KAKULA TSF | GISTM PUBLIC DISCLOSURE

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Kamoa is committed to industry-leading transparency regarding the management and safety of tailings storage facilities (*TSFs*). In alignment with Kamoa's safety values and the Group Tailings Policy, the Global Industry Standard on Tailings Management (*GISTM*) was adopted. GISTM is a framework that was established to encourage safer tailings management through a process co-convened with the ICMM, United Nations Environmental Programme (*UNEP*) and the Principles for Responsible Investment (*PRI*), to ensure the highest global safety benchmarks.

The GISTM framework encompasses 15 (fifteen) principles and 77 (seventy-seven) auditable requirements across 6 (six) topic areas, comprising the entire facility lifecycle from initial site selection through to final closure. In accordance with Principle 15, which requires operators to disclose relevant information about tailings facilities to support public accountability, Kamoa provides this public disclosure to demonstrate implementation to these safety protocols.

This document has been prepared solely for the purpose of complying with the public disclosure requirements of Principle 15 of the Global Industry Standard on Tailings Management (GISTM). It is intended for informational purposes only and does not create any contractual rights, legal obligations, representations or warranties in favour of any third party, except as may be required under applicable law.

1 Overview

The Kamoa-Kakula Mine, located in the Lualaba Province of the Democratic Republic of Congo (*DRC*), is a copper mining operation comprising the Kakula and Kamoa 1 mining complexes. The operation utilises an advanced processing circuit including crushing, milling and flotation to extract copper. To manage the byproduct of this process, the mine employs a dual-stream tailings strategy of which a portion of tailings is repurposed as underground mine backfill, while the remaining volume is safely stored in the Kakula TSF.

The Kakula TSF comprises critical infrastructure for the Kamoa-Kakula operation, providing safe and controlled storage of tailings from the Kakula and Kamoa concentrators. The facility comprises a three-cell TSF system and has been developed as a full-containment valley dam with downstream-raised embankments in order to provide a stable and robust containment structure. Construction is managed in phases to ensure the facility always maintains at least 12 months of surplus storage capacity, allowing the embankment height to stay ahead of production needs.

The Kakula TSF is located 5 km upstream of the Kakula mine. The site was selected following a multidisciplinary assessment that prioritised community safety and environmental protection. Currently Kamoa is operating a single TSF (Cell 1) with deposition into Cell 1 having commenced on 26 May 2021. Deposition to the second and third cells is scheduled for the middle of 2026. The Kakula TSF is classified as a “High” Consequence facility under the GISTM.

The facility is designed to keep water away from the main embankment. Clean upstream runoff is diverted around the TSF to prevent contamination. Within the facility, a floating pump system manages the supernatant pool, ensuring it stays at a safe distance from the dam wall. To prepare for extreme weather, the design includes a closure spillway capable of safely passing a 1-in-10 000-year storm event, preventing overtopping or erosion.

