



INDEPENDENT REASONABLE ASSURANCE REPORT ON ERG METALKOL'S COPPER MARK SELF-ASSESSMENT OF ENRC CONGO BV AS AT 30 JUNE 2025

To the Directors of ENRC Congo BV

This report has been prepared in accordance with the terms of our engagement contract dated 3 July 2025 (the "Agreement"), whereby we have been engaged to perform a reasonable-assurance engagement in order to issue an independent reasonable assurance report in connection with ERG Metalkol's Copper Mark self-assessment in respect of responsible mining production of copper and cobalt as at 30 June 2025 (the 'Subject Matter Information' as enclosed in Appendix A).

The Directors' Responsibilities

The Directors of ENRC Congo BV (the "Company") are responsible for the preparation and presentation of the Subject Matter Information as at 30 June 2025 in accordance with the criteria as set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (hereafter the "Criteria"). Furthermore this responsibility includes: designing, implementing and maintaining internal control relevant to the proper preparation and presentation of the Subject Matter Information that is free from material misstatement, whether due to fraud or error, and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.

Registered auditor's Responsibilities

Our responsibility is to express an independent opinion on the Subject Matter Information set forth in the accompanying ERG Metalkol self-assessment based on the work we have performed and the evidence we have obtained.

We conducted our work in accordance with International Standard on Assurance Engagements 3000 (*Revised*), *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information*. This standard requires that we comply with ethical requirements and that we plan and perform the engagement to obtain reasonable assurance as to whether the Subject Matter Information complies, in all material respects, with the Criteria.

A reasonable assurance engagement involves performing procedures we consider necessary to obtain sufficient appropriate evidence to support the expression of an opinion in the positive form whether the Subject Matter Information is prepared in accordance with the Criteria. The procedures selected depend on our professional judgement, including the assessment of the risks of material misstatement of the Subject Matter Information in accordance with the Criteria. The scope of our work comprised, amongst others, the procedures performed detailed in Appendix B.



Our Independence and Quality Management

We have complied with the independence and other ethical requirements in the International Ethics Standards Board for Accountants' (IESBA) International Code of Ethics for Professional Accountants together with the legal Belgian requirements in respect of the auditor independence, particularly in accordance with the rules set down in articles 12, 13, 14, 16, 20, 28 and 29 of the Our firm applies International Standard on Quality Management n°1, Quality Management for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance Related Services Engagements , and accordingly, maintains a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Inherent limitations

The scope of our work is limited to assurance over the Subject Matter Information. Our assurance does not extend to information in respect of earlier periods or to any other information included in the Subject Matter Information.

Opinion

In our opinion, the Subject Matter Information as at 30 June 2025 has been prepared, in all material respects, in accordance with the Criteria.

Other matter - Restriction on Use and Distribution of our Report

The accompanying Subject Matter Information has only been prepared for the purpose of demonstrating compliance with the Criteria and may not be suitable for another purpose.

Our independent assurance report is intended solely for the use of the Company to whom it is addressed, in connection with the Subject Matter Information as at 30 June 2025 and should not be used for any other purpose, and may not be provided to any third party without our prior written consent. We will not accept any responsibility or liability for damages to any third party to whom our report may be provided or into whose hands it may come. In this respect, we consent to our report, in full only, being shown to The Copper Mark, for the sole purpose of ENRC Congo BV demonstrating compliance with the Criteria, on the understanding that we will not accept any responsibility or liability for damages to any third party to whom our report may be provided or into whose hands it may come.




Diegem, 13 February 2026

PwC Bedrijfsrevisoren BV/PwC Reviseurs d'Entreprises
SRL Represented by

Wouter Coppens*
Bedrijfsrevisor/Réviseur d'entreprises

*Acting on behalf of
Wouter Coppens BV

DocuSigned by:

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Appendix A - Subject Matter Information

Appendix B - PwC's procedures performed



Appendix A - Subject Matter Information

Assessment Summary Report



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RESPONSIBLY PRODUCED MOLYBDENUM



RESPONSIBLY PRODUCED NICKEL



RESPONSIBLY PRODUCED ZINC

Participant Information	
Name of the site	La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol)
Unique identifier provided by the Copper Mark	ID P0117
Address	473, Boulevard Lumumba, Quartier Industriel, Commune de Manika, Ville de Kolwezi, Lualaba Province, DRC
Country of operation	Democratic Republic of the Congo
Name of brands produced at site and corresponding exchanges	La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol)

The Copper Mark Standards Included in the Assessment	
Criteria for Responsible Production / Risk Readiness Assessment	
Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc	

Conclusions		Criteria for Responsible Production	
1. Management Systems	PM	10. Responsible Supply Chains	PM
2. Risk Assessment	PM	11.No Child Labor	FM
3. Business Integrity	FM	12. No Forced Labor	FM
4. Revenue Transparency	FM	13. Freedom of Association and Collective Bargaining	FM
5. Legal Compliance	FM	14. Non-discrimination and Harassment	PM
6. Sustainability Reporting	FM	15. Diversity, Equity, and Inclusion	PM
7. Grievance Mechanism	FM	16. Employment Terms	FM
8. Stakeholder Engagement	FM	17. Occupational Health and Safety	PM
9. Mine Closure and Reclamation	PM	18. Emergency Preparedness	PM
		19. Community Health and Safety	PM
		20. Community Development	FM
		21. Artisanal and Small-Scale Mining	FM
		22. Security and Human Rights	FM
		23. Indigenous Peoples' Rights	NA
		24. Land Acquisition and Resettlement	FM
		25. Cultural Heritage	PM
		26. Climate Action	PM
		27. Greenhouse Gas Emissions Reductions	PM
		28. Water Stewardship	PM
		29. Waste Management	PM
		30. Circular Economy	PM
		31. Tailings Management	PM
		32. Biodiversity and Land Management	PM
		33. Pollution	FM

Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc			
1. Due Diligence Management System	FM	2. Risk Identification	FM
5. Public Reporting	FM	3. Risk Assessment	FM
		4. Risk Management	FM

Key	NA: not applicable	DNM: does not meet	PM: partially meets	FM: fully meets	NATA: not able to assess
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Statement of Conformance
 While the site "fully meets" certain criteria, others are assessed as "partially meets" with confidence that the continuous improvements in place will allow Metalkol to fully meet all applicable criteria by 12 September 2026.

Award(s)	Valid from	Valid until
The CopperMark	1-Jan-2026	1-Jan-2029

Scope of the assessment	
Principle covered metals	Copper Cobalt
Principle covered metal products	Copper Cathode Cobalt hydroxide
Other metals in scope	Other:
Metals in scope of minerals due diligence	Copper Cobalt
Operating activities	Mining Refining Other:
Infrastructure	Plant Other: Roads
About the participant	Metalkol is a world leader in the processing of legacy tailings mined by previous operators in the Kingamyambo Dam and the Musonoi Valley. Not only does Metalkol's operation help to restore the environment but also plays a key role in maintaining our position as one of the major copper and cobalt producers globally. Metalkol has the capacity to produce ~100ktpa of LME-grade copper cathode and ~23ktpa of high-quality cobalt in hydroxide. ERG owns 90% of Metalkol while the Government of the DRC 10%.

Equivalency
 Equivalent systems are determined by the Copper Mark to have standards and assurance requirements that are materially comparable in scope and intent to those of the Copper Mark, in accordance with the Copper Mark Recognition Process.

System	Date of certification / assurance	Review process	Covered Criteria
RMI	Annual assessment cycle with RMAP currently in progress yet Metalkol is considered conformant to the RMAP even if re assessment is in progress (delayed by the extension of the temporary suspension of cobalt export sourced from DRC).	Conformant to RMAP as indicated on the RMI's public list	Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc Criterion 10 - Part 2: Responsible minerals sourcing

Independent site assessment	
Name of lead assessor	Wouter Coppens
Name of assessment firm	PwC Bedrijfsrevisoren bv - PwC Reviseurs d'Entreprises srl (PwC)
Date(s) of assessment	14 July 2025 - 11 February 2026
Assessment period	30-Jun-25
Confirmation of advanced notice to stakeholders	Metalkol has informed the Copper Mark in advance of the independent site assessment by PwC to enable the Copper Mark to make an advance notice to stakeholders about the assessment.

Assessment Summary Report

Summary of assessment methodology

Metalkol has contracted with PwC to obtain an independent ISAE 3000 reasonable assurance on Metalkol's self-assessment (Subject Matter Information for assurance) against The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (Criteria for assurance). The engagement has been conducted in accordance with the ISAE 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (ISAE 3000).

In conducting a reasonable assurance engagement under ISAE 3000, the objectives of the PwC as the assurance provider is:

- To obtain reasonable assurance, as appropriate, about whether the Subject Matter Information has been prepared, in all material respects, in accordance with the Criteria;
- To express a conclusion regarding the outcome of Metalkol's self-evaluation of the underlying subject matter through a written report that conveys a reasonable assurance conclusion and describes the basis for the conclusion

A reasonable assurance engagement is where the assurance provider reduces the engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance provider's conclusion. The assurance provider's conclusion is expressed in a form that conveys the assurance provider's opinion on the outcome of Metalkol's self-evaluation against the Copper Mark Criteria.

In all cases when reasonable assurance cannot be obtained and a qualified conclusion in the assurance provider's assurance report is insufficient in the circumstances for purposes of reporting to the intended users, this ISAE requires that the practitioner disclaim a conclusion or withdraw (or resign) from the engagement, where withdrawal is possible under applicable law or regulation. This engagement did not warrant a qualified opinion or a withdraw as sufficient evidence was able to be obtained to give reasonable assurance on the Metalkol's self-assessment.

The engagement team involves the following team:

- PwC Engagement Partner - Overall responsibility for managing and achieving quality on the engagement and being sufficiently and appropriately involved throughout the engagement
- PwC Quality Review Partner - Reviews and discusses significant matters and significant judgments arising during the engagement
- PwC team of assurance specialists.

Metalkol understands that PwC identified and assessed the risks of material misstatement in the Metalkol's Subject Matter Information, considering the following components, although not all of these components will necessarily be present or significant for all subject matters:

- Inherent risk: The susceptibility of the subject matter information to a material misstatement before consideration of any related controls applied by the appropriate party(ies); and
- Control risk: The risk that a material misstatement that occurs in the Subject Matter Information will not be prevented, or detected and corrected, on a timely basis by the appropriate party(ies)'s internal control; and
- Detection risk: The risk that the practitioner does directly influence, which is the risk that the procedures performed by the practitioner will not detect a material misstatement.

Metalkol understands that the procedures are then designed and performed by the assurance provider to respond to the assessed risks and to obtain reasonable evidence to support the assurance conclusion. The assurance procedures that the assurance provider has performed is outlined in the section "PwC's procedures performed" for each of the 33 Criteria in this report.

Metalkol understands that the assurance provider has applied a risk-based sampling methodology, which involves identifying key risk areas and selecting samples that provide a representative view of the population and used statistical sampling techniques to ensure sufficient coverage and reliability. Sampling methods are aligned with the ISAE 3000 assurance standards and The Copper Mark Assurance Process v.5.1, June 2024. Testing procedures are designed on the risk assessment performed and based on the Criteria requirements. Metalkol understands that PwC has performed a total of 79 planned and random interviews with relevant stakeholders.

Assessment Summary Report

<p>Summary of assessment activities</p>	<p>Metalkol has contracted with PwC to obtain an independent ISAE 3000 reasonable assurance on Metalkol's self-assessment (Subject Matter Information for assurance+E923the Copper Mark self-assessment. The assurance provider prepared the PwC independent ISAE 3000 reasonable assurance report.</p> <ul style="list-style-type: none"> -Conducted a final closing meeting between ERG and ERG Metalkol's management on the assurance conclusion. -ERG shared the final ERG Metalkol self-assessment and draft PwC independent ISAE 3000 reasonable assurance report with the Copper Mark for the final review. -PwC performed the sign-off of the PwC independent ISAE 3000 reasonable assurance report. <p>Please refer to the PwC independent ISAE 3000 reasonable assurance report when reading this summary report and for the conclusion stated.</p> <p>Metalkol has contracted with PwC to obtain an independent ISAE 3000 reasonable assurance on Metalkol's self-assessment (Subject Matter Information for assurance) against The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (Criteria for assurance). ISAE 3000 requires planning and execute procedures to obtain reasonable assurance regarding whether the selected indicators are free from material misstatement.</p> <p>The following activities were performed as part of the assessment:</p> <p>1. Planning</p> <ul style="list-style-type: none"> -Held a Kick-Off Meeting between ERG corporate management and PwC to plan the assurance engagement. -Metalkol and ERG group management performed the self-assessment to evaluate Metalkol's performance rating for all 33 Copper Mark Criteria. -The self-assessment has been discussed between Metalkol and the assurance provider to provide a clear overview of the self-assessment results, gaps towards fully meeting the Criteria as well the underlying supportive evidence. -The assurance provider obtained and reviewed Metalkol's self-assessment against the Criteria for all 33 Copper Mark Criteria. -The assurance provider performed the risk assessment on Metalkol's self-assessment and conducted meetings with ERG management to inquire, among others, about Metalkol's operational context, underlying evidence, management system practices in place to evaluate the audit risks. -The assurance provided defined for each of the 33 Copper Mark Criteria the assurance procedures to be performed, based on the risk assessment, which has been formalized in an assurance plan. This involved, among others to perform a visit to Metalkol and the surrounding communities, to perform management meetings, inspect key policies, procedures and processes, and to perform stakeholder interviews with management, employees, contractors, community representatives, authorities, NGOs, and academia. A detailed overview of the assurance procedures performed by the assurance provider is outlined in the section "PwC's procedures performed" for each of the 33 Criteria in this report. -The assurance plan has been shared with the Copper Mark for the review and validation. <p>2. Execution</p> <ul style="list-style-type: none"> -The assurance provider examined supporting evidence for Metalkol self-assessment in form of form of assurance evidence, such as, policies, procedures, data extracts, and other relevant evidence. -The assurance provider performed a site visit to ERG Metalkol which included: <ul style="list-style-type: none"> oKick-Off Meeting with ERG Metalkol's management oConducted walkthrough interviews with ERG Metalkol's management to obtain an understanding of the existing management practices for each of the 33 Criteria, oPerformed a plant tour to inspect the overall business activities and implementation of management practices, oPerformed a community tour to inspect ERG Metalkol's management practices and impact on surrounding communities in and around the concession area.
<p>Assurance report</p>	<p>The assurance report can be accessed in the "Further Information" section on the Copper Mark website participating sites for La Compagnie de Traitement des Rejets de Kingamyambo S.A (Metalkol S.A).</p>

Summary of findings on Metalkol's Self Assessment

Criteria	Subject Matter	Metalkol's Description of System	Identified gaps (where appropriate)	Procedures performed by the Assessment Firm
<p>1. Management System</p> <p>Implement a corporate or site-level management system for the effective prevention, mitigation and remedy of risks and impacts related to environment, social, and governance (ESG) issues.</p>	<p>PM</p>	<p>At Metalkol we believe that all injuries and occupational illnesses are preventable, that protecting and sustaining the environment and having controlled open communication with the community and other stakeholders is part of our normal business conduct. Metalkol is committed to high standards and leadership to achieve Metalkol's vision of Zero Harm. We have adopted a structured and systematic approach to the management of Safety, Health, Environment and Community (SHEC) issues.</p> <p>The implementation and maintenance of the SHEC Management System (MS) provides the means to manage and minimise risks, as well as legal compliance, as our procedures are updated if any changes in law occur. 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 presently in the process of certification.</p> <p>One of Metalkol's most important values is conducting business with the greatest care for the health and safety of our employees, our partners, contractors and customers' personnel, the environment and the people in the communities we work in. Metalkol aspires to achieve a Zero Harm work environment which is viewed as being integral to the way we do business. As a foundation for this value, Metalkol SHEC Policy is reviewed periodically by the Management Committee to ensure it meets ERG Group SHEC SHS aspirations, as well as with its stakeholders in accordance with approved consultation mechanisms.</p> <p>The Metalkol COO endorses the SHEC Policy by ensuring that:</p> <ul style="list-style-type: none"> • The Policy is internally communicated and made externally available to stakeholders; • The Policy is an integral aspect of setting operational objectives and targets through ESG-related Key Performance Indicators and the development of Continuous Improvement measures. <p>ERG's governance system, which includes Metalkol, is defined at three levels. The established quarterly 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 who report to ERG's Board. At the regional level, the sites' SHEC performance and risk register are reviewed on a bi-monthly basis by the cross-functional ESG-Human Rights Working Group (ESG-HR Working Group) which is chaired by Metalkol COO. Finally, SHEC risks and mitigation measures are also discussed with the COO and other departments on a daily basis at Metalkol when required. Metalkol's management systems updates are reported annually through ERG Group's Sustainable Development Report, the annual ERG Africa's DRC Integrated Annual Report, and the site-specific report submitted to the DRC authorities.</p> <p>Our commitments towards governance and integrity standards are set out in the ERG Code of Conduct and embedded into everything we do. The Code of Conduct sets out our standards and policies on key legal and ethical matters, and is binding on the Board of Managers, ERG employees, officers and directors, and ERG's counterparties (for further information refer to Criterion 3).</p> <p>Metalkol remediates impacts and risks through its management practices, which includes stakeholder participation, including grievance mechanisms and stakeholder engagement. During the remediation process, Metalkol involves the relevant department (if applicable) and the relevant stakeholder to ascertain the facts, to establish the responsibilities, and to determine the most adequate remediation measure. In addition, when any operational changes occur, and at least every 5 years, Metalkol conducts an update of the Environmental and Social Impact Assessments, which is performed by third party experts and includes public consultations with key stakeholders to identify and evaluate the</p>	<p>ISO 45001:2018 and ISO 14001:2015 certification ongoing.</p> <p>Improving the delivery and tracking of training to all employees and other stakeholders as applicable.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected the Company's commitments that are communicated via key policies, website, public reporting, intranet, trainings, and posters on site. -Inspected the Company's management systems and alignment with the risk classification for all relevant Copper Mark criteria. -Inspected policies, procedures, and processes to obtain an understanding of the design of the management system. -Performed sample testing procedures on the implementation practices of the management system. -Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected reporting to public authorities and external stakeholders, including the Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group Sustainable Development Report. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. -Inquired about the management practices related to the training of relevant stakeholders across the relevant 33 Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Regarding the management practices across all 33 Copper Mark Criteria, engaged with a total of 79 people through in person and remote interviews, including with management, employees, union representatives, contractors, suppliers, community members, NGOs, authorities, and academia. -Conducted interviews with Metalkol and ERG corporate group management representatives to confirm their understanding and awareness of the commitments and how they are implemented through the Company's management systems and related policies, procedures and processes, as well as the ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Conducted a plant and community tour to inspect that management practices are effectively implemented and communicated to ensure the awareness and understanding of stakeholders. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in</p>
<p>2. Risk Assessment</p> <p>Conduct a risk assessment for the identification and prioritization of environmental, social and governance (ESG) issues.</p>	<p>PM</p>	<p>The ERG Group risk management system helps us to identify and understand potential threats to the sustainability of our business, as well as related opportunities. This includes our most material ESG and sustainable development 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 risk.</p> <p>While our Group-wide Compliance Model enables us to apply advanced risk mitigation measures as part of the company's Enterprise Risk Management, all other risks related specifically to Metalkol, such as social and environmental ones, are managed through the ESG-Human Rights Working Group. As part of the risk prioritization process of ESG issues, risks and impacts are being assessed to determine their saliency based on the severity (i.e. scale, scope, irremediability) and likelihood. An important input into the risk prioritization process are the insights collected by Metalkol through the stakeholder engagement process and grievance mechanism. The decision on what score to allocate any given risk is taken by the Head of Department based on internal/external consultations and evidence-based analysis. This is then reviewed and validated by the ESG-Human Rights Working Group and the Enterprise Risk Management.</p> <p>Internally at Metalkol, for each identified and assessed risk, the site has developed a risk register with mitigation plans with corresponding responsibilities, timelines and milestones. The mitigation plans are developed, overseen and implemented by the relevant company departments. The relevant departments report their progress through the ESG-Human Rights Working Group (ESG-HRWG) meetings, which tracks the implementation of the mitigation plans on site and drives the revision of management systems when necessary. For broader regional risks, particularly those related to governance, the risk management process is done through the group enterprise risk process. In addition and based on the Group risk management system and the regional Risk Management System Procedure, ERG Africa prepares risk reports on a quarterly basis for regional- and Group level management. The Group principal risks are then set out in the ERG Group's Sustainable Development Report.</p> <p>At the site-level, in the publicly available Metalkol's Clean Cobalt and Copper Performance Report 2025, we describe our supply chain due diligence and our operational risk management systems during the assessment period 1 May 2024 to 31 July 2025, including risk assessment and mitigation, as well as opportunity enhancement. These are part of the Metalkol SHEC Management System and include seven goals, namely:</p> <ol style="list-style-type: none"> 1. Compliance with the OECD Due Diligence Guidance 2. Clean cobalt and copper is sourced without child labour 3. Clean cobalt and copper is traceable 4. No cobalt or copper is sourced from artisanal and small-scale mining 5. Restoring the environment 6. Collaborating to promote community sustainable development 7. Leading our industry towards more sustainable cobalt value chains <p>Prior to committing to the Copper Mark assurance process, our performance reports have been a key tool to disclose our approach and performance across areas of due diligence. All statements in these reports are third-party assured at site. We include corrective actions identified during both second-party and third-party audits, incl. our official Environmental and Social Impact Assessments (ESIAs), and our progress in the reporting period, as well as concerns raised by external stakeholders and our responses. A</p>	<p>For some of the ESG issues that have been prioritised, Metalkol does not have action plans.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's risk and impact assessments conclusions and relevant underlying documentation of the risk assessment methodology, risk assessment documentation and meeting minutes, which included the ERG Compliance Risk Management Procedure, ERG Enterprise Risk Management Assessment, the ERG Double Materiality Assessment as well as the Metalkol ESG & Human Rights Risk Assessment and the Metalkol Environmental and Social Impact Assessment (ESIA). -Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. -Inspected for each Copper Mark-relevant risks, the defined management practices and action plans that the risk & impact assessments have defined to mitigate the identified risks, such as through the inspection of the SHEC Management System and the governance and integrity management systems. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected meeting minutes and presentations demonstrating how Metalkol engages with stakeholders on identified risks and how resulting input contribute to the development of the related action plans. -Inspected Metalkol's public reporting on its risk management systems through the Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group's Sustainable Development Report as well as websites. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:201. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of the risk assessment methodology, risk assessment conclusions and reporting processes with regards to Metalkol. -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant and community tour Metalkol's operations and engagement with communities to obtain an understanding of the risks and impacts as identified and assessed in Metalkol's risks and impacts assessments and to implement appropriate actions. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>

