

TECHNICAL REPORT SUMMARY INITIAL ASSESSMENT (S-K 1300 FORMAT) SARFARTOQ Nd-Pr RARE EARTH ELEMENT PROJECT

Sarfartoq Carbonatite Complex
West Greenland

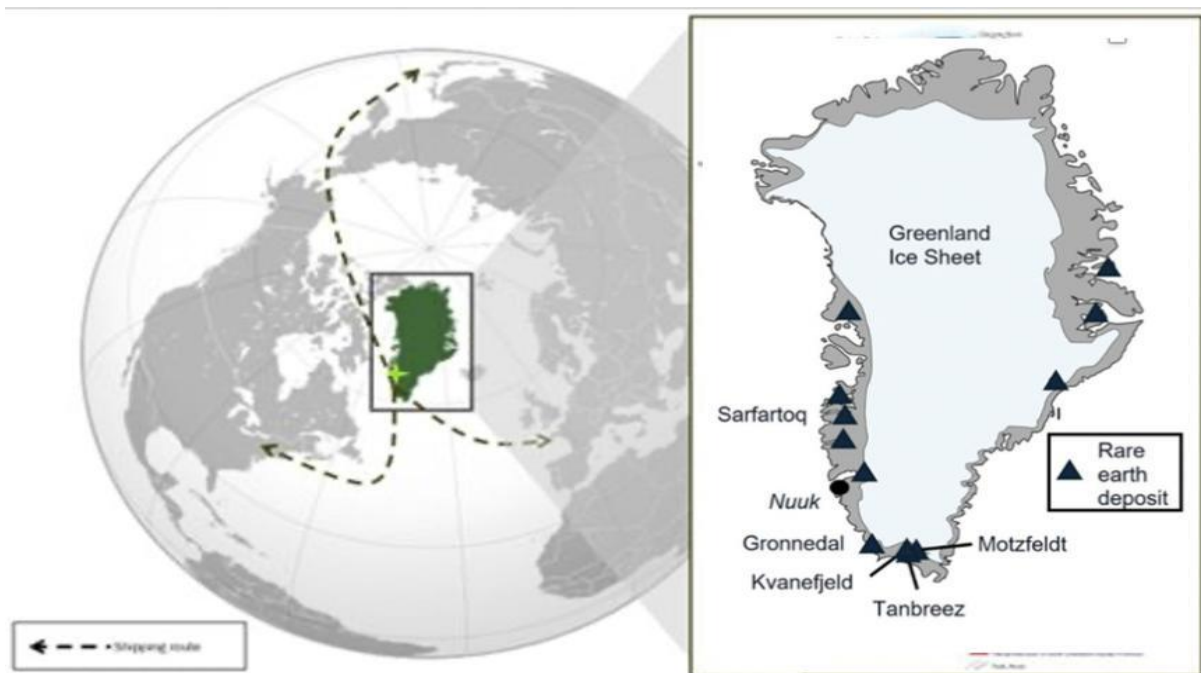
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U.S. SEC Regulation S-K, Subpart 1300 (§ 229.1300–229.1305) and Item 601(b)(96)
Technical Report Summary – Initial Assessment
23 August 2026

Drill rig at ST-1 deposit at the Sarfartoq Nd-Pr Rare Earth Element Project – outcropping mineralization in cliff walls.

Agricola Mining Consultants Pty Ltd ("Agricola") was requested by Greenland Mines Ltd ("GRML" or the "Company") to prepare an initial assessment of the Sarfartoq Rare Earth Project under subpart 1300 of Regulation S-K. The economic analysis in this report is founded exclusively on the estimated Mineral Resource for the ST1 deposit (Item 11) and evaluates a hybrid mine plan — an open pit followed by an underground operation — drawn wholly from that Mineral Resource. Exploration results at the satellite mineralized zones, and the potential for extensions below the volume already estimated, are reported as exploration information in Item 21 and Appendix G; no Mineral Resource has been estimated for either, and neither is scheduled or valued in the economic analysis.

Issuer / Registrant	Greenland Mines Ltd (GRML)
Qualified Person	Malcolm Castle, MAusIMM, Qualified Person/Competent Person (QP/CP Geo) — Agricola Mining Consultants Pty Ltd
Property	Sarfartoq Mineral Exploration Licence MEL 2020-32 (191.29 km ²), Sarfartoq Carbonatite Complex, West Greenland
Report type	Initial Assessment under § 229.1302(d) (preliminary; includes Inferred Mineral Resources in the economic analysis, subject to the conditions at § 229.1302(d)(4)(ii))
Basis of the economic analysis	Estimated Mineral Resources only — the ST1 open-pit and underground Indicated and Inferred Mineral Resources reported in Item 11, which on the re-cut hybrid model are spatially exclusive and additive. No conceptual material is scheduled or valued.
Economic model basis	Agricola Sarfartoq ST1 DCF v10 Fiscal Update 19 Aug 2026.xlsx, formula-driven 'Fiscal Update' schedule. Deterministic results and every case and sensitivity in this report are computed on that schedule, on the royalty base confirmed by the opinion of 19 August 2026. QP/tax-adviser confirmations remain as stated in Items 3.4 and 19.5.
Effective date	31 July 2026
Report date	23 August 2026

The ST1 deposit is located within the northern part of the Sarfartoq Carbonatite Complex in west-central Greenland. The deposit is hosted within a Mesoproterozoic to Neoproterozoic carbonatite intrusive complex (approximately 564 Ma) emplaced along the tectonic boundary between the Archaean North Atlantic Craton and the Palaeoproterozoic Nagssugtoqidian Orogen. The complex intrudes granodioritic gneisses and is characterized by a central carbonatite core surrounded by concentric ring intrusions, carbonatite dykes, breccias and extensive zones of fenitic alteration. This geological environment is typical of many globally significant carbonatite-hosted rare earth element (REE) deposits. ([GEUS Data](#))



Rare earth mineralisation at ST1 occurs principally within altered carbonatite and fenite developed along structural corridors within the northern sector of the complex. Mineralisation is closely associated with late-stage hydrothermal fluids that introduced REE-bearing carbonate and phosphate minerals into fractured and brecciated host rocks. The principal rare earth minerals include bastnäsite, synchysite and monazite, with subordinate thorium-bearing phases. The mineralisation is strongly enriched in light rare earth elements (LREE), particularly cerium (Ce), lanthanum (La), neodymium (Nd) and praseodymium (Pr), while heavy rare earth elements are present only in minor quantities. ([GEUS Data](#))

The ST1 mineralized zone comprises a series of steeply dipping to sub-vertical mineralized bodies controlled by fractures, breccias and carbonatite vein systems. Mineralisation exhibits good vertical continuity and remains open in several directions, indicating potential for additional resources with further drilling. The weathering profile is generally thin due to the Arctic environment, allowing fresh mineralisation to be exposed at surface and simplifying geological interpretation.

From a genetic perspective, ST1 represents a classic carbonatite-hosted rare earth deposit. Carbonatites are recognized globally as one of the principal primary sources of rare earth elements because they are highly enriched in incompatible elements during the final stages of magmatic evolution. Subsequent hydrothermal alteration commonly upgrades REE concentrations within structurally favorable zones through replacement and vein emplacement. The Sarfartoq Complex displays all these characteristic features, including carbonatite intrusion, pervasive fenitisation and structurally controlled hydrothermal mineralisation. ([U.S. Geological Survey](#))

The geological characteristics of the ST1 deposit support relatively consistent mineralogical and metallurgical behavior across the currently defined resource. The predominance of LREE carbonate minerals, together with the continuity of the mineralized zones, provides a sound geological basis for the Mineral Resource Estimate and the conceptual mining and processing assumptions adopted in this Technical Report Summary — Initial Assessment.

Management and the responsible QP confirm in writing that:

- commodity prices and material economic assumptions are current as of the end of the registrant's most recently completed fiscal year;
- the project-specific capital and operating-cost accuracy is approximately –50%/+50%;
- the stated 20% contingency is correct and does not exceed the SEC's 25% ceiling;
- the inferred-resource cautions appear with equal prominence; and
- results excluding inferred resources are disclosed with equal prominence where required.

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ITEM 1 — EXECUTIVE SUMMARY

This Technical Report Summary has been prepared to support the registrant's mining property disclosure under subpart 1300 of Regulation S-K (17 CFR §§ 229.1300 to 229.1305) and should be read together with the registrant's Form 10-K/20-F mineral property disclosure. It summarises the property, the basis of the assessment, and the principal results and conclusions of the report.

- Sarfartoq ST1 is a neodymium–praseodymium-rich, carbonatite-hosted rare earth property in West Greenland.
- This report documents an initial assessment as defined in § 229.1302(d). It is supported by an estimated Mineral Resource. No Mineral Reserve has been estimated, and none is declared.
- The economic analysis presented in Item 19 is founded exclusively on estimated Mineral Resources — the Indicated and Inferred Mineral Resources of the ST1 hybrid open-pit and underground scenario reported in Item 11. No material for which a Mineral Resource has not been estimated is scheduled in, or contributes to, that analysis.
- Exploration potential elsewhere on the Licence is described separately in Item 21 and Appendix G. It is exploration information only, it is not additive to the Mineral Resource, and it makes no contribution to the economic results reported in Item 19.

Status of this Technical Report Summary

This Technical Report Summary documents an Initial Assessment under subpart 1300 of Regulation S-K and is complete as to that assessment. The Mineral Resource reported at Item 11 is taken from the Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary (file 704-ENG.VMIN03496-01), effective 31 July 2026 and issued for use 16 August 2026, prepared by Ronald G. Simpson, P.Geo., of GeoSim Services Inc. and Hassan Ghaffari, P.Eng., M.A.Sc., of Tetra Tech Canada Inc. That estimate has been issued and signed by the Qualified Persons responsible for it, and the author of this Initial Assessment relies upon it.

The following matters are identified as work required to support a Pre-Feasibility Study and any future Technical Report Summary supporting the declaration of Mineral Reserves. They are not conditions precedent to this Initial Assessment.

Analytical quality control. Corroboration by an experienced geochemist of the 2023 quality-control conclusions, resolution of the systematic over-estimation of rare-earth grades at the primary laboratory relative to the check laboratory, and investigation of the elevated thorium failure rate (Item 9).

Personal inspection. Completion of a personal inspection of the property by the Initial Assessment Qualified Person, in conjunction with the next field campaign (Items 2.6 and 23).

Exclusion-zone inventory. A technical memorandum confirming the Mineral Resource sterilised by the 20 m exclusion zone, with a sensitivity at 10 m, 20 m and 30 m. The sterilised inventory at

Table 13-1a is presently derived by difference between the hybrid optimization before and after the exclusion zone was applied (Items 13.2.1 and 13.3.1). No economic value is attached to that material anywhere in this report.

Price-deck citation for the CIF Europe scenario. Substitution of the per-oxide assessments used in the CIF Europe Rotterdam delivered-price sensitivity scenario with assessments exported directly from the price reporting agencies, each carrying its series code, publisher, assessment date and specification (Item 19.8.1). That scenario is a sensitivity and forms no part of the reported base-case results; the base-case price deck at Item 16.5 is not affected.

Drilling-summary reconciliation. Reconciliation of the 2011 metres-sampled entry in the ST1 drilling summary against the drill database (Table 7-1). The annual figures sum correctly to the reported totals, and the matter does not affect the Mineral Resource estimate.

1.1 Introduction

This Technical Report Summary (the “report”) has been prepared by Agricola Mining Consultants Pty Ltd on behalf of Greenland Mines Ltd (“GRML”, the “registrant”) to provide an independent technical and preliminary economic assessment of the ST1 zone within the Sarfartoq Rare Earth Element Project, West Greenland, in accordance with subpart 1300 of Regulation S-K. It is based on an estimated Mineral Resource, conceptual mining and processing studies, preliminary engineering, market analysis and discounted cash-flow modelling. It documents an initial assessment only. No Mineral Reserve has been estimated.

An initial assessment is, by definition, preliminary in nature. It may include Inferred Mineral Resources in the economic analysis provided that the required cautionary disclosure is given. This report includes Inferred Mineral Resources in the Item 19 economic analysis, and the cautionary statement required by § 229.1302(d)(4)(ii)(A) is repeated throughout.

1.2 Property description

The Project is approximately 60 km southwest of Kangerlussuaq, 140 km northeast of Maniitsoq and 110 km southeast of Sisimiut. It lies within the Sarfartoq Carbonatite Complex of southern West Greenland and is held under Exploration Licence MEL 2020-32 (191.29 km²) in the Qeqqata municipality.

1.3 Geology and mineralisation

The Sarfartoq Carbonatite Complex hosts one of Greenland's largest carbonatite-related rare-earth systems, emplaced at approximately 565 Ma on the boundary between the Archaean North Atlantic Craton and the Palaeoproterozoic Nagssugtoqidian belt. On the 2025 reinterpretation, ST1 rare-earth mineralisation is hosted within subvertical ferrocarnatite dyke swarms of the outer ring structure of the complex; features previously mapped as radioactive shear zones are now interpreted as carbonatite dyke swarms, with the radiometric response reflecting thorium in the mineralized carbonatite (Item 6). Mineralisation is dominated by the

magnet rare earths neodymium and praseodymium, which together contribute the great majority of the property's potential economic value.

1.4 Exploration and Mineral Resources

Exploration comprises approximately 35,843 m of diamond drilling across the property, of which 94 core holes for 23,094 m inform the ST1 estimate, together with geological mapping, airborne and ground geophysics, geochemistry, metallurgical testing and environmental baseline work (Item 7).

The Mineral Resource for the ST1 zone has been estimated by Mr Ronald G. Simpson, P.Geo., of GeoSim Services Inc., with an effective date of 31 July 2026, and is reported in the technical report summary issued for use on 16 August 2026. The estimate is reported for three mining scenarios; this report adopts the hybrid open-pit and underground scenario and no other. In that scenario the open-pit component is bounded by the optimized pit shell, and the underground component lies beneath the base of that shell, separated from it by a 20 m exclusion zone, so that the two are spatially exclusive and are additive. The economic analysis in this report is founded on both, in the hybrid sequence described in Item 13.

Mineral Resource — ST1 zone, hybrid scenario, effective 31 July 2026	Tonnes (Mt)	TREO (%)	Pr ₆ O ₁₁ (ppm)	Nd ₂ O ₃ (ppm)
OPEN-PIT COMPONENT — above the base of the optimized pit shell				
Indicated	3.979	1.57	938	2,974
Inferred	3.329	0.67	429	1,441
UNDERGROUND COMPONENT — below the base of the pit shell, net of the 20 m exclusion zone				
Indicated	2.918	1.64	998	3,203
Inferred	2.012	1.45	809	2,526
TOTAL — Indicated	6.90	1.60	963	3,070
TOTAL — Inferred	5.341	0.96	572	1,850

Table 1-1. ST1 Mineral Resource statement, hybrid open-pit and underground scenario. Mineral Resources are reported exclusive of Mineral Reserves; no Mineral Reserve has been estimated. The open-pit and underground components are spatially exclusive and are additive; the total is 12.24 Mt at 1.32% TREO. Reported above a net smelter return cut-off of US\$92.22/t for the open-pit component and US\$141.22/t for the underground component. Component tonnages sum to 6.897 Mt Indicated against the 6.90 Mt printed in the MRE; the difference is rounding. The MRE also reports stand-alone underground and open-pit scenarios over overlapping volumes; those are alternatives, are not additive, and are not used in this report. See Item 11 for the full statement, cut-off basis and assumptions.

Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Measured Mineral Resource has been estimated. The open-pit Inferred Mineral Resource of 3.329 Mt at 0.67% TREO is retained as mill feed. It is mined within the open-pit shell during the open-pit phase, stockpiled, and reclaimed to the mill in Years 7 to 9 after underground mining is complete. It clears the incremental cut-off of 0.35% TREO applicable to material that has already been mined (Items 11.4, 13.4.1 and 18.3).

1.5 Mining

- A hybrid mine plan: a conventional truck-and-shovel open pit on the ST1 zone, followed by underground long-hole open stoping beneath the base of the optimized pit shell. Every tonne scheduled is drawn from the Mineral Resource reported in Item 11. Active open-pit and underground mining is scheduled from Years 1 through 7. Deferred low-grade

open-pit stockpile is reclaimed and processed in Years 7 through 9. The total scheduled processing life is nine years.

- A nominal processing rate of 1,400,000 t/a delivering 12.207 Mt of mill feed over a nine-year mine life at an average delivered head grade of 1.2591% TREO — 7.290 Mt (59.7%) from the open pit and 4.918 Mt (40.3%) from underground.
- Resource-to-ROM mine capture of 100% of each of the four components of the Mineral Resource: the open-pit Indicated, the open-pit Inferred, the underground Indicated and the underground Inferred. Capture across the whole Mineral Resource is accordingly 100%, measured against a Mineral Resource that is itself reported net of the 20 m exclusion zone at the open pit to underground interface, which sterilises approximately 136,000 tonnes. No allowance is made for sill or rib pillars within the stopping horizon (Item 13.5).
- Waste mined from the open pit is 2.7685 Mt over the open-pit life, taken from the mine production schedule in Item 13. Two strip ratios follow from that tonnage, and both are stated with their denominator: waste to Indicated open-pit ore is 0.70 : 1, and waste to total delivered open-pit ore, including the deferred Inferred stockpile, is 0.38 : 1. Neither is described as “the strip ratio” without its denominator. Total pit material movement is 10.058 Mt and is unchanged by the decision to retain the open-pit Inferred Mineral Resource as ore rather than waste; what changes is its classification. No waste is hauled in the underground phase; development waste is accounted for in the underground development capital.

No satellite-pit mining is scheduled, costed or valued in this report. Development of the satellite occurrences, and of the volume beneath the base of the underground inventory, would require the estimation of Mineral Resources for the relevant volumes before they could be scheduled; they are discussed as exploration potential in Item 21 and Appendix G. Details of the mine plan are given in Item 13.

1.6 Metallurgy and processing

Bench-scale test work by SGS Canada (Lakefield) demonstrates that conventional flotation is an effective beneficiation route for ST1 mineralisation. The flowsheet comprises crushing, fine grinding, flotation, and concentrate dewatering and bagging for export. On the adopted design basis — a mass pull to final concentrate of 9.7% and a TREO recovery of 63.6% — a delivered life-of-mine head grade of 1.2591% TREO produces a mixed rare-earth flotation concentrate grading approximately 8.25% TREO for shipment to an established third-party separation facility. The recovery, mass pull and concentrate grade adopted in the economic analysis are mutually consistent and reconcile to the life-of-mine mass balance in Item 14. The metallurgical basis is appropriate for an initial assessment; locked-cycle and pilot-scale testing are recommended before a pre-feasibility study (Items 10 and 14).

1.7 Infrastructure

The property benefits from favourable regional infrastructure, including proximity to the Kangerlussuaq's all-weather airport, access to deep-water fjord shipping, an existing exploration camp and established exploration logistics. Major production infrastructure — processing facilities, power supply (with a hybrid hydro/wind–diesel option under consideration), access roads, tailings storage and export facilities — remains conceptual and requires detailed engineering at the next stage (Item 15).

1.8 Environmental and permitting

The property remains at the exploration stage. Environmental baseline investigations are underway, and no material environmental constraint has been identified from the information reviewed; however, environmental and social baseline studies and permitting remain incomplete. Key permitting activities include an Environmental Impact Assessment, a Social Impact Assessment, management of naturally occurring radioactive material (thorium), a Mine Closure Plan and an Impact Benefit Agreement. Uranium concentrations are of the order of 5 ppm, below the 100-ppm threshold of the Greenland Uranium Act (Items 3 and 17).

1.9 Market assessment

The property would produce a mixed rare-earth flotation concentrate. Revenue is dominated by the magnet rare earths neodymium and praseodymium, which together account for approximately 84% of the in-concentrate basket value, with smaller contributions from terbium, dysprosium and gadolinium. A basket price of US\$51.88 per kilogram of contained TREO and a payability of 75.4% have been adopted, giving a net realised price of US\$39.14 per kilogram of contained TREO. Price assumptions were developed from recognised independent price-reporting agencies and published long-term forecasts and are set out in Item 16 and Appendix C. They represent reasonable assumptions for an initial assessment. The Qualified Person draws attention to Item 16.7: payability is derived from a processing toll rather than selected from a comparable range, and the toll is bracketed against Western producers' lodged accounts but is not yet quoted by a processor (Items 16.7.6 and 16.7.6.1).

1.10 Capital and operating costs

Initial capital is estimated at US\$409 million, including a contingency of 20% of direct capital. Life-of-mine capital, comprising initial capital, underground development capital, sustaining capital, a single tailings storage facility lift and closure, totals US\$673.0 million on the point estimate. Life-of-mine operating cost totals US\$1,264 million, an average of US\$103.5 per tonne of run-of-mine mill feed. These figures are generated by the locked financial model and tie exactly to Items 18 and 19.

Cost	Base Case
Initial capital (US\$M)	409
Life-of-mine capital (US\$M)	673
Life-of-mine operating cost (US\$M)	1,264
Average operating cost (US\$/t mill feed)	103.5

Cost centre	Unit basis	US\$/t of that tonnage	Life-of-mine US\$M
Mining — open pit, pit phase	Per tonne of open-pit ore mined; all-in contract rate inclusive of waste	6.00	23.8
Mining — underground	Per tonne of underground ore mined; inclusive of development, backfill and services	55.00	270.5
Reclaim and rehandle	Per tonne of deferred low-grade stockpile reclaimed	1.50	5.0
Processing	Per tonne of ROM mill feed	67.50	824.0
General and administration	Per tonne of ROM mill feed	9.00	109.9
Logistics	Per tonne of ROM mill feed	2.50	30.5
Total	Per tonne of ROM mill feed	103.5	1,264

Table 1-2. Capital and operating cost summary. Life-of-mine capital of US\$673.0 million comprises initial capital of US\$409.0 million, underground development capital of US\$138.0 million, sustaining capital of US\$65.5 million, a tailings storage facility lift of US\$22.5 million and closure of US\$38.0 million; the components sum exactly to the total. Every figure tie to Items 18 and 19 and is generated by the locked financial model. The estimates are of AACE International Class 5 accuracy; the accuracy range is stated at Item 2.8.

Unit operating cost varies across the life of mine: US\$85.00 per tonne in the open-pit years, US\$134.00 per tonne while the underground is in production, and US\$80.50 per tonne in the final years while the deferred low-grade stockpile is reclaimed.

1.11 Economic analysis

Cautionary statement required by 17 CFR 229.1302(d)(4)(ii)



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

This Initial Assessment is preliminary in nature and includes Inferred Mineral Resources that are considered too speculative geologically to have modifying factors applied to them that would enable them to be categorized as Mineral Reserves. There is no certainty that the results of this economic analysis will be realized. Inferred Mineral Resources comprise 43.6% of the mill feed scheduled in this analysis by tonnage, and 31.8% of the contained total rare-earth oxide. The results of the economic analysis excluding Inferred Mineral Resources are disclosed with equal prominence at Item 19.6.4 and, in the Executive Summary, at Item 1.12. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property.

Inferred Mineral Resources comprise 43.6% of the mill feed scheduled in this analysis by tonnage, and 31.8% of the contained total rare-earth oxide. The results of the economic analysis excluding Inferred Mineral Resources are disclosed in Item 1.12 with equal prominence to the results that include them.

Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property.

Economic evaluation was completed by discounted cash-flow analysis on an annual basis in constant second-quarter 2026 United States dollars, with no allowance for inflation, escalation or project financing. The analysis is founded exclusively on the Indicated and Inferred Mineral Resources scheduled in the ST1 hybrid mine plan.

The results are reported as a range. The estimates underlying an initial assessment are of AACE International Class 5 accuracy. The Low case combines a basket price 15% below the assumption with operating cost 15% above and capital cost 30% above; the High case combines a basket price 15% above with operating cost 15% below and capital cost 20% below. Each is a complete recomputation of the cash flow, with the ad valorem royalty, depreciation and taxation recalculated. Physicals, schedule and recovery are identical in all cases.

Economic result — ST1 hybrid mine plan, Mineral Resource only	Base Case
Life of mine (years)	9
Mill feed processed (Mt)	12.2
Delivered head grade (% TREO)	1.26%
Contained TREO in concentrate (t)	98,000
Gross revenue (US\$M)	5,070
Life-of-mine operating cost (US\$M)	1,260
Life-of-mine capital cost (US\$M)	670
Pre-tax NPV at 8% real (US\$M)	1,260
Pre-tax internal rate of return (%)	68.7%
After-tax NPV at 8% real (US\$M)	895
After-tax internal rate of return (%)	53.7%
After-tax payback from first production (years)	1.9

Table 1-3. Principal economic results (constant Q2 2026 US\$; 8% real discount rate). Derived entirely from estimated Mineral Resources. See Item 19.6. Results are rounded. The Base Case includes Indicated and Inferred resource.

After-tax net present value	Base Case (US\$M)
At 6% real discount rate	1,000
At 8% real discount rate	895
At 10% real discount rate	820
At 12% real discount rate	725

Table 1-4. After-tax net present value at a range of real discount rates. The 8% rate is the reference rate adopted for this report. Results are rounded. The Base Case includes Indicated and Inferred resource.

The full deterministic Low, Point and High economic range, including the corresponding results excluding Inferred Mineral Resources, is presented at Item 1.12.1.

A price scenario at the CIF Europe (Rotterdam) delivered tier is presented in Item 19.8 and summarised at Item 1.13 below. That scenario is a sensitivity analysis on commodity price. It is not the base case, and no result from it forms part of the results reported above.

1.12 Economic value-attribution case including and excluding Inferred Mineral Resources

Of the 12.207 million tonnes of mill feed scheduled in the economic analysis, 43.6% by tonnage is classified as Inferred Mineral Resource and contributes 31.8% of contained TREO.

On the current deterministic point estimate, excluding the Inferred component reduces after-tax NPV8 from US\$897 million to US\$605 million, a reduction of US\$291 million or 32.5%, and shortens the mine life from nine years to six. After-tax IRR falls from 53.7% to 50.2%.

Economic range — current. The composite Low and High cases have been recomputed through the 19 August 2026 fiscal engine on the confirmed invoice-sales-value royalty base and are reported with the point estimate at Item 19.6.2 and Item 19.7.4. The range is a deterministic parameter range constructed as set out in Item 19.6.1. It is not a probability distribution. The summary that follows presents rounded estimates consistent with the accuracy of the Initial Assessment Report.

The current deterministic point estimate including Inferred Mineral Resources is **pre-tax NPV8 of US\$1.26 billion, pre-tax IRR of 68.7%, after-tax NPV8 of US\$895 million and after-tax IRR of 53.7%**. The corresponding excluding-Inferred result is pre-tax NPV8 of US\$879 million, pre-tax IRR of 66.0%, after-tax NPV8 of US\$605 million and after-tax IRR of 50.2%.

Across the reported deterministic range, the High case **including Inferred Mineral Resources** returns a **pre-tax NPV8 of US\$2.1 billion, a pre-tax IRR of 118.6%, an after-tax NPV8 of US\$1.5 billion** and an after-tax IRR of 92.7%.

The corresponding High case **excluding Inferred Mineral Resources** returns a **pre-tax NPV8 of US\$1.5 billion, a pre-tax IRR of 117.5%, an after-tax NPV8 of US\$1.1 billion** and an after-tax IRR of 90.9%. The High case is a deterministic sensitivity case, not the base case, a forecast, a valuation, an estimate of Mineral Reserve economics or an indication that the High case will be achieved.

Inferred Mineral Resources comprise 43.6% of scheduled mill feed and contribute 31.8% of contained TREO. This Initial Assessment is preliminary in nature; no Mineral Reserves have been estimated, Mineral Resources do not have demonstrated economic viability, and there is no certainty that the economic assessment will be realized.

Current fiscal-update result	Including Inferred Mineral Resources	Excluding Inferred Mineral Resources
Pre-tax NPV at 8% real (US\$M)	1,257	879

Current fiscal-update result	Including Inferred Mineral Resources	Excluding Inferred Mineral Resources
Pre-tax internal rate of return (%)	68.7%	66.0%
After-tax NPV at 8% real (US\$M)	897	605
After-tax NPV at 10% real (US\$M)	806	550
After-tax internal rate of return (%)	53.7%	50.2%
After-tax payback (years)	1.9	1.9

Table 1-6. Current deterministic fiscal-update results including and excluding Inferred Mineral Resources. Both cases are based exclusively on estimated Mineral Resources and are presented with equal prominence in accordance with 17 CFR 229.1302(d)(4)(ii). The composite Low and High cases are given at Table 1-5 and Item 19.6.2. See Item 19.6.4.

1.12.1 Deterministic range of values

On the current deterministic point estimate, excluding the Inferred component reduces after-tax NPV8 from US\$897 million to US\$605 million, a reduction of US\$291 million or 32.5%, and shortens the mine life from nine years to six. After-tax IRR falls from 53.7% to 50.2%.

On the current deterministic point estimate, excluding the Inferred component reduces after-tax NPV8 from US\$897 million to US\$605 million, a reduction of US\$291 million or 32.5%, and shortens the mine life from nine years to six. After-tax IRR falls from 53.7% to 50.2%.

The Low, Point and High cases are deterministic, internally coherent combinations of the defined basket-price, operating-cost and capital-cost assumptions. They are sensitivity cases prepared from the approved financial model and are not probability-weighted outcomes, forecasts, targets, valuations or expected outcomes. The High-case results are stated below together with the equivalent excluding-Inferred results to show transparently the economic contribution of the Inferred component.

Including Inferred Mineral Resources — Low, Point and High cases			
	Low case (price –15%, operating cost +15%, capital +30%)	Point estimate (as assumed)	High case (price +15%, operating cost –15%, capital –20%)
Pre-tax NPV at 8% real (US\$M)	401	1,257	2,053
Pre-tax internal rate of return (%)	26.4%	68.7%	118.6%
After-tax NPV at 8% real (US\$M)	234	897	1,502
After-tax NPV at 10% real (US\$M)	182	806	1,372
After-tax internal rate of return (%)	19.4%	53.7%	92.7%
Excluding Inferred Mineral Resources — Low, Point and High cases			
	Low case (price –15%, operating cost +15%, capital +30%)	Point estimate (as assumed)	High case (price +15%, operating cost –15%, capital –20%)
Pre-tax NPV at 8% real (US\$M)	209	879	1,489
Pre-tax internal rate of return (%)	21.0%	66.0%	117.5%
After-tax NPV at 8% real (US\$M)	78	605	1,074
After-tax NPV at 10% real (US\$M)	46	550	997
After-tax internal rate of return (%)	13.1%	50.2%	90.9%

Table 1-5. Deterministic range of values — Low, Point and High cases, including and excluding Inferred Mineral Resources. Each case is a complete recomputation of the cash flow through the 19 August 2026 fiscal engine at the parameter combinations shown; the cases are constructed as set out at Item 19.6.1 and are not percentiles of a probability distribution. Results including and excluding Inferred Mineral Resources are presented with equal prominence in accordance with 17 CFR 229.1302(d)(4)(ii). Both cases are based exclusively on estimated Mineral Resources, and no Mineral Reserves have been estimated. See Item 19.6.4. Values have been rounded.

Qualified Person's Emphasis

The excluding-Inferred case is materially weaker. In the Low case it returns an after-tax net present value of US\$78 million at 8% real, US\$46 million at 10% real and US\$16 million at 12% real, and is negative at 15% real; its after-tax internal rate of return is 13.1%. The qualified person draws particular attention to this. The project as evaluated depends on Inferred Mineral Resources for a substantial part of its value, and there is no certainty that Inferred Mineral Resources will be up-

graded to a higher confidence category by further drilling. Targeted infill drilling on Inferred Mineral Resources is needed to increase drill density in selected priority areas and support a future resource-classification review. If supported by the resulting information and the responsible Qualified Person's subsequent estimation and classification, some Inferred Mineral Resource may be upgraded to Indicated Mineral Resource.

Notwithstanding these preliminary indicators, the absence of Mineral Reserves and the inclusion of Inferred Mineral Resources mean that economic viability has not been demonstrated. This report does not establish, and must not be read as establishing, that the property is economically viable.

Qualified Person Opinion — Range of values

I record that the economic analysis of the property for the purposes of subpart 1300 of Regulation S-K is the deterministic point estimate reported in Item 19.6.2, being an after-tax net present value at 8% real. The Low and High cases are coherent parameter scenarios computed on the same engine, physicals and schedule; they are sensitivity results, not forecasts, targets, valuations or probability-weighted outcomes. The probabilistic simulation carried in earlier revisions has been withdrawn it rested on a distribution set estimated before the corrected schedule, the revised capital estimate and the fiscal update, and it has not been re-estimated. No probabilistic or percentile outcome is reported in this revision.

1.13 Sensitivity and price scenario

The deterministic point estimate is US\$897 million after-tax NPV8, while the deterministic High case returns US\$1.502 billion after-tax NPV8. The High case is a sensitivity result within the defined Low/Point/High range, not the base case, a forecast or a valuation. The construction of the range and the corresponding excluding-Inferred results are set out in Item 1.12.1.

The analysis is dominated by revenue. In descending order, the value drivers are basket price, delivered head grade, operating cost and capital cost. A 30% fall in the basket price removes about 93% of the after-tax net present value, leaving US\$65 million; a 30% increase in capital cost removes about 17% of it.

Variable	-30%	-15%	Point estimate	+15%	+30%
Basket price	65	488	897	1,306	1,715
Delivered head grade	277	588	897	1,205	1,514

Variable	-30%	-15%	Point estimate	+15%	+30%
Operating cost	1,091	994	897	799	702
Capital cost	1,046	971	897	822	748

Table 1-7. After-tax net present value at 8% real (US\$M) on one-at-a-time variation. See Item 19.7.

At the point estimate, a 30% increase in basket price increases after-tax NPV8 to **US\$1.715 billion**, while a 30% decrease reduces it to **US\$65 million**. This one-at-a-time sensitivity is preliminary, includes Inferred Mineral Resources and should not be interpreted as demonstrating economic viability or establishing Mineral Reserves.

Payability is subject to negotiation with offtake counterparties. The result at payabilities from 60% to 85%, and its reconciliation to the derived 75.4% adopted in the base case, is set out as a ladder at Table 19-13 in Item 19.7.5. It is not repeated here.

Basket price and delivered head grade are not equivalent. Because the processing toll underlying payability is fixed in dollars per kilogram of contained oxide, a fall in price is borne entirely by the producer, whereas a fall in grade reduces gross revenue and the toll together. The project is therefore geared to price, and price exposure is the principal commercial risk identified in Item 22.8.

A CIF Europe (Rotterdam) delivered-tier price scenario has been recomputed through the 19 August 2026 fiscal engine. On the adopted US\$25.01 per kilogram delivered-tier toll stack it returns an after-tax NPV8 of US\$1,415 million including Inferred Mineral Resources and US\$992 million excluding them. It remains a commodity-price sensitivity and is not the base case, and the per-oxide assessments underlying it are to be sourced directly from the price reporting agencies before filing.

Status of the price scenario

The CIF Europe scenario is a sensitivity analysis using a variant of the commodity price. It is not the base case, and the base case reported at Item 1.11 is the only case described as such anywhere in this report. The per-oxide price assessments underlying the scenario are to be sourced directly from the price reporting agencies before filing. There is no certainty that the delivered Western premium will persist over the life of the project.

1.14 Principal risks

The principal risks are: completion of the Qualified Person's data-verification programme and site inspection; placement on the project record of the signed hybrid optimization model and the volumetric reconciliation between the open-pit and underground components; the geological confidence of the Inferred component, comprising 43.6% of scheduled tonnage and 31.8% of contained TREO; absence of a project-specific geotechnical, stope-design and ground-support basis for the underground rate; application of 5% dilution to underground long-hole stoping; metallurgical performance at pilot scale; rare-earth price volatility and substantiation of the processing toll; confirmation of fiscal terms in the exploitation licence; a standalone reliance confirmation from BDO in respect of its opinion of 19 August 2026; confirmation of the asset-class allocation and qualifying-freight components; preservation of tax losses following the proposed shareholder change; permitting and the Exploitation Licence; Arctic infrastructure; Licence-transfer approval; and financing. A full discussion is given in Item 22.8.

1.15 Recommendations

The Qualified Person recommends a prioritized programme of technical, engineering, metallurgical, commercial, environmental and permitting work to support a future Pre-Feasibility Study. The scope, timing and cost of that work is supplied by the registrant. The programme is set out in Item 23, ordered by priority and separated into work required to confirm the Mineral Resource and the study basis, and work contingent upon it.

1.16 Qualified Person's opinion

In the Qualified Person's opinion, the Sarfartoq ST1 property is a technically credible rare-earth development opportunity in a stable Western jurisdiction, supported by favourable geology, a high neodymium–praseodymium proportion within the rare-earth distribution, extensive drilling, an estimated Mineral Resource, and encouraging preliminary metallurgy. The initial assessment reported in Item 19 is founded exclusively on estimated Mineral Resources and returns positive preliminary economic indicators. The property nonetheless remains at an early stage: no Mineral Reserve has been estimated, the economic analysis includes Inferred Mineral Resources, the underground component of the plan rests on benchmark cost and dilution assumptions that have no site-specific engineering behind them, and economic viability has not been demonstrated. Subject to completion of the recommended programme, the Qualified Person considers the property to warrant advancement to a pre-feasibility study.

1.17 Exploration potential outside the ST1 Mineral Resource

The Licence contains extensive exploration ground beyond the ST1 Mineral Resource: the ST40 occurrence, the ST1–ST40 corridor, the further carbonatite-hosted occurrences ST19, ST24, ST31, ST37 and ST43, and the volume beneath the base of the underground inventory scheduled in this report. No Mineral Resource has been estimated for any of that ground.

None of it contributes to the Mineral Resource statement in Item 11, to the mine plan in Item 13, to the cost estimates in Item 18, or to the economic analysis in Item 19. It is described as exploration information in Item 21, and the registrant's conceptual long-life development plan

is described qualitatively in Appendix G. Appendix G is not an initial assessment and contains no economic analysis, no net present value and no internal rate of return. Nothing in it is additive to, or may be combined with, the results reported in Item 19. Appendix B, which formerly presented a valuation of the exploration ground, has been withdrawn from this report.

1.18 Exploration Target — not a Mineral Resource

Two exploration targets have been identified on the Licence: the ST40 occurrence, and the ground beneath the base of the underground component of the hybrid Mineral Resource. Neither is a Mineral Resource.

The exploration targets are disclosed in full at Item 7.10. That Item is the single separately captioned section contemplated by 17 CFR 229.1302(c)(2). It states the ranges of approximate tonnage and approximate grade, the basis for each target, the exploration programme proposed to test them and the timeframe for that programme, and it carries the four cautionary statements required by paragraphs (c)(2)(i) to (iv) and the four content requirements at paragraphs (c)(3)(i) to (iv). The disclosure is not repeated here, and no tonnage, grade or quantity for the exploration targets is stated in this Executive Summary.

A third area, comprising the ST1–ST40 corridor and the further carbonatite occurrences ST19, ST24, ST31, ST37 and ST43, is considered prospective but no exploration target is stated for it. See Item 7.10.

Exploration target — mandatory cautionary statement

The exploration targets are conceptual in nature. There has been insufficient exploration of the relevant ground to estimate a Mineral Resource. It is uncertain whether further exploration will result in the estimation of a Mineral Resource. The exploration targets do not represent, and should not be construed to be, an estimate of a Mineral Resource or a Mineral Reserve. No economic value, net present value, internal rate of return or payback period is attributed to the exploration targets, and no part of the targets contributes to the Mineral Resource statement, mine plan, capital estimate or economic analysis.

ITEM 2 — INTRODUCTION

Introduction Summary

- Technical Report Summary — Initial Assessment, subject to completion of the filing conditions identified in this report.
- Prepared by Agricola Mining Consultants for Greenland Mines Ltd as an Initial Assessment in S-K 1300 Technical Report Summary format.
- Qualified Person: M J Castle, MAusIMM
- Effective date 31 July 2026; metric units; real US\$; reliance on registrant information is disclosed in Item 25.

This Technical Report Summary has been prepared by Malcolm Castle of Agricola Mining Consultants Pty Ltd, the Qualified Person responsible for the TRS. The author takes responsibility for the entirety of this TRS other than the mineral resource estimate in Item 11. In respect of that estimate, the author has relied upon Mr. R. Simpson, the independent Qualified Person responsible for the Sarfartoq Mineral Resource Estimate Technical Report Summary dated 31 July 2026 (the ‘MRE TRS’), a standalone technical report summary. The author has reviewed the MRE TRS, considers the estimate and the Qualified Person responsible for it to be appropriate and reliable for the purposes of this TRS, and has relied upon it for the resource disclosure in Item 11 and for any disclosures dependent on it.

This Technical Report Summary — Initial Assessment (IAR) has been prepared for Greenland Mines Ltd (GRML) to provide an independent technical and preliminary economic assessment of the ST1 Zone within the Sarfartoq Nd–Pr Rare Earth Element Project in West Greenland. It follows the content and organization prescribed for an Initial Assessment under SEC Regulation S-K 1300. It is intended for client review and presentation; it may support public disclosure only after the responsible Mineral Resource Qualified Persons have signed this TRS and the completion conditions identified in Items 6, 9, 13, 15 and 23 have been resolved.

The assessment is based on the issued Mineral Resource Estimate Technical Report Summary effective 31 July 2026 and on a preliminary economic evaluation of the potential development of the ST1 Zone. No Mineral Reserve has been estimated, and the economic analysis remains conceptual. Responsibility for the Mineral Resource disclosure is allocated to the Qualified Persons identified in Items 11, 25 and the Date and Signature Page; their dated signatures and consents must accompany this TRS before SEC filing.

The assessment is founded on information provided by Greenland Mines Ltd, historical exploration data, metallurgical testwork, the issued 2026 Mineral Resource Estimate Technical Report Summary and publicly available information. Technical information is presented using



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

metric units and constant US dollars. Where filing support remains incomplete, the limitation and required completion action are stated expressly rather than treated as resolved.

This section establishes the purpose, scope, effective date, authorship, and technical basis of the report, providing the framework for the detailed geological, engineering, metallurgical, environmental, marketing and economic assessments presented in the subsequent sections.

“This Technical Report Summary has been prepared by Malcolm Castle of Agricola Mining Consultants Pty Ltd, the Qualified Person responsible for the TRS.

The author takes responsibility for the entirety of this TRS other than the mineral resource estimate in Item 11. In respect of that estimate, the author has relied upon Mr. R. Simpson, the independent Qualified Person responsible for the Sarfartoq Mineral Resource Estimate Technical Report Summary dated 31 July 2026 (the ‘MRE TRS’), a standalone technical report summary.

The author has reviewed the MRE TRS, considers the estimate and the Qualified Person responsible for it to be appropriate and reliable for the purposes of this TRS, and has relied upon it for the resource disclosure in Item 11 and for any disclosures dependent on it.”

2.1 Issuer and project

This Technical Report Summary — Initial Assessment (IAR) has been prepared by Agricola Mining Consultants Pty Ltd (Agricola) for Greenland Mines Ltd (GRML; Nasdaq: GRML), the issuer, in respect of the Sarfartoq Nd–Pr Rare Earth Element Project (ST1 Zone), Qeqqata municipality, West Greenland. The report is prepared in the format of an Initial Assessment Technical Report Summary under subpart 1300 of Regulation S-K (S-K 1300) of the United States Securities and Exchange Commission.

2.2 Purpose and terms of reference

The purpose of the report is to provide an independent technical and economic assessment of the ST1 Zone on an initial-assessment basis. The assessment estimates a Mineral Resource (Item 11) but no Mineral Reserve; the economic analysis (Item 19) is preliminary and conceptual and is subject to the cautionary statements in Items 1, 19 and 22.

2.3 Qualified Person and responsibilities

The report has been prepared by a Qualified Person (QP): **Malcolm J Castle** (BSc Hons (Applied Geology UNSW), GCertAppFin (Sec Inst), MAusIMM Competent Person (Geo), Principal Consultant, Agricola Mining Consultants Pty Ltd — lead QP, responsible for the IAR other than the Mineral Resource estimate.

The QP is a qualified person as defined in S-K 1300 by virtue of education, professional registration and relevant experience, and is independent of GRML. The QP’s detailed qualifications and professional registrations are set out in the Date and Signature Page.

2.4 Effective date



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

The effective date of this report is 31 July 2026, which is also the Mineral Resource Estimate Report and commodity-price basis date (Item 16).

Subsequent fiscal information. On 19 August 2026 the registrant supplied a written opinion on royalty, tax offset and depreciation prepared by BDO Statsautoriseret Revisionspartnerselskab, Nuuk (Claus Bech) with NunaLaw, addressed to Major Precious Greenland A/S, a wholly owned Greenland subsidiary of Greenland Mines Ltd. It supersedes the registrant’s summary of the same advice dated 18 August 2026. The opinion post-dates the effective date and is treated as registrant-provided interpretation of statutory and regulatory matters under 17 CFR 229.1302(f)(1)(iii). It is given based on Greenlandic law in force at its date, is expressly limited to the matters stated in it, and is not addressed to the Qualified Person; a standalone reliance confirmation has been requested from BDO. The financial-model implementation of the confirmed positions, the asset-class allocation, the eligibility of the freight component and the re-run of all downstream sensitivities remain completion items.

2.5 Units, currency and terminology

Units are metric (SI): mass in tonnes (t), distance in meters (m), and grade as per cent total rare earth oxide (% TREO) and per-element oxide. Monetary amounts are in real (constant) United States dollars (US\$) unless otherwise stated. “REO” denotes rare earth oxide and “TREO” total rare earth oxide; “NdPr” denotes neodymium plus praseodymium.

2.6 Personal inspection

Personal inspection.

The Qualified Person responsible for this Initial Assessment, Malcolm Castle of Agricola Mining Consultants Pty Ltd, has not personally inspected the Sarfartoq Property. That is stated expressly, and the reason and the basis of reliance are set out below. Personal inspections have been completed by others and are relied upon: Mr Ronald G. Simpson, P.Geo., of GeoSim Services Inc., the independent Qualified Person responsible for the Mineral Resource Estimate, inspected the Property on 7–9 September 2010 and collected three core samples from two drill holes for independent check analysis (ACME Laboratories), the rare-earth results of which were consistent with the reported intervals; Dr M. Druecker, author of the 2011–2012 technical reports, inspected the Property on multiple occasions during the Hudson programmes; and the 2023–2024 field, sampling and QA/QC programmes were managed and verified on site by Mr J.M. Felsman of Felsman Geologic Services LLC.

Requirement. Subpart 1300 of Regulation S-K requires a Technical Report Summary to disclose the date and details of the personal inspection of the property by each qualified person or, if a personal inspection has not been completed, the reason why. This subsection is provided in satisfaction of that requirement. No view is expressed in this report as to whether a personal inspection is required in any circumstance; that is a matter on which the registrant should take advice from counsel.

Status. At the effective date of this report the Qualified Person responsible for this Initial Assessment (Malcolm Castle) had not undertaken a personal inspection of the Sarfartoq Project.



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

Reason a personal inspection has not been completed. The Project is approximately 60 km southwest of Kangerlussuaq, 140 km northeast of Maniitsoq and 110 km southeast of Sisimiut. It lies in a remote part of central West Greenland with no road access and no permanent infrastructure. The exploration camp used for the 2023 and 2024 field programmes has since been demobilized, and there is at present no accommodation, fuel or field support established at the site. Access to the property is available only by chartered helicopter or fixed-wing aircraft mobilized for an active field campaign and is confined to a short summer season; no charter aviation is currently scheduled to the property. In these circumstances a dedicated site inspection could not be arranged within the timetable for this report.

The Qualified Person has, however, more than 50 years of professional geological and mining experience and has extensive recent experience in Greenland through ongoing technical advisory, due diligence and Qualified Person assignments on the nearby Tanbreez and SILA Rare Earth Projects in southern Greenland. These assignments have included numerous visits to Greenland, direct inspection of comparable rare earth mineralisation, evaluation of regional geology, mining conditions, logistics, environmental setting, infrastructure requirements and the Greenland regulatory framework governing exploration and mine development.

Although the Sarfartoq Project is in a different geological province from the Tanbreez and SILA projects, the Qualified Person is familiar with the practical aspects of undertaking mineral exploration and mine development in Greenland, including transport logistics, climatic conditions, environmental permitting, infrastructure constraints and regulatory requirements administered by the Government of Greenland.

This Initial Assessment has been prepared primarily as an independent technical and economic evaluation of an updated Mineral Resource Estimate prepared by a separate Qualified Person responsible for the Mineral Resource Estimate. The Qualified Person preparing this Initial Assessment has relied upon the updated geological model, Mineral Resource Estimate, supporting technical reports, historical exploration database, metallurgical testwork, engineering studies and other technical information provided by the Registrant and the Mineral Resource Qualified Person. These data have been reviewed for internal consistency and reasonableness in accordance with the requirements of SEC Regulation S-K 1300.

In the opinion of the Qualified Person, the absence of a current personal inspection does not materially affect the conclusions reached in this Initial Assessment. The Report does not reinterpret the underlying geological database or prepare the Mineral Resource Estimate; its principal technical conclusions rest on the independently prepared Mineral Resource Estimate (Item 11), the quality-assurance/quality-control and drill-core review summarized in Appendix F, drill-core photographs, logs and analytical certificates, and prior inspections of the property — including the site visit by the Qualified Person responsible for the Mineral Resource Estimate (R.G. Simpson, September 2010; Appendix F) and multiple visits by earlier authors. The Qualified Person has also relied on the reliance framework set out in Item 25 and has extensive recent Greenland field experience on comparable projects, as described above.

The Qualified Person recommends that a personal inspection of the Sarfartoq Project by the Initial Assessment Qualified Person be completed in conjunction with the next field campaign

and, in any event, before completion of a Pre-Feasibility Study or any future Technical Report Summary supporting the declaration of Mineral Reserves. That inspection is listed in the recommended work programme at Item 23. It should include verification of the geological setting, infrastructure corridors, proposed mining areas, processing-plant and tailings-storage locations, and environmental constraints.

2.7 Sources of information and reliance

The report is based on data and information provided by GRML and the historic operators, the SGS Lakefield metallurgical test-work (Item 10), the Mineral Resource work (Item 11), and public and published sources (Item 24). The QP has relied on GRML for certain title, legal, marketing, environmental and fiscal information, as set out in Item 25; the data verification and its limitations are described in Item 9.

2.8 Accuracy of Estimates

This Technical Report Summary presents the results of an Initial Assessment as defined in Subpart 1300 of Regulation S-K. An Initial Assessment is a conceptual study of the potential viability of mineral resources. It is preliminary in nature: it includes Inferred Mineral Resources that are considered too speculative geologically to have modifying factors applied that would enable them to be categorized as Mineral Reserves, no Mineral Reserves are declared, and there is no certainty that the results of the economic analysis presented in Item 19 will be realized. The results of this report must not be used as the basis for a decision to proceed to production.

The capital and operating cost estimates presented in Items 18 and 19 are based on the limited project definition associated with AACE International Class 5 (Recommended Practice 18R-97). AACE classification describes estimate maturity, and its generic ranges are contextual rather than a substitute for the specific S-K 1300 requirement. For regulatory reporting in this Initial Assessment, the adopted overall accuracy envelope for both capital and operating costs is approximately -50% to +50%. A contingency of 20% of direct initial capital is included.

The estimate remains conceptual and is suitable for screening and study-stage decisions only; it is not suitable for financing or a production decision. The responsible QP must confirm this project-specific accuracy statement before SEC filing.

Table 2-1. AACE International cost estimate classification matrix (after AACE RP 18R-97).

<i>Estimate Class</i>	<i>Degree of project definition</i>	<i>Typical end usage</i>	<i>Expected accuracy — low range</i>	<i>Expected accuracy — high range</i>
<i>Class 5</i>	<i>0% – 2%</i>	<i>Concept screening, Initial Assessment</i>	<i>L: –20% to –50%</i>	<i>H: +30% to +75%</i>
<i>Class 4</i>	<i>1% – 15%</i>	<i>Study or feasibility</i>	<i>L: –15% to –30%</i>	<i>H: +20% to +50%</i>
<i>Class 3</i>	<i>10% – 40%</i>	<i>Budget authorization or control</i>	<i>L: –10% to –20%</i>	<i>H: +10% to +30%</i>
<i>Class 2</i>	<i>30% – 75%</i>	<i>Control or bid/tender</i>	<i>L: –5% to –15%</i>	<i>H: +5% to +20%</i>
<i>Class 1</i>	<i>65% – 75%</i>	<i>Check estimate or bid/tender</i>	<i>L: –3% to –10%</i>	<i>H: +3% to +15%</i>

Shaded rows identify the generic AACE Class 5 context. AACE RP 18R-97 notes that the accuracy range for a class varies with project-specific technological complexity, reference-data quality and risk. For this Initial Assessment, the regulatory reporting envelope adopted under 17 CFR 229.1302(d)(4)(i) is approximately –50% to +50% for capital and operating costs, with 20% contingency on direct initial capital. The wider generic AACE high-side range shown in Table 2-1 is not the accuracy claimed for this report.

The reader should interpret all economic outcomes in this report — including net present value, internal rate of return, and payback — in the context of this accuracy envelope.

The sensitivity analysis in Item 19 illustrates the effect on the economic results of variations in the principal inputs across ranges consistent with this level of study. Estimates of this class are suitable for concept screening, for assessing whether the Project merits advancement to the next stage of study, and for identifying the technical work required to improve estimate confidence; they are not suitable for project financing commitments or production decisions, which would require estimates of Class 3 or better supported by Pre-Feasibility or Feasibility level engineering.

Regulatory accuracy statement — subject to QP confirmation before filing: the estimate maturity is AACE Class 5; the project-specific S-K 1300 reporting accuracy is approximately –50% to +50%; and contingency is 20% of direct initial capital. These parameters are appropriate only for an Initial Assessment and concept screening.

Basis of reporting, currency and forward-looking information

Initial Assessment caution. This Initial Assessment is preliminary in nature. It includes, for the purpose of the economic analysis in Item 19, Inferred Mineral Resources that are considered too speculative geologically to have economic considerations applied to them that would enable them to be categorized as Mineral Reserves. There is no certainty that the results in this Initial Assessment will be realized. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. This Initial Assessment does not constitute, and must not be represented as, a pre-feasibility study or a feasibility study.

Mineral Resource compliance and reliance. The Mineral Resource Estimate relied upon in this Initial Assessment is the 2026 Sarfartoq Mineral Resource Estimate prepared by Mr. R.G. Simpson, P.Geo., of GeoSim Services Inc., reported in "Greenland Mines Ltd — Sarfartoq Rare Earth Element Project, West Greenland: Mineral Resource Estimate Technical Report Summary", effective 31 July 2026. The open-pit and underground inventories in that estimate are alternative treatments of the same mineralized body and are not additive. No Mineral Reserves have been estimated for the Sarfartoq Project; the project does not yet support Mineral Reserve estimation.

Forward-looking information. Statements regarding mine plans, throughput, capital and operating costs, product prices, recoveries, payabilities and projected economics are forward-looking and are subject to material risks and uncertainties. Actual results may differ materially. Any sensitivity, scenario or Upside Case results presented in this report are preliminary in nature and are not to be construed as forecasts, valuations or reserve-level economics.

Currency and units. Monetary values are in United States dollars (US\$) unless stated otherwise. The metric (SI) system is used throughout. Grades are reported as Total Rare Earth Oxide (TREO) and as individual rare earth oxides; magnet-feed oxides of primary interest are praseodymium (Pr_6O_{11}), neodymium (Nd_2O_3), terbium (Tb_4O_7) and dysprosium (Dy_2O_3).

Detailed cautionary statements specific to the mine plan, the Mineral Resource, the cost estimates and the economic analysis appear at the end of Items 1, 11, 12, 13, 16, 18, 19, 20 and 21.

ITEM 3 — PROPERTY DESCRIPTION

Property Description Summary

- Held under exploration Licence MEL 2020-32 (191.29 km²) over the Sarfartoq Carbonatite Complex.
- The acquisition of the Licence-holding entity is conditional on Government of Greenland approval.
- Governed by the Mineral Resources Act and the Uranium Act; the low uranium content is favorable.

The Sarfartoq Nd–Pr Rare Earth Element Project is located within the Sarfartoq Carbonatite Complex in southwest Greenland and is held under Mineral Exploration Licence MEL 2020-32, covering approximately 191.29 km². The ST1 Zone forms part of a series of rare earth mineralized zones developed along the outer ring structure of the carbonatite complex and represents the principal focus of this Technical Report Summary — Initial Assessment.

The Project is currently at the exploration stage, with exclusive exploration rights held through Qaatsuitsup Ulloriaa, a subsidiary of Neo North Star Resources. Greenland Mines Ltd (GRML) has entered into a definitive agreement to acquire the Licence-holding company, with completion subject to Government of Greenland approval. Development of the Project will require the grant of a separate Exploitation Licence following completion of the statutory environmental, social and permitting processes under the Greenland Mineral Resources Act.

The report summarizes the Project's ownership, mineral tenure, royalty framework, offtake arrangements, permitting pathway and regulatory environment, including considerations relating to radioactive elements under Greenland's Uranium Act. The Qualified Person considers the mineral title to be appropriate for a project at the current exploration stage, while noting that completion of the corporate acquisition and future granting of an Exploitation Licence remain key milestones before mining operations can commence.

3.1 Location

The Sarfartoq Nd–Pr rare-earth project lies in the Qeqqata municipality of southern West Greenland, within the Sarfartoq Carbonatite Complex. The Project is approximately 60 km southwest of Kangerlussuaq, 140 km northeast of Maniitsoq and 110 km southeast of Sisimiut.

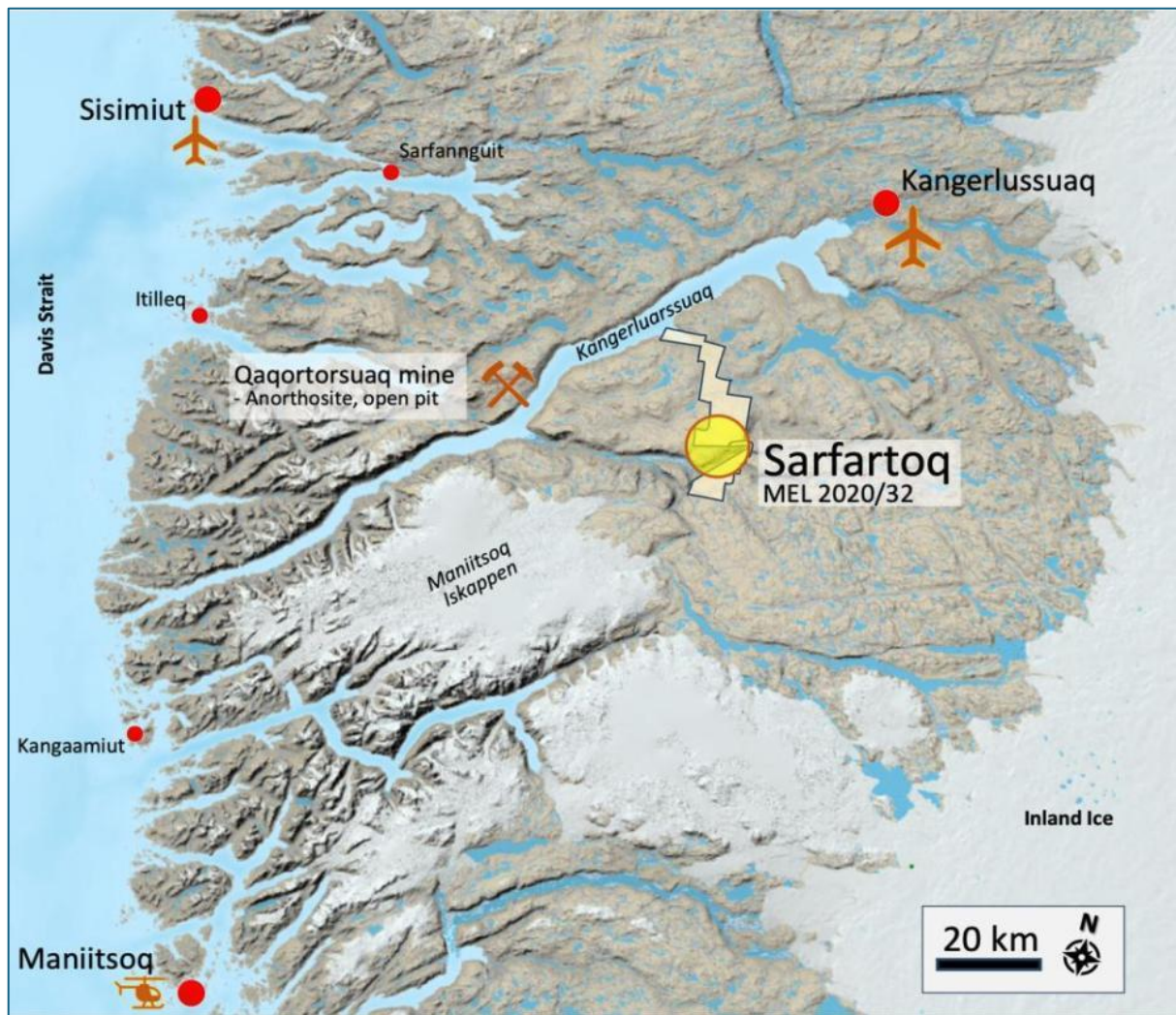


Figure 3-1. Location of Sarfartoq exploration Licence MEL 2020-32.

3.2 Mineral tenure and title

The project is held under mineral exploration Licence MEL 2020-32. On 9 May 2023 the Licence was transferred from Hudson Resources Inc. to Qaatsuitsup Ulloriaa (the Greenland branch of Neo North Star Resources, Inc.), and on 13 June 2024 a Licence expansion to include a proposed access route and harbor increased the area to 191.29 km². The Licence is the only Licence held by NNSR and covers the known extent of the Sarfartoq Carbonatite Complex, except for the Arnangarnup Qoorua protected area.

Under the Greenland Mineral Resources Act an exploration Licence is exclusive, is granted for an initial five-year period (renewable in further periods), and carries minimum annual exploration-expenditure and area-based fee obligations; it confers the exclusive right to explore but not the right to mine, which requires a separate exploitation Licence (Item 3.5). The Terms of Reference required to convert the Exploration Licence to an Exploitation Licence have not yet been prepared, and the tenure remains at Exploration-Licence stage.

Mineral Tenure Summary	
Item	Detail
License	Mineral exploration license MEL 2020-32 (application M-MLSA-254)
License type	Exploration (exclusive) - not an exploitation/mining license
Registered holder	Qaatsuitsup Ulloriaa (Greenland branch of Neo North Star Resources, Inc.)
Area	191.29 km ² (following the 13 June 2024 expansion to include a proposed access route and harbour)
Grant / Transfer / Expiry	- MEL 2020-32 granted 1 March 2020. License expansion to include a proposed access route and harbor was approved on 13th of June 2024. Transfer of MEL 2020-32 from Hudson Resources → Qaatsuitsup Ulloriaa (the Greenland branch of Neo North Star Resources Inc.) granted 3 May 2023. MEL expiry 30 December 2026 (can be extended). - Transfer application for MEL 2020-32 in connection with Greenland Mines Ltd.'s acquisition of Neo North Star Resources Inc. submitted to the Government of Greenland on 29 May 2026; approval was pending as of the effective date of this Technical Report Summary and is expected shortly thereafter.
Assets listed	Rare earth elements, niobium, tantalum, cadmium
Governing law	Greenland Mineral Resources Act (Act No. 7 of 7 December 2009, as amended)
Protected area	Excludes (not part of the 191.29km ²) the Amangarnup Qoorua protected area (≈96 km ²), which covers part of the complex including the carbonatite core

Source: Mineral License and Safety Authority Greenland, Online Applications Portal (accessed 2026/07/23)

Table 3-1. Mineral tenure summary. Source: GEUS tenure record and the 2025 Technical Report (Item 4). Full beacon coordinates are held in the title record.

The details MEL 2020-32 were confirmed by reference to the Government of Greenland, Mineral License and Safety Authority, Greenland and the Geological Survey of Denmark and Greenland (GEUS) online database and websites that indicate the Exploration Licence is in good standing.

Mineral Exploration License 2020-32 Coordinates			
Beacon	Long/Lat	Beacon	Long/Lat
A1	N 66, 34, 0 W 51, 19, 0	B1	N 66, 34, 0 W 51, 19, 0
A2	N 66, 34, 0 W 51, 9, 0	B2	N 66, 36, 0 W 51, 19, 0
A3	N 66, 33, 0 W 51, 9, 0	B3	N 66, 36, 0 W 51, 22, 0
A4	N 66, 33, 0 W 51, 7, 0	B4	N 66, 40, 0 W 51, 22, 0
A5	N 66, 32, 0 W 51, 7, 0	B5	N 66, 40, 0 W 51, 24, 0
A6	N 66, 30, 0 W 51, 7, 0	B6	N 66, 41, 30 W 51, 24, 0
A7	N 66, 30, 0 W 51, 8, 0	B7	N 66, 41, 30 W 51, 34, 0
A8	N 66, 29, 0 W 51, 8, 0	B8	N 66, 42, 45 W 51, 34, 0
A9	N 66, 29, 0 W 51, 9, 0	B9	N 66, 42, 45 W 51, 24, 0
A10	N 66, 28, 0 W 51, 9, 0	B10	N 66, 42, 0 W 51, 24, 0
A11	N 66, 28, 0 W 51, 11, 0	B11	N 66, 42, 0 W 51, 18, 0
A12	N 66, 26, 0 W 51, 11, 0	B12	N 66, 38, 30 W 51, 18, 0
A13	N 66, 26, 0 W 51, 20, 0	B13	N 66, 38, 30 W 51, 15, 0
A14	N 66, 27, 0 W 51, 20, 0	B14	N 66, 37, 0 W 51, 15, 0
A15	N 66, 32, 0 W 51, 7, 0	B15	N 66, 37, 0 W 51, 9, 0
A16	N 66, 31, 0 W 51, 22, 0	B16	N 66, 34, 0 W 51, 9, 0
A17	N 66, 33, 0 W 51, 22, 0		
A18	N 66, 33, 0 W 51, 19, 0		

Note: A1 to A18 is the Southern Part of the MEL that was Granted 1st of March 2020, B1 to B16 is the Northern Expansion of the MEL 2020-32 that was Granted 13th of June, 2024.

Source: Mineral License and Safety Authority Greenland, Online Applications Portal (accessed 2026/07/23)

Figure 3-2. Coordinates and boundary of exploration Licence MEL 2020-32.

3.3 Ownership, acquisition and transfer status

On 20 May 2026, Greenland Mines Ltd (GRML; Nasdaq: GRML), the issuer, signed a definitive agreement to acquire 75% of NNSR — and through it the Qaatsuitsup Ulloriaa branch and Licence MEL 2020-32 — from NNSR's stockholders, including Neo Performance Materials (TSX: NEO), for total consideration of US\$35 million (US\$20 million cash and US\$15 million in GRML shares). Neo had itself acquired the project from Hudson Resources in 2023 for US\$3.5 million, and on completion becomes a strategic shareholder in GRML. The indirect transfer of the mineral rights Licence remains subject to approval by the Government of Greenland under Section 69 of the Greenland Mineral Activities Act and other applicable conditions.

