

	MEMORANDUM	Document ID	TNCL-MGT-MEMO-0010
		Document Owner	Management
	KABANGA PROJECT GOLDEN RULES	Revision	00
		Approval Date	17/03/2026

## MEMORANDUM

<b>Date</b>	<b>March, 2026</b>
<b>From</b>	<b>Gerick Mouton - Kabanga Project CEO</b>
<b>Issued to</b>	<b>Kabanga Nickel Limited and Tembo Nickel Corporation Limited</b>
<b>Subject</b>	<b>Kabanga Nickel Project Golden Rules</b>

These Golden Rules (the “Rules”) are issued by Kabanga Nickel Limited (KNL) and Tembo Nickel Corporation Limited (TNCL) for the Kabanga Nickel Project hereinafter known as the Company.

These Rules sit under and must be read with the Lifezone Metals Group Code of Conduct and the Lifezone Metals Human Rights Policy Statement (together, the “Group Policies”). These Rules set minimum non-negotiable controls for Project work and site access. Where the Group Policies set a higher standard than local practice or custom, the Company seeks to apply the higher standard to the extent permitted by Tanzanian law. If there is any uncertainty or potential conflict between these Rules, the Group Policies and Tanzanian law, you must escalate to the Group General Counsel.

### 1. Purpose, Scope & Legal Status

These Rules apply to all employees, consultants, contractors, subcontractors, suppliers, transporters, visitors and any other person who enters, works at, travels for or performs work for the Kabanga Nickel Project under the control of the Company.

These Rules are mandatory conditions of employment, engagement, site entry and continued site access. They take effect immediately upon issue and apply across all Kabanga Nickel Project-controlled areas, camps, offices, satellite offices, construction sites, community offices, workshops, roads, laydown yards, plants, underground workings, warehouses, company accommodation, company transport and any other place where Project work is being performed.



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These Rules are issued under the authority of the Company's management, the HSE and security management systems, contracts of employment, contractor and supplier agreements, site induction requirements, permits to work and lawful workplace rules and instructions.

Any employee, contractor, consultant or supplier has an obligation to report and stop any work deemed to be unsafe as per Project OHS Policy. Failure to report may result into disciplinary action. The Kabanga Project CEO has mandate to remove any person from the workplace or company accommodation, suspend site access, withdraw a Project assignment, direct demobilisation from the Project or from Tanzania where applicable, immobilise equipment, seize an access card or secure evidence where this is reasonably necessary to protect life, health, property, the environment, security, social license to operate or the integrity of an investigation. The Kabanga Project CEO may decide to delegate this authority to other designations within the Company.


These Rules shall be read consistently with Tanzanian law and the Group Policies. Where the Group Policies set a higher standard than local practice or custom, the Company seeks to apply the higher standard to the extent permitted by Tanzanian law. When there is ambiguity in interpretation between Group Policies and Tanzania laws, the later shall prevail.

## 2. Interpretation

For purposes of these Rules:

- "Unauthorized" means without the licence, certificate, training, permit, written approval, induction or supervisor instruction required by law, Company procedure or the task.
- "Possession" includes on the person, in clothing, bags, lockers, rooms, desks, vehicles, equipment or any place under a person's control.
- "Under the influence" means impaired or random alcohol test results beyond set limits for alcohol consumption as per OHS Policy, zero tolerance on illegal drugs, narcotics or misused medication to an extent that may affect safety, judgement, behaviour or performance.
- "Weapon" includes any firearm, ammunition, explosive, imitation firearm, machete, knife or any item carried or used to threaten, coerce or injure a person, except where specifically authorised in writing for lawful security or work purposes.
- "Expatriate personnel" means employees, secondees, assignees, consultants or contractor personnel working in Tanzania under a non-citizen work permit, residence permit, visa or



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other immigration permission tied to Project work, including personnel mobilised under international assignment arrangements.

- Any attempt, instruction, assistance, concealment, falsification of records or evidence, retaliation against a reporter or witness, or knowing failure to report a breach of these Rules is itself a breach of these Rules.

### 3. Consequences of Breach

#### Employees (Nationals and Expatriates)


- Immediate removal from work and site, and suspension from duty and/or site access pending investigation in accordance with Company procedure and applicable law.
- Where the allegation is substantiated after investigation and disciplinary process, dismissal or termination for serious misconduct to the fullest extent permitted by Tanzanian law.
- Referral to the Tanzanian Police Force (TPF), Prevention and Combating of Corruption Bureau (PCCB), the Mining Commission (MC) or any other competent authority where required by law or considered necessary, in coordination with the Company and the Group General Counsel after completion of internal processes.

#### Contractors Expatriate personnel:

The additional steps below reflect lawful site access controls, immigration requirements and international assignment arrangements.

