# **Sustainability Policy**

### Introduction

The Sustainability Policy outlines Finnish Minerals Group's views on corporate responsibility and its key principles. Sustainability is integrated into our company's strategy, which seeks to develop the battery value chain and reduce greenhouse gas emissions from transport.

For us, sustainability means developing our business in a away that its environmental footprint is as small as possible and to uphold the principles of fairness and respect in day-to-day operations. At the same time, business must be profitable and benefit Finnish society.

Finnish Minerals Group and its subsidiaries are required to comply with this Sustainability Policy. We also expect the associated companies in our investment portfolio to operate in line with these principles.

### Key principles

We identify relevant topics and areas of our operations that have material sustainability impacts, as well as the associated risks. We report on sustainability, its targets and development annually at the Group level. We also harness our own expertise to oversee and support the development of the sustainability of our subsidiaries and associated companies.

We require our subsidiaries and associated companies to analyze and take into account risks and opportunities, and reporting that covers economic and social impacts as well as minimizing environmental impacts. Companies must also take the impacts of their own value chain into consideration. We also require our subsidiaries and associated companies to set sustainability targets, and we monitor their realisation.

#### Financial responsibility

Finnish Minerals Group invests in mining and battery projects based on commercial principles. In our investments, our aim is to engage in proactive and long-term ownership. We seek returns on the capital we invest, along with positive social impacts such as job creation and GDP growth without jeopardising the environment or human rights.

We also want to facilitate the integration of responsibility into all our business relationships. When making decisions, we consider not only financial perspectives, but also the environment, social responsibility and good governance. The principle of continuous improvement guides the development of our operations.

We carefully investigate the background of potential partners. We evaluate the operations of our subsidiaries and associated companies from the viewpoint of responsibility. We do not work with any parties that do not comply with our Code of

Ethics. If any irregularities are detected during operations, we require that they be corrected promptly.

#### Social responsibility

We are committed to engaging in dialogue with all stakeholders or their representatives and any local communities affected by what we do. We consider ongoing dialogue to be an important aspect of our company's operations.

When we start up a project in a new geographical area, we seek to harmonise our operations with existing local livelihoods, and to create positive economic impacts in that area both directly and indirectly. We engage in open dialogue on the impact of our plans with various stakeholders, such as water cooperatives, local assocations and reindeer herding cooperatives.

We are also an active participant in the public debate on responsible mining and battery industry. We aim for open and transparent debate and to safeguard domestic and European production.

We cooperate with several educational institutions in order to increase the expertise of the workforce in a new field of industry.

#### Environmental responsibility

The operations and decision-making process of (Finnish Minerals) Group companies take into consideration the minimisation of environmental impact, the promotion of the circular economy, the halting of nature loss, as well as the Finnish Government's target of carbon neutrality. We also promote these objectives in the value chain.

We evalute environmental impacts through environmental assessments, nature surveys, emission modelling and calculations. We monitor the impact of our operations by means of measurements, analyses and studies.

We use the best available technologies to treat our emissions as effectively as possible, and monitor the environmental impact of our operations. In our risk assessments, we account for any potential disruptions that could cause contamination and we take preventive measures.

We actively promote the principles of the circular economy and look into related business opportunities. We engage in cooperation at both national and EU level in order to improve resource efficiency and promote the circular economy. Our aim is to use natural resources as sustainably as possible.

Our Group companies minimise their greenhouse gas emissions. We invest in energy-efficient technologies that have a low environmental footprint, and increase the use of fossil-free energy in our operations. We keep ourselves informed about the development of methods and techniques required to adapt to climate change, and implement them in our business operations.

### Policy implementation

The CEO is responsible for the implementation of the Sustainability Policy at Finnish Minerals Group together with the heads of the business areas. The chief governance

officers and chief responsibility officers are responsible for interpreting the application of the policy. Strategic guidelines and reporting are the responsibility of the Board of Directors.

The company's sustainability work is implemented by setting strategic targets and other plans. Sustainability targets are part of our incentive scheme.

## Policy adoption

The policy was originally approved by the Board of Directors of Finnish Minerals Group on 25 October 2021 and the updated policy on 27 January 2025. The wholly owned subsidiaries of Finnish Minerals Group follow the parent company's policies without any separate approval.

The policy is reviewed at least once a year and updated as needed. The document is public.