



Communities Policy

Approved by the Board of Directors on 25 June 2024

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Statement

EcoGraf will respect its host communities situated in all jurisdictions where it conducts its operations. The Company's Epanko and Merelani-Arusha Graphite Projects have the potential to substantially impact the livelihoods of individuals residing near mine operations. While there may be numerous positive impacts, there are also significant risks that must be carefully managed to avoid the creation of adverse impacts on host communities.

The Company's commitments to respecting communities 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

- Implement, monitor and evaluate the effectiveness of a Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP), consistent with good international industry best practices (GIIP).
- Develop and maintain a community emergency preparedness and response plan in collaboration with all potentially affected stakeholders.
- Ensure regular communication with affected communities on progress and performance.
- Provide meaningful opportunities for employment, training and procurement for local enterprises.
- Create benefits for communities through community development projects.
- Allocate capital to community infrastructure.
- Support viable community initiatives.
- Conduct consultations that are culturally appropriate, equitable and inclusive by permitting the participation of individuals with varied experiences, perspectives and backgrounds and by actively engaging with vulnerable groups.
- Develop and regularly review an integrated mine closure plan and consult with local communities.
- In line with the Company's Risk Management Policy, conduct due diligence at regular intervals to identify, prevent, mitigate, measure and evaluate social and environmental impacts and risks to affected communities.
- Establish a culturally appropriate operational grievance mechanism for local communities to address both complaints and grievances.
- Communicate this policy to all Company representatives, including employees, officers, consultants and contractors.
- Support supply chain partners and joint venture collaborators to uphold the Company's commitments to local communities.
- 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

Affected Community

A community that is exposed to risks or impacts from a project and/or operation.

Culturally Appropriate

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

Good international industry best practice (GIIP)

The application of professional expertise, diligence, judgement and planning would be expected from experts working on a project of the same nature in a similar setting in a global or regional context.

Livelihood Restoration Plan (LRP)

A formal plan that addresses the economic displacement of affected communities.

Resettlement Action Plan (RAP)

A formal plan mutually accepted by the project's proponent and its affected communities, that specifies all resettlement arrangements to prevent, mitigate or compensate for losses and negative social consequences resulting from resettlement that may arise as an outcome of the resettlement process.

Supporting Principles and Standards

- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social, and Cultural Rights
- Equator Principles
- Global Reporting Initiative (GRI) Standards
- Guiding Principles on Business and Human Rights
- Initiative for Responsible Mining Assurance (IRMA) Standard
- International Finance Corporation's (IFC) Performance Standards on Social & Environmental Sustainability
- Universal Declaration of Human Rights

Supporting Policies

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

Review

This Policy will be reviewed annually.