



An ERG Initiative

METALKOL CLEAN COBALT & COPPER

Performance Report 2025

Reporting period: 01.05.2024 – 31.07.2025 ¹

1. This Performance Report updates on the statements made in the Clean Cobalt & Copper Framework, the most recent version of which was published in September 2022 ([link](#)) and incorporates additional information to support implementation of the Copper Mark assurance framework

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Introduction

In 2020, Metalkol SA (Metalkol), part of Eurasian Resources Group Sarl (ERG or Group), in the Lualaba Province of the Democratic Republic of Congo (DRC), commenced the commercial reprocessing of historical cobalt and copper tailings previously deposited by other operators in the Kingamyambo Tailings Dam and Musonoi River Valley.

Our goal is continuous improvement and to drive positive outcomes by pursuing the seven Clean Cobalt & Copper Framework Goals. At the core, we apply the five steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG). However, we go beyond this guidance to include operational management systems and risks, as opposed to only those relevant to our supply chain. We also expanded our scope beyond the Annex II risks of the OECD DDG to cover all human rights and opportunity enhancements with respect to the environment, social development, health and safety and value chain leadership. (Figure 1). In 2022, we included our commitment to conformance with the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) and achieved compliance with the Cobalt Refiners Standard and the RMI Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc, reconfirmed in 2023 and 2024.

Figure 1: Seven goals of the Clean Cobalt & Copper Framework



In December 2018, the ERG Clean Cobalt Framework and goals for responsible production of cobalt in the DRC was released. In August 2019, Metalkol provided its first performance report against the Clean Cobalt Framework as it related to the management system and processes of the cobalt reclamation process at Metalkol, assured by independent auditors through their limited assurance opinion on the Performance Report. The first performance report and assurance opinion is available [here](#). In October 2021, the expanded Clean Cobalt & Copper Framework was published and between 2022-24, the annual independent auditors' limited assurance reports on the Metalkol Clean Cobalt & Copper Performance Report were provided here: <https://www.ergafrica.com/cobalt-and-copper-initiative/>.

In February 2023 and September 2024, the RMI re-confirmed that Metalkol was conformant with the Assessment Standard for Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (2021) and Cobalt (2018), after third party audits by RMI assurance providers. There were no substantial non-compliance findings and therefore no corrective action plan required. Confirmation of conformance can be found [here](#). The 2025 assurance was in process at the time of this update.

We now provide a fifth Clean Cobalt & Copper Performance Report. This progress report should be read in conjunction with the [ERG Clean Cobalt & Copper Framework](#).

In 2024, Metalkol further enhanced its approach to responsible production by committing to the Copper Mark assurance framework: https://CopperMark.org/wp-content/uploads/2024/09/Copper_Mark_AP_LetterofCommitment_Metalkol_2024.09.12_POST.pdf. As such, this 2025 Performance Report has been expanded to incorporate additional Copper Mark criteria and metrics. At the time of publication, Metalkol is in the process of Copper Mark independent third-party assurance, after which the report and assurance opinion will be available publicly.

Performance Report

In the following sections, we describe our supply chain due diligence and our operational risk management systems during the assessment period, including risk assessment and mitigation, reporting initiatives, as well as opportunity enhancement. Our performance reports are a key tool to disclose our approach and performance across areas of due diligence and sustainability performance. Where applicable, we include corrective actions identified during both second-party and third-party audits and our progress in the reporting period.

All compliance statements refer to the period 1 May 2024 to 31 July 2025.

Goal 1 Compliance with the OECD Due Diligence Guidance

Compliance statement

Metalkol has established and implemented management systems and procedures to align with the Clean Cobalt & Copper Framework, RMI RMAP, the Copper Mark assurance process and at a minimum, conform with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas (OECD Due Diligence Guidance).

Systems for managing operational risks

1.a We have established strong company management systems

The Clean Cobalt & Copper Framework, Code of Conduct and Supplier Code of Conduct describes our commitment and approach for achieving sustainability, conducting our business responsibly and respecting human rights in our operations and supply chain.

Compliance with the OECD Due Diligence Guidance is a goal in the Clean Cobalt & Copper Framework, and as such has been translated into our management systems and policies, in particular the Metalkol Human Rights Statement of Commitment, which has been reviewed and reissued in the reporting period. The Clean Cobalt & Copper Framework and the Metalkol Human Rights Statement of Commitment summarise our salient risks (set out below) and set out the governance structure for our human rights due diligence practices. The Metalkol Human Rights Statement of Commitment ensures our alignment with ERG's Group level Human Rights Policy, which has been approved by the ERG Board. It lays out our commitment to respecting human rights and describes our approach for achieving this. It applies to all our operations, suppliers and employees. All of these documents are available on the [ERG website](#).

ERG's commitments towards integrity are embodied in the ERG Code of Conduct, which sets out our standards and policies on key legal, moral and ethical matters, and is binding on the Board of Managers, ERG employees, officers and directors, and ERG's counterparties worldwide. The Code is further expanded by Group Compliance policies. ERG also communicates standards through its Supplier Code of Conduct.

ERG maintains internal control systems to ensure compliance with laws, regulations and Company policies to protect and prevent misuse of Company assets and ensures appropriate authorisation for Company transactions and other corporate activities. Relevant Group management systems that govern our broader interactions with society include, but are not limited to, policies covering anti-bribery and corruption, agents compliance, anti-money laundering, human rights, ethics and compliance (including labour conventions) anti-trust and competition compliance, CSR projects and sponsorship, international economic sanctions compliance, personal data protection and preventing the undermining of legitimate economic, social, legal, political and business interests. These Codes and policies have been adopted and are implemented by Metalkol.

The Head of Compliance International is responsible for implementation in the International Perimeter, including Africa and the Metalkol site.

ERG has in place a CAHRA procedure, which applies to the wider ERG Group. A CAHRA assessment has been applied to Metalkol, including the DRC and countries through which it transports product. The DRC and others of these countries are considered to be high risk and as such the principles set out in the CAHRA procedure have been applied to Metalkol in relation to the additional diligence procedures described in the OECD Guidance.

Comprehensive training and awareness programmes are conducted with employees, partners and suppliers on these policies and our ethical commitments, governance and compliance measures. In 2024, 3,994 Metalkol employees and contractors received training. Metalkol was not being subject to any material judicial findings, or regulatory sanctions (including those linked to our social, economic and / or labour impacts). Nor was Metalkol subject to any investigations, legal actions or findings in relation to bribery/corruption, money laundering or applicable sanctions.

Metalkol has also established and implemented management systems and procedures to manage relevant ESG issues including health, safety, environment, communities, security, human rights and human resources. ERG Group level policies and the Code of Conduct articulate the ESG requirements, alongside ERG Africa regional Safety, Health, Environment and Community (SHEC) policies, which have been applied at Metalkol based on the site's risk mitigation needs and ESG requirements. The site has also developed entity level policies, for example, its own SHEC policy and the Metalkol Statement of Commitment to Human Rights, and published site-specific goals, performance against which is reviewed through the Clean Cobalt & Copper Framework annual performance reports. All Metalkol procedures are regularly reviewed and revised as required. Policies and commitments are being rolled out to staff and contractors through inductions, awareness raising campaigns and training. The management system for Occupational Health and Safety is informed by ISO 45001:2018 and for Environmental Management is informed by ISO 14001:2015; both are currently in the process of certification.

An Environmental and Social Impact Assessment (ESIA) was conducted and approved by the DRC government in 2018. A gap analysis audit was performed in 2017 against IFC Performance Standards. The ESIA forms the basis of the environmental and social site management plans for the identified environmental and social impacts and is updated as operational changes occur, or at least every 5 years. The most recent ESIA was approved in 2022 and is valid until 2027 if no major operational changes occur. Obligations from the ESIA are documented on a web-based platform and all ESG-related grievances/incidents (incl. Health & Safety and Human Rights) are recorded within Isometrix.

As the management systems are implemented through site level procedures, and with a new commitment to Copper Mark, the development of additional sustainability KPIs commenced during the reporting period.

The ESG-Human Rights Working Group (previously the Human Rights Working Group, HRWG), chaired by the Metalkol Chief Operating Officer (MCOO), is responsible for overseeing the implementation of the Clean Cobalt and Copper Framework, Human Rights Statement of Commitment and Copper Mark commitments, and consists of representatives of all key functional areas. In order to ensure oversight of broader ESG risks and Copper Mark criteria the scope of this Working Group has been expanded to include ESG issues and has been renamed as the ESG-HR Working Group in the reporting period.

The ERG Africa Sustainability Committee, which is chaired by the Regional CEO, provides regional governance and oversight of ESG risks and performance against plans and includes regional and group functional representatives.

We have rolled out these ESG policies and commitments to staff and contractors through awareness campaigns including posters in high traffic areas and email notifications to staff. Our target is to reach all employees and contract employees working on site on an annual basis.

Policies and procedures are reviewed on a periodic basis and updated as required in light of any operational, legal or other changes or improvements identified. National and international laws are integrated as part of policy development and reviewed as advised by ERG's legal function which is composed of qualified lawyers and practitioners from relevant jurisdictions. International and material national developments are reported to the Compliance Committee of the ERG Board of Managers.

1.b We identify and assess our risks and impacts

At Metalkol, the Chief Operating Officer is responsible for overall governance and risk management including those related to ESG issues and human rights. This process forms part of an overarching enterprise risk management system consistent with the ERG enterprise risk management process which is designed to identify and understand potential risks to the business and its stakeholders, as well as related opportunities. This includes our most material sustainability and ESG issues, which have the potential to impact our people, local communities and the environment, as well as our ability to achieve our operational and strategic objectives. The Group risk management policies are informed by the International Standard for Risk Management (ISO 31000), and recommended ISO 31010 techniques are applied when assessing risks. Based on the Group risk management system and the regional Risk Management System Procedure, ERG Africa prepares regular risk reports for regional and Group-level management. These are also detailed further in the annual [ERG Sustainable Development Reports](#) and the upcoming ERG Africa Integrated Annual Report 2024. Where risks of potential and/or actual adverse impacts are identified they are set out in a risk register with corresponding strategy to respond to such risks, and which are then monitored. Each risk is assigned to a risk owner.

Metalkol has established an ESG-HR Risk Register (formerly the Human Rights Risk Register) that allows us to identify and assess the human rights and relevant ESG risks and impacts of our operations. Each identified risk is assessed based on its likelihood and impact. The saliency of risks is determined by the scale/seriousness of impact, scope, irremediability and probability, except for the Human Rights related risks which are prioritized by the potential impact rather than its probability. For each risk, an action plan and risk owner is assigned and overseen by the ESG-HR Working Group chaired by the MCOO. This approach is aligned with the UN Guiding Principles on Business and Human Rights. In 2025, we have revised our ESG-related Key Performance Indicators (KPIs) to ensure appropriate monitoring and tracking of our progress.

Our risk identification and assessment process also integrates outcomes of our stakeholder engagement initiatives including grievances. We have established internal and external grievance and whistleblowing mechanisms, and regular stakeholder engagement dialogues, to enable continuous identification of risks and provide various channels for issues to be raised by employees, contractors and communities. Grievances can be voiced through letters, complaint forms, community meetings, union representatives, community boards, our website and a separate dedicated email inbox managed by Metalkol, as well as the ERG Hotline (including email, web-intake and phone), which is 100% confidential and is managed 24 hours a day, seven days a week by an independent company. Grievances are managed according to our Grievance Management Procedure and recorded in our grievance registry. We also incorporate risks raised by other means, including Non-Governmental Organisations (NGOs)/civil society organisations. We also receive regular visits/inspections by applicable regulators.

