

# STL ESG POLICY (Environment, Social, Governance)



Société Congolaise pour le traitement  
du Terril de Lubumbashi

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Approved by: Grant Dempsey, General Manager.		
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## **1. STL Purpose**

Société Congolaise pour le Traitement du Terril de Lubumbashi (STL) recognises that responsible mineral processing must create value not only for the business, but also for people, communities, and the environment.

This Environmental, Social and Governance (ESG) Policy sets out STL's commitment to operating responsibly, ethically, and transparently, while managing the environmental and social impacts of our activities and upholding strong governance practices.

Guided by international standards and implemented through STL's SHEC Policy, Code of Ethics, and Responsible Supply Chain framework, this policy provides a clear foundation for sustainable operations, stakeholder trust, and continuous improvement across all aspects of our business.

## **2. Scope**

This policy applies to all STL employees, management, and Board members, as well as contractors, suppliers, and business partners across all STL operations and activities.

## **3. References**

STL's ESG commitments are informed by recognised international standards, responsible sourcing frameworks, and applicable national regulations relevant to its activities. These include STL's internal Safety, Health, Environment and Community (SHEC) Policy, internationally recognised due diligence and human rights frameworks, and management system standards that support responsible environmental and occupational health and safety practices.

In particular, STL aligns its ESG approach with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains, the Responsible Minerals Initiative (RMI) Joint Due Diligence Standard, ISO 14001 for environmental management, ISO 45001 for occupational health and safety, the Universal Declaration of Human Rights, and the laws and regulations of the Democratic Republic of Congo.

## **4. Environmental commitments (E)**

STL is committed to preventing pollution, protecting natural resources, and minimizing the environmental impacts of its operations. In line with its SHEC

Policy and ISO 14001-aligned Environmental Management System, STL commits to:

- Protect air, water, and soil through monitoring, control measures, and continuous improvement;
- Manage waste, hazardous substances, and effluents responsibly;
- Use energy, water, and raw materials efficiently;
- Prevent and respond to environmental incidents;
- Comply with environmental permits, regulations, and international best practices;
- Integrate environmental considerations into operational and strategic decision-making

## 5. Social Commitments (S)

STL places people and communities at the heart of its operations. In alignment with its SHEC Policy, ISO 45001, and human rights principles, STL commits to:

- Providing a safe and healthy workplace and striving for zero harm;
- Respecting human rights and maintaining zero tolerance for child labour, forced labour, discrimination, or harassment;
- Ensuring fair working conditions, lawful working hours, and equitable remuneration;
- Promoting gender equality, diversity, and inclusion;
- Engaging transparently with local communities through dialogue, consultation, and grievance mechanisms;
- Supporting community development initiatives in accordance with agreed social commitments.

## 6. Governance Commitments (G)

STL upholds strong governance practices to ensure ethical conduct, accountability, transparency, and respect for human rights across all its activities. STL commits to:

- Conducting business with integrity and in compliance with applicable laws and regulations;
- Maintaining zero tolerance for bribery, corruption, fraud, or illegal payments;

- Maintaining zero tolerance for child labour, forced labour, sexual harassment, sexual exploitation, abuse, discrimination, or any form of human rights violation;
- Providing a safe, respectful, and dignified working environment for all employees, contractors, and stakeholders;
- Implementing responsible sourcing and supply chain due diligence in line with OECD and RMI requirements;
- Clearly defining roles, responsibilities, and internal controls to support effective governance;
- Protecting whistleblowers and ensuring confidential, accessible reporting mechanisms;
- Monitoring and managing ESG-related risks through a risk-based approach and continuous improvement.

## 7. Responsible sourcing and due diligence

STL implements a risk-based due diligence system to identify, assess, prevent, and mitigate environmental, social, and governance risks within its supply chain. This includes maintaining traceability, engaging suppliers, addressing identified risks, and reporting on due diligence performance in accordance with the OECD framework and the RMI Joint Due Diligence Standard.

## 8. Roles and oversight

The Board and Top Management provide leadership and oversight for ESG performance. Management ensures implementation through the SHEC Policy, Code of Ethics, Responsible Supply Chain procedures, and STL's management systems. All employees, contractors, and business partners are expected to comply with this policy and report concerns.

## 9. Monitoring, reporting & Continuous improvement

STL monitors ESG performance through defined indicators, audits, and management reviews. Corrective and preventive actions are implemented where necessary, and STL is committed to the continuous improvement of its ESG performance.

## 10. Communication and training

This ESG Policy is communicated internally to employees and contractors and made publicly available through STL's communication channels. Training and awareness initiatives support effective implementation and understanding of ESG commitments.

## 11. Approval and Review

This ESG Policy is approved by STL Top Management and is reviewed periodically to ensure its continued relevance, effectiveness, and alignment with applicable standards and stakeholder expectations.

In addition, this policy may be reviewed and updated following significant incidents, material changes to STL's operations or risk profile, changes in applicable legal or regulatory requirements, or where identified through audits, investigations, or management reviews.

Grant Dempsey  
**Print name**

General Manager  
**Position**

23<sup>rd</sup> January 2025  
**Date**

**Signed**

23<sup>rd</sup> January 2027  
**Review date**