NORTHERN STAR RESOURCES LTD

27th March 2026

Mr David Parker
Chief Executive Officer
Australian Government Clean Energy Regulator

Via upload to the CER portal

Dear Mr Parker,

Safeguard Mechanism Reform – Carbon unit surrender for for FY2023-2024 for Fimiston Operations (responsible emitter: KALGOORLIE CONSOLIDATED GOLD MINES PTY LTD)

This letter is intended as compliance with the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015, Part 4, Division 5 Surrender of prescribed carbon units, 72C Requirements for surrender of prescribed carbon units.

Under the above legislation, Northern Star Resources Ltd is in an excess emissions situation for the 2023-2024 financial year. The excess exceeds 30% of the Fimiston baseline of 136,847 tCO_{2e}.

1. Background:

1.1. Northern Star Resources commitment to Emission Abatement:

Northern Star Resources Ltd remains committed to the Paris Agreement and a Net Zero carbon future, on a 1.5°C pathway. Since announcing our Net Zero ambition on 21 July 2021, in February 2022 we outlined our decarbonisation pathway for achieving our 2030 Emissions Reduction Targets of 35% reduction in Scope 1 and Scope 2 Emissions on the way to achieving Net Zero operational Emissions by 2050.

In keeping with our commitment to reduce emissions whilst striving to deliver on our 5-year strategic growth plan we continually seek opportunities to build renewable energy projects and investigate options to enter into clean power purchase agreements to offset the potential emissions growth associated with our 5-year strategic plan.

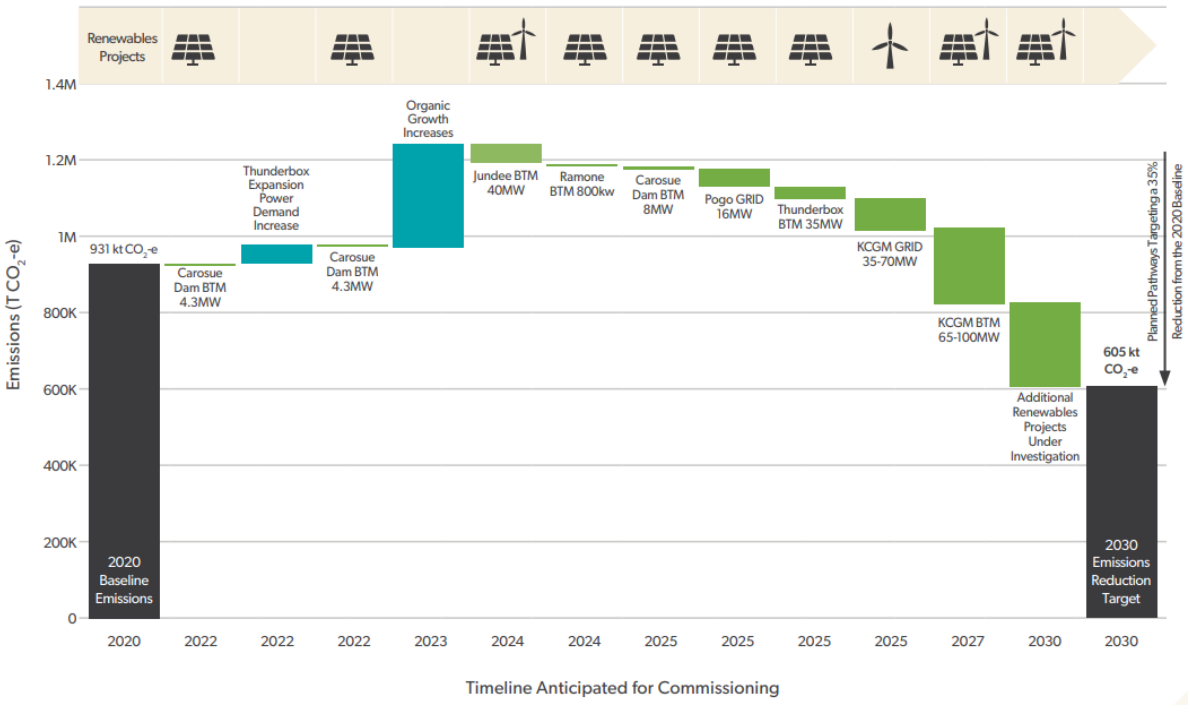

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Figure 1 - Northern Star Resources' Emissions Reduction Pathway

Some renewable energy facilities recently commissioned or currently under development include:

- **Carosue Dam Renewable Energy Project – Phase 1 and 2**. A 6-year PPA with Nomadic Energy – 6MW of Solar PV (5B) facility. Commissioned July 2023. A 5-year PPA with Pacific Energy – 8MW of Solar PV (SAT) facility. Commissioned February 2025.
- **Porphyry Renewable Energy Project**. A 10-year PPA with Aggreko – 5MW Hybrid Diesel/ Solar PV (5B)/ BESS facility. Commissioned January 2024
- **Jundee Renewable Energy Project**. A 15-year PPA with Zenith Energy Limited – 24MW Wind, 16MW Solar PV (5B), 12MWHr BESS. Due to be commissioned in FY25.

