

## LUMA AFRICA

### ENVIRONMENTAL POLICY

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Luma Africa (together with its subsidiaries, the “**Company**”) is committed to sustainable development and recognises that the long-term sustainability of our business is dependent upon responsible stewardship in both the protection of the environment and the efficient management of the exploration and extraction of mineral resources, and the sustainable use of resources for the benefit of all our stakeholders and thus it follows the policies of the Luma Holding – to where Luma Africa belongs. We seek to minimise our environmental footprint, mitigating any adverse impacts, and to promote sustainable development in the areas in which we operate.

Our values and business principles as a Company are based on a “zero harm” environmental management performance; they underpin our environmental policy and represent the minimum guidelines for the Company in this respect. Environmental issues are integrated into our decision making and business strategies. We will ensure that directors, officers, employees, contractors, and suppliers are aware of this policy as well as the relevant responsibilities which it sets out.

- We will comply with all applicable environmental laws, regulations and requirements.
- We are committed to complying with relevant industry standards relating to the management of environmental risks, including ISO14001 standards.
- We are committed to establishing and maintaining management systems to identify, monitor and control the environmental aspects of our activities, including the mitigation of environmental risk. Where appropriate, we may require employees to undertake training to ensure they are complying with best industry practices and all applicable environmental laws, regulations and requirements.
- We will ensure that resources are available to meet our reclamation, environmental and mine closure obligations, including progressive rehabilitation, and we will consult with our local communities and key stakeholders as part of our mine closure planning.
- We will ensure that our employees and contractors carry out their responsibilities in accordance with this Policy, applicable law, and the industry standards we are committed to meeting.
- We will work with local representatives in the communities in which we operate to educate the community on the environmental obligations associated with our activities.
- We will conduct regular internal and third-party audits to monitor, measure and evaluate the effectiveness of our environmental management systems, and will communicate findings to the Technical, Health & Safety Committee of the Board of Directors, and, where appropriate, to external stakeholders. We will strive to increase transparency in our annual public disclosure on environmental matters, particularly those relating to risk management systems in place and mitigation of environmental risk.

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- We are committed to transparent communication and consulting with interested and affected parties impacted by the environmental aspects of our activities. Where possible, we will adapt our practices to address concerns and further reduce the impact of our activities.
- We will work with local community representatives to educate our host communities on the nature of our impacts, how we manage them, our environmental obligations, and our performance.
- We will work to continually improve our environmental performance over time, including with regard to increasing our energy efficiency and reducing emissions and waste, and to promote sustainable development in the areas in which we operate.
- We will assess our biodiversity impacts and develop management plans with the goal of minimising deforestation and other biodiversity and land access impacts and ensuring no net loss of critical habitat.
- We will responsibly manage our hazardous and non-hazardous waste, including safe transport, storage, and handling, and will seek to reduce and recycle where possible.
- We will design, govern, and manage our tailings facilities in line with industry good practice.
- We recognise the increasing awareness within our industry of climate change and the need to participate in solutions that address the long-term impact of climate change, including where feasible, the reduction of green-house gas emissions and use of renewable energy sources.
- We recognise the sensitivity around water management and stewardship and will aim to ensure sustainable water use. Our goal is to continually improve water management systems and their efficiency. We monitor our usage of water resources in our areas of operation.
- We will develop emergency management and response plans in coordination with our stakeholders.

The Company has established a whistleblowing hotline to allow for the confidential reporting of environmental breaches and risks. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to use the following worldwide call collect/reverse charge number: +250783445300 ; or email [grievance@lumafrica.com](mailto:grievance@lumafrica.com). Anonymous submission boxes are also available at each mine site to facilitate the reporting of any environmental concerns or near misses. A copy of our Whistleblowing Policy is available on our web page at [www.lumafrica.com](http://www.lumafrica.com) or may be obtained from the Corporate Secretary.

The Board of Directors of the Company will review and evaluate this Policy on an annual basis to determine its efficacy.

This Policy will be posted on the Company's website and a copy of the policy will be posted at operational sites operated by the Company.

Last Approved:

20 May, 2022

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