Assessment Summary Report

<p>3. Business Integrity</p> <p>Implement high standards of business integrity through the prohibition and effective prevention of bribery, money laundering, and anti-competitive behavior.</p>	<p>FM</p>	<p>One of ERG fundamental commitments is to live up to the highest standards of business integrity and professionalism, hence integrity is one of the Group's sustainable development principles. Our commitments towards integrity standards are set out in the ERG Code of Conduct and embedded into everything we do. The Code of Conduct 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.</p> <p>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 Metalkol's broader interactions with society include, but are not limited to:</p> <ul style="list-style-type: none"> • Anti-bribery and Corruption Policy: This commits us to always acting responsibly, honestly and with integrity, and to not engaging in or tolerating any form of bribery or corruption • Agents Compliance Policy: This requires agents acting on our behalf to comply with applicable laws and regulations, as well as our policies and Code of Conduct • Anti-Money Laundering Policy: This commits us to not knowingly engaging in transactions involving money laundering or terrorism financing • Human Rights Policy: This requires ERG and its employees and contractors to abide by human rights norms • Anti-trust and Competition Compliance Policy: This commits us to not engaging in or tolerating any form of conduct that fails to comply with applicable competition laws • CSR Projects and Sponsorship Policy: This sets out the process, criteria and approvals necessary for ERG to commit to and manage CSR projects or sponsorship arrangements • International Economic Sanctions Compliance Policy: This commits us to avoiding breaching international economic sanctions imposed by relevant governments, as well as supranational or international organisations • Personal Data Protection Policy: This commits us to complying with all data protection and privacy legislation and regulations applicable to the jurisdictions in which we operate • Group Tax Policy: This sets out our commitments with respect to our approach to tax compliance <p>The site/regional Compliance Team reports to the Group Head of Compliance who in turn reports to the Board's Compliance Committee. As such, our integrity efforts are driven by the Board's Compliance Committee, which is responsible for:</p> <ul style="list-style-type: none"> • Oversight and approval of our Group Compliance Programme, policies, systems and controls • Monitoring the effectiveness of our Compliance function <p>The key elements of our risk-based Group Compliance management system which are applied to Metalkol include risk identification and management, counterparty due diligence, training to employees and contractors on the company's Code of Conduct and relevant policies, monitoring and reporting. In addition, Metalkol 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 and community stakeholders. 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. This serves as a grievance and whistleblower mechanism to alert the Group of any risk or incidence of bribery, money laundering and anti-competitive behavior.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitments related to business integrity by inspecting key policies, among others the ERG Code of Conduct, Anti-Bribery and Corruption Policy, Agents Compliance Policy, Anti-Money Laundering Policy, Human Rights Policy, Anti-Trust and Competition Compliance Policy, CSR Projects and Sponsorship Policy, International Economic Sanctions Policy, Personal Data Protection Policy, Group Tax Policy, Supplier Code of Conduct, as well as the related processes and procedures in place to implement these policies. -Inspected ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues and risks related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected Metalkol's public reporting on these commitments through the DRC EITI reporting, Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report, and the ERG Group's Sustainable Development Report as well as websites. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. -Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of business integrity commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with employees and contractors to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant tour how business integrity commitments are communicated to employees, contractors, visitors such as for instance through posters at key locations at the central entrance, offices and lunch facilities. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
<p>4. Revenue Transparency</p> <p>Demonstrate corporate transparency and accountability through the public disclosure of all material payments to governments of taxes, royalties, signature bonuses, and all other forms of payments or benefits and support the Extractive Industries Transparency Initiative (EITI)</p>	<p>FM</p>	<p>Our senior management is kept informed of key risk areas on a frequent basis and the most material ones are publicly reported within our ERG Group's Sustainable Development in line with our Group 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) reports. In the DRC, and as per the Ministry of Mines schedule, Metalkol is currently working on the most recent report (2023), contributing to the DRC's "meaningful progress" status within the EITI framework.</p> <p>The company has also appointed auditors as per the Organisation for the Harmonisation of Business Law (OHADA) in Africa requirements. As such, Metalkol is audited by its direct auditors (OHADA) as well as through its parent company auditors based on the International Financial Reporting Standards (IFRS).</p> <p>Furthermore, we file the following with the Luxembourg authorities:</p> <ul style="list-style-type: none"> - Report on Payments to Governments under the EU Accounting Directive (2013/34/EU)2 - OECD Country-by-Country Report under OECD BEPS Action 13 	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitments to providing revenue transparency, as outlined in key policies among other the ERG Tax Policy and the Group Accounting Manual. -Inspected Metalkol's public reporting on these commitments through the Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group Sustainable Development Report as well as websites. -Inspected ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Inspected the revenue transparency reporting through the DRC EITI reporting (i.e. inspected the most recent published 2022 EITI reporting and Metalkol's most recent 2023 reporting to the EITI) as well as the underlying documentation at Metalkol, such as the publicly available ERG audited financial statements according to the IFRS standards and the Metalkol audited financial statements according to OHADA standards. -Inspected ERG's reporting on Payments to Governments under the EU Accounting Directive (2013/34/EU) and OECD Country-by-Country Report under OECD BEPS Action 13 to the Luxembourg authorities. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management to obtain a clear understanding of the revenue transparency obligations and management system in place related to the providing revenue transparency through the EITI reporting and through the EU Accounting Directive.
<p>5. Legal Compliance</p> <p>Implement high standards of business conduct through compliance with applicable national regulatory requirements, applicable cross-jurisdictional obligations and international law.</p>	<p>FM</p>	<p>The Legal function in ERG is composed of qualified lawyers and practitioners from various jurisdictions. Each monitors the regulations and their applicability on Metalkol's activities (if any). National and international laws are integrated as part of policies' development/review.</p> <p>To stay abreast with the latest legal and regulatory developments in the DRC, Metalkol monitors applicable laws and updates its Regulatory Matrix. Whenever a new obligation is identified, the latter is included into the Matrix.</p> <p>The Regulatory Matrix is reviewed bi-monthly by the cross-functional ESG-HR WG and assesses the status of compliance for each of the identified obligations. The site legal team regularly monitors legal implications of the Site's activities and includes regulatory requirements in the workflows. Whenever required, the site legal team is also accountable for following up with each relevant department (environment, tax, finance, HR, etc.) to ensure compliance with legal obligations. Quarterly reports on the sites' status of legal registers are provided through the Sustainability Committee.</p> <p>In addition, we have a variety of grievance mechanisms through which rights holders (and other stakeholders) can report legal issues, including our:</p> <ul style="list-style-type: none"> • Confidential, independently managed whistleblowing ERG Hotline • Standard human resources channels • Community engagement processes • Site-based grievance mechanisms 	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's legal management system, through policies, procedures and processes that are in place to govern legal compliance including identification and tracking of relevant legal requirements, -Inspected the legal register used as regulatory matrix and reporting practices to management of how Metalkol's management is being informed about changes to the legal obligations. -Inspected ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. -Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. -Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 14001:2015. -Inspected Metalkol's plans and actions to ensure compliance with regulatory requirements by reviewing documentation exhibiting Metalkol's reporting to the regulatory authorities, as well as regulatory inspections and audits undertaken. -Assessed the grievance mechanism management system in place against the UN Guiding Principle 31 requirements. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance.
<p>6. Sustainability Reporting</p> <p>Enable corporate transparency and accountability and promote informed decision-making through the publication of annual reports on material, environmental, social and governance ESG issues.</p>	<p>FM</p>	<p>ERG Group's Sustainable Development Report is prepared with reference to the GRI Standards and is focused on our most material Sustainable Development issues (all available at https://www.eurasianresources.lu/en/pages/sustainable-development/sustainable-development-reports). In 2025, the Group has finalized its third-party gap assessment against the EU Corporate Sustainability Reporting Directive (CSRD) and is currently working towards compliance.</p> <p>Our ERG Group's Sustainable Development Report materiality assessment process includes:</p> <ul style="list-style-type: none"> -Desk-based analysis: the prioritization of issues using internal and external documentation/ stakeholders' engagement and third-party analysis. The application of score-based prioritization using the 'double materiality' criteria set out opposite -Internal engagement: engagement with executives, managers and specialists across the Group to verify / adjust the results -Validation and finalisation: internal review and validation of the results, which inform our reporting and broader management approach -Reporting: mapping of the results against the GRI Standards and CSRD topics to determine how issues should be reported on now and in future. Public reporting against our material issues. <p>In November 2024, at ERG Africa, we have conducted a 3rd party double materiality survey.</p> <p>Our public reporting includes the previous third-party assured Metalkol's Clean Cobalt and Copper Performance Reports, as well as the 2025 Metalkol's Clean Cobalt and Copper Performance Report covering the Copper Mark reporting period. Since 2023, we also started reporting through our ERG Africa's DRC Integrated Annual Report and the specific Metalkol report required by the DRC Government, the Metalkol Activity Data Summary report ("Synthèse des données d'activité"), which collate all information required to comply with the DRC disclosure obligations such as:</p> <ul style="list-style-type: none"> -Our mining methodologies and progresses made against the rehabilitation plan -Our financial statements against the due payments as per the OHADA audits and EITI reporting -Our annual environmental and social performance report against the official Environmental and Social Impact Assessment (ESIA) -The summaries of environmental monitoring data -Our Health & Safety performance 	<p>Interviews conducted:</p> <ul style="list-style-type: none"> -To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures: <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected ERG group and Metalkol's public reporting to assess the reported disclosures and alignment with international standards through the Metalkol Activity Data Summary established as per DRC's disclosure obligations, Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group Sustainable Development Report established as per the GRI standards as well as websites. -Inspected Metalkol's Annual environmental and social performance report against the official Environmental and Social Impact Assessment (ESIA). -Inspected Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues are identified. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives to obtain an understanding on the reporting processes in place and how Metalkol collects, measures, analyses and communicates information on key material ESG issues. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>

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<p>7. Grievance Mechanism</p> <p>Respect the rights of adversely affected stakeholders' access to remedy, through the implementation or participation in an operational-level grievance mechanism aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs).</p>	<p>FM</p>	<p>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 and community stakeholders. 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 manned 24 hours a day, seven days a week by an independent company. In addition to the above, the Group ERG Hotline enables all employees and third parties to report violations. The ERG Hotline is operated by an independent operator and allows anonymous reporting. The ERG Code of Conduct prohibits retaliation against people who report violations in good faith.</p> <p>Grievances are managed according to our Grievance Management Procedure which is informed by the International Finance Corporation (IFC) Performance Standards and the UN Guiding Principles on Business and Human Rights. We use the Isclmetrix software to help record, centralise and analyse SHS 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. We also receive regular visits by applicable regulators, and our Community Liaison Officers perform regular visits within our hosting communities to collect feedback and recommendations.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected the grievance mechanism management system through inspecting the policies, procedures and processes in place including the Grievance Mechanism Procedure and the underlying documentation of the grievance register, inspecting how access to stakeholders is provided offering anonymity and non-retaliatory responses to grievances. -Performed testing procedures for a sample of grievances to inspect how grievances have been addressed and mitigated in accordance with Metalkol's policies and procedures -Inspected training materials to evidence how Metalkol communicates and instructs employees and contractors on the use of the grievance mechanism. -Performed detailed testing on a sample of 16 employee training records to verify the occurrence of trainings. -Inspected meeting minutes and public displays to evidence site's engagement with relevant stakeholders (such as the regular visits by the Community Liaison Officers), including community members and employees on grievances and the use of the grievance mechanism. -Assessed the grievance mechanism management system in place from a design and effectiveness perspective against the UN Guiding Principle 31 requirements for the mechanism to be sufficiently legitimate, accessible, predictable, equitable, transparent, rights compatible and a source of continuous learning and based on an engagement and dialogue with stakeholders. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance, in line with the Metalkol grievance mechanism management system. -Inspected the online ERG Integrity Line to ensure public access of the grievance mechanism to all stakeholders <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of grievance management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes and how grievance work as source of continuous learning to improve management practices. -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations to obtain an understanding of the effectiveness of the grievance mechanism in terms of the legitimacy of the grievance mechanisms, the equity, accessibility and predictability of the process as well as the process to transparently report on the grievance addressed.
<p>8. Stakeholder Engagement</p> <p>Enable stakeholders' early and continued participation in decisions that affect their health, well-being, safety, livelihoods, communities, and environment, through the implementation of an inclusive and meaningful engagement process.</p>	<p>FM</p>	<p>As part of the Metalkol Safety, Health and Sustainability Management System, the site follows the Stakeholder Engagement Procedure which is based on early and ongoing engagement, and two-way communication between the company and its stakeholders. This Procedure defines the purpose, scope, requirements and roles and responsibilities for our engagement with key stakeholders and is applicable to all our employees and contractors. The Stakeholder Engagement Plan has a specific focus on marginalized and vulnerable groups. For these groups, specific engagements are designed to facilitate access to information, decision-making and benefits-sharing throughout the CSR projects.</p> <p>While the Mapping and the Plan structure our engagement with local stakeholders (incl. civil societies, government, etc.) based on their priorities, these documents also provide the basis for Metalkol's community relations approach and priorities, it also complements and reinforces our Grievance Mechanism system and vice-versa.</p> <p>All our engagements result in written minutes which are agreed upon and signed with all the involved stakeholders. Metalkol ensures that the minutes are explained to affected stakeholders in a format and language readily understandable to the local population and workforce.</p> <p>Lastly, we publicly disclose how ERG Africa engages with its relevant stakeholders on potential and actual impacts through our annual ERG Africa's DRC Integrated Annual Report, and the 2025 Metalkol's Clean Cobalt and Copper Performance Report demonstrates in more detail the value created throughout our proactive engagements.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected the stakeholder engagement management system to obtain an understanding of the policies, procedures, and processes in place to engage with key stakeholders. -Inspected the Metalkol Environmental and Social Impact Assessment and stakeholder mapping which identified the key stakeholders, risks, impacts and areas of influence and further inspected the ERG Double Materiality Assessment, the ERG Enterprise Risk Management Assessment and the Metalkol ESG and Human Rights risk assessment to obtain an understanding of the risks and impacts related to stakeholders. -Inspected the stakeholder engagement plan and inspected underlying documentation of the inclusive engagement activities with stakeholders on the relevant risks and impacts, including the related public disclosures. -Inspected meeting minutes and presentations demonstrating how Metalkol engages with stakeholders on identified risks and how resulting input contribute to the development of the related action plans. -Inspected key reports and documentation demonstrating how Metalkol addresses the reporting expectations of relevant local authorities. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report, ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over stakeholder engagement. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of stakeholder engagement commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with employees, contractors and 10 community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. -Conducted interviews with key stakeholders, including with NGOs, authorities and academia to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p>
<p>9. Mine Closure and Reclamation</p> <p>Ensure the long-term environmental, economic and social stability of mining communities through the implementation of a system to manage and monitor mine closure and reclamation, and the allocation of financial provisions for mining reclamation, closure, and post-closure activities.</p>	<p>PM</p>	<p>To commence preparation for rehabilitation, and as part of the ESIA and approval official process, Metalkol developed a Closure Plan which is 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.</p> <p>On the basis of the 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 up-stream mining operations, resulting in a similar pre-dredging condition of the river, making complete reinstatement and rehabilitation of the river futile. Therefore, Metalkol shall start with its progressive rehabilitation 1-2 years before closure (scheduled in 2032).</p> <p>It should be noted that a significant amount of tailings will already be recovered in the Musonoi and Kingamyambo areas, which will effectively lead to the rehabilitation of large areas of land and water resources. The proposed rehabilitation measures will include the following:</p> <ul style="list-style-type: none"> + The vegetation of Kingamyambo and the Musonoi River (note that Metalkol SA is undertaking a gradual rehabilitation throughout the life of the mine. The zones will be rehabilitated as the residues are extracted and the zones are cleared.) + Dismantling of surface infrastructure (buildings, pipelines, power lines, etc.) and encourage materials 2nd life through community projects; + Vegetation of the Kingamyambo Tailing Dam and the Musonoi River; + Post-closure environmental monitoring and inspection; and + Implementation of the Community Commitment Register (Cahier des Charges) which includes alternative livelihood entrepreneurship projects <p>In the spirit of gradual rehabilitation throughout the life of the mine, we are collaborating with the University of Lubumbashi in developing a nursery to identify species tolerant to tailings "pollution" as described in the ESIA, which will assist with the rehabilitation process and development of a biodiversity monitoring programme. In addition, during the construction phase, the arable layer has been stripped and stored for future rehabilitation of the mine site.</p> <p>In addition, a Top Soil Management Plan is in place to enable future rehabilitation based on the third party proposed closure plan. We also have a land clearance procedure in place to manage unnecessary clearing of land. Last but not least, all the required environmental rehabilitation provisions as stated with our ESIA have been paid to the DRC government.</p>	<p>Metalkol Mine Closure Plan does currently not yet foresee scenarios for temporary / sudden closure.</p> <p>Metalkol does currently not perform continuous engagement with stakeholders related to mine closure activities and has currently not fully assessed specific opportunities creating post-closure benefits for affected stakeholders (e.g. in terms of economic situation and employment).</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected the mine closure and reclamation management practices by inspecting the mine closure plan and reclamation, as well as the rehabilitation procedures and processes and underlying documentation in place, including an inspection of the impact on other relevant aspects, such as among others biodiversity, water management, tailings storage, community engagement. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements related to mine closure and reclamation. Inspected the financial provisions and payment of related bonds made for the foreseen mine closure activities determined based on the preliminary rehabilitation and closure associated costs. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over mine closure and reclamation. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of mine closure and reclamation commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including academia, to obtain an understanding of the mine closure and reclamation activities, including rehabilitation, performed by Metalkol. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant and community tour relevant locations to the mine closure and reclamation process, including the tailings Residue Storage Facility, and inspected the ongoing rehabilitation practices performed. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in</p>

