

**KAROWE DIAMOND MINE
GISTM Public Disclosure Report
2025**

DISCLAIMER

This Public Disclosure Report has been prepared in accordance with the Global Industry Standard on Tailings Management (GISTM, 2020) and reflects information available as of August 2025. While every effort has been made to ensure the accuracy, completeness, and reliability of the information contained herein, the report is provided for transparency purposes only and does not constitute legal, financial, or technical advice.

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For further details on tailings management governance, monitoring, and updates beyond this reporting period, stakeholders are referred to:

<https://lucaradiamond.com/sustainability/sustainability-reports/>

ABBREVIATIONS

Acronyms	Description
ADPR	Annual Dam Performance Report
AE	Accountable Executive
ALARP	As Low As Reasonably Practicable
BOBS	Botswana Bureau of Standards
BOS	Botswana Standards
CAP	Chapter
CCS	Consequence Classification of Structures
CRD	Course Residue Deposits/Dump
DSR	Dam Safety Review
EoR	Engineer of Record
EMP	Environmental Management Plan
EPRP	Emergency Preparedness and Response Plan
FRD	Fines Residue Deposits/Dam
GISTM	Global Industry Standard for Tailings Management
GRI	Global Reporting Initiative
ICMM	International Council on Mining And Metals
KDM	Karowe Diamond Mine
LoM	Life of Mine
LoP	Life of Open Pit
Mamsl	Meters above mean sea level
MRD	Mineral residue deposits
MRF	Mineral residue facilities
OMS	Operations, Maintenance and Surveillance Manual
PFMEA	Potential Failure Mode and Effect Analysis
RTFE	Responsible Tailings Facility Engineer
SASB	Sustainability Accounting Standards Board
TSF	Tailings Storage Facilities
UNGP	United Nations Guiding Principles

1 Introduction

Lucara Botswana (PTY) Ltd., is an indirect, wholly owned subsidiary of the Canadian parent company, Lucara Diamond Corp., and it owns and operates the Karowe Diamond Mine in Botswana.

Lucara Botswana is committed to implementing international standards in order to shape a sustainable future. Lucara Botswana is a participant of the UN Global Compact and has adopted the IFC Performance Standards and the Mining Association of Canada's Towards Sustainable Mining standard. As part of this mission, Lucara Botswana has embraced the adoption of Global Industry Standard on Tailings Management (GISTM), a pivotal stride towards ensuring the safe and sustainable management of tailings facilities. With a resolute focus on the well-being of both local communities and the environment, Lucara Botswana's adoption of GISTM resonates with responsible mining at the Karowe Diamond Mine site.

Embodying the true essence of sustainable development, Lucara Botswana's adherence to the GISTM seamlessly integrates with its broader strategy of community-centric engagement. Beyond the technical realm, this commitment serves as a testament to Lucara Botswana's role as a steward of both the environment and the well-being of local communities. By embracing the GISTM standard and prioritizing the safe and sustainable management of tailings, Lucara Botswana demonstrates its resolve to drive positive change and uplift the very fabric of the regions it operates in. Through the GISTM, Lucara Botswana's narrative unfolds as a beacon of responsible mining, where best practices not only redefine industry norms but also empower the aspirations of a sustainable future.

GISTM mandated that all tailings facilities rated “Very High” or “Extreme” as per the standard's consequence classification criteria should demonstrate conformance by August 2023 and all other tailings facility by August 2025. This applies to ICMC members and non-members who undertake the implementation of the GISTM standard. Lucara Botswana has three facilities in its operations at Karowe Diamond Mine that meet this criterion for conformance. The slimes dam facilities (FRD 1 and FRD 2) are classified as “Very High” and “High,” respectively. The CRD facility is classified as “High.” Thus, these tailings storage facilities are the subject of this report. The level of conformance with the GISTM is documented in the GISTM Self-Assessment Reports.

1.1 Public Disclosure Scope

This document is prepared in conformance with Principle 15, Requirement 15B and 15 C of the GISTM.

PRINCIPLE 15:

Publicly disclose and provide access to information about the tailings facility to support public accountability.

REQUIREMENT 15.1

- A. *“For new tailings facilities for which the regulatory authorisation process has commenced, or*

that are otherwise approved by the Operator, the Operator shall publish and update, in accordance with Principle 21 of the UNGP...,

Requirement 15.1 A is not applicable as this is an existing facility.