For further information please refer to Climate Change | Northern Star (nsrltd.com).

1.2. Fimiston's Production-Adjusted Baseline:

Under the Safeguard Mechanism, Northern Star Resources Ltd's Fimiston production-adjusted baseline was submitted and accepted by the regulator. The accepted Calculated Facility Emissions Intensity for ROM ore at Fimiston is **0.01262 tCO_{2e}/Tonne.**

The basis for this calculation is the FY2017-2018 to FY2021-2022 Scope 1 emissions data, with FY2018-2019 removed (lowest) and FY2021-2022 removed (highest).

Northern Star Resources Ltd is committed to a safe, sustainable and long-term mining operation and this means buttressing work is done as a priority and whenever required. Although this activity produces no ROM ore, it does require the use of heavy machinery and results in additional Scope 1 emissions.

Northern Star Resources Ltd committed to a larger cutback in the south of the Fimiston pit. This has increased the percentage of waste that is mined in the current operation. In addition, the longer haulage distances from the southern cutback to the stockpiles and processing plant have contributed to higher emissions without a proportional increase in ore moved; an effect that began in FY23 and continues.

Northern Star Resources Ltd purchased the Fimiston operations towards the end of FY21, hence the data used to calculate the Facility Emissions Intensity for ROM ore does not reflect the Northern Star Resources Ltd mining practices.

The majority of the Scope 1 emissions from the Fimiston Operations are the result of diesel fuel usage; the total usage by FY was:

FY18 – 68,455 kL
FY19 – 34,376 kL
FY20 – 49,098 kL
FY21 – 55,390 kL
FY22 – 69,224 kL
FY23 – 83,154 kL
FY24 – 83,457 kL

The impact of the transition to Northern Star Resources Ltd mining practices can be seen in the trend above.

1.3. Emission Abatement at Fimiston:

Northern Star Resources Ltd believes that, based on current technology readiness and availability, the greatest impact to reduction of our overall emissions from Fimiston Operations will be the development of a clean energy capacity.

In FY24, Northern Star Resources Ltd focussed on developing renewable energy project in Kalgoorlie. We identified potential locations around Kalgoorlie for a 200MW wind and 100MW solar farms, with a 60MW BESS for firming. In April 2024 a formal Expression of Interest (EOI) process was issued to identify the best development partner, with a view to entering a PPA for the renewable energy. Through a rigorous process of shortlisting, the preferred development partner was identified in November 2024.

Northern Star Resources Ltd is working actively with our development partner to progress this project and expect to commission the facility in FY27/FY28. Since Fimiston Operations are grid-connected, this will be a reduction in our Scope 2 emissions of over 400,000 tCO_{2e}/annum.

2. Response to Part 4, Division 5, 72C, (5)(b)(i) Limitations to Further Carbon Abatement – Technology Readiness:

The majority of the Scope 1 emissions from the Fimiston Operations are the result of diesel fuel usage, with ore haulage vehicles being the largest component. In order to abate emissions from these vehicles, suitable low-emission vehicles (such as electric, hybrid or hydrogen) need to be available and economic. The first step to achieve fleet electrification is the delivery of economic, low-emission energy to the Fimiston Operations, as described in 1.3 above.

Northern Star Resources Ltd has assessed the technology readiness level of low-emissions mining vehicles to be TRL8 at best. That is, there are limited demonstration vehicles in existence, but they are not commercially available.

3. Response to Part 4, Division 5, 72C, (5)(b)(ii) Regulatory Barriers:

Northern Star Resources Ltd has not identified any regulatory barriers in implementing Scope 1 emissions at the Fimiston Operations.

4. Response to Part 4, Division 5, 72C, (5)(c) Future Opportunities for Undertaking Carbon Abatement:

Northern Star Resources Ltd has engaged with a number of potential EV suppliers to identify the options for fleet transition. These include:

- Kovaterra
- Huber
- CAT
- Liebherr
- Komatsu
- Bluvein

Northern Star Resources Ltd has become a member of the CAT Pathways to Sustainability Project (Haul trucks at TRL8 - Demonstration models deployed).

Northern Star Resources Ltd is also a full partner in the Bluvein Dynamic Charging Consortium (dynamic charging of haul trucks, a research and development joint venture, equipment at TRL5-6 - Prototype ready for demonstration).

Northern Star Resources Ltd will continue to actively engage with these suppliers and stage our fleet transition when the technology reaches the appropriate level of readiness.

5. Response to Part 4, Division 5, 72C, (5)(d) Commercially Sensitive Information in this Submission:

None.

Yours sincerely

HILARY MACDONALD
Chief Legal Officer & Company Secretary
Northern Star Resources Ltd

CC Steve McClare-- Chief Technical Officer