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<p>10. Responsible Supply Chains</p> <p>Respect regulatory requirements and promote responsible business conduct in supply chains through the implementation of corporate or site-level, comprehensive, integrated, iterative, and risk-based due diligence.</p>	<p>PM</p>	<p>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 I 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.</p> <p>Part I – Embed responsible business conduct into supply chain due diligence policy and management systems</p> <p>All suppliers are required, as a condition of doing business with Metalkol, to adhere to the ERG Supplier Code of Conduct and to ensure compliance of their subcontractors, if any. ERG Supplier Code of Conduct abides by international standards covering issues such as Health & Safety, Environmental Stewardship, Integrity, Fair Employment Practices, Human Rights, Chain of Custody rules among other topics.</p> <p>The Supplier Code of Conduct is publicly available and communicated internally and externally proactively as part of our Third-Party Risk Management (TPRM) programme. In addition, our compliance managers conduct Counterparty Due Diligence (CPDD) assessments using reputable third-party information and compliance databases. This is with the aim of identifying ESG risks relating to (among other things) sanctions, money laundering, CAHRAs and human rights, as well as bribery and corruption. The process generates risk ratings for each transaction and third party and supports the identification of appropriate mitigation actions.</p> <p>ERG commits to monitoring the compliance of its business partners and takes immediate and thorough remedial steps in cases where the ethical performance of its business partners comes into question. Suppliers are required to keep records of all relevant documentations proving adhesion to the Supplier Code of Conduct and for those failing to remedy any violations, their contracts and future relationship with ERG is reviewed, which could result in the termination of contracts.</p> <p>In addition, in February 2025, ERG Africa improved its Procurement management system with emphasis on creating functional ownership of the procurement process necessary to drive realization of shareholder value through commercially effective supplier agreements and corporate governance, while complying with the highest sustainability standards. The revised Standard Operating Procedure (SOP) is applied with consideration of applicable laws and regulations in the countries that ERG Africa operates in, the ERG Code of Conduct, ERG Suppliers Code of Conduct, ERG Antibribery and Corruption Policy, ERG Anti-Money Laundering Policy, ERG Human Rights Policy, and other relevant policies.</p> <p>The new ERG Africa Procurement Management System reinforces the role of the Safety, Health and Sustainability (SHS) team which needs to ensure that all employees and contractors always adhere to ERG's SHEG procedures. The SOP also includes stronger governance, human rights and local content considerations as guiding principles to the procurement process.</p> <p>At Metalkol, to apply the new SOP, the sourcing process includes a cross-functional team to guide the identification of the main sustainability-related mitigation measures required for each contractor/ commodities category. Mainly, these measures include considerations towards Ethical Business, Human Rights, Health & Safety, Decarbonization, Water and Air quality management, Biodiversity and Environmental Hazards guided by the approved Metalkol ESIA.</p> <p>Internal audits ensure proactive compliance with business processes and general corporate governance, including sustainability considerations. Suppliers/ Contractors training on ERG Code of Conduct, Supplier Code of Conduct and Human Rights Policy contain explicit prohibitions on forced labour and child labour and require business partners to have in place processes to verify the age of employees and new applicants. Therefore, child labour (both at the site level and in the value chain) is specifically and continuously assessed through the company's risk assessment process.</p> <p>Through community investment projects, Metalkol invests in child labour prevention and also manages the risk of child labour through its ASM Management Plan and Chain of Custody Procedure, ensuring that its product only comes from the site operations.</p> <p>Internally, Metalkol has established processes and controls aimed at ensuring all of its workforce (including contractors) are above 18 years old and have a valid labour contract. Metalkol policies, including its Recruitment and Selection Policy, do not permit employees or workers of its 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. Metalkol, or its contractors, will keep a record of all IDs and proof of age. Security personnel are made aware of the Group zero tolerance of child labour and keep patrol schedules and logs. The Labour Inspector of the DRC government verifies compliance with DRC Labour Regulation during their site inspections.</p>	<p>Metalkol's supplier audits to be strengthened by integrating key sustainability-related KPIs into all supplier audits and process to be enhanced with clear follow-up on supplier audit conclusions and action points.</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected the responsible supply chain management systems in place related to the raw material sourcing as well as business partner management through the inspection of policies, procedures and processes in place (e.g. Counter Party Due Diligence Policy (CPDD), Supplier Code of Conduct, Procurement Policy). -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected through the Cobalt and Copper Chain of Custody Procedure, the material flow from extraction, processing, and shipping to obtain and understanding of the chain of custody management practices. -Inspected for a sample of 16 business partner records how Metalkol performs counterparty due diligence and supplier audits as part of Metalkol's internal auditing practices. -Inspected Metalkol's RMI RMAP assessment report and certification, ERG's CAHRA procedure and assessment to obtain an understanding how Metalkol assesses and accounts for the risks related to its raw material sourcing as located in a CAHRA country. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over responsible supply chain management. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of supply chain and due diligence commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant tour the process and control measured for the extraction, processing, and shipping of the raw materials.
<p>11. No Child Labor</p> <p>Prohibit, prevent and remedy the employment of children below the age of 15, and ensure that young workers below the age of 18 are not exposed to the worst forms of child labor, including hazardous work.</p>	<p>FM</p>	<p>Where necessary, or whenever a grievance is received, Metalkol implements additional procedures and / or targeted action plans to further remove the risks of forced labour and child labour in its supply chain. These include detailed reviews of supplier labour practices during audits and the review of these processes and systems by independent assurance providers. Labour brokers are also subject to detailed annual audits.</p> <p>Progresses and results in relation to child labour are annually reported through ERG Sustainable Development Report, the ERG Africa's DRC Integrated Annual Report, as well as 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitment as publicly communicated through public reporting and policies, such as the Code of Conduct, Human Rights Policy, and Supplier Code of Conduct. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, and UNGP principles. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected the management practices by inspecting policies, procedures and processes measures in place, such as through the recruitment and HR onboarding procedures as well as the access controls measures at site prohibiting the employment of those under 18 years old. -Inspected and performed sample testing of 16 HR records and underlying supportive evidence to confirm appropriate documentation is kept in view of key employee data. -Inspected and performed sample testing of 16 supplier signed confirmations to adopt ERG's Supplier Code of Conduct to validate their commitment to Metalkol's key policies as well as the testing of relevant underlying documentation that demonstrate the prohibition of employment of those under 18 years old (such as among others through contracts, ID). -Inspected a sample of 16 business partner records of how Metalkol performs counterparty due diligence and supplier audits as part of Metalkol's internal auditing practices, such as related to Labour Brokers, including the testing of employment records that demonstrate the terms and conditions of prohibiting the employment of those under 18 years old. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected management practices in place to address the risk of child labour among business partners and in the community, by inspecting underlying documentation of supplier audits and community engagement programs. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over child labour as well as inspecting Metalkol's RMI RMAP assessment report. -Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated.
<p>12. No Forced Labor</p> <p>Prohibit, prevent and remedy forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of person and adhere to international principles of responsible recruitment.</p>	<p>FM</p>	<p>ERG Code of Conduct, ERG Supplier Code of Conduct and Human Rights Policy contain explicit prohibitions on forced labour and are applicable to all ERG's entities. Therefore, forced labour (both at the site level and in the value chain) is specifically and continuously assessed through the company's risk assessment process.</p> <p>Metalkol's action plan is in place to prevent and mitigate risks of forced labour including sites' training and awareness. These requirements are integrated within the Human Resources Policy and management systems.</p> <p>Human rights risks and compliance with the Human Rights Policy, which includes forced labour prohibition, forms part of the quarterly reporting to the ERG Board of Managers and which is informed by the regional Sustainability Committee. At Metalkol, internal audits are periodically reviewing compliance with this Policy and report any deficiencies and respective recommendations to the Management and the Board. Where necessary, or whenever a grievance is received as an alert to increased risk of forced labour, the site implements additional procedures and / or targeted action plans to further remove the risks of forced labour in its supply chain.</p> <p>Metalkol's zero tolerance of forced labour in its operations or through its supply chain is demonstrated throughout its 2025 Metalkol Clean Cobalt & Copper Performance Report and RMI certification. In addition, Metalkol is being inspected by the Ministry of Labor annually.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitment as publicly communicated through public reporting and policies, such as the Code of Conduct, Human Rights Policy, and Supplier Code of Conduct. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, and UNGP principles. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected the management practices by inspecting policies, procedures and processes in place, such as through the recruitment and HR onboarding procedures as well as internal auditing procedures. -Inspected management practices in place to address the risk of forced labour among business partners by inspecting underlying documentation of supplier audits. -Inspected and performed sample testing of 16 HR records and underlying supportive evidence to confirm appropriate documentation is kept in view of key employee data. -Inspected and performed sample testing of 16 supplier signed confirmations to adopt ERG's Supplier Code of Conduct to validate their commitment to Metalkol's key policies as well as the testing of relevant underlying documentation that demonstrate the prohibition of forced labour. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. -Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over forced labour. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of forced labour commitments and how they are implemented through the Company's management systems and related policies, procedures and processes to prevent and mitigate

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<p>13. Freedom of Association and Collective Bargaining</p> <p>Respect workers' rights of freedom of association, to collective bargaining, and to engage in peaceful assembly, prevent and remedy adverse impact.</p>	<p>FM</p>	<p>ERG Group level 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, 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. In addition, freedom of association and collective bargaining (both at the site level and in the value chain) is specifically and continuously assessed through the company's risk assessment process.</p> <p>The right to freedom of association and collective bargaining in the DRC is covered under the national Labor Code. Therefore, at Metalkol, and based on its Human Rights Policy, there is an implemented collective bargaining agreement in place which covers the company's relationship with unions at the site. Any non-compliance with the Policy should be reported to the Compliance Officer, Group Head of International Compliance or through the existing grievance mechanism. Employees who violate this Policy will be subject to disciplinary measures subject to local law, up to and including termination of their employment. Quarterly monitoring reports are submitted to the Group and internal audit periodically review compliance with this Policy.</p> <p>Since suppliers must comply with all applicable employment laws and regulations, they are expected to comply with the right to freedom of association and collective bargaining. Our Supplier Code of Conduct and Agents Compliance Policy also hold our business partners, subcontractors and suppliers to the same high level of ethical business practice as our sites. Suppliers and third parties risks are assessed in accordance with the Group CPDD process. Its purpose is to prevent risks of cooperation with persons or entities that are involved in human rights breaches among other topics.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitment to freedom of association and collective bargaining as publicly communicated through public reporting and policies, such as the Code of Conduct and Human Rights Policy and the Supplier Code of Conduct. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected ERG's Collective Bargaining Agreement in place as established with the different union representatives. -Inspected union meetings to demonstrate the regular engagement with the union representatives. -Inspected HSE Committee meeting minutes to demonstrate the involvement of unions in the site's ESG matters. -Inspected and performed sample testing of 16 employee contracts and inspected the relevant employment terms included. -Inspected the management practices by inspecting relevant human resources policies, procedures, and processes in place. Inspected key training materials to understand how requirements related to this Copper Mark Criteria are embedded in the site's policies and procedures are communicated. -Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over freedom of association and collective bargaining. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of freedom of association and collective bargaining commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of
<p>14. Non-Discrimination and Harassment</p> <p>Respect workers' rights to equality of opportunity and treatment and prohibit, prevent and remedy workplace discrimination and harassment</p>	<p>PM</p>	<p>As part of ERG Code of Conduct, Suppliers Code of Conduct, and the corporate Human Rights Policy, the Group 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 the prohibition of any illegal employment discrimination or harassment. We apply these commitments to our employees, our contractors and our suppliers, and regular training is provided as part of the induction process.</p> <p>At Metalkol, a 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 contracted under Metalkol, new applicants, clients, suppliers, contractors and any other persons having dealings with the business. Risk assessments, action planning, remediation process and implementation of the Policy is monitored by the site Human Resources team.</p> <p>The Metalkol's Clean Cobalt and Copper Performance Report 2025 covering the period 1 May 2024 to 31 July 2025 has been published covering the above mentioned areas in more details.</p>	<p>Metalkol's current management system has leading focus on gendered / sexual harassment and is not fully encompassing other relevant forms of harassment which also require proactive assessments. Metalkol also has some gaps in the content, effective tracking and coverage of training in relation to non-discrimination and harassment.</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitment to non-discrimination and harassment as publicly communicated through public reporting and policies, such as the Code of Conduct, Human Rights Policy, and the Supplier Code of Conduct. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected the management practices by inspecting policies, procedures, and processes in place. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated and mitigated through actions and engagement with the person voicing the grievance. Inspected key training materials to understand how requirements related to this Copper Mark Criteria are embedded in the site's policies and procedures are communicated. Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over non-discrimination and harassment. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of non-discrimination and harassment commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p>
<p>15. Diversity, Equity and Inclusion</p> <p>Promote diversity, equality and inclusion by ensuring equity for all persons in the workplace, respecting the diversity of all workers, and fostering an organizational culture of inclusivity and respect for fundamental rights and dignity.</p>	<p>PM</p>	<p>Metalkol fair employment practices are guided by ERG Code of Conduct which states: "Employees must ensure decisions relating to hiring, training, promotion, discipline, appraisals, remuneration, termination of employment and other conditions of employment (e.g. office space, career opportunities, mobility) are based on merit, qualifications and job specifications without regard to a person's race, colour, religion, national origin, gender, sexual orientation, age, disability, veteran status or other characteristics protected by law". Metalkol identifies and evaluates the impacts and risks on Diversity, Equity and Inclusion through the Metalkol ESG-Human Rights Working Group risk assessment process which also defines the relevant mitigation and remediation actions.</p> <p>Metalkol Equity, Diversity and Localisation Policy commits the site to creating and maintaining an environment which provides equal opportunities to all employees. The Policy 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.</p> <p>Recruitment targets include:</p> <ul style="list-style-type: none"> - Female employment targets: at least 20% of the total workforce - National employees targets: 60% of the workforce should be from the Lualaba and Haut Katanga provinces, with a specific focus on the local communities in which we operate. The rest of the 40% could be recruited from other provinces. <p>Based on the ERG Code of Conduct and Metalkol's Equity, Diversity and Localisation Policy, Human Resources develop career development plans in collaboration with each Head of Department based on the employees' eagerness to career growth and based on merit to ensure an equal opportunity of development, however particular consideration is given towards empowerment of DRC nationals, women, and community members. As part of Metalkol's mentorship program, experienced expatriate staff are required to identify DRC national staff as their buddy for upskilling opportunities. The COO 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 implementation. For any issues, Metalkol Grievance Policy should be used.</p>	<p>Metalkol does not have a sufficiently formalized system to structurally identify its Diversity, Equity and Inclusion gaps and needs of all workers, directly and indirectly employed, and suppliers, across all its departments.</p> <p>Metalkol also has gaps in the content and effective tracking of training in relation to DE&I.</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitment to diversity, equity and inclusion as publicly communicated through public reporting and policies, such as the Code of Conduct and the Equity, Diversity and Localisation Policy. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected the human resources management practices, including recruitment and talent management, by inspecting policies, procedures and processes in place with regards to diversity, equity and inclusion. -Inspected Metalkol's monitoring of the workforce to obtain an understanding of how Metalkol tracks the evolution of the components of its workforce towards improved diversity. -Inspected Metalkol's Collective Bargaining Agreement and union meeting minutes to obtain an understanding of how Metalkol ensures equality and equity across its workforce, in collaboration with the union representative. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected grievance register to obtain and understanding whether grievances related to diversity, equity and inclusion have been received and mitigated. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over diversity, equity, and inclusion. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:20 -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of diversity, equity, and inclusion commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. This included considerations of how Metalkol engages specifically with women from local communities on relevant topics through the Community Women Committee meetings. -Conducted an interview with representatives of Metalkol's Women's Committee to obtain an understanding of the diversity, equity, and inclusion initiatives in place to support women as group of key affected stakeholders in the workforce. -Conducted an interview with the representative of the external Local Procurement Committee to obtain an understanding of their collaboration with Metalkol to recruit