- B. *"For each existing tailings facility and in accordance with Principle 21 of the UNGP, the Operator shall publish and update at least on an annual basis...,*
- C. *"Provide local authorities and emergency services with sufficient information derived from the breach analysis to enable effective disaster management planning (Information may be obtained from the output of Requirement 2.3)"*

2 Overview Of Karowe Diamond Mine

2.1 Karowe Diamond Mine Description

KDM is owned and operated by Lucara Diamond Corporation. The diamond mine was fully commissioned in 2012; it is 100% owned by Lucara Botswana Proprietary Limited and is currently operated as an open pit mine, with plans set for 2028 to transition to underground mining until the mine's expected life, which is projected to extend into the early 2040s.

2.2 Locality

KDM is located in the Boteti District, 20 kilometres south and south-west of Orapa and Letlhakane settlements respectively. Geographical, it is sited at 25° 28' 13" E and 21° 30' 35" S. Figure 1 presents an aerial view of the KDM relative to Orapa and Letlhakane villages.

This site is accessible by a gravel road from Letlhakane, and its lease area is approximately 1523 ha and includes a demarcating fence surrounding the Mine that falls within the lease area. The fence is 500m away from the lease boundary. The KDM mine can also be accessed through a gravel airstrip of 1500m.

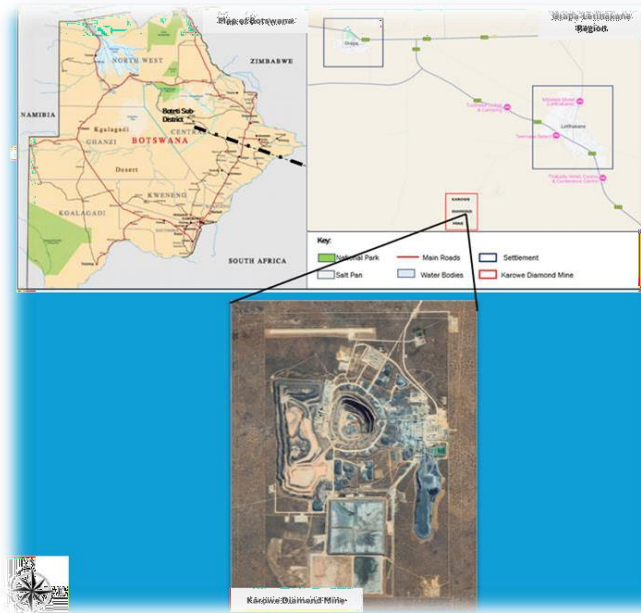


Figure 1: Karowe Diamond Mine Location Map

2.3 Topography

The Orapa-Letlhakane region is generally flat with a slight fall towards the north/northwest. Ground elevation ranges between 1000m in the south/southeast and 950m further towards the northwest. Surface drainage is virtually non-existent, except for the dry Letlhakane River (fossil valley) which drains towards the Makgadikgadi pans.

3 Tailing Storage Facilities (TSFs) Overview

KDM consists of three (3) classified Tailings Storages

Facilities. Tailings Storage facilities are:

- Fine Residue Dam 1 (FRD 1)
- Fine Residue Dam 2 (FRD 2)
- Coarse Residue Dump (CRD)

The figure below presents the site orientation of the TSFs.



Figure 2: Aerial Photo of Tailings Storage Facilities

FRD 1: FRD 1 facility is currently inactive as it has reached its maximum capacity at an elevation height of 1031 Mamsl end of year 2023. Closure and rehabilitation plans for the facility are currently underway. FRD 1 was designed prior to the publication of the GISTM. Its design criteria were based on the South African National Standards (SANS 10286). After reaching full capacity in April 2023, a closure and rehabilitation plan for Slimes Dam 1 was completed by October 2024, in alignment with GISTM requirements.

FRD 2: FRD 2 is currently active. The facility is divided into two paddocks; with the impoundment walls raised in phases to ensure there is continuously sufficient capacity for fine residue deposition. The facility was designed in accordance with the GISTM and the industry best practiced standards

The current deposition method on site for the FRD 2 facility is to place the material upstream of the inner impoundment wall side using multiple spigots. The spigots are opened and closed to control the flow of the slimes into the basin at any given time. The deposition strategy ensures that deposition controls supernatant pond location, creates beach freeboard and allows for adequate consolidation of the slimes the decant water to be pumped from the facility to the plant.

