

ECORA RESOURCES PLC

SUSTAINABILITY POLICY

1. INTRODUCTION

- 1.1. Ecora Resources PLC (the “**Company**”) believes that investment success and long-term value can only be achieved through sustainable and responsible investment with a strong focus on environmental, social and governance (commonly referred to as ESG) factors. As a result, we are committed to integrating sustainability considerations into our strategic decision-making, capital allocation and corporate behaviours.
- 1.2. This policy provides the framework for our overall approach to sustainability. It is approved by our Board of Directors, reviewed on an annual basis by the Sustainability Committee and supported by detailed policies covering issues such as anti-bribery, corruption and money laundering, health and safety, diversity, inclusion and equal opportunities, human rights and modern slavery.
- 1.3. This policy applies both to the Company and companies in the Company’s group. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (“**personnel**”).
- 1.4. As a royalty and streaming company, we operate within office environments with a small workforce. Our policies and governance framework are drafted to reflect our business model and office environment. As a provider of financing to the mining sector, while we do not operate any of the assets underlying our royalty portfolio and hence do not control the manner in which operations are carried out, the Company recognises that the most critical time for assessing and mitigating sustainability risks, relating to an investment is at the outset prior to entering into any royalty or stream agreement. Therefore, we seek to promote responsible mining extraction and strong management of sustainability issues through a range of mechanisms at our disposal, including our policies, our due diligence on new investments and our ongoing engagement with operating partners.

2. SUSTAINABILITY FRAMEWORK

- 2.1. The Company has developed a framework for Ecora’s sustainability strategy that clearly communicates the areas of key focus. The Company’s sustainability activities have been divided up to sit underneath two sustainability pillars: **Responsible Business** and **Responsible Investor**. Underneath these pillars, the Company has identified the following six priority areas:

Responsible Business	Responsible Investor
1. Robust governance	4. Thematic investing
2. Responsible employer	5. Engaging with operators
3. Memberships and commitments	6. Sustainability due diligence

3. RESPONSIBLE BUSINESS

Robust governance

- 3.1. The Company is committed to conducting business ethically and transparently, in accordance with high corporate governance standards in all areas of our business. Our personnel are committed to championing and embedding the Company's purpose, values and standards, which are set out in the Company's Code of Conduct.

Responsible employer

- 3.2. The Company aims to create a safe working environment where everyone is seen, heard and valued and empowered to succeed. The Company promotes and respects the benefit of diversity among personnel at all levels of the organisation. Please refer to the Company's Diversity, Inclusion and Equal Opportunities Policy for further information.
- 3.3. The Company has also implemented its Charitable Donation Policy to support personnell's efforts to contribute to society through non-profit charitable activities.

Membership and Commitments

- 3.4. The Company is committed to improving its sustainability disclosures by aligning with suitable sustainability frameworks such as the United Nations Global Compact and the Sustainable Development Goals.
- 3.5. Under this policy, Ecora seeks to promote responsible and sustainable mining across our portfolio. In order to do so, Ecora endorses the International Council on Mining and Metals' ("ICMM") 10 Principles of Sustainable Development, which promote ethical and sustainable resource development. Ecora also endorses other globally recognised mining standards such as the International Finance Corporation's Performance Standards, Equator Principles, Voluntary Principles on Security and Human Rights, UN Guiding Principles on Business and Human Rights and the World Council's Responsible Gold Mining Principles.

4. RESPONSIBLE INVESTOR

Thematic investing

- 4.1. The Company's purpose is to provide capital to the mining sector that will be required for the supply of commodities central to a sustainable future. This not only means that the Company invests in commodities that support a sustainable future, but it also means we only invest in mining operations that can demonstrate that they embed sustainable practices as part of their approach to business.
- 4.2. The Company's investment decisions are underpinned by a careful consideration of a comprehensive range of sustainability issues, as well as technical, financial and other risks facing specific projects.
- 4.3. Ecora is committed to develop a portfolio that maximises exposure to commodity products or operations which we expect will outperform as a result of strong social, environmental and governance factors. Please refer to the sustainability due diligence section for further information below.

Engaging with our operators

- 4.4. Using the Company's sustainability risk due diligence and monitoring tools, personnel maintain close dialogue with our operating partners to proactively monitor the performance of our

portfolio assets and ensure early identification of, and engagement on, any sustainability risk and opportunities.