Title — material status

As at the effective date the acquisition has not closed. The transfer process has been initiated, but closing remains subject to customary conditions, including approval by the Government of Greenland under Section 69 of the Greenland Mineral Activities Act for the indirect transfer (change of control) of the mineral rights. Until that approval and closing, title remains with NNSR and the registrant's interest in the property is contractual and conditional.

Transfer Date	Transfer Description
09-05-2023	License transferred from Hudson Resources Inc. to Qaatsuitsup Ulloriaa- Transfer date -03 May 2023

Table 3-2. Licence transfer history.

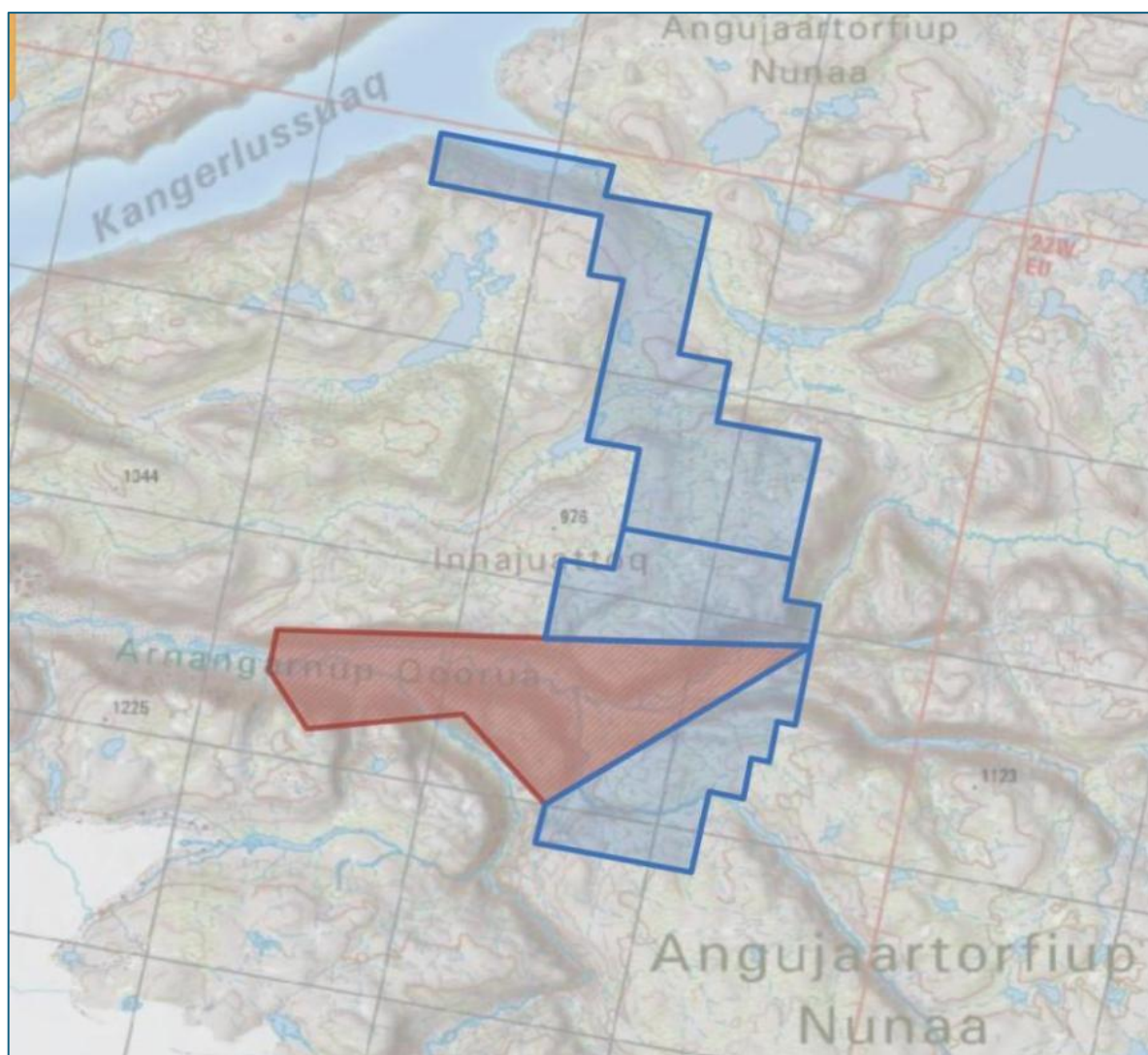


Figure 3-3. Exploration Licence MEL 2020-32 in relation to the Arnangarnup Qoorua protected area.

3.4 Royalties, taxation and encumbrances

Mineral activities in Greenland are subject to the fiscal regime summarized below. The opinion of BDO Nuuk (Claus Bech) with NunaLaw dated 19 August 2026, supplied by the registrant, confirms that the annual royalty and corporate-tax charges operate through a Payable Royalty mechanism under which annual government take is the greater of 5% of the value of minerals sold and the year's corporate income tax, with the royalty floored at nil and no carry in either direction. The economic model is to implement the closed-form annual charge as MAX (5% x

value of minerals sold, 25% x taxable income before any royalty deduction), with tax-loss carry-forward reflected in the income term. The 15% surplus royalty attaches to gemstone extraction only and remains inapplicable to the rare-earth product; the opinion confirms expressly that the surplus royalty applies only to licenses carrying permission to extract gemstones.

The opinion further confirms that, for a flotation concentrate sold to an independent buyer, the value of Minerals sold and considered sold is the invoice sales value of the concentrate as sold and not a notional value of the contained rare-earth oxides (sections 1.01(h) and (j), 2.04–2.12, cf. 2.13 and 2.09), and that MEL 2020-32 and its related addenda incorporate the Standard Terms and Addendum No. 3 of 1 July 2014 with its Appendix 2 (rare earth elements), those royalty terms carrying to the exploitation Licence granted on transition.

Fiscal element	Rate / basis	Note
Corporate income tax	25% if paid on account	On net income after deductions. Advice indicates that on-account payment preserves the 25% rate; otherwise, an effective 26.5% rate applies from 20 November, together with 6% interest. The model assumes timely on-account payment.
Sales royalty — rare earth elements	5% benchmark within Payable Royalty mechanism	Annual combined government take is modelled as the greater of the 5% value-of-minerals-sold benchmark and corporate income tax. Royalty is floored at nil, with no carry in either direction.
Surplus royalty	15% of gross profit exceeding 40%	Attaches to gemstone extraction only. NOT applicable to a rare-earth product and NOT modelled in Item 19. See the note below.
Sales royalty — gemstones	5.5%	Not applicable to the REE product.
Sales royalty — other minerals	2.5%	Not applicable to the REE product.
Dividend tax (resource sector)	36%	Dividends are deductible; a shareholder-level charge. Not modelled, the analysis being unlevered and pre-distribution.
Depreciation — plant & equipment	30% diminishing balance (maximum)	Applies to plant, equipment and intangibles. The rate is elective up to the maximum; the model must compare maximum-rate and slower early-election schedules and disclose

Fiscal element	Rate / basis	Note
		the adopted basis. The additional or accelerated depreciation of up to 50% of taxable income formerly available is confirmed in the 19 August 2026 opinion to be no longer an option and is not applied.
Depreciation — buildings / ships	Buildings 5% SL; vessels 10% SL (maximum)	Elective up to the stated maximum rates; asset-class allocation and election basis must be documented in the locked model.
Tax-loss carry-forward	Unlimited, subject to permit condition	A change of main activity, or a change of more than one-third of the ultimate shareholders, requires a permit to preserve accumulated tax losses. The 19 August 2026 opinion confirms a pre-approval route, assessed by the Tax Agency on commercial-terms grounds, applied for and granted without regard to the Mineral Resources Act section 69 change-of-control approval. The registrant is preparing an application for pre-approval of tax-loss preservation. This pre-approval process is separate from the approval process for the indirect Licence transfer under Section 69 of the Greenland Mineral Activities Act. No pre-approval has been granted as at the report date. . The permit remains outstanding and the assumption is flagged accordingly.

Table 3-3. Greenland fiscal regime applicable to the Project and its treatment in the economic analysis.

Material Fiscal Update - Rare-earth royalty and tax offset.

The 15% surplus royalty continues to be excluded because it applies to gemstone extraction, not the Sarfartoq rare-earth concentrate. The opinion of 19 August 2026 confirms that, for rare earths, annual government take is determined through the Payable Royalty mechanism described above rather than by simply adding the 5% benchmark royalty and corporate income tax.

For CFR/CIF sales, freight to the named port is deducted from the sales price in calculating the value of minerals sold; terminal charges and customs are stated to be borne by the buyer. Reclamation expenditure is deductible when paid into the government escrow.

Exploration expenditure is immediately deductible, so qualifying future exploration work, including proposed 2027 drilling, is deductible as incurred. The 19 August 2026 opinion confirms that the Licence document and its related addenda refer to the Standard Terms and Addendum No. 3 of 1 July 2014 with its appendices, and that those royalty terms carry to the exploitation Licence granted on transition. One residual matter is retained: the terms of an exploitation Licence are settled at grant, and the opinion does not address any basis on which the Mineral Resources Authority might impose different terms at that point. The opinion also advises that processing outside Greenland is contemplated only following negotiation and agreement with the Government on changed Licence conditions, most likely on the basis that the processing is an add-on cost and the material remains under the licensee's control, in which case the royalty point is postponed until sale to an independent third party.

The principal commercial agreement affecting the property is an offtake arrangement: under a memorandum of understanding between Neo and NNSR, Neo holds the right to negotiate a definitive offtake agreement for up to 60% of the concentrate produced; this is reflected in the marketing and payability assumptions (Item 16) and is unaffected by the GRML acquisition. No other royalties, back-in rights, production streams or material encumbrances are known to the QP; this should be confirmed against the title record. There is no privately owned land in Greenland.

3.5 Regulatory framework and path to exploitation

Mineral activities are governed by the Mineral Resources Act (Act No. 7 of 7 December 2009, in force 1 January 2010, as amended). All minerals belong to the Government of Greenland (Naalakkersuisut), which grants licenses; there is no private land, and there is no ownership of surface rights. The Mineral Licence and Safety Authority (MLSA) administers licensing and safety, and the Environmental Agency for Mineral Resource Activities (EAMRA) administers environmental matters. Exploration is conducted under the Standard Terms for Exploration Licenses for Minerals (Excluding Hydrocarbons).

The right to mine requires an exploitation Licence, typically granted for 30 years, containing terms for royalty, the exploitation and closure plans, reporting, and an Impact Benefit Agreement between the company, the municipality and the Government. The path requires an Environmental Impact Assessment (EIA) and a Social Impact Assessment (SIA), each preceded by baseline studies (commonly two to three years) and public consultation: Terms of Reference are published for public hearing; a draft EIA/SIA is published for consultation; the licensee addresses comments in a White Paper; and, following approval, a Mine Plan, Closure Plan and financial security are required before mining may commence. Recent exploitation-Licence grants (Greenland Resources molybdenum, June 2025; Amaroq/Greenland Graphite, December 2025) indicate a functioning current permitting process.

3.6 *Uranium Act and radioactive-element considerations*

Greenland's Uranium Act (Inatsisartut Act No. 20 of 1 December 2021) prohibits the exploitation of uranium and of any mineral resource containing more than 100 ppm uranium and authorizes the Government to introduce similar restrictions on other radioactive elements. The available Sarfartoq composite head assays indicate uranium of the order of 5 ppm — well below the 100-ppm threshold — which is favorable for permitting. Thorium is, however, present as naturally occurring radioactive material (NORM; Items 6, 10 and 17), and the Government retains standing authority to extend radioactive-element restrictions, which the QP notes as a residual regulatory consideration. The sub-threshold uranium status should be confirmed across the Mineral Resource, not only the test composites.

3.7 *Permits, environmental status and surface rights*

The project is at the exploration-Licence stage. Under the Standard Terms, geological and geochemical work, handheld-equipment sampling (within specified weight limits) and non-explosive geophysical surveys may be carried out without specific approval, whereas core drilling, use of explosives or radioactive sources, use of vehicles and any terrain works require pre-approval from the authorities. The Arnangarnup Qoorua protected area ($\approx 96 \text{ km}^2$), which covers part of the complex including the carbonatite core, carries additional access restrictions (for example minimum aircraft altitudes and prohibitions on ground traffic, fires and collection of vegetation or antiquities), and the carbonatite core is presently not accessible for field work. An exploitation Licence has not been applied for; environmental baseline work is ongoing, with a further year of baseline studies intended ahead of submission. No material environmental liabilities from prior activity are known to the QP; this should be confirmed against the Licence record. Environmental, social and permitting matters are addressed in Item 17.

3.8 *Qualified Person's comment and items to be completed*

Qualified Person's Opinion

The QP draws attention to three matters that are material to this assessment.

First, the property is held under an exploration Licence only; the right to mine requires a separate exploitation Licence that has not yet been applied for, so the economic analysis (Item 19) is an Initial Assessment ahead of mining title.

Second, the registrant's acquisition of the Licence-holding entity (NNSR) has not closed and is conditional on Government of Greenland approval under Section 69 of the Greenland Mineral Activities Act; until then the registrant's interest is contractual and conditional.

Third, The BDO Nuuk/NunaLaw opinion dated 19 August 2026 confirms that MEL 2020-32 and its addenda incorporate the Standard Terms for Exploration Licences and Addendum No. 3, including Appendix 2, and that the relevant royalty, tax-offset and depreciation framework is intended to carry forward to an exploitation licence. The terms applicable to any exploitation licence remain subject to the applicable statutory and licensing process and any conditions imposed at grant. The financial model applies the fiscal framework confirmed in the 19 August 2026 opinion, subject to the qualifications and outstanding confirmations described in Items 19.5 and 25. The economic analysis applies

the regime in force at the effective date, under which a licensee exploiting rare earth elements bears a 5% sales royalty and no surplus royalty, the 15% surplus royalty on gross profit exceeding 40% being imposed on gemstone extraction only (Item 3.4).

In addition, the Licence area has been adopted as 191.29 km² consistent with the 2026 Mineral Resource Estimate and has been confirmed from the title documents. None of these matters is unusual for a project at this stage, but each should be disclosed prominently and monitored through to closing, licensing and the next economic update.

3.9 *References*

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective 4 April 2025), Item 4 (Property Description and Location).

Government of Greenland — Mineral Resources Act (Act No. 7 of 7 December 2009, as amended); Uranium Act (Inatsisartut Act No. 20 of 1 December 2021); Standard Terms for Exploration Licenses for Minerals; Mineral Licence and Safety Authority (govmin.gl).

GEUS Mineral Resources Portal — tenure record for MEL 2020-32; Greenland Mines Ltd and Neo Performance Materials — public disclosures, May–June 2026.

ITEM 4 — ACCESSIBILITY, CLIMATE, LOCAL RESOURCES, INFRASTRUCTURE AND PHYSIOGRAPHY

Accessibility, Climate, Local Resources, Infrastructure and Physiography Summary

- Location: The Project is approximately 60 km southwest of Kangerlussuaq, 140 km northeast of Maniitsoq and 110 km southeast of Sisimiut. Access is by air and fjord; Kangerlussuaq has an international airport.
- A continental subarctic / tundra setting with continuous permafrost and a seasonal field window.
- An exploration camp and drill fleet are established, with deep-fjord tidewater access.

The Sarfartoq Nd–Pr Rare Earth Element Project is located within the Sarfartoq Carbonatite Complex of southwest Greenland. The Project is approximately 60 km southwest of Kangerlussuaq, 140 km northeast of Maniitsoq and 110 km southeast of Sisimiut.

The Project benefits from several significant logistical advantages, including proximity to Kangerlussuaq international airport, access to deep-water fjord shipping routes, an established exploration camp, and existing diamond drilling equipment. Regional support services, fuel, accommodation and skilled personnel are available from Kangerlussuaq and Sisimiut, providing a sound foundation for future project development.

At the current stage of evaluation, key infrastructure decisions—including site access, power supply, water sources, concentrate export facilities, processing plant location and tailings storage—remain to be finalized as part of the ongoing engineering and environmental studies. In the Qualified Person's opinion, these represent normal development activities for a project at the Initial Assessment stage and do not constitute material impediments to future development, although they will be important considerations in future engineering, permitting and economic evaluations.

4.1 Physiography

The project occupies ice-scoured Precambrian gneiss terrain within and around the Sarfartoq Carbonatite Complex, in a zone of continuous permafrost. The terrain is rugged, with elevation ranging from about 1,200 m at the Garnet Lake site to sea level at the Sarfartoq Valley and Søndre Strømfjord; the project's base of operations, Neo Camp, sits at about 730 m elevation with ready access northward to the fjord. The Licence area is characterized by steeply incised streams and broad glacial valleys, with numerous intermittent streams; the ground over the carbonatite core is less rugged and somewhat more vegetated, reflecting the phosphate content of the carbonatite. Vegetation is subarctic — grasses and ground shrubs (Labrador tea, dwarf

willow and birch) with flowering plants over till-covered areas — and the region is too cold for trees.

Wildlife is plentiful and includes caribou (reindeer), muskox, arctic hare, arctic fox, ptarmigan and other land and sea birds, with the greatest concentrations occurring in the Sarfartoq Valley outside the exploration-Licence boundary — a consideration for the environmental baseline (Item 17). No significant seismic activity is recorded in the region, which is favorable for infrastructure and tailings design (Items 15 and 17).

4.2 Climate and operating season

The climate is strongly continental subarctic, and Kangerlussuaq — the nearest settlement and the regional reference station — is one of the driest inhabited parts of Greenland. Temperatures range from about -35°C to $+20^{\circ}\text{C}$, with a mean annual temperature of approximately -5.4°C ; winters are long and cold (February mean ≈ -17 to -20°C , with cold spells below -35°C most years) and summers short but relatively mild, with July daytime maxima of about 14 – 16°C . Precipitation is sparse (of the order of 170–290 mm per year), and the area is generally snow- and ice-free from June to September.

Parameter (Kangerlussuaq reference)	Value
Climate type	Continental subarctic / tundra (polar continental)
Temperature range	$\approx -35^{\circ}\text{C}$ to $+20^{\circ}\text{C}$; mean annual $\approx -5.4^{\circ}\text{C}$
Warmest month (July) mean / max	$\approx 10^{\circ}\text{C}$ / 14 – 16°C
Coldest month (February) mean	≈ -17 to -20°C (record low -47.2°C , 1983)
Annual precipitation	≈ 170 – 290 mm (desert level); snow/ice-free June–September
Permafrost	Continuous
Seismicity	No significant recorded seismic activity
Practical field season	Prospecting/mapping $\approx$ May–Sept; drilling/geophysics $\approx$ Mar–Oct; radiometrics $\approx$ Jul–mid-Sept

Table 4-1. Climate and operating-season summary (Kangerlussuaq reference). Sources: 2025 Technical Report (Item 5); regional climate normals.

Field activity windows differ by task: prospecting, mapping and heavy-mineral sampling are limited to the snow-free summer (about May to September); drilling and geophysics can be conducted over a longer season (about March to October), limited mainly by low temperatures and light levels; and radiometric surveys require fully snow- and ice-free ground (about July

to mid-September). Continuous permafrost and the winter season are foundation, tailings and water-management design considerations (Items 15 and 17); a year-round operation is feasible with appropriately winterized, heated facilities.

4.3 *Accessibility*

The regional logistics hub is Kangerlussuaq, approximately 60 km to the north-east of the Project, which has a long, all-weather runway built as the United States Søndrestrom air base and is the principal aviation gateway to central West Greenland.

The property is accessible year-round by helicopter from Kangerlussuaq, which is the preferred means for field work given the absence of roads, the seasonality of the waterways and restrictions on driving in the terrain. During the open water season the property can also be reached by boat from the Søndre Strømfjord (small boats can be rented in Kangerlussuaq, while larger craft and crew are chartered from a larger community such as Nuuk); the fjord is typically ice-free between about March and November and navigable for boating from June to September. In winter, when the terrain and fjord are snow- and ice-covered, the Licence is accessible by snowmobile; driving in the terrain requires a permit. There is no road network connecting the communities, although a road of about 170 km between Kangerlussuaq and Sisimiut has been discussed. The coastal town of Sisimiut, a port and the home of Greenland's mining school, lies about 130 km to the north-west, and Kangerlussuaq lies near the head of the Søndre Strømfjord, which provides deep-water sealift access from the coast.

4.4 *Local resources and personnel*

Kangerlussuaq provides airport, fuel, accommodation and logistics services and is the natural staging point for the project; diesel, Jet-A1 and gasoline are available there, while propane is typically shipped from Nuuk. Sisimiut, the second-largest town in Greenland and the seat of the Arctic mining school, is a source of trained mining and trades personnel and of port services. The operation is expected to be supported on a fly-in / fly-out basis through Kangerlussuaq, with local hiring and training obligations addressed through the Impact Benefit Agreement under any exploitation Licence (Items 3 and 17).

4.5 *Infrastructure*

There is no electricity grid serving the project; power in the field is generated locally, with diesel generators supplemented by small gasoline generators and solar panels, helicopter transport on Jet-A1 fuel, and propane for heating and cooking. A hybrid renewable (wind / hydro-diesel) power configuration, taking advantage of the region's hydropower resources, is identified as a study opportunity that could reduce operating cost and emissions (Items 15, 18 and 21). Process and potable water are expected to be readily available from local lakes, rivers and glacial meltwater, subject to seasonal flow and freezing. The project already holds material field infrastructure — an established camp for approximately 25–30 personnel and two diamond drill rigs in good condition with field-support facilities, which GRML intends to re-open in 2026. Concentrate export would route through a marine facility, either by sealift from the head of the Søndre Strømfjord near Kangerlussuaq or via a coastal port such as Sisimiut.

4.6 *Sufficiency of surface rights and infrastructure*

There is no privately owned land in Greenland; all land is administered by the Government of Greenland, and the exclusive exploration Licence covers the project area (Item 3). Surface rights for mining, plant, tailings and infrastructure would be conferred through an exploitation Licence and the associated approvals.

In the QP's opinion, sufficient land of suitable character is available within and around the Licence for the mine, processing plant, tailings storage and supporting infrastructure, and regional access via Kangerlussuaq airport and the fjord/port system is adequate for a project of this scale. The required on-site infrastructure (power, water, tailings, plant, port and access) does not yet exist and must be designed, permitted and constructed; its sufficiency can be confirmed only once the project studies and site selections are complete.

4.7 *Qualified Person's comment and items to be completed*

Qualified Person's Opinion

The setting is remote and logistically demanding but benefits from three real advantages: an established on-site camp and drill fleet; proximity to Kangerlussuaq major all-weather runway with year-round helicopter access; and deep-water fjord sealift access. The low seismicity is favorable for design, while continuous permafrost and the constrained winter season are normal Arctic design and scheduling considerations.

The principal accessibility and infrastructure uncertainties are the site-access route, the power and water design basis (including the hybrid-renewable option), the concentrate-export port and shipping season, and the plant / tailings / waste site selections — none of which is yet defined. The QP considers these to be normal open items for an Initial Assessment rather than fatal constraints, but they are material to the capital and operating cost estimates (Items 15 and 18) and to the environmental and permitting work (Item 17) and should be advanced before the next study stage.

4.8 *References*

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective 4 April 2025), Item 5 (Accessibility, Climate, Infrastructure and Physiography).

Regional climate normals for Kangerlussuaq (temperature and precipitation) — Climates to Travel; Visit Greenland; Weather2Travel; Climate-Data.org.

Greenland Mines Ltd and Neo Performance Materials — public disclosures, May–June 2026 (site visit; Neo Camp for ≈25–30 personnel; two diamond drill rigs; access and logistics).

ITEM 5 — HISTORY

History Summary

- Discovered by the Geological Survey of Greenland in 1975–76 and explored by successive operators.
- Ownership passed from Hudson Resources to Neo (through NNSR) and is being acquired by GRML.
- Prior estimates and a 2011 PEA exist and are superseded by this assessment; there is no production history.

The Sarfartoq Rare Earth Element Project has been the subject of exploration for more than five decades following its discovery during regional airborne radiometric surveys undertaken by the Geological Survey of Greenland in the mid-1970s. Successive exploration programmes have progressively advanced understanding of the carbonatite complex through geological mapping, geophysical surveys, geochemical sampling, diamond drilling, metallurgical testing and environmental baseline studies.

Ownership of the Project has evolved through several companies, most recently transferring from Hudson Resources to Neo Performance Materials in 2023, with Greenland Mines Ltd currently seeking to acquire the Licence-holding entity, subject to Government of Greenland approval. Extensive drilling and technical investigations have defined the ST1 Zone as the principal rare earth target, with recent drilling significantly enhancing the available geological database.

Although previous Mineral Resource Estimates and a Preliminary Economic Assessment have been completed, these historic studies have been superseded by the current Technical Report Summary — Initial Assessment and are not relied upon for the present Mineral Resource Estimate. The Project remains an exploration-stage asset with no history of mining or commercial production.

5.1 Discovery and early exploration

The Sarfartoq Carbonatite Complex was discovered in 1976 by geologists of the Geological Survey of Greenland (GGU, now GEUS) following a regional airborne radiometric survey and was mapped and characterized petrologically by Secher and Larsen between 1976 and 1981. The wider district had already attracted generative diamond exploration by subsidiaries of De Beers and Rio Tinto in the early 1970s and further sustained diamond campaigns through the 1990s and 2000s. Exploration of the complex itself has since passed through phases directed successively at phosphate, niobium–tantalum and, most recently, rare earths.

5.2 Ownership and Licence history



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

The property has passed through several operators, summarized in Table 5-1. Niobium exploration at the Sarfartoq No. 1 pyrochlore occurrence was carried out by Hecla Mining (1989), Texas Energy Corporation and Foundation Resources (1996–1997) and New Millennium Resources (NMR, 1998–2002). Hudson Resources Inc. entered a diamond joint venture with NMR in 2003 and acquired 75% of all metals and diamonds on the Licence in 2006, then conducted the rare-earth work of 2009–2012. In 2023 the exploration Licence (MEL 2020-32) was transferred to Neo North Star Resources, Inc. (NNSR, operating in Greenland as Qaat-suitsup Ulloriaa, a Neo Performance Materials entity), and the Licence area was subsequently expanded to approximately 191 km². On 20 May 2026 Greenland Mines Ltd (GRML) signed a definitive agreement to acquire 75% of NNSR for total consideration of US\$35 million, with closing conditional on Government of Greenland approval under the Mineral Resources Act (Item 3).

Period	Operator(s)	Activity and outcome
Early 1970s	De Beers and Rio Tinto subsidiaries	Generative diamond exploration in the Sarfartoq region.
1976	GGU (now GEUS)	Discovery of the Sarfartoq Carbonatite Complex by K. Secher following a regional airborne radiometric survey; regional mapping and petrology 1976–1981 (Secher and Larsen).
1980s	Various	Niobium–tantalum exploration on the carbonatite core.
1989	Hecla Mining Company	13 holes / 567.5 m at the Sarfartoq No. 1 niobium (pyrochlore) occurrence; historic (non-compliant) Nb estimate; Licence surrendered end-1989.
1996–1997	Texas Energy Corp. / Foundation Resources	Licence EL25/96; geological and metallurgical work at Sarfartoq No. 1.
1998–2002	New Millennium Resources (NMR)	15 NQ holes / 707 m at Sarfartoq No. 1; regional radiometric anomaly ranking; 2000 heli-magnetic/radiometric survey; historic JORC / non-compliant Nb estimates (2001 Snowden audit).
1990s–2000s	Diamond explorers / Hudson	Sustained diamond exploration across the district (e.g. Garnet Lake).

Period	Operator(s)	Activity and outcome
2003 / 2006	Hudson Resources Inc.	Diamond joint venture with NMR (2003); Hudson acquires 75% of all metals and diamonds on the Licence (2006).
2009–2012	Hudson Resources Inc.	Rare-earth campaign at ST1 — drilling (116 holes / 25,343 m to 2011), geophysics (~273 km), petrography, bench metallurgy and a 7-t bulk sample; January 2011 inferred resource; November 2011 PEA; 2012 updated (underground) resource. Care and maintenance after 2012.
2023	Neo North Star Resources (NNSR) / Qaatsuitsup Ulloriaa	Licence (MEL 2020-32) transferred from Hudson; ST1 infill drilling, mapping, soil and geophysical surveys, renewed SGS metallurgy, and environmental/community baseline; Licence area expanded to ≈191 km ² .
2025	NNSR	Internal (non-NI 43-101-compliant) technical update; project re-focused on neodymium–praseodymium; updated ST1 resource.
2026	Greenland Mines Ltd (GRML)	On 20 May 2026 GRML signs a definitive agreement to acquire 75% of NNSR for US\$35 million, subject to Government of Greenland approval (Item 3).

Table 5-1. Ownership and exploration chronology. Source: 2025 Technical Report (Item 6) and GRML/Neo public disclosures.

5.3 Exploration and drilling history

Exploration relevant to the ST1 rare-earth deposit comprises airborne and ground geophysics, geological mapping, surface geochemistry and diamond drilling (Item 7). Hudson completed the bulk of the drilling between 2009 and 2012, and NNSR added a 2023 infill programme at ST1. As reported in the 2025 Technical Report, the full project database now comprises 161 drill holes for 35,843 m, of which 94 holes (23,094 m) inform the ST1 Mineral Resource estimate (Item 7). The 2023 NNSR data are unpublished and require independent validation before they can support a public Mineral Resource (Items 7 and 9).

5.4 Historical niobium estimates

The Sarfartoq No. 1 pyrochlore occurrence — a separate, standalone niobium system near the core of the complex, distinct from the ST1 rare-earth deposit — was the subject of several historical niobium estimates, including Druecker (1989), Maynard (1999, 2001) and an in-house NMR estimate in 2002 (for example a measured estimate of 23,478 t at about 5.95% Nb and an inferred estimate of 64,301 t at about 3.89% Nb, on various historic cut-offs). These historical estimates are not compliant with NI 43-101 or JORC, have not been verified or classified as current Mineral Resources by a Qualified Person, are not treated as current Mineral Resources by the issuer, and should not be relied upon. They are recorded here for completeness only; the niobium by-product potential is discussed in Item 21.

5.5 Previous rare-earth estimates and studies

Three successive technical studies have addressed the ST1 rare-earth zone, summarized in Table 5-2. Each superseded the last and none is relied upon for the current Mineral Resource (Item 11); the earlier NI 43-101 estimates pre-date the current work, and the 2025 estimate is expressly an internal update that its authors state is not compliant with NI 43-101 or S-K 1300 and is for internal use only, pending independent re-statement (Item 9).

Study	Effective date	ST1 resource	Notes
2011 PEA (Wardrop / Tetra Tech, with GeoSim)	25 Nov 2011	ST1 Inferred 14.1 Mt @ 1.51% TREO (0.8% cut-off, open pit)	NI 43-101; 2,000 t/d, 21 yr; capital US\$343 M; IRR 31.2%, NPV ₁₀ US\$616 M (pre-tax) @ US\$32/kg conc.
2012 update (Druecker & Simpson)	26 Apr 2012	ST1 underground: Indicated 5.9 Mt @ 1.8%, Inferred 2.5 Mt @ 1.6% TREO (1.0% cut-off)	NI 43-101; ID ² , 50 holes / 12,705 m; recast to underground scenario.
2025 internal up date (Felsman et al.)	4 Apr 2025	ST1 open pit: Indicated 6.6 Mt @ 1.64%, Inferred 3.6 Mt @ 1.11%; underground: Indicated 7.2 Mt @ 1.68%, Inferred 2.5 Mt @ 1.53% TREO	NOT NI 43-101-compliant (internal use only); ID ² , 94 holes / 23,094 m in estimate; Nd-Pr focus.

Table 5-2. Previous rare-earth estimates and studies at ST1. Source: 2011 Wardrop/Tetra Tech PEA; 2012 Druecker & Simpson report; 2025 Technical Report. Historical and internal estimates are not relied upon for the current assessment.

The 2011 Preliminary Economic Assessment (Wardrop, a Tetra Tech company, with GeoSim, for Hudson Resources Inc.; effective 25 November 2011) evaluated a 2,000 t/d open-pit operation over a 21-year life on an Inferred Resource of 14.1 Mt at 1.51% TREO. The 2012 update (Druecker & Simpson) re-cast ST1 to an underground scenario. The 2025 internal update (Felsman, Simpson, Goode and Druecker for NNSR; effective 4 April 2025) provided an interim technical basis but was for internal use and has been superseded for public-resource purposes by the issued 2026 MRE TRS effective 31 July 2026. Only the issued 2026 MRE reported in Item 11 is used as the Mineral Resource basis of this Initial Assessment.

5.6 Production history

The Sarfartoq deposit has not been mined. There is no production history, and no historical mineral processing or metallurgical production, from the property.

5.7 References

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective 4 April 2025), Item 6 (Property Description and Location — exploration history).

Wardrop (a Tetra Tech company) with GeoSim Services Inc., 2011. Preliminary Economic Assessment on the Sarfartoq Rare Earth Element Project, Greenland (effective 25 November 2011).

Druecker, M. and Simpson, R.G., 2012. Technical Report on the Sarfartoq Project, West Greenland — 2012 Updated Mineral Resource (effective 26 April 2012).

Druecker (1989); Maynard (1999, 2001); New Millennium Resources (2002); Snowden Mining Industry Consultants (2001) — historical, non-compliant niobium estimates for the Sarfartoq No. 1 occurrence.

Greenland Mines Ltd and Neo Performance Materials — public disclosures, May–June 2026 (NNSR acquisition).

ITEM 6 — GEOLOGICAL SETTING, MINERALIZATION AND DEPOSIT

Geological Setting, Mineralisation and Deposit Summary

- A carbonatite complex hosting structurally controlled rare earth mineralisation.
- ST1 carries an unusually high neodymium–praseodymium ratio — the principal value driver.
- Thorium is present as naturally occurring radioactive material; uranium is low.

The Sarfartoq Rare Earth Element Project is hosted within the Neoproterozoic Sarfartoq Carbonatite Complex of southern West Greenland, one of the region's most significant carbonatite-hosted rare earth systems. Rare earth mineralisation is hydrothermal in origin and is principally associated with structurally controlled alteration zones developed along the margins of the carbonatite intrusion, where remobilized rare earth minerals have been concentrated within shear zones, veinlets and altered carbonatite.

The ST1 Zone represents the principal Mineral Resource evaluated in this Technical Report Summary — Initial Assessment and comprises a near-surface rare earth deposit that remains open at depth, supporting the potential for both open pit and underground mining. Mineralisation is dominated by light rare earth elements, with an unusually high proportion of the critical magnet rare earths neodymium and praseodymium, which form the primary basis of the Project's economic value.

Mineralogical studies demonstrate that rare earths occur within a complex assemblage of carbonate, fluorocarbonate and phosphate minerals, principally bastnaesite, monazite, synchysite/parisite and ancylite. Burbankite was not identified in the 2023 mineralogical study; mineralogical descriptions in this report are limited to minerals confirmed in the relevant work programmes. This mineralogical variability is an important consideration in determining metallurgical recovery, concentrate quality and overall project economics.

The Qualified Person considers the regional geological framework and deposit model to be well established and supported by extensive exploration, drilling and mineralogical investigations. The geological characteristics of the ST1 Zone are consistent with a structurally controlled hydrothermal carbonatite rare earth deposit and provide a sound basis for the current Mineral Resource Estimate and the preliminary economic evaluation presented elsewhere in this report.

6.1 Regional geology

The Sarfartoq Nd–Pr project lies within the Sarfartoq Carbonatite Complex (SCC) in the Qeqqata municipality of southern West Greenland. The Project is approximately 60 km south-west of Kangerlussuaq, 140 km northeast of Maniitsoq and 110 km southeast of Sisimiut.

The complex is interpreted to straddle the boundary between the Archaean North Atlantic Craton and the Palaeoproterozoic Nagssugtoqidian mobile belt. The host rocks are granite and granodiorite gneisses cut by the Palaeoproterozoic Kangaamiut diabase dyke swarm, and the complex is localized on a reactivated Precambrian structural zone. Radiometric dating gives an emplacement age of approximately 565 Ma (Secher and Larsen, 1980), placing Sarfartoq within the latest-Neoproterozoic to early Paleozoic North Atlantic carbonatite province; the host gneisses were multiply deformed and metamorphosed during earlier Archaean and Palaeoproterozoic orogenic events.



Figure 6-1. ST1 carbonatite zone exposed on the outcrop face.

6.2 The Sarfartoq Carbonatite Complex

The complex is sub-circular to oval in plan, with a geophysical influence extending up to about 12 km from its center and has a conical structure with a magnetic core of apatite- and magnetite-rich ferrocarnatite. The core is surrounded by narrow, close-lying concentric carbonatite sheets with interleaved screens of fenitized country rock and a partial rim of sodic fenite. The

dominant carbonatite type is ferrocarbonatite — rauhaugite (ankerite-dominant) in the core and beforosite (ferro dolomite-dominant) in the marginal dykes — with calcio carbonatite (sövite) only as subordinate units in the core; the most common alteration is aegirine-bearing fenite. Serpentinite, hornblendite, pyroxenite and kimberlite have also been identified in the magnetic core.

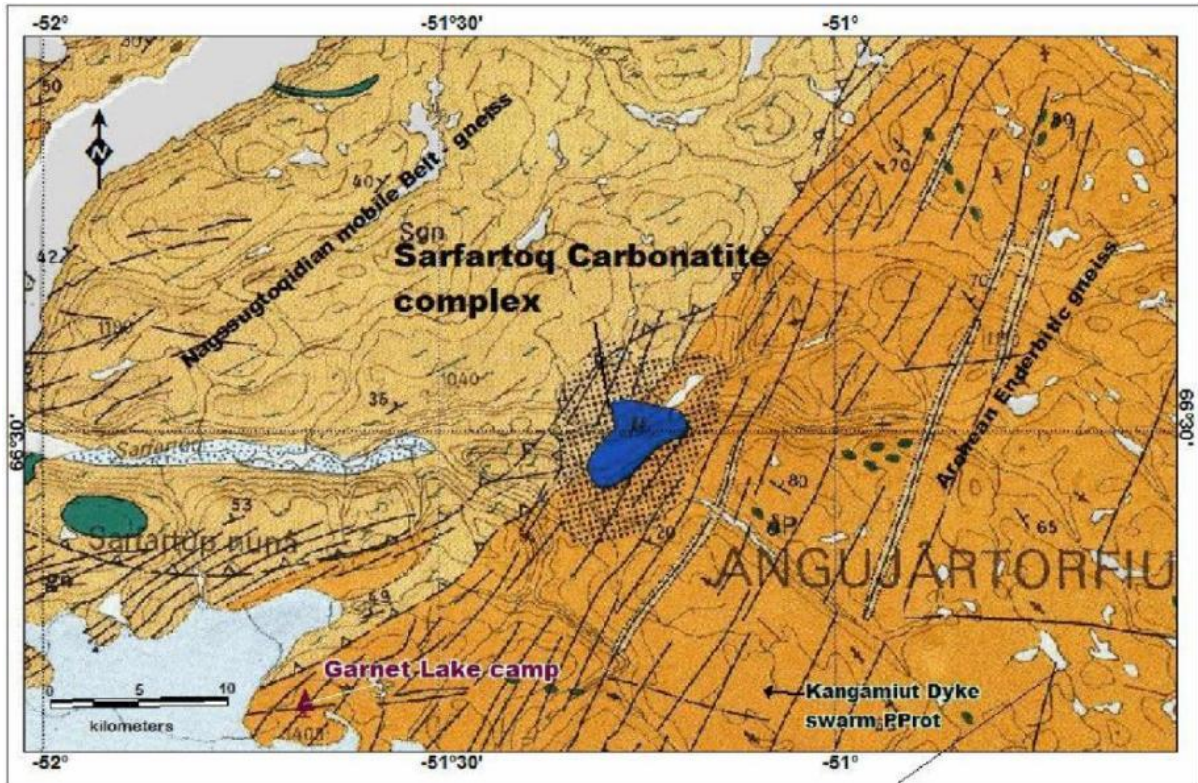


Figure 6-2. Regional setting of the Sarfartoq Carbonatite Complex.

Reinterpretation of the host structures (2025)

Earlier work described the outer ring of the complex as 50–200 m-wide radioactive shear zones of lionized, hepatized and jointed gneiss, expressed as thorium and uranium radiometric anomalies, and prior drafts of this report treated the mineralisation as hosted in hydrothermally altered shear zones. The 2025 Technical Report reinterprets these features: recent evaluation has found no confirmed evidence of shearing, and the zones — which correlate with abundant carbonatite occurrences — are now interpreted as carbonatite dyke swarms forming a ring-dyke structure. The radiometric response reflects thorium enrichment within REE-mineralized carbonatite, not shearing. This section adopts the carbonatite-dyke-swarm interpretation.

6.3 Deposit geology and the ST1 zone

The Sarfartoq rare-earth deposit is developed within the outer ring structure of the complex, of which the ST1 zone is the subject of this assessment. On the 2025 interpretation, ST1 is a large,

subvertical, north-east-striking ferrocarbonatite dyke swarm — locally exceeding 700 m in width — comprising dykes that range from hairline fracture-fillings to drill intercepts exceeding 100 m, in radial and concentric orientations about the central carbonatite mass. This revises the 2011 interpretation of one or two parallel bodies dipping about -55° to the north-west; the direction (north-east strike, north-west dip sense) is consistent across all reports, but the 2025 model treats the body as subvertical and emplaced in a broadly isotropic stress regime rather than shear-controlled.

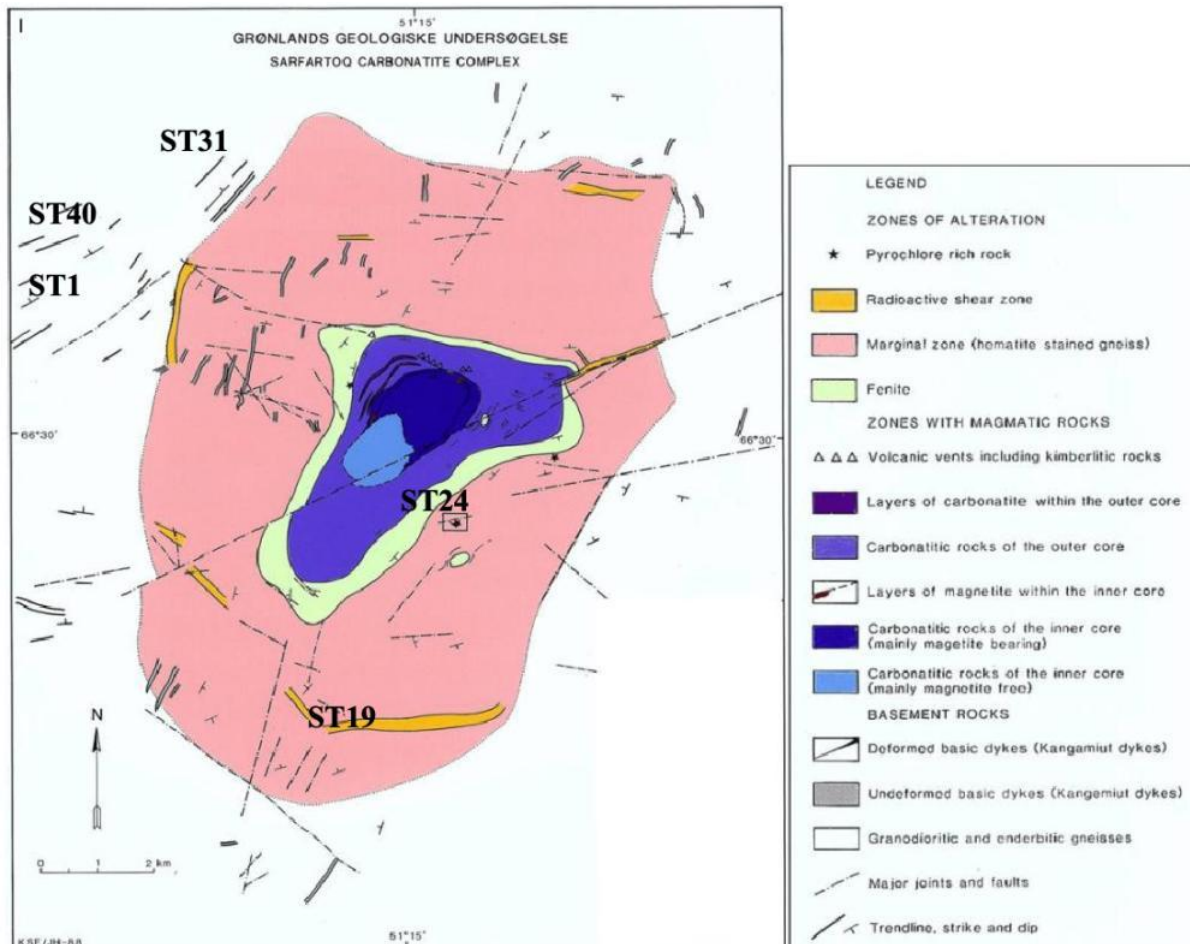


Figure 6-3. Geology of the Sarfartoq Carbonatite Complex (after Secher et al., 1986).

The ST1 Mineral Resource database comprises 94 core holes for 23,094 m, drawn from a property-wide database of 161 holes for 35,843 m (Item 7). Mineralisation extends from surface and remains open at depth and along strike to the north-east — where the highest grades occur (Item 7) — which supports the combined open-pit and underground inventory carried in the economic analysis (Items 13 and 19). In the hybrid scenario adopted in this report the underground stope shapes lie wholly beneath the base of the optimized pit shell, with a 20 m exclusion zone at the interface, so the two components are spatially exclusive and are additive. The ST1 Mineral Resource Estimate (Item 11) is summarized below for geological context. The estimate is that contained in the technical report summary issued by GeoSim Services Inc. and Tetra Tech Canada Inc. on 16 August 2026 with an effective date of 31 July 2026, reported net

of the exclusion zone at the open pit to underground interface. No Mineral Reserve has been estimated.

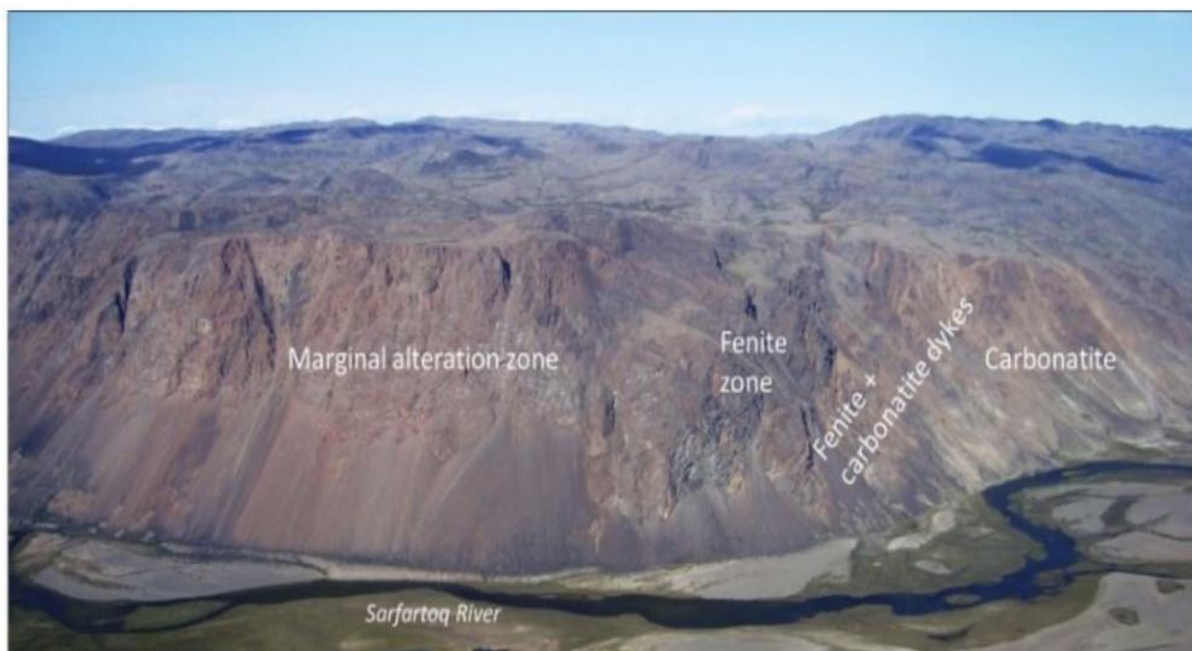


Figure 6-4. Outcropping carbonatite core, fenite and marginal alteration zones north of Paradise Valley; cliffs are approximately 500 m high.

Class	Tonnes (Mt)	TREO %	Component
Indicated	3.979	1.57	Open pit
Inferred	3.329	0.67	Open pit
Indicated	2.918	1.64	Underground, below the pit floor, net of the exclusion zone
Inferred	2.012	1.45	Underground, below the pit floor, net of the exclusion zone
Combined — spatially exclusive and additive	12.24	1.32	OP + UG (hybrid scenario)

Table 6-1. ST1 Hybrid Mineral Resource, shown for geological context. The open-pit and underground components are spatially exclusive and additive. Source: Sarfaratq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026; see Item 11 for the full statement, cut-off basis and assumptions.

Two further zones occur within the same system: ST40, which is barite-rich, more neodymium-enriched than ST1 and relatively richer in heavy rare earths, and ST19, which is lower grade and more lanthanum-rich. ST40 is presently unclassified and is excluded from the production schedule (Item 21).

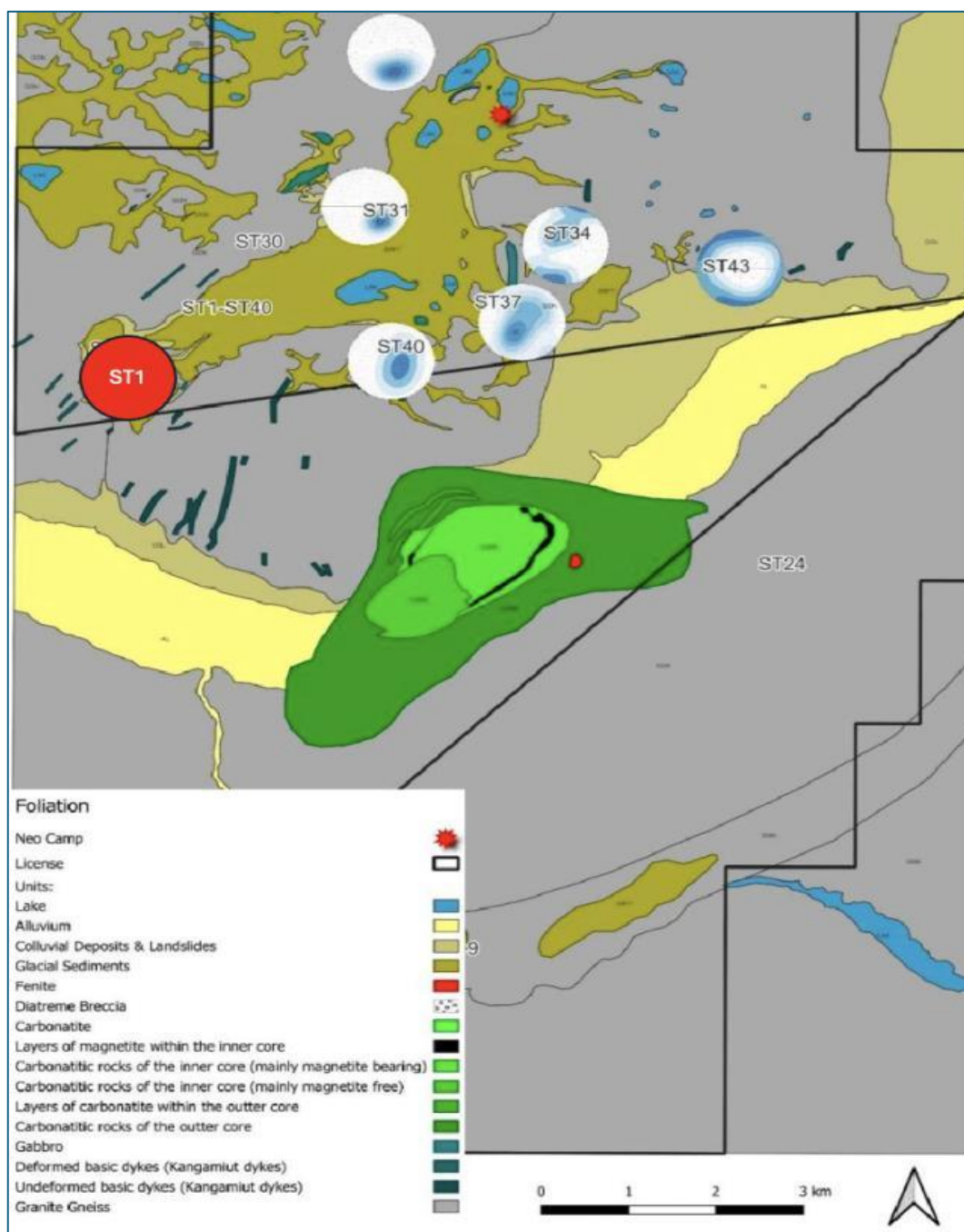


Figure 6-5. Location of mineralized zones; ST1 is the principal target.

6.4 Mineralization and mineralogy

Rare-earth mineralisation is hosted within the ferrocarbonatite dykes, principally in fine-grained, red, earthy hematite-rich masses (enriched in Fe, Ca, Ba, REE and Th) intimately mixed with apatite, barite, strontianite, ferroan dolomite, hematite and pyrochlore; where these masses occur as hexagonal pseudomorphs the primary mineral may have been burbankite. The mineralisation is very fine-grained (grain sizes commonly below 20 μm), which makes the rare-earth mineralogy difficult to characterize and, as the 2025 Technical Report notes, prone to misidentification.

Approximately 60 mineral phases have been identified or tentatively identified across the various studies, of which about 17 may host significant rare earths and three may host significant niobium. The rare-earth minerals considered most important are monazite, bastnäsite, synchysite and ancylite; apatite locally accounts for a significant part of the rare-earth budget, and phases such as zhonghuacerite and unnamed REE oxide-carbonates are abundant in individual samples. Pyrochlore is the principal niobium host. A comprehensive mineralogical study of 110 drill-core samples across the resource and its north-east extension is in progress, with the objective of a three-dimensional model of mineralogical variation.

Earlier automated-mineralogy work on the metallurgical composites reported abundant burbankite, a Ca–Sr–Ba–Na carbonate carrying only about 15% TREO. Burbankite was not identified in the 2023 mineralogical study (Mariano and Mariano, 2023), which found the rare earths to be carried principally by bastnaesite, monazite, synchysite/parisite and ancylite. Mineralogical descriptions in this report are limited to minerals confirmed in the relevant work programmes. The discrepancy between the earlier automated work and the 2023 optical and microanalytical work is unresolved and bears directly on the flotation response; resolution is listed at Item 23.

The deposit is light-rare-earth-dominant but carries a comparatively high magnet-rare-earth tenor. The ST1 TREO distribution is approximately 47% cerium, 24% lanthanum, 19% neodymium and 6% praseodymium, with minor heavy rare earths; the combined neodymium–praseodymium fraction (about 25% of TREO) is high for a carbonatite and underpins the project's Nd–Pr characterization and basket value (Item 16). The rare-earth distribution varies between zones, as summarized below.

Zone	La/Nd ratio	LREO/HREO ratio	Character
ST40	0.38	24	Most Nd-enriched ($\text{Nd}_2\text{O}_3 \approx 42\%$ of TREO); barite-rich; relatively HREO-rich; unclassified
ST1	1.06	40	Resource zone; $\approx 47\%$ Ce, 24% La, 19% Nd, 6% Pr of TREO
ST19	2.31	52	Most La-rich, least Nd-enriched; lower grade

Table 6-2. Inter-zone rare-earth geochemistry. Source: 2025 Technical Report, Item 9. A lower La/Nd ratio indicates greater neodymium enrichment.

Thorium / NORM

Thorium is hosted in the rare-earth and accessory minerals and in the hematite-rich mineralized masses, consistent with the radiometric expression of the mineralized carbonatite; uranium is low. The naturally

occurring radioactive material (NORM) content is a product-specification, handling and permitting consideration, addressed in Items 10 and 17.

6.5 *Deposit type and genetic model*

Sarfartoq is a carbonatite-hosted rare-earth deposit. Carbonatite complexes host most of the world's niobium reserves and a significant share of its rare-earth reserves and production; well-known analogues include Bayan Obo (China) and Mountain Pass (USA), the latter also a ferrocarnatite-hosted, fenite-associated light-rare-earth system. At Sarfartoq the rare earths are concentrated within the ferrocarnatite dyke swarms of the outer ring structure, with the highest grades in fine-grained hematite-rich masses of combined magmatic and hydrothermal origin, rather than in discrete shear zones as previously interpreted (Item 6.2).



Figure 6-6. View toward the exposed ST1 outcrop; slope height is approximately 200 m.

The genetic model has two practical consequences for this assessment. First, mineralisation is emplaced as a subvertical dyke swarm and is mineralogically complex and fine-grained, so grade continuity and metallurgical behavior can vary over short distances — relevant to resource classification (Item 11) and to metallurgical design (Item 10). Second, the strong thorium–rare-earth association makes radiometrics an effective exploration tool but also means the mineralisation and its products carry NORM (Item 17).

6.6 *Niobium–tantalum and phosphate potential*

Niobium occurs as pyrochlore associated with the ring-dyke structures; the principal occurrence is the historic Sarfartoq No. 1 pyrochlore body near the core of the complex (a separate, standalone system), while lower — locally potentially economic — concentrations occur

within the carbonatites, including some of the REE-bearing dykes at ST1 (Item 21). The complex also hosts apatite (phosphate), historically assessed as a phosphate resource. Neither niobium–tantalum nor phosphate is evaluated as a product in this assessment: they are noted only as potential by-product or future-upside considerations, are not included in the ST1 Mineral Resource, and carry no value in the economic analysis.

6.7 Reliance and data adequacy

The regional and complex-scale geology summarized above is well established in the published literature (Item 6.8) and is considered reliable by the QP, subject to the 2025 reinterpretation of host structures adopted in Item 6.2. Deposit-scale geometry, drilling coverage and grade continuity are based on the project database and the issued 2026 MRE TRS described in Item 11. The Initial Assessment author relies on the responsible MRE QPs for the resource estimate and their verification work; the author’s supplementary review limitations are disclosed in Item 9. Deposit mineralogy remains under study and is addressed in Items 10, 22 and 23.

6.8 References

Secher, K. and Larsen, L.M., 1980. Geology and mineralogy of the Sarfartôq carbonatite complex, southern West Greenland. *Lithos*, 13.

Secher, K., 1976, 1986, 1989. Regional geology and phosphate resources of the Sarfartoq Carbonatite Complex, southern West Greenland (GEUS/GGU).

Barnes (New Millennium Resources), 1999–2001; Bedini, 2009 — geophysical and structural interpretation of the outer ring structures.

Mariano, A.N., 2011; Mariano, A.N. and Mariano, A., 2023 — mineralogical investigations of Sarfartoq rare-earth mineralisation (2023).

Keulen, N. and Secher, K., 2014. REE-mineralisation in the Sarfartoq Carbonatite, Greenland (GEUS); Thrane, K. et al., 2014. Rare earth element resources of Greenland (ERES 2014).

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update, Items 7 (Geological Setting), 8 (Deposit Type) and 9 (Mineralization).

SGS Canada Inc. (Lakefield), 2024–2026. Beneficiation test work and head mineralogy, Project 19446-02A; GeoSim Services Inc. — Sarfartoq ST1 Mineral Resource estimate (; Item 11).

ITEM 7 — EXPLORATION

Exploration Summary

- A deep, multi-operator dataset of geophysics, mapping, geochemistry and a property-wide drill database of 161 drill holes totaling 35,843 m, of which 94 holes for 23,094 m inform the ST1 Mineral Resource.
- The 2023 ST1 infill is the most recent and material data but is unpublished and not yet validated.
- Exploration results are reported as supplied and are not yet independently verified by the QP.

The Sarfartoq Rare Earth Element Project has been explored over several decades through a comprehensive programme of geological mapping, surface geochemistry, airborne and ground geophysics, diamond drilling, metallurgical testing and environmental baseline investigations. Exploration has successfully identified several rare earth mineralized zones within the Sarfartoq Carbonatite Complex, with the ST1 Zone representing the most advanced and extensively evaluated target.

The property-wide drill database comprises 161 drill holes totaling 35,843 m. Of these, the ST1 Mineral Resource database comprises 94 drill holes totaling 23,094 m, including 17 ST1 holes totaling approximately 4,229 m drilled in 2023. The balance of the property-wide database lies outside the ST1 Mineral Resource and comprises historic drilling on the satellite occurrences and on the diamond and niobium targets.

The Qualified Person considers the exploration completed to date to be extensive and appropriate for an Initial Assessment and updated Mineral Resource. However, portions of the historical exploration database, particularly the 2023 drilling programme, have not yet been independently validated for public reporting purposes. Completion of this verification process, together with confirmation of historical data quality, represents an important requirement before the exploration results can fully support future public Mineral Resource reporting under SEC S-K 1300.

7.1 Basis and summary

Item 7 of Regulation S-K 1300 (§ 229.601(b)(96)) requires a description of the nature and extent of the exploration work — including geological mapping, geochemical and geophysical surveys, and drilling — the procedures and results of that work, and the Qualified Person's (QP) assessment of its adequacy and reliability. This section describes the exploration of the Sarfartoq Carbonatite Complex, and of the ST1 rare-earth deposit, as documented in Item 10 of the 2025 Technical Report and reviewed by the QP.

Exploration has proceeded over several decades and multiple operators — Hudson Resources Inc. (2009–2012), Neo North Star Resources Inc. (NNSR, 2023–2024) and now Greenland Mines Ltd — and comprises airborne and ground geophysics, geological mapping, rock-chip and soil geochemistry, diamond drilling, a surface bulk sample and metallurgical test work (Item 10). The ST1 zone is the most advanced target and is the sole subject of the Mineral Resource estimate (Item 11); the satellite occurrences (ST19, ST24, ST31, ST40, ST43) and the wider complex are earlier stage. As noted in Items 8 and 9, the 2023–2024 NNSR data are unpublished, and the exploration results are reported as supplied by the operators and remain to be independently validated by the QP.

7.2 Exploration history

Rare-earth exploration began in 2009, when Hudson redirected its diamond programme to test the REE occurrences on the outer ring structure of the complex; a sampling and prospecting programme in mid-2009 was followed by a reconnaissance drill programme in September 2009. Work expanded in 2010 (ground geophysics, trenching, drilling and a new camp) and peaked in 2011, when Hudson completed a 71-hole, 16,292 m drill programme across the targets, collected a 7-tonne ST1 bulk sample, ran ground geophysical grids at ST1, ST19 and ST24, acquired digital elevation models, and initiated an Environmental Impact Assessment and a Preliminary Economic Assessment (effective 25 November 2011). Additional drilling in 2012 was not incorporated into the ST1 resource at the time, and the project then entered care and maintenance until 2023.

Following transfer of the Licence to NNSR, the 2023 programme re-established the field camp (Neo Camp) and comprised infill drilling at ST1, soil geochemistry, ground geophysics, geological mapping and rock-chip sampling, renewed metallurgical test work, and environmental and socio-economic baseline studies. The 2024 programme carried no drilling but expanded geological mapping, rock-chip sampling, ground geophysics and soil geochemistry across the northern part of the complex.

7.3 Geological mapping and rock-chip sampling

Reconnaissance mapping and rock-chip and stream-sediment sampling by Hudson (2009–2012) focused on the known radiometric anomalies (ST1, ST40, ST19, ST24). A more systematic geological mapping programme began in 2024, with 109 rock-chip samples collected; results confirmed significant rare-earth mineralisation across the northern block of the Licence and at ST24. At ST1, ferrocarnatite veins crop out along the eastern slope of a steeply incised gully over approximately 400 m, and surface rock samples returning 1–10% TREO are common. A property-wide sampling and prospecting programme has still to be completed.

7.4 Soil geochemistry

Soil geochemical surveys in 2023 and 2024 sampled 1,114 sites — a 180-sample grid at 100 × 50 m over ST1 in 2023, extended in 2024 to a 100 × 200 m grid across the Licence. The strong-

est rare-earth soil anomaly overlies ST1, where mineralized carbonatite crops out, and mineralized trends from ST1 to ST31 and from ST1 through ST40 to ST43 are marked by soil anomalies, with neodymium in soils mirroring total rare earths. Portable XRF was found adequate to detect the rare-earth response in soils over the ST1 resource but not reliably across the whole property, so laboratory analysis is required for property-wide surveys.

7.5 Geophysics

Geophysics has been central to target definition. The complex was discovered in a 1975–1976 airborne radiometric survey, and a 1999 airborne radiometric and magnetic survey (flown for New Millennium Resources) was pivotal in defining its extent and the principal pyrochlore and rare-earth prospects; earlier magnetic and electromagnetic surveys (1996–2001) and later ground surveys by Hudson (2010–2011) and NNSR (2023–2024, ground gamma radiometrics and gravity) complete the coverage, all accessible through the Greenland Mineral Resources Portal.

The geophysical response is well suited to this deposit style. Thorium substitutes readily into rare-earth minerals, so rare-earth mineralisation appears as radiometric thorium highs; fenitic alteration around the carbonatite forms potassium highs; and because fenitisation is magnetite-destructive, magnetic lows coincident with radiometric highs are prospective for carbonatite, fenite and rare-earth occurrences. At Sarfartoq, surface thorium anomalies mark the carbonatite ring-dyke structures, and coincident magnetic lows indicate that the outer ring structure continues at depth.

7.6 Drilling

Diamond drilling is the principal data source for the ST1 Mineral Resource. The ST1 Mineral Resource database comprises 94 drill holes totaling 23,094 m, of which 17 ST1 holes totaling approximately 4,229 m were drilled by NNSR in 2023. The property-wide drill database comprises 161 drill holes totaling 35,843 m. Core recovery is generally high, with a median above 99.5% and overall recovery above 95%; 75% is the modal value and not the average. The drilling is summarized in Table 7-1.

Year	Holes	Meters	Assay intervals	Meters sampled
2009	4	573.4	216	392.6
2010	15	4,162.9	3,001	3,790.1
2011	44	10,550.9	5,578	11,171.8
2012	14	3,578.2	1,612	3,230.4

Year	Holes	Meters	Assay intervals	Meters sampled
2023 (NNSR infill)	17	4,228.9	1,692	3,455.8
Total	94	23,094.3	12,099	22,040.6

Table 7-1. ST1 drilling summary — the database informing the ST1 Mineral Resource. Source: Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026, Table 11-1. The property-wide drill database of 161 holes for 35,843 m is stated separately at Item 7.1 and is not the database informing the Mineral Resource. Note: the 2023 row is the NNSR infill programme. The meters-sampled entry for 2011 as reported in the source exceeds the meters drilled for that year; the annual totals nonetheless sum correctly to the reported totals. The Qualified Person has identified this as a transcription anomaly in the source table requiring reconciliation against the drill database and has listed that reconciliation at Item 23. It does not affect the totals used in the Mineral Resource estimate.



Figure 7-1. Representative drill core from the ST1 zone.