CRD: The coarse residue material is deposited at the CRD facility. The facility utilizes a single conveyor system, which constructs the CRD from north to south, and a bypass conveyor that operates from east to west and remains on standby when the main conveyor system is undergoing extension. The conveyor

system discharge points are designated as Leg 1, Leg 2, and Emergency Node. Leg 2 and the Emergency Node are actively in use, whereas Leg 1 has been decommissioned in 2021 following continuous deposition since the commencement of KDM operation

A summary of the KDM FRDs key characteristics is given in the tables to follow below.

Table 3-1: Facilities Description Properties

Facility Name	Country Region	Latitude	Longitude	GISTM Consequence Classification	Status	ITRB Latest Review (Annual)	Dam Safety Review
FRD 1 A, B, C & D	Letlhakane Botswana	-21.5144455	25.470893	Very High	Inactive	2024	
FRD 2 A & B	Letlhakane Botswana	-21.5208336	25.470556	High	Active	2024	Planned for 2030
CRD	Letlhakane Botswana	-21.5098232	25.481192	High	Active	2024	

The KDM tailings facility attributes as of June 2025 are presented in the following tables below.

Table 3-2: FRD 1 Design and Operational Attributes

Facility Attributes FRD 1				
Paddock Name	A	B	C	D
Dam utilised	2012 to March 2023			
Method of construction	Downstream Impoundment			
Status	Inactive-Dormant- Closure and rehabilitation planning in progress.			
Construction Material	Calcrete starter wall with waste rock lifts	Calcrete starter wall with waste rock lifts	Calcrete starter wall with waste rock lifts	Calcrete starter wall with waste rock lifts
Current Dam Height	15m			
Final Dam Height	15m			
Total Dam Capacity (m ³)	2,006,310	1,506,450	1,400,700	1,412,625
Slimes Volume(m ³)	1,688,684	1,336,740	1,195,114	1,306,010
Air Capacity (m ³)	317,626	169,710	205,586	106,615
Stormwater Capacity, m ³ (1 in 10 000 of 72hrs)	66,451	51,069	47,675	48,502
Deposition method	Open end spigot	Open end spigot	Open end spigot	Open end spigot
Return Water System	Barge and pump	Barge and pump	Barge and pump	Barge and pump

Table 3-3: FRD 2 Design and Operational Attributes

Facility Attributes FRD 2		
Paddock Name	2A	2B
Method of construction	Downstream Impoundment	Downstream Impoundment
Status (Utilization)	Active: Alternating Deposition	
Construction Material	Calcrete starter wall	Calcrete starter wall with waste rock lifts
Current Dam Height (m)	5	7
Final Height (m)	15	15
Total Dam Capacity (m ³) Current	1,528,964	1,545,299
Slimes Volume (m ³)	842,254	690,959
Air Capacity(m ³)	550,961	926,376
Stormwater Capacity (m ³) (1 in 10 000 of 72hrs)	135,786	95,050

Deposition method	Open end spigot	Open end spigot
Return Water System	Barge and pump	Barge and pump

Table 4: CRD Design and Operational Attributes

Facility Attributes CRD		
Deposition Leg	Leg 1	Leg 2
Dump Utilized	2012 to date	
Dump Type	Face Spreader & Dump and Dozing (Conveyor Transportation System)	
Construction Type	Dry stack; material stands at natural angle of repose	
Deposition Target (Annually)	1,800,000 t/ year	
Status	Dormant	Active
Current Average heights (m)	38	36
Current Capacity (Volume) (m³)	9,154,129	
Current Volume at the Node (m³)	81,062	
Current Footprint Area (m²)	362.555	
Average Width (m)	230	228
Average Length (m)	1157	781
Spreader Radius (m)	50	50
Deposition Advancement Rate (m/yr.)	120	120

4 TSFs Assurance Program

A Tailings Management System Framework and Operational Maintenance Surveillance manual are in place at KDM, providing an organizational framework for the management of the facilities and an overview of the procedures for operating, maintaining, and monitoring the tailings facility. Furthermore, they define performance parameters, measure performance, and report on all key facility management systems, processes, and activities needed—guided by policies, standards, etc.—to meet operational goals and business expectations.

The existing assurance program at KDM is presented in the table below.

Table 4-1: TSFs Assurance & Monitoring Program

Role	Frequency	Deliverables
Operators	Daily	Daily inspection logbook
RTFE	Weekly	Weekly TSF performance review
EoR	Monthly/ Quarterly/ Annually	<ul style="list-style-type: none"> • Monthly Inspection Reports • Quarterly reports • Annual Performance Report • OMS update • Operator Training
Accountable Executive	Annually	Document sign off (CCS rating, ALARP& Design Criteria).
Technical review Board	Annually	ITRB report

5 Consequence Classification

The consequence classification for the FRDs and CRD were conducted, with FRD 1 and CRD conducted in 2021, while FRD 2 was rated through the design assessment stage of the facility in the year 2022.