- 4.5. We support our operating partners to work towards strong sustainability performance, to the extent possible within the limitations of our business model and the terms of our contracts. We encourage operators' adherence to sustainability best practice by:
- a) monitoring their sustainability performance on a periodic basis using our monitoring and reporting framework, which tracks the asset's performance on a range of relevant sustainability issues;
 - b) disclosing metrics of our portfolio operations, including metrics on water management, energy, climate, waste management, health and safety and diversity;
 - c) monitoring external media reports and other publicly-available information on the assets to triangulate the sustainability data reported by our operating partners;
 - d) engaging in regular dialogue with operating partners, including conducting periodic site visits, where possible and gathering periodic reports from our operating partners on their sustainability activities;
 - e) encouraging our operating partners to adopt policies on relevant sustainability issues, acting as a positive agent of change; and
 - f) considering supporting relevant environmental and social initiatives in host communities on a standalone basis or in partnerships with our operating partners.
- 4.6. Where we suspect an operating partner has breached globally-recognised sustainability standards by, for example, causing damage to its stakeholders or the environment, we explore the full range of options available to us, including:
- a) intensifying the monitoring of the asset's sustainability activities, particularly in terms of the operating partner's management of the incident; and
 - b) increasing the level of engagement with the operating partner for a period of time, until the issue is resolved.
- 4.7. The course of action with respect to sustainability-related incidents at our underlying assets is monitored by the Company's sustainability team and determined by our Sustainability Committee on a case-by-case basis. We recognise that sustainability is a constantly evolving area and accordingly our Sustainability Committee reviews this policy on an annual basis and provides recommendations to the Board for enhancing it where appropriate. The sustainability team meets on a monthly basis to discuss any sustainability risks and opportunities that have been identified on the Company's sustainability portfolio tracker.
- 4.8. We are committed to partnering with operators on community and environmental initiatives near their projects where we have royalty and stream interests. These partnerships benefit local communities and environmental initiatives and also strengthen our Company's and the mining industry's reputation in the regions in which we invest. Before entering into such community and environmental initiatives, we carry out extensive sustainability due diligence to ensure such projects align with Company values.

Sustainability due diligence

- 4.9. Ecora recognises that the most critical time for assessing and mitigating risks, including sustainability risks, relating to an asset is at the outset prior to entering into any royalty agreement. Before completing any new investment, Ecora undertakes a thorough due diligence process using our sustainability risk due diligence framework.

- 4.10. The due diligence process is tailored to each opportunity using a risk-based approach, varying based on the jurisdiction, counterparty and commodity, whether the project is an exploration, development or producing stage project and whether it is a primary or secondary royalty or stream transaction.
- 4.11. Please refer to Schedule 1 of this policy for further information regarding our investment decision process, sustainability due diligence framework and sustainability investment criteria.

5. CLIMATE CHANGE COMMITMENTS

- 5.1. At Ecora, we recognise the importance of taking action on climate change and the important role that Ecora can and must play in supporting the energy transition. We assess the physical and transitional risks and opportunities associated with climate change that could potentially impact our business.
- 5.2. At a corporate level, Ecora has a small direct carbon footprint with only one office and 13 employees. Ecora has zero scope 1 and 2 GHG emissions. The majority of our scope 3 (upstream) emissions arise from business travel. International travel is an essential part of our business. Engaging with and monitoring our operating partners and connecting with our stakeholders is a key part of our wider sustainability strategy of being a responsible business and responsible investor.
- 5.3. While we do not own or operate any mines or mills, our largest exposure to emissions and physical climate change impacts are indirectly through our mining partners' operations (in which we invest). By providing access to capital, we believe Ecora has a role to play in supporting the mining industry in the responsible extraction of future facing commodities required for the energy transition.
- 5.4. With respect to climate change, Ecora has made the following commitments:
 - a) Ecora commits to reduce absolute scope 1 and 2 GHG emissions 46% by 2030 from a 2019 base year (please see here for further information on this SBTi approved target: <https://sciencebasedtargets.org/companies-taking-action#dashboard>)
 - b) Ecora commits to measure and reduce its scope 3 (upstream) emissions as set out below:
 - o Ecora encourages employees to make sustainable travel choices where possible through our Sustainable Travel and Expenses policy.
 - o Under such travel policy, all international flights of employees need to be signed off by a member of the Executive Committee and we seek to minimise headcount to the "necessary" for overseas travel.
 - o Ecora commits to using, where possible, airlines that have committed to the reduction of carbon emissions in line with science based targets, and we hope to see more airlines in the future align to the SBTi (or equivalent).
 - o Ecora continues to measure and offset its scope 3 (upstream emissions) on an annual basis, noting that carbon credits do not count towards any of Ecora's science based targets but is a means to finance additional climate mitigation beyond our ongoing reduction efforts.
 - c) Regarding scope 3 (downstream) emissions, Ecora continues to engage with our operating partners to understand their current and historic emissions including how such emissions are calculated, their emission reduction and net zero targets and respective action plans in line with the 1.5°C warming pathway, which, in time, will enable Ecora to set its own transition plan.