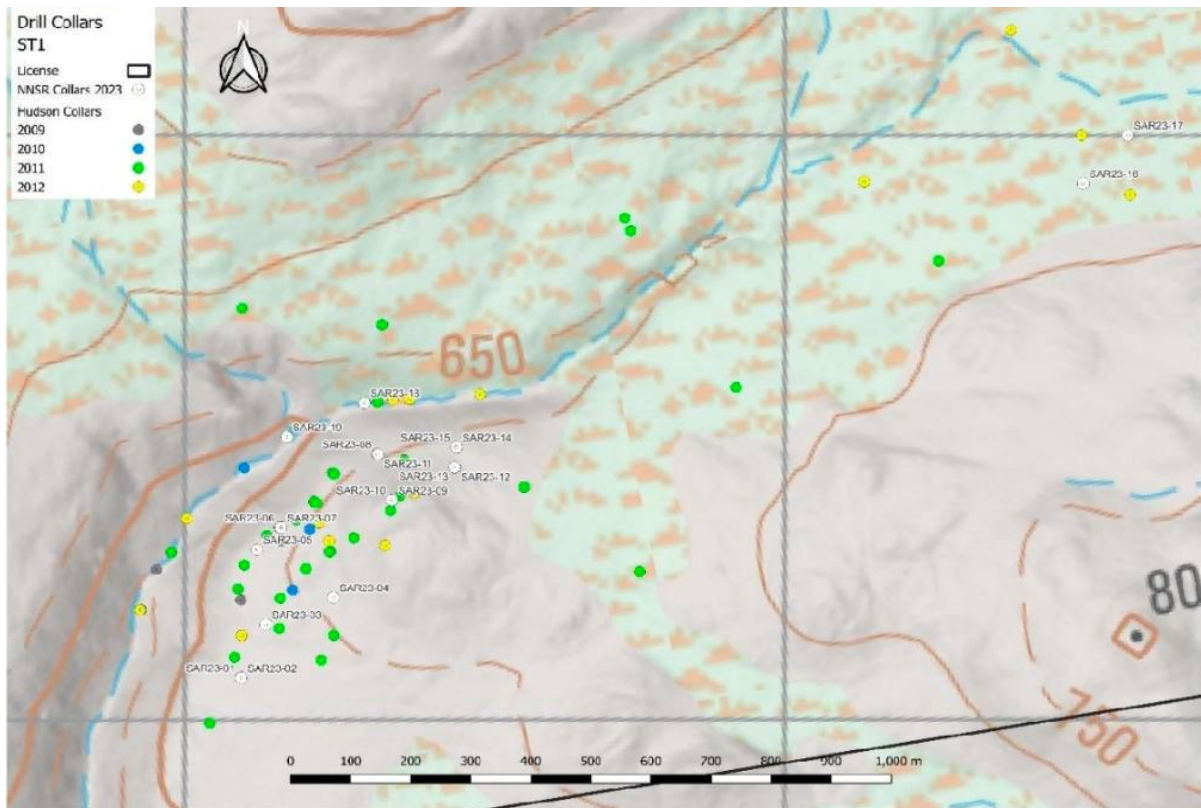


Figure 7-2. Drill-hole locations at the ST1 zone.

7.7 Drilling results and significant intercepts

Rare-earth mineralisation is hosted in coarse-grained ferrocarnatite dyke swarms (ankerite, ferroan dolomite, siderite and barite) within a fenitized granitic-gneiss envelope. All drilled areas are strongly enriched in light rare earths; the high neodymium ratio at ST1 and ST40, relative to many other deposits worldwide, is a key economic driver. Historic intercepts at ST1 itself are superseded by the resource model, but the strongest drill samples cluster at the north-east end of the ST1 resource and in the ST1–ST40 corridor. Several 2023 samples exceeded the highest historic value, and the concentration of exceptionally high grades toward the north-east is a positive indication that grades increase in that direction, making the ST1–ST40 corridor a prime exploration target (Item 21).

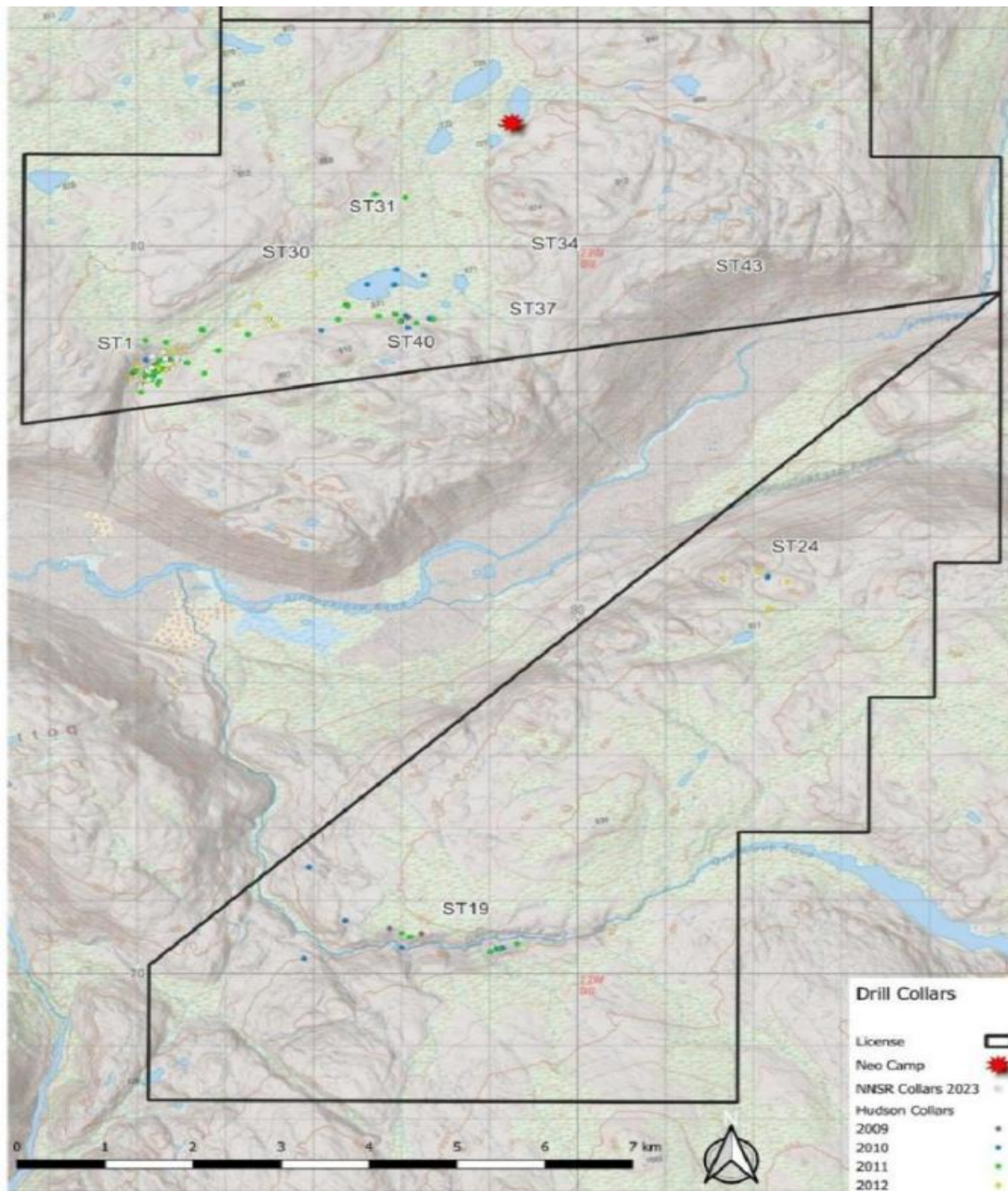


Figure 7-3. Drill-hole locations across the Sarfartoq Project.

Significant intercepts are not tabulated in this Item. A complete significant-intercept table would require, for every row, the source, the from-to interval, the apparent width, the true width where known, the analytical basis and the zone attribution, with occurrences outside ST1 separately labelled as exploration information. Those particulars are not available from the source for every intercept, and the Qualified Person does not file an incomplete table. Drill results informing the ST1 Mineral Resource are captured in the block model and are reported through the Mineral Resource statement at Item 11. Compilation of a complete significant-intercept table is listed at Item 23.

7.8 Bulk sampling

A 7-tonne bulk sample was collected by hand from a large surface showing at ST1 in 2011 (averaging 2.36% TREO, with neodymium about 21% of the TREO) under seal and was the basis for the 2011–2013 metallurgical test work at SRC, Hazen and SGS (Item 10).

7.9 Exploration potential

The ST1 zone is one of several mineralized targets on the approximately 32 km outer-ring structure of the complex; ST19, ST24, ST31, ST40 and ST43 lie on the same trends and have returned significant rare-earth mineralisation, and only a small fraction of the complex has been tested in detail. The ST1–ST40 corridor, indicated by both soil anomalies and the north-east-trending high-grade drill results, is the priority near-field target, and the Licence also includes niobium–tantalum and phosphate potential. This upside is described in Item 21 and is expressly not included in the Mineral Resource or the economic analysis.



Figure 7-4. Location of the ST1 and ST40 mineralized zones.

7.10 Exploration target — not a Mineral Resource

Exploration target — mandatory cautionary statement

The ranges of potential tonnage and grade of the exploration targets described in this section are conceptual in nature. There has been insufficient exploration of the relevant ground to estimate a Mineral Resource. It is uncertain if further exploration will result in the estimation of a Mineral Resource. The exploration targets therefore do not represent, and should not be construed to be, an estimate of a Mineral Resource or a Mineral Reserve.

Two exploration targets have been identified on the Licence. They are stated below as ranges of approximate tonnage and approximate grade, in accordance with § 229.1302(c). Neither is

a Mineral Resource. Neither is scheduled in the mine plan in Item 13, costed in Item 18, or included in the economic analysis in Item 19, and neither is additive to the Mineral Resource statement in Item 11.

Exploration target	Approximate tonnage range (Mt)	Approximate grade range (% TREO)	Basis
ST40 occurrence	2 – 6	2.0 – 3.0	Surface rock-chip sampling and widely spaced historic drill intercepts over a mapped strike length of approximately 900 m within the outer ring structure
Volume beneath the base of the re-cut underground inventory	4 – 7	1.45 – 1.64	Down-dip projection of the ST1 ferrocarbonatite dyke swarm below the lowest scheduled stope horizon, supported by drill intercepts that demonstrate continuity of mineralisation at depth. The volume between the pit floor and that horizon has been estimated as Mineral Resource (Item 11) and is excluded from this target.

Table 7-2. Exploration targets on the Sarfartoq Licence. The ranges are approximations and are conceptual in nature. They are not Mineral Resources and must not be reported or relied upon as such.

Ground for which no exploration target is stated. A third area — the ST1–ST40 corridor and the further carbonatite occurrences ST19, ST24, ST31, ST37 and ST43 — is considered prospective based on geophysics and mapping, but the information available is insufficient to define an exploration target for any of it, and none is stated.

Basis for the targets (§ 229.1302(c)(3)(i)). The conceptual geological model underlying both targets is the 2025 reinterpretation of the ST1 deposit described in Item 6: rare-earth mineralisation at Sarfartoq is hosted in subvertical ferrocarbonatite dyke swarms within the outer ring structure of the carbonatite complex, and the features formerly mapped as radioactive shear zones are those dyke swarms, with the radiometric response reflecting thorium carried in the mineralized carbonatite.

On that model the ST40 occurrence lies on the same outer ring structure as ST1, approximately 4 km along strike, and is interpreted as the same mineralising system at a higher tenor with a barite-bearing gangue assemblage. The deep target is the down-dip continuation of the ST1 dyke swarm itself beneath the underground component of the hybrid Mineral Resource: the

mineralisation is steeply dipping and laterally continuous, drilling demonstrates that it persists below the lowest scheduled stope horizon, and it is not closed off at depth.

Process used to determine the ranges (§ 229.1302(c)(3)(ii)). Calculation note — ST40. The tonnage range is the product of the mapped strike length of approximately 900 m, an interpreted true width range of 8 to 15 m, a projected depth extent of 100 to 150 m, and a dry bulk density of 3.02 t/m³, being the density assigned to carbonatite in the ST1 Mineral Resource estimate. The lower bound is accordingly $900 \times 8 \times 100 \times 3.02 = 2.17$ million tonnes and the upper bound is $900 \times 15 \times 150 \times 3.02 = 6.12$ million tonnes, stated as a range of approximately 2 to 6 million tonnes. The grade range of 2.0% to 3.0% TREO was derived from the interquartile spread of surface rock-chip assays and historic drill intercepts at ST40 and is unchanged.

Calculation note — the deep target. The tonnage range is the product of a modelled mineralized plan area of approximately 9,000 m², being an aggregate true width of about 15 m across the ST1 dyke swarm over a strike length of about 600 m, a vertical interval of 150 to 250 m below the lowest scheduled stope horizon, and a dry bulk density of 3.02 t/m³. The lower bound is accordingly $9,000 \times 150 \times 3.02 = 4.08$ million tonnes and the upper bound is $9,000 \times 250 \times 3.02 = 6.80$ million tonnes, stated as a range of approximately 4 to 7 million tonnes. The volume that has been estimated and classified as underground Mineral Resource and scheduled in Item 19 lies above the lowest scheduled stope horizon and is excluded, so that no part of the target duplicates the Mineral Resource. The grade range of 1.45% to 1.64% TREO is bounded by the grades of the underground Inferred and Indicated Mineral Resource respectively (Item 11), those being the source values for the projection.

Whether based on actual results or a proposed programme (§ 229.1302(c)(3)(iii)). Both targets are based in part on actual exploration results and in part on a proposed exploration programme. The exploration completed to date comprises, at ST40, geological mapping, surface rock-chip sampling, airborne and ground radiometric and magnetic surveys, and a small number of widely spaced historic drill holes; and, at the deep target, the 94 diamond drill holes for 23,094 m that inform the ST1 Mineral Resource estimate, several of which intersect mineralisation below the level of the scheduled stope horizons. Neither body of work is sufficient to estimate a Mineral Resource.

The exploration programme proposed to test the validity of the targets is set out in Item 23. It comprises diamond drilling on the ST40 occurrence and along the ST1–ST40 corridor at a spacing sufficient to demonstrate geological and grade continuity and to support estimation and classification of a maiden Mineral Resource if results warrant it, together with diamond drilling beneath the lowest scheduled stope horizon to test the deeper volume. Final drill metres and spacing are to be defined by an approved drilling and geostatistical design programme. Metallurgical testwork on ST40 composites is included in the recommended programme.

The ranges may change (§ 229.1302(c)(3)(iv)). The ranges of tonnage and grade stated above could change, materially and in either direction, as the proposed exploration activities are completed. They may also cease to be stated at all: the outcome of the proposed programme may be that no Mineral Resource can be estimated for either target.

7.11 *Qualified Person's opinion*

Qualified Person's opinion — exploration

In the QP's opinion the exploration completed at Sarfartoq is extensive and appropriate for an Initial Assessment. The ST1 zone has been drilled at a spacing sufficient to support a Mineral Resource estimate, the multi-method exploration dataset (radiometrics, magnetics, soil and rock geochemistry, and drilling) is internally consistent, and the targeting rationale is sound for this deposit style.

The exploration information is not yet sufficient to support a public, S-K 1300-compliant Mineral Resource. The most recent and most material data — the 2023 NNSR ST1 infill drilling — are unpublished and have not been independently validated; the property-wide drilling inventory and hole counts carried in earlier drafts should be reconciled to the drill database; and the historic, multi-operator data require the verification set out in Item 9. The exploration results in this section are relied upon as reported by the registrant and the historic operators, as further addressed in Item 25.

7.12 *References*

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective date 4 April 2025), Item 10 (Exploration) and Table 16-1 (ST1 drilling summary).

Druecker, M. and Simpson, R.G., 2012. Technical Report on the Sarfartoq Project, West Greenland (26 April 2012).

Greenland Mineral Resources Portal (greenmin.gl) — historic geophysical survey datasets.

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 Initial Assessment — Item 6 (geological setting), Item 8 (sample preparation, analyses and security), Item 9 (data verification), Item 11 (Mineral Resource estimate) and Item 21 (exploration potential and opportunities).

ITEM 8 — SAMPLE PREPARATION, ANALYSES AND SECURITY

Sample Preparation, Analyses and Security Summary

- Procedures are reported as supplied and have not yet been independently verified.
- Rare earth analysis requires a total-dissolution (fusion) method; confirmation is a priority.
- QA/QC, laboratory independence and chain of custody are to be compiled and assessed (Item 9).

This section reviews the sample preparation, analytical methods, quality assurance and quality control (QA/QC), laboratory procedures and sample security applied to the drilling database supporting the ST1 Mineral Resource. The available information indicates that industry-standard sampling and laboratory practices were generally employed throughout the exploration programmes. However, as the Project incorporates historical drilling completed by multiple operators together with unpublished 2023 drilling, the supporting documentation has not yet been independently verified by the Qualified Person.

Emphasis is placed on confirming that all rare earth analyses were undertaken using total-dissolution fusion methods, which are essential for the accurate determination of rare earth element grades in carbonatite-hosted mineralisation. Verification of laboratory independence, analytical protocols, QA/QC performance, and documented chain-of-custody procedures is also required before the database can fully support a public Mineral Resource Estimate under SEC S-K 1300.

The Qualified Person considers the available sampling and analytical database to be appropriate for an Initial Assessment, subject to completion of the planned data verification programme. Confirmation of analytical methodology, compilation and assessment of QA/QC records, and verification of sample security procedures are identified as the principal outstanding tasks required to establish the reliability of the exploration database for future public reporting.

8.1 Basis and status

In accordance with 17 CFR 229.601(b)(96)(iii)(B)(8), this Item describes the sample preparation, analytical procedures, laboratory information, quality assurance and quality control measures, sample-security procedures, and the Qualified Person's opinion on their adequacy for the purposes of this Technical Report Summary. This section discharges those requirements for the Sarfartoq ST1 Initial Assessment; the QA/QC results and the QP's assessment of them are set out separately in Item 9 (Data Verification).

The data comprise a multi-decade, multi-operator dataset: exploration and delineation drilling by Hudson Resources Inc. (2009–2012) and infill and step-out drilling by Neo North Star Resources Inc. (NNSR) in 2023–2024. The procedures described below are those documented in Items 11 and 12 of the 2025 Technical Report and reviewed by the QP. As noted in Items 7 and 9, the 2023–2024 data are unpublished and the historic data are of variable vintage; the procedures are relied upon as reported by the operators and remain to be independently validated (Item 9).

Element	Procedure adopted (2023–2024 NNSR programme)	Status / basis
Sample preparation	Half-core samples; at ALS crushed to $\geq 70\%$ passing 2 mm, riffle-split and pulverized to $\geq 85\%$ passing 75 μm . Preparation performed by the laboratory, not the registrant.	Documented (2025 TR §12.1); consistent with industry practice
Analytical method	Lithium-borate fusion followed by acid dissolution and ICP-MS/OES (ALS ME-MS81d; Actlabs 8-REE check package) — a total-dissolution technique.	Confirmed for 2023; total dissolution appropriate for refractory REE minerals
Element suite	Full fifteen-oxide rare-earth suite plus Th, U, Nb and major oxides; dedicated over-limit methods for Ce, Pr and Nb.	Documented (2025 TR §12.2)
Laboratory independence	ALS (primary, 2023) and Activation Laboratories (secondary 2023 / primary 2024); both corporately accredited to ISO 9001.	Independent commercial laboratories; prep not by registrant
QA/QC	Certified reference material (SARF-1), quartz-vein blanks, quarter-core duplicates and inter-laboratory check assays.	Applied; results assessed in Item 9
Sample security	Documented chain of custody from drill to laboratory (Item 8.6).	Documented (2025 TR §11.2); adequate

Table 8-1. Sample-preparation, analytical and security elements and their status. Source: QP, from the 2025 Technical Report.

8.2 Sample preparation

Drill core was logged and sampled at the secure project facility over geologically controlled intervals — a nominal two-meter sample length, adjusted to geological contacts, alteration zones and mineralogical variation. Core was split in half with an electro-hydraulic core splitter, and one half was bagged, uniquely numbered and sealed for dispatch. Sample preparation was not carried out by the registrant or its personnel: once the core was split and bagged, no further preparation was undertaken by NNSR, which supports the independence of the assay data. At the primary laboratory (ALS), drill-core samples were crushed to at least 70% passing 2 mm, riffle-split, and a representative split pulverized to at least 85% passing 75 µm — a standard preparation for this material. Soil samples were dried and sieved to –80 mesh on site.

8.3 *Analytical methods*

The 2023 drill-core samples were analyzed by ALS using the ME-MS81d package — rare earths and trace elements by ME-MS81 with major oxides by ME-ICP06 — in which the sample undergoes a lithium-borate fusion followed by acid dissolution and inductively-coupled-plasma mass spectrometry (ICP-MS). Dedicated over-limit methods were applied where required (ME-MS81h for high rare-earth grades, ME-OGREE for cerium and praseodymium over-limits, and ME-XRF15c for niobium over-limits). The 2009–2012 core was analyzed using the ME-MS81h and ME-MS61 packages. Inter-laboratory check analyses of 102 pulp splits were carried out at Activation Laboratories using its 8-REE package (lithium metaborate/tetra-borate fusion with ICP-OES and ICP-MS), returning the full rare-earth suite together with trace elements and major oxides.

Significantly, the lithium-borate fusion used in the 2023 programme is a total-dissolution technique that solubilizes most mineral species, including refractory rare-earth phases such as monazite. This confirms, for the 2023 data, that a total-dissolution method was used — the principal analytical-method concern raised in earlier drafts — so that rare-earth grades are not systematically under-reported. Equivalent confirmation for the full historic (2009–2012) dataset is carried forward as a verification task in Item 9.

Why the analytical method matters for rare earths

A partial digest (four-acid or aqua-regia) is not adequate for these mineralisation styles, because refractory rare-earth and resistate minerals such as monazite are incompletely dissolved and the rare-earth grades may be materially under-reported. A total-dissolution (fusion) method is therefore essential for a defensible Mineral Resource. The 2023 ALS package (ME-MS81d) and the Actlabs check package both employ a lithium-borate fusion and meet this requirement; confirming the same across all historic campaigns remains a priority verification task (Item 9).

8.4 *Laboratory independence and accreditation*

The analytical work was carried out at independent commercial laboratories. ALS was the primary laboratory in 2023, with sample preparation undertaken at ALS in Sweden and analysis

at ALS in Ireland; Activation Laboratories (Ancaster, Ontario) acted as the secondary (check) laboratory in 2023 and as the primary laboratory in 2024. Both laboratories are corporately accredited to ISO 9001. The laboratories are independent of the registrant, and sample preparation was performed by the laboratory rather than by the registrant's personnel. The metallurgical head assays were carried out at SGS Canada (Lakefield) (Item 10).

8.5 *Quality assurance and quality control*

A QA/QC programme was applied to the 2023–2024 sample stream, comprising the routine insertion of certified reference material (the project-specific SARF-1 standard), quartz-vein blanks and quarter-core field duplicates, together with an inter-laboratory check-assay programme to a second laboratory, and comparable controls were applied by Hudson in 2009–2012. The design, results and the QP's assessment of these controls — including two matters identified for resolution before public reporting (a small systematic over-estimation of rare-earth grades at the primary laboratory at higher grades, and an elevated thorium failure rate at that laboratory) — are set out in full in Item 9.

8.6 *Sample security and chain of custody*

A documented chain of custody was maintained from the drill to the laboratory. Core was emptied directly into wooden core boxes at the drill by the drilling contractor, covered, bound with fiber tape and transported by helicopter to the core shack at the Company's secure campsite, where it was logged, photographed, marked for sampling and split. Sampled half-core was bagged, uniquely numbered and sealed, then consolidated into super-sacks and flown by helicopter to Kangerlussuaq, where samples were held in a secured facility (the Air Greenland hangar) and a shipping warehouse before sea freight to Denmark, road transport to ALS in Sweden for preparation, and air freight of the prepared pulps to ALS in Ireland for analysis. Rock-chip and soil samples collected in 2024 were air-freighted via Copenhagen to Activation Laboratories. Sample information was recorded in hardcopy sample-ticket books and transcribed to digital spreadsheets and log forms, with the hardcopy books retained on site. Samples remained in the possession of NNSR personnel from collection until helicopter departure, after which only security-cleared airport personnel had contact with them. The remoteness of the site provides an additional measure of physical security. Because the mineralisation carries naturally occurring radioactive material (thorium; Items 6 and 17), sample handling and transport also carry a minor radiological-handling dimension.

8.7 *Adequacy and Qualified Person's opinion*

Qualified Person's Opinion — Sample preparation, analyses and security



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

S-K 1300 requires the QP to opine on whether the sample-preparation, security and analytical procedures are adequate. On the basis of the procedures documented in the 2025 Technical Report and reviewed by the QP, and subject to the limitations set out in Item 9, the QP's preliminary opinion is that the sample-preparation, analytical and security procedures applied to the 2023–2024 NNSR programme are adequate for, and appropriate to, an Initial Assessment. In particular, sample preparation was carried out by an independent accredited laboratory to industry-standard practice; the analytical method employed a lithium-borate fusion (total dissolution) appropriate for refractory rare-earth minerals; the laboratories are independent of the registrant; a QA/QC programme was in place; and a documented chain of custody was maintained from site to laboratory.

Full adequacy for the purpose of a public Mineral Resource estimate remains to be established and requires independent validation of the unpublished 2023–2024 data; confirmation of the analytical method and QA/QC for the historic (2009–2012) campaigns; resolution of the primary-laboratory grade bias and thorium performance identified in Item 9; and re-statement of the Mineral Resource to S-K 1300 definitions. Until that work is complete, the sample-preparation, analytical and security procedures are relied upon as reported by the registrant and the historic operators, as further addressed in Item 25.

8.8 *References*

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective date 4 April 2025), Item 11 (Chain of Custody) and Item 12 (Sample Preparation, Analyses and Security).

Druecker, M. and Simpson, R.G., 2012. Technical Report on the Sarfartoq Project, West Greenland (26 April 2012).

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 Initial Assessment — Item 7 (exploration and drilling), Item 9 (data verification), Item 11 (Mineral Resource estimate) and Item 25 (reliance on information provided by the registrant).

ITEM 9 — DATA VERIFICATION

Reliance on the Mineral Resource Estimate.

The Mineral Resource, the supporting drill-hole database, and the sample-preparation, analytical, security and data-verification information summarized in Items 8, 9 and 11 of this Initial Assessment are drawn from, and the Qualified Person has relied upon, the Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc. (the “MRE TRS”).

The 2023–2024 field, sampling and QA/QC programmes were managed and verified on site by Mr J.M. Felsman (Felsman Geologic Services LLC). The MRE TRS is the primary source for the Mineral Resource and its underlying data; this Initial Assessment does not reproduce it in full and should be read together with it. The author of this Initial Assessment relies on the issued MRE TRS and its responsible Qualified Persons for the Mineral Resource Estimate.

The author has reviewed the MRE TRS and relevant supporting information for reasonableness and has identified the additional verification and technical work required for PFS-level work and any future Mineral Reserve estimate. The author does not assume responsibility for the Mineral Resource Estimate, which remains the responsibility of the Qualified Persons who prepared it.

Matters carried forward from the MRE TRS.

The Qualified Persons responsible for the MRE TRS record three matters arising from the 2023 quality-control review: (i) the 2023 quality-control conclusions warrant corroboration by an experienced geochemist; (ii) the elevated thorium failure rate at the primary laboratory (35 of 51 SARF-1 analyses exceeding 10% variance) warrants further investigation; and (iii) a small but systematic over-estimation of rare-earth grades at the primary laboratory relative to the check laboratory, most pronounced at higher grades, warrants resolution, because laboratory selection could affect project economics.

These matters were considered by the Qualified Persons responsible for the Mineral Resource Estimate in issuing the MRE TRS. They are carried into the verification programme at Item 9.4 as work required to support PFS-level study and any future Mineral Reserve estimate.

The verification tasks listed at Item 9.4 are directed at raising the confidence of the database to the standard required for a Pre-Feasibility Study and for any future Technical Report Summary supporting Mineral Reserves. They are not conditions precedent to the filing of this Initial Assessment, which relies on the issued MRE TRS as set out above.

Data Verification Summary



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

- The 2023 drilling QA/QC review is compiled in Appendix F. Adoption of the database by the Qualified Persons responsible for the Mineral Resource Estimate is complete; a site visit by the author covering the 2023 programme, and closure of the laboratory matters recorded above, are required before PFS-level work.
- No QP personal inspection has yet been completed; "The Qualified Person considers that sufficient information was available to complete an Initial Assessment without materially affecting the technical conclusions."
- The data are adequate for this initial assessment but not yet for a public Mineral Resource.

This section describes the data verification procedures undertaken and the additional work required to establish the reliability of the technical database supporting the Sarfartoq ST1 Project. The current assessment is based on a substantial exploration database compiled over several decades by multiple operators, supplemented by recent drilling completed during 2023. While the available geological, analytical and metallurgical information provides an appropriate basis for an Initial Assessment, portions of the database remain subject to independent verification before they can support public Mineral Resource reporting under SEC S-K 1300.

The planned verification programme includes validation of drill-hole collar locations, downhole surveys, analytical results, laboratory certificates, quality assurance and quality control (QA/QC), analytical methodologies, bulk density measurements, and selected independent check assays. Emphasis is placed on confirming the analytical methods used for rare earth determination and independently validating the recently completed 2023 drilling programme.

In the Qualified Person's opinion, the available data are adequate to support the conceptual technical and economic evaluations presented in this Initial Assessment. However, completion of the planned verification programme is required before the database can be considered sufficiently validated to support an updated public Mineral Resource Estimate or more advanced engineering studies. These verification activities represent standard industry practice for projects progressing from historic exploration to formal public reporting.

9.1 Basis, purpose and responsibility

Item 9 of Regulation S-K 1300 (§ 229.601(b)(96)) requires the Qualified Person (QP) to describe the data-verification procedures applied to the data underpinning the Technical Report Summary, to disclose any limitations on, or failure to conduct, that verification and the reasons for it, and to give the QP's opinion on the adequacy of the data for the purposes used. This section discharges those requirements for the Sarfartoq ST1 Initial Assessment.

The drill-hole database and the Mineral Resource estimate that depends on it (Item 11) are the responsibility of, Mr. R. Simpson of GeoSim Services Inc.; this section sets out the verification framework for the Initial Assessment as a whole, summarizes the quality-assurance and quality-control (QA/QC) work carried out by the operators and compiled in the 2025 Technical

Report, and records its status. The dataset is a multi-decade, multi-operator compilation: exploration and delineation drilling by Hudson Resources Inc. (2009–2012) and infill and step-out drilling by Neo North Star Resources Inc. (NNSR) in 2023–2024. As noted in Items 7 and 8, the 2023–2024 data are unpublished and the historic data are of variable vintage; the registrant intends to have the data independently validated before they can support an updated, public Mineral Resource.

9.2 Verification procedures applied

The QA/QC and verification procedures applied to the Sarfartoq data, as documented in Item 13 of the 2025 Technical Report and reviewed by the QP, are summarized below. For the 2023 NNSR programme, control samples were inserted with the primary sample stream to ALS at a frequency of approximately one control in twenty-five, comprising certified reference materials, field duplicates and blanks, together with an inter-laboratory check programme to a secondary laboratory (Activation Laboratories, “Actlabs”). Comparable QA/QC was applied by Hudson during the 2009–2012 programmes. The full quality-control dataset — including the SARF-1 certified-value table, the inter-laboratory check-assay variance statistics and the control-by-control outcomes — is compiled in Appendix F.

Laboratories, accreditation and independence. The primary laboratory for the 2023–2024 programmes were ALS (Ancaster, Ontario) and the secondary (check) laboratory was Activation Laboratories (“Actlabs”, Ancaster, Ontario). Both laboratories are independent of the registrant and of the Qualified Person, and both are corporately accredited to ISO 9001. Drill-core preparation at ALS comprised crushing to better than 70% passing 2 mm, riffle-splitting, and pulverizing to better than 85% passing 75 µm; rare earths were determined by lithium-borate fusion with an ICP-MS/ICP-OES finish (ALS ME-MS81d, with ME-MS81h, ME-OGREE and ME-XRF15c for over-limits; Actlabs eight-REE fusion package on 102 pulp check splits). The fusion technique dissolves refractory rare-earth-bearing minerals and is appropriate for carbonate-hosted mineralisation. No sample preparation was undertaken by the registrant beyond splitting and bagging of core, and sample security at the remote site was considered more than adequate.

Verification element	Procedure (2023 programme; historic 2009–2012)	Result / QP comment
Certified reference materials (accuracy)	51 SARF-1 CRM inserted with samples to ALS (≈1 per 25); 5 also to Actlabs. SARF-1 prepared by CDN Resource Laboratories from ST1 material and certified by Smee & Associates via six-laboratory round-robin (2010). Historic: 17 NRCan OKA-2 (2009); 279 standards (2011).	Mean ALS results within two standard deviations of certified values for all rare earths (Nd all individual results within 2SD); Actlabs outperformed ALS; no result exceeded 20% variance and >10% variance rare for the rare earths. Thorium is the exception (mean out of tolerance; 35 of 51 ALS analyses >10%).

Verification element	Procedure (2023 programme; historic 2009–2012)	Result / QP comment
Blanks (contamination)	52 quartz-vein blanks inserted to ALS in 2023 (5 checked at Actlabs); historic granitic-gneiss blanks (277 in 2011).	Blank rare-earth content two to three orders of magnitude below mineralized carbonatite; no contamination flagged. 2011 blank mean 304 ppm. Note: the 2023 quartz-vein blank is not certified.
Field & laboratory duplicates (precision)	Quarter-core field duplicates plus split and pulp laboratory duplicates (51 field duplicates in 2023; 279 in 2011).	Field duplicates well correlated ($R^2 \approx 0.91$ Actlabs / 0.94 ALS); preparation and pulp duplicates excellent (R^2 up to 0.998). Scatter in individual pairs is consistent with drill-core-scale heterogeneity.
Inter-laboratory check assays	2023: 102 check analyses (primary ALS, secondary Actlabs), including duplicates, standards and blanks; historic check programme to ACME (2009).	Excellent correlation for La, Ce, Pr, Nd and Y — the elements carrying the bulk of the economic value; correlation weakens for the low-abundance heavy rare earths (limited economic impact). ALS consistently over-estimates rare-earth grades relative to Actlabs by a small amount, most pronounced at higher grades.
Core recovery	Recovery logged for all diamond drill core.	Median recovery >99.5% (mode 75%); overall >95%, the shortfall arising from near-surface overburden. No material recovery concern in the carbonatite.
Personal inspection / site visits	NNSR project manager (J. Felsman) on site throughout 2023–2024 overseeing sampling; earlier visits by M. Druecker (2010–2011) and R. Simpson (GeoSim, September 2010, who collected three verification core samples).	Simpson's three verification samples returned rare-earth values consistent with the reported intervals. A personal inspection by the signing Qualified Person has not yet been undertaken (Item 4).

Table 9-1. Data-verification procedures, results and Qualified Person comments.

9.3 Results and matters identified

Overall, the control data indicate that both the primary (ALS) and secondary (Actlabs) laboratories returned consistent, acceptable results across the history of the project, that accuracy and

precision are satisfactory for the light rare earths that carry the economic value, and that no sample mix-ups or losses were identified. Two matters were identified by the compiled QA/QC that require resolution before the data are used to support a public Mineral Resource or higher-level study, and are carried forward into the verification programme in Item 9.4:

(a) Systematic grade bias. The primary laboratory (ALS) shows a small but systematic over-estimation of rare-earth grades relative to the secondary laboratory; most pronounced at higher grades. Because reported grade drives the Mineral Resource and the economic analysis (Item 19), this bias must be quantified and resolved, including confirmation of the preferred laboratory and analytical method.

(b) Thorium performance. The thorium results at the primary laboratory show an elevated failure rate against the SARF-1 certified value (35 of 51 analyses exceeding 10% variance; the mean outside two standard deviations). Thorium is not an economic element but is relevant to the management of naturally occurring radioactive material (NORM) and the Greenland Uranium Act considerations addressed in Items 3 and 17.

The Qualified Person responsible for the MRE has expressly recommended that these conclusions be corroborated by an experienced geochemist before the 2023 drill data, or any resource estimate derived from it, is publicly reported. The Qualified Person for this Initial Assessment adopts that recommendation and treats it as a condition precedent to public Mineral Resource reporting (see the cautionary note at the head of this Section and §9.4).

The detailed findings supporting the above, together with additional limitations noted there — in particular that the 2025 verification was an internal review led by the geologist who managed the 2023–2024 drilling (rather than a fully independent verification), and that a single, internally-derived certified reference material (SARF-1) and an uncertified blank were used, with the standard checks not constituting true inter-laboratory checks because the reference material was consumed at the primary laboratory — are set out in full in Appendix F.

9.4 Database and analytical-method verification programme

The following programme is required to verify the data to the standard needed to support a public Mineral Resource estimate and to close the matters identified in Item 9.3. It is to be completed by, or under the direction of, the QP responsible for the Mineral Resource, in conjunction with the registrant. Its status as at the effective date of this report is shown.

Verification item	Scope	Status
Independent database validation	Collar, downhole survey, assay and logging tables reconciled to source records	No independent reconciliation described; verification rests on Felsman (the program manager, not

Verification item	Scope	Status
		independent) and Simpson's report review
Assays vs original certificates	Check a representative portion of the database against laboratory certificates	Felsman received and "evaluated" all 2023–24 certificates and found them in order — but that's the program manager, not a systematic independent check of a representative portion
Analytical-method confirmation	Analytical method — a lithium-borate fusion appropriate for refractory REE minerals is confirmed in the MRE (ALS ME-MS81d; Actlabs fusion). Residual: independent verification of method application and of the ALS/Actlabs grade bias.	Lithium-borate fusion confirmed (ALS ME-MS81d; Actlabs fusion), appropriate for refractory REE minerals
Independent (umpire) check assays	Re-assay of retained pulps / quarter-core at an independent laboratory	ALS↔Actlabs inter-lab checks (102) and the 2010 six-lab round-robin exist, but no dedicated umpire re-assay of retained pulps for the 2023 resource database
Thorium and grade-bias resolution	Investigate ALS thorium failures and the systematic rare-earth over-estimation at higher grades	Expressly left open — the MRE says the Th failures "warrant additional investigation" and the ALS over-estimation "warrants further investigation, as lab selection could impact project economics"
Bulk-density verification	Method, representativeness and values used in the estimate	The issued 2026 MRE documents the density dataset and assignments. The Initial Assessment author has not independently re-performed density verification
Twin-hole drilling	Validate selected historic intercepts, as warranted	Not undertaken; not mentioned in MRE Report

Table 9-2. Data-verification programme and status. Source: QP, in conjunction with the QP responsible for the Mineral Resource (Item 11).

9.5 *Limitations on verification*

Consistent with S-K 1300, the Initial Assessment author discloses the limitations on his supplementary verification. The 2023–2024 NNSR drilling was unpublished in the earlier 2025 internal update and has not been independently revalidated by the Initial Assessment author. The Mineral Resource used in this report is not that internal update; it is the issued MRE TRS prepared by GeoSim Services Inc. and Tetra Tech Canada Inc., effective 31 July 2026 and issued for use 16 August 2026.

The Initial Assessment author has reviewed that issued MRE TRS for reasonableness but has not independently re-performed the responsible MRE QPs’ database verification or resource estimation. Historic source records are not yet fully consolidated, and the Initial Assessment author has not personally inspected the property. Accordingly, this report relies on the verification and professional responsibility of the MRE QPs for Item 11. Their dated signatures and consents must be appended to this TRS before filing, and the outstanding supplementary checks should be completed before a Pre-Feasibility Study.

9.6 *Qualified Person's opinion on data adequacy*

Qualified Person's Opinion — Data adequacy

The issued 2026 MRE TRS is the definitive Mineral Resource source used in this Initial Assessment. Its responsible Qualified Persons report the database, QA/QC, density and estimation work supporting the Mineral Resource. The Initial Assessment author considers the issued MRE suitable for the conceptual assessment, subject to the reliance allocation in Items 11 and 25 and the requirement that the responsible MRE QPs sign and consent to this TRS before filing.

The Initial Assessment author's supplementary verification is not complete and does not independently support a separate Mineral Resource estimate. Public Mineral Resource disclosure in this report therefore depends on the issued 2026 MRE TRS and its responsible QPs. Before a higher-level study, the registrant should complete the outstanding source-record reconciliation, grade-bias and thorium review, independent check assaying where warranted, density confirmation and the Initial Assessment author's personal inspection. These items do not replace the MRE QPs' responsibility for Item 11.

9.7 *References*

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective date 4 April 2025), Item 13 (Data Verification).

Druecker, M. and Simpson, R.G., 2012. Technical Report on the Sarfartoq Project, West Greenland (26 April 2012).

Smee & Associates Consulting Ltd. / CDN Resource Laboratories Ltd., 2010–2011. Certification of the SARF-1 rare-earth reference material.

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 Initial Assessment — Item 7 (exploration and drilling), Item 8 (sample preparation, analyses and security), Item 11 (Mineral Resource estimate) and Item 25 (reliance on information provided by the registrant).

ITEM 10 — MINERAL PROCESSING AND METALLURGICAL TESTING

Metallurgical Testwork Summary

- Flotation test-work (SGS) demonstrates that a mixed rare-earth oxide concentrate can be produced. The adopted economic model assumes a saleable second-cleaner concentrate grade of approximately 8.25% TREO, derived from the life-of-mine feed grade, the adopted recovery and the concentrate mass pull.
- Recovery is applied once, at a conservative mine plan, with a sensitivity range.
- Test-work is bench-scale; locked-cycle and pilot confirmation are required.

Bench-scale metallurgical testwork completed by SGS Canada (Lakefield) demonstrates that conventional flotation is the preferred beneficiation method for the ST1 rare earth mineralisation, with flotation providing the only effective upgrading of the rare earth minerals. The best-performing batch flotation tests produced concentrate grades and recoveries that provide an appropriate preliminary basis for the Initial Assessment economic model, although the results are derived from single open-circuit laboratory tests and do not represent design-level plant performance.

The metallurgical evaluation confirms that the Mineral Resource grade should be used as the basis for the economic model rather than the higher-grade composite samples prepared for laboratory testing. The testwork also demonstrates that concentrate grade, mass pull and metallurgical recovery are interdependent and must be modelled consistently. The Qualified Person recommends that a single metallurgical recovery factor be applied within the DCF model, with concentrate grade derived directly from the demonstrated flotation performance, thereby avoiding any double application of recovery.

The Qualified Person considers the available metallurgical data to be appropriate for an Initial Assessment and preliminary economic evaluation. However, the results remain preliminary and require confirmation through locked-cycle flotation testing, pilot-scale studies, optimization of reagent schemes, and further concentrate marketing and payability assessments before they can be adopted for feasibility-level design. These programmes are expected to improve confidence in process performance and provide a more robust basis for future engineering, operating cost estimation and product marketing.

10.1 Basis and summary

Item 10 of Regulation S-K 1300 (§ 229.601(b)(96)) requires a description of the metallurgical test work and process studies carried out on the deposit, the analytical and testing laboratories used, and the Qualified Person's (QP) assessment of the adequacy of that work for the purposes of the report. This section summarizes the metallurgical test work on the Sarfartoq ST1 mineralisation from the 2009–2013 Hudson programmes through to the 2023 SGS Lakefield programme, and sets out the process basis and recovery, concentrate-grade and mass-pull assumptions adopted in the economic analysis (Item 19).

The test work establishes that conventional froth flotation is the only effective route demonstrated for upgrading the Sarfartoq rare-earth minerals; ore sorting, magnetic, electrostatic and gravity pre-concentration have all been tested without success. A 10.7% TREO concentrate grade was achieved on a 1.77% TREO test composite (F105) and is not the adopted life-of-mine economic-model grade; at the delivered life-of-mine head grade of 1.2591% TREO the adopted recovery and mass pull give a concentrate of approximately 8.25% TREO (Item 14.7). All results to date are bench-scale, open-circuit batch tests; no locked-cycle or pilot-scale test work has been completed, and the concentrate is a saleable product for off-site separation rather than a separated oxide.

10.2 Historical test work (2009–2013)

Metallurgical investigation began with a 7-tonne surface bulk sample collected by Hudson Resources Inc. from the ST1 zone in 2011 (averaging 2.36% TREO, with neodymium about 21% of the TREO), which was the basis for much of the 2011–2013 test work at the Saskatchewan Research Council (SRC), Hazen Research and SGS Lakefield. SRC completed Bond ball-mill work-index and flotation test work, and a 2011 Preliminary Economic Assessment prepared by Wardrop (a Tetra Tech company; effective 25 November 2011) adopted a conceptual flowsheet of a 2,000 t/d flotation plant recovering approximately 80% of the rare earths into a ~12% TREO concentrate, followed by acid bake, water leach, impurity removal and solvent extraction. Much of the work is summarized in a 2013 CIM Conference of Metallurgists paper (Goode et al.).

Mineralogy showed the rare earths distributed principally across monazite, bastnäsite and synchysite, in fine-grained intergrowths (average grain size below 20 µm) with dominantly acid-soluble carbonate gangue (Table 10-1).

Rare-earth mineral	Contribution to total REE (%)	Character
Monazite	68.2%	Refractory REE phosphate
Bastnäsite	22.5%	REE fluorocarbonate
Synchysite	6.8%	REE fluorocarbonate

Rare-earth mineral	Contribution to total REE (%)	Character
Fe–Ce carbonate / oxide	0.7%	Minor
Fe–Mg ankerite (red / white)	1.7%	Carbonate host / gangue

Table 10-1. Principal rare-earth minerals identified in the historical metallurgical test work.

More than one hundred flotation tests were completed over this period; the best SGS conditions (grind 80% passing 32 µm, Silicate N depressant, a T610 / emulsified-SHD collector at about 4 kg/t, and elevated conditioning and flotation temperatures) achieved 73% rare-earth recovery into a 25% mass concentrate, while the end-2013 best cleaner results were about 20% TREO at 43% recovery, or 12% TREO at about 55% recovery, from the same test.

Hydrometallurgical test work showed that the light rare earths could be leached — greater than 90% extraction after a high-temperature roast — but with very high acid demand (about 920 kg/t HCl) arising from the high ankerite (carbonate) content, and with poorer extraction of the heavy rare earths that fluoride metathesis only partly resolved. These historic results frame the flowsheet but pre-date the current drilling and composites.

10.3 Recent test work — 2023 SGS Lakefield programme

A beneficiation programme was carried out for Neo North Star Resources Inc. at SGS Canada (Lakefield) in 2023 (Project 19446-02A), on approximately 460 kg of drill-core sample forming two composites — the ST1 composite and the Master composite. The programme comprised head characterization, mineralogy, grindability, ore sorting, magnetic separation and batch flotation; as in the historic work, flotation was the only effective beneficiation route. The 2025 Technical Report records that the two 2023 composites differed markedly from one another and from the decade-old bulk sample: the ST1 composite was dominated by burbankite, ancylite, bastnäsite, synchysite and monazite (burbankite being an unusual Ca–Sr–Ba–Na carbonate carrying roughly 15% TREO, which follow-up mineralogy could not re-identify), while the Master composite resembled the earlier bulk sample but at lower head grade and with more than double the apatite content. This variability underlines the fine-grained, mineralogically complex nature of the mineralisation.

Fifty-seven batch tests were run on the ST1 composite and twenty on the Master composite; test F37 (ST1 composite) and test F105 (Master composite) were the best result for each. F37 produced a 19.4% TREO concentrate at 57% recovery; F105 produced an approximately 10.7% TREO concentrate at 62% recovery — higher recovery than the earlier Hudson work, with the lower grade attributable to the high apatite content. Attempts to depress or pre-float the apatite achieved only limited success before the programme was placed on hold, and no hydrometallurgical test work was undertaken in the recent programme.

10.4 Flowsheet and conditions

Both selected tests used the optimized reagent suite developed on ST1 material: a PAM200/AM810 collector mixture (about 1:3), sodium-fluorosilicate and lignin-sulphonate (F220) depressants, high-intensity conditioning at high pulp density, a rougher pulp density of about 35%, an elevated pulp temperature of 70 °C, and a primary grind of $P_{100} \approx 38 \mu\text{m}$ ($P_{80} \approx 27 \mu\text{m}$). Test F105 added citric acid (100 g/t) and a higher depressant dosage to depress apatite. The flowsheet is a rougher plus rougher-scavenger stage followed by two cleaning stages, with the second-cleaner concentrate as the saleable product.

Figure 10-1. Conceptual beneficiation test-work flowsheet used to frame the metallurgical assessment.

10.5 Results

The two best batch results, on a second-cleaner-concentrate basis, are summarized below.

Parameter (2nd-cleaner concentrate)	F37 — ST1 Comp	F105 — Master Comp
Composite head grade (TREO)	3.21%	1.77%
Final concentrate grade (TREO)	19.4%	10.7%
Mass pull to final concentrate	9.7%	9.7%
Upgrade ratio (concentrate ÷ head)	$\approx 6.0\times$	$6.05\times$
TREO recovery — cerium proxy	57.0%	62.2%

Parameter (2nd-cleaner concentrate)	F37 — ST1 Comp	F105 — Master Comp
Nd recovery	54.5%	63.6%
Rougher + scavenger recovery (Ce)	86.8%	77.9%
Dominant REE mineralogy	burbankite-rich	monazite / bastnäsité
Main gangue in concentrate	carbonate 21%, apatite 17%	apatite 42%, carbonate 34%

Table 10-2. Selected second-cleaner flotation results.

The key relationship for the economic model is that, in both tests, recovery equals mass pull multiplied by the upgrade ratio: $9.7\% \times 6.0 \approx 57\%$ for F37, and $9.7\% \times 6.05 \approx 59\%$ for F105 on the cerium proxy. The upgrade ratio for F105 is the concentrate grade divided by the head grade of the test composite, $10.7\% \div 1.77\% = 6.05\times$. Recovery, mass pull and upgrade ratio are therefore not independent quantities and must not be combined as though they were.

10.6 Recovery basis and single application of recovery

Qualified Person's Opinion — Recovery basis

In flotation, the mass pull multiplied by the upgrade ratio is itself the metallurgical recovery; it is not an intermediate step to be multiplied by a further recovery factor. Applying a concentration ratio and then a separate recovery factor would double-count and materially understate recovery. The economic model adopted in this report (Item 19) applies recovery once, at the demonstrated level of 63.6%, being the neodymium recovery achieved on the F105 Master Composite and applies payability separately and after it.

The mine plan adopts a single metallurgical recovery of 63.6% of contained TREO to the saleable second-cleaner concentrate. That figure is the neodymium recovery measured on the SGS F105 Master Composite. Neodymium is a principal value driver in the economic basket. The cerium-proxy result on the same composite was 62.2% and is identified as such wherever it appears; the two are not averaged. Recovery is applied once, at the concentration stage, and is not compounded with any further recovery factor. A conservative / scale-risk floor of 55% and an upside of 70% are carried in the recovery sensitivity analysis (Item 19.7); neither is the adopted basis. Concentrate grade and mass pull are fixed consistently with the adopted recovery.

10.7 Concentrate quality and deleterious constituents

The saleable concentrate is low-grade by rare-earth standards and heavily diluted with gangue: in F105 the second-cleaner concentrate comprised approximately 42% apatite and 34% carbonate, with only about 21% rare-earth minerals. Apatite at Sarfartoq carries only about 0.5% TREO and is effectively pure dilution, which increases freight cost per unit of contained TREO and bears directly on the payability an off taker will offer (Item 16). Because the mineralisation



and concentrate also carry thorium (naturally occurring radioactive material), concentrate handling, storage and transport have a radiological-management dimension addressed in Item 17. Apatite rejection, and the downstream cracking-and-leaching route for the concentrate, are the principal metallurgical development priorities.

10.8 Adopted metallurgical parameters

The metallurgical parameters adopted in the economic analysis, consistent with Items 16 and 19, are summarized below.

Parameter	Adopted (mine plan)	Basis
ROM head grade — open pit / underground	1.499% / 1.486% TREO; life-of-mine delivered weighted average 1.2591% TREO	Final model values from the mine production schedule (Items 11 and 13), delivered basis
Concentrate grade (TREO)	8.25%	Derived from the mass balance: head grade $\times$ recovery $\div$ mass pull
Mass pull to concentrate	9.7%	F37 / F105
Metallurgical recovery — measured, Ce proxy	62.2%	F105 (Master Comp)
Metallurgical recovery — measured, Nd	63.6%	F105 (Master Comp)
Metallurgical recovery — adopted	63.6%	The neodymium result from the F105 Master Composite; neodymium is a principal value driver in the economic basket (Item 16.6)
Recovery — sensitivity range	55.0% (low) – 70.0% (upside)	Applied consistently in Items 10, 14, 19 and Appendix A
Payability (concentrate) — derived	75.4% (derived from the toll)	Item 16.7.6

Table 10-3. Metallurgical parameters adopted in the mine plan and economic analysis.

10.9 Qualified Person's opinion

Qualified Person's Opinion — Metallurgy

In the QP's opinion the available metallurgical test work is adequate to support an Initial Assessment. It establishes flotation as the effective beneficiation route, demonstrates a concentrate grading approximately 8.3% TREO at a recovery of 63.6% from mill feed at the delivered Mineral Resource grade, and provides an internally consistent grade–mass–pull–recovery relationship for the economic model. The 2023 SGS programme was undertaken by an established, independent metallurgical laboratory.

The results are not adequate for a higher-level (pre-feasibility or feasibility) study and require locked-cycle flotation and pilot-scale confirmation on grade-representative composites, including composites representative of the underground feed that supplies approximately 40 per cent of life-of-mine mill feed; optimization of the reagent scheme and apatite rejection to lift concentrate grade; renewed hydrometallurgical (cracking, leaching and impurity-removal) test work to define the downstream route and reagent consumption; and concentrate marketing and payability confirmation with a prospective off-taker. Consistent with the 2025 Technical Report, a fuller understanding of the deposit's mineralogy — which varies significantly between composites — is a priority, as it may allow definition of zones more amenable to processing.

10.10 References

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update (effective date 4 April 2025), Item 15 (Mineral Processing and Metallurgical Testing).

SGS Canada Inc. (Lakefield), 2023–2024. Beneficiation test work, Project 19446-02A (ST1 and Master composites; tests F37 and F105).

Goode, J.R., Yu, B., Verbaan, N., Cambon, J. and Tuer, J., 2013. A Process Route for the Sarfartoq Rare Earth Project, Greenland. CIM Conference of Metallurgists.

Wardrop (a Tetra Tech company), 2011. Preliminary Economic Assessment on the Sarfartoq Rare Earth Element Project, Greenland (effective 25 November 2011).

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 Initial Assessment — Item 11 (Mineral Resource estimate), Item 16 (market and payability), Item 17 (environment and NORM) and Item 19 (economic analysis).

ITEM 11 — MINERAL RESOURCE ESTIMATES

Basis and reliance. The Mineral Resource Estimate reproduced in this Item is taken from the technical report summary “S-K 1300 Technical Report Summary: Sarfartoq Rare Earths Project, West Greenland”, prepared for Greenland Mines Ltd by GeoSim Services Inc. and Tetra Tech Canada Inc. (file 704-ENG.VMIN03496-01), issued for use on 16 August 2026 with an effective date of 31 July 2026 (the “MRE”).

The Mineral Resource estimate was prepared by Mr Ronald G. Simpson, P.Geo., of GeoSim Services Inc., who is the qualified person responsible for it; Mr Hassan Ghaffari, P.Eng., M.A.Sc., of Tetra Tech Canada Inc. is the qualified person responsible for the mining, optimization and cost inputs to the reasonable-prospects test.

The estimate is stated to be consistent with the CIM Definition Standards and reported in accordance with subpart 1300 of Regulation S-K.

The author of this initial assessment has reviewed the MRE and relies upon it for this Item and for all dependent disclosure. The author does not assume responsibility for the estimate, which remains the responsibility of the qualified persons who prepared it. Every tonnage and grade reported in this Item is as reported in the MRE; no figure has been re-estimated, re-classified or re-cut for the purposes of this report.

11.1 Summary

- Indicated and Inferred Mineral Resources have been estimated for the ST1 zone. The MRE reports the estimate independently for three mining scenarios — a stand-alone underground scenario, a stand-alone surface open-pit scenario, and a hybrid open-pit and underground scenario. This initial assessment adopts the hybrid scenario and no other. No Measured Mineral Resource has been estimated, and no Mineral Reserve has been estimated.
- The estimate is supported by 94 BTW diamond drill holes for 23,094 m, drilled between 2009 and 2023, with 12,099 assay intervals over 22,041 m sampled, and by the sampling, analytical and data-verification record described in Items 7 to 9.
- The hybrid scenario was optimized independently of the two stand-alone scenarios, using the same price, recovery and cost assumptions with the addition of an underground development cost for the transition between the open pit and the underground, and a 20 m exclusion zone representing non-recoverable material at the interface. Its open-pit and underground components are therefore spatially exclusive and additive. The stand-alone underground and open-pit scenarios reported in the MRE overlap one another, are alternatives rather than components, and are not additive; they are not used in this report.
- The economic analysis in Item 19 is founded on the hybrid Mineral Resource in full, mined in the sequence described in Item 13 — open pit in Years 1 to 4, underground in Years 4 to 7, and the deferred open-pit Inferred stockpile in Years 7 to 9. The open-pit

Inferred Mineral Resource, at 0.67% TREO, clears the incremental cut-off applicable to material already mined and is stockpiled during the open-pit phase and reclaimed to the mill in Years 7 to 9 (Items 11.4 and 13.4.1).

- Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. The inclusion of Inferred Mineral Resources in the economic analysis means that analysis is preliminary.

The ST1 Mineral Resource has been estimated by inverse-distance-squared interpolation of a domained block model and is reported for the hybrid scenario within an optimized open-pit shell and a set of optimized underground stope shapes lying beneath it, separated by a 20 m exclusion zone. The MRE reports the hybrid Mineral Resource as 6.90 Mt of Indicated Mineral Resource at 1.60% TREO and 5.341 Mt of Inferred Mineral Resource at 0.96% TREO, a total of 12.24 Mt at 1.32% TREO. Within that total the open-pit component comprises 3.979 Mt Indicated at 1.57% TREO and 3.329 Mt Inferred at 0.67% TREO, and the underground component comprises 2.918 Mt Indicated at 1.64% TREO and 2.012 Mt Inferred at 1.45% TREO, net of the exclusion zone. Neodymium and praseodymium oxides, with terbium and dysprosium, are the principal value drivers; lanthanum and cerium oxides were estimated but carry no value in the reasonable-prospects test.

11.2 Estimation methodology, density and classification

The estimate is based on the validated drilling, sampling and assay data described in Items 7 to 9 and the geological model in Item 6. Lithology was interpreted in Leapfrog and a solid model built for the main intrusive carbonatite bodies; within the surrounding gneiss complex, indicator kriging was used to define a 0.5% TREO grade shell constraining the estimate to mineralized ground. Two estimation domains were carried — the carbonatite domain, which hosts the bulk of the mineralisation and averages 1.68% TREO on composites, and the gneiss grade shell, which averages 0.65% TREO — with hard boundaries between them. Dry bulk density was assigned from specific-gravity measurements on 1,785 core samples: 3.02 t/m³ for the carbonatite, being the median of 385 measurements, and 2.72 t/m³ for the gneiss, being the mean of 1,105 measurements. Drill samples were composited to 2 m by domain on a best-fit basis, unsampled intervals within the domains being assigned zero grade and diluted accordingly. A log-probability and decile review of the principal oxides concluded that no grade capping or special treatment of outliers was warranted.

A block model was built in Surpac Vision on a 5 m by 5 m by 5 m parent block sub-blocked to 1.25 m. Normalised semi-variogram models for Nd₂O₃ in the carbonatite domain gave maximum ranges of 90 m. Rare-earth oxide grades were estimated by the inverse-distance-squared method in two passes, using an anisotropic search ellipse aligned with the carbonatite trend, which plunges 49° towards an azimuth of 227° with a tilt of 55°: a first pass to a maximum search of 60 m and a second pass to 150 m, each requiring a minimum of five composites drawn from at least two drill holes and limiting any one hole to four composites. Nearest-neighbour and ordinary-kriging estimates were produced for validation, and the model was validated by visual inspection, global mean comparison against composites and swath plots on

both drift directions. Blocks estimated within the main carbonatite domain on the first pass were classified Indicated; all other estimated blocks were classified Inferred. No Measured Mineral Resource was defined.

11.3 Drill-hole database

The ST1 estimate is supported by 94 BTW-size diamond core holes drilled between 2009 and 2023 for 23,094 m, with 12,099 assay intervals over 22,041 m sampled. Core recovery is generally high, with a median above 99.5% and overall recovery above 95%; 75% is the modal value and not the average. The shortfall against 100% arises in near-surface overburden and unconsolidated sediment. The database includes interval tables for lithology, alteration, degree of oxidation and mineralogy or veining.

Year	Holes	Meters	Assay Intervals	Meters Sampled	Core Size
2009	4	573.40	216	392.55	BTW
2010	15	4162.90	3001	3790.10	BTW
2011	44	10550.92	4463	8949.1	BTW
2012	14	3578.17	1612	3230.42	BTW
2023	17	4228.90	1692	3455.75	BTW
Total	94	23094.29	12099	22040.64	BTW

Table 11-1. Drill-hole database supporting the ST1 Mineral Resource estimate.

11.4 Cut-off basis and economic parameters

Two distinct economic tests bear on this Item and they must not be confused. The first is the reasonable-prospects-for-eventual-economic-extraction test applied within the MRE by the qualified person responsible for the estimate; it is expressed as a net smelter return cut-off in dollars per tonne and it determines what is reported as Mineral Resource. The second is the cut-off implied by the capital and operating cost estimate and the price and payability assumptions adopted for the initial assessment at Item 19; it is expressed as a percentage of total rare-earth oxide, and it determines what is scheduled to the mill. Both are set out below.

Parameter	MRE basis (as reported in the MRE)	Initial assessment basis (Item 19)
Price basis	Per-oxide deck: Pr ₆ O ₁₁ US\$145/kg, Nd ₂ O ₃ US\$150/kg, Tb ₄ O ₇ US\$3,500/kg, Dy ₂ O ₃ US\$750/kg, Gd ₂ O ₃ US\$225/kg, Eu ₂ O ₃ US\$30/kg, Y ₂ O ₃ US\$16/kg, Sm ₂ O ₃	Distribution-weighted basket of US\$51.88/kg contained TREO on the Strategic Western basis (Items 16.5 and 16.6)

Parameter	MRE basis (as reported in the MRE)	Initial assessment basis (Item 19)
	US\$10/kg. La ₂ O ₃ and Ce ₂ O ₃ carry no value.	
Metallurgical recovery	64%	63.6% (Item 10.8)
Payability	60%, adopted	75.4%, derived from a fixed toll of US\$12.74/kg contained TREO (Item 16.7.6)
Royalty and other deductions	5% ad valorem royalty on revenue; 0.5% insurance on revenue	5% ad valorem royalty on gross revenue (Item 3.4)
Mining cost	US\$6.00/t mined open pit; US\$55.00/t mined underground; US\$1.00/t underground development in the hybrid case	US\$6.00/t ore open-pit phase; US\$55.00/t ore underground; US\$1.50/t stockpile rehandle (Item 18.2)
Processing and G&A	US\$69.72/t processed and US\$16.50/t processed, at a 700,000 tpa plant feed rate	US\$67.50/t and US\$9.00/t, plus US\$2.50/t logistics, at a 1.4 Mt/a plant feed rate (Item 18.2)
Resulting cut-off	NSR US\$92.22/t for the open-pit component; NSR US\$141.22/t for the underground component	0.37% TREO marginal; 0.35% TREO incremental for material already mined and stockpiled

Table 11-2. The two cut-off bases. The left-hand column governs what is reported as Mineral Resource; the right-hand column governs what is scheduled in the economic analysis.

The Mineral Resource reported at Item 11.5 is reported above the MRE cut-offs and is not restated at the initial-assessment parameters. The two bases differ, principally in payability — the MRE adopts 60% while this report derives 75.4% from a toll stack — and in the plant feed rate assumed for the fixed-cost components. The direction of those differences is what matters: on the assumptions adopted for the initial assessment, revenue per tonne is higher and unit processing and administrative costs are lower than on the MRE basis, so the initial-assessment test is the less restrictive of the two. It follows that no material excluded from the Mineral Resource by the MRE cut-off is brought into the mine schedule, and that every tonne reported as Mineral Resource clears the economic test applied in Item 19. The reconciliation between the cost estimate at Item 18 and the cut-off basis is set out at Item 18.3.

Every component of the Mineral Resource clears its applicable cut-off on both bases. On the initial-assessment basis, two cut-off grades follow from the parameters in the right-hand column above: material that must carry its own mining cost is tested at a marginal cut-off of 0.37% TREO, and material mined in any event during the open-pit phase and subsequently stockpiled is tested on an incremental basis at 0.35% TREO, because its mining and stripping cost is committed by the Indicated ore. The lowest-grade component of the resource, the open-pit Inferred Mineral Resource at 0.67% TREO, clears the incremental cut-off by a factor of approximately 1.9 and the full-cost marginal cut-off by a factor of approximately 1.8.

Cut-off basis

Two distinct cut-off tests bear on this report and they are not interchangeable. The Mineral Resource is reported above the net smelter return cut-offs applied in the MRE, being US\$92.22 per tonne for the open-pit component and US\$141.22 per tonne for the underground component. The cut-off applied in the mine schedule is computed from the assumptions used in the cash flow and is expressed as a percentage of total rare-earth oxide: 0.37% TREO on a marginal basis and 0.35% TREO on an incremental basis for material already mined and stockpiled. Table 11-2 states both bases side by side. The initial-assessment test is the less restrictive of the two, so every tonne reported as Mineral Resource clears the economic test applied at Item 19.

The qualified person responsible for the Mineral Resource estimate has confirmed in the MRE that the estimate has reasonable prospects for eventual economic extraction on the basis set out in the left-hand column above. That determination is a necessary condition of reporting a Mineral Resource and is not a determination of economic viability. The author of this report has satisfied himself that the economic test applied in Item 19 is consistent with, and no more permissive than, that determination.

11.5 Mineral Resource statement

Status of the estimate — issued

The Mineral Resource estimate reproduced in this Item is the estimate contained in the technical report summary issued for use by GeoSim Services Inc. and Tetra Tech Canada Inc. on 16 August 2026, with an effective date of 31 July 2026. The estimate is signed by the qualified persons responsible for it. The figures in Table 11-3 have been checked against that document line by line and agree with it. The tonnages and grades carried into Items 13 and 19 of this report are the figures below and no others.

The ST1 Mineral Resource is classified as Indicated and Inferred. The hybrid total rows below are reproduced from the MRE. Beneath them the estimate is disaggregated into its open-pit and underground components, taken from the optimization model supporting the MRE. The underground component lies wholly beneath the base of the optimized pit shell and is further reduced by the 20 m exclusion zone described at Item 13.3. The two components therefore do not overlap, they are additive, and the hybrid total is the sum of its two components. The MRE also

reports stand-alone underground (10.08 Mt at 1.51% TREO) and stand-alone open-pit (12.62 Mt at 1.27% TREO) scenarios. Those are alternative mining scenarios evaluated over overlapping volumes. They are not additive to one another or to the hybrid, and they are not used anywhere in this report.



