



BUBALUS RESOURCES LIMITED
ACN 654 970 751
(Company)

ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

1. Introduction

Bubalus Resources Limited (ACN 654 970 751) (**Company**) is committed to the sustainable discovery, development and production of mineral resources/rare earth and lithium. As a responsible exploration and development company, the Company must identify, assess and report responses to environment, climate change and social challenges. The Company acknowledges that it has a role to play in protecting the natural environment, reducing global greenhouse gas emissions and to improving people's lives now and for generations to come.

This environmental, social and governance policy (**ESG Policy**) regulates and provides guidance to the Company's management of activities to minimise adverse work force community or environmental impacts.

The Board has delegated to the ESG Committee responsibility for implementing the ESG management system.

1.1 Purpose

A strong environmental, social and governance performance is essential to the success and growth of the Company's business. The Company's directors recognise the need to identify and address the risks to the Company's ability to meet its obligations to the community and the environment. The Company recognises the need to identify and address the risks to the Company's ability to meet its obligations to the community and the environment.

The Company is committed to managing its activities to minimise adverse work force community or environmental impacts.

1.2 Governing principles

(a) **General governance principles**

The Company will achieve this by:

- (i) implementing a systematic approach to ESG risk management;
- (ii) complying with and exceeding all relevant laws and regulations and applying responsible industry standards where laws do not exist;
- (iii) setting, measuring and reviewing objectives and targets that will drive continuous improvement in ESG performance;
- (iv) embedding ESG considerations in the Company's business planning and decision making processes;



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- (v) integrating ESG requirements when designing, purchasing, constructing and modifying equipment and facilities;
- (vi) reviewing the ESG contingency planning process to ensure high risk activities identified in the ESG risk management have appropriate contingency plans in place;
- (vii) maintaining a culture in which stakeholders are aware of their ESG obligations and are empowered to intervene on ESG issues;
- (viii) providing continued education to all stakeholders to identify and act upon opportunities to improve the ESG performance;
- (ix) undertaking and supporting research to gain better understanding of ESG and using scientific approach to support impact assessments and evidence based decision making;
- (x) taking a collaborative and pro-active approach with our stakeholders; and
- (xi) requiring directors, contractors and employees to comply with our ESG expectations in a mutually beneficial manner.

(b) Environment

In relation to the environment, the Company will:

- (i) ensure that, as a minimum, all policies and procedures comply with all applicable environmental laws and regulations, assessment and approval requirements, licences and conditions;
- (ii) commit to operate all business unit's sustainably by:
 - (A) identifying, mitigating, managing and reporting on material environmental risks and impacts associated with the business unit's activities;
 - (B) planning and implementing strategies to effectively manage and reduce key environmental risks and impacts such as greenhouse gas emissions, water management and waste reduction with the focus on reducing the Company's environmental footprint;
 - (C) where relevant, protecting and respecting natural systems and associated biodiversity in areas where the Company operates;



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(D) efficiently using water and energy and maximising the value of existing resources;

(E) integrating mine closure and progressive rehabilitation into the life-cycle of the Company's operations to minimise its environmental legacies;

encouraging environmentally responsible actions and behaviours including supporting the use of materials that are safe, recycled or reused.

(iii) inform employees, customers and suppliers about this Policy and require compliance with such expectations as well as considering environmental performance of potential suppliers in decision-making;

(iv) strive to improve environmental performance based on defined objectives and targets for monitoring, measuring and reporting performance; and

(v) report openly, honestly and in a timely manner to stakeholders on the Company's environmental and sustainability performance.

(c) Climate change

The Company will:

(i) take action to appropriately identify and manage climate change risks and opportunities, consistent with the objective to sustainably deliver superior returns to shareholders;

(ii) seek opportunities to better understand the life-cycle of greenhouse gas emissions (**GHG**) for the mineral resources/rare earth and lithium value chains;

(iii) seek to increase the transparency of the Company's climate change reporting of performance metrics and targets to meet the needs of all stakeholders including shareholders, governments, lenders, insurers, customers and communities;

(iv) report the Company's energy use, Scope 1 and Scope 2 GHG emissions against the Company's annual targets.

(v) ensure that measuring, reporting and verification processes are robust across all operating sites;

(vi) pro-actively assess options to increase the use of renewable power and lower emission energy technologies to reduce the Company's GHG emissions intensity;



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- (vii) focus on opportunities to improve energy efficiency to reduce energy used and reduce direct mining costs;
- (viii) identify and pursue best practices in the mining and metals industry and party with technology developers to explore new opportunities for mineral resources/rare earth and lithium extraction and processing in the transition to a low carbon future;
- (ix) continue to assess climate change scenarios and projected future energy prices in medium and long term analysis to ensure that the cost of carbon informs business decision; and
- (x) partner with or engage experts and research organisations to identify potential physical threats of climate change at current and planned operating sites and invest in appropriate adaption responses to build resilience.

(d) **Social**

The Company will:

- (i) provide and maintain a safe workplace so that its employees, contractors and visitors go home safe and well;
- (ii) identify and manage risks, impacts and opportunities within our operations and host communities;
- (iii) be responsible stewards of the commodities the Company extracts and the natural resources used while promoting enduring environmental, social and economic benefits;
- (iv) create shared value with the Company's stakeholders and deliver sustainable and long-term benefits in a manner that supports and respects the rights and aspirations of the communities in which the Company operates;
- (v) respect and promote human rights and will not engage in or condone forced or compulsory labour or other forms of modern slavery and will work to ensure these are not present in the Company's supply chain;
- (vi) recognise and honour the cultural heritage, customs and traditions of all indigenous peoples touched by the Company's activities; and
- (vii) uphold ethical business practices and comply with all legal requirements in all jurisdictions in which the Company operates.



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1.3 Application

Responsibility for the application of this policy rests with, but not limited to, all Company employees and contractors engaged in activities under the Company's operational control.

Each department of the Company is responsible for the development of its own internal policies to implement the principles set out in section 1.2 above (**Department Policy**).

The Company's managers are also responsible for promotion the ESG and Department Policy.

1.4 Monitoring and review

- (a) Material breaches of this ESG Policy will be reported to the Company's board of directors (**Board**) or a committee of the Board.
- (b) The Board will monitor the content, effectiveness and implementation of this ESG Policy on a regular basis. There may also be independent reviews taken from time to time. Any findings, updates or improvements identified will be addressed as soon as possible.
- (c) Personnel are invited to comment on this ESG Policy and suggest ways in which it may be improved. Comments, suggestions and queries should be addressed to the Board.