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<p>16. Employment Terms</p> <p>Respect workers' rights to fair and decent employment terms, prevent and remedy adverse impact.</p>	<p>FM</p>	<p>Metalkol demonstrates its commitment to fair employment practices through a set of policies (and associated standards and procedures for implementation). These include the Code of Conduct, Human Rights policy, Supplier Code of Conduct which variously reference the UN Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights (UNGPs). Data to ensure workers' rights are being respected is regularly collected, monitored and analysed in order to gauge the effectiveness of the policies, employment contracts clause, and Collective Agreement implementation. This includes, but is not limited to, data on working hours, overtime, remuneration, social benefits, time off, accommodation and provision of worker contracts, disciplinary actions, and career development. Quarterly monitoring reports are submitted to ERG Africa management.</p> <p>Working Hours Employees are expected to work 5 - 5.5 days a week depending upon their rotational status. Monday to Friday, 07:00-17:00 with a one-hour lunch break (subject to operational requirements). Saturday and Sunday working hours are determined on a weekend work roster.</p> <p>The overtime policy explains when compensation becomes applicable and the procedure to follow for request and authorisation. The company overtime policy is aligned with the DRC Labour law regarding limitations and calculations. As much as possible, the monthly work schedule should provide for the planned overtime. Overtime is voluntary and no employee shall be subject to penalty, nor discrimination, for refusal.</p> <p>Remuneration The pay and benefit rates have been agreed under the Collective Agreement with unions and is known to exceed national barometers, hence positioning Metalkol as an attractive employer.</p> <p>Living Wage Assessment Metalkol has carried out a living wage analysis based on the 2025 Anker Living Income Reference Value for rural areas of the Democratic Republic of Congo (DRC) and it has been concluded that the Site employees' salaries, including those received by its contract workers, exceeds the Income Reference Value within the Anker assessment.</p> <p>Accommodation As part of the Collective Agreement, the parties agree that the company shall pay the workers housing compensation in accordance with section 138 of the Labor Law. For Expats on site and DRC Nationals with a grade of Superintendent or above (and who have their family residence away from Kolwezi) the allocation of the room on camp is guided by the Site Camp Room Allocation Policy.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed: -Inspected Metalkol's commitment to respecting employment terms, as publicly communicated through public reporting and policies, such as the Code of Conduct, Supplier Code of Conduct, and the Human Rights Policy. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, and UNGP. Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks (such as but not limited to working hours, remuneration, social benefits, housing ...).</p> <p>-Inspected human resources policies, procedures, processes in place, such as related to working hours, including overtime, and remuneration, to obtain an understanding of the management practices in place related to employment terms (such as but not limited to working hours, remuneration, social benefits, housing ...).</p> <p>-Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>-Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018</p> <p>-Inspected Metalkol's Collective Bargaining Agreement in place to obtain an understanding of how employment terms have been defined in consideration of the regulatory requirements for working conditions and in collaboration with the different union representatives.</p> <p>-Inspected Metalkol's wage benchmarking exercise against national regulatory requirements & benchmarks for minimum wage.</p> <p>-Inspected Metalkol's living wage analysis based on the Anker Living Income Reference Value.</p> <p>-Inspected union meeting minutes to demonstrate Metalkol's regular engagement with the union representatives.</p> <p>-Inspected HSE Committee meeting minutes to demonstrate the involvement of unions in the site's ESG matters.</p> <p>-Inspected and performed sample testing of 16 employee contracts and inspected the relevant employment terms included</p> <p>-Inspected and performed sample testing of 16 employee records and inspected working hours and remuneration practices, to test that the remuneration exceeds the national minimum wage requirements and the living wage, as defined by the Anker Living Income Reference Value.</p> <p>-Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded.</p> <p>-Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance.</p> <p>-Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over employment terms.</p> <p>-Inspected Metalkol's initiatives to ensure compliance with labour regulatory requirements by reviewing documentation exhibiting Metalkol's submission to regulatory inspections undertaken. This includes considerations of labour inspections performed by the authorities.</p> <p>Inspected key training materials to understand how requirements related to this Copper Mark Criteria are embedded in the site's policies and procedures are communicated.</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed: -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. This included considerations over action plans to address identified risks.</p> <p>-Inspected Metalkol's commitment to managing occupational health and safety, as publicly communicated through public reporting and policies, such as the Code of Conduct and the Human Rights Policy.</p> <p>-Inspected the Safety Health and Sustainability Management System Manual which outlines the roles and responsibilities defined for the health and safety function. This includes amongst others, the Safety Health and Sustainability Manager, the ERG Sustainability Committee, the Metalkol ESG-HR Working Group, and the Metalkol Sustainability/EHS Committee.</p> <p>-Inspected the management practices by inspecting policies, procedures and processes in place, such as occupational health and safety records and reporting to management. Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>-Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated.</p> <p>Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of training.</p> <p>-Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded.</p> <p>-Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated and mitigated through actions and engagement with the person voicing the grievance.</p> <p>-Inspected how Metalkol monitors and reports to management and to the authorities on key health and safety indicators to achieve its zero-harm objective.</p> <p>-Inspected the IsoMetric database and a sample of 16 incidents reports, to obtain an understanding of how Metalkol monitors, manages and assesses health and safety hazards and incident records. This included incident tracking and corrective actions, amongst others.</p> <p>-Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over occupational health & safety.</p> <p>-Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018</p> <p>Interviews conducted: -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of occupational health and safety commitments and how they are implemented through the Company's management systems and related policies, procedures and processes.</p>
<p>17. Occupational Health and Safety</p> <p>Respect workers' rights to healthy working and living conditions, provide all workers with the means and conditions for safe and healthy work, and prevent and remedy adverse impact.</p>	<p>PM</p>	<p>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 for Occupational Health and Safety is informed by ISO 45001:2018 and is under the process of certification.</p> <p>Metalkol SHAS Policy is reviewed periodically by the Management Committee to ensure it meets the set objectives and targets that reflect the Group's vision of Zero Harm in respect to safety, health & sustainability with a strong, commitment to implementation and maintenance of continuous improvement.</p> <p>These define Metalkol's commitment to demonstrating leadership in health and safety, stewardship of the environment and community relations through an effective Integrated Management System. This is designed to ensure compliance with legal and other international requirements such as the IF Performance Standards and also measure and drive continuous improvement in SHAS performance.</p> <p>The Metalkol COO endorses the SHEC Policy by ensuring that: • The Policy is internally communicated and made externally available to stakeholders; • The Policy is an integral aspect of the setting operational objectives and targets and the development of Continuous Improvement (ref. integration of ESG-related Key Performance Indicators (KPIs)).</p> <p>Key elements of the Safety and Occupational Health series of procedures includes: - Identify, assess and mitigate potential hazards systematically for safety and occupational health risks including chronic exposure; - Provide required workplace training to ensure capacity to achieve reasonable safety and occupational health standards, considering scientific knowledge and national and international standards such as ISO; - Use of prescribed appropriate PPE to minimize occupational stressor exposures, safety risks and potential impacts of incident; - Improve and promote safety and occupational health performance through reporting to relevant stakeholders; - 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 based on the formal processes for the identification of hazards and the severity/likelihood assessment; - Ensure contractors and visitors participate in safety and occupational health programs, whilst managing risks in their areas; - Communicate openly with employees, contractors, suppliers, business partners and interested parties to encourage a safety culture that reflects the intent of our Zero Harm strategy</p> <p>As reinforcing our Health & Safety programs to achieve Zero Harm is a management priority, ERG Africa has revised its Occupational Health & Safety reporting culture to ensure data reliability in terms of identified potential risks, accident prevention, and ultimately working towards an improved overall workplace safety and wellness culture. This has resulted in measurable improvements in the site's occupational health and safety performance over recent years.</p>	<p>Metalkol's Occupational Health & Safety management system does not fully include the monitoring of psychosocial hazards and does not provide access to mental health/ wellbeing support.</p> <p>Also, training and awareness raising campaigns do not sufficiently cover health and safety risks related to off site infrastructures and is not sufficiently directed towards affected stakeholders.</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed: -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks.</p> <p>-Inspected Metalkol's commitment to managing occupational health and safety, as publicly communicated through public reporting and policies, such as the Code of Conduct and the Human Rights Policy.</p> <p>-Inspected the Safety Health and Sustainability Management System Manual which outlines the roles and responsibilities defined for the health and safety function. This includes amongst others, the Safety Health and Sustainability Manager, the ERG Sustainability Committee, the Metalkol ESG-HR Working Group, and the Metalkol Sustainability/EHS Committee.</p> <p>-Inspected the management practices by inspecting policies, procedures and processes in place, such as occupational health and safety records and reporting to management. Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>-Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated.</p> <p>Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of training.</p> <p>-Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded.</p> <p>-Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated and mitigated through actions and engagement with the person voicing the grievance.</p> <p>-Inspected how Metalkol monitors and reports to management and to the authorities on key health and safety indicators to achieve its zero-harm objective.</p> <p>-Inspected the IsoMetric database and a sample of 16 incidents reports, to obtain an understanding of how Metalkol monitors, manages and assesses health and safety hazards and incident records. This included incident tracking and corrective actions, amongst others.</p> <p>-Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over occupational health & safety.</p> <p>-Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018</p> <p>Interviews conducted: -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of occupational health and safety commitments and how they are implemented through the Company's management systems and related policies, procedures and processes.</p>
<p>18. Emergency Preparedness</p> <p>Respect the right of workers and stakeholders to keep themselves and other safe in the event of an emergency, by implementing a system to manage emergency responses, prevent and remedy adverse impact.</p>	<p>PM</p>	<p>As part of Metalkol SHAS Management System, the emergency management procedure is in place to ensure that: - Legal requirements with respect to emergency management are defined; - Responsibilities among Metalkol employed personnel as well as its contractors are clearly defined; - A structured set of plans to deal with 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 is in place; and - Facilities, equipment and systems are set up to manage emergency situations.</p> <p>The management system currently in place at Metalkol includes: 1. Systematically identify and document possible scenarios of emergencies using the risk management procedure regularly and whenever there are significant changes to the plant or work site, and to allocate the resources required for emergency response (financial, human capital, equipment, medical facilities, etc.) 2. Ensure an adequate emergency planning map and Call Out including a Crisis Management Team (CT), an Emergency Management/Response Team (EMT/ERT) and an EMT/ERT Room for Control and Operation during an Emergency 3. Develop an action plan including medical emergency services & evacuation, general security, related but not limited to potential spills, fires, falling failures, vehicle incidents while ensuring improvement opportunities are identified and turned into time bound actions. As a result, Metalkol prepares the Emergency Response Plan and distributes the latter to internal and external stakeholders through the HAS Committee whose responsibility is to monitor the execution. Each plan details the requirements for operational and area based emergency situations. It also covers actions required to prevent and manage emergencies, including training, prepares the Emergency drills & continuous improvement.</p> <p>As a minimum, an annual review and scheduled testing of the Emergency Response Plan is conducted to maximise the operation or facilities preparedness for emergency situations.</p> <p>Recovery, clean up, remediation procedures are 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.</p> <p>Taking into account their response capabilities, local authorities are engaged in the development and testing of Emergency Response Plans, where applicable. Emergency Response Plans and risks at the operation or facility are communicated to the local community where appropriate.</p>	<p>The Emergency Response Plan scenarios do not sufficiently include psychosocial and economic security considerations, and do not sufficiently include the stakeholders involved and consideration of local industry actors.</p> <p>The Emergency Response Plan is not sufficiently communicated to all stakeholders.</p> <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed: -Inspected Metalkol's management practices related to emergency preparedness as outlined in the Safety Health and Sustainability management system, by inspecting key policies, procedures and processes. This includes Metalkol's Emergency Response Management Plan and ERG Africa's Emergency Management System Procedure.</p> <p>-Inspected Metalkol's Emergency Response Management Plan to obtain an understanding of the defined emergency response scenarios, including specific emergency response actions. This includes considerations of community integration with regards to emergency preparedness and response</p> <p>-Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. This included considerations over action plans to address identified risks.</p> <p>-Inspected the management practices through inspecting emergency risk assessment, incidence records, reporting to management, training records.</p> <p>-Inspected meeting minutes and presentations demonstrating how Metalkol engages with stakeholders on identified risks and how resulting input contribute to the development of the related action plans.</p> <p>-Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded.</p> <p>-Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance.</p> <p>-Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over emergency preparedness.</p> <p>-Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015</p> <p>-Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated.</p> <p>-Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings.</p> <p>Interviews conducted: -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of emergency preparedness commitments and how they are implemented through the Company's management systems and related policies, procedures and processes.</p> <p>-Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its</p>

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<p>19. Community Health and Safety</p> <p>Respect communities' rights to healthy and safe living conditions through the implementation of a system to prevent health and safety risks and remedy adverse impact.</p>	<p>PM</p>	<p>Metalkol's SHEC Management System includes a Fatal risk protocol and Community procedure. At Metalkol, we believe that all injuries and occupational illnesses are preventable, that protecting and sustaining the environment and having controlled open communication with the community and other stakeholders is part of our normal business conduct to achieve Metalkol's vision of Zero Harm.</p> <p>We have therefore adopted a structured and systematic approach to the management of Safety and Health issues with our hosting communities and ensured that the Site is consulting, collaborating and communicating with our communities, particularly when it comes to including management measures to avoid, reduce and compensate for potential risks identified within the site ESIA.</p> <p>To mitigate the identified risks, Community Health & Safety is integrated within Metalkol's stakeholder engagement processes and community investment. 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 surrounding communities and supporting local water committees. Site environmental monitoring provides data and checks to track potential health impacts related to water, air and land and inform appropriate mitigation planning. Metalkol's performance is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified community health & safety risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Community Health & Safety performance is also monitored through the regular Health & Safety Committees which include representatives of affected stakeholders, local authorities and local medical institutions.</p> <p>Metalkol also engages in dialogue and action where specific community health and safety issues are raised by NGOs and others. These requirements are integrated into the revised Metalkol Health and Safety Policy and procedures.</p>	<p>Metalkol's Community Health & Safety management system does not fully cover all aspects of health and safety hazards in or near communities, including mental health considerations and hazards related to off site infrastructures increasing the conditions for electrical and fire hazards.</p> <p>Metalkol also has gaps in the content, effective tracking and coverage of training in relation health & safety hazards towards community members.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices related to community health and safety as outlined in the Safety Health and Sustainability management system, by inspecting key policies, procedures and processes. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected the management practices through inspecting risk assessments, documentation of community health and safety activities, reporting to management. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over community health & safety. -Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of community health and safety commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. -Conducted interviews with key stakeholders, including with NGO representatives and academia, to obtain an understanding of how they are engaged with to address
<p>20. Community Development</p> <p>Contribute to economic and social development of affected communities through the implementation of a system to positively contribute to meet community needs.</p>	<p>FM</p>	<p>As part of its SHEC Management System, and in addition to its human rights Management System, ERG Africa Social Responsibility Procedures include commitments to local communities in relation to:</p> <ul style="list-style-type: none"> - Identify, assess and systematically mitigate all social adverse impacts; - Monitor, manage and resolve any grievances or issues; - Promote effective communication and respect the culture of everyone; - Maintain open and enduring relationship with traditional leaders, community leaders, and other relevant parties; - Respect the rights of individuals, communities and stakeholders, and contribute to social and economic development with surrounding localities; - Engage and consult proactively with communities where we operate throughout the life of the project; - Recognize the value of cultural heritage and diversity, and protect cultural sites; - Identify and support the development of sustainable and capacity-building social projects within communities, with focus on education, health, and alternative livelihoods; - Avoid involuntary resettlement wherever possible. If unavoidable proceed in line with IF Performance Standards on "Land Acquisition and Involuntary Resettlement". <p>To ensure adequate execution of the Metalkol's Social Management System, a set of several procedures, processes and controls for engagement and collaboration with stakeholders and local communities are in place. Namely, those include specific systems for stakeholder engagement, grievance mechanism, socio-economic development incl. local procurement opportunities, restricted areas and cultural heritage preservation, public consultations, ASM, local recruitment, human rights, resettlement & compensation, among others.</p> <p>As part of Metalkol strategy on social investment, our main current efforts are focused on recruiting staff and source products locally in adjacent communities, as well as work in partnership with communities, regional government and local and international NGOs to support sustainable development amongst those communities most affected by our operation. We endeavour to avoid any community resettlements and our current Life of Mine does not involve any further resettlements. Where we conduct crop compensation, we follow Government and our internal procedures, and this is conducted with oversight from ARIEL (provincial authority) and human rights defenders when required. We provide medical benefits to employees and their dependents and support health initiatives within the wider community.</p> <p>Further information can be found under Criterion 6 – Sustainability Reporting.</p> <p>Through these voluntary commitments, as well as its social obligations such as the Community Commitment Register (Cahier des Charges) and the contribution of 0.3% of annual turnover, Metalkol mitigates its social impacts and contributes to lasting community development considering the mine post-closure impact. The projects emerging from these social obligations use the official Site ESIA as genesis and involve community consultations to ensure the communities' needs are being identified, addressed and prioritized by them. Any complaints from regulatory agencies or the public pertaining to environmental and social compliance issues are handled through the grievance mechanism and stakeholder engagement process when dialogue is required.</p>	<p>Metalkol's Community Health & Safety management system does not fully cover all aspects of health and safety hazards in or near communities, including mental health considerations and hazards related to off site infrastructures increasing the conditions for electrical and fire hazards.</p> <p>Metalkol also has gaps in the content, effective tracking and coverage of training in relation health & safety hazards towards community members.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices related to community development, as managed by the SHEC management system by inspecting key policies, procedures and processes. -Inspected the management practices through inspecting the Community Commitment Register, 0.3% contribution to community development, community development projects, reporting to management, payments made and public reporting. -Inspected the Community Commitment Register to obtain an understanding how funds are allocated to community development projects across the different communities, demonstrating how investment decisions are made & budgets are set up. -Inspected the 0.3% contribution to community development to obtain an understanding of how Metalkol provisions and invests in the 0.3% fund to comply with regulatory community investments requirements. -Inspected documentation of community engagement practices, such as the engagement with local communities and meeting minutes and the resettlement practices of Samukonga community. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over community development. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of community development commitments and how they are implemented through the Company's management systems and related policies, procedures and processes, such as through local recruitment for staff, local procurement practices, community women committees, medical benefits, compensation practices, and partnerships with the local community, government, NGOs. -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. -Conducted interviews with key stakeholders, including with NGO representatives and authorities, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations, including community development.
<p>21. Artisanal and Small-Scale Mining</p> <p>Respect the human rights, create economic opportunities and contribute to the formalization and professionalization of artisanal and small-scale mining operations (ASM) where it is safe, and legally and/or legitimately possible.</p>	<p>FM</p>	<p>RIM Responsible Minerals Assurance Process (RMAP) certification incorporates the OECD Due Diligence Guidance, and procedures in relation to mineral sourcing from Conflict-Affected and High-Risk Areas (Caras), including ASM areas. Metalkol's Chain of Custody Management System is certified under RIM RMAP and none of its production comes from Artisanal and Small-Scale Mining (ASM).</p> <p>Nonetheless, informal ASM activity is present in the vicinity of our operations in the DRC, and we place significant emphasis on helping to improve socio-economic conditions for ASM communities. At Metalkol, the design of the plant only allows processing of tailings and cannot process ore material. In addition, Metalkol's ASM Management System (MS) is underlined by the following principles:</p> <ul style="list-style-type: none"> - Identify, assess, monitor and mitigate any potential ASM-related risk to Metalkol through its ASM Management System - Ensure site does not commercially profit from ASM material, incl. responsible handling of confiscated ASM materials; - The site should not purchase ASM material and shall process only responsible traceable mined minerals; - The site will ensure due diligence maintaining a rigorous chain of custody of its mineral supply in compliance with the OECD DD Guidance for Responsible Supply Chains of Minerals from Caras and the United Nations Guiding Principles on Business and Human Rights (Umps); - ASM threats to Metalkol's operations are prevented and contained by the fencing of operational areas and being secured through access control, monitoring and rapid response; - Acknowledge the importance of ASM livelihood, consider respectful and demarcated coexistence on its non-operational concessions where possible and aim to minimize involuntary resettlement; - Create and maintain good and lasting relationship with ASM communities and authorities for development and to ensure conflict de-escalation in case of increasing risks; - Aim to contribute to sustainable development through investment in livelihoods alternative to artisanal mining and the mitigation of negative ASM related impacts such as child labour and unsafe working conditions. <p>As we acknowledge the important role that ASM plays in supporting much-needed livelihoods in the DRC despite their dire living conditions, and in addition to the committed social projects around our hosting communities which also benefit ASM households, since 2017, we regularly partner with the Good Shepherd International Foundation (GSIF) to help support the long-term sustainable development of local ASM communities living near Metalkol. The programme focuses on alternative livelihoods, social and economic women empowerment, child protection and capacity building.</p>	<p>Metalkol's Community Health & Safety management system does not fully cover all aspects of health and safety hazards in or near communities, including mental health considerations and hazards related to off site infrastructures increasing the conditions for electrical and fire hazards.</p> <p>Metalkol also has gaps in the content, effective tracking and coverage of training in relation health & safety hazards towards community members.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices related to artisanal and small-scale mining, as managed through operational, community and security policies, procedures and processes, seeing ASM is only present within the vicinity of Metalkol's operations. Inspected the management practices to map and monitor artisanal and small-scale mining activities by inspecting risk assessments, monitoring reports, and management reporting practices. -Performed review analytics on Metalkol's historic and current production and export volumes to inspect the stability of volumes on a monthly and yearly basis with regards to the production capacity of the site. -Inspected the chain of custody procedures to obtain an understanding of how Metalkol has designed the site's operational processes for the sole purpose to allow the processing tailings materials. -Inspected Metalkol's RIM RMAP assessment report and certification to obtain an understanding how Metalkol demonstrates compliance with the RIM RMAP requirements, including considerations over ASM. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of ASM management commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. -Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant and community tour artisanal and small-scale mining activities that exist in the vicinity of the Metalkol concession and the impact on local