The GISTM Consequence Classification of Structures criteria was used for the rating assessment. A multi disciplined team took part in the CCS workshops to assess impacts of a dam failure. The assessment involved evaluating potential hazards and consequences to the downstream population, environment, cultural values, and infrastructure as a consequence of hypothetical dam breach of the facilities. The CCS rating also considered the various priority unwanted occurrence which could cause loss of containment (i.e., slope failure, overtopping, piping, seepage, etc.). The ratings were evaluated irrespective of the probability of occurrence of an unwanted event, i.e. Considering the maximum reasonable potential consequence of the selected unwanted event, irrespective of its probability of occurrence.

The KDM tailings facilities consequence rating is as follows:

- FRD 1 "Very High"
- FRD 2 "High"
- CRD "High"

The next CCS update for the TSFs is planned for 2027 following the update for the dam breach assessment. However, it is also updated whenever there is a material change either to the tailings facility or the physical area impacted.

6 Risk Management and Assessment Summary

KDM prioritizes risk management, as effective risk assessment is paramount to prevent dam failures. KDM ensures that safety and integrity assessments are conducted throughout the TSF

lifecycle. Advanced techniques, such as geotechnical modelling and probabilistic risk assessments, are used to identify potential failure modes and assess their likelihood. The KDM then implements robust monitoring and early warning systems can provide critical information for timely interventions.

Risk assessment such as Potential Failure Mode Effect Analysis, Critical Control Assessment, Bow-tie analyses, etc. are conducted, reviewed, and updated at a minimum annually and more frequently whenever there is a material change either to the tailing's facility or to the social, environmental and local economic context. Monitoring the identified critical controls is prioritized and reported on a weekly basis to ensure that the risks are actively managed.

The most recent PFMEA assessment was undertaken in 2024 for both FRDs. This assessment was reviewed by the Independent Technical Review Board who shared recommendations for continual improvement.

7 Impact Assessment Summary

A Human rights due diligence study has been conducted in line with the United Nations Guiding Principles on business and Human Rights (UNGP). The assessment covered human exposure and vulnerability to tailings facility credible flow failure scenarios assessed for the FRDs. The assessment for the KDM FRDs was based on hypothetical breach analyses of credible flow scenarios, which considered worst case breach locations scenarios, with an evaluation of sunny day and rainy-day failure modes. The assessment considered impacts on employees (including contractors) and their dependents. Note that breach scenarios for both facilities are contained within the mine lease area.

8 Tailings Design Lifecycle

FRD 1: The facility is currently inactive, with the dam at an elevation height of 1031 Mamsl. Closure and rehabilitation studies are being undertaken.

FRD 2: The facility is active and will be constructed to a dam height of 15 m to sustain deposition for the Life of the Open Pit (LoP) and early deposition from the underground production. FRD 2 is designed to align with the abutting FRD 1 at a final elevation of 1031 Mamsl.

FRD 3: The facility is proposed for Life of Mine (LoM), and the designs for this facility were completed in 2024. It is envisaged to be constructed to allow for deposition capacity until Life of Mine (LoM), year 2041, to sustain deposition for underground operations. The facility will be at 1031 Mamsl at final height.

CRD: The coarse residue will extend in the southerly direction of KDM to facilitate LOM production. Deposition activities will continue through Leg 2, which has been operational since 2022. In the future, Leg 3 will be implemented to meet the tonnage requirements of the Life of Mine. The final length of the three deposition legs is expected to be approximately 1650m, with all of them extending southward. The CRD final footprint will remain within the boundaries of the

mining lease area.

9 Annual Performance Review (APR) Summary

9.1 APR Description

The Annual Performance Report (APR) is an important document, which serves as an assurance that tailings facilities are managed safely and responsibly. It is equally an important tool for communicating the tailings management performance to stakeholders.

The APR summarizes the performance of the TSFs at KDM on an annual basis. The KDM TSFs team has a surveillance program in place, which is implemented to assess the performance of the facilities relative to their intended purpose.

9.2 Material Finding and Actions Taken

The TSFs have operated satisfactorily and effectively throughout the years and for the latest reporting year of 2024, they were considered to be safe, stable and secure. There were no observations made with respect to the facilities that required urgent attention in that they could affect the short-term integrity of the slimes dam embankments. Upkeeping and maintenance of the facilities will be continually implemented to improve the management of the KDM TSFs.

