

LUCARA BOTSWANA

POSITION STATEMENT ON THE GLOBAL INDUSTRY STANDARD ON TAILINGS MANAGEMENT

At Lucara Botswana, we recognize the importance of responsible tailings management, which aims to protect people and the environment. We work to build trust with stakeholders by ensuring long-term sustainability of our operations. We are committed to aligning our tailings management practices with the Global Industry Standard on Tailings Management (GISTM), co-convened by the International Council on Mining and Metals (ICMM), the United Nations Environment Programme (UNEP), and the Principles for Responsible Investment (PRI). We do so alongside other existing best practice standard based on the Canadian Dam Association (CDA), Australian National Committee on Large Dams (ANCOLD), South African National Standards (SANS) and the local regulations of Botswana.

Our Commitment

We are committed to:

- Comply with all the 15 principles of GISTM across our respective tailings facilities.
- Applying engineering-based approach to risk assessment and informed decision-making that prioritizes the prevention of catastrophic failure and minimizes social and environmental harm.
- Ensuring independent oversight and review of our tailings management systems to ensure alignment with GISTM requirements and other industry best practise requirements. Best practise requirements include the appointment of a Responsible Tailings Facility Engineer (RTFE), Engineer of Record (EoR), Independent Tailings Review Board (ITRB) and for accountability the Accountable Executive (AE).
- Meaningfully engage with affected communities and stakeholders in a transparent, inclusive, and culturally appropriate manner.
- Developing and maintaining stakeholder inclusive and effective emergency preparedness and response plans. These would be regularly reviewed and tested.
- Monitoring the performance of our tailings facilities, auditing our tailings management practices, and investing in ongoing training, innovation, and capacity building to ensure continual improvement in tailings management.
- Promote public accountability and transparency, as per Principle 15 of the GISTM, for public disclosure and access to information regarding our tailings facilities.

Progress on Implementation of GISTM

We have initiated a phased implementation strategy that includes:

- Prioritization of higher-consequence facilities (very high) for early compliance.
- Conducting gap assessments of existing tailings facilities against GISTM requirements.
- Implementation of a detailed action plan to achieve full compliance by 2030.
- Integration of tailings governance into corporate risk management and board oversight structures.

Disclosure of information

We are committed to annually publicly disclosing information on the status of our tailings facilities in line with Principle 15 of the GISTM standard document, including:

- Location, design, consequence classification, and status of each facility.
- Progress toward compliance with GISTM principles.
- Incident reporting and response measures.

This statement reflects our core values of integrity, sustainability, and accountability. We believe that by embracing the GISTM, we contribute to a safer and more responsible mining industry.

/s/ Johane Mchive

Johane Mchive
Accountable Executive
Lucara Botswana