

LUMA AFRICA SOCIAL RESPONSIBILITY POLICY

1. Introduction

Luma Africa (together with its subsidiaries, the “**Company**”) Social Responsibility principles seek to make a meaningful contribution towards improving people’s lives in the countries where we operate and are core to our social licence to operate.

Our purpose is to produce minerals that provides lasting value to society. To fulfil this purpose, our work has to be a trust-based partnership with our stakeholders and must help to create resilient and self-sustaining communities, where people are equipped with the skills, knowledge and expertise needed to prosper. The essence of our purpose is captured in the emphasis we place on promoting a responsible approach to mining aligned with the United Nations Sustainable Development Goals.

We recognise that the long-term sustainability of our business is dependent upon responsible stewardship of the environment, the efficient management of the exploration and extraction of mineral resources, and the sustainable use of resources for the benefit of all our stakeholders. Our stakeholders include our employees, contractors, suppliers, business partners, local communities and government authorities, including all individuals who live in proximity to our operations or who may be impacted by our business relationships. We will demonstrate respect for people, their customs and beliefs, and take responsibility for the impact that we have.

2. Principles

We will conduct our activities according to the following principles when managing our social and economic impacts and our stakeholder relationships.

- Assess the potential social and cultural, health and safety, and economic impacts on communities, and develop plans to avoid, minimise, mitigate, or remedy adverse impacts and to maximise positive impacts.
- Build trust-based relationships and prevent conflict by sharing information and addressing issues that are raised, through ongoing dialogue, in accordance with our stakeholder engagement plans and grievance mechanism
- Secure broad community support for any planned mining project and maintain that support throughout the life of mine.
- Consider stakeholder input when developing operational designs and plans and when making decisions that may impact them.
- Work with local stakeholders through partnerships to understand community needs and priorities, develop objectives and plans, strengthen institutions, and implement projects that result in positive socio-economic change.
- Work with stakeholders to establish and track socio-economic indicators, to enable engagement and improve decision making around impact management and community wellness.

This is a controlled document; Un-authorized Changes & reproduction is strictly prohibited

- Build local employment and business capacity and support access to opportunities with our operations.
- Supports the development of economic growth poles around our mines.
- Where economic or physical displacement cannot be avoided, adhere to IFC Performance Standard 5, including formally consultation throughout the process and seeking to leave households and communities better off.
- Engage with artisanal and small-scale mining stakeholders and collaborate with government to prevent conflict, reduce negative impacts, support alternative livelihoods, and facilitate formalisation where feasible.
- Avoid or minimise impacts on cultural heritage through assessments and the implementation of our Chance Finds procedures.
- Avoid affiliation with organisations or activities that actively promote religious or political beliefs.
- Ensure that directors, officers, employees, contractors, and suppliers are aware of this policy as well as the relevant responsibilities which it sets out.

3. Implementation

The Board is accountable for ensuring this policy is effectively implemented and has delegated oversight to senior management. The management of the Company will report to the Board regarding the efficacy of steps taken to achieve compliance with the principles set out in this Policy and, should they occur, any material instances or trends of violations of this Policy.

4. Reporting Violations

The Company has established a whistleblowing hotline to allow for the confidential reporting of activities that may violate any of its Policies. 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. Anonymous submission boxes are also available at each operations site.

A copy of the Company's Whistle-blower Policy is available on its web page at or may be obtained from the Corporate Secretary.

5. Review and Amendment of Policy

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 mine sites operated by the Company.

Last Updated: 20 May 2022

This is a controlled document; Un-authorized Changes & reproduction is strictly prohibited