Risks are reported at a Group level in the annual Sustainable Development Reports, regionally in the upcoming ERG Africa Integrated Annual Report 2024, and at a site level through the Clean Cobalt and Copper Framework Performance Reports.

Based on the regional double materiality assessment which provides a comprehensive framework for ESG risk management, and the evolving context at site, the salient risks for the reporting period, and for which relevant management and mitigation measures are provided throughout this document, were as follows:

- **Security** – Metalkol deploys private and public security to mitigate criminal activity and potential disputes / conflicts as a result of illegal mining activities. We are determined to provide for the security, health and safety of all those employed by us or working on our site. This commitment extends to ensuring that our security arrangements do not in themselves endanger those living nearby or otherwise threaten the strong relations we are building with neighbouring communities or involve any arrangements with non-state armed forces in accordance with the Voluntary Principles on Security and Human Rights (VPSHR).
- **Artisanal and Small-scale Mining (ASM)**– Metalkol operates in a region where Artisanal and Small-scale Mining (ASM) is often the only or best source of income for many people. For those engaged in ASM, it can also be a dangerous form of livelihood and one with potentially negative impacts on the environment and society overall as children are often involved. Beyond our zero tolerance of child and/or forced labour in our operations and/or through our supply chain, and based on our commitment to being recognized as a responsible source of copper and cobalt, Metalkol continues to engage with local ASM cooperatives and human rights defenders in relation to ESG matters, including safety.
- **Fair Employment Practices** – ERG strives to treat employees fairly and impartially in all aspects of employment and to comply with applicable employment laws in all the countries in which it operates. This means observing those laws that pertain to freedom of association, privacy, recognition of the right to engage in collective bargaining, the prohibition of forced, compulsory and child labour and prohibition of any illegal employment discrimination or harassment. Metalkol ensures that it has in place labour practices that comply with relevant laws and ILO conventions and enshrines these principles in its policies. We support our employees in membership of unions and engage proactively with unions. We have a collective agreement in place which goes beyond national labour laws and have set Diversity, Equity & Inclusion targets during the reporting period.
- **Health and Safety** – Health and Safety is a top priority at Metalkol, and a comprehensive Health and Safety management system has been implemented for risks and impacts for employees, suppliers and surrounding communities. All employees and contractors must undertake health and safety training and wear task appropriate PPE. The management system is aligned with ISO 45001 and Metalkol is working towards certification in 2025.
- **Business relationships** – Metalkol recognises its responsibilities extend to the whole of its operation. In this regard, we are committed to ensuring that our contractors and suppliers also respect the rights of workers and communities. During the reporting period, we have also embedded environmental requirements to the extent possible, in new or renewed contracts with business partners, and included provision for periodic compliance checks against these requirements. We continue to expand and adapt our ongoing mitigation measures in relation to these risks accordingly.

- Community impacts** – Metalkol acknowledges the expectations that neighbouring communities have in respect of our potential to support jobs, sustainable livelihoods and wider community development. As part of our comprehensive strategy on social investment, we look to increasingly recruit staff and source products locally in adjacent communities, and in the wider Kolwezi area as far as possible, as well as work in close partnership with communities, regional government and local and international human rights and environment defenders to support sustainable development amongst those communities most affected by our operation. We endeavor to avoid any community resettlements and our current Life of Mine does not involve any further resettlements (the Samukonga voluntary resettlement having been completed as set out below). Where we conduct crop compensation, we follow Government guidelines and our internal procedures with oversight from AGRIPEL (agricultural governmental department). We provide medical benefits to employees and their dependents and support health initiatives within the wider community. [Further information can be found within our Sustainability Development Reports.](#)
- Environmental impacts** – Preserving the environment is an intrinsic consideration at Metalkol given its mining reprocessing model. Metalkol supports the protection of the environment and the importance of identifying and managing the potential environmental impacts of its activities. We are committed to environmental stewardship and have in place an environmental management system which is based on a multi-stakeholder approved ESIA and have set performance indicators to ensure sustainable environmental practices including but not limited to biodiversity, water stewardship, tailings management and pollution. Our environmental management system is aligned with ISO 14001, and we are working towards certification in 2025.
- Supply Chain and Transportation** – Metalkol is conscious of the risks to both people and the environment of transporting our people, goods and sometimes hazardous materials across long distances, especially in a region where the existing infrastructure is often in poor condition. Metalkol has in place a comprehensive management plan and emergency response procedure to minimise the likelihood and severity of the risks. This system also applies to Metalkol's transport and warehousing contractors.

Additional regional-level risks exist and are addressed on a regional basis including legal, government relations and business integrity and remaining OECD DDG Annex II risks such as anti-money laundering, payment of taxes, fees and royalties to governments.

The risk profile in relation to potential impacts has fluctuated during the assessment period and is assessed on a regular basis by the ESG-HR Working Group. No new risks were identified in the reporting period.

In the context of expanding the scope of the human rights risk assessment, the risks identified within the latest approved Environmental and Social Impact Assessment (ESIA) have been added within the ESG-HR Risk Register to ensure appropriate preventive, mitigation and remedy measures when required.

Identification and assessment of risks, specifically related to sourcing and transportation of our product and chain of custody are done in accordance with the Chain of Custody Procedures and Copper and Cobalt production standard operating procedures.

The key elements of our risk-based Group Compliance management system include risk identification and management, counterparty due diligence, training, monitoring and reporting. Our senior managers are kept informed of key risk areas during quarterly reviews and the most material ones are publicly reported within our annual Sustainable Development Reports.

1.c We manage our risks and impacts

For each identified and assessed human rights and ESG risk, Metalkol has developed a mitigation plan with corresponding responsibilities, timelines and milestones. The mitigation plans are developed, overseen and implemented by the relevant functional department(s). The relevant departments report their progress at the ESG-HR Working Group meetings, which tracks the implementation of the mitigation plans. This includes the environmental and social impacts identified in the ESIA.

Obligations from the ESIA are documented on a web-based platform and all ESG-related grievances/incidents (including Health & Safety and Human Rights) are recorded within Isometrix.

Metalkol's production processes – encompassing copper solvent extraction, copper tank-house operations and packaging, as well as its cobalt hydroxide purification, precipitation, drying, and packaging – have been awarded an ISO 9001:2015 certification.

Management systems are aligned with ISO 14001 and ISO 45001 international standards for environmental management systems and health and safety management systems and certification is in progress.

As part of the Metalkol SHS Management System, an Emergency Management procedure is in place to ensure that legal requirements and responsibilities are defined. Metalkol has in place a structured set of plans to deal with potential emergencies to provide planned coordinated and organized leadership to minimise the potential loss of life, injury, damage to property, damage to environment, harm to community or disruption of business; and facilities, equipment and systems are in place to manage emergency situations.

The management system requires systematically identifying and documenting possible scenarios of emergencies every 2 years and whenever there are significant changes to the work site, and to allocate the resources required for emergency response (financial, human capital, equipment, medical facilities, etc.). This includes adequate emergency planning and call out including a Crisis Management Team (CMT), an Emergency Management/Response Team (EMT/ERT) and an Emergency Control Center (ECC) for control and operation during an emergency.

During the reporting period, Metalkol has prepared and distributed a controlled current copy of the Emergency Response Plan to appropriate internal stakeholders and maintains a current copy at key locations. Each plan details the requirements for operational and area-based emergency situations. Recovery, clean up and remediation procedures have been included in the Emergency Response Plan, in particular for materials that pose a significant risk to the health and safety of employees, environment or the community.

Local authorities have been engaged in monitoring the Emergency Response Plans through the bi-monthly Health & Safety Committee and a copy has been submitted to Congolese Environmental Agency (ACE).

Emergency Response Plans and risks at the operation or facility will be communicated to the local community where appropriate as part of the site stakeholder engagement plan. Through the EMT, campaigns to raise community awareness through training in French & Swahili will be provided and community assembly points will be designated.

1.d We support customer audits and independently assure our reporting

Metalkol allows customers to conduct due diligence and audits on its operations through a provision included in customer contracts. We support these exercises by completing customer questionnaires and allowing customer and auditor access to our sites, documentation and by facilitating contact with our staff and stakeholders. As an example, a multi-customer second-party audit was previously conducted of OECD Due Diligence Guidance, Cobalt Refiner Standard and IRMA critical requirements, and multiple customer questionnaires completed.

Independent ISAE 3000 limited assurance was provided on Goals 1-6 for reports in 2019, 2022, 2023 and 2024. In this reporting period, and going forward, independent ISAE 3000 reasonable assurance will be provided against the internationally recognized Copper Mark assurance standard.

In addition, multiple regulatory audits have been performed during the reporting period by the DRC authorities to ensure Metalkol's legal compliance with DRC laws.

Metalkol maintains a Regulatory Matrix which is reviewed bi-monthly by the cross-functional ESG-HR working group and assesses the status of compliance for each of the identified obligations. To stay abreast of the latest legal and regulatory developments in the DRC, Metalkol monitors applicable laws and updates its Regulatory Matrix by accessing the DRC legal gazette (Journal Officiel), as well as an online database (Lacier). The Metalkol legal team monitors monthly legal implications of the site's activities and include regulatory requirements in the workflows. Whenever required, the site legal team is also accountable for following up with each relevant department to ensure compliance with legal obligations.

Quarterly reports on the site's status of legal compliance are provided through the ERG Africa Sustainability Committee and bi-monthly reviews are conducted by the ESG-HRWG to assess the most appropriate risk mitigation measure when required. In addition, internal and external whistleblower (ERG Hotline) and grievance mechanisms are available through which legal issues can be reported.

Metalkol is a member of the FEC (Fédération des Entreprises du Congo), which has a legal watch committee where legal concerns are being discussed for joint advocacy efforts when required.

1.e We publicly report on our progress in fulfilling the Clean Cobalt & Copper Commitments

An ERG Sustainable Development Report (SDR) is prepared and published annually with reference to the Global Reporting Initiative (GRI) Standards and is focused on the Group's most material sustainable development issues. Reports are available on the ERG website. In 2025, the Group has finalized its third party CSRD gap assessment and is currently working towards compliance and its first-year report. ERG conducts a double materiality assessment process to identify and prioritise issues. For ERG Africa, a third-party materiality survey for the region was completed in 2025. Metalkol reports data to the Group level which is consolidated into the annual Sustainable Development Report.

In the DRC, and in addition to the legally required entity disclosure [<https://www.ergafrica.com/publications/>], we report publicly on our ESG progress through our upcoming ERG Africa Integrated Annual Report 2024 on each of our entities including Metalkol. This includes business information, financial statements, health, safety, environmental and social performance.

Metalkol also complies with DRC reporting obligations including environmental reports, community development project reports, ESIA, labour reports, H&S reports and EITI. Through stakeholder engagement, Metalkol also shares information with communities, NGOs and other relevant stakeholders.

This Performance Report is Metalkol's update for the period 1 May 2024 to 31 July 2025 to demonstrate that management systems and procedures have been designed to enable Metalkol to be in compliance with the Clean Cobalt & Copper Framework and disclose progress against any corrective actions. The report is issued as a stand-alone report and is publicly available through our website. This will be progressively replaced by the Copper Mark process and upcoming ERG Africa Integrated Annual Report 2024.

