



GOLD FIELDS

10 March 2026

Clean Energy Regulator
NGER and Safeguard Branch
GPO Box 621
Caberra ACT 2601

Gold Fields Australia Pty Ltd
ABN 91 098 385 285

Level 4, 235 St Georges Terrace
Perth WA 6000

GPO Box 2731
Cloisters Square PO WA 6850

Tel: +61 (08) 9211 9200
www.goldfields.com

Dear Sir/Madam

RE: Gruyere Mine Site – Explanation for excess emission position exceeding 30% of baseline

Facility Name: Gruyere Mine Site

Responsible Emitter: Gruyere Mining Company Pty Ltd

Financial Year: 2024-25

1. Introduction

This letter provides a formal explanation from the Responsible Emitter of Gruyere Mine Site regarding the excess position and the level of carbon abatement undertaken during the specified reporting period and addresses the limitations, barriers and future opportunities of carbon abatement at the mine site.

The facility has two primary sources of carbon emissions: natural gas for electricity generation (51%) and diesel consumption for ore extraction and haulage (48%).

Gruyere Mine Site built and commissioned a 13.2 MW solar farm at the facility in 2022, and currently generates approximately 8% of its electricity consumed from the renewable source, with an annual abatement in carbon emissions of approximately 12,000 t CO₂-e. During the 2024/25 reporting period, Gruyere conducted a feasibility study to double the size of the solar farm, and taking the renewable penetration to approximately 18 to 20%, but, due to mine life constraints, the economics of the study deemed it unfeasible.

Diesel displacement, and hence carbon abatement from diesel consumption remains an ongoing challenge for the facility given the limitations in available alternative technologies.

2. Limitations in available technologies

2.1 The primary challenge faced by the facility in achieving emissions abatement from diesel consumption is related to the various constraints in the transition from diesel power to other lower emissions fuel sources or technologies for the movement of ore. These included:

- (a) **Technology Readiness Levels:** the current state of technology for electric mining equipment has not yet reached a level that can fully replace diesel vehicles and equipment without compromising operational efficiency and reliability. Electric alternatives for mining haul trucks are still in the early stages of development and are not widely available to the market.
- (b) **Infrastructure requirements:** the infrastructure necessary to support a fully electric fleet is not yet in place.
- (c) **Performance and durability:** Early prototype battery electric truck models trialled have indicated that the equivalent performance and durability standards of their diesel equal has not yet been met, thus compromising mining operations should they be rolled out in their current form.
- (d) **Battery technology:** current battery technology does not provide the necessary energy density required for demands of the mining industry.

3. Regulatory and other barriers

3.1 **Financial** - Expansions to the solar farm and the consideration for other renewables technologies (Wind) continue to be hampered by commercial hurdles due the life of mine being shorter than the hurdle rate for the investment.

The same can be said for the financial investment required to convert a diesel mining fleet to a fully battery electric fleet with all the required infrastructure upgrades, including power supply, charging infrastructure and associated equipment.

3.2 **Regulatory** – Gruyere have not identified any regulatory barriers that would impede emissions reduction activities at the facility.

4. Future opportunities for carbon abatement

4.1 Despite the abovementioned limitations and barriers, Gruyere is committed to exploring and implementation carbon abatement opportunities as applicable, by:

- (a) Continuing to monitor and invest in emerging low carbon technologies that are applicable to the facility.
- (b) Continue to monitor the cost of renewables and large-scale energy storage solutions that could be applicable at Gruyere; and
- (c) Revisit the business case for the above technologies where mine life extensions have been achieved.

5. Conclusion

5.1 While the challenges and barriers have affected the level of carbon abatement at the Gruyere mine site during the 2024/25 reporting period, the company remains committed to exploring opportunities and investing in appropriate studies and trials that could be reduce the scale of Scope 1 emissions at the facility in forthcoming reporting years.

Sincerely

DocuSigned by:

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Craig Bradshaw

Senior VP – Operations

Gold Fields Australia