- Immediate removal from work, site and any Company-controlled accommodation, and immediate withdrawal of the Project assignment in Tanzania.
- Immediate demobilisation from Tanzania and return, at the earliest lawful and practicable opportunity, to the person's contractual country or point of hire, or to another location directed by the employing company.
- The person's employing company shall manage the disciplinary, employment and contractual process outside the Project in accordance with applicable law and contract terms.
- The Company may permanently deny site re-entry and has no obligation to maintain site access, accommodation or Project presence in Tanzania while any separate process is ongoing or after it is concluded elsewhere.



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- Where employment or engagement in Tanzania ceases, the employing entity shall complete all required immigration, residence permit, work permit, reporting, surrender and exit formalities.

Consultants, supplier personnel and visitors:

- Immediate removal from the workplace and immediate suspension of site access pending investigation.
- Where the allegation is substantiated, permanent withdrawal of site access for the individual.
- The contracting entity may be required to replace personnel immediately and may face stop-work orders, withholding of payment, contractual penalties, recovery of losses, and suspension or termination of the relevant agreement.


Nothing in this section limits the Company's right to take urgent action to protect people, property, the environment, community or security. Disciplinary action for employees will follow the applicable Company procedure and Tanzanian law. Nothing in these Rules limits any person's right to raise a concern, use the Group whistleblowing facility, or access a grievance mechanism or remedy process provided by the Company.

## 4. The Golden Rules

### 4.1 Bribery, Corruption & Improper Inducements

- Soliciting, participating, demanding, promising, offering, giving, receiving, accepting or agreeing to receive any bribe, kickback, facilitation payment, secret commission, sexual favour to influence decisions, any form of prostitution, gift, entertainment, employment opportunity, discount or any other advantage intended to improperly influence a decision or obtain an improper benefit.
- Corrupt conduct connected to procurement, customs, taxes, permits, licences, inspections, land access, community matters, recruitment, promotion, payment, invoice approval, security, transport or any public or private transaction.
- Use of agents, intermediaries, consultants, suppliers or community representatives to do anything that an employee or contractor is prohibited from doing directly.
- False entries, off-book payments, false invoices, false claims, misleading descriptions, or any concealment of corrupt conduct.



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- Exception for personal safety: If you are coerced into making a payment because you have good reason to believe you cannot escape immediate and serious physical harm unless you comply, you may make the payment solely to protect life. You must report it without delay, provide a written account, and cooperate with follow-up. This exception does not apply to delays, commercial pressure or threats to property.
- All gifts and hospitality must comply with the Group Code of Conduct, including any required approvals and record keeping.

Any suspected corruption shall be reported immediately through line management, the Project reporting chain, the Group General Counsel and/or the Group whistleblowing facility and may be referred to the PCCB and other competent authorities where required by law or considered necessary after completion of internal processes.

#### **4.2 Human Rights, Child Labour, Forced Labour & Trafficking**


- Employing, engaging, contracting, procuring or permitting any person under 18 years of age to perform work for the Project in any operational, construction, mining, processing, driving, security, maintenance or field role.
- Forced labour, bonded labour, debt bondage, trafficked labour, prison labour, slavery, servitude or any compulsory labour.
- Confiscating identity documents, withholding wages, charging unlawful recruitment fees, restricting lawful movement, threatening deportation or arrest to coerce labour or services, or using coercion, intimidation or abuse of vulnerability to obtain labour or services.
- Knowingly using any contractor, subcontractor, labour broker or supplier that engages in the conduct prohibited in this Rule.

Every person engaged on the Project must work voluntarily and lawfully and must be paid and treated in accordance with Tanzanian law and applicable contract terms.

#### **4.3 Alcohol, Drugs, Weapons, Violence, Bullying & Harassment**

- Entering, remaining on, or performing work on site while under the influence of alcohol, illegal drugs or any substance that impairs safe performance.
- Possession, use, sale, distribution or storage of beverage alcohol or illegal drugs on site, in company vehicles, in company accommodation or while conducting work for the Project.



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- Possession, carrying, storage or use of any weapon without prior written Company authorisation and all licences or permits required by Tanzanian law.
- Assault, fighting, threats, intimidation, coercion, bullying, abusive behaviour, sexual harassment, indecent conduct or any form of unlawful harassment or violence.
- Unlawful discrimination or retaliatory action against any person, including based on age, race, ethnicity, nationality, disability, gender, sexual orientation, pregnancy, political affiliation or union membership.

Prescription or over-the-counter medication does not excuse unsafe work. Any person whose medication may affect safe work must immediately disclose that fact through the Company medical or HSE process required by site procedure before commencing work.