Agricola
MINING CONSULTANTS

Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

Underground Mineral Resource:

Class	Ore Tonnes (000's)	TREO %	Magnet Basket									
			Full Basket									
			TREO %									
			Pr ₆ O ₁₁ ppm	Nd ₂ O ₃ ppm	Tb ₄ O ₇ ppm	Dy ₂ O ₃ ppm	Eu ₂ O ₃ ppm	Gd ₂ O ₃ ppm	Sm ₂ O ₃ ppm	Y ₂ O ₃ ppm	Ce ₂ O ₃ ppm	La ₂ O ₃ ppm
Indicated	7,475	1.56	944	3,009	13.0	31.8	66.9	160	298	63.7	7,784	3,268
Inferred	2,603	1.36	774	2,443	9.3	25.9	51.6	113	231	57.0	6,764	3,092
Total	10,078	1.51	900	2,863	12.1	30.3	62.9	148	281	62.0	7,520	3,222

Notes:

1. Mineral resource estimate prepared by Ronald G. Simpson of GeoSim Services Inc. with an effective date of July 31st, 2026.
2. Mineral Resources are estimated consistent with CIM Definition Standards and reported in accordance with S-K 1300.
3. Mineral resources are not mineral reserves and do not have demonstrated economic viability.
4. Mineral resources are stated using the following assumptions: REO prices as listed in Table 1-1; assumed deductions of metallurgical recovery of 64%, payability of 60%, royalties of 5%, and insurance of 0.5%; underground mining costs of US\$55 per tonne; processing costs of US\$69.72 per tonne; G&A of US\$16.50/t and using the full basket NSR optimization.
5. The base case NSR cut-off of \$141.22/t is believed to provide a reasonable margin over operating for underground mining and processing
6. Totals may not sum due to rounding.

Table 11-2a. Underground Mineral Resource table derived from Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc.

Open Pit Mineral Resource:

Class	Ore Tonnes (000s)	TREO %	Magnet Basket										
			Full Basket										
			TREO %										
			Pr ₆ O ₁₁ ppm	Nd ₂ O ₃ ppm	Tb ₄ O ₇ ppm	Dy ₂ O ₃ ppm	Eu ₂ O ₃ ppm	Gd ₂ O ₃ ppm	Sm ₂ O ₃ ppm	Y ₂ O ₃ ppm	Ce ₂ O ₃ ppm	La ₂ O ₃ ppm	
Indicated	6,608	1.63	979	3,114	13.5	32.9	69.0	168	307	65	8,108	3,444	
Inferred	6,015	0.88	516	1,648	6.9	18.9	36.3	82	164	44	4,304	1,893	
Total	12,623	1.27	758	2,415	10.4	26.2	53.4	127	239	55	6,295	2,705	

Notes:

1. Mineral resource estimate prepared by Ronald G. Simpson of GeoSim Services Inc. with an effective date of July 31st, 2026.
2. Mineral Resources are estimated consistent with CIM Definition Standards and reported in accordance with S-K 1300.
3. Mineral resources are not mineral reserves and do not have demonstrated economic viability.
4. Mineral resources are constrained by an optimized pit shell using the following assumptions: REO prices as listed in Table 1-1; assumed deductions of metallurgical recovery of 64%, payability of 60%, royalties of 5%, and insurance of 0.5%, open pit mining costs of US\$6 per tonne; processing costs of US\$69.72 per tonne; G&A of US\$16.5/t and using the full basket NSR optimization.
5. The base case NSR cut-off of \$92.22/t is believed to provide a reasonable margin over operating costs for open pit mining and processing
6. Totals may not sum due to rounding.

Table 11-2b. Open Pit Mineral Resource table derived from Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc.

Hybrid Mineral Resource:

Class	Ore Tonnes (000s)	TREO %	Magnet Basket									
			Full Basket									
			TREO %									
			Pr ₆ O ₁₁ ppm	Nd ₂ O ₃ ppm	Tb ₄ O ₇ ppm	Dy ₂ O ₃ ppm	Eu ₂ O ₃ ppm	Gd ₂ O ₃ ppm	Sm ₂ O ₃ ppm	Y ₂ O ₃ ppm	Ce ₂ O ₃ ppm	La ₂ O ₃ ppm
Indicated	6,900	1.60	963	3,070	13.2	32.3	67.9	163	304	65	7,972	3,355
Inferred	5,341	0.96	572	1,850	7.4	20.4	39.7	89	181	47	4,761	2,053
Total	12,240	1.32	792	2,538	10.7	27.1	55.6	131	250	57	6,571	2,787

Notes:

1. Mineral resource estimate prepared by Ronald G. Simpson of GeoSim Services Inc. with an effective date of July 31st, 2026.
2. Mineral Resources are estimated consistent with CIM Definition Standards and reported in accordance with S-K 1300.
3. Mineral resources are not mineral reserves and do not have demonstrated economic viability.
4. Mineral resources are constrained by an optimized pit shell using the following assumptions: REO prices as listed in Table 1-1; assumed deductions of metallurgical recovery of 64%, payability of 60%, royalties of 5%, and insurance of 0.5%; open pit mining costs of US\$6 per tonne; processing costs of US\$69.72 per tonne; G&A of US\$16.5/t and using the full basket NSR optimization.
5. The base case NSR cut-off of \$92.22/t is believed to provide a reasonable margin over operating costs for the open pit mining and processing component. The base case NSR cut-off of \$141.22/t is believed to provide a reasonable margin over operating costs for underground mining and processing component.
6. Totals may not sum due to rounding.

Table 11-2c. Hybrid Mineral Resource table derived from Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc.

Open Pit Component of Hybrid	Tonnes	TREO	La ₂ O ₃	CeO ₂	Pr ₆ O ₁₁	Nd ₂ O ₃	Sm ₂ O ₃	Eu ₂ O ₃	Gd ₂ O ₃	Tb ₄ O ₇	Dy ₂ O ₃	Ho ₂ O ₃	Er ₂ O ₃	Tm ₂ O ₃	Yb ₂ O ₃	Lu ₂ O ₃	Y ₂ O ₃
Indicated	3,979,000	1.57%	0.336%	0.784%	0.094%	0.297%	0.029%	0.006%	0.017%	0.001%	0.003%	0.00%	0.00%	0.00%	0.00%	0.00%	0.006%
Inferred	3,329,000	0.67%	0.124%	0.327%	0.043%	0.144%	0.015%	0.003%	0.007%	0.001%	0.002%	0.00%	0.00%	0.00%	0.00%	0.00%	0.004%
Underground Component of Hybrid	Tonnes	TREO	La ₂ O ₃	CeO ₂	Pr ₆ O ₁₁	Nd ₂ O ₃	Sm ₂ O ₃	Eu ₂ O ₃	Gd ₂ O ₃	Tb ₄ O ₇	Dy ₂ O ₃	Ho ₂ O ₃	Er ₂ O ₃	Tm ₂ O ₃	Yb ₂ O ₃	Lu ₂ O ₃	Y ₂ O ₃
Indicated	3,040,000	1.64%	0.335%	0.815%	0.100%	0.320%	0.032%	0.007%	0.016%	0.001%	0.003%	0.00%	0.00%	0.00%	0.00%	0.00%	0.007%
Inferred	2,026,000	1.45%	0.339%	0.723%	0.081%	0.253%	0.024%	0.005%	0.012%	0.001%	0.003%	0.00%	0.00%	0.00%	0.00%	0.00%	0.006%

Table 11-3. ST1 Mineral Resource, hybrid open-pit and underground scenario, effective date 31 July 2026. Oxide values in parts per million; TREO in per cent. TREO is the sum of La₂O₃, Ce₂O₃, Pr₆O₁₁, Nd₂O₃, Sm₂O₃, Eu₂O₃, Gd₂O₃, Tb₄O₇, Dy₂O₃ and Y₂O₃. Tonnages are in situ. Underground tonnages are net of the exclusion zone. Reported above a net smelter return cut-off of US\$92.22/t for the open-pit component and US\$141.22/t for the underground component, on the assumptions in the left-hand column of Table 11-2. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Source: MRE Table 11-17 for the hybrid total rows; supporting optimization model for the component rows. The component rows sum to 6,897 kt Indicated and 12,238 kt in total against the 6,900 kt and 12,240 kt printed in the MRE; the difference is rounding in the MRE and is immaterial. The mine schedule at Item 13 and the economic analysis at Item 19 are built on the component tonnages.

The additivity of the two components is a matter of substance rather than presentation, and it is the reason the hybrid case can be evaluated at all. It follows from the way the hybrid scenario was optimized: the underground stope shapes were generated beneath the base of the optimized pit shell, with a 20 m exclusion zone between them representing material that could not be recovered by either method. The MRE reports the hybrid scenario on that basis, and the open-pit and underground components of the supporting model sum to the hybrid total within rounding, which demonstrates the point arithmetically.

Constraint applied within the estimate — the exclusion zone

The estimate is reported net of sterilisation at the open pit to underground interface. A 20 m exclusion zone is applied within the hybrid optimization, before classification, and material within it is not reported as Mineral Resource.

Approximately 136,000 tonnes is excluded on that account, of which about 122,000 tonnes is Indicated Mineral Resource at approximately 1.14% TREO. That quantification is taken from the optimization model supporting the MRE and is not itself published in the MRE. The excluded material is set out for reference at Item 13.2.1 and reconciled at Item 11.6. No economic value is attached to it anywhere in this report.

The 20 m width is an assumption adopted in the MRE pending site-specific geotechnical data. The interval is described as an exclusion zone rather than a crown pillar because no geotechnical assessment has been carried out from which a pillar width could be determined. See Item 13.3.1.

Mineral Resources are reported exclusive of Mineral Reserves. No Mineral Reserves have been estimated for the property. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Measured Mineral Resource has been estimated.

11.6 The portion of the Mineral Resource used in this initial assessment

Initial Assessment scheduling reconciliation: The issued MRE TRS (Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghafari, P.Eng., M.A.Sc., Tetra Tech Canada Inc) reports the Hybrid Mineral Resource at 6.900 Mt of Indicated Mineral Resources and 5.341 Mt of Inferred Mineral Resources, totaling 12.240 Mt, as set out in Item 11.5.

For the sole purpose of preparing the conceptual mine schedule and economic analysis in this Initial Assessment, Agricola has used an open pit/underground component allocation supplied for the Hybrid optimization case. This allocation is an Initial Assessment scheduling input; it does not revise, replace, reclassify, or constitute a separate Mineral Resource estimate or public restatement of the issued MRE.

The component allocation reconciles to the published Hybrid Mineral Resource total within rounding. The component figures are used only to sequence material between the open-pit,

underground and stockpile-reclaim phases in Items 13 and 19. The Mineral Resource statement for the Project remains the issued MRE TRS reported in Item 11.5.

Component	Indicated (kt)	Inferred (kt)	Total (kt)
Open pit	3,979	3,329	7,308
Underground, net of the exclusion zone	2,918	2,012	4,930
Hybrid Mineral Resource, as estimated and as scheduled	6,897	5,341	12,238
Sterilised by the exclusion zone, excluded from the estimate	122	14	136
Memorandum: underground before the exclusion zone	3,040	2,026	5,066

Table 11-4. Reconciliation of the open-pit, underground and hybrid inventories. The published Hybrid Mineral Resource is reported in Item 11.5 from the issued MRE TRS. The open-pit and underground rows are the component allocation used by Agricola solely to construct the Initial Assessment mine schedule and discounted-cash-flow model. They are not a separate Mineral Resource statement and do not amend the issued MRE TRS. The component rows reconcile to the published Hybrid Mineral Resource total within rounding. The allocation assumes a 20 m interface exclusion zone consistent with the Hybrid optimization methodology described in the issued MRE TRS. Any detailed quantification of material affected by the interface exclusion zone is an Initial Assessment scheduling reconciliation only, unless confirmed in writing by the MRE Qualified Persons as an approved supporting optimization disclosure.

Of the 12.238 million tonnes scheduled, 5.341 million tonnes or 43.6% is Inferred Mineral Resource, contributing 31.8% of the contained total rare-earth oxide. That proportion is disclosed as required by 17 CFR 229.1302(d)(4)(ii)(B), and the results of the economic analysis excluding Inferred Mineral Resources are given with equal prominence at Item 19.6.4.

The open-pit Inferred Mineral Resource is of markedly lower grade than the balance of the resource, at 0.67% TREO against approximately 1.5% to 1.6% TREO for the other components. It is retained in the schedule and treated last, for the reasons set out in Item 13.4.1.

Mineral Resources are not Mineral Reserves

Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property. The use of the Mineral Resource in an economic analysis in this report does not convert any part of it to a Mineral Reserve and does not demonstrate that the property is economically viable.

11.7 Classification

The MRE distinguishes Indicated and Inferred Mineral Resources based on estimation pass and confidence in geological and grade continuity: blocks estimated within the main carbonatite domain on the first pass, at a maximum search distance of 60 m, are classified Indicated, and all other estimated blocks are classified Inferred. No Measured Mineral Resource is defined. Under subpart 1300 of Regulation S-K the classification of Mineral Resources is the responsibility of the qualified person, and the author of this report considers the classification adopted in the MRE to be appropriate to the data density and geological confidence demonstrated. The classification is drill-spacing driven rather than derived from a quantified estimation variance, which is conventional at this stage and is noted at Item 11.8.

11.7.1 Classification history and basis of the current Hybrid estimate

The first Sarfartoq ST1 Mineral Resource estimate, prepared in January 2011, was classified entirely as Inferred Mineral Resource. The bulk of the ST1 delineation drilling was subsequently completed during 2011. More limited drilling programmes completed in 2012 and 2023 were principally directed to testing extensions and were not designed as dedicated classification-upgrade programmes.

In the issued 2026 Hybrid Mineral Resource adopted in this Initial Assessment, the component allocation used for mine scheduling comprises approximately 56% Indicated Mineral Resource by tonnage overall. The open-pit component comprises approximately 54% Indicated Mineral Resource by tonnage, and the underground component comprises approximately 59% Indicated Mineral Resource by tonnage. These percentages are derived from the component allocation used in the Initial Assessment schedule and reconcile to the published Hybrid Mineral Resource total within rounding.

The MRE Qualified Person has advised that almost all the principal carbonatite body within the drilled ST1 area is classified as Indicated Mineral Resource. The remaining Inferred Mineral Resource occurs principally in lower-grade peripheral open-pit material and at the margins of the underground component, where drilling density and confidence in geological and grade continuity are lower.

This classification history provides geological context only. It does not imply that any remaining Inferred Mineral Resource will be upgraded to Indicated Mineral Resource.

Any future reclassification upgrades will depend on the results of additional drilling, geological continuity, assay and QA/QC results, density information, estimation results and the subsequent determination of the Qualified Person responsible for a future Mineral Resource estimate.

This summary is based on the memorandum dated 20 August 2026 and signed by Ronald G. Simpson, P.Geo., the Qualified Person responsible for the issued Mineral Resource Estimate. The memorandum is retained in the Project technical record.

11.8 Factors that may materially affect the Mineral Resource estimate

The MRE identifies the following areas of uncertainty that may materially affect the estimate: commodity-price assumptions, which determine the net smelter return cut-off and therefore the reported tonnage; mining engineering assumptions such as dilution and mining losses; geotechnical assumptions such as open-pit slope angles; the assumption that all required permits will be forthcoming; metallurgical recoveries; and mining and process cost assumptions, together with the ability to obtain and maintain environmental and permitting approvals and the social licence to operate. The author of this report adds two matters bearing on the estimate as used here: the fine-grained and mineralogically complex rare-earth assemblage, which remains under study and which bears on both recovery and achievable concentrate grade; and the 20 m exclusion zone, which is an assumed width pending site-specific geotechnical data and which determines the boundary between the two components of the hybrid estimate. The MRE states that no known legal, title, taxation, socio-economic, marketing or political factor materially affects the estimate, and the author is aware of none.

11.9 Qualified Person's commentary and outstanding items (Agricola)

The estimation methodology — domained interpolation of a well-sampled core database, density assignment from a large specific-gravity dataset, inverse-distance estimation validated against nearest-neighbour and ordinary kriging and by swath plots, and net smelter return reporting cut-offs derived from optimized pit and stope shells — is sound and conventional and is documented in the issued MRE TRS. The effective date is 31 July 2026, the Qualified Person responsible for the estimate is Mr Ronald G. Simpson, P.Geo., of GeoSim Services Inc., the hybrid scenario is an independently optimized case incorporating the 20 m exclusion zone, and the 64% figure is the metallurgical recovery adopted in the MRE while 60% is the payability assumed there. The author has no reason to expect the resource tonnes or grades to change materially. The following items remain outstanding and are addressed in the recommended work programme in Item 23.

- Completion of the author's own data-verification programme and site inspection (Item 9). The MRE relies on the verification work described in its Section 9; the author's independent verification is not yet complete.
- Placement on the project record of the signed hybrid optimization model and the volumetric reconciliation between the open-pit and underground components, which underpin the component split reported in Table 11-3. The MRE publishes the hybrid total but not the component breakdown, and the component figures are the basis of the mine schedule at Item 13.
- Reconciliation of the difference between the cut-off basis applied in the MRE and the cost and revenue assumptions adopted for the initial assessment, in particular the 60% payability assumed in the MRE against the 75.4% derived at Item 16.7.6, and the 700,000 tpa plant feed rate assumed in the MRE against the 1.4 Mt/a adopted at Item 13. The direction of the difference is favourable, as explained at Item 11.4, but the two bases should be brought onto a common footing at the next study stage.

- Infill drilling to upgrade the Inferred Mineral Resource scheduled in the underground component — 2.012 Mt at 1.45% TREO, being 16.4% of the scheduled tonnage — to Indicated, and to test whether the classification can be supported by a quantified estimation-variance criterion rather than by search pass alone. Targeted infill drilling in selected priority areas of the underground component and lower-confidence margins of the ST1 Mineral Resource, intended to increase drill density sufficiently to support a future resource-classification review. The classification history and the basis of the current Hybrid estimate are described at Item 11.7.1. Whether any remaining Inferred Mineral Resource is reclassified will depend on drilling results, geological and grade continuity, assay and QA/QC results, density information, estimation results and the subsequent determination of the Qualified Person responsible for a future Mineral Resource estimate.

Qualified Person Opinion 11-1 — Mineral Resource Estimates

In my opinion the Mineral Resource estimate for the ST1 zone, as set out in the technical report summary issued by GeoSim Services Inc. and Tetra Tech Canada Inc. on 16 August 2026 with an effective date of 31 July 2026, has been prepared to an appropriate standard, using conventional and defensible methods applied to an adequate drill-hole database, and is suitable for use in the initial assessment reported in this Technical Report Summary. I have reviewed that estimate and I rely upon it; responsibility for it rests with the qualified persons who prepared it.

The hybrid scenario adopted in this report was optimized as a single case, with underground stope shapes generated beneath the base of the optimized pit shell and separated from it by a 20 m exclusion zone; its open-pit and underground components are accordingly spatially exclusive and additive, and both are used in the hybrid mine plan and the economic analysis. The stand-alone underground and open-pit scenarios also reported in the MRE are alternatives over overlapping volumes and are not used here.

The Mineral Resource is reported above the net smelter return cut-offs applied in the MRE; the economic test applied in Item 19 is consistent with, and less restrictive than, those cut-offs. No Measured Mineral Resource has been estimated, and no Mineral Reserve has been estimated. The outstanding items listed in Item 11.9 do not, in my opinion, materially affect the conclusions of this report.

Cautionary Statement — initial assessment and Inferred Mineral Resources

This Initial Assessment is preliminary in nature. It includes an economic analysis that is based, in part, on Inferred Mineral Resources. Inferred Mineral Resources are considered too speculative geologically to have the economic considerations applied to them that would enable them to be categorized as Mineral Reserves, and there is no certainty that the results of this Initial Assessment will be realized. Mineral Resources that are not Mineral Reserves

do not have demonstrated economic viability. No Mineral Reserves have been estimated for the Sarfartoq ST1 Project.



Agricola
MINING CONSULTANTS

Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

11.10 Qualified Person's commentary (R. Simpson, Geosim Services Inc.)

Project Memorandum

To:	Bo Stensgaard Greenland Mines Ltd.	Date:	Aug. 20, 2026
cc:		From:	Ronald Simpson, Geosim Services Inc.
Subject:	2026 ST1 Zone MRE	Project:	Sarfartoq

Introduction

This memorandum relates to the Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, file 704-ENG.VMIN03496-01, effective 31 July 2026 and issued for use 16 August 2026.

Comments on the MRE

I hereby confirm that I am the QP responsible for the Mineral Resource Estimate of the ST1 zone of the Project. Hassan Ghaffari of Tetra Tech Canada Inc. is responsible for the Metallurgical section, the assumptions used as inputs for reasonable prospects of economic extraction, and the mining/optimization procedures.

The hybrid scenario presented in the MRE was optimized as a single case, with spatially exclusive open-pit and underground components. The underground component lies beneath an optimized open-pit shell and incorporates a 20 m interface exclusion zone representing the non-recoverable material that lies between the open pit and the underground resources.

Resource classification of the ST1 zone

The initial MRE for the ST1 Zone was released in January 2011 and was all classified as inferred. The bulk of delineation drilling was carried out later that year. The 2012 and 2023 exploration drill programs were principally aimed at testing extensions and other targets on the property and were not designed to upgrade resource classification.

The current hybrid resource model is classified as follows:

- Approximately 56% is classified as Indicated overall by tonnage.
- Approximately 54% of the open-pit component is classified as Indicated by tonnage.
- Approximately 60% of the underground component is classified as Indicated by tonnage.
- The remainder of the resource is classified as Inferred.

Almost all of the principal carbonatite body within the drilled ST1 area is classified as Indicated, with the remaining Inferred material principally occurring in lower-grade peripheral open-pit material and at lower-confidence margins of the underground component.

'Inferred resources' have a great amount of uncertainty as to their existence, and economic and legal feasibility. It cannot be assumed that all or any part of an Inferred Mineral Resource will ever be upgraded to a higher category. Any future classification change remains subject to additional drilling, geological and grade-continuity interpretation, QA/QC and density information, estimation results and the determination of the responsible QP in any future MRE.

Dated August 20, 2026



Ronald G. Simpson, P.Geol.

Ronald G. Simpson, P.Geol.

ITEM 12 — MINERAL RESERVE ESTIMATES



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

Summary

- No Mineral Reserve has been estimated or declared for the Sarfartoq ST1 Project.
- A Mineral Reserve may be estimated only based on a pre-feasibility or feasibility study, which has not been undertaken.
- The economic analysis in Item 19 is founded on Mineral Resources, including Inferred Mineral Resources, and accordingly does not demonstrate economic viability.

12.1 Mineral Reserve statement

No Mineral Reserve has been estimated, and none is declared, for the Sarfartoq ST1 Project as at the effective date of this report. This Technical Report Summary documents an initial assessment under § 229.1302(d). An initial assessment evaluates the economic potential of Mineral Resources and is not a basis on which a Mineral Reserve may be established.

Mineral Reserve statement

As at the effective date of this report (31 July 2026) the Sarfartoq ST1 Project has no Mineral Reserves. The capital and operating cost estimates in Item 18 and the economic analysis in Item 19 are based on Mineral Resources, including Inferred Mineral Resources, and not on Mineral Reserves.

12.2 Basis for the absence of Mineral Reserves

This report is an Initial Assessment within the meaning of 17 CFR 229.1302(d). It is preliminary in nature, its economic analysis includes Inferred Mineral Resources, and it does not constitute a pre-feasibility or feasibility study or apply the full set of modifying factors. No Mineral Reserve has been estimated for the property, and no Mineral Resource has been upgraded to a Mineral Reserve.

The modifying factors that would be applied in a pre-feasibility or feasibility study, and which have not been applied at the level required to estimate a Mineral Reserve, comprise the mining, processing, metallurgical, infrastructure, economic, marketing, legal, environmental, social and governmental factors. Inferred Mineral Resources, which contribute approximately 43.6% of the tonnage and approximately 31.8% of the contained TREO scheduled in the initial assessment, are too speculative geologically to be applied in the estimation of a Mineral Reserve and cannot be upgraded to Mineral Reserves by economic study alone.

12.2.1 Resource-to-ROM mine capture

The production schedule that underpins the mining methods in Item 13 and the economic analysis in Item 19 is derived from the ST1 Mineral Resource reported in Item 11 by applying a resource-to-ROM mine-capture factor. The schedule draws on 3.979 Mt of open-pit Indicated, 3.329 Mt of open-pit Inferred, 2.918 Mt of underground Indicated and 2.012 Mt of underground Inferred Mineral Resource, being 100.0% of each of the four components and 12.238 Mt in situ in total, being 100% of the ST1 Mineral Resource. The open-pit Inferred Mineral Resource is stockpiled during the open-pit phase and reclaimed to the mill last (Item 13.4.1). Applying

mining recovery and dilution, 12.207 Mt is delivered to the mill. Capture is measured against a Mineral Resource that is itself reported net of the 20 m exclusion zone at the open pit to underground interface (Item 13.5). The capture factor reflects a mining recovery of 95 per cent and dilution of 5 per cent at zero grade in delivering resource material to the run-of-mine feed.

The mine-capture factor is a scheduling assumption within an initial assessment. It is not, and must not be represented as, a conversion of Mineral Resources to Mineral Reserves. The term “capture” is used deliberately in this report to avoid any implication that a Mineral Reserve has been estimated.

12.2.2 Dependence on the Mineral Resource estimate

Any future Mineral Reserve would depend not only on the completion of a pre-feasibility study with the modifying factors applied, but also on a Mineral Resource estimate confirmed under subpart 1300 of Regulation S-K and on the classification of sufficient Measured and/or Indicated Mineral Resource to support the proposed production schedule. At present approximately 43.6% of the scheduled tonnage is Inferred Mineral Resource, of which 27.2 percentage points is open-pit Inferred Mineral Resource and 16.4 percentage points is underground, which could not be included in any Mineral Reserve.

12.3 Pathway to Mineral Reserves

Conversion of part or all of the Mineral Resource to Mineral Reserves would require, as future steps: completion of the data-verification programme and confirmation of the Mineral Resource; infill drilling to upgrade the Inferred component within the pit shell to Indicated; locked-cycle and pilot-scale metallurgical testing to confirm recovery and concentrate specification; geotechnical and hydrogeological work to confirm pit slope design; engineering and cost definition to at least AACE Class 3; progress on permitting and the grant of an Exploitation Licence; and completion of at least a pre-feasibility study applying all modifying factors to Measured and/or Indicated Mineral Resources. The recommended work programme is set out in Item 23.

Qualified Person Opinion 12-1 — Mineral Reserves

In my opinion no Mineral Reserve can be, or has been, declared for the Sarfartoq ST1 Project as at the effective date of this report.

The property is at the initial assessment stage; its economic analysis relies in part on Inferred Mineral Resources and has not been advanced to pre-feasibility or feasibility level. The estimation of any Mineral Reserve would require a pre-feasibility or feasibility study applying all relevant modifying factors to Measured and/or Indicated Mineral Resources. References in this report to a resource-to-ROM mine-capture factor are scheduling assumptions appropriate to an initial assessment and do not represent, and must not be read as, the conversion of Mineral Resources to Mineral Reserves.

Cautionary statement — initial assessment and Inferred Mineral Resources



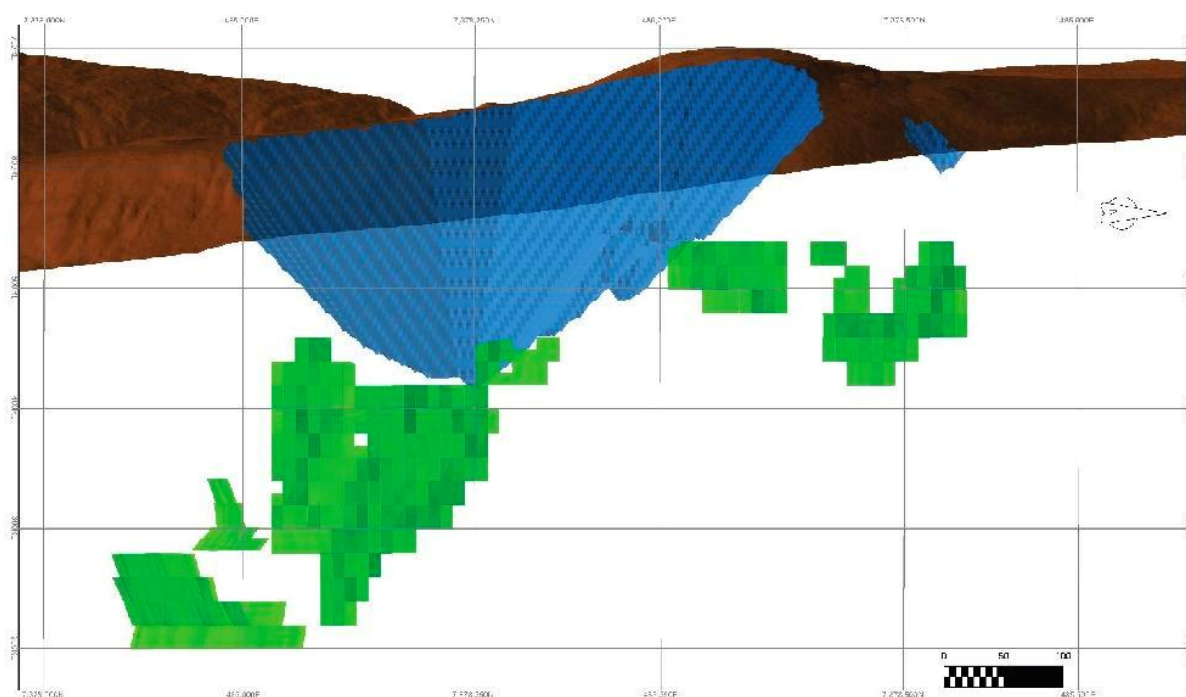
Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

This Initial Assessment is preliminary in nature. It includes an economic analysis that is based, in part, on Inferred Mineral Resources. Inferred Mineral Resources are considered too speculative geologically to have the economic considerations applied to them that would enable them to be categorized as Mineral Reserves, and there is no certainty that the results of this Initial Assessment will be realized. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the Sarfartoq ST1 Project.

ITEM 13 — MINING METHODS

Summary

- A hybrid mine plan: a conventional truck-and-shovel open pit on the ST1 zone, followed by an underground long-hole stoping operation on the volume beneath the base of the pit.
- A nine-year mine life at a nominal 1.4 Mtpa, delivering 12.207 Mt of mill feed at an average delivered head grade of 1.2591% TREO — from 7.308 Mt of open-pit and 4.930 Mt of underground Mineral Resource in situ, being 7.290 Mt and 4.918 Mt as delivered to the mill after the resource-to-ROM mine-capture factor (Table 13-1).
- Every tonne scheduled is drawn from the ST1 Mineral Resource reported in Item 11, in its spatially exclusive open-pit and underground components. No conceptual material and no exploration target is scheduled.
- Mill feed is derived from the Mineral Resource through a resource-to-ROM mine-capture factor. It does not represent a converted Mineral Reserve.
- An isometric long section looking northwest of the deposit is shown below



13.1 Mining strategy and overview

The property is evaluated on a hybrid mine plan that delivers a nominal 1,400,000 t/a of run-of-mine feed to the concentrator over nine years, for a total of 12.207 Mt of mill feed at an

average delivered head grade of 1.2591% TREO. An open pit operates in Years 1 to 4 and delivers 3.97 Mt at 1.50% TREO; an underground long-hole stoping operation is developed from Year 1, takes over the mill feed during Year 4 and runs to Year 7, delivering 4.918 Mt at 1.55% TREO. Ramp-up is 75% of nameplate in Year 1, with full rate from Year 2; Year 7 is a part-year at 0.99 Mt at which point the scheduled portion of the ST1 Mineral Resource is exhausted.

Open-pit mining is conventional truck-and-shovel practice — drill, blast, load and haul on 10 m benches with hydraulic excavators and rigid-frame haul trucks — with ore and waste mined selectively under grade control. Underground mining is by longitudinal long-hole open stoping accessed by a decline portalled from the pit wall, with sub-level development on nominal 25 m intervals and stopes backfilled with cemented rock fill. Open-pit mining is assumed to be undertaken by contract, with the mining fleet capital recovered through the contract mining rate rather than carried as direct capital (Item 18); underground development capital of US\$138 M is carried explicitly in Years 1 to 3. Pre-production stripping is carried in the initial capital estimate.

13.2 Classification status of the material scheduled

All material scheduled in this mine plan is estimated Mineral Resource. No exploration target, no conceptual inventory and no unclassified material is scheduled or valued anywhere in this report.

Source	Classification	Tonnes (kt)	Grade TREO (%)	Scheduled
ST1 open pit	Indicated	3,979	1.57	Years 1 to 4
ST1 underground	Indicated	2,918	1.64	Years 4 to 7
ST1 underground	Inferred	2,012	1.45	Years 4 to 7
ST1 open pit	Inferred	3,329	0.67	Years 7 to 9, from stockpile
Total scheduled		12,238	1.32	

Table 13-1. Classification of the material scheduled, in situ before mining recovery and dilution. Underground tonnages are net of the 20 m exclusion zone at the open pit to underground interface. The Mineral Resource components are spatially exclusive and additive, and the hybrid total is arithmetically the sum of its open-pit and underground components.

Of the total scheduled tonnage, 5.341 million tonnes, being 43.6%, is Inferred Mineral Resource, and that material contributes 31.8% of the contained total rare-earth oxide. Of the 43.6%, 27.2 percentage points is open-pit Inferred Mineral Resource and 16.4 percentage points is underground. The proportion is disclosed here, in the Executive Summary and in Item 19.1 as required by 17 CFR 229.1302(d)(4)(ii)(B).

13.2.1 Mineral Resource sterilized by the exclusion zone

The 20 m exclusion zone described at Item 13.3 is applied inside the Mineral Resource estimate. The material within it is excluded from the estimate and is set out below for reference only.

Class	Tonnes (kt)	Grade (% TREO)	Status
Underground Indicated	122	≈1.14	Excluded Mineral Resource — not reported, not scheduled
Underground Inferred	14	not stated	Excluded Mineral Resource — not reported, not scheduled
Total sterilised	136		

Table 13-1a. Mineral Resource sterilised by the exclusion zone, for reference. Derived from the difference between the hybrid optimization tables before and after the 20 m exclusion zone was applied. A technical memorandum confirming the sterilised inventory, with a sensitivity at 10 m, 20 m and 30 m, is required before PFS-level work and is listed at Item 23.

Status of the sterilised material

The sterilised material is excluded Mineral Resource. It is not an exploration target, it is not a conceptual inventory, and it is not exploration information. It does not appear at Item 7.10, at Item 21.2 or in Appendix G, and no economic value of any kind is attached to it anywhere in this report. It is disclosed here, and in the reconciliation at Item 11.6, solely so that the reader can reconcile the open-pit, underground and hybrid inventories.

Consequence of scheduling Inferred Mineral Resources

Inferred Mineral Resources are considered too speculative geologically to have modifying factors applied to them that would enable them to be categorised as Mineral Reserves. Their inclusion in the mine schedule is permitted in an initial assessment and is not permitted in a preliminary feasibility study or a feasibility study. The schedule presented here is therefore not, and cannot become, the basis of a Mineral Reserve estimate unless and until the Inferred material is upgraded by further drilling. There is no certainty that it will be.

13.3 Geotechnical and design basis

No site-specific geotechnical investigation has been carried out at Sarfartoq. Pit slope angles, stope dimensions and ground-support requirements are assumed from benchmarks for comparable carbonatite-hosted operations in competent Precambrian host rock. The underground basis is set out in full below because it supplies approximately 40 per cent of life-of-mine mill feed and rests entirely on benchmark assumptions.

Mining method. The underground operation is a conceptual long hole open stoping operation. Long-hole stoping was selected because the ST1 mineralisation occurs as steeply dipping ferrocarbonatite dyke swarms of moderate true width in competent gneissic host rock, which is the geometry the method suits, and because the same geometry was used in the underground optimization supporting the Mineral Resource estimate (Item 11). Stope shapes were generated in the optimization at a 20 m stope height, a 10 m stope length and a stope width of 3 m to 10 m, with a sub-stoping factor of 0.5 and no dilution applied within the optimization itself. No alternative underground method has been evaluated, and no trade-off study between long-hole stoping, cut-and-fill and sub-level caving has been carried out.

Absence of site-specific geotechnical and stope-design work. There is no geotechnical drilling, no rock-mass characterisation, no laboratory rock-strength testing, no stability-graph or numerical stope-stability analysis, no ground-support design and no crown-pillar design for the Sarfartoq underground. The stope dimensions carried in the optimization are geometric parameters, not the output of a geotechnical design. The 20 m interval at the open pit to underground interface is described as an exclusion zone rather than a crown pillar for that reason (Item 13.3.1). This is the single largest gap in the technical basis of the mine plan and is the highest-priority item in the recommended work programme at Item 23.

Preliminary ground-support, ventilation, dewatering and development assumptions. Access is assumed by a portal and decline from surface, with development capital of US\$138 million spread over Years 1 to 3 ahead of underground start-up (Item 18.1). Ground support is assumed to comprise pattern rock bolting and mesh in development, with shotcrete where required, at levels ordinary for competent Precambrian rock; no support design has been prepared. Primary ventilation is assumed to be a conventional intake-and-return circuit with surface fans, sized for a diesel-equipped fleet, with heating of intake air required for the Arctic climate; no ventilation network model has been built. Dewatering is assumed to be modest based on continuous permafrost and low expected hydraulic conductivity, but no hydrogeological testing has been carried out in the underground horizon and permafrost degradation around the workings has not been assessed. Backfill is assumed to be required for the sub-stoping sequence but no backfill type, source or plant has been selected or costed separately; any backfill cost is taken to be inside the all-in mining rate. Each of these assumptions is preliminary and none is supported by a site-specific study.

Benchmark underground mining cost. The US\$55.00/t underground rate is an all-in benchmark rather than a quotation or Sarfartoq-specific contractor build-up. It is applied to 4.918 Mt of underground ore, giving US\$270.5 million over the life of mine. The rate has been stressed on the current fiscal schedule: at US\$65.00/t the life-of-mine underground cost is US\$319.6 million and the after-tax NPV8 falls to US\$872 million; at US\$75.00/t it is US\$368.8 million and US\$848 million. Each US\$10.00/t on the underground rate is therefore worth approximately US\$24 million of after-tax net present value. Replacing the benchmark with a designed rate remains a recommendation of this report.

Relationship between dilution, mining recovery and the grade delivered to the mill. Mining recovery is modelled at 95 per cent and dilution at 5 per cent at zero grade, applied uniformly

to both mining methods. Their combined effect is to deliver 12.207 million tonnes to the mill from 12.238 million tonnes in situ at a delivered head grade of 1.2591% TREO against an in-situ grade of 1.32% TREO: dilution adds barren tonnes and therefore lowers the delivered grade, while mining recovery removes tonnes without changing grade, and contained metal falls in proportion to mining recovery alone. The 5 per cent dilution allowance is an open-pit benchmark. Long-hole stoping commonly incurs 10 to 20 per cent dilution, so the allowance is optimistic for the underground component. The dilution rate has been re-run in full on the current fiscal schedule. At 10 per cent dilution the mill feed rises to 12.789 Mt at 1.2019% TREO, life-of-mine operating cost to US\$1,324 million and the after-tax NPV8 falls to US\$866 million; at 15 per cent the figures are 13.370 Mt at 1.1496% TREO, US\$1,384 million and US\$835 million. Contained metal is unchanged in every case because dilution is modelled at zero grade. The 5% allowance is retained as the point-case assumption for this Initial Assessment; the 10% and 15% cases are sensitivities only and do not represent revised mine-design assumptions. Establishing a site-specific dilution and mining-recovery basis is part of the underground geotechnical and mine-design work recommended at Item 23.

13.3.1 The exclusion zone at the open pit to underground interface

A 20 m exclusion zone is retained between the base of the optimised open-pit shell and the top of the underground stoping horizon. Material within that interval is excluded from the Mineral Resource estimate. It is neither open-pit ore nor underground ore, it is not scheduled, and no value is attached to it anywhere in this report.

Exclusion zone, not crown pillar

Terminology. This report follows the terminology used by Tetra Tech and describes the interval as an exclusion zone, not as a crown pillar. The distinction is deliberate and material. A crown pillar is a designed engineering element whose dimensions follow from a geotechnical assessment of the rock mass, the stope geometry and the required factor of safety. No such assessment has been carried out, and there is presently no geotechnical data from which a pillar width could be determined.

The 20 m width is therefore an assumption adopted for estimation purposes, pending site-specific geotechnical data. It should not be read as a designed pillar dimension, and the final dimension may be greater or smaller. Tetra Tech has advised that a sensitivity of the sterilised inventory at exclusion zone widths of 10 m, 20 m and 30 m will be issued in a separate technical memorandum.

Applying the exclusion zone inside the estimate rather than as a deduction from the schedule is the correct order of operations: material that cannot be mined is not classified as Mineral Resource in the first place. The consequence is that the Mineral Resource reported at Item 11 is already net of interface sterilisation, and the mine schedule at Item 13.4 draws on that reduced estimate.

The qualified person regards the introduction of the exclusion zone as a strengthening of the estimate. It supplies a defensible open pit to underground interface where the earlier estimate had none, and it does so at a cost to the economics that is small: the after-tax net present value

at 8% real falls by approximately US\$10 million, or 1.4%, and the result excluding Inferred Mineral Resources falls by approximately US\$12 million.

13.4 Mine production schedule

The mine plan is a hybrid. An open pit is developed first on the Indicated Mineral Resource. Underground mining by long-hole open stoping follows beneath the base of the optimised pit shell, separated from it by the 20 m exclusion zone described at Item 13.3. The open-pit Inferred Mineral Resource, which is of markedly lower grade, is stockpiled during the open-pit phase and reclaimed to the mill last, after underground mining is complete. Active open-pit and underground mining is scheduled from Years 1 through 7. Deferred low-grade open-pit stockpile is reclaimed and processed in Years 7 through 9. The total scheduled processing life is nine years.

The mill is scheduled at a nameplate 1.4 million tonnes per annum, being 4,000 tonnes per day at 95% availability, ramping at 75% of nameplate in the first producing year. The schedule delivers 12.207 million tonnes of run-of-mine feed over nine years.

Year	Open pit (kt)	Underground (kt)	Mill feed (kt)	Head grade (% TREO)
1	1,047	—	1,047	1.499
2	1,396	—	1,396	1.499
3	1,396	—	1,396	1.499
4	129	1,268	1,396	1.486
5	—	1,396	1,396	1.485
6	—	1,396	1,396	1.485
7	540	857	1,396	1.157
8	1,396	—	1,396	0.638
9	1,385	—	1,385	0.638
Total	7,290	4,918	12,207	1.2591

Table 13-2. Mine production schedule delivered tonnes after mining recovery and dilution. Open-pit tonnes in Years 7 to 9 are reclaimed from the low-grade stockpile, not newly mined. Underground tonnes are net of the exclusion zone.

13.4.1 Treatment of the open-pit Inferred Mineral Resource

The open-pit Inferred Mineral Resource comprises 3.329 million tonnes at 0.67% TREO. It lies within the optimised pit shell for the Indicated Mineral Resource and is mined as part of the same pit, in the same years, by the same fleet, whether it is subsequently treated.

Three treatments were considered: sending the material to a low-grade waste pile, blending it into the mill feed in the early years alongside the Indicated ore, or stockpiling it and treating it last. The third has been adopted.

Blending the material into the early years would destroy value, because the mill is capacity constrained and every tonne of 0.67% TREO material treated in an early year displaces a tonne of ore at approximately 1.5% TREO. Deferring it to the end of the schedule captures the tonnes without that penalty. Wasting the material forgoes the tonnes altogether.

Basis for retaining and deferring the material

The open-pit Inferred Mineral Resource is retained as mill feed rather than sent to a waste pile and is treated last. The test applied to it is the incremental test, not a full-cost break-even. A full-cost break-even recovers the entire initial capital programme, but that capital is committed by the Indicated open pit whether this material is treated, and its mining and stripping cost is incurred in the open-pit phase in any event. Incremental mill feed need only clear the incremental cash cost of treating it, which on the assumptions of this report is 0.35% TREO. Material at 0.67% TREO clears that test by a factor of approximately 1.9 and clears the full-cost marginal cut-off of 0.37% TREO by a factor of approximately 1.8. Reporting the material as a Mineral Resource and scheduling it are accordingly consistent: the reasonable-prospects determination underpinning the Mineral Resource statement and the economic test applied in Item 19 are applied to the same material on a consistent basis.

Because the material is mined during the open-pit phase in any event, total pit material movement is unchanged by this decision. What changes is its classification: 3.329 million tonnes moves from the waste line to the ore line. Waste mined over the life of the pit is accordingly 2.768 million tonnes and the strip ratio on total open-pit ore is 0.38 to 1. Open-pit mining and stripping costs are charged in the years in which they are incurred and are not charged again when the stockpile is reclaimed; the reclaimed material carries a reclaim and rehandle charge of US\$1.50 per tonne in place of a mining charge.

Outstanding items — stockpile and fleet

Outstanding items. The stockpile reaches a maximum of 3.329 million tonnes and stands for approximately five years; pad capacity, drainage and any grade degradation or oxidation over that period require confirmation. Open-pit ore mining rises to approximately 2.6 million tonnes per annum in Years 2 and 3 once the Inferred material is retained as ore rather than dumped, and fleet capacity requires confirmation on that basis. The rehandle rate of US\$1.50 per tonne is a benchmark figure and has not been quoted.

13.5 Mining recovery, dilution and resource-to-ROM capture

Mining recovery of 95% and mining dilution of 5% at zero grade are applied on the production schedule to tonnes and to grade.

The schedule consumes 100% of each of the four components of the Mineral Resource, and control checks in the financial model confirm that no category is over-drawn. That statement requires careful reading, because the Mineral Resource against which capture is measured has itself been reduced for sterilisation at the open pit to underground interface.

What 100% capture means in this report

Sterilisation at the interface is allowed for upstream, inside the Mineral Resource estimate and before classification, through the 20 m exclusion zone described at Item 13.3. Approximately 136,000 tonnes, of which about 122,000 tonnes is Indicated Mineral Resource at approximately 1.14% TREO, is excluded from the estimate on that account and is not reported as Mineral Resource, not scheduled and not valued. Capture of 100% is therefore capture of a Mineral Resource that has already been reduced for the principal source of geotechnical sterilisation and is not the same statement as capture of an unconstrained inventory.

Sterilisation at the open pit to underground interface is accounted for inside the Mineral Resource estimate through the 20 m exclusion zone, as described above, so that material is not reported as Mineral Resource and no further deduction from the schedule is required on that account. No allowance is made for pillars or other geotechnical losses within the underground stopping horizon; establishing whether such an allowance is required is part of the underground geotechnical and mine-design work recommended at Item 23.

It remains accurate as to everything else, and the qualified person records the point without qualification. No allowance is made for sill pillars or rib pillars within the stopping horizon, for sterilisation around underground development, for geotechnical loss within the stopping blocks, or for unplanned ore loss beyond the 95% mining recovery factor. Mine design work at the next study phase should be expected to reduce capture below 100% for those reasons, and the qualified person regards that as more likely than not.

13.6 Mine equipment and personnel

Open-pit mining is assumed to be undertaken on a contract basis at a unit cost of US\$6.00 per tonne of run-of-mine feed, which is inclusive of drilling, blasting, loading, hauling of ore and waste at the scheduled strip ratio, grade control, and mine maintenance and supervision. On this basis no open-pit mining fleet capital is carried in the direct capital estimate. The fleet required is of the order of 90–120 t hydraulic excavators with matched rigid-frame haul trucks, supported by track dozers, graders, water carts and production drills, sized for a peak total material movement of approximately 3.5 Mt per annum. Underground mining is carried at a benchmark unit cost of US\$55.00 per tonne of run-of-mine feed, inclusive of development, production drilling, blasting, mucking, haulage to surface, backfill, ventilation, ground support and underground services; the underground fleet is assumed to be owner operated and is carried

within the US\$138 M of underground development capital. Mine operating and technical personnel are assumed to be accommodated in the permanent camp described in Item 15.

13.7 Qualified Person's commentary

The qualified person records the following observations on the mine plan.

Inferred Mineral Resources comprise 43.6% of the scheduled tonnage and 31.8% of the contained total rare-earth oxide. That material is not confined to the underground component. Of the 43.6%, 27.2 percentage points is the open-pit Inferred Mineral Resource that is stockpiled during the open-pit phase and reclaimed to the mill last, and 16.4 percentage points is underground material scheduled alongside the underground Indicated Mineral Resource. The two components differ markedly in grade, at 0.67% and 1.45% TREO respectively, and they are scheduled at different times. The proportion is disclosed as required by 17 CFR 229.1302(d)(4)(ii)(B) and the results of the economic analysis excluding Inferred Mineral Resources are given with equal prominence at Item 19.6.4.

Sterilisation at the open pit to underground interface is allowed for within the Mineral Resource estimate through the exclusion zone described at Item 13.3, and the sterilised material is excluded from the estimate rather than scheduled. Sill pillars and rib pillars within the stoping horizon remain unallowed for, as does ore loss beyond the 95% mining recovery factor.

Mining dilution of 5% at zero grade is applied uniformly and is not differentiated by mining method. Long-hole open stoping typically incurs 10% to 20%. Underground material is 4.918 million tonnes of the 12.207 million tonnes delivered. The assumption is optimistic for the underground component and is identified among the limitations of the economic analysis at Item 19.9.

There is no geotechnical, stope-design or ground-support basis for the underground mining rate of US\$55.00 per tonne, which is a benchmark contract rate. Replacing it with a designed rate is a recommendation of this report.

ITEM 14 — PROCESSING AND RECOVERY METHODS

Processing and Recovery Methods Summary

- A flotation flowsheet produces a clean mixed rare earth oxide concentrate for export; no on-site separation.
- Recovery is applied once; the mine plan sits at the conservative end of the test envelope.
- The flowsheet is supported by bench-scale test-work, pending pilot confirmation.

The proposed processing plant has been designed to produce a saleable mixed rare earth flotation concentrate for export to an established third-party separation facility, with no on-site hydrometallurgical processing or solvent extraction. Metallurgical testwork undertaken by SGS Canada has demonstrated that conventional flotation provides the most effective beneficiation method for the ST1 mineralisation, while alternative upgrading techniques such as ore sorting and magnetic separation were found to be ineffective. The conceptual flowsheet comprises crushing, fine grinding, flotation, concentrate dewatering and bagging, with flotation tailings directed to a dedicated tailings storage facility.

The processing design is based on a nominal throughput of 1,400,000 tonnes of run-of-mine ore per annum (1.4 Mtpa) and adopts a single metallurgical recovery methodology consistent with the demonstrated flotation performance. The adopted economic model assumes a saleable second-cleaner concentrate grade of approximately 8.25% TREO, derived from the life-of-mine feed grade of 1.2591% TREO, the adopted recovery of 63.6% and the concentrate mass pull of 9.7%. The adopted recovery of 63.6% corresponds to the neodymium recovery achieved on the F105 Master Composite; the cerium-proxy result on the same composite was 62.2%. Recovery is applied once, in the revenue calculation, and is not applied a second time anywhere in the model. The recovery sensitivity range carried throughout this report is 55% to 70%, applied consistently in Items 10, 14, 19 and Appendix A.

The Qualified Person considers the proposed processing route to be technically appropriate for an Initial Assessment and supported by the available bench-scale metallurgical testwork. However, the process design remains conceptual and requires confirmation through locked-cycle flotation testing, pilot-scale operation, process-water evaluation, optimization of reagent consumption, concentrate specification verification, and further engineering studies before it can support Pre-Feasibility or Feasibility Study level design. These studies will improve confidence in process performance, operating costs and concentrate marketability while reducing technical risk as the Project advances toward development.

14.1 Process selection and basis

The Sarfartoq ST1 process design produces a saleable mixed rare earth oxide (REO) flotation concentrate for export to a third-party separator; no on-site hydrometallurgical separation is included. The selection of flotation as the sole beneficiation route, and the concentrate-export configuration, follow directly from the metallurgical test work (Item 10): ore sorting and wet high-intensity magnetic separation were tested and did not provide effective or consistent upgrading, whereas flotation produced a saleable concentrate. The design throughput is 1,400,000 t/yr (1.4 Mtpa) of run-of-mine (ROM) ore (Year 1 at 75% ramp-up) at a delivered life-of-mine head grade of 1.2591% TREO — 1.50% from the open pit in Years 1 to 4 and 1.47% from the underground in Years 4 to 7. The flowsheet described here is a conceptual design supporting an Initial Assessment; it is based on bench-scale, open-circuit batch test work and has not been confirmed by locked-cycle or pilot-scale work.

14.2 Process flowsheet

The flowsheet comprises crushing and fine grinding, high-intensity conditioning, rougher and rougher-scavenger flotation, two stages of cleaner flotation, and concentrate dewatering and drying, with flotation tailings routed to a tailings/residue storage facility. The final concentrate is exported for downstream separation. The principal stages are summarized below.

Stream	Tonnes	TREO grade
ROM mill feed delivered, life of mine	12,207,405	1.2591%
Final concentrate, life of mine	1,184,118	8.25%
Flotation tailings, life of mine	11,023,287	0.508%
Mass pull to concentrate	9.7%	
Metallurgical recovery to concentrate	63.6%	

Table 14-1. Sarfartoq ST1 process flowsheet — principal stages. Source: QP design from SGS test work (Item 10).

Sarfartoq Nd-Pr REE Project — Process Flowsheet: Mining to Port Loading

Initial Assessment basis (S-K 1300 Item 14) — common process plant; open-pit and underground feed | Agricola Mining Consultants

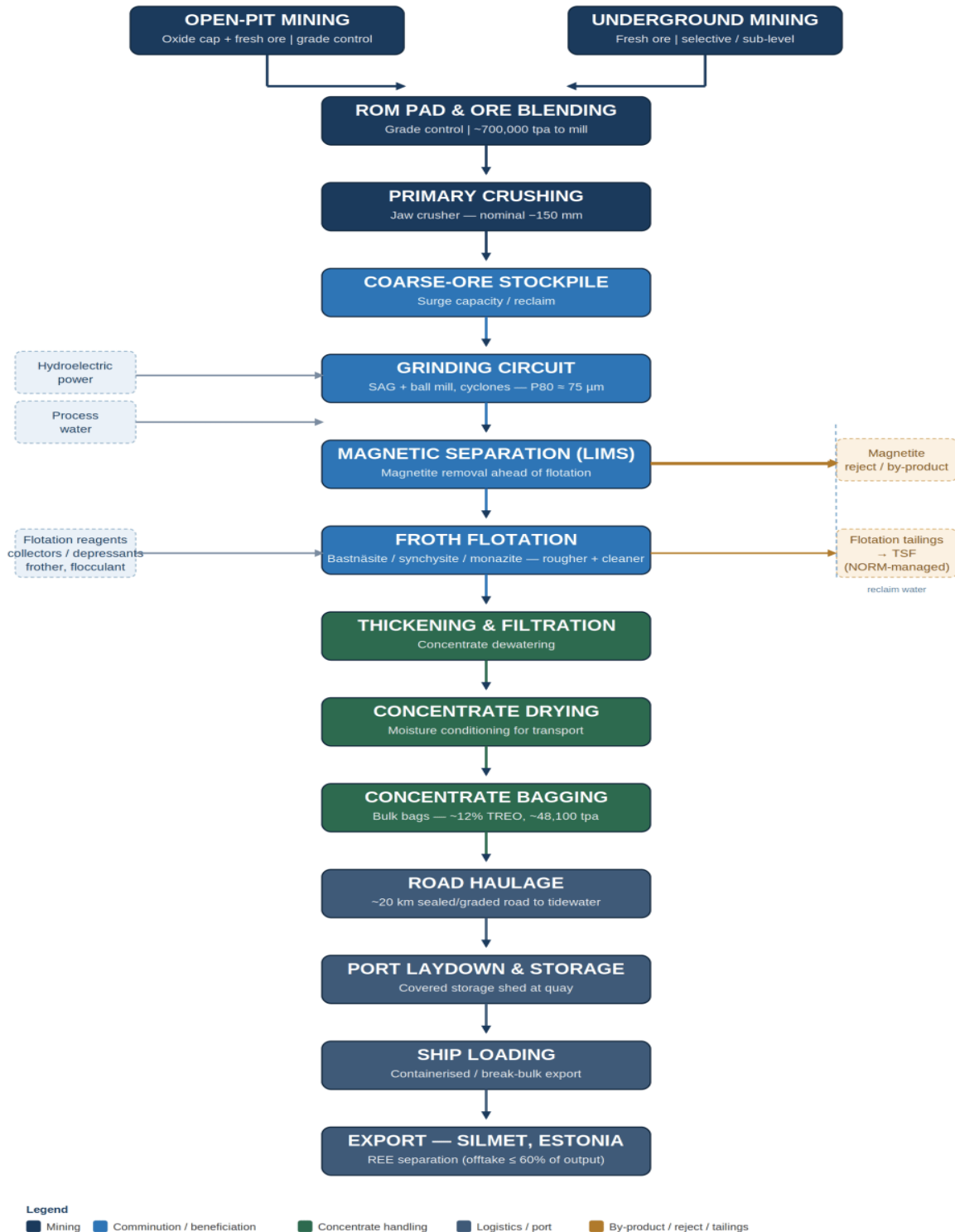


Figure 14-1. Conceptual process flowsheet adopted for the Initial Assessment.

14.3 Comminution and grind

The ore is moderately soft to moderately hard, with Bond ball-mill work indices of 12.8–16.1 kWh/t. The test work established that a fine primary grind is essential to liberation and flotation performance: a target of P100 $\approx$ 38 μ m (P80 $\approx$ 27 μ m) was adopted, achieved by stage grinding to limit slimes generation. This is a fine and energy-intensive grind; grinding power is a significant component of operating cost (Item 18) and of plant energy demand (Item 15).

14.4 Flotation and reagents

Beneficiation is by froth flotation of the rare-earth carbonate and fluorocarbonate minerals. Conditioning is at high pulp density ($\approx$ 50% solids), high shear and elevated temperature (70°C), at a conditioning pH of approximately 9. The collector is a mixture of PAM200 and AM810 (1:3); the depressant/dispersant suite is lignin sulphonate (F220) and sodium fluorosilicate, with citric acid available for apatite depression. Rougher and rougher-scavenger concentrates are combined and upgraded through two cleaner stages to the final (2nd-cleaner) concentrate. The indicative reagent suite is summarized below in Table 14-2.

Reagent	Role	Indicative dosage (g/t ROM)
PAM200 / AM810 (1:3 mix)	Primary collector	$\approx$ 250–275
Lignin sulphonate (F220)	Depressant / dispersant	$\approx$ 3,000–3,600
Sodium fluorosilicate (Na₂SiF₆)	Depressant	$\approx$ 500–650
Soda ash (Na₂CO₃)	pH modifier ($\approx$ 9)	$\approx$ 3,000–4,400
Citric acid	Apatite depressant (as required)	$\approx$ 100
Pine oil / defoamer	Frother / defoamer	minor

Table 14-2. Indicative flotation reagent suite. Source: SGS Lakefield Project 19446-02A (Item 10). Final grade is sensitive to collector and depressant dosages.

14.5 Concentrate handling and the export route

The final flotation concentrate is thickened, filtered, dried and bagged for export. The design adopts a concentrate-export configuration: the mixed REO concentrate is shipped to the offtake (Neo Performance Materials / NPM Silmet OÜ, Estonia) for downstream cracking, leaching and separation into individual oxides. No hydrometallurgical separation, solvent extraction or refining is undertaken on site. The project's realized revenue is therefore the in-concentrate basket value adjusted for payability (Items 16 and 19), and the project does not carry the capital cost, operating cost or environmental burden of a separation plant.

14.6 Recovery and concentrate-grade design basis

The single metallurgical recovery adopted for the mine plan is 63.6% of contained TREO to the saleable second-cleaner concentrate. The adopted recovery is 63.6%, corresponding to the neodymium recovery achieved on the F105 Master Composite. Neodymium is a principal value driver in the economic basket. The cerium-proxy result on the same composite was 62.2% and is identified as such wherever it appears; it is not averaged with the neodymium result and is not the adopted figure. Recovery is applied once, in the revenue calculation, and is not applied a second time anywhere in the model.

Design parameter	Lower	Adopted (mine plan)	Upper
Metallurgical recovery — adopted	55%	63.6%	70%
Measured on F105 — Ce proxy / Nd	—	62.2% / 63.6%	—
Mass pull to final concentrate	≈9.7%	≈9.7%	≈9.7%
Concentrate grade (TREO, at 1.2591% ROM)	7.14%	8.25%	9.09%
Upgrade ratio (concentrate / ROM)	5.7×	6.6×	7.2×

Table 14-3. Recovery and concentrate-grade design basis. Concentrate grade = ROM grade × (recovery ÷ mass pull), evaluated at the delivered life-of-mine head grade of 1.2591% TREO for the hybrid schedule. The adopted recovery of 63.6% is the neodymium result from the F105 Master Composite, adopted because neodymium is a principal value driver in the economic basket. Reconciliation: the F105 test produced a 10.7% TREO concentrate from a 1.77% TREO composite at 9.7% mass pull, an upgrade ratio of 6.05× and a cerium-proxy recovery of 62.2%, with 63.6% measured on neodymium. Carrying the same 9.7% mass pull and 63.6% recovery to the life-of-mine delivered head grade of 1.2591% TREO gives a concentrate grade of 8.25% TREO and 97,753 tonnes of contained TREO in 1,184,118 tonnes of concentrate, which are the figures used in the financial model at Item 19. The lower life-of-mine concentrate grade relative to the test result follows from the lower head grade of the scheduled feed, not from any change in metallurgical performance. No further reconciliation of the recovery basis is outstanding.

Recovery is applied once

Consistent with Item 10, recovery is applied as a single metallurgical recovery to the saleable concentrate — it is not a concentration ratio multiplied by a further recovery factor. In flotation, mass pull multiplied by upgrade ratio is itself the recovery (at the life-of-mine basis, 9.7% mass pull ×

6.55× upgrade = 63.6% recovery). The economic analysis applies the 63.6% recovery once, at the concentration stage, and applies payability separately and after it.

14.7 Annualized mass balance

The life-of-mine mass balance at the adopted recovery of 63.6% and the adopted concentrate mass pull of 9.7% is set out below. It is computed on the life-of-mine delivered feed and the life-of-mine delivered head grade scheduled in Item 13, not on a steady-state year, and it reconciles exactly to the physicals carried in the economic analysis at Item 19.

Stream	Tonnes	TREO grade	Contained TREO (t)
ROM mill feed delivered, life of mine	12,207,405	1.2591%	153,703
Final concentrate, life of mine	1,184,118	8.25%	97,753
Flotation tailings, life of mine	11,023,287	0.508%	55,950
Mass pull to concentrate	9.7%		
Metallurgical recovery to concentrate	63.6%		

Table 14-4. Life-of-mine mass balance at the adopted recovery of 63.6% and mass pull of 9.7%. Feed tonnes and grade are the delivered life-of-mine figures scheduled for the hybrid plan in Item 13, after mining recovery and dilution. Concentrate grade is the life-of-mine average and follows from feed grade × recovery ÷ mass pull. At nameplate throughput of 1,396,500 t/a the corresponding annual figures are 135,460 t of concentrate and 1,261,040 t of tailings. Contained TREO figures are rounded and may not sum exactly.

14.8 Tailings, deleterious elements and NORM

Flotation tailings are produced at 1,261,040 t/a at nameplate throughput and total 11.023 Mt over the life of mine (Table 14-4). They are carbonate-dominated and are routed to a tailings and residue storage facility (Items 15 and 17). Thorium, as naturally occurring radioactive material (NORM), is hosted in the rare-earth and accessory minerals and reports in part to the tailings; its characterization, containment and management are addressed in Item 17.

14.9 Throughput, availability and design maturity

Design throughput is 1,400,000 t/yr (1.4 Mtpa) of ROM ore at approximately 95% plant availability. Process heat for 70°C flotation conditioning, together with building heat, is a significant energy demand in the Arctic setting and should be carried explicitly in the energy and operating-cost basis (Items 15 and 18). The flowsheet is defined at a conceptual (Initial Assessment) level only.

14.10 *Qualified Person's comment and limitations*

Qualified Person's Opinion

The selected flowsheet — fine grinding followed by flotation to a mixed REO concentrate for export — is technically reasonable and is supported by the test work. It rests, however, on bench-scale, open-circuit batch results, and the recovery and concentrate grade adopted here are preliminary design targets, not guarantees.

Before the process design can support a higher level of study, the QP recommends: a locked-cycle flotation test on a grade-representative ST1 mill-feed composite (at $\approx 1.5\%$ TREO, not the high-grade test composite); pilot-scale confirmation; apatite-rejection and process-water testing; confirmation of the concentrate specification, including thorium, against the offtake terms; renewed hydrometallurgical (cracking and leaching) test work to define the downstream route; and a comminution-energy and reagent-consumption study to firm the operating-cost and energy basis. The single-recovery basis in Item 14.6 is reflected in the economic analysis (Item 19).

14.11 *References*

SGS Canada Inc. (Lakefield), 2024–2026. Beneficiation test work on Sarfartoq drill-core samples, Project 19446-02A (flotation flowsheet, recovery and concentrate grade; tests F37 and F105).

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update, Item 15 (Mineral Processing and Metallurgical Testing).

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 metallurgical file note (grade and recovery basis; Item 10) and rebuilt discounted cash-flow model (mass balance and recovery inputs; Item 19).

ITEM 15 — INFRASTRUCTURE

Infrastructure Summary

- Only an exploration camp and drill fleet has existed during the exploration phase; all production infrastructure is to be built.
- Power and energy (including process heat), tailings storage and the export port are the key swing factors.
- The infrastructure scope is a major component of the capital cost estimate (Item 18).

The Sarfartoq ST1 Project benefits from favorable regional infrastructure for a remote Arctic development, including proximity to Kangerlussuaq International Airport, access to deep-water fjord shipping, and an established exploration camp with operational drilling equipment. These existing facilities provide a sound foundation for future project development; however, all production infrastructure required for mining and processing remains at the conceptual planning stage and will require detailed engineering, permitting and construction prior to commencement of operations.

The proposed infrastructure includes site access roads, power generation, water supply, the processing plant, tailings and waste rock storage facilities, fuel and reagent storage, concentrate handling and export facilities, accommodation, communications and supporting services. Attention will be required to optimize the power and process heat supply, develop an appropriate tailings management strategy for Arctic conditions, establish reliable year-round logistics, and design facilities suitable for construction and operation within a continuous permafrost environment.

The Qualified Person considers the infrastructure requirements to be typical for a project of this scale and location and identifies no fundamental impediments to development. The principal infrastructure risks relate to selection of the preferred power supply, transportation and export route, tailings storage methodology, site access and overall capital cost. These matters will require detailed engineering studies and cost optimization during the Pre-Feasibility Study and represent the major infrastructure workstreams necessary to advance the Project toward development.

15.1 Basis and overview

This section describes the infrastructure required to develop and operate the Sarfartoq ST1 project, and its status. The regional setting, access, climate and local resources are described in

Item 4 and are not repeated here. At present the only material infrastructure on site is an exploration camp and a drill fleet; all production infrastructure — power, water, process plant, tailings and waste storage, site access and a product-export solution — remains to be designed, permitted and constructed. The infrastructure basis is conceptual, consistent with an Initial Assessment, and forms a major component of the capital cost estimate (Item 18).

