

SUPPORTING RECORD AND ANALYTICAL MEMORANDUM

Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation

Version 1.3

(Supplementary — EPA FOI Completion, Administrative Record Integration and Continuing Regulatory Record)

Document Control

Document Title

Supporting Record and Analytical Memorandum

Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation

Version History

- (a) Version 1.0 — dated 7 March 2026
- (b) Version 1.1 — dated 16 March 2026
- (c) Version 1.2 — dated 6 June 2026
- (d) Version 1.3 — dated 29 June 2026

Prepared by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

as Trustee of the **Owen Robert Inter Vivos Trust**

Version Control Note

1. Version 1.0, Version 1.1 and Version 1.2 remain unchanged and continue to form part of the Trustee's administrative and evidentiary record. Versions previously provided to relevant authorities remain unchanged.
2. Version 1.3 supplements, but does not amend, replace or retrospectively alter earlier versions of this Memorandum.
3. Version 1.3 is to be read together with earlier versions of this Memorandum and the associated Annexes for completeness of the Trustee's administrative and evidentiary record.
4. Version 1.3 is issued to record:
 - (a) completion of the Environment Protection Authority Victoria Freedom of Information disclosure process arising from FOI-010-2026;
 - (b) supplementary documentary analysis arising from that completed disclosure and recorded within Annex C Version 1.2;

- (c) integration of the supplementary cross-agency administrative record recorded within Annex D Version 1.1 and Annex E;
- (d) additional documentary and administrative developments occurring subsequent to Version 1.2; and
- (e) the continuing maturation of the Trustee's administrative and evidentiary record.

5. For the avoidance of doubt:

- (a) Version 1.0, Version 1.1 and Version 1.2 remain historical records of the documentary position existing at their respective execution dates;
- (b) Version 1.3 records subsequent documentary and administrative developments without retrospectively altering those earlier records; and
- (c) together, Versions 1.0, 1.1, 1.2 and 1.3 comprise the continuing administrative and evidentiary record maintained by the Trustee.

2.2.8 Environment Protection Authority Victoria Freedom of Information – Completion of Documentary Disclosure (Supplementary)

2.2.8.1

Subsequent to completion of Supporting Record and Analytical Memorandum Version 1.2, the statutory third-party review period associated with Environment Protection Authority Victoria Freedom of Information Request FOI-010-2026 concluded.

2.2.8.2

By correspondence dated 25 June 2026, the Environment Protection Authority Victoria advised the Trustee that:

- (a) the statutory period during which affected third parties could seek review had expired;
- (b) no application for review had been received; and
- (c) the remaining documents identified within the Notice of Decision could therefore be released.

2.2.8.3

The additional documents released included supplementary Environment Protection Authority administrative material, including Environmental Auditor verification reports, consultant technical reports, Desktop Assessment DTA-00029756 and associated supporting documentation.

2.2.8.4

The supplementary documentary analysis arising from completion of that disclosure process is recorded separately within Annex C Version 1.2.

2.2.8.5

This Memorandum records completion of the Environment Protection Authority documentary disclosure process only.

The detailed documentary chronology, administrative record and associated record-based observations are recorded separately within Annex C Version 1.2.

2.2.9 Cross-Agency Administrative Record (Supplementary)

2.2.9.1

Subsequent to completion of Supporting Record and Analytical Memorandum Version 1.2, the Trustee concluded the administrative clarification correspondence concerning amendment of Planning Permit PL-SP/05/0461-2 and the associated regulatory transition material.

2.2.9.2

The administrative correspondence comprised:

- (a) Notice dated 18 May 2026;
- (b) follow-up correspondence dated 26 May 2026; and
- (c) administrative correspondence dated 26 June 2026.

2.2.9.3

The correspondence sought administrative clarification concerning aspects of the disclosed regulatory transition record.

It did not seek:

- (a) amendment of the planning permit determination;
- (b) enforcement action;
- (c) review of the Department's decision; or
- (d) determination of legal rights.

2.2.9.4

Subsequent documentary and administrative developments also resulted in integration of the supplementary cross-agency administrative record concerning Council governance correspondence, Planning Permit administrative clarification and the continuing Department of Transport and Planning Freedom of Information and administrative chronology recorded separately within Annexes D Version 1.1 and E.

2.2.9.5

Accordingly:

- (a) Annex D Version 1.1 records the consolidated Council and Department of Transport and Planning administrative record, including document custody, Freedom of Information outcomes and subsequent administrative progression; and
- (b) Annex E records the completed Planning Permit administrative clarification chronology together with the relationship between that correspondence and the disclosed regulatory transition record.