The Clean Cobalt & Copper Framework, ERG Code of Conduct, ERG Supplier Code of Conduct, ERG Human Rights Policy and Metalkol Statement of Commitment and sample contractual terms are also publicly available.

We also publish on our website RMI RMAP conformance certificates, the ISAE 3000 limited assurance reports and will publish the outcomes of the Copper Mark assurance process once available.

1.f We support community participation

In addition to the OECD 5 Steps, the Responsible Mineral Assessment Process (RMAP) includes a Step 6 – Community Participation. Our Community and Responsible Mineral Development team leads community engagement and participation through stakeholder mapping and engagement planning, ESIA and commitment register consultation processes, community development initiatives and multi-stakeholder partnerships, local economic development and a community grievance mechanism.

We have established internal and external grievance and whistleblowing mechanisms to enable continuous identification of risks and provide various channels where grievances can be voiced by employees, contractors, suppliers and community stakeholders. At the site level, grievances can be voiced through letters, complaint forms, community meetings, union representatives, community boards, our website and a separate dedicated email inbox managed by Metalkol, as well as the ERG Hotline (including email, web-intake and phone), which is 100% confidential and is operated 24 hours a day, seven days a week by an independent company.

Grievances are managed according to Metalkol's Grievance Management Procedure which is aligned with the International Finance Corporation (IFC) Performance Standards and the UN Guiding Principles on Business and Human Rights. We use the IsoMetrix software to help record, centralise and analyse grievance data, facilitate more effective mitigating actions and manage related grievances, investigations and remediation. We also incorporate risks raised by other means, including Non-Governmental Organizations (NGOs) or civil society organizations. Metalkol receives regular visits by applicable regulators and our Community Liaison Officers perform regular visits within our hosting communities to collect feedback and recommendations.

Information on Metalkol related grievances is reported within this Clean Copper and Cobalt Performance Report and aggregated in the ERG Sustainable Development Report and the upcoming ERG Africa Integrated Annual Report 2024. Within this reporting period, Metalkol received 16 grievances through the site-based grievance mechanism (14 in previous period) which are all resolved and closed. In 2025, an external review of the grievance mechanism will be conducted by DCAF and Justicia.

Metalkol also implements a Social Management System including procedures and plans for stakeholder mapping and engagement which are aligned with IFC Performance Standard 1 and the UNGPs. The stakeholder engagement procedure and plan structure our engagement with local communities and provide the basis for Metalkol's community relations approach and priorities. The plan defines the purpose, scope, requirements and roles and responsibilities for our engagement with key stakeholders. Through the procedure, Metalkol has mapped relevant stakeholders, which includes nine communities of interest with a population of approximately 100,000-150,000. Engagement with these communities is structured in a community engagement calendar and includes a wide range of topics including health and safety, employment, procurement, land use, the environment and community development.

Metalkol's stakeholder engagement is also at the core of its approach to community investment, resettlement management and ASM engagement. In 2017, Metalkol conducted nine participatory rural appraisals covering populations affected by the project. The priority areas identified by the communities included access to clean water, access to education and livelihoods; and these priorities informed Metalkol's approach to community development and investment. In 2018, the revised DRC Mining Code introduced an obligation for mining companies to develop a Commitments Register (Cahier des Charges) and contribute 0.3% of turnover to a community development fund managed by a multi-stakeholder committee. During the development of the Metalkol register, the priorities identified during the participatory rural appraisals were reinforced through extensive community consultations. The first Metalkol Commitments Register was signed in November 2020, and the second Cahier des Charges was signed in April 2025 with a validity of 5-year as per DRC Mining Code requirements.

Metalkol engages and partners with civil society organisations and NGOs to discuss concerns and promote sustainable development. All our engagements result in written minutes, and are explained to affected stakeholders in a format and language readily understandable to the local population and workforce. Engagement records are kept in Isometrix. An overview of our engagement and specific responses to reports published by stakeholders are made public on our website, in the ERG Sustainable Development Report, upcoming ERG Africa Integrated Annual Report 2024 and Metalkol's Clean Cobalt and Copper performance reports.

Summary of management systems and controls

- Policy framework including Human Rights Policy, Metalkol Statement of Commitment to Human Rights, Code of Conduct and Supplier Code of Conduct
- ERG Clean Cobalt & Copper Framework
- Risk management policy and procedure with ongoing oversight by Metalkol ESG-HR Working Group and review of mitigation measures
- Staff and contractor training and awareness raising campaigns
- ESIA and related environment, social, health and safety management plans and procedures
- Safety, Health and Sustainability (SHS) data management system (Isometrix)
- Internal reviews, second-party and third-party audits
- Public reporting through the third-party assured Clean Cobalt & Copper Performance Report, ERG Africa Integrated Annual Report 2024 and ERG Sustainable Development Report

- Commitment to RMI Cobalt and Joint Due Diligence Refiners Standards and the Copper Mark assurance process
- Implementation of formal CAHRA procedure
- Implementation of automated Human Resources systems using HR SAP and enhanced SharePoint systems
- Regular stakeholder engagement and communication and review of grievance mechanism process

Systems for managing supplier risk

As a primary extraction source of cobalt and copper, Metalkol does not source or purchase any copper or cobalt from others. As such, our supply chain due diligence and ERG Supplier Code of Conduct refers to procurement of products required for the Metalkol operation and the chain of custody of our product for customers. In light of the CAHRA risk assessment in relation to DRC, and other countries through which we transport product, the systems for managing supplier risk are designed to monitor red flags and we apply enhanced due diligence accordingly.

Metalkol has adopted and implemented the Supplier Code of Conduct, which guides our approach to conducting business with suppliers and contractors. Our suppliers and contractors are contractually obliged to adhere to the ERG Code of Conduct, Supplier Code of Conduct, the ERG Human Rights policy and other key compliance policies such as anti-bribery and corruption, anti-money laundering, agents' compliance, competition compliance and international economic sanctions. The Supplier Code of Conduct communicates our expectations regarding the management of risks related to health and safety, the environment, integrity, fair employment, human rights, confidentiality and data protection, and is distributed as part of our supplier package.

Adherence is monitored by sending an extended questionnaire to all business partners every two years and by checking on any allegations of violations. Where non-compliance is found, we will review the circumstances with the supplier and work with them to address and remediate risk. If risks cannot be remediated, we will terminate the business relationship. Selected suppliers have been trained in the Supplier Code of Conduct in conjunction with supplier audits. We have rolled out an e-learning training course on the Supplier Code of Conduct.

For new business relationships, Metalkol applies a risk assessment on two levels: risk assessment of the nature of the product or service and Counterparty Due Diligence (CPDD) of the contractor or supplier itself with the aim of identifying risks relating to (among other things) sanctions, money laundering, CAHRAs and human rights, bribery and corruption. The CPDD also includes questions on environment, health, safety and human rights. This process results in a risk score which informs decisions and any mitigation measures. In 2023, the CPDD process was validated by an external expert and in 2024 a revised CPDD Framework was implemented, with its operation enhanced through the introduction of improved supporting IT tools.

In 2023, ERG Africa revised its Procurement Policy to facilitate alignment across the ERG Africa procurement management systems with an emphasis on creating functional ownership of the procurement process. The new Procurement Management System requires the sourcing teams onsite and contractors to align and report progress on KPIs related to sustainability during the onboarding process and based on the most significant identified impacts and risks. At the tender stage, the sourcing process includes a cross-functional team to guide the identification of the main sustainability-related mitigation measures required for each contractors/ commodities category. Mainly, these measures include considerations towards ethical business, human rights, health and safety, decarbonization, water and air quality management, biodiversity and environmental hazards guided by the approved Site ESIA.

Supplier audits of high-risk suppliers ensure proactive compliance with business processes and general corporate governance, including sustainability considerations. Suppliers/ Contractors are trained on relevant risks and/or identified gaps and requested to implement mitigation measures plans as needed, including sustainability-related ones. These form part of our right to audit our suppliers and contractors which is included within our contracts.

For Metalkol produced material, Chain of Custody procedures are implemented and assured through the RMI RMAP assurance process.

Records are processed and retained in accordance with ERG's Data Protection Policy and applicable statutory retention periods.

This Metalkol Performance Report (Step 5 report) provides an overview of identified and ongoing salient operational and supply chain risks. For supply chain due diligence risks, our approach to managing and mitigating risks on an on-going basis is described in this section.

Our supply chain due diligence risk assessments did not identify any specific Annex II risks in the reporting period.

Summary of management systems and controls

- Supplier Code of Conduct, Human Rights Policy, Procurement Policy and associated compliance policies
- Supplier monitoring, training and audits
- New supplier risk assessment and updated CPDD procedure
- Commitment to OECD Due Diligence Guidance, UN Guiding Principles on Business and Human Rights and RMI Cobalt and Joint Due Diligence Refiners Standards
- Internal reviews, second-party and third-party audits
- Public reporting through the third-party assured Clean Cobalt & Copper Performance Report

Goal 2 Clean cobalt and copper is sourced without child labour

Compliance statement

Metalkol has established processes and controls to prevent child labour in its operations and respect workers' rights to fair and decent employment terms. These processes and controls ensure we abide by DRC labour legislation and comply with the relevant ILO Conventions, including those on Child Labour.

Performance statements

Child and Forced Labour

Metalkol has established processes and controls to prevent child labour in its operations. The ERG Code of Conduct, Supplier Code of Conduct and Human Rights Policy contain explicit prohibitions on child labour and require business partners to have in place processes to verify the age of employees and new applicants.

Metalkol has established processes and controls aimed at ensuring all of our workforce (including contractors) are above 18 years old and have a valid labour contract. Our policies, including our Recruitment and Selection Policy, do not permit employees or workers of our contractors to be below 18 years of age. An age-check is performed during the onboarding process, when staff members or staff of contractors are issued a site-pass. We, or our contractors, will keep a record of all IDs and proof of age (through HR personnel information sheet). Security personnel are made aware of our zero tolerance of child labour and keep patrol schedules and logs. The Labour Inspector of the DRC government verifies the employment contracts compliance with DRC Labour Regulation during their site inspections.

An Access Control Procedure is in place which is conducted by both Security and Human Resources. Every person within our operational area must be admitted through access control, which includes an identity check. Entry into an operational area is not possible without passing the access control. The system is designed to apply multiple layers of control, including facial recognition technology, integrated with security, human resources and contractor management systems.

Any visitors are issued passes only upon receipt and verification of identification documents.

Our standard contract requires all our contractors to abide by DRC labour law and stipulates a right for Metalkol to audit contractors. Our Supplier Code of Conduct references child labour and requires contractors to have in place procedures to verify the age of employees. In addition, we proactively communicate and mitigate the risk of child labour through the promotion of our Human Rights Policy, whistleblowing hotline, and grievance mechanism.

We manage the risk of child labour also through our ASM Management Plan and Chain of Custody Procedure, ensuring that our product only comes from our operations, and through community investment projects such as the Good Shepherd Sisters' livelihoods programs, we invest in child labour prevention.

The human rights risk assessment process has not identified direct child labour as a risk at the Metalkol operation but as a risk in the broader regional context.