Table 1 | Key Kakula TSF characteristics

Description	Facility Information	Comment
Organisation	Kamoa Copper SA	Owned and operated by Kamoa Copper SA, the Kakula TSF is a component of the Kamoa-Kakula Operation, the main activity of which is the mining of copper using underground mining methods.
Facility Location	Democratic Republic of Congo (DRC)	The Kamoa-Kakula operation is located approximately 30 km from Kolwezi in the Lualaba Province, DRC.
Lifecycle Status	Active	The Kakula TSF was commissioned in 2021 and is currently planned to be in operation until 2038.
Consequence Classification	High	This rating was assessed based on the GISTM Consequence Classification Matrix and a dam breach analysis (DBA).
Construction Method and Summary	Downstream-raised embankments	Initial earthworks focussed on foundation preparation and backfilling with approved compacted fill, as well as filter drain installation. Thereafter a compacted earthfill wall was constructed using selected fill. The upstream slope of the wall includes an HDPE geomembrane anchored at the crest. Each "Raise" or lift of the wall comprised similar foundation works and wall construction, as well as extension of the curtain/chimney drain and upstream HDPE geomembrane. Deposition takes place from the crest of each Raise, generating a pond within the valley, away from the wall. Water is returned to the process circuit via a number of barge-mounted pumps.
Key Appurtenant Structures	Run-off diversions, pumping decant system	The upstream catchment run-off is diverted away from the TSF via an excavated canal, while the internal catchment is managed by barge-mounted pumps and pipes. Internal curtain/chimney drains manage seepage through the wall.
Current / Final Tailings Footprint Area	246 ha / 1043 ha	At the time of this disclosure only Cell 1 has received tailings.
Height (m): (current/final)	Cell 1: 45 m / 50 m Cell 2: 22 m / 40 m Cell 3: 38 m / 53 m	The final height refers to the embankment height at closure or the final downstream raise.
Downstream Slope Gradient	3H:1V	Slope at the outside of the wall.
Tailings Storage (deposited)	Cell 1: 65 Mt (43 Mt) Cell 2: 14 Mt Cell 3: 16 Mt	Total available tailings storage capacity and current stored tailings (as of Jul 2026) in Mt (million tonnes).
Closure Plan Summary	Closure cover – Landform (minimal pond)	The Kakula TSF closure plan includes reshaping, topsoiling and revegetation of the outer slopes and top surface after the closure deposition plan which aims to minimise the size of the pond prior to diversions. Studies are ongoing to optimise and refine the closure plan.
Confirmation of adequate financial capacity to cover estimated closure costs	Annual closure reviews	Kamoa maintains a structured and regularly reviewed mine closure cost model, which includes the full lifecycle closure and post-closure requirements of the Kakula TSF. Closure liabilities are updated annually based on current disturbance footprints, design refinements, and evolving regulatory and operational requirements. Financial provision for closure is integrated into the Company's financial planning processes and is subject to internal governance and oversight to ensure adequacy and availability of funds.
Independent Reviews	Quarterly inspections by the Engineer of Record, Epoch Resources. Yearly review and inspection by Knight Piésold South Africa	The EoR has undertaken the designs since Prefeasibility Studies. Quarterly site inspections and monthly reviews are attended by the RTFE (Responsible Tailings Facility Engineer) and EoR. Designs are reviewed annually, which includes site inspections and review of quarterly minutes and monitoring reports.

2 Assurance and Independent Review

Kamoa utilises a multi-tiered assurance framework to validate that the Kakula TSF is managed, designed, and operated according to the highest global safety standards. Central to this process is the Engineer of Record (*EoR*), who provides continuous design oversight and ensures that all construction activities align strictly with the design intent.

The independent review process audits the facility's adherence to its "High" Consequence Classification requirements. This includes verifying that the TSF can safely manage a 1 in 10 000-year storm event across its catchment area. The technical review conducted in November 2025 by Knight Piésold South Africa confirms that the facility maintains its stability targets, seepage is effectively controlled and that pore pressures remain within safe operational limits.

3 Risk Assessment Findings

A Semi-Quantitative Risk Assessment (*SQRA*) was undertaken for the Kakula TSF to identify and evaluate potential failure modes under both normal operating and extreme conditions. The assessment identified several Credible Failure Modes that are not expected under normal operating conditions but may occur under adverse or extreme conditions if controls are not maintained.

Global slope instability has been identified as the only Credible Failure Mode to be carried forward in the risk assessment. However, it was assessed to have a low likelihood under current design, operational controls, and monitoring conditions. While the potential consequences of such a failure could be significant, the overall risk is managed to acceptable levels through the implementation of engineering and operational controls.

To manage these risks, stringent critical controls have been implemented. These include construction quality assurance and control measures, ongoing water management practices and stormwater management systems. These controls are supported by continuous monitoring and oversight by the EOR to ensure performance is maintained and risks remain within acceptable levels.

4 Impact Assessment

Impact assessments were undertaken, taking into account the credible failure modes and inundation zones estimated by the dam breach analysis. The impact assessments focused on the environmental, social, and local economic impacts of a failure, which in turn informed the classification of the Kakula TSF.

