

ACDC METALS LTD
ACN 654 049 699
(Company)

ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

(Approved by the Board on 25 September 2025)

1. Introduction

ACDC Metals Limited (ACN 654 049 699) (**Company**) is committed to the sustainable discovery, development and production of heavy mineral sands (**HMS**) and rare earth elements (**REE**). As a responsible explorer, 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 provide guidance for the management of activities to minimise adverse workforce, community or environmental impacts.

A strong environmental, social and governance performance is essential for the success and growth of the Company's business. The Company's aim is to recognise its legal and other obligations to all legitimate stakeholders from time to time where and to the extent appropriate. With the recognised obligations in mind, the Company will manage its activities in a sustainable manner with respect to our workforce, our communities and the environment.

The Company is committed to managing its activities to minimise adverse workforce, community or environmental impacts.

1.1 Governing principles

a) General governance principles

The Company will achieve this by:

- i. considering ESG as part of its risk management framework;
- ii. complying with or exceeding all relevant laws and regulations and applying responsible industry standards where laws do not exist;
- iii. embedding ESG considerations in the Company's business planning and decision making processes;
- iv. integrating ESG requirements when designing, purchasing, constructing and modifying equipment and facilities;
- v. maintaining a culture in which stakeholders are aware of their ESG obligations and are empowered to intervene on ESG issues;
- vi. providing continued education to all stakeholders to identify and act upon opportunities to improve the ESG performance;
- vii. undertaking and supporting research to gain better understanding of ESG and using scientific approach to support impact assessments and evidence based decision making;
- viii. taking a collaborative and pro-active approach with our stakeholders; and

- ix. 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 minimising the Company's environmental footprint;
 - (C) where relevant, protecting and respecting natural systems and associated biodiversity in areas where the Company operates;
 - (D) efficiently using water and energy and maximising the value of existing resources; and
 - (E) 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 returns to shareholders;
- ii. seek opportunities to better understand the life-cycle of greenhouse gas emissions (**GHG**) for the HMS and REE 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. pro-actively assess options to increase the use of renewable power and lower emission energy technologies to reduce the Company's GHG emissions intensity;
- v. focus on opportunities to improve energy efficiency to reduce energy used and reduce direct mining costs; and
- vi. 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.

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. 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;
- iv. 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;
- v. uphold ethical business practices and comply with all legal requirements in all jurisdictions in which the Company operates;

1.2 **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 1.1 above.

1.3 **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 bi-annual 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.