The ERG Code of Conduct, ERG Supplier Code of Conduct and Human Rights Policy also contain explicit prohibitions on forced labour including reference to ILO conventions, UNGPs and UN Declaration on Human Rights. The DRC Labour Code provides specific requirements in relation to working conditions, expat management, salaries payment conditions and timelines. As per labour inspections, Metalkol did not have any non-compliance in this regard. Actions in place to prevent and mitigate risks of forced labour include training and awareness, as well as requirements to adhere to the human resources procedures. For contractors' compliance audits, please refer to the above "Systems for managing supplier risk" section.

At Metalkol, Human Resources monitors and reports on a monthly basis the execution and compliance of the applicable procedures and regulations. Metalkol is inspected by the Ministry of Labor at least annually and all contractors and suppliers have access to Metalkol's grievance mechanism and whistleblowing process. Labour brokers are audited for compliance with requirements. No specific cases of child or forced labour were reported during the assessment period.

Fair and decent employment

The ERG Human Rights Policy and Code of Conduct states that employees should be treated fairly and impartially in all aspects of employment and compliance with applicable employment laws in all the countries in which it operates is mandatory. This means observing those laws that pertain to freedom of association (unions), privacy, recognition of the right to engage in collective bargaining, the prohibition of forced, compulsory and child labour and prohibition of any illegal employment discrimination or harassment.

The right to freedom of association and collective bargaining in the DRC is covered under the national Labor Code. At Metalkol, based on regulation and its Human Resources policies, there is an implemented collective bargaining agreement in place which covers the company's relationship with unions at the site and which goes beyond national labour laws. Any non-compliance with the Policy should be reported to the Compliance Officer, Group Head of International Compliance or the Company Hotline. Employees who violate this Policy will be subject to disciplinary measures subject to local law and Code of Conduct, up to and including termination of their employment. Quarterly monitoring reports are submitted to the Group. Metalkol is currently in the process of reviewing its collective bargaining agreement with the union and will undertake a consultation with unions to identify opportunities to strengthen its internal grievance mechanism to ensure formal complaint channels are appropriate to local stakeholders, while complying with international standards.

Since suppliers must comply with all applicable employment laws and regulations, they are expected to comply to the right to freedom of association and collective bargaining.

As part of ERG Code of Conduct, Supplier Code of Conduct, and the corporate Human Rights Policy, ERG strives to treat employees fairly, without discrimination or harassment, and impartially in all aspects of employment and to comply with applicable employment laws in all the countries in which it operates. This means observing those laws that pertain to the prohibition of any illegal employment discrimination or harassment. We apply these commitments to our employees, our contractors and our suppliers.

At Metalkol, discrimination was identified as most likely on a basis of gender based on two grievances received during the reporting period (2023: 0). As a result, the Sexual Harassment Policy has been reinforced to prevent gender discrimination and sexual harassment in the workplace, and provides appropriate procedures to deal with any sexual harassment problem that arises, and to prevent its recurrence. This policy covers all employees, new applicants, clients, suppliers, contractors and any other persons who have dealings with the business. Action planning and implementation of the Policy based on the received grievances is monitored by the site Human Resources team and specific KPIs are being established to ensure monitoring in cooperation with the Women's Committee whose current focus is on harassment and empowerment.

The Equity, Diversity and Localisation Policy also provides protection for employees from discrimination on arbitrary grounds and sets out the principles to be pursued in employment practices, training, development opportunities and the provision of benefits and empowerment opportunities. The Collective Agreement and DRC Labour law also provides for the prohibition against discrimination, harassment and the promotion of empowerment opportunities based on the DRC Constitution. The Equity, Diversity and Localisation Policy also commits Metalkol to recruit in a manner that will aim to ensure the workforce is representative at all levels of the economically active population in the Lualaba province and includes recruitment targets for female employment (at least 20% of total workforce) and for national and regional employment (60% of national employees should be from the Lualaba and Haut Katanga provinces, with a specific focus on the hosting communities and the rest of the 40% could be recruited nationally from other DRC provinces).

Gender equity is considered during budgeting and recruitment processes. Metalkol's monthly headcount report monitors the gender equity and national/expat rates, and the site annually reports to the Ministry of Labour authorities the gender, national/ expat and positions grade rates.

Succession and career development plans are completed with in order to ensure an equal opportunity of development, with emphasis on the development of DRC nationals. As part of Metalkol's mentorship program, experienced expatriate staff are required to identify DRC national staff as their buddy for upskilling opportunities. The MCOO and Head of Human Resources are accountable for leading the execution of this Policy. Data is regularly collected, monitored and analysed in order to gauge the effectiveness of the policy, employment contracts clause, and Collective Agreement implementation. For any issues, the Metalkol Grievance Mechanism or Whistleblowing process is available. Metalkol has in place a Women's Committee which meets monthly and considers issues relating to female participation and empowerment.

In 2023, Metalkol launched an internal Women in Mining development program which resulted in 8 women upgrading their positions. In 2025, 3 women passed all the tests to join the Emergency Response Team.

The working hours of all Metalkol staff may not exceed 45 hours per week in accordance with the provisions of sections 119 and 121 of the Labour Rights Act. Night work gives rise to a wage increase in accordance with the Collective Agreement, at 30% of the basic wage. The Overtime Policy explains when compensation becomes applicable and the procedure to follow for request and authorisation. The company Overtime Policy exceeds the DRC Labour law regarding limitations and benefits calculations.

The pay and benefit rates have been agreed under the Collective Agreement with unions and exceeds minimum living wage and national barometers. Benefits include medical care, leave, allowance, transport, children's schooling, extra-legal family allowances, bereavement. A living wage assessment will be conducted in 2025, and engagement has commenced with stakeholders to ensure a common approach to living wage assessment is undertaken across our region of operations and industry.

Health and Safety

Health and Safety is a top priority at ERG and Metalkol as set out in the ERG Code of Conduct and ERG Africa Sustainability, Health and Safety Policy. At Metalkol, a comprehensive health and safety management system has been implemented for risks and impacts for employees, suppliers and surrounding communities. All employees and contractors must undertake health and safety training and wear task appropriate PPE. The management system consists of a set of health and safety procedures and management plans which are informed by ISO 45001, against which Metalkol is in the process of being certified.

Key elements of the Occupational Health and Safety (OHS) series of procedures include:

- Identify, assess and mitigate potential OHS hazards and risks;
- Provide required workplace training;
- Use of prescribed appropriate PPE;
- Improve and promote safety and occupational health performance through monitoring and reporting;
- Consult, collaborate, and communicate with employees, contractors, community, and other relevant stakeholders on occupational health matters;
- Measure and monitor occupational health exposures and mitigate any exceedances as per the Metalkol occupational health exposure monitoring plan;

The Risk assessment methodologies outline the mechanism for hazard identification and assessment of normal, abnormal & emergency operations assessment activities. The main components of the risk management procedure include:

- Enterprise Risk Management;
- Issue-based risk assessment;
- Job Safety and Environment Assessment;
- Hazard reporting; and
- Risk assessment during Management of Change (MoC).

Risk Management for significant risks is integrated with the enterprise risk process, as specified in the Enterprise Risk Management Manual and associated risk register. The risk register is reviewed and if necessary, updated quarterly or following any significant incident, to ensure that the risk controls have achieved, and are continuing to achieve, the intended risk reduction to an acceptable level.

While it is the MCOO's responsibility to ensure risk assessment principles are applied to all existing and planned work prior to execution, each Head of Department is accountable for the SHS performance in their team and performing their work in accordance with the SHS requirements. This includes ensuring that the activities are performed according to the relevant management systems, implementing any specific SHS control as required by the latter, conducting risk assessments, design and implement safe work methods and SOPs aimed at reducing risk, promote Visible Felt Leadership (VFL), task observation, incident investigations and consultation process with their employees, among other initiatives.

In addition, the SHS management system framework subscribes to the Plan-Do-Check-Act (PDCA) methodology used in international management standards to ensure continuous improvement of our SHS performance through the implementation and maintenance of fourteen management system standards as per ISO requirements.

As reinforcing our Health & Safety programs to achieve Zero Harm is a management priority, ERG Africa has revised its OHS reporting culture to ensure data reliability in terms of identified potential risks, accident prevention, and ultimately working towards an improved overall workplace safety and well-being. In terms of total H&S hazards, 155 were recorded in 2024, a 7% reduction from 2023. Preventatively, a total of 12,635 regular medical examinations for employees and 3,234 medical examinations for contractors were performed at the site clinic in 2024.

Safety Statistics for 2024

Lost Time Injury Frequency Rate (LTIFR)	0.44
Fatalities	0
Lost Time Injury	6
Medical Treatment Case	11
Restricted Work Cases	2
Employees on site	2175
Contractors on Site	1935
Visible Felt Leadership interactions	8241

Metalkol is implementing long-term corrective measures including but not limited to eliminating hazards through engineering controls, revising its SHS management system as required upon post-incident inspections & lessons learned, providing training & awareness to its stakeholders, ensuring appropriate PPE use. Health and Safety statistics are reviewed daily at Metalkol and reported monthly to ERG Africa management and quarterly to the ERG Africa Sustainability Committee and to the Board. These are reported on an aggregated basis in the ERG Sustainability Development Report and upcoming ERG Africa Integrated Annual Report 2024 and in Metalkol's Clean Cobalt & Copper Framework Performance Report.

Summary of management systems and controls

- Recruitment and Selection Policy with age checks and proof of ID
- Access Control Procedure including identity checks
- Age requirements in supplier contracts and Supplier Code of Conduct
- Supplier audits
- ASM Management Plan and Chain of Custody Procedure
- Human Resources Policies including Diversity, Equity and Inclusion considerations
- Community engagement and investment to highlight and address risks of unfair employment including child labour
- Collective agreement
- Health and safety procedures and management system

Goal 3 Clean cobalt and copper is traceable

Compliance statement

Metalkol has established processes and controls for the implementation of a chain of custody from the point of extraction up to point of sale to a customer.

Extraction and production overview

Metalkol extracts tailings from two deposits, the Kingamyambo tailings facility and the Musonoi River tailings. The historical tailings are reprocessed at a centralised hydrometallurgical facility. The end products are high-quality copper cathode and cobalt in hydroxide. Waste generated during the production process is deposited in the Residue Storage Facility, also known as the RSF.

Kingamyambo is a conventional tailings facility, which holds approximately one-third of total copper and cobalt resources at Metalkol and has been the primary source of feed for the processing plant to date. Tailings from Kingamyambo are extracted via hydrosluicing, also known as high-pressure water blasting or monitoring.

Musonoi is a tailings deposit formed by direct tailings discharge into the Musonoi River, behind a dam constructed at Kasobantu. Material is extracted through a combination of hydrosluicing and excavation, and also dredging.

The slurry collected at the plant feed tanks at Musonoi and Kingamyambo is pumped to the processing plant through overland pipelines. The processing of the slurry from Kingamyambo and Musonoi is conducted at a conventional hydrometallurgical facility which consists of feed dewatering, copper and cobalt leaching, split high-grade and low-grade solvent extraction, copper electrowinning. Cobalt is recovered as a hydroxide from the raffinate solution after a purification process to remove impurities.

The production is reported on a daily 24-hour cycle from operations records based on plant routing sampling, slurry and solution mass and flow measurements. The aggregated measurements are used to calculate recovery of metals from the ore. The process plant is controlled and operated on from a centralised control room utilising a supervisory control and data acquisition (SCADA) system architecture that comprises computers, networked data communications and graphical user interfaces for high-level supervision of machines and processes. The plant volumetric monitoring and control are achieved by integrated sensors and other devices, such as programmable logic controllers, which interface with process plant or machinery.