Schedule 1 – Sustainability due diligence framework

Ecora's investment decision making process involves the following key steps:

Initial screening	Tailored due diligence	Assessment criteria	Regular review
We employ rigorous screening tools and strict investment criteria to evaluate initial investment opportunities	We use a tailored and detailed due diligence framework to assess the full range of sustainability risks facing particular assets	We assess potential investments using a set of qualitative and quantitative criteria, which look at the level of a particular sustainability risk and the way in which it is being managed	Our screening and due diligence tools are regularly reviewed and updated to ensure that they continue to reflect the most up-to-date developments and mining industry best practice

Our sustainability investment process guides Ecora's approach to evaluating potential investments and screens potential investments against the Company's sustainability investment criteria (which is set out in Schedule 2 below).

In our initial screening, we endeavour to rule out potential investment opportunities in jurisdictions characterised by high levels of political, regulatory, corruption or social risk. We subsequently carefully assess potential counterparties, taking into consideration their past sustainability track record and how they are managing sustainability issues, in order to ensure that we only partner with responsible and reputable operators.

In our due diligence, we assess whether potential operating partners (in no particular order):

- a) align their activities with leading sustainability principles and initiatives, including the ICMM Ten Principles for sustainable development, the World Gold Council's Responsible Gold Mining Principles, Equator Principles, Voluntary Principles on Security and Human Rights, among others;
- b) take measures to avoid adverse environmental impacts on stakeholders around their projects, including by minimising air pollution, dust and noise and by preserving biodiversity;
- c) have systems and processes in place for managing climate risks and take measures to reduce their carbon footprint, including by maximising the efficiency of their use of energy;
- d) implement international best practice on waste management and ensure responsible design and management of tailings and other waste storage facilities throughout the project lifecycle;
- e) commit to responsible water use and management, particularly if operating in water-stressed areas;
- f) respect and protect internationally-recognised human rights and act in line with relevant global human rights standards;
- g) respect and promote the internationally-recognised core labour rights, comply with all applicable national labour protection legislation and act in line with international labour standards, such as those enshrined in the International Labour Organisations Conventions concerning freedom of association, collective bargaining, forced labour, child labour and employment discrimination;

- h) conduct their operations in accordance with high health and safety standards and encourage a strong safety culture;
- i) foster positive social and community relationships through regular engagement and social investment practices;
- j) comply with all applicable anti-corruption and bribery legislation and maintain high integrity standards within their business;
- k) implement appropriate internal whistleblowing mechanisms for personnel, as well as grievance mechanisms through which affected community members can voice their concerns and seek redress; and
- l) communicate their sustainability-related activities, where possible in accordance with international standards.

Schedule 2 – Sustainability Investment Criteria

Environmental	Social	Governance
<ul style="list-style-type: none"> • Energy supply / use • Energy management / emissions reduction plans • Carbon emissions & relative carbon intensity • Water consumption & management • Mine closure & rehabilitation plans • Impact on biodiversity and protected areas including national Parks, areas of cultural importance and/or World Heritage Sites • Air, noise, soil pollution • Tailings management • Hazardous materials 	<ul style="list-style-type: none"> • Host country labour practices • Rights of indigenous peoples • Community relations & stakeholder support • Health and safety • Existence of small scale mining in the project's area • Workforce health & safety • Labour rights • Occupational health and safety • Direct host community employment • Local procurement programmes 	<ul style="list-style-type: none"> • Purpose, values, culture and capabilities • Business ethics, integrity & transparency • Commitment to external frameworks and reporting standards • Sustainability leadership and accountability at senior management levels • Diversity and inclusion

Approval History

Date	Version	Approved By	Details
April 2020	1.0	The Board of Directors	Policy implemented following approval by the board
25 March 2024	2.0	The Board of Directors	Updates to incorporate new framework for Ecora's sustainability reporting which was launched at the time of last year's annual report and to align the policy with recent disclosures under the UNGC Communication on Progress which was submitted at the end of 2023.
25 March 2025	3.0	The Board of Directors	Minor amendments approved by the Board.