

ACG Metals Group Sustainability Policy

Adopted on 7 April 2026

The ACG Metals Sustainability Policy is a commitment to creating value for our shareholders while operating in a safe, environmentally responsible and sustainable manner, contributing to the wellbeing of our employees, their families and the communities where we operate, and respecting the human rights, culture, customs and values of those affected by our activities. This is achieved through four key focus areas: operate a safe and healthy workplace, respect employees and stakeholders, respect the environment and respect communities. We expect our contractors, suppliers and employees as appropriate to comply with this policy. We will review this policy annually.

ACG is committed to:

- Comply with our Code of Ethics, internal policies, and the laws and regulations in each region where we operate;
- Implement standards which consistent with applicable local and international legal requirements, industry good practice and commitments made to our stakeholders through policies, plans and procedures developed as part of our Environmental & Social Management Systems and associated Risk Management processes;
- Uphold fundamental human rights as defined in the United Nations Guiding Principles on Business and Human Rights and in the Voluntary Principles on Security and Human Rights;
- Manage the transport, storage, use and disposal of cyanide in line with the standards of practice set out in the International Cyanide Management Code;
- Design and operate our facilities with effective controls and technologies to mitigate identified risks to acceptable levels;
- Assess the potential short, medium and long-term impacts, risks and opportunities associated with our activities throughout the life cycle of our operations, including investment, acquisition or divestment decisions, on the basis of our sustainability values;
- Develop emergency and crisis management plans involving nearby communities;
- Build relationships with stakeholders based on trust through open and transparent communication;
- Promote leadership, personal commitment and accountability to this Policy from employees, contractors and suppliers;
- Ensure sufficient resources, including training, are allocated to implement and manage our commitments;
- Measure, verify and report our performance regularly; and
- Strive for continual improvement by setting objectives, measuring results against those objectives and recognising and rewarding performance.

Operate a SAFE AND HEALTHY WORKPLACE

ACG believes incidents are preventable. We aim to operate a safe and healthy workplace that is injury and fatality free. We believe that if we all work together, we can reduce the number of injuries in the workplace and enhance the well-being of employees, contractors and communities. To achieve this, we will:

- Identify, prevent, eliminate or mitigate risks to safety and occupational health;
- Manage risks using an appropriate management system;
- Use sound engineering principles in the design and operation of our facilities;
- Provide appropriate tools and personal protective equipment to carry out work safely and efficiently;
- Provide appropriate training for all employees to safely perform their duties;
- Maintain occupational health programmes;
- Maintain a high degree of emergency preparedness to effectively respond to emergencies;
- Promote overall health and wellness.

Respect EMPLOYEES

ACG will maintain inclusive, safe and healthy workplaces that foster collaboration and respect. To achieve this, we:

- Do not tolerate discriminatory conduct, unfair disciplinary practices, harassment, bullying or violence in the workplace;
- Employ and promote employees on the basis of merit;
- Recognise the value of diversity in the workplace;
- Treat employees and contractors fairly;
- Provide appropriate training and development opportunities;
- Provide fair and competitive compensation;
- Provide a fair employee grievance system;
- Recognise the right of employees to freedom of association;
- Enforce a drug and alcohol-free workplace;
- Consult, communicate and provide appropriate support to employees; and
- Maintain the confidentiality of collected personal and private information about employees.

Respect the ENVIRONMENT

ACG will mitigate the impact of our activities on the environment, and support its viability and diversity. To achieve this, we intend to:

- Manage risks associated with tailings, mine waste and water by employing Good International Industry Practice (GIIP);
- Identify, evaluate and respond to watershed related risks and opportunities to reduce cumulative impact on other users and surrounding ecosystems;

- Integrate biodiversity and ecosystem services conservation and land use planning considerations through all stages of our activities;
- Reduce the generation of waste and ensure its proper management;
- Implement measures to conserve natural resources including energy and water;
- Implement measures to reduce emissions to air, water and land, and to reduce our footprint, including with respect to deforestation;
- Implement measures to reduce our greenhouse gas emissions and improve our resilience to the effects of climate change on our operations;
- Apply the principles of circular economy through resource efficiency, reprocessing, reuse, recovery and recycling; and
- Integrate environmental and social considerations in developing responsible closure plans and rehabilitate sites to support long term physical and chemical stability.

Respect COMMUNITIES

ACG will contribute to the social and economic sustainability of communities associated with our operations. To achieve this, we intend to:

- Seek early, meaningful and transparent engagement with local stakeholders and rights holders, and continually review stakeholder identification processes;
- Ensure that risks to community health and safety from our operations are identified and mitigated;
- Identify vulnerable and disadvantaged groups in our communities and ensure that they are meaningfully included in engagement processes and benefit from development programmes, local sourcing and hiring as appropriate;
- Strive to obtain free, prior and informed consent by fostering an open, transparent and respectful dialogue with Indigenous Peoples and communities of interest;
- Not explore or seek to develop new mining operations in areas designated as a World Heritage Site;
- Identify and respect cultural heritage to preserve it from adverse impacts associated with our activities;
- Support local communities and their sustainability through development programmes, local sourcing of goods and services and employing local people;
- Ensure that no child labour nor any form of forced and compulsory labour are permitted in our workplaces, and work to identify and address this in our supply chains;
- Ensure security personnel are trained to respect human rights and avoid abusive or arbitrary use of force, conduct thorough background checks on security personnel and companies to prevent hiring individuals with a history of human rights violations and provide clear instructions to security personnel on appropriate conduct and prohibited actions.
- Not support, benefit or contribute to unlawful armed conflict, serious human rights abuses, or breaches of international humanitarian law;
- Avoid involuntary resettlement including economic displacement. Where this is unavoidable, we will proceed on the basis of meaningful consultation with affected stakeholders and rights holders and monitor the effectiveness of resettlement and livelihood replacement programmes;

- Support formalisation initiatives and improvements to the operational, safety, environmental and social practices of legitimate Artisanal and Small-Scale Mining operators, where they are present; and
- Provide confidential grievance mechanisms to report unethical, illegal or irresponsible behavior and address community concerns.