Chain of Custody Management System

Metalkol has in place a Cobalt Chain of Custody Procedure and a Copper Chain of Custody Procedure and has developed related systems to ensure our product is traceable. These procedures outline the chain of custody management system for copper and cobalt and related roles and responsibilities of various departments. It includes provisions for material segregation, bagging and tagging of cobalt hydroxide, bundling of copper, transportation, warehousing, data management, sign off and approvals, incident management, training and communication, and third-party audits. The procedure enables our material to be traced back to the date, shift, and point of extraction, and allows for verification of the flow and handling of product, including all stages of transformation, physical transfer and storage.

Our Chain of Custody Management System consists of three major stages: origination, processing and transport. At the first stage of our product chain, between the extraction point and our plant, we have implemented the following physical controls: we have fenced pumping stations and the Kingamyambo tailings and have systems in place to secure the extraction area that is not fenced (extraction from the Musonoi River). Permanent security guards are placed around these points, and security patrols are conducted from the extraction points along the pipelines to the plant. The extracted tailings are fed from these secured areas into a closed and secured pipeline system which brings the extracted material to our processing plant.

At the second stage of our product chain, material enters from the pipeline into our secured processing plant and production line. The plant area is fenced, and security surveillance and patrols are in place. Within the plant, processes are closely monitored – we take manual assay samples at the extraction points and automatic assay samples within the plant at every stage of the production process in order to cross-check whether the material's consistency differs from that of the extraction point for quality purposes.

At the end of processing, our cobalt product is bagged, data recorded, assayed and, once in commercial production, will be secured with tamper-resistant tags including GPS tracking devices. Every bag is marked with a unique identification number/bar code, a lot number, its weight and shift of bagging. The bagged and tagged product is loaded to trucks in lots.

Bags are monitored and tracked from the on-site export area to the customer, by applying weight controls, visual inspections, GPS tracking of trucks and accompaniment by contract security personnel in high-risk areas.

In relation to our copper product, Metalkol electrowins copper in tank houses which is completed with the formation of bundles of cathodes. Upon pulling of cathodes from the cell, the cathodes are washed and stripped from steel plates using semi-automated machines. Thereafter the stripped copper is weighed prior to handing over for export.

Copper cathodes are weighed, marked and strapped, data recorded, bundles are tagged and loaded to trucks in lots. Bundles are transported in lots and are monitored and tracked from the on-site export area to the customer, by applying weight controls, visual inspections, GPS tracking of trucks and accompaniment by security personnel.

To enhance and further automate data management, Metalkol has developed a digital data management system, which keeps a record with key data on who handled the product, in what form, in which location and when, supported by evidence and verified through checks and balances.

Transporters and warehouses involved in the transportation to customer prior to the transfer to customer are subject to the diligence processes set out in the supplier risk section above.

ERG wholly owned affiliate SABOT provides dedicated logistics of copper and cobalt products through a combined fleet of trucks.

Summary of management systems and controls

- Closed loop production system with automated monitoring and data reporting
- Chain of Custody Procedures and digital data management system
- Physical controls including fencing and security
- ASM Management Plan and Confiscated Ore Procedure
- Transportation Management plan in effect for transporters
- SABOT subject to ERG policies and procedures

Goal 4 No cobalt or copper is sourced from Artisanal and Small-Scale Mining

Compliance statement

Metalkol has established processes and controls to monitor, assess and mitigate risks associated with Artisanal and Small-scale Mining (ASM), including security-related impacts on affected stakeholders. Metalkol does not purchase ASM material.

Performance statements

Metalkol operates in the Kolwezi area of DRC where ASM activity is often the only or best source of income for many people. For those engaged in ASM, it can be dangerous and one which potentially impacts the environment negatively. Metalkol does not have business relationships with ASM and does not have ASM in its supply chain. Metalkol has established an ASM Policy and ASM Management Plan implemented through a set of procedures and which outline the approach to managing ASM activities on and around the concession area. Metalkol engages with local ASM cooperatives in relation to safety and the environment, and with ASM stakeholders as part of community engagement in the broader community.

Metalkol acknowledges the important role that ASM plays in supporting much-needed livelihoods in the DRC and in this context, we support a range of external initiatives to help improve the lives of local communities near Metalkol. This includes a focus on helping children and young people transition out of artisanal mining, strengthening the capacity of local communities and supporting the development of a formalisation framework for responsible ASM. ERG has also been active through the GIZ-led Cobalt for Development initiative supporting formalisation and professionalisation of ASM in the region.

A cross-departmental joint ASM working group has been established and the ESG-HR Working Group addresses any potential ASM issues and is responsible for overseeing ASM related incidents, risks and mitigation plans.

Metalkol has established an ASM Monitoring and Reporting procedure for recording ASM developments on and around the concession, including ASM incident reporting and community grievance system. The ASM Management Plan differentiates approaches depending on the type of ASM activity and location. Security procedures are in place based on the Voluntary Principles on Security and Human Rights (VPSHR) and a train the trainer programme was developed by international NGO PACT and implemented on site. Metalkol representatives participate in regional Voluntary Principles Working Groups addressing the effective application of the VPSHR. A further exercise with another independent third party (DCAF and Justicia) to review the VPSHR training, conduct additional internal and external training and a review of the grievance mechanism is underway.

ASM activities are reported in the ERG Sustainable Development Report, the upcoming ERG Africa Integrated Annual Report 2024 and the Clean Cobalt & Copper Framework Performance Report. Outside the secured areas, but still on Metalkol's concession, we tolerate public access and ASM activities, as long as they do not interfere with Metalkol's operations. However, ASM mining and digging operations in these areas are not authorised by Metalkol. Metalkol will report new mining and digging operations on the concession that are not able to be resolved by Metalkol community relations or security to the holder of the subsurface rights. Material mined from ASM and unknown sources on the concession is kept separate from Metalkol's processing in a secured area and the legal owner of the subsurface rights notified. Outside the concession, Metalkol monitors ASM activities in the close surroundings.

Metalkol does not source or buy material from any other source including ASM. Our Chain of Custody Procedures ensure that our product only originates from our operations and remains in a closed loop from extraction to processing. Our processing plant can only process tailings material, not ore; any other material is discarded. The tailings pump stations at Kingamyambo and Musonoi are fenced with a 24-hour security patrol. The processing plant is located in a restricted access area.

The ERG Human Rights Policy includes commitments towards the VPSHRs principles and UNGPs. ERG operations in the DRC support the provincial Voluntary Principles (VPs) Working Groups and works closely with the DRC official facilitator (Justicia) and observer (DCAF). Procedures are in place related to public and private security and human rights and are aligned to the VPs.

Metalkol's Human Rights Statement includes specific reference to security and human rights and also implements a set of Security procedures in relation to human rights and security, including use of force, and use of public and private security.

These procedures are aligned with the Voluntary Principles on Security and Human Rights, UNGPs, and the OECD DD Guidance. MOUs are in place with public law enforcement agencies, including the requirements set out in the VPs. In 2024, 100% of our private security personnel due for annual training refreshers were trained on the Voluntary Principles on Security and Human Rights. This alignment was confirmed with DCAF and Justicia visits carried out in August 2025 to provide further assurance in relation to our management systems, including the assurance that Metalkol does not directly or indirectly support non-state armed groups.

At Metalkol, our guiding principles on human rights and security are documented and communicated in the 12 Golden Rules for Security and our private security provider (AGS) is an ICoCA member. If disagreements or issues with the community arise, the site's Community Liaison Officer is immediately informed, and resolution should be sought through the site's grievance mechanism and stakeholder engagement processes.

Issues and risks related to security and human rights are reported to, and recommendations developed by the ESG-HR Working Group.

Summary of management systems and controls

- ASM Policy, Management Plan and Procedures including reporting
- ASM Joint Working Group
- Human Rights Policy and 12 Golden Rules of Security
- Security procedures and management systems, incl. training
- Chain of Custody Procedure including security patrol and fencing
- Community engagement and investment
- Voluntary Principles alignment and participation in regional Working Groups
- Support for development of responsible cobalt ASM standard and legitimate production
- MOUs with public law enforcement agencies

Goal 5 Restoring the environment

Compliance statement

Metalkol reclaims legacy tailings from the historical Kingamyambo tailings dam and the Musonoi River basin. We are implementing an environmental management system that is aligned to ISO 14001 Standards.

Performance statements

In 2020, Metalkol reached full Phase 1 production comprising the extraction and re-processing of historical, non-Metalkol tailings which are contaminating the natural environment of the Kingamyambo tailings dam and the Musonoi River and consolidates the residual waste in a modern tailings storage facility.

Metalkol implements an Environmental Management System aligned to ISO 14001 and ISO certification is underway in 2025.

Water

Metalkol operates a closed loop system, and no process water is discharged from our site other than in exceptional circumstances after testing to ensure compliance with permitting requirements and water standards. A monitoring programme and stations have been set up for surface water and ground water monitoring as per statutory requirements and the approved ESIA. Results are verified via external laboratory analysis and are reviewed by third parties. Maps of our surface water monitoring and borehole monitoring have been published in the Clean Cobalt and Copper Performance Report 2024. Monthly reports are provided to the MCOO and bi-monthly to the DRC government and water management is publicly reported in the ERG Sustainable Development Reports, upcoming ERG Africa Integrated Annual Report 2024 and this Clean Cobalt & Copper Framework Performance Report.

The Metalkol water management plan is informed by the IFC Performance Standards and includes:

- An upstream / downstream and tributaries water quality monitoring system to monitor (in line with relevant DRC regulatory requirements and WHO standards) the quality, flowrate, and drawdown levels of local surface water (monthly), groundwater (quarterly) and drinking water (monthly) – with testing results subjected to accredited laboratory analysis. Metalkol uses channels and trenches through its tailing deposit, to reduce the high TSS (Total Suspended Solid) content in the turbid water. The system is set to reduce the water velocity and thus allow decantation before water exits the mine site. The TSS content in the inlet water averages 323 mg/L. The average content at the outlet of the mine site is 164 mg/L. The flowrate is monitored by data loggers installed at inlets and outlets of the mine site allowing adequate velocity control plans.
- Focus on the use of recycled water, with groundwater and surface water abstraction minimised to 10% and 13% respectively, of the total water utilised at the mine site. The groundwater abstraction is conducted through a strict daily water level drawdown monitoring program. The existing numerical groundwater flow model provides guidance on the groundwater flow abstraction rate for the life of mine. From 1 May 2023 to 30 April 2024, a total volume of 19,285,461m³ of water was re-used in the mine site for various purposes. The total volume re-used from 1 May 2024 to 30 April 2025 was 19,721,534m³.
- Compliance with WHO and DRC Standards for drinking and domestic water as demonstrated by Hydro-geochemistry and Microbiological water results conducted at international accredited laboratories.
- Recirculation of all the operation's process water without it being discharged to the environment, except for exceptional events during periods of very heavy rain. Where process water is discharged in such circumstances, it is subject to a monitoring program to ensure it stays within permitted limits, thus complying with the DRC regulations. Live monitoring through SCADA is conducted to ensure no leakages and water loss into the environment across the site. There was no water discharged into the environment from 1 May 2023 to date.
- Implementation of a range of measures to prevent and contain potential acid spillages, including automated truck unloading systems, bunding and specialised storage systems
- Use of recycled water and molasses to suppress road dust.

