Before an Expert Consenting Panel

Under the	Fast-track Approvals Act 2024
And	
In the Matter of	an application for approvals by Matakanui Gold Limited to establish, operate, rehabilitate and ultimately close an open pit and underground gold mining operation known as the Bendigo-Ophir Gold Project

Memorandum of Counsel on behalf of **Matakanui Gold Limited requesting suspension of processing under Section 64**

Dated: 25 June 2026

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MAY IT PLEASE THE EXPERT PANEL

Introduction

1. This Memorandum of Counsel is filed on behalf of Matakanui Gold Limited (**Matakanui Gold**) regarding the Bendigo-Ophir Gold Project (**BOGP**) Fast-track Approvals Act 2024 (**FTA**) application.

2. Counsel refers to Expert Panel Minute 37 issued on 25 June 2026 recording the outcomes of a touchpoint conference held on 23 June 2026 with the Expert Panel at the conclusion of the concurrent hearings.

3. As outlined in Minute 37, at the touchpoint conference Counsel advised that:

   (a) Following Mr Chrisp's proposal at the hearing on 18 June 2026 that further workshopping on conditions and management plans between planning experts for Kā Rūnaka, the regulators, and relevant parties would be beneficial, Matakanui Gold had intended to seek suspension of processing to enable this to occur. The intention of workshopping is to ensure the Panel has the most refined version of conditions possible for decision making.

   (b) In light of indications from the Expert Panel that it would imminently issue further requests for information, Matakanui Gold intended to factor the requests into the suspension of processing.

4. Matakanui Gold respectfully requests that the Expert Panel exercise its discretion to suspend the processing of the application under Section 64 of the FTA. Counsel considers this suspension could sensibly be effective from Friday 26 June 2026. A timeframe for the suspension is not sought at this time, however, following receipt of the further requests for information referred to in Minute 37 of the Expert Panel, Matakanui Gold will be able to assess and refine that.

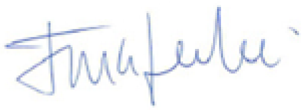
5. It is intended by Matakanui Gold that the workshopping process will continue during the suspension period under independent facilitation.

6. Matakanui Gold consents to the Expert Panel, its advisors and the Environmental Protection Authority continuing work on the application during the suspension period.

7. Matakanui Gold will meet all actual and reasonable cost recovery incurred by regulators in continuing to engage in the FTA process, including the proposed conditions and management plans workshopping, through the suspension period. Matakanui Gold also agrees to meet the reasonable costs for Sustainable Tarras' engagement of its planner during workshopping in the suspension period. This will

ensure all planners who have participated in the expert conferencing to date will have the opportunity to continue in the workshopping.

Dated 25 June 2026



Joshua Leckie / Charlotte Coyle / Mia Turner
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