



# **Environmental, Social and Governance (ESG) Policy**

**Poseidon Nickel Limited ABN 60 060 525 206**

Adopted by the Board on 15 December 2021

## Poseidon Nickel Limited Environmental, Social and Governance (ESG) Policy

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### 1 Introduction

Poseidon Nickel Limited (**Poseidon**) endorses the United Nations Sustainable Development Goals and intends that its operations will support those goals to 2030 and beyond. Poseidon is proud to be a part of the global transition to a low-carbon economy by supplying the high-quality nickel that the world needs to store renewable energy at scale.

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### 2 Poseidon commitment

Poseidon is committed to ensuring that its operations will:

- (a) have the minimum practicable impact on regional habitats and biodiversity, and where possible contribute to their conservation and restoration;
  - (b) deliver enduring economic and social benefits to local communities, and that those benefits will accrue to all community members; and
  - (c) be conducted ethically, upholding the rights and respecting the values of communities, landholders, employees, customers, investors, and others affected by Poseidon's operations.
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### 3 Responsibilities

To achieve these commitments, Poseidon will:

- (a) conform to the Corporate Governance Principles and Recommendations 4th edition as published by the ASX Corporate Governance Council and uphold business ethics through its Code of Conduct;
  - (b) fulfil its obligations under agreements with affected land title holders and under relevant commercial, labour, health and safety, environmental, and other laws;
  - (c) incorporate social and environmental risk and impact assessment into Poseidon's decision-making and execution, through its Risk Management Policy;
  - (d) manage and disclose the greenhouse intensity of Poseidon's product and the climate-related risks to its operations according to the recommendations of the Taskforce on Climate-related Financial Disclosures;
  - (e) engage proactively and transparently with communities and other material stakeholders to secure free, prior, and informed consent for Poseidon's operations, and to resolve any grievances;
  - (f) minimise work-related injury and illness at Poseidon's operations through its Health and Safety Policy, hazard management plans, and safe work procedures;
  - (g) support inclusion and diversity at all levels of employment in Poseidon's operations through its Diversity Policy and its employment and contracting procedures;
  - (h) engage with its contractors and suppliers to ensure, as far as is practicable, that its supply chain does not use any forced or child labour;
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- (i) plan and progress mine closure to minimise risk and residual liability at the completion of operations, and maintain adequate provision for rehabilitation at all times;
- (j) identify and support cost-effective industry or community programs to conserve biodiversity and improve social outcomes in the regions in which it operates, commensurate with the extent of Poseidon's operations; and
- (k) disclose its ESG performance in line with recognised reporting standards.

The Board of Poseidon will ensure that adequate resources are allocated to these commitments.

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## 4 Reporting

Senior management (comprising the Managing Director and Chief Financial Officer) will report to the Board on ESG performance of Poseidon's operations, and remedial action will be taken where it does not meet expectation.