As part of ongoing stakeholder engagement and community development consultations, access to clean water and regional water quality are identified as a main risk and priority topic. Metalkol engages with NGOs and other stakeholders who raise concerns related to water management and publishes specific responses to published reports on the ERG website.

Climate and GHG

ERG's corporate commitment on climate change is articulated in the Group Climate Change Impact and Adaptation Management Policy, and the company is committed to achieving Net Zero by 2050. The Group will play its part in meeting climate change challenges, including through our role in supplying metals such as cobalt and copper, and ERG intends to enhance its climate resilience by ensuring compliance with current and future GHG emission regulations in the regions in which it operates, considering the cost of GHG emissions in business decisions, using carbon trading markets to balance emissions, identifying the potential long-term impact of climate change on the Group's operations and developing necessary responses taking into account the potential impact on local communities.

At Metalkol, the latest ESIA considered the carbon dioxide equivalent (tCO₂e) emitted annually by the operation to be medium-high risk. To mitigate this risk, Metalkol has optimized the mining methodology of load and haul stockpile to dredge mining. In addition, due to improved maintenance and operational efficiencies, the diesel generated powerhouse was optimized to reduce emissions by 20%. The power procurement with Société Nationale d'Électricité (SNEL), the energy state-owned company in the DRC, has also been expanded in scope to increase hydro-electric power supply. The predicted PM₁₀, PM_{2.5}, SO₂, NO₂ concentrations/emissions are below the IFC guideline and DRC standards at all sensitive receptors for all assessment periods.

Metalkol has recently partnered with a third party to deliver an AI-solution used by the UN, to reduce the site carbon footprint over the life cycle of our products. The solution will aim to deliver a comprehensive integrated climate change reporting, mitigation and adaptation strategy and plan. Metalkol also works with its customers on climate; for example, we have an MoU with a customer which aims to gain and share insights on decarbonization plans, as well as identify projects that could accelerate the GHG performance of the common value chain.

Metalkol implements a GHG emissions monitoring programme. For 2021 and 2022, a carbon footprint calculation against the Global Battery Alliance GHG emission rulebook was completed. This led to the development of the Metalkol GHG roadmap with implementation commencing in 2024 and being further developed with a third-party specialist. The current focus is to improve data collection and scope 3 calculations and to implement proven initiatives. The plan will enforce new clauses in contractual terms, further embed emissions in procurement and logistics decision making, obtain buy in from main suppliers to validate current decarbonization strategies and refine the reporting strategy for internal and external stakeholders. In 2023, a carbon calculation was conducted as part of the Cobalt Institute LCA study and for 2024, the calculation will use the AI-solution to elaborate on the below preliminary results.

The 2023 preliminary data has demonstrated progress from the previous 2019 LCA as follows:

1 kg CO in Co (OH) ₂	Scope 1	Scope 2	Scope 3
2019 -GWP	5.3	1.27	14.6
2023 – GWP	4.2	0.22	3.98

In 2025, an internal greenhouse calculation for 2024 has been performed, resulting in:

- Total GWP per unit of cobalt: 4.57 per kg CO₂/kg
- Total GWP per unit of copper: 4,57 per kg CO₂/kg

Metalkol will therefore elaborate on its current carbon footprint calculation and have in place a real-time monitoring system to implement advanced methodologies to accurately measure and analyze GHG emissions across its mining operations. The AI solution will identify significant sources of emissions and pinpoint principal opportunities for reduction, including Scope 3. Targets meeting Science Based Targets Initiative will also be identified and set and reporting standards implemented.

Metalkol is largely supplied by power from DRC utility SNEL, which is highly reliant on hydropower. Supply outages have been a longstanding challenge in the country due to national structural energy deficit, poor infrastructure and inadequate water levels. Regional energy challenges have become more serious, partly reflecting new demand, weather patterns and an increase in copper cable theft. This contributed to an increased need to use back up diesel generators at Metalkol. To help address these challenges we are actively investigating alternatives through the potential development or support for renewable energy projects (e.g. solar and apply fast acting battery-based backup systems for outages). We are also engaging with peers in the region to explore collective approaches to improvements to the public power grid. In 2024, based on its GHG roadmap and collaboration with its power contractor, the Site initiated a “Fuel Saving Program & ESG Initiative” which has resulted in a 21% improvement. The specific results are as follows:

- Fuel saving: 14,429,651.12 liters or \$18.7M
- CO₂ emission reduction: 47,762,145.22 kg Co₂/L

We disclose aggregated data on CO₂ emission in the ERG Sustainable Development Report, upcoming ERG Africa Integrated Annual Report 2024 and Clean Cobalt & Copper Framework Performance Report.

Pollution management

Metalkol implements an Environmental Management System which is informed by ISO 14001 and includes procedures and plans related to pollution risk management including water, soil, air quality and noise. ISO certification is underway in 2025. The 2022 approved ESIA includes evaluation of the potential effects of Metalkol operations in terms of pollution to groundwater, soils, surface water and air. The ESIA includes a Pollution Management Plan which identifies the required mitigation interventions to address potential adverse impacts. This includes monitoring programs to maintain levels within regulated limits. Environmental risks have been added to the ESG-HR Working Group Risk Register which enables the site to better manage their risks by ensuring timely mitigation measures in place. Overall, during the reporting period, the environmental monitoring system shows a satisfactory performance (within national limits), particularly for TDS (Total Dissolved Solids), groundwater and drinking water parameters. However, two parameters were non-compliant to DRC limits: noise and effluent pH.

The noise non-compliance is found to be as a result of noise from nearby communities and Metalkol will integrate activities to raise awareness about high noise levels and consult the communities to find remediation measures.

The highest-ranking pollution risk relates to discharge of acidic solution into the environment. To mitigate this risk, level transmitters have been installed in event ponds, an environmental spill pond has been constructed and commissioned, and protective berms have been constructed.

Based on the ESIA, Metalkol submits an annual progress report to the DRC authorities and reports annually on environmental performance in the ERG Sustainable Development Reports, upcoming ERG Africa Integrated Annual Report 2024 and Clean Cobalt & Copper Framework Performance Report.

Waste and Circularity

The ERG 2025 Business Strategy includes a focus on the safe management of our large-scale waste storage facilities, as well as responsible approaches to waste management, recycling and the promotion of a circular economy.

As ERG is committed to minimizing waste generation at source and facilitate repair, reuse, and recycling over the disposal of waste, a proper non-tailings waste management system and approved waste landfill site is in place at Metalkol.

Metalkol implements an Environmental Management System informed by ISO 14001 including procedures and plans related to waste management including reprocessing, recycling and commercialization of waste. ISO certification is being undertaken in 2025. The purpose of this management plan is to ensure that legal requirements with respect to Waste Management are defined and that all departments and its contractors comply with them, responsibilities are clearly defined, and waste landfill is safely and effectively managed. Metalkol's waste management plan is aimed at ensuring good waste and landfill management and to avoid severe environmental and health problems, including water and soil contamination, disease outbreaks, and contribute to climate change management. Waste is separated into streams, disposed into demarcated waste trenches, compacted and covered with a layer of soil. A water monitoring program is in place to identify leachate from the landfill site. Designated landfills include industrial, hydrocarbon, and domestic landfills, as well as a waste incinerator and building rubble area. As Metalkol does not export hazardous wastes, the Basel Convention is not included in scope. In addition, a biodegradable waste stream has been identified to generate compost for rehabilitation. In accordance with the protocol on the management of Hazardous Materials, in 2024, Metalkol responsibly collected and treated before disposal the following non-recyclable waste:

Type of non-recyclable waste	Unit	2024	Type of non-recyclable waste	Unit	2024
Contaminated soil	Kg	9,996,519	Used Anthracite Media (m3)	m ³	83,331
Expired Reagents	Kg	60,085	Used Crud	m ³	52,219
Used Oil	m ³	198	Scaling	Kg	828,720
Liquid Expired chemical	L	1,000	Fluorescent ampule	Per unit	212
Solid Expired chemical	Kg	4,600	Fluorescent tube	Per unit	261
Used Cartridges	Per unit	58	Empty metallic Drums	Per unit	395
Ashes (waste burnt)	Kg	97,980	Empty Cans (cadmium)	Kg	1,920
Degraded Organic (kg)	Kg	10	Fire Extinguisher	Kg	475

*Tailings dumped at RSF is monitored separately – please refer to the Tailings subchapter

Feasibility studies are being conducted on the transformation of waste into energy including biomass and combustible waste-to-energy.

The ERG Sustainable Development report provides data on waste management processes and the upcoming ERG Africa Integrated Annual Report 2024 will provide data on waste generation at sites.

Furthermore, at ERG Africa, a circular economy management system is currently being developed in collaboration with the Procurement and SHEC teams which will allow formalization of past activities such as selling scrap and other waste types into a larger project. Partnerships have been established with local recycling companies aiming to extend this program to communities as the 2024 recycled/ reused waste was valued at 0.16\$m, representing a potential opportunity for alternative livelihoods. The ERG Africa Power team is exploring opportunities to implement waste-to-energy initiatives which will aim at reducing landfill waste in the municipalities we operate in.

At Metalkol, an assessment of the circularity of waste materials is ongoing which will confirm the site's circularity targets.

Tailings

All ERG Africa established large-scale tailings storage facilities are subject to regular, legally mandated monitoring inspections. These are carried out by official inspectors, external specialists and our own teams. We are in the process of enhancing our related management systems to ensure a consistent approach to tailings that is aligned with the Global Industry Standard on Tailings Management (GISTM).

In 2023, a new TSF Management System for the ERG Africa operations in DRC was established and we continued an independent, third-party risk review process focused on the condition of our TSFs. Reviews are carried out by external Engineers of Record and are focused on (among other things) operating conditions, compliance with design parameters and potential risks to local populations and the environment. The review process references national and international regulations and standards, including the Canadian Dam Association (CDA) Dam Safety Guidelines and guidance from the International Commission on Large Dams (ICOLD).

Given the nature of Metalkol's activities in reprocessing tailings, Metalkol has a different type of mining method as it extracts historical legacy tailings from two deposits, the Kingamyambo Tailings Facility and the Musonoi River Tailings. The historical tailings are reprocessed at a centralised hydrometallurgical facility and waste generated during the production process is deposited in the Residual Storage Facility (RSF). This facility is operated using the Residues Storage Facility Operations, Maintenance and Surveillance (OMS) manual.

The three main risks identified in relation to tailings at Metalkol are:

- The physical integrity of the waste structures
- Avoiding groundwater and surface water pollution from the facilities
- Preventing dust emissions

These risks are assessed for the RSF under normal operating conditions and under adverse conditions including underdrain failure and a seismic event (note the site is located in a low seismic hazard area with the pga of 0.4 m/s²). The Factors of Safety and Probability of Failure results indicate that the stability of the outer wall design is acceptable. In terms of the water pollution risk mitigation measures please refer to the section "Water" of this report, while our dust prevention system is explained under the "Pollution management" section.

