

# **PENSANA** Plc

## **POLICY**

### **GROUP SOCIAL AND COMMUNITIES POLICY**

Revision Date: 12 April 2026

# **GROUP POLICY**

## **for**

# **SOCIAL AND COMMUNITIES**

### **1. SCOPE**

- 1.1 This document is the Social and Communities Policy for Pensana Plc.
- 1.2 For the purposes of this policy, 'employee' includes any consultant or contractor to the Company.

### **2. STRUCTURE**

- 2.1 Pensana subsidiaries are expected to follow their own governance and policy implementation processes to ensure alignment with this Policy
- 2.2 Each subsidiary shall produce its own documentary procedures to demonstrate effectiveness of its management systems and shall conduct its own external assurance programmes

### **3. STRATEGY**

- 3.1 This policy shall align to the company's delivery of the Pensana Blueprint for Sustainable Rare Earths - The ESG strategy for the development of the world's first independent and sustainable rare earth supply chain

### **4. LEADERSHIP**

- 4.1 The Board shall be responsible for the content and leadership of this policy
- 4.2 The Pensana Plc Chief Executive Officer (CEO) shall be the senior leader responsible for the effectiveness and implementation of relevant management systems for the business, including the setting of relevant objectives.
- 4.3 The Pensana Plc Chief Executive Officer (CEO), or their nominee, shall be responsible for the delivery and upkeep of this policy.

### **5. COMMITMENTS**

- 5.1 Pensana aims to integrate leading practice across our business to deliver a robust approach to our communities and social programmes.
- 5.2 The Company's objectives are to:
  - 5.2.1 As a minimum, meet statutory requirements in the jurisdictions in which we operate
  - 5.2.2 Deliver strong programmes and actions to protect the human rights of our workers, suppliers, local communities and others who engage with our projects
  - 5.2.3 Promote diversity and eliminate discrimination
  - 5.2.4 Respect, preserve and promote the cultural heritage of the places where we operate
  - 5.2.5 Encourage training and education of employees in relation to their roles and responsibilities in engagement with and our statutory duties in respect of our local communities, our social programmes, protection of human rights and eradication of modern slavery practices
  - 5.2.6 Aim to minimise and where relevant reduce all adverse effects on communities local to our activities and where appropriate and feasible develop initiatives which have a positive impact, including those impacts relating to health, safety and environment.
  - 5.2.7 Develop infrastructure and skills so that communities local to our sites see a direct, long term, economic benefit from our presence.
  - 5.2.8 Act transparently and ethically at all times
  - 5.2.9 Deliver the strategy defined by the Pensana Blueprint for Sustainable Rare Earths

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**POLICY APPROVAL**

Signed by Pensana Plc CEO: .....



Date: 15 May 2024 .....

Name: ..... Tim George- Chief Executive Officer