2.2.9.6

This Memorandum records completion of those supplementary administrative records only.

The detailed documentary chronology, administrative interactions and record-based observations are recorded separately within Annex D Version 1.1 and Annex E.

Section 7 — Record Integration

This Memorandum is to be read together with:

- (a) Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- (b) Annex B Version 1.1 — SAC-01 Supplementary Record;
- (c) Annex C Version 1.2 — EPA Internal Review Correspondence and Regulatory Reliance Record;
- (d) Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record; and
- (e) Annex E — Planning Permit Amendment and Regulatory Transition Record.

Collectively, these documents comprise the Trustee's consolidated administrative and evidentiary record concerning the documentary material, administrative processes and regulatory chronology relating to the Lal Lal Wind Farm as at the execution date of this Memorandum.

This Memorandum records the principal chronology and administrative progression.

The Annexes record, in greater detail, the documentary material, Freedom of Information outcomes, administrative interactions, document custody and associated record-based observations relevant to the matters summarised within this Memorandum.

Accordingly, this Memorandum and the associated Annexes should be read together as complementary components of a single administrative and evidentiary record.

Section 8 — Record Status

(Retain Sections 8.1–8.3 unchanged from Version 1.2.)

8.4 Record Status at Version 1.3

As at the execution date of this Memorandum:

- (a) the Environment Protection Authority Victoria Freedom of Information disclosure process recorded within Annex C Version 1.2 had concluded;
- (b) the supplementary cross-agency administrative record recorded within Annex D Version 1.1 and Annex E had been integrated to reflect the documentary and procedural position existing at the execution date;
- (c) certain Department of Transport and Planning Freedom of Information processes remained undetermined as at the execution date, notwithstanding the expiry of the applicable statutory and agreed administrative timeframes, and are recorded within Annex D Version 1.1 as part of the administrative record existing at that date;
- (d) no amendment to the chronology previously recorded within Versions 1.0, 1.1 or 1.2 of this Memorandum has been identified as necessary; and
- (e) this Memorandum records the state of the disclosed administrative and regulatory record as at the execution date only.

8.5 Continuing Administrative Record

Subsequent documentary or administrative developments, should they occur, may be recorded within later supplementary versions of this Memorandum or the associated Annexes.

Such developments do not retrospectively alter the documentary or administrative record recorded by earlier versions but may be incorporated as supplementary material where necessary to preserve the continuing integrity, chronology and completeness of the Trustee's administrative and evidentiary record.

Document Status — Executed Record (Version 1.3)

This document constitutes the executed Version 1.3 of the Supporting Record and Analytical Memorandum (Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation) and is to be read together with all earlier versions of this Memorandum and the associated Annexes.

Version 1.3 is issued to record:

- (a) completion of the Environment Protection Authority Victoria Freedom of Information disclosure process arising from FOI-010-2026;
- (b) integration of the supplementary documentary analysis arising from that completed disclosure and recorded within Annex C Version 1.2;
- (c) integration of the supplementary cross-agency administrative record recorded within Annex D Version 1.1 and Annex E;
- (d) additional documentary and administrative developments occurring subsequent to Version 1.2; and
- (e) the continuing maturation of the Trustee's administrative and evidentiary record.

This document is to be read together with:

- (a) Supporting Record and Analytical Memorandum Version 1.0 (7 March 2026);
- (b) Supporting Record and Analytical Memorandum Version 1.1 (16 March 2026);
- (c) Supporting Record and Analytical Memorandum Version 1.2 (6 June 2026);
- (d) Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
- (e) Annex B Version 1.1 — SAC-01 Supplementary Record;
- (f) Annex C Version 1.2 — EPA Internal Review Correspondence and Regulatory Reliance Record;
- (g) Annex D Version 1.1 — Cross-Agency Custody, Administrative Progression and Reliance Record; and
- (h) Annex E — Planning Permit Amendment and Regulatory Transition Record.

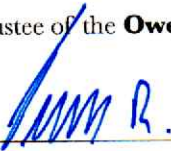
Together, these documents comprise the administrative and evidentiary record maintained by the Trustee as at the execution date of Version 1.3 and are to be read together as complementary components of a single continuing administrative and evidentiary record.

Execution

Executed by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

as Trustee of the **Owen Robert Inter Vivos Trust**

By:  R.

Name: Owen Lewis

Title: Director

Date: 29 / 06 / 2026