In 2024, Metalkol continued an independent, third-party risk review process focused on the condition of the RSF and is continuing to act on the recommendations, including:

- Additional 'deep-dive' investigations into potential issues – including cone penetration testing, updated stability analysis and risk assessments
- Improved policies and procedures
- The appointment of an Accountable Executive (AE) (completed), formalization of appointment of the Responsible Tailings Facility Engineer (RTFE) and the appointment of a new EOR (completed) and the Independent Tailings Review Board (ITRB) (underway)
- Establishing an internal TSF/RSF committee to be more effective in the case of emergencies and provide internal tailings governance
- The application of automated monitoring technology

Production is reported on a daily 24-hour cycle from operations records based on plant routing sampling, slurry and solution mass and flow measurements. The process plant is controlled and operated from a centralised control room utilising a supervisory control and data acquisition (SCADA) system architecture that comprises computers, networked data communications and graphical user interfaces for high-level supervision of machines and processes. The plant volumetric monitoring and control are achieved by integrated sensors and other devices, such as programmable logic controllers, which interface with process plant or machinery. Performance of the RSF is reported monthly, including inspections, measurement and recording of monitoring items as per the OMS related to the RSF. Additionally, the inspections involve a detailed visual inspection of all RSF components to ensure they are operating as per the design intent.

Besides internal daily monitoring systems in place, we had reported the condition of our RSF to our previous external Engineer-of-Record (EoR) on a monthly basis, and the operation's management team also conducts quarterly RSF inspections and review meetings with the TSF/RSF Committee. An International Tailings Review Board is being appointed to provide independent technical review of the design, construction, operation, closure, and management of the Residues Storage Facilities. The independent reviewers are third parties who are not and have not been directly involved with the design or operation of the RSF. A Dam Safety Review (DSR), as part of the ongoing risk management process consistent with GISTM (August 2020) compliance for High and Very High Hazard Potential Consequence dams, is to be undertaken and will consist of a systematic review and evaluation of all aspects of design, construction, maintenance, operation, and surveillance, and other factors, processes and systems affecting the RSF safety. The Review will define and encompass all components of the "RSF system" under evaluation (including the Dam, decant system and access ways, return water dam, spillway, foundation, piping, pumping system, valve station, cyclones, etc.). The evaluation will be based on current knowledge and standards, which may be different from the acceptable standards at the time of original construction or a prior DSR. These inspections will be documented in a report and appended to or form part of the DSR assessment.

The ERG Africa Chief Technical Officer is the Accountable Executive responsible for tailings management and STATUM GEOTECNIA LTD, the EoR. There were no realized risks in this reporting period and performance will be reported in the ERG Africa Integrated Annual Report 2024.

Biodiversity

At ERG Africa, a revised biodiversity management system has been finalized. At Metalkol, the approved ESIA in 2022 includes a Biodiversity Management Plan that sets out appropriate biodiversity conservation and protection objectives to prevent the following adverse impacts:

- Loss or disturbance of natural habitat caused by vegetation clearing and earthworks
- Establishment and spread of alien invasive plant species
- Increased sediment runoff into wetland and rivers
- Loss of catchment resulting in reduced surface water flow
- Water quality deterioration - contamination of surface water entering rivers and wetlands
- Flow concentration and increased erosion to linear infrastructure crossings
- Habitat fragmentation due to linear infrastructure crossings
- Sensory disturbances of fauna (artificial lighting, vibration and noise)
- Secondary incidences of habitat loss/modification and resource exploitation
- Vegetation Clearance and Soil Removal in preparation for use of RSF including Food – Subsistence Crops, Food – Capture Fisheries, Medicinal Plants, Freshwater Suppl, Soil Stability and Erosion Control

The above ESIA and Biodiversity Management Plan has been informed by a gap analysis audit performed against IFC Performance Standards to align the submitted ESIA to international standards. This audit concluded that although the majority of the original vegetation has been destroyed or degraded due to previous industrial land use, a few remaining pockets of natural habitats do still exist within the concession area.

Therefore, key Performance Indicators have been compiled in accordance with the closure plan and the intended final use of the land for the site. These indicators will also allow us to track our ambitions of achieving not net loss and net gain of biodiversity as we decontaminate the Musonoi river from legacy deposits.

An annual environmental report is shared with the authorities which includes progress made against the ESIA management plan and the upcoming ERG Africa Integrated Annual Report 2024 consolidates all the ERG Africa sites environmental performance.

Closure and Rehabilitation

To commence preparation for rehabilitation, and as part of the ESIA and approvals process, Metalkol developed a Conceptual Closure Plan which will be updated as the operation advances and the extraction of tailings from the Musonoi River provides greater insight in terms of the original river structure. Current mine life is expected to be until 2032. Financial provision has been made for closure in accordance with the Closure Plan including the payment of required bonds to the DRC government as per the ESIA and applicable regulations.

Due to the tailings reclamation nature of Metalkol's operating model, a large amount of historical tailings are in the process of being recovered from the Musonoi and Kingamyambo areas, which will effectively lead to the rehabilitation of large areas of land and water resources.

A screening level risk assessment, undertaken as part of the closure plan compilation, has been conducted and can be summarised as follows:

IDENTIFIED POTENTIAL RISKS	UNDERTAKEN MITIGATION MEASURES
Inappropriate stockpiling of stripped topsoil on the footprint of the RSF resulting in loss of soil nutrients and breakdown of the soil structure which may require costly soils amelioration for beneficial application as growth /rehabilitation medium at closure.	During the construction phase of Metalkol the arable layer of soil cover has been stripped and stored for future rehabilitation of the mine site. A Top Soil Management Plan is in place to enable future rehabilitation based on the proposed rehabilitation and closure plan.
Tailings are not fully recovered from the Musonoi and the Kingamyambo at closure and as a result, rehabilitation efforts are made more difficult and costlier as the 'pie crust' of tailings along the banks of the river, as well as the veneer on the floor of the river or the Kingamyambo footprint, will need to be excavated and disposed of post-closure.	Once dredging of the Musonoi tailings is complete it is likely that tailings will accrue in the river over time due to up-stream mining operations, resulting in a similar pre-dredging condition of the river. For this reason, complete reinstatement and rehabilitation of the river would be futile. Rehabilitation of the Musonoi will involve a stabilization approach where the river flood plain and its banks are stabilized as dredging progresses from the Kingamyambo tailings towards the Kasobantu dam. These stabilized areas will be vegetated to further reduce erosion and contamination of tailings still to be dredged downstream with river sediment.

IDENTIFIED POTENTIAL RISKS

Adding additional suspended material load to the Musonoi River during the dredging and recovery of tailings. The local communities rely on the Musonoi river and Kasobantu dam for sustenance and if the fishery is impeded by increased sediment load in the river it could impact on the livelihoods of locals.

Plant spillages not properly controlled and managed during operations resulting in contamination of the nearby dambos. Contaminated runoff from the plant area into the dambos may result in heavy metal accumulation in the crops planted in these areas, resulting in health risks to the locals with the consumption of these crops.

Informal/artisanal mining of metalliferous/cupriferous ore currently takes place on the ERG concession below the Kingamyambo TSF and along the upper reaches of the Musonoi. Artisanal miners may attempt to mine the Kingamyambo tailings once mining in the area commences. This would put the informal miners' safety at risk, and could result in injury or health risks.

Lack of closure related stakeholder engagement during operations resulting in stakeholder engagement needing to be revised to finalise agreed post-closure land uses due to misalignment in desired post-closure land use and/or transfer of useful infrastructure to third parties.

UNDERTAKEN MITIGATION MEASURES

Focus is on the re-usage of the recycled water to preserve the natural resources and ecosystem.

Moreover, and as part of ongoing stakeholder engagement and community development consultations, access to clean water and regional water quality are priority topics. Metalkol engages with NGOs and other stakeholders who raise concerns related to water management and publishes specific responses to published reports on the ERG website based on its regular environmental monitoring programs. As a result of the community consultations leading to the new CDC signature in 2024, a Fish Farming Project has been added to our 5-year social commitment.

Level transmitters have been installed in event ponds, an environmental spill pond has been constructed and commissioned, and protective berms have been constructed. The Metalkol water management plan includes a range of measures to prevent and contain potential acid spillages, including automated truck unloading systems, bunding and specialised storage systems.

In 2023, Metalkol paid compensation to local farmers living near to Metalkol in relation to potential localised impacts to livelihoods consistent with internal procedures and applicable regulations. In 2024, Metalkol has established a partnership with the local human rights defender IBDGH to strengthen our future assessment of communities' requests for compensation.

Please refer to the Goal 4 of this report "No cobalt or copper is sourced from Artisanal and Small-Scale Mining"

The stakeholder engagement related to closure has been included in the recently revised stakeholder map and plan. Part of this plan includes conducting closure related engagement consultations in Q3 2025 when revision of the ESIA will commence.

IDENTIFIED POTENTIAL RISKS

Lack of clarity on social climate at closure in terms of the next land use.

UNDERTAKEN MITIGATION MEASURES

Since 2017, Metalkol has engaged stakeholders on land use through its stakeholder engagement program and the official consultations required to develop the site ESIA and CDCs. While the latest CDC consultations have enabled the site to focus on delivering sustainable livelihood programs around agriculture and build infrastructure to process these agriculture products over the next 5 years, the upcoming ESIA consultation will ensure alignment of expectations in terms of post-closure land use.

On the basis of international third-party expert studies, once dredging of the Musonoi tailings is completed, it is likely that tailings will continue to accrue in the river over time due to non-Metalkol up-stream mining operations, resulting in a similar pre-dredging condition of the river, and impacting the feasibility of progressive rehabilitation. Therefore, Metalkol shall start with its Closure Plan execution 1-2 years before closure (scheduled in 2032).

The stakeholder engagement related to closure has been included in the recently revised stakeholder map and plan. Part of this plan includes conducting closure related engagement consultations in Q3 2025 when revision of the ESIA will commence.

Summary of management systems and controls

- ESIA, Environmental Management System, Procedures, Conceptual Closure Plan and Reporting
- Tailings reclamation and residual tailings facility
- Closed loop water management system
- Environmental monitoring and reporting, including biodiversity, land use, water, air and noise
- Waste Management and Circular Economy Plan
- Top Soil Management Plan and Rehabilitation Plan

Goal 6 Collaborating to promote sustainable development

Compliance statement

Metalkol has in place processes and controls for engagement and collaboration with stakeholders and local communities. Through these, Metalkol mitigates social impacts and contributes to community development.

Performance statements

Metalkol has established and is implementing a Social Management System including procedures and plans for stakeholder engagement, sustainable socio-economic development, social risk and impacts, community health, safety and security, influx management, ASM management, land compensation, involuntary resettlement and livelihoods restoration and grievance management. An overview of ERG's approach to stakeholder engagement can be found in the ERG Sustainable Development Report and upcoming ERG Africa Integrated Annual Report 2024.

Community engagement and investment

The ERG Africa SHEC Policy is adopted by Metalkol and implemented through its social management system including procedures for sustainable socio-economic development. Metalkol historically adopted a strategic community investment plan, which defined the social investment process. Objectives were informed by a participatory rural appraisal process, which puts communities at the forefront and involves them in defining their needs and priorities for development.

In 2017, Metalkol conducted participatory rural appraisals covering populations affected by the project who identified priority development areas. In 2018, the revised DRC Mining Code introduced an obligation for mining companies to develop a Commitments Register (Cahier des Charges) defining social responsibilities for permit holders towards communities. This is in addition to the 0.3% of turnover contribution to community development required under the Mining Code. The Metalkol Commitments Register/Cahier des Charges, signed in November 2020 contains a set of periodic commitments negotiated and agreed upon between the company, the authorities and the nine affected communities for the implementation of sustainable development projects. The second Cahier des Charges has been negotiated and signed in April 2025 for a period of 5 years.