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<p>22. Security & Human Rights</p> <p>Implement a system to prevent and mitigate risks to human rights related to the conduct of private and public security forces, and remedy adverse impact.</p>	<p>FM</p>	<p>The ERG Group Human Rights Policy includes reference to general commitments towards the UN Universal Declaration, ILO Conventions, and the Voluntary Principles on Security and Human Rights (VPSHR) principles among others. While ERG is not a VPSHR member, its operations in the DRC support the provincial Working Groups and works closely with the DRC official facilitator (Justice) and observer (DCAF).</p> <p>At ERG Africa and Metalkol, extensive procedures are in place in relation to human rights and security, including specific ones related to use of force, public and private security, among others, and are aligned to the Voluntary Principles, the United Nations Guiding Principles on Business and Human Rights (Ungps), and the OECD DD Guidance. The site has in place a training program for its private security personnel on the VPSHR. This alignment will be further confirmed with DCAF and Justicia in 2025 as we have signed an ongoing cooperation agreement to update our security management system (which is an integral part of the Metalkol Social MS and the ESG-HR Working Group bi-monthly risk assessment and progress report mechanism) together.</p> <p>At Metalkol, our guiding principles on human rights and security are documented and communicated in the 12 Golden Rules for Security. In addition, our private security provider (AGS) is a member of The Responsible Security Association (ICoCA). If disagreements/issues with the community arise, the site's Community Liaison Officer is immediately informed and resolution should be proceeded through the site's grievance mechanism and stakeholder engagement processes.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's commitments as publicly communicated through public reporting and policies, such as the Human Rights Policy and the ERG Code of Conduct. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, VPSHR and UNGP. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected Metalkol's RIM RMAP assessment report and certification, ERG's CAHRA procedure and assessment to obtain an understanding how Metalkol assesses and accounts for the risks related to its raw material sourcing as located in a CAHRA country. -Inspected the management practices related to security and human rights, such as the implementation of the Voluntary Principles of Security and Human Rights, Metalkol's 12 Golden Rules for Security, and the inspection of risk assessments, monitoring reports, supplier audits of security contractors and management reporting practices (inspecting their membership with the Responsible Security Association (ICoCA)). -Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. -Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. -Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over pollution. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of security related human rights commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes, including Metalkol's cooperation with DCAF and Justicia.
<p>23. Indigenous Peoples' Rights</p> <p>Respect Indigenous Peoples' rights, including the right to free, prior, and informed consent and engage in an inclusive, transparent, respectful and culturally appropriate manner to prevent adverse impacts and create benefits for Indigenous Peoples.</p>	<p>NA</p>	<p>The ERG Group Human Rights Policy has a specific clause on respecting the rights of Indigenous Peoples (IPs), and at ERG Africa sustainable exploration policy requires the teams to pre-identify any presence of IPs at the very early stage of operations, and to conduct ongoing assessments throughout the life of a mine.</p> <p>In addition, since the DRC is party to the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), its Article 6 "Local commitment and participation should be actively sought and encouraged as a means of promoting the maintenance of the archaeological heritage. This principle is especially important when dealing with the heritage of indigenous peoples or local cultural groups. In some cases, it may be appropriate to trust responsibility for the protection and management of sites and monuments to indigenous peoples" – "Active participation by the general public must form part of policies for the protection of the archaeological heritage. This is essential where the heritage of indigenous peoples is involved" was applied during Metalkol's ESIA – Archaeological and Cultural Heritage Assessment.</p> <p>Therefore, on top of our internal data, the third-party developed and governmental approved ESIA, supported by its Archaeological and Cultural Heritage Assessment, concluded that no IPs have been identified in the area of influence, according to the UN definition of Indigenous Peoples. This is confirmed by the multi-stakeholder engagements, including the Royal Highness Kazembe and Chief Kabimba (customary landowners), as part of the Metalkol ESIA – Archaeological and Cultural Heritage assessment.</p> <p>In addition, Metalkol's restricted areas and cultural heritage procedure requires the Site to conduct complementary studies of experts with the knowledge of traditional or historical communities that have present or past links to the area if any risks of cultural heritage emerge. These stakeholder engagement efforts are also meant to identify any existing IPs.</p> <p>The grievance mechanism as described above is also available in relation to any development related to Indigenous Peoples presence in the areas.</p> <p>Since the Metalkol ESIA is shortly due for renewal, we will ensure that the consultations continue to address IPs and are specifically referenced in the updated ESIA.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices, by inspecting key policies such as the ERG Human Rights Policy as well as the ERGA Sustainable Exploration Policy to obtain an understanding of commitments in view of indigenous rights and identifying their presence. -Inspected public records related to indigenous people in the Democratic Republic of the Congo, including DRC's department for environment & sustainable development's Community Forest database to obtain an understanding on DRC's regulatory requirements on indigenous people rights and where areas of presence of indigenous people have been legally defined. -Inspected the regulatory required and approved Metalkol Environmental and Social Impact Assessment (ESIA) and Metalkol ESIA Archaeological Report, performed with the involvement of local experts, as well as Metalkol risk assessment to obtain an understanding of how the local communities and related risks have been identified and assessed. This includes considerations of the identification of indigenous people. -Inspected Metalkol's assessment and supporting evidence of how Metalkol concluded that no indigenous people have been identified in the area of influence and how Metalkol concluded that the Copper Mark Criteria is not applicable. -Inspected Metalkol's engagement with local communities, the stakeholder engagement plan, and underlying records of stakeholder engagement practices to obtain an understanding of how Metalkol engages with affected stakeholders in identifying related risks. -Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of indigenous people commitments and how they are implemented through the Company's management systems and related policies, procedures and processes -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations.
<p>24. Land Acquisition & Resettlement</p> <p>Respect land rights, prevent involuntary resettlements and physical and economic displacement and, where that is not possible, provide fair compensation, restore or improve the livelihoods and standards of living of displaced people.</p>	<p>FM</p>	<p>The Group Human Rights Policy provides for its affiliates to avoid involuntary resettlements, and in situations where this is unavoidable, constructive engagement with community representatives which complies with national, regional and international human rights standards on resettlement and land acquisitions should be undertaken.</p> <p>ERG Africa recognizes the significance and importance of properly executed resettlements according to IF Performance Standard 5. As a result, Metalkol being the site that executes the resettlement must prepare a Resettlement Action Plan (RAP) that includes all the necessary details and methodologies of the process. It is the responsibility of the SHAS and/or CSR manager on site to keep the official documents corresponding to the different deliverables. Since the physical displacement, during the resettlement, can also cause the affected parties to lose their income or livelihood, these "economically displaced people" are entitled to compensation; details are provided in the ERG Africa procedure on compensation.</p> <p>At Metalkol, the Samukonga community has been resettled in 2018 as part of a voluntary resettlement process. The Resettlement Action Plan (RAP) has been implemented according to IF Performance Standard 5 and reviewed by an international third party based on the DRC laws, Participatory Rural Appraisals (PRAs) reports, Metalkol's ESIA, and consultations with stakeholders including the affected community. The execution of this plan includes infrastructure impacts evaluation, consideration for vulnerable people including gender considerations, physical resettlement and the establishment of a monitoring framework.</p> <p>While during the year, we have provided monthly supplies of food and helped to maintain water supply systems, solar power systems and housing at the village based on received grievances from the resettled community, Metalkol is currently updating its Livelihood Restoration Programme to go beyond agriculture as per beneficiaries' requests. Furthermore, the communities continue to benefit from our broader sustainable livelihood programmes which we are implementing under our Community Development Plan (Cahier des Charges) which includes the construction of a health clinic that will benefit the resettled families and the surrounding communities. We do not expect any other resettlement to take place as per the latest ESIA and current mining plans.</p> <p>In 2023, we also paid compensation to communities living near to Metalkol according to the abovementioned procedure which is informed by the IF Performance Standard 5 on Land compensation. Recently, we have also established a partnership with the local human rights defender IBID to strengthen our future assessment of communities' requests for compensation. Further details can be found in the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices related to land acquisition and resettlement, such as the Human Rights Policy, as well as land acquisition and resettlement related policies, procedures and processes -Inspected the documentation of the resettlement process of the Samukonga community, including the engagement process, meeting minutes and community development activities. -Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over land acquisition and resettlement. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of land acquisition and resettlement commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with community members and NGO representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the community tour the community development activities, such as through visiting constructions sites and existing development projects. -Visited the resettled community of Samukonga to engage with the community and obtain an understanding of their livelihood, wellbeing, and related community development activities by Metalkol.
<p>25. Cultural Heritage</p> <p>Respect the cultural rights of affected stakeholders through the implementation of a system to prevent, and remedy adverse impact to cultural heritage.</p>	<p>PM</p>	<p>While the protection of cultural and archaeological heritage is a legal requirement under provisions of the DRC 2018 Mining Code, the ERG Group Human Rights Policy adopts the definition of cultural heritage as per the UN International Covenant on Economic, Social and Cultural Rights (1966). As a result, ERG Africa cultural heritage management system and its sustainable exploration policy forbid exploration and mining activities in protected and world heritage areas.</p> <p>At Metalkol, and as defined as per the latest approved ESIA, which is informed by the third party conducted Archaeological and Cultural Heritage Assessment, some sites of cultural importance exist in and near the site; however, the intensity of impacts envisaged on ethical and spiritual of populations is considered as moderate. Nevertheless, the site continues to implement the cultural heritage procedure which requires to record on a map the GPS coordinates of any identified sacred site and cultural heritage chance finds, avoid damage to cultural heritage, and if expected adverse impact may occur, the site must 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 area, inspections are regularly conducted to ensure that possible damage, especially cumulative impacts to sites are constantly monitored.</p> <p>Besides the frequent inspections and stakeholder engagement initiatives which enable a proactive approach related to cultural heritage preservation, whenever a grievance is received as an alert to increased risk of adverse impact, Metalkol implements additional procedures and / or targeted action plans to further remove the risks of damaging cultural heritage. The effectiveness of the action plan is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified cultural heritage risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol communicates its commitment towards cultural heritage preservation through its Human Rights training to all its employees and suppliers.</p> <p>The cultural heritage risks and progresses are publicly reported within ERG Group's Sustainable Development Report, the ERG Africa's DRC Integrated Annual Report and the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices related to cultural heritage, such as the ERG Human Rights Policy and the ERGA Sustainable Exploration Policy as well as cultural heritage related policies, procedures and processes, including Metalkol's Cultural Heritage Monitoring procedure, to obtain an understanding of commitments in view of identifying, mapping, monitoring and managing cultural heritage sites and related risks. -Inspected the regulatory required and approved Metalkol Environmental and Social Impact Assessment (ESIA) and Metalkol ESIA Archaeological Report, performed with the involvement of local experts, the ERG Double Materiality Assessment, the ERG Enterprise Risk Management Assessment as well as Metalkol risk assessment to obtain an understanding of how cultural heritage sites and related risks have been identified and assessed. This included considerations over action plans to address identified risks. -Inspected cultural heritage monitoring reports to obtain an understanding of how Metalkol monitors and manages cultural heritage sites, including actions undertaken to maintain and preserve the mapped sites. -Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded. -Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over cultural heritage. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of cultural heritage commitments and how they are implemented through the Company's management systems and related policies, procedures and processes -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations.

Metalkol has gaps in the content and effective tracking of training in relation to Cultural Heritage.

Assessment Summary Report

<p>26. Climate Action</p> <p>Contribute to the goals of the Paris Agreement to curb global temperature rising to 1.5°C above pre-industrial levels through the implementation of a corporate or site-level, comprehensive, integrated climate-change mitigation and adaptation strategy.</p>	<p>PM</p>	<p>Metalkol falls under ERG's corporate commitment on climate change which is articulated within the Group Climate Change Impact and Adaptation Management Policy. The Group is committed to jointly playing its part in mitigating climate change challenges, through its role in supplying critical minerals enabling the global transition to a greener economy.</p> <p>ERG also intends to enhance its climate resilience by ensuring compliance with climate-related regulations in the regions in which it operates, consider the cost of GHG emissions in business decisions and identify the potential long-term impact of climate change on the Group's operations and its hosting communities.</p> <p>At Metalkol, the latest ESIA considers material climate-related risks and impact including but not limited to the carbon dioxide equivalent (tCO₂e) emitted annually by the project to be medium-high risk, while the predicted PM10, PM2.5, SO₂, NO₂ concentrations/emissions are below the IF guideline and DRC standards. The elements of assessment included quantifying and benchmarking against the sector profile, which enabled placing the emissions into context to identify possible mitigation options. As a result, Metalkol has optimized the mining methodology of load & haul stockpile with the addition of dredge mining leading to improved maintenance and operational efficiencies. The site is also assessing other energy efficiency projects including a partnership with SNEL (the state-owned company responsible for electricity) to upgrade existing energy facilities.</p> <p>As a result, and based on our commitment to support the global shift to a low carbon economy as set out in the Paris Agreement and the UN's Sustainable Development Goals, Metalkol has recently partnered with a third-party delivering AI-solutions used by the UN, to reduce the site carbon footprint over the life cycle of our products. The solution will aim at delivering a comprehensive integrated climate change mitigation and adaptation strategy including the assessment of existing energy efficiency projects and recommendations in terms of any new adaptation measures. This is in addition to the existing Memorandum of Understanding we have with one of our customers which aims at gaining and sharing insights on decarbonization plans, as well as identifying projects that could accelerate sustainability performance of the common value chain.</p> <p>Our existing environmental management systems which are informed by ISO14001 are presently in the process of certification. These systems include climate-related risks prioritization and an action plan guiding the implementation of climate mitigation actions. Metalkol's climate action performance is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified climate risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol also conducts training for promoting greater environmental responsibility which is part of the induction process.</p> <p>Our climate-related progress is publicly disclosed through ERG Group's Sustainable Development Report, the ERG Africa's DRC Integrated Annual Report and the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p> <p>At Metalkol, the likely direct, indirect and cumulative environmental, social and health impacts of the mining project in terms of greenhouse gas (GHG) emissions were assessed as follows in the context of its ESIA:</p> <ol style="list-style-type: none"> 1. Benchmarking GHG emissions against pre-defined thresholds 2. Benchmarking GHG emissions against product unit emission intensity; and 3. Considering the contribution of GHG emissions from Metalkol to the DRC's National net GHG emissions. <p>As a result, a procedure has been established as part of Metalkol Safety, Health and Sustainability (SHAS) Management System to provide guidance on GHG emissions management across the site and to maximize reported data quality while ensuring that Metalkol's GHG inventory constitutes a true and fair representation of the site's emissions. This procedure applies to Metalkol's operation and its contractors.</p> <p>In 2021 and 2022, the Site Carbon Footprint calculation of Metalkol's production process against the Global Battery Alliance GHG emission rulebook has been completed. In 2023, our carbon calculation has been provided in the context of the Cobalt Institute LCA, covering relevant scope 1, 2, and 3 emissions for the defined organisational boundaries. In 2024, a comparative preliminary calculation based on the Cobalt Institute 2023 LCA methodology has been performed and which will be further expanded at site-level by using a third-party AI-solution.</p> <p>Commitment to emission reductions has been communicated to relevant business partners and the site is currently improving its management systems to ensure a comprehensive mitigation hierarchy and verify the reliability of its preliminary reduction targets. Meanwhile, since 2023, and as part of its Decarbonization Plan, Metalkol has been exploring various initiatives to deliver on the Group climate commitment including initiatives around the increased use of renewable energy, plant upgrades, production and mining efficiencies, and energy efficiency. As such, the same year, a strategic Energy Projects team was created to manage those key strategic power/energy initiatives. The effectiveness of reducing our GHG emissions is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified greenhouse gas emission risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol also conducts training for promoting greater environmental responsibility which is part of the induction process.</p> <p>Meanwhile, we continue disclosing aggregated product-level data on CO₂e emission in ERG Group's Sustainable Development Report, the ERG Africa's DRC Integrated Annual Report, and the 2025 Metalkol's Clean Cobalt and Copper Performance Report. As a result of the above advancements, we are confident that Metalkol will be a key element to</p>	<p>Metalkol has not finalized the assessment of its climate change mitigation and adaptation measures as per latest international standards, including considerations on worker health and safety, on mine closure and reclamation plans, and the Site has gaps in the content and effective tracking of training in relation to Climate Action.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management commitments regarding climate change as outlined in the ERG Group Climate Change Impact and Adaptation Management Policy -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected underlying documentation related to climate targets, and action plans, including Metalkol's GHG Reduction Roadmap, LCA assessments, and ongoing partnerships with third-parties to enhance its climate change and GHG emissions reductions management practices. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over climate change and reporting on GHG emissions. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of climate action commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant tour the management practices to mitigate and adapt to climate related impacts. This includes, among others, the watering of the increasingly arid roads to prevent dust pollution related to transportation. <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding greenhouse gas emission monitoring, by inspecting relevant policies, procedures and processes, including the ERG Climate Change Policy and the Metalkol GHG reporting procedure. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected underlying documentation related to Metalkol's GHG emissions assessment and data collection processes, such as life cycle assessments and carbon footprint calculations, monitoring practices, and reporting practices to management. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over climate change and reporting on GHG emissions. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of climate action and GHG emissions reduction commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. This includes considerations over energy efficiency projects, development of performance targets and progress on emissions reduction efforts. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG
<p>27. Greenhouse Gas Emissions Reductions</p> <p>Avoid, minimize, and compensate for scope 1, 2 and relevant scope 3 emissions through the definition of science-based goals and targets in line with the Paris Agreement.</p>	<p>PM</p>	<p>At Metalkol, the likely direct, indirect and cumulative environmental, social and health impacts of the mining project in terms of greenhouse gas (GHG) emissions were assessed as follows in the context of its ESIA:</p> <ol style="list-style-type: none"> 1. Benchmarking GHG emissions against pre-defined thresholds 2. Benchmarking GHG emissions against product unit emission intensity; and 3. Considering the contribution of GHG emissions from Metalkol to the DRC's National net GHG emissions. <p>As a result, a procedure has been established as part of Metalkol Safety, Health and Sustainability (SHAS) Management System to provide guidance on GHG emissions management across the site and to maximize reported data quality while ensuring that Metalkol's GHG inventory constitutes a true and fair representation of the site's emissions. This procedure applies to Metalkol's operation and its contractors.</p> <p>In 2021 and 2022, the Site Carbon Footprint calculation of Metalkol's production process against the Global Battery Alliance GHG emission rulebook has been completed. In 2023, our carbon calculation has been provided in the context of the Cobalt Institute LCA, covering relevant scope 1, 2, and 3 emissions for the defined organisational boundaries. In 2024, a comparative preliminary calculation based on the Cobalt Institute 2023 LCA methodology has been performed and which will be further expanded at site-level by using a third-party AI-solution.</p> <p>Commitment to emission reductions has been communicated to relevant business partners and the site is currently improving its management systems to ensure a comprehensive mitigation hierarchy and verify the reliability of its preliminary reduction targets. Meanwhile, since 2023, and as part of its Decarbonization Plan, Metalkol has been exploring various initiatives to deliver on the Group climate commitment including initiatives around the increased use of renewable energy, plant upgrades, production and mining efficiencies, and energy efficiency. As such, the same year, a strategic Energy Projects team was created to manage those key strategic power/energy initiatives. The effectiveness of reducing our GHG emissions is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified greenhouse gas emission risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol also conducts training for promoting greater environmental responsibility which is part of the induction process.</p> <p>Meanwhile, we continue disclosing aggregated product-level data on CO₂e emission in ERG Group's Sustainable Development Report, the ERG Africa's DRC Integrated Annual Report, and the 2025 Metalkol's Clean Cobalt and Copper Performance Report. As a result of the above advancements, we are confident that Metalkol will be a key element to</p>	<p>Metalkol does not have a detailed site-level GHG footprint calculation, nor an approved science-based target in place against which monitoring procedures need to be further defined. Metalkol also has gaps in effectively tracking training in relation to GHG emissions reductions.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding greenhouse gas emission monitoring, by inspecting relevant policies, procedures and processes, including the ERG Climate Change Policy and the Metalkol GHG reporting procedure. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected underlying documentation related to Metalkol's GHG emissions assessment and data collection processes, such as life cycle assessments and carbon footprint calculations, monitoring practices, and reporting practices to management. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over climate change and reporting on GHG emissions. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of climate action and GHG emissions reduction commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. This includes considerations over energy efficiency projects, development of performance targets and progress on emissions reduction efforts. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG
<p>28. Water Stewardship</p> <p>Avoid, minimize, rectify, and compensate for adverse impacts on water balance, flow quality, and access and needs of other water users and wildlife from operational activities.</p>	<p>PM</p>	<p>As part of the Group water stewardship commitment, Metalkol's plant has been designed to operate in a closed loop system so no process water is discharged from our site other than in exceptional circumstances and after testing to ensure compliance with permitting requirements and water standards.</p> <p>Metalkol has a Water Management Plan in place which is based on the ESIA risk assessment and the 3rd party biannual audits, which capture Metalkol's water stewardship updated impacts and risks. Metalkol also reviews frequently the risks and mitigation measures through the ESG-Human Rights Working Group and the Sustainability Committee for the most prioritized ones. The Water Management Plan is designed to prevent any adverse impact on the adjacent watercourses and groundwater, including the conservation of surface water resources. This Water Management Plan focuses on a) the separation of clean and dirty water; b) the treatment of final effluent and surface run-off; c) where practicable, the reduction of raw water consumption by maximizing re-cycling of waste water; d) regular inspection and maintenance of the site drainage system and pollution control facilities; e) regular monitoring of surface water effluent streams and flow rates and groundwater quality; f) the development and regular updating of the site water balance in order to effectively and efficiently manage the water resources across the site.</p> <p>Our water quality monitoring system to monitor the quality, flowrate, and drawdown levels of local surface water (monthly), groundwater (quarterly) and drinking water (monthly) is in line with relevant DRC regulatory requirements and WHO standards – with testing results subjected to accredited laboratory analysis. Those water monitoring plans prepared by third-party specialists cover the site and its surrounding villages. Results are verified via external laboratory analysis and are reviewed by third parties, prior to their annual submission to the DRC Government.</p> <p>While focus is emphasized on the re-use of the recycled water to preserve the natural resources and ecosystem, Metalkol uses channels and trenches through its tailing deposit, to reduce the high TSS (Total Suspended Solid) content in the turbid water entering its site. The system is set to reduce the water velocity and thus allow decantation before water exits the mine site.</p> <p>Metalkol's water stewardship performance is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified water stewardship risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol conducts training for promoting greater environmental responsibility which is part of the induction process. In addition, Metalkol engages closely with key stakeholders on the evolution of water-related risks on site and as part of our community/stakeholder engagement initiatives.</p> <p>Metalkol publicly discloses its risks, planned actions, progress and results related to water stewardship through the ERG Group's Sustainable Development Report, the ERG Africa's DRC Integrated Annual Report and the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>Metalkol does not have water stewardship targets defined and its monitoring processes currently do not capture all aspects of water stewardship (i.e. water consumption, efficiency and off-site conservation programs).</p> <p>In addition, Metalkol has gaps in the content and effective tracking of training in relation to the matter.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding water stewardship, by inspecting related policies, procedures and processes, including Metalkol's Water Monitoring procedure. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected water monitoring reports and lab analysis reports to obtain an understanding of how Metalkol manages and monitors water stewardship parameters against standard thresholds, including water quality. -Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on water stewardship parameters to relevant stakeholders, including management, authorities, and community members. -Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to water stewardship. Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over water stewardship. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of water stewardship commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with academia and NGO representatives, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations.