#### **4.4 Traffic, Driving & Road Safety**


- Driving any vehicle without a valid driving licence for the vehicle class and Company authorisation for the task or route.
- Operating a vehicle while under the influence of alcohol or drugs, while fatigued to an unsafe extent, or while medically unfit to drive.
- Exceeding posted speed limits or driving at a speed unsafe for weather, road, traffic or visibility conditions.
- Failing to wear a seatbelt, allowing any passenger to travel without a seatbelt where fitted, overloading a vehicle, or carrying passengers in an unsafe manner.
- Using a hand-held or hands-free mobile phone, radio, tablet or other electronic device while driving, unless the vehicle is safely parked, stationary and out of the line of travel.
- Overtaking, parking, reversing, turning, crossing or proceeding contrary to road signs, traffic controls, spotter instructions or site right-of-way rules.

These requirements apply within the Project footprint and on any public, government or community road used for Project business whereby a company or contractor vehicle is used.

#### **4.5 Unauthorised Equipment Operation, Isolation Breaches & Tampering**

- Operating or instructing another person to operate any vehicle, mobile plant, lifting equipment, crane, electrical system, explosive, pressure system, machine, tool or process without the required training, certification, competency assessment, permit or authorisation.



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- Tampering with, defeating, bypassing, removing, disabling, misusing or failing to use any guard, interlock, alarm, fire suppression system, emergency stop, seatbelt, gas detector, isolation device, lock, tag, barricade, sign or any other safety-critical device or control.
- Re-energising, restarting, moving or testing equipment that is isolated, locked out, tagged out, barricaded or under maintenance without express clearance under the applicable isolation and/or lock-out procedure.
- Falsifying or signing pre-start inspections, licences, permits, logbooks, maintenance records, isolations, training records or equipment checklists that are not true and accurate.

#### **4.6 Unauthorised Entry & Restricted Areas**

- Entering, remaining in, or directing another person to enter any restricted, barricaded or no-go area without prior authorisation.
- Entering or remaining in a blast area during charging, countdown, blasting, misfire control or before the official all-clear.
- Entering a line-of-fire zone, suspended load area, geotechnically unstable ground, excavation, confined space, explosives area, energised electrical area, water management structure, live traffic work zone or any other area identified as restricted by permit, barricade, sign or instruction.
- Breaking barricades, removing warning signs, crossing safety tape, defeating access controls or ignoring an evacuation, stop-work or exclusion instruction.

#### **4.7 Environmental Protection, Reporting & Record Integrity**

- Deliberately or recklessly causing, authorising or concealing any unauthorised discharge, spill, dump, burn, bury, leak, release or disposal of chemicals, hydrocarbons, reagents, sewage, tailings, waste, hazardous substances or contaminated material.
- Bypassing, disabling or tampering with any environmental control, monitoring system, containment, treatment system, sampling point, spill response control or inspection device.
- Concealing, delaying or falsely reporting any spill, release, incident, injury, near miss, equipment damage, sample result, monitoring data, inspection result or regulatory information.



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- Giving false or misleading information in any permit, inspection, investigation, monitoring record, statement or report.

## 5. Mandatory Cooperation & Reporting

Every person must immediately report a suspected breach of these Rules, preserve evidence, and cooperate fully and honestly with lawful instructions, testing, inspections, searches, interviews and investigations required by law, Company procedure or incident response. Reporting may be made through line management or the Project reporting chain, or via the Group Whistleblower channels set out in the Group Code of Conduct. Any testing or searches will be conducted by authorised personnel, lawfully, respectfully and proportionately, and in a manner consistent with the Group Human Rights Policy and the Voluntary Principles on Security and Human Rights. Obstruction of an investigation or retaliation against a person who raises a concern in good faith is a breach of these Rules. Any question about a potential conflict between these Rules, the Group Policies and Tanzanian law, or about reporting to regulators, must be escalated to the Group General Counsel unless immediate action is required to protect life or prevent serious harm.

## 6. Legal Alignment

These Rules are intended to operate consistently with Tanzanian law and the Group Policies, including the Employment and Labour Relations Act and the Employment and Labour Relations (Code of Good Practice) Rules, the Occupational Health and Safety Act, the Mining Act and the Mining (Safety, Occupational Health and Environment Protection) Regulations, the Road Traffic Act, the Prevention and Combating of Corruption Act, the Law of the Child Act, the Anti-Trafficking in Persons Act, the Arms and Ammunition Act, the Non-Citizens (Employment Regulation) Act, the Immigration Act and the Environmental Management Act, each as amended from time to time. Where concerns arise, legal advice must be sought via the Group General Counsel before a non-urgent action or decision is taken. These Rules may be revised or amended from time to time.

Signed for and on behalf of

**KABANGA NICKEL PROJECT:**

*Gerick Mouton*

Gerick Mouton Kabanga Project CEO

**Name and Title:**

17 March 2026

**Effective Date:**