Metalkol also contributed beyond these requirements and partners with civil society organisations and NGOs to promote sustainable development; for example the Good Shepherd Sisters on multiple additional projects on child protection, women's empowerment, alternative livelihoods and capacity building.

Metalkol engages with international NGOs such as the African Natural Resources Watch who have raised concerns related to local procurement in the DRC mining industry. ERG Africa has committed to enhance its local procurement strategy in collaboration with the civil society to ensure community ownership (<https://miningindaba.com/articles/mining-indaba-doing-better-communities>). As a result, in 2025, Metalkol started piloting its local procurement program aiming at enabling access by local enterprises to procurement and contracting opportunities across the project lifecycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.

Implementation and progress are managed by the Metalkol communities' team and reported to the MCOO, ESG-HR Working Group and the ERG Africa Sustainability Committee. Information on community development can be found in the ERG Sustainable Development report, the upcoming ERG Africa Integrated Annual Report 2024 and Clean Cobalt & Copper Framework Performance Report.

The revised Stakeholder Engagement Procedure and Plan structures our engagement with local communities and provides the basis for Metalkol's community relations approach and priorities. Through this procedure, we have identified and mapped relevant stakeholders, which include nine communities with a population of approximately 100,000 - 150,000 people. Metalkol's engagement with these communities is structured in a Community Engagement Calendar that outlines which stakeholder we are engaging, on which scope, when, and through which engagement methods. The Procedure defines the purpose, scope, requirements and roles and responsibilities for our engagement with key stakeholders based on their ties to particular assets such as land, water, biodiversity or cultural heritage sites. For each engagement, stakeholders receive a copy of signed minutes of meetings including the agreed action plan. This approach allows the information to be accessible to the intended audience taking into account literacy, language and cultural and technological-communication barriers.

Community health and safety

Metalkol considers community health and safety as part of its Health and Safety procedures where there can be risk to communities or local environments. Metalkol's stakeholder engagement processes and community investment consider community health and safety issues and is included in the Cahier de Charges. For example, access to clean water has been prioritized by communities during engagement and Metalkol has responded by installing solar powered water pumps in the nine project affected communities and supporting local water committees. Site Environmental monitoring provide data and checks to track potential health impacts related to water, air and land and inform appropriate mitigation planning.

The ESIA identified in-migration as the key influence on community health and safety due to the potential to put pressure on basic services (health, education, water etc.) and incoming workforce potentially introducing communicable diseases. In Mitigation, Metalkol has:

- a. implemented a community environmental monitoring system which observed one exceedance since 2024 related to light and noise exposure coming from community-related activities,
- b. ensured its Cahier des Charges (CDC) and 0.3% fund social projects are increasing the availability of basic services,
- c. developed long-term partnerships with two clinics in Kolwezi and Lubumbashi to provide enhanced healthcare to our employees and their families. This includes free medical consultations, basic medications and specialist referrals.

Cultural Heritage and Indigenous Peoples

The protection of cultural and archaeological heritage is a legal requirement under provisions of the DRC 2018 Mining Code and the ERG Human Rights Policy adopts the definition of cultural heritage as per the UN International Covenant on Economic, Social and Cultural Rights (1966). The ERG Africa cultural heritage management system complies with IFC Standard 8, and the Exploration Policy is aligned to the ICMM's position statement on Protected Areas which forbids exploration and mining activities in protected and world heritage areas.

At Metalkol, the latest approved ESIA documented sites of cultural importance existing in and near the site. However, due to extensive industrial activity and land use prior to ERG's acquisition of Metalkol, the impacts on cultural and spiritual rights are considered as moderate. The Metalkol ESIA Archaeological, and Cultural Heritage Assessment sets out the mitigation plan in relation to cultural heritage. Metalkol implements a cultural heritage procedure which provides for the mapping of any identified sacred site and cultural heritage chance finds to avoid damage to cultural heritage, and if any adverse impact may occur, to implement the restricted area procedures as required by applicable laws and conduct public consultations for obtaining the appropriate authority to relocate if required. Regarding the integrity of existing restricted cultural heritage areas, inspections are conducted to ensure that possible damage, especially cumulative impacts to sites are constantly monitored.

Cultural heritage related risks have been regularly monitored, including appropriate site and vegetation clearance procedures to ensure activities do not affect sacred sites and cemeteries, including the contribution to people's sense of place.

The 2025 cultural heritage monitoring report for Metalkol provides the most current assessment of all documented Tangible Cultural Heritage (TCH) sites across the concession area. The report updates the status of 33 recognized sites and integrated the formal recognition of two additional burial sites in the Tshamundenda community. Based on the outcomes of this inspection, three main risks were identified:

- a. Delayed recognition of ceremonial sites as the area remains unregistered despite community validation
- b. Unused cemeteries in Kamimbi and Kashala risk ecological degradation
- c. Absence of demarcation for new sites poses access risks

An updated mitigation action plan includes measures to support the expedition of official documentation and boundary marking, engagement with local authorities to explore the implementation of a conservation plan for disused cemeteries, and extended cultural training will be performed, particularly to our security and contractor personnel.

In the event that complaints are made regarding impacts on cultural heritage the Grievance Mechanism is available. Any risks/progresses in this regard are publicly reported within the upcoming ERG Africa Integrated Annual Report 2024, ERG Sustainable Development Report and Clean Cobalt & Copper Framework Performance Report. During the reporting period, there were no grievances related to Cultural Heritage.

In terms of respecting the rights of Indigenous Peoples, the ERG Group Human Rights Policy has a specific clause on this topic and at ERG Africa, the Sustainable Exploration policy requires teams to pre-identify any presence of Indigenous Peoples at the very early stage of activities, and to conduct ongoing assessments throughout the life of a mine. Metalkol's Restricted Areas and Cultural Heritage procedure requires site to consult experts on present or past links to the areas should there be a cultural heritage find.

For Metalkol, an internal review of relevant data, including stakeholder engagement, and the third-party developed, governmental approved ESIA concluded that no Indigenous Peoples have been identified in the area of influence, according to the UN definition of Indigenous Peoples. As the company is committed to the IFC Performance Standards, Metalkol's Closure Plan ensures that closure planning progresses is refined during the life of the mine and that stakeholder engagement objectives includes updates of the Indigenous Peoples mapping. These engagements are integrated into our periodic ESIA and Cahier des Charges community consultations conducted by third parties and which are ultimately approved by the Government.

The Metalkol ESIA will shortly be updated and will include an updated review and consultations on Indigenous Peoples. If there are any changes in relation to the previous status (no Indigenous Peoples identified), appropriate measures will be included in the revised ESIA.

A Grievance Mechanism is available for communities to raise concerns related to cultural heritage and Indigenous Peoples.

Resettlement

The ERG Human Rights Policy requires its affiliates to avoid involuntary resettlements, and in situations where this is unavoidable, to undertake constructive engagement with community representatives which complies with national, regional and international human rights standards on resettlement and land acquisitions. ERG and Metalkol recognizes the significance and importance of properly executed resettlements according to IFC Performance Standard 5 which is implemented through Resettlement, Land Acquisition and Compensation procedures.

In 2018, Metalkol resettled 16 households from the Samukonga village to a new co-designed village with solar powered services under a Resettlement Action Plan developed in accordance with IFC PS 5. The resettlement action plan has been implemented according to IFC PS 5 and reviewed by an international third party. Metalkol maintains regular engagement with Samukonga, and a community grievance mechanism is in place, as well as ongoing maintenance support. Samukonga also benefits from our broader sustainable livelihood programmes which we are implementing as part of the Cahier des Charges and the projects emanating from the 0.3% Community Fund.

Based on Metalkol's commitment to livelihood restoration, a joint agricultural survey with the University of Lubumbashi has been conducted, which resulted in the beneficiaries' requesting a Livelihood Restoration Programme going beyond agriculture. Meanwhile, Metalkol continued support with monthly food supply and maintaining water supply systems, solar power systems and housing in the village.

In 2023, Metalkol paid compensation to local farmers living near to Metalkol in relation to potential localised impacts to livelihoods consistent with internal procedures and applicable regulations. Metalkol is collaborating with the local human rights defender IBGDH to strengthen our future assessment of communities' requests for compensation.

Summary of management systems and controls

- Social Management System, Procedures and Reporting, including community Health & Safety
- Stakeholder Engagement Procedure, Plan and calendar of engagement
- Strategic community investment plan and Commitments Register
- Resettlement and livelihoods restoration procedure and plan
- Community Grievance Mechanism and feedback boxes
- Cultural Heritage procedures and assessments of rights of Indigenous Peoples

Goal 7 Leading our industry towards more sustainable cobalt value chains

Compliance statement

Metalkol supports and participates in industry and value chain initiatives.

Performance statements

ERG was a founding member of the Global Battery Alliance, a multi-stakeholder initiative, aimed at ensuring the global battery value chain is socially responsible, environmentally and economically sustainable and circular.

Metalkol is a member of the Cobalt Institute. ERG, with other cobalt supply chain actors and peers, led and developed a blockchain tracing solution, Re|Source, intended to provide a transparent, open and global registry of sustainably sourced cobalt.

In line with our Group ERG Tax Policy, which is approved by the Board of Managers, we are committed to complying not only with the letter but also the spirit of local laws. This includes the submission of Extractive Industries Transparency Initiative (EITI) data in our host countries, where required (Kazakhstan, DRC and Zambia).

In the DRC, the country EITI status is currently “meaningful progress”. Relevant information is published in our Group Sustainable Development Report including the internal processes implemented to undertake this reporting.

The company has also appointed auditors as per OHADA requirements. The company is audited by its direct auditors (OHADA) as well as parent company auditors (IFRS). We also file the following with the Luxembourg authorities:

- Report on Payments to Governments under the EU Accounting Directive (2013/34/EU)2
- OECD Country-by-Country Report under OECD BEPS Action 13

Reports and audit findings

During the reporting period, no new negative reports referencing Metalkol were published.

The Responsible Minerals Assurance Process (RMAP)

In February 2023 and September 2024, the RMI re-confirmed that Metalkol was conformant with the Assessment Standard for Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (2021) and Cobalt (2018); The objective of the assessment is to assess the facility’s level of conformance with the Responsible Minerals Assurance Process Cobalt | Copper Standard of Cobalt 2021 | Copper 2021. The assessment was conducted in accordance with ISO19001:2011 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations. Export validation and transportation was included in the scope of the assessment. Transportation included the transportation routes and warehouses. Recertification was in progress at time of publication.

The following are long term findings from prior years where actions are still in progress:

- Certification for the ISO 45001
- Certification for the ISO 14001

No new Annex II risks were identified during this period.

Management conclusion

For the period 1 May 2024 to 31 July 2025, Metalkol implemented processes and controls for its cobalt and copper production in line with the principles and goals stated in the Clean Cobalt & Copper Framework and in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as initiating alignment with the Copper Mark assurance process.

Metalkol has developed processes and controls to implement a chain of custody, allowing our product to be tracked and traced, enabling a verified handling from the point of extraction up to our on-site warehouse. In addition, Metalkol has strengthened its processes and controls to prevent and mitigate environmental adverse impacts, improve its stakeholder engagement strategies, including complexities in relation to the intersection of large-scale mining with ASM, including security considerations.

Metalkol has managed social and environmental impacts, has contributed to community development and has supported industry initiatives on an international level.