15.2 Infrastructure requirements — summary

Element	Status	Basis / to be defined
Site access	Air / helicopter from Kangerlussuaq; no road	Access road/track route and standard; on-site haul roads
Power	None (camp gensets only)	Diesel generation ± hydro/wind; capacity and energy basis (§15.4)
Process heat	—	70°C flotation + building heat — a major continuous Arctic thermal load
Water	Abundant local (lakes / meltwater)	Source, allocation, winter storage and treatment
Process plant	None	Site, layout, permafrost foundations (candidate sites overflowed)
Tailings storage	None	Method (dry-stack vs wet), location, capacity; NORM management
Waste rock	None	Location and capacity
Product export / port	Fjord sealift or Sisimiut port	Port solution and shipping season
Fuel & reagents (in-bound)	Via Kangerlussuaq / fjord	Open-water sealift; bridging storage for the closed season
Camp / accommodation	Existing ≈25–30-person exploration camp	Operations camp size and standard (winterized)
Communications	Exploration-camp comms	Operational communications and data connectivity

Table 15-1. Infrastructure requirements and status. Source: QP, from GRML disclosures and Items 4 and 14.

15.3 Site access and roads

The project is accessed from Kangerlussuaq, approximately 60 km to the north-east, which has a long, all-weather runway and is a key domestic and logistics hub with scheduled international services.

15.4 Power supply and energy demand

There is no electricity grid serving the project; the settlements of Kangerlussuaq and Sisimiut have their own, non-connectable supplies, so power would be generated on site. The mine plan is diesel generation, with the potential for a hydroelectric and/or wind component given the region's resources; a hybrid wind / hydro-diesel configuration is identified as a study opportunity that could reduce operating cost and emissions (Item 21). The diesel-versus-hybrid trade-off materially affects both operating cost and the emissions profile (Items 17 and 18). Two features make the energy basis unusually important at Sarfartoq: first, the flowsheet requires process heat — flotation conditioning at 70°C, together with building heat across an Arctic site, is a significant and continuous thermal load (Item 14); and second, the fine primary grind (P80 $\approx$ 27 μ m; Bond ball-mill work indices 12.8–16.1 kWh/t) makes comminution a significant electrical load.

15.5 Water supply and management

Process and potable water are expected to be readily available from local lakes, rivers and glacial meltwater (Item 4), subject to strong seasonality and winter freezing. Water management must address continuous permafrost, seasonal meltwater flooding, and the need to store or treat water for year-round supply. Contact water, tailings supernatant and any site discharge will require management and, where necessary, treatment to meet Greenland environmental requirements (Item 17).

15.6 Process plant site and ancillary facilities

The process plant (crushing, fine grinding, flotation, and concentrate dewatering and drying; Item 14) and its ancillary facilities — workshops, warehousing, fuel storage, reagent storage and handling, an explosives magazine, and administration buildings — require a prepared site with permafrost-appropriate foundations. Candidate plant and infrastructure sites were overflown and inspected during the 2026 site visit but have not been selected. The carbonatite core itself lies within the Arnangarnup Qoorua protected area and is not available for infrastructure (Item 3).

15.7 Tailings and waste management

Flotation tailings are produced at 1,261,040 t/a at nameplate throughput and total 11.023 Mt over the life of mine (Item 14.7). They are carbonate-dominated and carry naturally occurring radioactive material (thorium; Items 6 and 14). They must be stored in an engineered tailings and residue storage facility designed for continuous permafrost and the Arctic climate; a filtered (dry-stack) option is commonly favored in such settings to manage water and freeze-thaw, but the storage method has not been selected. Waste rock and overburden from open-pit mining total 2.7685 Mt over the open-pit life, taken from the mine production schedule in Item

13, and require separate engineered storage. Both facilities are central to the environmental, permitting and closure work (Item 17) and to the financial-security requirements under any exploitation Licence (Item 3). Because the waste tonnage is modest relative to the tailings tonnage, the tailings facility governs the storage, closure and financial-security requirement.

15.8 Product export, inbound logistics and port

The project produces 135,460 t/a of mixed REO concentrate at nameplate throughput, and 1.184 Mt over the life of mine (Table 14-4), for export to a third-party separator (Items 14 and 16). Both product export and the inbound supply of fuel, reagents and consumables depend on a marine solution: either sealift from the head of the Søndre Strømfjord near Kangerlussuaq, or use of a coastal port such as Sisimiut, with road or barge haulage to the marine point. Marine logistics are seasonal, constrained by the open water/shipping season and potential sea ice, which requires on-site storage to bridge the closed season for both product and consumables.

15.9 Accommodation, camp and communications

The project holds an established exploration camp for approximately 25–30 personnel with field-support facilities, and two diamond drill rigs in good condition, which GRML intends to re-open in 2026. An operating workforce would require expanded, winterized accommodation and messing, together with operational communications and data connectivity, on a fly-in/fly-out basis through Kangerlussuaq (Item 4).

15.10 Sufficiency and development status

Except for the exploration camp and drill fleet, none of the production infrastructure yet exists. In the QP's opinion, sufficient land of suitable character is available for the required infrastructure (Item 4), and the regional access and fjord/port system are adequate for a project of this scale; however, the on-site infrastructure must be designed, permitted, financed and constructed, and its sufficiency and cost can be confirmed only once the project studies and site selections are complete. The infrastructure scope is one of the largest components of the capital cost estimate (Item 18).

15.11 Qualified Person's comment and items to be completed

Qualified Person's Opinion

The infrastructure task at Sarfartoq is substantial but not unusual for a remote Arctic project. The established camp, drill fleet, nearby all-weather runway and deep-water fjord sealift are genuine advantages.

The defining infrastructure uncertainties — and the largest swing factors in the capital and operating cost — are the power, energy and process-heat solution (including the hybrid wind/hydro-diesel option); the tailings storage method and location; the product-export port and shipping season; and the site-access route. None is yet defined. The QP regards these as normal open items for an Initial Assessment, but they are material to Items 17 and 18 and should be advanced before the next study stage.

15.12 References

FGS / Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates, 2025. Technical Report on the Sarfartoq Project, West Greenland — 2025 Update, Item 5 (Accessibility, Climate, Infrastructure and Physiography).

Greenland Mines Ltd and Neo Performance Materials — public disclosures, May–June 2026 (on-site camp for ≈ 25 –30 personnel; two diamond drill rigs; overflight of potential infrastructure sites; Kangerlussuaq and Sisimiut logistics).

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 Initial Assessment — Item 13 (mining), Item 14 (processing and mass balance) and Item 18 (capital and operating costs).

ITEM 16 — MARKET STUDIES

Market Studies and Rare Earth Basket Price Summary

- Value is driven overwhelmingly by neodymium and praseodymium.
- A per-element oxide basket is used, from independent price sources, with a long-term-real price test.
- The product is a concentrate sold to a third-party separator under an offtake arrangement.

The Sarfartoq ST1 Project is based on the production and sale of a mixed rare earth flotation concentrate to an established third-party separation facility, with project revenue determined by the weighted basket value of the contained rare earth oxides and the commercial payability achieved under future offtake agreements. The adopted basket price has been developed using current market information from recognized industry price reporting agencies, combined with the Project's rare earth oxide distribution, to establish a reasonable basis for the Initial Assessment economic evaluation.

The economic value of the concentrate is overwhelmingly derived from the magnet rare earth elements neodymium and praseodymium, with smaller contributions from terbium and dysprosium. Although lanthanum and cerium comprise most of the total rare earth oxide content by mass, they contribute only a minor proportion of the overall basket value. Consequently, the Project's financial performance is highly sensitive to long-term neodymium and praseodymium prices, while fluctuations in the remaining rare earth oxides have comparatively limited influence on project economics.

The Qualified Person considers the adopted market assumptions to provide a reasonable basis for an Initial Assessment; however, the selected price deck reflects market conditions that remain elevated relative to long-term historical averages. For this reason, the economic analysis should be supported by sensitivity analyses using lower long-term price scenarios to demonstrate project resilience under more conservative market conditions. Continued development of concentrate marketing, offtake negotiations and independent market studies will further strengthen confidence in future revenue projections as the Project advances toward Pre-Feasibility Study.

Basis and Limitations

The market assumptions in this section, including the rare-earth oxide price deck and the concentrate payability, are the long-term real estimates adopted by the Qualified Person (QP) for the purpose of

the Initial Assessment. They are not third-party price forecasts. The QP recommends that the price deck and offtake terms be corroborated by an independent market specialist and by binding commercial agreements before any feasibility-level determination. All prices are expressed in constant July 2026 United States dollars.

16.1 Overview of product and markets

The Sarfartoq ST1 Project is planned to produce a mixed rare earth flotation concentrate for sale to third-party separation facilities, with revenue dominated by the magnet rare earths neodymium and praseodymium. Market studies have been completed by the Qualified Person using price forecasts and market data sourced from recognized independent price-reporting agencies and industry research, supplemented by public information on rare earth demand, supply, and geopolitical and regulatory trends relevant to Western rare earth supply chains.

Price assumptions for neodymium, praseodymium, terbium and dysprosium oxides are expressed in constant real United States dollars as of 31 July 2026, consistent with the effective date of this Technical Report Summary and the economic analysis in Item 19. The Qualified Person considers these assumptions reasonable for an Initial Assessment, recognizing that rare earth prices are volatile and subject to material uncertainty due to evolving clean-energy demand, technology changes, trade policies and Chinese production and export behavior.

The economic analysis uses a rare earth oxide basket price of US\$51.88/kg TREO in real Q2 2026 dollars, derived from an independent market study and price-reporting agency data for Nd-Pr-dominant concentrates. For the Initial Assessment, the Qualified Person has adopted a payability of 75.4% of contained payable value for the mixed rare earth concentrate. The base-case payability of 75.4% is derived from a fixed US\$12.74/kg contained-TREO toll. The published ladder is a model sensitivity and not evidence that the adopted payability was selected from a comparable-project range. Net realized concentrate revenue in the DCF model is approximately US\$391 million in Year 1, reaches US\$521 million in the first full production year and holds at approximately US\$516 to US\$521 million through the underground years, falling to approximately US\$402 million in Year 7 and to approximately US\$220 million in the stock-pile-reclaim years, after applying payability and excluding refining charges. The net realized price is US\$39.14/kg of contained TREO in concentrate.

16.2 Payability, contracts and market risk

Payability assumptions for the mixed rare earth concentrate are based on indicative terms and benchmark payability ranges published by independent industry sources for comparable concentrates sold into Western separation facilities; no binding off-take agreements are currently

in place for Sarfartoq ST1 product. The Qualified Person has treated payability as a key modifying factor and has tested project sensitivity to variations in payability and concentrate specifications in the economic analysis in Item 19.

The principal market risks include changes in Nd–Pr prices relative to the assumed price deck, potential discounts arising from concentrate impurities or specification differences, counterparty risk in future off-take agreements, and broader supply-chain risks associated with the development of non-Chinese rare earth separation capacity. These risks are reflected in the sensitivity analysis and are considered in the overall risk assessment and recommendations in Items 19, 21 and 23.

16.3 Rare Earth Market Context

The economic value of the Sarfartoq basket is concentrated in the magnet rare earths — neodymium and praseodymium, with terbium and dysprosium as high-value heavy additions. These elements are the essential inputs to sintered neodymium–iron–boron (NdFeB) permanent magnets used in electric-vehicle traction motors, wind-turbine generators, and a broad range of electronics and defence applications. Demand growth for magnet rare earths is driven principally by electrification and energy-transition end uses.

Global mined supply and, more acutely, separation and refining capacity remain geographically concentrated. This concentration has prompted sustained policy and commercial interest in establishing supply chains outside the dominant region, particularly within Europe and North America. The Project’s planned concentrate export to a European refiner is consistent with that supply-diversification objective. Quantitative market sizing, demand–supply balances and independent long-term price forecasts are matters for the issuer’s independent market consultant and are not reproduced here; the QP has adopted the price deck set out in Item 16.3 as a reasonable long-term real basis for the Initial Assessment.

16.4 Commodity Price Assumptions

The individual rare-earth oxide reference prices adopted by the QP are set out in Table 16-1. These are long-term real prices and are combined with the Mineral Resource oxide distribution to derive the basket price in Item 16.4.

Oxide	Element	Reference price (US\$/kg)	Distribution in TREO
La ₂ O ₃	Lanthanum	2.00	21.08%
CeO ₂	Cerium	2.00	49.70%
Pr ₆ O ₁₁	Praseodymium	165.00	6.00%
Nd ₂ O ₃	Neodymium	175.00	19.20%
Sm ₂ O ₃	Samarium	10.00	1.89%

Oxide	Element	Reference price (US\$/kg)	Distribution in TREO
Eu ₂ O ₃	Europium	30.00	0.42%
Gd ₂ O ₃	Gadolinium	225.00	0.99%
Tb ₄ O ₇	Terbium	3,500.00	0.08%
Dy ₂ O ₃	Dysprosium	750.00	0.21%
Ho ₂ O ₃	Holmium	88.00	0.00%
Er ₂ O ₃	Erbium	44.25	0.00%
Tm ₂ O ₃	Thulium	75.50	0.00%
Yb ₂ O ₃	Ytterbium	16.50	0.00%
Lu ₂ O ₃	Lutetium	525.50	0.00%
Y ₂ O ₃	Yttrium	16.00	0.43%

Table 16-1. Adopted rare-earth oxide reference prices and Mineral Resource distribution (constant July 2026 US\$). Distribution expressed as percentage of total rare-earth oxide by mass.

16.5 Rare Earth Oxide Prices — Data Sources and Price Basis

The rare earth oxide (REO) prices adopted in this Technical Report Summary — Initial Assessment (IAR) for the Sarfartoq Neodymium–Praseodymium Rare Earth Project were derived from a combination of independent published price assessments, subscription market-intelligence services and publicly available reference data. Given the neodymium–praseodymium (NdPr) magnet orientation of the deposit, particular emphasis was placed on sources providing robust NdPr, neodymium and praseodymium oxide pricing, together with supporting assessments for the associated heavy rare earth oxides (notably terbium and dysprosium). Unless otherwise stated, prices are expressed in real (constant) US dollars per kilogram of contained oxide on a free-on-board (fob) China basis. The principal data sources are summarized below.

Source	Description of data	Role in this report
Argus Media (Argus Rare Earths)	Independent, methodology-based spot assessments and 10-year price, demand and supply forecasts (fob China basis) for the key light and heavy rare earths.	Primary — long-term price forecasts

Source	Description of data	Role in this report
	Argus 10-year forecasts underpin the individual oxide price studies and the price basis adopted in this section.	
Adamas Intelligence	Subscription rare earth market-intelligence and long-term (to 2040) price forecasts for individual REOs on Western CIF, China EXW and China FOB bases.	Primary — market intelligence
Asian Metal / Shanghai Metals Market (SMM)	Spot and historical price data for individual rare earth oxides and metals, covering Chinese domestic and FOB China pricing.	Corroborating — spot pricing
U.S. Geological Survey (USGS)	Mineral Commodity Summaries (Rare Earths) — public reference data on supply concentration, refining capacity and historical price ranges.	Reference — supply/public data
IEA — Critical Minerals / Global EV Outlook	Long-term rare earth and magnet-demand projections (to 2040), used to corroborate the demand assumptions behind the price forecasts.	Reference — demand outlook

Table 16-2. Principal rare-earth oxide price-data sources and their role in this report.

The individual price studies for the four principal value-driving oxides — neodymium, praseodymium, terbium and dysprosium — each draw on Argus Media’s 10-year price, demand and supply forecasts (fob China), supported by USGS supply data and IEA long-term magnet-demand projections.

16.5.1 Supporting Oxide Price Studies and Long-Term Forecasts

Detailed price studies were reviewed for the four rare earth oxides that together generate most of the projected revenue at Sarfartoq: neodymium (Nd_2O_3), praseodymium (Pr_6O_{11}), terbium (Tb_4O_7) and dysprosium (Dy_2O_3). On the distribution and recovery assumptions adopted in the initial assessment, these four oxides account for approximately 92.4% of net basket revenue — neodymium alone contributing about 65% and the NdPr pair together approximately 84.1% — so the price basis for these oxides is the single most important market input to the economic

analysis. Each study is anchored to Argus Media's independent 10-year (long-term) price, demand and supply forecasts on a fob China basis, corroborated by USGS data on supply and refining concentration and by IEA projections of magnet-driven demand growth to 2040.

Common long-term themes. All four studies point in the same structural direction over the three-to-five-year horizon and beyond. Demand is underpinned by the continued build-out of NdFeB permanent magnets for electric-vehicle traction motors and wind turbines, with the IEA projecting magnet rare earth demand rising steadily through 2040. Supply remains highly concentrated — China controls roughly 85–90%+ of refining and separation capacity, with Myanmar a fragile upstream feedstock source — while non-China projects (Lynas, MP Materials, the France–Japan Caremag project and emerging US developments) are adding units only slowly and are unlikely to relieve near-term scarcity. The net effect is a market where the long-term price floor is judged to be structurally firmer than the 2023–24 lows.

Oxide (element)	Adopted price (US\$/kg)	Revenue contribution	Long-term (3–5 yr) forecast bias from study
Nd₂O₃ (Neodymium)	175	66.0%	Constructively bullish — refining concentration in China and slow non-China supply, set against magnet demand growth (EVs, wind) to 2040; higher average prices vs the 2023–24 baseline.
Pr₆O₁₁ (Praseodymium)	165	18.5%	Bullish with a rising floor — by 2028–30 demand heavier while supply stays disciplined; IEA magnet-REE demand climbs steadily through 2040.
Tb₄O₇ (Terbium)	3,500	5.4%	Strongly bullish — most supply-constrained heavy REE; structural undersupply with minimal new non-China refining (USGS).
Dy₂O₃ (Dysprosium)	750	2.9%	Strongly bullish — small, hard-to-substitute heavy REE, concentrated refining, recognized supply-chain vulnerability; structurally firmer long-run floor.

Table 16-3. Supporting oxide-price studies, revenue contribution and long-term forecast bias.

16.5.2 Benchmarking Against Current Oxide Markets

A distinction must be drawn between rare earth oxide prices, which are the basis of the economic model, and the rare earth metal retail quotations reported in some market commentary. Metal quotations trade at a substantial premium to the equivalent oxide, so a comparison of the adopted oxide prices against metal quotations overstates how conservative the deck is. Benchmarked on a like-for-like oxide, fob China basis, the adopted prices fall into two groups: the light rare earth oxides are set at or below prevailing market levels, while the two heavy rare earth oxides are carried above current spot to reflect their strongly bullish long-term outlook, as set out below.

Oxide (element)	Adopted price (US\$/kg)	Current oxide, fob China, 2026 (US\$/kg)*	Comment
Nd₂O₃	175	~184	At/below market — consistent with long-term view
Pr₆O₁₁	165	~160–180	In line with market
Tb₄O₇	3,500	~1,180–1,400	Above spot — embeds long-term appreciation
Dy₂O₃	750	~317	Above spot — embeds long-term appreciation

*Table 16-4. Adopted oxide prices benchmarked against indicative 2026 FOB China oxide markets. *Indicative fob China oxide levels compiled from public market sources during 2026; figures vary by source and date and should be validated against the relevant Argus assessment. Metal retail quotations (e.g. neodymium metal ~US\$245/kg) are materially higher and are not directly comparable to the oxide prices used in the model.*

The neodymium and praseodymium oxides that dominate the revenue basket — together approximately 84.1% of net revenue — are priced at or below prevailing fob China oxide levels and are therefore considered conservative relative to current market conditions. The dysprosium and terbium oxides are carried above current oxide spot; this reflects the structural under-supply and strongly bullish long-term forecasts described in the supporting studies, and these two oxides are stress-tested in the price sensitivity analysis.

16.5.3 Price Basis Adopted for the Initial Assessment

Regulatory basis. Regulation S-K 1300 requires the qualified person (QP) to select a price for each commodity that provides a reasonable and justifiable basis for economic analysis, to disclose that price together with the time frame and point of reference used, and to explain the reasons for the selection. The former mandatory three-year trailing-average limitation no longer applies, and a forward-looking, long-term price is permissible provided it is documented and reasonable. Consistent with that standard, the prices adopted for this initial assessment are set on a single, consistent basis — real, fob China, anchored to the Argus 10-year forecasts and, for the light rare earths, held at or below current spot. The adopted deck is summarized below.

Oxide	Adopted price (US\$/kg)	Basis / rationale
Nd₂O₃	175	Set at/below current fob China oxide (~\$184); anchored to Argus long-term forecast and the NdPr magnet-demand thesis.
Pr₆O₁₁	165	In line with the neodymium oxide basis and the consistent NdPr demand outlook.
Tb₄O₇	3,500	Carried above current oxide spot to reflect structural heavy-REE undersupply and the strongly bullish long-term forecast; stress-tested in the price sensitivity analysis.
Dy₂O₃	750	Carried above current oxide spot to reflect structural heavy-REE scarcity and the strongly bullish long-term forecast; stress-tested in the price sensitivity analysis.
All other REOs	as modelled	Minor contributors priced on the same fob China basis; La ₂ O ₃ /CeO ₂ at US\$2/kg reflect the current oversupplied light-REE market.

Table 16-5. Rare-earth oxide price basis adopted for the Initial Assessment.

Base-case price basis. The base-case price basis adopted for this Initial Assessment is stated here in one place and governs every economic result reported outside Item 19.8.

Element of the price basis	Adopted for the base case
Price basis / incoterm	Strategic Western (ex-China) delivered oxide basis. Not a Chinese domestic basis and not a FOB China basis.
Price source	Qualified Person's long-term real deck, benchmarked against published price-reporting-agency assessments and long-term forecasts as described at Items 16.5.1 to 16.5.4 and Appendix C.
Currency and date basis	Constant second-quarter 2026 United States dollars. No escalation.
Oxide and purity basis	Separated rare-earth oxide, commercial purity, priced per kilogram of contained oxide.
Freight and premium adjustment	The Western premium is taken once, in the oxide price. No further freight or premium adjustment is applied.

Element of the price basis	Adopted for the base case
Product sold	Bulk flotation concentrate at the mine gate, not separated oxide.
TREO basket price	US\$51.88 per kilogram of contained TREO (Table 16-9)
Payability	75.4%, derived from a fixed processing toll of US\$12.74 per kilogram of contained TREO (Item 16.7.6). Not selected from a comparable range.
Net realized price	US\$39.14 per kilogram of contained TREO
Metallurgical recovery applied	63.6% (Item 10.8), applied once, in the revenue calculation
Nd + Pr share of basket value	83.9%
Four priced value drivers (Nd, Pr, Tb, Dy) share of basket value	92.4%

Table 16-6. Base-case price basis. Every element of the base case is stated here; any description elsewhere in this report that differs from this table is a sensitivity and is separately labelled as such. The CIF Europe (Rotterdam) delivered tier evaluated at Item 19.8 is a sensitivity scenario on commodity price and forms no part of the base case.

Because the neodymium and praseodymium oxides that drive the Sarfartoq revenue basket are priced at or below prevailing fob China oxide levels, and every price is anchored to independent long-term forecasts on a consistent Strategic Western basis, the qualified person considers the adopted deck reasonable and justifiable for an Initial Assessment.

16.5.4 Strategic Western price basis

The adopted oxide price deck is a strategic Western (ex-China) price basis, not a Chinese domestic or FOB China basis. Rare earth oxides are not exchange-traded and are quoted on several delivery bases that have diverged materially since China's April 2025 export controls: a lower Chinese domestic / FOB China market and a higher Western (ex-China / CIF) market, most pronounced for the heavy rare earths. Because Sarfartoq is a non-China source intended for qualification into a Western supply chain (the proposed Neo Performance Materials / Silmet route, Items 3 and 16), its realized prices are assessed on a Western sales basis; FOB China is treated as a transparent downside reference rather than the mine-gate value. The full derivation and sources are set out in Appendices C and D.

On the Western basis the adopted deck is well supported. Dysprosium (US\$750/kg) and terbium (US\$3,500/kg) sit at or below the post-control CIF Europe assessments reported by Benchmark Mineral Intelligence (≈US\$800/kg and ≈US\$3,625/kg respectively); yttrium is conservative against 2026 Western spot; and neodymium and praseodymium carry a strategic-Western premium above the Chinese benchmark (≈US\$123/kg NdPr, February 2026) and the US\$110/kg MP Materials support reference, justified by security-of-supply and qualification

value. The neodymium, praseodymium and gadolinium prices are at the strategic end of the defensible range and are the principal price uncertainties.

Oxide	% TREO	Adopted US\$/kg	Western reference	Position	Basis
Nd₂O₃	18.8%	175	≈123 China / 110 support	above	Strategic-Western magnet-oxide value
Pr₆O₁₁	5.9%	165	≈123 China / 110 support	above	Strategic-Western magnet-oxide value
Tb₄O₇	0.08%	3,500	≈3,625 CIF Europe	at/below	Below observed Western CIF spot
Dy₂O₃	0.20%	750	≈800 CIF Europe	at/below	Below observed Western CIF spot
Y₂O₃	0.43%	16	>> 2026 Western spot	below	Conservative vs Western spot

Table 16-7. Strategic Western price-basis comparison for the principal value-driving oxides.

Consistency of basis. The price basis and the payability mechanism are matched: the Western premium is taken once, through the oxide price, and partially returned through 75.4% concentrate payability; metallurgical recovery is applied once, and treatment and refining charges are not separately deducted. This avoids double counting the strategic premium.

The deck is carried as three coherent price cases, each a complete recomputation of the cash flow, replacing a simple percentage price band in the sensitivity analysis (Item 19.7):

Price case	Basket contained TREO US\$/kg	Net realized US\$/kg	After-tax NPV8 (US\$M)
FOB China (downside sensitivity)	32.00	19.26	(248)
Normalized Western (sensitivity)	45.00	32.26	434
Strategic Western (adopted base case)	51.88	39.14	897

Table 16-8. Price cases. Each case is a complete recomputation of the cash flow at the stated basket, with the processing toll held fixed at US\$12.74 per kilogram of contained TREO, so the net realized price and the implied payability move with the basket. Because the toll is fixed in dollars, the downside case is severe: at a US\$32.00 basket the toll consumes 40% of gross value and the project does not carry its capital. Only the Strategic Western case is the base case; the other two are sensitivities and no result from them is carried into the reported economics.

16.6 Basket Price and Revenue Contribution

The basket price is the value of one kilogram of contained total rare-earth oxide at the distribution of oxides in the material scheduled. It is computed by applying the per-oxide price deck of Item 16.5 to that distribution and summing.

The adopted basket price is US\$51.88 per kilogram of contained TREO on the Strategic Western price basis. Against that basket the processing toll of Item 16.7.6 gives a net realised price of US\$39.14 per kilogram.

Oxide	Price (US\$/kg)	Distribution (% of TREO)	Contribution (US\$/kg)	Share of basket (%)
Nd ₂ O ₃	175.00	19.200	33.60	64.8
Pr ₆ O ₁₁	165.00	5.994	9.89	19.1
Tb ₄ O ₇	3,500.00	0.081	2.83	5.5
Gd ₂ O ₃	225.00	0.988	2.22	4.3
Dy ₂ O ₃	750.00	0.205	1.54	3.0
Ce ₂ O ₃	2.00	49.710	0.99	1.9
La ₂ O ₃	2.00	21.080	0.42	0.8
Sm ₂ O ₃	10.00	1.890	0.19	0.4
Eu ₂ O ₃	30.00	0.420	0.13	0.2
Y ₂ O ₃	16.00	0.430	0.07	0.1
Total		100.000	51.88	100.0

Table 16-9. Basket price build. Contribution is the adopted price multiplied by the oxide's share of contained TREO, and the contributions sum exactly to the adopted basket of US\$51.88 per kilogram. Distribution is weighted by the contained total rare-earth oxide of all four scheduled sources — open-pit Indicated, open-pit Inferred, underground Indicated and underground Inferred — and is stated to three decimal places so that the arithmetic is reproducible. Holmium, erbium, thulium, ytterbium and lutetium carry no reported distribution at ST1 and contribute nothing to the basket. Share of basket columns are rounded and may not sum exactly.

Two features of the basket govern the economics of the project. First, it is overwhelmingly a neodymium and praseodymium basket: those two oxides contribute 83.9% of the value while representing 25.2% of the mass. Second, cerium and lanthanum together represent 70.8% of the mass and contribute 2.7% of the value, so the TREO grade of the deposit substantially overstates the value density of the material.

Oxide nomenclature and the cerium basis

One nomenclature is used throughout this report for resource and TREO reporting: the oxide species reported in the MRE, in which cerium is reported as Ce_2O_3 . TREO is the sum of La_2O_3 , Ce_2O_3 , Pr_6O_{11} , Nd_2O_3 , Sm_2O_3 , Eu_2O_3 , Gd_2O_3 , Tb_4O_7 , Dy_2O_3 and Y_2O_3 , consistent with Item 11.

The cerium price of US\$2.00 per kilogram is quoted by the price reporting agencies for CeO_2 , the traded oxide form; the conversion from Ce_2O_3 to CeO_2 is a factor of 1.049 on a mass basis ($2 \times \text{CeO}_2$, molar mass 344.23, divided by Ce_2O_3 , molar mass 328.24). Cerium contributes 1.9% of basket value at US\$2.00 per kilogram, so the conversion is immaterial to the result, and no adjustment is carried in the model. The two forms are not used interchangeably: Ce_2O_3 is the reporting basis and CeO_2 appears only where a quoted price is identified.

The distribution used in this build is weighted by the contained total rare-earth oxide of all four scheduled sources.

The basket price moves with the price deck and with the oxide distribution of the material scheduled. It is not a constant of the deposit. A price scenario at the CIF Europe (Rotterdam) delivered tier, computed on this same distribution and this same arithmetic with only the per-oxide prices changed, is presented in Item 19.8 and returns a basket of US\$74.01 per kilogram.

16.7 Payability, Offtake and Marketing

16.7.1 What payability is, and what determines it

Payability is the proportion of the contained rare-earth basket value that the producer receives from the buyer. The balance is retained by the buyer to meet the cost of converting the product into saleable separated oxides and to provide the buyer's margin. It is therefore not a discount negotiated in the abstract: it is the price of the processing steps that the producer has chosen not to perform.

It follows that payability is determined principally by the form of the product sold, and secondarily by its grade. Published disclosure across the sector groups into three distinct product classes, and the payability attaching to each differs by a wide margin. The classes are not interchangeable for benchmarking purposes.

Mixed Rare Earth Carbonate (MREC).

This is the intermediate product you get after cracking and leaching a concentrate and precipitating the rare earths back out as a carbonate — typically 50–60% TREO, with most of the gangue (apatite, silicates, iron) already removed, but the individual rare earths still mixed. Separation into individual oxides happens downstream.

It matters to the payability question because it sits one processing step further along than a flotation concentrate. The buyer of an MREC only must do the separation; the buyer of a concentrate must do the cracking, leaching *and* separation. That extra step is essentially what the 25–30 payability points buy.

You'll also see MREC written as "mixed rare earth carbonate" or occasionally REC. Lynas ships a concentrate to Malaysia; Mkango's Songwe Hill and Defense Metals' Wicheeda both produce an MREC as their sale product, which is why their payability sits in the 73–95% band rather than the 48–62% band.



Agricola
MINING CONSULTANTS

Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

16.7.2 Benchmark evidence

Product class	Project and source	Concentrate or product grade	Payability
Flotation concentrate	Ngualla (Peak Rare Earths), binding offtake with Shenghe, disclosed May 2024	>45% TREO	48.0% – 54.4%
	Ngualla, same schedule	>50% TREO	51.5% – 57.1%
	Ngualla, same schedule	>55% TREO	53.7% – 58.6%
	Ngualla, BFS Update October 2022 modelling assumption	45% TREO	60.9% (range 56–62%)
Mixed rare earth carbonate	Songwe Hill (Mkango), DFS July 2022	55% TREO MREC	73% (27% discount)
	Songwe Hill, updated study March 2026, captive sales to own plant	55% TREO MREC	85%
	Ashram (Commerce Resources), PEA May 2012	MREC	75% (25% discount)
	Carina (Aclara), PFS 2025	MREC	≈71% (29% commercial discount)
	Wicheeda (Defense Metals), PFS February 2025, Adamas assumption	MREC	95%
Separated oxides	Nolans (Arafura), DFS	Separated NdPr oxide	100%
	Nolans, SEG/HRE stream	Mixed carbonate	70% (Dy and Tb only)
	Phalaborwa (Rainbow), March 2026	Separated NdPr	100%; SEG+ 70%

Table 16-10. Published payability disclosure by product class. Sources are listed in Item 24.

16.7.3 Payability rises with concentrate grade

The relationship is not merely directional; one project has published the schedule. The Ngualla offtake agreement with Shenghe discloses contractual payability at three concentrate grades, and the pattern is an increase of approximately three and a half percentage points of payability for each five percentage points of concentrate grade between 45% and 50% TREO, and approximately two points between 50% and 55%. Payability also rises modestly with the rare-earth price, because the buyer's conversion cost is largely fixed and is therefore diluted as the value of the contained metal increases.

The economic logic is straightforward. A lower-grade concentrate carries more gangue for each unit of contained rare earth. The buyer transports, leaches and disposes of that gangue, and prices accordingly.

16.7.4 The Sarfartoq concentrate in that context

Grade. The concentrate contemplated in this Initial Assessment grades approximately 9.6% TREO (Item 14). Every carbonatite project identified in the benchmark research that sells a flotation concentrate sells one grading 43% TREO or better. No published payability schedule extends below 40% TREO.

Precedent. The Qualified Person located one study built on a flotation concentrate of comparable grade — the Ashram project, at approximately 10% TREO. In that study the concentrate was treated as an on-site intermediate and was not sold; the saleable product was a mixed rare earth carbonate produced by on-site cracking and leaching. The Qualified Person was unable to identify any published price, offtake precedent or payability schedule for a rare-earth flotation concentrate in the 8% to 15% TREO range, which is the range within which the Sarfartoq concentrate at 8.25% TREO falls. That is an absence of evidence and is reported as such; it is not evidence that such a concentrate is unsaleable, but it does mean that no external benchmark supports any payability for it.

Composition. The concentrate also carries approximately 42% apatite and 34% carbonate gangue and contains thorium as naturally occurring radioactive material (Items 10 and 17). Each is a factor that a buyer would ordinarily reflect in the terms offered.

16.7.5 Payability and the flowsheet are the same decision

The difference between flotation-concentrate payability and mixed-carbonate payability — some twenty-five to thirty percentage points — is the price of the cracking and leaching step. The Qualified Person has modelled that step directly, to establish what it is worth.

Configuration	Assumed payability	After-tax NPV at 8% real
Sell the concentrate	55% (benchmark for the product class)	US\$338M
Sell the concentrate	60%	US\$476M
Sell the concentrate	65%	US\$612M

Configuration	Assumed payability	After-tax NPV at 8% real
Sell the concentrate	75.4% (derived from the toll, adopted — see 16.7.6)	US\$897M
Sell the concentrate	85% (upper sensitivity point only; not adopted)	US\$1,157M
Convert on site, sell MREC	85% MREC payability, conversion at US\$5/kg TREO, +US\$120M capital	US\$591M
Convert on site, sell MREC	85% MREC payability, conversion at US\$7/kg TREO, +US\$120M capital	US\$496M
Convert on site, sell MREC	85% MREC payability, conversion at US\$10/kg TREO, +US\$120M capital	US\$347M
Note on basis. Every row is a complete recomputation of the cash flow on the 19 August 2026 fiscal engine, on the confirmed invoice-sales-value royalty base, with the annual Payable Royalty, class-specific depreciation, loss carry-forward and corporate income tax recalculated in each case. The concentrate rows are computed at the stated payability. The conversion rows assume 90% hydrometallurgical recovery of contained TREO, a mixed rare-earth carbonate sold at 85% payability, the stated conversion cost per kilogram of contained TREO and US\$120 million of additional capital; no site-specific conversion cost estimate exists, and those three assumptions are the qualified person's, not a quotation.		

Table 16-11. Flowsheet trade-off, evaluated on the hybrid production schedule. The MREC cases assume 90% hydrometallurgical recovery and carry an additional US\$120 million of capital. Conversion cost is the principal uncertainty and no site-specific estimate exists.

Two conclusions follow, and the second is material to the assumption adopted in Item 16.7.6.

- On-site conversion does not add value at the payability adopted. Against the 75.4% concentrate payability derived in Item 19, every mixed rare-earth carbonate case tested — conversion at US\$5, US\$7 and US\$10 per kilogram of contained TREO — returns a materially lower after-tax net present value than selling the concentrate: US\$591 million, US\$496 million and US\$347 million against US\$897 million. On the re-run basis on-site conversion becomes worth evaluating only if the achievable concentrate payability falls to about 65% or below, where the concentrate case returns US\$612 million. No site-specific conversion cost estimate exists, and the conversion cases rest on three assumptions of the qualified person — 90% hydrometallurgical recovery, a mixed carbonate sold at 85% payability and US\$120 million of additional capital — none of which is a quotation. The comparison should be revisited when a site-specific conversion cost estimate is obtained, which is a recommendation of this report.
- Selling the concentrate at a mixed-carbonate payability is more valuable than producing a mixed carbonate. That result is not an opportunity; it is a warning. It arises because such

an assumption credits the producer with the payability of a conversion step while charging the cost of that step to the buyer. The twenty-five to thirty points in question are the buyer's compensation for work the buyer performs, and on the re-run basis that work is worth between about US\$567 million and US\$810 million of net present value. A counterparty would not be expected to forgo it.

16.7.6 The payability adopted

Payability is not selected in this report. It is derived, and it is derived from the cost that stands between a bulk flotation concentrate at the mine gate and separated oxide in the hands of a customer. That cost comprises cracking and separation and the processor's margin. It is incurred in dollars per kilogram of contained total rare-earth oxide, not as a proportion of the price, and it is therefore modelled that way.

Component of the toll	US\$/kg contained TREO
Cracking and separation cost	8.60
Processor margin	4.14
Total toll	12.74

Table 16-12. Derivation of the processing toll for the base-case tier.

At the adopted basket price of US\$51.88 per kilogram of contained TREO, a toll of US\$12.74 per kilogram implies a payability of **75.4%** and a net realised price of US\$39.14 per kilogram. Payability is therefore an output of the derivation and moves whenever the basket price moves.

Payability is derived, not selected

The base-case payability is 75.4%, derived from a fixed processing toll of US\$12.74 per kilogram of contained TREO. The 75% payability row in the sensitivity ladder at Table 19-13 is a rounded sensitivity point and is not the base-case assumption. Payability is not adopted from a comparable range, and no comparable-range rationale is relied upon anywhere in this report.

The evidence supporting each component of the toll is of limited maturity at this stage of study. No processor quotation for Sarfartoq concentrate is available. The qualified person has therefore bracketed the toll against the lodged accounts and contract disclosures of listed Western rare-earth companies, which can be checked by a reader.

16.7.6.1 Corroboration of the toll from public filings

Lynas Rare Earths reports an integrated cost of production of approximately US\$17 to US\$18 per kilogram of rare-earth oxide at run-rate, and approximately US\$25.4 per kilogram in the FY25 ramp year. Removing the mining and concentration steps from the integrated figure implies a Western downstream cracking-and-separation band of roughly US\$11 to US\$17 per kilogram. The toll of US\$12.74 per kilogram adopted in this report falls inside that band and below its midpoint.

Two further observations support the treatment. The delivered-tier stack of US\$25.01 per kilogram adopted in the CIF Europe (Rotterdam) price scenario at Item 19.8 is approximately the whole of Lynas's ramp-year cost per kilogram, so that scenario's payability is conservative by construction rather than by assertion. And the USA Rare Earth / Serra Verde contract disclosure prices its upside expressly net of separation costs, which corroborates that a deduction of this kind is a real contractual term in Western offtake arrangements rather than a modelling construct.

Why high payability assumptions are commonly encountered

The Chinese domestic separation toll tier sits at approximately US\$2 to US\$4 per kilogram. That is the arithmetic reason payability assumptions in the 85 to 90 per cent range are commonly encountered in rare-earth studies, and it is the reason they do not transfer to a Western processing stack. Applied against the adopted basket, a Chinese-tier toll would imply a payability above 90 per cent. A payability of 85% against the adopted basket implies a toll of approximately US\$7.80 per kilogram, which lies between the Chinese tier and the Western band and below the cost stack set out in this Item. The derived figure of 75.4% is consistent with a Western stack, and is the figure adopted.

This evidence brackets the toll; it does not quote it. Each figure relates to a different operation with a different feedstock, flowsheet, scale and stage of ramp-up, and the separation component

has been inferred by deduction from integrated results rather than reported directly. The corroboration therefore narrows the outstanding item recorded at Item 19.9 without closing it. A processor-sourced range obtained through the offtake counterparty remains required and is included in the Phase 2 commercial work at Item 23.3. The evidence is set out with dated figures and source classifications at Appendix C.11.

16.7.7 Sensitivity to the toll and to payability

Because payability is an output of the fixed US\$/kg toll, sensitivity is properly expressed as sensitivity to that toll. The toll/payability ladder in this report has been recomputed through the 19 August 2026 fiscal engine and is set out at Table 19-13. At the adopted 75.4% the after-tax NPV8 is US\$897 million; at 60% it is US\$476 million and at 85% US\$1,157 million.

One consequence of a toll fixed in dollars per kilogram deserves emphasis, because it changes the character of the project's price exposure. When the basket price falls, the toll does not fall with it, so the whole of the reduction is borne by the producer. The project is therefore geared to price. This is quantified in Item 19.7.3 and is the principal reason basket price and delivered head grade are no longer equivalent sensitivities.

16.7.8 Qualified Person's statement

Qualified Person Statement — payability

The adopted payability of 75.4% is derived from a processing toll of US\$12.74/kg contained TREO and is not an executed commercial term. Published precedents identified for other rare-earth products and grades do not establish a price for the approximately 8.25% TREO flotation concentrate contemplated here. The adopted deterministic 75.4% case returns an after-tax NPV8 of US\$897 million, and the full ladder has been recomputed on the same fiscal schedule, from US\$476 million at 60% to US\$1,157 million at 85% (Table 19-13). Processor-sourced terms and pilot-scale samples are required before PFS-level confirmation.

16.8 Material Contracts

As at the effective date of this report the issuer has not entered any binding offtake, sales, transport or refining contract in respect of the Sarfartoq ST1 concentrate. The registrant has advised of a non-binding memorandum of understanding with Neo Performance Materials. A memorandum of understanding is not a binding offtake agreement, confers no enforceable commitment as to volume, price or payability, and is not relied upon in the economic analysis. The price, payability and freight assumptions adopted in this report are the qualified person's estimates and are not executed commercial terms. Processor-sourced terms and pilot-scale concentrate samples are required before PFS-level confirmation of payability.

16.9 Market Assessment and Marketing Assumptions

Market Assessment



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

The Sarfartoq Project is proposed to produce a mixed rare earth flotation concentrate containing the principal magnet rare earth elements neodymium (Nd), praseodymium (Pr), dysprosium (Dy) and terbium (Tb). The concentrate is intended for export to an established third-party rare earth separation facility for further processing into individual rare earth oxides.

The Qualified Person has reviewed the current structure of the global rare earth industry, published market forecasts and available information relating to demand for magnet rare earth elements. Attention has been given to independent market assessments published by Argus Media, Adamas Intelligence, Benchmark Mineral Intelligence, the International Energy Agency (IEA), the United States Geological Survey (USGS) and other recognized industry sources.

Demand for Nd-Pr is expected to continue increasing over the medium to long term, principally driven by permanent magnet manufacture for electric vehicles, offshore wind generation, industrial automation, robotics, defence applications and other strategic technologies. Although short-term price volatility remains significant, long-term market forecasts generally indicate continued structural growth in demand for magnet rare earths, particularly from supply chains outside China.

The Sarfartoq concentrate is expected to be marketed through established commercial relationships with specialist rare-earth processors. The registrant has advised of a non-binding memorandum of understanding with Neo Performance Materials. That memorandum is not a binding offtake agreement, and no value is attributed to it in the economic analysis. No binding offtake, sales, transport or refining agreement exists at the effective date of this report.

The Qualified Person considers that sufficient market capacity exists to absorb the anticipated production from the Sarfartoq Project and that reasonable prospects exist for future concentrate sales under normal commercial arrangements.

Price Assumptions

Commodity prices adopted for the economic evaluation have been selected to represent long-term real prices rather than current spot prices. The adopted prices reflect published industry forecasts, historical pricing trends, long-term market fundamentals and the Qualified Person's judgement regarding sustainable pricing over the anticipated operating life of the Project.

The economic analysis has adopted long-term real price assumptions considered reasonable for an Initial Assessment. As noted above, the adopted deck remains elevated relative to long-term historical averages, and that exposure is quantified in the price sensitivities at Item 19.7, which are computed on the current fiscal basis. These assumptions are not intended to represent short-term market conditions.

16.10 Qualified Person's Opinion

Qualified Person Opinion — Market Studies

Neodymium and praseodymium contribute approximately 84% of basket value and the four magnet oxides approximately 92%. The adopted basket price of US\$51.88/kg and derived 75.4% payability

give a net realised price of US\$39.14/kg. The processing toll is bracketed against Western producers' lodged accounts but is not yet quoted by a processor, and no binding offtake, sales, transport or refining agreement is in place.

The fiscal update has been implemented, the deterministic case has been reconciled through it, and the price, toll and payability sensitivities in this Item have been recomputed on the same schedule. At the adopted payability the after-tax NPV8 is US\$897 million; the ladder runs from US\$476 million at 60% to US\$1,157 million at 85%.

Subject to these limitations, the QP considers the market assumptions reasonable for an Initial Assessment, but processor-sourced terms and independent current price corroboration remain required before filing or advancement to pre-feasibility.

ITEM 17 — ENVIRONMENTAL STUDIES, PERMITTING AND SOCIAL

Environmental Studies, Permitting and Social Considerations Summary

- The project is at the exploration-Licence stage; the EIA / SIA process has not yet commenced.
- The Aasivissuit–Nipisat World Heritage Site lies in the region, and its interaction must be assessed.
- Low uranium content is favorable under the Uranium Act; thorium (NORM) management is required.

The Sarfartoq ST1 Project remains at the exploration stage, with environmental baseline studies currently in progress and the statutory permitting process for an Exploitation Licence yet to commence. The Project is located within an Arctic environment characterized by continuous permafrost, significant wildlife habitats and sensitive cultural values, requiring comprehensive environmental and social assessment before mining can proceed. Existing studies indicate no fundamental environmental impediments to development; however, detailed baseline investigations, environmental impact assessment and stakeholder consultation remain essential components of the Project's advancement.

Key environmental considerations include the management of naturally occurring radioactive material (principally thorium), engineered storage of flotation tailings and waste rock, protection of surface and groundwater resources, and mine closure planning. The Project also lies within the broader Qeqqata region, where careful assessment of potential interactions with the Aasivissuit–Nipisat UNESCO World Heritage cultural landscape, regional wildlife, subsistence activities and archaeological heritage will form an important part of the permitting process. The low uranium content of the mineralisation is considered favorable with respect to Greenland's Uranium Act and reduces a potentially significant permitting risk.

The Qualified Person considers the Project's environmental and permitting position to be appropriate for an Initial Assessment and has not identified, from the information reviewed, a known environmental or regulatory issue that necessarily prevents future development; however, material baseline, engineering and permitting work remains outstanding. The principal outstanding tasks include completion of multi-year environmental and radiological baseline studies, preparation of the Environmental and Social Impact Assessments, development of tailings and closure management plans, confirmation of heritage and World Heritage interactions, and negotiation of an Impact Benefit Agreement with local stakeholders. These activities represent the normal pathway toward securing an Exploitation Licence and advancing the Project to the Pre-Feasibility Study stage.

This section addresses the environmental and social setting, the permitting pathway and community matters.

17.1 Environmental and social baseline

The Sarfartoq ST1 Project remains at the exploration and Initial Assessment stage; environmental and social baseline investigations are underway but not yet complete. Baseline studies undertaken to date include initial characterization of surface water, groundwater, soils, flora and fauna, baseline radiological surveys, and preliminary assessments of cultural heritage and land use within the Licence area. No material environmental or social constraints have been identified to date that would prevent the potential future development of the Project, recognizing that further work is required to confirm this conclusion.

Uranium concentrations within the ST1 mineralized zones are low, on the order of approximately 5 ppm, below the 100-ppm threshold under the Greenland Uranium Act, which reduces regulatory complexity compared with many rare earth deposits that contain higher uranium levels. Nonetheless, the Project will require careful management of naturally occurring radioactive materials (NORM), particularly thorium, in waste rock, tailings and concentrates, in accordance with Greenland regulatory requirements and international best practice.

17.2 Permitting requirements and status

Development of the Sarfartoq ST1 Project will require completion of an Environmental Impact Assessment (EIA), Social Impact Assessment (SIA), Mine Closure Plan, NORM management plan, and an Impact Benefit Agreement with relevant Greenland authorities and stakeholders, as well as the grant of an Exploitation Licence. At the effective date of this Technical Report Summary, the Project is held under Exploration Licence MEL 2020-32, and formal EIA and SIA processes have not yet commenced; preliminary scoping and engagement activities are in progress.

The principal environmental and social risks identified at this stage relate to tailings storage and water management in an Arctic environment, potential impacts on fjord ecosystems associated with concentrate shipping, NORM handling and disposal, climate and access constraints, and the need to secure community and governmental support for mine development. The Qualified Person considers these risks to be typical for a rare earth project in Greenland and recommends that they be addressed through progressive baseline expansion, early regulatory engagement, engineering optimization of waste facilities, and development of robust environmental and social management plans prior to a Pre-Feasibility Study.

17.3 Key environmental and social considerations

Consideration	Status / significance
Environmental baseline	In progress; second year planned 2026
Permafrost / Arctic climate	Foundation, tailings and water-management design driver (Item 15)

Consideration	Status / significance
Wildlife (caribou, muskox)	Significant regional herds; subsistence and conservation importance
Aasivissuit–Nipisat World Heritage Site	UNESCO cultural landscape in region / logistics corridor — confirm spatial relationship
NORM (thorium)	Present in REE/accessory minerals; management plan required
Uranium (Uranium Act)	~5 ppm — below 100 ppm exploitation threshold (favorable)
Tailings / waste / water	Engineered storage in permafrost; NORM; closure
Permitting (EIA / SIA)	Not yet commenced; exploitation Licence required
Closure & financial security	Required before mining; to be planned
Community / IBA	Impact Benefit Agreement required; subsistence & heritage sensitivities

Table 17-1: Key environmental and social considerations. Source: QP, from GRML disclosures and Items 3, 4, 6, 14 and 15.

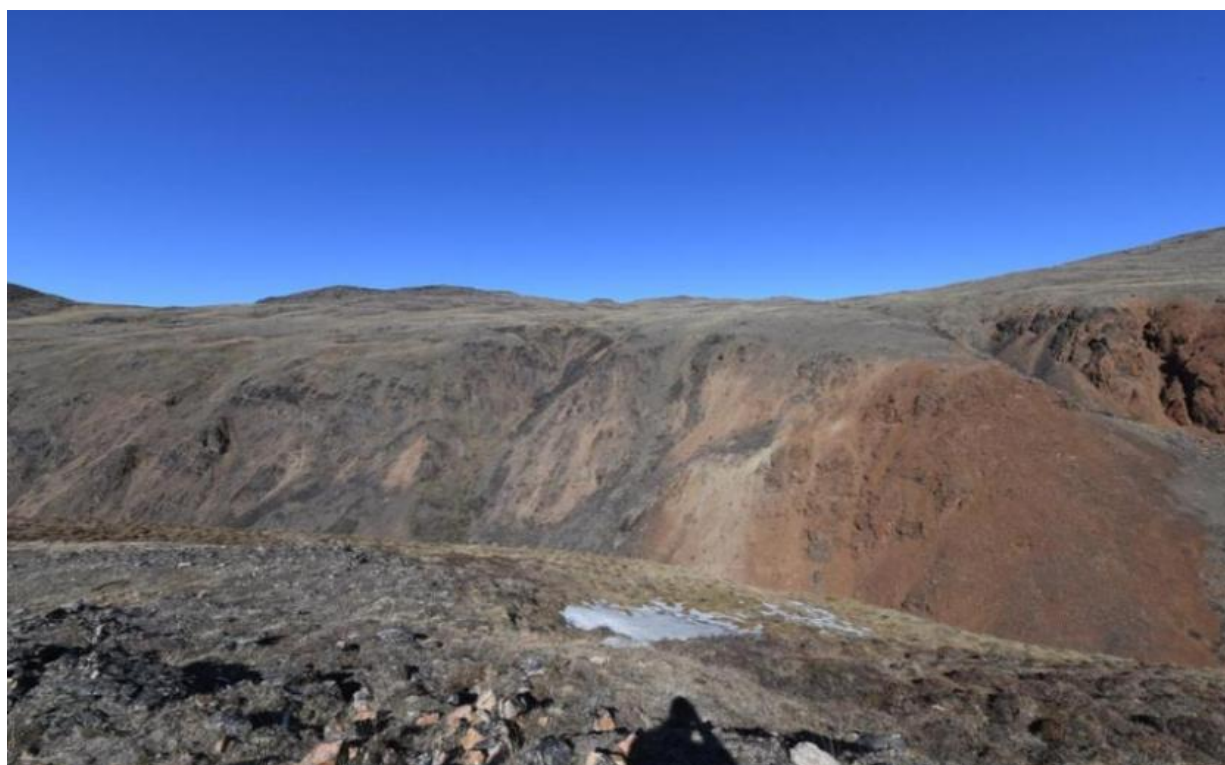


Figure 17-1. ST1 mineralized zone and surrounding environmental setting.

17.4 Environmental and social setting

The project lies in the Qeqqata municipality of central-west Greenland, in a continental sub-arctic / tundra setting of ice-scoured gneiss, sparse tundra vegetation and continuous permafrost (Item 4). The region supports wildlife of significant subsistence and conservation importance: the Kangerlussuaq area is one of Greenland's principal caribou and muskox ranges — muskox were introduced south of Kangerlussuaq in 1962 and now number on the order of 10,000, and the wider area supports an estimated 90,000 caribou — together with arctic hare and arctic fox, and marine mammals and fish in the fjord system. The fjords and coast support fisheries and subsistence harvesting by the regional communities. Baseline characterization — meteorology, hydrology, surface- and ground-water quality, terrestrial and aquatic ecology, and the radiological baseline — is in progress, with a second year of data planned for 2026.

17.5 Protected areas and cultural heritage

A material feature of the region is the Aasivissuit–Nipisat: Inuit Hunting Ground between Ice and Sea, a UNESCO World Heritage Site (cultural landscape) inscribed in 2018. The site lies in the Qeqqata municipality and stretches along an approximately 235 km east–west transect from Nipisat Island on the coast (south of Sisimiut) to the Greenland Ice Sheet near Kangerlussuaq, with its eastern key locality, Aasivissuit, about 20 km north-west of Kangerlussuaq. It protects more than 4,000 years of Palaeo-Inuit and Inuit hunting heritage — archaeological sites, caribou drive systems and winter houses — and includes a living settlement (Sarfanguit); its recognized values include the integrity of the landscape, and the maintenance of unhindered views free of modern visual intrusion.

WORLD HERITAGE INTERACTION

The Sarfartoq deposit lies in the same region but on a different bearing (approximately 50–60 km south-south-east of Kangerlussuaq) and is not understood to fall within the World Heritage core area. However, the project's logistics corridor — air and surface access via Kangerlussuaq, and any marine route through the fjord system toward Sisimiut — may interact with, or pass close to, the World Heritage Site and its setting.

The spatial relationship between the Licence area, the proposed infrastructure and the access / marine corridors and the Aasivissuit–Nipisat boundary and buffer must be established, and any heritage and visual-amenity impacts assessed, as a priority in the environmental and permitting work. An archaeological survey of the Licence and infrastructure footprint will also be required. The QP regards this as a key permitting and social-acceptance consideration.

17.6 Naturally occurring radioactive material and the Uranium Act

The deposit carries naturally occurring radioactive material (NORM): thorium is hosted in the rare earth and accessory minerals (Items 6 and 14), while uranium is low. Greenland's Uranium Act (Inatsisartut Act No. 20 of 1 December 2021) prohibits the exploitation of uranium and of any mineral resource containing more than 100 ppm uranium and authorizes the Government to extend similar restrictions to other radioactive elements. The available composite head assays indicate uranium of the order of 5 ppm — well below the 100-ppm threshold — which is favorable; this should be confirmed across the Mineral Resource. Thorium is not presently

subject to a prohibition, but its management is a radiological, product-specification, transport and closure consideration: thorium partitions partly to the concentrate (affecting product specification and the regulation of radioactive material in transport) and partly to the tailings (a radiological storage and closure matter). A NORM management plan covering occupational exposure, product radioactivity, tailings and closure will be required.

17.7 Waste, tailings, water and closure management

Flotation tailings are produced at 1,261,040 t/a at nameplate throughput and total 11.023 Mt over the life of mine (Item 14.7). They are carbonate-dominated and carry NORM; together with 2.7685 Mt of open-pit waste rock and overburden, they require engineered storage designed for continuous permafrost.

17.8 Permitting framework and pathway

Environmental and social permitting is governed by the Mineral Resources Act and administered by the Environmental Agency for Mineral Resource Activities (EAMRA) for environmental matters, the Mineral Resources Authority for social matters, and the Mineral Licence and Safety Authority (MLSA) for mining and safety. The right to mine requires an exploitation Licence under Item 16 of the Act, conditional on an approved Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA). The pathway is: Terms of Reference for the EIA and SIA are published (in Greenlandic, Danish and English) for a 35-day public hearing; the licensee addresses comments in a White Paper and submits revised Terms of Reference; draft EIA and SIA reports are then published for a minimum eight-week public consultation; comments are again addressed in a White Paper; and, following approval, a Mine Plan, a Closure Plan and financial security are required before mining may commence. Recent exploitation-Licence grants in Greenland indicate an efficient, if thorough, current process. The project has not yet entered this pathway.

17.9 Community engagement and Impact Benefit Agreement

The nearest communities are Kangerlussuaq and Sisimiut (Item 4); Sarfannguit, a living settlement within the World Heritage area, and other Qeqqata communities also use the region for subsistence hunting and fishing. The region's caribou and muskox herds and fjord fisheries are of direct subsistence and cultural importance, and the protection of subsistence use and of the World Heritage values will be central to community acceptance. An Impact Benefit Agreement (IBA) between the company, the municipality and the Government — addressing local employment, training, contracting and community benefits — is a condition of an exploitation Licence.

17.10 Qualified Person's comment and items to be completed

Qualified Person's Opinion



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 - Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

In the QP's opinion the project's environmental and permitting position is at an early but not unfavorable stage. The low uranium content is favorable under the Uranium Act, and Greenland's permitting process, though thorough, is functioning and predictable.

The principal environmental and social matters to be advanced — none yet resolved — are completion of the multi-year environmental and radiological baseline; the spatial relationship to, and any impacts on, the Aasivissuit–Nipisat World Heritage Site and its setting; the NORM (thorium) management plan; the tailings, waste, water and closure designs with financial security; and the EIA, SIA and IBA. These are normal initial-assessment open items, but they are material to permitting feasibility, schedule and cost (Items 15 and 18); the World Heritage interaction should be clarified early.

17.11 References

Greenland Mineral Resources Act (Greenland Parliament Act No. 7 of 7 December 2009, as amended) and the EIA / SIA exploitation-Licence procedures — Government of Greenland (govmin.gl); EAMRA and MLSA.

Uranium Act — Inatsisartut Act No. 20 of 1 December 2021 (prohibition of exploitation of minerals containing more than 100 ppm uranium).

UNESCO World Heritage Centre — Aasivissuit–Nipisat: Inuit Hunting Ground between Ice and Sea (inscribed 2018), Qeqqata municipality, West Greenland.

Albatros Arctic Circle; Destination Arctic Circle — Aasivissuit–Nipisat World Heritage area (extent; caribou ~90,000; muskox ~10,000 introduced 1962).

Greenland Mines Ltd and Neo Performance Materials — public disclosures, May–June 2026 (environmental baseline ongoing; exploitation-Licence documentation not yet submitted).

Greenland Mines Ltd — Sarfartoq environmental and social baseline data and permitting status (to be provided; personal communication, GRML).

ITEM 18 — CAPITAL AND OPERATING COSTS

Summary

- Costs are stated in constant second-quarter 2026 United States dollars and are of AACE International Class 5 accuracy, appropriate to an initial assessment.
- Initial capital of US\$409 million, including a 20% contingency on direct capital.
- Life-of-mine capital of US\$673.0 million, comprising initial capital of US\$409.0 million, underground development capital of US\$138.0 million, sustaining capital of US\$65.5 million, a single tailings storage facility lift of US\$22.5 million and closure of US\$38.0 million.
- Operating cost of US\$103.50 per tonne of run-of-mine feed on a life-of-mine basis, for a life-of-mine operating cost of US\$1,264 million.
- Costs are estimated for the hybrid open-pit and underground operation described in Item 13. No satellite-pit cost is carried, because no satellite mining is scheduled.

Basis of estimate

The capital and operating cost estimates in this Item are of AACE International Class 5 accuracy, consistent with the initial assessment level of study. They are order-of-magnitude estimates suitable for assessing reasonable prospects for eventual economic extraction. They are not feasibility-level estimates and are not a basis for project financing or construction decisions. All costs are in constant second-quarter 2026 United States dollars, exclusive of escalation, interest during construction and financing costs. Because a 20% contingency is carried explicitly within the base estimate, the residual estimate-class accuracy should be read as of the order of –20% to +30% on initial capital around the provisioned point, and must not be read as a second, separate layer of cover for the same risk.

18.1 Capital cost estimate

The life-of-mine capital cost estimate comprises initial construction capital, sustaining capital, one staged lift of the tailings storage facility, initial working capital, and closure and rehabilitation. Direct costs were built from a factored area-by-area estimate rescaled from an earlier 0.7 Mtpa basis to the 1.4 Mtpa design throughput using a capacity power law, with the capacity exponent set per area (approximately 0.70 for size-driven process-plant areas and 0.20–0.50 for semi-fixed infrastructure such as roads, camp, buildings and communications). An Arctic capital premium of 10% is applied to the temperate-equivalent direct cost. Indirect costs and contingency are developed as percentages of total direct capital.

18.1.1 Initial capital

Initial capital is estimated at US\$409 million. The estimate is of AACE International Class 5 accuracy and is built from benchmarked unit rates and factored allowances rather than from quotations or engineered take-offs. It is expressed in constant second-quarter 2026 United States dollars.

Basis of selection

This estimate adopts the Recommended value of each cost element. A first-quartile selection, being the average of the low and recommended values, which produced an initial capital estimate of US\$356 million while the supporting note described the Recommended build. The two were inconsistent, and adopting a below-recommended capital estimate in the reportable case of an initial assessment is not a position the qualified person is prepared to defend. The estimate has been returned to the Recommended basis throughout, which increases initial capital by US\$53 million.

Area	Item	US\$M
Mining	Mine establishment and pre-production (pre-strip, dewatering, in-pit roads)	10.6
Mining	Mining contractor mobilisation and mine facilities	4.2
Processing plant	Crushing circuit	16.3
Processing plant	Grinding circuit	40.6
Processing plant	Flotation circuit	45.5
Processing plant	Concentrate thickening and pressure filtration	11.4
Processing plant	Concentrate bagging plant and storage warehouse	6.3
Processing plant	Plant services	9.8
Tailings	Tailings storage facility, Stage 1	21.1
Infrastructure	Power supply and site distribution	18.5
Infrastructure	Water supply, treatment and pipelines	9.8
Infrastructure	Buildings	11.9
Infrastructure	Accommodation camp	17.2
Infrastructure	Site roads and mine-to-port access road	12.6

Area	Item	US\$M
Infrastructure	Port facilities	14.1
Infrastructure	Fuel storage and distribution	4.2
Infrastructure	Communications and IT	2.3
Infrastructure	Support mobile fleet	5.7
Subtotal — direct capital, temperate-equivalent basis		262.0
Arctic capital premium	10% of temperate-equivalent direct capital	26.2
Total direct capital		288.2

Table 18-1. Direct capital, Recommended basis.

Indirect capital	Basis	US\$M
Engineering, procurement and construction management	10% of direct capital	28.8
Owner's costs	5% of direct capital	14.4
Initial spares	2% of direct capital	5.8
First fills	1% of direct capital	2.9
Commissioning and ramp-up support	2% of direct capital	5.8
Insurance and freight	2% of direct capital	5.8
Subtotal — Indirects excluding contingency	22% of direct capital	63.4
Contingency	20% of direct capital	57.6
Total indirect capital		121.0

Table 18-2. Indirect capital. The commissioning and the insurance-and-freight allowances are each applied at 2% of direct capital, consistent with their stated basis; in an earlier version each was applied at 1% while described as 2%.

18.1.2 Sustaining capital and tailings storage

Sustaining capital is charged at 1.75% of total direct capital per annum in years in which only the open pit is in production, and at 3.5% per annum in years in which underground mining is scheduled, reflecting the higher sustaining requirement of an underground operation. On that basis sustaining capital totals US\$65.5 million over the nine producing years. A single staged

tailings storage facility lift of US\$22.5 million is provided in Year 5. Both figures are taken from the locked financial model and are applied without variation in Item 18, Item 19 and Appendix A.

Outstanding item — Tailings capacity

Tailings storage capacity requires confirmation. The schedule delivers 12.207 million tonnes of mill feed over a nine-year processing life — active open-pit and underground mining in Years 1 to 7 and reclaiming of the deferred low-grade open-pit stockpile in Years 7 to 9 — rather than the 9.022 million tonnes over seven years assumed when the tailings provision was framed. A single staged lift may not be sufficient for the extended schedule. This is an outstanding item for the next study phase.

18.1.3 Closure and rehabilitation capital

Closure and rehabilitation is estimated at US\$38 million on an activity-based allocation and is charged in Year 10, being the year following the cessation of mining in Year 9. Closure is not staged; the whole allowance falls in that single year. That is the year carried in the financial model, and no other closure year is referred to anywhere in this report. Initial working capital of US\$35 million is drawn in the first producing year and released in the final producing year, and is net nil over the life of mine.

18.1.4 Capital summary

Capital element	Timing	US\$M
Initial capital	Year 0	409.0
Underground development capital	Years 1 to 3, US\$46.0M per year	138.0
Sustaining capital	Years 1 to 9; 1.75% of direct capital p.a. in open-pit years, 3.5% in underground years	65.5
Tailings storage facility lift	Year 5, single staged lift	22.5
Closure and rehabilitation	Year 10, the year following the cessation of mining	38.0
Working capital	Drawn Year 1, released Year 9; net nil over the life of mine	—

Capital element	Timing	US\$M
Total life-of-mine capital		673.0

Table 18-3. Life-of-mine capital summary, point estimate. The components sum exactly to the stated total of US\$673.0 million. Working capital is drawn in the first producing year and released in the final producing year and is net nil over the life of mine; it is therefore excluded from the total. Across the reported range at Item 19.6.1 life-of-mine capital is US\$875 million in the Low case and US\$538 million in the High case. These figures are generated by the locked financial model and are used without variation in Item 18, Item 19, the Executive Summary and Appendix A.

18.2 Operating cost estimate

Life-of-mine operating cost averages US\$103.5 per tonne of run-of-mine feed. The average is a weighted average across the schedule: the open-pit and underground mining rates apply to different tonnages and in different years and are not additive.