5 Environmental and Social Monitoring Programme

Kamoa implements a comprehensive, risk-based Environmental and Social Monitoring Programme for the Kakula TSF, aligned with the requirements of GISTM and international good practice. The programme is designed to provide continuous verification of facility performance, validate design assumptions, and detect early warning indicators of potential environmental or social impacts across the TSF area of influence.

Monitoring is integrated into the facility's overall risk management framework and supports adaptive management, ensuring that mitigation measures remain effective and responsive to changing operational and environmental conditions. Monitoring data are routinely reviewed by site management, the Engineer of Record (EoR), and independent reviewers, and are incorporated into ongoing performance evaluations and decision-making processes.

The monitoring programme is structured around key environmental and social receptors and includes, but is not limited to:

- Surface Water and Groundwater: Routine monitoring of water quality and quantity upstream and downstream of the TSF, including seepage and return water systems, to confirm compliance with applicable limits and standards and to detect any potential contamination pathways.
- Air Quality: Monitoring of particulate matter (dust) and associated emissions to assess potential impacts from tailings deposition, material handling, and wind erosion, with implementation of control measures where required.

- Geotechnical and Seepage Monitoring (TSF Performance): Continuous monitoring of key stability and performance indicators, including pore pressures, phreatic surface levels, seepage rates, and embankment behaviour, in line with design criteria and critical control requirements.
- Biodiversity and Ecosystem Health: Monitoring of terrestrial and aquatic ecosystems within the TSF area of influence to detect changes in habitat condition, species presence, and ecological function, supporting the application of the mitigation hierarchy.
- Community Health, Safety, and Stakeholder Engagement: Ongoing engagement with affected communities, including monitoring of community feedback, grievance mechanisms, and potential impacts to health, safety, and livelihoods associated with the TSF.

Monitoring locations, parameters, and frequencies are defined based on risk assessments, baseline studies, and regulatory requirements, and are periodically reviewed to ensure continued relevance and effectiveness. Trigger action response plans (TARPs) and performance thresholds are established for key parameters to enable timely intervention where deviations from expected performance are identified. Monitoring outcomes also inform continuous improvement initiatives, operational controls, and long-term closure planning for the Kakula TSF.

6 Human Rights Due Diligence

As part of Kamoa's continuous human rights due diligence (HRDD) process, specific risks in relation to tailings storage facility (TSF) management were identified, notably the potential exposure of people who may enter restricted areas to safety risks in the event of a tailings failure, as well as residual environmental risks affecting livelihoods, health, and access to water. These risks highlight the importance of preparedness, access to information, and effective engagement with potentially affected people, in accordance with applicable DRC legislation, in line with GISTM principles and the UN Guiding Principles on Business and Human Rights.

In response, a structured action plan was developed to address identified gaps, with a particular focus on strengthening preparedness for credible failure scenarios, enhancing the identification and engagement of potentially affected people, and integrating human rights considerations into emergency preparedness and response planning (including the EPRP), public disclosure, and recovery frameworks. Early implementation steps have included reinforcing cross-functional coordination, including the involvement of social team representatives in GISTM governance processes.

Further work is envisaged to deepen the assessment of TSF-related social and human rights impacts, including through a dedicated social impact assessment covering both operational impacts and credible failure scenarios, supporting ongoing alignment with GISTM requirements.

7 Emergency Preparedness and Response Plan (*EPRP*)

Kamoa has developed and implemented a Tailings Storage Facility Emergency Preparedness and Response Plan for the Kakula TSF. The current approved plan is Doc No. 1013-OP-07-107, with an implementation date of 01 December 2024. The plan applies to TSF emergency events at Kamoa Copper and is intended to reduce potential loss of life, property damage, environmental harm and disruption within the Zone of Influence.

The EPRP follows a structured emergency management process covering emergency preparedness, emergency event detection and level determination, notification and communication, emergency response and close-out. The plan uses Code Green, Code Yellow and Code Red escalation structure. Code Red is declared when there is a high likelihood of TSF failure or where failure has occurred. Code Red includes Emergency Level 1, which places the response in emergency standby, and Emergency Level 2, which requires immediate evacuation within the Zone of Influence.

