



Environment Policy

Approved by the Board of Directors on 25 June 2024

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 **EcoGraf**™

Statement

EcoGraf Limited is committed to effective environmental stewardship throughout the life of mine and all operations. This is critical to support the Company's licence to operate. All facets of the Company's activities, including graphite extraction, processing and purification facilities, as well as anode recycling, present risks to the environment, safety and human health and must be stringently managed.

The Company's commitments to effective environmental stewardship are outlined in this policy.

Scope

The Company expects its employees, officers, consultants and contractors to be aware of, observe, and act in alignment with this policy.

Commitments

- Minimise energy consumption and associated greenhouse gas emissions in accordance with the Paris Agreement's global goal of helping to maintain global temperatures to no more than 1.5 degrees Celsius above pre-industrial levels.
- Prioritise renewable sources of energy across operations.
- Once in operation, develop a climate adaptation and resilience plan.
- Minimise air emissions.
- Implement water management best practices to minimise impacts of water extraction, use and discharge.
- Effectively manage hazardous and non-hazardous waste and materials, including tailings, to mitigate or eliminate potential threats to human health, safety and the environment.
- Continually endeavour to improve the performance and yield of manufactured products to reduce materials wastage.
- Develop, implement and maintain a tailings management plan in accordance with the Global Industry Standard on Tailings Management.
- Minimise impacts on biodiversity and ecosystems, including IUCN Red List species and their critical habitats.
- Mitigate impacts on geology and soil composition to prevent adverse effects on the physical stability of land.
- Develop, implement and maintain an Environmental Management Plan.
- Develop environmental performance targets.
- Respect the cultural heritage of local communities in their traditional use of land and water resources.
- Collaborate with local communities and other relevant stakeholders to develop environmental initiatives.
- Develop, implement and maintain an emergency preparedness and response plan in collaboration with all relevant stakeholders.

- Develop and regularly review an integrated mine closure plan in collaboration with local communities.
- Ensure regular communication with local communities on environmental impacts, management plans and performance.
- In line with the Company's Risk Management Policy, conduct due diligence at regular intervals to identify, prevent, mitigate, measure and evaluate environmental impacts and risks, including energy and emissions, air quality, noise and vibration, water, waste, biodiversity and ecosystems and physical stability of land.
- Develop and implement a procurement policy that establishes the environmental standards required of vendors providing products and services.
- Establish a culturally appropriate operational grievance mechanism to address both complaints and grievances.
- Communicate this policy to all Company representatives, including directors, executives, employees and contractors, supply chain partners and joint venture collaborators.
- Support supply chain partners and joint venture collaborators to uphold the Company's environmental commitments.
- In line with the Company's Code of Conduct, comply with the laws and regulations of the countries in which the Company and its subsidiaries operate.

Definitions

Culturally Appropriate

Communication methods, formats, languages and timing that are aligned with the cultural norms, practices, and traditions of stakeholders.

Integrated Mine Closure Plan

Integrated mine closure is a dynamic process that is fully incorporated into mine planning and takes environmental, social and economic factors into account early in the mine development process.

Supporting Principles and Standards

- Equator Principles
- Global Industry Standard on Tailings Management
- International Finance Corporation's (IFC) Performance Standards on Social & Environmental Sustainability
- Initiative for Responsible Mining Assurance (IRMA) Standard
- Global Reporting Initiative (GRI) Standards

Supporting Policies

- Code of Conduct
- Sustainability Statement
- Human Rights Policy
- Communities Policy
- Health and Safety Policy
- Risk Management Policy

Review

This Policy will be reviewed annually.