Cost centre	Unit basis — the tonnage the rate is charged on	US\$/t of that tonnage	Tonnage charged (Mt)
Mining — open pit, pit phase	Per tonne of open-pit ore mined in the pit phase, the rate being an all-in contract rate inclusive of waste movement at the pit-design strip ratio. Waste is not charged separately.	6.00	3.969
Mining — underground	Per tonne of underground ore mined, inclusive of development, backfill and underground services	55.00	4.918
Reclaim and rehandle	Per tonne of deferred low-grade open-pit stockpile reclaimed. Charged in place of a mining rate; the mining and stripping cost of this material is incurred in the pit phase and is not charged twice.	1.50	3.321

Cost centre	Unit basis — the tonnage the rate is charged on	US\$/t of that tonnage	Tonnage charged (Mt)
Processing	Per tonne of ROM mill feed processed	67.50	12.207
General and administration	Per tonne of ROM mill feed processed	9.00	12.207
Logistics	Per tonne of ROM mill feed processed. Covers bagging, storage, mine-to-port haulage, port handling and freight.	2.50	12.207
Total	Weighted average per tonne of ROM mill feed processed	103.5	12.207

Table 18-4. Operating cost by cost centre, with the unit basis stated for every rate. Mining rates are charged on ore mined and are not charged on mill feed; processing, general and administration, and logistics are charged on ROM mill feed processed. Appendix A and Item 19 use these same definitions and figures without variation. Life-of-mine columns are rounded and may not sum exactly.

Unit operating cost varies materially across the life of mine. It is US\$85.00 per tonne in the open-pit years, rises to US\$134.00 per tonne while the underground is in production, and falls to US\$80.50 per tonne in the final years while the deferred low-grade stockpile is being reclaimed, because that material carries only a rehandle charge in place of a mining charge.

Correction

The life-of-mine average operating cost is US\$103.5 per tonne of mill feed. It is a weighted average across the schedule and is not the arithmetic sum of the individual unit rates, because the open-pit and underground mining rates, and was not an average of anything. It has been replaced with the true tonnage-weighted average of US\$103.5 per tonne, computed from the cash flow.

18.3 Reconciliation with the Mineral Resource cut-off basis

The costs used in the cash flow and the costs used to derive the Mineral Resource cut-off grades are the same set. Two cut-off tests are applied, and the distinction between them is material.

Material that must carry its own mining cost is tested against a cut-off derived from the full open-pit-phase operating cost of US\$85.00 per tonne. That gives a marginal cut-off of 0.37% TREO at the assumptions adopted. Material that has already been mined and stockpiled, being the deferred open-pit Inferred Mineral Resource, is tested on an incremental basis, because its mining and stripping costs are incurred in the open-pit phase and are committed by the Indi-

cated ore whether the deferred material is subsequently treated. On that incremental basis, comprising reclaim and rehandle, processing, general and administration and logistics, the cut-off is 0.35% TREO.

All scheduled material clears its applicable cut-off. The open-pit Inferred Mineral Resource at 0.67% TREO clears the incremental cut-off by a factor of approximately 1.9 and clears even the full-cost marginal cut-off. The reconciliation between the cut-off basis and the cash-flow basis is therefore complete and no material is scheduled that could not pay for itself on the basis on which it is reported.

Cut-off Consistency

The costs used in the cash flow and the costs used to derive the cut-off grades applied in the mine schedule are the same set. The reasonable-prospects test underpinning the Mineral Resource statement is the MRE net smelter return cut-off (Item 11.4); the economic test applied in this report is the percentage-TREO cut-off derived from the Item 18 cost estimate. The two are consistent, and the second is the less restrictive. All scheduled material clears its applicable cut-off on both bases.

18.4 Contingency, exclusions and accuracy

A contingency of 20% of direct capital, being US\$57.6 million, is included in the initial capital estimate. The contingency is intended to cover the ordinary development of a Class 5 estimate as engineering definition improves. It is not a management reserve, and it does not cover scope change.

The capital and operating cost estimates have AACE International Class 5 maturity. For S-K 1300 reporting, the project-specific accuracy envelope is approximately –50% to +50%, with contingency of 20% of direct initial capital. This statement applies throughout the report and is subject to confirmation by the responsible QP before filing.

A single accuracy statement

One regulatory accuracy statement is used throughout this report: AACE International Class 5 estimate maturity, a project-specific accuracy envelope of approximately –50% to +50% for capital and operating costs, and contingency of 20% of direct initial capital. The generic AACE ranges in Table 2-1 are contextual and do not define the accuracy claimed under S-K 1300. QP confirmation is required before filing.

The following are excluded from the capital and operating cost estimates: escalation and inflation; financing costs, interest and debt service; taxation other than as modelled in Item 19.5; currency hedging; sunk exploration and study costs; the cost of separation and refining beyond the processing toll embedded in payability; any cost associated with material outside the Mineral Resource; and any allowance for schedule delay.

18.5 Benchmarking

The initial capital estimate has been tested against published estimates for comparable rare-earth projects. The comparison is directional only: the projects differ in scope, climate, currency, throughput and study stage, and none is a like-for-like comparable.

Project	Study / date	Throughput	Scope	Initial capital
Sarfartoq ST1 (this report)	IA, 2026	1.4 Mtpa	Concentrate only, Arctic, open pit then underground	US\$409M
Wicheeda (Defense Metals)	PFS, Feb 2025	1.8 Mtpa	Concentrator plus hydromet/SX	US\$1.4B
Yangibana (Hastings)	FS, 2023	1.1 Mtpa	Concentrate only, arid Western Australia	≈US\$310M
Ngualla (Peak Rare Earths)	BFS	0.8 Mtpa	Flotation concentrate, warm climate	≈US\$287M
Songwe Hill (Mkango)	FS, Mar 2026	0.6 Mtpa	Concentrator plus hydromet	≈US\$298M
Kangankunde Stage 1 (Lindian)	FS, Jul 2024	0.15 Mtpa	Minimal flowsheet, Malawi	US\$40M

Table 18-5. Capital cost benchmarking against rare-earth peers. Directional peer anchors only; not like-for-like quotations.

Projects that include hydrometallurgical processing bracket Sarfartoq from above, and a minimal-flowsheet operation in a benign climate brackets it from below. The concentrate-only comparators at comparable throughput — Yangibana and Ngualla — sit at a capital intensity broadly consistent with the Sarfartoq estimate once the Arctic premium is allowed for. The Qualified Person considers the estimate not unreasonable in order-of-magnitude terms, while noting that the property carries a material location and logistics premium relative to non-Arctic peers.

For future study stages the Qualified Person recommends that the combined allowance for temporary construction, Arctic freight and logistics be disaggregated into separate assumptions for ocean freight, port or barge handling, inland haulage, heavy-lift requirements, construction support, laydown, inventory holdings and weather-related disruption, and that the estimate be

developed from an explicit basis of design covering construction philosophy, degree of modularisation, sealift window constraints, winterisation, camp occupancy, fuel storage capacity, power-plant redundancy and water management.

Operating assumptions should likewise be stated in auditable form, including roster basis, labour source and travel assumptions, fuel consumption, consumables inventory policy, winter maintenance allowances, strategic spares holdings, shipping-season constraints and productivity adjustments for climate and darkness. The closure provision should evolve from a percentage-based allowance to an activity-based model aligned with the Greenland permitting framework.

18.6 Qualified Person's opinion

Qualified Person Opinion 18-1 — Capital and Operating Costs

In my opinion the capital and operating cost estimates presented in this Item are of AACE International Class 5 accuracy and are appropriate to the initial assessment level of study. Initial capital of US\$409 million carries a 20% contingency on direct capital reflecting the greenfield Arctic setting and the early study stage. Total life-of-mine capital, including underground development capital, sustaining capital, the tailings lift and closure, is approximately US\$673 million. Operating cost is estimated at US\$103.50 per tonne of run-of-mine feed on a life-of-mine weighted-average basis, of which processing and underground mining are the principal components, for a life-of-mine operating cost of US\$1,264 million.

The estimates cover the hybrid open-pit and underground operation described in Item 13. No satellite-pit cost is carried, because no such mining is scheduled. I draw particular attention to the underground component: the US\$138 million of development capital and the US\$55.00 per tonne operating rate are benchmark figures selected by reference to comparable mechanised long-hole stoping operations, and neither is supported by site-specific geotechnical investigation, stope design or engineering study. Together they account for approximately US\$416 million of undiscounted expenditure, and they carry materially greater uncertainty than the open-pit and processing estimates. I have not adjusted any cost input to support a target net present value. Subject to advancement to AACE Class 3 through vendor budget pricing of the process plant, marine facility and power solution, underground geotechnical and engineering definition, and confirmation of Arctic construction logistics and labour productivity, I consider the estimates reasonable and fit for the purpose of demonstrating reasonable prospects for eventual economic extraction in an initial assessment. They are not a basis for project financing or construction decisions.

Cautionary statement — initial assessment and Inferred Mineral Resources

This Initial Assessment is preliminary in nature. It includes an economic analysis that is based, in part, on Inferred Mineral Resources. Inferred Mineral Resources are considered too speculative geologically to have the economic considerations applied to them that would enable them to be categorized as Mineral Reserves, and there is no certainty that the results of this Initial Assessment will be realized. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the Sarfartoq ST1 Project.

ITEM 19 — ECONOMIC ANALYSIS

19.1 Basis of reporting

Cautionary statement required by 17 CFR 229.1302(d)(4)(ii)

This Initial Assessment is preliminary in nature and includes Inferred Mineral Resources that are considered too speculative geologically to have modifying factors applied to them that would enable them to be categorized as Mineral Reserves. There is no certainty that the results of this economic analysis will be realized. Inferred Mineral Resources comprise 43.6% of the mill feed scheduled in this analysis by tonnage, and 31.8% of the contained total rare-earth oxide. The results of the economic analysis excluding Inferred Mineral Resources are disclosed with equal prominence at Item 19.6.4 and, in the Executive Summary, at Item 1.12. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property.

Inferred Mineral Resources comprise 43.6% of the mill feed scheduled in this analysis by tonnage, and 31.8% of the contained total rare-earth oxide. The results of the economic analysis excluding Inferred Mineral Resources are disclosed in Item 19.6.3 with equal prominence to the results that include them.

Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property.

This Item presents the economic analysis of the ST1 hybrid mine plan. It is an initial assessment within the meaning of 17 CFR 229.1302(d). It is preliminary, it is founded exclusively on estimated Mineral Resources, and it does not support and must not be read as supporting an estimate of Mineral Reserves.

The economic analysis is the only case described anywhere in this report as the base case. A price scenario at the CIF Europe (Rotterdam) delivered tier is presented separately in Item 19.8. That scenario is a sensitivity analysis on commodity price within the meaning of 17 CFR 229.601(b)(96)(iii)(B)(19)(iii); it is not the base case and no result from it is carried into the headline economics of this report.

Results are reported as ranges. The estimates underlying this analysis are of AACE International Class 5 accuracy. Reporting a single value would convey a precision the underlying estimates do not possess. The construction of the ranges is set out in Item 19.6.1.

19.2 Methodology

The evaluation is a discounted cash-flow analysis on an annual basis in constant second-quarter 2026 United States dollars. No allowance is made for inflation or escalation. The analysis is unlevered: no project financing, interest or debt service is modelled, and the results are therefore returns to total capital rather than to equity.



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 - Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

Year 0 is the construction year and carries initial capital undiscounted. Production begins in Year 1 at 75% of nameplate throughput and reaches nameplate in Year 2. Cash flows are discounted from the end of each period. The reference discount rate is 8% real; results are also reported at 5%, 6%, 10%, 12% and 15% real in Item 19.7.4. Active open-pit and underground mining is scheduled from Years 1 through 7. Deferred low-grade open-pit stockpile is reclaimed and processed in Years 7 through 9. The total scheduled processing life is nine years.

The physical schedule, the delivered tonnes and the delivered head grade are taken directly from the mine production schedule in Item 13.4, with mining recovery and dilution applied there. Metallurgical recovery is applied once, in the revenue calculation, and is not applied a second time anywhere in the model. The reconciliation between the schedule and the cash flow is a control check in the financial model and is nil in every year.

19.3 Principal assumptions

The principal assumptions are set out below. Each is disclosed with its basis, as required by 17 CFR 229.1302(d)(2) in respect of price and by 17 CFR 229.601(b)(96)(iii)(B)(19)(i) in respect of the assumptions generally.

Assumption	Value	Basis
Nameplate throughput	1.4 Mt/a	4,000 t/d at 95% availability
Year 1 ramp-up	75% of nameplate	Item 13.4
Mining recovery	95%	Open-pit and long-hole stoping benchmarks
Mining dilution, at zero grade	5%	Item 13.5; see the qualified person's comment there
Mass pull to concentrate	9.7%	SGS F105 master composite
Metallurgical recovery, TREO	63.6%	SGS F105; the neodymium recovery, adopted because neodymium dominates the revenue basket (Item 10.8)
Basket price, contained TREO	US\$51.88/kg	Distribution-weighted per-oxide deck, Strategic Western basis (Item 16.5 and 16.6)
Processing toll	US\$12.74/kg	Cracking and separation cost plus processor margin, fixed in US\$/kg (Item 16.7.6)
Payability	75.4%	DERIVED as one less the toll divided by the basket, not selected (Item 16.7.6)
Net realised price	US\$39.14/kg	Basket price less the toll

Assumption	Value	Basis
Open-pit mining, pit phase	US\$6.00/t ore	All-in contract rate inclusive of waste at the pit-design strip ratio
Underground mining	US\$55.00/t ore	All-in long-hole stoping contract rate
Stockpile reclaim and rehandle	US\$1.50/t	Deferred low-grade stockpile only (Item 13.4)
Processing	US\$67.50/t feed	Benchmark build, Item 18.2
General and administration	US\$9.00/t feed	Remote operations build at 1.4 Mt/a
Logistics	US\$2.50/t feed	Bagging, storage and mine-to-port haulage
Initial capital	US\$409M	AACE Class 5, Recommended estimate, incl. 20% contingency (Item 18.1)
Sustaining capital	1.75% / 3.5% of direct capital p.a.	Open-pit years / underground years
Closure and rehabilitation	US\$38M	Year following cessation of mining
Ad valorem royalty	5% of gross revenue	Greenland Mineral Resources Act; 5% sales royalty on rare earth elements (Item 3.4)
Sales royalty — surplus royalty	Not applicable	The 15% surplus royalty attaches to gemstone extraction only and does not apply to a rare-earth product; not modelled. See Item 3.4 and Item 19.5
Corporate income tax	25%	Greenland legislation
Depreciation	30% DB plant/equipment/intangibles; 5% SL buildings; 10% SL vessels	Elective statutory maxima confirmed in the BDO Nuuk / NunaLaw opinion of 19 August 2026; asset allocation, election and model implementation pending QP confirmation.
Reference discount rate	8% real	Industry practice for an initial assessment

Table 19-1. Principal assumptions. Every value is carried in the economic assumptions register at Appendix A and has been reconciled to the locked financial model used for this Item, Agricola Sarfartoq ST1 DCF v10 Fiscal Update 19 Aug 2026.xlsx, as of 19 August 2026.

Price assumption and time frame

A note on the time frame for the price assumption, as required by 17 CFR 229.1302(d)(2). The basket price is a long-term assumption expressed in constant second-quarter 2026 dollars. It is not a spot price, and it is not a forecast of price in any particular year. It is intended to represent a price reasonably capable of being realised on average over the nine-year production life of the schedule, on the Strategic Western supply-chain basis described in Item 16.5. The qualified person considers that time frame appropriate because the schedule is short relative to the capital cycle of the rare-earth industry, and because the deposit would be brought into production, if at all, into a market whose structure is in transition.

19.4 Revenue estimate

Revenue is earned on contained total rare-earth oxide in a bulk flotation concentrate sold to a third-party separation facility. The mine plan delivers 12.207 million tonnes of run-of-mine feed at a delivered head grade of 1.2591% TREO, producing 1,184 thousand tonnes of concentrate at an average grade of 8.25% TREO and containing 97,753 tonnes of TREO.

Revenue line	Life of mine (US\$M)
Gross revenue at the basket price	5,071
Less: processing toll (cracking, separation and processor margin)	(1,245)
Net realised revenue	3,826
Less: ad valorem royalty at 5% of gross revenue	(254)
Net revenue	3,572

Table 19-2. Life-of-mine revenue. The toll is deducted as a fixed US\$12.74 per kilogram of contained TREO; the resulting payability of 75.4% is an output of that deduction, not an input.

The royalty benchmark is computed on the basis the opinion of 19 August 2026 confirms for a flotation concentrate sold to an independent buyer, the value of Minerals sold and considered sold is the invoice sales value of the concentrate as sold, net of qualifying freight, and not a notional value of the contained rare-earth oxides. On the reported deterministic case the confirmed benchmark changes nothing, because the Basic Royalty Amount is fully offset by corporate income tax in every year and no royalty is payable. Its effect appears where the royalty binds — the composite Low case and the downside price cases — and those cases have been re-run on the confirmed benchmark, which is worth approximately US\$10 million of after-tax net present value in the Low case and approximately US\$27 million at a 30% fall in the basket price. Excluding Inferred Mineral Resources, the confirmed benchmark removes the US\$1.5 million royalty top-up carried in the previous revision, and the after-tax NPV8 becomes US\$605 million. For CFR/CIF sales, freight to the named port is deducted from the sales price in determining the value of minerals sold; terminal charges, customs clearance and delivery are

stated to be at the buyer's expense, and the split of the modelled logistics line between qualifying freight and buyer-borne charges remains to be confirmed.

Working capital and tax timing

Corporate income tax is assumed to be paid on account within the relevant year so that the 25% rate applies; the 19 August 2026 opinion confirms that, where tax is not paid on account before the end of the fiscal year, it falls due on 20 November of the following year with 6% interest, an effective rate of 26.5%. The same opinion confirms that the Royalty Conversion Amount — corporate income tax together with corporate dividend withholding tax — is taken in respect of each financial year regardless of the time of payment, that is, on an accrual basis. The year-matching implemented in the model is on that basis, so the on-account assumption bears on the rate applied and not on the year to which the Conversion Amount is attributed. No financing facility is modelled for these payments.

19.5 Royalties and taxation

The fiscal-update engine is to model the Payable Royalty mechanism annually. On the interpretation confirmed by the BDO Nuuk / NunaLaw opinion of 19 August 2026, combined annual government take is the greater of (a) 5% of the value of minerals sold and (b) 25% of taxable income before any royalty deduction, after allowing for available tax-loss carry-forward. Royalty is floored at nil and neither royalty nor tax creates a carry against the other. Plant, equipment and intangibles are depreciated at up to 30% diminishing balance; buildings at up to 5% straight-line; and vessels at up to 10% straight-line. Because those are maximum rates, the model must run the maximum-rate and slower early-election schedules and adopt the better supported result, with the asset allocation and election basis disclosed. Dividend tax remains outside the model because the analysis is unlevered and pre-distribution. No surplus royalty is charged: the 19 August 2026 opinion confirms that the surplus royalty applies only to licences carrying permission to extract gemstones. The registrant is preparing an application for pre-approval of tax-loss preservation. This pre-approval process is separate from the approval process for the indirect Licence transfer under Section 69 of the Greenland Mineral Activities Act. No pre-approval has been granted as at the report date.

Fiscal charge	Life of mine (US\$M)
5% value-of-minerals-sold benchmark	252.0
Surplus royalty	0.0
Corporate tax	499.2
Total government take (corporate tax plus royalty top-up)	499.2

Table 19-3. Life-of-mine fiscal charges, base case. Corporate income tax is computed on taxable income after depreciation and loss carry-forward. No surplus royalty is charged, that royalty attaching to gemstone extraction only (Item 3.4).

Fiscal basis — modelled and reconciled.

Annual government take is the greater of the 5% value-of-minerals-sold benchmark and 25% corporate income tax before any royalty deduction, with royalty floored at nil and no carry between years.

The current including-Inferred schedule produces US\$499.2M corporate tax and nil royalty top-up. Surplus royalty is not applicable. Depreciation begins in Year 1 when assets enter service: maximum 30% declining balance for plant/equipment/intangibles and 5% straight line for buildings; no vessel basis is identified. The full US\$2.50/t logistics line is provisionally treated as qualifying freight, and closure is deducted in the year paid into the government escrow account, which is the basis on which the 19 August 2026 The BDO Nuuk/NunaLaw opinion states it is deductible. The asset-class allocation and the eligibility of the logistics line as qualifying freight remain model assumptions pending the confirmations stated in this report.

Status of fiscal implementation. The BDO Nuuk/NunaLaw opinion dated 19 August 2026 confirms the legal framework applied in this Initial Assessment, including the invoice-sales-value basis for the Basic Royalty benchmark, annual accrual treatment of the Royalty Conversion Amount, the non-applicability of the surplus royalty to rare-earth extraction, and the statutory maximum depreciation rates. The allocation of capital between asset classes, the selected depreciation elections and start-of-service timing, and the allocation of the modelled logistics cost between qualifying freight and other charges remain Initial Assessment modelling assumptions. These assumptions have been applied consistently in the financial model.

19.6 Cash flow and economic results

19.6.1 Basis of the reported ranges

The capital and operating cost estimates supporting this analysis are of AACE International Class 5 accuracy, and the price and payability assumptions are drawn from market evidence of varying maturity. The results are therefore reported as a range spanning a Low case, a point estimate and a High case.

Case	Basket price	Operating cost	Capital cost
Low case	–15%	+15%	+30%
Point estimate	as assumed	as assumed	as assumed
High case	+15%	–15%	–20%

Table 19-4. Construction of the reported deterministic cases. The capital factors used in the Low and High cases are scenario inputs within the full approximately –50% to +50% regulatory accuracy envelope; they do not redefine or narrow that overall estimate-accuracy statement.

The Low and High cases are complete re-computations of the cash flow. The annual Payable Royalty, class-specific depreciation, loss carry-forward and corporate income tax are recalculated in each case; the cases are not interpolations of the point estimate. Physicals, schedule, metallurgical recovery and fiscal terms are identical in all three cases. The processing toll is held fixed in dollars per kilogram in every case, so payability moves with the basket price, which is why the downside is more pronounced than a simple proportional change in revenue would suggest.

How the reported range must be read

The Low case is not a worst case, and the High case is not a best case. Each is a coherent combination of the accuracy bounds adopted for this study, applied simultaneously. Outcomes outside the reported range are possible, if the mine plan, the flowsheet, the geological model or the permitting basis proves materially different from that assumed. The range quantifies parameter uncertainty only. It is not a calibrated probability distribution, the cases are not forecasts, targets, projections or valuations. Each Low, Point and High case is a deterministic, internally coherent scenario calculated from the approved financial model.

19.6.2 Economic results

Result	Low case	Point estimate	High case
Life of mine (years)	9	9	9
Mill feed processed (Mt)	12.207	12.207	12.207
Delivered head grade (% TREO)	1.2591	1.2591	1.2591
Contained TREO in concentrate (t)	97,753	97,753	97,753
Life-of-mine operating cost (US\$M)	1,453	1,264	1,074
Life-of-mine capital cost (US\$M)	875	673	538
Pre-tax NPV at 8% real (US\$M)	401	1,257	2,053
Pre-tax internal rate of return (%)	26.4%	68.7%	118.6%
After-tax NPV at 8% real (US\$M)	234	897	1,502

Result	Low case	Point estimate	High case
After-tax internal rate of return (%)	19.4%	53.7%	92.7%
After-tax payback from first production (years)	3.5	1.9	1.2
The Low and High cases are complete recomputation of the cash flow on the 19 August 2026 fiscal engine, at the parameter combinations set out in Table 19-4. They are deterministic scenarios, not percentiles of a probability distribution.			

Table 19-5. Economic results, ST1 hybrid mine plan, including Inferred Mineral Resources. Constant Q2 2026 US\$. Derived entirely from estimated Mineral Resources. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property.

On the current deterministic case the project returns after-tax NPV8 of US\$897 million and after-tax IRR of 53.7%, with payback of 1.9 years from first production. Across the reported range the after-tax NPV8 is US\$234 million in the Low case and US\$1,502 million in the High case, and the after-tax internal rate of return runs from 19.4% to 92.7%. Every case in the range is a complete recomputation of the cash flow through the 19 August 2026 fiscal engine.

The pre-tax cash flow changes sign twice over the fourteen-year evaluation period, because closure and rehabilitation expenditure falls in the year after mining ceases. The internal rates of return quoted above are the economically meaningful roots of those series.

Multiple roots in the internal rate of return

Footnote on the internal rate of return. The pre-tax and after-tax cash flow series each change sign twice over the fourteen-year evaluation period, because closure and rehabilitation expenditure falls in the year after mining ceases. A series with more than one sign change may admit more than one mathematical root, and standard spreadsheet functions return whichever root they converge upon first. The internal rates of return reported in this Item and throughout this report are the economically meaningful roots, being those consistent with the sign and magnitude of the net present value at the reference discount rate. Readers are directed to the net present value at 8% real as the primary measure of value; the internal rate of return is reported as a secondary measure only.

19.6.3 Annual cash flow

Year	Mill feed (kt)	Head grade (% TREO)	Pre-tax cash flow (US\$M)	After-tax cash flow (US\$M)
0	—	—	(409)	(409)
1	1,047	1.499	216	172

Year	Mill feed (kt)	Head grade (% TREO)	Pre-tax cash flow (US\$M)	After-tax cash flow (US\$M)
2	1,396	1.499	351	277
3	1,396	1.499	351	273
4	1,396	1.486	326	258
5	1,396	1.485	296	228
6	1,396	1.485	319	247
7	1,396	1.157	234	182
8	1,396	0.638	104	83
9	1,385	0.638	138	116
10	—	—	(38)	(38)
Total	12,207	1.2591	1,889	1,390

Table 19-6. Annual cash flow, point estimate. Year 10 carries closure and rehabilitation expenditure in the year following the cessation of mining. The fall in head grade from Year 7 reflects the reclaiming of the deferred low-grade open-pit Inferred stockpile described in Item 13.4.

19.6.4 Economic value-attribution case excluding Inferred Mineral Resources; not an alternative mine plan

Of the 12.207 million tonnes of mill feed scheduled in the economic analysis, 43.6% by tonnage is classified as Inferred Mineral Resource and contributes 31.8% of contained TREO.

On the current deterministic point estimate, excluding the Inferred component reduces after-tax NPV8 from US\$897 million to US\$605 million, a reduction of US\$291 million or 32.5%, and shortens the mine life from nine years to six. After-tax IRR falls from 53.7% to 50.2%.

Economic range — current. The composite Low and High cases have been recomputed through the 19 August 2026 fiscal engine on the confirmed invoice-sales-value royalty base and are reported with the point estimate at Item 19.6.2 and Item 19.7.4. The range is a deterministic parameter range constructed as set out in Item 19.6.1. It is not a probability distribution.

The current deterministic point estimate including Inferred Mineral Resources is pre-tax NPV8 of US\$1.257 billion, pre-tax IRR of 68.7%, after-tax NPV8 of US\$897 million and after-tax IRR of 53.7%. The corresponding excluding-Inferred result is pre-tax NPV8 of US\$879 million, pre-tax IRR of 66.0%, after-tax NPV8 of US\$605 million and after-tax IRR of 50.2%. Across the reported deterministic range, the after-tax NPV8 is US\$234 million in the Low case and US\$1,502 million in the High case including Inferred Mineral Resources, and US\$78 million and US\$1,074 million excluding them.

Inferred Mineral Resources comprise 43.6% of scheduled mill feed and contribute 31.8% of contained TREO. This Initial Assessment is preliminary in nature; no Mineral Reserves have

been estimated, Mineral Resources do not have demonstrated economic viability, and there is no certainty that the economic assessment will be realized.

Deterministic range of values

On the current deterministic point estimate, excluding the Inferred component reduces after-tax NPV8 from US\$897 million to US\$605 million, a reduction of US\$291 million or 32.5%, and shortens the mine life from nine years to six. After-tax IRR falls from 53.7% to 50.2%.

On the current deterministic point estimate, excluding the Inferred component reduces after-tax NPV8 from US\$897 million to US\$605 million, a reduction of US\$291 million or 32.5%, and shortens the mine life from nine years to six. After-tax IRR falls from 53.7% to 50.2%.

Current fiscal-update result	Including Inferred Mineral Resources	Excluding Inferred Mineral Resources
Pre-tax NPV at 8% real (US\$M)	1,257	879
Pre-tax internal rate of return (%)	68.7%	66.0%
After-tax NPV at 8% real (US\$M)	897	604
After-tax NPV at 10% real (US\$M)	806	549
After-tax internal rate of return (%)	53.7%	50.2%
After-tax payback (years)	1.9	1.9

Table 19-7. Current deterministic results including and excluding Inferred Mineral Resources. Both cases are based exclusively on estimated Mineral Resources and are presented with equal prominence in accordance with 17 CFR 229.1302(d)(4)(ii). The Low and High cases for both are at Table 19-5 and Tables 19-9 to 19-12.

Qualified Person's Emphasis

The excluding-Inferred case is materially weaker. In the Low case it returns an after-tax net present value of US\$78 million at 8% real, US\$46 million at 10% real and US\$16 million at 12% real, and is negative at 15% real; its after-tax internal rate of return is 13.1%. The qualified person draws particular attention to this. The project as evaluated depends on Inferred Mineral Resources for a

substantial part of its value, and there is no certainty that Inferred Mineral Resources will be upgraded to a higher confidence category by further drilling.

Notwithstanding these preliminary indicators, the absence of Mineral Reserves and the inclusion of Inferred Mineral Resources mean that economic viability has not been demonstrated. This report does not establish, and must not be read as establishing, that the property is economically viable.

Qualified Person Opinion — Range of values

I record that the economic analysis of the property for the purposes of subpart 1300 of Regulation S-K is the deterministic point estimate reported in Item 19.6.2, being an after-tax net present value at 8% real. The Low and High cases are coherent parameter scenarios computed on the same engine, physicals and schedule; they are sensitivity results, not forecasts, targets, valuations or probability-weighted outcomes. The probabilistic simulation carried in earlier revisions has been withdrawn it rested on a distribution set estimated before the corrected schedule, the revised capital estimate and the fiscal update, and it has not been re-estimated. No probabilistic or percentile outcome is reported in this revision.

19.6.5 Estimate accuracy and contingency

For purposes of 17 CFR 229.1302(d)(4)(i), the capital and operating cost estimates have AACE International Class 5 maturity and an adopted project-specific accuracy envelope of approximately -50% to +50%. A contingency of 20% of direct capital is included in the initial capital estimate, below the 25% maximum. This statement is carried throughout the report and must be confirmed by the responsible QP before SEC filing.

19.7 Sensitivity analysis

19.7.1 Purpose and method

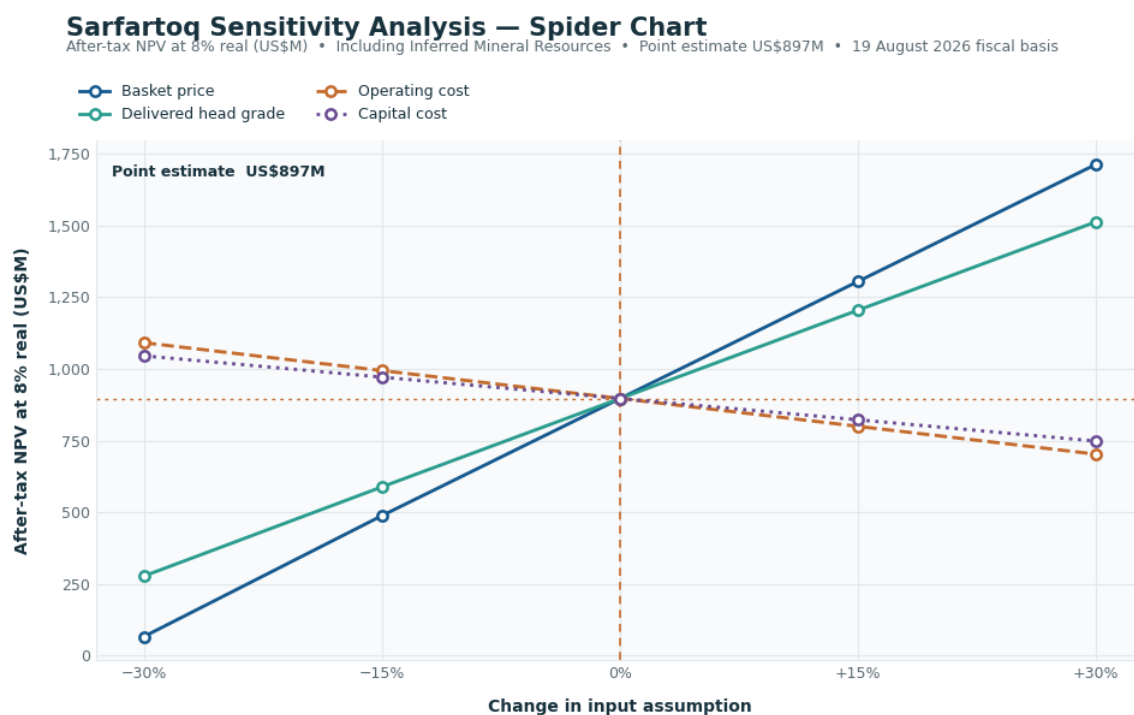
Sensitivity analysis is presented as required by 17 CFR 229.601(b)(96)(iii)(B)(19)(iii). Each case is a complete recomputation of the cash flow in which one variable is scaled and all consequential effects are recalculated, including the annual Payable Royalty, class-specific depreciation, loss carry-forward and corporate income tax. The results are exact, not interpolated.

19.7.2 One-at-a-time results

Variable	-30%	-15%	Point estimate	+15%	+30%
Basket price	65	488	897	1,306	1,715

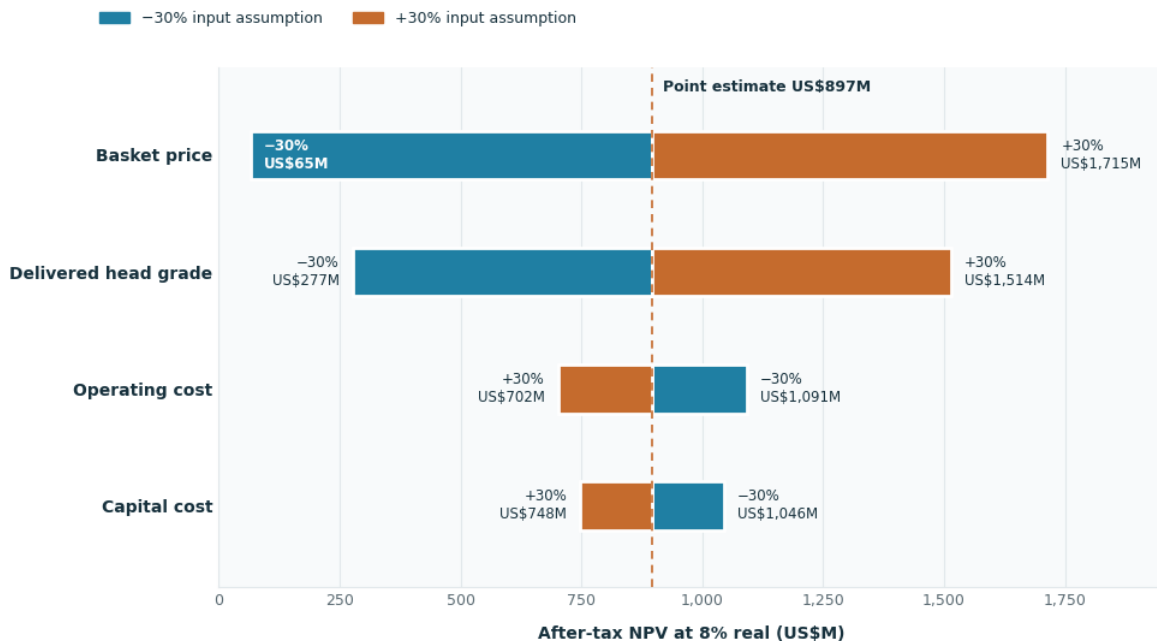
Variable	-30%	-15%	Point estimate	+15%	+30%
Delivered head grade	277	588	897	1,205	1,514
Operating cost	1,091	994	897	799	702
Capital cost	1,046	971	897	822	748

Table 19-8. After-tax net present value at 8% real (US\$M) on one-at-a-time variation about the point estimate.



Sarfartog Sensitivity Analysis — Tornado Chart

After-tax NPV at 8% real (US\$M) • Including Inferred Mineral Resources • Point estimate US\$897M • 19 August 2026 fiscal basis



The spider and tornado charts above plot the one-at-a-time results in Table 19-8, computed on the 19 August 2026 fiscal engine. Basket price is the steepest driver in both directions, and the ordering of the drivers is unchanged from the superseded basis.

19.7.3 Interpretation

The analysis is dominated by revenue. A 30% fall in the basket price removes about 93% of the after-tax net present value, leaving US\$65 million; a 30% increase in capital cost removes about 17% of it. In descending order, the value drivers are basket price, delivered head grade, operating cost and capital cost. That ordering is unchanged by the fiscal update, but the downside is less severe than on the superseded basis, for a reason worth stating: the annual Payable Royalty is fully offset by corporate income tax in the stronger cases and binds only in the weaker ones, so the fiscal update and the confirmed invoice-sales-value royalty base add proportionately more value at the bottom of the range than at the top. On the confirmed base the -30% price case is worth approximately US\$27 million more than it would be on gross basket value, and the Low case approximately US\$10 million more.

Why price and grade differ

Basket price and delivered head grade are not equivalent, and the difference matters. Because the processing toll is fixed in dollars per kilogram of contained TREO, a change in the basket price is borne entirely by the producer: the toll does not fall when the price falls. A change in head grade, by contrast, changes the quantity of contained oxide and therefore changes gross revenue and the toll together, so it moves net revenue proportionally. Basket price is consequently the more powerful

driver of the two. The two are equivalent only where payability is expressed as a fixed percentage of price, which is not the basis adopted in this report.

The practical consequence is that the project is exposed to price on a geared basis. That exposure is the principal commercial risk identified in Item 22.8, and it is the reason the qualified person has derived payability from a cost stack rather than selecting a percentage.

19.7.4 Discount-rate sensitivity

Net present value is reported below at six real discount rates, for each of the three cases described at Item 19.6.1, on both a pre-tax and an after-tax basis. The 8% rows reproduce the results reported at Item 19.6.2 exactly.

Real discount rate	Low — pre-tax	Point — pre-tax	High — pre-tax	Low — after-tax	Point — after-tax	High — after-tax
5%	509	1,459	2,347	322	1,054	1,728
6%	471	1,388	2,243	291	999	1,648
8% (reference rate)	401	1,257	2,053	234	897	1,502
10%	338	1,141	1,884	182	806	1,372
12%	281	1,036	1,733	136	724	1,256
15%	206	899	1,535	75	616	1,104

Table 19-9. Base case — net present value at a range of real discount rates, including Inferred Mineral Resources (US\$M). Low, Point and High cases are given pre-tax and after-tax at every rate. Each case is a deterministic, internally coherent scenario calculated from the approved financial model. The 8% rows reproduce the results at Item 19.6.2 exactly.

Internal rate of return	Low case	Point estimate	High case
Pre-tax	26.4%	68.7%	118.6%
After-tax	19.4%	53.7%	92.7%

Table 19-10. Internal rate of return, including Inferred Mineral Resources. Each series changes sign more than once, and each has exactly one positive root; that root is the figure reported (see the footnote at Item 19.6.2).

Real discount rate	Low — pre-tax	Point — pre-tax	High — pre-tax	Low — after-tax	Point — after-tax	High — after-tax
5%	275	996	1,655	132	697	1,202

Real discount rate	Low — pre-tax	Point — pre-tax	High — pre-tax	Low — after-tax	Point — after-tax	High — after-tax
6%	252	955	1,597	113	665	1,157
8% (reference rate)	209	879	1,489	78	605	1,074
10%	169	809	1,390	46	550	997
12%	133	745	1,299	16	500	927
15%	83	658	1,176	(24)	431	832

Table 19-11. Base case — net present value at a range of real discount rates, EXCLUDING Inferred Mineral Resources (US\$M), disclosed with equal prominence in accordance with 17 CFR 229.1302(d)(4)(ii). Low, Point and High cases are given pre-tax and after-tax at every rate. Each case is a deterministic, internally coherent scenario calculated from the approved financial model.

Internal rate of return	Low case	Point estimate	High case
Pre-tax	21.0%	66.0%	117.5%
After-tax	13.1%	50.2%	90.9%

Table 19-12. Internal rate of return, excluding Inferred Mineral Resources.

Qualified Person's Emphasis

Excluding Inferred Mineral Resources, the Low case returns an after-tax net present value of US\$78 million at 8% real, US\$46 million at 10% real and US\$16 million at 12% real, and turns negative between 12% and 15% real; its after-tax internal rate of return of 13.1% is close to the discount rate a reader would ordinarily apply to a project at this stage. The qualified person draws attention to this as the sharpest statement of the project's dependence on Inferred Mineral Resources.

19.7.5 Payability sensitivity

Because payability is derived from a toll fixed in dollars per kilogram, sensitivity is properly expressed against that toll. The ladder below has been recomputed in full through the 19 August 2026 fiscal engine. The rows at round percentages are computed at those percentages; the shaded row is the payability derived from the toll and is the reported base case.

Payability	Pre-tax NPV8 (US\$M)	Pre-tax IRR	After-tax NPV8 (US\$M)	After-tax IRR
60%	696	45.1%	476	34.8%
65%	878	53.0%	612	41.2%

Payability	Pre-tax NPV8 (US\$M)	Pre-tax IRR	After-tax NPV8 (US\$M)	After-tax IRR
70%	1,060	60.6%	748	47.3%
75%	1,241	68.1%	885	53.2%
75.4% — derived from the toll, adopted in the base case	1,257	68.7%	897	53.7%
80%	1,423	75.3%	1,021	59.0%
85%	1,605	82.5%	1,157	64.7%

Table 19-13. Payability ladder, including Inferred Mineral Resources. Payability is subject to negotiation with offtake counterparties. The rows at round percentages are computed at those percentages; the shaded row is the payability derived from the toll and is the basis of the reported base case. Every row is a complete recomputation of the cash flow through the 19 August 2026 fiscal engine.

Every row of the ladder is a complete recomputation of the cash flow, with the annual Payable Royalty, class-specific depreciation, loss carry-forward and corporate income tax recalculated at that payability. Payability remains a commercial term that has not been quoted by a processor. The ladder is published in full so that a reader can test the adopted point rather than accept it.

The equivalent ladder for the delivered price tier, expressed as a toll ladder because the delivered tier carries its own cost stack, is at Item 19.8.2.

19.8 CIF Europe (Rotterdam) delivered price scenario

Cautionary statements applying to this scenario

This initial assessment is preliminary in nature and includes an economic analysis that is based, in part, on Inferred Mineral Resources. Inferred Mineral Resources are considered too speculative geologically to have modifying factors applied to them that would enable them to be categorised as Mineral Reserves, and there is no certainty that this economic assessment will be realised.

Inferred Mineral Resources comprise 43.6% of the mill feed scheduled in this scenario by tonnage. The results of this scenario excluding Inferred Mineral Resources are disclosed in Table 19-11 with equal prominence to the results that include them.

Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the property.

The capital and operating cost estimates in this scenario are of AACE International Class 5 accuracy, with a contingency of 20% of direct capital.

CIF Europe Rotterdam delivered-price sensitivity scenario. This scenario is a sensitivity analysis using a variant of the commodity price, presented under 17 CFR 229.601(b)(96)(iii)(B)(19)(iii). **It is not the base case.** It applies to exactly the same estimated Mineral Resource, the same mine schedule, the same tonnes and grades, the same metallurgical recovery, the same cut-off grades, the same capital and operating costs, the same flowsheet and the same fiscal terms as the base case, including the removal of the surplus royalty explained at Item 19.5. Only the revenue lines differ. The results of this scenario do not form part of the reported base-case Initial Assessment results and are not to be quoted as the economics of the property.

19.8.1 Basis of the scenario

Since the introduction of export controls, the rare-earth market has separated into tiers. The highest tier is the Western supply chain's own price for separated oxide, qualified and delivered into Europe and assessed on a CIF Rotterdam basis. That tier attracts a delivered premium over the Chinese domestic basis. This scenario evaluates the project at that tier.

The scenario basket price is US\$74.01 per kilogram of contained TREO, computed on the same MRE oxide distribution and the same arithmetic as the base-case basket in Item 16.6, with only the per-oxide prices changed. The base-case basket is US\$51.88 per kilogram, so the scenario basket is 1.43 times the base.

Price sourcing — outstanding item

The per-oxide assessments underlying this scenario must be sourced directly from the price reporting agencies before this report is filed. The financial model carries each price as a flagged input with fields for the series code, publisher, assessment date and specification, and those fields are to be completed from the subscriber price sheets for the chosen effective date.

These figures reached the qualified person by way of a Cantor Fitzgerald initiation note on Critical Metals Corp dated 14 July 2026. That note is subscriber research supporting a Speculative Buy recommendation on a peer developer in Greenland. It is not publicly checkable, it reproduces agency assessments at chart-reading precision, and its author has a commercial interest in the company it covers. It is not an appropriate authority for a price deck in a filed technical report summary and is cited here as corroboration only. No figure in this report rests upon it.

19.8.2 Payability at the delivered tier

No tier borrows another tier's payability. The delivered tier carries its own cost stack, being the cost of cracking and separation and the processor's margin, and that stack is fixed in dollars per kilogram rather than expressed as a percentage of price. A fixed stack against a higher basket mathematically produces a higher payability percentage on a higher realised price, so carrying the base-case payability across into this scenario would be incorrect.

Because the evidence for the delivered-tier cost stack is less mature than for the base-case stack, the ladder below is published in full rather than reduced to a single figure, so that the reader

can see the assumption tested rather than selected. The qualified person has adopted the US\$25.01 per kilogram stack. Where the evidence is uncertain the higher cost stack and the smaller resulting value are preferred.

Toll stack (US\$/kg)	Payability	Realised (US\$/kg)	Pre-tax NPV8 (US\$M)	After-tax NPV8 (US\$M)	After-tax IRR
29.08	60.7%	44.93	1,663	1,201	66.5%
25.01 (adopted)	66.2%	49.00	1,948	1,415	75.1%
21.81	70.5%	52.20	2,173	1,583	81.7%
18.17	75.4%	55.84	2,428	1,774	89.2%

Table 19-14. CIF Europe (Rotterdam) delivered price scenario — payability ladder, including Inferred Mineral Resources. Each row is a complete recomputation of the cash flow.

Toll stack (US\$/kg)	Pre-tax NPV8 (US\$M)	After-tax NPV8 (US\$M)
29.08	1,182	832
25.01 (adopted)	1,394	992
21.81	1,562	1,118
18.17	1,752	1,261

Table 19-15. CIF Europe (Rotterdam) delivered price scenario — results EXCLUDING Inferred Mineral Resources, disclosed with equal prominence in accordance with 17 CFR 229.1302(d)(4)(ii).

The adopted CIF-Europe delivered-tier stack remains a price scenario, not the base case. Its economic outputs and the excluding-Inferred comparison have been recomputed through the 19 August 2026 fiscal engine and are current: on the adopted US\$25.01 per kilogram stack the scenario returns an after-tax NPV8 of US\$1,415 million including Inferred Mineral Resources and US\$992 million excluding them. The per-oxide price assessments underlying the scenario remain to be sourced directly from the price reporting agencies before filing.

Real rate	discount	Pre-tax NPV (US\$M)	After-tax NPV (US\$M)	Excl. Inferred pre-tax (US\$M)	Excl. Inferred after-tax (US\$M)
5%		2,237	1,638	1,558	1,119
6%		2,135	1,559	1,501	1,075
8% (reference rate)		1,948	1,415	1,394	992

Real discount rate	Pre-tax NPV (US\$M)	After-tax NPV (US\$M)	Excl. Inferred pre-tax (US\$M)	Excl. Inferred after-tax (US\$M)
10%	1,782	1,286	1,297	916
12%	1,633	1,171	1,207	846
15%	1,437	1,020	1,085	752
Internal rate of return	95.8%	75.1%	94.0%	72.6%

Table 19-16. CIF Europe Rotterdam delivered-price sensitivity scenario — net present value at a range of real discount rates, on the adopted US\$25.01 per kilogram toll stack. NOT THE BASE CASE. This scenario is a sensitivity analysis on commodity price under 17 CFR 229.601(b)(96)(iii)(B)(19)(iii); its results do not form part of the reported base-case Initial Assessment results and must not be quoted as the economics of the property. Generated from the locked financial model.

Cautionary statement on the persistence of the delivered premium

There is no certainty that the delivered Western premium reflected in CIF Europe assessments will persist. That premium arose in the export-control era and reflects a policy environment, a set of qualification requirements and a supply structure that may not endure over the life of this project. CIF Europe assessments also differ materially between reporting agencies. This scenario is presented to show the effect of the delivered tier on the economics of the property. It is not a forecast, and it is not the base case.

19.9 Limitations of the economic analysis

The following limitations apply to the whole of this Item.

- The analysis is founded exclusively on Mineral Resources, of which 43.6% of the scheduled tonnage is Inferred Mineral Resource. No Mineral Reserves have been estimated. Economic viability has not been demonstrated.
- The estimates are of AACE International Class 5 accuracy. The reported range reflects that accuracy for price and cost only; it does not capture the risk that the mine plan, the flowsheet, the geological model or the permitting basis is materially wrong.
- Mining dilution is modelled at 5% at zero grade and is not differentiated by mining method, although long-hole stoping typically incurs 10% to 20%. Underground material is 4.918 million tonnes of the 12.207 million tonnes scheduled. This is an optimistic assumption, identified in Item 13.5 and quantified at Item 13.3.
- The processing toll underlying payability is bracketed against the lodged accounts and contract disclosures of listed Western rare-earth companies (Items 16.7.6.1 and C.11),

which place the adopted US\$12.74 per kilogram inside an implied Western cracking-and-separation band of roughly US\$11 to US\$17 per kilogram. That evidence brackets the toll but does not quote it, and a processor-sourced range obtained through an offtake counterparty remains outstanding.

- The fiscal terms applicable to an exploitation licence are settled at grant. The BDO Nuuk / NunaLaw opinion of 19 August 2026 confirms that MEL 2020-32 and its related addenda incorporate the Standard Terms and Addendum No. 3 with its Appendix 2, and that those royalty terms carry to the exploitation licence on transition; it does not address any basis on which the Mineral Resources Authority might impose different terms at grant, and that residual discretion remains. This revision applies that opinion on the annual Payable Royalty mechanism, the invoice-sales-value royalty base, the freight deduction, statutory depreciation rates, accrual-basis conversion timing, on-account tax payment, escrow-paid reclamation deductibility and the loss-preservation pre-approval route. The deterministic fiscal schedules have been completed and reconciled. A standalone reliance confirmation from BDO, the asset-class allocation, the eligibility of the freight component, and the loss-preservation permit remain outstanding; the results are model outputs and not a final tax opinion.
- The open-pit restart to reclaim the deferred stockpile assumes no remobilisation cost beyond the rehandle rate and assumes no grade degradation over a stockpile life of approximately five years.
- Tailings storage capacity for the extended 12.207 million tonne schedule requires confirmation; a single staged lift is provided in Year 5.
- The analysis assumes that a third-party separation facility is available on the commercial terms embedded in the toll. No binding offtake or tolling agreement is in place.
- No allowance is made for project financing, working-capital facilities, hedging or currency risk.

19.10 Qualified Person's opinion

In the opinion of the qualified person the economic analysis presented in this Item has been prepared in accordance with 17 CFR 229.1302(d) and 17 CFR 229.601(b)(96)(iii)(B)(19), using methods and assumptions that are appropriate to an initial assessment at this level of study. The analysis is internally consistent: the physicals derive from the mine schedule, the cut-off grades are consistent with the costs used in the cash flow, metallurgical recovery is applied once, and the cash flow reconciles to the schedule in every year.

The qualified person is of the opinion that the results demonstrate that the ST1 hybrid mine plan warrants the further work recommended in Item 23, and in particular the drilling required to upgrade Inferred Mineral Resources to a higher confidence category, the metallurgical and geotechnical work required to support a preliminary feasibility study, and the commercial work required to substantiate the processing toll on which payability depends.

The qualified person emphasises that this report is an initial assessment. It is preliminary, it includes Inferred Mineral Resources in its economic analysis, and it does not and cannot demonstrate economic viability. No Mineral Reserves have been estimated. There is no certainty that the results of this assessment will be realised.

ITEM 20 — ADJACENT PROPERTIES

Adjacent Properties Summary

- No adjacent third-party property of material relevance is known to the QP.
- Other targets within the Licence are not adjacent properties.
- Regional carbonatite analogues are referred to for context only and are not indicative.

The Sarfartoq ST1 Project is located within the Sarfartoq Carbonatite Complex, where several additional rare earth and niobium–tantalum prospects occur within the same exploration Licence. As these prospects are held by the Project and are not adjacent third-party properties, they do not fall within the scope of the adjacent property disclosure requirements under SEC S-K 1300.

The Qualified Person is not aware of any adjacent third-party mineral properties that are considered material to the assessment of the ST1 Zone. Reference is made to other carbonatite-hosted rare earth occurrences in Greenland solely to provide regional geological context and to demonstrate the broader mineral endowment of the province. These deposits have not been independently verified by the Qualified Person and should not be regarded as indicative of the geology, mineralisation, grade or economic potential of the Sarfartoq ST1 Project.

Accordingly, the Qualified Person concludes that there are no adjacent properties that materially influence the geological interpretation, Mineral Resource Estimate or economic assessment presented in this Initial Assessment Report.

20.1 Basis

S-K 1300 requires disclosure of relevant information on properties adjacent to the subject property where such information is material and has been verified by the QP. Information on adjacent properties is not necessarily indicative of the mineralisation on the subject property.

20.2 Adjacent properties

The Sarfartoq project comprises a single exploration Licence (MEL 2020-32) over the Sarfartoq carbonatite complex, in a remote area of West Greenland (Item 3). The other mineralized targets within the complex (ST19, ST24, ST31 and ST40) and the Nukittoq niobium–tantalum prospect lie within the same Licence and are therefore not adjacent third-party properties (Items 6 and 7). The QP is not aware of any adjacent third-party mineral property of material relevance to the ST1 assessment.

20.3 Regional carbonatite context — other carbonatite-hosted rare-earth occurrences in Greenland

This subsection is provided for regional geological context only. None of the occurrences described below is an adjacent property within the meaning of Subpart 1300 of Regulation S-K: none adjoins or is contiguous with MEL 2020-32, and the registrant holds no interest in any of them. The information has been taken from public sources, principally the Geological Survey of Denmark and Greenland (GEUS), has not been verified by the Qualified Person, and is not necessarily indicative of the mineralisation on the Sarfartoq property. A wider comparison of carbonatite-hosted rare-earth deposits internationally, and of the Sarfartoq neodymium–praseodymium distribution against them, is given in Appendix D.

Greenland hosts a small number of carbonatite complexes with recorded rare-earth enrichment. Three of these — Sarfartoq, Qaqarssuk (also written Qeqertaasaq) and Tikiusaaq — lie in West Greenland and intrude the Archaean gneisses of the North Atlantic Craton. A fourth, Grønnedal-Íka, lies in the Mesoproterozoic Gardar Province of South Greenland. Of the four, only Sarfartoq has a Mineral Resource estimated on it

Complex	Location	Age	Setting and host	REE mineralogy	Status
Sarfartoq (this Property)	West Greenland; 50–60 km SW of Kangerlussuaq	c. 564 Ma (Neoproterozoic)	Ring structure and carbonatite dyke swarms in granodioritic gneiss, on the craton–Nagssugtoqidian boundary; extensive fenitisation	Bastnäsite, synchysite, monazite; LREE, Nd–Pr enriched	Mineral Resource estimated (Item 11); subject of this report
Qaqarssuk (Qeqertaasaq)	West Greenland; c. 60 km east of Maniitsoq	Jurassic; reported as c. 165–173 Ma	Carbonatite ring dykes in Archaean gneiss, sövite to rauhaugite, with associated kimberlite dykes and alkaline intrusions	Ancylite (Sr–REE carbonate); LREE-dominated	No Mineral Resource. Reported average 2.4% TREO over a 1.5 km ² area; trench samples to 13.2% TREO (NunaMinerals, 2010)
Tikiusaaq	West Greenland; c. 100 km east-south-east of Nuuk	158 ± 2 Ma (Jurassic)	Dolomite–calcite carbonatite sheets along a ductile shear zone; 3 × 2 km magnetic core	Ancylite; LREE-dominated	No Mineral Resource. Surface and float samples to 9.6% TREO; P ₂ O ₅ to

Complex	Location	Age	Setting and host	REE mineralogy	Status
			within a 14 × 14 km altered area		8.5%. Discovered by GEUS in 2005
Grønnedal-Íka	South Greenland; near Ivittuut	c. 1300 Ma (earliest Gardar)	Layered nepheline syenite, c. 8 × 3 km, intruded by a central calcite–siderite carbonatite plug	Cerium-enriched radioactive dykes radiating from the complex	No Mineral Resource. Assessed by GEUS as a prospective tract

Table 20-1. Carbonatite complexes in Greenland with recorded rare-earth enrichment. Compiled from public sources, principally GEUS (2018) and Paulick et al. (2015). Not verified by the Qualified Person. Grades quoted are from surface, float or trench sampling except where a Mineral Resource is stated.

Comparison with the Sarfartoq ST1 deposit

Sarfartoq is the only carbonatite complex in Greenland on which a Mineral Resource has been estimated, and it is at a materially more advanced stage of exploration than the others. Qaqarsuk and Tikiusaaq have been tested principally by surface mapping, geophysics and selective sampling; neither has been drilled to a density capable of supporting a Mineral Resource, and the high grades reported from each are from surface, float or trench samples, which are selective by nature and are not representative of any mineralized body. Grønnedal-Íka has been assessed as a prospective tract but no rare-earth resource has been defined on it.

Two differences are material to the read-across. The first is mineralogy: rare earths at Qaqarsuk and Tikiusaaq are reported to be hosted principally in ancylite, a strontium–rare-earth carbonate, whereas Sarfartoq mineralisation is hosted in bastnäsite, synchysite and monazite. The beneficiation and downstream processing behavior of an ancylite-dominated feed cannot be assumed to resemble that of the Sarfartoq flowsheet described in Items 10 and 14, and no metallurgical read-across between them is available or implied. The second is the rare-earth distribution within TREO. The reported distributions for Qaqarssuk and Tikiusaaq are more strongly weighted to cerium and lanthanum than Sarfartoq, and correspondingly lower in the magnet rare earths neodymium and praseodymium on which the economics of this Project depend. Those distributions are drawn from different sources, of different vintages and from different sample types, and are not directly comparable with the drill-defined distribution reported for Sarfartoq in Item 11.

The Qualified Person draws no conclusion from these occurrences as to the grade, continuity, metallurgical behavior or economic potential of the Sarfartoq ST1 deposit. They are referred

to solely to establish that carbonatite-hosted rare-earth mineralisation is a recognized and recurring feature of the Greenland geological record, and that the Sarfartoq Carbonatite Complex sits within a province in which such systems are known.

Distinction from the Gardar alkaline rare-earth deposits

The rare-earth deposits most associated with Greenland in public commentary — Kvanefjeld (Kuannersuit) and Killavaat Alannguat Tanbreez (Kringlerne) in the Ilímaussaq Intrusion, and Motzfeldt Sø in the Igaliko Nepheline Syenite Complex — are not carbonatites. They are agpaitic and peralkaline alkaline intrusions of the Mesoproterozoic Gardar Province, in which rare earths are hosted in steenstrupine, eudialyte and pyrochlore respectively. Their host rocks, rare-earth mineralogy, deleterious-element profiles and processing routes differ fundamentally from those of a carbonatite, and they are not geological or metallurgical analogues for Sarfartoq. The Karrat (Niaqornakassak and Umiammakku Nunaa) occurrences in central West Greenland are hosted in Palaeoproterozoic amphibolite, and the Milne Land occurrence in East Greenland is a Mesozoic palaeoplacer; neither is a carbonatite system. This distinction is drawn because those projects are frequently cited as Greenland rare-earth comparators, and their technical and permitting characteristics should not be read across to this Project.

Cautionary statement — regional context and third-party information

The occurrences and deposits described in this subsection are separate properties in which the registrant has no interest. None is an adjacent property for the purposes of Subpart 1300 of Regulation S-K, and none adjoins or is contiguous with Mineral Exploration Licence MEL 2020-32.

Information concerning these properties has been taken from public sources and has not been independently verified by the Qualified Person. It is not necessarily indicative of the mineralisation, grade, continuity, metallurgical performance or economic outcomes of the Sarfartoq ST1 Project. No inference should be drawn that the Sarfartoq Project will achieve the exploration results, development status or operating outcomes of any occurrence or deposit referred to.

No Mineral Resource or Mineral Reserve has been estimated for the Qaqarssuk, Tikiusaaq or Grønnedal-Íka complexes. Grades quoted for those complexes are derived from surface, float or trench samples, which are selective by nature, are not representative of any mineralized body, and must not be reported or relied upon as Mineral Resources. Historical estimates referred to are not compliant with Subpart 1300 of Regulation S-K, have not been reported by a Qualified Person, and should not be relied upon.

ITEM 21 — OTHER RELEVANT DATA AND INFORMATION

21.1 Exploration potential and value-enhancement pathways

21.1.1 Purpose and status

This Item describes exploration potential on the Licence that lies outside the Mineral Resource reported in Item 11, together with technical and commercial pathways that may in future enhance the value of the property. It is included because the Qualified Person considers the information material to an understanding of the property. It is exploration information only.

None of the material described in this Item is a Mineral Resource. None of it is scheduled in the mine plan in Item 13, costed in Item 18, or reflected in the economic analysis in Item 19. It is not additive to the Mineral Resource statement in Item 11.

Cautionary statement — exploration information

The potential quantity and grade of the exploration targets described in this report is conceptual in nature. There has been insufficient exploration to estimate a Mineral Resource, and it is uncertain whether further exploration will result in the estimation of a Mineral Resource. This information is exploration information only. It is not a Mineral Resource, it is not a Mineral Reserve, it must not be reported or relied upon as either, and it forms no part of the Mineral Resource estimate in Item 11 or of the economic analysis in Item 19.

21.1.2 The ST40 occurrence and the ST1–ST40 corridor

The ST40 occurrence lies within the Licence approximately 4 km from the ST1 zone and is the most advanced of the satellite carbonatite occurrences. Surface sampling and historic drill intercepts indicate rare-earth mineralisation of higher tenor than the ST1 average. The corridor between ST1 and ST40 is interpreted from geophysics and mapping as a continuation of the same outer ring-structure dyke swarm and has not been systematically drill-tested. An exploration target has been stated for ST40; it is set out, with the disclosure required by § 229.1302(c), in Item 21.2 below.

The Qualified Person records the following limitations on the ST40 information. No block model has been constructed, and no Mineral Resource has been estimated. No cut-off grade has been applied, and no classification of confidence has been assigned. The metallurgical response of ST40 material, which is barite-bearing, to the flotation flowsheet described in Item 14 has not been tested; given the mineralogical variability already observed between ST1 composites, a comparable response cannot be assumed. No geotechnical, hydrogeological, pit-optimisation or haulage study has been undertaken for any satellite pit, and the haulage solution to the ST1 plant is unquantified.

21.1.3 Potential beneath the base of the underground component of the hybrid Mineral Resource

Drilling at ST1 demonstrates that mineralisation continues below the base of the optimized open-pit shell used to constrain the open-pit component of the Mineral Resource. The MRE also reports a stand-alone underground scenario of 7.475 Mt of Indicated and 2.603 Mt of Inferred Mineral Resource, optimized with stope shapes clipped to the topographic surface and without an exclusion zone at the interface. That inventory extends from surface downward and overlaps the open pit; it is an alternative treatment of the same mineralized body rather than an additional inventory beneath it, and it is not used in this report. The hybrid scenario adopted here places the underground stope shapes wholly beneath the base of the optimized pit shell, with a 20 m exclusion zone at the interface, and the resulting underground component — 2.918 Mt of Indicated at 1.64% TREO and 2.012 Mt of Inferred at 1.45% TREO, net of the exclusion zone — is reported in Item 11 and is scheduled in the hybrid mine plan evaluated in Item 19. It is Mineral Resource, not exploration information.

The consequence is that the volume that remains outside the Mineral Resource is the volume lying beneath the base of the underground component of the hybrid scenario, not the volume beneath the pit floor. Establishing whether an economically interesting inventory exists in that deeper position requires further drilling below the lowest scheduled stope horizon, followed by estimation and classification under subpart 1300 of Regulation S-K by the Qualified Person responsible for the Mineral Resource Estimate. That work has not been undertaken.

An exploration target has been stated for the volume beneath the base of the underground component of the hybrid Mineral Resource; it is set out, with the disclosure required by § 229.1302(c), in Item 21.2 below. Until that target is drilled, estimated and classified it cannot be scheduled, and no part of it is scheduled in the mine plan in Item 13 or valued in Item 19. The underground mine plan presented in this report is drawn wholly from the estimated Mineral Resource.

21.1.4 Other carbonatite occurrences

Five further carbonatite-hosted rare-earth occurrences have been identified within the Licence — ST19, ST24, ST31, ST37 and ST43 — together with the niobium-bearing zones described in Item 6.6. All are at a reconnaissance stage. No Mineral Resource has been estimated for any of them, and the information available is insufficient to define an exploration target for any of them.

21.1.5 Niobium and phosphate by-product potential

The Sarfartoq Carbonatite Complex hosts historically reported niobium mineralisation, and the ST1 flotation concentrate carries substantial apatite. Neither niobium nor phosphate is credited in the economic analysis in Item 19. Establishing whether either could contribute value would require mineralogical and metallurgical work to determine whether a saleable product can be recovered without prejudicing rare-earth recovery, followed by market and cost assessment. No such work has been undertaken.

21.1.6 Heavy rare-earth distribution

Terbium and dysprosium together contribute approximately 8% of the in-concentrate basket value despite constituting less than 0.3% of the TREO distribution. Any zone of the deposit carrying an enriched heavy rare-earth distribution would therefore carry disproportionate value. Systematic characterisation of the spatial variation in rare-earth distribution across the deposit has not been undertaken and is recommended.

21.1.7 Metallurgical and process optimization

The adopted metallurgical basis — a mass pull of 9.7% at a TREO recovery of 63.6%, producing a concentrate grading approximately 8.25% TREO on the hybrid feed — is drawn from bench-scale testwork on two composites. The rougher and scavenger stages achieved recoveries of the order of 75 to 78%, materially above the cleaner-circuit result, which indicates that cleaner-circuit optimization, regrind and reagent-scheme development may recover additional value. Improvement in either recovery or concentrate grade acts directly on revenue, to which the result is most sensitive (Item 19.7).

21.1.8 Commercial and offtake optimization

The adopted payability of 75.4% of contained basket value is a reasonable assumption for an initial assessment but has not been tested in a term offtake negotiation. Payability for rare-earth concentrates is negotiated case by case and is sensitive to concentrate grade, deleterious content and the counterparty's processing configuration. Improvement in concentrate grade would be expected to improve payability. Western supply-chain security considerations may also support terms more favourable than those assumed.

21.1.9 On-site conversion to a mixed rare earth carbonate

Payability for a rare-earth flotation concentrate is materially lower than for a mixed rare earth carbonate, because the buyer of a concentrate must perform the cracking and leaching step (Item 16.7). The question therefore arises whether the registrant should perform that step on site and sell the carbonate instead, capturing the difference. The Qualified Person has evaluated it.