During a Code Red emergency, the Emergency Response Committee is activated in accordance with the Kamoa Copper Emergency Preparedness and Response Guideline. The Joint Operations Centre supports notifications and prepares for Emergency Management Services and Emergency Response Team activation. The Plant Control Room stops tailings deposition to the TSF, while the Responsible Tailings Facility Engineer proceeds to the TSF with the Dam Operator Site Manager, Engineer of Record, Health & Safety and Environmental leads to assess the situation and confirm the required response level.

The Emergency Response Team forms part of Kamoa Copper's site emergency response capability. The ERT executes assigned emergency response actions under the direction of the Emergency Response Committee,

EMS (Emergency Medical Service) command structure and Joint Operations Centre. ERT support may include life-safety actions, emergency standby, controlled deployment into safe areas, casualty care, medical evacuation support, search and rescue where safe and authorised, incident communication, emergency lighting support and response logistics. ERT deployment remains risk-based and subject to scene safety, Zone of Influence controls and technical direction from the Responsible Tailings Facility Engineer and Engineer of Record.

The emergency response priorities are protecting lives, protecting environmentally sensitive areas, protecting property and supporting dam structure damage control where safe and technically feasible. Immediate actions include evacuation of dam operating personnel from below the potential breach area, control of people and vehicle movement on mine access roads within the Zone of Influence, notification of downstream communities through the relevant communication channels and implementation of agreed technical actions where feasible.

The EPRP is supported by the Emergency Contact List, Zone of Influence maps, Emergency Levels diagram, Trigger Action Response Plans, TSF Operating Manual and Dam Breach Analysis. Emergency preparedness is maintained through training, drills and simulations. Dam breach emergency simulations are required at least once every three years and include external stakeholder engagement. Annual training and exercises are used to maintain readiness for dam breach scenarios.

Where applicable, notifications will be made to the competent authorities in accordance with the applicable laws and regulations of the Democratic Republic of the Congo, including the relevant mining, environmental and emergency response authorities.

8 Kakula Conformance Level

As of 2025, the Kakula TSF partially meets the GISTM in accordance with ICMM Conformance Protocols. The assessment indicates a progressive improvement in alignment with the GISTM. As of 2025, the Kakula TSF Cell 1 demonstrates an overall conformance level of 84%, with 69% of requirements fully met. The remaining requirements are being actively addressed through structured action plans, with a continuous focus on closing out partial and non-conformances. Conformance is expected to improve as outstanding actions are completed, with progress tracked through internal systems and subject to review by the EoR and independent reviewers.

A GISTM conformance summary for the Kakula TSF is provided in Table 2.

Table 2 | GISTM conformance summary

Assessment outcome	Number of requirements	Weighting factor	Conformance Status (%)
Meets	53	1	69
Partially Meets	12	0.5	8
Does not Meet	6	0	0
Not Applicable	6	1	8
Total	77		84
The remaining 16% conformance gap comprises approximately 8% associated with partially met actions and 8% associated with actions that currently do not meet the requirements.			

9 Additional Information

9.1 Financial Capacity

Requirement 15.1.B.10 – Annual confirmation that the Operator has adequate financial capacity to cover estimated closure costs of planned closure, early closure and reclamation.

Kamoa has sufficient financial resources to meet its business requirements for the foreseeable future, including capital expenditures, working capital requirements, interest payments, insurance, environmental rehabilitation, securities buyback and dividends.

9.2 Raising Concerns

9.2.1 Communicating the Grievance Management Procedure

The Company is responsible to provide feedback on the outcomes of the grievance resolution process, particularly aspects resolved or unresolved and pending TSF related grievances. Various approaches will ensure grievances are captured and give feedback on progress with resolving the grievance and associated Project information.

