exploration and property investment businesses. Deep Yellow Limited was incorporated in 1985 and is headquartered in Subiaco, Australia.

Company	Code	Description
Denison Mines Corp	TSX:DML	Denison Mines Corp. is a Canada-based uranium exploration and development company focused on the Athabasca Basin region of northern Saskatchewan, Canada. The Company holds a 95% interest in the Wheeler River Project, which is a uranium project. It hosts two uranium deposits: Phoenix and Gryphon. It is located along the eastern edge of the Athabasca Basin in northern Saskatchewan. It holds a 22.5% ownership interest in the McClean Lake joint venture (MLJV), which includes several uranium deposits and the McClean Lake uranium mill. It also holds a 25.17% interest in the Midwest Main and Midwest A deposits, and a 67.41% interest in the The Heideth Tue (TH) and Huskie deposits on the Waterbury Lake property. The Company, through JCU (Canada) Exploration Company, Limited, holds indirect interests in the Millennium project, the Kiggavik project, and the Christie Lake project. It also offers environmental services. The Company also uses MaxPERF drilling tool technology and systems. The company was formerly known as International Uranium Corporation and changed its name to Denison Mines Corp. in December 2006. Denison Mines Corp. was incorporated in 1936 and is headquartered in Toronto, Canada.
Laramide Resources Ltd	TSX:LAM/ASX:LAM	Laramide Resources Ltd. is a Canada-based company, which is focused on exploring and developing uranium assets in Tier-1 uranium jurisdictions of Australia, United States and Kazakhstan. The Company's portfolio comprises predominantly advanced uranium projects. In Australia, its 100% owned Westmoreland Uranium project is located in northwest Queensland and covers over 548.5 km ² . Its tenements are contiguous and are located as a group approximately 400 km north-northwest of Mt Isa. The Murphy Uranium Project consists of 683.5 km ² of granted exploration tenure, which lies contiguous to and along the strike from its Westmoreland Project in northwest Queensland. In the United States, its assets include the Crownpoint-Churchrock Uranium Project, La Jara Mesa project in the Grants mining district of New Mexico, and an underground project, called La Sal, in Lisbon Valley, Utah. In Kazakhstan, the Company is exploring over 6,000 km ² of the prolific Chu-Sarysu Basin. The company was incorporated in 1980 and is headquartered in Toronto, Canada.
NexGen Energy Ltd	TSX:NXE/ASX:NXG	NexGen Energy Ltd. is a Canadian company focused on delivering clean energy fuel for the future. It is engaged in the acquisition, exploration and evaluation of uranium properties in Canada. It is focused on optimally developing the Rook I Project. It has a portfolio of highly prospective projects, including its 100% owned Rook I property that is host to the high-grade Arrow Deposit. South Arrow, Harpoon, Bow, and the Cannon area. The Rook I Project is a development-stage uranium project in Canada. The new underground mine and mill development is located in the uranium-rich district of the southwestern area of the Athabasca Basin, located in Saskatchewan. Arrow is a 100% land-based, basement-hosted, and high-grade uranium discovery. The Rook I Project, host of the Arrow Deposit, which is a development-stage uranium project in Canada and is 100% owned by NexGen Energy Ltd. The Rook I property hosts the Harpoon Discovery located 4.7 km northeast of the Arrow Deposit. The company is headquartered in Vancouver, Canada.
Toro Energy Limited	ASX:TOE	Toro Energy Limited, together with its subsidiaries, engages in the exploration, evaluation, and development of uranium properties in Australia. The company also explores for nickel, gold, vanadium, and base metal deposits. Its flagship project is the Wiluna uranium project, which is centred on its planned processing facility located 30 km south of the town of Wiluna in the northern goldfields of Western Australia. The Project consists of the Centipede, Millipede, Lake Way uranium, its Theseus project is located near Lake Mackay on the Western Australian/Northern Territory border. It owns a 100% interest in two exploration licenses making the Theseus Uranium Project in northern Western Australia with JORC Mineral Resources; and interest in an incorporated joint venture with Deep Yellow Limited that owns prospective exploration tenure in Namibia, and equity and financial instruments in Strateco Resources Ltd, which owns the Matoush Uranium Project in Quebec, Canada. Toro Energy Limited is headquartered in West Perth, Australia.
Elevate Uranium Ltd	ASX:EL8	Elevate Uranium Ltd is an Australia-based uranium exploration company. The Company is engaged in the exploration and evaluation of its mineral tenements in Namibia and Australia and enhancing the value through the potential application of the Company's patented Upgrade uranium beneficiation process to those mineral tenements. Its Namibia tenements include Koppies, Hirabeb, Namib IV, Marenica Uranium Project, and Capri. The Company holds around ten active tenements in the Erongo Region of Namibia, each at varying stages of exploration advancement. The Koppies tenement (EPL 6987) is located in the Namib Desert region of Namibia. The Capri tenement (EPL 7508) is located in the Erongo uranium province in Namibia. In Australia, the Company's tenements consist of the 100% owned Angela, Thatcher Soak, Oobagooma and Minerva Projects and holdings in the Bigfry, Malawiri, Walbin and Areva Joint Ventures. The Angela tenement (EL25758) is a sandstone-hosted roll-front type uranium deposit. The company was formerly known as Marenica Energy Limited and changed its name to Elevate Uranium Ltd in May 2021. Elevate Uranium Ltd was incorporated in 1978 and is headquartered in West Perth, Australia.

Sources: Financial Times and S&P Capital IQ Pro.

Appendix C.2 Source for Company Resource Details

Company	Deposit/Project	Source
Berkely Energia Ltd	Salamanca	Page 59 of the Berkeley Energia Ltd 2024 Annual Report < https://announcements.asx.com.au/asxpdf/20240827/pdf/0673c5yzdps5ct.pdf >
Deep Yellow Limited	Namibian/Australian Projects	Pages 25 and 26 of Deep Yellow Presentation dated 15 November 2024 < https://announcements.asx.com.au/asxpdf/20241120/pdf/06bmfppn4x49zc.pdf >
Denison Mines Corp	Canadian Assets	Company Mineral Resource and Mineral Reserve statement < https://denisonmines.com/site/assets/files/6540/2023-mineral-reserves-and-mineral-resources.pdf >
Laramide Resources Ltd	US and Australian Assets	Page 28 of Laramide presentation dated December 2024 < https://wp-laramide-2023.s3.ca-central-1.amazonaws.com/media/2024/12/2024-12-Corporate-Presentation.pdf >
NexGen Energy Ltd	Rook	Page 31 of NexGen presentation dated February 2025 < https://s28.q4cdn.com/891672792/files/doc_presentations/2025/02/NXE_CorpDeck_Feb-2025.pdf >
Toro Energy Ltd	Wiluna	Various including < https://www.toroenergy.com.au/wp-content/uploads/2024/10/Homsany_Richard_Toro-Energy-Ltd.pdf >, < https://announcements.asx.com.au/asxpdf/20250206/pdf/06f7j6k264r1qp.pdf > and < https://announcements.asx.com.au/asxpdf/20240927/pdf/0668fn2jxj09df.pdf >
Lotus Resources Ltd	Kayelekera/Letlhekane	Page 32 of Lotus Presentation dated January/February 2025 < https://announcements.asx.com.au/asxpdf/20250128/pdf/06dw468ycvd40y.pdf >

Source: SRK analysis.

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