Cost of the conversion step

No site-specific estimate exists. The following benchmarks have been normalised to the 135,460 tonnes per annum of concentrate that the plant described in Item 14 would produce at nameplate throughput (Table 14-4).

Benchmark study	Disclosed scope	Implied for Sarfartoq
Arafura Nolans, extraction plant	A\$284M at 300 ktpa concentrate	≈US\$85M

Benchmark study	Disclosed scope	Implied for Sarfartoq
Ashram, Saguenay refinery	C\$358M at 69.5 ktpa concentrate	≈US\$510M
Ngualla Teesside refinery, 2017 (includes separation)	US\$160M at 28.3 ktpa concentrate	≈US\$770M
Wicheeda, PFS 2025 (includes solvent extraction)	US\$614M at 80.4 ktpa concentrate	≈US\$1,040M

Table 21-1. Capital cost of the conversion step normalised on a concentrate-mass basis. For calibration, the Lynas cracking and leaching facility at Kalgoorlie was sanctioned at approximately A\$500 million and last reported at approximately A\$800 million.

Disclosed operating costs for the step cluster between approximately US\$400 and US\$1,050 per tonne of concentrate treated across five independent studies, which for Sarfartoq is of the order of US\$55 million to US\$145 million per annum, or approximately US\$4 to US\$10.50 per kilogram of contained TREO. The closest grade analogue, Songwe Hill at 11.6% TREO concentrate, discloses US\$13.8 per kilogram of TREO over life of mine.

Result of the evaluation

On-site conversion does not add value at any combination of those benchmarks. Modelled at an 85 per cent payability of contained basket value and 90% hydrometallurgical recovery, the configuration returns a lower after-tax net present value than selling the concentrate in every case examined, before any allowance for the capital cost of the conversion plant. Once that capital is allowed for at the benchmark range in Table 21-1 the configuration is value-destructive throughout. These cases are carried from a side-model computed on a fiscal basis that included a surplus royalty which does not apply to this project; correcting that basis raises both the concentrate case and the conversion cases and does not alter the ranking. The step is not adopted, and no allowance for it is carried in Item 18.

Why the step does not pay at Sarfartoq

Concentrate grade. A hydrometallurgical plant is sized by the mass it treats, not by the metal it recovers. The concentrate contemplated here grades approximately 9.6% TREO, so the plant would handle approximately 135 thousand tonnes of material in a full production year to recover approximately 13.2 thousand tonnes of contained TREO. Comparable projects convert concentrates grading 30% to 50% TREO and therefore build a much smaller plant for each unit of metal.

Gangue chemistry. The concentrate carries approximately 42% apatite and 34% carbonate (Item 10). Both are acid-consuming, and published disclosure indicates that projects actively mine around such gangue for that reason. Where the rare earths are apatite-hosted, as at Nolans,

an additional pre-leach circuit has been required ahead of the acid bake, and the resulting extraction plant is several times the cost of the beneficiation plant it follows. No acid-consumption testwork has been undertaken on Sarfartoq concentrate.

QP Opinion — On-site conversion to a mixed rare earth carbonate

In my opinion on-site conversion of the Sarfartoq concentrate to a mixed rare earth carbonate is not economically supportable at the concentrate grade contemplated, and I have not adopted it. The concentrate-only flowsheet described in Item 14 is, in my opinion, the correct configuration for this property.

I draw attention to the consequence for Item 16.7. The reason the conversion step does not pay is the same reason that payability for this product is constrained: the concentrate is of low grade, and both the cost of converting it and the terms a buyer will offer for it follow from that fact. A configuration that sells a flotation concentrate should be expected to receive the payability applicable to a flotation concentrate.

I recommend that this conclusion be revisited if the metallurgical optimisation described in Item 21.1.7 materially raises the concentrate grade, since the economics of the conversion step improve rapidly with grade, and if a site-specific conversion cost estimate and acid-consumption testwork become available.

21.1.10 Infrastructure, power and logistics alternatives

Power supply, the mine-to-port haulage solution and the sealift schedule are the principal infrastructure variables. A hydro grid connection or hybrid renewable solution is assumed; a diesel-generation case would add of the order of US\$8 to 15 million to direct capital together with larger fuel storage and materially higher operating cost. Definition of these options is a priority for the next study stage.

21.1.11 Resource classification upgrade

Approximately 43.6% of the tonnage scheduled in the mine plan, contributing 31.8% of the contained TREO, is Inferred Mineral Resource, of which 27.2 percentage points is open-pit Inferred Mineral Resource and 16.4 percentage points is underground. The classification history and basis of the current Hybrid estimate are summarized at Item 11.7.1.

Targeted infill drilling is intended to increase drill density in selected priority areas and support a future resource-classification review. If supported by the resulting information and the responsible Qualified Person's subsequent estimation and classification, some Inferred Mineral Resource may be upgraded to Indicated Mineral Resource.

The Inferred material now scheduled is of materially higher grade than the Inferred material scheduled — 1.45% TREO for the underground Inferred material against 0.67% TREO for the open-pit Inferred material, which is stockpiled during the open-pit phase and reclaimed to the mill last (Item 13.4.1).

21.1.12 Summary of potential future work

Pathway	Nature of the opportunity	Work required before it could be relied upon
ST40 and the ST1–ST40 corridor	Potential higher-grade feed source; potential mine-life extension	Drilling, block modelling, Mineral Resource estimation and classification, metallurgical testwork, geotechnical and haulage study
Volume beneath the re-cut underground inventory	Potential further mine-life extension by deeper underground mining	Drilling below the lowest scheduled stope horizon; Mineral Resource estimation and classification; extension of the underground geotechnical and mine design study
Underground geotechnical and stope design	Confirmation of the underground mining rate and dilution assumed in Item 19	Geotechnical drilling and characterisation, method confirmation, stope and pillar design, backfill, ventilation and dewatering study for Arctic conditions
Other carbonatite occurrences	Potential additional resources	Reconnaissance drilling and geochemistry sufficient to define an exploration target
Niobium and phosphate by-products	Potential additional revenue	Mineralogical and metallurgical testwork; product specification; market assessment
Heavy rare-earth distribution	Potential higher basket value	Systematic characterisation of rare-earth distribution across the deposit
Metallurgical optimization	Potential higher recovery and concentrate grade	Locked-cycle, variability and pilot-scale testwork; cleaner-circuit and reagent optimization
Offtake and payability	Potential higher net realised price	Term offtake negotiation supported by pilot-scale concentrate samples

Pathway	Nature of the opportunity	Work required before it could be relied upon
Resource classification upgrade	Reduced reliance on Inferred Mineral Resource	Targeted infill drilling in selected priority underground and lower-confidence-margin areas, followed by future estimation and resource-classification review by the responsible Mineral Resource Qualified Person; see Item 11.7.1.

Table 21-2. Exploration potential and value-enhancement pathways. None of these pathways is included in the mine plan, the cost estimates or the economic analysis in this report.

21.2 Exploration target — cross-reference

An exploration target has been stated for the ST40 occurrence and for the ground beneath the base of the underground component of the hybrid Mineral Resource. It is disclosed in full at Item 7.10.

Item 7.10 is the single separately captioned section contemplated by 17 CFR 229.1302(c)(2). It carries the ranges of tonnage and grade, the four cautionary statements required by paragraphs (c)(2)(i) to (iv) and the four content requirements at paragraphs (c)(3)(i) to (iv). The disclosure is not repeated here, and no tonnage, grade or quantity for the exploration target is stated in this Item.

The exploration target is conceptual

The exploration target does not represent, and should not be construed to be, an estimate of a Mineral Resource or a Mineral Reserve. There has been insufficient exploration to estimate a Mineral Resource, and it is uncertain whether further exploration will result in the target being delineated as a Mineral Resource. No economic value of any kind is attached to it anywhere in this report.

21.3 The registrant's conceptual long-life development scenario

The registrant has described a conceptual long-life development scenario that would combine the ST1 Mineral Resource with material from the ST40 occurrence and from beneath the base of the underground component of the hybrid Mineral Resource. That scenario is described here for completeness because the registrant has referred to it publicly.

Status of the conceptual scenario under subpart 1300 of Regulation S-K

No economic analysis of the conceptual scenario appears in this report. No net present value, internal rate of return, payback period or other measure of economic value is attached to the ST40 occurrence, to the material beneath the ST1 pit shell, or to any combination of them with the ST1 Mineral Resource,

and no figure derived from that scenario enters the headline economics of this report or its Executive Summary.

The material in question is an exploration target. It is not a Mineral Resource, and it is not a Mineral Reserve. Attaching an estimate of value to it would be inconsistent with 17 CFR 229.1302(c)(2)(iv). The exploration target is presented in Item 21.2 as ranges of tonnage and grade only, with the cautionary statements required by 17 CFR 229.1302(c)(2)(i) to (iv).

No probability-weighted net present value outcome is presented for any conversion scenario combining these sources. Any such outcome would be withdrawn in their entirety. They rested on conversion probabilities that are not supported by an estimate prepared to the standard of subpart 1300, and their presentation alongside the economic analysis of the Mineral Resource risked conveying that value had been attributed to material that is not a Mineral Resource.

One correction of substance is carried forward, and it is stated against the issued Mineral Resource Estimate. The conceptual inventory beneath the pit shell is reduced from 10.55 million tonnes to 5.484 million tonnes because the difference of 5.066 million tonnes is now estimated as Underground Mineral Resource in the Mineral Resource Estimate effective 31 July 2026 and issued for use 16 August 2026 (Item 11, Table 11-2a, and the memorandum line for the underground inventory before the exclusion zone). From that Mineral Resource, 4.918 million tonnes is scheduled as mill feed in the mine plan evaluated in Item 19 once the 20 m exclusion zone and the resource-to-ROM mine-capture factor are applied. The 5.484 million tonnes that remains in this Item is conceptual material for which no Mineral Resource has been estimated and to which no economic value is attached. No tonne is counted both as Mineral Resource and as conceptual material.

The qualified person notes that the levers capable of changing the economics of the estimated Mineral Resource itself — commodity price, metallurgical recovery, payability and discount rate — are quantified in Item 19 and its sensitivity analysis, where they properly belong. The levers described in this Item require either new rock or third-party action, and no economics are attached to them here.

ITEM 22 — INTERPRETATION AND CONCLUSIONS

Summary

- The Sarfartoq ST1 property hosts an estimated Hybrid Mineral Resource of 6.900 Mt of Indicated Mineral Resources at 1.60% TREO and 5.341 Mt of Inferred Mineral Resources at 0.96% TREO, totalling 12.240 Mt at 1.32% TREO, in spatially exclusive and additive open-pit and underground components, of sufficient size and grade to support an initial assessment.
- The initial assessment, founded exclusively on that Mineral Resource and evaluating a hybrid open-pit-then-underground mine plan over nine years, returns positive preliminary economic indicators.
- No Mineral Reserve has been estimated, and economic viability has not been demonstrated.

22.1 Basis

The conclusions in this Item are drawn from the data, analysis and opinions set out in Items 1 to 21 of this report and are subject to the reliance and limitation statements in Items 2 and 25.

22.2 Geology and Mineral Resource

The ST1 zone is a carbonatite-hosted rare-earth deposit within the Sarfartoq Carbonatite Complex, hosted in subvertical ferrocarnatite dyke swarms of the outer ring structure. The geological model is supported by 94 diamond drill holes for 23,094 m, by mapping and geophysics, and by mineralogical study. An Indicated and Inferred Mineral Resource has been estimated using conventional and defensible methods.

The rare-earth distribution is notably favourable, with neodymium and praseodymium together constituting approximately 25% of TREO, which is high among carbonatite-hosted deposits and is the principal reason the property is of interest despite a modest TREO grade. No Measured Mineral Resource has been estimated. Following the re-cut of the underground estimate to stope shapes lying wholly beneath the base of the optimized pit shell, with an exclusion zone at the interface, the open-pit and underground components of the Mineral Resource are spatially exclusive and are additive; they are reported and scheduled on that basis.

The Qualified Person records that the signed documentation of that re-cut from the Mineral Resource Qualified Person must be placed on file, since the additivity of the two components depends upon it.

22.3 Data and verification

The sampling, preparation, analytical and security protocols applied are appropriate to the deposit type and adequate for the estimation of a Mineral Resource. Quality-assurance and quality-control data for the 2023 programme have been reviewed and are satisfactory (Appendix F). The Qualified Person's independent verification programme, including a site inspection and a database and re-assay check, is not complete. In the Qualified Person's opinion, the outstanding items do not materially affect the conclusions of this report, but they must be completed before a Mineral Reserve could be contemplated.

22.4 Metallurgy and processing

Bench-scale testwork demonstrates that conventional flotation is an effective beneficiation route. The adopted design basis — a mass pull of 9.7% at a TREO recovery of 63.6%, producing a concentrate grading 8.25% TREO on a delivered head grade of 1.2591% TREO — is internally consistent and reconciles to the annualised mass balance, which delivers 875.2 kt of concentrate containing 97,753 t of TREO over the life of mine. The testwork is bench-scale and rests on two composites; locked-cycle, variability and pilot-scale testing are required before a pre-feasibility study, including testing of composites representative of the underground feed. The rougher and scavenger recoveries achieved indicate scope for improvement through cleaner-circuit optimization.

22.5 Market

The property would produce a mixed rare-earth flotation concentrate for sale to a third-party separation facility. The adopted basket price of US\$51.88/kg contained TREO and derived payability of 75.4% give a net realised price of US\$39.14/kg. Payability remains a principal commercial uncertainty because it is derived from a processing toll bracketed against Western producers' lodged accounts and is not yet quoted by a processor. The payability sensitivities have been recomputed on the 19 August 2026 fiscal schedule and are set out at Table 19-13.

22.6 Costs and economics

Initial capital is estimated at US\$409 million on an AACE International Class 5 basis, being the Recommended estimate of the cost build rather than a first-quartile selection from it, with a contingency of 20% of direct capital. Life-of-mine operating cost averages US\$103.5 per tonne of run-of-mine feed, ranging from US\$85 per tonne in open-pit years to US\$134 per tonne while the underground is in production and falling to US\$81 per tonne while the deferred low-grade stockpile is being reclaimed.

The deterministic including- and excluding-Inferred results, the composite Low and High cases and every sensitivity in this report have been computed on the 19 August 2026 fiscal schedule, on the royalty base confirmed by the opinion of that date. The current including-Inferred result is pre-tax NPV8 of US\$1.257 billion and after-tax NPV8 of US\$897 million; the corresponding excluding-Inferred values are US\$879 million and US\$605 million. Across the reported range the after-tax NPV8 is US\$234 million to US\$1,502 million including Inferred Mineral Resources. The probabilistic simulation carried in earlier revisions has been withdrawn and no

percentile outcome is reported. The BDO Nuuk / NunaLaw opinion of 19 August 2026 has been received and applied; a standalone reliance confirmation from BDO and the identified tax assumptions remain completion items. No Mineral Reserve has been estimated, and economic viability has not been demonstrated.

Three features of that result require emphasis. First, the analysis is unusually sensitive to the realised rare-earth price because payability is derived from a processing toll that is fixed in dollars per kilogram: a fall in the basket price is absorbed entirely by the producer, so a 30% fall in the basket removes essentially all the net present value. Second, 43.6% of the scheduled mill feed by tonnage is Inferred Mineral Resource, which is a substantial proportion and is the principal reason the analysis cannot support a Mineral Reserve. Third, in the Low case the result excluding Inferred Mineral Resources is close to break even at 8% real and is negative at 10% real, which is a material observation for a project of this stage.

No Mineral Reserves have been estimated, and economic viability has not been demonstrated. The results above are preliminary and must not be read as establishing that the property is economically viable.

22.7 Infrastructure, environment and title

Regional infrastructure is favourable by the standards of Arctic projects. Site infrastructure remains conceptual and is a principal source of capital-cost uncertainty. No material environmental constraint has been identified from the information reviewed; however, the environmental and social impact assessments have not been undertaken, baseline studies remain incomplete and an Exploitation Licence has not been applied for. Uranium concentrations reported to date are below the threshold of the Greenland Uranium Act. The Licence is held by a third party and its transfer to the registrant remains subject to Government of Greenland approval. Until that approval is obtained the registrant does not hold the property.

22.8 Principal risks and uncertainties

Risk	Nature	Potential effect
Title and Licence transfer	Transfer of MEL 2020-32 to the registrant requires Government approval that has not been obtained	The registrant may not acquire the property
Mineral Resource confirmation	The Qualified Person's independent verification programme and site inspection are incomplete, and the signed hybrid optimization model and volumetric reconciliation between the open-pit and underground components are outstanding	The Mineral Resource may be revised; the component split used in the mine schedule depends on that reconciliation

Risk	Nature	Potential effect
Inferred Mineral Resource	Approximately 43.6% of scheduled tonnage, contributing 31.8% of contained TREO, is Inferred and cannot support a Mineral Reserve; of which 27.2 percentage points is open-pit Inferred Mineral Resource and 16.4 percentage points is underground	Excluding Inferred reduces after-tax NPV8 by US\$293M and after-tax IRR from 53.7% to 50.2%. The classification history and current Hybrid allocation are summarized at Item 11.7.1.
Metallurgical performance	Recovery and concentrate grade rest on bench-scale work on two composites; variability untested and no composite is representative of underground feed	Revenue is directly proportional to recovery
Payability	75.4% derived from the processing toll; the toll is bracketed against public filings but not yet quoted by a processor	The ladder has been recomputed in full: after-tax NPV8 runs from US\$476 million at 60% payability to US\$1,157 million at 85% (Table 19-13)
Commodity price	Rare-earth prices are volatile and thinly traded outside China	Price sensitivity is material and is quantified on the current basis: a 30% fall in the basket price leaves an after-tax NPV8 of US\$65 million (Table 19-8)
Underground mining basis	The underground rate of US\$55.00 per tonne and the US\$138 million of development capital are benchmarks with no geotechnical, stope-design or ground-support basis	Underground supplies about 40% of mill feed. At US\$65/t the after-tax NPV8 is US\$872 million and at US\$75/t US\$848 million (Item 18.2)
Mining dilution	Dilution is held at 5% at zero grade, an open-pit benchmark, whereas long-hole stoping commonly incurs 10 to 20%	At 15% dilution the delivered head grade falls and the underground inventory would be reduced; the effect is quantified in the dilution sensitivity in the financial model

Risk	Nature	Potential effect
Fiscal terms	The deterministic fiscal engine now applies the annual Payable Royalty/tax offset, class-specific depreciation, freight deduction and loss-preservation assumption. The opinion of 19 August 2026 has been received and applied; a standalone reliance confirmation from BDO, the asset allocation, the freight eligibility and the loss-preservation permit remain outstanding.	The reported outputs may change if any open assumption is revised. Every case and sensitivity in this report is computed on the same 19 August 2026 fiscal schedule, so a change to that schedule moves the whole range together. The Project model assumes available tax-loss carry-forwards may be preserved in accordance with applicable Greenland law. The registrant is preparing an application for pre-approval of tax-loss preservation, separate from the Section 69 indirect Licence-transfer process. Approval has not been granted. A different outcome, or changes to the confirmed fiscal implementation assumptions, could affect the after-tax economic results.
Permitting	EIA, SIA, closure plan, IBA and Exploitation Licence all outstanding	Delay or refusal; additional cost or conditions
Arctic infrastructure and execution	Power, port, haulage, sealift, camp and the underground portal, ventilation and dewatering arrangements are conceptual	Capital cost and schedule overrun
Short mine life	9 years, limited by the extent of the estimated Mineral Resource	Limited period over which to recover capital; sensitivity to early-year disruption
Financing	Initial capital of US\$409 million, together with US\$138 million of underground development capital in Years 1 to 3, against an exploration-stage registrant	The property may not be developed

Table 22-1. Principal risks and uncertainties.

None of these risks is unusual for a rare-earth property at the initial assessment stage. In the Qualified Person's opinion the matters that most warrant early attention are the underground

basis, because underground mining supplies approximately 40 per cent of life-of-mine mill feed and neither the mining rate, the development capital nor the dilution allowance has any site-specific geotechnical support; metallurgical performance, because revenue is directly proportional to recovery and the testwork base is narrow and contains no underground composite; and the Licence transfer, because until it is completed the registrant does not hold the property. The Qualified Person also records that the signed hybrid optimization model and the volumetric reconciliation between the open-pit and underground components must be placed on file, since the component split on which the mine plan is built is drawn from that model and is not itself published in the MRE.

22.9 Overall conclusion

In the Qualified Person's opinion, the Sarfartoq ST1 property is a technically credible rare-earth development opportunity in a stable Western jurisdiction. It is supported by an estimated Mineral Resource of adequate size and grade in spatially exclusive and additive open-pit and underground components, a favourable neodymium–praseodymium distribution, encouraging preliminary metallurgy and an initial assessment founded exclusively on that Mineral Resource which returns positive preliminary economic indicators across the whole of the sensitivity range tested.

The property remains at an early stage. No Mineral Reserve has been estimated, the economic analysis includes Inferred Mineral Resources and is preliminary in nature, the mine life supported by the estimated Mineral Resource is nine years, the underground component that supplies approximately 40 per cent of mill feed rests on benchmark rather than site-specific engineering, and economic viability has not been demonstrated. Substantial exploration potential exists on the Licence which, if upgraded to Mineral Resources, could extend the mine life materially; that potential is described in Item 21 and is not relied upon in this report.

Subject to completion of the work programme recommended in Item 23, the Qualified Person considers the property to warrant advancement to a pre-feasibility study.

Cautionary statement — initial assessment and Inferred Mineral Resources

This Initial Assessment is preliminary in nature. It includes an economic analysis that is based, in part, on Inferred Mineral Resources. Inferred Mineral Resources are considered too speculative geologically to have the economic considerations applied to them that would enable them to be categorized as Mineral Reserves, and there is no certainty that the results of this Initial Assessment will be realized. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability. No Mineral Reserves have been estimated for the Sarfartoq ST1 Project.

ITEM 23 — RECOMMENDATIONS

The Qualified Person recommends the phased 2027 work programme summarized in Table 23-1 to advance the Sarfartoq ST1 Project from Initial Assessment toward Pre-Feasibility Study. The programme addresses the principal technical, geological, metallurgical, environmental, permitting and commercial uncertainties identified in this report.

The programme is conditional upon completion of Greenland Mines Ltd's acquisition of the licence-holding entity, approval by the Government of Greenland of the indirect transfer of Mineral Exploration Licence MEL 2020-32, required field and environmental approvals, seasonal access, and the availability and condition of existing Project assets.

The recommended 2027 programme has an estimated cost of US\$5.664 million, exclusive of any unallocated contingency. It is a phased planning estimate, not a project-development commitment, production decision, reserve-conversion forecast or statement that a specific drill metreage will upgrade any part of the Mineral Resource.

The budget was prepared from registrant-provided historical programme data, prior Sarfartoq contracts, drilling designs, supplier quotations, field-programme experience and management experience of comparable Arctic exploration and development programmes. It has been benchmarked against the 2025 Sarfartoq Technical Report, which proposed a significantly larger 20,000 m drilling programme. The budget is based on owner-operated field assets already available to the Project, including two Duralite 350 diamond drill rigs, drilling equipment and spares, an established exploration camp, generators, geological and core-handling equipment, and related field infrastructure. It should therefore not be compared directly with the cost of a fully mobilized third-party drilling programme.

The 7,500 m drilling allowance is a planning and budget cap. Final drill collars, spacing, sequencing and metreage must be established after Phase 1 geological and structural interpretation, data verification and review by the responsible Qualified Persons. The programme is intended to increase drill density in selected priority areas sufficiently to support a future resource-classification review. Whether any Inferred Mineral Resource is upgraded to Indicated Mineral Resource will depend on drilling results, geological continuity, assay and QA/QC results, density information and the responsible Mineral Resource Qualified Person's subsequent estimation and classification.

23.1 Phase 1 — Geological, environmental and technical definition

Phase 1 is intended to improve the geological and structural model, continue the environmental baseline, characterize mineralogical variability and complete the planning required for a targeted drilling campaign.

The Phase 1 programme comprises:

- Geological and structural mapping by a field team of approximately six to eight geologists, focused on ST1, the ST1–ST40 corridor and selected prospective occurrences.
- Drone photogrammetry, ground geophysics and downhole surveys to improve structural interpretation, drill targeting and three-dimensional geological modelling.
- The second year of environmental baseline investigations, to be undertaken with WSP Denmark, together with continuing environmental, social, heritage, permitting and technical/PFS support.
- A mineralogy study to create a three-dimensional mineralogical variation model across the ST1 resource, directing continued metallurgical testwork and providing a framework for mineralogical characterization of ST1 extensions and other targets.
- Camp recommissioning or expansion, field supplies, travel, fuel, food, freight, insurance, licence fees, safety planning and field readiness.

The principal Phase 1 deliverables will be an updated geological and structural interpretation, a QP-reviewed drill plan, a mineralogical-domaining model, updated environmental baseline data and an approved 2027 drilling execution plan.

23.2 Phase 2 — Targeted ST1 drilling and technical sampling

Subject to the Phase 1 decision gate, the Project should undertake up to 7,500 m of targeted owner-operated diamond drilling using the two existing Duralite 350 drill rigs. The drilling will focus on selected priority areas within the ST1 Mineral Resource, including areas where greater drill density may support future resource-classification review, as well as geological, structural and metallurgical information required for future mine-design work.

The drilling programme will prioritize lower-confidence margins of the ST1 Mineral Resource, including selected underground and peripheral open-pit areas, with the objective of increasing drill density to support future classification review. The current Hybrid scheduling allocation is approximately 56% Indicated by tonnage overall. The classification history, component allocation and location of the remaining Inferred material are summarized at Item 11.7.1. No classification upgrade is assumed or credited in this Initial Assessment.

Drilling will be supported by helicopter access and logistics, drill crews, camp operations, fuel, consumables, core logging, sampling, assay, QA/QC, survey control, core handling, sample/equipment freight and database support. The programme also includes limited bulk-sample blasting, subject to final technical design and required approvals.

The drilling programme should collect, where practicable, oriented core and data suitable for geotechnical, hydrogeological, density, mineralogical and metallurgical characterization. This work is intended to improve the basis for the underground mining method, dilution, ground-

support, water-management and metallurgical testwork assumptions that remain preliminary in this Initial Assessment.

23.3 Phase 3 — Corridor and target advancement

A separate limited programme will be undertaken on the ST1–ST40 corridor and selected additional targets. This work includes geological mapping, sampling and target definition. No Mineral Resource, mine-plan tonnage, capital, operating cost, NPV, IRR or other economic value is attributed to these areas in this report. Any drilling or other work outside ST1 will be designed to test exploration concepts only and will not form part of the Initial Assessment economic analysis.

23.4 Programme decision gates

The programme should be implemented through the following decision gates:

1. Pre-field authorization: Confirmation of acquisition closing, licence-transfer approval, field permissions, camp and drill-rig condition, health-and-safety plan, logistical arrangements and budget authorization.
2. Post-Phase 1 technical gate: Review and approval by the responsible Qualified Persons of the updated geological and structural interpretation, mineralogical-domaining work, data-verification status, priority drill targets, drill spacing and final drilling programme.
3. Post-drilling technical gate: Review of drilling, assay, QA/QC, density, geotechnical, hydrogeological and metallurgical results; determination by the responsible Mineral Resource QP whether sufficient information exists for a resource-model update or resource-classification review.
4. PFS advancement gate: Decision whether to proceed to Pre-Feasibility Study engineering, including locked-cycle and pilot-scale metallurgical work, detailed geotechnical and hydrogeological investigations, stope design, mine-design optimization, infrastructure engineering, environmental/social studies, exploitation-licence work, product-marketing and payability confirmation, fiscal confirmation and Class 4 or better cost definition.

23.5 2027 work programme and budget

Phase 1 — Geological, environmental and technical definition		

Geological, technical and camp staff	Seasonal geological, technical and camp team; includes geological and structural mapping, field support and camp operations	576,000
Drone, geophysical and down-hole surveys	Drone photogrammetry, geophysical surveys and downhole surveys to support geological interpretation and drill targeting	225,000
Environmental, social and technical consulting	Second-year environmental baseline programme, EIA/SIA work, permitting and technical/PFS support	540,000
Mineralogy and metallurgy	Three-dimensional mineralogical variation study across ST1 and associated mineralogical/metallurgical work/processing work.	162,000
Camp and general field supplies	Camp expansion/materials and field supplies	150,000
Food and camp consumables	Field-season food and camp consumables	185,000
Diesel and propane	Camp, drilling and field-support fuel	140,000
Travel	Field personnel travel and rotations	70,000
Government licence fees	Licence-related government fees	4,000
Freight	Samples, equipment and field freight	90,000
Insurance	Field programme insurance	54,000
Phase 1 subtotal		2,196,000
Phase 2 — Targeted ST1 drilling and technical sampling		
Direct owner-operated diamond drilling	Up to 7,500 m using two Project-owned Duralite 350 diamond drill rigs; final targets, spacing and metres subject to Phase 1/QP approval	1,620,000
Helicopter and aviation fuel	Helicopter field access, drill/camp logistics and Jet A	1,200,000
Assays, surveys and QA/QC	Core sampling, assays, analytical QA/QC, survey control and database support	504,000
Bulk-sample blasting	Subject to final technical scope and required approvals	36,000
Phase 2 subtotal		3,360,000
Phase 3 — Corridor and target advancement		
Additional targets and corridor work	Mapping, sampling and target advancement on corridors and prospective targets outside the ST1 economic analysis	108,000
Phase 3 subtotal		108,000
Total recommended 2027 programme Exclusive of unallocated contingency; scope is phased and subject to decision gates		5,664,000

Table 23-1. Recommended 2027 phased work programme and budget

23.6 Budget basis and limitations

The US\$5.664 million programme is a planning estimate developed for the 2027 field season. It includes no unallocated contingency. Any requirement for additional contingency, scope reduction, resequencing or expenditure beyond this amount must be subject to registrant management approval and, where it affects the technical basis of the Project, Qualified Person review.

The direct drilling cost allowance of US\$1.620 million equates to approximately US\$216 per metre for 7,500 m. This is a direct owner-operated drilling estimate and excludes shared programme costs such as helicopter logistics, camp operations, fuel, staff, assays, freight and technical support, which are budgeted separately in Table 23-1. The estimate reflects the availability of existing Project-owned drilling, camp and field assets and should not be treated as a general contractor drilling-rate benchmark.

The programme does not include costs for full pilot-scale processing, a comprehensive feasibility-level geotechnical campaign, detailed engineering, PFS completion, exploitation-licence submission, construction, project financing or a production decision. Those activities require further definition following the decision gates described above.

Subject to Qualified Person approval of the scope, budget basis and decision gates set out above, the recommended programme provides the costed work plan required for this Initial Assessment. The programme is intended to support advancement to the next study stage; it is not a recommendation to proceed to project development, construction or production.

ITEM 24 — REFERENCES

References Summary

- Sources span Greenland legislation, geological literature, market data, and corporate and technical reports.
- The list is consolidated across all sections of the report.

This report is supported by a comprehensive compilation of technical, scientific, regulatory and commercial references relevant to the Sarfartoq ST1 Rare Earth Project. The reference base includes published geological literature, Greenland mining legislation and permitting guidelines, historical exploration reports, metallurgical testwork, Mineral Resource documentation, government publications, recognized rare earth market data sources, environmental and climate studies, and public corporate disclosures relating to the Project.

The Qualified Person has relied upon these sources, together with information supplied by Greenland Mines Ltd and its technical consultants, in preparing this Initial Assessment. All technical interpretations, economic assumptions and conclusions have been based on information considered reasonable and appropriate for the level of study, with reliance on issuer-supplied information clearly identified where applicable.

This consolidated reference list covers the sources cited across this Technical Report Summary. Bibliographic details are given to the extent available from the source. Where a source is a subscription price assessment or a proprietary consultant report, that is identified.

References are grouped by category below.

Legislation and government (Greenland)

Mineral Resources Act — Greenland Parliament Act (Inatsisartut Act) No. 7 of 7 December 2009, in force 1 January 2010, as amended through Act No. 39 of 28 November 2019. Government of Greenland (govmin.gl).

Standard Terms for Exploration Licenses for Minerals (Excluding Hydrocarbons) in Greenland, 25 June 2013.

Uranium Act — Inatsisartut Act No. 20 of 1 December 2021.

Addendum No. 3 of 1 July 2014 to the Standard Terms for Exploration Licenses for Minerals (Excluding Hydrocarbons) in Greenland — royalty provisions differentiated by mineral (rare earth elements 5%; gemstones 5.5% plus a surplus royalty of 15% on gross profit exceeding 40%).

Selvstyrets lovbekendtgørelse nr. 62 af 24.09.2025 (Greenland Self-Government consolidated act No. 62 of 24 September 2025).

Mineral Licence and Safety Authority (MLSA); Environmental Agency for Mineral Resource Activities (EAMRA); Mineral Resources Authority (govmin.gl) — licensing and EIA / SIA procedures.

Geology and scientific literature

Secher, K. & Larsen, L.M., 1980. Geology and mineralogy of the Sarfartôq carbonatite complex, southern West Greenland. *Lithos*, 13.

Secher, K., 1989. Phosphate resources in the Sarfartoq Carbonatite Complex, southern West Greenland. In: Notholt, A.J.G., Sheldon, R.P. & Davidson, D.F. (eds), *Phosphate Deposits of the World*, Vol. 2. Cambridge University Press.

Keulen, N. & Secher, K., 2014. REE-mineralisation in the Sarfartoq Carbonatite, Greenland. Geological Survey of Denmark and Greenland (GEUS).

Thrane, K. et al., 2014. Rare earth element resources of Greenland. 1st European Rare Earth Resources Conference (ERES 2014), Milos.

Larsen, L.M., 1991. Geology of the alkaline province (kimberlite–lamproite dyke swarms), Sisimiut–Sarfartoq–Kangerlussuaq region, West Greenland.

Geological Survey of Denmark and Greenland (GEUS) — regional geological and airborne geophysical datasets, Sarfartoq region.

United States Geological Survey — Mineral Resources Data System, Sarfartoq rare earth element deposit record.

Market and pricing

Argus Media Ltd — Argus Metals / Argus Rare Earths price assessments (neodymium oxide and NdPr oxide FOB China), accessed June 2026.

Shanghai Metals Market (SMM) — China domestic rare earth oxide and metal assessments assessed June 2026.

Climate, environment and heritage

Climates to Travel; Visit Greenland; Weather2Travel; Climate-Data.org — Kangerlussuaq climate normals.

UNESCO World Heritage Centre — Aasivissuit–Nipisat: Inuit Hunting Ground between Ice and Sea (inscribed 2018); Destination Arctic Circle; Albatros Arctic Circle.

Corporate disclosures

Greenland Mines Ltd and Neo Performance Materials — public disclosures, May–June 2026 (Sarfartoq acquisition; exploration Licence MEL 2020-32; NNSR / NNSH; Section 69 transfer; Neo 60% offtake MOU; drilling; site visit; Hudson Resources 2023 acquisition).

Technical (project)

SGS Canada Inc. (Lakefield), 2024–2026. Beneficiation test-work and head assays, Project 19446-02A.



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

Simpson, R.G. (GeoSim Services Inc.) and Ghaffari, H. (Tetra Tech Canada Inc.), 2026. S-K 1300 Technical Report Summary: Sarfartoq Rare Earths Project, West Greenland — Mineral Resource Estimate. Prepared for Greenland Mines Ltd, file 704-ENG.VMIN03496-01. Effective date 31 July 2026; issued for use 16 August 2026. The source of the Mineral Resource Estimate reported at Item 11.

GeoSim Services Inc. — Mineral Resource estimation, block modelling and classification for the Sarfartoq ST1 zone (Item 11).

Tetra Tech Canada Inc. — mining, optimization and cost inputs to the reasonable-prospects test for the Sarfartoq ST1 Mineral Resource Estimate (Item 11).

AACE International, Recommended Practice No. 18R-97, Cost Estimate Classification System — as Applied in Engineering, Procurement, and Construction for the Process Industries.

Mariano, A.N. and Mariano, A., 2023. Mineralogical investigation of Sarfartoq rare-earth mineralisation.

Agricola Mining Consultants Pty Ltd, 2026. Sarfartoq ST1 Initial Assessment — mine plan, capital and operating cost estimates and discounted cash-flow model.

Fiscal and legal opinions

BDO Statsautoriseret Revisionspartnerselskab, Nuuk (Claus Bech, Partner, State Authorized Public Accountant) with NunaLaw, 19 August 2026. ‘Terms on royalty — Appendix 2 to addendum no. 3 of 1 July 2014 for Exploration Licenses for Minerals Greenland.’ Opinion addressed to Major Precious Greenland A/S (Att.: Bo Møller Stensgaard, chairman of the board), a wholly-owned Greenland subsidiary of Greenland Mines Ltd. Supplied to the Qualified Person by the registrant and relied upon as registrant-provided interpretation of statutory and regulatory matters under 17 CFR 229.1302(f)(1)(iii); see Items 3.4, 19.5 and 25. The opinion is given on the basis of Greenlandic law in force at its date, is expressly limited to the matters stated in it, and is not addressed to the Qualified Person; a standalone reliance confirmation has been requested from BDO.

ITEM 25 — RELIANCE ON INFORMATION PROVIDED BY THE REGISTRANT

Reliance on Information Provided by the Registrant Summary

- Reliance is limited to the categories permitted by 17 CFR 229.1302(f): macroeconomic assumptions, marketing information within registrant control, legal matters, environmental matters, local accommodations and governmental matters.
- Reliance is considered reasonable and customary for a report of this type.
- Qualified items are identified in the relevant sections (notably 3, 9, 18 and 19).

This section identifies the categories of information supplied by Greenland Mines Ltd upon which the Qualified Person have reasonably relied in preparing this Initial Assessment, in accordance with the provisions of SEC S-K 1300. The information includes matters relating to mineral tenure and ownership, commercial arrangements, environmental and permitting status, fiscal assumptions, local-accommodation information and governmental matters. These matters either fall outside the Qualified Person's areas of technical expertise or involve commercial and legal information that is appropriately provided by the registrant.

The Qualified Person has reviewed the registrant-provided information for internal consistency and reasonableness and has incorporated it into the technical assessment where considered appropriate. Although this information has not been independently verified, nor has legal title been verified, any material qualifications, assumptions or outstanding confirmations have been clearly identified within the relevant sections of this report.

The Qualified Person considers that reliance on the registrant-provided information is reasonable, customary and appropriate for an Initial Assessment prepared under SEC S-K 1300. Subject to the stated qualifications and limitations, no information has been identified that would materially affect the technical conclusions, Mineral Resource Estimate or preliminary economic assessment presented in this report.

S-K 1300 permits a Qualified Person to rely on information provided by the registrant for certain categories where it is reasonable to do so. This section identifies the information the QP has relied upon from GRML and confirms the basis for that reliance.

25.1 Reliance on registrant information



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

In preparing this Technical Report Summary, the Qualified Person has relied on certain information, data and assumptions provided by Greenland Mines Ltd (the registrant) and by third-party specialists engaged by the registrant, particularly in areas outside the Qualified Person's core technical expertise. This reliance includes, but is not limited to, macroeconomic assumptions, long-term rare earth price forecasts and marketing plans; legal interpretations of Greenland mining, environmental and tax legislation; environmental and social baseline data and permitting strategies; and local-accommodation and governmental information.

The Qualified Person has reviewed this information for internal consistency and reasonableness and has exercised professional judgement in determining the extent of reliance but has not independently verified all such information in detail. In accordance with Item 1302 and Item 601(b)(96) of Regulation SK, the Qualified Person does not disclaim responsibility for any parts of this Technical Report Summary that are based on or related to information provided by third-party specialists or the registrant; rather, the Qualified Person has incorporated such information where considered reasonable and appropriate for an Initial Assessment.

25.2 Data verification and limitations

Technical data underlying the Mineral Resource estimate — drilling, sampling, assay, geological and density data — are the responsibility of the Qualified Persons who prepared the Mineral Resource Estimate and are documented in the Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary (file 704-ENG.VMIN03496-01), effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc. (the “MRE TRS”). The author of this Initial Assessment relies on the issued MRE TRS and its responsible Qualified Persons for the Mineral Resource Estimate. The author has reviewed the MRE TRS and relevant supporting information for reasonableness and internal consistency and has identified the additional verification and technical work required for PFS-level work and any future Mineral Reserve estimate; that work is listed at Items 9.4 and 23. Metallurgical and engineering data are addressed at Items 10, 14 and 18.

Any material risks or uncertainties arising from limitations in the information provided by the registrant, data verification or reliance on third-party specialists have been identified and discussed in the relevant sections of this Technical Report Summary, including Items 11, 17, 19, 21 and 23. The Qualified Person believes that these limitations do not invalidate the overall conclusions of this Initial Assessment but may affect the degree of confidence in specific aspects of the Project and should be addressed as part of the recommended work programme.

25.3 Categories of reliance

Section 229.1302(f) of Regulation S-K permits a qualified person to rely on information provided by the registrant in six categories only: macroeconomic trends, data and assumptions; marketing information within the registrant's control; legal matters; environmental matters;

local accommodations; and governmental factors. Reliance is confined to those categories and is set out below.

Permitted category under § 229.1302(f)	Matter relied upon	Item
Macroeconomic trends, data and assumptions	Rare-earth demand and supply outlook and the long-term price environment, as informed by registrant and third-party market material	16, Appendix C
Marketing information	The existence and status of a non-binding memorandum of understanding with Neo Performance Materials, and its commercial context. No binding offtake, sales, transport or refining agreement exists. The payability adopted in this report is NOT relied upon from the registrant: it is derived by the Qualified Person from a processing toll (Item 16.7.6).	16
Legal matters	Existence, status and terms of exploration Licence MEL 2020-32; ownership and acquisition of Neo North Star Resources; the Licence-transfer process and its status	3
Environmental matters	Status of the environmental and social baseline studies, the permitting pathway and its expected sequence	17
Governmental factors	Greenland fiscal framework applicable to the Project, including the 5% Basic Royalty benchmark, Royalty Conversion Amount/tax-offset mechanism, corporate income tax, dividend withholding tax, statutory depreciation maxima, qualifying-freight treatment, tax-loss preservation process, the Uranium Act and related regulatory matters. The Qualified Person relies on the BDO Nuuk/NunaLaw opinion dated 19 August 2026, supplied by the registrant, as an interpretation of statutory and regulatory matters under 17 CFR 229.1302(f)(1)(iii). The scope of reliance and outstanding model-implementation confirmations are described in Items 3.4, 19.5 and Appendix A.5.6.	3.4, 19.5, 22.8, 25 and Appendix A.5.6

Table 25-1. Categories of reliance on registrant-provided information, confined to those permitted by 17 CFR 229.1302(f).

The boundary of reliance

Matters NOT relied upon from the registrant. The qualified person takes responsibility for the mine design and production schedule, the capital and operating cost estimates, the discounted cash-flow model and its assumptions, the cut-off grades, and the payability derivation. Where the registrant supplied factual inputs to those estimates — for example infrastructure locations, site conditions and existing camp and equipment inventories — the qualified person has treated them as factual inputs, checked them for internal consistency and against public disclosures, and adopted them. They are not reliance within the meaning of § 229.1302(f), and responsibility for the resulting estimates rests with the qualified person.

The Mineral Resource estimate at Item 11 is a separate matter. It is not relied upon from the registrant but from the qualified person responsible for that estimate, as set out in Item 11.5 and the Date and Signature Page. Metallurgical test work is the work of SGS Canada, reviewed and adopted by the qualified person, who takes responsibility for the parameters carried into the economic analysis.

25.4 Reasonableness of reliance

In the QP's opinion, reliance on GRML for these categories is reasonable and customary for a report of this type, because the matters either fall outside the QP's areas of expertise (for example legal title and taxation) or depend on issuer-held commercial information (for example offtake terms). The QP has reviewed the information for internal consistency and reasonableness but has not independently verified it.

Where reliance is qualified, or where confirmation is outstanding, this is identified in the relevant section - notably the conditional title status in Item 3, the fiscal terms and Payable Royalty implementation in Items 3.4 and 19.5, the standalone reliance confirmation requested from BDO, and the verification work required for PFS-level study in Item 9. The position stated in this Item is consistent with Items 2.6, 9 and 11.

Reliance on Information Provided by the Registrant and Other Specialists

Information Category	Primary Source	QP Review / Verification	Extent of Reliance
Mineral Exploration Licence (MEL 2020-32), ownership and tenure	Greenland Mines Ltd; Greenland Mineral Licence and Safety Authority (MLSA); public Licence records	Reviewed for internal consistency with publicly available Licence records	Relied upon. Legal title has not been independently verified by the QP.
Corporate ownership and acquisition of Neo North Star Resources	Greenland Mines Ltd public announcements and transaction documents	Compared with public disclosures	Relied upon. Corporate legal matters are outside the QP's expertise.

Information Category	Primary Source	QP Review / Verification	Extent of Reliance
Mineral Resource Estimate	Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc. (MRE TRS, effective 31 July 2026, issued for use 16 August 2026)	Reviewed for reasonableness and for consistency with the economic assessment and mine-planning assumptions	Relied upon. Responsibility for the Mineral Resource Estimate is allocated to the Qualified Persons who prepared it; their dated signatures and consents must accompany this TRS before SEC filing.
Geological database and historical exploration results	Registrant and previous operators (Hudson Resources, Neo North Star Resources)	Reviewed for completeness and consistency; no independent re-assaying undertaken	Relied upon following reasonableness review.
Drillhole database and survey information	Registrant	Reviewed as part of the Mineral Resource documentation	Relied upon by the Mineral Resource QP.
Metallurgical test-work	SGS Canada (Lakefield)	Test reports reviewed and assessed for suitability for an Initial Assessment	Considered appropriate and relied upon. No independent metallurgical testing undertaken by the QP.
Process flowsheet	Historical engineering studies; SGS; Registrant	Reviewed for technical reasonableness	Considered appropriate for a conceptual Initial Assessment.
Mine design and production schedule	Agricola Mining Consultants	Independently developed and reviewed	Prepared by the QP.
Capital cost estimates	Agricola first principles estimates supported by published benchmark projects	Independently prepared using benchmarking and professional judgement	Responsibility of the QP.
Operating cost estimates	Agricola benchmarking, supplier information, comparable Arctic mining operations	Independently reviewed and developed	Responsibility of the QP.
Rare earth market information	Argus Media, Adamas Intelligence, Project Blue, Benchmark Mineral Intelligence, USGS, public industry reports	Independently reviewed and reconciled	Responsibility of the QP.
Rare earth oxide price assumptions	Independent market publications and long-term industry forecasts	Independently evaluated and selected for the mine plan	Responsibility of the QP.



Information Category	Primary Source	QP Review / Verification	Extent of Reliance
Metallurgical recovery assumptions	SGS metallurgical testwork; comparable carbonatite operations	Independently reviewed	Considered reasonable for an Initial Assessment.
Concentrate payability assumptions	Not relied upon from the registrant	Derived by the Qualified Person from a processing toll built from published cost evidence (Item 16.7.6)	Responsibility of the QP. Payability is derived, not selected, and is not taken from the registrant or from any commercial discussion.
Transportation and logistics	Registrant; publicly available Greenland infrastructure information	Reviewed against regional operating experience	Considered reasonable for an Initial Assessment.
Environmental baseline information	Registrant environmental consultants	Reviewed for consistency only	Relied upon. Environmental specialists remain responsible for the underlying studies.
Social Impact Assessment information	Registrant and specialist consultants	Reviewed for completeness	Relied upon.
Permitting pathway	Greenland legislation; MLSA guidance; Registrant	Independently reviewed	Responsibility of the QP for interpretation.
Fiscal regime (taxation and royalties)	Greenland legislation and Government publications; the opinion of BDO Nuuk (C. Bech) with NunaLaw dated 19 August 2026 on royalty, tax offset and depreciation, addressed to Major Precious Greenland A/S, a wholly owned Greenland subsidiary of GRML, and supplied by the registrant. It supersedes the 18 August 2026 summary of the same advice.	Reviewed for internal consistency against the report and the staged implementation instructions; not independently verified as a tax opinion.	Relied upon as registrant-provided interpretation of statutory and regulatory matters under 17 CFR 229.1302(f)(1)(iii), subject to the standalone reliance confirmation requested from BDO, locked-model reconciliation and QP approval.
Discounted Cash Flow model	Agricola Mining Consultants	Independently prepared and internally checked	Responsibility of the QP.
Financial model assumptions	Agricola with supporting technical inputs	Independently reviewed	Responsibility of the QP.
Legal matters	Registrant and legal advisers	Not independently verified	Relied upon. Outside the expertise of the Qualified Person.

Information Category	Primary Source	QP Review / Verification	Extent of Reliance
Land access, agreements and contractual rights	Registrant	Not independently verified	Relied upon.
Future permitting and governmental approvals	Registrant; Greenland authorities	Reviewed against current legislation	Relied upon with respect to future administrative processes.

Table 25-2. Reliance on information provided by the registrant and other specialists.

25.5 Qualified Person's Statement on Reliance

In accordance with SEC Regulation S-K 1300, the Qualified Person has independently reviewed the technical information considered necessary to support the conclusions presented in this Initial Assessment. The Qualified Person has relied upon information supplied by Greenland Mines Ltd and specialist consultants in those areas that are outside the Qualified Person's professional expertise, including legal matters, mineral tenure, corporate ownership, environmental studies, social studies, commercial agreements and certain fiscal information. Except where specifically stated, the Qualified Person considers that the information relied upon is reasonable for the purposes of this Initial Assessment and that any limitations do not materially affect the conclusions of this Report.

DATE AND SIGNATURE PAGE

This Technical Report Summary titled “Technical Report Summary — Initial Assessment — Sarfartoq Rare Earths Project”, with an effective date of 31 July 2026 and an original issue date of 16 August 2026, was prepared by and under the direction of the Qualified Persons identified below. The source version was signed as of the original issue date; this revised client presentation version contains material regulatory clarifications and must be reviewed and re-executed by each responsible Qualified Person before filing.

The author is a mineral-industry professional with more than 50 years of relevant experience in the exploration, assessment and economic evaluation of rare earth and comparable mineral projects, including recent Qualified Person, due-diligence and technical-advisory assignments on rare-earth projects in Greenland, and is an eligible Member in good standing of the Australasian Institute of Mining and Metallurgy.

Malcolm Castle is the lead Qualified Person responsible for the Initial Assessment mine plan, economic analysis and all sections of this Technical Report Summary other than Item 11. Responsibility for Item 11 is allocated to Ronald G. Simpson, P.Geo., for the Mineral Resource Estimate and Hassan Ghaffari, P.Eng., M.A.Sc., for the mining, optimization and cost inputs to the reasonable-prospects test, as described in Items 11 and 25. Each responsible Qualified Person must date and sign this TRS, with responsibilities clearly delineated, before it is used in an SEC filing. Until those signatures and consents are appended, this client presentation version is not filing-ready.

- Is Independent from the registrant as defined by S-K 1300.
- Has read S-K 1300 and Item 601(b)(96) and confirms that this client presentation version addresses those requirements to the extent supported by the current record, subject to the completion items expressly identified in the report.
- Will provide a fresh consent to filing and reference of this TRS only after the completion conditions have been resolved and every responsible Qualified Person has signed.



MALCOLM CASTLE, MAusIMM (Competent Person, Geology)

BSc Hons (Applied Geology UNSW), GCertAppFin (Sec Inst), M AusIMM

Agricola Mining Consultants Pty Ltd

Qualified Person

Execution date: 20 August 2026

Additional responsible Qualified Person execution blocks



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

Project Memorandum

To:	Bo Stensgaard Greenland Mines Ltd.	Date:	Aug. 20, 2026
cc:		From:	Ronald Simpson, Geosim Services Inc.
Subject:	2026 ST1 Zone MRE	Project:	Sarfartoq

Introduction

This memorandum relates to the Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary, file 704-ENG.VMIN03496-01, effective 31 July 2026 and issued for use 16 August 2026.

Comments on the MRE

I hereby confirm that I am the QP responsible for the Mineral Resource Estimate of the ST1 zone of the Project. Hassan Ghaffari of Tetra Tech Canada Inc. is responsible for the Metallurgical section, the assumptions used as inputs for reasonable prospects of economic extraction, and the mining/optimization procedures.

The hybrid scenario presented in the MRE was optimized as a single case, with spatially exclusive open-pit and underground components. The underground component lies beneath an optimized open-pit shell and incorporates a 20 m interface exclusion zone representing the non-recoverable material that lies between the open pit and the underground resources.

Resource classification of the ST1 zone

The initial MRE for the ST1 Zone was released in January 2011 and was all classified as inferred. The bulk of delineation drilling was carried out later that year. The 2012 and 2023 exploration drill programs were principally aimed at testing extensions and other targets on the property and were not designed to upgrade resource classification.

The current hybrid resource model is classified as follows:

- Approximately 56% is classified as Indicated overall by tonnage.
- Approximately 54% of the open-pit component is classified as Indicated by tonnage.
- Approximately 60% of the underground component is classified as Indicated by tonnage.
- The remainder of the resource is classified as Inferred.

Almost all of the principal carbonatite body within the drilled ST1 area is classified as Indicated, with the remaining Inferred material principally occurring in lower-grade peripheral open-pit material and at lower-confidence margins of the underground component.

'Inferred resources' have a great amount of uncertainty as to their existence, and economic and legal feasibility. It cannot be assumed that all or any part of an Inferred Mineral Resource will ever be upgraded to a higher category. Any future classification change remains subject to additional drilling, geological and grade-continuity interpretation, QA/QC and density information, estimation results and the determination of the responsible QP in any future MRE.

Dated August 20, 2026



Ronald G. Simpson, P.Geo.

CONSENT PAGE

To: Greenland Mines Ltd (“GRML” or the “Registrant”)

Re: Technical Report Summary titled “*Technical Report Summary — Initial Assessment — Sarfartoq Rare Earths Project*”, with an effective date of 31 July 2026 (the “TRS”)

I, MALCOLM CASTLE of Agricola Mining Consultants Pty Ltd, the Qualified Person responsible for the TRS identified above, in connection with the TRS and its use by the Registrant, would, upon execution of this consent, consent to the following:

(a) the filing of the TRS as an exhibit to, and the use of and reference to the TRS and information derived from it in, any registration statement, report, or other filing made by the Registrant with the SEC under the Securities Act of 1933 and the Securities Exchange Act of 1934, each as amended (collectively, the “Filings”), and the incorporation by reference of the TRS into any such Filing;

(b) the use of my name, and references to me as a Qualified Person, and to Agricola Mining Consultants Pty Ltd, in the TRS and in the Filings, including in any summary of, or extract from, the TRS; and

(c) the use in the Filings of the disclosure derived from the sections of the TRS for which I am responsible.

I confirm that:

(i) I have read the disclosure in the Filings that summarizes or is derived from the TRS, and, to the best of my knowledge, information and belief, that disclosure fairly and accurately represents the information in the sections of the TRS for which I am responsible and is not misleading;

(ii) I am a Qualified Person as defined in § 229.1300 of Regulation S-K and am responsible for the preparation of all sections of the TRS other than Item 11 (Mineral Resource Estimates), and that in preparing those sections I have relied upon specialist work identified in Item 25, in each case reviewing that work for reasonableness and internal consistency; and

(iii) Item 11 (Mineral Resource Estimates) is based on the work of Mr Ronald G. Simpson, P.Geo., of GeoSim Services Inc., the Qualified Person responsible for the Mineral Resource Estimate, and Mr Hassan Ghaffari, P.Eng., M.A.Sc., of Tetra Tech Canada Inc., responsible for the mining, optimization and cost inputs to the reasonable-prospects test, as set out in the Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary (file 704-ENG.VMIN03496-01), effective 31 July 2026 and issued for use 16 August 2026. Responsibility for Item 11 must be accepted in this TRS by those Qualified Persons through dated signatures and consents before SEC filing. This consent covers only the sections for which Malcolm Castle accepts responsibility.



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

I confirm that I am independent of the Registrant applying the standards contemplated by sub-part 229.1300.

Once executed, this consent may be filed by the Registrant as an exhibit to the Filings pursuant to Item 601(b)(23) of Regulation S-K.

Execution date: 20 August 2026



MALCOLM CASTLE, MAusIMM (Competent Person, Geology)

BSc Hons (Applied Geology UNSW), GCertAppFin (Sec Inst), M AusIMM

Agricola Mining Consultants Pty Ltd

Qualified Person

APPENDIX A — ECONOMIC ASSUMPTIONS REGISTER

A.1 Status and purpose

Status and purpose

This register is the definitive source of the economic assumptions used in the discounted cash-flow analysis reported in Item 19 of this Technical Report Summary. It records each adopted value, its basis, and the confidence the Qualified Person attaches to it. All figures are order-of-magnitude estimates appropriate to an initial assessment; they are not feasibility-level estimates and are to be validated at pre-feasibility.

Every assumption in this register applies to the ST1 hybrid mine plan described in Item 13 — an open pit in Years 1 to 4 followed by an underground long-hole stoping operation to Year 7 — which is founded exclusively on the estimated Mineral Resource reported in Item 11, in its spatially exclusive and additive open-pit and underground components. No assumption in this register relates to material for which a Mineral Resource has not been estimated.

A.2 Basis of estimate

Development case: concentrate-only flowsheet comprising crushing, grinding and flotation, with the flotation concentrate exported in bulk bags. No on-site hydrometallurgical processing is assumed.

Mine plan: hybrid ST1 open pit and underground operation. Active open-pit and underground mining is scheduled from Years 1 through 7. Deferred low-grade open-pit stockpile is reclaimed and processed in Years 7 through 9. The total scheduled processing life is nine years. The schedule delivers 12.207 million tonnes of life-of-mine mill feed, comprising 7.290 million tonnes of open-pit material and 4.918 million tonnes of underground material, at a delivered head grade of 1.2591% TREO. The open-pit Inferred Mineral Resource is stockpiled during the open-pit phase and reclaimed to the mill in Years 7 to 9. All scheduled material is estimated Mineral Resource.

Currency and basis: constant second-quarter 2026 United States dollars, unlevered, with no allowance for inflation, escalation or project financing. Reference discount rate 8% real.

Estimate class: AACE International Class 5, with a contingency of 20% of direct capital. The accuracy range adopted for the estimate is stated once, at Item 2.8, and is not repeated here.

A.4 Mining cost and the treatment of waste

The open-pit mining rate of US\$6.00 per tonne of ore is an all-in contract rate inclusive of waste movement at the pit-design strip ratio. No separate waste-mining cost is charged.

Because the open-pit Inferred Mineral Resource is retained as ore rather than sent to a waste pile, 3.329 million tonnes moves from the waste line to the ore line. Total pit material movement is unchanged at 10.077 million tonnes. Waste mined is accordingly 2.768 million tonnes and the strip ratio on total open-pit ore is 0.38 to 1.

The mining and stripping cost of the deferred material is incurred in the open-pit phase and is committed by the Indicated ore whether the deferred material is subsequently treated. It is therefore charged in the years in which it is incurred and is not charged again when the stockpile is reclaimed. Reclaimed material carries a reclaim and rehandle charge of US\$1.50 per tonne in place of a mining charge.

A.5 Economic assumptions register

Confidence ratings are: High — supported by operating mines or published engineering studies; Moderate — engineering judgement and benchmarking, subject to refinement at pre-feasibility; Preliminary — conceptual, requiring confirmation or commercial negotiation.

A.5.1 Mining

Assumption	Adopted value	Basis / benchmark	Confidence
Throughput	1.4 Mtpa (4,000 t/d)	Initial assessment development case	High
Mine life	9 years	Production schedule, Item 13	High
Life-of-mine mill feed (delivered)	12.207 Mt	100% Mineral Resource, Item 11	High
Mine plan configuration	Open pit Years 1–4; underground Years 4–7	Spatially exclusive and additive open-pit and underground components of the hybrid scenario as optimized in the MRE, with a 20 m exclusion zone at the interface	Moderate
Open-pit feed delivered	7.290 Mt (59.7% of mill feed)	Production schedule, Item 13	High
Underground feed delivered	4.918 Mt (40.3% of mill feed)	Production schedule, Item 13	High

Assumption	Adopted value	Basis / benchmark	Confidence
Open-pit mining cost	US\$6.00/t ROM	All-in, including waste at 1.53:1 (A.4); peer range US\$5–8/t	Moderate
Underground mining cost	US\$55.00/t ROM	All-in long-hole stoping including development, backfill and underground services; peer range US\$45–75/t. No geotechnical or stope-design basis	Preliminary
Strip ratio (open pit, life of mine)	1.53 : 1	Optimization shell; 1.50:1 rising to 2.50:1	Moderate
Delivered head grade	1.2591% TREO	2026 Mineral Resource Estimate, capture-weighted, after mining recovery and dilution	High
Mining dilution	5% at zero grade	Open-pit industry benchmark; long-hole stoping commonly incurs 10–20%	Preliminary
Mining recovery	95%	Industry benchmark	Moderate

Table A-1a. Mining assumptions.

A.5.2 Processing (at 1.4 Mtpa)

Cost centre	US\$/t ROM	Basis / benchmark	Confidence
Crushing	4.00	Concentrator benchmark, scale-adjusted	High
Grinding	10.00	Published concentrators, scale-adjusted	High
Flotation	20.00	Carbonatite benchmark, scale-adjusted	High

Cost centre	US\$/t ROM	Basis / benchmark	Confidence
Thickening	5.00	Industry benchmark	High
Filtration	5.00	Industry benchmark	High
Tailings	6.00	Remote-mine benchmark	Moderate
Water supply	2.72	Engineering estimate	Moderate
Power	5.00	Comparable projects (hydro/hybrid)	Moderate
Process labour	7.00	Minimum crew at 1.4 Mtpa	Moderate
Maintenance	5.00	Industry benchmark	Moderate
Total processing	69.72	Sum of the above	High

Table A-1b. Processing-cost assumptions at 1.4 Mtpa.

A.5.3 Concentrate, recovery and metallurgy

Assumption	Adopted value	Basis	Confidence
Mass pull to concentrate	9.7%	SGS F105 Master Composite	Moderate
Metallurgical recovery	63.6%	The neodymium recovery achieved on the SGS F105 Master Composite; the cerium-proxy result on the same composite was 62.2%. Applied once	Moderate
Concentrate grade	8.25% TREO, life-of-mine average	Derived from the mass balance: life-of-mine delivered head grade × recovery ÷ mass pull (Item 14.7)	Moderate

Assumption	Adopted value	Basis	Confidence
Concentrate produced	1,184.1 kt life of mine; 135.5 kt/a at nameplate	Life-of-mine mass balance, Table 14-4	Moderate
Contained TREO in concentrate	97,753 t life of mine	Life-of-mine mass balance, Table 14-4	Moderate
Concentrate moisture	<10%	Industry standard; not modelled	High

Table A-1c. Concentrate, recovery and metallurgy assumptions.

A.5.4 General and administration, and logistics

Assumption	Adopted value	Basis	Confidence
General and administration	US\$16.50/t ROM	Remote operations build at 1.4 Mtpa; consistent with the Mineral Resource cut-off basis	Moderate
Site logistics	US\$2.50/t ROM	Bagging, storage and mine-to-port trucking	Moderate
Ocean freight, port handling, marine insurance	Recovered through payability	Not carried in operating cost; see Item 16	Preliminary

Table A-1d. General-administration and logistics assumptions.

A.5.5 Capital cost

Assumption	Adopted value	Basis	Confidence
Total initial capital	US\$409.0M in Year 0	Direct capital US\$288.2M plus Indirects and contingency of US\$121.0M (Item 18.1)	Moderate
EPCM	10% of direct capital	Initial assessment benchmark	High

Assumption	Adopted value	Basis	Confidence
Owner's costs	5% of direct capital	Concentrator project benchmark	High
Spares / first fills / commissioning	2% / 1% / 2% of direct capital	Industry benchmark	Moderate
Insurance and freight	2% of direct capital	Industry benchmark	Moderate
Contingency	20% of direct capital, being US\$57.6M	Initial assessment benchmark	High
Underground development capital	US\$138.0M across Years 1 to 3 (US\$46.0M per year)	Portal, decline, ventilation and primary development ahead of the underground taking over mill feed in Year 4. Benchmark figure; no site-specific design	Preliminary
Sustaining capital	1.75% of direct capital per annum in open-pit years (US\$5.04M) and 3.5% per annum in underground years (US\$10.08M); US\$65.5M over the life of mine	Open-pit and underground phase benchmarks	Moderate
Tailings storage facility lift	US\$22.5M in Year 5, a single staged lift	Staged lift design	Moderate
Closure provision	US\$38.0M in Year 10, the year following the cessation of mining in Year 9	Activity-based allocation, approximately 13% of direct capital	Moderate

Assumption	Adopted value	Basis	Confidence
Working capital	US\$35.0M drawn in Year 1, released in Year 9	Nets to nil over the life of mine and is excluded from the life-of-mine capital total	Moderate
Total life-of-mine capital	US\$673.0M	Sum of initial capital, underground development, sustaining capital, the tailings lift and closure. The components sum exactly to the total	Moderate

Table A-1e. Capital-cost assumptions.

A.5.6 Revenue, market and fiscal

Assumption	Adopted value	Basis	Confidence
TREO basket price	US\$51.88/kg TREO	Distribution-weighted per-oxide deck on the scheduled feed, Item 16.6 and Appendix C	Moderate
Processing toll	US\$12.74/kg contained TREO	Cracking and separation cost plus processor margin, fixed in US\$/kg. Bracketed against Western producers' lodged accounts, Items 16.7.6.1 and C.11; not yet quoted by a processor	Preliminary
Payability	75.4%	DERIVED as one less the toll divided by the basket (Item 16.7.6). Not selected, and not adopted from a comparable range	Preliminary
Net realised price	US\$39.14/kg TREO	Basket price less the toll	Moderate
Ad valorem royalty	5% benchmark within annual Payable Royalty mechanism	Annual government take is modelled as the greater of 5% of value of minerals sold and 25% corporate tax before royalty deduction. The full logistics line is provisionally deducted as qualifying freight.	Modelled; adviser/QP confirmation
Surplus royalty	Not applicable — nil	The 15% surplus royalty on gross profit exceeding 40% is imposed on a licensee exploiting gemstones only and does not	High

Assumption	Adopted value	Basis	Confidence
		attach to rare earth elements (Items 3.4 and 19.5). Removed from the model	
Corporate income tax	25% with on-account payment	The model assumes payment on account within the year. Otherwise, the advice indicates an effective 26.5% rate from 20 November plus 6% interest.	Modelled; adviser/QP confirmation
Depreciation	30% DB plant/equipment/intangibles; 5% SL buildings; 10% SL vessels - elective maxima	Maximum rates applied from Year 1 when assets enter service: 30% DB plant/equipment/intangibles and 5% SL buildings; no vessel basis. Initial capex building allocation is 12.25% based on identified direct building costs; later additions are treated as plant/equipment/intangibles.	Modelled; adviser/QP confirmation
Discount rate	8% real	Industry practice for an initial assessment	High
Inflation and foreign exchange	Constant real Q2 2026 US\$	No escalation modelled	Moderate

Table A-2. Revenue, market and fiscal assumptions. The assumptions and results in this appendix reconcile to the locked financial model used for Item 19, on the 19 August 2026 fiscal schedule and the confirmed invoice-sales-value royalty base. The asset-class allocation, the eligibility of the freight component and the loss-preservation permit remain subject to confirmation as stated in Items 3.4 and 19.5.