The aspects considered include:

- The ability of the Project stakeholder to access these events or mechanisms must be considered. The Company will put in place mechanisms to overcome barriers to access. For example, hold meetings where the Project stakeholders live, take Project information out to them and ensure that vulnerable Project stakeholders are assisted in ensuring effective access to the grievance management procedure and associated processes.
- Ensuring that places and persons designated for receiving complaints are accessible to Project stakeholders. The Company will put up a grievance booth or office outside the Company's gate, with a booth within communities, preferably at the Village Chief's office
- Grievance Officers from the local communities will be appointed. These Grievance Officers will serve as a point of contact for submitting grievances. Having local Grievance Officers puts a human face on the community's relationship with the Company and engenders trust.
- The Company will ensure that copies of the external grievance logging forms are widely available at grievance booths, community representatives, office of the village chiefs, shops, clinics and so forth.
- Where a grievance is related to a single Project stakeholder, individual face-to-face discussions will be more effective.
- Where a group of Project stakeholders is affected by a specific grievance, group meetings will be helpful.
- Use printed materials. Such materials must be visually engaging and easy to understand, especially where literacy levels are low. Grievance forms for submitting written complaints must also include information about the grievance management procedure. Get permission to put displays in public places that community members frequently visit.
- Company representatives (Grievance Officers, relevant employees) must build a personal connection with Project stakeholders through a local presence or visits by Grievance Officers. Communicating through employees or workers is especially effective if they come from the affected communities. Senior Company management should attend important Project-related events where Project stakeholders are present.
- Equip employees and Grievance Officers with the necessary information and training, particularly those in contact with external stakeholders.
- Third parties (community structures, non-governmental organisations (NGOs) and so forth) can be essential Project resources. The Company will ensure that third parties have a mandate and a consistent message when communicating with Project stakeholders.

- Use the Company website. Provide Project information on the grievance management procedure on the website. Ensure that Project stakeholders are informed about the website and how to access this information.
- The Company will implement regular capacity-building actions with the Project stakeholders and associated structures. The Project-related public consultation process will be used to publicise the grievance management procedure. This capacity-building will focus on understanding the Project, the purpose of the grievance mechanism, how the procedure functions and how to submit a grievance. The capacity-building will guide what grievances can be addressed within the grievance management process and which grievances fall outside the mandate of this grievance management procedure. The relevant Company staff, including the Grievance Officers, will be part of this capacity-building process. The capacity-building processes will be implemented urgently, and refresher courses every six months.

9.2.2 Resources for Managing TSF Related Grievances

In general, the role of senior management must be clear, e.g. those responsible for strategic oversight of the Project grievance mechanism with particular attention to the cases related to TSF. The officials and referral paths, depending on the nature of the grievance, will be specified.

The grievance management function must be adequately resourced and be a dedicated function with specific responsibilities and mandates. The Company has established a grievance Clearing Committee. This committee guides where grievances will be routed to ensure an appropriate resolution path, depending on the nature of the grievance.

9.2.3 Monitor and Evaluating TSF Related Grievances

The grievance management procedure will be monitored on an ongoing basis, with weekly progress reports submitted to management with copies provided to all technical services involved with the TSF. The overall effectiveness of the grievance management procedure will be assessed on a six-monthly basis. Aspects to be considered include Project stakeholder feedback on the use and effectiveness of the procedure, awareness of the grievance management procedure, unresolved grievances and adherence to process time frames.

The Company may consider revising the mechanism depending on the Project stakeholder feedback and technical TSF matters. If many grievances are not resolved, the Company may reconsider its approach rather than only increasing efforts to resolve individual grievances. If many similar TSF grievance cases are recorded, it may indicate that the Company must undertake appropriate management interventions.

The Company will consider involving an external group or NGO in evaluating the impact of the grievance management procedure.[1] Such involvement will add to the independence and robustness of the Company grievance management procedures.

10 Disclaimer

Kamoa Copper has prepared this document with reasonable skill, care, and diligence, taking account of the workforce, timescales, and resources devoted to it.

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[1] (International Finance Corporation 2009, 28)

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