PENSANA Plc

POLICY

ENVIRONMENT POLICY

Published on: 12 November 2026
Version Number: 2

GROUP POLICY
for
ENVIRONMENT

1. SCOPE

1.1 This document is the Environmental 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 to achieve ISO14001 environmental certification.
2.3 This policy shall be applied to Pensana (and subsidiary) operations, within on-site contractors, and where relevant and subject to suitable risk assessment, within our procurement and supply chain activities.

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 environment 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 practices across our business to protect and enhance the natural environment in and around our operations. This includes, but is not limited to, biodiversity, energy, radiation, management and storage of chemicals, water consumption, emissions to air and water, leaks and spills, noise and visual impact.
5.2 The Company's objectives are to:
5.2.1 Meet statutory requirements in the jurisdictions in which we operate
5.2.2 Protect the natural environment where we operate including the prevention of pollution and promotion of the protection of biodiversity
5.2.3 Where feasible, review and integrate opportunities to enhance the natural environment in and around where we operate
5.2.4 Foster a culture of continual improvement amongst its staff and with respect to the development of relevant environmental management systems;

5.2.5 Engage with all stakeholders relevant to the environmental management system in an open and proactive way. This may include government bodies, statutory authorities, local communities and environmental management groups;

5.2.6 Train and educate employees in relation to their roles and responsibilities in environmental management and the business' wider environmental aspects;

5.2.7 Offer training and education programmes for communities local to our operations in environmental stewardship

5.2.8 Deliver the strategy defined by the Pensana Blueprint for Sustainable Rare Earths.

POLICY APPROVAL

Signed by Pensana Plc CEO:  **Date:** 12 November 2026

Name: Tim George