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<p>29. Waste Management</p> <p>Avoid, minimize and recover all types of waste, including hazardous waste</p>	<p>PM</p>	<p>In ERG Africa we are committed to minimizing waste generation at source and facilitating repair, reuse, and recycling over the disposal of waste.</p> <p>At Metalkol, while the ESIA determines all the operational activities that generate waste and assesses the potential risks, the site implements an Environmental Management System informed by ISO:14001 (certification in progress) including reprocessing, recycling and commercialisation of waste. The Environmental Management System is also informed by regular risk assessment that is performed by the ESG-Human Rights Working Group which includes waste management risks and mitigation measures. This includes proper non-tailings waste management implementation and coordination of Metalkol's approved waste landfill site with the objective to minimise waste generation at source and facilitating repair, reuse and recycling over the disposal of waste.</p> <p>As we reprocess, recycle and commercialise waste, with our efforts being guided by the site Waste Management environmental system, the purpose of this Management System is also to ensure that legal requirements with respect to Waste Management are defined and that all departments and its contractors comply, responsibilities are clearly defined, and waste landfill is safely and effectively managed. Our supplier audit programme covers compliance with relevant standards including "the safe handling, movement, storage, recycling or reuse and disposal of goods" as per our Supplier Code of Conduct.</p> <p>Designated landfills include industrial, hydrocarbon, and domestic landfills, as well as a waste incinerator and building rubble area. As Metalkol does not export hazardous waste, the Basel Convention is not applicable to Metalkol.</p> <p>Where necessary, or whenever a grievance is received as an alert to increased risk related to waste, Metalkol implements additional procedures and / or targeted action plans to further eliminate the risks of waste contamination in its supply chain.</p> <p>The effectiveness of waste management is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified waste risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol also conducts training for promoting greater waste management responsibility which is part of the induction process.</p> <p>Further details can be found in the publicly available ERG Africa's DRC Integrated Annual Report and the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>Metalkol's updated waste reduction targets are not finalized and the Site has gaps in the effectiveness of the monitoring of the waste reduction/recovery/re-use to demonstrate its efforts on improving all aspects of waste management.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding waste management, by inspecting relevant policies, procedures and processes, including Metalkol's Waste Management Procedure, Non-Mineral Waste Procedure and underlying chemicals, acids & hydrocarbon handling procedures. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This includes considerations of the Metalkol External and Internal Traffic Risk Assessment in view of transportation risks as well as action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected hazardous and non-hazardous waste management and monitoring reports to obtain an understanding of how Metalkol manages and monitors waste parameters. -Inspected non-hazardous and hazardous waste management procedures, including considerations of waste related to chemicals, acids hydrocarbon and other non-mineral resources used, to obtain an understanding of how Metalkol handles and transports waste. -Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on waste parameters to relevant stakeholders, including management, authorities, and community members. -Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to waste management. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over waste management. -Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded. -Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of waste management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations.
<p>30. Circular Economy</p> <p>Promote a circular economy through the collection, reuse and recycling of materials at Sites, the reduction of waste and increased resource efficiency.</p>	<p>PM</p>	<p>Metalkol's mining model includes taking historic mining waste (tailings, slag) and re-processing it to recover valuable metals which support the transition to a greener economy. Based on this model, Metalkol contributes to circular economy by treating and repurposing tailings, hence reducing environmental liabilities by transforming waste into a resource, while giving a second chance life to material flows.</p> <p>Metalkol has defined a circular economy management system which is in the process of being further formalized to strengthen the monitoring of end outcomes resulting from the activities such as the commercialization of scraps and other waste types. The system also includes identifying other opportunities to minimize scrap and waste, utilizing by-products from other surrounding industrial processing within our operations, and recover new products from existing waste/materials.</p> <p>The management system also captures Metalkol's activities, such as tailings extraction and processing, production waste streams, and handling of by-product waste streams.</p> <p>In addition, Metalkol is engaging with its business partners on circularity through the supplier audit programme which covers compliance with relevant standards including "the safe handling, movement, storage, recycling or reuse and disposal of goods" as per our Supplier Code of Conduct. Last but not least, partnerships have been established with local recycling companies and Metalkol is aiming to extend this program to communities as the recycled/ reused waste represents a potential opportunity for alternative livelihoods. All recycling partners are subject to Counterparty Due Diligence and must have the required licenses for these activities.</p> <p>The ERG Africa Energy team is also exploring opportunities to implement waste-to-energy initiatives which will aim at reducing landfill waste in the municipalities we operate in.</p> <p>The effectiveness of the circular economy program is tracked with KPIs and monitored regularly through annual, quarterly, and monthly key management reports/meetings where identified waste risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed.</p> <p>Metalkol also conducts training for promoting circularity which is part of the induction process.</p> <p>Further details can be found in the publicly available ERG Group's Sustainable Development Report, ERG Africa's DRC Integrated Annual Report and the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>Metalkol circularity targets in place are missing incoming secondary material flows target (excl. tailings) to enable complete monitoring of the circular economy management system and public reporting thereon.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding circular economy, by inspecting relevant policies, procedures and processes, including Metalkol's Cobalt and Copper Chain of Custody Procedures, outlining Metalkol's operating model based on the reprocessing of tailings waste -This included considerations over action plans to address identified risks. Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected underlying documentation, such as waste recycling and tailing reprocessing data, key actions points, preliminary circular economy targets, and reporting practices to management. -Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on waste parameters and tailings processing to relevant stakeholders, including management, authorities, and community members. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over circular economy. -Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. -Inquired about the management practices related to the onboarding training and induction process, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of circular economy commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant tour the management practices to manage waste, including waste collection system as well as circularity initiatives implemented.
<p>31. Tailings Management</p> <p>Avoid, minimize, rectify, and compensate for adverse impacts from tailings through the implementation of a system to manage on-land tailings in line with internationally recognized frameworks and good practice.</p>	<p>PM</p>	<p>Metalkol's Residual-Storage-Facility (RSF) has been assessed in the ESIA to identify the impacts and risk related to the treatment and storage of tailings material and to define key operational permit requirements. Metalkol reassesses regularly the tailings related impacts and risks through the company's Enterprise Risk Management and ESG-Human Rights risk assessments. Metalkol's RSF is 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) based on a clear roadmap with actions plans and an implementation timeline</p> <p>In 2023, a new Management System was established for the tailings management and we continued our independent, third-party risk review process focused on the condition of the RSF. Reviews are carried out by the external Engineer-of-Record (Eora) 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 (CAD) Dam Safety Guidelines and guidance from the International Commission on Large Dams (ICOLD).</p> <p>At Metalkol, besides internal daily monitoring systems in place, we report the condition of our RSF to our external Eora on a monthly basis (except for few months within the reporting period as a new Eora was appointed), and the operation's management team also conducts quarterly RSF inspections and review meetings with the Eora. 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 (RSF). 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 (DS), 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. Metalkol's tailings management practices inform also Metalkol's Emergency Response Plan to define response measures for tailing emergency scenarios.</p> <p>The existing Eora assessment against full alignment with GISTM was not yet finalized following appointment of a new Eora. Yet, the consequence classification standard has been assessed as meet.</p> <p>The monitoring practices are systematically informing the management system to define, where relevant, actions points, corrective actions and further monitoring practices. The effectiveness of responsibly managing the RSF is monitored quarterly by the Sustainability Committee and bimonthly through specific KPIs during the ESG-Human Rights Working Group, besides being discussed regularly at the Health & Safety Committee which includes local authorities and representatives of affected stakeholders.</p>	<p>Metalkol tailings management system is not fully GISTM compliant.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding tailings management, by inspecting Metalkol's policies, procedures, and processes in place, including external audit reports. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. -Inspected underlying documentation, such as monitoring reports, third party inspections, and reporting practices to management regarding tailings management as well as action plan in place to align the management practices with the GISTM certification requirements. -Performed review analytics on Metalkol's historic and current production and export volumes to inspect the stability of volumes on a monthly and yearly basis with regards to the production capacity of the site. -Inspected the chain of custody procedures to obtain an understanding of how Metalkol has designed the site's operational processes for the sole purpose to allow the processing tailings materials. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of tailings management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Observed during the plant tour the tailing extraction and tailing storage facilities and obtained an understanding of the management practices in place to manage the tailings, such as through monitoring points, fencing the operational areas and reclamation activities. -Observed during the plant tour the management practices to manage tailing water, including the impact on the tailings management on the overall water

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<p>32. Biodiversity and Productive Land</p> <p>Avoid, minimize, restore or replace, and compensate for adverse impacts on biodiversity, soil and productive land, commit to a no-net loss and consider a net gain of biodiversity.</p>	<p>PM</p>	<p>Metalkol's Biodiversity Management Plan is informed by the ESIA which identifies and assesses the impacts and risk related to biodiversity and productive land. Metalkol reassesses regularly the biodiversity and productive land impacts and risks through the ESG-Human Rights risk assessments.</p> <p>Metalkol Biodiversity Management Plan sets out appropriate biodiversity conservation and protection objectives, expected results and Key Performance Indicators have been compiled by a third party in accordance with the closure plan and the intended final use of the land for the site.</p> <p>The Biodiversity Management Plan sets out appropriate biodiversity conservation and protection objectives to prevent the following adverse impacts while following the mitigation hierarchy:</p> <ul style="list-style-type: none"> -Loss of 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 Supply, Soil Stability and Erosion Control <p>The above ESIA and Biodiversity Management Plan have been informed by a gap analysis audit performed in 2017 against IF Performance Standards to align the submitted ESIA to international standards. The ESIA and the related Biodiversity Management Plan set out the mitigation measures (based on a mitigation hierarchy) against the identified risks and form the basis of the management commitment.</p> <p>In 2023, we started collaborating with a DRC University in the development of a nursery to identify species tolerant to tailings "pollution" as described in the ESIA, which will as well assist with the rehabilitation process and strengthen the biodiversity program.</p> <p>The 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.</p> <p>An annual environmental report and biannual environmental audits are shared with the authorities which includes progress made against the ESIA management plan. Metalkol's ESIA and Biodiversity study are currently being updated.</p>	<p>Metalkol's biodiversity and productive land management system is not sufficiently formalised with gaps mainly in the fields of training, stakeholder engagement and monitoring processes.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding biodiversity and productive land, by inspecting Metalkol's policies, procedures and processes in place, including the latest Biodiversity Management Plan which is being finalised. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Inspected underlying documentation, such as biodiversity monitoring reports, third party biodiversity assessments, and reporting practices to management. -Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on environmental parameters to relevant stakeholders, including management, authorities, and community members. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over biodiversity. -Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. -Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of biodiversity commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with academia to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations, including biodiversity rehabilitation. <p>Onsite observation:</p> <ul style="list-style-type: none"> -Conducted the plant tour and community tour the fires and fauna in and around the concession and the management practices in place to address the impact of <p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding pollution, by inspecting Metalkol's Pollution Management Plan and related policies, procedures, and processes in place. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on pollution parameters to relevant stakeholders, including management, authorities, and community members. This includes considerations over air quality emissions and water quality parameters. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to pollution. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over pollution. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of pollution management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures, and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG
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<p>33. Pollution</p> <p>Avoid, minimize, rectify, and compensate for adverse impacts on human health and the environment caused by pollution from the introduction of poisonous and harmful substances to air, land, and water and from noise, light, and visual pollution.</p>	<p>FM</p>	<p>At ERG, we seek to preserve and maintain healthy, natural environments through the application of sustainable practices wherever we operate.</p> <p>Metalkol is committed to minimizing pollution following the wider ERG Africa position statements:</p> <ul style="list-style-type: none"> - Ensure that environmental aspects, risk and mitigation measures are integrated into business planning and decision-making processes; - Prevent spill, pollution, disturbance and/or degradation of ecosystems and train employees/ contractors to meet environmental objectives. <p>The 2022 approved ESIA includes evaluation of the potential effects of Metalkol operations in terms of pollution to groundwater, soil, surface water and air. Pollution risks have been added to the ESG- Human Right Working Group Risk Register which serves as the basis to apply the mitigation hierarchy, namely the prevention and management of risks by ensuring timely mitigation measures in place.</p> <p>The ESIA also identifies the required pollution-related mitigation interventions to address potential adverse impacts. This includes monitoring programs in maintaining pollution levels within regulated limits and estimated required financial resources. The ISO 14001 certification is underway.</p> <p>Overall, the site environmental management procedures and management plans for environmental aspects include soils, land use and land quality, climate and air quality, greenhouse gas impacts, noise and vibration, surface water and groundwater and terrestrial ecology. For example, to mitigate risks related to discharge of acidic solutions into the environment, level transmitters have been installed in event ponds, an environmental spill pond has been constructed and commissioned, and protectives berms have been constructed. Where necessary, or whenever a grievance is received as an alert to increased risk related to pollution, Metalkol implements additional procedures and / or targeted action plans to further remove the risks of pollution in its supply chain.</p> <p>The Metalkol Environmental Department is responsible for monitoring the environmental performance. Bi-monthly reports are provided to the Metalkol COO through the ESG-HRWG, quarterly to the regional management through the ERG Africa Sustainability Committee.</p> <p>Based on the ESIA Management Plans, Metalkol reports its progress bi-monthly to the DRC government by means of the Safety and Health Committee Meeting and submits an annual progress report to the DRC authorities.</p> <p>Further details can be found in the publicly available ERG Group's Sustainable Development Report, ERG Africa's DRC Integrated Annual Report and the 2025 Metalkol's Clean Cobalt and Copper Performance Report.</p>	<p>Metalkol's pollution management system is not sufficiently formalised with gaps mainly in the fields of training, stakeholder engagement and monitoring processes.</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> -Inspected Metalkol's management practices regarding pollution, by inspecting Metalkol's Pollution Management Plan and related policies, procedures, and processes in place. -Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. -Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. -Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on pollution parameters to relevant stakeholders, including management, authorities, and community members. This includes considerations over air quality emissions and water quality parameters. -Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. -Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to pollution. -Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over pollution. -Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. -Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> -Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of pollution management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. -Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures, and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. -Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG
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Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc

<p>1. Due Diligence Management System</p>	<p>FM</p>	<p>Metalkol conformance with this standard is demonstrated through its RIM RMAP certification . Please refer to the RIM RMAP public conformant list: https://www.responsiblemineralsinitiative.org/facilities-lists/active-conformant-facilities-list/</p>		
<p>2. Risk Identification</p>	<p>FM</p>	<p>Metalkol conformance with this standard is demonstrated through its RIM RMAP certification Please refer to the RIM RMAP public conformant list: https://www.responsiblemineralsinitiative.org/facilities-lists/active-conformant-facilities-list/</p>		
<p>3. Risk Assessment</p>	<p>FM</p>	<p>Metalkol conformance with this standard is demonstrated through its RIM RMAP certification</p>		
<p>4. Risk Management</p>	<p>FM</p>	<p>Metalkol conformance with this standard is demonstrated through its RIM RMAP certification</p>		
<p>5. Public Reporting</p>	<p>FM</p>	<p>Metalkol conformance with this standard is demonstrated through its RIM RMAP certification Please refer to the RIM RMAP public conformant list: https://www.responsiblemineralsinitiative.org/facilities-lists/active-conformant-facilities-list/</p>		

Identified Gaps and Improvement Activities (for criteria determined to be does not meet or partially meets)				
Criterion	Rating	Identified gaps		Site response (optional)
CRITERION 1: Management System	PM	ISO 45001:2018 and ISO 14001:2015 certification ongoing. Improving the delivery and tracking of training to all employees and other stakeholders as applicable.		While Metalkol aims to finalize its ISO 45001:2018 and ISO 14001:2015 certification for the next reporting period, the site is also investing some additional efforts in improving its delivery and tracking of training to all employees (and other stakeholders as applicable) via the site recently accredited training center.
CRITERION 2: Risk Assessment	PM	For some of the ESG issues that have been prioritised, Metalkol does not have action plans.		Moving forward, ERG and Metalkol will work closely together to better link the Group Enterprise Risk Management system with the site ESG-Human Rights Working Group risk register. This will result in a holistic action plan better informing the prioritization of ESG issues and the required resource allocation.
CRITERION 9: Mine Closure and Reclamation	PM	Metalkol Mine Closure Plan does currently not yet foresee scenarios for temporary / sudden closure. Metalkol does currently not perform continuous engagement with stakeholders related to mine closure activities and has currently not fully assessed specific opportunities creating post-closure benefits for affected stakeholders (e.g. in terms of economic situation and employment).		Based on its third-party developed Closure Plan and officially approved ESIA, Metalkol shall start with its progressive rehabilitation 1-2 years before closure (scheduled in 2032). As such, broad consultations with affected stakeholders to identify opportunities for where progressive rehabilitation and closure can create benefits, will take place during the revision of the site's ESIA due in 2026. This will ensure Metalkol works towards a supported vision for post-closure. Scenarios for temporary/sudden closure will also be further investigated.
CRITERION 10: Responsible Supply Chains (Part I)	PM	Metalkol's supplier audits to be strengthened by integrating key sustainability-related KPIs into all supplier audits and process to be enhanced with clear follow-up on supplier audit conclusions and action points.		Part I - Moving forward, stronger emphasis will be given to improve progress reports on key sustainability-related KPIs and to enhance follow-up on supplier audit conclusions and action points.
CRITERION 14: Non-Discrimination and Harassment	PM	Metalkol's current management system has leading focus on gendered / sexual harassment and is not fully encompassing other relevant forms of harassment which also require proactive assessments. Metalkol also has some gaps in the content, effective tracking and coverage of training in relation to non-discrimination and harassment.		While the site focus was on improving its gendered / sexual harassment preventive systems, moving forward, Metalkol's efforts will be geared towards improving its data management process and training packages to demonstrate effectiveness in mitigating other potential forms of harassment.
CRITERION 15: Diversity, Equity and Inclusion	PM	Metalkol does not have a sufficiently formalized system to structurally identify its Diversity, Equity and Inclusion gaps and needs of all workers, directly and indirectly employed, and suppliers, across all its departments. Metalkol also has gaps in the content and effective tracking of training in relation to DEI.		While Metalkol's focus was on establishing a management system in relation to diversity, equity and inclusion, moving forward, the site efforts will be geared towards improving its data management in relation to identified gaps and needs assessment, which will demonstrate the Site effectiveness in meeting its established targets, and towards updating its training packages.
CRITERION 17: Occupational Health and Safety	PM	Metalkol's Occupational Health & Safety management system does not fully include the monitoring of psychosocial hazards and does not provide access to mental health/ wellbeing support. Also, training and awareness raising campaigns do not sufficiently cover health and safety risks related to off site infrastructures and is not sufficiently directed towards affected stakeholders.		While Metalkol is implementing long-term corrective measures including but not limited to eliminating hazards through engineering controls and strengthening its training & awareness campaigns to its stakeholders, the site will also improve its monitoring of psychosocial hazards as well as access to mental health and wellbeing support.
CRITERION 18: Emergency Preparedness	PM	The Emergency Response Plan scenarios do not sufficiently include psychosocial and economic security considerations, and do not sufficiently indicate the stakeholders involved and consideration of local industry actors. The Emergency Response Plan is not sufficiently communicated to all stakeholders.		Emergency Response Plans and scenario-based risks at the operation or facilities in its vicinity will be further refined and communicated to potentially affected stakeholders as part of the site stakeholder engagement plan. A particular focus on psychosocial health and economic security will be included. The Emergency Management Team (EMT) will conduct campaigns to raise community awareness through training in French & Swahili and community assembly points will be designated.
CRITERION 19: Community Health and Safety	PM	Metalkol's Community Health & Safety management system does not fully cover all aspects of health and safety hazards in or near communities, including mental health considerations and hazards related to off site infrastructures increasing the conditions for electrical and fire hazards. Metalkol also has gaps in the content, effective tracking and coverage of training in relation health & safety hazards towards community members.		Since Metalkol's ESIA is due for revision in 2026, the site will ensure a comprehensive risk assessment on community health and safety with a particular focus on mental health. As a result of this assessment, specific training and campaigns will be developed for internal and external stakeholders.

