



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

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

Adopted by the Board on 27 May 2024

## 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/Chief Executive Officer and Chief Financial Officer/Financial Controller) will report to the Board on ESG performance of Poseidon's operations, and remedial action will be taken where it does not meet expectation.