Revised depreciation basis — implemented.

The fiscal schedule applies the maximum statutory rates from Year 1 when assets enter service: 30% declining balance for plant/equipment/intangibles and 5% straight line for buildings; no vessel basis is identified. Initial capex is allocated 12.25% to buildings from identified direct building costs (US\$35.31M / US\$288.16M direct capital), with later depreciable additions assigned to plant/equipment/intangibles. This allocation and the start-of-service interpretation require tax-adviser and QP confirmation. The revised schedule is reconciled, but it is not a tax opinion.

Fiscal-confirmation status.

The BDO Nuuk/NunaLaw opinion dated 19 August 2026 confirms the invoice-sales-value basis for the Basic Royalty benchmark, the annual accrual basis of the Royalty Conversion Amount, the non-applicability of the surplus royalty to rare-earth extraction, and the applicable statutory maximum depreciation rates. The detailed allocation of capital between buildings and plant/equipment/intangibles, the selected depreciation-election schedule, start-of-service timing and the qualifying-freight portion of the logistics cost remain model assumptions subject to final tax-adviser and Qualified Person confirmation. The

locked financial model applies those assumptions consistently across the Base, Low, High and sensitivity cases.

A.5.7 Resulting operating cost

Operating cost	Unit basis — the tonnage the rate is charged on	US\$/t of that tonnage	Life-of-mine US\$M
Mining — open pit, pit phase	Open-pit ore mined in the pit phase; all-in rate inclusive of waste	6.00	23.8
Mining — underground	Underground ore mined	55.00	270.5
Reclaim and rehandle — deferred stockpile	Deferred low-grade open-pit stockpile reclaimed	1.50	5.0
Processing	ROM mill feed processed	67.50	824.0
General and administration	ROM mill feed processed	9.00	109.9
Logistics	ROM mill feed processed	2.50	30.5
Total — life-of-mine weighted average	ROM mill feed processed	103.5	1,264

Table A-3. Resulting operating cost, reconciled to the locked financial model used for Item 19, *Agricola Sarfartoq ST1 DCF v10 Fiscal Update 19 Aug 2026.xlsx*, as of 19 August 2026. Mining unit rates are charged on ore mined by each mining method and the reclaim rate on stockpile reclaimed; processing, general and administration, and logistics are charged on ROM mill feed. The life-of-mine average is the weighted result of an open-pit phase at US\$85.00/t, an underground phase at US\$134.00/t and a stockpile-reclaim phase at US\$80.50/t. The unit bases are those stated at Item 18.2 and are used without variation in Item 19.

A.6 Confidence and sensitivity

The assumptions carrying the greatest influence on the result, and the least support, are the metallurgical recovery, the concentrate payability, the basket price and the underground mining basis. The first three act directly and proportionately on revenue, to which the result is most sensitive (Item 19.7). Recovery rests on bench-scale testwork on two composites, neither representative of underground feed; payability is derived from a processing toll that is bracketed against Western producers' lodged accounts but has not been quoted by a processor or tested in a term offtake negotiation; and rare-earth prices are volatile and thinly traded outside China. The underground basis — a mining rate of US\$55.00 per tonne, US\$138 million of development capital and a dilution allowance of 5 per cent carried over from open-pit practice — governs approximately 40 per cent of the mill feed and rests entirely on benchmarks. The capital and operating cost estimates, while of Class 5 accuracy, exert materially less leverage on the result than revenue does, although operating cost is a more material lever on the hybrid plan than it was on the open-pit-only plan.

A.7 Cautionary statements

Initial assessment — preliminary in nature

This register supports an initial assessment prepared under subpart 1300 of Regulation S-K. The initial assessment is preliminary in nature and includes Inferred Mineral Resources that are considered too speculative geologically to have the economic considerations applied to them that would enable them to be categorized as Mineral Reserves. No Mineral Reserves have been estimated. There is no certainty that the results of the initial assessment will be realized. Mineral Resources that are not Mineral Reserves do not have demonstrated economic viability.

The assumptions in this register are order-of-magnitude estimates of AACE International Class 5 accuracy, suitable for assessing reasonable prospects for eventual economic extraction. They are not feasibility-level estimates and are not a basis for a production decision or for project financing. Actual costs and outcomes may differ materially. This document contains forward-looking information; readers should not place undue reliance on it.

A.8 Qualified Person's statement

QP Opinion A-1 — Economic Assumptions Register (re-execution required).

The technical, production, cost, price, recovery and payability assumptions remain those used for the Initial Assessment. The deterministic fiscal outputs have now been reconciled to the BDO Nuuk / NunaLaw opinion of 19 August 2026: annual Payable Royalty/tax offset, class-specific depreciation, qualifying freight deduction, on-account tax, closure deduction and tax-loss-preservation assumption.

Appendix B — Withdrawn

Status

Appendix B has been withdrawn from this technical report summary in its entirety.

It presented a Market Value of the property prepared under the VALMIN Code. That valuation attached a monetary value to ground for which no Mineral Resource has been estimated, and its cross-check valued a conceptual target of tonnage and grade over ground for which this report expressly declines to state an exploration target.

A Market Value is an estimate of economic value. Attaching one to material that is expressly not a Mineral Resource is inconsistent with 17 CFR 229.1302(c)(2)(iv), for the same reason that the probability-weighted outcomes formerly presented in Appendix G were withdrawn. The VALMIN Code has no standing under subpart 1300 of Regulation S-K, and a caption describing the value as non-additive does not cure the difficulty.

Nothing in Item 13, Item 18, Item 19 or the Executive Summary drew any input from this Appendix, so its removal does not affect the base case, the results excluding Inferred Mineral Resources, or the CIF Europe (Rotterdam) price scenario. The dependency ran the other way: the withdrawn valuation derived a residual by deducting the value of the ST1 Mineral Resource.

A valuation of the property may be commissioned separately, addressed to the registrant and prepared for a purpose outside this technical report summary. It does not belong within an initial assessment prepared under subpart 1300.

APPENDIX C — RARE EARTH MARKET REVIEW AND STRATEGIC WESTERN PRICE BASIS

This appendix consolidates the market evidence supporting the rare earth oxide price deck adopted in the economic analysis (Items 16 and 19). It sets out why a strategic Western (ex-China) price basis is the appropriate basis for a Western-aligned Greenland project selling into a non-China supply chain and demonstrates that the adopted deck is supported by that basis. It should be read with Appendix D (price forecast methodology).

C.1 Summary

- Rare earth oxides are not exchange-traded. Since China's April 2025 export controls, the market has bifurcated into a lower Chinese domestic / FOB China market and a higher Western (ex-China / CIF) market, most pronounced for the heavy rare earths.
- Sarfartoq is a Western-aligned, non-China source intended for Western processing (proposed Neo/Silmet route). Its realized prices are assessed on a Western sales basis; FOB China is the transparent downside reference, not the mine-gate value.
- On the Western basis the adopted deck is well supported: dysprosium (US\$750/kg) and terbium (US\$3,500/kg) sit at or below observed post-control CIF Europe assessments (≈US\$800/kg and ≈US\$3,625/kg); yttrium is conservative; neodymium and praseodymium carry a strategic-Western premium above the Chinese benchmark and the US\$110/kg policy support reference.
- The deck is adopted as a long-term real Strategic Western basis (gross basket US\$51.88/kg contained TREO), with a Normalized Western case (US\$45/kg) as the principal sensitivity and an FOB China case (US\$32/kg) as the downside. The project is value positive on the adopted basis and on the Normalized Western sensitivity. It is not value positive on the FOB China downside: because the processing toll is fixed in dollars per kilogram, a US\$32/kg basket leaves a net realized price of US\$19.26/kg, and the project does not carry its capital. That result is set out at Item 16.5.3 and is a material feature of the project's price exposure.
- Approximately 92% of basket value derives from the four magnet oxides; the project is in substance a leveraged exposure to the Western magnet-rare-earth market.

C.2 Purpose, sources and basis

This appendix addresses which price basis is appropriate for a non-China producer, the degree of Chinese dominance of the supply chain, and the market evidence for a Western price premium. The principal sources are the Argus Rare Earths analytics (separate FOB China and CIF Europe series), Benchmark Mineral Intelligence (regional bifurcation and public Dy/Tb CIF Europe assessments), Reuters (18 February 2026, NdPr Chinese benchmark and the

US\$110/kg MP Materials support reference), the IEA Rare Earth Elements 2026 framework, USGS statistics and public project disclosures for payability context. The QP has reviewed this material for reasonableness but has not independently verified it. Forecast views are third-party opinions and are not adopted as economic inputs.

C.3 The payable oxides and their role

The revenue model is driven almost entirely by the four magnet oxides. Neodymium and praseodymium together contribute approximately 84.1% of net revenue and terbium and dysprosium a further 8.3% — approximately 92% in total. The low-value light oxides cerium and lanthanum, though approximately 71% of contained mass, contribute only about 3% of value. The economics are therefore a leveraged exposure to the magnet-rare-earth market.

C.4 Price quotation structures and why the basis matters

The price basis must be stated and matched to the project's route-to-market. In a freely supplied market CIF exceeds FOB by freight, insurance and financing only; for compact high-value oxides those costs are small, so a large CIF premium indicates scarcity, export-licensing constraints or strategic willingness to pay, not logistics.

Quotation	Delivery point	Relevance to Sarfartoq
FOB China	Loaded on vessel at a Chinese port	Transparent downside and historical reference; not the value available to a Western processor.
CIF Europe / N. America	Delivered to a Western port	Relevant to a Western route-to-market; since 2025 the CIF–FOB gap has exceeded freight.
Ex-China strategic	Qualified Western supply-chain material	Reflects security-of-supply and qualification premium; the basis on which Sarfartoq is sold.
Long-term offtake	Formula or negotiated	Most relevant to realized revenue once offtake is defined; may carry floors and premiums.

Table C-1. Rare-earth price quotation structures and their relevance to Sarfartoq.

C.5 Chinese dominance of the supply chain

China accounts for roughly 69% of mined rare earth ore, approximately 85% of light-rare-earth refining and separation capacity, and more than 90% of heavy-rare-earth (terbium, dysprosium) supply and has demonstrated willingness to use that dominance as a policy instrument. Separation, metal and magnet capacity outside China is far scarcer than mining; heavy rare earths are the most concentrated and hardest to source ex-China; and export policy can move Western

availability and price sharply at short notice. This concentration is the direct cause of the regional price bifurcation in Section C.6.

C.6 Regional price bifurcation — the evidence for a Western premium

China introduced export controls on selected medium and heavy rare-earth items in April 2025. Benchmark Mineral Intelligence subsequently reported CIF Europe assessments of approximately US\$800/kg for dysprosium oxide and US\$3,625/kg for terbium oxide, with higher episodic Western prices for Dy, Tb and Y in 2026, while Chinese domestic prices remained substantially lower. For NdPr the market is deeper and the differential smaller: Reuters reported a Chinese NdPr benchmark of approximately US\$123/kg in February 2026, above the US\$110/kg support price established for MP Materials — a policy mechanism that provides a visible reference for the cost of sustaining non-China supply.

Oxide	FOB China / domestic	Western ex-China evidence	Deck position
Nd₂O₃ / Pr₆O₁₁	China benchmark ≈US\$123/kg NdPr (Feb 2026)	US\$110/kg MP Materials support reference	Deck 175/165 — strategic-Western premium
Dy₂O₃	Chinese market materially lower	CIF Europe ≈US\$800/kg post-control	Deck 750 — below observed Western CIF spot
Tb₄O₇	Chinese market materially lower	CIF Europe ≈US\$3,625/kg post-control	Deck 3,500 — below observed Western CIF spot
Y₂O₃	Chinese domestic much lower	Large 2026 Western spot dislocation	Deck 16 — conservative vs Western spot

Table C-2. Evidence for regional rare-earth oxide price bifurcation and a Western premium.

C.7 Why the Strategic Western basis is appropriate for Sarfartoq

Sarfartoq is a non-China source in a Western-aligned jurisdiction, adjacent to European markets, with a proposed offtake to Neo Performance Materials for separation at Silmet, Estonia (Items 3 and 16). Its product is intended to be qualified into, and sold within, the Western supply chain. The appropriate realized-price basis is therefore a Western sales basis, not a Chinese domestic basis. Consistent with S-K 1300, the mine plan is set at a reasonable long-term Western value rather than at the highest observable Western spot quotation, with a transparent FOB China downside disclosed alongside it. The price basis and the payability mechanism are matched: the Western premium is taken once, through the oxide price, and partially returned through 75.4% concentrate payability, with recovery applied once and no separate treatment/refining deduction — avoiding double-counting of the premium.

C.8 The adopted deck and the three price cases

The deck is carried as three coherent price cases, each computed through the DCF (after-tax NPV at an 8% real discount rate):

Price case	Basket US\$/kg contained TREO	Net real- ized US\$/kg	After-tax NPV8 (US\$M)	Basis
FOB China (down- side sensitivity)	32.00	19.26	(202)	Chinese domestic / FOB basis; no Western premium
Normalized West- ern (sensitivity)	45.00	32.26	535	Western premium; partial reversion of 2026 heavy spot
Strategic Western (adopted base case)	51.88	39.14	897	Full qualified-Western premium; heavies at or below CIF spot

Table C-3. Adopted price deck and the three price cases.

The Strategic Western deck is the adopted base case. The Normalized Western and FOB China decks are price sensitivities and are reported at Item 16.5.3 and Item 19.7. The project is value positive on the adopted basis and on the Normalized Western sensitivity and is not value positive on the FOB China downside, because the processing toll is fixed in dollars per kilogram and does not fall with the basket.

C.9 Long-term outlook and risks

The structural drivers support a sustained Western premium over the project life: durable magnet demand (electric vehicles, wind, robotics, defence); Chinese export-control and quota policy; the re-routing of Western feedstock away from Chinese separators; and the multi-year lead time for ex-China separation, metal and magnet capacity, expected to reach meaningful scale only in the early-to-mid 2030s. Structural deficits in the magnet rare earths are widely projected through the early 2030s. The QP records four headwinds: substitution and magnet-thrifting could cap heavy-rare-earth intensity; a faster ex-China supply ramp or a relaxation of Chinese export policy could compress the CIF premium; and the heavy-rare-earth premium rests on continued scarcity that is not guaranteed over a multi-decade horizon. These are the reasons the Normalized Western and FOB China cases are carried as sensitivities.

C.10 Qualified Person's opinion

Qualified Person's Conclusion — price basis

In the QP's opinion the Strategic Western deck (gross basket US\$51.88/kg TREO) is a reasonable and justifiable mine plan for the Initial Assessment, on the basis that Sarfartoq is a non-China source intended for qualification into a Western supply chain and is valued on a Western sales basis. On that basis the dysprosium and terbium prices sit at or below observed Western CIF assessments and are well supported, and yttrium is conservative; the neodymium, praseodymium and gadolinium prices carry a strategic-Western premium above the Chinese benchmark and the US\$110/kg support reference and are the principal price uncertainties.

These uncertainties are addressed by carrying the Normalized Western deck (US\$45/kg) as the principal conservative sensitivity and the FOB China deck (US\$32/kg) as the downside, across which the project remains value positive. This appendix, Appendix D and the DCF are on a single consistent basis. Before filing, the Western CIF and NdPr references should be confirmed against a current licensed independent assessment or an advanced offtake term sheet, and the pricing point and reference date stated in Item 16.

C.11 Corroboration of the processing toll from public filings

The payability adopted in this report is derived from a processing toll rather than selected as a percentage (Item 16.7.6). The toll is therefore a load-bearing assumption, and the qualified person has sought to bracket it against evidence that a reader can check. No processor quotation for Sarfartoq concentrate is available at the date of this report. The following is drawn from the lodged financial statements and contract disclosures of listed rare-earth companies and is set out in full, with dated figures and source classifications, in the supporting memorandum referenced at C.12.

Evidence	Indication	Bearing on the adopted toll
Lynas Rare Earths, lodged accounts: integrated cost of production at run-rate	Approximately US\$17–18/kg REO	Implies a Western downstream cracking-and-separation band of roughly US\$11–17/kg once mining and concentration are removed. The adopted base-tier toll of US\$12.74/kg falls inside that band, below its midpoint.
Lynas Rare Earths, lodged accounts: FY25 ramp-year cost	Approximately US\$25.4/kg REO	The delivered-tier stack of US\$25.01/kg adopted in the CIF Europe scenario at Item 19.8 is approximately the whole of that ramp-year cost. The delivered-tier assumption is therefore conservative by construction.
USA Rare Earth / Serra Verde contract disclosure	Contract prices upside expressly “net of separation costs”	Corroborates that a separation deduction of this kind is a real contractual item in Western offtake terms, and not a modelling construct.

Evidence	Indication	Bearing on the adopted toll
Chinese domestic toll tier	Approximately US\$2–4/kg	Explains why payability assumptions in the 85–90% range are commonly encountered, and why they do not transfer to a Western processing stack. A Chinese-tier toll against the adopted basket would imply a payability above 90%; the Western stack does not support it.

Table C-6. Public-filing corroboration of the processing toll. Figures are indicative brackets drawn from third-party filings, not quotations for Sarfartoq concentrate.

How this evidence should be read

This evidence brackets the toll. It does not quote it.

Each figure relates to a different operation, with a different feedstock, flowsheet, product suite, scale and stage of ramp-up from those assumed for Sarfartoq. The companies cited operate integrated businesses, so the separation component has been inferred by deduction rather than reported directly. The figures are dated and will move.

What the evidence establishes is that the adopted toll of US\$12.74 per kilogram is of the right order for a Western downstream stack and is not a figure chosen to produce a favourable payability. What it does not establish is the toll that a counterparty would charge for this concentrate. That remains an outstanding item.

The qualified person regards the corroboration as narrowing, but not closing, the outstanding item recorded at Item 19.9. Two steps would close it: a processor-sourced range obtained through the offtake counterparty when one is appointed, and the segment-level cost disclosures available in the annual filings of integrated Western producers, which permit the separation step to be isolated more directly than the deduction used here. Both are included in the Phase 2 commercial work at Item 23.3.

C.12 Supporting memorandum

The evidence summarised at C.11 is set out in full in a supporting memorandum prepared by Agricola Mining Consultants Pty Ltd and dated 16 August 2026, which records each figure with its date, its source document and a classification of source reliability, together with the steps proposed to harden the estimate. The memorandum is held by the registrant and is available to the qualified person.

APPENDIX D — GLOBAL CARBONATITE REE DEPOSITS: COMPARATIVE CONTEXT FOR THE SARFARTOQ ND-PR DISTRIBUTION

D.1 Purpose and Basis of Comparison

This appendix places the Sarfartoq ST1 deposit in the context of carbonatite-hosted rare earth element (REE) deposits worldwide, with reference to the proportion of neodymium and praseodymium (Nd+Pr) within the total rare earth oxide (TREO) assemblage. The comparison is provided for geological and market context only. It draws on publicly disclosed information of varying vintage, prepared under different reporting codes (S-K 1300, NI 43-101, JORC, and Chinese/Russian national systems), at different cut-off grades, and at different levels of study.

Cautionary Statement

The deposits described in this appendix are separate properties in which the registrant has no interest. Information concerning them has not been verified by the Qualified Person and is not necessarily indicative of the mineralisation, metallurgical performance, or economic outcomes of the Sarfartoq Project. Grade, tonnage, and distribution figures are approximate, are drawn from public sources of varying vintage and reporting standard and are not directly comparable with one another or with the Sarfartoq Mineral Resource Estimate. No inference should be drawn that the Sarfartoq Project will achieve the development status or operating outcomes of any deposit referred to.

D.2 Carbonatites as the Principal Source of Light Rare Earths

Carbonatite and carbonatite-related deposits dominate global supply of the light rare earth elements. The three largest sources of mined REE outside southern China's ion-adsorption clays — Bayan Obo (China), Mountain Pass (United States), and Mount Weld (Australia) — are all carbonatite or carbonatite-derived systems, and the majority of advanced Western REE development projects are hosted in carbonatite complexes.

A structural characteristic of carbonatite REE mineralisation is that the assemblage is strongly weighted toward the low-value light rare earths lanthanum and cerium, which together typically constitute some 60–80% of TREO but contribute little revenue at prevailing prices. The commercially critical magnet-feed oxides, Nd₂O₃ and Pr₆O₁₁, typically constitute only about 15–25% of TREO in carbonatite deposits. Because Nd and Pr carry most of the basket value in current market conditions, the Nd+Pr share of TREO — rather than TREO grade alone — is a first-order determinant of the value of each tonne of contained rare earth oxide.

D.3 The Nd-Pr Distribution at Sarfartoq

The ST1 deposit exhibits an Nd- and Pr-enriched distribution, with Nd₂O₃ constituting approximately 19% and Pr₆O₁₁ approximately 6% of TREO — a combined Nd+Pr share of approximately 25%. This places ST1 at the upper bound of the typical carbonatite range and above the distributions reported for the major producing carbonatites at Bayan Obo and Mountain Pass. Consistent with this distribution, the market analysis in Item 16 and the economic analysis in Item 19 of this report derive most of the basket value (approximately 82%) from Nd and Pr.

Exploration results within the broader Sarfartoq Carbonatite Complex suggest that Nd–Pr enrichment may be even more pronounced elsewhere in the complex. Historical sampling in the ST40 area has indicated Nd₂O₃ on the order of 40% and Pr₂O₃ on the order of 8% of TREO in individual samples. These are exploration results only: the ST40 mineralisation is not classified as a Mineral Resource under S-K 1300, is excluded from the Mineral Resource Estimate, mine plan, and economic analysis of this report, and no inference should be drawn as to its potential contribution, if any, to project economics. The conceptual status of ST40 is discussed in the Future Development Opportunities subsection of Item 21.

D.4 Comparative Table

Table D-1 summarizes published grade and Nd+Pr distribution characteristics for a selection of carbonatite-hosted REE deposits. Figures are approximate and indicative only, subject to the cautionary statement in Section E.1.

Table D-1: Selected Carbonatite-Hosted REE Deposits — Grade and Nd+Pr Distribution (Approximate)

Deposit	Country	Status	Deposit type / principal REE minerals	Grade (% TREO)	Nd+Pr share of TREO²	Derived Nd+Pr oxide grade (%)
Sarfartoq ST1	Greenland	Initial Assessment (this report)	Ferrocarnatite dike swarm; bastnäsite–synchysite–monazite	~1.6–1.7 (Indicated)	~25%	~0.40–0.42
Bayan Obo	China	Producing	Carbonatite-hosted, hydrothermally reworked; bastnäsite–monazite	~3–6	~19–22%	~0.6–1.3

Deposit	Country	Status	Deposit type / principal REE minerals	Grade (% TREO)	Nd+Pr share of TREO ²	Derived Nd+Pr oxide grade (%)
Mountain Pass	USA	Producing	Bastnäsite carbonatite	~7–8	~16–17%	~1.2–1.4
Mount Weld (CLD)	Australia	Producing	Supergene-enriched carbonatite regolith; secondary monazite	~7–11 (Reserve basis)	~23–24%	~1.7–2.5
Ngualla	Tanzania	Development	Weathered bastnäsite carbonatite	~2.2 (Resource); HG zone ~4.3	~21–22%	~0.46–0.49
Ashram	Canada	Development	Carbonatite; monazite–bastnäsite–xenotime	~1.9	~22–23%	~0.42–0.44
Songwe Hill	Malawi	Development	Carbonatite; synchysite–apatite	~1.4	~19–20%	~0.27–0.28
Kangankunde	Malawi	Development	Carbonatite; monazite	~2.9	~20%	~0.58
Araxá (Barreiro)	Brazil	Producing (Nb); REE undeveloped	Weathered carbonatite; Nb (pyrochlore) with REE	REE zones variable (~2.5–13 reported)	~20% (typical)	n/a

Notes: (1) Grades are as published by the respective owners or in technical literature; bases differ (Resource, Reserve, or production head grade) and reporting codes differ; figures are not directly comparable. (2) Nd+Pr share of TREO as reported in, or derived from, published oxide distributions; approximate. (3) Derived illustratively as TREO grade multiplied by Nd+Pr share; not a reported figure for any deposit. Sarfartoq STI figures reflect the Indicated portion of the current estimate and the STI oxide distribution described in Items 11 and 16. All third-party figures to be verified against primary technical reports prior to filing (see Item E.7).

D.5 Discussion — Grade Versus Distribution

The comparison illustrates two distinct dimensions of carbonatite REE deposit quality. The first is contained TREO grade, where the producing deposits — Mountain Pass, Mount Weld, and Bayan Obo — are materially higher-grade than Sarfartoq ST1 and than essentially all Western development-stage carbonatite projects. The Qualified Person make no attempt to minimize this: on a contained Nd+Pr oxide-grade basis (Table D-1, final column), the producing deposits remain superior to Sarfartoq and its development-stage peers.

The second dimension is basket quality — the value of each kilogram of contained TREO — which is governed principally by the Nd+Pr share of the distribution. On this measure Sarfartoq ST1, at approximately 25% Nd+Pr, sits at the top of the typical carbonatite band and above both major producing carbonatites, whose distributions are more strongly weighted to lanthanum and cerium. Among development-stage carbonatite projects, ST1's Nd+Pr share is comparable with or above the strongest peers (Mount Weld ~23–24%, Ashram ~22–23%, Ngualla ~21–22%), and its derived Nd+Pr oxide grade of approximately 0.40–0.42% is within the range of its development-stage peer group.

The practical significance for Sarfartoq is threefold:

- Value concentration. A basket in which approximately one quarter of contained TREO comprises the two principal magnet oxides means that project revenue is concentrated in the deepest and most strategically supported segment of the REE market and is less exposed to the structurally oversupplied La–Ce segment.
- Concentrate marketability. Nd–Pr-weighted feed is the preferred input for Western separation capacity, which is relevant to the offtake framework described in Item 16.
- Sensitivity profile. Because basket value is dominated by two oxides, the economics are transparent: the sensitivity analysis in Item 19 is effectively a sensitivity to the NdPr oxide price, a widely quoted and liquid reference price.

Qualified Person Opinion

The Qualified Person considers that the Nd+Pr share of approximately 25% of TREO at ST1 is a genuine and geologically well-supported point of differentiation for the Sarfartoq Project relative to typical carbonatite REE deposits, while noting that the Project's TREO grade is moderate by comparison with producing carbonatites and that basket quality does not by itself establish economic viability. The economic conclusions of this report rest solely on the analysis in Items 18 and 19 and not on the comparisons in this appendix.

D.6 The Niobium Parallel

Carbonatite complexes are also the world's principal source of niobium, most notably the weathered Barreiro carbonatite at Araxá, Brazil, which supplies most of the global niobium production from pyrochlore. Pyrochlore-hosted niobium mineralisation has likewise been intersected at Sarfartoq within ST1 and the ST1–ST40 corridor. Consistent with the treatment elsewhere in this report, no niobium credit is included in the economic analysis, and the by-product possibility is identified only as a potential future study (Item 21). The Araxá analogue

is noted here solely as geological context for the polymetallic character typical of carbonatite complexes.

D.7 Sources and Verification Status

The third-party figures in this appendix are drawn from publicly available company disclosures, technical reports, and peer-reviewed geological literature, including published descriptions of Bayan Obo, Mountain Pass, Mount Weld, Ngualla, Ashram, Songwe Hill, Kangankunde, and Araxá. Full bibliographic citations will be consolidated into Item 24 (References) of the report.

Third-party grade and distribution figures in Table D-1 are approximate values compiled from public disclosures of varying vintage and reporting code. They are indicative only, are not directly comparable, and are not relied upon for any conclusion in this Technical Report Summary.

Subject to that verification, the Qualified Person consider the comparative picture presented here — a moderate-grade carbonatite with an Nd+Pr distribution at the upper bound of the global carbonatite range — to be robust to reasonable variation in the third-party figures.

APPENDIX E — PROJECT OPPORTUNITIES AND VALUE-ENHANCEMENT PATHWAYS

Opportunities and Value-Enhancement Pathways Summary

- This appendix consolidates the conceptual value-enhancement opportunities identified in Item 21 and the work required to test them (Item 23), in a single view.
- All opportunities are conceptual and qualitative; none is included in the Mineral Resource Estimate, the mine plan, or the economic analysis, and no value is attributed to any of them.
- The mine plan economics in Item 19 stand independently of this appendix and do not rely on any matter described here.

E.1 Purpose and Status

This appendix consolidates, in one place, the conceptual opportunities and potential value-enhancement pathways for the Sarfartoq ST1 Project that are described in Item 21 (Other Relevant Data and Information) and reflected in the recommended work programme in Item 23. It is provided so that a reader can see, in a single view, where future technical and commercial work may add value and what would be required to test each opportunity. It introduces no new economic conclusion and forms no part of the economic analysis.

The mine plan presented in this Technical Report Summary already incorporates several parameters that, on a more conservative basis, might be characterized as upside — including a nominal throughput of 1.4 Mtpa (4,000 t/d), a concentrate payability of 75.4%, a metallurgical recovery of 63.6% TREO, a hybrid/hydro power configuration, and a concentrate-only flow-sheet with no on-site hydrometallurgy. These parameters are part of the certified mine plan (Items 14, 15, 18 and 19); they are therefore not additional opportunities and are not counted again here. The opportunities in this appendix are those that lie beyond the mine plan.

E.2 Cautionary Statement

The opportunities described in this appendix are conceptual in nature and are presented qualitatively only. None has been evaluated through detailed engineering, mine optimization, production scheduling, design-level metallurgical testwork, or economic modelling. No value, revenue, production, tonnage, grade, cost, net present value, internal rate of return, mine-life, or payback effect has been attributed to any opportunity described here, and no such effect should be inferred. Some statements in this appendix are forward-looking; actual outcomes of any future study may differ materially from the possibilities described. The Qualified Person has deliberately excluded these matters from the Initial Assessment because the available information is insufficient to support their incorporation under Subpart 1300 of Regulation S-K. This appendix does not constitute a forecast, a valuation, or investment guidance.

E.3 Priority Technical and Commercial Pathways

The Qualified Person considers that the opportunities most likely to influence future project value, in order of technical priority, are the following. In each case the potential effect is qualitative, and no economic value is attributed.

(a) Beneficiation and metallurgical recovery. Recovery is the Project's binding technical constraint and a material two-sided value driver (Item 19.7). Testwork that defends the adopted recovery assumption is as valuable as testwork that seeks to improve it. A representative flotation and mineralogical programme on fresh, grade-representative material is the highest-priority near-term technical activity (Items 21.1.6 and 23.3).

(b) Commercial and offtake structuring. The mine plan already adopts a 75.4% concentrate payability; no further payability improvement is assumed. Any additional commercial value would arise from offtake structuring — for example, toll-separation or direct sales of separated products — rather than from a higher assumed payability and would not require Project capital. Full separated-oxide value cannot be claimed by assumption; it can be earned only by bringing separation and its associated costs inside the Project boundary, which the current flowsheet excludes (Item 21.1.8). Payability levels above and below the derived 75.4% are reflected in the revenue sensitivity in Item 19.7 and are not incorporated in the mine plan.

(c) ST40 zone and the ST1–ST40 corridor. This is the only identified pathway with the potential to change the Project's value class, and it is an exploration proposition, not a modelling adjustment. It requires ST40 to be drilled to a classifiable standard, a revised Mineral Resource Estimate, and a demonstrated blend schedule before any effect on basket value or economics could be assessed. Assertions that blending ST40 would double or triple basket value are not supported by the oxide distribution and are not adopted (Item 21.1.2).

E.4 Opportunities Register

Opportunity	Category	Status vs. mine plan	Nature of potential effect (qualitative)	Work required to test	Indicative timeframe
ST40 zone / ST1–ST40 corridor	Exploration / Resource	Excluded (no classified Resource)	Potential step-change via higher Nd–Pr blend; magnitude not estimable until classified	Resource-definition drilling; revised MRE; block-model blend schedule	18–24 months
Higher-grade early scheduling	Mine planning	Not in mine plan	May improve early cash flow / pay-back if achievable from the block model	Mine optimization & production scheduling under geotechnical/dilution constraints	Next study phase
Recovery improvement (above 63%)	Metallurgy	Not in mine plan (upside)	Two-sided value driver; upside only if 62–64% validated on representative material	Locked-cycle & pilot test-work on fresh, grade-representative composite	6–12 months
Recovery defence (protect 63%)	Metallurgy (risk)	mine plan assumption	Protects against material downside if recovery underperforms	Same programme as above; mineralogical zoning of feed	6–12 months (highest priority)
Offtake / payability structuring	Commercial	mine plan = 75.4% payability	Potential improvement via structuring; no capital; ceiling without in-scope separation	Marketing study; offtake negotiation	Parallel / ongoing
Niobium by-product	Metallurgy / Product	Excluded	Option value only; none assumed	Recovery test-work; product specification	Next study phase

Opportunity	Category	Status vs. mine plan	Nature of potential effect (qualitative)	Work required to test	Indicative timeframe
Heavy rare earth (Tb, Dy) upside	Exploration	Already priced in ST1 basket; exploration at ST19, ST37/43	No incremental ST1 value; exploration upside at satellite targets	Exploration drilling at satellite targets	Longer term
Hybrid renewable power	Infrastructure	Hydro/hybrid assumed in mine plan	May further reduce operating cost / emissions	Wind/hydro–diesel trade-off study & costing	PFS
Throughput expansion (beyond 1.4 Mtpa)	Mine / Process	1.4 Mtpa is the mine plan	Conceptual expansion optionality; resource-confidence dependent	Trade-off study; resource confidence; capital estimate	PFS / later
Resource classification upgrade	Resource	Enabler, not a direct lever	Prerequisite for Mineral Reserves; not itself value	Staged infill drilling (Inferred→Indicated→Measured)	PFS 2027–28
Greenland tax-rate confirmation	Fiscal (risk)	25% modelled	Downside if 30% confirmed; resolves an economic uncertainty	Greenland tax-adviser confirmation	Immediate

Table E-1. Opportunities register.

Note: Identification of an opportunity does not imply that it will be pursued, that its outcome would be favorable, or that any economic benefit would result. Categories and timeframes are indicative only. This register attributes no monetary value, net present value, or rate-of-return effect to any item.

E.5 Qualified Person' Statement

The Qualified Person confirm that the opportunities described in this appendix are conceptual, that they have not been relied upon in forming any conclusion or recommendation elsewhere in this report, and that the results of the Initial Assessment stand independently of them. No

quantitative value should be attributed to any matter described here. The mine plan economic analysis is founded exclusively on the current Mineral Resource Estimate and the assumptions documented in this report, and the cautionary statements applicable to an Initial Assessment (Items 1 and 19) apply to this appendix in full.

APPENDIX F — DATA VERIFICATION: 2023 DRILLING QA/QC REVIEW

The QA/QC data reproduced here are drawn from and rely upon the MRE TRS (Sarfartoq Rare Earths Project Mineral Resource Estimate Technical Report Summary (file 704-ENG.VMIN03496-01), effective 31 July 2026, issued for use 16 August 2026; Ronald G. Simpson, P.Geo., GeoSim Services Inc., and Hassan Ghaffari, P.Eng., M.A.Sc., Tetra Tech Canada Inc.), which is the primary source and governs in the event of any difference.

Attribution notes

This appendix summarizes the data-verification (QA/QC) work presented as Item 13 of the Technical Report on the Sarfartoq Project, West Greenland — 2025 Update, prepared for Neo North Star Resources, Inc. by FGS / Felsman Geologic Services, Damien Consultants, GeoSim Services Inc. and J.R. Goode & Associates (lead author J. Felsman). It is not work of Tetra Tech; Tetra Tech (Wardrop) authored the 2011 Sarfartoq PEA. The Qualified Person responsible for the Mineral Resource Estimate is R.G. Simpson, P.Geo. (GeoSim Services Inc.).

F.1 Basis and Purpose

This appendix presents the data-verification and quality-assurance/quality-control (QA/QC) review undertaken in support of the ST1 Mineral Resource Estimate (Item 11). It records the verification steps completed to date, the results obtained, and the limitations that remain, so that the reader can assess the adequacy of the drill-hole database on which the Initial Assessment relies. It should be read together with Items 7 (Exploration), 8 (Sample Preparation, Analyses and Security) and 9 (Data Verification).

F.2 Scope of Verification

The verification covers the 2023 NNSR ST1 diamond-drilling programme, with historical context from the 2009–2012 Hudson programmes. It comprises certified reference materials (standards), blanks, field and laboratory duplicates, inter-laboratory check assays, core-recovery records, and site visits. The primary laboratory was ALS; the secondary (check) laboratory was Activation Laboratories (Actlabs).

Control	2023 programme	Historical context	Outcome
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Standards (SARF-1 CRM)	51 (ALS); 5 (Actlabs)	2009 OKA-2; 2011 SARF-1 (279 inserted)	Mean REE within 2 SD at both labs; Th mean fails at ALS (37/51 CRMs > 2 SD)
Blanks (quartz vein)	52 (5 to Actlabs)	2011: 277 gneiss blanks	REE 2–3 orders of magnitude below mineralisation; no contamination; blank un-certified
Field duplicates (¼ core)	51	2011: R ² 0.91 / 0.94	Good correlation; scatter attributed to cm-scale heterogeneity
Check assays (ALS↔Actlabs)	102 (incl. 6 dup, 5 std, 5 blank)	2009: 18 pulps to ACME	Good for La–Nd and Y; ALS systematically over-estimates REE (unresolved)
Core recovery	Whole programme	—	Median > 99.5%; overall ~95% (overburden losses)

Table F-1. Data-verification and QA/QC summary.

F.3 Standards (Certified Reference Materials)

The 2023 programme used a single certified reference material, SARF-1, prepared by CDN Resource Laboratories from mineralized ST1 carbonatite and certified by Smee & Associates (2011). Of 51 SARF-1 CRMs analyzed at ALS, the mean REE results fell within two standard deviations of the certified values, and no REE result exceeded 20% variance; variances above 10% were rare. Thorium was the exception: 37 of 51 ALS results fell outside two standard deviations and 35 of 51 exceeded 10% variance. Actlabs (5 CRMs) out-performed ALS on accuracy. The certified values are summarized below.

Analyte	La	Ce	Pr	Nd	Sm	Eu	Dy	Th
Certified mean (ppm)	2,665	6,768	746	2,615	235	50.9	25.5	442
Two std. dev. (ppm)	196	572	62	272	16	2.8	2.2	46

Table F-2. SARF-1 certified values and two-standard-deviation limits. The earlier OKA-2 standard used in 2009 was noted to be a poor match for Sarfartoq mineralisation. The SARF-1 CRM, while project-specific, is a single, internally derived standard.

F.4 Blanks

Blank material comprised hand-collected milky quartz-vein material from a site ~425 m north-west of the camp. Both laboratories confirmed rare-earth concentrations two to three orders of

magnitude below both the SARF-1 certified values and the grades used in ST1 resource modelling, and no contamination was flagged. The blank material is not certified, and its source had not previously been analyzed, so accuracy cannot be assessed; only precision and source variability were evaluated.

F.5 Duplicates

For the 2011 programme, field duplicates returned correlation coefficients of $R^2 = 0.91$ (Actlabs) and 0.94 (ALS), and laboratory prep and pulp duplicates $R^2 = 0.96$ –0.998. In 2023, 51 field duplicates were taken by re-splitting the archive quarter-core; ALS results showed good correlation between primary and duplicate samples, with individual-pair scatter attributed to centimeter-scale heterogeneity of the mineralisation.

F.6 Check Assays (Inter-laboratory)

In 2023, 102 check samples (including 6 duplicates, 5 SARF-1 standards and 5 blanks) were analyzed at the secondary laboratory. Correlation between ALS and Actlabs is very good for La, Ce, Pr, Nd and Y — the elements that dominate the Sarfartoq rare-earth budget and the project economics — with drill-core variance for La–Nd ranging –18% to +15% (average –3%) and not exceeding 20% for any sample. Correlation weakens for the low-abundance heavy rare earths, which have little economic impact. Niobium, thorium and uranium correlated well between the laboratories.

The review identified that, relative to Actlabs, ALS (the primary laboratory) consistently overestimates rare-earth concentrations by a small amount, most pronounced at higher grades. The authors note that this “warrants further investigation, as lab selection could impact project economics.” The five standards submitted as checks were not true check analyses, because the original SARF-1 material had been fully consumed at ALS and fresh sachets were submitted to Actlabs.

F.7 Core Recovery

Median core recovery exceeded 99.5% with a mode of 75%; overall recovery was just over 95%, the reduction being attributable to near-surface overburden and unconsolidated sediment (locally up to 27 m) at the start of holes, and minor broken ground in fenitized granite rather than in the carbonatite host.

F.8 Site Visits

J. Felsman (project manager) was on site throughout the 2023 and 2024 programmes, overseeing sampling. Dr. M. Druecker visited on multiple occasions in 2010–2011. R.G. Simpson (GeoSim), who prepared the Mineral Resource Estimate, visited the project on 7–9 September 2010 and collected three core samples from two holes, the rare-earth results of which were consistent with the reported interval grades.

F.9 Findings, Limitations and Qualified Person's Opinion on Adequacy

On the evidence reviewed, the standards, blanks, duplicates and check assays are internally consistent, no sample mix-ups or losses were identified, and the drill-hole database is considered adequate to support the current Initial Assessment. The following limitations are, however, disclosed and are addressed in the recommended data-verification programme (Items 9.3 and 23.2):

- Independence. The verification narrative was led by the geologist who managed and directed the 2023–2024 drilling and sampling; it is therefore an internal review rather than a fully independent verification. The authors expressly state that the conclusions “should be corroborated by an experienced geochemist before publicly reporting any drill data or resource estimates.”
- Primary-laboratory bias. The systematic over-estimation of rare-earth grades at the primary laboratory (ALS) is unresolved and could affect reported grade and, in turn, the economic analysis; it requires resolution (including possible umpire assaying) before public reporting.
- Thorium performance. The elevated thorium failure rate at ALS (37 of 51 CRMs) is unresolved and is relevant to naturally occurring radioactive material (NORM) management (Item 17).
- Reference-material and blank basis. A single, internally derived CRM (SARF-1) and an uncertified blank were used; the standard check was not a true inter-laboratory check because the reference material was consumed at the primary laboratory.
- Analytical method. Confirmation and documentation of the total-dissolution (fusion) analytical method across campaigns remains outstanding (Item 8).
- Independent site inspection. A current independent Qualified Person site inspection covering the 2023 programme remains outstanding; the resource Qualified Person's site visits pre-dates the 2023 drilling.

The signing QP for this TRS has not personally inspected the property. The QP considers the multiple inspections by the resource QP and prior authors, supported by extensive drill core photography, logging, and QAQC data, to provide a sufficient basis for an Initial Assessment; however, a personal inspection by the signing QP is recommended prior to any Pre-Feasibility TRS.

In the Qualified Person's opinion, the data are adequate for the purposes of this Initial Assessment, which may rely in part on Inferred Mineral Resources, but are not yet sufficient to support a public, S-K 1300-compliant Mineral Resource Estimate until the limitations above are closed. This appendix does not, by itself, discharge the data-verification requirement for a compliant Mineral Resource; that is completed through the programme in Item 23.2 and the resource Qualified Person's restatement.

F.10 Qualified Person's Statement

The information in this appendix is derived from the 2025 Technical Report data-verification work identified in Section F.1 and from the registrant's records and is presented in accordance with Item 9 and the reliance framework in Item 25. The Qualified Person has disclosed the limitations of that work and has not relied upon any unverified datum in a manner that would render this report misleading. The mine plan conclusions of the Initial Assessment are subject to completion of the data-verification programme and the S-K 1300-compliant restatement of the Mineral Resource Estimate.

APPENDIX G — THE REGISTRANT'S CONCEPTUAL MINE PLAN

Based on the ST1 hybrid Mineral Resource case (open pit then underground) · August 2026

Status of this Appendix

This Appendix describes a conceptual mine plan: the long-term development of the property as the registrant envisages it, extending beyond the Mineral Resource presently estimated. It is included because the registrant's development intentions are material to an understanding of the property and are referred to in the body of this report.

It is not an economic analysis and does not purport to value the property. The economic analysis of the Sarfartoq ST1 Project is that reported in Item 19, which is founded exclusively on estimated Mineral Resources. Nothing in this Appendix qualifies, supplements or amends it, and nothing in this Appendix is additive to it. The indicative amounts in Item G.5 are conditional outcomes of a risk simulation, are rounded, and are not a net present value of the property.

The conceptual mine plan described here depends substantially on material for which NO MINERAL RESOURCE HAS BEEN ESTIMATED. There has been insufficient exploration to estimate a Mineral Resource for that material, and it is uncertain whether further exploration will result in the estimation of a Mineral Resource. Until it is so estimated it cannot be scheduled in a mine plan, costed, or included in any economic analysis, and the Qualified Person has not done so.

G.1 Purpose and basis

The registrant acquired the property with a view to developing it over a longer horizon and at a larger scale than the currently estimated Mineral Resource by itself supports. That view rests on a set of specific technical and commercial propositions about the property, which the registrant set out when commissioning the 2026 technical work.

This Appendix records those propositions, states the Qualified Person's independent assessment of each, describes the conceptual mine plan that would follow if they were resolved favourably, and indicates the range of outcomes that plan could produce and the probability attaching to them. The Qualified Person prepared this Appendix and accepted responsibility for it, including for the assessments in Item G.3. Where the Qualified Person does not accept a proposition advanced by the registrant, that is recorded.

G.2 What is presently established

An estimated Mineral Resource exists at ST1 in Indicated and Inferred categories, in spatially exclusive and additive open-pit and underground components (Item 11); bench-scale metallurgical testwork establishes flotation as an effective beneficiation route (Items 10 and 14); and

an initial assessment founded exclusively on that Mineral Resource supports the conclusion that it has reasonable prospects for eventual economic extraction (Item 19). What is established therefore supports the hybrid open-pit-then-underground operation described in Item 13. The conceptual mine plan in this Appendix is a proposition about what might be established in addition to it.

G.3 The registrant's propositions and the Qualified Person's assessment

The registrant identified twelve matters in which it considers the long-term configuration of the property may differ materially, and favourably, from the configuration evaluated in the 2011 Preliminary Economic Assessment. They are summarised below with the Qualified Person's position on each. Four have been adopted in this Initial Assessment because the evidence supported them; two are adopted in principle but require definition; four remain open and are addressed in the work programme in Item 23; two are not, in the Qualified Person's opinion, supportable as advanced.

Proposition advanced by the registrant	Qualified Person's position
ST40 carries a markedly higher neodymium–praseodymium proportion and blending it would raise concentrate value	Geologically credible and the most interesting feature beyond the estimated Mineral Resource. The characterisation that blending would double or triple basket value is NOT accepted. No Mineral Resource exists at ST40, so no blend can be scheduled. OPEN
A starter pit could be redrawn to target a materially higher head grade in the early years	Sound in principle and ordinary practice but constrained by what the block model delivers under practical selectivity and dilution. An objective for pit optimisation, not an assumption. OPEN
A concentrate-only flowsheet avoids on-site hydrometallurgical and acid-plant infrastructure	Agreed and ADOPTED. The most consequential structural improvement over the 2011 configuration. See also Item 21.1.8, in which on-site conversion was evaluated and not adopted
Western supply-chain positioning supports payability far above the 2011 assumption, at full payability against separated oxide prices	The Strategic Western price basis is ADOPTED. Full payability against separated oxide prices is NOT accepted: the registrant would sell a flotation concentrate, not separated oxides
Mineralogically zoned mining would improve recovery and concentrate grade	One of the more promising and least explored propositions. Requires a mineralogical model of the deposit, which does not exist. OPEN

Proposition advanced by the registrant	Qualified Person's position
Underground mining may compare more favourably than unit cost suggests; a hybrid sequence should be evaluated	Agreed and ADOPTED. The trade-off has been run. The underground estimate has been re-cut so that the stope shapes lie wholly beneath the base of the optimized pit shell with an exclusion zone at the interface, which makes the open-pit and underground inventories spatially exclusive and additive, and a hybrid sequence — open pit in Years 1 to 4, underground long-hole stoping in Years 4 to 7 — is the mine plan evaluated in Item 19. The underground component supplies 4.918 Mt, being approximately 40 per cent of life-of-mine mill feed. The underground mining rate and development capital remain benchmark figures without geotechnical support, and that limitation is disclosed in Items 18, 19.8 and 22.8
Niobium should be evaluated as a by-product	Presence not in question; recoverability entirely untested. Genuine option value, no basis for quantification, no credit taken. OPEN
Heavy rare earths contribute disproportionately, and enrichment exists elsewhere on the Licence	The disproportion is real and already reflected in the adopted basket. Spatial variation has never been characterised. OPEN
Hybrid renewable power would reduce operating cost	Agreed and ADOPTED in principle; no power study exists and a diesel fallback would add materially to cost
Containerised concentrate export is a lower-risk logistics chain	Agreed and ADOPTED in principle; sealift window, port handling and inventory holding remain to be defined
Regional occurrences represent future feed sources	Agreed the potential is real; almost entirely untested and insufficient even to state an exploration target. OPEN
A classification pathway should target Mineral Reserves at pre-feasibility	Agreed without qualification, and the most important item on the list. Forms the first phase of Item 23

Table G-1. The registrant's propositions and the Qualified Person's position on each.

The Qualified Person records that each proposition was assessed on its technical and commercial merits, and that no assumption adopted in this Initial Assessment was selected to produce a particular economic result.

G.4 The conceptual mine plan

If the open propositions were resolved favourably, the configuration the registrant envisages is a longer-life operation in three successive phases. The middle phase is the hybrid open-pit-then-underground operation already evaluated in Item 19; the first and third phases rest on material for which no Mineral Resource has been estimated.

Phase	Source of feed	ROM (Mt)	Grade assumed	Classification status
Early	Higher-grade satellite material, principally ST40	2.45	2.5% TREO (assumed)	NOT a Mineral Resource — exploration target
Middle	The ST1 hybrid operation — open pit then underground	12.207	1.2591% TREO (delivered)	Mineral Resource (Item 11) — the material evaluated in Item 19
Later	The volume beneath the base of the re-cut underground inventory	5.484	1.51% TREO (assumed)	NOT a Mineral Resource — conceptual
Total		16.9564		53% Mineral Resource / 47% not a Mineral Resource

Table G-2. The conceptual mine plan by phase. The middle phase is the hybrid open-pit-and-underground operation evaluated in Item 19 and is Mineral Resource in full. The first and third phases rest on material for which no Mineral Resource has been estimated. The third-phase inventory is stated at 5.484 Mt, because the 5.066 Mt difference has since been estimated as underground Mineral Resource and is scheduled in Item 19; it cannot be counted twice. Compare Table 13-1, in which 100% of the material scheduled in the mine plan evaluated in Item 19 is Mineral Resource.

The logic of the sequence is conventional: place the highest-grade material first, mine the open pit while it is available, and follow it with underground mining at progressively greater depth. The hybrid transition from open pit to underground has already been adopted in the mine plan evaluated in Item 19; what remains conceptual is the satellite start-up ahead of it and the deeper

underground extension beneath the re-cut inventory. The Qualified Person considers the sequence sound as a concept. The work required before either conceptual phase could be scheduled is set out in Item G.6.

G.5 Why no range of outcomes is presented for the conceptual mine plan

Position of the Qualified Person

No economic analysis of the conceptual mine plan appears in this Appendix or anywhere in this report. No net present value, internal rate of return, payback period, cash flow or other measure of economic value is attached to the ST40 satellite material, to the inventory beneath the ST1 pit shell, or to any combination of either with the ST1 Mineral Resource.

The registrant asked that this Appendix indicate the scale of the opportunity that the conceptual mine plan represents. This report does not respond to that request with a table of probability-weighted net present value outcomes, conditional on the conceptual sources converting to Mineral Resources. That table has been withdrawn in its entirety, together with the figures derived from it.

Targeted drilling is intended to increase drill density in selected priority areas and support a future resource-classification review. If supported by the resulting information and the responsible Qualified Person's subsequent estimation and classification, a Mineral Resource Estimate might be established.

The qualified person has concluded that presenting such a range would be inconsistent with 17 CFR 229.1302(c)(2)(iv), which requires an exploration target to be accompanied by a statement that it does not represent, and should not be construed to be, an estimate of a mineral resource or mineral reserve.

A net present value is an estimate of economic value. Attaching one to material that is expressly not a Mineral Resource conveys precisely what that provision is designed to prevent, however carefully the figure is captioned and however clearly the attaching probabilities are disclosed.

Two further considerations support that conclusion. The conversion probabilities on which any such range would depend are matters of judgement rather than measurement; they are not derived from an estimate prepared to the standard of subpart 1300 and they cannot be independently verified. And the presentation of such outcomes adjacent to the economic analysis of the Mineral Resource in Item 19 creates a material risk that a reader will carry a figure from the conceptual scenario into the reportable economics of the property.

The exploration target underlying the first and third phases of the conceptual mine plan is presented at Item 21.2 and at G.7 below as ranges of tonnage and grade only, with the cautionary statements required by 17 CFR 229.1302(c)(2)(i) to (iv). The work that would be required before any part of it could support an economic analysis is set out at G.6.

The qualified person records that the levers capable of changing the economics of the estimated Mineral Resource itself, being commodity price, metallurgical recovery, payability and the discount rate, are quantified in Item 19.7 and in the price scenario at Item 19.8, where they properly belong. The levers described in this Appendix require new rock or third-party action, and no economics attach to them here.

G.6 What would be required before any of this could be reported as an economic analysis

	Satellite material	Below-pit volume
1	Drill at a spacing sufficient to demonstrate geological and grade continuity	Drill beneath the lowest scheduled stope horizon to test the volume lying below the re-cut underground inventory
2	Construct a block model, apply a cut-off grade, estimate and classify under subpart 1300	Drill sufficiently to support estimation of that deeper volume
3	Metallurgical testwork on representative composites of barite-bearing feed	Estimate and classify the deeper inventory as a Mineral Resource, on a basis spatially exclusive of the inventory already scheduled in Item 19
4	Pit optimisation, geotechnical characterisation and a haulage solution to the plant	Extend the underground geotechnical characterisation, method selection, stope and pillar design, backfill, ventilation and dewatering study to the greater depth
5	Schedule into a mine plan and evaluate	Schedule into a mine plan and evaluate

Table G-4. Steps required before a conceptual source could be scheduled and evaluated.

Until those steps are complete for a given source, that source may not be scheduled in a mine plan, costed, or included in any economic analysis, and no value may be attributed to it. Only when the material scheduled in a mine plan is Mineral Resource can the resulting cash flow be reported as an economic analysis under subpart 1300 of Regulation S-K.

G.7 Exploration target — cross-reference

The exploration target relating to the ST40 occurrence and to the ground beneath the base of the underground component of the hybrid Mineral Resource is disclosed in full at Item 7.10, which is the single separately captioned section contemplated by 17 CFR 229.1302(c)(2) and which carries the four cautionary statements required by paragraphs (c)(2)(i) to (iv) and the four content requirements at paragraphs (c)(3)(i) to (iv).

It is not repeated here. No tonnage, grade, quantity or value for the exploration target is stated in this Appendix.

G.8 Qualified Person's statement

Qualified Person Opinion G-1 — this Appendix

I prepared this Appendix at the request of the registrant to record its conceptual mine plan, the technical and commercial propositions on which that plan rests, and the range of outcomes it could produce. I assessed each proposition independently and my position is stated in Item G.3, including in the two instances in which I do not accept the proposition as advanced.

I record that the hybrid open-pit-then-underground sequence has been adopted: in the hybrid scenario reported in the MRE the underground stope shapes lie wholly beneath the base of the optimized pit shell with a 20 m exclusion zone at the interface, the two components are spatially exclusive and additive, and both are scheduled in the economic analysis in Item 19. The conceptual inventory in this Appendix is stated at 5.484 Mt, so that no tonne is counted both as Mineral Resource and as conceptual material.

The amounts stated in Item G.5 are conditional outcomes of a risk simulation. They are not a valuation of the property, they are not an economic analysis for the purposes of subpart 1300 of Regulation S-K, and they are not additive to the economic analysis in Item 19, which is founded exclusively on estimated Mineral Resources and remains the economic analysis of the Sarfartoq ST1 Project. I have presented the amounts together with the probability attaching to each outcome, because in my opinion a conditional range cannot properly be disclosed without the conditions.

In my opinion the long-term potential of the property is real and warrants the exploration expenditure recommended in Item 23. In my opinion that potential is not presently capable of being valued, and the appropriate response to it is to test it by drilling rather than to report it as value.

**BDO REPORT - Terms on royalty - Appendix 2 to addendum
no. 3 of 1 July 2014 for Exploration Licences for Minerals
Greenland**

Major Precious Greenland A/S
Att.: Bo Møller Stensgaard, chairman of the board

19th August 2026

Terms on royalty - Appendix 2 to addendum no. 3 of 1 July 2014 for Exploration Licences for Minerals Greenland

We have today been asked to provide our opinion on the list of questions raised below.

This opinion is strictly limited to the matters stated herein and may not be read as extending by implication to any matters not specifically referred to.

Our Opinion is confined to and given on the basis of Greenlandic law in force at the date hereof as currently applied by the Greenlandic courts. We express no opinion as to the laws of any other jurisdiction or the effect thereof.

1. WHICH ROYALTY REGIME APPLIES. Please confirm, by reference to Addendum No. 3 to the Standard Terms (in force 1 July 2014) and its Appendix 2 (rare earth elements), which royalty terms would govern an exploitation licence deriving from MEL 2020-32. **Specifically:** does ANY surplus royalty apply to a rare-earth-elements licence, or is the 15%-above-40%-margin surplus royalty a term of the gemstone appendix only? Our understanding is that surplus royalty only is for gemstones.

Answer:

The surplus royalty only applies to licenses with the permission to extract gemstones.

2. IF A SURPLUS ROYALTY APPLIES. Should any margin-based surplus royalty in fact apply: (a) is the sales royalty deductible in computing the surplus-royalty base; (b) is sustaining capital deductible; and (c) is the 40 per cent margin threshold measured on gross revenue or net realised revenue?

Answer:

N/A. - see under Question #1.

3. THE TAX OFFSET AGAINST THE SALES ROYALTY. Sections 2.27 to 2.32 of Appendix 2 provide a royalty conversion mechanism. Our reading of it is as follows, and we would be grateful for confirmation or correction rather than a restatement from first principles.

A Basic Royalty Amount is computed for each calendar year under sections 2.03 and 2.28 as 5 per cent of the total value of Minerals sold and considered sold, with no deduction for cost or expense other than freight as provided for under sections 2.21 to 2.25 (section 2.26). A Royalty Conversion Amount is computed under section 2.29 as the sum of the licensee's corporate income tax and corporate dividend withholding tax actually paid or to be paid. The Payable Royalty under section 2.30 is the Basic Royalty Amount less the Royalty Conversion Amount, floored at nil, with an express prohibition on carry-back, carry-forward or any other transfer of a negative amount between years. Section 2.32 then requires an Additional Payable Royalty where the aggregate of Payable Royalty, corporate income tax and dividend withholding tax for a year falls below the Basic Royalty Amount. Section 2.46 preserves the obligation to pay tax in addition.

Our understanding is therefore that the aggregate payable to Greenland in any calendar year is the greater of 5 per cent of Minerals sold and considered sold or corporate income tax plus dividend withholding tax; that the 5 per cent royalty accordingly operates as a minimum annual payment on the combined take rather than as a charge additional to income tax; that where corporate income tax and dividend tax alone exceeds the Basic Royalty Amount in a year no royalty is payable for that year; that unused offset is lost and cannot be carried in either direction

Answer:

We can confirm the above understanding

(a) Order of computation. Where the Payable Royalty is itself deductible in computing taxable income, the royalty and the tax are mutually dependent. Please confirm whether the royalty is deductible for corporate income tax purposes and, if so, whether the computation is to be solved simultaneously for the year or on a prescribed sequence.

Answer:

The following is our understanding of the Royalty regime: Corporate income tax is unavoidable by law, whereas the Royalty is a licence condition laid down under appendix 2 to addendum no. 3 of 1 July 2014 to the Standard Terms for Exploration Licences for Minerals (excluding hydrocarbons) in Greenland. The Royalty shall be considered as an ordinary expense, which serves as a minimum government take of 5% of the value of the Minerals sold and considered sold. If the Company is charged corporate income tax and or dividend tax, then the Royalty is reduced until the combined payment reaches the minimum Government take as described above. The Royalty cannot be negative.

The Royalty is thus a deductible expense. Our understanding is that in year where corporate income tax and or dividend tax applies it is an iterative process for calculating the Royalty, as the combined corporate income tax, the dividend tax and the Royalty shall meet the threshold for minimum government take as described above.

4. WHERE MINERALS ARE PROCESSED OUTSIDE GREENLAND. Section 2.05 deems Minerals sold when loaded on board a ship for transport out of Greenland, and section 2.06 provides that section 2.05 does not apply to Minerals processed in another state where that processing

is performed in accordance with an approval granted by the MRA. Our plan of operations contemplates shipping a flotation concentrate for cracking and separation outside Greenland. Please advise how the royalty base is determined in that case, both with and without an approval under section 2.06; what the application process and realistic timetable for such an approval are; and whether the point of valuation changes as a result. We also note that freight is deductible under sections 2.21 to 2.25 where the sales price includes it and the named Incoterms apply and would welcome confirmation of how that operates on a CFR or CIF sale into Europe.

Answer:

Our understanding is that such arrangements are only possible after negotiations and agreement with Government for changed licence conditions including the royalty arrangement attached to such conditions.

Most likely processing outside Greenland may be allowed under the conditions that the processing is an add-on cost, and the material remains under the Company's control. This also means that the Royalty "point" is postponed until sale to an independent 3rd person.

If the licensee as seller shall bear the freight costs (to named port of destination/delivery) as is the case under "CFR" and "CIF" (named port of destination/delivery) such freight costs may be deducted from the sales price in the calculation of the value of the minerals sold. Also, not that any terminal charges and similar costs are typically not included in the freight and will be at the buyer's expense, along with customs clearance, delivery etc.

5. CORPORATE INCOME TAX AND DEPRECIATION. Please confirm the 25 per cent corporate income tax rate, and advise on the following:

a) the depreciation rates and methods applicable to each relevant class of asset – plant and equipment, buildings, vessels, and mine development – and whether the taxpayer may elect between methods;

Answer:

Plant and equipment + intangible assets: 30% diminishing balance

Buildings: 5% straight line

Vessels: 10% straight line

The percentage is the maximum per year.

b) whether additional or accelerated depreciation of up to 50 per cent of taxable income in a year is available, on what conditions, whether it may be allocated across asset classes at the taxpayer's election, and whether it accelerates the deduction or increases the aggregate amount deductible;

Answer:

Not an option any longer.

c) the treatment of pre-production exploration expenditure and of mine development expenditure – whether deductible, depreciable or carried forward;

Answer:

Exploration expenditures are treated as cost and deductible right away.

Mine development is a broad term. If development expenditures are related to one of the assets classes mentioned above, then attached to this. If more like exploration, then deductible right away.

d) *the applicable loss carry-forward period. Our understanding is that mineral exploration and exploitation companies may carry losses forward without time limitation, but we have seen that statement made subject to a qualification we have not been able to identify. Please state the rule, the authority for it, and any conditions, including whether any change-of-control restriction applies under Greenland law; and*

Answer:

The Company may carry to tax loss forward without time limitations. However, if the Company changes the main activity (i.e. to property investment), or the ultimate shareholders changes more than 1/3, then it is necessary to apply for a permit to preserve the tax losses. In the case of major changes in activity, it is more likely than not that the permit is not granted whereas in the case of changes in shareholders it is more likely to be granted.

e) *whether the ad valorem royalty and the closure and reclamation provision are deductible in computing taxable income, and if so when.*

Answer:

Reclamation provisions which are claimed secured by an escrow account by the Government are deductible in the year paid into the escrow account.

f) *CORPORATE INCOME TAX CONFIRMATION. Please confirm the 25% corporate income tax rate, the availability of 25% straight-line depreciation on mining assets capped at cumulative expenditure, and indefinite (or the applicable) loss carry-forward.*

Answer:

The tax rate is 25% under the condition that corporate income tax is paid on account before the end of the fiscal year in question. If the corporate income tax is not paid on account, then the tax is due for payment 20 November in the subsequent year, with an additional interest payment of 6% - which equals an effective tax payment of 26.5%

Add 1) THE ROYALTY BASE - express confirmation.

Please confirm expressly that, for a flotation concentrate sold to an independent buyer, the "value of Minerals sold and considered sold" is the invoice sales value of the concentrate as sold, and not a notional value of the contained rare-earth oxides.

Answer:

We agree that the invoice sales value on minerals sold to an independent buyer shall be used when calculating the Royalty, provided

- "Mineral" means a mineral or a metal, respectively, which is exploited under the licence, as defined in section 1.01(h), and is, or can be processed into, a rare earth element, cf. section 1.01(j),
- The value of Minerals sold shall be determined with reference to the volume of Minerals considered sold under this Article 2, see sections 2.04-2.12, cf. section 2.13, and
- The volume of Minerals sold shall be determined with reference to the weight measured in kilogram or dry metric tonnes, cf. section 2.09.

Add 2) THE CONCRETE LICENCE - express confirmation.

Please confirm that MEL 2020-32 incorporates the Standard Terms and Addendum No. 3 (1 July 2014) with its Appendix 2 (rare earth elements), and that those royalty terms carry to the exploitation licence granted on transition, noting any basis on which the MRA could impose different terms at grant.

Answer:



Agricola Mining Consultants Pty Ltd - ABN 84 274 218 871
PO Box 473 South Perth WA 6951 – Mobile: +61 4 1234 7511
Email: mcastle@castleconsulting.com.au

We can confirm this understanding. The licence document and related addenda all refer to the Standard Terms and Addendum No. 3 (1 July 2014) with its appendices 1-4 (appendix 2 relates to rare earth elements).

Add 3) TIMING UNDER SECTION 2.29.

Please confirm whether a calendar year's Royalty Conversion Amount is 1) the corporate tax accrued in respect of that year or the amounts paid during it and 2) corporate dividend withholding tax pursuant to Greenland tax law in force from time to time – and how this interacts with the on-account regime you describe (i.e., where tax is paid on account before the fiscal year-end to hold the 25% rate, does that payment fix the Conversion Amount to that year?).

Answer:

In our opinion the Royalty Conversion Amount, both the corporate income tax and the dividend tax shall be considered with respect to each financial year, regardless of the time of payment. I.e. on accrual basis.

Add 4) THE LOSS-PRESERVATION PERMIT (from answer 5(d)).

The pending acquisition will change the ultimate shareholders by more than one-third on completion. Please advise the application route, the granting authority, realistic timing, and whether the application can and should be filed before completion alongside the Section 69 approval process – and confirm that the target's accumulated Greenland exploration deductions and losses are preserved through the transaction structure if the permit is granted.

Answer:

It is possible to approach this in two ways. The first option is to apply for a preapproval for the tax preservation. Such preapproval will be granted on the basis of the conditions provided and requires the actual conditions are in line with the conditions used in the application.

The second option is to apply when the change has occurred.

Basically, the Tax Agency assesses whether the change is based on commercial terms or if the change is based on tax evasion reasons. If tax evasion reasons the tax preservation is not granted.

Such loss-preservation permit is applied for and granted with no regard to the application under section 69 of the Mining Act under which approval of direct or indirect transfer of the licence is required in case of a change of control-situation.

Best regards

Claus Bech
Partner, State Authorized Public Accountant