TECHMET LIMITED
ENVIRONMENT, SOCIAL AND GOVERNANCE POLICY
Adopted by the board of directors on 16 December 2022
For review next on 1 December 2023 or when required
1

#### Introduction

TechMet is a private investment company building mining, processing and recycling projects that produce technology metals critical to the global energy transition and mass adoption of electric vehicles.

We believe that businesses involved in the transition should be environmentally and socially responsible and must contribute positively to the societies in which they operate. Strong environmental, social and governance practices are critical to TechMet's mission. They inform our investment decisions and drive the way we add value to our portfolio companies.

#### Our Framework

In accordance with our beliefs and our commitments to the US International Development Finance Corporation's Environmental and Social Policies and Procedures, where applicable, we work to bring all our investee companies into compliance with the following standards:

- the IFC Performance Standards on Social and Environmental Sustainability (2012);
- the IFC Environmental, Health, and Safety General Guidelines (2007);
- the IFC Environmental, Health, and Safety Guidelines for Mining (2007);
- the Workers' accommodation: processes and standards a guidance note by IFC and EBRD (August 2009).
- and all applicable ILO Conventions.

# **Implementation**

#### **Pre-investment:**

ESG considerations inform how TechMet make investment decisions. We do this by ensuring:

- We fully understand the ESG risks and opportunities that an investment may carry prior to making investment decisions;
- Companies commit to implement suitable ESG standards and programmes prior to investment;
- Companies are compliant with all applicable national and international laws and regulations; and,
- We do not make an investment if a company's activities fall within our Exclusion Criteria. (See Annexe A).

## **Investment Tenure:**

We work in partnership with our portfolio companies to enhance their ability to achieve strong environmental, social and governance outcomes by:

- Assessing current ESG capacity and performance against the standards to which we are committed, and work together to develop plans to improve ESG performance over time;
- Building their capacity to better manage ESG risks and exploit ESG opportunities through the development of fit-for-purpose management systems and processes; and,
- Working with portfolio companies to reduce their direct and indirect greenhouse gas emissions, and encourage them to work with other organisations, governments and groups to address climate change.

We use a risk-based approach to allocate resources to investments where we believe there to be a higher chance of an ESG incident occurring.

The CEO has the ultimate responsibility for ensuring this ESG policy is enacted. The Head of ESG is responsible for leading its implementation within TechMet and across the portfolio.

We will monitor our own activities and the advances of our portfolio companies, and report on progress to our shareholders on an annual basis.

### Annexe A- Exclusion Criteria

TechMet has developed an internal exclusion list based on the IFC Exclusions List (2007). The activities listed below define the types of activities that the Head of ESG will advise against financing. These include the following:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, polychlorinated biphenyls ("PCBs"), wildlife or products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES").
- Production or trade in weapons and munitions.
- Production or trade in alcoholic beverages.
- Production or trade in tobacco.
- Gambling, casinos and equivalent enterprises.
- Production or trade in unbonded asbestos fibres. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.
- Cross-border trade in waste and waste products, unless compliant with the Basel Convention and the underlying regulations.
- Destruction of High Conservation Value areas.
- Pornography and/or prostitution.
- Racist and/or anti-democratic media.
- Companies with a history of alleged or confirmed Human Rights abuses, including allegations of child labour.