The next annual performance review will cover the period from January 2025 to December 2025, and the APR report will be submitted in March 2026.

10 Dam Safety Review (DSR)

The DSR for the TSFs has not been conducted and is planned for the year 2030, once all ongoing technical studies which will address the gaps in conformance to the GISTM. The DSR will be done by an independent consultant, who will review various aspects of the tailings facility to ascertain the safety of the facilities and opportunities for continual improvement.

This disclosure report therefore does not discuss any findings from the DSR.

11 Environmental and Social Monitoring Summary

11.1 Human Rights Due Diligence Assessments & Mitigation Plans

KDM undertook an assessment of the environmental and socio-economic components, of the GISTM for the KDM tailings facility. The study focused particularly on the stakeholders at risk in terms of a catastrophic failure, i.e., the KDM employees and contractors' workforce. The breach analysis reports for FRD 1 and FRD 2 were referenced in terms of defining the affected population, which is largely confined to the mine lease area.

The study covered the following aspects:

- Describing the general socio-economic status and vulnerability factors of the workforce.
- Quantified impacts of loss of production on livelihoods of workers.

- Quantified secondary impacts in Letlhakane village.
- Recommendation for continual improvement.

The project scope of the study included focused group discussions, discussion of socio-economic and human rights impacts of loss of production, description of the general socio-economic status and vulnerability factors, quantifying secondary impacts.

The possible human rights and socio-economic impacts of tailings dams failure were found to be the following:

Loss by owners and investors

- Loss of property
- Financial losses
- Loss of shares and dividends

Loss of employees and contractors

- Injuries and loss of employees' Lives
- Loss of Freedom of Association
- Salaries and benefits

Local economy stimulation

- Local procurement
- Loss of community investment
- Loss of revenue by government
- Loss of infrastructure investment

Livelihood loss and social disruption Archaeological loss

11.2 Environmental Monitoring

At KDM an Environmental Management Plan (EMP) is in place. The following described below are some of the monitoring systems in use for the TSFs environmental monitoring

1. Water Monitoring

KDM water monitoring assesses potential impacts of mine activities around the mine area as well as on nearby privately-owned farm wells, against a baseline of natural groundwater levels. Environmental monitoring boreholes have been installed downstream of the TSFs at multiple locations to assess water quality and levels. The water levels are checked on a regularly basis, and water quality samples are conducted on a quarterly basis.

These water quality assessments are conducted to identify any contaminants that could pollute nearby water sources and are compared against threshold values specified by the KDM using the BOS Drinking Water (BOS 32; 2015) and Wastewater (BOS 93; 2012) standards.

2. Dust Monitoring

The KDM dust monitoring program enables us to ensure air quality compliance. Dustfall

monitoring samplers are installed around KDM and are monitored on a monthly basis. The monitoring program extends beyond the mine lease area; it extends along the 15 km access road to Letlhakane village. At KDM we use the PM2.5 and PM10 (Particulate Matter) air quality monitors to measure fine particulate matter. Monitoring results consistently show dust deposition rates well below Botswana's residential and industrial limits of 1200 mg/m² per day, as well as compliance with local non-residential standards. The land zoning of KDM is classified as non-residential (industrial area) and thus may not exceed 1 200 mg/m² per day.

11.3 Sustainability Reports

Lucara regularly publishes annual sustainability reports. The 2024 Sustainability Report, Lucara's most recent sustainability report, was prepared in alignment with the Sustainability Accounting Standards Board (SASB) Standards for Metals and Mining (2023) and the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The 2024 Sustainability Report was also prepared with reference to the Global Reporting Initiative (GRI) Universal Standards (2021) and GRI 14: Mining Sector (2024).

All reports can be found at the link provided. Sustainability reports:
<https://lucaradiamond.com/sustainability/sustainability-reports/>

12 Emergency Preparedness and Response Plan Summary

Lucara Botswana has Emergency Response and Preparedness Plans (EPRPs) in place for the TSFs to ensure that all emergencies related to the Mine's operation of the TSFs are managed safely and environmentally responsible. These plans aim to prevent failure, safeguard human life and the environment in case of an incident, and to facilitate recovery if operations are stopped or livelihoods are disrupted.

In support of the EPRP, a desktop study was conducted in 2024, which focused on identifying and defining evacuation routes and timelines for specific areas of the mine with reference to the hypothetical breach scenarios.