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CRITERION 25: Cultural Heritage	PM	<p>Metalkol has gaps in the content and effective tracking of training in relation to Cultural Heritage.</p>	<p>While the management system to prevent and mitigate risks of adverse impact on cultural heritage is established, Metalkol will ensure relevant managers, personnel and contractors are appropriately trained via the new Metalkol's accredited training center.</p>
CRITERION 26: Climate Action	PM	<p>Metalkol has not finalized the assessment of its climate change mitigation and adaptation measures as per latest international standards, including considerations on worker health and safety, on mine closure and reclamation plans, and the Site has gaps in the content and effective tracking of training in relation to Climate Action.</p>	<p>Metalkol has entered into a partnership utilizing a Climate AI solution used by the UN to refine its Climate-related strategies. This partner will further assess the existing baseline provided within the ESIA and advise on the most appropriate target formulation to align with global climate commitments, support the establishment of a monitoring system to track progress, and suggest needed adaptation and further mitigation measures related to climate management. The scope of the third party also includes providing training to Metalkol's internal and external stakeholders.</p>
CRITERION 27: Greenhouse Gas Emissions Reductions	PM	<p>Metalkol does not have a detailed site-level GHG footprint calculation, nor an approved science-based target in place against which monitoring procedures need to be further defined. Metalkol also has gaps in effectively tracking training in relation to GHG emissions reductions. Metalkol does not have formalized energy efficiency targets in place and currently does not formally explore opportunities for carbon capture and storage, nor compensation or offsetting.</p>	<p>Metalkol is in the process of conducting a thorough benchmarking of existing GHG management frameworks and regulations within the mining industry, implementing advanced methodologies to accurately measure and analyze site-level GHG emissions, setting realistic and achievable targets based on avoidance/mitigation opportunities, and enhancing accurate and reliable data through regular reporting of progress against established GHG reduction targets. Once the management system is finalized, training to Metalkol's internal and external stakeholders will be provided.</p>
CRITERION 28: Water Stewardship	PM	<p>Metalkol does not have water stewardship targets defined and its monitoring processes currently do not capture all aspects of water stewardship (i.e. water consumption, efficiency and off-site conservation programs). In addition, Metalkol has gaps in the content and effective tracking of training in relation to the matter.</p>	<p>As part of its ongoing stakeholder engagement, and as access to clean water and regional water quality are identified as a main risk and priority topic, Metalkol will engage with NGOs and other stakeholders to set relevant water stewardship targets based on existing KPIs and further reflect all aspects of water stewardship in Metalkol's current monitoring system. Training on responsible water management will be provided to Metalkol's internal and external stakeholders.</p>
CRITERION 29: Waste Management	PM	<p>Metalkol's updated waste reduction targets are not finalized and the Site has gaps in the effectiveness of the monitoring of the waste reduction/recovery/re-use to demonstrate its efforts on improving all aspects of waste management.</p>	<p>While the site's targets are still being finalized based on the established KPIs, Metalkol's efforts will be geared towards improving its system to include the principles of waste mitigation hierarchy and enhance its monitoring process to demonstrate effectiveness towards meeting its waste reduction/recovery goals.</p>
CRITERION 30: Circular Economy	PM	<p>Metalkol circularity targets in place include recycling targets but are missing incoming secondary material flows target (excl. tailings) to enable complete monitoring of the circular economy management system and public reporting thereon.</p>	<p>An assessment of the circularity of waste materials is being finalized which will include some preliminary targets. A pilot is due to start in collaboration with local communities which will inform the management system effectiveness towards meeting the targets and result in a regional circular economy strategy. While Metalkol circularity targets in place include recycling targets, there are missing incoming secondary material flows target (excl. tailings) to enable complete monitoring of the</p>
CRITERION 31: Tailings Management	PM	<p>Metalkol tailings management system is not fully GISTM compliant.</p>	<p>In addition to the formal annual reviews and quarterly inspections, we will initiate (in line with the GISTM) a supplementary Dam Safety Review. This will be carried out by either an International Tailings Review Board or by a Senior Independent Technical Reviewer. Following completion, a further action plan towards GISTM compliance will be finalized.</p>
CRITERION 32: Biodiversity and Productive Land	PM	<p>Metalkol's biodiversity and productive land management system is not sufficiently formalised with gaps mainly in the fields of training, stakeholder engagement and monitoring processes.</p>	<p>An enhanced Metalkol biodiversity management system, including training, stakeholder engagement and reporting initiatives, is currently being developed to strengthen the monitoring of our progress towards our ambitions of achieving no net loss and net gain of biodiversity.</p>

This document does not intend to, nor does it, replace, contravene or otherwise alter the requirements of The Copper Mark Articles of Association or any applicable national, state or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein and has not, unless expressly stated otherwise, been independently audited or verified by any third party and is subject to change at any time, without notice.

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Appendix B - PwC's procedures performed

Summary of findings		
Criterion	Rating*	Procedures performed by the Assessment Firm
Criteria	Subject Matter	PwC's procedures performed
1. Management System	Partially Meets	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected the Company's commitments that are communicated via key policies, website, public reporting, intranet, trainings, and posters on site. - Inspected the Company's management systems and alignment with the risk classification for all relevant Copper Mark criteria. - Inspected policies, procedures, and processes to obtain an understanding of the design of the management system. - Performed sample testing procedures on the implementation practices of the management system. - Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected reporting to public authorities and external stakeholders, including the Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group Sustainable Development Report. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. - Inquired about the management practices related to the training of relevant stakeholders across the relevant 33 Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Regarding the management practices across all 33 Copper Mark Criteria, engaged with a total of 79 people through in person and remote interviews, including with management, employees, union representatives, contractors, suppliers, community members, NGOs, authorities, and academia. - Conducted interviews with Metalkol and ERG corporate group management representatives to confirm their understanding and awareness of the commitments and how they are implemented through the Company's



		<p>management systems and related policies, procedures and processes. as well as the ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015.</p> <p>Onsite observation:</p> <ul style="list-style-type: none"> - Conducted a plant and community tour to inspect that management practices are effectively implemented and communicated to ensure the awareness and understanding of stakeholders. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the “Opinion” paragraph of the reasonable assurance report.</p>
2. Risk Assessment	Partially Meets	<p>To obtain reasonable assurance on ERG Metalkol’s Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol’s risk and impact assessments conclusions and relevant underlying documentation of the risk assessment methodology, risk assessment documentation and meeting minutes, which included the ERG Compliance Risk Management Procedure, ERG Enterprise Risk Management Assessment, the ERG Double Materiality Assessment as well as the Metalkol ESG & Human Rights Risk Assessment and the Metalkol Environmental and Social Impact Assessment (ESIA). - Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. - Inspected for each Copper Mark-relevant risks, the defined management practices and action plans that the risk & impact assessments have defined to mitigate the identified risks, such as through the inspection of the SHEC Management System and the governance and integrity management systems. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected meeting minutes and presentations demonstrating how Metalkol engages with stakeholders on identified risks and how resulting input contribute to the development of the related action plans. - Inspected Metalkol’s public reporting on its risk management systems through the Metalkol Clean Cobalt & Copper Report, the ERG Africa’s DRC Annual Integrated Report and the ERG Group’s Sustainable Development Report as well as websites. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the