This exercise will be repeated annually for continuous improvement of the mine's emergency preparedness.

12.1 EPRP Basis

For the FRDs, an EPRP was developed for the breach scenario(s) of a potential failure of the facility that would result in a flash flood downstream of the facility due to a release of water and tailings solids. A breach analysis was completed for slimes dams to estimate the downstream flood inundation zone.

The CRD EPRP has also been developed.

12.2 EPRP Review

KDM already had a dedicated Tailings EPRP before the introduction of GISTM and continues to

update and improve the procedure as industry practice or technologies evolve.

The ERPR is reviewed every three (3) years or when there is material change following an update of the dam breach analysis and risk assessments to ensure that they satisfy all the GISTM requirements.

13 Information for Local Authorities and Emergency Services

Lucara is dedicated to providing local authorities and emergency services the essential information and training required for effective disaster management planning. This is in compliance with GISTM.

In accordance with principle 15 of the GISTM, information from the dam breach analysis is shared with the District Commissioners' office and the District Disaster Management committee to enhance the preparedness and response of the local authorities in the event of an incident or at the time of simulation. KDM is working with the District Commissioner's office to develop the response and recovery plan for the communities around the mine. However, the dam breaches show the inundations to be confined to the Mine lease area.

14 Independent Reviews

Independent reviews are essential according to the GISTM as they provide an unbiased evaluation of tailings management practices, ensuring compliance with safety and environmental regulations. These reviews enhance transparency, identify potential risks, and foster continuous improvement in tailings facility management.

Table 14-1: Independent Reviews

Review Type	Reviewer	Most recent review	Next review
Independent Technical Review Board (ITRB)	Duncan Stuart-Grant Danie Brink Andrew Brown	November 2024 Report Submitted	November 2025 Report due in January 2026
Dam Safety Review	To be Appointed	Planned for 2030	Planned for 2030

The most recent site visit by the ITRB occurred from November 12th to November 14th, 2024. In their closing statements for the KDM TSF review report, the ITRB stated:

"...the KDM team demonstrated a commendable level of commitment to their responsibilities and knowledge of the tailings management system to the ITRB. Furthermore, the EoR team provided valuable insight into the management of mine residue at KDM. No major risks associated with the FRD's and CRD were identified during the site visit and from working through the technical reports and information provided by KDM and the EoR. The overall impression gained by the ITRB is that the tailings operation at KDM is well managed and that good governance is in place. Progress on implementation of the GISTM and level of forward planning to achieve full compliance is commended"

The ITRB also provided the following summary of their visit in 2023:

“...multi-disciplinary KDM team demonstrated a commendable level of commitment to their responsibilities and knowledge of the tailings management system to the ITRB. Furthermore, the EoR team provided valuable insight to and knowledge of the management of mine residue at KDM. The level of preparation and presentations by the mine tailings and the EoR teams was of a very high standard and provided much of the information required by the ITRB to make an impartial and fair assessment of the operation. The overall impression gained by the ITRB is that the tailings operation at KDM is well managed and that good governance is given the priority it deserves. Progress on implementation of the GISTM and level of forward planning to achieve full compliance are exemplary.”

KDM further has assurance assessments conducted annually from SLR Consulting Pty Ltd., Marsh Consulting Pty Ltd., and RAMBOL Pty Ltd., who also check on the Tailings facilities as part of the compliance obligation for the KDM under the Underground financing scheme. For more information on the Karowe underground project financing requirements please see Lucara Diamond's most recent management's discussion and analysis on Lucara's website.

15 Confirmation of Financial Capacity

Lucara Botswana is committed to the safe and responsible management of its tailings facilities in accordance with the GISTM. The Company recognizes its obligation to allocate sufficient and sustainable financial resources to ensure:

- Business continuity – support the construction of tailings facilities for adequate containment.
- Operational excellence – support responsible operations, monitoring and surveillance for tailings facilities
- Risk management – support risk mitigation measures put in place including emergency preparedness and response plans.
- Closure and rehabilitation – support safe closure of facilities.

16 KDM Self-Assessment Report

KDM's self-assessment of the conformance to GISTM, based on the guidance in the ICMM Conformance Protocols, was last conducted in September 2024 for FRD 1 and FRD 2. The self-assessment was conducted by a multidisciplinary site team with various field expertise. The self-assessment's results identified areas for improvement, which are being addressed.

Lucara Botswana remains committed to complying with industry best practise and responsible management of its tailings facilities.