	<p>environmental management system in line with ISO 14001:201.</p> <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of the risk assessment methodology, risk assessment conclusions and reporting processes with regards to Metalkol. -Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant and community tour Metalkol’s operations and engagement with communities to obtain an understanding of the risks and impacts as identified and assessed in Metalkol’s risks and impacts assessments and to implement appropriate actions. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the “Opinion” paragraph of the reasonable assurance report.</p>
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<p>3. Business Integrity</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitments related to business integrity by inspecting key policies, among others the ERG Code of Conduct, Anti-Bribery and Corruption Policy, Agents Compliance Policy, Anti-Money Laundering Policy, Human Rights Policy, Anti-Trust and Competition Compliance Policy, CSR Projects and Sponsorship Policy, International Economic Sanctions Policy, Personal Data Protection Policy, Group Tax Policy, Supplier Code of Conduct, as well as the related processes and procedures in place to implement these policies. - Inspected ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues and risks related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected Metalkol's public reporting on these commitments through the DRC EITI reporting, Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report, and the ERG Group's Sustainable Development Report as well as websites. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of business integrity commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. - Conducted interviews with key stakeholders, including with employees and contractors to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant tour how business integrity commitments are
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		<p>communicated to employees, contractors, visitors such as for instance through posters at key locations at the central entrance, offices and lunch facilities.</p> <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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4. Revenue Transparency	Fully Meets	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitments to providing revenue transparency, as outlined in key policies among other the ERG Tax Policy and the Group Accounting Manual. - Inspected Metalkol's public reporting on these commitments through the Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group Sustainable Development Report as well as websites. - Inspected ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Inspected the revenue transparency reporting through the DRC EITI reporting (i.e. inspected the most recent published 2022 EITI reporting and Metalkol's most recent 2023 reporting to the EITI) as well as the underlying documentation at Metalkol, such as the publicly available ERG audited financial statements according to the IFRS standards and the Metalkol audited financial statements according to OHADA standards. - Inspected ERG's reporting on Payments to Governments under the EU Accounting Directive (2013/34/EU) and OECD Country-by-Country Report under OECD BEPS Action 13 to the Luxembourg authorities. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management to obtain a clear understanding of the revenue transparency obligations and management system in place related to the providing revenue transparency through the EITI reporting and through the EU Accounting Directive. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>5. Legal Compliance</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's legal management system, through policies, procedures and processes that are in place to govern legal compliance including identification and tracking of relevant legal requirements, - Inspected the legal register used as regulatory matrix and reporting practices to management of how Metalkol's management is being informed about changes to the legal obligations. - Inspected ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. <p>Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings.</p> <ul style="list-style-type: none"> - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. - Inspected Metalkol's plans and actions to ensure compliance with regulatory requirements by reviewing documentation exhibiting Metalkol's reporting to the regulatory authorities, as well as regulatory inspections and audits undertaken. - Assessed the grievance mechanism management system in place against the UN Guiding Principle 31 requirements. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol management and ERG corporate group management to obtain an understanding how the legal compliance is managed by the legal department as well as the key policies governing legal compliance, including the mechanisms in place to identify and track compliance
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		<p>with applicable laws and regulations.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with employees and contractors to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour, posting of relevant policies and procedures derived from the applicable legal requirements and how these should be implemented in practice. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>6. Sustainability Reporting</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected ERG group and Metalkol's public reporting to assess the reported disclosures and alignment with international standards through the Metalkol Activity Data Summary established as per DRC's disclosure obligations, Metalkol Clean Cobalt & Copper Report, the ERG Africa's DRC Annual Integrated Report and the ERG Group Sustainable Development Report established as per the GRI standards as well as websites. - Inspected Metalkol's Annual environmental and social performance report against the official Environmental and Social Impact Assessment (ESIA). - Inspected Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues are identified. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives to obtain an understanding on the reporting processes in place and how Metalkol collects, measures, analyses and communicates information on key material ESG issues. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>7. Grievance Mechanism</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected the grievance mechanism management system through inspecting the policies, procedures and processes in place including the Grievance Mechanism Procedure and the underlying documentation of the grievance register, inspecting how access to stakeholders is provided offering anonymity and non-retaliatory responses to grievances. - Performed testing procedures for a sample of grievances to inspect how grievances have been addressed and mitigated in accordance with Metalkol's policies and procedures - Inspected training materials to evidence how Metalkol communicates and instructs employees and contractors on the use of the grievance mechanism. - Performed detailed testing on a sample of 16 employee training records to verify the occurrence of trainings. - Inspected meeting minutes and public displays to evidence site's engagement with relevant stakeholders (such as the regular visits by the Community Liaison Offers), including community members and employees on grievances and the use of the grievance mechanism. - Assessed the grievance mechanism management system in place from a design and effectiveness perspective against the UN Guiding Principle 31 requirements for the mechanism to be sufficiently legitimate, accessible, predictable, equitable, transparent, rights compatible and a source of continuous learning and based on an engagement and dialogue with stakeholders. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance, in line with the Metalkol grievance mechanism management system. - Inspected the online ERG Integrity Line to ensure public access of the grievance mechanism to all stakeholders <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of grievance management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes and how grievance work as source of continuous learning to improve management practices. - Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks
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		<p>relevant to Metalkol and its operations to obtain an understanding on the effectiveness of the grievance mechanism in terms of the legitimacy of the grievance mechanisms, the equitability, accessibility and predictability of the process as well as the process to transparently report on the grievance addressed.</p> <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant and community tour the grievance mechanism in form of posters and reporting channels that create awareness and equitable access and transparency for internal and external stakeholders to the grievance mechanism. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>8. Stakeholder Engagement</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected the stakeholder engagement management system to obtain an understanding of the policies, procedures, and processes in place to engage with key stakeholders. - Inspected the Metalkol Environmental and Social Impact Assessment and stakeholder mapping which identified the key stakeholders, risks, impacts and areas of influence and further inspected the ERG Double Materiality Assessment, the ERG Enterprise Risk Management Assessment and the Metalkol ESG and Human Rights risk assessment to obtain an understanding of the risks and impacts related to stakeholders. - Inspected the stakeholder engagement plan and inspected underlying documentation of the inclusive engagement activities with stakeholders on the relevant risks and impacts, including the related public disclosures. - Inspected meeting minutes and presentations demonstrating how Metalkol engages with stakeholders on identified risks and how resulting input contribute to the development of the related action plans. - Inspected key reports and documentation demonstrating how Metalkol addresses the reporting expectations of relevant local authorities. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over stakeholder engagement. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of stakeholder engagement commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. - Conducted interviews with key stakeholders, including with employees, contractors and 10 community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. - Conducted interviews with key stakeholders, including with NGOs, authorities and academia to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations.
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		<p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant and community tour stakeholder engagement activities of Metalkol's management. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>9. Mine Closure and Reclamation</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected the mine closure and reclamation management practices by inspecting the mine closure plan and reclamation, as well as the rehabilitation procedures and processes and underlying documentation in place, including an inspection of the impact on other relevant aspects, such as among others biodiversity, water management, tailings storage, community engagement. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements related to mine closure and reclamation. Inspected the financial provisions and payment of related bonds made for the foreseen mine closure activities determined based on the preliminary rehabilitation and closure associated costs. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over mine closure and reclamation. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of mine closure and reclamation commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including academia, to obtain an understanding of the mine closure and reclamation activities, including rehabilitation, performed by Metalkol. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant and community tour relevant locations to the mine closure and reclamation process, including the tailings Residue Storage Facility, and inspected the ongoing rehabilitation practices performed. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>10. Responsible Supply Chains</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected the responsible supply chain management systems in place related to the raw material sourcing as well as business partner management through the inspection of policies, procedures and processes in place (e.g. Counter Party Due Diligence Policy (CPDD), Supplier Code of Conduct, Procurement Policy). - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected through the Cobalt and Copper Chain of Custody Procedure, the material flow from extraction, processing, and shipping to obtain and understanding of the chain of custody management practices. - Inspected for a sample of 16 business partner records how Metalkol performs counterparty due diligence and supplier audits as part of Metalkol's internal auditing practices. - Inspected Metalkol's RMI RMAP assessment report and certification, ERG's CAHRA procedure and assessment to obtain an understanding how Metalkol assesses and accounts for the risks related to its raw material sourcing as located in a CAHRA country. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over responsible supply chain management. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of supply chain and due diligence commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks
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		<p>relevant to Metalkol and its operations.</p> <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the process and control measured for the extraction, processing, and shipping of the raw materials. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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11. No Child Labor	Fully Meets	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitment as publicly communicated through public reporting and policies, such as the Code of Conduct, Human Rights Policy, and Supplier Code of Conduct. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, and UNGP principles. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected the management practices by inspecting policies, procedures and processes measures in place, such as through the recruitment and HR onboarding procedures as well as the access controls measures at site prohibiting the employment of those under 18 years old. - Inspected and performed sample testing of 16 HR records and underlying supportive evidence to confirm appropriate documentation is kept in view of key employee data. - Inspected and performed sample testing of 16 supplier signed confirmations to adopt ERG's Supplier Code of Conduct to validate their commitment to Metalkol's key policies as well as the testing of relevant underlying documentation that demonstrate the prohibition of employment of those under 18 years old as (such as among others through contracts, ID). - Inspecting a sample of 16 business partner records of how Metalkol performs counterparty due diligence and supplier audits as part of Metalkol's internal auditing practices, such as related to Labour Brokers, including the testing of employment records that demonstrate the terms and conditions of prohibiting the employment of those under 18 years old. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected management practices in place to address the risk of child labour among business partners and in the community, by inspecting underlying documentation of supplier audits and community engagement programs. - Inspected Metalkol's Clean Cobalt and Copper Performance Report,
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	<p>ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over child labour as well as inspecting Metalkol's RMI RMAP assessment report</p> <ul style="list-style-type: none"> - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of human rights and child labour commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. - Conducted interviews with key stakeholders, including with NGO representatives, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations, including related to initiatives to keep children out of mines. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant tour the processes and access controls in place to manage the child labor risks, among other through access control measures as well as awareness creation through posters, requirements outlined in job advertisements. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>12. No Forced Labor</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitment as publicly communicated through public reporting and policies, such as the Code of Conduct, Human Rights Policy, and Supplier Code of Conduct. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, and UNGP principles. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected the management practices by inspecting policies, procedures and processes in place, such as through the recruitment and HR onboarding procedures as well as internal auditing procedures. - Inspected management practices in place to address the risk of forced labour among business partners by inspecting underlying documentation of supplier audits. - Inspected and performed sample testing of 16 HR records and underlying supportive evidence to confirm appropriate documentation is kept in view of key employee data. - Inspected and performed sample testing of 16 supplier signed confirmations to adopt ERG's Supplier Code of Conduct to validate their commitment to Metalkol's key policies as well as the testing of relevant underlying documentation that demonstrate the prohibition of forced labour. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are
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		<p>publicly reported on, including over forced labour.</p> <p>Interviews conducted:</p> <ul style="list-style-type: none">- Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of forced labour commitments and how they are implemented through the Company's management systems and related policies, procedures and processes to prevent and mitigate forced labour on site and in the supply chain with contractors and suppliers.- Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the processes in place to treat employees, such as through site access management and where relevant transportation, housing, and canteen. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>13. Freedom of Association and Collective Bargaining</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitment to freedom of association and collective bargaining as publicly communicated through public reporting and policies, such as the Code of Conduct and Human Rights Policy and the Supplier Code of Conduct. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected ERG's Collective Bargaining Agreement in place as established with the different union representatives. - Inspected union meetings to demonstrate the regular engagement with the union representatives. - Inspected HSE Committee meeting minutes to demonstrate the involvement of unions in the site's ESG matters. - Inspected and performed sample testing of 16 employee contracts and inspected the relevant employment terms included. - Inspected the management practices by inspecting relevant human resources policies, procedures, and processes in place. Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over freedom of association and collective bargaining. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of freedom of association and collective bargaining commitments and how they
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		<p>are implemented through the Company's management systems and related policies, procedures and processes.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>14. Non-Discrimination and Harassment</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitment to non-discrimination and harassment as publicly communicated through public reporting and policies, such as the Code of Conduct, Human Rights Policy, and the Supplier Code of Conduct. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected the management practices by inspecting policies, procedures, and processes in place. - Inspected the grievance register to obtain an understanding of how and which types of grievances have been recorded. <p>Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated and mitigated through actions and engagement with the person voicing the grievance. Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings.</p> <ul style="list-style-type: none"> - Inspected social performance data related to workforce demographics, broken down by gender. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over non-discrimination and harassment. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of non-discrimination and harassment commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks
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		<p>relevant to Metalkol and its operations.</p> <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed and engaged during the plant tour with workers to obtain an understanding of the well-being and employment conditions, including non-discrimination and harassment management practices. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>15. Diversity, Equity, and Inclusion</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitment to diversity, equity and inclusion as publicly communicated through public reporting and policies, such as the Code of Conduct and the Equity, Diversity and Localisation Policy. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected the human resources management practices, including recruitment and talent management, by inspecting policies, procedures and processes in place with regards to diversity, equity and inclusion. - Inspected Metalkol's monitoring of the workforce to obtain an understanding of how Metalkol tracks the evolution of the components of its workforce towards improved diversity. - Inspected Metalkol's Collective Bargaining Agreement and union meeting minutes to obtain an understanding of how Metalkol ensures equality and equity across its workforce, in collaboration with the union representative. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected grievance register to obtain and understanding whether grievances related to diversity, equity and inclusion have been received and mitigated. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over diversity, equity, and inclusion. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:20 - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of diversity, equity, and inclusion commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. This included considerations of how Metalkol engages specifically with women from local communities on relevant topics through the
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		<p>Community Women Committee meetings.</p> <ul style="list-style-type: none">- Conducted an interview with representatives of Metalkol's Women's Committee to obtain an understanding of the diversity, equity, and inclusion initiatives in place to support women as group of key affected stakeholders in the workforce.- Conducted an interview with the representative of the external Local Procurement Committee to obtain an understanding of their collaboration with Metalkol to recruit from the diverse local ethnic communities across the Lualaba province.- Conducted interviews with key stakeholders, including employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed and engaged during the plant tour with workers to obtain an understanding of the well-being and employment conditions, including diversity, equity, and inclusion management practices. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>16. Employment Terms</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitment to respecting employment terms, as publicly communicated through public reporting and policies, such as the Code of Conduct, Supplier Code of Conduct, and the Human Rights Policy. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, and UNGP. Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks (such as but not limited to working hours, remuneration, social benefits, housing ...). - Inspected human resources policies, procedures, processes in place, such as related to working hours, including overtime, and remuneration, to obtain an understanding of the management practices in place related to employment terms (such as but not limited to working hours, remuneration, social benefits, housing ...). - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 - Inspected Metalkol's Collective Bargaining Agreement in place to obtain an understanding of how employment terms have been defined in consideration of the regulatory requirements for working conditions and in collaboration with the different union representatives. - Inspected Metalkol's wage benchmarking exercise against national regulatory requirements & benchmarks for minimum wage. - Inspected Metalkol's living wage analysis based on the Anker Living Income Reference Value. - Inspected union meeting minutes to demonstrate Metalkol's regular engagement with the union representatives. - Inspected HSE Committee meeting minutes to demonstrate the involvement of unions in the site's ESG matters. - Inspected and performed sample testing of 16 employee contracts and inspected the relevant employment terms included - Inspected and performed sample testing of 16 employee records and inspected working hours and remuneration practices, to test that the remuneration exceeds the national minimum wage requirements and the living wage, as defined by the Anker Living Income Reference Value. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded.
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		<ul style="list-style-type: none"> - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over employment terms. - Inspected Metalkol's initiatives to ensure compliance with labour regulatory requirements by reviewing documentation exhibiting Metalkol's submission to regulatory inspections undertaken. This includes considerations of labour inspections performed by the authorities. - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of employment and workforce related commitments and how they are implemented through the Company's management systems and related policies, procedures and processes (such as but not limited to working hours, remuneration, social benefits, housing ...). - Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations (such as but not limited to working hours, remuneration, social benefits, housing ...). <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed and engaged during the plant tour with workers to obtain an understanding of the well-being and employment conditions. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>17. Occupational Health and Safety</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. This included considerations over action plans to address identified risks. - Inspected Metalkol's commitment to managing occupational health and safety, as publicly communicated through public reporting and policies, such as the Code of Conduct and the Human Rights Policy. - Inspected the Safety Health and Sustainability Management System Manual which outlines the roles and responsibilities defined for the health and safety function. This includes amongst others, the Safety Health and Sustainability Manager, the ERG Sustainability Committee, the Metalkol ESG-HR Working Group, and the Metalkol Sustainability/EHS Committee. - Inspected the management practices by inspecting policies, procedures and processes in place, such as occupational health and safety records and reporting to management. Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of training. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated and mitigated through actions and engagement with the person voicing the grievance. - Inspected how Metalkol monitors and reports to management and to the authorities on key health and safety indicators to achieve its zero-harm objective. - Inspected the IsoMetrix database and a sample of 16 incidents reports, to obtain an understanding of how Metalkol monitors, manages and assesses health and safety hazards and incident records. This included incident tracking and corrective actions, amongst others. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are
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		<p>publicly reported on, including over occupational health & safety.</p> <ul style="list-style-type: none">- Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 <p>Interviews conducted:</p> <ul style="list-style-type: none">- Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of occupational health and safety commitments and how they are implemented through the Company's management systems and related policies, procedures and processes.- Conducted interviews with key stakeholders, including with employees, contractors and union representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the occupational health and safety management practices, such as through signs, posters, workplace safety measures, including medical facilities.- Observed and engaged during the plant tour with workers to obtain an understanding of the occupational health and safety conditions, awareness from trainings and appropriateness of personal protective equipment.- Participated during the site visit to the Occupational Health & Safety training module relevant to site visitors. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>18. Emergency Preparedness</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices related to emergency preparedness as outlined in the Safety Health and Sustainability management system, by inspecting key policies, procedures and processes. This includes Metalkol's Emergency Response Management Plan and ERG Africa's Emergency Management System Procedure. - Inspected Metalkol's Emergency Response Management Plan to obtain an understanding of the defined emergency response scenarios, including specific emergency response actions. This includes considerations of community integration with regards to emergency preparedness and response - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. This included considerations over action plans to address identified risks. - Inspected the management practices through inspecting emergency risk assessment, incidence records, reporting to management, training records. - Inspected meeting minutes and presentations demonstrating how Metalkol engages with stakeholders on identified risks and how resulting input contribute to the development of the related action plans. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over emergency preparedness. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015 - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group
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		<p>management representatives, to obtain an understanding of their awareness of emergency preparedness commitments and how they are implemented through the Company's management systems and related policies, procedures and processes.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant and community tour the emergency preparedness management practices, such as through signs, posters, workplace safety measures, medical and fire station facilities.- Participated during the site visit in an emergency exercise and observed the awareness and application of the emergency preparedness procedures and processes by the employees and workers. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>19. Community Health and Safety</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices related to community health and safety as outlined in the Safety Health and Sustainability management system, by inspecting key policies, procedures and processes. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected the management practices through inspecting risk assessments, documentation of community health and safety activities, reporting to management. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over community health & safety. - Inspected ongoing process to obtain certification for the occupational health and safety management system in line with ISO 45001:2018 and the environmental management system in line with ISO 14001:2015. - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of community health and safety commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks
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		<p>relevant to Metalkol and its operations.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with NGO representatives and academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations, including community health and safety. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant and community tour the community health management practices, such as through signs, posters, fencing of operational areas, solar powered water pumps at the water borehole stations for communities. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the “Opinion” paragraph of the reasonable assurance report.</p>
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<p>20. Community Development</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices related to community development, as managed by the SHEC management system by inspecting key policies, procedures and processes. - Inspected the management practices through inspecting the Community Commitment Register, 0.3% contribution to community development, community development projects, reporting to management, payments made and public reporting. - Inspected the Community Commitment Register to obtain an understanding how funds are allocated to community development projects across the different communities, demonstrating how investment decisions are made & budgets are set up. - Inspected the 0.3% contribution to community development to obtain an understanding of how Metalkol provisions and invests in the 0.3% fund to comply with regulatory community investments requirements. - Inspected documentation of community engagement practices, such as the engagement with local communities and meeting minutes and the resettlement practices of Samukonga community. - Inspected the grievance register to obtain an understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over community development. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of community development commitments and how they are implemented through the Company's management systems and related policies, procedures and processes, such as through local recruitment for staff, local procurement practices, community women committees, medical benefits, compensation practices, and partnerships with the local community, government, NGOs. - Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. - Conducted interviews with key stakeholders, including with NGO
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		<p>representatives and authorities, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations, including community development.</p> <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the community tour the community development activities, such as through visiting constructions sites and existing development projects.- Visited the resettled community of Samukonga to engage with the community and obtain an understanding of their livelihood, wellbeing, and related community development activities by Metalkol. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the “Opinion” paragraph of the reasonable assurance report.</p>
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21. Artisanal and Small-Scale Mining	Fully Meets	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices related to artisanal and small-scale mining, as managed through operational, community and security policies, procedures and processes, seeing ASM is only present within the vicinity of Metalkol's operations. Inspected the management practices to map and monitor artisanal and small-scale mining activities by inspecting risk assessments, monitoring reports, and management reporting practices. - Performed review analytics on Metalkol's historic and current production and export volumes to inspect the stability of volumes on a monthly and yearly basis with regards to the production capacity of the site. - Inspected the chain of custody procedures to obtain an understanding of how Metalkol has designed the site's operational processes for the sole purpose to allow the processing tailings materials. - Inspected Metalkol's RIM RMAP assessment report and certification to obtain an understanding how Metalkol demonstrates compliance with the RIM RMAP requirements, including considerations over ASM. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of ASM management commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. - Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant and community tour artisanal and small-scale mining activities that exist in the vicinity of the Metalkol concession and the impact on local communities and Metalkol's operations. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>22. Security & Human Rights</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's commitments as publicly communicated through public reporting and policies, such as the Human Rights Policy and the ERG Code of Conduct. This includes considerations of international human rights and fundamental freedoms conventions, such as the UN Universal Declaration of Human Rights, ILO conventions, VPSHR and UNGP. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected Metalkol's RIM RMAP assessment report and certification, ERG's CAHRA procedure and assessment to obtain an understanding how Metalkol assesses and accounts for the risks related to its raw material sourcing as located in a CAHRA country. - Inspected the management practices to related to security and human rights, such as the implementation of the Voluntary Principles of Security and Human Rights, Metalkol's 12 Golden Rules for Security, and the inspection of risk assessments, monitoring reports, supplier audits of security contractors and management reporting practices (inspecting their membership with the Responsible Security Association (ICoCA)). - Inspected key training materials to understand how requirements related to this Copper Mark Criteria as embedded in the site's policies and procedures are communicated. - Inquired about the management practices related to the training of relevant stakeholders for this Copper Mark Criteria, including considerations over training records in view of the occurrence of trainings. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over pollution. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group
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		<p>management representatives, to obtain an understanding of their awareness of security related human rights commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes, including Metalkol's cooperation with DCAF and Justicia.</p> <ul style="list-style-type: none"> - Conducted interviews with key stakeholders, including with Metalkol's Community Liaison Officers, contractors for private security services, representatives from the local public policy force, community members, Human Rights NGO representatives and employees to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant and community tour the security and human rights related management practices, such as access rights management, fencing, security stations, security process. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>23. Indigenous Peoples' Rights</p>	<p>Not Applicable</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices, by inspecting key policies such as the ERG Human Rights Policy as well as the ERGA Sustainable Exploration Policy to obtain an understanding of commitments in view of indigenous rights and identifying their presence. - Inspected public records related to indigenous people in the Democratic Republic of the Congo, including DRC's department for environment & sustainable development's Community Forest database to obtain an understanding on DRC's regulatory requirements on indigenous people rights and where areas of presence of indigenous people have been legally defined, - Inspected the regulatory required and approved Metalkol Environmental and Social Impact Assessment (ESIA) and Metalkol ESIA Archaeological Report, performed with the involvement of local experts, as well as Metalkol risk assessment to obtain an understanding of how the local communities and related risks have been identified and assessed. This includes considerations of the identification of indigenous people. - Inspected Metalkol's assessment and supporting evidence of how Metalkol concluded that no indigenous people have been identified in the area of influence and how Metalkol concluded that the Copper Mark Criteria is not applicable. - Inspected Metalkol's engagement with local communities, the stakeholder engagement plan, and underlying records of stakeholder engagement practices to obtain an understanding of how Metalkol engages with affected stakeholders in identifying related risks. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of indigenous people commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations.
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		<p>Onsite observation:</p> <ul style="list-style-type: none">- Observed and engaged during the community tour with the local communities to obtain an understanding of the locally present communities. <p>The performance determination of Not Applicable for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>24. Land Acquisition & Resettlement</p>	<p>Fully Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices related to land acquisition and resettlement, such as the Human Rights Policy, as well as land acquisition and resettlement related policies, procedures and processes - Inspected the documentation of the resettlement process of the Samukonga community, including the engagement process, meeting minutes and community development activities. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over land acquisition and resettlement. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of land acquisition and resettlement commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with community members and NGO representatives to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the community tour the community development activities, such as through visiting constructions sites and existing development projects. - Visited the resettled community of Samukonga to engage with the community and obtain an understanding of their livelihood, wellbeing, and related community development activities by Metalkol. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>25. Cultural Heritage</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices related to cultural heritage, such as the ERG Human Rights Policy and the ERGA Sustainable Exploration Policy as well as cultural heritage related policies, procedures and processes, including Metalkol's Cultural Heritage Monitoring procedure, to obtain an understanding of commitments in view of identifying, mapping, monitoring and managing cultural heritages sites and related risks. - Inspected the regulatory required and approved Metalkol Environmental and Social Impact Assessment (ESIA) and Metalkol ESIA Archaeological Report, performed with the involvement of local experts, the ERG Double Materiality Assessment, the ERG Enterprise Risk Management Assessment as well as Metalkol risk assessment to obtain an understanding of how cultural heritage sites and related risks have been identified and assessed. This included considerations over action plans to address identified risks. - Inspected cultural heritage monitoring reports to obtain an understanding of how Metalkol monitors and manages cultural heritage sites, including actions undertaken to maintain and preserve the mapped sites. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected a sample of 5 grievances, to obtain an understanding of how grievances are identified, processed, investigated, and mitigated through actions and engagement with the person voicing the grievance. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over cultural heritage. - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of cultural heritage commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with employees, contractors and community members to obtain an understanding of their awareness of policies, procedures and processes in place, including of measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations.
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		<p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant and community tour the management practices to protect cultural heritage sites. This includes considerations of the maintenance and use state of cultural heritage sites, such as cemeteries and sacred trees. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>26. Climate Action</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management commitments regarding climate change as outlined in the ERG Group Climate Change Impact and Adaptation Management Policy - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected underlying documentation related to climate targets, and action plans, including Metalkol's GHG Reduction Roadmap, LCA assessments, and ongoing partnerships with third-parties to enhance its climate change and GHG emissions reductions management practices. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over climate action. - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of climate action commitments and how they are implemented through the Company's management systems and related policies, procedures and processes. - Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant tour the management practices to mitigate and adapt to climate related impacts. This includes, among others, the watering of the increasingly arid roads to prevent dust pollution related to transportation. <p>The performance determination of Partially Meets for this Criterion has been</p>
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		<p>prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>27. Greenhouse Gas Emissions Reductions</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding greenhouse gas emission monitoring, by inspecting relevant policies, procedures and processes, including the ERG Climate Change Policy and the Metalkol GHG reporting procedure. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected underlying documentation related to Metalkol's GHG emissions assessment and data collection processes, such as life cycle assessments and carbon footprint calculations, monitoring practices, and reporting practices to management. - Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over climate change and reporting on GHG emissions. - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of climate action and GHG emissions reduction commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. This includes considerations over energy efficiency projects, development of performance targets and progress on emissions reduction efforts. - Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations.
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		<p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the management practices to GHG impacts, such as through operational measurement points of emissions. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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28. Water Stewardship	Partially Meets	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding water stewardship, by inspecting related policies, procedures and processes, including Metalkol's Water Monitoring procedure. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected water monitoring reports and lab analysis reports to obtain an understanding of how Metalkol manages and monitors water stewardship parameters against standard thresholds, including water quality. - Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on water stewardship parameters to relevant stakeholders, including management, authorities, and community members. - Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to water stewardship. Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over water stewardship. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of
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		<p>water stewardship commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with academia and NGO representatives, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the management practices to water stewardship impacts including related to wastewater management, such as through operational measurement points of for water quality, water usage, overflow areas, local water bodies including rivers.- Observed during the plant tour Metalkol's closed loop water system, acid spill basin and water treatment facilities to obtain an understanding of how Metalkol prevents direct wastewater releases in the environment and avoids extensive reliance on areas under water stress in view of water consumption. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>29. Waste Management</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding waste management, by inspecting relevant policies, procedures and processes, including Metalkol's Waste Management Procedure, Non-Mineral Waste Procedure and underlying chemicals, acids & hydrocarbon handling procedures. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This includes considerations of the Metalkol External and internal Traffic Risk Assessment in view of transportation risks as well as action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected hazardous and non-hazardous waste management and monitoring reports to obtain an understanding of how Metalkol manages and monitors waste parameters. - Inspected non-hazardous and hazardous waste management procedures, including considerations of waste related to chemicals, acids hydrocarbon and other non-mineral resources used, to obtain an understanding of how Metalkol handles and transports waste. - Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on waste parameters to relevant stakeholders, including management, authorities, and community members. - Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to waste management. - Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over waste management. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015.
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		<p>Interviews conducted:</p> <ul style="list-style-type: none">- Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of waste management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes.- Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the management practices to waste management, such as waste collection points, on site landfill, sewage treatment plant. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>30. Circular Economy</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding circular economy, by inspecting relevant policies, procedures and processes, including Metalkol's Cobalt and Copper Chain of Custody Procedures, outlining Metalkol's operating model based on the reprocessing of tailings waste - This included considerations over action plans to address identified risks. Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected underlying documentation, such as waste recycling and tailing reprocessing data, key actions points, preliminary circular economy targets, and reporting practices to management. - Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on waste parameters and tailings processing to relevant stakeholders, including management, authorities, and community members. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over circular economy. - Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. - Inquired about the management practices related to the onboarding training and induction process, including considerations over the existence of training materials and training records in view of the occurrence of trainings. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of circular economy commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. - Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant tour the management practices to manage
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		<p>waste, including waste collection points as well as circularity initiatives implemented.</p> <ul style="list-style-type: none">- Observed during the plant tour the management practices to manage water resources, including the closed loop water management system and the sewage treating facility- Observed during the plant tour the tailings processing facilities, including the tailings storage facility, the operating plant, and the residue storage facility. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>31. Tailings Management</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding tailings management, by inspecting Metalkol's policies, procedures, and processes in place, including external audit reports. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. - Inspected underlying documentation, such as monitoring reports, third party inspections, and reporting practices to management regarding tailings management as well as action plan in place to align the management practices with the GISTM certification requirements. - Performed review analytics on Metalkol's historic and current production and export volumes to inspect the stability of volumes on a monthly and yearly basis with regards to the production capacity of the site. - Inspected the chain of custody procedures to obtain an understanding of how Metalkol has designed the site's operational processes for the sole purpose to allow the processing tailings materials. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of tailings management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. - Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none"> - Observed during the plant tour the tailing extraction and tailing storage facilities and obtained an understanding of the management practices in place to manage the tailings, such as through monitoring points, fencing the operational areas and reclamation activities. - Observed during the plant tour the management practices to manage tailing water, including the impact on the tailings management on the overall water management.
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		<p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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<p>32. Biodiversity and Productive Land</p>	<p>Partially Meets</p>	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding biodiversity and productive land, by inspecting Metalkol's policies, procedures and processes in place, including the latest Biodiversity Management Plan which is being finalised. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected the Metalkol Environmental and Social Impact Assessment (ESIA) to obtain an understanding of the operational business practices, the identified impacts and mitigation measures. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. Inspected underlying documentation, such as biodiversity monitoring reports, third party biodiversity assessments, and reporting practices to management. - Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on environmental parameters to relevant stakeholders, including management, authorities, and community members. - Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over biodiversity. - Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. - Inquired about the management practices related to the training of workers and contractors for this Copper Mark Criteria, including considerations over the existence of training materials and training records in view of the occurrence of trainings <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of biodiversity commitments and how they are implemented through the Company's management systems and related policies, procedures, and
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		<p>processes.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with academia to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations, including biodiversity rehabilitation. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour and community tour the flora and fauna in and around the concession and the management practices in place to address the impact of operational activities (from extraction, production, tailing storage to transportation) on biodiversity and productive land, including the ongoing collaboration with the University of Lubumbashi on the site's biodiversity conservation and rehabilitation. <p>The performance determination of Partially Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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33. Pollution	Fully Meets	<p>To obtain reasonable assurance on ERG Metalkol's Copper Mark self-assessment (the Subject Matter Information) in accordance with the criteria set out in The Copper Mark Risk Readiness Assessment Criteria Guide, Version 3.0 (the Criteria), the following procedures were performed (but not limited to), which included assessing the implementation of policies and procedures:</p> <p>Types of documents reviewed:</p> <ul style="list-style-type: none"> - Inspected Metalkol's management practices regarding pollution, by inspecting Metalkol's Pollution Management Plan and related policies, procedures, and processes in place. - Inspected the ERG Enterprise Risk Management Assessment, Metalkol's ESG and Human Rights risk assessment and ERG Group's Double Materiality assessment to assess how material ESG issues, risks and impacts related to this Copper Mark Criteria are identified. This included considerations over action plans to address identified risks. - Inspected relevant annual, quarterly, and monthly key management reports and meeting minutes where identified risks, action plans, risk mitigation, and effectiveness of procedures and processes are discussed. - Inspected environmental monitoring reports, meeting minutes and presentations, to obtain an understanding of how Metalkol communicates on pollution parameters to relevant stakeholders, including management, authorities, and community members. This includes considerations over air quality emissions and water quality parameters. - Inspected the regulatory required environmental and social bi-annual third-party audit report to obtain an understanding of how Metalkol performs independent assessments of its social and environmental impacts to comply with regulatory requirements. - Inspected a sample of 16 incidents reports and 5 grievances, to obtain an understanding of how incidents and grievances are identified, processed, investigated, and mitigated, including related to pollution. - Inspected Metalkol's Clean Cobalt and Copper Performance Report, ERG Group's Sustainable Development Report and ERG Africa's DRC Annual Integrated Report to obtain an understanding of how material ESG matters are publicly reported on, including over pollution. - Inspected the grievance register to obtain and understanding how and which types of grievances have been recorded. - Inspected ongoing process to obtain certification for the environmental management system in line with ISO 14001:2015. <p>Interviews conducted:</p> <ul style="list-style-type: none"> - Conducted interviews with Metalkol and ERG corporate group management representatives, to obtain an understanding of their awareness of pollution management commitments and how they are implemented through the Company's management systems and related policies, procedures, and processes. - Conducted interviews with key stakeholders, including with employees, contractors, and community members to obtain an understanding of their awareness of policies, procedures, and processes in place, including of
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		<p>measures for escalating concerns, resolving grievances, and addressing risks relevant to Metalkol and its operations.</p> <ul style="list-style-type: none">- Conducted interviews with key stakeholders, including with academia, to obtain an understanding of how they are engaged with to address and manage material ESG matters relevant to Metalkol and its operations. <p>Onsite observation:</p> <ul style="list-style-type: none">- Observed during the plant tour the management practices related to pollution management, such as through operational measurement points of for various pollutions, personal protective equipment of personal, process safety measures and dust suppression measures. <p>The performance determination of Fully Meets for this Criterion has been prepared, in all material aspects, in accordance with the applicable criteria, as confirmed in the "Opinion" paragraph of the reasonable assurance report.</p>
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